

# OPUS 2

## INTERNATIONAL

Grenfell Tower Inquiry

Day 6

March 2, 2020

Opus 2 International - Official Court Reporters

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1 Monday, 2 March 2020  
2 (10.00 am)  
3 SIR MARTIN MOORE-BICK: Good morning, everyone. Welcome to  
4 today’s hearing, at which we’re going to start hearing  
5 evidence from the architects .  
6 Before we do that, there are two things that I think  
7 I need just to mention briefly .  
8 The first concerns the reason for the delay we have  
9 had in getting to this point of starting the evidence.  
10 As I think probably all of you, or certainly most of  
11 you, will know, the Attorney General has decided to give  
12 an undertaking that nothing said in answer to questions  
13 put to an individual who is called to give evidence  
14 before the Inquiry will be used for the purposes of  
15 deciding whether to pursue a prosecution or, indeed, in  
16 support of a prosecution of that individual .  
17 The effect of that undertaking is simply to give  
18 every individual who is called to give evidence the same  
19 degree of protection against self-incrimination as is  
20 available under the general law in the form of the  
21 privilege against self-incrimination. As a result ,  
22 no one will be able to justify refusing to answer  
23 questions on the grounds that to do so would or might  
24 expose him or herself personally to a risk of  
25 prosecution.

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1 The undertaking does not apply to companies or other  
2 corporate bodies, which will therefore remain entitled  
3 to rely on the privilege against self-incrimination if  
4 they give evidence in their own right.

5 The other matter just to mention briefly is a very  
6 hot topic: coronavirus. We are all very well aware of  
7 the outbreak of coronavirus and the fact that  
8 an increasing number of cases have been reported in this  
9 country. The number may rise and, although it’s  
10 important not to panic, we must all take reasonable  
11 precautions to avoid spreading infection .

12 Please, therefore, make use of the hand sanitisers ,  
13 when they become available, when you enter the building,  
14 and avoid attending the hearings if you feel at all  
15 unwell. You can of course follow the hearings on the  
16 live stream, and it’s much better to do that than to  
17 risk spreading infection if you have any doubt about  
18 your state of health.

19 So, with those matters out of the way, I’m going to  
20 invite Mr Millett to call the first witness.

21 MR MILLETT: Thank you, Mr Chairman.

22 Mr Chairman, I now call our first witness to  
23 Module 1 of Phase 2, Mr Andrzej Kuszell.

24 SIR MARTIN MOORE-BICK: Yes, thank you.  
25

2

1 MR ANDRZEJ KUSZELL (sworn)  
2 SIR MARTIN MOORE-BICK: Thank you very much, Mr Kuszell.  
3 Now, would you prefer to sit down?  
4 THE WITNESS: Actually, one thing, I have forgotten my  
5 glasses .  
6 SIR MARTIN MOORE-BICK: You had better get them. Yes,  
7 definitely .  
8 (Pause)  
9 THE WITNESS: I apologise.  
10 SIR MARTIN MOORE-BICK: No, it’s quite all right, don’t  
11 worry. Just take a moment to get yourself settled .  
12 Yes, do sit down.  
13 All right?  
14 THE WITNESS: Yep.  
15 SIR MARTIN MOORE-BICK: Good, thank you very much.  
16 Yes, Mr Millett .  
17 Questions by COUNSEL TO THE INQUIRY  
18 MR MILLETT: Mr Kuszell, can you please give the Inquiry  
19 your full name.  
20 A. It’s Andrzej Jozef Maria Kuszell .  
21 Q. Thank you very much, first of all, for coming to  
22 the Inquiry to give evidence today and for assisting us  
23 with our investigations . I’m going to be asking you  
24 questions today. If you have difficulty understanding  
25 anything I’m asking you, then please just ask me to

3

1 repeat the question and I’ll put the question either  
2 again or in a different way so that you can understand  
3 it .

4 Could you also just keep your voice up so that the  
5 transcribers can hear it and so that everybody in the  
6 room here can also hear it .

7 A. Yeah.

8 Q. You have made a witness statement for the Inquiry. It’s  
9 in a folder on your desk in front of you and it will  
10 also appear on the screen. Can I take you to it. It’s  
11 at {SEA00014271}.

12 A. Yeah.

13 Q. It’s dated 9 November 2018. Just looking at the first  
14 page there in front of you, Mr Kuszell, is that your  
15 first witness statement?

16 A. Correct.

17 Q. Can I please ask you to turn to page 21. You will be  
18 taken to that on the screen. There is a signature there  
19 above the date of 9 November 2018. Is that your  
20 signature?

21 A. It is .

22 Q. You have also provided, I believe, an exhibit: AJK1. If  
23 we can please have that up on the screen. That is  
24 {SEA00014272}.

25 A. Yes.

4

1 Q. There is also an index to the documents that you have  
 2 referred to in your statement, which is {IDX0172}, if we  
 3 could please have that on the screen.  
 4 A. Yes.  
 5 Q. That is a document which runs over a number of pages.  
 6 Just confirm with me, please, that these are, just  
 7 looking at it, all the documents that you referred to in  
 8 your witness statement?  
 9 A. I believe that's correct.  
 10 Q. Okay, and if you need to see the rest of it, we can look  
 11 at it, but it runs along in a similar way.  
 12 Have you read your witness statement that I've just  
 13 shown you recently?  
 14 A. Yes.  
 15 Q. Can you confirm or are you able to confirm that the  
 16 contents are true?  
 17 A. I can confirm that, as far as I can recollect, the  
 18 contents are true.  
 19 Q. Thank you.  
 20 Now, you also provided a witness statement to  
 21 the Metropolitan Police in 2017. Do you remember that?  
 22 A. Yes, I do.  
 23 Q. That is at {MET00019989}. If we could please have that  
 24 up on the screen.  
 25 A. Yes.

1 Q. If you look on the screen there, you can see near the  
 2 bottom of the screen it's dated 15 December 2017.  
 3 A. Yes.  
 4 Q. Have you read that statement recently?  
 5 A. Not as recently as my witness statement to the Inquiry,  
 6 but yes, I have read it in the last few weeks, yes.  
 7 Q. Thank you. Can you confirm that the contents of that  
 8 statement are true?  
 9 A. Yeah, as far as possible. That statement was done very  
 10 close to the event, the tragic event, and that was  
 11 a much broader statement than my direct involvement. So  
 12 it was produced based on information that I actually  
 13 gleaned way after the event, speaking to colleagues and  
 14 looking at various documents, because the police at the  
 15 time were interested in the overall rather than just my  
 16 specific narrow involvement.  
 17 Q. Right.  
 18 A final general question: have you discussed with  
 19 anybody the evidence that you are going to give today in  
 20 any way?  
 21 A. Prior to preparing it, it was my personal witness  
 22 statement which was prepared with the lawyers. Once it  
 23 was submitted, then yes, I discussed it with colleagues.  
 24 Q. How recently have you discussed that with colleagues?  
 25 A. Gosh, that's a difficult question to answer, because, as

1 you can imagine, preparing to attend the Inquiry and  
 2 reading the various documentation that has been passed  
 3 from the Inquiry, which we can -- well, we can't really  
 4 even keep up with it. So I think -- I certainly didn't  
 5 sit down with my colleagues to go through my witness  
 6 statement and study it sort of page by page, but there  
 7 may have been references by them to their witness  
 8 statements and me to mine. In that sense, we would have  
 9 spoken to each other, yes.  
 10 Q. When you say colleagues, who are you referring to?  
 11 A. Primarily Bruce and Neil, who have continued to work  
 12 with me.  
 13 Q. Right. Bruce Sounes and Neil Crawford; yes?  
 14 A. Correct.  
 15 Q. Yes.  
 16 Now, at the outset, you have said in your statement  
 17 that you didn't have day-to-day involvement with the  
 18 Grenfell Tower project. That's what you have said in  
 19 your statement. That's correct, is it?  
 20 A. Correct, yes.  
 21 Q. In the light of that, I'm not going to ask you any  
 22 questions about the detail of the project or any  
 23 technical matters overall; I'm going to look at more  
 24 general matters, including, I should say, the initial  
 25 brief for the Grenfell project, the selection of the

1 team, payment issues, and other matters of that nature.  
 2 Also, Mr Kuszell, just so that you're clear, when  
 3 I refer to Studio E, I mean Studio E LLP, but also SEAL,  
 4 from 2014 only. Am I clear about what I mean?  
 5 A. I am clear what you mean. Studio E Architects --  
 6 (Disruption from the floor)  
 7 SIR MARTIN MOORE-BICK: We are going to rise for two minutes  
 8 and those gentlemen will be asked to leave the hearing  
 9 and not return.  
 10 (10.10 am)  
 11 (A short break)  
 12 (10.18 am)  
 13 SIR MARTIN MOORE-BICK: Well, I'm sorry about that  
 14 interruption. I was slightly surprised, because during  
 15 the Phase 1 hearings I was very impressed by the way in  
 16 which everyone listened to the witnesses in a respectful  
 17 and dignified way, and I hope that, now we have got that  
 18 little outburst out of the way, we can resume the way  
 19 we've done things in the past.  
 20 Obviously you may hear things that you don't like to  
 21 hear, and people may feel strongly about some of the  
 22 evidence, but it's very important, if the Inquiry's  
 23 going to hear the evidence that it needs to hear in  
 24 order to get to the bottom of things, that the witnesses  
 25 are allowed to give their evidence, as I say, with

1 dignity and respect from everyone.  
 2 FROM THE FLOOR: Sorry, Sir Martin, can I also just make a  
 3 point and make it clear: these people are not bereaved  
 4 and survivors.  
 5 SIR MARTIN MOORE-BICK: I don't know who they are.  
 6 FROM THE FLOOR: I'm telling you, they are not -- we've been  
 7 here from day 1 --  
 8 SIR MARTIN MOORE-BICK: I recognise most of the faces I see  
 9 in front of me, and I'm very pleased to see you here  
 10 every day, and I know how strongly you feel about all  
 11 this. I didn't recognise those people. I may have seen  
 12 them before, I don't know. I'm sure you will understand  
 13 that we cannot tolerate that sort of disruption,  
 14 otherwise we shall not get the evidence we need.  
 15 FROM THE FLOOR: Yeah, I'm just making it clear,  
 16 Sir Martin --  
 17 SIR MARTIN MOORE-BICK: Don't worry, I wasn't going to  
 18 impute their motives to you.  
 19 FROM THE FLOOR: And we don't condone these types of  
 20 actions. We're here to listen.  
 21 SIR MARTIN MOORE-BICK: Yes, I understand. Thank you very  
 22 much.  
 23 All right. Mr Kuszell is waiting. He can come  
 24 back.  
 25 (The witness returned)

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1 SIR MARTIN MOORE-BICK: Mr Kuszell, I'm sorry about that  
 2 interruption.  
 3 THE WITNESS: I'm sorry too.  
 4 SIR MARTIN MOORE-BICK: We are ready to resume your  
 5 evidence.  
 6 THE WITNESS: Yes.  
 7 SIR MARTIN MOORE-BICK: Thank you.  
 8 Yes, Mr Millett.  
 9 MR MILLETT: Thank you, Mr Chairman.  
 10 Mr Kuszell, first of all I want to ask you some  
 11 questions about your qualifications and your experience.  
 12 You have set out your experience in paragraphs 10  
 13 to 12 of your Inquiry witness statement, and you have  
 14 put up a CV, which is at AJK/1, page 32. If we can have  
 15 that, please. That's {SEA00014272/33}. That's your CV.  
 16 A. Yes.  
 17 Q. Just having a look at it, your CV doesn't, I think, set  
 18 out your education, but can I ask you this: are you  
 19 a registered architect?  
 20 A. Yes.  
 21 Q. Where did you train as an architect?  
 22 A. At the Polytechnic of Central London.  
 23 Q. When was that, please?  
 24 A. It was from 1968 to 1974.  
 25 Q. You are a founding member of Studio E, which was set up,

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1 I think, in 1994; is that right?  
 2 A. Correct.  
 3 Q. Where did you work before you set up Studio E?  
 4 A. I worked with a company called Farmer & Dark.  
 5 Q. Where was that?  
 6 A. In London.  
 7 Q. And in what capacity did you work there?  
 8 A. I was there for 20 years and I rose through the ranks to  
 9 become a director.  
 10 Q. In what sort of sectors were you working during your  
 11 time there?  
 12 A. Quite varied. I worked in -- well, my first project  
 13 with the practice was the Queen Elizabeth Courthouse in  
 14 Liverpool, which is a very large project. Subsequently,  
 15 I worked on a defence contract, which I probably  
 16 shouldn't say too much about. And then subsequently  
 17 I went into some commercial development work and finally  
 18 into educational work.  
 19 Q. Do you have any, or did you as at 2012, personal or  
 20 professional experience of overcladding residential  
 21 high-rise buildings?  
 22 A. No. Personally, no.  
 23 Q. Were you a member of the RIBA between 2012 and 2016?  
 24 A. Yes.  
 25 Q. Now, if you look at your CV on the screen, please, it

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1 says in the first paragraph, in the second line, that  
 2 you have a particular focus on sports/leisure design.  
 3 That's right, is it?  
 4 A. That is correct.  
 5 Q. If we look down the page a little bit, on the screen, if  
 6 you can be scrolled down a bit, under "Project  
 7 Experience", you can see the projects listed there.  
 8 If you just cast an eye over those projects,  
 9 Mr Kuszell, they are all sports, leisure or education  
 10 projects, aren't they?  
 11 A. They are.  
 12 Q. As a registered architect, you are -- is this right? --  
 13 required to undertake continuing professional  
 14 development, or CPD?  
 15 A. Yes.  
 16 Q. How many hours or points per year, as at 2012, were you  
 17 required to take?  
 18 A. Offhand, I can't quote. I did respond to the issue of  
 19 our undertaking CPD in a letter to the Inquiry to  
 20 clarify how we undertook it, and that applied to all of  
 21 us in different ways. So young architects would  
 22 undertake it one way; senior, more experienced, in  
 23 another; and partners, directors, in yet another way.  
 24 Q. Were you personally required to keep records of your  
 25 CPD?

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1 A. Strictly speaking, yes, but again, as I reported in the  
 2 letter to the Inquiry, not all of us were as diligent as  
 3 we might have been to maintain the records. That didn't  
 4 mean that we didn't actually do the CPD.  
 5 Q. Let me ask you directly : did you keep any records of  
 6 your own CPD?  
 7 A. Yes, by diary and note form, yes, I did.  
 8 Q. Right.  
 9 Did Studio E have a policy of retaining annual CPD  
 10 record sheets?  
 11 A. Yes, it did, and we kept a register of CPD talks that  
 12 were held in the practice, and we also had a format for  
 13 recording CPD by our staff.  
 14 Q. Were those records kept during the years 2012 to 2016?  
 15 A. As I mentioned earlier, they weren't kept as thoroughly  
 16 as I would have liked. It was always a struggle to get  
 17 everybody to complete these records.  
 18 Q. Who oversaw the maintenance of the CPD records at  
 19 Studio E LLP and, after that, Studio E Architects  
 20 Limited?  
 21 A. We had office management that actually kept an eye on  
 22 those, and actually issued reminders to everybody to  
 23 complete them.  
 24 Q. The office management, who were they responsible to?  
 25 A. To eventually the directors, the partners.

13

1 Q. That included you, did it?  
 2 A. That would have included me.  
 3 Q. Do you know if those records still exist?  
 4 A. Some do, but not all, because the LLP folded in 2014,  
 5 and, therefore, at that stage, we lost some of the  
 6 records.  
 7 Q. Now, I want to move on to Studio E. You have said in  
 8 paragraph 17 of your statement -- if we could please  
 9 have that up, it's {SEA00014271/4}. If you just have  
 10 a look at that, you say:  
 11 "The core of the practice's work ..."  
 12 It's paragraph 17.  
 13 A. Yes.  
 14 Q. "The core of the practice's work has rotated around  
 15 education, sports/leisure recreational and commercial  
 16 work with sensitivity towards designing buildings that  
 17 were environmentally sensitive."  
 18 Do you see that?  
 19 A. Yes.  
 20 Q. Does that mean that you had a particular interest in  
 21 designing greener buildings?  
 22 A. If you mean that we were interested in actually making  
 23 a difference in the environmental impact of our  
 24 buildings, yes.  
 25 Q. Does it follow from that that you and the practice, if

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1 I can use a loose expression, would have some  
 2 familiarity with products designed to achieve good  
 3 thermal performance?  
 4 A. Yes.  
 5 Q. Now, the Grenfell Tower project had a construction  
 6 budget of about £8.5 million; you remember that?  
 7 A. I recall that that was the budget.  
 8 Q. Yes. It doesn't matter about the exact figure for the  
 9 moment.  
 10 How did that compare with other projects that your  
 11 practice was undertaking at the time, namely 2012  
 12 onwards?  
 13 A. It would be difficult to make a comparison, because we  
 14 were typically doing projects ranging anywhere between  
 15 15 and 30 million, on a large number of schools as well  
 16 as a smaller number of leisure projects. I don't think  
 17 that that would have given us a gauge to measure the  
 18 budget for the Grenfell Tower.  
 19 Q. Well, let me ask it slightly differently : was the  
 20 Grenfell Tower project budget, at £8.5 million or so,  
 21 bigger or smaller or about average for the kinds of size  
 22 of project that Studio E typically would undertake in  
 23 2012 onwards?  
 24 A. It was probably at the lower end of the -- we did a wide  
 25 range of projects. We were still doing small projects

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1 which would have been a good deal smaller than Grenfell,  
 2 but the larger proportion of our work was somewhere  
 3 between the 15 and 30 million mark.  
 4 Q. Thank you.  
 5 Now, we know that there were two entities : Studio E  
 6 Architects Limited, SEAL, and Studio E LLP.  
 7 Studio E Architects Limited, that was registered in  
 8 1994, wasn't it?  
 9 A. Yes.  
 10 Q. And it still exists today; yes?  
 11 A. Yes.  
 12 Q. And Studio E LLP, that was founded, I think, in 2007;  
 13 correct?  
 14 A. Yes.  
 15 Q. And it started trading in 2011 --  
 16 A. Correct.  
 17 Q. -- is that right? It then entered into creditors'  
 18 voluntary liquidation in 2014.  
 19 A. Correct.  
 20 Q. Can you remember the month in which it did that, even  
 21 roughly?  
 22 A. July.  
 23 Q. Can you tell me, what was the purpose of having these  
 24 two entities side by side?  
 25 A. The main thrust of it was we took accountancy advice and

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1 we were looking to increase the directorship,  
 2 partnership level in the practice from the three to  
 3 a greater number, and we were advised that the LLP would  
 4 be a better vehicle for doing that.  
 5 Q. I see. So it was to extend, as it were, commercial  
 6 participation to a wider number of people?  
 7 A. Correct.  
 8 Q. I see.  
 9 Can I ask you to look, please, at paragraph 16 of  
 10 your witness statement, which is {SEA00014271/4}.  
 11 Now, you say in paragraph 16:  
 12 "SEAL is a small company."  
 13 You see that, and you say that:  
 14 "As at 31 March 2017 we employed 12 staff and our  
 15 net assets were £48,803."  
 16 You see that?  
 17 A. Yes.  
 18 Q. But you go on to say:  
 19 "... [it] had been a larger practice, and employed  
 20 up to 45 staff and by way of illustration, as at 30 June  
 21 2008, the net assets of SEAL were £168,048."  
 22 A. Yeah.  
 23 Q. Why did you start trading as an LLP in 2011?  
 24 A. There was a lot of discussion between the directors as  
 25 to when we should consider other younger members of the

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1 practice being elevated to a directorship, and we  
 2 spanned quite an age group; the eldest director is seven  
 3 or eight years older than me, and the younger director  
 4 was a good 15 years younger than me. So there were  
 5 different views about all of this, and it was only in  
 6 2011 that we concluded that we really ought to be doing  
 7 something on this front and we launched the LLP.  
 8 Q. I see. Was that also for the purposes of raising  
 9 capital?  
 10 A. No.  
 11 Q. So you didn't ask the new participants in the LLP to put  
 12 in any money?  
 13 A. No.  
 14 Q. I see.  
 15 What happened to SEAL, Studio E Architects Limited,  
 16 the company, in the period 2011 to 2014?  
 17 A. It became not entirely dormant, but its trading ran down  
 18 and the LLP effectively took all the new work.  
 19 Q. Right.  
 20 How many registered architects were working at  
 21 Studio E LLP in the period 2011 to 2014?  
 22 A. I would need to check our records on that. We  
 23 predominantly employed fully qualified architects, and  
 24 so the vast proportion would have been qualified in the  
 25 UK or elsewhere, because architecture typically actually

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1 attracts employees from all over the world. So if you  
 2 need the answer to that, I would need to check it.  
 3 Q. Let's see if we can get to it more shortly.  
 4 At paragraph 16 of your statement, which is on the  
 5 screen --  
 6 A. Yeah.  
 7 Q. -- you say that Studio E had been a larger practice and  
 8 employed up to 45 staff.  
 9 A. Correct.  
 10 Q. During the period 2011 to 2014, were those 45 staff, or  
 11 maximum 45 staff, employed by Studio E LLP?  
 12 A. Yes.  
 13 Q. I see, thank you.  
 14 When Studio E Architects Limited, the company which  
 15 had been dormant, took over the Grenfell project in  
 16 2014, what was the size of the employees of that company  
 17 as opposed to the LLP?  
 18 A. I think it was nine.  
 19 Q. Were any of the Studio E LLP employees moved over --  
 20 A. Yes.  
 21 Q. -- from LLP to Limited?  
 22 A. In fact, I think the whole lot, all nine, were moved  
 23 from LLP to Limited.  
 24 Q. I see, okay.  
 25 How many registered architects were working at

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1 Studio E Architects Limited from 2014 to 2016?  
 2 A. Again, I would need to check the number. They were all  
 3 architects. How many of them were actually registered  
 4 in the UK, again, I would have to get back to you to  
 5 verify that number.  
 6 Q. Right.  
 7 Am I correct in thinking that Studio E, in either of  
 8 its forms -- LLP or Limited -- had never before the  
 9 Grenfell Tower project undertaken a project involving  
 10 overcladding a high-rise residential tower?  
 11 A. Sorry, did you ask any of the employees or anybody -- or  
 12 the practice?  
 13 Q. Well, the practice, in either of its forms.  
 14 A. No, it didn't.  
 15 Q. Did Studio E, in either of its forms, have any  
 16 experience of high-rise residential projects at all?  
 17 A. As a practice, no.  
 18 Q. What about refurbishment of tower blocks?  
 19 A. Again, no.  
 20 Q. What about overcladding existing buildings, whether or  
 21 not they were tower blocks?  
 22 A. Yeah, we would have had some element of that, because we  
 23 were involved in not only building new schools but also  
 24 refurbishing old schools.  
 25 Q. Would you agree with this general proposition,

20

1 Mr Kuzzell: those types of projects -- high-rise  
 2 residential projects, refurbishment of tower blocks --  
 3 give rise to particular technical considerations or  
 4 challenges which might differ from those which may arise  
 5 when you're building a new school or a sports facility ?  
 6 A. Yes, I would agree that it is a different set of  
 7 challenges.  
 8 Q. I'm going to turn now to questions about your  
 9 familiarity with the regulatory regime, if I may.  
 10 A. Can I actually add a rider to the answer of the previous  
 11 thing?  
 12 Q. Yes, of course.  
 13 A. I'm a founder of the practice, and there was a time when  
 14 every project that we did was a new project. So there  
 15 was our first extension to a school, our first small  
 16 sports facility, and we did all our projects to a very  
 17 high standard even though they were the first, actually  
 18 receiving huge accolades and a lot of recognition. So  
 19 the issue of whether a project poses new challenges is  
 20 not, I think -- if that is the implication, that somehow  
 21 we were not capable of doing the project, I think that  
 22 is false, because clearly every project -- in your  
 23 experience, there comes a point when every project is  
 24 a first, and we had actually been dealing with projects  
 25 of quite some sophistication and complexity as firsts.

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1 Leisure centres are not at all straightforward projects  
 2 and we did them to a very, very high standard.  
 3 Q. Can I now turn, as I was going to, to your familiarity  
 4 with the regulatory regime. I'm going to start with the  
 5 CDM Regulations. Do you understand what I mean when  
 6 I refer to the CDM Regulations?  
 7 A. Yes.  
 8 Q. What did you understand, as at 2012, Studio E's duties  
 9 were under the CDM Regulations?  
 10 A. Our duties were to design buildings in a safe manner and  
 11 buildings that would actually be safe in the way they  
 12 were used.  
 13 Q. Yes. As a "designer" -- it's a word used in the  
 14 regulations --  
 15 A. Yes.  
 16 Q. -- you were aware, were you, that Studio E -- and  
 17 I think this is Studio E Limited for this purpose --  
 18 owed duties to its client when preparing or modifying  
 19 a design; yes?  
 20 A. Yes.  
 21 Q. You have mentioned duties to design in a safe manner.  
 22 Is there anything else you would wish to add to that?  
 23 A. Yes. The practice is ISO 9001 registered. It has  
 24 a health and safety policy. That health and safety  
 25 policy is updated as required, and every member of the

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1 practice is actually obliged to sign that they've  
 2 actually read the policy and understood its contents.  
 3 Q. Who was it within Studio E, at board or partner level,  
 4 as at 2012, who was tasked with ensuring compliance with  
 5 health and safety duties, including CDM compliance?  
 6 A. Health and safety in our practice was structured, so  
 7 I was actually the director in charge of health and  
 8 safety co-ordination. That imposed a structure across  
 9 the practice. So partners and senior management were  
 10 designated with different roles within the health and  
 11 safety process to ensure that the health and safety  
 12 policy was performed.  
 13 Q. What were those different roles, just exploring that  
 14 answer a bit more? What were those different roles?  
 15 A. Well, we split it into two: health and safety that was  
 16 related to the administering of our office and our  
 17 staff, and health and safety that was related to project  
 18 and site safety.  
 19 Q. Who was in charge, as at 2012 through to 2016, of  
 20 administering the health and safety relating to projects  
 21 and site safety?  
 22 A. My partner at that time, Garry Stewart.  
 23 Q. Garry Stewart, okay.  
 24 Did anybody supervise Garry Stewart's oversight of  
 25 that aspect of Studio E's health and safety work?

23

1 A. Well, I would say that the board had a responsibility to  
 2 ensure that things were happening as they should.  
 3 Q. Right.  
 4 I'm going to turn to the Building Regulations, and  
 5 I'm going to ask you first some very general questions  
 6 about your own familiarity with them and the approved  
 7 guidance.  
 8 In 2012, when Studio E started work on  
 9 Grenfell Tower, were you aware of the requirements of  
 10 schedule 1, part B, fire safety, of the Building  
 11 Regulations 2010?  
 12 A. Yes, I would have been aware.  
 13 Q. You would have been aware. Were you aware of part B3,  
 14 internal fire spread?  
 15 A. I was aware, yes.  
 16 Q. And what about part B4, external fire spread?  
 17 A. Yes.  
 18 Q. At the outset of your work on the Grenfell Tower  
 19 project, did you take any steps to familiarise yourself  
 20 or re-familiarise yourself with the particular  
 21 requirements of those two parts of the building  
 22 regulations, schedule 1, part B3 and B4?  
 23 A. Personally, I didn't. I think, as you stated at the  
 24 outset, I was not hands-on involved on the project. So  
 25 at that time I was actually involved in the Kensington

24

1 Aldridge Academy in a much more direct way, as well as  
 2 having various other duties in the practice. So  
 3 familiarising myself against specific regulations in  
 4 relation to the tower was devolved on others in my  
 5 practice.

6 Q. On whom?

7 A. Well, the lead was taken by my colleague Bruce Sounes.

8 Q. Right.

9 When Studio E secured the commission for  
 10 Grenfell Tower in 2012, does it follow from what you  
 11 have just said that you didn't actually go back and  
 12 re-read schedule 1, parts B3 and B4, you left that to  
 13 Mr Sounes?

14 A. Correct.

15 Q. Did you at any time after that look at schedule 1, parts  
 16 B3 and B4, of the Building Regulations?

17 A. In relation to the tower?

18 Q. Yes.

19 A. No.

20 Q. Did it occur to you in 2012, at the time that you got  
 21 the commission for the Grenfell Tower project, that  
 22 because the project involved an external wall  
 23 construction on a building over 18 metres in height,  
 24 there were building regulations and there was guidance  
 25 that pertained to that?

25

1 A. Sorry, can you repeat that question?

2 Q. Yes. Did it occur to you, did it go through your mind,  
 3 that because the project that you had won through the  
 4 commission involved an external wall construction on  
 5 a building exceeding 18 metres in height, there were  
 6 relevant building regulations and guidance about it?

7 A. I guess it would have occurred to me, yeah.

8 Q. Do you remember it occurring to you or are you just  
 9 speculating about your memory?

10 A. I'm not really speculating. I think the -- at the time  
 11 when we got the commission, which was not, shall we  
 12 say -- we won a project which was for an academy and  
 13 a leisure centre, as well as also a piece of residential  
 14 development, and then the Grenfell Tower entered the  
 15 equation.

16 I recall that my colleague Bruce Sounes actually  
 17 texted me or emailed me saying that we would need to  
 18 actually do some rapid CPD on the subject of the tower,  
 19 because it was something which was not in our normal  
 20 experience, and I think at that point I would have  
 21 registered that there were issues relating to the tower,  
 22 both in terms of, you know, regulations and codes that  
 23 we had to familiarise ourselves with, yes.

24 Q. Very well. We will come back to that.

25 A. Yeah.

26

1 Q. As a general question, do you agree that fire safety is  
 2 fundamental to the work of an architect's practice?

3 A. Yes.

4 Q. Do you agree that fire risks are one of the key areas  
 5 that need to be mitigated so far as reasonably  
 6 practicable when you're fulfilling CDM and health and  
 7 safety obligations?

8 A. Yes.

9 Q. Would you also agree that any competent architect would  
 10 have an awareness at least of existence, importance and  
 11 purpose of the fire related provisions in the Building  
 12 Regulations and the associated approved documents?

13 A. Yes.

14 Q. As a slightly less general question, a bit more  
 15 specific, when you started work on the Grenfell Tower  
 16 project, and making all allowances for the fact that you  
 17 were not involved in the day-to-day detail, did you  
 18 appreciate that the essential objective of schedule 1,  
 19 part B of the Building Regulations is to slow the spread  
 20 of any uncontrolled fire and smoke, and to preserve the  
 21 integrity of the overall structure and compartments of  
 22 a building?

23 A. You're asking me quite a technical question, and I'm  
 24 hesitating to answer it because I think if I was working  
 25 on the project, I would have definitely been considering

27

1 the implications of what you've just said, but I wasn't  
 2 working on the project.

3 Q. Right. So is that a question for Mr Sounes rather than  
 4 for you?

5 A. I think it should be for the people who were working on  
 6 the project.

7 Q. All right.

8 Can I ask you to look at Approved Document B, and,  
 9 given your answers so far, we needn't take very long on  
 10 it, but it's useful to have it up on the screen. It's  
 11 {CLG00000224}. There it is: fire safety, Approved  
 12 Document B, under the Building Regulations 2010.

13 Just looking at the first page of that document,  
 14 were you familiar, at least even in general terms, with  
 15 this particular version of Approved Document B at the  
 16 outset of your involvement in the Grenfell Tower  
 17 refurbishment?

18 A. Yes.

19 Q. Can you remember ever having attended any courses which  
 20 educated you on the guidance contained in this document,  
 21 Approved Document B?

22 A. No, I didn't attend any courses specifically training me  
 23 to apply that document. In the past, I would have been  
 24 trained how to use a document similar to this, but this  
 25 specific document, I did not receive any specific

28



1 training, no.  
 2 Q. As a firm or company -- let me use the word "practice"  
 3 to cover both entities -- did Studio E have any system  
 4 whereby when updates to regulations and guidance such as  
 5 Approved Document B came into force, were published by  
 6 the government, Studio E received them and disseminated  
 7 them among its practising staff?  
 8 A. The procedure we followed was that each time a new  
 9 project entered the practice, it would be set up on the  
 10 system and it would move into various work stages. So  
 11 typically in architecture we don't start designing the  
 12 building on day 1. We're very frequently involved in  
 13 developing a brief with the client and appointing  
 14 a team, either directly or on behalf of the client, and  
 15 so information starts to accumulate. Typically when it  
 16 comes to fire, it's very rare for us these days to  
 17 actually be working on a project without a fire  
 18 consultant.  
 19 Q. Right.  
 20 A. And when it comes to the fire regulations, which have,  
 21 as you can see from this document, become increasingly  
 22 voluminous and actually at times difficult to interpret,  
 23 it's critical to get involved with building control as  
 24 early as possible, and, when you're dealing with any  
 25 project which has any order of complexity, then a fire

1 consultant is essential to guide you through.  
 2 Q. Right. So I think the answer to my question was no. My  
 3 question, just to repeat it again, was: when a document  
 4 or an update to regulations and guidance such as  
 5 Approved Document B comes into force, does Studio E  
 6 generally receive them and then disseminate them?  
 7 A. No, the answer isn't no; the answer is that your  
 8 familiarity with regulations is only as good as the most  
 9 recent project you're doing. So every project would  
 10 actually generate an upgrade of the information that was  
 11 available. So typically the information would actually  
 12 go into a central file which was accessible to all  
 13 people in the practice, and of course much of this  
 14 information is also available online.  
 15 Q. Right.  
 16 A. So the drill is, just to answer the question and be  
 17 clear, that on every project we wouldn't assume that  
 18 because we had read the building regulations a year or  
 19 two years or three years previously, those were the  
 20 regulations we were applying; we would be looking to the  
 21 current regulations.  
 22 Q. A similar question in relation to industry guidance:  
 23 were you at any stage of the Grenfell Tower project  
 24 familiar yourself with industry guidance for cladding,  
 25 such as, for example -- and there are others -- the CWCT

1 standard?  
 2 A. Personally, I wasn't, no.  
 3 Q. Would the same apply -- I suppose it would -- in  
 4 relation to the CWCT Technical Note 73 and BCA technical  
 5 guidance notes?  
 6 A. Without looking at them, I can't comment.  
 7 Q. All right.  
 8 Now, I want to turn to the initial brief for the  
 9 project, and start with KALC.  
 10 It's right, isn't it, that Studio E won the  
 11 commission for the Kensington Academy and Leisure  
 12 Centre, or KALC, through a competitive procurement  
 13 process?  
 14 A. Yes.  
 15 Q. And that process had been, I think -- is this right? --  
 16 advertised by the Royal Borough of Kensington and  
 17 Chelsea, or RBKC, through the Official Journal of the  
 18 European Union; yes?  
 19 A. Yes.  
 20 Q. Was that in 2011, do you remember?  
 21 A. Yes, it was in 2011.  
 22 Q. Do you remember when in 2011?  
 23 A. I think we secured the commission in September 2011, so  
 24 it would have been in the earlier parts, sort of early  
 25 summer, late spring, that the whole process started.

1 I think it must have been around about May. I can't be  
 2 certain.  
 3 Q. Right. Now, do you agree -- and I'm going to ask you  
 4 three things and see if you agree with them -- that,  
 5 first, the purpose of undertaking a competitive  
 6 procurement exercise includes securing best value for  
 7 money?  
 8 A. I think you should ask the client that question.  
 9 Q. No, but I'm asking you, as an experienced architect,  
 10 Mr Kuszell. From your perspective and experience, the  
 11 purpose of undertaking a competitive procurement would  
 12 include securing for the client best value for money;  
 13 no?  
 14 A. The best value.  
 15 Q. Best value for money.  
 16 A. Well, you're adding "money", and I'm saying "best  
 17 value".  
 18 Q. All right. Is there a difference?  
 19 A. I think so.  
 20 Q. What is that difference?  
 21 A. If you believe that the architects you're appointing  
 22 actually might do something which is that much better  
 23 and maybe costs a little bit more.  
 24 Q. The second purpose of an undertaking of a competitive  
 25 procurement exercise is -- is this right? -- appointing

1 an architect with the level of skills , knowledge and  
 2 experience which is appropriate for and suited to the  
 3 work involved in it ; do you agree with that?  
 4 A. Yes.  
 5 Q. Would you also agree that the purpose of a competitive  
 6 procurement exercise would be compliance with public  
 7 authority obligations to conduct fair tender procedures?  
 8 A. You're asking me here to answer a question on behalf of  
 9 the client ; yes?  
 10 Q. Well, I'm asking you from your experience again. The  
 11 purpose of a competitive procurement exercise would be  
 12 compliance with public authority obligations , assuming  
 13 the client was a public authority, to conduct a fair  
 14 tender procedure?  
 15 A. I would assume that they would have to respect their own  
 16 procedures, yes.  
 17 Q. All right .  
 18 Now, you say -- and this is paragraph 27 of your  
 19 statement. If we could just have that up, actually .  
 20 It's {SEA00014271/7} .  
 21 Thank you.  
 22 Page 7, paragraph 27 --  
 23 A. Yeah.  
 24 Q. -- you say there, fourth line :  
 25 "Amongst the selection criteria there was the

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1 requirement to have three academies and three leisure  
 2 centres completed in the previous five years."  
 3 You go on to say:  
 4 "We were one of a few practices who could qualify."  
 5 Do you see that?  
 6 A. Yes.  
 7 Q. How many others, would you say, could compete with you  
 8 for that project, KALC, on your track record?  
 9 A. I would struggle to make a judgement on that. There  
 10 would have been quite a number.  
 11 Q. Right. But it's right, is it, that RBKC, who was the  
 12 client on that, I think we can agree, were looking for  
 13 a very experienced and highly specialised architectural  
 14 practice to undertake the KALC project?  
 15 A. Yes.  
 16 Q. The selection process for the KALC project, was that  
 17 very rigorous?  
 18 A. We --  
 19 Q. So far as you knew.  
 20 A. As far as we understood, yes, it was rigorous.  
 21 Q. You go on to say -- I think this is over the page,  
 22 page 8 {SEA00014271/8}, same paragraph, in the third  
 23 line :  
 24 "Our win was a major achievement for the practice."  
 25 You see that?

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1 A. Yes.  
 2 Q. So it's right, is it, that KALC was a highly prized  
 3 project --  
 4 A. Yes.  
 5 Q. -- so far as you were concerned? Yes.  
 6 Now, at that stage, when you won the tender in 2011,  
 7 the Grenfell Tower project was not part of the project  
 8 you had won, was it?  
 9 A. No.  
 10 Q. Would it follow from that that your suitability for  
 11 undertaking design work on a refurbishment of  
 12 Grenfell Tower did not form part of the assessment in  
 13 the KALC procurement?  
 14 A. No.  
 15 Q. Now, again, just to be crystal clear about this, it was  
 16 RBKC -- is this right? -- who selected Studio E as the  
 17 architect for the KALC project, not the TMO?  
 18 A. I couldn't be categoric on that, because I wasn't party  
 19 to any discussions that may have occurred between RBKC  
 20 and TMO.  
 21 Q. Fair enough. But from your perspective, as far as you  
 22 understood it at the time.  
 23 A. Again, I cannot be categoric. The first it was  
 24 mentioned to us was through RBKC.  
 25 Q. Right.

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1 Now, if you stick with paragraph 27, on page 8 of  
 2 your statement, where we are, you go on to say:  
 3 "Following our appointment we were required to  
 4 procure further services, including a fire engineer."  
 5 Who did you procure to act as a fire engineer on  
 6 KALC?  
 7 A. Exova.  
 8 Q. Did Studio E retain them or did RBKC retain them?  
 9 A. For?  
 10 Q. For the KALC project.  
 11 A. They were employed to us.  
 12 Q. When you say they were employed to you --  
 13 A. Yeah, they were a subconsultant to Studio E.  
 14 Q. I see what you mean. So Studio E entered into  
 15 a contract, did they, with Exova?  
 16 A. Correct.  
 17 Q. I see. Do you remember who it was at Exova who you were  
 18 negotiating that contract with?  
 19 A. No. I mean, there will be a record, but I cannot  
 20 remember.  
 21 Q. Okay.  
 22 Did you oversee the entry by Studio E into the  
 23 contract with Exova for the KALC project?  
 24 A. Yes, I would have been involved in their appointment.  
 25 Q. Right. Do you know who else at Studio E would have been

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1 involved in Exova's appointment as fire engineer on the  
2 KALC project?  
3 A. I would have discussed it with my team, probably  
4 Bruce Sounes and Neil Crawford, who were working closely  
5 with me at the time.  
6 Q. Do you remember who it was at Exova who produced reports  
7 to Studio E for the KALC project?  
8 A. No, I cannot -- I mean, it's so long ago, I cannot  
9 recall it. I repeat, we will have records of all this,  
10 but I cannot recall.  
11 Q. Do you remember who at Studio E was receiving and  
12 examining Exova reports in respect of the KALC project?  
13 A. At that time we had several senior people working on  
14 KALC, and they would have been liaising with Exova on  
15 the various measures that were being recommended for the  
16 scheme.  
17 Q. Are you able to tell me who those several senior people  
18 were?  
19 A. Yes. I mean, the -- Neil Crawford was one. If  
20 I remember correctly there was an architect called  
21 Markus Kiefer who was working on the project at that  
22 stage.  
23 Q. Yes. Anybody else?  
24 A. There was quite a team, so ...  
25 Q. All right.

1 Now, you say in the same paragraph -- before I move  
2 on to that, can I just ask you: were you generally happy  
3 with Exova's work on the KALC project?  
4 A. We had worked with Exova and I think they were called  
5 Warrington before that --  
6 Q. Warringtonfire, I think.  
7 A. Warringtonfire -- for quite a long period. They had  
8 been our consultant of choice on a series of schools.  
9 Q. Right. You say a consultant of choice; how far back in  
10 time did your relationship or experience --  
11 A. You're really testing the memory, because we're going  
12 back into, you know, probably the sort of mid-noughties.  
13 Q. Okay. We may come back to that in due course.  
14 Can I move on in your statement. Same paragraph,  
15 just a bit lower down on the same page, let's look  
16 together at the sixth line down. You say:  
17 "In considering the implications of the proposed  
18 development it was clear that in urban planning terms  
19 the interface with the Tower was a very important  
20 factor, particularly for KALC which would be so close to  
21 its base."  
22 Do you see that?  
23 A. Yes.  
24 Q. Did you mean, when you wrote that, that the appearance  
25 of the tower would have a detrimental or some other

1 effect on the aesthetics of KALC?  
2 A. I think I meant ... if you permit me to -- which precise  
3 part of this paragraph are you referring to?  
4 Q. Okay, so it's the second from last sentence, middle of  
5 the paragraph, where you say:  
6 "In considering the implications of the proposed  
7 development ..."  
8 You go on to say:  
9 "... it was clear that in urban planning terms the  
10 interface with the Tower was a very important factor,  
11 particularly for KALC which would be so close to its  
12 base."  
13 So we're looking at that sentence. Just focusing on  
14 that sentence, did you mean there that the appearance of  
15 the tower would have perhaps a detrimental effect on the  
16 aesthetics of KALC?  
17 A. No.  
18 Q. What did you mean?  
19 A. I meant that, in urban terms, there was a sensitivity  
20 between a residential tower, which already existed, and  
21 the way you configured a school close by.  
22 Q. What were those implications, then, that you're speaking  
23 of here?  
24 A. Perhaps it's best answered by describing the approach we  
25 took in our second stage of us winning the project, in

1 terms of -- we had to produce a design, in competition  
2 with the other five practices who were -- the other five  
3 teams, and our approach was to adopt a ribbon solution  
4 to the school, something we had actually done very  
5 successfully on other schemes. The reason why we  
6 adopted the ribbon solution was because we knew that we  
7 could, like a ribbon, maximise the distance between the  
8 school building and the tower, which we thought was  
9 an important thing to do in terms of the sensitivity of  
10 the relationship of the two. And so that is a good  
11 example of how we approached the contextual urban  
12 equation that was posed by the site and the tower.  
13 Q. Did the presence of the tower create any particular  
14 design or urban planning problems for KALC that wouldn't  
15 exist if the tower had not been there?  
16 A. Yeah, there were quite a few. I mean, it was -- we were  
17 placing a school on a site where there had been no  
18 school there, there had been open multi-use games areas  
19 and a car park, so we were creating a new building of  
20 some significance on a site which had constraints in  
21 every direction you could look at. So the tower was one  
22 of the issues, which clearly there is the issue of  
23 overlooking, potential concerns from the tower's  
24 perspective of noise generated by the school. There are  
25 issues of -- very complex issues of boundaries because

1 the land ownership had got very complicated in that  
 2 area, so in every boundary there were problems to be  
 3 resolved by the council that affected actually our  
 4 definition of what actually would become the final  
 5 school site .  
 6 Q. Right. So would it be right to say in perhaps general  
 7 or summary terms that the tower posed some limitations  
 8 on what you could do with the external surroundings of  
 9 the KALC scheme?  
 10 A. Yes, but that's not unusual in an urban context.  
 11 Q. Would it be right to say that Grenfell Tower was viewed,  
 12 so far as you knew, as a problem for KALC which needed  
 13 to be solved?  
 14 A. I don't think we actually ever saw it that way.  
 15 Q. Okay. How did you see it?  
 16 A. We saw it as a constraint of the site . We are very  
 17 familiar -- in fact, I would say that we have  
 18 a reputation for doing difficult sites well. So in  
 19 a way, constraints generated best -- good solutions, if  
 20 you actually work with the constraints .  
 21 Q. Can you please be shown a document, {TMO10000965/3}.  
 22 Now, this is not an email that you will have seen at  
 23 the time, Mr Kuszell, so let me start, to be fair to  
 24 you, by making that clear . It's an email from  
 25 Jane Tretheway at HHASC Housing to Mark Anderson and

1 others at the TMO, "Subject: Grenfell Tower.  
 2 Importance: High".  
 3 In the second paragraph -- if you go to page 3,  
 4 you -- would you just give me a moment? I think we may  
 5 have got a slightly different document on the screen.  
 6 A. No, I've got -- if it's the --  
 7 Q. Yes. Perhaps we will come back to this document. I'll  
 8 come back to it in a moment.  
 9 Could I ask you to go to paragraph 33 of your  
 10 statement, which is on page 9 {SEA00014271/9}. Now, you  
 11 say there, at paragraph 33:  
 12 "On ... 7 December 2011, I was approached by Peter  
 13 Wright of RBKC regarding potential works to the  
 14 Tower ..."  
 15 There is a reference there to an email. Can we have  
 16 that, please. It's {SEA00003556}.  
 17 Now, this is an email from you to Peter Wright at  
 18 RBKC, "Subject: Grenfell Meeting Agenda".  
 19 A. Yeah.  
 20 Q. This is 8 December 2011, and you're referring there to  
 21 a discussion yesterday; do you see that?  
 22 "Peter  
 23 "Further to our discussion yesterday ..."  
 24 A. Yes.  
 25 Q. That would be 7 December 2011. You say in that email:

1 "... I have pulled together a meeting agenda which  
 2 sets out what I think we will need to cover tomorrow."  
 3 A. Yeah.  
 4 Q. If you go, please, to the agenda itself , we can show  
 5 that to you. That's {SEA00003557}, please.  
 6 A. Yeah.  
 7 Q. Here it is :  
 8 "KALC Meeting to Review Potential Works to Grenfell  
 9 Tower to be Held at RBKC Town Hall on Friday 9th  
 10 December at 10.00am.  
 11 "AGENDA."  
 12 Do you see that?  
 13 A. Yes.  
 14 Q. Just casting your eye down it, you can see a number of  
 15 issues or topics for discussion on that day. Is that  
 16 agenda based on your conversation that you had had with  
 17 Peter Wright?  
 18 A. No. At that stage we had absolutely no certainty that  
 19 the tower would be commissioned, that would come our  
 20 way. We knew that there were discussions inside  
 21 Kensington about undertaking works to the tower, and  
 22 Peter had approached me for a sort of early explorative  
 23 meeting, and I always preferred to be prepared, even for  
 24 an exploratory meeting, so that agenda was thrown  
 25 together just to give it some structure.

1 Q. Right. You say it was thrown together; was it you who,  
 2 as it were, threw it together?  
 3 A. Correct.  
 4 Q. I see. So was it you, therefore, who proposed the scope  
 5 of work outlined in your agenda?  
 6 A. It was my -- I cannot remember how much discussion may  
 7 have occurred prior to this , but I created a list ,  
 8 almost like a sort of checklist , of things that might  
 9 come up.  
 10 Q. I see. If you look at item 2, it says:  
 11 "2. Review of work scope.  
 12 "- Windows.  
 13 "- Cladding."  
 14 Do you see that?  
 15 A. Yes, I do.  
 16 Q. Was it you who put those on the agenda for discussion  
 17 with Mr Wright?  
 18 A. I doubt whether I would have said that unless there was  
 19 an indication from somebody at the council that that's  
 20 what they wanted to do.  
 21 Q. Where do you remember getting that indication from, do  
 22 you think?  
 23 A. I attended meetings, SRO meetings, which was basically  
 24 a senior executive meeting which overviewed the project,  
 25 and I'm fairly confident that there would have been

1 mention of the tower as an issue that needed to be  
 2 addressed at some point.  
 3 Q. Do you remember who first suggested cladding to you,  
 4 such that it turned up on this agenda?  
 5 A. It could have been Peter, it could have been Laura.  
 6 I can't think of anybody else at that time I would have  
 7 been speaking to who would have had any knowledge of  
 8 this.  
 9 Q. So Peter Wright or Laura Johnson?  
 10 A. Yes.  
 11 Q. Both at RBKC; yes?  
 12 A. Yes.  
 13 Q. Right.  
 14 So would it be right to say that, from an early  
 15 stage, late in the year 2011, you knew that overcladding  
 16 of Grenfell Tower was likely to form part of any project  
 17 in respect of that building?  
 18 A. Yes, that was the indication that was being given by  
 19 Kensington.  
 20 Q. Do you remember whether Peter Wright had mentioned  
 21 cladding to you on 7 December during the discussion that  
 22 you referred to in your email? I know it's a long time  
 23 ago, but does that trigger a recollection?  
 24 A. If I didn't have the note and the agenda in front of me,  
 25 I wouldn't remember the meeting. I'm sorry, but it's --

1 Q. Okay.  
 2 Before we leave this document, the work scope also  
 3 refers to, in the last bullet point under item 2, do you  
 4 see:  
 5 "Upgrade of externals ..."  
 6 A. Yes.  
 7 Q. "... additional stairs / lift from raised deck, removal of  
 8 existing disused stair, re-landscaping of deck and  
 9 ground level areas north of tower."  
 10 Was that from you, or was that again from  
 11 Peter Wright or Laura Johnson?  
 12 A. Well, it would have been -- I'll have to caveat this  
 13 because obviously I'm trying to recall, but we had been  
 14 working on the academy and leisure project for a couple  
 15 of months at this point, and we had got fairly well into  
 16 trying to analyse all the different boundary conditions  
 17 and relationships with all the various adjoining  
 18 properties. So, from what I can recollect, there was  
 19 discussion about how to improve circulation around the  
 20 tower. So there were discussions afoot to provide a new  
 21 lift which would actually permit pedestrians to come  
 22 down from the first-floor deck down to the ground level,  
 23 there was a discussion about a disused stair, and then  
 24 there was the issue of how the landscape might integrate  
 25 with the deck level.

1 Q. To be blunt about it, can I ask you this: was there  
 2 a feeling in your head that the appearance of  
 3 Grenfell Tower and its surroundings was something of  
 4 an eyesore next to the proposed project for KALC?  
 5 A. You're using very subjective and strong terms, and  
 6 I don't think we would have ... this was an upgrade of  
 7 a very large swathe of that part of Kensington, because  
 8 the new scheme was the academy, the leisure centre, the  
 9 public realm that surrounded it. You could see why  
 10 the council might be thinking that it might be a good  
 11 idea to upgrade the tower.  
 12 Q. That's the council's thinking, you can see that, but  
 13 what about your feeling? That was my question.  
 14 A. Well, I clearly could see that it would be a good idea  
 15 to upgrade the tower if that was the appropriate time to  
 16 do it.  
 17 Q. Because of the way it looked, is what I'm suggesting to  
 18 you.  
 19 A. Erm ... I think you're trying to put words in my mouth,  
 20 and I'm not prepared to say it. I don't think I had  
 21 such a strong view of the tower. I repeat: we work  
 22 within the constraints that we find on every given site,  
 23 and if the tower had remained as it was, then it would  
 24 have remained as it was. There were other motivators  
 25 that actually caused the council, I think, to move on

1 the tower.  
 2 Q. Very well.  
 3 Can I take you back, then, to a document that I had  
 4 tried and failed to show you a moment ago.  
 5 A. Yes.  
 6 Q. Can you go to {TMO10000965/3}.  
 7 A. Yeah.  
 8 Q. The bottom email on that page is the one I wanted to  
 9 show you, which is the one from RBKC, from  
 10 Jane Tretheway, to Laura Johnson and Peter Wright on  
 11 2 November.  
 12 If you go, please, to the bottom of the page, third  
 13 line from the bottom, it says -- I have a device I might  
 14 be able to assist you with, which I was told was going  
 15 to help. Never mind.  
 16 In the last sentence on the bottom of that page, you  
 17 can see it says this:  
 18 "Peter advised that the KALC architects are very  
 19 aware of the poor quality of the ground floor  
 20 frontage ..."  
 21 Do you see that?  
 22 A. Yes.  
 23 Q. "... that Grenfell Tower creates for their scheme, and  
 24 have been keen to make proposals as to how to improve  
 25 it."

1 Now, you were the KALC architect, Mr Kuszell. First  
 2 of all, can I ask you: did you say to Peter Wright that  
 3 you were aware of the poor quality of the ground floor  
 4 frontage that Grenfell Tower creates for your scheme and  
 5 were keen to make proposals for how to improve it? Did  
 6 you say that to him?  
 7 A. First of all, I don't think this is my -- these are my  
 8 words.  
 9 Q. No, you're right, they're not, and I should have told  
 10 you this, this is an email you didn't see at the time.  
 11 A. No.  
 12 Q. It's just recording a discussion within RBKC.  
 13 A. But the answer to your question is that we were working,  
 14 as I've mentioned earlier, across a whole series of  
 15 complex boundaries which required some creative thinking  
 16 about how to reconcile the new development with  
 17 everything that adjoined it, and the boundary around  
 18 Grenfell Tower, over and above actually some parts of it  
 19 being held very dear to the people of Grenfell, was  
 20 actually quite fluid. I mean, there was no physical  
 21 boundary that actually defined exactly what belonged to  
 22 which property. But it was clear that whatever scheme  
 23 came forward, not so much as part of the academy, but  
 24 part of the public realm development, needed to  
 25 reconcile a lot of issues, and this was one of them.

1 Q. Mr Kuszell, let's just take this a little bit more in  
 2 stages.  
 3 My first question is: did you or anybody within  
 4 Studio E to your knowledge tell Peter Wright that you  
 5 were aware of the poor quality of the ground floor  
 6 frontage that Grenfell Tower creates for the KALC  
 7 scheme? Did you say that?  
 8 A. I don't think I would have said it in exactly those  
 9 words, no.  
 10 Q. Well, did you give the sense of it?  
 11 A. I would have given the sense of it in the sense that  
 12 I've already explained to you, that when you have a site  
 13 which has amorphous boundaries and often areas which had  
 14 been perhaps ill-considered or neglected, as part of the  
 15 upgrade of the area, you would have considered it in  
 16 that way.  
 17 Q. And did you say or give the sense of the idea that you  
 18 were keen to make proposals as to how to improve it?  
 19 A. I don't think we had any option but to suggest that,  
 20 because the scheme included the public realm that  
 21 actually directly adjoined the tower, as well as also  
 22 would form the direct public realm adjoining the academy  
 23 and leisure centre.  
 24 Q. Can I ask you to look on in the same email, on page 4  
 25 {TMO10000965/4}, if the operator could turn over the

1 page -- it's a long email.  
 2 A. Yes.  
 3 Q. If you look, please, at the third bullet point down, it  
 4 says this:  
 5 "The TMO is also keen to investigate the opportunity  
 6 to clad Grenfell Tower and replace its windows, and will  
 7 seek to cost this out with a view to investing EPG funds  
 8 here."  
 9 Do you remember that? Do you remember that being  
 10 something the TMO was keen to do?  
 11 A. Can you tell me when exactly this was written?  
 12 Q. 2 November 2011.  
 13 A. No, I wouldn't have been familiar with this  
 14 correspondence at all. I repeat: my awareness of the  
 15 intention to do something with the tower I think almost  
 16 entirely was based on conversations with Peter and the  
 17 meetings I attended at Kensington with Laura Johnson.  
 18 Q. Can I just ask you, then, taking that, noting what you  
 19 have just said, to look at the next two sentences in the  
 20 same bullet point. It says:  
 21 "This will have the advantage of addressing the  
 22 investment needs of one of its worst property assets,  
 23 and prevent it looking like a poor cousin to the brand  
 24 new facility being developed next door. There may be an  
 25 option to have a cladding design that links to the

1 design of the Academy, so that the visual appearance of  
 2 the area is significantly improved."  
 3 Now, I've shown you that. My question to you is,  
 4 Mr Kuszell: is that something or are those things that  
 5 Mr Wright or Ms Johnson ever discussed with you?  
 6 A. I think -- I can only speculate and try to recall,  
 7 because I don't remember exactly what would have been  
 8 said at the time, these are conversations which were  
 9 held nine years ago, so --  
 10 Q. Don't speculate, but do try to recall.  
 11 A. I am trying to recall, and I do know that there were  
 12 discussions about the re-cladding of the building, and  
 13 clearly if it was re-clad then there would be the issues  
 14 of consideration of what the re-clad would be and how  
 15 that actually worked with the development alongside.  
 16 Q. Yes. I mean, did anybody ever say to you that they  
 17 wanted a cladding design that linked to the design of  
 18 KALC so that the visual appearance of the area would be  
 19 significantly improved?  
 20 A. I think that the motivators for re-cladding the building  
 21 were several. I believe it was as much to do with the  
 22 thermal performance of the envelope as it was to  
 23 actually improving the appearance of the building within  
 24 the context of the new development.  
 25 MR MILLETT: Yes, thank you.

1 Mr Chairman, we have been going for an hour. I know  
 2 we had a slightly delayed start. It may be appropriate  
 3 to have a break now. I'm on the same topic but we're  
 4 going to move to a different document.  
 5 SIR MARTIN MOORE-BICK: All right. It would be convenient  
 6 from your point of view?  
 7 MR MILLETT: Yes.  
 8 SIR MARTIN MOORE-BICK: Yes.  
 9 Well, Mr Kuszell, we have a break during the morning  
 10 because many people, not just the witness, find that if  
 11 we run for three hours, it's too long. So we are going  
 12 to take a break now for just over ten minutes.  
 13 I am going to ask you, please, now you have started  
 14 giving evidence, not to discuss your evidence or even  
 15 the subject about which you are speaking to us with  
 16 anyone else until you have finished. All right?  
 17 THE WITNESS: Thank you.  
 18 SIR MARTIN MOORE-BICK: We will rise now and resume at  
 19 11.35, please. Thank you.  
 20 (11.23 am)  
 21 (A short break)  
 22 (11.38 am)  
 23 SIR MARTIN MOORE-BICK: Ready to carry on, Mr Kuszell?  
 24 THE WITNESS: Yep.  
 25 MR MILLETT: Mr Kuszell, a couple of questions just to go

1 over one or two things from earlier this morning in your  
 2 evidence.  
 3 You referred to nine employees or staff members at  
 4 Studio E. Did that include support staff or were they  
 5 all registered architects?  
 6 A. There was one office manager.  
 7 Q. But the rest were registered architects, were they?  
 8 A. The rest were architects or nigh on architects.  
 9 Fundamentally, the practice -- the people who were with  
 10 us were, I think, bar the office manager and one, all  
 11 senior people.  
 12 Q. Right.  
 13 Now, you referred to Garry Stewart this morning as  
 14 the person in charge of the health and safety compliance  
 15 with the CDM Regulations. Just a number of questions  
 16 about that.  
 17 First, was Garry Stewart a registered architect?  
 18 A. Yes.  
 19 Q. Was he a registered health and safety practitioner?  
 20 A. I'm not sure I fully understand what you mean by that.  
 21 He was a fully trained architect, and every architect  
 22 has an obligation to practice responsibly under the  
 23 health and safety regulations.  
 24 Q. Was he actually registered, though, as a health and  
 25 safety practitioner?

1 A. No.  
 2 Q. No. And --  
 3 A. Not to my -- no.  
 4 Q. Did Mr Stewart have any specific training or education  
 5 on health and safety issues which would equip him to  
 6 discharge his duty as a health and safety practitioner?  
 7 A. He personally would not have, but we had an organisation  
 8 supporting us, Croner, who were consultants, and they in  
 9 that period actually carried out a review of our health  
 10 and safety procedures.  
 11 Q. I see. Could you spell their name for me, please?  
 12 A. C-R-O-N-E-R.  
 13 Q. You say they did a review of your health and safety  
 14 procedures. When was that, please?  
 15 A. During 2013.  
 16 Q. Was there a report?  
 17 A. Yes, there --  
 18 Q. A written report, I should say.  
 19 A. There was a written report.  
 20 Q. Who did that written report go to within Studio E, do  
 21 you remember?  
 22 A. It went to all the board members and I think all the  
 23 associates and probably even the senior architects.  
 24 Q. I see. And you read it, did you, I assume?  
 25 A. Yes.

1 Q. Did it give you a clean bill or health or were there  
 2 criticisms in it?  
 3 A. It wasn't that type of report. They were actually  
 4 taking a review for an upgrade of our systems, and  
 5 I remember that there was a bit of frustration because  
 6 we felt that, whereas it was actually fairly strong on  
 7 the sort of admin office side of things, it was perhaps  
 8 less helpful on the project side.  
 9 Q. Did Croner have specific construction and design  
 10 expertise in the health and safety sense?  
 11 A. Yes.  
 12 Q. We may come back to revisit that in due course, if we  
 13 need to.  
 14 Can I move on in time from where we were in the  
 15 emails which we were looking at before. There was  
 16 a meeting on 9 December 2011 with RBKC, and you cover  
 17 that in your statement at paragraph 34. If we could  
 18 have that up on the screen, please, that's  
 19 {SEA00014271/9}, paragraph 34, and you say there:  
 20 "On Friday, 9 December 2011 I attended a preliminary  
 21 meeting at RBKC's town hall with Peter Wright (RBKC) to  
 22 review potential works to the Tower."  
 23 A. Yes.  
 24 Q. "I prepared an agenda for the meeting."  
 25 We have seen that?

1 A. Yes.  
 2 Q. You go on to say:  
 3 "At the meeting Peter Wright would have provided an  
 4 introduction and overview of RBKC's objectives and  
 5 reviewed the scope of potential works."  
 6 Who else attended the meeting, do you remember?  
 7 A. I could not be certain. It may have just been Peter and  
 8 myself.  
 9 Q. Do you remember what RBKC said, if anything, about the  
 10 objective that they wished to achieve through the works  
 11 on or around Grenfell Tower?  
 12 A. As I recall it, they were looking to upgrade the tower  
 13 at the same time as the main KALC project was  
 14 undertaken.  
 15 Q. Did you tell RBKC at that meeting that you had concerns  
 16 about the appearance of Grenfell Tower which had  
 17 an effect on the KALC project?  
 18 A. You keep asking me this point and I keep saying that  
 19 I don't think I was particularly categoric about it.  
 20 I mean, I could see the benefit of having the tower  
 21 refurbished, if that's -- if the council were mindful to  
 22 do it. It wasn't that I was pushing them to actually  
 23 undertake the project.  
 24 Q. Was there any discussion of overcladding Grenfell Tower  
 25 at --

1 A. There may have been. There may have been.  
 2 Q. When you say there may have been, are you saying you  
 3 can't --  
 4 A. Well, it was on the agenda, so I would be surprised if  
 5 it wasn't. I think it had been broached before.  
 6 Q. Could I ask you now, please, to be shown  
 7 {SEA00003567/2}.  
 8 Now, this is an email from Mark Anderson to you,  
 9 Mr Kuszell, on 29 February 2012. You see that?  
 10 A. Yes.  
 11 Q. "Subject: Grenfell Tower adjacent to KALC."  
 12 A. Yes.  
 13 Q. He sets out the initial description of the project.  
 14 Now, Mark Anderson is TMO, isn't he?  
 15 A. Yes.  
 16 Q. Had you come across him before, before this email?  
 17 (Pause)  
 18 A. I cannot recall.  
 19 Q. Okay. He says:  
 20 "Good evening Andrzej  
 21 "I understand that Peter has mentioned the  
 22 generalities of our approach and desire to make use of  
 23 the services offered by Studio E.  
 24 "There is a desire, both on the part of RBKC and  
 25 KCTMO, to enhance Grenfell Tower whilst undertaking the

1 KALC project."  
 2 Then you will see underneath that he says:  
 3 "The principal objectives of the project are ..."  
 4 And there are a number of them, (a) to (i).  
 5 A. Yes.  
 6 Q. The first one is:  
 7 "To improve the public realm links around the base  
 8 of the Tower (as provided for in the SPD)."  
 9 What was the SPD?  
 10 A. It was the development plan.  
 11 Q. Right. Then at (g) you can see:  
 12 "To overlaid the Tower providing for significant  
 13 energy efficiency (including the windows)."  
 14 A. Yes.  
 15 Q. And a number of other things as well.  
 16 My question about that list: was this the first  
 17 communication that you or Studio E had had with the TMO  
 18 in respect of the Grenfell Tower project at all?  
 19 A. I couldn't be absolutely certain, but I think so. This  
 20 communication I think I received when I was on holiday,  
 21 and I recall that Bruce at that point stepped into the  
 22 discussions with the TMO.  
 23 Q. Right.  
 24 You say you were on holiday; is that a specific  
 25 recollection that you have?

1 A. Yes, because I'm a skier, so I actually was skiing at  
 2 that point in time, I think. I usually go at that time  
 3 of year.  
 4 Q. I see, okay.  
 5 It then says:  
 6 "This work will be separate to but complimenting  
 7 KALC. It must not in any way compromise the KALC  
 8 Project and we will require assurances and a clear  
 9 [delineation] demonstrating this."  
 10 What did you understand he meant by assurances?  
 11 A. I think there was a concern both in ... well, initially,  
 12 with Kensington, that they didn't want the KALC project  
 13 to suffer because we were going to dissipate resources  
 14 on something else, so I think there was a requirement on  
 15 us to provide people who would be separate to the staff  
 16 that we were using on KALC, and my understanding was  
 17 also that they would be separate contracts.  
 18 Q. Right, I see.  
 19 Now, going back to the list, (a) to (i), if we can,  
 20 you can see the first two, (a) and (b), are improving  
 21 public realm, and then (b) to rationalise the ground  
 22 floor arrangements. Then item (g) we have just seen,  
 23 overcladding.  
 24 When you got this list, did you read this list as  
 25 ranking items in order of importance?



1 A. No.  
 2 Q. The email goes on to say, just below the list , three  
 3 paragraphs below it:  
 4 "Additionally, commissions will be via KCTMO, and  
 5 subject to OJEU limits ."  
 6 Do you see that?  
 7 A. Erm ...  
 8 Q. It 's the third paragraph or line --  
 9 A. Yes.  
 10 Q. -- below the list .  
 11 A. Yes.  
 12 Q. About that, that rather suggests that it was the TMO who  
 13 wanted to use Studio E as the architect for the Grenfell  
 14 refurbishment; is that how you read it?  
 15 A. I think I understood that, notwithstanding the fact that  
 16 we had been introduced to this through Kensington, it  
 17 would be the KCTMO who would be commissioning us.  
 18 Q. Then he goes on to say at the bottom -- perhaps I should  
 19 just ask you first , before I do: "subject to OJEU  
 20 limits ", what were those limits at the time, do you  
 21 recall?  
 22 A. I wouldn't be able to quote what the limits would be,  
 23 I think that 's probably a question for KCTMO, but we  
 24 know that government agencies have to operate within  
 25 certain limits if they're going to a single entity .

1 Q. Yes. In fact, I think the limits at that time were  
 2 £174,000. Does that ring a bell with you?  
 3 A. Yeah, maybe.  
 4 Q. Then he goes on to say, just after the 1, 2, 3 stages:  
 5 "We need to rapidly conclude the initial stage and  
 6 proceed quickly with the project so that we maximise any  
 7 opportunities that may arise from joint procurement and  
 8 construction."  
 9 So did you get the impression from that that time  
 10 was of the essence, speed was needed?  
 11 A. Yes.  
 12 Q. What did you take by the phrase "opportunities that may  
 13 arise from joint procurement and construction"? What  
 14 opportunities did you understand there were from that?  
 15 A. Well, there were at least two significant opportunities.  
 16 The first would be that, by using the same contractor  
 17 and the same team -- in fact, in a way, possibly three.  
 18 By using the same contractor and the same team that had  
 19 already been preselected for the KALC project, it would  
 20 actually be a more straightforward procedure for  
 21 appointing that same team to do the tower.  
 22 The second was that there could be commercial  
 23 advantages of having a team that's already in harness,  
 24 so to speak, and particularly the contractor being  
 25 on site, that it might actually reduce cost.

1 And, thirdly, because the team and the contractor  
 2 were already operational, this would permit both the  
 3 tower and the KALC project to be completed at the same  
 4 time.  
 5 Q. So cheap, convenient, quick, even though Grenfell Tower  
 6 was a completely different kind of project with  
 7 different challenges?  
 8 A. As it proved, it wasn't cheap, because the contractor  
 9 priced higher than the budget. Convenient, yes, and  
 10 I could see why the borough would wish to see the whole  
 11 project completed in its entirety more or less at the  
 12 same time.  
 13 Q. Okay.  
 14 Now, is it right that Mark Anderson of the TMO  
 15 made -- let me ask it differently .  
 16 Did Mark Anderson of the TMO ever make any  
 17 enquiries, to your knowledge, of Studio E's relevant  
 18 skills, knowledge and experience in overcladding  
 19 existing residential high-rise buildings?  
 20 A. I don't recall that as a direct question, no.  
 21 Q. What about as an indirect question?  
 22 A. There was a comment made by somebody in the borough when  
 23 we were designing a residential part to the KALC  
 24 development, it was something like 30 units at the far  
 25 end, next to the leisure centre, and we were getting

1 a bit of stick for the design, and somebody -- and  
 2 I can't warrant who -- made a comment that, you know,  
 3 Studio E aren't exactly residential architects. So  
 4 that's kind of a very indirect comment. That's the only  
 5 one I can really recall in the sense that you're  
 6 suggesting.  
 7 Q. Was that a comment made to you?  
 8 A. It was made in -- I don't think -- it may have been made  
 9 at a planning committee, or in a large consultation,  
 10 but ...  
 11 Q. Did you respond to it?  
 12 A. I don't think it was made to me.  
 13 Q. Right. Okay.  
 14 Now, the process of appointment of Studio E to the  
 15 Grenfell Tower project was rather different from KALC.  
 16 Perhaps I can ask you this way: did the process of  
 17 appointment of Studio E to the Grenfell Tower project  
 18 require you to have any relevant skills, knowledge and  
 19 experience of overcladding an existing high-rise  
 20 residential tower block?  
 21 A. No.  
 22 Q. Did the process of appointment to the Grenfell Tower  
 23 project involve any competitive procurement, so far as  
 24 Studio E was concerned?  
 25 A. Not that I'm aware of.

1 Q. Did it involve an interview?  
 2 A. Not in the sense that I think you mean.  
 3 Q. In a procurement sense?  
 4 A. No, we weren't involved in an interview.  
 5 Q. Was there a design competition?  
 6 A. No.  
 7 Q. Was there a competence check done by the TMO on  
 8 Studio E?  
 9 A. There was a competence check undertaken by Kensington,  
 10 and how they shared that with KCTMO, I wouldn't be able  
 11 to answer.  
 12 Q. When I say competence check, I mean competence check for  
 13 the Grenfell Tower project as opposed to the KALC  
 14 project.  
 15 A. No, I appreciate what you're asking, but they were  
 16 effectively in discussions with Kensington to take the  
 17 whole team, contractor and all designers as one.  
 18 Q. As far as you recall, Mr Kuszell, what was the  
 19 competence check that RBKC did of Studio E in respect of  
 20 the Grenfell Tower project?  
 21 A. Oh, specifically Grenfell Tower, I think that -- first  
 22 of all, if I can answer this in sequence, for the KALC  
 23 project, I would struggle to recall exactly what they  
 24 asked but I do know that they would have checked our  
 25 competence. When it comes to how that might have been

1 transferred from Kensington to KCTMO, I think I'm  
 2 probably not in the best position to answer that. It  
 3 may be that my colleague Bruce Sounes who actually took  
 4 over the negotiations at that point in time may be able  
 5 to add something to this, but I can't.  
 6 Q. Right. Let me just ask it one more time so that you're  
 7 clear about what I'm asking: do you recall either RBKC  
 8 or the TMO ever doing a competence check of Studio E for  
 9 the Grenfell Tower project?  
 10 A. In my recollection, I cannot recall, but that doesn't  
 11 mean that they didn't.  
 12 Q. Okay. Does that mean that you're not able to help me  
 13 answer the question whether either RBKC or TMO ever  
 14 investigated Studio E's expertise, experience and  
 15 suitability for the Grenfell Tower project?  
 16 A. I'm saying that at that point in time when that might  
 17 have happened, I was not in the forefront of these  
 18 discussions. I do not recall.  
 19 Q. A slightly different question but similar format: did  
 20 anybody, TMO or RBKC, ever ask or investigate whether  
 21 Studio E was appropriately qualified and resourced from  
 22 a CDM point of view to carry out the Grenfell project?  
 23 A. Again, it falls into the same category as the previous  
 24 question and answer.  
 25 Q. Right.

1 Going back to, if I can, the email we looked at  
 2 a minute ago, which should be still on the screen --  
 3 A. Yeah.  
 4 Q. -- I asked you about the sentence that says, "We need  
 5 assurances". This is just after the list, if you can go  
 6 back to that.  
 7 A. Yes.  
 8 Q. You can see that there:  
 9 "This work will be separate to but complimenting  
 10 KALC."  
 11 You I think were required -- and you told me this  
 12 earlier -- to ensure that you didn't divert resources  
 13 away from the KALC project.  
 14 A. Correct.  
 15 Q. Yes. Did you understand that that meant that the  
 16 Grenfell project was in some way a lower priority than  
 17 KALC?  
 18 A. No.  
 19 Q. No?  
 20 A. Not at all.  
 21 Q. Was it a lower priority for Studio E than the KALC  
 22 project?  
 23 A. No, not at all.  
 24 Q. What was the size of the KALC team within Studio E as at  
 25 2012?

1 A. In -- in all honesty, I think that it would be very  
 2 difficult for me to answer that with any certainty,  
 3 because the team varied in size depending on the stage  
 4 it was at, but I would have expected maybe eight people  
 5 on the project.  
 6 Q. On KALC?  
 7 A. Yeah.  
 8 Q. Yes.  
 9 A. On the academy, more specifically, because there was  
 10 another firm of architects working on the leisure  
 11 centre.  
 12 Q. Right. So would that be eight out of nine or eight out  
 13 of --  
 14 A. Did you say 2012 or did you say --  
 15 Q. In 2012.  
 16 A. 2012 --  
 17 Q. Eight out of how many? Let me ask it that way.  
 18 A. Oh, gosh. We were a practice of 40-odd at that point in  
 19 time, so in terms of deploying resources, if that's  
 20 where the question is leading -- is that where you're  
 21 going with this question?  
 22 Q. I just want to know numbers. I'm trying to get a sense  
 23 of the proportion of staff, architects, that you put on  
 24 the KALC project in comparison with the proportion of  
 25 architects that you put on the Grenfell Tower project.

1 Do you see? I'm just trying to get a feel for what  
 2 those numbers are.  
 3 A. The problem with your question is that it generalises,  
 4 and the numbers of staff who work on a project vary  
 5 through the different stages. So it's much lower at the  
 6 beginning and it peaks when you're doing the detailed  
 7 technical information.  
 8 Q. Yes.  
 9 A. So KALC was, shall we say, out of sequence with  
 10 Grenfell, because Grenfell got going much later than  
 11 KALC, and so whereas the team on KALC would have been  
 12 peaking in the second half of 2012, Grenfell was still  
 13 actually at a very sort of interim planning stage.  
 14 Q. Yes.  
 15 A. Which was -- which meant that -- I can't -- I think  
 16 Bruce Sounes should answer the question specifically how  
 17 many people were working on Grenfell because I would not  
 18 wish to hazard a guess, but it was definitely the  
 19 appropriate number to do the project.  
 20 Q. What RIBA -- and do you know what I mean when I talk  
 21 about RIBA stages?  
 22 A. Yes.  
 23 Q. At what RIBA stage would you normally see a peak for  
 24 requirement of architects?  
 25 A. E/F.

1 Q. Okay. When was the E/F stage for KALC, or your part in  
 2 KALC?  
 3 A. It was in the second half of 2012.  
 4 Q. When was the E/F stage for the Grenfell Tower project?  
 5 A. We didn't get to E until the very end of 2013.  
 6 Q. Yes.  
 7 You helped us earlier on about the procurement  
 8 process that had been run for the KALC project and for  
 9 the Grenfell Tower project.  
 10 Do you accept that, had a competitive procurement  
 11 process been run for the Grenfell Tower project for  
 12 architectural services, it's unlikely that Studio E  
 13 would have qualified, given the absence of any high-rise  
 14 residential refurbishment experience?  
 15 A. I think that knowing the way procurement works with  
 16 local authorities, I think you're right.  
 17 Q. Yes.  
 18 Now, we looked at the OJEU limit a minute ago,  
 19 referred to in this letter or email in passing. On the  
 20 footing that it was £174,000 at the time -- take that  
 21 from me -- would that mean that the estimated value of  
 22 Studio E's contract for architectural services with the  
 23 TMO would have to be less than £174,000?  
 24 A. The answer is yes, but the precise figures that were  
 25 operating at the time, again, I would much prefer that

1 Bruce answered the question rather than me because I --  
 2 he was much closer to it.  
 3 Q. We will certainly do that.  
 4 Did you understand at the time -- and this is late  
 5 2012 I'm talking about -- that the fees for Studio E had  
 6 in essence been capped at the OJEU limit of £174,000?  
 7 A. I knew there was a cap.  
 8 Q. You knew there was a cap; you didn't know how much?  
 9 A. I knew there was a figure being quoted, and you have  
 10 mentioned 174,000. I can't remember the figure, but  
 11 I do remember, and I think there is correspondence in my  
 12 evidence that actually -- between myself and Bruce  
 13 indicating that the fee was low for what we were being  
 14 asked to do.  
 15 Q. We will come to that, I think.  
 16 Did you form the view at the time that KCTMO was  
 17 trying to avoid a competitive procurement process by  
 18 keeping your fees below the £174,000 cap?  
 19 A. It was certainly -- from, my understanding it was  
 20 a method to permit them to appoint not just us but  
 21 others as well to carry out the work prior to being  
 22 novated to the contractor under the selection process  
 23 that had been employed for the contractor using the IESE  
 24 framework.  
 25 Q. Now, at this stage, do you remember that the TMO was

1 planning to use the same design and build contractor for  
 2 Grenfell that it was using on the KALC project?  
 3 A. Yes.  
 4 Q. Leadbitter, yes?  
 5 A. Yes.  
 6 Q. Do you remember, why was that?  
 7 A. It was for the same reasons that I mentioned earlier,  
 8 the -- I gave you the three reasons.  
 9 Q. Right. It was those three reasons, was it? Okay.  
 10 Now, we know that Bruce Sounes emailed you the same  
 11 day, 29 February 2012. If we could please have up on  
 12 the screen {SEA00003567/1}. Here it is, an email from  
 13 him to you at 20:20:  
 14 "Andrzej  
 15 "Not sure if you have received all of the below.  
 16 Concerned about the emphasis of working at risk while  
 17 planning to OJEU it all. Doesn't add up."  
 18 Do you see that?  
 19 A. Yes.  
 20 Q. Just pausing there, do you remember in your mind whether  
 21 he was concerned about Studio E not getting paid?  
 22 A. Yes.  
 23 Q. And concerned also, perhaps, about the level of fees,  
 24 bearing in mind the OJEU limit?  
 25 A. Yes, both.

1 Q. He then says in the third paragraph:  
 2 "I feel first I need to acknowledge receipt, ask to  
 3 meet, then walk the site with him (?) to understand the  
 4 scope described probably with Neil. We are a little  
 5 green on process and technicality so I propose some  
 6 rapid CDP[sic] - MF being my first point of call. I  
 7 will hold off circulating this until we understand their  
 8 thinking on consultants."  
 9 I just want to ask you about that final paragraph.  
 10 MF, who was that a reference to?  
 11 A. Max Fordham.  
 12 Q. Now, they were the building services engineer on the  
 13 KALC project, weren't they?  
 14 A. Yes.  
 15 Q. Why would Max Fordham have been able to assist you, your  
 16 firm, in obtaining rapid CDP -- or CPD, probably --  
 17 A. CPD, it should have been.  
 18 Q. -- for the Grenfell project that was being offered?  
 19 A. I believe they had quite some track record of dealing  
 20 with refurbishment of residential buildings, including  
 21 towers.  
 22 Q. What would you have asked them?  
 23 A. What would I have asked them?  
 24 Q. Yes. What would you or Studio E have asked them when  
 25 obtaining CPD from Max Fordham?

1 A. Well, I think perhaps the better way to start the answer  
 2 to this question would be to remark what Bruce actually  
 3 meant by rapid CPD.  
 4 Q. Well, we will ask him about that. I'm asking about your  
 5 understanding as the recipient of this email.  
 6 Let me ask a different question: as at the date of  
 7 this email, late February 2012, did you feel that  
 8 Studio E really did have the relevant skills, knowledge  
 9 and experience to provide the architectural services  
 10 that the Grenfell Tower project demanded?  
 11 A. I believed that we had the processes and experience of  
 12 complex buildings to be able to undertake this  
 13 commission, and it wasn't just my belief, it was clearly  
 14 the belief of all senior members in my practice, and --  
 15 but it was clear that there would be a need for CPD and  
 16 research around the project to actually establish what  
 17 the different issues around this project might be.  
 18 So coming back to your question on Max Fordhams, the  
 19 practice always took the holistic view of how we  
 20 approached our design work. So our belief was always to  
 21 assemble a team from the earliest briefing stage on  
 22 a project, because we believed that all members of the  
 23 team have something to contribute, even at those early  
 24 stages.  
 25 So Max Fordhams, who are a firm we have worked with

1 a huge amount very successfully on lots and lots of  
 2 projects, knowing that they had a track record in  
 3 residential, it wasn't unreasonable for Bruce at the  
 4 time to email me and say, "I will start with  
 5 Max Fordhams", because he had very good connections with  
 6 them, and it wouldn't have been uniquely just going to  
 7 them, but they would have been an obvious member to  
 8 start with.  
 9 Q. Did you consider, when you got this email, or indeed at  
 10 any time after that, whether under or in accordance with  
 11 the CDM Regulations 2007 as they existed then, Studio E  
 12 was competent and adequately resourced to address the  
 13 health and safety issues likely to be involved on the  
 14 Grenfell Tower project?  
 15 A. I don't think I had a reason to doubt that we would be  
 16 able to do it. I think if something had arisen as we  
 17 progressed, then we would have reviewed it, but the  
 18 practice was doing complex projects, and I've already  
 19 answered the question that, in many instances, some of  
 20 those complex projects would have been first-time  
 21 projects.  
 22 Q. Given that Mr Sounes is saying that you're a little  
 23 green on process and technicality, my question is: why  
 24 didn't you have reason to doubt it, namely the ability  
 25 to be competent and adequately resourced to address the

1 health and safety issues that would arise?  
 2 A. I think you're -- if I understand your question, you're  
 3 saying did we think that we could actually accumulate  
 4 the knowledge to do the project properly, as we have  
 5 done on past complex projects, and there was no reason  
 6 to doubt that we couldn't do it.  
 7 Q. You say you had no reason to doubt it, but did you  
 8 actually give any specific consideration to that  
 9 question at the time?  
 10 A. Well, at the time when I received the email, as I've  
 11 already said, I was actually on holiday, but I knew that  
 12 we had put the project in the hands of one of our most  
 13 senior and experienced people, technically very sound,  
 14 and I had no reason to believe that he wasn't going to  
 15 do what he was saying he was going to do, notably to  
 16 start researching the project.  
 17 Q. Does it come to this, Mr Kuszell: you didn't actually  
 18 think about it specifically at the time, you just didn't  
 19 have any reason to think that your firm wouldn't be  
 20 competent and adequately resourced to address the  
 21 relevant health and safety issues that would arise?  
 22 A. I had no reason to believe that we wouldn't be able to  
 23 do it.  
 24 Q. Right.  
 25 Now, we know from Mr Sounes' witness statement to

1 the Inquiry that when in this email he said, "We are  
 2 a little green on process and technicality so I propose  
 3 some rapid [CPD]", he was referring to Studio E's lack  
 4 of experience in residential high-rise overcladding  
 5 projects. Now, he will be asked about that. But for  
 6 the transcript, rather than for your purposes,  
 7 Mr Kuszell, it's paragraph 64 {SEA00014273/32}.

8 I want to ask you about the word "rapid". He uses  
 9 the word "rapid" in the paragraph we're looking at. Did  
 10 you sense when you got this email that there was some  
 11 urgency to Studio E getting up to speed on how to  
 12 overclad a residential tower block?

13 A. I think when I got this email -- my hunch is that Bruce  
 14 would have written this email on the hoof, and now you  
 15 are going back on every single word in the email and I'm  
 16 not sure that your interpretation is correct.

17 Q. Well, how, doing the best you can with your  
 18 recollection, did you understand the sense of what  
 19 Mr Sounes was telling you when he said "I propose some  
 20 rapid [CPD]"?

21 A. I understood it to be exactly what he was saying, which  
 22 was that he was going to start researching the various  
 23 issues that surrounded this type of project.

24 Q. Yes. I mean, the impression that one might get from  
 25 this email is that he thought there was some urgency to

1 the matter, and my question is: did you get that  
 2 impression at the time?

3 A. I don't know about how urgent it was. I mean, the  
 4 project ... typically projects go through the RIBA  
 5 stages which you referred to earlier, and so on every  
 6 project the first step is actually agreeing the brief.  
 7 Then there is the outline stage, stage C, where initial  
 8 ideas are developed, usually rotating around the layout  
 9 issues of a building and its appearance, and information  
 10 actually builds up.

11 So, yes, there would have been an urgency to get on  
 12 with the project, and the CPD -- I keep looking at the  
 13 CDP, sorry -- would have been part and parcel of  
 14 actually moving on the project.

15 Q. Yes.

16 Can I ask you to look at paragraph 41 of your  
 17 statement, please. That's {SEA00014271/11},  
 18 paragraph 41.

19 A. 41?

20 Q. Yes. You are dealing with this email there, and you  
 21 say:

22 "With regard to Continuous Professional Development  
 23 (CPD), to which I understood Bruce to be referring in  
 24 his email of 29 February 2012, we have a CPD policy at  
 25 Studio E which comprises organised talks, internal

1 presentations, in-house training and site visits."

2 You can look at the rest if you like, but I want to  
 3 ask you about the last sentence here. You say:

4 "Given the breadth of work that Studio E had a track  
 5 record in delivering, the size of the practice, the  
 6 quality and experience of the architects and designers  
 7 it employs, I took Bruce's comments as nothing more than  
 8 prudent recognition of needing to do some Project  
 9 specific research."

10 Right. What do you mean there in your statement by  
 11 "project-specific research"?

12 A. Every project we undertake has project-specific  
 13 research. I mean, even our repeat commissions require  
 14 project-specific research. So in this case, this being  
 15 a new project to our practice, there would have been  
 16 specific legwork to do to actually research the issues  
 17 that rotated round the project.

18 Q. Would that have included looking at the regulations  
 19 which govern the construction of external walls?

20 A. It would have included going to -- initially it would  
 21 have included speaking to various parties who have had  
 22 dealings with a project of this nature, and those  
 23 discussions would inevitably steer you towards looking  
 24 at some aspects of the regulations.

25 Q. It's right, isn't it, as we've seen, that you had just

1 been approached to design the refurbishment and  
 2 overcladding of what was an existing residential  
 3 high-rise tower; yes?

4 A. Yep.

5 Q. And it's right, as you told us earlier, that your  
 6 practice had never done a commission of that kind  
 7 before; yes?

8 A. Yes.

9 Q. You personally, I think, had never done a project like  
 10 that before.

11 A. No.

12 Q. Am I right in saying Bruce Sounes, the architect who was  
 13 going to take the lead on the project, had also never  
 14 done a project like that before?

15 A. No.

16 Q. So on what basis did you think that project-specific  
 17 research, as you call it, was going to be sufficient?

18 A. Well, I think that, first of all, if it hadn't been  
 19 sufficient, I'm sure that Bruce would have come to me to  
 20 say, "Andrzej, I'm at sea here, I don't know what I'm  
 21 doing". I wasn't directly dealing with the project, so  
 22 I had no reason to believe that the research that would  
 23 be undertaken was going to lead to any other conclusion  
 24 but that we could continue with the project.

25 Q. Do you know what -- I'm using your expression --

1 project- specific research Bruce Sounes actually did?  
 2 A. I think -- I could try to summarise it for you, but it  
 3 would be second-hand knowledge, because obviously he did  
 4 the research, not me, and I think you probably ought to  
 5 direct the question to him. I know he did it, but  
 6 I don't want to fall into an error of actually quoting  
 7 things that he may or may not have done.  
 8 Q. Fair enough. But you say, as you just have, "I know he  
 9 did it"; what do you know he did? What do you remember  
 10 him having done?  
 11 A. I know that he was involved in the -- assisting KCTMO to  
 12 appoint the whole team, and I know that he was  
 13 instrumental in getting them to appoint a fire  
 14 consultant. I know that he would have been speaking to  
 15 all those consultants, most of whom actually had  
 16 experience of high-rise residential refurb-type work.  
 17 I know he talked to specialists in the field, cladding  
 18 contractors who actually had done hundreds -- well,  
 19 I don't know about hundreds, but certainly many projects  
 20 in the past.  
 21 Q. You say that you know that he talked to specialists in  
 22 the field, cladding contractors; do you know who they  
 23 were?  
 24 A. I think I -- you're asking me to answer questions which  
 25 I now know second-hand, and I think you should be

1 directing those questions to Bruce Sounes.  
 2 Q. Let me try you, if you don't know.  
 3 Do you remember which or who the cladding  
 4 contractors were that Bruce Sounes spoke to as part of  
 5 his project- specific research, Mr Kuszell?  
 6 A. I think -- we were -- the way we worked, we were all in  
 7 one studio, and Bruce would have been closer than  
 8 the Chair here. So in the general working mode, one  
 9 would hear all sorts of things, and at the moment I have  
 10 to -- I hope you will appreciate that after two and  
 11 a half years of hearing all sorts of information, your  
 12 memory can start to play tricks as to what you heard or  
 13 didn't hear at the time. Obviously I'm familiar with  
 14 the names that he did consult, but I'm not inclined to  
 15 be speaking on his behalf as to precisely who he  
 16 consulted.  
 17 Q. No, Mr Kuszell, it's not a trick question. I just  
 18 wanted to know whether you remember any specific names.  
 19 If you don't remember, you don't remember, we can ask  
 20 him.  
 21 A. I really cannot recall because it's so long ago.  
 22 Q. All right.  
 23 A. It would have been in passing, he may have even  
 24 mentioned it to me, but it would have been a  
 25 conversation rather than a written communication. At

1 least, if there was a written communication, I'm not  
 2 recalling it at this moment in time.  
 3 Q. Did you make any checks yourself to see whether  
 4 Bruce Sounes, or indeed anybody else at Studio E,  
 5 actually did carry out any project- specific research?  
 6 Did you supervise that exercise?  
 7 A. I was aware that the research was being undertaken.  
 8 I repeat: Bruce was in the same studio as me and I was  
 9 aware of the work being undertaken, but he was in charge  
 10 of the project and I had every confidence that he was  
 11 very capable of doing what he was doing.  
 12 Q. Did you take any steps to ensure that every member of  
 13 the team that you were supervising or would come to  
 14 supervise on the Grenfell Tower project had carried out  
 15 some research or had done any CPD on, for example,  
 16 cladding high-rises?  
 17 A. I was aware of people working with Bruce on the project  
 18 and therefore doing that sort of research, but I wasn't  
 19 involved in any of the detail, no.  
 20 Q. Can you identify who you were aware of as having carried  
 21 out that sort of research?  
 22 A. I could only recall people who worked on the project,  
 23 but whether -- what they specifically were doing on the  
 24 project is something you should be asking Bruce.  
 25 Q. From your knowledge, do you know whether anybody who

1 worked on the project themselves carried out any  
 2 project- specific research about how to overlaid  
 3 a residential high-rise building?  
 4 A. I know now that they were doing it, yes.  
 5 Q. Right. Do you know what they were doing, even now?  
 6 A. I think I do, but I repeat that you are asking me  
 7 questions, having acknowledged that I actually wasn't  
 8 hands-on on the project. So you're asking me to answer  
 9 things which were not in my direct knowledge. Within  
 10 a practice of the size that we were at the time, people  
 11 took control of projects, and you only were looking at  
 12 things which were drawn to your attention, and that's  
 13 how the hierarchy worked.  
 14 Q. Can I ask you -- we're moving on in time -- to look,  
 15 please, at {SEA000014272}. This is your statement.  
 16 A. Yeah.  
 17 Q. If you go to page 2 {SEA000014272/2}, we see there  
 18 an email to Bruce Sounes from you of Wednesday,  
 19 7 March 2012:  
 20 "Bruce  
 21 "I will give you a call to discuss. Happy for you  
 22 to front. I seem to remember an OJEU limit of round  
 23 £175k but maybe it has been reduced. £99k would be  
 24 problematic for the services they are proposing!"  
 25 You go on to say:

1 "We should not look at this as a poor relative but  
 2 more as an extension of the commission. I am sure that  
 3 RBKC will be looking for something that will complement  
 4 the KALC development."  
 5 Then if you go down the page on page 2, it 's  
 6 immediately below it, you get the response from  
 7 Bruce Sounes. Do you see that?  
 8 A. Yes.  
 9 Q. "Andrzej  
 10 "Brief update.  
 11 "Met Mark yesterday with Bill , Tony and someone else  
 12 from MF. Walked around and will have another walk  
 13 around next week. He thought OJEU limit was 175k, I did  
 14 a quick search and found 99k."  
 15 Then he goes on to say:  
 16 "It is definitely a project, but a poor relative  
 17 compared to KALC. He mention Hunters arriving at a  
 18 figure of £5-6m, which sounds too little ."  
 19 Then he goes on to say:  
 20 "I think you or I need to get back to Mark outlining  
 21 our take and plan of action and fee estimate.  
 22 Appleyards was discussed but only that they are not part  
 23 of our team and that costings would be needed. Left  
 24 that with Mark. He is also going to chase what drawings  
 25 he can find.

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1 "Very happy to front this . Might be cleaner and  
 2 provide a shield for Garry's gripes. Resourcing wise  
 3 I'm not sure. Markus is maybe not the right person for  
 4 sketches, massing studies and visuals .  
 5 "Highlight of the walk around was the boxing club.  
 6 See attached."  
 7 I have read that all to you because I have a number  
 8 of detailed questions on the email.  
 9 You have said in your statement -- and we can look  
 10 at it if we need to -- that if the OJEU limit was  
 11 £99,000, which it wasn't, then that would be  
 12 problematic. Do you remember saying that in your  
 13 statement? I can show it to you if you like . It 's  
 14 paragraph 44.  
 15 A. Yes, I think I recall .  
 16 Q. Right. By that, do you mean that £99,000 would not  
 17 cover all of the design work needed in advance of  
 18 putting the project out to tender for a design and build  
 19 contractor?  
 20 A. I think that was the inference, yes.  
 21 Q. Yes. Did you think that £174,000 would be sufficient to  
 22 cover that work?  
 23 A. I think we thought it would.  
 24 Q. Let me just get that right. You think you thought it  
 25 would. Does that indicate that there was some

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1 indication that you knew or thought that the budget for  
 2 the architectural services would be tight from the  
 3 outset?  
 4 A. Erm ... we were worried that -- as you saw in the  
 5 previous email, there were two issues: the first was  
 6 what the budget for the fees would be, and the second  
 7 was if we did undertake work at risk , you know, if the  
 8 project was stopped, would we lose out?  
 9 Q. Yes. Let me just ask the question again, because I'm  
 10 not quite sure you --  
 11 A. I think --  
 12 Q. Let me put it a slightly different way.  
 13 Is it fair to say that you thought that the budget  
 14 for the architectural services that you were being asked  
 15 to provide for the Grenfell Tower project would be  
 16 tight?  
 17 A. I think we were worried that the OJEU limit that would  
 18 be imposed on the KCTMO could result in us having to do  
 19 more work than the fee would cover.  
 20 Q. Did that affect your enthusiasm for the project?  
 21 A. No.  
 22 Q. Did it affect your decisions on how you would resource  
 23 the project?  
 24 A. No.  
 25 Q. Now, Mr Sounes says in the second paragraph of the email

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1 I've just shown you, "Hunters arriving at a figure of  
 2 £5-6m", which he thought was too little . Did you agree?  
 3 A. I think Bruce's comment there is probably a gut reaction  
 4 to the size of project and the value being put to it .  
 5 To quantify a figure like that, you would need to put in  
 6 quite a bit of analysis , to be accurate.  
 7 Q. Did you have any view about what you thought  
 8 a reasonable figure might be?  
 9 A. No. At that stage, no. I mean, I think this takes us  
 10 back to what I said earlier , that in a sense, when you  
 11 develop a project, you can start with a budget and then  
 12 work out what you want to do, or you could go the other  
 13 way and work out what you want to do and then try to  
 14 work out how much it costs. There's always a budget and  
 15 there's always an ambition, and striking the balance  
 16 between the two is what actually happens during those  
 17 early design stages.  
 18 Q. Mr Sounes goes on to say in the first part of the  
 19 paragraph we're on:  
 20 "It is definitely a project, but a poor relative  
 21 compared to KALC."  
 22 Is it fair to say that, from the way you understood  
 23 it, Mr Sounes was not particularly enthusiastic , at  
 24 least at this stage, about the Grenfell Tower project?  
 25 A. I don't think that reflects on Bruce's view of the

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1 project. I think it was Bruce's reflection on the  
 2 budget.  
 3 Q. I see, okay. But in comparison with the win on the KALC  
 4 project for Studio E, getting Grenfell wasn't much of  
 5 a win?  
 6 A. I don't think we would see it that way at all. I think  
 7 this is -- I would like to show some respect to the  
 8 people who suffered in this tragedy in answering this  
 9 question. For us, it was an important project.  
 10 Q. All right. Now, you then go on to say --  
 11 SIR MARTIN MOORE-BICK: Sorry, I wonder if we could scroll  
 12 up, Mr Millett, because the reference to being a poor  
 13 relative was touched on further up the page.  
 14 A. Yes, I responded to that.  
 15 SIR MARTIN MOORE-BICK: This is the message to which I think  
 16 Mr Kuszell then responded.  
 17 MR MILLETT: Yes.  
 18 A. Yes.  
 19 MR MILLETT: I'm going to come back to that in a minute.  
 20 Well, let's look at it now, since the Chairman has  
 21 raised it.  
 22 You say in your response:  
 23 "We should not look at this as a poor relative but  
 24 more as an extension of the commission."  
 25 Is that right, that in fact you saw the

1 Grenfell Tower project as really an add-on to the KALC  
 2 commission?  
 3 A. No, I wish you would stop using -- sorry to say this --  
 4 such negative language. We were very, very proud to win  
 5 the KALC commission. I know that area of Kensington.  
 6 I don't live -- I've never lived there, but I know it  
 7 very well, and we could see that this project was going  
 8 to make a huge difference to that part of Kensington,  
 9 which always looks at itself as a poor neighbour to the  
 10 south. And it included not just the buildings but a lot  
 11 of public realm which was being reinvented, and our  
 12 ambition was to make it as good as it possibly could be  
 13 within the budgets being specified by the clients. And  
 14 I have to say that the tower fitted that absolutely.  
 15 Our ambition was to actually do the best possible job on  
 16 the tower, and that is why I wrote what I wrote, because  
 17 it was an absolute firm belief that we were doing  
 18 a scheme which actually in its entirety would lift the  
 19 area.  
 20 Q. When I use the word "add-on", which I think you seem to  
 21 have taken exception to --  
 22 A. Because it makes it sound like a poor relative, and  
 23 I'm afraid I see it as a whole.  
 24 Q. Thank you very much. I just wanted to get your evidence  
 25 about what you mean as an extension of the commission.

1 The commission -- let me ask you -- you are talking  
 2 about in this email was what?  
 3 A. The original commission was to re-design the leisure  
 4 centre, design a new academy, provide some additional  
 5 residential and also to reappoint a huge area of space  
 6 that surrounded these buildings and adjoined Grenfell.  
 7 Q. Can I ask you to go back, please, to the email we were  
 8 looking at from Bruce Sounes to you, to which you were  
 9 responding. In the penultimate paragraph he says:  
 10 "Very happy to front this. Might be cleaner and  
 11 provide a shield for Garry's gripes."  
 12 Who is Garry? Is that Garry Stewart?  
 13 A. Yes.  
 14 Q. What were Garry's gripes, at that time, do you remember?  
 15 This is early 2012.  
 16 A. I think it would be better for you to ask Bruce exactly  
 17 what he meant by Garry's gripes, but there was some  
 18 friction in the practice and it may be that Bruce was  
 19 referring to that.  
 20 Q. Right.  
 21 A. But I think, in all honesty, he wrote it, you ask him.  
 22 Q. We can ask him about that. My question was directed to  
 23 what you understood by it.  
 24 A. I think I've just given you the answer. There were  
 25 frictions in the practice. When you're a practice of

1 40-odd people, you begin to get sometimes -- it's a sort  
 2 of normal part of organisations.  
 3 Q. Right. I'm sorry to press you. You received this  
 4 expression, "Garry's gripes". Did you understand what  
 5 he meant?  
 6 (Pause)  
 7 A. Looking back on it, specifically -- because you're  
 8 trying to pin me down on something which he wrote to me  
 9 eight years ago, and I cannot really recall specifically  
 10 what he had in mind, other than what I have already  
 11 answered.  
 12 Q. Right.  
 13 Now, in terms of staffing, if you look at the last  
 14 line of Mr Sounes' email, he says, just after the  
 15 reference to Garry's gripes:  
 16 "Resourcing wise I'm not sure. Markus is maybe not  
 17 the right person for sketches, massing studies and  
 18 visuals."  
 19 The Markus referred to, is that Markus Kiefer?  
 20 A. Correct.  
 21 Q. Why was Markus Kiefer not the right person for those  
 22 things, sketches, massing studies and visuals?  
 23 A. I think this is to do with -- again, I think it would be  
 24 better if you asked Bruce this question as well, but my  
 25 understanding of it would have been that Markus was not



1 so versatile in some of the 3D CAD work that one might  
 2 employ to do early design studies.  
 3 Q. Right.  
 4 Moving on, can I ask you, please, to go to  
 5 {LBI00000129}. Now, these are minutes of the residents'  
 6 forum for the KALC project --  
 7 A. Yes.  
 8 Q. -- held in the EMB Hall on 28 March 2012.  
 9 A. Mm.  
 10 Q. We can see from the list of attendees that you were  
 11 there --  
 12 A. Yes.  
 13 Q. -- for Studio E. You see that?  
 14 A. Yes.  
 15 Q. We can also see a number of other attendees, including  
 16 Laura Johnson, the head of housing; Mark Anderson from  
 17 the TMO, if we look just above your name, Mr Kuszell;  
 18 and then in the middle of the list we see  
 19 Edward Daffarn. Do we see that?  
 20 A. Yes.  
 21 Q. Do you remember that he was a resident of the tower at  
 22 the time?  
 23 A. Yes, I do.  
 24 Q. Now, if you go to the bottom of page 1 of this document,  
 25 this minute, you can see that there was item 3,

1 "Introduction to Architects". Do you see that?  
 2 A. Yes.  
 3 Q. At the very bottom, in the last bullet point on that  
 4 page, and indeed over onto the next page, you can see  
 5 that you did a presentation of the project, the scheme.  
 6 Do you see that?  
 7 A. Yes.  
 8 Q. Was that the Grenfell Tower scheme or the KALC scheme?  
 9 A. It would have been the KALC scheme.  
 10 Q. It was the KALC scheme. It looks like the KALC scheme,  
 11 because Grenfell Tower in fact, as we look later on, is  
 12 covered under "Any other business" at the end of the  
 13 meeting.  
 14 A. Yeah.  
 15 Q. If you want to look at that very quickly, if you go to  
 16 the very bottom of page 2 {LBI00000129/2}:  
 17 "9. AOB.  
 18 "Grenfell Tower."  
 19 A. Yeah.  
 20 Q. There are some questions and discussion about that,  
 21 which we will come to in a moment. I'll come back to  
 22 that.  
 23 When you go to your presentation, which we see at  
 24 the bottom of page 1 {LBI00000129/1}, if we can return  
 25 to that, please, you are recorded as having explained

1 the scheme. That's, you say, the KALC scheme.  
 2 Did you cover Studio E's experience in this  
 3 presentation? Do you remember?  
 4 A. Not that I can remember. I can barely -- I mean, if you  
 5 hadn't shown me the note, I wouldn't have remembered  
 6 specifically this meeting. So, no, I can't remember.  
 7 Q. Still on page 1, item 3, "Introduction to Architects",  
 8 you can see that in the second bullet point, ED, that's  
 9 Edward Daffarn, says or is recorded as saying:  
 10 "Concerns were raised about input of community into  
 11 design process."  
 12 A. Yes.  
 13 Q. Can you remember Mr Daffarn saying something about  
 14 concerns in that respect?  
 15 A. I can remember Eddie very well, because he was  
 16 an outspoken member of the tower, and I think he was  
 17 concerned about the level of consultation that would be  
 18 undertaken by the borough in doing the development.  
 19 Q. Do you remember him making that point at this meeting?  
 20 A. At this meeting, no.  
 21 Q. Okay. Do you remember having any concerns that the  
 22 community, as this note suggests, wasn't having input  
 23 into the design process?  
 24 A. Our instructions on the project were to only engage with  
 25 the community as and when the borough wished us to do

1 it.  
 2 Q. And did they ever, to the best of your recollection?  
 3 A. Yeah, there were community exhibitions and there were  
 4 these engagements which were held at the base of the  
 5 tower, there was a small conference room, and those  
 6 meetings were always chaired by the borough. As far as  
 7 KALC is concerned -- I'm not now going into Grenfell --  
 8 they were chaired by the borough and they were managed  
 9 by the borough.  
 10 Q. Going back to the note -- this is a context question --  
 11 do you remember whether, as this note again suggests,  
 12 Mr Daffarn was talking about concerns being raised about  
 13 community input in respect of the KALC project?  
 14 A. Yes.  
 15 Q. Yes. Going to the bottom of page 2, if we can, please,  
 16 AOB, Grenfell Tower, and then over on to page 3  
 17 {LBI00000129/3}, you will see that on the note says:  
 18 "ED [that's Edward Daffarn again]: Questioned why  
 19 Studio E chosen to do initial work."  
 20 Do you see that?  
 21 A. Yes.  
 22 Q. Do you have a recollection of Mr Daffarn raising that  
 23 question at this meeting?  
 24 A. No. I'm not saying he didn't, but I don't remember it.  
 25 Q. We can see just below the bullet point where he's

1 recorded as having asked that question,  
 2 Councillor Coleridge, that is, "Cllr C", responds and  
 3 says, or is recorded as saying:  
 4 "Very difficult to have different contractors  
 5 on site when x2 different projects going on. Synergises  
 6 across projects design need between school, leisure  
 7 centre, public realm and Grenfell Tower."  
 8 Do you remember Councillor Coleridge saying  
 9 something like that at this meeting?  
 10 A. Not specifically at this meeting, but I do know that  
 11 that expressed the sentiments that I was aware of on  
 12 behalf of the council.  
 13 Q. Very good.  
 14 Do you remember whether Mr Daffarn was satisfied  
 15 with Councillor Coleridge's response?  
 16 A. No, I don't even remember him asking the question --  
 17 sorry, giving the answer, let alone remembering the  
 18 question. I'm sorry, but I cannot recall.  
 19 Q. Do you remember ever answering yourself Mr Daffarn's  
 20 question: "Why was Studio E chosen to do initial work?"  
 21 A. No, I don't remember.  
 22 Q. Did you ever advise the TMO of Studio E's lack of  
 23 experience in that kind of project, the Grenfell Tower  
 24 project, as it was proposed at that stage?  
 25 A. I think that I was aware that they knew exactly what our

1 skillset was, so I have absolutely no doubt that they  
 2 understood the nature of the work that characterised  
 3 Studio E.  
 4 Q. Now, did you know at this stage -- and we're still very  
 5 early on -- that the Grenfell Tower project was going to  
 6 be a design and build project?  
 7 A. No. Well, actually, sorry, let's correct that. Our  
 8 understanding was that the intention for the council and  
 9 TMO was to actually employ the established contractor  
 10 for the KALC project. The way the design project team  
 11 was selected and the way the contractor was selected  
 12 were two different things. The contractor was selected  
 13 under an IESE framework independently of the design  
 14 team. The design team on KALC had been preselected via  
 15 the OJEU process. So we were basically a selected  
 16 contractor through IESE and the design team.  
 17 The intention, and indeed what the borough did, was  
 18 that as soon as KALC got planning approval, the team was  
 19 novated to the contractor. So, effectively, from that  
 20 point on, the contractor was taking full responsibility  
 21 for all the design work, even the design work which  
 22 preceded. In effect, it became from that point a design  
 23 and build contract, because he was actually undertaking  
 24 the completion of the design and doing the build.  
 25 The intention at the outset of TMO, as I understand

1 it, was that it would follow the same path, so they  
 2 would take the contractor and the design team, the  
 3 design team would work up designs and be novated to the  
 4 contractor. It would have still been a design and  
 5 build.  
 6 Q. So at this stage -- this is late March 2012 -- to the  
 7 best of your recollection, was the idea that at that  
 8 stage Leadbitter would come in and be the design and  
 9 build contractor on the Grenfell Tower part of the  
 10 project?  
 11 A. Yes, and I think that it became clear -- again, I think  
 12 I'm now speaking a little bit out of turn, because Bruce  
 13 was in the forefront of all these discussions, of  
 14 appointment and how things would happen, so I think you  
 15 will need to re-ask the same questions of Bruce. But my  
 16 understanding was that their intention was to get the  
 17 team to get it to planning and then to novate to  
 18 Leadbitter.  
 19 Q. I see.  
 20 Do you remember whether Leadbitter had any  
 21 experience of its own in the design and build of  
 22 an overcladding project on a high-rise building?  
 23 A. I don't recall what their -- I mean, I would be very  
 24 surprised if they hadn't, because they are a massive  
 25 contractor -- well, sorry, let's take a step back.

1 Leadbitter, no sooner had they become successful, were  
 2 taken over by Bouygues, and Bouygues is a huge concern,  
 3 multinational company, so, you know, I don't doubt they  
 4 would have had experience in this field, but it's not --  
 5 I can't speak on their behalf.  
 6 Q. Is it fair to say -- I don't want to put words in your  
 7 mouth -- that you didn't investigate yourself at this  
 8 stage whether --  
 9 A. No.  
 10 Q. -- Leadbitter would put a cladding specialist onto the  
 11 design and build part when they got the project?  
 12 A. No. Not to say that Bruce might have asked the  
 13 questions, but certainly I didn't.  
 14 Q. All right.  
 15 Can I turn to a different topic, which is the  
 16 selection of your team.  
 17 In general terms, Mr Kuszell, how would architects  
 18 within Studio E normally be allocated to projects?  
 19 A. It would be -- it would relate to their ability,  
 20 experience, availability.  
 21 Q. Would an architect normally work on one project at  
 22 a time or more than one project at a time?  
 23 A. More than one project at a time.  
 24 Q. How would they be expected to balance --  
 25 A. Well, actually, sorry, can I take a step back on that,

1 because you used just the general term "architect".  
 2 Q. Yes, of course.  
 3 A. I think architects within a team might find themselves  
 4 actually working solely on one project. Not always,  
 5 because projects stop and start, but more often than not  
 6 they're much more on their thing, whereas by the time  
 7 you get to an associate or a director, yes, you would be  
 8 working across more than one project.  
 9 Q. What about the support staff and assistants?  
 10 A. Well, that's what I mentioned earlier on, architects who  
 11 would be working within the team, not senior architects  
 12 or project architects or even associates.  
 13 Q. Now, we know that Bruce Sounes offered to head up the  
 14 project in his email to you we looked at earlier, "Happy  
 15 to front this". Do you remember that?  
 16 A. Yes.  
 17 Q. You have told us that he didn't have any personal  
 18 experience of overlapping an occupied residential  
 19 high-rise building.  
 20 A. Correct.  
 21 Q. Is it right that -- and, again, you tell me -- the only  
 22 Studio E staff member -- I'll use the word "employee" if  
 23 you like -- who had any experience of a project similar  
 24 to Grenfell Tower was Neil Crawford?  
 25 A. To my knowledge, yes.

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1 Q. Yes, and I think -- you say this yourself in your  
 2 statement -- he didn't join the Grenfell Tower project  
 3 until July 2014.  
 4 A. Correct.  
 5 Q. So would I be right in thinking -- and, again, please  
 6 correct me if this isn't right -- that until  
 7 Neil Crawford joined the Grenfell Tower project in  
 8 July 2014, the team of professional architects on the  
 9 Grenfell Tower project was not experienced in  
 10 overlapping a residential tower block?  
 11 A. The team working directly on the project, that's  
 12 correct, but Neil -- again, I would ask Bruce to answer  
 13 that because we were all in one studio, and I recall  
 14 an earlier piece of correspondence that you had on the  
 15 screen, you know, Bruce was even suggesting -- and  
 16 I don't know whether that happened -- taking Neil to  
 17 walk around the site when the enquiry first came our  
 18 way. So there would have been dialogue within the  
 19 studio. Bruce, Neil and I were working very closely  
 20 together as a team, so even though we were on other  
 21 projects, there was a lot of dialogue.  
 22 Q. I see.  
 23 Did Studio E have a designated person to carry out  
 24 a code evaluation before design work started on this  
 25 project?

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1 A. Code evaluation is something -- it's a terminology that  
 2 I think has come from the States. I mean, it's more to  
 3 do with buildings regs evaluation, and we would evaluate  
 4 the project at the different stages of development.  
 5 Particularly critical are the stage reports that we put  
 6 together as we go through each stage.  
 7 Q. So do I take it from that that, as a practice, at  
 8 particular RIBA stages, somebody, maybe the person in  
 9 charge of the project, would check to make sure that the  
 10 stage at which the project had reached was compliant  
 11 with, for example, the building regulations?  
 12 A. Well, I think that each party that is involved in  
 13 a project has to take some responsibility for their  
 14 spectrum of work. So one of the important factors in  
 15 the way a project develops is that stage report because  
 16 it has many contributors. So, you know, typically you  
 17 would have had sections written by obviously us, but  
 18 also by Max Fordhams and Curtins and Exova, and maybe  
 19 others.  
 20 Q. Were you involved in selecting the team that would work  
 21 on the Grenfell Tower project?  
 22 A. Within our office?  
 23 Q. Yes.  
 24 A. I was involved in selecting Bruce as the lead, and once  
 25 Bruce was selected, as you can see from the

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1 correspondence, there was discussion as to which members  
 2 of staff should actually back him up at the different  
 3 stages.  
 4 Q. Right.  
 5 Now, can I ask you to look, please, then, at  
 6 paragraph 23 of your statement. That's {SEA00014271/6}.  
 7 You say there -- this is under the rubric "Resourcing  
 8 and supervision" -- in the middle part of the paragraph:  
 9 "A commission with an approximately £1m construction  
 10 value and above would have a director or associate  
 11 director and a project architect allocated to it."  
 12 Do you see that?  
 13 A. Yes.  
 14 Q. What was Bruce Sounes' job title at the start of the  
 15 Grenfell Tower project?  
 16 A. He was an associate.  
 17 Q. Indeed, he in fact describes himself as an associate of  
 18 Studio E.  
 19 Is that the same as a director or an associate  
 20 director?  
 21 A. It's an anomaly, I think. It was used in the  
 22 statements, but basically Bruce was an associate. There  
 23 were discussions about him becoming a director, but he  
 24 was an associate.  
 25 Q. Right. Can you explain why, given the size of the

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1 Grenfell Tower project, which on any view was going to  
 2 exceed £1 million in construction value, you decided to  
 3 put Bruce Sounes on it, given that he wasn't a director  
 4 or an associate director?  
 5 A. At the time, there were three directors or three  
 6 partners in the practice and four associates, and it was  
 7 not unusual for an associate to be leading a project on  
 8 behalf of the practice.  
 9 Q. Yes. You see, in your statement, you say what you say:  
 10 "A commission with approximately £1m construction  
 11 value and above would have a director or associate  
 12 director and a project architect allocated to it."  
 13 You now, I think, tell us that it wasn't unusual for  
 14 an associate to be leading a project. Can we see if we  
 15 can work out how those two fit together.  
 16 Given the size of this project, was it unusual to  
 17 put someone who wasn't a director or associate director  
 18 on it?  
 19 A. It wasn't unusual, and can we just clarify that  
 20 associate director -- we didn't have an associate  
 21 director, we had associates. So there were directors --  
 22 or, in fact, at the time when the project was moving  
 23 forward, we didn't even have directors, we had partners.  
 24 SIR MARTIN MOORE-BICK: Can we just clarify this. At the  
 25 time, we're talking about the practice being run through

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1 an LLP; is that right?  
 2 A. Yes, so there were partners.  
 3 SIR MARTIN MOORE-BICK: A limited liability partnership.  
 4 A. Correct.  
 5 SIR MARTIN MOORE-BICK: And so there were partners.  
 6 A. Correct.  
 7 SIR MARTIN MOORE-BICK: You have just described Mr Sounes as  
 8 being an associate.  
 9 A. Correct.  
 10 SIR MARTIN MOORE-BICK: Which is presumably a recognised  
 11 status but not a partner.  
 12 A. Correct.  
 13 SIR MARTIN MOORE-BICK: So director isn't a very helpful  
 14 description.  
 15 A. No, it's not. I'm sorry. I apologise for the  
 16 inaccuracy in the statement.  
 17 SIR MARTIN MOORE-BICK: No, no, that's all right, just so we  
 18 understand it clearly, that's all.  
 19 MR MILLETT: So just going back to your statement, at the  
 20 time, when you say:  
 21 "A commission with an approximately £1m construction  
 22 value and above would have a director or associate  
 23 director and a project architect allocated to it."  
 24 What level or status within Studio E LLP are you  
 25 talking about? Partners or someone lower than

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1 a partner?  
 2 A. I think because this is written -- just to explain,  
 3 first of all, why the anomaly may have arisen. Clearly  
 4 because we're dealing with two entities, Studio E LLP  
 5 and Studio E Architects Limited, I think what's crept in  
 6 here is the wrong term for the timing that we're  
 7 describing. So there were partners and not directors,  
 8 and there were associates. What it's saying is  
 9 basically that a commission of 1 million or above, we  
 10 would normally have either a director or an associate  
 11 and a project architect allocated.  
 12 Q. I think you mean a partner or an associate.  
 13 A. Partner or associate.  
 14 Q. I see.  
 15 A. And a project architect.  
 16 Q. Who was the project architect on the Grenfell Tower  
 17 project?  
 18 A. It changed. So initially, in the first knockings, it  
 19 would have been Bruce on his own actually doing some  
 20 legwork and research, but very rapidly I think he was  
 21 joined by Markus Kiefer, and thereafter I think really  
 22 you need to speak to Bruce as to exactly what the staff  
 23 allocations were, because the project had -- it was  
 24 unfortunately a sort of stop/start project, so we got  
 25 going and then it stopped and there were, you know,

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1 planning applications submitted and they had to be  
 2 resubmitted.  
 3 So through that period there would have been  
 4 a variety of people working at the different stages.  
 5 I mean, we gave a list of all the people who were  
 6 involved in the project with some short performance ...  
 7 quite considerable.  
 8 Q. At the outset of the Grenfell Tower project, who was  
 9 the -- well, we've talked about Bruce Sounes being the  
 10 associate. Was he also the project architect allocated  
 11 to it, or are you saying that Markus Kiefer was the  
 12 project architect at that time?  
 13 A. At that early stage, Bruce Sounes would have been  
 14 effectively associate and project architect because he  
 15 was driving the project, and he would have had senior  
 16 architects to help him in the process.  
 17 Q. I see.  
 18 Now, we do know, as you have told us, and indeed you  
 19 say in your statement, that you assigned Markus Kiefer  
 20 to the project. Why did you do that, given that  
 21 Mr Sounes had told you that Markus Kiefer wasn't the  
 22 right person for the job, as we saw in the email  
 23 exchange earlier?  
 24 A. Do you know, you're asking me a question which I really  
 25 cannot recall what happened next and who in the end was

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1 deployed one way or another. One thing for sure is that  
 2 Bruce had the assistance that he needed, and if he had  
 3 a problem with assembling the people he required, he  
 4 would have come to me. And, you know, there is no  
 5 correspondence that I can actually refer to that would  
 6 remind me at the time of what exactly we were doing.  
 7 Q. Right.  
 8 Given that the project, as Mr Sounes had I think  
 9 indicated to you in the email we saw earlier, was at  
 10 least £5 million to £6 million and probably more, what  
 11 thoughts did you have about the size of team that you  
 12 needed to put on it?  
 13 A. I didn't have any concerns about the size of the team.  
 14 We had people coming free from other projects, and  
 15 a project doesn't immediately attract a large team.  
 16 I think, as I've said earlier, the peak of a team is at  
 17 stage E/F. At the very early stages of a project, you  
 18 might not have more than two people working on the  
 19 project.  
 20 Q. Can we go to an email rather later on, {SEA00008352/1}.  
 21 This is an email of 6 September 2013, so we have come  
 22 back in time a long way to September 2013, and it's  
 23 an email from Mr Sounes to you, Mr Kuszell.  
 24 A. Mm-hm.  
 25 Q. About four lines down from the start -- actually, it's

1 the end of the email, after I think talking about other  
 2 projects, it says:  
 3 "Grenfell Stage E is quite a lot of fee to earn in  
 4 a short period. I'm a little anxious about the  
 5 resource."  
 6 Do you remember receiving that email?  
 7 A. Well, yes, I mean, I remember seeing the email once we  
 8 assembled all our documentation.  
 9 Q. Yes, indeed. If you go to your witness statement, it's  
 10 {SEA00014271/19}, I would like to show you paragraph 67.  
 11 You say there:  
 12 "At the start of September 2013, Studio E was  
 13 beginning to enter the RIBA stage E of its work on the  
 14 Project. Bruce was concerned about the amount of work we  
 15 would have to do, and we started to involve other  
 16 employees in the Project including Tomas Rek."  
 17 Do you see that?  
 18 A. Yes.  
 19 Q. Was that your response to his anxieties, as he  
 20 expressed, about the resource?  
 21 A. Yes, I mean, he was doing what I would expect him to do,  
 22 which is to say that we were given a relatively short  
 23 period of time to prepare the stage E and he needed more  
 24 resource.  
 25 Q. Tomas Rek, I think, was involved between September 2013

1 and December 2013.  
 2 A. Yes.  
 3 Q. Was he a relatively junior team member or employee?  
 4 A. He wasn't the most senior of people, but he was -- he  
 5 had a few years of experience behind him and he was  
 6 a very intelligent fellow. But I have to say that,  
 7 again, I would prefer that Bruce spoke about him,  
 8 because he didn't work directly to me, and I'm probably  
 9 repeating what I've heard from others rather than  
 10 actually my own experience.  
 11 Q. Did you allocate anybody else to the project at this  
 12 stage?  
 13 A. I think there were other people working on the  
 14 project --  
 15 Q. In response to Mr Sounes' expressed anxieties?  
 16 A. Yes.  
 17 Q. Who was that?  
 18 A. Erm ... I think I would need to go back on files to  
 19 check who exactly it was. But if the intention of that  
 20 question is to suggest that we under-resourced, I think  
 21 that is not correct.  
 22 MR MILLETT: Just a few more questions, Mr Chairman, before  
 23 the break, if that's convenient.  
 24 SIR MARTIN MOORE-BICK: Yes, all right.  
 25 MR MILLETT: Mr Rek says that he was made redundant from

1 Studio E LLP in December 2013. Is that correct?  
 2 A. I think if he said that, then it must be correct.  
 3 Q. Do you remember whether that was due to Studio E LLP's  
 4 insolvency or at least the financial difficulties it was  
 5 experiencing?  
 6 A. We had ... there was a downturn on a large amount of  
 7 work, which had nothing to do with this project, and so  
 8 he was made redundant at the end of that year,  
 9 I believe, because if you had asked me the question when  
 10 he was made redundant, I wouldn't have been able to  
 11 recall that. We made a number of redundancies at the  
 12 end of the year.  
 13 Q. I was going to ask you, how many other staff were made  
 14 redundant?  
 15 A. Again, if you want the numbers, I would have to go back  
 16 on our records.  
 17 Q. Okay. Did the redundancies affect the resourcing or  
 18 available resourcing on the Grenfell Tower project?  
 19 A. No. What affected the resourcing on the Grenfell Tower  
 20 was the stop/start, because it actually -- we maintained  
 21 continuity with Bruce, but people changed, because if  
 22 you go on your records, you will find that planning  
 23 didn't go in until the end of -- we didn't get planning  
 24 until the beginning of 2014, two years after we started  
 25 the project, and there was a hiatus on the project,

1 which is never good news for us as consultants.  
 2 MR MILLETT: I understand.  
 3 Mr Chairman, is that a convenient moment? I'm going  
 4 to move on.  
 5 SIR MARTIN MOORE-BICK: Yes, you are going to something  
 6 else, are you?  
 7 MR MILLETT: A different document.  
 8 SIR MARTIN MOORE-BICK: Mr Kuszell, we're going to have  
 9 a break now so we can all get some lunch. We will  
 10 resume at 2.05, and ask you to be ready promptly for  
 11 then.  
 12 THE WITNESS: Yes.  
 13 SIR MARTIN MOORE-BICK: For now, if you would like to go  
 14 with the usher, she will look after you.  
 15 Please don't talk to anyone about your evidence or  
 16 any of the subject matter that you are being asked  
 17 about.  
 18 THE WITNESS: Yes.  
 19 SIR MARTIN MOORE-BICK: Thank you very much.  
 20 Good, 2.05, please.  
 21 (1.03 pm)  
 22 (The short adjournment)  
 23 (2.05 pm)  
 24 SIR MARTIN MOORE-BICK: Right, Mr Kuszell, I hope you got  
 25 some lunch.

1 THE WITNESS: A light lunch, thank you.  
 2 SIR MARTIN MOORE-BICK: Are you ready to carry on, anyway?  
 3 THE WITNESS: Yes.  
 4 SIR MARTIN MOORE-BICK: Good, thank you.  
 5 Yes, Mr Millett.  
 6 MR MILLETT: Mr Chairman.  
 7 Mr Kuszell, could I ask you now about the  
 8 circumstances in which Mr Neil Crawford took over from  
 9 Mr Sounes in July 2014.  
 10 If one casts one's mind back to the redundancy of  
 11 Mr Rek, and perhaps others, in the December of 2013,  
 12 does that mean that there was a seven-month gap between  
 13 Mr Rek being made redundant and Mr Crawford taking over  
 14 from Mr Sounes?  
 15 A. The first correction I would make is the term "take  
 16 over", which suggests that Bruce Sounes stopped acting  
 17 on the project, which wasn't the case.  
 18 Q. All right, fair enough, fair qualification.  
 19 A. Yeah.  
 20 Q. Before July 2014 -- and let me see if I can approach it  
 21 in stages -- we know we had Mr Sounes on the project;  
 22 yes?  
 23 A. Yes.  
 24 Q. And there were other people on it as well, including  
 25 Mr Rek.

1 A. Yes.  
 2 Q. Who else was working on the Grenfell Tower project prior  
 3 to July 2014?  
 4 A. I was -- as I responded before, there's a long list of  
 5 people who worked on the project over a period of in  
 6 excess of four years. I cannot reliably here, without  
 7 reference to the list, or even if I could refer to the  
 8 list, tell you exactly who worked on the project when.  
 9 If you want accurate questions to that, you need to ask  
 10 Bruce, who I'm sure will recall much more clearly who  
 11 was working when on the project. I can reassure you  
 12 that it wasn't just Tomas Rek and Bruce who were working  
 13 on the project.  
 14 So if I've answered that part of the question,  
 15 what's the next part of the question? Sorry to ask you  
 16 again.  
 17 Q. Let's see. When Mr Rek was made redundant in  
 18 December 2013, did anybody take over the role that  
 19 Mr Rek was playing?  
 20 A. I would like to just qualify. You are actually asking  
 21 me about a period of the project when I was not actually  
 22 directly hands-on involved in the project, okay, so that  
 23 is why I'm actually answering you with, shall we say,  
 24 a lack of the sort of clarity that you're seeking,  
 25 because there were so many people and I don't want to

1 give you a misrepresented name for this stage.  
 2 But my understanding of the project at that point in  
 3 time was it had gone out to tender, which is usually  
 4 a quieter period for us because, other than responding  
 5 to tender queries and maybe tidying up some information,  
 6 it's a period of lesser activity than one would have  
 7 immediately preceding it. So the fact that Tomas Rek  
 8 was not long on the project I don't think is the be all  
 9 and end all at that stage.  
 10 Q. Right.  
 11 As at December 2013 -- let's take a step back --  
 12 what was your role on the Grenfell Tower project?  
 13 A. My role was in the background. I mean, I had handed  
 14 over the management of the project to Bruce, and if  
 15 there was an issue that Bruce felt that I needed to be  
 16 involved in, I would get involved in it. But -- so  
 17 obviously if you raise something with me that is  
 18 somewhere in the evidence that shows that Bruce was  
 19 requiring input from me, I will answer that.  
 20 Q. Just focusing on that point in time, were you  
 21 supervising Mr Sounes' management of the Grenfell Tower  
 22 project?  
 23 A. I wasn't supervising it, I was a director available to  
 24 Bruce if he had any queries. I mean, we were working  
 25 flat out on the KALC project, and my role in the KALC

1 project was much more hands-on, and there were other  
 2 issues that I had to deal with as a director within the  
 3 practice. So the whole point of having somebody as  
 4 senior as Bruce was that he could actually manage the  
 5 project and that we had a reliable working relationship,  
 6 which had evolved over, at that point in time,  
 7 12/13 years, and I relied on him entirely to come to me  
 8 if there was an issue.

9 Q. I see. So would it follow from that that there was --  
 10 and correct me if I'm wrong here, when I try and  
 11 summarise your evidence, I'm not trying to put words in  
 12 your mouth, I just want to see if I have understood it.

13 A. Yes.

14 Q. But there was nobody at Studio E who was supervising  
 15 Mr Sounes' work on the project, but essentially you and  
 16 perhaps other partners were available as a resource as  
 17 and when he needed it; is that a fair summary of what  
 18 you have told us?

19 A. I don't know about a resource, because Bruce was leading  
 20 the project and he had resource beneath him to resource  
 21 the project as was necessary. If any issues arose,  
 22 either inside the practice or outside the practice, that  
 23 warranted me to get involved, I would get involved.

24 So I would say that if anybody in the client  
 25 organisation, for example, wanted -- had a concern

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1 about, you know, what was happening on the project, they  
 2 would come to me as the director that they knew was  
 3 associated with the project at a higher level.

4 Q. During Mr Sounes' management -- and take December 2013  
 5 as a convenient moment for the question -- was anybody  
 6 regularly looking at Mr Sounes' management of this  
 7 project and making sure that it was going well and  
 8 properly and safely?

9 A. I think that it would be one thing if Bruce was in  
 10 an entirely different office and remote from me and  
 11 others in the practice, but that wasn't the case. We  
 12 were actually in the same studio. I could actually  
 13 overhear any single conversation, and I'm sure those  
 14 people who have worked in an open studio environment,  
 15 you are aware when there is any issue arising.

16 So I think you could say that in that sense there  
 17 was constant supervision of what was going on.

18 Q. Let me ask the question a slightly different way, then:  
 19 who, if anybody, was formally Mr Sounes' line manager in  
 20 respect of the Grenfell Tower project?

21 A. If he had to come to anybody above him, he would come to  
 22 me, and then it would be effectively me and the board.

23 Q. You have answered the question --

24 SIR MARTIN MOORE-BICK: May I just -- I think really,  
 25 Mr Kuszell, the question that Mr Millett is asking you

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1 to focus on could be put in a slightly different way,  
 2 which is: did you regard yourself or anyone else as  
 3 being responsible for checking on the way that Mr Sounes  
 4 was running the project?

5 I think that's your point, isn't it, Mr Millett?

6 MR MILLETT: Yes.

7 A. The way we operate when a project is with any director  
 8 or associate in the practice is that there are moments  
 9 when project information is reviewed and there are  
 10 ISO 9001 procedures, so both at the design stage and the  
 11 technical stage, there are reviews that are held. In  
 12 a sense, they are a checkpoint. But ... yeah, does that  
 13 kind of answer the ...?

14 SIR MARTIN MOORE-BICK: I think it does. What I'm  
 15 understanding from what you're saying is that Mr Sounes  
 16 was left to run the project, but that there were these  
 17 points at which there were reviews?

18 A. Yeah, there are always back checks within the practice,  
 19 but, I mean, I have to tell you that when -- by the time  
 20 you are an architect in your sort of early to mid-40s,  
 21 you are arguably at your most experienced and most  
 22 powerful. You could argue that people who are getting  
 23 to my age are beginning to wane a little bit. So to  
 24 suggest that Bruce was in some shape or form requiring  
 25 my supervision on his daily activities I think is

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1 a travesty of the reality.

2 MR MILLETT: How many design reviews do you recall taking  
 3 place on the Grenfell Tower project?

4 A. I recall one design review which involved me and one of  
 5 my co -- at that stage, co-partners, prior to the  
 6 appraisal panel, which is the architects appraisal  
 7 panel, when we sat down to review the project. It was  
 8 quite a broad review in terms of the overall project  
 9 status, but with a focus for what was likely to arise in  
 10 front of the architects appraisal panel.

11 I'm also aware, because there is a central register  
 12 that we maintain as part of our procedure, that there  
 13 was another review held in early 2013, which was also  
 14 a design review, which I didn't attend.

15 Q. The date of the first review was when?

16 A. I think it was November 2012.

17 Q. Right.

18 A. Immediately before the appraisal panel.

19 Q. So is this right: there were two design reviews in  
 20 respect of the Grenfell project, November 2012 and early  
 21 2013? Is that right?

22 A. I think one was -- I'm pretty certain it was  
 23 November 2012 because that was when the AAP occurred,  
 24 and I think the second review was early in 2013.

25 Q. Apart from that, any other design reviews?

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1 A. No, there were two design reviews.  
 2 Q. What about a technical review, was there a technical  
 3 review?  
 4 A. There was a technical review much later.  
 5 Q. When was that, do you remember?  
 6 A. It was in October 2015.  
 7 Q. So do I take it from your evidence that, apart from the  
 8 two design reviews in November or so 2012 and early  
 9 2013, and a technical review in October 2015, Mr Sounes  
 10 was basically left to get on with it?  
 11 A. Not entirely, because you did ask about Neil Crawford  
 12 joining him, which he did in the summer of 2014.  
 13 Q. Right. So up to the summer of 2014, with that  
 14 qualification, am I right in saying that Mr Sounes was  
 15 basically left to run the project?  
 16 A. He was running the project with as many team members as  
 17 he required.  
 18 Q. Now, when Mr Crawford took over -- I say took over, when  
 19 he came into the project, let me try and use a less  
 20 provocative expression --  
 21 A. Yes.  
 22 Q. -- in July 2014, do you remember whether there was any  
 23 kind of handover process as between Mr Sounes and  
 24 Mr Crawford, from what you recall?  
 25 A. I recall that there were discussions between them, and

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1 there was no question of Bruce just stepping aside. He  
 2 was still very much engaged on the project while Neil  
 3 was, shall we say, getting a grasp of the project.  
 4 Q. Whose decision was it to bring Neil Crawford into the  
 5 Grenfell Tower project?  
 6 A. It was a joint decision between Bruce and myself. By  
 7 the summer of 2014, the Aldridge Academy was nearing  
 8 completion, and it was a question of what -- how we  
 9 would redeploy Neil, and we both thought that Neil was  
 10 the best candidate to come in to help because, first and  
 11 foremost, he actually had experience of working on  
 12 high-rise buildings with his previous practice. Second,  
 13 he actually knew the context of the project, having  
 14 worked on the Aldridge Academy, and he was coming  
 15 available. So given his experience, which was  
 16 considerable, and the nature of the project, it was  
 17 a logical decision.  
 18 Q. Did you take any steps to find out, satisfy yourself,  
 19 whether Neil Crawford had any or sufficient technical  
 20 competence to take over or take the role on such as he  
 21 had on Grenfell Tower?  
 22 A. Neil had been working within my group since he joined  
 23 the practice, and he came to our practice having been  
 24 made redundant at Fosters, but had actually been  
 25 an associate for a number of years at Foster + Partners.

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1 We were jolly lucky to get him. He was an extremely  
 2 competent individual, immediately recognised as one of  
 3 our better and more experienced people in the practice.  
 4 So he was made associate fairly quickly, and I had  
 5 absolutely no doubts that he had the ability to make  
 6 a significant contribution to the project.  
 7 Q. Let me be more specific. When you and Mr Sounes  
 8 together decided to bring Mr Crawford into the project,  
 9 did you investigate what experience Mr Crawford had in  
 10 an overcladding of an existing high-rise residential --  
 11 A. I don't think he had experience of an overcladding of  
 12 an existing building, but he definitely had high-rise  
 13 design experience on both commercial and residential  
 14 type buildings.  
 15 Q. Now, can you help me, Mr Crawford, I think, was not  
 16 an RIBA qualified architect, was he?  
 17 A. He didn't finish his part 3.  
 18 Q. No. Can you explain why Mr Crawford, who had not  
 19 finished his RIBA part 3, was allocated to the  
 20 day-to-day management of Grenfell Tower, as he was in  
 21 the summer of 2014?  
 22 A. Well, first of all, the fact that he wasn't qualified  
 23 part 3 I think doesn't reflect on his ability and skill.  
 24 As I said to you, I think I've -- you can see by the  
 25 white hair how long I have been practising. I've met

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1 a lot of architects through the years. I would rank him  
 2 in absolutely the top 5% of people I've actually worked  
 3 with. So I have absolutely no embarrassment to say that  
 4 we would have confidence in him.  
 5 However, recognising that he hadn't finished his  
 6 part 3, you know, ages ago, he was working to Bruce, and  
 7 Bruce was there in a direct supervisory position. So  
 8 just as you are asking whether I was a supervisor to  
 9 Bruce and I don't think I really was, I do think that  
 10 Bruce was a supervisor to Neil, and without putting  
 11 words in Bruce's mouth, I think the respect for Neil is  
 12 as considerable as mine.  
 13 Q. Did you specifically consider at the time whether  
 14 appointing Mr Crawford to the job that you did in the  
 15 summer of 2014 was consistent with Studio E's ISO 9001  
 16 procedures?  
 17 A. I'm not aware of any procedure offhand, without  
 18 referring to -- you know, it's a voluminous document,  
 19 but I don't think I have any reason to believe that we  
 20 couldn't have used Studio E on the project if Bruce  
 21 remained on the project.  
 22 Q. My question really is: did you think about it at the  
 23 time?  
 24 A. In all honesty, no, because our confidence in him was  
 25 really quite considerable.

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1 Q. Now, can I ask you a different set of questions about  
 2 Studio E's financial position.  
 3 We know that in August 2014 Studio E LLP was placed  
 4 into creditors' voluntary liquidation, and you have  
 5 confirmed that before.  
 6 A. Yes.  
 7 Q. Studio E Limited then took over the Grenfell Tower  
 8 project.  
 9 Was it the case that there was a limited staff  
 10 available to work on the Grenfell project after the  
 11 insolvency of LLP? Or a more limited staff, perhaps.  
 12 A. No, not really. I think we had the numbers that were  
 13 required to actually manage the project, given the fact  
 14 that the two seniors remained with us, and from  
 15 memory -- though, again I would ask Bruce to confirm  
 16 that when you speak to him -- I seem to remember we had  
 17 one other member of staff who also worked on Grenfell  
 18 prior to that.  
 19 Q. Let me try and do it this way: at the moment when  
 20 Studio E LLP went into creditors' voluntary liquidation,  
 21 how many fee-earning staff did you have?  
 22 A. Again, I would need to refer to documents, because there  
 23 had been some redundancies at the end of 2013. So if  
 24 you want an accurate answer to that, I would have to go  
 25 back to --

1 Q. Just in general terms --  
 2 A. No, sorry, I just would need to check. Either you want  
 3 a wrong answer or you want a right answer. If you want  
 4 the right answer, I really cannot tell you. I mean, we  
 5 would have probably been around about 30 at the very  
 6 least.  
 7 Q. Right. My question was really a general question: do  
 8 you remember, to the best of your recollection, whether  
 9 the staff employed by Limited after LLP went into  
 10 liquidation was smaller than the staff employed by LLP  
 11 at the moment it went into liquidation?  
 12 A. It had nothing to do with the liquidation; the issue of  
 13 how many staff we had was more to do with the character  
 14 of the work that we had to undertake.  
 15 Q. Yes, I'm just trying to get a feel, really, for a  
 16 comparison of sizes of staff. Are you able to help me  
 17 with that?  
 18 A. Yes. I think you're trying to get sizes for a project  
 19 that goes through different stages, demanding different  
 20 levels of resource. So I think it would have peaked at  
 21 the point of tender, and I'm pretty sure that it wasn't  
 22 just Tomas Rek we had working with Bruce. We did  
 23 maintain staff after that in preparation for the  
 24 construction start, and we maintained the right level of  
 25 staff for the project once it moved into 2015.

1 Q. Let me ask this question one more time, because maybe  
 2 you misunderstood it. I'm not asking about the project,  
 3 I'm asking about Studio E the practice.  
 4 A. Yes.  
 5 Q. When Studio E LLP went into liquidation, were the staff  
 6 that you had at that moment transferred over --  
 7 A. No.  
 8 Q. -- to Limited?  
 9 A. No.  
 10 Q. Right. What happened to the staff who weren't?  
 11 A. A lot were made redundant.  
 12 Q. How many?  
 13 A. Again, you're asking me specific number questions and  
 14 I really cannot recall. If I had had prior knowledge of  
 15 the question, I would have checked for you, but I cannot  
 16 tell you these numbers offhand. It was six years ago,  
 17 and it's difficult to remember such numbers.  
 18 Q. Now, the insolvency process itself, was that  
 19 time-consuming for you?  
 20 A. For me, it would have occupied a considerable amount of  
 21 my time, yes.  
 22 Q. What about Mr Sounes, did that occupy his time?  
 23 A. No, much less so. It was mainly the fate of the  
 24 partners and directors to sort it out.  
 25 Q. I see. Do we take it from that that in fact the

1 insolvency itself didn't have any adverse impact on any  
 2 particular project?  
 3 A. If you're asking whether it had an impact on Grenfell,  
 4 I don't think it did.  
 5 Q. Any other project?  
 6 A. The projects that went with us to Limited with the  
 7 agreement of the client organisations, no. In fact,  
 8 really, the truth is that they wouldn't have run with us  
 9 unless we were going to resource the project.  
 10 Q. Now, I'm going to ask you a number of questions about  
 11 ISO 9001.  
 12 A. Yes.  
 13 Q. Are you familiar with ISO 9001?  
 14 A. Yes.  
 15 Q. A quality assurance ISO.  
 16 A. Yes.  
 17 Q. Can I ask you to look, please, at paragraph 23 of your  
 18 statement. That's at {SEA00014271/6}, please. We  
 19 looked at this before. You say in the first sentence  
 20 there:  
 21 "The practice is an ISO 9001 (quality managements  
 22 system) and ISO 14001 (environmental management)  
 23 registered company. These management systems set down  
 24 procedures under which the practice operates, both for  
 25 managing the practice's operation and its project design

1 work.”  
 2 So just to be clear, the question is: at the date of  
 3 your statement, Studio E Architects Limited was,  
 4 I think, just to be clear, ISO 9001 registered?  
 5 A. Yes.  
 6 Q. Is that a standard against which any quality management  
 7 system can be measured, vis-à-vis third-party  
 8 accreditation?  
 9 A. I’m not sure I understand the question. It certainly  
 10 was the standard that we were being measured by, and  
 11 I understand that a lot of organisations will establish  
 12 an ISO 9001 system, usually using an outside agency to  
 13 help them set the system up.  
 14 Q. And a third party to accredit it?  
 15 A. Well, yes, in our case, I think, but I can’t be  
 16 absolutely certain, because it was set up in 2005,  
 17 whether we had the same people auditing us throughout,  
 18 but it was audited annually.  
 19 Q. Yes. Would it be right to describe the ISO 9001  
 20 standard or the purpose of the standard to help  
 21 organisations, whether architects or any other  
 22 organisation, to meet the needs of customers, whilst  
 23 also meeting at the same time the statutory and  
 24 regulatory requirements related to the product or  
 25 services that you supply?

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1 A. Yes.  
 2 Q. As a registered practice, is it right that Studio E  
 3 Limited would have been required to set up a quality  
 4 management system which was appropriate to its  
 5 operation?  
 6 A. If we were operating under ISO 9001 we would have  
 7 a system in place, and we do have a system in place.  
 8 Q. You say you do; did you in the period 2012 to 2016?  
 9 A. Yes.  
 10 Q. Turning to LLP, I think that was also registered, wasn’t  
 11 it?  
 12 A. Yes. When we moved from trading from Studio E  
 13 Architects Limited to LLP, effectively the system was  
 14 transferred. Obviously there had to be some  
 15 modifications, but not major. Basically, the system was  
 16 the same, and so LLP continued under the ISO 9001 and  
 17 the 14001.  
 18 Q. Right. I see. So when LLP ceased to trade, as we’ve  
 19 just discussed, was the registration then transferred  
 20 back to Studio E Limited?  
 21 A. Correct.  
 22 Q. Were you personally involved in that transfer process?  
 23 A. No. At the time, my colleague/partner/director was in  
 24 charge of co-ordinating the registration and he,  
 25 together with our office manager, notified the auditors

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1 that we were transferring back from the LLP to Studio E  
 2 Architects Limited, and then they continued to audit  
 3 Studio E Architects Limited.  
 4 Q. Who was your colleague/partner/director that you’ve just  
 5 referred to?  
 6 A. David Lloyd Jones.  
 7 Q. Okay. Did you have any involvement in that mechanical  
 8 process yourself?  
 9 A. The actual transfer at the time, I don’t think so.  
 10 I think it was mainly David at that stage. But  
 11 obviously we are all involved in 9001 somehow, so ...  
 12 Q. Do you remember when the ISO 9001 registration was  
 13 transferred back to Studio E Architects Limited?  
 14 A. We -- well, clearly the LLP suspended activities in  
 15 July 2014.  
 16 Q. Yes.  
 17 A. The system that we continued to use obviously in those  
 18 first days would have been the same system as LLP, but  
 19 it was rapidly adjusted to respect the fact that it was  
 20 back to Studio E Architects Limited. We had actually  
 21 also moved premises, so we had to adjust it for the new  
 22 premises. There were one or two other adjustments, and  
 23 then I think it was audited -- there was prior  
 24 knowledge, the auditors actually knew that we were doing  
 25 this, and then they audited us, I think, in

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1 January 2015.  
 2 Q. I see. Was there a gap in time between Studio E LLP  
 3 ceasing to trade and Studio E Architects Limited taking  
 4 back the ISO 9001?  
 5 A. No, not really. I mean, bar one person, all the other  
 6 eight had been with the practice for, at that stage, ten  
 7 or so years. Neil was a little bit shorter. And they  
 8 had been familiar with using the ISO 9001 and 14001  
 9 prior to it becoming LLP, during it being LLP and then  
 10 reverting back to Studio E Architects Limited.  
 11 So there wasn’t exactly a learning curve to  
 12 understand what the ISO 9001 required and, indeed,  
 13 you know, the way projects were set up and everything  
 14 was the same.  
 15 Q. Yes.  
 16 Now, can I just go back to something we talked about  
 17 earlier on this afternoon, and that’s internal reviews.  
 18 If you go, please, to paragraph 24 of your  
 19 statement, that’s at {SEA00014271/6}, if we could just  
 20 have that up on the screen, please, you say, and it’s  
 21 there:  
 22 “Each project at Studio E usually goes through  
 23 a number of internal reviews as part of our quality  
 24 management process, including a design review and  
 25 a technical review.”

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1 You have given us the dates of those earlier on in  
 2 your evidence. Do you mean to say here that a project  
 3 would normally go through one design review and one  
 4 technical review?  
 5 A. Yes.  
 6 Q. Ordinarily, would you have expected the Grenfell Tower  
 7 project, given its size and complexity, perhaps, to go  
 8 through more than one design review and one technical  
 9 review?  
 10 A. Well, it went through two design reviews, which  
 11 obviously also included the AAP review, and it went  
 12 through a technical review at the point when the team  
 13 working on it felt that a review was appropriate.  
 14 Q. Do you agree that, as part of a quality management  
 15 system which complies with the standards of ISO 9001,  
 16 a series of both design reviews and technical reviews  
 17 needed to be conducted throughout the course of  
 18 Studio E's involvement in the Grenfell Tower project?  
 19 A. I think the process we follow is that every project that  
 20 we do is set up on a central register, so we know  
 21 whether it's been reviewed at a given stage or not. At  
 22 the time when we got the project, we had a larger staff,  
 23 and we -- under David, there was an assistant who issued  
 24 reminders to the project teams as to whether their  
 25 projects were or weren't ready for review. But

1 ultimately the decision as to when a project should be  
 2 reviewed and whether, indeed, it needs to be reviewed  
 3 more than once will come from the team, because they  
 4 will either feel uncomfortable that, you know, it hasn't  
 5 been reviewed, and they will ask for another review if  
 6 necessary.  
 7 Q. If you go, please, to paragraph 24.2 of your  
 8 statement --  
 9 A. Yeah.  
 10 Q. -- you see, top of the page there, page 7  
 11 {SEA00014271/7}:  
 12 "A technical review usually occurs at what was  
 13 previously RIBA Stage E/F (Technical Design and  
 14 Production Information). A senior technically  
 15 experienced member of staff will review a more detailed  
 16 information pack, against a checklist covering all  
 17 aspects of a project from status of project information  
 18 through to its technical content and including such  
 19 aspects as building regulation compliance and fire  
 20 strategy."  
 21 Now, I have read that all to you so that you have  
 22 the full context.  
 23 Would you accept that it's part of the architect's  
 24 role to consider compliance with the building  
 25 regulations?

1 A. Yes.  
 2 Q. And that would be, would it, checked as part of  
 3 Studio E's internal design review?  
 4 A. Yes, it would be checked, and they would be looking not  
 5 only at their own design but also checking off such  
 6 things as whether, you know, inputs have been made by  
 7 others.  
 8 Q. Now, we know that the Grenfell Tower project was put out  
 9 to tender to potential design and build contractors in  
 10 late 2013.  
 11 A. Yeah.  
 12 Q. You remember that? That was on the basis of stage E  
 13 information. To be fair, I think Mr Sounes thinks that  
 14 it was more like stage F1.  
 15 Do you agree that, at that stage, the design work on  
 16 the project had reached at least stage E, if not  
 17 stage F1?  
 18 A. I think I would be more comfortable for you to ask that  
 19 of Bruce, because I wasn't hands-on in terms of the  
 20 exact status of the information. I think there were  
 21 different packages of information, and they would have  
 22 been at different stages of development. I'm very aware  
 23 from what Bruce and Neil, indeed, have reported to me  
 24 that there was a lot of design actually going on both by  
 25 us and by others once the contractor was appointed.

1 Q. Just focusing on this point for the moment, if Mr Sounes  
 2 is right that the design work for Grenfell had reached  
 3 stage E and probably more like stage F1, as Mr Sounes  
 4 may say, if that's right, the design work carried out by  
 5 Studio E should have been -- is this right? -- checked  
 6 internally for building regulations compliance once the  
 7 tender documents had been completed?  
 8 A. The -- again, the timing of all of this, I think you  
 9 really should ask of Bruce, but from memory we actually  
 10 produced a stage D report in the second half of 2014,  
 11 and then tender information was prepared to different  
 12 stages of development at the end of that year.  
 13 There had been reminders issued about a technical  
 14 review actually earlier in the year, but the question  
 15 was whether the project was actually ready to be  
 16 reviewed because, on the whole, you do actually want to  
 17 review the project that's going to be built as opposed  
 18 to the project that might be built.  
 19 Q. You told us earlier that there had been a design review  
 20 in November 2012 and a further design review in early  
 21 2013.  
 22 A. Yes.  
 23 Q. My question is: why wasn't a design review conducted in  
 24 late 2013 at the point at which the tender documents  
 25 were ready to go out?

1 A. The purpose of the design review is to highlight  
 2 strategic issues on a project, and the fact that there  
 3 were two reviews held over a period of, I guess,  
 4 15 months would have given the team the steers that they  
 5 required for the stage D design. If they had felt that  
 6 they wanted a further review, they would have approached  
 7 myself and asked for another review. It's not to say  
 8 that there wasn't an awareness in the practice as to  
 9 what was going on in the project during the period from  
 10 early 2013, when the second design review was held, and  
 11 when the stage D report was prepared.  
 12 Q. You say that a technical review, going back to your  
 13 statement, usually occurs at what was previously RIBA  
 14 stage E/F.  
 15 A. Yes.  
 16 Q. Technical design and product information.  
 17 If Mr Sounes is correct that that stage had been  
 18 reached by late 2013, at the time when the project was  
 19 put out to tender -- and I'm asking you to make that  
 20 assumption with me, if you would -- if that's right, can  
 21 you explain why there was no technical review at that  
 22 stage?  
 23 A. I can only discern from that that the project was still  
 24 in flux in many areas and therefore the technical review  
 25 was not held.

1 Q. Do you remember whether there was a technical review or  
 2 a design review based on the documents and drawings  
 3 which were being sent out to tender?  
 4 A. They would have been reviewed by Bruce at a senior level  
 5 to ensure that the package was correct, but it didn't at  
 6 that stage request -- or it wasn't warranting  
 7 a technical review.  
 8 Q. Does that mean that at that stage, completion of the  
 9 tender documentation and being sent out to contractors,  
 10 there was no technical review which covered building  
 11 regulations compliance and fire strategy?  
 12 A. Other than within the team itself, no.  
 13 Q. Thank you.  
 14 (Pause)  
 15 Can I ask you, then, to look, please, at a document,  
 16 {SEA00006047/3}. Now, this is an email from  
 17 David Lloyd Jones -- this is the gentleman you mentioned  
 18 earlier -- to you on 31 August. It responds to an email  
 19 from you, just a bit lower down the page, two days  
 20 before. Do you see that?  
 21 A. Yes.  
 22 Q. You say to David and Cathrin -- that's  
 23 Cathrin Beerman -- and it's copied to Bruce Sounes and,  
 24 indeed, Neil Crawford:  
 25 "We would like to schedule in a technical review

1 KALC/Grenfell next week."  
 2 Do you see that?  
 3 A. Yes.  
 4 Q. Then moving up the page, Mr Lloyd Jones comes back to  
 5 you and he says:  
 6 "Are you looking for a Design Review or Technical  
 7 Audit? We have no record of a Design Review for  
 8 KALC/Grenfell."  
 9 So at what stage had the Grenfell Tower project  
 10 reached which meant there should be a technical review?  
 11 A. I think that this was part of the reminder process that  
 12 I mentioned earlier. The assumption that KALC and  
 13 Grenfell were at the same stage in August 2012 was  
 14 incorrect because Grenfell was -- hadn't even -- at that  
 15 point, I don't think it had even gone into planning, let  
 16 alone reached a technical review stage.  
 17 Q. So can you explain why you linked the two together like  
 18 that by saying "KALC/Grenfell Technical Review"?  
 19 A. Erm ... I think that probably, in hindsight, was  
 20 a misunderstanding on my part, because it was clear to  
 21 me, from knowing where the projects were, that KALC  
 22 would have been at a stage where it could be technically  
 23 reviewed but Grenfell wasn't. It could have been  
 24 considered for a design review, which actually did occur  
 25 a little bit later.

1 Q. So are you saying that the KALC project was ripe for  
 2 a technical review --  
 3 A. Yes.  
 4 Q. -- but Grenfell wasn't?  
 5 A. Correct.  
 6 Q. Can you explain -- perhaps you can't -- what it was in  
 7 your mind that linked the two in that way?  
 8 A. Retrospectively, I can't, sorry, because it's manifestly  
 9 obvious that Grenfell was not at that developed stage.  
 10 Q. Then if you go to the next email, up to page 2  
 11 {SEA00006047/2}. "We have no record of a design  
 12 review", and it's your email back to Mr Lloyd Jones  
 13 halfway down page 2, and you say:  
 14 "David  
 15 "I think we might have a combined session, or at  
 16 least follow one closely by the other. The technical  
 17 review is particularly important at this stage. As  
 18 hands on it's Neil and myself so we could do it within  
 19 the group with Bruce."  
 20 A. That's because it's referring to KALC.  
 21 Q. Well, I was just going to ask you, but the heading, the  
 22 subject of the email, is "KALC/Grenfell Technical  
 23 Review". You are referring to KALC only there, are you?  
 24 A. I am referring to KALC only.  
 25 Q. We can see Neil is involved in it. Does that give us

1 a clue?  
 2 A. Well, Neil was involved in KALC.  
 3 Q. Exactly. So did a technical review of Grenfell Tower  
 4 take place at that stage?  
 5 A. No.  
 6 Q. Now, if you go to your statement, please, page 15,  
 7 paragraph 54 -- it's {SEA00014271/15} -- you can see at  
 8 paragraph 54 you say in the first line:  
 9 "I was involved in the design review for the Project  
 10 ... This was undertaken between me, David Lloyd Jones  
 11 and Bruce Sounes."  
 12 Then you go on to refer to an email of  
 13 7 November 2012 a little bit later on. I think we have  
 14 seen that.  
 15 What role did Mr Lloyd Jones play in the Grenfell  
 16 project?  
 17 A. He had a negligible role on the Grenfell project, but  
 18 he -- as a design review, it was actually good to have  
 19 him giving his sort of fresh eye on the project.  
 20 Q. Right. Is this the design review that you referred to  
 21 earlier? This is the Grenfell design review which you  
 22 say, I think, did take place in late 2012?  
 23 A. Correct.  
 24 Q. I see. And David Lloyd Jones' role was, what, to be  
 25 essentially an independent and objective peer reviewer?

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1 A. Yes.  
 2 Q. I see.  
 3 Let's look at the email. I think we looked at it  
 4 earlier. It's {SEA00014272/34}. It's in your exhibit.  
 5 If you go to that, the one from Bruce Sounes to  
 6 David Lloyd Jones, I think copied to you, says,  
 7 "Grenfell review". Do you see that?  
 8 A. Yes.  
 9 Q. "David,  
 10 "Have you got time tomorrow to do a design review  
 11 for Heston? Would have liked to do it today but Stage C  
 12 is dragging on while we wait for the others to forward  
 13 their material. And I'm several hours in debt to sleep  
 14 from Monday and Tuesday."  
 15 It looks as if this was a different project.  
 16 A. Heston was a different project.  
 17 Q. Can you explain how this muddle happened? The subject  
 18 is "Grenfell review" but this is about Heston.  
 19 A. I think it's a challenge beyond me. I think you  
 20 probably ought to ask that question from Bruce, because  
 21 he obviously had a design review on Heston in mind.  
 22 Q. I'm asking you because you respond to it, if you see  
 23 just above it. You say, "Yes, what time?" You didn't  
 24 say, "Which project are you talking about?"  
 25 What did you understand he was talking about? Was

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1 it the design review for Grenfell?  
 2 A. I can't remember. All I can tell you is that we  
 3 probably did hold a design review of Heston more or less  
 4 at that time, but it wasn't that much before the review  
 5 on Grenfell and the AAP.  
 6 Q. Okay. At the stage that you did, as you told us, the  
 7 design review for Grenfell in late 2012, whether or not  
 8 this email string refers to it, did you review any  
 9 technical elements of the project?  
 10 A. On Grenfell, did I review any technical elements of the  
 11 project? I ... I remember that Bruce did  
 12 a presentation. He probably was relying on material  
 13 that he had prepared to be presented to the AAP, which  
 14 would have actually shown the planning of the building,  
 15 the surrounds of the building, and studies for the  
 16 building exterior.  
 17 Q. Was any consideration given to compliance with the  
 18 building regulations at that stage?  
 19 A. This would have been a much more broader and strategic  
 20 review of the project. It wasn't getting into the  
 21 technicalities of it, no.  
 22 Q. So is the answer to my question no?  
 23 A. No.  
 24 Q. Was any consideration given to CDM compliance at that  
 25 stage?

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1 A. At that stage, if we felt that there was something which  
 2 was going to be problematic, it would be raised. So  
 3 I give you an example of the sort of issue that could  
 4 arise: we would have thought about the building  
 5 surrounds and the proposals for re-landscaping. We  
 6 would have thought about -- I think we may have talked  
 7 about the apron that was protecting people at the low  
 8 level, as to -- because there was some discussion about  
 9 omitting it, and we were anxious about that being  
 10 omitted. So the CDM dimensions would have come in in  
 11 some shape or form, yes.  
 12 Q. Can I ask you to go back to paragraph 24.1 of your  
 13 statement, which is at {SEA00014271/6}.  
 14 A. Yeah.  
 15 Q. You say there that:  
 16 "A design review usually occurs at what was  
 17 previously RIBA design stage C/D (Concept and Design  
 18 Development). The project lead presents to one or more  
 19 senior people at Studio E who will consider the proposed  
 20 design against a checklist of issues with a focus on  
 21 conceptual, aesthetic and strategic issues."  
 22 A. Yeah.  
 23 Q. I just want to ask you a question or two about that.  
 24 In the case of the Grenfell Tower project, was there  
 25 any checklist of issues with a focus on conceptual,

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1 aesthetic and strategic issues in either the design  
 2 review in November 2012 or early 2013 that you have  
 3 referred to?  
 4 A. The review in November was in the context of preparing  
 5 for the appraisal panel.  
 6 Q. Yes.  
 7 A. So we would have covered some of the headers. But  
 8 I think the review earlier in the following year would  
 9 have been against a checklist. There are checklists in  
 10 the practice manual.  
 11 Q. I see. So you're saying no for November but yes for the  
 12 early --  
 13 A. As I remember it, we sat down and went through the  
 14 project with Bruce in the context of the AAP panel.  
 15 Whether we had that checklist out in front of us at that  
 16 time, I cannot recall.  
 17 Q. Right.  
 18 Now, you referred earlier in your evidence to  
 19 a technical review in October 2015.  
 20 A. Yes.  
 21 Q. If we go to {SEA00013508}, we can see, once we get it,  
 22 that it's dated 28 October 2015. Is this what you were  
 23 referring to earlier in your evidence?  
 24 A. Yes.  
 25 Q. This is the, I suppose, note or minute of the meeting on

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1 that date, and the project title is Grenfell Tower.  
 2 Assessor: Bruce Sounes, associate. Project architect:  
 3 Neil Crawford. The technical review stage 4/5, which is  
 4 F/GHJK.  
 5 A. Yeah.  
 6 Q. Am I right in thinking that there was no equivalent set  
 7 of notes for the design reviews in either late 2012 or  
 8 early 2013 that you referred us to earlier?  
 9 A. Not that we can locate. We had a big office move in  
 10 2014, and I think a critical notebook that belonged to  
 11 Bruce Sounes actually was lost at that time.  
 12 Q. Okay.  
 13 Now, looking at this document, if we look at page 2  
 14 {SEA00013508/2}, you see it says "Design Standards".  
 15 This is at the very foot of page 2. Do you see that?  
 16 A. Yes.  
 17 Q. "Comment: Designed to current Housing, Approved Document  
 18 Building Regulations and British Standards where  
 19 applicable."  
 20 The first question is: did you see this note when it  
 21 came out, when it was produced?  
 22 A. I received a copy of this once it had been completed.  
 23 Q. I see. So your involvement in this technical review was  
 24 not the review itself but just receiving a record of it?  
 25 A. Correct.

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1 Q. I see. Let me just see how far we can go, then, with  
 2 it, because it may be for Mr Sounes himself.  
 3 If you look at the bottom of page 2, as I have  
 4 pointed out, it says "Design Standards", and you can see  
 5 what's said in the comment there.  
 6 A. Yes.  
 7 Q. Did you understand at that time that the technical  
 8 review reviewed whether the design of the Grenfell Tower  
 9 refurbishment that Studio E was involved in complied  
 10 with the approved documents under the building  
 11 regulations?  
 12 A. I would have understood that, yes.  
 13 Q. Did you investigate with Mr Sounes or Mr Crawford, who  
 14 was involved of course at this point, what they did?  
 15 A. No, I didn't -- well, put it this way: I think if -- one  
 16 of the benefits of Neil actually joining the project  
 17 with Bruce was that Neil was actually a fresh set of  
 18 eyes on the project, a fresh set of experienced eyes, so  
 19 in many ways he was actually backstopping Bruce, because  
 20 he was acquiring knowledge and questioning what was  
 21 happening on the project.  
 22 So between them, they actually carried out this  
 23 review, and I think if that note had said -- had posed  
 24 a question mark, then, yes, I would have been alerted  
 25 that there was something to infer from this. But the

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1 way it's put, I had no reason to believe that there was  
 2 an issue.  
 3 Q. Just help me with this. If you look at the document as  
 4 a whole -- and I know it's difficult for you, but if you  
 5 could be scrolled down it gently --  
 6 A. Yes.  
 7 Q. -- is this a standard format that Studio E has on its  
 8 system?  
 9 A. It is.  
 10 Q. So you would then just fill in as per appropriate for  
 11 each project?  
 12 A. Yes.  
 13 Q. Fine, okay.  
 14 Now, correct me if I'm wrong, but am I right in  
 15 thinking that if you go to page 3, under "Technical  
 16 Performance", you can see in the second from last entry:  
 17 "Fire Detailing. Comment: Completed. Action:  
 18 [blank]."  
 19 Is fire detailing the only reference or the only  
 20 place in this document we would find any review or  
 21 review report about fire performance?  
 22 A. I think from -- I think there are parallel documents  
 23 that actually give you some guidance. But I think the  
 24 important point here was that -- at least this is my  
 25 understanding -- we had a fire consultant on the

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1 project, he had set down these strategic issues that had  
 2 to be addressed and that had been completed either by us  
 3 or by others.  
 4 Q. You say that now, Mr Kuszell, but when you read this,  
 5 did you look, first of all, at this entry I'm directing  
 6 your attention to, "Fire Detailing. Comment:  
 7 Completed"?  
 8 A. I would have scanned the document, yes.  
 9 Q. Of course, and by "completed", what would you have taken  
 10 or what did you take from that?  
 11 A. That there were no issues that were outstanding on the  
 12 fire front. I mean, I know that, you know, with  
 13 hindsight now you would obviously look at it much more  
 14 carefully, but at the time there was every reason to  
 15 understand that nothing untoward had been discovered.  
 16 Q. I see. Is there anywhere else on this standard form  
 17 document that, if there were problems or issues which  
 18 were outstanding at this stage about fire safety on the  
 19 project, you would find it?  
 20 A. If you've got a comment, and you're unhappy with any  
 21 aspect of the project, you would write more than just  
 22 "Completed" in the box.  
 23 Q. So that's the box you would fill in if you had  
 24 a problem?  
 25 A. Well, to be honest, you would need to -- I can't

1 remember the whole document, but for sure that's the  
 2 fire side of things, yes.  
 3 Q. Right. All right, well, if there are any other  
 4 difficulties with that document, we can ask other  
 5 witnesses.  
 6 Can I ask you, please, to go to a document  
 7 {RYD00056956}. Bearing in mind the document I'm taking  
 8 you away from is dated 28 October 2015, the document I'm  
 9 now taking you to is a Rydon site progress report dated  
 10 October 2015.  
 11 A. Yes.  
 12 Q. Do you see that?  
 13 A. Yes, I do.  
 14 Q. Have a look at it. Is this a document you think you  
 15 would have seen at the time?  
 16 A. No.  
 17 Q. If you look at the bottom of the page in the activity  
 18 table -- you can see there is a box at the bottom that  
 19 says activity table, do you see?  
 20 A. Yes, I do.  
 21 Q. It says, "External façade works". Planned progress:  
 22 100%. Actual progress: 60%. Do you see that?  
 23 A. Yes.  
 24 Q. So would it be right to say that the technical review  
 25 that we saw which produced the report of 28 October 2015

1 was done when construction of the external façade was  
 2 already 60% complete?  
 3 A. Yes.  
 4 Q. Now, you have told us in your statement that a technical  
 5 review usually happens at RIBA stages E to F. We saw  
 6 that at paragraph 24.2 --  
 7 A. Yes.  
 8 Q. -- of your statement. Would it follow from that that  
 9 the Grenfell Tower technical review took place well  
 10 after stages E/F?  
 11 A. I don't know about well after, but I've spoken to both  
 12 Bruce and Neil since and I'm now aware that the project  
 13 was still under very serious design resolution through  
 14 the first part of 2015, so -- both by us and by others.  
 15 So the question really you ought to be asking Bruce and  
 16 Neil is at what point did they feel confident that they  
 17 were reviewing the final, final package.  
 18 Q. Well, we can ask them lots of questions, Mr Kuszell.  
 19 I'm asking you as a senior person in Studio E at the  
 20 time.  
 21 If Mr Sounes is correct that the project had reached  
 22 stage E or F1 at the point of tender, if he is correct  
 23 about that, then the Grenfell Tower technical review,  
 24 taking place as it did in October 2015, took place  
 25 a very long time afterwards; are you prepared to accept

1 that?  
 2 A. Yes, it was after -- a good -- yeah.  
 3 Q. And it was more than a year after the submission of the  
 4 full plans application to building control.  
 5 A. Yes, but that's actually -- that in itself doesn't  
 6 really mean too much because it took us two years to get  
 7 planning approval.  
 8 Q. Would it be normal for a technical review to take place  
 9 when construction of an important element of the project  
 10 was already 60% complete?  
 11 A. I think that the question of what is normal in these  
 12 circumstances is rather difficult to define. Different  
 13 projects follow different processes, and therefore the  
 14 timing and the completion of design occurs at different  
 15 stages. So I think the -- what is important is at what  
 16 point was the project -- had the project been developed  
 17 to the point where you would be reviewing the final  
 18 technical equation.  
 19 Q. I mean, do you know -- I'll help you if you don't --  
 20 that the design specification at least for the ACM, the  
 21 rainscreen, took place at latest in September 2014? Did  
 22 you know that?  
 23 A. I wouldn't have been able to give you that date.  
 24 Q. And the cavity barriers in April 2015.  
 25 A. Right.

1 Q. Did you know that?  
 2 A. Again, these are dates that would not be familiar to me.  
 3 Q. Right.  
 4 A. And of course the products that you mention and the  
 5 final detailing of those were being undertaken by  
 6 others.  
 7 Q. Let me see if you agree with me that a technical review  
 8 taking place in late October 2015, after the ACM had  
 9 been specified and the cavity barriers had been designed  
 10 many months earlier, would be happening far too late?  
 11 A. Sorry, you --  
 12 Q. A technical review that happens in October 2015, when  
 13 the ACM had been specified more than a year before, and  
 14 the cavity barriers had been specified in April that  
 15 year, was happening far too late. That's a proposition.  
 16 I'm just inviting your comment on that.  
 17 A. I'm saying that after the contractor was appointed,  
 18 a lot of things were changed and design continued under  
 19 the auspices of the specialist.  
 20 Q. Do you know of any reason why the technical review did  
 21 not happen any earlier than October 2015?  
 22 A. I think that my response earlier still stands, that  
 23 ultimately my duty at that stage would have been to  
 24 remind the team working on the project that a technical  
 25 review was due, and it was their judgement, being

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1 hands-on on the project, as to exactly when they held  
 2 the technical review.  
 3 Q. I wonder if we can just, then, in the light of that, go  
 4 back to the minutes of the technical review we were  
 5 looking at earlier on, {SEA00013508}.  
 6 A. Yeah.  
 7 Q. 28 October 2015. I showed you this when we looked at  
 8 the document, but let's just go back to it again.  
 9 The assessor, you see at the top, is Bruce Sounes,  
 10 and the project architect is Neil Crawford. Yes?  
 11 A. Yes.  
 12 Q. Given that Mr Sounes was essentially the professional at  
 13 Studio E in charge of running the Grenfell Tower  
 14 project, was Mr Sounes not marking his own homework in  
 15 conducting this technical review?  
 16 A. I think this is hard to call, really, because, as I said  
 17 to you earlier, Neil had actually joined the project in  
 18 2014 and he was the fresh eyes. But by the time we get  
 19 into 2015, actually Neil is closer to the daily workings  
 20 of the project and Bruce is the one who's actually now  
 21 checking what is actually happening during the  
 22 construction stage.  
 23 So the truth is that the review was actually carried  
 24 out between the two of them, and, in fact, that is the  
 25 only way that a review could be undertaken. Normally

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1 when we do reviews you have one party who isn't hands-on  
 2 and the other party who is hands-on. Obviously the  
 3 hands-on party actually is there to answer questions to  
 4 the party who isn't directly hands-on. These were the  
 5 two most experienced people in our practice, and they  
 6 carried out the review.  
 7 Q. Do you know why -- well, let me ask the question in  
 8 a slightly more staged way.  
 9 Would it follow from that that there was no peer  
 10 review of the technical review stage 4/5 by somebody at  
 11 Studio E who was not already involved in the detail of  
 12 the project?  
 13 A. No, that is true.  
 14 Q. Is there any reason why you, for example, or  
 15 Mr Lloyd Jones, for example, could not have been  
 16 involved or could not have conducted the technical  
 17 review?  
 18 A. Yes.  
 19 Q. What is that?  
 20 A. I think that we wouldn't have been as technically  
 21 informed as Bruce and Neil were to actually carry out  
 22 that review. So, I mean, in effect, we had Neil, who  
 23 actually worked on tall high-rise buildings, and Bruce,  
 24 who had actually done all the legwork to research the  
 25 project. They were two of our most knowledgeable

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1 people.  
 2 Q. Would you accept that, adopting that approach, that  
 3 would mean the only people who were best qualified to  
 4 carry out a technical review of the work at Studio E  
 5 were those who had carried it out?  
 6 A. Well, at different stages.  
 7 Q. So who would bring any independent eye to bear on the  
 8 work that Mr Sounes and Mr Crawford had done on the  
 9 Grenfell Tower project as at late October 2015?  
 10 A. Well, I would say that the independent eye that came to  
 11 the project was at the end of 2014, which was Neil,  
 12 because he actually was a totally fresh hand on the  
 13 project.  
 14 Q. Forgive me, Mr Kuszell, I'm going to ask the question  
 15 again, and I'll try and repeat it verbatim.  
 16 Who would bring any independent eye to bear to the  
 17 work that Mr Sounes and Mr Crawford had done on the  
 18 Grenfell Tower project as at late October 2015, when  
 19 this technical review was done?  
 20 A. I think that the events that occurred between 2014 and  
 21 2015 were summarised in the report that was produced  
 22 between the two of them. But I repeat that Neil came as  
 23 a fresh set of very experienced eyes, who didn't know  
 24 the project, so he would have actually looked at it  
 25 totally afresh. And the fact that the project then

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1 continued to evolve under his fresh eyes was, I think,  
 2 a good thing.  
 3 Q. But he wasn't very fresh, was he, by October 2015? He  
 4 had already been involved in it for 16 months.  
 5 A. He was in a good position to judge whether -- the  
 6 technical ins and outs of the project at that stage.  
 7 Q. Yes, Mr Kuszell, but not independently, I would suggest  
 8 to you.  
 9 A. Not in the sense that you mean it, yes.  
 10 Q. Thank you.  
 11 Mr Kuszell, I've come to the end of my questions,  
 12 but I have one more for you.  
 13 Looking back on the Grenfell Tower project, and  
 14 doing the best you can with your recollection and what  
 15 you know of what you have seen of the evidence, is there  
 16 anything that you would have done differently in respect  
 17 of the Grenfell Tower project?  
 18 A. Erm ... I think that the response to this shows a lot of  
 19 respect to the BSRs who suffered in this tragedy.  
 20 I would just wish to reflect -- it was the last question  
 21 that was on the list prior to this, that the technical  
 22 review, however you feel you want to interpret it, but  
 23 it didn't actually reveal anything untoward at that  
 24 stage.  
 25 Hindsight now comes into play. We've all lived two

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1 and a half years since the tragedy, and doubtless  
 2 absolutely every one of us would wish to turn the clock  
 3 back, and the truth is that, through those two and  
 4 a half years, a lot of information has come out, some of  
 5 it through our evidence, but there's also other  
 6 information that's come out through various sources.  
 7 I have to say that if we had understood that the  
 8 building regulations were not robust, if we had  
 9 understood that we can't trust a certification, if we  
 10 had understood that advice that was being given from  
 11 parties who were either specialists or marketing  
 12 products were that unreliable and misleading, this is so  
 13 sad to say, but I don't think this tragedy would have  
 14 happened, and it really cracks me up, because it  
 15 shouldn't have happened. It really shouldn't have  
 16 happened.  
 17 I'm really, really sorry for all of you and  
 18 everybody else who was involved in the project, because  
 19 I can only say to you from my heart that we really  
 20 wanted to do the absolute best project we could, and  
 21 that's why I didn't enjoy having the project described  
 22 as an add-on, because in our hearts, it wasn't an add-on  
 23 at all.  
 24 So it's horrendous, and the only thing that we can  
 25 wish for now is that actually we contribute as best we

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1 can -- we've shared absolutely everything with you -- to  
 2 finding a way forward which prevents this ever happening  
 3 again.  
 4 MR MILLETT: Mr Kuszell, I've come to the end of my  
 5 questions, but there may be, on reflection, one or two  
 6 further questions which my team might want me to ask  
 7 you. So I'm going to ask the Chairman to rise for a few  
 8 minutes.  
 9 SIR MARTIN MOORE-BICK: Would it be sensible to combine this  
 10 with the afternoon break?  
 11 MR MILLETT: Yes, it would.  
 12 SIR MARTIN MOORE-BICK: How long do you think you might need  
 13 to consider the further questions?  
 14 MR MILLETT: The length of the afternoon break, which would  
 15 normally be ten minutes, shall we say?  
 16 SIR MARTIN MOORE-BICK: I was thinking about 3.25, which is  
 17 a fraction more than ten minutes. Is that all right?  
 18 MR MILLETT: That's very convenient, thank you. We are keen  
 19 to get on to the next witness, Mr Chairman, this  
 20 afternoon, so that is convenient, yes.  
 21 SIR MARTIN MOORE-BICK: Mr Kuszell, we have found in the  
 22 past that it is necessary to have a break at the end of  
 23 a witness's evidence so that counsel can review what he  
 24 has asked the witness and consider whether there are  
 25 further questions that he needs to put. We also have

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1 a break in the middle of the afternoon in any event. So  
 2 we're going to have that break now.  
 3 I'm going to ask you to return with the usher to the  
 4 witness room. You will come back at 3.25 and then  
 5 counsel will tell us whether there are any more  
 6 questions he would like to put to you. All right?  
 7 THE WITNESS: Fair enough, yes.  
 8 SIR MARTIN MOORE-BICK: So would you like to go with the  
 9 usher, please.  
 10 Right, 3.25, please.  
 11 (3.13 pm)  
 12 (A short break)  
 13 (3.25 pm)  
 14 SIR MARTIN MOORE-BICK: Thank you, Mr Kuszell.  
 15 Now, Mr Millett, do you have some more questions?  
 16 MR MILLETT: I have one or two, Mr Chairman, in the usual  
 17 way.  
 18 SIR MARTIN MOORE-BICK: Yes.  
 19 MR MILLETT: Mr Kuszell, you said earlier in your evidence  
 20 this afternoon that there was no technical review other  
 21 than within the team itself at the tender stage. Do you  
 22 know what review was carried out within the team itself  
 23 at the tender stage?  
 24 A. At the tender stage, no package of information would go  
 25 out without actually senior eyes on it, which would

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1 normally be the associate or project architect lead.  
 2 Q. But you say normally. That --  
 3 A. Well, normally that is the policy of the practice.  
 4 Q. Yes.  
 5 A. We -- as a practice, we have always had a large bank of  
 6 senior people in the practice. To become an associate  
 7 isn't a decision that's taken lightly in the practice.  
 8 Effectively, you're putting your trust into somebody at  
 9 a very senior level to undertake the work, so they would  
 10 be proven all-rounders.  
 11 Project architects, similarly, are not entrusted in  
 12 our practice to take a lead on the project unless we  
 13 believe they have shown enough work experience,  
 14 preferably under our auspices, and that we understand  
 15 from that experience that they can actually take the  
 16 project lead for the type of or scale of a project that  
 17 is required.  
 18 Q. Mr Kuszell, I'll ask the question again, because I'm not  
 19 confident you have answered it.  
 20 In the case of the Grenfell Tower tender, do you  
 21 know whether a team review was carried out --  
 22 a technical review was carried out --  
 23 A. A technical review in the sense that you're asking was  
 24 not carried out at that stage, it was carried out later,  
 25 but a review of the package that was going out to tender

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1 would have been reviewed by Bruce and maybe a colleague.  
 2 Of that I can't be sure, you would need to ask him.  
 3 Q. Do you accept that more frequent technical reviews  
 4 should have happened on the Grenfell Tower project than  
 5 in fact happened?  
 6 A. Erm ... The reason I'm hesitating is that when you have  
 7 a project that gets its full technical resolution in  
 8 such a graded way, it's a fine judgement when you call  
 9 the technical review. In hindsight, you could argue  
 10 that maybe a technical review could have been held at  
 11 the tender stage, but it would have been in the  
 12 knowledge that you would have to do a further technical  
 13 review because a lot would change or, indeed, even some  
 14 areas have not been fully resolved.  
 15 Q. There would be no difficulty, would there, in having  
 16 a technical review more than once?  
 17 A. No, you could have a number of technical reviews.  
 18 MR MILLETT: Mr Kuszell, thank you very much.  
 19 Mr Chairman, I have no further questions for this  
 20 witness.  
 21 Mr Kuszell, it only remains for me to say thank you  
 22 very much for coming and giving evidence to the Inquiry  
 23 today.  
 24 THE WITNESS: I have been glad to be of assistance.  
 25 SIR MARTIN MOORE-BICK: We are certainly very grateful to

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1 you for coming to give your evidence. It's all over now  
 2 and you're free to go.  
 3 THE WITNESS: Thank you. I am going to actually stay.  
 4 SIR MARTIN MOORE-BICK: You are welcome to stay if you want,  
 5 of course.  
 6 THE WITNESS: Thank you very much.  
 7 (The witness withdrew)  
 8 MR MILLETT: Mr Chairman, we're now going to have some  
 9 movement on counsels' bench. Ms Grange is going to take  
 10 the next witness, which means I'm going to step away  
 11 from the podium for a moment.  
 12 SIR MARTIN MOORE-BICK: Do you need us to rise for a moment?  
 13 MR MILLETT: It is a matter for you, Mr Chairman. It would  
 14 probably be more convenient if you did because there are  
 15 some electronics that have to be moved around. If it is  
 16 not inconvenient, would you mind?  
 17 SIR MARTIN MOORE-BICK: We will rise for a moment, but can  
 18 we keep it as short as possible.  
 19 MR MILLETT: Two minutes. Absolutely.  
 20 (3.30 pm)  
 21 (A short break)  
 22 (3.32 pm)  
 23 SIR MARTIN MOORE-BICK: Yes, Ms Grange.  
 24 MS GRANGE: Yes, Mr Chairman. We are now going to call our  
 25 second Studio E witness. That's Mr Bruce Sounes. If he

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1 could be brought in.  
 2 SIR MARTIN MOORE-BICK: Yes, would you ask Mr Sounes to be  
 3 brought in, please.  
 4 MR BRUCE SOUNES (affirmed)  
 5 SIR MARTIN MOORE-BICK: Thank you very much, Mr Sounes, sit  
 6 down, make yourself comfortable.  
 7 Yes, Ms Grange.  
 8 Questions by COUNSEL TO THE INQUIRY  
 9 MS GRANGE: Can you please give the Inquiry your full name?  
 10 A. It's Bruce Alexander Sounes.  
 11 Q. Thank you. Thank you very much for coming to give  
 12 evidence today and to assist the Inquiry with its  
 13 investigations. I'm going to be asking you questions  
 14 today and for the next few days. If you have any  
 15 difficulty understanding anything I'm saying, please ask  
 16 me to repeat the question or put it in a different way.  
 17 Is that okay?  
 18 Can you please keep your voice up so the  
 19 transcribers can hear you for the transcript.  
 20 Now, you have made a lengthy witness statement for  
 21 the Inquiry. That should be in a folder in front of you  
 22 on your desk. Can you open that up. If we can take the  
 23 screens to it, it's {SEA00014273}, if we could bring  
 24 that up. Thank you.  
 25 We see your name there, and if we could go to the

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1 very last page of the statement at page 187  
 2 {SEA00014273/187}, we can see your signature, and it's  
 3 dated 9 November 2018; is that correct?  
 4 A. Yes.  
 5 Q. You have also provided exhibit BS/1, which we don't need  
 6 to bring up, but it's at {SEA00014274}.  
 7 Now, have you read your statement recently?  
 8 A. Yes.  
 9 Q. Can you confirm that the contents of it are true?  
 10 A. Yes, I can.  
 11 Q. Have you discussed your evidence with anyone before  
 12 coming here today?  
 13 A. Yes -- well, yes.  
 14 Q. Can you explain in what context you have had those  
 15 discussions?  
 16 A. Mainly with our legal advisers.  
 17 Q. We don't need to go into those. With anybody else?  
 18 A. With my colleagues, but not really the statement itself.  
 19 Q. Not about the statement itself? Okay.  
 20 So I'm going to start by asking some questions about  
 21 your qualifications and your experience. You have set  
 22 out your experience at paragraph 17 of your witness  
 23 statement, and I would like to go to that. That's  
 24 {SEA00014273/7}.  
 25 So if we can just look at that, you say you have

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1 worked at Studio E since 2000 and you were made  
 2 an associate of the practice in 2005. Then you say:  
 3 "My early experience at Studio E involved a range of  
 4 educational and sports and leisure projects."  
 5 Then you say further details are set out in your CV.  
 6 We will come to your CV in just a moment.  
 7 Focusing for a moment on the second sentence of  
 8 that, when you say that your early experience at  
 9 Studio E involved educational and sports and leisure  
 10 projects, do you mean before the Grenfell Tower project?  
 11 What do you mean there by your early experience?  
 12 A. These are my experiences at Studio E from 2000.  
 13 Q. So all your experience from 2000 onwards, prior to  
 14 Grenfell, was that in education and sports and leisure  
 15 projects?  
 16 A. I think there was some diversity there, but  
 17 predominantly, yes.  
 18 Q. Diversity over what kind of projects?  
 19 A. I'm trying to remember. We did some work abroad, 2010.  
 20 Q. Would it be fair to say that educational and sports and  
 21 leisure projects were your main area of work at  
 22 Studio E?  
 23 A. Yes.  
 24 Q. Can we go, then, to your CV. We find that at  
 25 {SEA00014274/2}. If we can look at the top half of the

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1 screen. Thank you.  
 2 There it says at the very top that you have  
 3 a PGDip BArch. Does that mean you have completed  
 4 parts 1 and 2 of the architect qualification?  
 5 A. I graduated in Durban, South Africa, and on moving to  
 6 the UK, to do part 3 I had to get my qualification  
 7 accredited by the ARB. So, yes, they were accredited as  
 8 part 2 equivalent.  
 9 Q. I see, yes.  
 10 You are a registered architect. Does that mean you  
 11 have completed -- I think you have just said this --  
 12 part 3 of the architects qualification?  
 13 A. Yes.  
 14 Q. You have completed that.  
 15 Now, your CV doesn't state where and when you  
 16 trained as an architect but I think you may have just  
 17 alluded to that. Where did you undertake your  
 18 architecture training?  
 19 A. It was the University of Natal, Durban.  
 20 Q. When was that? When did you undertake that training?  
 21 A. My first year was 1989 and my final year was 1994.  
 22 Q. Were you a member of RIBA between 2012 and 2016 when you  
 23 were working on the Grenfell project?  
 24 A. No.  
 25 Q. Were you a member of any other professional associations

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1 or bodies at this time relevant to your work?  
 2 A. Just the ARB.  
 3 Q. Just the ARB?  
 4 A. Yeah.  
 5 Q. Now, we can see from your CV there on the left that  
 6 before you worked at Studio E you worked at  
 7 an organisation called Arcotek between 1995 and 1998.  
 8 Did you work for them as an architect?  
 9 A. Yes. I'm hesitating because here, of course, it's  
 10 a protected term, and I seem to recall it's a protected  
 11 term there as well, but I did get the equivalent  
 12 qualification, but I can't remember when, so ...  
 13 Q. Where is "there", in South Africa?  
 14 A. Yes.  
 15 Q. So you worked for Arcotek in South Africa?  
 16 A. Yes.  
 17 Q. Then we have also got here KSR Architects between 1998  
 18 and 2000. Where was that?  
 19 A. In Camden, in London.  
 20 Q. So did you begin working in the UK from 1998 onwards?  
 21 A. Yes.  
 22 Q. Again, KSR Architects, were you working as an architect  
 23 in that firm?  
 24 A. The term that was used is architectural assistant before  
 25 you've got your part 3. I got my part 3 towards the end

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1 of my time at KSR.  
 2 Q. So sometime before 2000 you got your part 3, did you?  
 3 A. I think it was between 1999 and 2000, yes.  
 4 Q. Before we come on to that, what kind of projects did you  
 5 work on at those companies?  
 6 A. Erm --  
 7 Q. So this would be Arcotek and KSR Architects.  
 8 A. Arcotek was primarily a refurbishment of a Victorian  
 9 building that had been converted in the previous century  
 10 into a Post Office. It was a large -- it was  
 11 a protected heritage building which the Post Office who  
 12 occupied it were making large changes and I was involved  
 13 in that for three years.  
 14 Q. Did you just work on that one project during that time?  
 15 A. Primarily.  
 16 Q. Yes.  
 17 A. Yeah.  
 18 Q. At KSR Architects in Camden, what kind of projects did  
 19 you work on there?  
 20 A. I think the bulk of my time there was working on  
 21 a residential or a hotel -- actually, I think aparthotel  
 22 is the term, for quite a big building in St Paul's  
 23 Churchyard, which was new-build, but it was essentially  
 24 recreating the mass of the historic buildings.  
 25 Q. Yes.

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1 A. Plus I did work on a leisure centre towards the end of  
 2 my time there.  
 3 Q. Okay. We know that you have worked at Studio E since  
 4 2000, so had you completed your part 3 before you joined  
 5 Studio E, or did you complete it after that?  
 6 A. I think they more or less coincide. I can't be 100%  
 7 sure, but I think I started Studio E as a registered  
 8 architect, or it would have been virtually simultaneous.  
 9 Q. Thank you.  
 10 When you were first hired, did you work for  
 11 Studio E LLP or did you work for Studio E Architects  
 12 Limited?  
 13 A. It was Limited.  
 14 Q. In what capacity did you first start working for them?  
 15 A. As an architect.  
 16 Q. You were made an associate, your statement says, in  
 17 2005; is that correct?  
 18 A. Yes.  
 19 Q. Can you explain in your own words, how senior is  
 20 an associate position within Studio E?  
 21 A. I think I've mentioned the assistant. Below  
 22 an assistant you would have -- sorry, I'm just giving  
 23 you a sense of hierarchy. Below an assistant you would  
 24 have a student. Then you would have the project --  
 25 an architect, someone who has achieved part 3 and

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1 registered. They can be called an architect. A project  
 2 architect is someone who's been given the role of  
 3 fronting up a project. A senior architect may be  
 4 a project architect or they may not be, they might move  
 5 between projects. And an associate sits one above them,  
 6 and it's rather just a designation, it doesn't ...  
 7 Q. Yes.  
 8 A. I mean, it doesn't -- is that --  
 9 Q. Yeah.  
 10 A. Above them, of course, is a director.  
 11 Q. So it's one -- director or partner. Would you have  
 12 referred to them while it was an LLP as a partner or  
 13 a director?  
 14 A. No, no, a partner is a member of the LLP, but I was --  
 15 Q. You were not?  
 16 A. Well, I don't know if you will come on to that, but  
 17 I was erroneously registered as a partner of the LLP for  
 18 a few months.  
 19 Q. But you never were?  
 20 A. No.  
 21 Q. Have you heard of the phrase associate director? The  
 22 way you just described it sounded like it was  
 23 an associate and then it went straight to director.  
 24 Have you heard of the phrase associate director?  
 25 A. I have, yes. Not one I would have used myself.

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1 Q. And it wasn't someone in your position? Did you ever  
 2 perform the role of associate director?  
 3 A. I don't know what that is, sorry.  
 4 Q. No. Would an associate normally fulfil the role of  
 5 a project architect on a project?  
 6 A. Not necessarily, no.  
 7 Q. So who might be the project architect, somebody beneath  
 8 the associate level?  
 9 A. I wouldn't want to put any restriction to who could be  
 10 a project architect. I think an associate can be  
 11 a project architect.  
 12 Q. But presumably -- I mean, we looked at the hierarchy  
 13 a moment ago -- you wouldn't have a student as your  
 14 project architect, so at what level would a project  
 15 architect come in?  
 16 A. Anyone who has qualified, fully qualified.  
 17 Q. And what do you mean by fully qualified?  
 18 A. Completed their part 3 and have been registered.  
 19 Q. So a project architect would be someone that's completed  
 20 their part 3?  
 21 A. Yeah. I mean, you ...  
 22 Q. Now, you have also given some details of your previous  
 23 experience elsewhere in your witness statement. I just  
 24 want to take you to a couple of key passages. If we can  
 25 look at paragraph 271 of your statement,

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1 {SEA00014273/114}.  
 2 So in paragraph 271, it's about eight lines down, in  
 3 a sentence in the middle of the page which begins:  
 4 "When I met Harley ..."  
 5 If we can just read that together:  
 6 "When I met Harley I believe I had a lingering  
 7 uncertainty about PIR because this was a high-rise and I  
 8 had not been involved in a high-rise before."  
 9 Do you see that?  
 10 A. Yes.  
 11 Q. We are going to come back to Harley and PIR much later,  
 12 but I just want to focus on the last part that you say  
 13 there.  
 14 Is it right that you had not done a high-rise  
 15 residential project before Grenfell?  
 16 A. No. No.  
 17 Q. Would it also be fair to say that you were not familiar  
 18 with modern cladding materials prior to working on the  
 19 Grenfell project?  
 20 A. Erm ...  
 21 Q. Would you say you were --  
 22 A. I think all the products that we investigated I was  
 23 familiar with.  
 24 Q. So all the products that were investigated you were  
 25 familiar with?

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1 A. I think so, yes.  
 2 Q. Can we look at something you say about this in your  
 3 statement. If we go to paragraph 277 on page 116  
 4 {SEA0001473/116} of your statement, if we look in the  
 5 very last lines of that paragraph, you say there,  
 6 picking it up halfway through:  
 7 "... although at the time I would not have spent  
 8 time analysing the datasheet and I had no experience  
 9 with PE composites."  
 10 So is it right that before the Grenfell project you  
 11 hadn't come across PE composites?  
 12 A. No; I had.  
 13 Q. But you're saying you had come across other products  
 14 that were used on the Grenfell exterior?  
 15 A. No experience at Studio E or for that matter in my  
 16 working experience. I hadn't come across the aluminium  
 17 composite material in my professional experience.  
 18 I had, however, come across it as a student.  
 19 Q. As a student, I see. Okay.  
 20 A. That is somewhere in my statement.  
 21 Q. Had you been involved in an overcladding project before  
 22 the Grenfell project?  
 23 A. In other words, a building that has been overclad, yes.  
 24 Q. Can you remember which project that might have been?  
 25 A. We refurbished and extended the Watford Woodside Leisure

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1 Centre, which was finished in 2008, which used  
 2 a combination of composite Kingspan panels and  
 3 an insulated render.  
 4 Q. Was that your only experience of overcladding before the  
 5 Grenfell project?  
 6 A. Offhand, that's the one that comes to mind, the most  
 7 recent, yes. I can't think of any others.  
 8 Q. You can't think of any others, no.  
 9 Can we now move to the topic of continuing  
 10 professional development.  
 11 Is it right that, as a registered architect, you're  
 12 required to undertake continuing professional  
 13 development?  
 14 A. I'd be honest, I thought the requirements for CPD fell  
 15 to RIBA members. I think you might correct me on that,  
 16 but that was my understanding.  
 17 Q. So your understanding is it's RIBA members that have to  
 18 do the CPD?  
 19 A. Well, obliged to under the terms of their membership,  
 20 yeah.  
 21 Q. As a registered architect with the ARB, was your  
 22 understanding that you had to do any CPD?  
 23 A. I'm not sure. I wasn't sure.  
 24 Q. So I was about to ask you how many hours or points of  
 25 CPD per year you were required to do. You don't know?

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1 A. No.  
 2 Q. Were you required to carry out CPD as an associate of  
 3 Studio E? Did they require you to carry out CPD  
 4 activities?  
 5 A. No, I don't think I -- it was ever expressed or ... no.  
 6 Q. So did you actually carry out -- let's take the years  
 7 2012 to 2016 -- any CPD activities during that time?  
 8 A. CPD was organised by the office as the lunchtime  
 9 seminars, which I think is quite common, and I certainly  
 10 attended many of those.  
 11 Q. We're going to come on to those in a minute, because we  
 12 have some details of those from Studio E. But apart  
 13 from those lunchtime seminars that were organised by  
 14 Studio E, did you do any other kind of continuing  
 15 professional development, any other training, seminars,  
 16 courses?  
 17 A. I can't think of anything offhand.  
 18 Q. Okay.  
 19 So Studio E's solicitors have disclosed a list of  
 20 seminars that were organised, and we have that for the  
 21 years 2011 to 2013, 2016 and 2017. The Inquiry's been  
 22 told by Studio E's solicitors that no training seminars  
 23 were organised in 2014 and 2015.  
 24 Now, does that reflect your understanding, thinking  
 25 back?

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1 A. I can't disagree, yeah, that sounds ...  
 2 Q. Can you recall the fact there were no seminars at all  
 3 during 2014 and 2015?  
 4 A. I don't -- 2015?  
 5 Q. Yes.  
 6 A. I don't recall. I think 2014, I can believe that. But  
 7 I thought we restarted them sooner than ...  
 8 Q. Okay. Let's see what we can look at to help your  
 9 memory. So I'm going to show you a list of those  
 10 seminars. Can we go first to {SEA00014424}. This is,  
 11 as we can see from the title of the document, CPD  
 12 seminars list for 2010. If you just cast your eye down,  
 13 we see the provider on the left-hand side, and  
 14 a description in the middle of the CPD activities .  
 15 A. Yeah.  
 16 Q. Now, do you agree, just looking at the titles of those,  
 17 there aren't any seminars there that would have been  
 18 relevant to either overcladding work or fire safety? Do  
 19 you agree?  
 20 A. Yeah. I do.  
 21 Q. If we move on to the next list from 2011, that's at  
 22 {SEA00014427}, we see these are the seminars for 2011,  
 23 and there is a seminar there three lines down called  
 24 "Fire Safety Management and BS9999". We see that on  
 25 7 September between 1.00 and 2.00 pm, so it's

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1 an hour-long seminar.  
 2 Can you remember who gave this seminar?  
 3 A. No.  
 4 Q. It says here that the CPD provider is called Kingfell .  
 5 Do you know of an organisation called Kingfell?  
 6 A. No.  
 7 Q. Is it possible that could be a typo for Kingspan? Do  
 8 you recall attending a seminar that Kingspan were  
 9 involved in?  
 10 A. Erm ... no.  
 11 Q. No. Did you actually attend this seminar?  
 12 A. I don't recall attending it, no.  
 13 Q. No?  
 14 A. No.  
 15 Q. So you can't illuminate us on anything about the  
 16 contents of that seminar?  
 17 A. No.  
 18 Q. Okay. Let's look at the next one for 2012. This is  
 19 {SEA00014423}. Thank you. I'll just give you a moment  
 20 just to look down those seminars.  
 21 Now, we can see, three up from the bottom, that  
 22 there is a seminar called "Using Celotex to Meet Part L  
 23 2010". Can you see that?  
 24 A. Yeah.  
 25 Q. Next to "Celotex", 12 September between 1.00 and

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1 2.00 pm. Can you recall attending that seminar?  
 2 A. No, I don't.  
 3 Q. So you can't help us on the content at all?  
 4 A. No.  
 5 Q. Can you help us, part L of the Building Regulations  
 6 deals with what?  
 7 A. Conservation of heat and power.  
 8 Q. Yes.  
 9 Let's go now to 2013. This is {SEA00014420}. If  
 10 you just have a look down the descriptions of those  
 11 seminars, we see at item 2 there is a seminar entitled  
 12 "Building Regulations Update" by Butler & Young. Did  
 13 you attend that seminar? Can you recall?  
 14 A. I don't recall, but I know Butler & Young, and that  
 15 would have been one I should have targeted, but I do not  
 16 recall .  
 17 Q. You don't recall?  
 18 A. No.  
 19 Q. Okay.  
 20 So we skip now to 2016, because we know there were  
 21 no seminars in 2014 and 2015, and we go to  
 22 {SEA00014419}.  
 23 Now, looking at those, we can see in the first entry  
 24 there is a seminar called "New CDM Regulations 2015".  
 25 Do you recall attending that seminar?

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1 A. I do, yes.  
 2 Q. Can you give us an idea of the content of that seminar?  
 3 A. It was giving an overview to help designers understand  
 4 their duties under the new CDM Regulations.  
 5 Q. Do you recall much about the content of it?  
 6 A. Not that I could recite here. I know they left us  
 7 documentation, which I think you have.  
 8 Q. You can't recall any particular takeaway points about  
 9 what your obligations would be under the 2015 CDM regs?  
 10 A. I think this seminar was very useful to me to understand  
 11 the changes.  
 12 Q. Yes.  
 13 A. But as -- so I would just be discussing what  
 14 I understand the changes were.  
 15 Q. Finally, let's just turn to 2017. We have  
 16 {SEA00014422}. Then if you look down that list, fifth  
 17 line down, we have "A Guide to Detailing of Interfaces  
 18 on Windows and Façades", 21 June for an hour and a half  
 19 by Tremco Illbruck. Do you recall attending that  
 20 seminar?  
 21 A. I do, yeah.  
 22 Q. Can you recall the content?  
 23 A. I think I can, yes. I think I suggested it.  
 24 Q. What was it about, in broad terms?  
 25 A. Tremco manufacture and supply various products to

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1 assist -- well, to assist -- to seal up around windows  
 2 in masonry openings or metal openings, just as a way of  
 3 meeting the requirements for airtightness and thermal  
 4 insulation .  
 5 Q. Was there anything about fire protection, fire safety,  
 6 in relation to openings dealt with in that seminar?  
 7 A. Not that I can recall .  
 8 Q. Okay.  
 9 This seminar was held not long after the  
 10 Grenfell Tower fire . Do you think that's why this  
 11 seminar was requested, or would it have been in the  
 12 diary prior to that?  
 13 A. No, no, these are lined up, I think .  
 14 Q. Now, prior to or during your work on the Grenfell Tower  
 15 project, did you ever attend training on part B4 of  
 16 schedule 1 to the Building Regulations?  
 17 A. No.  
 18 Q. Part L of the Building Regulations, schedule 1?  
 19 A. No.  
 20 Q. Approved Document B on fire safety?  
 21 A. No.  
 22 Q. How to design a rainscreen cladding system, did you  
 23 undergo any kind of training in relation to that or any  
 24 kind of professional ...?  
 25 A. I can't recall anything formal, but my knowledge goes

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1 back quite a way, so there may have been.  
 2 Q. Okay. But you can't recall anything specific?  
 3 A. No.  
 4 Q. Okay. I now want to turn to consider the initial  
 5 contact with Studio E about the Grenfell Tower project.  
 6 Can we go to {SEA00000007/1}. I want to look at the  
 7 email at the bottom of the page, so if we can highlight  
 8 that .  
 9 So we can see this is an email of 29 February 2012  
 10 from Mark Anderson to Mr Kuszell, your colleague. Can  
 11 you just read that to yourself, and then if the operator  
 12 can just go over the page and show you the rest of the  
 13 email. We're going to come back to this email a number  
 14 of times and I want to ask you a few questions about it,  
 15 so if you could just read it .  
 16 (Pause)  
 17 A. Okay.  
 18 Q. Thank you.  
 19 Now, this is an email you would have seen, because  
 20 if we go back to the first page of this document, and if  
 21 we look at the top of the first page, we can see that  
 22 you are sent this email on 29 February by Mark Anderson  
 23 of the TMO in Mr Kuszell's absence. Do you see that?  
 24 A. Yeah.  
 25 Q. "In Andrzej's absence would you please review my request

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1 below and make contact with me?"  
 2 Now, was that the first communication that, to your  
 3 knowledge, Studio E had had with the TMO in respect of  
 4 the Grenfell Tower project?  
 5 A. Yes.  
 6 Q. So you're not aware of any earlier communication about  
 7 that project?  
 8 A. I think Andrzej may have discussed it with me prior, but  
 9 I don't think it really registered, not in the form that  
 10 it appeared --  
 11 Q. Do you recall what he might have said to you before this  
 12 point?  
 13 A. No, I ... I will be honest, he may have done, but my  
 14 recollection was I received this email with some  
 15 surprise .  
 16 Q. Why were you surprised?  
 17 A. Well, that they were so advanced in their thinking in  
 18 terms of the scope of the project .  
 19 Q. Right.  
 20 A. You know, I was thinking maybe that they were going to  
 21 talk about it .  
 22 Q. Now, we saw a moment ago the main email states that  
 23 "Additionally, commissions will be via the KCTMO". What  
 24 did you understand that to mean? Had you heard of the  
 25 TMO? Did you know who the TMO were?

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1 A. I might have been, because of my involvement on KALC,  
 2 I might have been aware that the Grenfell Tower was  
 3 managed by a different organisation, but I can't recall  
 4 exactly .  
 5 Q. If you can, thinking back to this point, as at  
 6 February 2012, what was your understanding about which  
 7 organisation would be leading on commissioning the  
 8 Grenfell Tower project?  
 9 A. Well, as per the email, that was my --  
 10 Q. KCTMO?  
 11 A. That's --  
 12 Q. Yes. Who did you consider to be your client at this  
 13 point?  
 14 A. I don't think we had a client as yet .  
 15 Q. Sorry. Moving forward, who did you initially consider  
 16 to be your client on the project?  
 17 A. The approach was from Mark Anderson and -- director of  
 18 assets, investment and engineering, and he was our first  
 19 point of contact .  
 20 Q. Yes.  
 21 A. Yeah.  
 22 Q. We will come back to that email again in a moment, but  
 23 can we now go to {SEA00003567}, which is the email you  
 24 sent to Mr Kuszell on 29 February 2012 after receiving  
 25 that initial brief for the project .

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1 Now, we looked at this with Mr Kuszell in detail  
 2 this morning. I think you were present at that time.  
 3 You say in the final paragraph of this email, you can  
 4 see it in the second sentence:  
 5 "We are a little green on process and technicality  
 6 so I propose some rapid CDP - MF being my first point of  
 7 call. I will hold off circulating this ..."  
 8 I want to ask you a few questions about that. What  
 9 do you mean by "a little green", to start with?  
 10 A. You appreciate that email arrived at 8 o'clock and  
 11 I responded at 8.20. I was on a train coming back from  
 12 Ashford. The proposal to overclad and renew the heating  
 13 and the extent of works described in that email was  
 14 considerable, and as I saw it, that was certainly, given  
 15 that the building would be occupied, not something  
 16 I could initially appreciate how that could be done. So  
 17 process and technicality -- at that point I was  
 18 definitely thinking of how you replace windows, replace  
 19 heating, completely reconfigure a building which has got  
 20 all the tenants in place.  
 21 Q. Mr Sounes, can you just keep your voice up, so we can  
 22 all hear.  
 23 A. Yeah.  
 24 Q. So focusing in on that word "process", "green on  
 25 process", what were you specifically thinking?

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1 I appreciate you were on a train and this was an initial  
 2 email you sent back, but thinking about what was in your  
 3 mind at that point, what do you mean "green on process"?  
 4 A. How you actually -- the logistics of undertaking that  
 5 work with an occupied building.  
 6 Q. Yes.  
 7 A. So it seemed quite daunting at that time, and that's why  
 8 I thought I would ask someone who may have done it  
 9 before.  
 10 Q. We will come on to that.  
 11 Green on technicality, again, what did you have in  
 12 mind when you wrote that?  
 13 A. I think it was probably more thinking of the mechanical  
 14 and electrical, the services. But I ... if you were to  
 15 ask me at that point, I think that's what I would have  
 16 answered, but of course there's ...  
 17 Q. A moment ago you mentioned the overcladding as something  
 18 that was pretty significant. Did you notice the  
 19 overcladding being part of the proposal at this stage?  
 20 A. Yes, I did.  
 21 Q. What did you think about that?  
 22 A. I felt that to overclad a building with tenants inside  
 23 poses a bit of a -- to an architect who is used to  
 24 working on a site that's free of anyone who is not  
 25 involved on construction itself, it struck me as

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1 initially a challenge.  
 2 Q. Were you also thinking about Studio E's lack of  
 3 experience on overcladding projects, or your lack of  
 4 experience on overcladding projects?  
 5 A. Erm ... I didn't think the overcladding itself was the  
 6 issue. I really felt it was the residents in place  
 7 which was going to pose the biggest challenge.  
 8 Q. Okay.  
 9 As you have just mentioned, you say "MF being my  
 10 first port of call", does MF there refer to Max Fordham?  
 11 A. It does, yes.  
 12 Q. Can we just look at what you have said about this  
 13 comment at paragraph 64 of your witness statement. This  
 14 is {SEA00014273/32}. So you say there:  
 15 "In the internal email I expressed my view that I  
 16 felt Studio E was 'a little green on process and  
 17 technicality', because Studio E, as a practice, had not  
 18 previously been involved in high-rise residential,  
 19 heating renewal nor the overcladding of occupied  
 20 buildings. I said I would speak to Max Fordham to  
 21 develop my understanding of the process."  
 22 So we know from TMO's email that we just looked at  
 23 that the principal objectives included both the  
 24 overcladding of the tower and to rationalise the heating  
 25 and hot water systems; that's correct, isn't it?

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1 A. Yes.  
 2 Q. In those circumstances, you proposed rapid CDP -- but  
 3 you mean CPD, continuing professional development.  
 4 A. Yes.  
 5 Q. What sort of CPD did you have in mind at the time that  
 6 you wrote that email?  
 7 A. I think nothing more than a consultation to understand  
 8 the feasibility of how it could be done.  
 9 Q. What do you mean by a consultation to understand  
 10 feasibility?  
 11 A. With Max Fordham, someone at Max Fordham who I may have  
 12 known, I don't know, I can't recall, but I thought that  
 13 they would most likely have done a project of this kind  
 14 before.  
 15 Q. By a consultation, do you mean speaking to someone at  
 16 Max Fordham?  
 17 A. Yes, a phone call, yeah. It would have been a phone  
 18 call.  
 19 Q. We will come to the discussion with Max Fordham just in  
 20 a moment. Did you have any other CPD in mind at this  
 21 time?  
 22 A. No.  
 23 Q. Did you or the team undertake any CPD at this time?  
 24 A. By CPD of something that's accredited in some way, no.  
 25 Q. Or any other form of seminars or research, did you do

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1 anything like that at this time?  
 2 A. I think at that point -- the research came later.  
 3 I think I would have wanted to understand from someone  
 4 like Max Fordham that the project proposed could be  
 5 done. That's my recollection.  
 6 Q. If we could just go back to the email so you have it in  
 7 front of you, {SEA00003567}, the words you used there  
 8 are, "I propose some rapid [CPD]" in the final paragraph  
 9 there.  
 10 What did you mean by rapid?  
 11 A. Rapid as in the next day or two, before I spoke to Mark  
 12 perhaps. I --  
 13 Q. Yes. You also say, just before that, that you need to:  
 14 "... acknowledge receipt, ask to meet, then walk the  
 15 site with him (?) to understand the scope described,  
 16 probably with Neil."  
 17 Is that referring to Neil Crawford?  
 18 A. It must be, yeah. I can't think who else it would have  
 19 referred to, yes.  
 20 Q. Did you in fact walk the site with Neil Crawford --  
 21 A. No.  
 22 Q. -- at this time?  
 23 A. Not on the subsequent site visit, it wasn't with Neil.  
 24 Q. So we know that you spoke to Max Fordham. Who at  
 25 Max Fordham did you speak to?

1 A. I don't know. I don't know, I cannot recall.  
 2 Q. Do you actually recall having a conversation with  
 3 Max Fordham about the Grenfell Tower refurbishment and  
 4 what was involved?  
 5 A. I'm pretty sure I did, but, you know, press me to  
 6 remember who or where, I'm not sure. I can speculate,  
 7 but I'm not sure.  
 8 Q. Can we just look at what you say about this in your  
 9 witness statement. So if we look at paragraph 64 of  
 10 your witness statement, {SEA00014273/32}. If we look  
 11 four lines down, you say:  
 12 "I said I would speak to Max Fordham to develop my  
 13 understanding of the process."  
 14 Then you say:  
 15 "I learnt that they had indeed been involved in  
 16 similar projects before, and despite my initial  
 17 uncertainty, I was comfortable that Studio E had the  
 18 experience and expertise to take on the work being  
 19 discussed at this stage."  
 20 Do you see that?  
 21 So when you wrote this statement, did you have  
 22 a recollection of a conversation with Max Fordham?  
 23 A. As I say, I'm pretty sure I did, but the recollection of  
 24 a conversation, I cannot remember the particulars or who  
 25 I spoke to, and it could have been a number of

1 individuals, so I'm not sure.  
 2 Q. So we don't know who you spoke to.  
 3 You have given us an indication here you learnt they  
 4 had been involved in similar projects before. What else  
 5 did you learn from speaking to Max Fordham, do you  
 6 recall?  
 7 A. Erm ... I'm afraid all I can recall is that the process  
 8 of overcladding and renewing the heating was something  
 9 that they had been involved in before.  
 10 Q. Why did you think that Max Fordham would be of help in  
 11 that area?  
 12 A. Given their breadth of experience, and the fact that  
 13 they were a subconsultant to us on KALC and it sounded  
 14 like they would be involved on the project, and the fact  
 15 that I had been working with them since I had started at  
 16 Studio E., I had --  
 17 Q. Now, we know that they're building services engineers;  
 18 yes? So they would have expertise in the heating  
 19 system; is that correct?  
 20 A. Yes.  
 21 Q. And expertise around thermal performance of a building;  
 22 is that correct?  
 23 A. Yes. Yes.  
 24 Q. But would you agree that they would not be able to  
 25 explain to you what was required of an architect when

1 designing an overcladding project?  
 2 A. I would agree, yeah.  
 3 Q. You say there, looking back at paragraph 64, in the  
 4 final lines:  
 5 "I learnt that they had indeed been involved in  
 6 similar projects before, and despite my initial  
 7 uncertainty, I was comfortable that studio E had the  
 8 experience and expertise to take on the work being  
 9 discussed at this stage."  
 10 Can you explain how this conversation made you  
 11 comfortable?  
 12 A. Going back to the email, the concern was just the  
 13 feasibility of undertaking that extent of work on  
 14 an occupied building. At that point, that was the  
 15 concern. Thereafter -- at that stage it was a design  
 16 exercise to take on.  
 17 Q. Okay.  
 18 Now, you had recommended to the director,  
 19 Mr Kuszell, that there would be rapid CPD. I think  
 20 we've established that you personally didn't do anything  
 21 other than speak to Max Fordham; is that correct?  
 22 A. That comment was to understand the feasibility of that  
 23 type of project. Thereafter, after the meeting, after  
 24 we got going, I did more research, which is obviously  
 25 covered further on.

1 Q. What kind of research did you do thereafter?  
 2 A. I started online, and obviously I can't recall exactly  
 3 what I found, but I found that this type of project was  
 4 a bit of a niche in the market, overcladding residential  
 5 high-rises, and I came across the company CEP. I think  
 6 that was a month or so later.  
 7 Q. Yes.  
 8 A. Yeah.  
 9 Q. So you did some online research, you found CEP, and we  
 10 know -- and we'll come back to this -- that you have  
 11 contact with CEP later down the line.  
 12 Did you do any other form of research, either at  
 13 this point or in the few weeks after?  
 14 A. I can't think of anything.  
 15 Q. Okay.  
 16 So can you explain how it was that you were able to  
 17 conclude that Studio E had the experience and the  
 18 expertise to take on this work?  
 19 A. The project was, certainly for the first year, really  
 20 a planning application primarily, and I felt that, given  
 21 that our involvement on KALC and previous experience,  
 22 that was something well within our and my ability to  
 23 take on. Negotiating the detail, the detail of the  
 24 plans and the appearance of the building, making  
 25 a submission, co-ordinating with consultants -- those

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1 were all things I felt were within my experience and  
 2 ability.  
 3 Q. So did you in fact decide that it was possible for you  
 4 to learn on the job as you went through the project?  
 5 A. Yes.  
 6 Q. Did you ever advise the TMO that Studio E wasn't  
 7 experienced in high-rise projects or overcladding?  
 8 A. I can't recall doing that, no.  
 9 Q. What about Appleyards, who later became Artelia? Did  
 10 you ever advise them in their role that you weren't  
 11 experienced in high-rise projects or overcladding?  
 12 A. I don't think we held ourselves out as anything other  
 13 than who we were. I can't remember any conversations or  
 14 anything written that set out to confirm that.  
 15 Q. But did you ever say to them, "By the way, just so you  
 16 know, and you need to understand this, we aren't  
 17 experienced in high-rise and we aren't experienced in  
 18 overcladding"? Did you ever say that to them?  
 19 A. I can't recall doing that, but, as I say, I don't think  
 20 we held ourselves out as if we had.  
 21 Q. Do you mean by that that you think it would have been  
 22 obvious to those who were appointing you and using you  
 23 that you didn't have that experience?  
 24 A. I believe so.  
 25 Q. To your knowledge, was Studio E LLP already in financial

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1 difficulty at this time? So we're talking --  
 2 A. 2012.  
 3 Q. -- early 2012. Were there financial difficulties in the  
 4 firm at this time?  
 5 A. It's too long ago, I can't remember.  
 6 Q. Was it the case that Studio E was eager to retain  
 7 lucrative projects, despite not having the expertise?  
 8 Was that part of the motivation?  
 9 A. I think it's a bit of an unfair question. I think  
 10 architects are out there to be architects, and if  
 11 a project comes along and there is no reason for you not  
 12 to do it, you will do it.  
 13 Q. In your experience at Studio E, have you ever said,  
 14 "Actually, we can't do this project, this is too much  
 15 for us or we're not right for this project, actually you  
 16 should think about using X or Y"? Has that ever  
 17 happened?  
 18 A. I think it has, but usually on smaller projects.  
 19 Q. But that's not something that occurred to you to say in  
 20 the context of the Grenfell project?  
 21 A. No.  
 22 Q. Can we look at paragraph 63 of your statement next, if  
 23 we go to {SEA00014273/32}.  
 24 Now, we're going to come back to the OJEU limit  
 25 point in a moment and look at some emails around that,

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1 but for now I want to look at what you say two to three  
 2 lines from the bottom of paragraph 63. So you say:  
 3 "... and Studio E may not be able to qualify in  
 4 a bid process."  
 5 Do you see that? We looked at that with Mr Kuszell  
 6 this morning.  
 7 Why did you think Studio E may not have been able to  
 8 qualify in a bid process at this time?  
 9 A. Re-reading that email, it obviously doesn't mention  
 10 a bid process, it just mentions the OJEU threshold.  
 11 Q. Yes, but you have said in your email --  
 12 A. I responded perhaps --  
 13 Q. Sorry, you said in your statement:  
 14 "The reason that I felt his email did not add up was  
 15 that I believed the overall fee to deliver the Project  
 16 would be higher than the OJEU threshold, and Studio E  
 17 may not be able to qualify in a bid process."  
 18 It's that bit I want to ask you about.  
 19 Why did you think that they wouldn't qualify in  
 20 a competitive tender process?  
 21 A. Well, that would be relevant experience.  
 22 Q. Yes.  
 23 A. The bid process is either in two stages or it's broken  
 24 down into quality and commercial sections, and a good  
 25 deal of that is qualification with relevant experience,

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1 usually.

2 Q. Yes. Was it anything to do with Studio E's financial

3 standing as well at that time, or would it have been

4 about its experience that led you to write that in your

5 statement?

6 A. What, about exposing ourselves to working at risk?

7 Q. Possibly -- well, no, more about qualifying in a bid

8 process. Would you have been concerned that Studio E's

9 financial position may have been seen to be precarious

10 at that time?

11 A. No.

12 Q. No?

13 A. No. I think it was mentioned on KALC. They asked for

14 two or three full-size leisure centres and full-size

15 academies built within the last period of five years,

16 I can't remember, which was quite a high threshold, and

17 they do that to try and whittle down the field.

18 Q. Yes. So if they had done that here and they had said,

19 "Give us an example of two or three overcladding

20 high-rise-type projects that you have had in the last X

21 many years", Studio E wouldn't have been able to put

22 that down, would they?

23 A. Correct, yeah.

24 Q. Given that you were aware that Studio E might not be

25 able to qualify in a bid process, did you have any views

1 at that stage about the expertise and resources that you

2 would need to engage on this project?

3 A. I'm a little bit unclear if you're referring to

4 consultants or --

5 Q. Either, whether additional consultants or additional

6 expertise in other ways. Did you have any views at that

7 stage as to what it was going to take for Studio E to be

8 in a position to deliver this project properly and in

9 accordance with the client's objectives?

10 A. I think the -- having a strong suite of consultants was

11 critical for us to be able to deliver the project, yes.

12 Q. So you're thinking about external consultants. Were you

13 ever thinking about hiring anyone else at Studio E,

14 getting any additional --

15 A. No.

16 Q. -- expertise into the firm?

17 A. No.

18 Q. Did the TMO ever question whether Studio E was

19 appropriately qualified and resourced to carry out the

20 Grenfell project?

21 A. I don't recall any questions from the TMO on that.

22 Q. Or RBKC, for that matter, did they ever query this?

23 A. Not -- not that I can recall.

24 Q. There was discussion this morning about a competence

25 check for the Grenfell Tower project. To your

1 knowledge, was a competence check ever carried out by

2 the TMO or RBKC in relation to Studio E's suitability

3 for the project?

4 A. Not that I'm aware of. I'm -- what you describe sounds

5 like a formal process. I don't recall anything like

6 that.

7 Q. You don't remember that?

8 A. No.

9 Q. What about the CDM co-ordinator on the project? That

10 was Artelia or Appleyards up to 2015 when the CDM regs

11 changed. Did they ever question whether Studio E was

12 appropriately qualified and resourced to carry out the

13 project?

14 A. No. Not to my recollection.

15 Q. Were you aware that the residents had questioned why

16 Studio E had been chosen for the project?

17 A. It's too long ago. Maybe, I don't remember.

18 Q. You were in the hearing room this morning. Mr Kuszell

19 was shown the minutes from a Kensington Academy and

20 Leisure Centre residents' forum on 28 March. Do you

21 remember that this morning?

22 A. Yes, I do.

23 Q. Mr Kuszell was present, and there Mr Daffarn raised

24 a question: "Why was Studio E chosen to do the initial

25 work?" Do you recall being made aware of that at the

1 time?

2 A. No.

3 Q. Just to finish off on those questions, were you ever

4 asked to justify Studio E's suitability for this project

5 to anyone?

6 A. No, not that I can recall.

7 Q. Okay.

8 Can we go now to paragraph 65 of your statement.

9 That's {SEA00014273/32}.

10 I want to look about eight lines down at the

11 sentence beginning:

12 "The knowledge that Leadbitter ..."

13 So there you say:

14 "The knowledge that Leadbitter/Bouygues, a large

15 design and build contractor, would be engaged on the

16 Project was reassuring as we could expect specialist

17 subcontractors to be involved from the outset. We felt

18 more than able to take on the lead designer role as we

19 had on KALC. I believe that KCTMO did later enter into

20 some form of agreement with Leadbitter ..."

21 Focusing on what you have said there, you refer to

22 taking comfort in the fact that Leadbitter and Bouygues

23 would be engaged in the contract and that they would

24 appoint specialist subcontractors. Was it therefore

25 your intention from the outset to rely on the expertise

1 of specialist subcontractors for these works?  
 2 A. I think my experience is that on virtually all public  
 3 funded projects, the project is taken through a design  
 4 and build route, which transfers all responsibility onto  
 5 a main contractor, design responsibility. So were we  
 6 relying on that knowledge? I guess we were to some  
 7 degree, yes.  
 8 Q. I'm going to come back to what you have just said in  
 9 a moment about design and build. But the question  
 10 I asked you was: was it your intention from the outset  
 11 to rely on the expertise of specialist subcontractors  
 12 for these works?  
 13 A. I couldn't say we were -- we certainly would have  
 14 expected a specialist subcontractor to be engaged by  
 15 Leadbitter as soon as they were appointed, but whether  
 16 that was our intention or the contractor's intention,  
 17 I don't think I can answer that.  
 18 Q. I mean, you have said here in your statement that it was  
 19 reassuring, the knowledge that you were going to get  
 20 Leadbitter, a large design and build contractor, on the  
 21 project. Can you just help us, in what way was that  
 22 reassuring for you?  
 23 A. A large contractor obviously has a large number of  
 24 specialists' experience to draw on, certainly more than  
 25 I would, or we would, as a single firm of architects,

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1 and -- sorry, back to your question?  
 2 Q. It was why it was reassuring that you've got Leadbitter  
 3 or Bouygues engaged on the project. Why was that  
 4 reassuring to you at this stage?  
 5 A. It's reassuring that we wouldn't be expected to design  
 6 all the detail.  
 7 Q. So you would be looking for them or their subcontractors  
 8 to help with the design of the detail; yes?  
 9 A. If that's how they chose to do it, yes.  
 10 Q. At that stage, would you have thought of the  
 11 overlapping as design detail?  
 12 A. Yes.  
 13 Q. You would?  
 14 A. Yes.  
 15 Q. So did you think you were going to be doing any design  
 16 of the overlapping yourselves?  
 17 A. By that, I mean, we designed from the get-go, but if  
 18 you're referring to the final designer, the final design  
 19 that you do towards construction, we would not expect to  
 20 be doing that, no.  
 21 Q. Right. You referred -- sorry, carry on.  
 22 A. I think that would be true on most projects. Even  
 23 traditional projects, I think we would have sought to  
 24 have the envelope as contractor's design element --  
 25 contractor's design portion. Sorry, it's a bit off

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1 topic, but ...  
 2 Q. Does that mean that you are expecting them effectively  
 3 to take the ultimate responsibility for the design?  
 4 A. Of that element.  
 5 Q. Of that element?  
 6 A. Yes.  
 7 Q. And you not have responsibility for it?  
 8 A. No. No.  
 9 Q. Just that it was reassuring that they would have that as  
 10 well?  
 11 A. To complete the design, you expect the subcontractor to  
 12 take that on.  
 13 Q. Okay.  
 14 You talked earlier about design and build and you  
 15 have talked about it here. You have said in almost all  
 16 public procurement contracts the expectation is it would  
 17 be a design and build.  
 18 At the outset of your involvement in the  
 19 Grenfell Tower project, did you think it was likely to  
 20 be a design and build procurement?  
 21 A. Yes. Yes, that original email I think alludes to it.  
 22 Q. Yes, so that was always in your thinking?  
 23 A. Yes.  
 24 MS GRANGE: Mr Chairman, if I can just finish this run of  
 25 questions.

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1 SIR MARTIN MOORE-BICK: How long do you think you might take  
 2 to do that?  
 3 MS GRANGE: About two minutes, max.  
 4 SIR MARTIN MOORE-BICK: If it's only two minutes, of course.  
 5 MS GRANGE: Thank you.  
 6 Do you agree that Studio E was under an express duty  
 7 to ensure that the firm organised itself effectively in  
 8 terms of the preparation and resourcing for what was,  
 9 for the practice, a new and challenging type of project?  
 10 A. Sorry ...  
 11 Q. I'll say it again, sorry, it is a long question.  
 12 Do you agree that Studio E was under a duty to  
 13 ensure that the firm organised itself effectively in  
 14 terms of preparation and resourcing for what was, for  
 15 the practice, a new and challenging project?  
 16 A. So the second phrase is ...  
 17 Q. Did you think you had a duty to organise yourself  
 18 effectively and to resource properly for what was  
 19 effectively a new and challenging project that you had  
 20 not done before?  
 21 A. Yes, I would agree with that for any project.  
 22 Q. Can we just go to the RIBA Handbook of Practice  
 23 Management, this is the ninth edition. That's at  
 24 {INQ00011309}. This is the May 2013 edition of the RIBA  
 25 Practice Management Handbook.

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1 If we go to {INQ00011309/37} and have a look at  
 2 paragraph 2.11 -- is there a way of blowing that up?  
 3 Yes. Can you read that on the screen? Can you see  
 4 that?  
 5 A. Yeah.  
 6 Q. If you look at the right-hand side of the page, and you  
 7 look at "Principle 2: Competence" in the blue box, can  
 8 you see there it says:  
 9 "In the performance of their work Members shall act  
 10 competently, conscientiously and responsibly. Members  
 11 must be able to provide the knowledge, the ability and  
 12 the financial and technical resources appropriate for  
 13 their work."  
 14 Do you see that there? Can we look over at page 38  
 15 {INQ00011309/38} at paragraph 2.2 on the left-hand side.  
 16 If we can zoom in a little on the lower half of that  
 17 left-hand side of the page, we see there at 2.2:  
 18 "Members should realistically appraise their ability  
 19 to undertake and achieve any proposed work. They should  
 20 also make their clients aware of the likelihood of  
 21 achieving the client's requirements and aspirations. If  
 22 members feel they are unable to comply with this, they  
 23 should not quote for, or accept, the work."  
 24 Now, did you at any stage on the Grenfell project,  
 25 and in accordance with those guidelines, conduct

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1 a realistic appraisal of Studio E's ability to undertake  
 2 the work involved?  
 3 A. Sorry, Studio E or myself?  
 4 Q. Studio E.  
 5 Do you remember any kind of appraisal taking place  
 6 as to whether or not Studio E could undertake and  
 7 achieve the work?  
 8 A. Erm ... I'm afraid I can't think of any document that  
 9 would constitute an appraisal.  
 10 Q. Or any kind of informal appraisal?  
 11 A. I think ... I think I just have to go back to my  
 12 statement. I think we as a group felt it was within our  
 13 ability to service the project.  
 14 MS GRANGE: Okay.  
 15 Let's pause there. Thank you.  
 16 SIR MARTIN MOORE-BICK: All right?  
 17 MS GRANGE: Yes.  
 18 SIR MARTIN MOORE-BICK: Good.  
 19 Mr Sounes, we will break now for the day. I'm going  
 20 to have to ask you to come back tomorrow to continue  
 21 giving your evidence.  
 22 I'm also going to have to ask you, please, not to  
 23 talk about your evidence or the subject matter of your  
 24 statement at all with anyone else while you're in the  
 25 course of giving evidence. Is that all right?

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1 THE WITNESS: Yeah.  
 2 SIR MARTIN MOORE-BICK: We will resume at 10 o'clock  
 3 tomorrow. If you would like to go with the usher, she  
 4 will look after you.  
 5 (Pause)  
 6 Good, 10 o'clock tomorrow, then, please. Thank you.  
 7 (4.36 pm)  
 8 (The hearing adjourned until 10 am on Tuesday, 3 March 2020)

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