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Wednesday, 16 January 2013

(10.00 am)

(Proceedings delayed)

(10.31 am)

Housekeeping

THE CORONER: Good morning, everybody. My apologies for a late start but I think as you have probably heard there has been a very serious incident locally and that's caused an upset to travelling conditions for some people. I believe that everybody has been able to get here now.

Before we ask the jury to come in, I just want to raise a couple of administrative points. The first is I dealt with directions concerning transcripts this morning. I hope you have all had that and I hope that that looks to be workable. If there are any difficulties then we can raise them at the next break or at a convenient break.

The second is this, just concerning the timetable for today: the first witness that I shall be inviting to give evidence this morning is Miss Jade Spence, and we are then going to have a demonstration of the firefighters' equipment which I think Dr Mansi is going to assist us with. I would suggest that we have a break as soon as that has occurred and then delay the start of

1 crew manager Willett's evidence until after the  
2 lunchtime break, which I hope will give everybody  
3 an opportunity to have absorbed, to some extent,  
4 Mr Davey's report before crew manager Willett gives his  
5 evidence. Does that sound workable to everybody? I see  
6 nods all round. What I will just need to do is to make  
7 sure that jurors will be able to accommodate a change in  
8 the timetable, but I hope that that will be possible.  
9 Does anyone foresee any difficulty with that proposal?

10 MR WALSH: Madam, certainly not, but could I just confirm  
11 that "after lunch", as I understand it, might mean 1.30?

12 THE CORONER: Yes, I'm sorry, I should have made that clear.  
13 I think that if we aim for a 1.30 start this afternoon.  
14 Does that sound acceptable to everybody?

15 MR HENDY: Madam, I am sure that it will be workable. My  
16 estimate is that I need an hour to deal with Mr Davey's  
17 report in relation to Mr Willett, an hour of  
18 preparation.

19 THE CORONER: All right, Mr Hendy. Well, if you perceive  
20 there to be any difficulty then please let me know. But  
21 we'll try and make it work.

22 All right, thank you very much. Does anyone want to  
23 raise any other matter before we invite the jury to come  
24 in?

25 MR MAXWELL-SCOTT: Madam, I'm just going to clarify. As

1 I understand it, the plan with the breathing apparatus  
2 demonstration is that the two firefighters should come  
3 into the courtroom dressed as they would be for  
4 travelling on an appliance and would then demonstrate  
5 putting on the breathing apparatus and Dr Mansi would  
6 talk us through what they're doing and what the  
7 different items of equipment are.

8 THE CORONER: That sounds very helpful. Any problems with  
9 that? All right, thank you very much. Yes, could we  
10 invite the jury to come in? Thank you.

11 (In the presence of the Jury)

12 THE CORONER: Members of the jury, good morning.

13 I apologise for this late start. There have been some  
14 logistical problems for people in getting in this  
15 morning. As you may have heard there has been a very  
16 serious incident locally, but everyone who needs to be  
17 here has been able to get here this morning, so that's  
18 the reason why we're starting late. My apologies for  
19 that.

20 The plan that we have today is to hear first from  
21 Miss Jade Spence, who is going to give evidence, and  
22 then we plan to give you a demonstration of the  
23 firefighting kit and equipment, which I hope will be  
24 useful to you. Then this afternoon we plan to go on to  
25 evidence from one of the firefighters. It's going to be

1 helpful to us, if it's convenient and acceptable to you,  
2 if we have a break for lunch which finishes at 1.30 so  
3 we start again this afternoon at 1.30, rather than  
4 2 o'clock. We may need to run on until about 3.45 or  
5 4 o'clock this afternoon, although we'll have a short  
6 break some time after the 1.30 start. Does that sound  
7 as if that's going to be possible for everybody? Does  
8 anyone foresee any difficulty with that? All right,  
9 well, thank you very much. That's helpful.

10 Can I just raise one matter with you, members of the  
11 jury: I wonder whether you have had the opportunity to  
12 choose a foreman. You have. Thank you very much. I  
13 have been giving some thought to how best to manage the  
14 question of questions from the jury to witnesses who are  
15 giving evidence, and I wonder whether we might see  
16 whether this would be a helpful approach. If any jurors  
17 would like to put questions to any witnesses, then  
18 perhaps they could come through you, madam foreman, and  
19 perhaps you could tell me what question it is that you,  
20 as jurors, would like to put and then I can help to put  
21 that to the witness if appropriate.

22 THE FOREMAN OF THE JURY: Okay.

23 THE CORONER: Shall we see if that will work?

24 THE FOREMAN OF THE JURY: Yes, thank you.

25 THE CORONER: The last point I want to raise before we start

1 is for members of the press. I see that in fact there  
2 are far fewer of you here today than there have been  
3 over the two previous days, but I understand that there  
4 has been quite a lot of noise from the press area and  
5 that has been disturbing jurors. The sound in this room  
6 is not easy at the best of times, and so please, I do  
7 ask you to keep sound to an absolute minimum, because  
8 any noise is distracting and makes it difficult for  
9 jurors to hear. So please could I ask you to do that.  
10 Thank you very much.

11 Unless there are any other matters, we'll go onto  
12 our first witness this morning.

13 MR MAXWELL-SCOTT: Yes. Madam, as you've stated, the first  
14 witness this morning is Jade Spence.

15 THE CORONER: Thank you very much. Miss Spence, would you  
16 like to come forward?

17 JADE SPENCE (affirmed)

18 THE CORONER: Miss Spence, thank you very much. Do sit  
19 down. Can I suggest that you help yourself to a glass  
20 of water before we go any further. Thank you.  
21 Miss Spence, you see the microphone which is there. The  
22 sound in this room is quite difficult and we do need to  
23 be able to hear what you have to say, so I know it's  
24 going to be difficult, but please could you keep your  
25 mouth quite close to the microphone so that we pick up

1           what it is that you're saying.

2    A.    Okay.

3    THE CORONER:  I understand that you've made an enormous

4           effort to get here this morning and that you've walked

5           quite a distance because of the problems with the

6           transport; is that right?

7    A.    Yeah.

8    THE CORONER:  Thank you very much for taking that trouble

9           and making the effort to be here.  Thank you.

10   A.    That's okay.

11   THE CORONER:  Mr Maxwell-Scott, who's standing, is going to

12           ask you some questions on my behalf and then there will

13           be some other questions from some of the other

14           barristers in the room.

15   A.    Okay.

16   THE CORONER:  All right?

17   A.    Okay.

18   THE CORONER:  Thank you.

19                                    Questions by MR MAXWELL-SCOTT

20   MR MAXWELL-SCOTT:  Can you give the court your full name,

21           please.

22   A.    Jade Cheryl(?) Spence.

23   Q.    Back in July 2009, you were living in flat 65 at Lakanal

24           House; is that right?

25   A.    Yes.

1 Q. When did you start living in Lakanal House? Which year  
2 did you start living there?

3 A. 2009.

4 Q. Do you remember which month?

5 A. Not exactly.

6 Q. Had you been there for weeks or months?

7 A. No, just over a week, roughly.

8 Q. You're one of at least ten people who were residents in  
9 Lakanal House in July 2009 who are going to be giving  
10 evidence to this court, so we'd like to ask you, in the  
11 same way that we'll ask them, some general questions  
12 about your awareness of fire safety advice and of the  
13 layout of the building. Do you understand?

14 A. Yes.

15 Q. The point of doing that is so that we can build up  
16 a more complete picture of what residents such as  
17 yourself knew at the time.

18 A. Okay.

19 Q. If I could ask you to be shown a document that begins at  
20 page 1050. (Handed) Just take a moment. This is  
21 a four-page London Fire Brigade leaflet, finishing at  
22 page 1053. All I would ask you to do is in your own  
23 time just have a look and see whether you think you  
24 recognise it, whether you've ever seen it before. I'm  
25 not suggesting that you should have done or would have

1 done, but just your best memory of whether you recognise  
2 it or not. (Pause)

3 A. Can I answer?

4 Q. I didn't quite hear you?

5 A. I haven't seen this exactly before, but I've done --  
6 I've come across something similar when I was in school.

7 Q. Come across something similar when you were in school?

8 A. Yeah.

9 Q. Thank you. If you look at the two-page document that  
10 starts at page 1054. It's the same question. Just take  
11 as long as you need and see whether you think you  
12 recognise it, whether or not you think you've ever seen  
13 it before.

14 A. No. No, not this exactly.

15 Q. Not that specific document?

16 A. Yeah.

17 Q. But as you've said, it's quite similar to the previous  
18 one, isn't it, and you've seen something like it at  
19 school?

20 A. Yeah.

21 Q. Thank you. Had you, before July 2009, for any reason,  
22 ever looked at the London Fire Brigade website for  
23 advice about fire safety matters?

24 A. No.

25 Q. If you could look on in the bundle to page 1068. If I



1           just explain what it is.  If you look towards the bottom  
2           right hand corner there's the number 27.  Do you see  
3           that?

4    A.  Yes.

5    Q.  Then there's another page and then a third page which  
6           has a number 29 in the same corner of the page?

7    A.  Yes.

8    Q.  So this comes from a much longer document, pages 27 to  
9           29, we understand from a handbook.  Again, it's just the  
10           same question.  Take as long as you need and let us know  
11           whether or not you think you recognise it.

12   A.  I haven't seen this particular document, but like  
13           I said, when I was in school I did -- we did, like,  
14           a fire -- we went to that fire station and did, like,  
15           a fire ... so it reminds me of that.

16   Q.  So you haven't seen this particular document before?

17   A.  This in particular.

18   Q.  But as you've said very helpfully earlier, when you were  
19           at school you learned some matters to do with fire  
20           safety issues?

21   A.  Yeah.

22   Q.  Thank you.  You can put that file away now.  I'm going  
23           to ask you some questions about what you knew of the  
24           layout of your flat, flat 65, and of the building,  
25           Lakanal House, as a whole.  It would probably help if

1 I showed you some images. You won't have seen this  
2 image before -- and do say whether or not you find it  
3 helpful -- but what it's intended to show is the layout  
4 of a flat similar to yours that had bedrooms with  
5 windows facing the west side of the building. So you  
6 can see on the monitor where my white arrow is, you have  
7 a green front door coming into a small hall area with  
8 a bathroom here, one bedroom here and then another  
9 bedroom with windows here. You can't see the bedroom in  
10 this 3D image because immediately above it there's  
11 a kitchen. There are stairs within the flat from the  
12 hall up to an entrance walking out onto the lounge.  
13 Does that help you at all to remember the layout of your  
14 flat?

15 A. Yes.

16 Q. Obviously you won't have had an opportunity to see the  
17 flat since you left it on 3 July 2009, and you gave  
18 a witness statement a couple of days later on  
19 5 July 2009. Do you think that your memory of events  
20 when you gave the statement is significantly better than  
21 it is now, some three and a half years on?

22 A. No. Are you asking me if I think my memory's better  
23 now?

24 Q. Better when you gave your statement just after the fire?

25 A. Yeah, yeah.

1 Q. Would it help you to have a look at the statement that  
2 you gave at the time?

3 A. Yeah, yes. (Handed)

4 Q. So it's a printed-out copy of the statement. You can  
5 see that a date is given of 5/7/2009?

6 A. Yeah.

7 Q. The third paragraph says that your partner moved into  
8 the flat on 23 May 2009?

9 A. It doesn't say that.

10 Q. "On 23 May 2009 --"

11 THE CORONER: Are we just on the same page number?

12 MR MAXWELL-SCOTT: Page 27 at the bottom.

13 A. It's on the second ... yes.

14 Q. So on 23 May your partner moved in. Did you move in on  
15 the same day?

16 A. Yes.

17 Q. If you move down to the next paragraph, in the third  
18 line, you say:

19 "Upstairs there is a balcony. This is used as  
20 a fire exit."

21 A. Yes.

22 Q. If I can just show you that to refresh your memory. So  
23 this shows the upper floors, a typical upper floor such  
24 as the tenth floor of Lakanal House, and you can see  
25 marked with red arrows the description "fire escape

1 route along north-west balcony"?

2 A. Yeah.

3 Q. That is the balcony that you're talking about in your  
4 statement that was used as a fire exit; is that right?

5 A. Yes, yes.

6 Q. If I show you a photograph. Does that help you to  
7 remember the view along one of those balconies towards  
8 a door at the end?

9 A. Yes.

10 Q. That is a close-up view of that same door.

11 A. Yes.

12 Q. Had you ever been through that door? Did you know  
13 exactly where it led?

14 A. I think when we had moved in there, I might have, like,  
15 went out that way to just get familiar with, like, the  
16 surroundings, just to see where it went or -- I'm sure  
17 I went out there, yeah.

18 Q. Did you discover from doing so that if you went through  
19 two more sets of doors you would get onto the central  
20 staircase?

21 A. Yeah. Yes.

22 Q. Did you realise, either by walking all the way down the  
23 stairs or by thinking it through in your head, that that  
24 was a route that could be used, if necessary, to get all  
25 the way out of the building?

1 A. Yes.

2 Q. Did you know that there were 14 floors in the building?

3 A. I can't exactly remember but I'm sure probably at the  
4 time, yeah, I would have known.

5 Q. Did you know how many flats there were in the building?

6 A. Individually?

7 Q. The total number of flats in the building?

8 A. No.

9 Q. Did you know that all the flats in the building were  
10 essentially identical?

11 A. I didn't know, but I would have -- I would have assumed.

12 Q. So in other words that each of the flats had two floors?

13 A. Yeah. Yeah.

14 Q. If you had been, for example, standing outside the  
15 building and somebody had said to you: "I mean to go and  
16 visit my friend in flat 96", would you have been able to  
17 help them to get there?

18 A. Yeah. Yes.

19 Q. I'm now going to move on and ask you about the events of  
20 3 July itself. Is it right that you were in the flat  
21 with your partner's son, Marcus?

22 A. Yes.

23 Q. And at some point in the morning he fell asleep?

24 A. Yes.

25 Q. You do need to say "yes" rather than nodding, just so

1 the recording picks it up. Did there come a time when  
2 Marcus woke up?

3 A. Yes.

4 Q. I'm just going to show you an image of the flat. That  
5 is intended to show the downstairs of a typical flat,  
6 and that's intended to show the layout of your flat at  
7 the time of the fire. Does that help you to remember?

8 A. Yes.

9 Q. We can see the windows where my arrow is and we can see  
10 two bedrooms. Do you remember which bedroom Marcus was  
11 in?

12 A. Yes.

13 Q. Is it the one where my arrow is?

14 A. The arrow is, yeah.

15 Q. Thank you. After he woke up, is it right that you  
16 stayed with him in the bedroom for a little while and  
17 did his hair?

18 A. Yes.

19 Q. Did you then go back upstairs with Marcus?

20 A. Yes.

21 Q. Was that to the lounge?

22 A. Yes.

23 Q. Did there then come a time when you wanted to go back  
24 downstairs to get your mobile phone?

25 A. Yes.

1 Q. If you look on page 29 of your statement, it says in the  
2 third paragraph, just above the hole punch:

3 "I wanted to get my mobile phone. I'm not sure what  
4 time this was. I ran downstairs very quickly. Marcus  
5 is very clingy and I was shouting, 'I'll be back in two  
6 seconds.' Marcus was in his baby-walker, so I knew that  
7 he would be okay, but he was screaming for me to come  
8 back."

9 Is that right?

10 A. Yes.

11 Q. So you wanted to go from the lounge down into a room  
12 downstairs to get your phone as quickly as possible?

13 A. Yes.

14 Q. Which room were you going to downstairs?

15 A. To the bedroom where your arrow is.

16 Q. If you move on to page 31, do you see a second paragraph  
17 that begins "When I went into the bedroom"?

18 A. Yes.

19 Q. What that says is:

20 "When I went into the bedroom to pick up my mobile  
21 phone, I didn't hear, see, or smell anything strange in  
22 the room."

23 Is that right?

24 A. Yes.

25 Q. Then you said:

1            "I didn't really pay particular attention to  
2            anything but I thought I would have seen or smelt  
3            something."

4            Is that right?

5            A. Yes.

6            Q. So although you were only there for a very short time so  
7            that you could get back up to Marcus, you think that if  
8            there had been something on fire you would have seen it  
9            or smelt it at that time?

10           A. Yes.

11           Q. If you go back then to page 29. Back in the paragraph  
12           that we were looking at just a few moments ago, do you  
13           see, about six lines down, it says:

14           "I ran back upstairs."

15           A. Yeah.

16           Q. "There was a text from Ann-Marie saying she couldn't get  
17           hold of me. As I was running up the stairs I called  
18           Ann-Marie."

19           Is that right?

20           A. Yes.

21           Q. It says:

22           "I called her as I knew she would be coming back."

23           You had a conversation, and you go on to say you  
24           ended the conversation and you must have been on the  
25           phone for "only a few minutes".



1           If you could then be shown a schedule of telephone  
2           calls, we can help you to piece together when that  
3           telephone call was likely to have been. You're shown on  
4           this schedule in pink. Do you see that at 16.15 hours  
5           there's reference to you making a 34 second phone call?

6   A. Yes.

7   Q. Just above it, there's reference to you having received  
8           an SMS, in other words a text message?

9   A. Yes.

10   Q. So do you think it's probable that that's the phone call  
11           that you're describing in that passage in your witness  
12           statement we've just been looking at?

13   A. Yes, yes.

14   Q. So before the phone call, you'd been into the bedroom  
15           that you've shown us and you hadn't noticed any signs of  
16           fire?

17   A. Nothing, no.

18   Q. Then your statement goes on:

19            "As soon as I put the phone down to her, the smoke  
20            alarm starting going off."

21            Is that right?

22   A. Yes.

23   Q. So at the end of a call that finished just towards the  
24           end of 16.15, the smoke alarm went off and you  
25           immediately ran into the kitchen?

1 A. I didn't rush. I went to -- I just walked to the  
2 kitchen. I didn't rush there.

3 Q. Could you smell burning in the kitchen?

4 A. Not straight away. When I -- when I went in there and  
5 I was, like, trying to look to see maybe why the fire  
6 alarm was going off. Then the smoke -- I could smell  
7 burning.

8 Q. Did you discover that there wasn't a fire in the  
9 kitchen?

10 A. Yeah.

11 Q. The kitchen is, of course, on the upstairs floor in the  
12 flat, and you say in the statement:

13 "Inside the kitchen there is a window that allows  
14 you to look into the hall and downstairs. I looked  
15 through this window and could see thick black smoke  
16 coming up the stairs."

17 Is that right?

18 A. Yes.

19 Q. You wanted to check straight away what was happening, as  
20 it started to get dark. Marcus was still upstairs in  
21 the lounge; is that right?

22 A. Yeah, yes.

23 Q. You say in the statement that you ran downstairs,  
24 leaving him in the walker, and halfway down the stairs  
25 you could feel it starting to get very hot?

1 A. Yes.

2 Q. Over the page, the statement says:

3 "I went to the bedroom. The bedroom door was open."

4 Which of the bedrooms are you describing there?

5 A. The bedroom that your arrow's on.

6 Q. Thank you. When you looked into the bedroom, did you

7 see that one corner of the bedroom was on fire?

8 A. Yes.

9 Q. With my assistance and the arrow, can you tell me which

10 corner was on fire? Was it one near the windows or away

11 from the windows?

12 A. Near the windows. I think that might be a radiator on

13 the left hand side.

14 Q. Was it this corner here?

15 A. Yeah, that corner there.

16 Q. Thank you. Then, moving on in the statement, in the

17 same paragraph, do you see a sentence where it says:

18 "I ran into the bathroom which is opposite and

19 thought: I must get water."

20 A. Yes.

21 Q. But you found that you didn't have anything to put it in

22 and due to how big the flames were, you thought you

23 would never be able to put it out yourself?

24 A. Yes.

25 Q. Whilst you were thinking about what to do, did you then

1           hear Marcus coughing upstairs?

2    A.   Yes.

3    Q.   And no doubt what was the most important thing in your  
4           mind at the time was to make sure that Marcus got out  
5           safely; is that right?

6    A.   Yeah, yes.

7    Q.   So did you run upstairs and get him?

8    A.   Yes.

9    Q.   If you look in the next paragraph of the statement, you  
10           say:

11                "When I got upstairs, I picked up Marcus and then  
12                tried to call Ann-Marie on her mobile, but it said no  
13                answer."

14                If you look again at the list of telephone calls, do  
15                you see at 16.18 a three-second telephone call from you  
16                to Ann-Marie?

17   A.   Yes, yes.

18   Q.   Immediately after that in your statement you said:

19                "I then called 999 from my mobile."

20                Do you see on the list of telephone calls that at  
21                16.18 there is a record of the telephone call that you  
22                made calling 999 to the London Fire Brigade?

23   A.   Yes.

24   Q.   That call lasted for just over two minutes?

25   A.   Yes.

1 Q. When you made that call, did you remain in the flat for  
2 the whole of that call or not?

3 A. No.

4 Q. What did you do?

5 A. I was going through the fire exit exiting through the  
6 back way.

7 Q. Did you go out of the front door of your flat or from  
8 somewhere else?

9 A. I was going from the balcony door in the -- on the  
10 sitting room.

11 Q. Marcus was upstairs when you picked him up. So you went  
12 out of the lounge side, did you say?

13 A. Yeah, the lounge side.

14 Q. The lounge side, through one of the doors we've seen  
15 a photo of, and then made your way down through the  
16 central staircase?

17 A. Yeah.

18 Q. Remaining on the telephone to calling 999 as you did so?

19 A. Yes.

20 Q. I think it's right that after you had gone out of the  
21 building you met up quite shortly afterwards with  
22 Ann-Marie?

23 A. Yes.

24 Q. Did you remain at the scene, or did you leave?

25 A. I remained there for -- for a little while.

1 Q. Did anybody come and talk to you about what had  
2 happened?

3 A. No. I remember trying to talk to a police officer.  
4 I was trying to talk to him. I don't remember anybody  
5 coming to talk to me.

6 Q. Thank you very much. Those are my questions. There may  
7 be some others.

8 THE CORONER: Mr Hendy.

9 MR HENDY: Thank you, madam. Madam, I have no questions at  
10 all, but my clients have asked me to say to you that  
11 however you feel about this, you should not feel guilty.  
12 That fire could have started anywhere at any time.

13 A. Thank you.

14 THE CORONER: Thank you. Does anybody else have any  
15 questions for Miss Spence?

16 Members of the jury, do you have any questions?  
17 What question would you like to put?

18 THE FOREMAN OF THE JURY: I was just wondering if Jade  
19 recalls what was in the corner when the fire started,  
20 whether there was an appliance or, say, just the  
21 radiator.

22 THE CORONER: Well, members of the jury, that's an area that  
23 I've decided it's not necessary to explore. The fire  
24 started within flat 65 and the real issues that we'll be  
25 looking at relate to matters other than that. So that's



1 a microphone.

2 THE CORONER: Yes, indeed. Dr Mansi, do sit down. You gave  
3 an oath on Monday and you're still bound by that. Yes,  
4 thank you.

5 MR MAXWELL-SCOTT: Madam, I'm sure they're on their way, if  
6 you're happy to remain in court.

7 THE CORONER: Yes, I am, if everybody else is happy to. Do  
8 sit down and we'll just wait for them to come. (Pause)  
9 It looks as if the firemen are ready to come in, so  
10 please could you ask them to come in.

11 Yes, gentlemen, thank you very much for coming in.  
12 If you would like to come forward, if you could come up  
13 to the front, that would be helpful. Thank you.  
14 Gentlemen, thank you. If you would just stop here for  
15 a minute. These are members of the jury and it's the  
16 jurors and the family members who most need to see what  
17 it is that you have to demonstrate. Dr Mansi, who's  
18 sitting behind you, is just going to talk through some  
19 of the items of equipment. I leave it with you for the  
20 moment and Mr Maxwell-Scott.

21 Questions by MR MAXWELL-SCOTT

22 MR MAXWELL-SCOTT: Dr Mansi, if you could first describe  
23 what it is that the firefighters are wearing at the  
24 moment.

25 A. Okay. Would you rather me sit here for the transcript



1 or stand up?

2 THE CORONER: We need to be able to hear you, Dr Mansi, but  
3 if you can come forward and demonstrate and keep your  
4 voice up, that would be fine.

5 A. Okay. Can everybody here me in the jury? Okay. What  
6 you see here are two firefighters in their firefighting  
7 protective clothing that they would put on en route to  
8 the fire scene. So they would get on the back of the  
9 fire engine and put on their fire boots you can see  
10 here, and their overtrousers, and their tunics. The  
11 overtrousers have braces on and protect them from fire  
12 and other heat that may harm them. They have a light  
13 here, a hand lamp, and a radio, as you can see, fitted.

14 So they would put this on en route to an incident,  
15 and they would also put on their fire helmets. Their  
16 fire helmets have built in visors to protect them. They  
17 also have gloves, as you can see, to protect their  
18 hands. So they are very well-protected from any heat  
19 sources that may harm them.

20 They also have flash hoods that they put on when  
21 they wear breathing apparatus sets, as you will see when  
22 they start to put those on.

23 Q. Just to summarise Dr Mansi, is this what the  
24 firefighters would probably look like when they got off  
25 an appliance as it pulled up at the scene?

1 A. Yes, it is. This is how they would then get off of the  
2 fire engine. Are there any questions from that? Okay.

3 If they are then instructed at the fire scene, or  
4 any other incident, to wear breathing apparatus, on the  
5 fire engines that you have in your glossary, the pump or  
6 the pump ladder, they would have this type of breathing  
7 apparatus set which we'll go through in a moment, and  
8 I'm quite happy to pick it up for you. There we are.  
9 This is the standard duration breathing apparatus set,  
10 and you have the duration of what they calculate the  
11 time to be in your glossary.

12 If the firefighter is instructed to put on the  
13 breathing apparatus set, they would go back to the fire  
14 engine -- or they may be instructed as soon as they pull  
15 up at the incident -- to put on their breathing  
16 apparatus. The breathing apparatus is fitted in cradles  
17 behind their seats, so because they are heavy they would  
18 put the straps on while the cylinder is attached to the  
19 cradle, making sure the straps are secure. They would  
20 then release a handle letting the cylinder could come  
21 out of the cradle. They would then be taking the full  
22 weight of the cylinder on their backs. They would step  
23 stop off of the fire engine, using the handle, stepping  
24 down backwards and use it to secure the complete set.

25 What we'll do now is show you how it would be done.

1           If you can hold it at the back. If the firefighter had  
2           to put this on off of the fire engine, for whatever  
3           reason, then they would be asked by something to help  
4           them to put that cylinder on their back while they  
5           secured the straps, as you can see.

6           I'll just remind you: this cylinder is a standard  
7           duration breathing apparatus carried on the fire  
8           engines, the pump and the pump ladder. So you can see  
9           the shoulder straps here take the weight of the cylinder  
10          and the set. The firefighter then pulls the waist strap  
11          to get the set in a comfortable position on his or her  
12          back, making sure that the air tubing and the distress  
13          signal unit -- we talked about the bodyguard, which I'll  
14          explain in a minute -- is not obstructed within the  
15          straps, and adjusting the shoulder straps so that the  
16          whole set is comfortable.

17          So here we have the distress signal unit, the  
18          bodyguard that we were talking about, and this is the BA  
19          tally, which would have the wearers' name on it and also  
20          have the set number and the time that the firefighter is  
21          committed into the incident is also recorded on here.  
22          There is the radio which the firefighter has on his  
23          tunic and this is the face mask, with the demand valve.

24          So the firefighter, when he or she is ready to go  
25          into the incident, would report to the bridgehead or the

1 entry control point -- and in Lakanal's case it was the  
2 bridgehead on the 7th floor -- and the entry control  
3 officer would have this board, which is the BA entry  
4 control board. On here -- shall I show them?

5 THE CORONER: Yes, please do.

6 A. I'll hold it up so you can see. On here you have the  
7 tally goes in this slot, the yellow tallies from the BA  
8 set. So you can say who is wearing that set and they  
9 would calculate, from this little chart here, the  
10 pressure that's in the set and when they expect the  
11 whistle, which is the safety device, to activate on the  
12 set. If that activates it means that the wearer should  
13 be leaving the incident because they're getting low on  
14 air.

15 It says the location of the team -- so it might be  
16 the 9th floor of Lakanal -- and any other comments:  
17 searching, rescue, firefighting. That can hold, as you  
18 can see, quite a number of BA wearers. So the person  
19 that's controlling this board is looking after the  
20 safety of the wearers that are going into the incident.

21 THE CORONER: Dr Mansi, could I just ask you to repeat that  
22 demonstration for the benefit of those in the room, and  
23 I'd like to see it as well please, if that's all right.  
24 If you have it sideways on, we can call see it.

25 A. Can everybody see this? So we have a BA entry control

1 board here that has a clock that is checked each day to  
2 make sure it is accurate. The breathing apparatus tally  
3 comes from the distress signal unit, the bodyguard slots  
4 into one of these, and in there will be the wearer's  
5 name and the pressures within their set. From this  
6 board here, it's calculated how much air they have in  
7 there, how long they should be in there, and at what  
8 time their whistle should activate, and it is  
9 a guidance. And we have discussed that depending on the  
10 duration and the efforts that are being made, the air  
11 may last a bit less or for longer.

12 But that's the safety margin, the time of whistle.  
13 If they haven't come out by that time then the entry  
14 control officer would take action to ensure that they do  
15 come out.

16 THE CORONER: Dr Mansi, we're going to hear evidence from  
17 a number of witnesses as to how this all worked.

18 I think it's really just a question of demonstrating  
19 what it looks like so people will understand what we're  
20 talking about when witnesses are actually talking about  
21 it. I don't need a great deal of discussion, thank you.

22 A. Okay, madam.

23 MR MAXWELL-SCOTT: If you just tell us what each of the  
24 columns has written at the top of it.

25 A. This has "identification" in the first column, which

1 identifies the name of the wearer; the time of whistle,  
2 when the safety whistle activates; the location of that  
3 breathing apparatus team, where they're working, and any  
4 other remarks, perhaps what they are doing, search and  
5 rescue, firefighting, et cetera.

6 THE CORONER: Thank you.

7 A. This set is the extended duration breathing apparatus  
8 which is carried on the fire rescue units, and again  
9 that's in your glossary. You can see here that this set  
10 is heavier, and it has two cylinders attached to it, and  
11 it's distinguished by the orange/reddy cover. Again,  
12 there's a picture in your glossary.

13 THE CORONER: Is the single cylinder always blue and the  
14 double cylinder always covered in orange?

15 A. Yes, it is.

16 THE CORONER: Thank you.

17 A. It's to distinguish between the two. The equipment is  
18 the same, the straps are the same and the tally is  
19 differentiated -- or it was in 2009. It was still  
20 a yellow tally, but it had a red stripe across it so you  
21 could tell that it was extended duration. This tally  
22 here is the new tally which was changed to red and you  
23 have the pressure gauge system here, and that is the  
24 reference.

25 THE CORONER: Thank you very much. That's very helpful. Do

1 we have any questions?

2 Questions by MR HENDY

3 MR HENDY: Could I just ask what the weights of the  
4 cylinders are, how much is it they are carrying?

5 A. I would have to check that.

6 Q. Don't worry.

7 A. I've just been informed that this was 13 kilogrammes and  
8 this is 23 kilogrammes.

9 THE CORONER: Is that when charged or not?

10 A. Yes.

11 MR HENDY: The second question was because the tallies have  
12 the firefighters' names on them, presumably the tally  
13 and the breathing part of the equipment is personal to  
14 that firefighter but obviously the cylinders can be  
15 changed?

16 A. Yes, and the duty of the firefighter that takes over  
17 that set when they come onto shift is to do a full check  
18 of the air pressure and the condition of the set, every  
19 single change of shift, and then they put their name on  
20 it and they sign a logbook to say that they've filled  
21 that in and done those checks.

22 Q. Finally, assuming that the firefighters haven't got  
23 rigged with BA while they're in the unit, in the  
24 appliance, but they are on the fire ground and they're  
25 told to get rigged, what's the sort of time estimate for

1 getting rigged and ready to -- for action, with the face  
2 mask on?

3 A. So this about off the appliance?

4 MR HENDY: Yes.

5 A. Again, depending on where the appliance is and where  
6 they are, once they get to the appliance, it's as quick  
7 as you saw here, probably a bit quicker.

8 Q. Thank you very much.

9 THE CORONER: Any other questions?

10 Members of the jury?

11 Gentlemen, thank you very much for bringing in the  
12 equipment and for demonstrating to us. That was very  
13 helpful. Thank you very much indeed.

14 Yes, Mr Maxwell-Scott.

15 MR MAXWELL-SCOTT: Madam, I think that concludes the  
16 evidence for the morning.

17 THE CORONER: Very well. So just looking at the timetable,  
18 it's 11.30 now. Are we still looking at a start time of  
19 1.30? I see nods from the floor.

20 Members of the jury, is that going to be convenient  
21 to you if we start again at 1.30? Very well. In that  
22 case, if you'd like to go with Mr Graham now, and if you  
23 could be back in good time, please, to start again at  
24 1.30. Thank you.

25 (11.39 am)



1 (The short adjournment)

2 (1.28 pm)

3 THE CORONER: Thank you, do sit down.

4 Yes, before we ask the jury to come in, I've been  
5 handed a couple of questions from the jury. I haven't  
6 had time to copy them for the advocates, but if I just  
7 read them out I think that will be sufficient. The  
8 first is this:

9 "What date did Jade Spence move in, end of May or  
10 end of June?"

11 In brackets after that:

12 "(Relevance: how familiar was she with the building  
13 when in panic?)"

14 The second question:

15 "Does Jade Spence recall which windows and doors  
16 were open as she left? (Bedroom door and kitchen window  
17 already mentioned)."

18 If someone could just remind me of the correct date  
19 and I'll pass that on to the jurors. That is the date  
20 when Jade Spence moved in. I can do that very simply.  
21 Unless I have submissions to the contrary, I'm proposing  
22 with the other two questions to say that Jade Spence has  
23 now left the building and we're unable to ask her those  
24 questions directly.

25 MR MAXWELL-SCOTT: Madam, Jade Spence said two different

1 things about the date when she moved in.

2 THE CORONER: Right.

3 MR MAXWELL-SCOTT: She talked about initially moving in  
4 a week or so earlier, but then she was referred to  
5 a date of 23 May 2009 and agreed that she would have  
6 moved in at the same time as her partner then.

7 THE CORONER: Thank you very much. That's very helpful. As  
8 to the other two questions, do I have any other  
9 submissions contrary to what I've just outlined? Thank  
10 you very much. Could we ask the jurors to come in then,  
11 please. Thank you.

12 (In the presence of the Jury)

13 THE CORONER: Yes, good afternoon, members of the jury.  
14 Welcome back. Thank you for the paper with questions  
15 which you put in over the break. The first question  
16 which you asked was the date on which Jade Spence moved  
17 in, and the evidence that she gave covered a couple of  
18 points. She said that she had moved in a week or so  
19 earlier, but then, when Mr Maxwell-Scott clarified this  
20 with her, she agreed that she moved in on 23 May, at the  
21 same time as her partner. So I hope that that answers  
22 that question for you.

23 Then you raised a couple of points as to Jade  
24 Spence's familiarity with the building when she was in  
25 a panic, as you've identified it in your question, and

1           asked whether she recalls which windows and doors were  
2           left open as she left. Well, the short answer to that  
3           is that Jade Spence has now left the building and has  
4           finished giving her evidence, so we're not able to raise  
5           those questions specifically with her now. What I  
6           suggest is that I just keep those in mind and if, in the  
7           light of evidence that we hear from others, it becomes  
8           sensible to ask Jade Spence to come back, if we're able  
9           to ask her to, then we can deal with that. I suggest we  
10          put that on one side for the moment. All right? Thank  
11          you very much.

12                        Yes.

13   MR MAXWELL-SCOTT: Madam, the next witness is Barry Willett.

14   THE CORONER: Thank you very much. Mr Willett -- is he in  
15          court or can he be found? Would you like to come  
16          forward, please.

17                                BARRY WILLETT (affirmed)

18   THE CORONER: Mr Willett, thank you very much. Do sit down  
19          and do help yourself to a glass of water.

20   A. Thank you.

21   THE CORONER: You'll see the microphone in front of you is  
22          switched on. You need to be fairly close to it so that  
23          your voice is amplified by it. If you could keep your  
24          voice up at all times it would help, because the sound  
25          in here is not very easy.

1           Mr Maxwell-Scott, who's standing, is going to ask  
2           questions of you on my behalf, and then there'll be  
3           questions from others. Thank you.

4                           Questions by MR MAXWELL-SCOTT

5   MR MAXWELL-SCOTT: Good afternoon, Mr Willett. Can you give  
6           the court your full name.

7   A. Barry Mark Willett.

8   Q. I'm going to be asking you questions about the fire at  
9           Lakanal House on 3 July 2009. Is it right that at that  
10           time you had been employed by the London Fire Brigade  
11           for approximately eight and a half years?

12   A. Yes.

13   Q. Do you still work for the London Fire Brigade?

14   A. I do.

15   Q. I know that in any organisation things change from time  
16           to time. Unless I indicate otherwise, my questions  
17           today will be directed to how things were done on or  
18           before the date of the fire. Is it right that you were  
19           a crew manager at the time of the fire?

20   A. Yes.

21   Q. Can you explain to the members of the jury what that  
22           means?

23   A. On a watch there will be a -- the watch will be managed  
24           by a watch manager and under him there will be two crew  
25           managers who are second in command of the watch and

1 assist in the running of the watch and also will cover  
2 the watch manager's absence, riding in the fire engine  
3 in his position and at a two-appliance station, as  
4 Peckham was, would also ride in charge of the second  
5 fire engine.

6 THE CORONER: Mr Willett, we have a couple of chaps here who  
7 are typing and giving a transcript, and you are speaking  
8 a little bit fast for them, so if you could speak a bit  
9 slower so they can make a note that would be helpful.

10 MR MAXWELL-SCOTT: Do I understand from that that when  
11 a fire engine travels to an incident it needs to have  
12 someone of crew manager rank on it?

13 A. Yes.

14 Q. It could be a crew manager or it could be a watch  
15 manager?

16 A. Yes.

17 Q. But it can't just be four firefighters?

18 A. No.

19 Q. As in that's correct?

20 A. Yes, that's correct.

21 Q. Do you remember in what year you became a crew manager?

22 A. 2006.

23 Q. At the time of the fire, I believe that you were based  
24 at Peckham fire station?

25 A. That's correct.

1 Q. Do you remember what year you started working there?

2 A. 2006.

3 Q. As you've already said, it was a two-appliance fire  
4 station with a pump and a pump ladder?

5 A. That's correct.

6 Q. Is it right that approximately 45 people worked at that  
7 fire station?

8 A. Yes, but not all at the same time.

9 Q. I was going to come onto that, because you operate  
10 a shift system, don't you?

11 A. Yes, we do.

12 Q. You understand, of course, that you're the first witness  
13 from the London Fire Brigade who's involved in the  
14 incident?

15 A. I do.

16 Q. And therefore it's useful to ask you some  
17 introductory-type questions so that we understand what  
18 things mean. Turning to the shift system, is it  
19 described in terms of colours? So there's, for example,  
20 a green shift and a white shift?

21 A. Yes, there is.

22 Q. How many different shifts are there?

23 A. There's four different watches: red, white, blue and  
24 green.

25 Q. Does each shift last for the same length of time?

1 A. No, the night shifts then were longer than the day  
2 shifts.

3 Q. You, I believe, were on the green watch at the time?

4 A. That's correct.

5 Q. And you would, therefore, do a mix of sometimes being on  
6 days and sometimes being on nights?

7 A. It's a constant rolling shift pattern: two day shifts  
8 followed by two night shifts, followed by rest days.

9 Q. Would there ordinarily be a handover at the end and  
10 beginning of each shift?

11 A. Yes.

12 Q. Is there, therefore, time scheduled when both the shift  
13 that is coming towards the end of its duty and the shift  
14 that is arriving on duty are at the fire station at the  
15 same time so that they can discuss matters?

16 A. There's nothing formally in place as a handover period,  
17 but the oncoming shift always get there with a few  
18 minutes to spare, and we also, on each fire station,  
19 have what we call a handing-over book. Obviously, being  
20 operational fire station, it can be possible that when  
21 the oncoming shift come in the offgoing shift are  
22 actually still in attendance at another incident. Any  
23 points that need to be handed over to the oncoming shift  
24 are written into the handing-over book so that even if  
25 there's no-one there the oncoming shift can pick up the

1 handing-over book and see if there are any relevant  
2 points that need immediate attention.

3 Q. I think on the day of the fire at Lakanal itself, you  
4 were on duty from 9 in the morning until 6 in the  
5 afternoon?

6 A. That's correct.

7 Q. And were there eight of you in total on duty?

8 A. There was.

9 Q. Is it right that your first knowledge of the fire was  
10 a message that you received over a teleprinter?

11 A. That's correct, yes.

12 Q. Can you just explain to the members of the jury what  
13 that system is?

14 A. It's a system by which we receive orderings to  
15 incidents. It's a -- we have a dedicated room in the  
16 fire station called the watch room that has the  
17 teleprinter and all our map cards and atlases. When  
18 a call comes through, a tannoy voice comes in telling us  
19 that we've got mobilisation, all the lights in the fire  
20 station come on and in the watch room, the teleprinter  
21 will reel off the message that comes out in triplicate.  
22 The paper that goes into the teleprinter is a three-ply,  
23 so three copies of it come off. Two copies are torn  
24 off, one for each fire engine and the remaining copy  
25 stays on the teleprinter. We also have to acknowledge



1           this so that control know we've received the order in by  
2           pressing a red button on the control panel for the  
3           teleprinter.

4   THE CORONER: Not too fast, please, Mr Willett.

5   A. Sorry.

6   MR MAXWELL-SCOTT: I'm conscious I'm going to be asking you  
7           some detailed questions about events approximately three  
8           and a half years ago. You made a statement on  
9           11 July 2009, so under ten days after the event. Would  
10          it assist you to have reference to that?

11   A. Yes.

12   Q. It's at page 43. (Handed) So you have there your  
13          statement and it's dated 11 July 2009?

14   A. Yes.

15   Q. The part I'm referring to, the incident being noted by  
16          the teleprinter, is at the bottom of that page. It  
17          says:

18                 "At 16.21 hours we received an ordering via the  
19                 teleprinter to a fire in flat 65 on the 9th floor  
20                 Lakanal. The order was for both appliances to attend  
21                 the call."

22                 So that's the pump and the pump ladder from Peckham?

23   A. That's correct.

24   Q. Then, going on over the page:

25                 "I could see by looking at the call slip from the

1 teleprinter that there were two fire engines from the  
2 Old Kent Road also attending and an aerial platform."  
3 A. That's correct.  
4 Q. You then travelled to Lakanal House on a pump ladder?  
5 A. That's correct.  
6 Q. If you could take up the jury bundle and turn in it to  
7 tab 8. (Handed) Do you have that?  
8 A. I have that now, yes.  
9 Q. Can you assist us with who was travelling with you and  
10 who travelled on the other appliance?  
11 THE CORONER: Sorry, just wait a moment. Members of the  
12 jury, do you have that tab? Thank you.  
13 A. On the pump ladder would have been myself in charge,  
14 firefighter David Sharpe was driving and firefighters  
15 James Badger and Michael Farmer, I believe, were on the  
16 back.  
17 MR MAXWELL-SCOTT: And so the other four names there would  
18 have been on the pump?  
19 A. That's correct.  
20 Q. Did the two appliances effectively travel in convoy?  
21 A. Yes.  
22 Q. In your statement, just below where we were looking, you  
23 say:  
24 "On that day I was riding in charge of E371."  
25 A. That's correct.

1 Q. So does that mean that you would automatically become  
2 incident commander on arrival?

3 A. Yes.

4 Q. A sequence of events that the members of the jury have  
5 seen, which I don't need to take you to, indicates that  
6 your appliance arrived within three minutes of receiving  
7 the teleprinter message?

8 A. That's correct.

9 Q. And if, as you say, they travelled in convoy, that means  
10 both of those Peckham fire station appliances arrived  
11 within three minutes of the message?

12 A. That's correct.

13 Q. Is it right that the pump ladder carried on it something  
14 called an operational information folder?

15 A. Yes.

16 Q. I appreciate that it's a very short journey that you  
17 made in time to the scene, but did you look in the  
18 operational information folder on your way?

19 A. No.

20 Q. Did there come a time after you arrived at the scene  
21 when you looked in it?

22 A. No.

23 Q. Can you recall why not?

24 A. On the way to the incident, I received two radio  
25 messages from control, and as it was a very short

1 journey -- it was within three minutes, I believe it to  
2 be less -- there simply wasn't time for that one. On  
3 arrival at the incident, we had enough tasks to be  
4 getting on with and there was no information that  
5 I needed immediately from the operational information  
6 folder in order to complete those tasks to start with.

7 Q. Are you able to assist, from your own recollection, with  
8 whether anybody else at any later stage looked in the  
9 operational information folder?

10 A. No, I'm afraid not.

11 Q. You don't know either way?

12 A. I don't know.

13 Q. Moving to a slightly different topic, which is about the  
14 sorts of circumstances in which a firefighter might be  
15 required to visit a building like Lakanal House. So one  
16 obvious example, I would suggest, is an operational  
17 incident such as the fire on 3 July or a smaller fire on  
18 previous occasions?

19 A. Yes.

20 Q. Then they might visit in circumstances where there's no  
21 fire at all but carry out a home fire safety visit?

22 A. That's correct.

23 Q. Can you just explain to the members of the jury what  
24 a home fire safety visit is?

25 A. A home fire safety visit is when we visit members of the

1 public's homes and we offer them fire safety advice. We  
2 also look round their home to see if there's any  
3 potential dangers that we can see, such as overloaded  
4 plug sockets, dangerously stored items over cookers,  
5 anything that stands out as being a fire risk, and if  
6 necessary we'll also install smoke alarms into their  
7 home.

8 Q. So that would involve going into an individual's flat or  
9 the flats of a number of individuals?

10 A. That's correct.

11 Q. Is there also something called a familiarisation visit?

12 A. Yes, there is.

13 Q. Is that sometimes referred to as a 72D visit?

14 A. It is.

15 Q. Or as outside duty?

16 A. Outside duty encompasses various visits, of which a 72D  
17 visit is one.

18 Q. Can you explain to the members of the jury what  
19 a familiarisation visit is?

20 A. A familiarisation visit is when a crew from a fire  
21 station will visit a premises to familiarise ourselves  
22 with the layout, any fixed firefighting installations,  
23 the locations of hydrants in the streets, any security  
24 key codes required to gain access, whether we need drop  
25 keys to get in or a magnetic tab or a simple four digit

1 code. It's basically to build up knowledge of the  
2 station's ground.

3 Q. So we discussed three reasons when a firefighter might  
4 visit a building like Lakanal House: firstly because  
5 there's an incident, secondly a home fire safety visit,  
6 thirdly a familiarisation visit. Are there any others  
7 that ought to be added to that list?

8 A. Not that I can think of.

9 Q. Thinking about each of those in turn, for which of those  
10 types of reasons had you previously visited Lakanal  
11 House? Had you been there previously for attending  
12 a fire?

13 A. Not that I recall.

14 Q. Had you previously conducted a home fire safety visit  
15 there?

16 A. No.

17 Q. Had you previously been there for a familiarisation  
18 visit?

19 A. No.

20 Q. Does it follow from that that your evidence is that you  
21 had not been to Lakanal House before?

22 A. No. I had been there for other incidents other than  
23 fires. We attended shutting lifts and flooding  
24 incidents from radiators and overflowing sinks, burst  
25 pipes. So I had visited Lakanal on numerous

1 occasions -- several occasions, but not in -- not for  
2 a fire.

3 Q. I should perhaps have been slightly clearer. When we're  
4 talking about an operational incident, one might  
5 automatically assume it's a fire, but you are a fire and  
6 rescue service?

7 A. Yes, we do a lot more than just fires.

8 Q. So you hadn't done a home fire safety visit?

9 A. No.

10 Q. You hadn't done a familiarisation visit, but you had  
11 been there for incidents such as persons being trapped  
12 in a lift?

13 A. Yes. If I could add to that?

14 Q. Certainly.

15 A. Although we hadn't done a formal 72D incident, when we  
16 attend incidents such as shutting lifts, we usually take  
17 five minutes out after we've concluded that incident  
18 just to -- just to check on some of the fixed  
19 firefighting installations. There was a period in  
20 Southwark where there was a theft of a lot of dry riser  
21 outlets from high rise buildings so if we were ever in  
22 one we used to take a few minutes out just to walk up  
23 and down the stairs and just check on the general  
24 housekeeping of buildings and the locations of fixed  
25 firefighting installations and hydrants. But it wasn't

1 a formally recorded 72D visit.

2 Q. To the best of your recollection, before the fire at  
3 Lakanal House, had you been into any of the flats  
4 themselves?

5 A. I had, yes.

6 Q. Do you recall what year it was that you had last  
7 previously visited?

8 A. No.

9 Q. I'll come back to the topic of your knowledge of the  
10 layout of the building and the flats a little later.  
11 I'm going to return now to the events of 3 July. We'd  
12 reached the point where you were travelling to the  
13 scene, you got there in under three minutes of receiving  
14 the message, and is it right that as you approached you  
15 saw burning debris falling from the building?

16 A. That's correct, yes.

17 Q. And you had to drive either through it or under it,  
18 however you would describe it?

19 A. Yes.

20 Q. Did you know in advance where the dry riser main was  
21 located?

22 A. Yes. That's why we had to drive under the falling  
23 debris, so we could get to the proximity of the dry  
24 riser main.

25 Q. If I could ask you to have a look at this aerial



1 photograph to see if it assists, because it has some  
2 street names on it.

3 A. Yeah.

4 Q. Are you able to help the members of the jury with where  
5 your appliance stopped and where the dry riser main was?

6 A. I'm having trouble orientating myself to the map at the  
7 moment.

8 Q. I do apologise. I should point out that where my arrow  
9 is is Lakanal House.

10 A. Okay, yeah.

11 Q. North is at the top of the page. So where my arrow now  
12 is, where it says "Sedgmoor Place", is on the west side.

13 A. The dry riser main -- sorry, was that the question, the  
14 dry riser main?

15 Q. Yes, where's the riser main?

16 A. Where the arrow is at the moment, as you come back  
17 towards the bottom of the page, the dry riser main,  
18 I believe, would have been located on -- well, the  
19 building but just under the alcove there. Round about  
20 there, yeah.

21 Q. Thank you. Where did you get your pump ladder to stop?

22 A. Adjacent to the dry riser main.

23 Q. The pump from the same fire station, your fire station,  
24 arrived. Did it arrive at essentially the same time as  
25 you?

1 A. Yes, it did.

2 Q. And you became the incident commander?

3 A. That's right.

4 Q. And you gave some immediate instructions?

5 A. Yes.

6 Q. Did you give those to the crews of both appliances

7 together?

8 A. Yes.

9 Q. Is it right that in essence the immediate instructions

10 were firstly to Crew Manager Dennis to load the lift

11 with high rise kit, go up to the 7th floor and establish

12 a bridgehead?

13 A. That's correct.

14 Q. And simultaneously to others to set into the hydrant and

15 charge the dry riser main?

16 A. That's correct.

17 Q. Can you just explain to the members of the jury what is

18 involved in each of those tasks that you ordered?

19 A. Yes, certainly. The -- loading the lift -- we have in

20 our high rise firefighting policy a list of equipment

21 that should be taken up to a bridgehead, which is

22 a forward-mounting point of operations, which would be

23 beneath the floor that -- beneath the floor that the

24 fire's on. We have a drop lift -- lift key that we can

25 take control of the lift in the tower block so that only

1 we can control it. It brings the lift down to the  
2 ground floor. We can then dedicate a firefighter to be  
3 the lift man, put the equipment into the lift and take  
4 it up to two floors below the floor that the fire's on.

5 The dry riser main is essentially a vertical pipe  
6 that runs up through the building to take water onto  
7 outlets on each floor. There's an outlet on the outside  
8 of that and we will connect the fire engine to a hydrant  
9 in the street, and the water will come from the hydrant  
10 to the fire engine and then we'll run hose from the fire  
11 engine, connect it to the dry riser main and pump the  
12 water vertically up the building.

13 Q. Those were the two tasks that you instructed to happen?

14 A. That's correct.

15 Q. As I understand it from your statement, you then stepped  
16 back onto the grass verge which was the same side as the  
17 lifts -- in other words, the west side of the  
18 building -- to get an overall view of what was going on?

19 A. That's correct.

20 Q. Can you assist the members of the jury with what  
21 an incident command wallet is?

22 A. An incident command wallet is -- there's one carried on  
23 the front of every fire engine. It has a perspex board  
24 for drawing a map. It also has some boxes with  
25 categories to remind -- with reminders on, such as the

1 last time a message was sent, what messages have been  
2 sent, and it also contains a flap with compartments to  
3 put nominal role boards in. Each fire engine or officer  
4 coming onto an incident has a nominal role board which  
5 contains all the names of the members of the crew for  
6 that particular appliance. It's there so that you keep  
7 a register of who is in attendance at the incident.

8 Q. Was it used in that way at this incident?

9 A. Not initially.

10 Q. So not during the time you were incident commander?

11 A. No.

12 Q. Do you recall if there's any particular reason for that?

13 A. Initially when we turned up it would have required me  
14 dedicating a person to set that up and we didn't -- we  
15 only had enough people to get on with the tasks we had  
16 initially.

17 Q. Then following through what happened after you had taken  
18 those initial steps, we have seen in a sequence of  
19 events that the members of the jury have that at  
20 16.24 hours you made a "make pumps four" message?

21 A. That's correct.

22 Q. So at that time you had been at the fire ground for just  
23 under two minutes?

24 A. Yes.

25 Q. Can I just ask about why you did that, because you've

1           already told us -- and it's in your witness statement --  
2           that the teleprinter message that you had received  
3           effectively informed you that five appliances were being  
4           mobilised to the scene. That's right, isn't it?

5    A. That's correct. On the teleprinter order, the five  
6           appliances -- only four were pumping appliances, and of  
7           those four, one was only being sent on what we call  
8           watch manager cover. Because I'm not a watch manager,  
9           an incident such as this has to have a watch manager on  
10          it, so an additional appliance will be sent as a watch  
11          manager. So there's actually -- pumping appliances sent  
12          on it for firefighting purposes is three, although the  
13          fourth appliance will contain a firefighting crew.

14                 In addition to this, we do receive calls where we go  
15          out to a -- calls that are called as a fire at a tower  
16          block but turn out to be false alarms. By sending this  
17          message, it lets everyone else know who is coming onto  
18          this incident that it is an established fire and they  
19          are turning up to a fire and not a potential false  
20          alarm.

21    Q. Is it your recollection that at the time you sent the  
22          message "make four pumps" you had in fact recalled that  
23          five were coming?

24    A. Sorry, could you repeat the question?

25    Q. When you sent the message --

1 A. Yeah.

2 Q. -- was it in your mind that five appliances were coming  
3 in any event?

4 A. I knew five were coming but that wouldn't have made it  
5 a four-pump fire. It wouldn't have been a four-pump  
6 fire until I made it a four-pump fire.

7 Q. So it's not only a message about how many appliances you  
8 want to be there; it's also a message about the severity  
9 of the fire. Is that right?

10 A. Yes.

11 Q. It would probably assist you to look at the sequence of  
12 events that we have and the members of the jury have in  
13 their bundles. It's at tab 12 of the jury bundle. Do  
14 you have that?

15 A. I do have that, yes.

16 Q. If you look on the second page, just following the  
17 chronology, in around the middle of the page we see  
18 16.24.16 you sent the message "make pumps four".

19 A. Yes.

20 Q. And then, about half a minute later, there was a radio  
21 message to E351, the pump ladder coming from the  
22 Old Kent Road, stating that the smoke was at flat 79 and  
23 a caller was still on the line, and the operator asked  
24 E351 to investigate on arrival. Did you hear or take  
25 any particular note of that radio message?

1 A. I wouldn't have been able to hear that message. The  
2 radios that's transmitted over are only -- are fixed  
3 onto the appliances, onto the fire engines, and we were  
4 all remote from the fire engines at that time.

5 Q. So that was sent to the pump ladder that was on its way  
6 from the Old Kent Road. Then we can see at 16.26,  
7 according to this sequence, it reported in attendance at  
8 the incident?

9 A. Yes.

10 Q. And riding on that was Watch Manager Howling, wasn't he?

11 A. That's correct.

12 Q. As a watch manager, it would follow, would it not, that  
13 he would become the incident commander on arrival?

14 A. That's correct.

15 Q. Just turning over the page on this sequence of events,  
16 the second entry states that the aerial ladder platform  
17 from the Old Kent Road reported in attendance at 16.29.

18 A. Yes.

19 Q. Did you have any say in where it was positioned when it  
20 arrived?

21 A. No.

22 Q. Going back then to what Watch Manager Howling did when  
23 he arrived, is it right that he came over to you?

24 A. Yes.

25 Q. And the two of you had a conversation?

1 A. Yes.

2 Q. What did you say to him by way of briefing him?

3 A. I gave him a formal briefing which extended to what the  
4 incident was, what I had done, what messages I had sent  
5 and what the plan was for tackling the incident.

6 Q. Very briefly, what was the plan as you reported it to  
7 him?

8 A. Commit a crew from the 9th floor -- well, commit a crew  
9 from the bridgehead to the flat to firefight and to send  
10 a second crew from Old Kent Road appliances up to back  
11 up the first crew.

12 Q. At the time when the two of you had that conversation,  
13 did you have any awareness that somebody was making  
14 a 999 call from flat 79 stating there was smoke in the  
15 flat and that they were still on the line to brigade  
16 control?

17 A. I was aware that a message had been received but not of  
18 the details of that message.

19 Q. Do you know how you became aware of that?

20 A. I believe it was one of the crew members from the  
21 Old Kent Road brought the message over to Watch  
22 Manager -- Watch Manager Howling.

23 Q. Can you remember if this call in relation to flat number  
24 79 is something that Watch Manager Howling talked to you  
25 about in the handover?



1 A. I don't believe he talked to me about it. I believe he  
2 may have talked to the crew manager from  
3 Old Kent Road --

4 THE CORONER: Well, Mr Willett, if you don't know, don't  
5 speculate.

6 A. I do recall him giving him the tasking.

7 THE CORONER: I see. Sorry, in that case I interrupted you.  
8 Do you want to give your proper answer.

9 A. Okay. I recall Watch Manager Howling designating, or  
10 giving the task to investigate it, to -- I believe it  
11 was Crew Manager Clarke, who was the watch manager in  
12 charge of Echo 352, Old Kent Road's pump.

13 MR MAXWELL-SCOTT: You recall it because you overheard it?

14 A. Yes, he came to -- myself and Watch Manager Howling were  
15 doing the handing over and Crew Manager Clarke came  
16 over.

17 Q. Did Watch Manager Howling ask you any questions in the  
18 course of the handover?

19 A. I'm sure he did, but I don't recall them.

20 Q. Can you assist the court with how long that process took  
21 from him coming over first to speak to you and then him  
22 formally becoming the incident commander?

23 A. Two, maybe three minutes.

24 Q. Did you know at that time whether or not Watch Manager  
25 Howling had any prior knowledge of Lakanal House?

1 A. No.

2 Q. You didn't know one way or the other?

3 A. I don't know.

4 Q. Can you recall whether he asked you any questions about  
5 the layout of the building?

6 A. I don't recall.

7 Q. So pausing there, at the point at which you have stopped  
8 being the incident commander, it's 16.29 and we know,  
9 because you can see just slightly further down the  
10 sequence of events, that at approximately 16.32 the  
11 first crew were committed?

12 A. That's correct.

13 Q. And that was achieved with the London Fire Brigade  
14 having arrived at the scene just under ten minutes  
15 earlier?

16 A. That's correct.

17 Q. So within that ten minute or so period the crews had set  
18 into the fire hydrant and charged the dry riser main?

19 A. Yes.

20 Q. They'd taken high riser kit up to the 7th floor. They  
21 would have put on breathing apparatus?

22 A. Yes.

23 Q. They would have removed their tally keys?

24 A. Yes.

25 Q. And they were ready to attempt to fight the fire?

1 A. I wasn't on the bridgehead, but I assume that -- that is  
2 the procedure, so if the statements say that's the time  
3 they were committed, I would presume so.

4 Q. Assuming that to be correct, can you just assist the  
5 court with whether you regard that as a sequence that  
6 happened slower than expected, or quicker than expected,  
7 or is it about what you would have expected?

8 A. I would say that would be good. That's a -- it's what  
9 you would hope to achieve.

10 Q. I'll now ask you a little more concisely about your  
11 involvement at the scene after Watch Manager Howling  
12 took over as incident commander.

13 A. Okay.

14 Q. Is it right that initially you assisted by relaying  
15 messages between him and the bridgehead?

16 A. That's correct, yes.

17 Q. Did there come a time when you sent a message to Crew  
18 Manager Dennis to inform him there was now a fire on the  
19 same floor as the bridgehead and below it?

20 A. That's correct.

21 Q. Can I just help you with when that might have been. You  
22 see this photograph here on the screen at 16.48?

23 A. I do.

24 Q. The bridgehead would have been on the floor I'm  
25 indicating; is that right?

1 A. I believe so.

2 Q. If you look down, this is the fifth floor?

3 A. That's the fifth floor, yes.

4 Q. So at that point there is a fire developing on the fifth  
5 floor?

6 A. That is correct.

7 Q. So at around that time you would have sent a message to  
8 Crew Manager Dennis, who was inside the building on the  
9 7th floor, to tell him that?

10 A. I was actually speaking to Firefighter Badger, who was  
11 stood with Crew Manager Dennis, relaying messages to  
12 Crew Manager Dennis through Firefighter Badger, and yes,  
13 they were on the 7th floor.

14 Q. Did you see how it was that that fire on the fifth floor  
15 and the fire on the 7th floor, which started at a very  
16 similar time, how they started, what it was?

17 A. No.

18 Q. Then, later on in time, is it right that you and  
19 Firefighter Crowley rigged up in breathing apparatus?

20 A. That's correct.

21 Q. But then, instead of going straight into the building,  
22 you were tasked with laying out a jet at ground floor  
23 level?

24 A. That's correct.

25 Q. So just to explain to the members of the jury, is that

1 getting out a hose so that you can direct water?

2 A. Yes, a jet is a hose with a firefighting branch to  
3 deliver the water in a controlled manner on the end. We  
4 were tasked to get one of those -- to lay out a length  
5 of hose with a branch so we could direct a jet of water  
6 to the fifth floor.

7 Q. Does this photograph here, 16.49, show a jet of water  
8 being directed at the fifth floor?

9 A. It does.

10 Q. Your statement refers to that having been effective only  
11 to the fifth floor, but the water pressure having been  
12 good?

13 A. That's correct.

14 Q. Did there then come a time when there was a lot of  
15 activity and excitement and commotion on the east side  
16 of the building, which you were called to?

17 A. That's correct.

18 Q. Is that because members of the public were shouting up,  
19 telling somebody who was on a balcony not to jump?

20 A. That's correct. It was a member of the public on the  
21 balcony, I recall, tying sheets together, appeared to be  
22 looking like he was getting ready to scale down the  
23 outside of the building.

24 Q. If you look at this photograph from 17.09, is that what  
25 you're talking about?

1 A. I can't say for sure from that photo. It's out of  
2 context. I can't see the rest of the building, but  
3 quite possibly. And I wasn't aware of the precise time  
4 at this stage.

5 Q. Did there then occur an attempt to try and use an aerial  
6 ladder platform to rescue him?

7 A. That's correct.

8 Q. It got as far as rolling a car away from the building --

9 A. That's correct.

10 Q. -- to create the opportunity for an aerial ladder  
11 platform to move to the best possible location?

12 A. Yes.

13 Q. But it wouldn't have been able to reach that high up,  
14 would it?

15 A. I'm not entirely familiar with the technical  
16 specifications of the aerial ladder platform, and I'd  
17 say from that photo I can't tell and I don't recall  
18 which floor the member of the public was on.

19 Q. Were you then instructed by Watch Manager Payton to go  
20 to the 7th floor north corridor with two other  
21 firefighters?

22 A. There would have been a -- yes, I would have been, yes.

23 Q. The task was to look for occupants and firefight to the  
24 extent it was necessary to do so?

25 A. That's correct.

1 Q. Your statement records that you went with people who  
2 weren't from your fire station, somebody called Smith  
3 from Southwark, and somebody called Ian from Brixton?  
4 A. That's correct.  
5 Q. If I could just help the members of the jury with that.  
6 We're looking in the jury bundle at tab 8. On the  
7 bottom of the first page there's a reference to an Ian  
8 Wellman who was from Brixton fire station, attended on  
9 a pump?  
10 A. I can see that in the bundle, yes.  
11 Q. And at the top of the next page a Robert Smith who  
12 attended on a pump ladder from Southwark fire station?  
13 A. That's correct.  
14 Q. If you could be shown page 1037 in the bundles. Do say  
15 immediately if this is a document you've not seen before  
16 and don't recognise the format of.  
17 A. I've not seen this document before and I don't recognise  
18 the format.  
19 Q. I thought you probably wouldn't have done. Just to  
20 explain, it's data downloaded from the bodyguard system.  
21 Do you see the column to the far right of the page, just  
22 before the final column?  
23 A. Yes.  
24 Q. Two lines up from the bottom there's your name?  
25 A. I see that, yes.

1 Q. And then if you look in that row, there's a reference to  
2 the time 17.42?

3 A. Yes.

4 Q. For reasons which I won't go into in detail with you, it  
5 is thought that because of a clock being misset on the  
6 download computer the time ought to be recorded as  
7 17.30, and that would indicate that you were committed  
8 to enter the building at approximately 17.30 hours?

9 A. Yes.

10 Q. Does that sound about right?

11 A. It sounds likely.

12 Q. Did there then come a time when you briefed Watch  
13 Manager Payton that you'd searched all the flats on the  
14 north side of the 7th floor, except for one where there  
15 were cables hanging down?

16 A. That's correct.

17 Q. And then you came out of the building?

18 A. Yes.

19 Q. And then in due course you were instructed to go back in  
20 in breathing apparatus again?

21 A. Yes, but this would have been considerably later.

22 Q. Considerably later. In fact, if we look again at the  
23 same page we've been looking at, this would indicate it  
24 was after 7 pm?

25 A. Yes, quite possible.



1 Q. I'm now going to move away from asking about your  
2 involvement on the day of the fire itself to focus on  
3 your knowledge of the layout of the building in general  
4 and the flats specifically. Were you aware that there  
5 was a single central staircase?

6 A. Yes, I was.

7 Q. Just to make it clear, this is a series of questions at  
8 least initially about knowledge you had before you  
9 arrived on 3 July.

10 A. Okay.

11 Q. Before 3 July, as you said, you'd been to the building  
12 before. Is it right that you were aware there was  
13 a single central staircase?

14 A. Yes, I was.

15 Q. Were you aware how many floors there were?

16 A. I don't recall if I knew previously, but I now -- I know  
17 now because there's been such a high profile incident.  
18 I couldn't honestly say if I recalled beforehand.

19 Q. Do you think before the fire you knew how many flats  
20 there were?

21 A. No.

22 Q. You don't think you knew?

23 A. I don't think I knew.

24 Q. Were you aware that the flats were what's sometimes  
25 called maisonettes, so flats on two floors with

1 an internal staircase?

2 A. I was aware that they were over two floors with  
3 an internal staircase, yes.

4 Q. Were you aware of how the flats in the building fitted  
5 together? In other words, the fact that there were --

6 A. No.

7 Q. -- some with front doors on the west side and some on  
8 the east side?

9 A. No.

10 Q. Were you aware that all the flats were essentially  
11 identical in layout inside?

12 A. Yes.

13 Q. Were you aware of how the flat numbering system worked?

14 A. No.

15 Q. Were you aware what the escape routes were from  
16 individual flats?

17 A. No.

18 Q. So just looking at that slightly more closely, were you  
19 aware that there was an escape route from the front door  
20 onto the central corridor and onto the central  
21 staircase?

22 A. So just talking about the actual front door of the  
23 flats? Yes.

24 Q. Because you'd obviously been in a flat?

25 A. Been through the front door of the flats, yeah.

1 Q. Presumably you would have been on the upstairs level of  
2 a flat as well, at some time?

3 A. Yes.

4 Q. Were you aware that on the upstairs of flats there were  
5 balconies on either side of the building?

6 A. Sorry, as in there was a balcony for each flat on either  
7 side of the building?

8 Q. On either side of the building?

9 A. No.

10 Q. Let's look at some photos just to be clear. This is  
11 just intended to be an example of a flat. As it happens  
12 it's flat 24 on the third floor.

13 A. Yes.

14 Q. It's a photo taken from the top of the stairs and it  
15 shows the lounge. You recognise --

16 A. I recognise that, yes.

17 Q. You see there's a door?

18 A. Yes.

19 Q. That's a close-up of the door, and that's the door open.

20 A. That's correct.

21 Q. That's the kitchen on the same floor.

22 A. Yes.

23 Q. Were you aware that there were kitchens and lounges on  
24 the same floor as each other, the upper floor of the  
25 flats?

1 A. I don't remember -- I'm afraid I don't recall.

2 Q. I understand you might not recall, but if you'd been on  
3 the upper floor and stood at the top of the stairs for  
4 any length of time you'd have seen that there was  
5 a kitchen and a lounge?

6 A. Yes, but I can't recall the exact last date that I went  
7 into a flat in Lakanal or Marie Curie, which is the  
8 identical block next to it. Flats are the predominant  
9 housing on the -- on the ground in Peckham. We were in  
10 and out of flats all day, every day. It's hard to  
11 recall the exact layout of every design of flat within  
12 the station's ground.

13 Q. Can you recall if you'd ever gone out of either the  
14 lounge door or the kitchen door or looked out of them to  
15 see what they led onto?

16 A. I don't recall. I don't think I did.

17 Q. I'll just show you some. That is a photograph taken by  
18 somebody who's just gone out of one of those doors,  
19 either the kitchen door or lounge door. You get the  
20 same view, essentially, whichever side of the building  
21 you go out of.

22 A. Yes. Yes, I'm familiar with this now.

23 Q. Familiar with it now?

24 A. Yeah.

25 Q. But it's difficult for you to say if you remember that

1 at the time?

2 A. Yeah.

3 Q. Can I ask you to have a look at this photograph. That's

4 the outside of the building.

5 A. Yes.

6 Q. Taken from the corner of Dalwood Street and Sedgmoor

7 Place.

8 A. Yes.

9 Q. I'm sure you recognise that view?

10 A. Yes, I do.

11 Q. If you look in that photograph, you can see that on

12 alternate floors there are balconies, can't you?

13 A. Yes.

14 Q. Before the fire, do you think you had any view on

15 whether it was possible to walk along the length of one

16 of those balconies?

17 A. I -- I don't think I ever had a view. It wasn't

18 a question I ever recall asking myself or investigating.

19 Q. Do you think you would have had any view on where the

20 balconies led to, if anywhere?

21 A. I don't recall.

22 Q. Before the fire, did you know whether or not there was

23 a central smoke alarm within the building?

24 A. I don't recall if I knew or not.

25 Q. Do you know if you had any understanding of whether or

1 not there was a central sprinkler system in the  
2 building?

3 A. I don't recall there being any sprinkler systems in any  
4 of the flats that we regularly went to.

5 Q. Turning now to knowledge that you gained of those types  
6 of issues to do with the layout of the building in the  
7 course of the incident itself?

8 A. Yeah.

9 Q. Looking at this photograph that we have up on screen,  
10 did there come time when you understood that it was  
11 possible to walk the length of one of these balconies?

12 A. Not during the incident, no.

13 Q. Do you agree that if you look at that photograph, one  
14 can see that there's nothing to prohibit somebody from  
15 walking up and down that balcony?

16 A. Not necessarily. On several flats there would be low  
17 level partitions as the sort of green barrier -- the  
18 light green barrier you can see there, many flats have  
19 partitions so that one flat's balcony is that flat's  
20 balcony and it's partitioned. So I would say you  
21 couldn't tell from that photograph whether there are  
22 partitions or not.

23 Q. I'll show you a close-up photograph. You may say the  
24 same thing, but certainly you can see from that, can you  
25 not, by the post I'm identifying, that there's nothing

1           behind it, there's no high level partition?

2    A.   There's no high level partition, no.

3    Q.   And you can see from that photograph a white door at the

4           end of the balcony, can't you?

5    A.   Yes.

6    Q.   Do you recall at any point in the incident having

7           an understanding of where that door led?

8    A.   No.

9    Q.   Do you recall any discussion about where it went?

10   A.   No.

11   Q.   And at the time when you first arrived, you didn't

12          yourself know; is that right?

13   A.   That's correct.

14   Q.   In the course of the incident, did you gain

15          an understanding of how many flats there were in the

16          building?

17   A.   I don't recall.

18   Q.   Let me show you a photograph. I'll just take you back

19          one. So this is the ground floor lift lobby?

20   A.   Yes.

21   Q.   If you look in the photograph you can see a sign.

22   A.   Yes.

23   Q.   And then the next photograph is a close-up.

24   A.   Yes.

25   Q.   I'm not necessarily suggesting you should have gone into

1 the lift lobby and checked the signs, but did you ever  
2 see that sign and thus know something about the number  
3 of flats and which floor they were on?

4 A. I don't remember going in there. When -- at the time  
5 I needed to go into the building, I had had a briefing  
6 of where I needed to go, I was told where to go, so --  
7 regarding which floor and where my task was. So during  
8 the course of the incident I had no need to investigate  
9 that sign in order to gain any knowledge from it.

10 Q. Do you think that there came a time during the incident  
11 when if somebody had said to you, for example: "Go to  
12 flat 58", you would have been able to make an educated  
13 and informed guess as to where flat 58 was in the  
14 building?

15 A. In my experience, the numbering on flats varies so  
16 differently it's -- it's not worth making an educated  
17 guess. You either know or you go and find a sign like  
18 that which would tell you what floor flat 58 was located  
19 on. I wouldn't have made an educated guess; I would  
20 have gone and found out for sure.

21 Q. Perhaps I'm not being completely clear. What I'm trying  
22 to get at is there was a point in time when you ceased  
23 being incident commander but you were getting radio  
24 messages?

25 A. Yes.



1 Q. And some of them had flat numbers in?

2 A. Not that I recall.

3 Q. Do you remember hearing flat numbers being talked about?

4 A. I don't -- I recall there being flat numbers discussed,  
5 but I couldn't tell you what those flat numbers were.

6 Q. I understand that, but when you heard flat numbers being  
7 talked about on the day, do you think there ever came  
8 a point when, in your mind, you could think: "Well, I've  
9 heard that flat number, that's on the fifth floor"?

10 A. No.

11 Q. That's what the west side looks like, if you're standing  
12 outside.

13 A. Yes.

14 Q. And you don't know what the flat numbering system is?

15 A. Not exactly, no.

16 Q. If you don't know the flat number --

17 A. No, I don't know the flat numbers, no.

18 Q. -- that essentially represents the view you have,  
19 doesn't it?

20 A. Yes.

21 Q. This is a graphic that represents what the flat numbers  
22 actually are for what you could see in the previous  
23 image, okay?

24 A. Yes.

25 Q. What I'd like you to assist the jury with as best you

1           can is if, at any stage in the incident, in your own  
2           mind, you got anywhere close to having that sort of  
3           mental picture when you looked up at the flats?

4    A.   No.

5    Q.   You didn't?

6    A.   No.

7    Q.   Can you recall whether anybody you were talking to ever  
8           had that sort of mental picture, as far as you could  
9           tell?

10   A.   I couldn't -- I couldn't answer that question, I'm  
11        afraid.

12   Q.   Do you recognise that as being the entrance to one of  
13        the corridors?

14   A.   Yes, I do.

15   Q.   Just on a point of detail, if you can assist us with  
16        what the rectangular panel is with a little bit of red  
17        writing, the area I'm trying to indicate with the  
18        cursor.

19   A.   Yes, I see that.  It's basically the same keys that we  
20        can use in the lifts.  It's a drop key that goes in  
21        there, enables us to override the four digit PIN  
22        required to enter it so that we can again access to the  
23        corridors.  It's a simple process of putting the key in,  
24        turning it and it would click and the door would open.

25   Q.   I think the London Fire Brigade have very kindly brought

1           one to court. Could you confirm that that is a drop  
2           key? (Handed)

3    A. That is a drop key. You hold that bit up and slide it  
4           into the hole, in which case that would drop and then  
5           there's protrusions there which will stop it against the  
6           metal and then twist it round and it just makes a click  
7           and the door will open.

8    Q. If I show you a close-up of one of those panels. So  
9           that's the door entry panel with flat numbers that one  
10          sees in this image.

11   A. Yes.

12   Q. Do you remember seeing one of those door entry panels on  
13          the day of the fire when you went in?

14   A. No. No, I don't recall seeing one.

15   Q. Can you have a look at this image. This is number 41.  
16          Firstly, perhaps the simplest question is: do you know  
17          what that's a picture of?

18   A. I couldn't say for all certainty, but I --

19   Q. So it's not a view you recognise?

20   A. No.

21   Q. So I won't ask you to guess. It is the other side of  
22          one of the doors at the end of the balcony. In other  
23          words, it's the other side of that door. Can you help  
24          us at all with whether the London Fire Brigade would  
25          carry with them anything that could open this door from

1 the side we're looking at?

2 A. Yes, we carry a piece of equipment on our appliances  
3 called a Halligan bar which we can use to open doors  
4 that open towards us.

5 Q. This one's rather heavier than a drop key, Mr Clark.  
6 (Handed) That's what you're describing?

7 A. That is what I'm describing. That is a Halligan bar,  
8 yes.

9 Q. So you don't have anything like a key to open this sort  
10 of door?

11 A. No.

12 Q. You use rather more brute force?

13 A. Brute force.

14 THE CORONER: Thank you.

15 MR MAXWELL-SCOTT: Just taking you now to a photograph of  
16 the outside of that building, the west side. It's  
17 a slightly close-up image. If I enlarge that for you,  
18 can you see some pigeon spikes?

19 A. I do.

20 Q. Do you remember if they were something you noticed on  
21 the day of the fire?

22 A. I don't recall noticing them specifically on the day of  
23 the fire, no.

24 Q. This is a photograph, I think, taken on the 10th floor,  
25 which shows some netting over one of the balconies.

1 A. Yes.

2 Q. Rather more visible than pigeon spikes. Do you remember  
3 if you had ever noticed netting at the building before  
4 the fire?

5 A. I recall I mentioned it in one of my statements, so in  
6 all likelihood, yes, I would have noticed it.

7 Q. Before the fire, or on the day of the fire?

8 A. On the day of the fire. It's -- most of the high rise  
9 tower blocks within -- on the station's ground had this  
10 fitted and pigeon spikes fitted to them.

11 Q. So it's not unusual?

12 A. No, it's an everyday occurrence.

13 Q. Just completing this set of questions about your  
14 knowledge of the layout of the building, from the point  
15 of view of you personally, did you have any opportunity  
16 on the day of the fire to talk to any residents who were  
17 gathered outside about the layout of the building or any  
18 particular questions you might have?

19 A. No. There was -- when we arrived there was no-one -- no  
20 members of the public in the area we turned up to, and  
21 I didn't speak to any members of the public throughout  
22 the period of the incident that I recall.

23 Q. Can you assist the jury with whether there were times  
24 when there were sufficient London Fire Brigade members  
25 of staff at the scene not tasked to do something

1 immediately who could therefore have been tasked to try  
2 and find out some information from residents?

3 A. At some point in the incident there would have been, but  
4 by this stage, I don't know for sure. But Southwark had  
5 representatives at the incident. The local authority  
6 liaison officers were quite visible on the day of the  
7 incident and obviously the area had been evacuated and  
8 a cordon had been put round there. But at some point  
9 during the incident there would have been a chance to --  
10 there would have been sufficient personnel there to talk  
11 to any member of the public, had they been able to find  
12 members of the public.

13 Q. I won't ask you about that in more detail because you've  
14 given your evidence about all the tasks that you  
15 personally allocated.

16 THE CORONER: Mr Maxwell-Scott, are you about to go into  
17 a new topic?

18 MR MAXWELL-SCOTT: In about two or three minutes, madam.

19 THE CORONER: All right. We'll have a short break then for  
20 the transcribers.

21 MR MAXWELL-SCOTT: Yes.

22 If somebody at the fire ground -- so, for example  
23 an incident commander who was involved at a later stage  
24 than you -- wanted to attempt to talk directly to people  
25 in flats in the knowledge that people in flats were

1           trapped, would there be any way in which that could be  
2           achieved in your own mind?

3    A.   Sorry, do you mean incident commanders on the ground  
4           talking to people who were trapped in their flats at  
5           that time?

6    Q.   That's essentially the topic, yes, because we know that  
7           if you're trapped in a flat and you call 999 then you  
8           speak to somebody at somewhere called brigade control  
9           who isn't at the scene.

10   A.   That's correct.

11   Q.   Who therefore has limited knowledge about what's  
12           actually happening at the scene.

13   A.   Yes.

14   Q.   Would there be a way in which, if somebody wanted to  
15           from the fire ground, they could try to get a line of  
16           communication to somebody in a trapped flat?

17   A.   No.

18   Q.   Would there be a way to ask people in brigade control to  
19           pass specific information to somebody in the flat?

20   A.   Yes, through the main scheme radio, which is the radio  
21           carried on all fire engines.

22   Q.   So somebody at the fire ground could communicate with  
23           brigade control and say, "Tell somebody in this flat to  
24           do this", for example?

25   A.   Yes.

1 Q. Or equally could say, "Please ask them this specific  
2 question"?

3 A. In theory, yes, it's possible. You appreciate  
4 communications -- or the way brigade communications work  
5 isn't my area of work and knowledge.

6 Q. I do. If you could have a look in the advocates'  
7 bundles at page 13.

8 A. Is that one of the ones I have?

9 Q. It's probably not, because it's the first one of these  
10 bundles. (Handed) I think you're looking at  
11 a photograph?

12 A. I am, yes.

13 Q. I want to go back two pages so you have a plan that  
14 looks like this.

15 A. Yes, page 13 on the bottom.

16 Q. Yes. It's a plan that shows the layout of corridors and  
17 where bedrooms are and where lounges and kitchens are?

18 A. Yes.

19 Q. Is that a plan that you ever saw on the day of the  
20 incident?

21 A. No.

22 Q. Madam, that's a convenient moment for a short break.

23 THE CORONER: All right, thank you very much. We'll have  
24 a short break so that the transcribers can have a break  
25 and the jurors can have a short break. Please could



1           everybody be back in this room by 2.55 by the clock at  
2           the back of the room, so this is literally a short  
3           break.

4           Mr Willett, you're part way through giving your  
5           evidence, and the strict rule which I ask you to adhere  
6           to, please, is that you must not talk to anyone at all  
7           about your evidence. That means nobody inside this  
8           building and nobody outside the building.

9           A. I understand.

10          THE CORONER: Thank you very much.

11                 Yes, members of the jury, if you would like to go  
12           with Mr Graham.

13          (2.48 pm)

14                                 (A short break)

15          (2.56 pm)

16          THE CORONER: Thank you, yes. Could the jury come back in,  
17           please.

18                                 (In the presence of the Jury)

19          THE CORONER: Thank you. Mr Willett, you are still on oath.

20          A. Yes.

21          MR MAXWELL-SCOTT: Mr Willett, I'm now going to move to  
22           a completely different topic, which is about  
23           pre-planning. More specifically, it's about some events  
24           that happened in the year or so before this fire and  
25           movements that were taking place, if I can put it that

1 way, within the London Fire Brigade to remind people to  
2 do certain things in relation to pre-planning.

3 A. Okay.

4 Q. Just by way of introduction, before we get there,  
5 slightly earlier back in time, you used to do, as  
6 a service, familiarisation visits which I think would  
7 have been known as section 11D visits?

8 A. That's correct.

9 Q. If we could just look at an example of one of those from  
10 2002. It's at page 1095 in the advocates' bundles.

11 (Handed)

12 A. Yes.

13 Q. I don't need to look at this document with you for very  
14 long, but presumably you recognise the layout?

15 A. I do.

16 Q. A fairly standard document?

17 A. Yes.

18 Q. This one happens to be 2002. It's an inspection, and if  
19 you look on the third page of it there's an opportunity  
20 to note any defects noted during the periodic inspection  
21 of dry rising main or firefighting lift?

22 A. Yes.

23 Q. Then there's a section that deals with dry rising main.  
24 That's right, isn't it?

25 A. Yes.

1 Q. And a section that deals with the firefighting lift?

2 A. Yes, that's correct.

3 Q. And then a section which is headed "Additional  
4 unsatisfactory fire safety matters requiring attention".

5 A. Yes.

6 Q. We have another example of one of those at Lakanal.  
7 This is the last one of these documents for Lakanal.  
8 Over the page, May 2004.

9 A. Yes.

10 Q. It's the same format. Do you recall doing these types  
11 of inspections not at Lakanal but at other properties on  
12 your patch?

13 A. I do, yes.

14 Q. To what extent would you look at things other than the  
15 dry rising main and the firefighting lift?

16 A. In any particular context, it's -- depending on the  
17 access we had to the building, we'd also be looking at  
18 hydrants on the outside so we could record how many  
19 lengths of hose we'd require to get to the hydrant, to  
20 the appliance, access for aerial appliances. Every  
21 building is unique, so every building's going to have  
22 its unique set of requirements that we -- that would  
23 raise questions when we attended.

24 Q. Would you look, for example, at escape routes?

25 A. Possibly. I don't recall ever looking at -- most flats,

1           they don't have -- if they do have a designated fire  
2           access it's usually quite obvious, but it would depend  
3           on the building.

4   Q.   When doing one of these types of visits, familiarisation  
5           visits, would you always have gone into an individual  
6           flat to see what it was like, or sometimes, or never?  
7           What would be your best recollection?

8   A.   Sometimes.

9   Q.   Obviously when you do a home safety visit then by  
10          definition you have to go inside?

11  A.   You have to go inside, yes.

12  Q.   When doing a home safety visit, would you discuss with  
13          the occupant their means of escape from that flat?

14  A.   Yes.

15  Q.   Just moving now to the period in the year before this  
16          fire.  If you have a look at the document which starts  
17          at page 1112.

18  A.   Yes.

19  Q.   That is headed "Borough plan for Southwark" and  
20          I understand that it's a document that was written  
21          in September 2008.  Just take a moment and have a look  
22          through it and tell us your best recollection of whether  
23          or not you'd seen it before.  I'm not necessarily  
24          suggesting you should have done, but just your best  
25          recollection.

1 A. I don't recall seeing this before.

2 Q. If you have a look on page 1121.

3 A. Yes.

4 Q. You'll see there are a number of aims set out in bullet  
5 points and the aim on this page is:

6 "Protection. Influencing and regulating built  
7 environment to protect people, property and the  
8 environment from harm."

9 A. Yes.

10 Q. Then it says in bold:

11 "What we will do during 2008/2009."  
12 And then the first bullet point is:

13 "We will inspect high rise buildings to gain  
14 information to assist with firefighting and other  
15 emergency events."

16 A. Yes, I see that.

17 Q. Do you remember any particular discussions or plans  
18 around how that was going to be achieved?

19 A. I don't recall, I'm afraid.

20 Q. If we move on to page 1127, please. This is a copy of  
21 a newsletter called Operational News.

22 A. That's correct.

23 Q. It's four pages, which comes out four times a year.

24 A. Yes.

25 Q. Presumably you are familiar with the format of that

1 newsletter?

2 A. I am, yes.

3 Q. Can you tell us and help the jury with whether that is  
4 something that is sent out electronically or is sent out  
5 as a hard copy to firefighters.

6 A. It's sent out electronically on the brigade intranet  
7 site that every firefighter can access, and also hard  
8 copies are sent to both the station managers of each  
9 fire station and also bundles to the station for  
10 dissemination between the four watches.

11 Q. Can you help as to what extent firefighters would be  
12 expected to read that document?

13 A. Essentially, it outlines training things and --

14 THE CORONER: Sorry, can I just stop you a moment just while  
15 we sort out the papers with the jury, otherwise they're  
16 not going to be concentrating.

17 A. Sorry. (Pause)

18 THE CORONER: Are you all set? Do you all have your copies?  
19 Yes. Thank you, carry on.

20 A. Okay, The Operational News, when it comes out, will  
21 outline training themes, topics that should be trained  
22 on. It's -- we don't work on a principle, generally  
23 speaking, of giving firefighters it to read. Most of  
24 these will be linked to a computer-based training  
25 package that it will be the responsibility of the watch

1 officers to deliver and record.

2 THE CORONER: Mr Willett, a moment ago you said that bundles  
3 were delivered for dissemination to the watches.

4 A. That's correct.

5 THE CORONER: Well, if it was disseminated to the watches,  
6 was it not for members of the watches to read?

7 A. Members of the watches are perfectly entitled to read  
8 them and they are left usually in the station office so  
9 people can read them, but the training itself is --  
10 because it's a computer-based package, will be delivered  
11 as a lecture to the whole watch.

12 MR MAXWELL-SCOTT: Just pausing there, in fact that's  
13 a slightly different point, isn't it? We're going to  
14 come onto training packages but what we're asking you  
15 about at the moment is it's a newsletter --

16 A. Yes, but it does link to the training.

17 Q. I appreciate that, but just pausing there, what it calls  
18 itself is a quarterly newsletter for all London  
19 Fire Brigade operational staff?

20 A. Yes.

21 Q. It's four pages long?

22 A. Yes.

23 Q. So it's 16 pages a year?

24 A. Yes.

25 Q. So coming back to the question, to what extent are all

1 London Fire Brigade operational staff expected to read  
2 it?

3 A. Is the question: are they expected to read it?

4 Q. Well, that's one question, yes. Let's deal with that  
5 question first.

6 A. I couldn't say whether they are expected to read it.  
7 It's certainly not -- there wouldn't be time put aside  
8 so everyone can sit down and read it.

9 Q. Did you used to read it?

10 A. Yes.

11 Q. So you would have read this back at the time  
12 around November 2008?

13 A. Yes.

14 Q. So if we have a look at it together. The story on the  
15 first page of it is about high rise incidents?

16 A. Yes.

17 Q. And what it says is as follows:

18 "We are all aware of the significant challenges  
19 present when dealing with fires in high rise buildings.  
20 Following the recent publication of generic risk  
21 assessment number 3.2 for high rise firefighting and the  
22 results of recent safety event investigations, the  
23 policy note for dealing with incidents in high rise  
24 buildings has been updated and reissued as policy number  
25 663, high rise firefighting."



1           Just pausing there, would you have known that  
2           generic risk assessment number 3.2 was a national policy  
3           document?

4    A.  No.

5    Q.  Would you have known that it was published in  
6           around September 2008?

7    A.  No.

8    Q.  The points which are drawn to the attention of the  
9           reader are as follows:

10           "The key elements of the operational procedure  
11           are..."

12           The first bullet point:

13           "Command function.  The incident commander is to  
14           remain at ground floor level to carry out command  
15           function."

16           Secondly, securing a water supply; thirdly, securing  
17           a firefighting lift; fourthly, establishing  
18           a bridgehead; and fifthly, committing crews.  Then  
19           there's a section on pre-planning.

20    A.  Yes.

21    Q.  It says:

22           "Fire crews should be familiar with all high rise  
23           premises on their ground and be aware of access, water  
24           supplies, security measures and fixed installations for  
25           firefighting and ventilation.  Building layout can be of

1 particular importance. In some blocks of flats, the  
2 front door can lead into the flat, up to the flat or  
3 down to the flat, all from the same level."

4 Then it says:

5 "Where appropriate, pre-planning information should  
6 be recorded in the operational information folder and  
7 shared with adjoining stations. In future, this  
8 information, if recorded by stations, will be available  
9 to all attending crews through the mobile data terminals  
10 being installed in pumping appliances in the coming  
11 months."

12 A. Yes.

13 Q. Just pausing there, I think it's right to say they  
14 hadn't been installed as at July 2009?

15 A. No, I don't think they were.

16 Q. Then you mentioned mandatory training.

17 If you turn to the final page of that document, it  
18 gives information about training packages. The first  
19 item is high rise incidents. So this links back to the  
20 story on the first page, doesn't it?

21 A. It does, yes.

22 Q. It's coloured in red, and if we look at the bottom of  
23 the page, red means:

24 "These training themes are mandatory for all  
25 watches."

1 A. That's correct.

2 Q. Then if you turn on to 1137. If I just explain what  
3 this is. This, as I understand it -- do correct me if I  
4 am wrong -- is a PowerPoint presentation training  
5 package?

6 A. That is correct, yes.

7 Q. Dated November 2008. It's called "High rise buildings  
8 and dealing with high rise fires". I'm assuming that it  
9 links back to the item in the newsletter we've just been  
10 looking at?

11 A. That's correct.

12 Q. Is this a package that would be delivered within fire  
13 stations by members of that fire station?

14 A. It is, yes.

15 Q. Is it given by watch managers?

16 A. Watch managers or crew managers, yes.

17 Q. Crew managers. My understanding from looking at it is  
18 that what we see in the box is a slide that will be  
19 shown if you were doing a PowerPoint presentation?

20 A. Yes.

21 Q. And then quite often there's a lot of text underneath  
22 which wouldn't be shown on the screen but would be part  
23 of the notes for the trainer?

24 A. That's correct.

25 Q. So if you just take a moment or two to refresh your

1 memory on whether you think you have seen these slides  
2 before.

3 A. I have.

4 Q. You have?

5 A. I have.

6 Q. Have you even the notes before?

7 A. I have, yes.

8 Q. Is that because you've given this training course?

9 A. That's correct; I have delivered this training package.

10 Q. In that case, I think it would be helpful if this were  
11 included in the jury bundle as well.

12 THE CORONER: Thank you. (Handed)

13 MR MAXWELL-SCOTT: It's probably helpful for the members of  
14 the jury and all concerned to note that it should be in  
15 tab 15 of the jury bundle.

16 THE CORONER: Thank you. That's helpful.

17 MR MAXWELL-SCOTT: Behind the document that we just looked  
18 at, which is the newsletter that linked to it.

19 Whilst people are putting that in their folders,  
20 just by way of clarification, this is a training package  
21 that you would have given at some point before the  
22 Lakanal House fire?

23 A. Yes. If you want me to add to that --

24 Q. Yes?

25 A. -- when The Operational News comes out, there's usually

1 a timescale allotted to the mandatory training by which  
2 time it has to be delivered in.

3 Q. Would you have given that to everyone at Peckham fire  
4 station, to your shift, or how would that have worked?

5 A. It would have worked on a watch basis. Each watch is  
6 responsible for delivering their own training and the  
7 watch manager will manage the way he delivers that.

8 Q. If we look at page 1140, so using the pagination at the  
9 bottom and the middle of the page. We can see there the  
10 aim is simply expressed:

11 "To familiarise personnel with high rise buildings  
12 and to give guidance and supporting information on  
13 dealing with fires in high rise buildings."

14 A. Yes.

15 Q. Over the page, objectives:

16 "List the key features of high rise buildings.  
17 Identify the hazards associated with high rise  
18 incidents. State the operational considerations in high  
19 rise incidents."

20 If I take you forward to page 1148. This is  
21 a section on pre-planning.

22 Just so we all understand how this works, the people  
23 whom you were giving the training to would have had that  
24 slide on the screen that's at the top of the page?

25 A. That's correct.

1 Q. And then they wouldn't have had the text that follows  
2 underneath?

3 A. No.

4 Q. That would have been in your teaching notes?

5 A. Yeah.

6 Q. And it would have been up to you to describe the slide  
7 and talk to the slide as you saw fit, using the notes?

8 A. Yes.

9 Q. Looking at some of what is said in the notes -- which we  
10 know you read, because you gave the course -- it says in  
11 the first paragraph:

12 "Regular familiarisation visits and pre-planning  
13 should be carried out. Pre-planning is essential when  
14 dealing with a fire in a high rise premises, and  
15 operational information gathering and recording should  
16 be carried out in accordance with new policy number 521,  
17 information gathering."

18 It goes on to say:

19 "The tactics and resources required to mount safe  
20 rescue and firefighting operations should be assessed,  
21 practised and confirmed as appropriate for the building  
22 concerned and made available within the operational  
23 information folders."

24 A little bit further on it goes on to say:

25 "Station personnel should familiarise themselves

1 with all high rise buildings on their station's ground.

2 For example, pre-planning should include ..."

3 There's then a list of over ten bullet points, but  
4 just to identify a few: location of information  
5 available on site, rising main inlets, hydrant  
6 locations, clear parking for pumping and aerial  
7 appliances, means of access or egress from the  
8 building -- in other words, how you get in and out of  
9 it --

10 A. Yeah.

11 Q. -- location and function of the fire lifts and lift  
12 machinery, and then floor lay outs and fire-resisting  
13 compartmentation.

14 Then if you go on to page 1152. It's quite a long  
15 set of slides and it by no means only deals with  
16 pre-planning.

17 A. No.

18 Q. So in the interests of completeness there's a slide here  
19 about operational procedure. It gives five topics:  
20 command function, securing the water supply, securing  
21 firefighting lift, establishing a bridgehead and  
22 committing crews.

23 Under "Gathering information", it says:

24 "The incident commander should remain at ground  
25 floor level and start the information-gathering

1 process."

2 Under "Planning", it says:

3 "Fires in high rise buildings are  
4 resource-intensive. The incident commander must quickly  
5 assess the size of the fire and where the fixed  
6 installations are unavailable/malfunctioning. Where  
7 there is a significant fire and/or where there is  
8 a problem with fixed installations, the incident  
9 commander must consider making up the incident to either  
10 implement these procedures or to implement a modified  
11 plan."

12 Just explain to the members of the jury what's meant  
13 by "making up the incident"?

14 A. Calling on more resources. As -- again, in my testimony  
15 I said I made -- I sent a "make pump four" message.  
16 That is making up -- it just means calling on more  
17 resources onto the incident.

18 Q. We see in the list below one of the things that's listed  
19 is additional attendance.

20 A. Yes.

21 Q. So it could be more pumps?

22 A. It could, yes.

23 Q. Then over the page there's a slide about securing  
24 a water supply. Over the page, secure the fire lift,  
25 and then the next one is establishing bridgehead, and



1 that explains why the bridgehead should be located two  
2 floors below the fire floor. About two thirds of the  
3 way down the page:

4 "The bridgehead should be located two floors below  
5 the fire floor unless conditions or pre-planning  
6 arrangements have determined a more appropriate  
7 position. This is based on the following."

8 And then the first item identified is:

9 "Evidence from previous incidents show that the  
10 floor below the fire will often be contaminated by smoke  
11 from the fire floor."

12 So two floors below is standard practice?

13 A. That's correct.

14 Q. Then if you look on page 1158, they identify in the  
15 notes some possible hazards and firefighting  
16 considerations. Under "Hazards", it says:

17 "Fires in high rise buildings present a logistical  
18 and physical challenge to operational personnel which  
19 should not be underestimated. Time taken to have  
20 sufficient resources at the scene of operations has  
21 a direct impact on the rescue of casualties, the  
22 development of the fire and safety of firefighters. The  
23 following difficulties and associated considerations are  
24 not exhaustive."

25 Then you have a list of some but not necessarily all

1 possible hazards?

2 A. Yes.

3 Q. The first is physiological effects. It goes on to say  
4 that what we're talking about here is the risk of heat  
5 stress in high rise incidents is increased due to the  
6 work load and intensity of conditions encountered, which  
7 can lead to exhaustion and collapse of firefighters.

8 A. Yes.

9 Q. Then the next topic is delays in gathering resources:  
10 "Delays in gathering resources to safely mount  
11 operations can increase the likelihood of fire growth  
12 and fire spread occurring."

13 There's then reference to wind effect, which I won't  
14 ask you about, and then external fire spread. What we  
15 see there in the second sentence is:  
16 "This increases the potential spread of the fire  
17 vertically but also potentially horizontally in strong  
18 winds."

19 A. Yes.

20 Q. So the teaching notes say there's an increased risk of  
21 fire spreading vertically, possibly horizontally, but  
22 not downwards; is that correct?

23 A. That's correct, yes.

24 Q. Then over the page it talks about falling objects.  
25 Glass planing. Is glass planing where a whole sheet of

1 glass falls?

2 A. Yes, and acts like a wing on a glider. It can travel  
3 some distance from the building.

4 Q. Rather than falling vertically?

5 A. Rather than falling vertically, yes.

6 Q. And that will be relevant to where you put a cordon?

7 A. Yes, and where you stand and put your resources.

8 THE CORONER: Just to stop you, just going back to  
9 page 1158, "vertically" in that context doesn't say  
10 simply upwards, does it?

11 A. It doesn't, no.

12 THE CORONER: I don't think I need you, Mr Willett, to go  
13 through the reasoning behind that, but I think your  
14 answer indicated that we were looking at an upwards  
15 rise, whereas it doesn't actually say that.

16 A. It doesn't say that, but we had always taken it to mean  
17 upwards. If you look at the picture, the slide that  
18 goes with that text, it does show a vertically upwards  
19 fire spread on the slide.

20 MR MAXWELL-SCOTT: It does. Looking now over the page at  
21 falling objects. Glass planing:  
22 "Debris from the site of a fire presents  
23 a significant hazard. Even small pieces of the building  
24 falling may cause severe injury."  
25 So taking a fair assessment of what this is telling

1 the trainer, it's talking here about a risk of items  
2 falling and landing on people?

3 A. That's correct.

4 Q. But it's not talking about a risk of items falling and  
5 starting new fires?

6 A. That's how I understand it.

7 Q. Then at the bottom of that page, "Evacuation of  
8 buildings":

9 "Firefighting operations can be affected by the type  
10 of evacuation being undertaken, the progress of the  
11 evacuation and the number and type of people being  
12 evacuated."

13 Then "Considerations" under this topic. The second  
14 sentence says:

15 "If more than one protected stairwell, consider  
16 having an attack stairwell and an evacuation stairwell."

17 So in other words, if you have two staircases in  
18 a building, unlike at Lakanal where there was only one,  
19 you could use one to send firefighters up to attack the  
20 fire, and you could use the other to evacuate residents;  
21 is that right?

22 A. That's correct, yes.

23 Q. It goes on to say:

24 "In domestic flats, the building design will not  
25 normally require mass evacuation, but the incident

1 commander must consider safety of occupants adjacent to  
2 fire."

3 A. Yes.

4 Q. Would that mean in flats adjacent to the flat in which  
5 the fire is?

6 A. It could mean flats adjacent, and if buildings are built  
7 close together, it could mean buildings adjacent.

8 Q. Then over the page, there's another consideration  
9 identified, which is building design and fire safety  
10 measures. It says:

11 "The risks posed by the premises and its contents  
12 when involved in fire can significantly increase should  
13 any of the measures designed into the building be  
14 compromised. This can include the loss of  
15 compartmentation."

16 Just explain what you understand by that?

17 A. Compartmentation, essentially dividing up a flat into  
18 compartments. Obviously the way that would be presented  
19 is as the rooms. Each room should be able to contain  
20 the fire. The compartmentation should be in such a way  
21 as the fire should be contained within that one  
22 compartment or room.

23 Q. So if it spreads outside the room it starts in, then  
24 that's the sort of issue which this paragraph is dealing  
25 with?

1 A. Yes. I mean, obviously all rooms have doors, so there's  
2 always the risk, but the actual structure of, like, the  
3 floors, wall and ceiling, yeah, that's what it's talking  
4 about by the compartmentation, as I understand it.

5 Q. To be more precise, it's talking about where a fire as  
6 in some way got out of a room where all the doors and  
7 windows were shut?

8 A. Yes.

9 Q. Then there's reference, under "Possible considerations",  
10 to "complex layout and design". The line below; do you  
11 see that?

12 A. Sorry, I'm just looking where we were. Is this under  
13 "Considerations"?

14 Q. We just saw:  
15 "This can include the loss of compartmentation."

16 A. Sorry, I lost the paragraph.

17 Q. I apologise. "Building design and fire safety  
18 measures"?

19 A. Yes.

20 Q. In the fourth line, there's reference to "complex layout  
21 and design" of many high rise buildings?

22 A. Yes.

23 Q. And then, in "Considerations", it says:  
24 "The incident commander should gather information on  
25 the building layout."

1                   "?"

2    A.   Yes.

3    Q.   Then the next consideration identified is smoke travel.

4    A.   Yes.

5    Q.   Then if you turn on to page 1163, essentially now we

6           have reached the end of the slide show and this is

7           a slide that remains people of what the objectives of

8           the training were which had been set out at the

9           beginning.

10   A.   That's correct.

11   Q.   At the next page there's reference to the policy, 633,

12           that deals with firefighting in high rise buildings,

13           yes?

14   A.   Yes, sorry, that's correct.

15   Q.   And then on page 1165, there's a slide that says

16           "Evaluation". Can you just explain what this is? I'm

17           assuming it's some kind of test, for want of a better

18           word, of the people who have attended the training?

19   A.   Yes, it is essentially a questions and answers test.

20   Q.   So the questions themselves are on the next two slides,

21           questions 1 to 10?

22   A.   That's correct.

23   Q.   The first question is:

24           "Identify six areas that should be included in

25           pre-planning for a high rise incident."

1 A. Yes.

2 Q. That would be, in effect, testing the sort of things we  
3 saw on the pre-planning slides?

4 A. Yes, presumably.

5 Q. As the person giving that training, would you mark it?

6 A. Yes.

7 Q. How would that be done?

8 A. I mean, I don't recall whether we went, on this one --  
9 on some packages it's delivered as an individual test,  
10 other packages would go through as a general test of the  
11 watch's knowledge, depending on the subject matter.  
12 I can't recall whether we did this one as a printed-off  
13 questionnaire or whether it was done just on the  
14 PowerPoint.

15 Q. If you look at page 1169, it talks about recording of  
16 training?

17 A. Yes.

18 Q. "Now that this package has been delivered to personnel,  
19 the results must be recorded in the step system."

20 A. Yes.

21 Q. Can you help us with what sort of information will be  
22 recorded?

23 A. It will essentially record who was on duty, the training  
24 that was delivered, who delivered the training and what  
25 the outcome was, and it's like a red, amber or green



1 recording facility.

2 Q. And red, amber and green, is that essentially trying to  
3 get to the question of whether people seem to have  
4 absorbed --

5 A. Yes.

6 Q. -- and understood the training?

7 A. Yes.

8 Q. Or whether, because of the marks that were achieved in  
9 the evaluation, they might need more training?

10 A. Yes.

11 Q. Just now moving on in the chronology, we're going to go  
12 to April 2009, page 1172. This is an email which should  
13 be put in the jury bundle behind the previous documents  
14 at tab 15. (Handed) Just to recap for everyone's  
15 benefit in open court, the jury bundle should now have,  
16 at tab 15, pages 1127 to 1130 and 1137 to 1170. We're  
17 now adding 1172.

18 THE CORONER: Thank you.

19 MR MAXWELL-SCOTT: So just take a moment to have a look at  
20 this, Mr Willett. It's an email, 20 April 2009, to all  
21 station managers and all borough commanders from  
22 an assistant commissioner. So that wouldn't include you  
23 on that circulation list, on the face of it?

24 A. No.

25 Q. Because you weren't a station manager?

1 A. No, that's correct.

2 Q. Just take a moment to assist the court with whether you,  
3 in fact, have ever seen that email before?

4 A. I can't recall.

5 Q. Just looking at the content anyway, because you may be  
6 able to help us:

7 "High rise buildings. As you are aware, an article  
8 dealing with high rise incidents was published in  
9 Operational News 10 in November 2008 ..."

10 That's the article we've been looking at?

11 A. It is, correct, yes.

12 Q. "... which also included the updated high rise  
13 firefighting policy. This was a mandatory piece of  
14 training for all operational staff which should now have  
15 been completed and entered into the station diary on  
16 step."

17 Then it talks about 72D visits, familiarisation  
18 visits, pretty much the same thing.

19 A. Yes.

20 Q. And it says in the third line:

21 "As part of the ongoing familiarisation training for  
22 station-based staff, station managers are to ensure that  
23 watch and crew managers diaries, book and visit the high  
24 rise buildings on their station ground during 2009/10.  
25 This process should begin with immediate effect and then

1 be undertaken annually thereafter."

2 At the next paragraph it says:

3 "Where watch and crew managers identify a high rise  
4 building that falls outside the criteria but, through  
5 risk assessment, deem that it would be beneficial for  
6 crews to familiarise themselves, then these visits  
7 should be carried out also."

8 Just pausing there, Lakanal would fit the criteria  
9 in any event, wouldn't it, because it had a firefighting  
10 lift and a dry rising main?

11 A. Sorry, I can't see the criteria that it refers to.

12 Q. That's my fault because I skipped over it, but I think  
13 it was the first sentence under 72D.

14 A. Yes.

15 Q. Then going on from where we were:

16 "In addition to the above mentioned visit, each  
17 watch should arrange and complete a training exercise --  
18 minimum of two pumping appliances -- to test the on  
19 arrival tactics at a high rise premises of their choice.  
20 This exercise should be completed by 31 July. Please  
21 note that apart from this training exercise equipment is  
22 not to be tested on these visits. These are purely 72D  
23 visits for familiarisation of access, egress, fixed  
24 installation, water supplies, occupancy and firefighting  
25 tactics, building construction hazards, et cetera."

1 A. Yes.

2 Q. So that's towards the end of April 2009.

3 A. That's correct.

4 Q. If you just look on in your bundle to page 1178?

5 A. Yes.

6 Q. This is an email that summarises what has been found out  
7 about familiarisation visits to Lakanal House after, for  
8 our purposes, that email in April 2009. What we see  
9 there is that the white watch carried out  
10 a familiarisation visit on 2 May?

11 A. Yes.

12 Q. And that the blue watch did the same on 30 May?

13 A. Yes.

14 Q. And of course you were on the green watch?

15 A. I was, yes.

16 Q. So you weren't part of either of those visits?

17 A. No.

18 Q. Did you know that those visits had taken place?

19 A. I don't recall. I don't recall if I knew at that point  
20 whether they had taken place who are not.

21 Q. Does it follow from that that you don't recall any  
22 discussion about anything that was noted or found out on  
23 either of those visits?

24 A. That's correct. I don't recall any discussion about it.

25 Q. Do you think if there had been any such discussion you

1           would remember it, that it would stick in your mind?

2    A.   I couldn't say.  We discussed -- there was always  
3           discussion about various new buildings being built, road  
4           closures.  I couldn't say if this one would stand out.  
5           Unless it was something that was vastly out of the  
6           ordinary, it probably wouldn't stand out any more than  
7           a discussion about other buildings, road closures, that  
8           we discussed with other watches.

9    Q.   Are you able to assist with whether there was any plan  
10           for green watch to carry out a similar familiarisational  
11           visit at Lakanal House that was intended to take place  
12           but hadn't done so by the time of the fire?

13   A.   I don't recall us having a plan to visit there in --  
14           when we planned the diary, we only saw -- we work on  
15           a three-month basis and it's a rolling, so after one  
16           month, the next month goes in.  At the time I don't  
17           recall there being a visit planned in there for that  
18           period of time, but I don't recall everything in three  
19           months' worth of diary entries.

20   Q.   If there was something from the visit carried out by the  
21           other watches, white and blue, in May 2009 which was  
22           thought desirable for all watches to know about, what  
23           would be the method of making sure that everybody knew  
24           it?

25   A.   As I mentioned earlier, there's a handing over book.  It

1 would also -- if it was a serious fault or a serious  
2 reason for it, it may also have been brought to the  
3 attention of the station manager who would have then  
4 made sure that the information got disseminated to the  
5 other watch managers or other watch officers.

6 Q. If you turn back now to page 1173.

7 A. Yes.

8 Q. So you'll recognise this as another edition of  
9 Operational News, May 2009.

10 A. Yes.

11 Q. By all means take a moment to look at it, but on the  
12 basis of your previous answers, is it fair for us to  
13 assume that you would have read this as well?

14 A. That's correct, yes.

15 Q. The story in the article on the first page here is on  
16 arrival planning and tactics?

17 A. Yes.

18 Q. It says this:

19 "The success model developed within the 2007  
20 operational professionalism 'Focusing on the Basics'  
21 training package relies on a solid foundation made up of  
22 many elements. These include pre-planning achieved by  
23 carrying out visits under section 72D and training to  
24 maintain core skills. Observations from ORT  
25 officers..."

1           Can you help us with what that means?

2   A.   Operational review team.

3   Q.   Thank you:

4           "... and comments recorded on the IMP database ..."

5           Can you help us with that?

6   A.   I believe it's incident management, but I'm not sure on

7        the "P".

8   Q.   I'll just go on, finish the sentence and then I'll come

9        back:

10          "... clearly indicate that where accurate

11         information has been recorded through pre-planning

12         activities and which is available to staff at the early

13         stages of an incident, the likelihood of a successful

14         and effective outcome to an incident is greatly

15         enhanced."

16          So is that in effect saying that analysis after the

17         event of incidents has established that where accurate

18         information has been recorded through pre-planning

19         before the incident, the likelihood of the incident

20         going well is greatly increased?

21   A.   That's correct, yes.

22   Q.   Then it says:

23          "It is therefore essential that pre-planning

24         activities are given a high priority."

25          Then there's reference to the mobile data terminals

1           which you've already said hadn't been installed  
2           by July 2009?

3    A.   That's correct, yes.

4    Q.   This article in the second column in effect says as  
5           much.  It was going to start in July 2009 and complete  
6           in February 2010.  Then we see in the second column:

7                   "During the installation period, station-based staff  
8                   are expected to continue to maintain and utilise  
9                   information held in the operational information folder,  
10                   72D information and CRR records."

11                   Can you help us with what CRR records are?

12   A.   Central risk register.

13   Q.   By "central", how central are we talking about?

14   A.   The information held at control for risks such as  
15           premises that might contain as acetylene cylinders,  
16           flammable chemicals, corrosive chemicals.

17   Q.   Then it says:

18                   "The type of information recorded will depend on the  
19                   premises involved but must always include accurate  
20                   building and site plans and clearly indicate water  
21                   supplies and fixed installations for use by fire service  
22                   personnel in the event of fire or other emergencies."

23                   Now we looked at what the equivalent to 72D visits  
24                   produced by way of a standard document back in 2002 and  
25                   2004.



1 A. Yes.

2 Q. Where the focus was very much on the dry rising main and  
3 the firefighting lift?

4 A. Yes.

5 Q. And anything else?

6 A. Yes.

7 Q. What I wanted to ask you was whether, in this period  
8 we've been talking about, starting back  
9 in September 2008, then there was November 2008, and now  
10 we've got this issue of Operational News in May 2009 --  
11 whether there was discussion about a change in approach  
12 in how these familiarisation visits are done and the  
13 level of information that's recorded.

14 A. No, I don't recall a specific change in direction on the  
15 information gathered or how we gathered it.

16 Q. Madam, I notice that it's 3.45. We've only had one five  
17 minute break since 1.30. I will need another perhaps 15  
18 minutes to complete all of my questions and I'm in your  
19 hands and will be guided by you as whether you want to  
20 take a short break or finish for the day or you'd like  
21 me to continue. It's obvious that Willett is going to  
22 need to come back tomorrow and he was warned for over  
23 today and tomorrow.

24 THE CORONER: Yes, very well. Can I just ask the  
25 transcribers: are you okay to go on for a short while or

1 would you like a break? Yes.

2 Members of the jury, are you okay to go on until  
3 4 o'clock? I see nods all round. Thank you very much.  
4 What I suggest is if we try and complete your questions  
5 to Mr Willett this afternoon and then others can have  
6 the opportunity to put questions to him tomorrow.  
7 Mr Willett, are you going to be able to come back  
8 tomorrow?

9 A. I am, yes.

10 THE CORONER: Good, thank you very much.

11 MR MAXWELL-SCOTT: We covered the point that your watch  
12 hadn't carried out a familiarisation visit at Lakanal  
13 after this email in April 2009 --

14 A. That's correct.

15 Q. -- before the fire and two other watches had done.

16 A. Yes.

17 Q. But if you look at page 1183, you'll see, as  
18 I understand it, that your watch had carried out the  
19 high rise procedure on arrival tactics training that the  
20 email was talking about. Take a moment to look at that.

21 A. Okay. Yeah, I can see -- is that the fourth entry down,  
22 you're looking at? Strategic resource? It says:

23 "Core skills training. High rise procedure on  
24 arrival tactics."

25 Q. Is that the exercise that was expected to be carried out

1 by 31 July according to the email?

2 A. There's not enough detail there for me to say for sure.

3 Q. If you could be shown page 1552 in the advocates'

4 bundles. That will be the fourth one. (Handed) This

5 is London Fire Brigade policy number --

6 THE CORONER: Mr Willett does not have it yet. Can you give

7 me the number again, please?

8 MR MAXWELL-SCOTT: 1552.

9 A. Okay.

10 MR MAXWELL-SCOTT: Policy number 521, information gathering.

11 A. Yes.

12 Q. This links back, or is at least referred to, in the

13 feature on arrival planning and tactics that we saw in

14 the May 2009 newsletter?

15 A. Yes.

16 Q. Obviously you're a crew manager so I don't know whether

17 this is the sort of document that you would ordinarily

18 read or whether you would see things in a different

19 format.

20 A. I have access to this form. They're all held on the

21 brigade's intranet site, so I can access it. They

22 are -- they're there for reference, should I need to

23 reference them.

24 Q. Just in order to provide a more complete picture about

25 pre-planning, if one looks at page 1554, section

1 number 7, which is called "The hazards".

2 A. Yes.

3 Q. What it says is:

4 "It is important, when identifying the premises to  
5 carry out information-gathering visits, that points  
6 listed below are considered. This information will form  
7 the basis for completion of the A010."

8 Am I right in thinking that that is a form that one  
9 puts in the operational information folder?

10 A. It may be. I am not familiar with that particular  
11 form -- title as it is there. The form number.

12 Q. I'll just read out what it says. It's giving guidance  
13 about what sort of premises might require points being  
14 recorded, because it says:

15 "This information will form the basis for completion  
16 of this document."

17 The A010. Just for the benefit of the court it  
18 says:

19 "These points are not exhaustive and the  
20 professional judgment of all personnel will add to it.  
21 Premises or sites which are obvious from their  
22 appearance as to the type of trade/business/process  
23 carried out, eg motor vehicle repair work shops, may not  
24 need such a detailed information gathering process as  
25 premises which from the exterior give no indication as

1 to the type of trade/business/process carried out."

2 So in other words you need to be more focused if  
3 you're dealing with premises where you don't know what  
4 is done there?

5 A. That's correct.

6 Q. Then it says:

7 "Certain premises, eg large hospitals, industrial  
8 complexes and sports stadia, due to their size and  
9 complexity, may offer large and varied hazards  
10 associated with their use. Firefighters may never gain  
11 a detailed knowledge of the layout, even after many  
12 visits."

13 So there's a focus there on certain types of  
14 premises like large hospitals, industrial complexes and  
15 sports stadia. No specific reference to high rise  
16 apartment blocks?

17 A. That's correct.

18 Q. Then it says:

19 "The physical size of the building should not be the  
20 only criteria upon which to base a visit."

21 The next point is that:

22 "The building itself may be the hazard. The method  
23 of construction and materials used could pose a risk to  
24 the firefighters once involved in a developing fire."

25 Farm buildings are given as an example. Over the

1 page, 7.9:

2 "It is particularly relevant when considering  
3 premises containing hazardous processes or storage that  
4 watch managers are aware of the out of hours emergency  
5 contact arrangements."

6 A. Yes.

7 Q. So there's a focus there on hazardous materials being  
8 inside a building.

9 A. That's correct, yes.

10 Q. Then the next paragraph:

11 "Where dangerous substances are present, the  
12 owner/occupier/responsible person is required to provide  
13 the information on the nature of the hazards so that the  
14 brigade can pre-plan."

15 Again, that's about there being dangerous things.  
16 There could be chemicals, for example, on a site.

17 A. That's correct, yes.

18 Q. It goes on to say that:

19 "Premises considered to have a higher risk should be  
20 visited on a more regular basis."

21 A. Yes.

22 Q. So for completeness, there's no specific reference there  
23 to high rise blocks of flats?

24 A. That's correct, yes.

25 Q. Just finally on this topic, to round it off, I'm not

1           sure if you're aware of this or not, but the operational  
2           information folder that was on your appliance at the  
3           time of the fire didn't have any specific information  
4           about Lakanal House and it didn't have any information  
5           about any high rise tower blocks in your geographical  
6           area?

7    A.   Correct.

8    Q.   Is that something you would have known at the time or  
9           guessed at the time?

10   A.   I'm reasonably sure that I was aware of that.

11   Q.   Finally I just want to come back to one issue about your  
12           own involvement when you were the incident commander.

13   A.   Yes.

14   Q.   Did you, at the time, consider the possibility that  
15           burning debris might start a fire or fires on lower  
16           floors?

17   A.   No, I didn't.

18   Q.   You would have been aware of the pigeon spikes and the  
19           netting, either because you saw it or because it's not  
20           unusual?

21   A.   Yes.

22   Q.   Would it have gone through your mind that there was any  
23           possibility of falling debris that was on fire catching  
24           and igniting on the lower floors?

25   A.   It wasn't something I thought about at the time. I had

1 quite a lot to think about. That didn't crop up into my  
2 thought process at the time.

3 Q. When you arrive, you arrive and it's a high rise block  
4 of flats?

5 A. Yes.

6 Q. But of course, the fire could be on any floor. It might  
7 be on the second floor or it might be on the top floor.

8 A. Yes.

9 Q. Do you have, as part of your thought processes at the  
10 time, the fact that more resources might be required to  
11 put it out if it's on a higher floor?

12 A. Not additional resources on a higher floor. It really  
13 won't make that much difference. If we were turning up  
14 and the lift had not been working and it had been on  
15 a higher floor then that could have been more  
16 resource-intensive because he would have had to take all  
17 the equipment up the stairs, and obviously personnel  
18 would tire and there would be a slowing down in the  
19 process. As it occurred to me, no, I didn't think that  
20 it would make any difference to the amount of resources  
21 required.

22 Q. I'm conscious that we've seen reference to risks of heat  
23 stress and the intense physical effort that might be  
24 involved in fighting the fire.

25 A. Yes.



1 Q. I was just wondering whether you thought that might be  
2 different if it was on a higher floor, and you think  
3 not?

4 A. No, I don't think so.

5 Q. Can you assist the court with your thought processes  
6 when you made pumps four, and in particular whether you  
7 gave consideration to ask for more pumps than that,  
8 "make pumps six" or "make pumps eight".

9 A. We, as a watch, had attended similar high rise fires  
10 that we had contained and were successfully extinguished  
11 as four-pump fires. When we arrived, it appeared to be  
12 a fire confined to a single compartment, so based on  
13 what was evident when we got there, it seemed  
14 a reasonable place to start.

15 Q. Just to help us to understand the process, there's  
16 nothing to stop you immediately saying, "Make pumps  
17 eight"?

18 A. There's nothing to stop me making it anything I want.

19 Q. It doesn't have to go up in sequences of either one or  
20 two?

21 A. No.

22 Q. Is it right that a couple of weeks or so after the fire,  
23 you and other incident commanders attended what I  
24 imagine was effectively a debrief called a PRO or PRC?

25 A. PRC.

1 Q. Thank you. Could you be shown the notes from that,  
2 which start at page 1324.

3 THE CORONER: Before we do, Mr Maxwell-Scott, I'm conscious  
4 that it is now 4 o'clock. Is this something which would  
5 be better continued in the morning if it's going to take  
6 a little while to go through?

7 MR MAXWELL-SCOTT: I think it will be no more than five  
8 minutes before the end of my questions.

9 THE CORONER: All right. What page number?

10 MR MAXWELL-SCOTT: 1324. (Handed)

11 A. I have that page.

12 Q. Thank you. Firstly, is that something you'll have seen  
13 before?

14 A. No, it's not.

15 Q. Your name's there. We know you were present.

16 A. That's correct, yes.

17 Q. About three quarters of way down the page, it says  
18 "IC1". That's you, the first incident commander?

19 A. Yes.

20 Q. Then there are notes of what you said. If you turn on  
21 to page 1327.

22 A. Yes.

23 Q. In the middle of the page there's a horizontal line  
24 across the page.

25 A. Yes.

1 Q. Then there's the shorthand "CH", which I'm assuming is  
2 chairman?

3 A. Not my notes. Couldn't say.

4 Q. No, I appreciate that. Then it says this:  
5 "GP: Recognition of need to establish high rise and  
6 not getting sucked in to going inside building. GP:  
7 Staying outside in visible command point (focal point)."  
8 I'm going to suggest to you that that might be the  
9 chair identifying good points about your activities as  
10 incident commander?

11 A. Possibly.

12 Q. Does that jog your memory at all?

13 A. Nothing was said at the time of the PRC, but I have  
14 since been given a printout of the feedback for the IMP  
15 in which, yes, those points were raised as positive  
16 points.

17 Q. Then it says this:  
18 "LP: Recognition of HR [presumably high rise]  
19 procedures being resource-intensive with only four apps  
20 in initial make-up. Need to consider additional  
21 support, plan to meet objectives, resource to meet  
22 plan."  
23 I'm guessing -- and comment if you will -- but "LP"  
24 is talking about there a learning point?

25 A. Possibly, but as I say, it's not my notes. On the email

1 I was given, the fact that -- "make pumps four" was also  
2 given as positive feedback.

3 Q. Then in brackets underneath it says:

4 "Agreed. Should have made six PF not four PF."

5 A. Yes.

6 Q. What I'm asking you is: do you have any recollection of  
7 any discussion where it was suggested to you at this  
8 meeting that you should have made six pumps and you  
9 agreed?

10 A. No. I may have agreed with hindsight but I don't recall  
11 them suggesting that I should have made pump six on the  
12 day. It was more of a hindsight -- a reflection in  
13 hindsight.

14 Q. My final question is: can you assist the court with what  
15 single additional thing you think would have helped you  
16 most on the day of the fire to tackle the fire? So it  
17 could be an additional item of knowledge or training or  
18 additional resources, whether it be more firefighters or  
19 different equipment?

20 A. No, I couldn't. It was as -- I felt that, operationally  
21 and procedurally, everything was going according to plan  
22 until the fire spread downwards, sandwiching the  
23 bridgehead, which caused the bridgehead to be evacuated  
24 and shut down. That was outside our control. No  
25 equipment or resources would have changed that.

1 Q. Any piece of additional information that you think might  
2 have assisted in the efforts?

3 A. No. You can only look back with hindsight and say,  
4 "This would have been great, that would have been  
5 great", but as it goes, if I had to attend a similar  
6 incident tomorrow, no additional information that was  
7 there would have made any difference, in my opinion --  
8 I have to stress it is only my opinion -- as to how  
9 things went. It was basically the vertical downward  
10 fire spread that caused any problems that we -- we  
11 encountered.

12 Q. Thank you very much. Those are my questions.

13 THE CORONER: Thank you very much.

14 Mr Willett, thank you very much. We do ask you to  
15 come back tomorrow. We'll continue at 10 o'clock, so  
16 please be here in good time to start at 10 o'clock.

17 A. Yes, madam.

18 THE CORONER: And please remember that you must not talk  
19 about your evidence to anyone at all, whether  
20 colleagues, friends, or anybody, as you're part way  
21 through giving your evidence. Thank you very much.

22 Members of the jury, I'm sorry we've kept you  
23 a little late tonight, but thank you very much for your  
24 patience. You're welcome to go now. Please be back in  
25 good time for a start at 10 o'clock tomorrow morning.



1 I think we should have her tomorrow. We will need about  
2 15 minutes to 20 minutes perhaps at the end of the day  
3 to give the jury a briefing about the site visit the  
4 next day. There are, I think, four other witnesses who  
5 are potentially lined up to come tomorrow, but I don't  
6 think it's realistic to complete all of them by any  
7 means. It may be that we won't get to any of them, it's  
8 hard to say. Obviously Mr Willett was the first  
9 firefighter and he was the first incident commander, so  
10 he was always going to take quite a lot of time to lay  
11 some groundwork and establish some introductory matters.  
12 I would have thought Mr Badger would be a good deal  
13 quicker, but it's difficult to be accurate.

14 THE CORONER: Yes, I don't want to ask people to come and  
15 then send them away, because that's irritating for them.

16 MR MAXWELL-SCOTT: There are some statements that could be  
17 read under rule 37 if time went quicker than expected,  
18 but it may be it is more realistic to ask maybe just one  
19 of those four residents to attend in addition to Yolimar  
20 Caboz.

21 THE CORONER: That sounds sensible. Does anyone have any  
22 observations to assist with that? If so, let's identify  
23 the further person to be invited, then everyone else  
24 will know in respect of whom they need to prepare.

25 MR MAXWELL-SCOTT: I think Mr Udi.

1 MR CLARK: Madam, Mr Udi was, I believe, very, very late and  
2 will have made arrangements to be here tomorrow.  
3 I suggest that he remain.

4 THE CORONER: That sounds fine. In that case, let's ask  
5 Mr Udi if he's lined you up and ready to come, and we'll  
6 be able to warn the others that we're not going to need  
7 them tomorrow.

8 All right, so it's Mr Willett to be finished,  
9 Mr Badger, Miss Caboz and Mr Udi tomorrow then, and  
10 a briefing for jurors for the visit on Friday. All  
11 right.

12 Is there any point anybody needs to raise before we  
13 finish this evening?

14 MR MAXWELL-SCOTT: Madam, it was always intended that after  
15 Jade Spence's evidence we would briefly review the  
16 position that was communicated before the inquest  
17 started about the issue of the initial origin of the  
18 fire, and I think for completeness we ought to do that.

19 THE CORONER: Yes.

20 MR MAXWELL-SCOTT: From my point of view, the evidence we've  
21 heard today was consistent with what we anticipated and  
22 therefore the original plan, which involved some  
23 witnesses not needing to be called, should remain in  
24 force.

25 THE CORONER: Does anyone have any dissenting voice on that?



1 Fine. Well, no-one is suggesting that they disagree,  
2 and I'm comfortable with that position, so I think  
3 that's fine. All right, thank you very much. Does  
4 anyone suggest anything should be redacted from the  
5 transcript to go onto the website? No. I can't think  
6 of anything that should be. All right. Well, provided  
7 there are no corrections or any corrections are dealt  
8 with by first thing tomorrow morning, in accordance with  
9 the protocol I sent around this morning, then that can  
10 be posted tomorrow. All right.

11 Well, in that case a prompt start at 10 o'clock  
12 tomorrow. Thank you very much everybody.

13 (4.11 pm)

14 (The Court adjourned until 10 o'clock the following day)

15 Housekeeping .....1  
16 JADE SPENCE (affirmed) .....5  
17 Questions by MR MAXWELL-SCOTT .....6  
18 DR PETER MANSI (recalled) .....23  
19 Questions by MR MAXWELL-SCOTT .....24  
20 Questions by MR HENDY .....31  
21 BARRY WILLETT (affirmed) .....35  
22 Questions by MR MAXWELL-SCOTT .....36  
23  
24  
25

