

Coroner's Inquests into the London Bombings of 7 July 2005

Hearing transcripts - 8 December 2010 - Morning session

1 Wednesday, 8 December 2010

2 (10.00 am)

3 LADY JUSTICE HALLETT: Mr Keith?

4 MR KEITH: Good morning, my Lady. My Lady will recall that
5 last night, while reading out a witness statement,
6 I suggested that the witness may have been mistaken in
7 supposing that there had been overcrowding on the
8 Northern Line. My interjection was incorrect. It was
9 based upon a witness statement from Mr Barr, the manager
10 at Transport for London responsible for this area, but
11 that statement I'm afraid in turn was also incorrect.
12 The true position, which will be reflected,
13 I'm sure, in an amended witness statement in due course,
14 is that there was a problem on the Northern Line because
15 a northbound Northern Line train had become defective at
16 Balham at 6.29 that morning. It suffered a broken axle
17 box and could not be moved without specialist equipment
18 and that resulted in disruption to the Northern Line and
19 a number of trains were taken out of service because one
20 of the Northern Line tracks was inoperable.
21 That would explain why there was still delays and
22 overcrowding on the Northern Line around about 8.45.
23 My Lady, today we are due to receive evidence
24 primarily from the firefighters who responded to
25 King's Cross. May I commence by reading out the witness

1 statements in relation to the first appliance, A242,
2 that arrived, rather than going straight to the live
3 witnesses, because it will set the chronology for the
4 evidence to come.

5 My Lady will have seen that one of the witnesses for
6 this morning is Andrew Newton from that appliance,
7 Alpha 242. There are one or two aspects about his
8 statement which seemed to us, on reflection, to be of
9 importance and, therefore, I have asked that enquiries
10 be made as to whether or not we may hear from Mr Newton
11 orally, as opposed to having his statement read.

12 So, for the meantime, I propose not to read out his
13 statement, lest we are able to contact him and ask him
14 to come to give evidence before you.

15 So may I start, then, with the statement, please, of
16 Aaron Roche, whose statement is dated 19 September 2005.

17 My Lady will recall, before I read out this
18 statement, that the time line records at 09.02.59 the
19 London Fire Brigade receiving a call in relation to
20 smoke in the King's Cross tunnels. Mr Coltart has
21 observed privately, and he is quite right, that that
22 extract doesn't accurately reflect, perhaps, entirely
23 the call that was made to the Fire Brigade from
24 Transport for London.

25 Could I, for your note, simply record and will amend

1 the time line in due course that the call is timed by
2 the Transport for London call at 09.04.22, but is logged
3 by the London Fire Brigade at 09.03.46, and the caller
4 at Transport for London, London Underground, reports
5 smoke in the tunnel on the eastbound Piccadilly Line,
6 King's Cross Underground, Euston Road.

7 My Lady, those times reflect the first communication
8 to the Fire Brigade in relation to the possibility of
9 smoke at King's Cross in the tunnel there.

10 Mr Roche's statement reads as follows:

11 Statement of MR AARON ROCHE read

12 "I am a leading firefighter for the London Fire
13 Brigade and have held this position for six years now,
14 before that working for two and a half years as
15 a firefighter. I am currently based on blue watch at
16 Soho fire station."

17 May I pause there? My Lady will have seen in the
18 MOBIS reports references to A24. A24 is the sign, call
19 sign, for Soho fire station.

20 "At 09.00, Thursday, 7 July, I started my shift at
21 Soho and was on pump A242 ..."

22 So one of the pumps at station A24.

23 "... in company with driver Firefighter Wilson.
24 Firefighter Shaw and Firefighter Newton completed the
25 rest of the four-man crew. At approximately 09.04, the

1 same day, shortly after coming on duty, we received
2 a call to smoke issuing at Euston Square,
3 London Underground. We mobilised and proceeded to the
4 incident, but progress was hampered by heavy traffic and
5 en route I noticed an unusually high number of emergency
6 vehicles attempting to make their way through the
7 traffic against us."
8 Could we have on the screen, please, LFB11 [LFB11-1] ?
9 My Lady will see on the first page there the time of
10 the call that I gave a few moments ago, 09.03.46, and
11 the fourth appliance listed there of the total
12 appliances who respond, you will see, A242, Leading
13 Firefighter Aaron Roche.
14 Then over the page [LFB11-2] , the incident message commences
15 with a message 09.02.59:
16 "King's Cross station London Underground,
17 Euston Road."
18 Then the mobilisation call following the "commit",
19 which, as you will recall from Aldgate, is the internal
20 electronic signal for the purposes of committing an
21 appliance to an incident at 09.04.35, the mobilisation
22 call is 09.04.35:
23 "Smoke issuing in tunnel, A1, King's Cross tunnel,
24 Euston Square station London Underground, Euston Road,
25 St Pancras."

1 So it is plainly a split attendance.
2 Then my Lady will see further down the page
3 appliances are sent to Euston Square station
4 London Underground:
5 "Appliances to [rendezvous] Euston Road, southside
6 junction Gower Street."
7 Then over the page, A242:
8 "Proceed to King's Cross station London Underground,
9 Euston Road, St Pancras", hence the split attendance.
10 My Lady will know that at the end of this document,
11 as with Edgware and Aldgate, there is then a summary of
12 the status changes, page 20 [LFB11-20] , please. The fifth entry
13 there is A242, mobilised 09.04.35, mobile 09.07, arrive
14 09.13.04:
15 "I instructed firefighters Newton and Shaw to rig in
16 breathing apparatus (BA) on arrival. On our arrival,
17 I was met by a member of London Underground Limited
18 management who informed me there had been a number of
19 power surges across the Underground system which had led
20 to the alarm. However, on making my way down the stairs
21 to the ticket hall below, accompanied by
22 Firefighters Newton and Shaw, I began to notice members
23 of the public hurrying up the escalators with faint
24 blackening around their nostrils, a sign that they had
25 smoke inhalation.

1 "I entered the control room of this Underground
2 station in order to gain more information about the
3 incident, but the quality and quantity of the available
4 information was very poor due to a lack of
5 communications between their staff.

6 "At this time, I noticed distressed members of the
7 public were now emerging from the escalators with
8 extensive blackening around the mouth and nose. Some
9 casualties were emerging now with what appeared to be
10 collision injuries such as bloodied noses and facial
11 injuries. At this point, I told Firefighter Wilson to
12 order two additional appliances for manpower so that we
13 could commit crews to investigate ..."

14 If we could have, please, again, LFB11 on the
15 screen, at 09.19.46, that's page 3 [LFB11-3] of the document,
16 my Lady will see at 09.13.40, an incoming message from
17 A242, indicating arrival, and then at 09.19.46, A242,
18 incoming message:

19 "Request additional 2 pumping appliances for
20 manpower, due to members of the public with smoke
21 inhalation."

22 The sentence I will read again:

23 "At this point, I told Firefighter Wilson to order
24 two additional appliances for manpower so that we could
25 commit crews to investigate the cause of the incident.

1 I instructed Firefighter Newton and Firefighter Shaw not
2 to go any further into the incident until additional
3 resources had arrived, but to assist with first aid.
4 Brigade procedure states that for any sub-surface entry
5 with breathing apparatus we have to have emergency crews
6 available for backup for the safety of our firefighters.
7 "At this stage, police and ambulance remained at
8 ground level and had no information to offer. I went up
9 to ground level to liaise with them to try to gain any
10 additional information and to inform them of the
11 situation below ground. I also informed ambulance
12 services that a large number of paramedics would be
13 required to deal with the casualties.
14 "I re-evaluated the situation and decided it was now
15 vital to gather more information in order to make
16 a decision on the appropriate course of action. It had
17 now been some 30 minutes since I had requested
18 additional resources. I returned to the ticket hall,
19 noticing the casualties were now completely covered in
20 soot and having breathing difficulties. I briefed
21 Firefighter Newton and Firefighter Shaw to proceed to
22 the platform level of the incident and to go as far as
23 possible with the atmosphere remaining respirable", that
24 is to say to go as far as they could under their own
25 steam without equipment:

1 "They were given strict instructions not to start up
2 their breathing apparatus sets and simply to make an
3 assessment of the incident.

4 "On their return to me, they stated that they had
5 liaised with the British Transport Police officer on the
6 platform and the quality of the information they gave
7 was very comprehensive: multiple fatalities, critical
8 injuries and body parts everywhere. On hearing this,
9 I told Firefighters Newton and Shaw to continue
10 assisting in first aid whilst we awaited additional
11 resources. I went back up to ground level and ordered
12 Firefighter Wilson to make pumps eight."

13 My Lady, if we see [LFB11-4] , we'll see at 09.36.12 an
14 incoming message from A242, from leading
15 Firefighter Roche, "Make pumps 8":

16 "This means that, due to the serious nature of the
17 incident, I had upgraded the response to an 8-pump
18 incident. With this, a further 7 pumps will attend
19 along with senior officers, fire investigation officers,
20 Fire Rescue Unit and an Incident Command Unit.

21 Firefighter Wilson did this by using his mobile phone as
22 the radio traffic was too heavy. At this time, I was
23 not aware of any other incidents. I then informed the
24 police and ambulance services of the situation and they
25 agreed to make it a major incident."

1 My Lady, it may well be that the London Ambulance
2 Service had already declared a major incident, because
3 a major incident was declared by appliance G101 at 09.21
4 which must have been before Leading Firefighter Roche
5 made his "make pumps 8" call at 09.36, and the
6 Metropolitan Police Service had also started to declare
7 a major incident at 09.15 according to computer-aided
8 dispatch record 2376:
9 "I informed the police of the situation and also
10 told them that I did not, at this stage, know if it was
11 a bomb or a crash, but it was a possibility that it
12 could be a CBRN incident and that they should consider
13 containing people for decontamination. I then began
14 planning our response on arrival of additional
15 appliances and decided that a minimum of four breathing
16 apparatus wearers would be needed to make a safe
17 assessment of the incident. I then went and stood out
18 on the Euston Road awaiting further appliances to relay
19 the information I had and the plan that I had
20 formulated.
21 "The timeframe of my actions is very unclear, due to
22 the pressure I was under, but I believe it was now
23 approximately 9.45. I then saw a fire appliance trying
24 to make its way eastbound on Euston Road blocked by
25 traffic. I also noticed a crew of Alpha 241,

1 Sub-Officer Colebrook-Taylor, Firefighters Collins,
2 trainee Firefighter Jackson and Firefighter Cook making
3 their way to me on foot carrying breathing apparatus
4 sets."

5 My Lady, for your note, we'll hear in a moment that
6 A241 notified arrival at King's Cross at 09.42.37, the
7 second appliance to arrive:

8 "I handed over to the sub-officer and relayed my
9 plan, which he agreed with. I was accompanied by
10 Firefighters Newton, Shaw, Wilson, Cook and Jackson and
11 proceeded to platform level to make an initial
12 assessment of the incident. I instructed
13 Firefighters Shaw, Newton and Cook to remain on the
14 platform available, whilst myself, Jackson and Wilson
15 entered the tunnel and made our way to the train with
16 rapid intervention sets [which is cutting gear] and
17 breathing apparatus sets.

18 "We boarded the train at the third carriage, as the
19 train was at an intersection, and the tunnel that we
20 walked down joined the train at the third carriage. On
21 boarding the train, I could see casualties seated
22 sporadically throughout being tended to by
23 London Underground first aiders. They would be what
24 I would describe as walking wounded and people suffering
25 from shock.

1 "On arrival at the first carriage, the adjoining
2 door was jammed halfway open and, as I entered the
3 carriage, I could see a sea of bodies lining the
4 carriage floor 3 to 4 deep. It was utter carnage.
5 I realised that our only access point at the other end
6 of the carriage was over the bodies, and that our
7 efforts would be best used with a two-pronged attack
8 from the front of the train as well.

9 "Quantifying the casualties was made extremely
10 difficult because the soot caused by the explosion had
11 settled on the bodies, reducing my ability to
12 distinguish between clothing and faces. It was
13 difficult to see the far end of the carriage as the
14 atmosphere was still dusty and the lighting was poor.
15 There was also a large number of dismembered bodies and
16 body parts which I could not match and the best estimate
17 I could make was 50 to 100 casualties or fatalities.

18 "Towards the middle of the carriage, there seemed to
19 be a gap in the bodies where the bomb had gone off and
20 created a space. I remember seeing an elderly lady
21 sitting on the right side of the carriage. She was
22 covered in body parts and was covered in soot. She was
23 just sitting there looking at the bodies and the carnage
24 all around her.

25 "She just looked at me, and I could just see the

1 whites of her eyes. She would have been a white female
2 with long hair, but I cannot describe her further due to
3 the soot. I instructed trainee Firefighter Jackson and
4 Firefighter Wilson to remain there and improve access
5 with the rapid intervention set. I informed them that
6 I was returning to the ticket hall to relay my findings
7 and that I would send Firefighters Cook, Newton and Shaw
8 to assist in their efforts. I left the train at the
9 first available carriage door and, as I walked back,
10 I saw various body parts and casualties and fatalities
11 lying trackside.

12 "I was met by Sub-Officer Colebrook-Taylor and
13 Assistant Divisional Officer Munns on my way up the
14 stairs and I handed over my assessment. I was
15 instructed to go to ground level and relay this
16 information to Assistant Divisional Officer Ginty.
17 I also completed the Incident Command Wallet with
18 a sketch plan of the incident and was told to remain
19 there as a source of information for oncoming personnel.
20 An Incident Command Wallet is a plastic, white, clean
21 board which information is entered onto. I was then
22 asked to brief Senior Divisional Officer Adams, who was
23 on his way to a Silver meeting."

24 My Lady, for your note, the Silver meeting was
25 scheduled to take place at 10.30.

1 "I assisted in readying an equipment dump and
2 notifying ADO Ginty of the need to relieve A24's crews
3 since they had been working on the train carriage for
4 over an hour. Shortly after, the crews of A241 and A242
5 [that's the two Soho crews] re-emerged at ground level
6 in a state of exhaustion. I spoke with the crew members
7 and enquired as to their welfare, instructing them to
8 sit away from the incident and to recover. At this
9 point, I was asked to board the Command Unit, which by
10 this time had arrived and been set up. I was asked to
11 operate the main scheme radio where I remained for
12 approximately an hour, at which point the incident was
13 downgraded and I returned to Soho station with the rest
14 of my crew."

15 My Lady, I don't propose, for the reasons I've
16 explained, to read the statement of Andrew Newton. May
17 I then read the statement of Simon Wilson, please, dated
18 9 September?

19 LADY JUSTICE HALLETT: Just before you do, Mr Keith, it's
20 probably my fault because I agreed which statements
21 would be read and which witnesses called, I'm just a bit
22 concerned, given some of the questioning yesterday, that
23 we have this statement read and not called Mr Roche. Is
24 somebody going to answer for the decisions?

25 MR KEITH: Mr Roche is unable to be here due to his medical

1 condition, hence his statement being read. Mr Newton,
2 who was also on that appliance, I hope to assure his
3 attendance so that he can give evidence orally and we
4 will be hearing from Firefighter Andrew Shaw in a moment
5 live. So I hope that we will have two available
6 firefighters from each of the two crews.

7 LADY JUSTICE HALLETT: It may be that it's going to be
8 covered by Command and Control anyway, because this
9 officer was obviously complying with necessary
10 procedures --

11 MR KEITH: Indeed.

12 LADY JUSTICE HALLETT: -- according to the London Fire
13 Brigade.

14 MR KEITH: It may be that the officer in command of A241,
15 Mr Colebrook-Taylor, will be able to deal with some
16 these issues as well and he will be a live witness for
17 the second appliance.

18 LADY JUSTICE HALLETT: I'm sorry, I had forgotten that
19 Mr Roche couldn't attend through medical reasons.

20 MR COLTART: My Lady, I'm sorry to rise and interrupt
21 Mr Keith's flow, but can I just raise an issue which
22 follows on really from the question which your Ladyship
23 has posed?

24 We are a little hampered in relation to this part of
25 the evidence. We are very sympathetic, of course, to

1 Mr Roche's position and we don't seek to drag him here
2 if he is not well enough to do so.

3 Mr Wilson, also, isn't coming. He was the driver of
4 the appliance and, as we shall see as the evidence
5 unfolds this morning, he had some significant
6 communications that morning, not only through his radio,
7 but also over his mobile phone, which perhaps we would
8 have chosen ideally to explore with him.

9 We are left in a position where we may need to
10 explore some of these issues through the live witnesses
11 who are coming. We might seek your indulgence in
12 relation to that. But also it's very important, in our
13 submission, that the court understands the full extent
14 to which we say the London Fire Brigade mobilisation
15 policy failed on this particular morning and, in order
16 to deal with that fully, it will be necessary to deal
17 with the chronology of events in a little more detail
18 than we have up until now.

19 There are two ways of doing that. There's the
20 correct way, which is to deal with it through a number
21 of different witnesses, some of whom will come today,
22 some of whom will come next week, some of whom might not
23 come until February, but it's very difficult to pull
24 those strands together, or we can deal with it through
25 one of the witnesses this morning.

1 I had proposed to deal with it through Mr Shaw, who
2 I think will be the first live witness to give evidence,
3 but Ms Boyd has reservations about that. He is,
4 I think, quite a junior firefighter and she just felt it
5 wasn't appropriate to deal with it through him and I can
6 understand that. But I may seek to deal with it through
7 Mr Colebrook-Taylor, who is the second witness to be
8 called, who is a more senior officer.

9 LADY JUSTICE HALLETT: Is it as difficult as you say? Why
10 can't we perfectly sensibly establish the time line,
11 which doesn't seem to be in doubt, does it?

12 MR COLTART: There are some inaccuracies in the document
13 which --

14 LADY JUSTICE HALLETT: Subject to any necessary exploration
15 of inconsistencies with witnesses who could help. But
16 establishing the time line shouldn't be too difficult,
17 as best we can, and then, as far as Mr Roche's statement
18 is concerned, it seemed as if, from reading it, that he
19 was following London Fire Brigade protocols.

20 Now, if that is the area that you wish to explore,
21 why isn't it perfectly sensible to explore that with
22 Command and Control? Why do we need to explore London
23 Fire Brigade protocols that led Mr Roche to behave as he
24 did with relatively junior firefighters who aren't
25 responsible for the protocols and may not even know the

1 policy behind them?

2 MR COLTART: Sorry, it's my fault, we might be marginally at
3 cross-purposes. I'm not proposing to explore the
4 breathing apparatus protocol through the witnesses who
5 attend this morning. I agree that's something which
6 should be dealt with in February.

7 I was proposing to deal with the mobilisation issue
8 as to which appliances were sent, where and why and how
9 often that mistake was repeated, which led to the delay
10 in sufficient fire engines arriving at King's Cross such
11 that crews could then be committed into the tunnel.

12 LADY JUSTICE HALLETT: Firefighter Smith, say, who is on
13 appliance 123, can't help you as to why appliances have
14 been sent to Euston Square. That is something surely
15 that we need to explore, again perhaps through Command
16 and Control, because you're going to suggest there was
17 almost a systemic problem that the wrong messages were
18 getting through and appliances were being deployed to
19 the wrong places? Isn't that really what you're talking
20 about?

21 MR COLTART: I am. The difficulty is that it's interspersed
22 with factual evidence which could be given by these
23 witnesses about phone calls which they made.

24 LADY JUSTICE HALLETT: Right.

25 MR COLTART: Mr Colebrook-Taylor, for example -- can I give

1 my Ladyship an example in the hope that this assists?
2 Mr Colebrook-Taylor's fire engine was deployed at
3 09.39 by the London Fire Brigade central office. By
4 that point in time, several opportunities had already
5 been and gone for the London Fire Brigade to understand
6 that the fire engines were needed at King's Cross and
7 not Euston Square.

8 In fact, his fire engine was still being committed
9 and deployed to Euston Square at 09.39. But for the
10 fact that one of his officers had spoken by mobile phone
11 with Mr Wilson on the appliance which was already at
12 King's Cross, that's where they would have gone, and it
13 was only by that happy chance, that the two officers had
14 spoken to each other, that Mr Colebrook-Taylor knew to
15 attend at King's Cross.

16 So it's difficult, as ever, as we've experienced
17 previously, to divorce entirely the generic issues from
18 what was actually happening on the day, and what I was
19 proposing to do through Mr Colebrook-Taylor was to draw
20 together some of those strands in the hope that it was
21 of assistance rather than you receiving the evidence
22 piecemeal over a more significant period of time.

23 LADY JUSTICE HALLETT: I think as long as you limit it
24 really to, as it were, taking me to the parts of the
25 evidence which you say are then going to go to what you

1 may claim are systemic issues, I don't think there ought
2 to be a problem. But shall we see how we go?

3 MR COLTART: Yes, of course.

4 LADY JUSTICE HALLETT: I hope I haven't set a hare running.
5 Ms Boyd, I appreciate this is very much within your
6 sphere. Do you see a problem with what Mr Coltart is
7 now describing?

8 MS BOYD: My Lady, so long as it's limited, because
9 mobilisation is clearly an issue in this scene and
10 that's very much acknowledged and appreciated and, with
11 that in mind, we prepared and disclosed a 20-page
12 statement by Mr Alan Paynton dealing generally with the
13 whole topic of mobilisation and specifically with all
14 the scenes and, in particular, King's Cross.

15 LADY JUSTICE HALLETT: Right.

16 MS BOYD: That was disclosed in advance of this scene so
17 that everyone could understand the background. But it
18 was clear that it was meant to be part of the generic
19 issues which are to be dealt with in February. So that
20 anything that went wrong that needs to be explained with
21 mobilisation, it would be more appropriate, we say, to
22 be dealt with with Command and Control. But if there
23 are any factual issues -- for instance, phone calls
24 between Firefighter Wilson, the driver of 242, and the
25 driver of 241 -- then clearly that can be adduced

1 through these witnesses.

2 But these witnesses will not be able to answer to
3 questions about why appliances were still being sent to
4 Euston Square, because that's a mobilisation issue.

5 LADY JUSTICE HALLETT: Indeed. Am I right in thinking that
6 because Mr Roche, sadly, couldn't attend that, as I read
7 his statement, as I said, he was applying a protocol and
8 that will be explained by others under Command and
9 Control?

10 MS BOYD: My Lady, indeed, yes.

11 LADY JUSTICE HALLETT: Thank you. Right, Mr Keith, let's
12 see how we go. We'll obviously give Mr Coltart
13 a certain amount of leeway, but I suspect you're going
14 to be laying down the time line, in any event.

15 MR KEITH: Absolutely. May I say that Mr Paynton's
16 statement has been disclosed to the interested persons.
17 In particular, it deals in some detail -- and he was the
18 head of mobilising at the time -- with the difficulties
19 associated with split attendance, because there was
20 a list of preselected addresses that the control room
21 had to use when receiving a report of an incident at
22 London Underground, and the actual address in the system
23 superseded any actual address provided by the person
24 reporting in, and so a level of confusion was then
25 entered into the system where there was a split

1 attendance, in particular, between different
2 London Underground stations.

3 LADY JUSTICE HALLETT: So if the message comes in "Attend
4 King's Cross station", the system may say "Attend
5 Smith Road".

6 MR KEITH: Precisely, because there are 30 to 40 preselected
7 addresses in the system. Now, I think, the system has
8 been altered so that the actual reporting address goes
9 into the mobilising message, but in 2005, it didn't.

10 LADY JUSTICE HALLETT: I follow. Thank you.

11 MR KEITH: The next statement I propose to read is
12 Simon Wilson.

13 Statement of MR SIMON WILSON read

14 "I am employed by the London Fire & Emergency
15 Planning Authority as a firefighter and I have been so
16 for the past 13 years. Throughout my service, I have
17 been stationed at Soho fire station, Shaftesbury Avenue.
18 On Thursday, 7 July, I was working my second day shift
19 duty. I commenced my tour of duty at 9.00 am and the
20 shift finishes at 6.00. At 9.04 that day, I was the
21 driver of appliance A242 with Leading Firefighter Roche
22 and Firefighters Shaw and Newton. We were answering
23 a call to smoke in the tunnels at King's Cross Tube
24 station. We were the second attending vehicle, the main
25 body of machines attending Euston Tube station.

1 "Traffic was heavy, and it took us about ten minutes
2 to get to the incident, and book status 3. This books
3 our arrival at the incident with the control room."
4 My Lady, I won't take you through the MOBIS report
5 again:
6 "On our arrival, nothing appeared untoward. The
7 street and surrounding area of the Tube appeared as any
8 other day, with the usual amount of people in vehicles.
9 Leading Firefighter Roche took one crew to the control
10 room to try to establish exactly what had happened. As
11 driver, it is my responsibility to stay with the
12 appliance and monitor any messages from Control. At
13 about 09.16, I saw members of the public emerging from
14 the Underground station. The appliance was parked just
15 past the entrance to the Tube station. I could see that
16 the members of the public had black, smoky deposits
17 around their faces. At this, I asked a member of the
18 Underground staff what had happened and was told that
19 there had been a power surge.
20 "I, myself, put in a call for additional appliances
21 to assist. However, at this point, it was not clear
22 what exactly had happened. There was a further call put
23 in for eight appliances [that's the pump 8 call] as the
24 information being fed back was to the effect that this
25 was a serious incident of some sort. At 09.35 [my Lady

1 knows that it is in fact 09.42] Sub-Officer
2 Colebrook-Taylor arrived with Firefighters Collins,
3 Jackson and Cook with appliance A241. This took over as
4 the base pump and I donned my breathing apparatus and
5 along with Leading Firefighter Roche carried a Holmatro
6 cutting equipment set to the top of the escalators.
7 "Having been briefed myself, Leading Firefighters
8 Roche and Jackson and myself made our way down to the
9 Tube train and tunnel where we believed the incident had
10 occurred. Leading Firefighter Roche was with us to try
11 to make an assessment of what exactly had happened.
12 Tube staff were saying there was a power surge and
13 different members of the public were talking of an
14 explosion. It still was not clear what exactly had
15 happened.
16 "Some members of the public were talking of body
17 parts and this gave us an indication that there was some
18 kind of major incident. I also heard over the radio
19 that they had adopted major incident procedures for
20 Aldgate and Edgware Road, so it was becoming a little
21 clearer the scale of the job in hand. We got down to
22 the platform and began to walk along the tunnel towards
23 the train itself.
24 "All the relevant procedures in relation to the
25 power being out had been carried out from a health and

1 safety point of view. We walked about 200 yards along
2 the tunnel, which had, by now, got some smoke in it. It
3 was dark, smoky and warm. We did not need our breathing
4 apparatus at this point. We were passing people who
5 were injured and telling them to make their way back to
6 the platform.

7 "As we got to the Tube, it was clear that we would
8 not be able to walk at the side of it, so we managed to
9 board it and had to walk through the train from carriage
10 to carriage to get to the front.

11 "At this point, most people had made their way back
12 to the platform. There was an odd person or two sat in
13 carriages who had minor injuries. The first carriage of
14 the train was where the seriously injured people seemed
15 to be. By the time we got on to this carriage, the time
16 was about 09.45.

17 "There was some smoke, but nothing too serious, so
18 we took off our breathing apparatus sets. There were
19 one or two Tube station staff there and a medic who was
20 prioritising the casualties.

21 "Leading Firefighter Jackson and myself helped
22 a young girl who was not too badly injured and sat her
23 down in the doorway. She had a leg injury. She was in
24 her early 20s. We then set up the cutting gear in the
25 second carriage and removed the door on the first

1 carriage, which was between the first and the second
2 carriages. This door, although open, was buckled and
3 hindering people's exits. We also smashed a couple of
4 windows to allow some of the heat to escape. It was
5 still quite dark in the carriage and we only had our
6 handheld torches at this point.

7 "There were various people trying to help in this
8 carriage. There were about 20 bodies still in the
9 carriage. Some of them were dead, having been totally
10 mutilated, and some of these, about six, were still
11 alive.

12 "We had to move bodies and body parts out of the way
13 to get to the people who were still conscious. The
14 medics (I cannot say if they were doctors or nurses)
15 were distinguishing between the people who were still
16 alive and those who were dead. Considering the
17 situation, the atmosphere at this point was relatively
18 calm. There was no screaming or shouting. People who
19 were alive or barely conscious and having lost so much
20 blood were fairly quiet. Conditions in the carriage
21 were very hot and cramped. It was slippery underfoot.

22 "We were shortly joined by Sub-Officer
23 Colebrook-Taylor and Firefighters Cook, Shaw, Newton and
24 Collins and we all set about moving the dead to get
25 a clear route for the casualties we could still save.

1 "The first casualty we got on to a stretcher was
2 a lad from the north-east. He did not appear to be too
3 badly injured and was conscious and talking to us
4 coherently. We removed bodies and debris from around
5 him and released one of his legs which was trapped under
6 a seat.

7 "The actual carriage I could see, once we had moved
8 some of the bodies, had damage to the floor where it had
9 buckled and the panels had come away from the interior.
10 There was damage to the ceiling and roof of the train
11 and there were windows blown out. I believe that some
12 casualties had been blown out of the windows. We gave
13 assistance to a gentleman in a suit who had lost both
14 his legs. Initially, he was conscious, but after we
15 removed the bodies that were on top of him, he quickly
16 went into shock and lost consciousness. By this time,
17 there were doctors on the scene and I spent the
18 remainder of my time working with Sub-Officer
19 Colebrook-Taylor and Firefighter Cook. We managed to
20 release a further four casualties and place them on
21 stretchers, mostly with lower limb damage. The last
22 casualty we released was a gentleman missing one of his
23 legs.

24 "It is difficult for me to be more specific about
25 the casualties I assisted. After the last casualty was

1 evacuated from the carriage, myself and the crew I was
2 with were relieved by Sub-Officer Johnson and his crew
3 from Westminster. By this time, it was about 11.00. We
4 made our way back to the platform finally up the
5 escalators and out of the station and I made my way back
6 to Soho station with the other officers."

7 My Lady, may I invite you to call Andrew Shaw,
8 please?

9 MR ANDREW SHAW (sworn)

10 Questions by MR KEITH

11 MR KEITH: Good morning.

12 A. Good morning.

13 Q. Could you give the court your full name, please.

14 A. It's Andrew Shaw.

15 Q. Mr Shaw, in 2005, were you a firefighter with the Soho
16 London Fire Brigade station and assigned to pump A242,
17 Alpha 242?

18 A. Yes, I was, yes.

19 Q. We've heard that the leading firefighter in charge was
20 Mr Roche, and you had also Firefighter Wilson and
21 Firefighter Newton.

22 A. That's correct, yes.

23 Q. I won't trouble you with the times, because her Ladyship
24 has heard them, and you've been sitting in the back of
25 court, so you will recall, no doubt, the times of your

1 mobilisation.

2 Were you aware from the mobilisation that this was

3 a split attendance?

4 A. In hindsight, yes, I would have been, but -- yes, I was

5 just aware that we was going King's Cross.

6 Q. Did you know that fellow firefighters had been assigned

7 to Euston?

8 A. I would be guessing if I could say for definite.

9 Q. All right.

10 En route, did you put on your breathing apparatus?

11 A. Yes.

12 Q. Why was that?

13 A. It was -- it wasn't procedure, but it's just what you

14 tended to do just to save yourself some time when you

15 got there.

16 Q. So that, when you arrived, you could go straight to

17 where the point of the problem is?

18 A. Yes.

19 Q. Did Firefighter Newton also put on his apparatus?

20 A. Yes.

21 Q. When you arrived at 9.13, could you see people leaving

22 the station and emerging on to the concourse at the

23 front?

24 A. Yes, yes.

25 Q. Did you get out straightaway?

1 A. I would assume so, yes, but as I say, it's a long time
2 ago, I can't ...

3 Q. One of you would have remained with the appliance?

4 A. That would have been Simon Wilson, yes, the driver.

5 Q. Is that because somebody has to stay and stay on the
6 radio and relay messages?

7 A. Yes, especially as we were the only machine there, we
8 need someone to listen to the radio.

9 Q. You were the first to arrive?

10 A. Yes.

11 Q. Did you go somewhere straightaway in order to try to
12 find out what was going on?

13 A. We would have all gone down to the concourse, myself,
14 the leading firefighter and Andrew Newton, just to try
15 to evaluate the situation.

16 Q. To the main booking hall?

17 A. Yes.

18 Q. There is a control room off the booking hall?

19 A. That's right.

20 Q. Did you go there?

21 A. That's where you always go, yes.

22 Q. Do you remember who was in it?

23 A. No.

24 Q. Did you speak to anybody there?

25 A. Not from my recollection, no.

1 Q. Your statement, dated much nearer the events in
2 question -- November 2005 -- records how you thought
3 that there was no information coming from the
4 London Underground staff?

5 A. Yes.

6 Q. So may we take it that certainly, when you made your
7 statement, you had recalled that there was a shortage of
8 information, but that you had asked for it?

9 A. The three of us would have gone to the control room and,
10 obviously, you just hear what other people are saying
11 and you just are unaware of the -- what had actually
12 happened until we got down to the platform level, so
13 nothing was coming back from the Control staff at all.

14 Q. When you were in the booking hall, you could see
15 passengers coming up the escalators, could you not?

16 A. That's right, yes.

17 Q. So you knew that the problem was down below, somewhere
18 near the platforms --

19 A. Yes.

20 Q. -- either in the tunnel or on the platform?

21 A. Yes.

22 Q. Did you ask the officer in charge -- that's Leading
23 Firefighter Roche -- whether you could go down to the
24 platforms?

25 A. Yes, to assess it better, yes.

1 Q. What was his response?

2 A. That we just couldn't do it because we was on our own.

3 Q. Because you were the only single appliance there?

4 A. That's right, yes.

5 Q. What was the problem, as far as you perceived it, if you

6 had gone down? Did you understand his reasoning?

7 A. Totally, totally, yes. We still wanted to go down, but

8 we was aware that there was smoke coming from a tunnel,

9 which you assume there's a fire down there.

10 For two people to go down on their own with just

11 their BA equipment, you're not really going to get much

12 done. So I understand why you need support.

13 Q. Is there a danger that, if you go down on your own, that

14 you could yourselves become casualties and there would

15 then be no firefighters to assist you?

16 A. Exactly, yes.

17 Q. Because Leading Firefighter Roche has to stay somewhere

18 in semi-command at the booking hall area --

19 A. That's right.

20 Q. -- and Mr Wilson is in the appliance?

21 A. That's correct, yes.

22 Q. There is an impression in the statements, I should say,

23 Mr Shaw, that you and Mr Newton may have asked Leading

24 Firefighter Roche several times whether you could go

25 have gone down.

1 A. Yes.

2 Q. Was that in reflection of what you could see was a real
3 emergency and a rapidly evolving scenario?

4 A. There's obviously smoke down there, and there's
5 obviously people that need help. You kind of feel a bit
6 useless when you're standing around not doing much. So,
7 yes, you want to assess the situation and you want to
8 just continue with the job.

9 Q. How many times did you ask?

10 A. I don't know.

11 Q. Repeatedly?

12 A. Yes, yes, from memory, yes.

13 Q. But Leading Firefighter Roche stuck to his guns?

14 A. Exactly, yes.

15 Q. He said "No" each time?

16 A. Yes.

17 Q. Was he able to call anybody, do you recall, and find out
18 whether or not an exception could be made or whether, on
19 this occasion, you could go down, despite the usual
20 protocol?

21 A. I wouldn't have thought he would have done that. I know
22 at one point he did say, "Just go to the bottom of the
23 escalators".

24 Q. That's a little later?

25 A. That's a little later, yes.

1 Q. But when you were first in the booking hall and seeing
2 passengers coming up?

3 A. I'm unaware that he would have done that or did do that.

4 Q. So despite the fact that there was an emergency call and
5 you had mobilised as quickly as you could and, as you
6 always do, you had mobilised very quickly, and you'd
7 arrived as quickly as you could, none of you went down
8 the escalators when you first arrived?

9 A. No.

10 Q. Instead, you and Mr Newton went back to the surface to
11 give first aid to the passengers who had already
12 emerged?

13 A. I will be honest, I can't actually remember doing that,
14 but --

15 Q. That's what your statement records.

16 A. -- my statement was done nearer the time, yes.

17 Q. Do you have any recollection of Mr Roche asking for two
18 additional pumps because of the smoke inhalation that
19 passengers were plainly suffering from?

20 A. I think he actually asked me to do it because the radio
21 communications were so bad, so I went up and asked
22 Simon Wilson.

23 Q. In what way were they bad?

24 A. Just -- you just couldn't get any radio traffic, you
25 couldn't hear each other.

1 Q. Is that because, although there was a carrier wave,
2 there were so many messages being passed around that you
3 couldn't get into it?

4 A. To be honest, I think it's just the poor radios we had
5 at the time.

6 Q. Was that a frequent occurrence, that you would try to
7 use a radio, even on an emergency, and you couldn't get
8 in?

9 A. Mainly on Undergrounds.

10 Q. But, of course, the appliance wasn't in the Underground;
11 it was parked outside King's Cross station.

12 A. Yes, but we were in the Underground.

13 Q. You couldn't even make a radio call from the booking
14 hall?

15 A. Yes.

16 Q. When you say that you made the call, do you think then
17 that you must have gone out to the front of the station
18 and spoken to Mr Wilson to allow him to relay the
19 message from the cab radio?

20 A. Yes.

21 Q. Were there ever problems with the cab radio, as far as
22 you can recall?

23 A. On the day in question, due to the amount of radio
24 traffic, yes, we kind of -- sometimes when we are in
25 built up areas we have little blind spots. I don't know

1 if King's Cross is one of them, but there was a lot of
2 radio traffic that day so there were problems with it.

3 Q. So, Mr Shaw, you were unable to go below to investigate
4 the cause of the smoke, although it was obviously very
5 serious?

6 A. Yes.

7 Q. You were unable to radio up to your appliance. That
8 must have been, to use as neutral word as I can find,
9 deeply unsatisfactory.

10 A. Yes, yes, because you feel like you're not really doing
11 much.

12 Q. You helped, though, the passengers who had already
13 emerged, and then, did there come a time when you
14 persuaded Mr Roche to allow you and Mr Newton to go down
15 the escalators, but only as far as the platform, to find
16 out what was going on?

17 A. From memory, I seem to remember Aaron -- that's
18 Aaron Roche -- actually saying, "Don't go any further
19 than the bottom of the escalators". I don't know if
20 that was so that we were still in sight of upstairs or
21 whatever, but that's what he asked us to do.

22 Q. But you didn't stop at the bottom of the escalators?

23 A. No.

24 Q. Because your own judgment and your need to assist drove
25 you onto the platform?

1 A. Yes, smoke issuing is only ever going to come from
2 tunnels, so we went down to the platform.

3 Q. Did you meet a British Transport Police officer down
4 there?

5 A. According to my statement, yes, I did -- apparently
6 I met two. The one I actually remember is the second
7 one that I met. I can't really recall meeting the first
8 one.

9 Q. Do you remember his rank?

10 A. No.

11 Q. But did one or other of them give you some information
12 about the fact that there had been a train in the tunnel
13 and an incident on the train?

14 A. Yes, where the tunnels actually merged, he said there
15 was an incident there. It must have been him that
16 I asked if it could have been a collision; he was
17 unaware.

18 Q. So you didn't know that there had been an explosion?

19 A. No.

20 Q. Could you see smoke billowing out of the tunnels still?

21 A. No.

22 Q. Were passengers still coming out?

23 A. From my statement, we were in the wrong area anyway, we
24 didn't go to the right platform for some reason.

25 Q. There are two Piccadilly Line platforms.

1 A. Yes.

2 Q. Do you remember which one you went to?

3 A. The wrong one, initially.

4 Q. But both connected, in fact, to the westbound tunnel

5 because even the eastbound platform connects?

6 A. Where the tunnels merged, yes. I don't know why we went

7 to that one, but from the statement, that's where

8 I spoke to the British Transport Policeman.

9 Q. So you didn't find out from him what had happened; you

10 couldn't see smoke. Were passengers still coming onto

11 the platform?

12 A. Yes.

13 Q. So you knew you were roughly in the right place?

14 A. Oh yes, yes, we knew there had been an incident within

15 the tunnel.

16 Q. Was there some discussion about you not being allowed to

17 go further, that someone had left instructions to the

18 effect that no one was to go into the tunnel?

19 A. I don't recall that discussion, no. But that was what

20 was happening.

21 Q. While you were down there with Mr Newton, do you recall

22 some British Transport Police officers coming down the

23 escalators, going across the platform, and then just

24 jumping on to the tracks and walking into the tunnel?

25 A. No.

1 Q. He recalls some police officers going onto the line.
2 You don't remember that?
3 A. No. When you say "he recalls", the British Transport
4 Policeman?
5 Q. No, the statement of Mr Newton.
6 A. No, I don't.
7 Q. He refers, in fact, in his report to the London Fire
8 Brigade, to a degree of annoyance on his part that,
9 without protective gear, the three British Transport
10 Police officers just jumped onto the track and proceeded
11 straight into the tunnel.
12 A. Yes.
13 Q. You don't remember that?
14 A. No, I don't, no.
15 Q. You had been sent down to check what the source of the
16 smoke was, but you couldn't see the smoke. You didn't
17 know the source.
18 A. No.
19 Q. Then you went back up to report what little you had been
20 able to learn from the officer.
21 A. That's right, yes.
22 LADY JUSTICE HALLETT: Do you know whether there were
23 injuries by this time?
24 A. I think as we was watching people come up the escalator,
25 there were slight injuries and they seemed to be

1 progressing in their severity, but from recollection --

2 LADY JUSTICE HALLETT: The British Transport Police officers
3 hadn't told you?

4 A. The second -- I think I went upstairs to speak to
5 Aaron Roche to report our initial findings, that there
6 had been a collision within the tunnel. The second
7 British Transport Policeman I spoke to painted
8 a brighter picture of what was going on and that's when
9 I went and told Aaron. I think I went up again and told
10 Aaron, because of the lack of being able to use the
11 radio.

12 MR KEITH: Your statement does suggest that you spoke to
13 a BTP officer, then you went back to the control room,
14 spoke to Mr Roche, and then you went back to the
15 platform and spoke to a visibly distressed BTP officer?

16 A. That's the one that I actually remember.

17 Q. That second officer, do you recall his rank?

18 A. No.

19 Q. All right. He was plainly shocked, was he not, by what
20 he had discovered?

21 A. Yes.

22 Q. Did he tell you that there had been an explosion?

23 A. Yes.

24 Q. Did you gather that he had, himself, been down to the
25 train?

1 A. Yes, because he said he couldn't continue into the
2 carriage because of the amount of body parts and bodies.
3 Q. He hadn't had breathing apparatus, had he?
4 A. No.
5 Q. So he had been able to get into the carriage?
6 A. Even now, I don't even know if he went to the carriage
7 or he was actually on the train.
8 Q. But he talked about body parts so he must have been
9 there.
10 A. But he might have been a passenger on the train.
11 I don't know if he actually went down the tunnel to make
12 his way to the train.
13 Q. Well, he was visibly distressed.
14 A. Yes.
15 Q. Presumably by something that he had seen.
16 A. Yes.
17 Q. He talked of body parts.
18 A. Yes.
19 Q. Of not being able to go all the way into the first
20 carriage.
21 A. That's right, yes.
22 Q. So it seemed likely, didn't it, that he had been in or
23 very near to the bombed carriage?
24 A. Oh, yes, I don't -- yes, he'd definitely been on the
25 train, yes.

1 Q. He had had no breathing apparatus himself?
2 A. That's right.
3 Q. So he was a member of the emergency services who had
4 been able to get to the carriage and back.
5 A. Once again, I don't know if he'd got to the carriage and
6 back or was already on the train as a passenger, if you
7 like.
8 Q. All right. Well, he'd been able to get out of the
9 tunnel without respiratory problems.
10 A. Yes.
11 Q. So you then went back to the Control area again, no
12 doubt running by now?
13 A. Yes.
14 Q. You passed the information to Mr Roche, who then asked
15 for "pumps 8"?
16 A. Yes.
17 Q. By now, over 20 minutes had passed since the time of
18 your arrival at King's Cross.
19 A. Okay.
20 Q. You assisted other passengers up the escalators, didn't
21 you?
22 A. Yes.
23 Q. I think some of them were very distressed and more and
24 more injured by this stage?
25 A. Yes.

1 Q. You weren't able, were you, to go into the tunnel to go
2 down beyond the platforms until the second appliance had
3 arrived?

4 A. That's right, yes.

5 Q. The second appliance didn't arrive until 9.42, almost an
6 hour after the bomb?

7 A. Okay.

8 Q. When it arrived, were you able to go straight down to
9 the tunnel or was there some time spent setting out
10 generators on the platform level and discussing whether
11 or not you should use your breathing apparatus kits?

12 A. There would -- I remember taking equipment off of the
13 machines and taking it down, yes, when they arrived.

14 Q. You took the generators off the other appliance's --

15 A. According to my statement, yes.

16 Q. -- rear and you took them down?

17 A. Yes.

18 Q. Was that for the purposes of the cutting equipment?

19 A. Cutting equipment or lighting or whatever needed to be
20 used.

21 LADY JUSTICE HALLETT: Was that because your appliance
22 didn't have this equipment and, therefore, you had to
23 get it off the second appliance?

24 A. From my recollection, I really don't know.

25 MR KEITH: We've heard some evidence in relation to the

1 Aldgate scene that the generators are a four-man piece
2 of kit, they need to be carried by four people. Is that
3 right?

4 A. Yes.

5 Q. You're smiling faintly, is that because you had to use
6 fewer people to carry them or --

7 A. I looked at my statement and I said that I'd carried two
8 down. I can't imagine I did.

9 Q. Well, to be fair to you, you say most of the other Soho
10 crew members were carrying cutting gear. So it may be
11 that you were all carrying it together. You all went
12 down, did you not --

13 A. Yes.

14 Q. -- to the platforms, with your equipment? Then you took
15 off your breathing apparatus set?

16 A. And left it on the platform.

17 Q. Why had you not taken off your set earlier when you had
18 seen the British Transport Police officer on the
19 platform?

20 A. No idea. It was just on my back and I was comfortable
21 with it, so ...

22 Q. When you took your set off on the platform, you then
23 record in your statement how you then went back to the
24 surface again to try to request more medical assistance.

25 A. Okay.

1 Q. Why, do you recall, did you go back then? What was it
2 that led you to think that more medical assistance was
3 required?

4 A. I don't know, I don't know.

5 Q. When you got back up on this time, did you meet a senior
6 officer, an assistant divisional officer?

7 A. Yes.

8 Q. Do you recall his name by any chance?

9 A. No.

10 Q. If I gave you two names, would you recognise which one
11 it would be, which one it was?

12 A. Probably not.

13 Q. A Mr Ginty or a Mr Munns?

14 A. I wouldn't know them, I'm afraid.

15 Q. Do you recall Mr Newton going back up with you and
16 asking whether or not lines should be put down, wires
17 should be put down, so that ventilation could be brought
18 into the tunnel?

19 A. The only time I remember seeing Andrew Newton again was
20 when I was making my way to the train as he was making
21 his way out of the train.

22 Q. All right. When you got back up on this occasion, the
23 senior officer, assistant divisional officer, was there.
24 What did he ask you to do?

25 A. He asked me to go back on to the train -- I say back on

1 to the train. He asked me to go down there to see if
2 any dosimeters had gone off.

3 Q. What's a dosimeter?

4 A. A dosimeter is a little device we carry on us that
5 measures any radiation levels.

6 Q. Did you say to him, "Well, I've seen upwards of 100,
7 200, 300 passengers coming off the train and I've seen
8 a British Transport Police officer who's been to the
9 train. There doesn't appear to be much sign of
10 chemical, nuclear or radiological contamination"?

11 A. No, I didn't, no.

12 Q. He asked you to do this?

13 A. Yes.

14 Q. So where did you go?

15 A. I went -- that's when I passed -- I went back down to
16 the platform, made my way down the tunnel, that's where
17 I passed Andrew Newton and I made my way on to the
18 train.

19 Q. Do you recall whether or not you went on the back of the
20 train through the rear driver's cab or whether you
21 approached the train through the side tunnel, which
22 would have brought you out adjacent to the fourth
23 carriage and allowed you to enter through the side of
24 the carriage?

25 A. I went through the side. I seem to remember entering

1 into the third carriage. I don't remember walking past
2 the carriage.

3 Q. When you entered the carriage -- the carriage that you
4 entered, did you hear a voice asking for help?

5 A. Yes.

6 Q. Could you trace the source of that voice?

7 A. Yes, it was opposite -- on the door opposite to where
8 I entered, and I looked through the door and looked to
9 my left, and I think that's where the voice was coming
10 from.

11 Q. Could you look, please, at page [INQ10283-12]? You'll see
12 there, Mr Shaw, the junction. This is the westbound
13 track, but you'll see to the top of the diagram there is
14 a track coming off it, which is the crossover that leads
15 to the eastbound track.

16 You would have entered, therefore, by carriage 4,
17 probably?

18 A. Okay.

19 Q. If you entered that carriage 4, can you tell us, please,
20 where you think the female was whom you discovered?

21 A. You see, I remember looking through the door and looking
22 to my left and seeing a female, but going by this, that
23 would have meant I entered the train further up.

24 Q. Well, there were a number of people lying on the tracks,
25 or not on the tracks, in the gap between carriage 4 and

1 the tunnel wall. But it helps for our purposes if you
2 can confirm that she was on the other side of the
3 carriage that you entered?
4 A. Sorry, can I just confirm, where it actually says
5 "carriage 4", that's where the door is, isn't it?
6 Q. Yes.
7 A. That makes more sense, then, yes.
8 Q. You went on to carriage 4 and literally, on the other
9 side of the carriage, between the carriage and the
10 tunnel wall, was this lady?
11 A. Yes.
12 Q. How were you able to see her? Did you manage to get out
13 of the other side of the carriage or did you look
14 through the window?
15 A. No, I didn't.
16 Q. How did you see her?
17 A. I just literally looked down the platform -- sorry, down
18 the tunnel.
19 Q. Was there much of her that you could see from where you
20 were?
21 A. At the time -- sorry, I can't remember too much now, but
22 at the time, I could see there was someone down there
23 that needed help.
24 Q. So what did you do, realising that she needed help?
25 A. Looked, saw her, went back into the carriage to try to

1 get some help, get some medical assistance. I remember
2 telling -- I don't know if it was a paramedic or
3 a doctor, and --

4 Q. Was it somebody who was in paramedic or doctor's
5 uniform?

6 A. Yes, from recollection. Told him what I'd seen and
7 where the person was, and he -- I just assumed that he
8 dealt with it or followed it on.

9 Q. You'd been sent down to check whether or not the
10 dosimeter was activating?

11 A. That's right.

12 Q. You quickly realised there was nothing?

13 A. That's right.

14 Q. Did you go back up to your senior officer to say, "It's
15 not activated", or did you decide to stay down and help?

16 A. I decided to stay and help.

17 Q. Where did you go?

18 A. I just moved further along the train into carriage 3,
19 and then on to carriage 2 where the help seemed to be
20 needed the most.

21 Q. Your fellow firefighters were there, weren't they?

22 A. Yes.

23 Q. So Sub-Officer Colebrook-Taylor was there,
24 Messrs Newton --

25 A. No.

1 Q. He wasn't?

2 A. No, like I say, on the way down to the train, I passed

3 Andy Newton, so --

4 Q. Where was he going?

5 A. Back up to platform level, I'm assuming.

6 Q. You didn't see him again at the train in the first

7 carriage?

8 A. Not from my recollection.

9 Q. Mr Roche, where was he? Was he still up at the control

10 room?

11 A. I'm -- I don't -- I am -- when I'm on the train,

12 although I know everybody was there, I can actually only

13 remember two or three people.

14 Q. Would they have been Colebrook-Taylor, Jackson?

15 A. Yes, there's certain people that I remember seeing and

16 certain people I just know were there. I don't remember

17 Aaron Roche being down there at all.

18 Q. There were two other members of A241 from whom we don't

19 have statements, I think they're called Cook and

20 Collins, were they there?

21 A. They were there, yes.

22 Q. Were you primarily concerned with helping the very badly

23 wounded out of the carriage by carrying them out,

24 stretchering them out and passing them down the line of

25 firefighters to the point of exit?

1 A. Yes.

2 Q. Do you recall there being a time when the doors were
3 taken off with cutting equipment? You heard me read the
4 statement of --

5 A. I wasn't. When that happened -- was that to gain access
6 to the train?

7 Q. To gain access to the train.

8 A. I wasn't there at that point.

9 Q. To gain access to the first carriage, the
10 interconnecting doors between the carriages 1 and 2?

11 A. That had already been done, I'm assuming, by the time
12 I got down there. I don't remember any cutting going
13 on.

14 Q. Do you remember there being shouts for more stretchers,
15 more medical equipment, more drips, anything of that
16 sort?

17 A. I don't remember anything, but I'm assuming that
18 happened.

19 Q. Did you go into the first carriage and assist in moving
20 some of the deceased passengers, in order to clear
21 a path for yourself and your colleagues to try to get to
22 the living?

23 A. Yes.

24 Q. No doubt, you moved the bodies with respect, and
25 carefully, and probably as little as you could, in order

1 to clear the minimum amount of space?

2 A. That's right, yes.

3 Q. Do you remember two bodies, and only two bodies, being
4 brought out of the first carriage and being placed at
5 the end of the second carriage?

6 A. No.

7 Q. I don't want to explore the detail, Mr Shaw, but was the
8 process of moving the deceased, carrying the living, and
9 negotiating your way round these appalling conditions
10 extraordinarily difficult?

11 A. Yes, yes, they were.

12 Q. One of the worst jobs you've ever had to do?

13 A. At the time, yes. Luckily, I can't really remember too
14 much about it, so ...

15 Q. Did you stay there, do you think, until all the living
16 casualties had been brought out?

17 A. Yes.

18 Q. So when you left, there was nobody else being brought
19 out on stretchers?

20 A. Not that I can recall, no.

21 Q. All the time that you were down there, did it just seem
22 to you that the two crews who were there -- there were
23 more than two crews, but the two appliance firefighters
24 who were there were those from Soho 241 and Soho 242?

25 A. Absolutely, yes.

1 MR KEITH: Will you stay there, please? There may be some
2 further questions for you.
3 A. Thank you.
4 LADY JUSTICE HALLETT: Mr Coltart?
5 Questions by MR COLTART
6 MR COLTART: Good morning, Mr Shaw.
7 Can I make one thing plain, please, before I ask you
8 a few questions, and there aren't very many, in fact?
9 Whatever criticisms there may be in due course on
10 behalf of the bereaved families of the London Fire
11 Brigade, those are directed at the systems which the
12 London Fire Brigade may have had in place at the time.
13 They are not intended, and they shouldn't be taken to
14 be, a personal criticism of you or any of your
15 colleagues who attended and worked under incredibly
16 difficult circumstances on that day. All right?
17 I know that you've had some difficulty recalling the
18 detail of what happened that day, for reasons which are
19 entirely understandable, and, in order to assist you,
20 I am, to an extent, going to use the contents of your
21 witness statement and one or two other documents to see
22 if we can prompt your memory a little as to detail.
23 If we can't, we can't, but we'll see how we go. All
24 right?
25 A. Okay.

1 Q. When you arrived with Mr Newton and Mr Wilson and
2 Mr Roche, and Mr Roche implemented the procedure in
3 relation to breathing apparatus, it was plainly
4 important, wasn't it, to ensure, through enquiry, that
5 that procedure was necessary?

6 A. Yes.

7 Q. Your first port of call, as I understand it, was to go
8 to the control room -- the London Underground control
9 room?

10 A. That's right.

11 Q. Where, because of the confusion which reigned in there,
12 it was difficult to ascertain any sensible information
13 as to whether there was a fire on this train or not, is
14 that right?

15 A. The term "power surge" was just constantly repeated by
16 everybody.

17 Q. Did any of you ask the London Underground staff what the
18 consequences of a power surge would be, in terms of fire
19 risk?

20 A. I didn't ask. I doubt if Andrew Newton would have
21 asked. Whether Aaron asked, I don't know.

22 LADY JUSTICE HALLETT: Had you ever heard of one before?

23 A. No, I don't think I had.

24 LADY JUSTICE HALLETT: I think most of us who were
25 passengers that morning hadn't heard it before.

1 A. Yes.

2 MR COLTART: You say in your statement:

3 "There was no information coming from
4 London Underground staff, so we asked Leading
5 Firefighter Roche if we could make our way to the
6 platform, but he refused due to poor radio communication
7 and no other emergency crews."

8 Just pausing there for a moment, when you first went
9 down -- forgive me, when he first made that observation
10 about the platform and that request was refused, were
11 there passengers milling about at the level at which you
12 were at, in respect of whom enquiries could have been
13 made about what was happening on the train?

14 A. Quite possibly, yes.

15 Q. Do you recall either yourself or any of your colleagues
16 making enquiries of these soot-covered passengers as to
17 what was the state of play on the carriage itself or the
18 train itself?

19 A. No, we didn't, and perhaps we should.

20 Q. It's a big room and I'm just going to ask you to keep
21 your voice up a little. We've got a transcript, but
22 it's much easier if we can hear it from you directly.

23 That microphone doesn't amplify, I'm afraid, it only
24 records. All right?

25 In any event, Firefighter Roche, having made that

1 decision that you couldn't be committed until other
2 crews turned up, it was imperative, wasn't it, at that
3 stage, that a message was got to your control room as
4 quickly as possible to get more fire engines to
5 King's Cross in order that you could then be committed?

6 A. Yes, or at least one, yes.

7 Q. At least one. So as you say in your statement:

8 "We made our way back to the surface for first aid
9 equipment ..."

10 In order, presumably, to render assistance to those
11 passengers who were arriving?

12 A. That's right, yes.

13 Q. "... and to order two additional pumps."

14 That was a conversation, can you recall, which
15 presumably took place with Mr Wilson, the driver of the
16 appliance?

17 A. That's who I would have asked, yes.

18 Q. It was his responsibility to get on the radio and make
19 that call?

20 A. Pretty much, yes.

21 Q. We know from the records which we have that that call
22 was made at 9.19. Did you ever ascertain, either that
23 morning at the time, or subsequently, that in fact the
24 request for those two further appliances was made but
25 they were sent also to Euston Square where the other

1 appliances had initially been sent?

2 A. Sorry, was I aware that that's what had happened, or ...

3 Q. Did you know that's what had happened?

4 A. At the time, no.

5 Q. In the context of what was happening that morning, that

6 was a disaster, wasn't it, frankly?

7 A. It was unfortunate, yes.

8 MR COLTART: My Lady, there is an error in the time line,

9 which perhaps we might as well correct now whilst we're

10 at it. We perceive it to be an error. In any event, we

11 invite any further observations people may have.

12 But if -- I don't know whether it's possible to get

13 our time line on the screen or whether my Lady has it to

14 hand. There we go, thank you. Could you turn through

15 to page 8 [INQ10430-8] for me, please?

16 Does my Lady see at the top of the page there's

17 reference to two further appliances, A431 and A421, at

18 09.32? These are the two appliances which were ordered

19 by Mr Wilson at 9.19. According to our time line, one

20 of them arrives at Euston Square and the other one

21 arrives at King's Cross at those times, 09.32 and 09.33.

22 As we now understand the position from Mr Paynton's

23 statement, which was recently disclosed to us, both of

24 those appliances, in fact, went to Euston Square. It

25 was only after they had arrived at Euston Square that

1 they were swiftly, it should be said, but nonetheless
2 redirected from Euston Square to King's Cross.
3 That can be checked, but if it's right, then the
4 time line ought to be amended to reflect that fact.

5 LADY JUSTICE HALLETT: Thank you.

6 MR KEITH: In fact, the MOBIS report shows that, after the
7 mobilisation call went out in respect of A421, there was
8 an order from the London Fire Brigade control room to
9 proceed to King's Cross at 09.33.45. I'm not sure it's
10 been established that that call came after A421 had
11 actually arrived at Euston, established from the
12 contemporaneous records of the mobilisation calls, but
13 we'll check.

14 MR COLTART: I'm sure we can iron this out between us in due
15 course.

16 LADY JUSTICE HALLETT: Certainly.

17 MR COLTART: That's the position as far as we understand the
18 evidence.

19 In any event, returning to your position, as you
20 found yourself on the day, you say that, after that call
21 had been made, yourself and Mr Newton made your way to
22 the bottom of the escalators for fact-finding only, and
23 this is where you had the meeting with the first BTP
24 officer who I think, in fairness to you, you say you
25 can't really recall at all?

1 A. No, no.

2 Q. What you said in your statement at the time, which was
3 made a few months after the event in November 2005 is
4 that he explained to you there had been an incident
5 involving a train where the tunnels merge. He did not
6 know if it might have been a collision. You went back
7 to the control room to report your findings, presumably
8 to Mr Roche?

9 A. It would have been, yes.

10 Q. Then:

11 "Myself and Mr Newton made our way to the platform
12 from which there was smoke coming and people were still
13 calmly evacuating and I could see that some people now
14 had more injuries and that the injuries were getting
15 more serious."

16 The position is getting ever more desperate. Was it
17 a source of great frustration at this stage that you
18 were unable to enter into the tunnel?

19 A. It was more a source of frustration we still didn't know
20 what had happened. That was what we had to ascertain
21 more than anything.

22 Q. Do you ever recall a discussion with Mr Newton that, at
23 this point, you were minded to enter the tunnel in any
24 event, notwithstanding the direction which you'd been
25 given by Mr Roche?

1 A. No.

2 Q. I'm going to ask you to look at -- can we have INQ9893,
3 please, on the screen?

4 I should say straightaway that this isn't your note.

5 All right? This is the note made by Mr Newton
6 immediately after the event. But it records, from his
7 perspective at least, the things that you were doing
8 together at the time. All right? The meetings that you
9 had, the people that you spoke to.

10 If you look at the bottom of that page --

11 MR KEITH: My Lady, I'm sorry to rise to my feet,
12 I understand what my learned friend is endeavouring to
13 do. One of the reasons why I have asked Mr Newton to
14 come to give live evidence is that there could, on one
15 argument, be some discrepancies between the report that
16 he prepared for the London Fire Brigade and his witness
17 statement.

18 It may be that, rather than putting to this witness
19 a report he's never seen before prepared by another
20 witness where that other witness's account may be open
21 to some questioning, if he comes to give evidence, might
22 be inappropriate.

23 MR COLTART: I have a number of observations to make about
24 that.

25 LADY JUSTICE HALLETT: Well, don't worry. You're entitled

1 to ask whether the witness recalls a discussion about
2 entering the tunnel. You may attempt to jog his memory
3 by reading out the passage. But I don't think we need
4 to have the document up on the screen. Let's just cut
5 to the chase and see whether or not he remembers
6 a discussion of that kind.

7 MR COLTART: Thank you very much. May I read out the
8 relevant parts? Thank you.

9 What Mr Newton says about this particular point in
10 time is that:

11 "We ran back down to the platform on the left where
12 people were still coming off the track and were debating
13 whether or not we should go down the tunnel. We decided
14 to walk down the tunnel, but we were held back by
15 someone who said a police officer had gone down to look,
16 and to wait, but as we waited, three police officers,
17 with no protection or equipment, jumped on the track and
18 went to the train, which annoyed me. We waited and
19 I got two extinguishers ready for use."

20 We will ask Mr Newton about this when he comes
21 because this is his note. But do you recall any
22 discussion with Mr Newton along those lines?

23 A. No, but I imagine we probably had quite a few
24 discussions about various plans that we -- you know, or
25 actions we should take. That would have been one of

1 them, possibly. I don't remember it.

2 Q. I'm going to read on, because it deals with his
3 recollection of your meeting them with the BTP officer
4 that you do recall.

5 A. So that discussion with Andy was before we met him, was
6 it?

7 Q. This is when you'd gone back down to the platform but
8 before you'd had the discussion with the officer that
9 you do recall, the one who was distressed.

10 A. Yes, okay.

11 Q. All right?

12 A. Yes.

13 Q. Then this is his note of that meeting that you had with
14 that officer. All right?

15 "People were coming out with more severe injuries,
16 so we helped people up the stairs with the worst
17 injuries. We were just about to go back down when the
18 police officer who had been down the tunnel pulled us to
19 one side and told me there had been an explosion, there
20 were body parts all over the track and at least 14
21 people dead, maybe more. But he could not get to the
22 front of the train."

23 Now, you mentioned a little while ago, in answer to
24 questions from Mr Keith, that the reason you recall him
25 giving was that there were too many bodies blocking the

1 way into that front carriage.

2 A. Yes.

3 Q. Do you recall him saying anything about the door to that
4 carriage, the interconnecting door being buckled and it
5 being very difficult to obtain access to the first
6 carriage?

7 A. Yes, I think I do now.

8 Q. So was it apparent to you, at that stage, that it may be
9 that your equipment was going to be required in order to
10 assist in the removal of that faulty door?

11 A. Yes.

12 Q. Then just carrying on in this statement:

13 "I asked them if there was a fire ..."

14 This is Mr Newton's note.

15 "I asked them if there was a fire and he said there
16 was no fire apparent, just smoke."

17 Now, that part doesn't appear in your witness
18 statement, but listening to that now, do you recall this
19 BTP inspector saying to you, "Actually, there isn't any
20 fire on the train even though there is some smoke"?

21 A. No, I clearly recall him saying that he tried and failed
22 to get into the first carriage. His reasons, as I put
23 in my statement, were because of the body parts and the
24 deceased. In hindsight, after you've mentioned it,
25 I can possibly recall him talking about the buckled

1 door. That's all I can remember him saying.

2 Q. All right. Then Mr Newton carries on:

3 "We ran up the escalator to find Mr Roche."

4 So the purpose of going to find Mr Roche presumably
5 was to report the latest intelligence which you had
6 received?

7 A. We've got a much clearer picture now and we needed to
8 let as many people know as possible.

9 Q. "We told him what we knew and he said not to go down the
10 tunnel until the backup crews had arrived."

11 So he was sticking to his guns and, no doubt, with
12 your best interests at heart, he wasn't prepared to
13 allow you down the tunnel, even in the light of that
14 information?

15 A. Yes.

16 LADY JUSTICE HALLETT: As a firefighter in an emergency
17 service which faces danger more than other emergency
18 services, is there a greater emphasis on discipline and
19 obeying orders?

20 You must often come across this situation. You
21 arrive at a fire. Do you have to have a greater
22 emphasis on -- is your training a greater emphasis on
23 discipline?

24 A. Yes, yes, there is the urge to want to just get in and
25 get on with it, but you have to sort of think of the

1 bigger picture sometimes, yes.

2 MR COLTART: In the event, Mr Colebrook-Taylor's appliance
3 arrived with Mr Jackson, Mr Collins and Mr Cook.

4 A. Yes.

5 Q. There was a decision made at that point that you were
6 all going to commit to the tunnel. You took off your
7 breathing apparatus, I think, at that point?

8 A. Yes, I think I done it on the platform, but ...

9 Q. Were you conscious at the time, or did you have any
10 discussions with your colleagues in the immediate
11 aftermath to the effect that all of them took off their
12 breathing apparatus, either on the way to the train or
13 as soon as they arrived at the carriage in question?

14 A. I would be guessing if I gave you an answer to that one.
15 I've no idea.

16 Q. You can't remember?

17 A. No, not at all.

18 Q. Just one final topic, if I may, and at the risk of
19 getting into further trouble with Mr Keith, can I just
20 refer you to one other thing in Mr Newton's witness
21 statement where he says:

22 "On my return to Soho fire station, at about 2.30
23 that afternoon, I debriefed", he says.

24 Now, do you recall any debrief taking place at the
25 fire station on the day that you returned?

1 A. I remember us all being in our dorm, as a watch, with
2 our ADO at the time, kind of discussing -- I don't know
3 whether it was a -- I wouldn't call it a debrief, more
4 of a chat about what had happened and what we was going
5 to do with the rest of the day, who to speak to and not
6 to speak to.

7 Q. Did you say with Aaron?

8 A. It would have been everyone at that point, all machines
9 and all personnel.

10 Q. With your radio at the time?

11 A. ADO.

12 Q. Oh, your ADO. I'm sorry. Who was that?

13 A. It was Andy Hearn.

14 Q. Can you recall now the watch that you had with you in
15 the dorm back at the station, did that include some of
16 those who had been sent to Euston?

17 A. It would have included both machines, yes. Everyone.

18 Q. There must have been some discussion, presumably, about
19 the unfortunate error which had been made sending some
20 of the crew to Euston Square where they weren't needed
21 at the time. Do you recall anything along those lines?

22 A. Not at all, not at all. I really do just remember being
23 in the room, more of a kind of "Let's get on with it
24 kind of thing", rather -- make sure everyone was all
25 right, rather than sort of analysing what had gone on

1 and what could have been done better.

2 Q. We know from other documents which we have received that
3 the Islington crews, who had attended -- I think they
4 arrived much later, didn't they, during the course of
5 the incident. Do you remember them being there?

6 A. I think we was already down on the train when everyone
7 else arrived, so ...

8 Q. Yes. As far as we understand it -- we'll hear some
9 evidence about this later -- they arrived pretty much at
10 the tail-end of the evacuation process at least on the
11 carriage. About a week after this incident, they were
12 put through a formal debriefing process where a room was
13 booked for them, they turned up, they went through
14 a whole list of things which had gone well, things which
15 hadn't gone so well, notes were made and we've had all
16 of that material disclosed to us.

17 A. Right.

18 Q. Do you recall the Soho crews ever being put through that
19 process?

20 A. Don't recall it, no.

21 Q. So you had been at the station for -- forgive me, at the
22 Tube station for some half an hour before anyone else
23 arrived. It was your crew's decision or Mr Roche's
24 decision to hold back until the other crews had come --

25 A. Yes.

1 Q. -- and all the ramifications which followed from that,
2 and the taking off of the door that was problematic and
3 everything, but no one sought your views later as to why
4 things had been done and how they'd gone and all the
5 rest of it?

6 A. Not that I can remember. They might well have done and
7 I might not have been there, but I cannot remember it at
8 all.

9 MR COLTART: All right. Thank you very much for your
10 assistance this morning.

11 LADY JUSTICE HALLETT: Mr Saunders?

12 Questions by MR SAUNDERS

13 MR SAUNDERS: Mr Shaw, I want to ask you about one specific
14 matter.

15 A. Okay.

16 Q. I'm not going to deal with all that you've just been
17 giving evidence about. It's when you enter on to the
18 Tube. You do so, we've heard evidence -- her Ladyship
19 has heard evidence already, if we can have up
20 [INQ10283-12], please. We know that there's an open door
21 on carriage number 4.

22 A. Yes.

23 Q. We've heard other witnesses who have given evidence to
24 accessing the Tube in that way. I think that's what you
25 now believe you've done.

1 To get into the carriage -- although at one stage
2 you thought it may have been carriage 3, you get on at
3 a carriage and I want to deal with what then happens.
4 I think it's right you hear a voice crying out for help?

5 A. Yes.

6 Q. Is it right, did you think it was a female or a male
7 voice?

8 A. In my statement, I've put female.

9 Q. You have.

10 A. I've always thought it was a male for some reason.

11 I just -- I don't know why.

12 Q. Forgive me, I missed that. You've always thought it was
13 a --

14 A. I've thought about it a lot and I've always, for some
15 reason, thought it was a male. Although my statement
16 was done there and then. So I don't know why.

17 Q. I quite understand. Her Ladyship has heard evidence
18 that there was a male, a young man by the name of
19 Lee Harris, who was on, as you can see on that
20 depiction, the other side, the tunnel wall side of the
21 Tube?

22 A. Okay.

23 Q. He is next to his long-time partner, Samantha Badham.
24 They are within a foot of each other, the other side of
25 the Tube as it were, and her Ladyship has heard a number

1 of witnesses saying that he, Lee Harris, was calling
2 out.

3 Can I just ask you about this: do you actually get
4 off the Tube on the other side or are you still on the
5 Tube looking down, as it were?

6 A. Still on the Tube looking down.

7 Q. So you obviously have an obstructed view, it's obviously
8 very poorly lit on that side, so you can't really say,
9 I think from your statement, who is actually there?

10 A. No.

11 Q. Because we heard yesterday -- you may well have seen or
12 read about it -- from a police constable, now an
13 inspector, called Johnson, who in fact had managed to
14 gain access to the other side and was with Lee and
15 Samantha at the trackside. But you can't remember now
16 how many people are there. What you have recalled is
17 somebody calling out?

18 A. I recall someone calling out. It really is dependent on
19 what door I came in at. If I came in on this door
20 here --

21 Q. You're pointing -- just so I can help her Ladyship,
22 you're pointing at what we believe to be --

23 A. Where it says "carriage", the "age" in "carriage".

24 Q. Can I help you in this way? If we look at -- I don't
25 want to upset you, Mr Shaw -- page 10 [INQ10283-10] of this same

1 section. This now is the carriage. There are two
2 double doors. D3, do you see, to the left --
3 A. Yes.
4 Q. -- and then D5 --
5 A. Yes.
6 Q. -- are two double doors?
7 A. Okay.
8 Q. One of those two is open going back to our plan. So one
9 of them, if we go back to page 12, you see that there is
10 a red spot where Lee Harris and Samantha Badham, they're
11 on the double door the other side.
12 A. Yes.
13 Q. So there are those two double doors there.
14 A. You see, I've always thought that I got on to the train
15 through the door, walked directly opposite and looked to
16 my left. It could be that I got on to the door, walked
17 up, heard the voice and then ...
18 So I really don't know whether it was Karolina or
19 Lee that I was looking at. But --
20 Q. There's no evidence that Karolina was at any point
21 talking or saying anything.
22 A. Okay.
23 Q. But the evidence that her Ladyship has heard is that
24 Samantha and Lee are alive and are removed still being
25 talked to. But you have described what you thought was

1 the woman who was seriously injured. You were able to
2 recall that?

3 A. I can recall looking and seeing someone that needed help
4 and then going back to try and --

5 Q. That's the point I wanted to come on to, Mr Shaw. It's
6 at that stage that you go and look and you can't now
7 remember whether it was a doctor or a paramedic but, as
8 it were, going for medical help --

9 A. Yes.

10 Q. -- as a result of what you've seen?

11 A. Yes.

12 MR SAUNDERS: Thank you very much, Mr Shaw. I don't ask you
13 anything else.

14 LADY JUSTICE HALLETT: Mr Patterson?

15 Questions by MR PATTERSON

16 MR PATTERSON: Two short topics, if I may.

17 Mr Shaw, first of all radios. You told Mr Keith
18 earlier this morning that at the time you regarded the
19 radios that you had as being poor when being used in an
20 Underground station.

21 A. Yes.

22 Q. So does it follow from that that this was a problem that
23 you had previously encountered before 7 July?

24 A. Oh, yes, any Underground, nine times out of ten, when we
25 were at any incident -- they're normally quite minor on

1 the Underground -- we ended up using LUL staff radios to
2 contact our own men that were in Control.

3 Q. You couldn't use your own radios, you had to borrow
4 radios?

5 A. Rarely.

6 Q. Did that apply just to communicating from down on a deep
7 platform, or did that also cover communicating from
8 perhaps higher up in booking halls and the like?

9 A. I can't imagine it would happen if you was on the same
10 level as someone, but I do -- yes, it was always from
11 platform level, you'd end up borrowing a radio off
12 someone.

13 Q. On this particular day, you said, even at the booking
14 hall level, you were unable to use the radio?

15 A. To get to ground level, yes.

16 Q. Finally this. You were asked about the distressed BTP
17 officer who spoke to you and to Mr Newton, and you were
18 asked questions by Mr Coltart based on Mr Newton's
19 recollection of it. But your own recollection of this,
20 from your statement made very much closer to the time,
21 was:

22 "He told us that he tried to make his way into the
23 first carriage but was unable to gain access due to the
24 damage, told us that there were numerous dead and many
25 body parts."

1 So although, as you rightly said, he referred to the
2 body parts, the actual reason for the inability to gain
3 access to the first carriage that he gave to you was the
4 damage.

5 A. Okay.

6 Q. You said in your statement that you relayed this on,
7 quite properly and immediately, to Mr Roche.

8 So having had your memory refreshed, is that right,
9 that the problem with the damage was made plain to
10 Mr Roche at the time?

11 A. If my statement says that, the words that stick in my
12 mind are the most graphic words. I don't know what
13 I said to Mr Roche, other than the fact that he couldn't
14 get into the other carriage.

15 MR PATTERSON: That's all I ask, thank you.

16 LADY JUSTICE HALLETT: Ms Boyd?

17 Questions by MS BOYD

18 MS BOYD: Mr Shaw, can I take you back to the beginning?
19 You arrived with your officer in charge of the
20 appliance?

21 A. Yes.

22 Q. Leading Firefighter Roche. You've told us that, on
23 going to the Underground control room, you were unable
24 to get any information, there was just talk of power
25 surges.

1 A. Yes, yes.

2 Q. Her Ladyship has already heard evidence from two
3 London Underground staff, a Mr Cook and Mr Chaudhury,
4 that they, in fact, had gone into the tunnel and on to
5 the train to investigate, but were unable to communicate
6 back to their control room because their radios didn't
7 work, in 2005, underground.

8 Certainly, one gets a sense that those
9 London Underground staff were sucked into the incident
10 before they were able to report back.

11 A. Yes.

12 Q. Because we know from the evidence of British Transport
13 Police that they, too, were unable to get any
14 information.

15 A. Okay.

16 Q. So that's the situation that faced you all, but in
17 particular Mr Roche, because he's in charge at that
18 point in time.

19 A. Yes.

20 Q. Is it also fair to say that the Fire Brigade, when you
21 go to an incident, are going to approach it slightly
22 differently from the police or indeed the LAS? Your
23 expertise is in firefighting.

24 A. Yes, or gaining access or --

25 Q. Or gaining access, indeed.

1 A. Yes.

2 Q. Is it fair to say, therefore, that, as the Fire Brigade,
3 the risk of a fire or the risk of a fire developing or
4 breaking out is going to be central to any risk
5 assessment?

6 A. Yes.

7 Q. We know that the only information Mr Roche had to go on
8 was "smoke in tunnel"?

9 A. That's right, yes.

10 Q. And passengers coming up the escalator with blackened
11 faces --

12 A. Indicating that.

13 Q. -- evidence of smoke inhalation?

14 A. Yes.

15 Q. It's for that reason that he wanted to investigate with
16 a breathing apparatus crew?

17 A. Yes.

18 Q. As you've explained -- and, indeed, Mr Roche has
19 explained in his statement that's been read to the
20 court -- there are certain set procedures that govern
21 the use of breathing apparatus?

22 A. That's right, yes.

23 Q. Firefighting can be very hazardous and potentially very
24 dangerous. Is that right?

25 A. Yes, yes.

1 Q. Is it also right, therefore, that there are numerous
2 operational notes governing different aspects of your
3 operations such as using breathing apparatus?

4 A. Yes, that's right, yes.

5 Q. When her Ladyship asked whether it was a disciplined
6 organisation and important to comply with orders, is
7 that right, it's very much at the heart?

8 A. Yes, I think we're all aware that you can make the
9 situation worse by just running headlong into it without
10 a plan.

11 Q. But you are human --

12 A. Yes.

13 Q. -- and, therefore, sometimes, is there a conflict
14 between you wanting to get stuck in but, on the other
15 hand, having to answer to your officer in charge and
16 comply with orders?

17 A. Absolutely, yes.

18 Q. Is that the sort of situation that you faced, that
19 Mr Roche was unable, because of procedures --
20 particularly, I think we're talking about use of
21 breathing apparatus at sub-surface. So he needed to
22 ensure that there was a backup crew and, therefore,
23 couldn't send you in?

24 A. Yes, and we understood that. We did keep asking if we
25 could go down. Eventually, he did and we went a little

1 bit further than he'd asked us, you know, allowed us to,
2 but we did understand why he was saying it, yes.

3 Q. But there is that conflict?

4 A. Yes, all the time.

5 Q. There's an order for good reason, but you want to get in
6 there?

7 A. Yes.

8 Q. Having made that assessment that a backup crew was
9 necessary, Mr Roche asks for the driver, Mr Wilson, to
10 send a message for two additional appliances.

11 A. Yes.

12 Q. We know from the MOBIS report that that's sent at 09.19.

13 A. Okay.

14 Q. You, having arrived at 09.13, having dismounted from
15 your appliance, having gone into the Underground, into
16 the concourse, had a conversation with the control room,
17 established that there was a lack of information,
18 a decision made by Mr Roche, need for backup, so within
19 six minutes that assessment is made and the additional
20 appliances are requested. Is that the timing of it?

21 A. You know the timings better than me. It's all a blur.

22 Q. Whilst you're waiting for the additional appliances,
23 you, with Mr Newton, go down the escalators to the
24 platform?

25 A. That's right, yes.

1 Q. So on a sort of fact-finding exercise?

2 A. Exactly that, yes.

3 Q. Mr Newton, in his statement, says that you made attempts
4 to go from the platform and into the tunnel but were
5 told to wait by police and an LUL member of staff as
6 other police officers had gone onto the track.

7 Do you remember that at all?

8 A. No, I don't.

9 Q. Because that would fit with other evidence we've heard.
10 An Inspector Mingay went into the train, onto the track
11 and into the train, but he instructed another BTP
12 officer and, indeed, an Underground member of staff to
13 stop anyone else entering the tunnel?

14 A. Okay.

15 Q. That's Mr Newton's evidence, you don't recall that?

16 A. It could be a conversation Mr Newton had with someone
17 when I was having a conversation with someone else, but
18 I don't recall it.

19 Q. But what you do recall, looking at your statement, is
20 you spoke to a BTP officer who had explained that there
21 had been an incident involving a train, but that's the
22 only information you got at that stage, and you went up
23 to convey that to Mr Roche?

24 A. That's right, yes.

25 Q. You come down again and it's when you're on the platform

1 the second time that you say that you saw a visibly
2 distressed officer who had been on to the train?

3 A. That's the one I remember, yes.

4 Q. We again know from the evidence we've heard that there
5 were only two British Transport Police officers who had
6 been on to the train using different routes. One was
7 Inspector Mingay and one was Sergeant McGrotty and they
8 both approached the train, roughly, we think, at similar
9 sort of times, but we think that Sergeant McGrotty was
10 slightly ahead of Inspector Mingay.

11 We do know that Inspector Mingay got back to the
12 rear of the train, having got into the bombed carriage
13 and walked back to the rear of the train by 09.28 and,
14 therefore, back to the platform presumably close to
15 09.30.

16 If he was slightly ahead of Mr McGrotty, it could
17 have been Inspector Mingay you spoke to?

18 A. It could have been, yes.

19 Q. On the other hand, you don't know this, but again, we've
20 heard evidence, it appears that Inspector Mingay got
21 into the carriage, he did gain access.

22 A. Right.

23 Q. Whereas Sergeant McGrotty has told us that he couldn't
24 gain access. So it's not clear which BTP officer you
25 had your conversation with, and obviously you can't help

1 us on that because you've never met either of them
2 before.

3 A. By what you've just said, I would say it would be the
4 Sergeant, because he told me he couldn't get in, so ...

5 Q. Right, so that would be no earlier than 09.30, possibly
6 a minute or two later?

7 A. Okay.

8 Q. You go up to Mr Roche and convey that to him and it's as
9 a result of that information that he makes pumps 8?

10 A. Yes.

11 Q. Indeed, that timing fits, because we know that he again
12 instructed Mr Wilson, the driver, to send that message
13 to make pumps 8 --

14 A. Okay.

15 Q. -- and we know from the MOBIS report that that
16 instruction order was made at 09.36 and, indeed,
17 Mr Wilson says in his statement he had some difficulty
18 getting through initially.

19 A. Yes.

20 Q. But the timing as I say, appears to fit.

21 Sub-Officer Colebrook-Taylor then arrives and he takes
22 command of the incident.

23 Is it right that, when he arrives, you go down with
24 Mr Newton, taking that equipment, or do you wait for
25 instructions from him?

1 A. I don't know. I remember taking equipment down there
2 once Alpha 241 had arrived, but I don't recall anything
3 bigger than that.

4 Q. I think Sub-Officer Colebrook-Taylor is going to say
5 that he instructed Mr Roche together with Mr Wilson and
6 Mr Jackson to go into the tunnel.

7 A. Okay.

8 Q. Indeed, Mr Roche says that, having got down to the
9 platform, he went ahead with Mr Jackson and Mr Wilson
10 and he says that he left you on the platform.

11 A. Right.

12 Q. Do you have any recollection of that?

13 A. I remember not going down with the initial crew.

14 Q. So you may have gone on ahead with Mr Newton, followed
15 by Mr Roche, Mr Jackson and Mr Wilson, who's been sent
16 down by Sub-Officer Colebrook-Taylor.

17 A. Yes.

18 Q. They go ahead into the tunnel?

19 A. Leaving us on the platform.

20 Q. And you wait on the platform. You say in your statement
21 that you then went upstairs on to the concourse to get
22 further medical assistance.

23 A. Yes.

24 Q. What prompted you to do that?

25 A. I'm just assuming at the time that's what needed to be

1 done. Like I say, if I hadn't read my statement,
2 I don't actually recall that.

3 Q. So you've really got no good, independent recollection
4 of events and the sequence of events?

5 A. No.

6 Q. Because you've attempted to block it presumably from
7 your mind?

8 A. I'm assuming that's what's happened, yes.

9 MS BOYD: Thank you very much, Mr Shaw.

10 LADY JUSTICE HALLETT: Any other questions for Mr Shaw?

11 That completes the questions we have for you,

12 Mr Shaw. We haven't dwelt on what you did in the

13 carriage and what happened to you in the carriage

14 because we haven't had to, but I've read your statement

15 and so I just want you to know that, whatever I may find

16 about the protocol that prevented you from going down to

17 the train for so long, when you did get down there, when

18 you were allowed to get down there, you obviously

19 carried out your duties as one would expect, and in the

20 most appalling conditions. I suspect you have tried to

21 suppress your memory of that day and I'm sorry I have

22 had to ask you to relive it.

23 A. That's okay, thank you.

24 MR KEITH: Thank you, my Lady. May I invite you to call

25 Adam Colebrook-Taylor, please?

1 LADY JUSTICE HALLETT: Mr Keith, I don't know if you wanted
2 a break or not, if you wanted a break, but --

3 MR KEITH: Could I invite my Lady to take a short break
4 after this witness, and then we will have Mr Jackson and
5 then the two final witnesses.

6 LADY JUSTICE HALLETT: Of course.

7 MR ADAM COLEBROOK-TAYLOR (sworn)

8 Questions by MR KEITH

9 MR KEITH: Good morning. Could you give the court your full
10 name, please?

11 A. Adam Colebrook-Taylor.

12 Q. In January 2005, were you promoted to being a temporary
13 sub-officer?

14 A. I was.

15 Q. In July, were you on duty at Soho London Fire Brigade
16 station?

17 A. I was.

18 Q. You were the officer in charge that day, were you not?

19 A. Correct, yes.

20 Q. I think you began to hear over the radio reports of
21 incidents occurring in London, in particular at
22 King's Cross. Were you aware that one of your
23 appliances was already attending King's Cross incident?

24 A. I was aware of other incidences happening. The
25 actual -- Alpha 242 actually got called at just gone

1 9.00, after we'd had roll call, so I was aware that one
2 of the machines at the station I was in charge of had
3 gone to King's Cross.

4 Q. Was your appliance -- the appliance which you were in
5 charge of -- then subsequently mobilised to attend
6 King's Cross?

7 A. At a much later date. We did have a call prior to that
8 one.

9 Q. Where was your prior call to?

10 A. That was to a fire alarm actuating at Euston Road.

11 Q. Could we have, please, on the screen [LFB11-20] ? Your
12 appliance was Alpha 241, was it not?

13 A. Correct.

14 Q. Mobilised 09.37, mobile 09.39, arrived 09.42.
15 So were you actually mobilised from Soho or from the
16 first call?

17 A. No, we was mobilised en route back from the first call.

18 Q. You arrived at King's Cross at 09.42.37 then?

19 A. Yes.

20 Q. When I say "arrived", the evidence is, I think, that
21 your appliance became so immersed in traffic that you
22 all decamped carrying your equipment and ran down the
23 Euston Road?

24 A. For a short distance, yes, we did.

25 Q. Carrying your breathing apparatus sets?

1 A. Yes.

2 Q. When you arrived, there were members of the public
3 emerging from the Underground station. Were you aware
4 that a major incident had been declared?

5 A. Only by the -- I suppose, answer: no. Only because of
6 other things that were happening on the radio at the
7 time and, to be totally honest, when we got to
8 King's Cross it was -- it wasn't like a normal rush hour
9 King's Cross day, because it was quite quiet than the
10 normal.

11 Q. But the appearance of the passengers and the way in
12 which they were soot-stained and increasing injuries --

13 A. When I arrived with Alpha 241, the majority of them
14 passengers had already been taken elsewhere to be
15 triaged or to be looked after.

16 Q. Right. Leading Firefighter Roche was there, was he not?

17 A. He was, yes.

18 Q. No doubt, you spoke to him to try to find out what he
19 had already been able to establish?

20 A. That's correct, yes.

21 Q. Which was not very much, because he hadn't received much
22 information from the London Underground?

23 A. That's true, yes. He met me outside the station.

24 Q. Did you go to the station control room to try to find
25 out what was going on?

1 A. Yes, we did.

2 Q. Before you went there, did you instruct any of your
3 firefighters to go straight down the escalators to the
4 platform or beyond to the track?

5 A. No, the crew I was with, I basically told them to follow
6 me to the main concourse, which is where the main
7 control room was.

8 Q. In the control room, did you find out that the power had
9 been switched off?

10 A. Yes, it was one of the questions I asked the station
11 manager of the LUL station.

12 Q. Did you try to find out what the nature of the incident
13 was?

14 A. I did. I questioned the -- who I gathered was the
15 station managers, to ask what had happened. He informed
16 me that he was of the understanding that there had been
17 a power surge. I then informed him that, due to the
18 evidence I'd had that there had been incidences at two
19 other railway -- Tube stations that maybe that wasn't
20 the case, but he couldn't clarify that.

21 Q. As a result of what you discovered, did you then try to
22 request the attendance of a Fire Rescue Unit?

23 A. I did, yes.

24 Q. Your statement records how you requested such an
25 attendance and you instructed your driver to liaise with

1 other appliances and to make the first one that
2 thereafter attended an Incident Command pump.

3 A. I did.

4 Q. Have you been able to look at the MOBIS documentation to
5 see whether or not that call by you is on it?

6 A. I haven't.

7 Q. You haven't. All right. We may be assisted in due
8 course, but for our part we're unable to find that call
9 on the records.

10 So what did you do?

11 A. After liaising with the station manager, I spoke with
12 Leading Firefighter Roche and, as far as I'm aware,
13 I asked him if he could go down the escalator to make an
14 assessment of exactly what had happened so we can make
15 a decision on what equipment was needed, more personnel
16 was needed, and what procedures we could put into place.

17 Q. Were you aware that Leading Firefighter Roche's
18 appliance and crew had been awaiting the arrival of
19 a second crew -- namely, your own -- before they could
20 consider it appropriate to release their firefighters to
21 go down to the track?

22 A. I wasn't, no.

23 Q. When you arrived, did you realise that no one had been
24 down to the track at all?

25 A. I just took it on board that I'd asked Leading

1 Firefighter Roche to make that assessment. So as far as
2 in my timescale of things, he would have been the first
3 person who had made that assessment.

4 Q. When you arrived, did he tell you, "Look, I haven't been
5 able to send anyone down to the track because it would
6 have meant them being isolated and I didn't have enough
7 firefighters to be able to do that and I was waiting for
8 you to arrive"?

9 A. On the day, I don't remember that conversation actually
10 taking place.

11 Q. Do you remember speaking to a British Transport Police
12 officer?

13 A. I do, at the top of the escalator, because as far as I'm
14 aware, he came up the escalator with Firefighter Shaw
15 and, at that point, we spoke and he gave me a more
16 in-depth account of what he believed had happened and
17 what, maybe, resources we needed.

18 Q. Was he quite distressed?

19 A. He was absolutely exhausted, yes, and distressed of
20 course, yes.

21 Q. Was he an inspector, do you remember?

22 A. Of the rank, I'm afraid I couldn't clarify that.

23 Q. As a result of what he told you, did you then make
24 a request to the London Ambulance Service staff who were
25 there for more medical assistance?

1 A. I was aware of -- by the ticket turnstiles, I was aware
2 of an ambulance person doing some first aid to a member
3 of the public, so I asked them if they could make --
4 request assistance of further paramedics, ambulance
5 staff, which they said they would try and do.

6 Q. By this stage, were there other senior officers or was
7 there a more senior officer, divisional officer, present
8 at King's Cross?

9 A. Not at that point. With the information that the
10 British Transport Policeman had given me, saying that it
11 may have been a train crash or maybe an explosion,
12 that's where we decided -- and Firefighter Shaw had
13 ensured me that breathing apparatus wasn't required,
14 that's where we decided on getting the cutting gear
15 ready to take down.

16 Q. But not to go down just yet?

17 A. At that point, I do believe I decided to commit them
18 after doing a quick risk assessment of what was needed.
19 Being informed there was no fire and, also, at the back
20 of my mind knowing that there was people down there,
21 I decided that it maybe was time to start sending people
22 down to the platform level and beyond.

23 Q. Were you aware that by now -- which must have been after
24 quarter to 10, maybe 10 to 10 -- a whole hour had
25 elapsed from the time of the incident, whatever it was?

1 A. I don't think the timescale prompted me to do anything.
2 I think it was just, with the information I'd had by
3 then, I think it was -- we could then relax the protocol
4 or the procedures that had been implemented.

5 Q. Your statement refers to you liaising with an assistant
6 divisional officer, Mr Munns, from Clerkenwell station.

7 A. Yes.

8 Q. Do you recall liaising with him before you made the
9 decision to start sending firefighters down with cutting
10 equipment?

11 A. No, I think I made the assessment to send them down, and
12 then, at that point, I made my way back to the control
13 room, and that's where I was aware that a more senior
14 officer had come to the incident and he basically asked
15 me what plan I had put into place, and that's when
16 I informed him that I had sent people down with cutting
17 gear to go and assess the situation.

18 Q. Into the tunnel or just onto the platform?

19 A. On to the train.

20 Q. On to the train?

21 A. Yes.

22 Q. He agreed with your assessment and your plan?

23 A. Yes, and at that point he said to me that he was going
24 to take over the incident, being the more senior, and
25 that I was to then liaise with Firefighter Roche and

1 take, I suppose, command of the main scene.

2 Q. I think there is some reference to you becoming formally
3 Bronze Underground or Bronze --

4 A. I wasn't --

5 Q. You don't recall that?

6 A. No.

7 Q. All right. You then went down with your fellow
8 firefighters and you went to the train?

9 A. Yes.

10 Q. When you reached the train, members of
11 London Underground staff were treating injured people
12 inside the carriages, were they not?

13 A. They were.

14 Q. Your fellow firefighters, the ones you had sent down
15 with the cutting equipment, had reached the first
16 carriage, the bombed carriage, hadn't they?

17 A. Yes, because, as far as I'm aware, Leading
18 Firefighter Jackson was one of the ones I sent down and
19 if I recall correctly, he met me -- as I was walking
20 towards the train, he actually met me just before
21 I entered the train, to give me a brief picture of what
22 was happening. And I also passed Firefighter Newton on
23 the way towards this train as well, who was coming back
24 towards the platform.

25 Q. Did you ascertain from them that they had used their

1 cutting equipment and had actually taken off a door
2 between the first and second carriage?

3 A. The only thing I recall, I was still given information
4 that it was still difficult getting into the carriage,
5 for whatever reason, because it was the doors or because
6 of what was beyond the doors.

7 Q. Do you recall, though, when you reached the carriage,
8 the doors being taken off with cutting equipment?

9 If you didn't, then it may be that it happened
10 before --

11 A. I can't be 100 per cent, but then I'm not aware of that
12 happening, so I would say that had already been done by
13 the time I got to the --

14 Q. So you think you might have met Firefighters Jackson and
15 Newton? They had returned, or were returning from
16 having taken off the doors with their cutting equipment?

17 A. I believe that I had met Firefighter Jackson, who had
18 come out -- I think he'd come out to try to find me to
19 give the information, once the door had been taken off.

20 Q. When you reached the first carriage, did you and your
21 colleagues become involved in the process of assisting
22 the paramedics to move the deceased passengers, to help
23 with the living casualties and to start moving them out?

24 A. Initially, it was -- as far as I'm aware, it was just
25 the crews from Soho who were on this train at the

1 moment. The amount of paramedics was -- the only one
2 I remember, there was one guy who was doing the
3 prioritising the casualties. He's the only one
4 I remember at the initial stages of actually entering
5 that carriage.

6 Q. Was that because he was right at the end of the carriage
7 where you were?

8 A. Yes, because we'd already entered the carriage and he
9 was, like, making his way in after us, so he actually
10 passed us, because I remember seeing him and thinking,
11 "At least we've got a paramedic here now".

12 Q. Do you recall members of London Underground staff
13 further down the carriage doing what they could for the
14 passengers? We know there were a number of them in
15 there.

16 A. 100 per cent, no. I think -- trying to remember,
17 I remember -- I can visualise people being at the far
18 end of the carriage. Who they were, I -- but if you're
19 telling me they were LUL, then, yes.

20 Q. Did there come a time when you discussed with
21 London Underground -- with the London Ambulance Service
22 who would give the directions as to who would be moved,
23 who would be treated, and the order in which people
24 would be brought out of the carriage?

25 A. Yes, after -- I think we'd released maybe two or three

1 of the still living casualties and, at that point, I was
2 aware of a doctor actually coming into the carriage.
3 I had a real quick chat with him to say, "Look, you
4 know, now you're here, we will work to your command, you
5 tell us who you think we need to release first", and we
6 would work on his command as such.

7 Q. The terrible process of moving those passengers who
8 could not be helped to one side to allow access to those
9 who could be helped continued?

10 A. It did, yes.

11 Q. It's important that I ask you this. Did you -- and your
12 statement records that you did -- use your best care and
13 dignity to move the deceased passengers to allow access
14 to the living?

15 A. We did.

16 Q. Do you recall that two were brought out of the first
17 carriage and placed carefully at the end of the second
18 carriage?

19 A. I'm not fully aware of that.

20 Q. I'm not going to ask you about the extent of the damage
21 to the carriage, other than to invite you to agree that
22 the conditions in that carriage in which you worked were
23 absolutely appalling.

24 A. They were.

25 Q. You, I think, were obliged to try to count the number of

1 casualties.

2 A. At some point during this extrication process, a senior
3 officer did make himself aware to me and asked me if I
4 can make a rough estimate of the amount of people
5 involved.

6 Q. Did you do that?

7 A. A very rough estimate, yes.

8 Q. Was there a rather -- an even more extraordinary moment
9 when you found a lady in the middle of the carriage who
10 was surrounded by dead bodies but was herself alive,
11 although very severely injured, and you found her
12 sitting there in the middle of the carriage unmoving and
13 silent and discovered her, as I say, surrounded by
14 others?

15 A. I think she was probably one of a couple that we found
16 in that sort of situation, yes.

17 Q. Were there very real difficulties in getting passengers
18 out of the first carriage through the doors and into the
19 second carriage and then down the train?

20 A. I'll be -- I had my back to the doors, so the job of
21 getting people onto stretchers -- to be honest, what was
22 happening behind me was totally -- I was totally
23 oblivious to it. I was more trying to free the people,
24 pass them back to the stretchers, and then they were
25 being dealt with by taking them back. Whether there was

1 problems getting through that door, I wasn't really sure
2 of.

3 Q. You were, therefore, directly concerned in lifting and
4 carrying passengers and getting them to the end of the
5 carriage where they could be put on stretchers?

6 A. To the end of the first carriage?

7 Q. To the end of the first carriage?

8 A. Yes.

9 Q. You had to, presumably, crawl your way and negotiate
10 your way through the deceased passengers to get to the
11 living?

12 A. We walked our way, yes. The crew we had, yes.

13 Q. Did you stay there until the end of the process when the
14 living casualties had been brought out when firefighters
15 from Westminster took over your position?

16 A. We did, yes.

17 MR KEITH: I'm not going to ask you about the details of the
18 persons and the deceased bodies that you discovered in
19 the carriage. Others may. But for my part, thank you,
20 Mr Colebrook-Taylor.

21 LADY JUSTICE HALLETT: Mr Coltart?

22 MR COLTART: My Lady, may I say that on mature reflection --
23 which has been something of a novel sensation -- I'm not
24 proposing to explore the detail of the chronology
25 through Mr Colebrook-Taylor? That can wait

1 until February and, in particular, perhaps, when
2 Mr Paynton comes to give his evidence. There are just
3 one or two bits and pieces from the MOBIS documentation
4 that I'd like to ask him about.

5 LADY JUSTICE HALLETT: How long, do you think? It's just
6 that I know that we do try to give the break.

7 Mr Colebrook-Taylor, any problems? As long as we finish
8 you by lunchtime, are you okay to stay with us until
9 lunchtime?

10 A. Yes.

11 LADY JUSTICE HALLETT: You're not required somewhere else?
12 I think probably, Mr Coltart, it might be better for the
13 stenographers, because I have to, I'm afraid, adjourn
14 promptly at 1.00 today, so it's not as if I can then go
15 into afterwards. So we'll take -- shall we just take
16 a ten-minute break?

17 MR COLTART: Thank you.

18 (11.55 am)

19 (A short break)

20 (12.05 pm)

21 LADY JUSTICE HALLETT: Mr Coltart?

22 Questions by MR COLTART

23 MR COLTART: Good morning.

24 I want to ask you, if I may, a few questions to
25 begin with about events before you arrived at

1 King's Cross that morning. We know that you arrived
2 around about 9.40, something of that order.
3 But do you recall a little earlier than that,
4 perhaps 10 or 15 minutes earlier than that, a telephone
5 conversation which you had with Simon Wilson over
6 a mobile phone? Does that ring any bells?
7 A. I think I briefly spoke to him because of -- we was
8 aware of there being a communication problem.
9 Q. Can I assist you in this exercise? For my Lady's note,
10 I'm looking at INQ9895-2. This is a report that
11 Simon Wilson prepared on 25 July setting out what he did
12 on that day, a sort of precursor for the witness
13 statement that was later taken from him.
14 He says this, he sets out a chronology on the face
15 of that document, and he said:
16 "At 09.30, Firefighter Cook ..."
17 Now, that was someone on your fire engine, wasn't
18 it --
19 A. Yes.
20 Q. -- when you were dispatched to the scene?
21 "... Firefighter Cook phoned me by mobile to ask me
22 what was happening and where we were. He passed me on
23 to Sub-Officer Colebrook-Taylor and I explained to him
24 that we may have a serious incident."
25 So it was obvious to you, at that stage, and to

1 Mr Cook, indeed, that there was a serious issue at
2 King's Cross and that's where Mr Wilson was, he was at
3 King's Cross Underground station?

4 A. That's correct, yes.

5 Q. You were mobilised, in fact, a few minutes later. Can
6 we just have LFB11 back up on the screen, please?

7 Now, we know, and we've heard evidence already --
8 we're going to hear more in the future -- about the fact
9 that the initial response, the split attendance, was, in
10 fact, to send three fire engines to Euston Square
11 Underground station, where there was no problem, and
12 only one, Mr Roche's appliance, to King's Cross, and
13 again, at 09.19, when Mr Wilson speaks to the control
14 room, that resulted again in an automated mobilisation,
15 further appliances to Euston, rather than to
16 King's Cross.

17 At 09.39, if we can turn through to page 5 [LFB11-5], please,
18 of that document, do you see an entry there at the top
19 of the page, 09.13.16, A241 -- that was your appliance,
20 wasn't it on the day --

21 A. Yes.

22 Q. -- being committed along with a number of other fire
23 engines and, if we look at the entry a little further
24 down the page, at 09.39.19, you're then mobilised. If
25 we go down that page, the message, as it's been

1 throughout, is, in fact, to the eastbound

2 Piccadilly Line:

3 "Ordered additionally for manpower due to smoke

4 inhalation."

5 Then:

6 "Proceed to Euston Square station

7 London Underground."

8 So in fact, even then, at 09.39, the fire engines

9 which are being mobilised by the computerised system at

10 the control room were still being sent to Euston Square

11 Underground station rather than King's Cross.

12 A. If that's what the -- bearing in mind we don't get

13 a copy of this on the fire engine, on the appliance.

14 Q. No, I might come back to that point in a moment, if

15 I may. But as it happened, and by lucky chance, because

16 Mr Cook and Mr Wilson have spoken by mobile phone, you

17 know, don't you, that that information is incorrect and

18 your presence is required at King's Cross?

19 A. Yes, yes, of course, yes, because of the conversation

20 I'd had.

21 Q. Do you recall having a conversation with Mr Cook when

22 the mobilisation message came through to the effect

23 that, "Hang on a minute, we're being sent to

24 Euston Square, but we know that's not right, we need to

25 get to King's Cross"? Do you recall anything of that

1 nature?

2 A. I honestly don't remember that conversation because,
3 looking at that, I'm wondering -- I was thinking maybe,
4 because I knew it was to King's Cross, whether I wasn't
5 listening to the mobilisation properly and just knew --
6 I had it in my head King's Cross was where we should go
7 and that's why we went there.

8 If you're going to tell me that I did have
9 a conversation with him, then I must have, but I'm not
10 sure if I did or not.

11 Q. Assume nothing, Mr Colebrook-Taylor. I wish I was in
12 possession of that information but, sadly, I'm not.

13 A. But we did make our way to King's Cross.

14 Q. You made your way to King's Cross. This is the
15 computerised record that's since been produced for our
16 benefit and this is what we're all working from, but you
17 received something different, you tell us, at the
18 station.

19 What was it that you physically received? What
20 comes through --

21 A. Can I just go over --

22 Q. Yes.

23 A. We weren't at the station when we got the call, we were
24 still on the fire engine returning from another call.

25 So all this was done over the main scheme radio on the

1 appliance.

2 Q. Thank you.

3 LADY JUSTICE HALLETT: It was a fire alarm, I think,
4 Mr Colebrook-Taylor, was it, you said?

5 A. The first call I was sent on, yes, was a fire alarm.

6 MR COLTART: If you had been at the station, or for the
7 other engines which were at a fire station when this
8 mobilisation message came through, what would they
9 physically receive?

10 A. They would get a copy of that, what's on that screen now
11 from 09.39, that would be what they get sent through to
12 each station that is going on that call.

13 Q. Does it contain the same information that we see here?

14 A. It would contain everything that is in that larger box.

15 Q. So it would contain, for example, the information
16 about --

17 A. Starting from the "Mobilise" down to the "Risk: CRR".

18 Q. Can I just ask your help about something else, because
19 you've reminded me, in saying that you were on your way
20 back from another job -- if we go back to page 3,
21 please, of this document, and if we enlarge the middle
22 of that page, do you see, at 09.13, "PAS"? Do you
23 happen to know what that stands for?

24 A. I'm not --

25 Q. Don't worry. A242, so this is a message which purports

1 to come from Mr Roche's appliance.

2 "ICM incoming message. Code 4. Stop."

3 I anticipate that we'll hear in due course that the
4 control room thought, in error, that Mr Roche's
5 appliance had put a stop on their call after they had
6 arrived at King's Cross, and that would have the effect
7 of cancelling it, wouldn't it, effectively?

8 A. Of closing that incident, yes.

9 Q. Of closing that incident down. In fact, as we
10 understand it, that was your appliance's "stop" for the
11 incident which you had previously been attending?

12 A. That's correct.

13 Q. Were you aware of that at the time?

14 A. I was informed by my driver that he'd sent the stop from
15 the wrong machine and he was in the process of trying to
16 correct it, but the problem being, on that day, the
17 radio was so busy that he just couldn't -- because the
18 way our radio worked at that time was you could only
19 send a message when there was a clear air space and, of
20 course, because of what was going on, there was no clear
21 space for him to correct that error.

22 Q. So even by this time -- this is 9.15, only 25 minutes
23 after the bomb has gone off -- the radios were already
24 experiencing significant disruption, were they?

25 A. Yes, because although one of the other incidences, as

1 far as I'm aware, was using another radio channel
2 because it was in a different command, the Edgware Road
3 one was on the same radio channel as us. So a lot of
4 their messages were of a priority type, which over --
5 which took precedence over anyone else's.

6 Q. So even surface -- leave to one side for the moment the
7 question of surface to sub-surface radios. This is,
8 even at surface level, there was a problem with the
9 Fire Brigade radios?

10 A. The only problem being the amount of --

11 Q. Traffic?

12 A. -- traffic, not with the actual quality of the radio,
13 just with the amount of people trying to send messages
14 at the same -- at that initial half hour/hour of
15 everything going wrong.

16 Q. So if you're able to get on to the airwaves, there's no
17 problem with being heard, but the difficulty is getting
18 in, finding a slot?

19 A. Yes.

20 Q. But you say that your driver realised quite quickly that
21 he had pressed the wrong button, as it were, to send --

22 A. It was a verbal message that he'd sent.

23 Q. The verbal message. Because we see that the next entry
24 is at 09.19.46 on this page, which is the incoming
25 message from Mr Wilson. If we just go back to INQ9895

1 at page 2 [INQ9895-2]. In fact, can we get it up? There's nothing
2 controversial, I should add, on this page, but it might
3 assist with the chronology of it. I apologise for
4 dealing with this through you, but Mr Wilson is not
5 coming. If we look at 09.19, if we emphasise the middle
6 of the page, he says he requests two additional
7 appliances for manpower purposes:
8 "I sent this priority message and Control informed
9 me that a stop had already been received for this
10 incident."
11 So that was six minutes earlier at 09.13. So as far
12 as Control were concerned, Mr Wilson had closed down his
13 incident at King's Cross.
14 "I informed Control that there must be some sort of
15 mistake, as a stop had not been sent from A242 and we
16 needed two additional appliances."
17 So there was a six-minute delay in sending those
18 additional appliances or, in fairness, I suppose,
19 a six-minute delay in him getting through in that way:
20 "Control told me to contact the officer of the watch
21 by landline. Luckily, I had my mobile phone with me and
22 happened to know the number. I did this and once again
23 requested two more appliances, making a point of
24 confirming the address and explaining that we were the
25 secondary attendance."

1 As we understand it then, those were the engines
2 that were sent to Euston Square.
3 We'll hear later that the reason why that happened,
4 the reason why the appliances were sent to
5 Euston Square, was because, although Mr Wilson, on his
6 account, had plainly articulated himself clearly as to
7 where he was and what he wanted, it wasn't a formal,
8 informative message that had been sent to the control
9 room.

10 Just to assist us with this issue before we ask
11 people further down the line about it, what is an
12 informative message and what's different about it from
13 just telling someone over the phone where you are and
14 what you need?

15 A. An informative message is -- basically, what it's saying
16 is it's to pass on information from your incident via
17 Control so they know, and normally that message will
18 contain who the message is coming from, where you are,
19 the context of the message, so if it's an informative,
20 just, you know, what you're doing at that time.

21 We have different ranges of message. We have
22 informatives and we have an assistance-type message.
23 But the basics are the first initial one from a scene of
24 an incident would contain the officer's name and the
25 address of that incident.

1 Q. Where Mr Wilson says:

2 "I did this and once again requested two more
3 appliances, making a point of confirming the address and
4 explaining that we were the secondary attendance."

5 In other words, he was the single engine that had
6 been sent to King's Cross at the outset rather than the
7 three which had gone to Euston Square.

8 On the face of it, from your experience, what's the
9 difference between that and an informative message?

10 A. If he's given the address of where he is, apart from
11 maybe the order he's done it, because bearing in mind
12 the pressure that he's under, as long as it's got the
13 address in it, as far as I'm aware, there is no
14 difference. But, you know, we are taught to do it in
15 a prescribed order.

16 Q. So it may depend on whether the address is given at the
17 beginning rather than at the end of the conversation?

18 A. To me, it would not make a difference.

19 Q. Let's move on. We'll deal with that in greater detail
20 through others later. You arrive. Mr Roche presumably
21 relieved to see you. Can you recall how he was when you
22 got there?

23 A. He did say he was relieved to see us, yes.

24 Q. On his account -- and his evidence has been read out
25 this morning -- he was outside the station pacing up and

1 down the Euston Road waiting for the further appliances
2 to arrive. He says this in his report, in fact, rather
3 than his witness statement. Again, I don't need to take
4 to you it, but for my Lady's note, INQ9897-3.

5 "I began planning our response and arrival of
6 additional appliances ..."

7 This is after he's made pumps 8, all right:

8 "... and decided that a minimum four breathing
9 apparatus wearers would be needed to make a safe
10 assessment of the incident. I then went out and stood
11 on the Euston Road awaiting further appliances, to relay
12 the information I had and the plan I had formulated.

13 The timeframe is very unclear, due to the pressure I was
14 under, but I believe this was about 9.45."

15 So no doubt pleased to see you, and then you have
16 a discussion with him. Do you recall any discussion
17 with him when you first arrived?

18 A. The discussion is how it is on any incident. It was
19 more of a to gather the information that he'd already
20 got, to ascertain what the plan was that he'd wanted to
21 implement, or already implemented, and between the two,
22 it was a very informal, "I would now take over".

23 Q. Because you were the senior officer?

24 A. Because I was senior, yes.

25 Q. You're now in the position to call the shots, make the

1 decisions, and you receive information, as we understand
2 it, shortly after your arrival, from an officer from the
3 British Transport Police about the situation which is
4 faced on the carriage. You further receive information,
5 I think, from Mr Shaw, whom we heard from earlier, that
6 breathing apparatus, in his opinion, wasn't required.
7 You quickly deploy crews to the scene.

8 Did you recall having any discussion with Mr Roche
9 on the day as to how it was that you had both received
10 essentially the same information -- you've heard the
11 evidence that's been given this morning -- at about
12 9.30, Mr Shaw and Mr Newton, having spoken to the same
13 officer, it appears, that you're describing -- it may be
14 the same officer -- had gone and told Mr Roche that
15 there was no fire on the train and that there was
16 a difficulty getting through into the affected carriage.
17 That's the information he receives at 9.30.

18 You receive essentially the same information when
19 you arrive at about 9.45, by this point, we estimate.
20 Did you ever discuss with him later in the day how it
21 was that you had both come to quite different
22 conclusions based on the same evidence and the same
23 protocol that you were working under?

24 A. As a one-to-one, do you mean, with him, or just on the
25 debrief or --

1 Q. At any time, whether on the day, in the pub afterwards,
2 in the course of a formal debrief further down the line,
3 do you recall that issue ever being discussed?

4 A. I honestly can't, no. It was just a decision that
5 I made on the information that I was given, that was --
6 as you pointed out -- was different to his, but ...
7 Bearing in mind, although it was the same
8 information, you've now got a -- maybe a 15-minute gap
9 from the time he was told to when I was told.

10 LADY JUSTICE HALLETT: You also have another crew, don't
11 you, which of course Mr Roche didn't have.

12 MR COLTART: Yes, yes, of course.

13 A. It doesn't matter what information Leading
14 Firefighter Roche was given, the main problem was he
15 still only had, in total, three -- four firefighters,
16 one was upstairs, so although the information was the
17 same, the resources had now doubled.

18 Q. If, in fact, it had been established early on that there
19 was no fire on the train, it might have been a bit
20 smoky, but there was no fire on the train, and no
21 immediate risk of fire, as far as that could be
22 ascertained, would there have been anything to prevent
23 crews being committed immediately, even if they had been
24 the only crew to arrive?

25 A. Protocol is that we don't commit crews when

1 you're really with bare minimum. The reason behind that
2 is, if you send your only two crew down to an incident,
3 whether it be sub-surface, whether it be a high rise,
4 you've got no means of -- if they got into trouble, of
5 rescuing them. So it's always laid down that, you know,
6 you have to wait for a second crew.

7 And although the smoke issue, there are also the
8 CBRN, that may have been in the back of Aaron's mind,
9 that maybe I'd flitted over and made my decision
10 quicker.

11 Q. One of the vehicles which was mobilised at 09.36 when
12 Mr Roche made pumps 8 was a Fire Rescue Unit. As it
13 happens, all of the vehicles which were mobilised
14 following that request from him were again to be
15 deployed to Euston Square, although that was corrected,
16 in the end, quite quickly.

17 But what was the purpose of getting a Fire Rescue
18 Unit to the incident as quickly as possible?

19 A. I requested one when I arrived because I was informed
20 that it may have been a train collision, and bearing in
21 mind that a Fire Rescue Unit carries firefighters and it
22 has specialist equipment, one of them being cutting
23 equipment and access equipment. So that's why

24 I requested one because, if there had been a crash, then
25 we may need to, like, cut the carriage up, which they

1 had the specialist equipment. Most appliances carry
2 very basic cutting equipment.

3 Q. The cutting equipment that was used in the end to remove
4 the doors from this train was cutting equipment that was
5 taken from your appliance.

6 A. It was, yes.

7 Q. So there was no need for the specialist cutting
8 equipment from the Fire Rescue Unit. You had the
9 equipment --

10 A. In hindsight, of course, yes.

11 Q. Of course, and I'm not criticising you. But that same
12 cutting equipment that was used on your appliance, would
13 that also have been on Mr Roche's appliance? Is that
14 standard kit?

15 A. I believe at the time, no. Only pump ladders, which is
16 the rescue ladder, would carry that.

17 Q. So for all the reasons you've described, whether it's
18 the protocol and the need to have more crews there as
19 quickly as possible, or in order to get the correct
20 cutting equipment to the incident as soon as possible,
21 it was imperative, as we know, for more fire appliances
22 to arrive at King's Cross as quickly as possible?

23 A. More personnel.

24 Q. And more personnel?

25 A. More personnel more than fire appliances.

1 Q. One final topic, which is a short one, and I'm afraid it
2 does involve the evacuation of a particular casualty,
3 but it's of significance as far as my clients are
4 concerned, or it might be.

5 You say -- I'm going to take it, in fact, from your
6 report, if you don't mind, rather than your witness
7 statement, because you just cover it in a bit more
8 detail. Again, for my Lady's note, it's LFB56 -- no,
9 INQ9894, pages 2 to 4.

10 You say this:

11 "A middle-aged woman was found in the middle of the
12 carriage and at this point it appeared that this was the
13 centre of the explosion. Once again, the crew had the
14 task of moving what they could so that the London
15 Ambulance Service could do a thorough assessment of
16 her."

17 So have we understood this right, that this is
18 someone who's effectively been buried, is that right,
19 under a pile of other bodies, either dead or alive --
20 A. That's correct, yes.

21 Q. -- but who is found to be alive, mercifully, at that
22 stage?

23 "We were able to lift her on to a stretcher. Her
24 injuries included a partially severed left leg. She was
25 fully conscious when we managed to take her to the next

1 carriage."

2 Do you now have any independent recollection of this
3 particular evacuee, or is it impossible to say?

4 A. I remember getting the lady -- like, getting to a point
5 where we could pick her up and put her on the stretcher,
6 but from putting her on the stretcher to what happened
7 through the other carriage, I wasn't aware of.

8 Q. So you're not able to assist us as to whether, once she
9 was moved into the other carriage, she stayed there or
10 whether she was immediately then evacuated out of the
11 station?

12 A. I can't say, because, as I say, from what went on at the
13 entrance from carriage 1 to 2, really that was down to
14 whoever was in charge of that carriage, whether it be
15 police or ambulance or Fire Brigade.

16 MR COLTART: Just so that it's on the record, the
17 description, the further description, you give, in fact,
18 in your witness statement is that she was middle-aged
19 and had grey hair. That was the appearance which she
20 had at the time that you found her.

21 My Lady, only for the sake of completeness and
22 because we're not going to hear from this particular
23 witness, who's Firefighter Cook, he also makes reference
24 to the same woman:

25 "She was about 50 to 60 years' old. I thought she

1 looked like she would be all right. She was on
2 a stretcher. Her leg was badly injured and bent back
3 the wrong way and, when we tried to get out of the
4 carriage through the doors, her leg kept dangling over
5 the side of the stretcher and I replaced it a number
6 a times. I later saw this same lady on the platform and
7 found out that she had passed away."

8 Of course, it's not clear, necessarily, from that
9 statement whether that means she passed away on the
10 platform or whether she passed away subsequently. But
11 it may become important for my case that that's on the
12 record.

13 Thank you very much.

14 A. Thank you.

15 MR SAUNDERS: Nothing thank you, my Lady.

16 LADY JUSTICE HALLETT: Mr Patterson?

17 Questions by MR PATTERSON

18 MR PATTERSON: Two very short points.

19 First, Mr Colebrook-Taylor, having arrived at 09.42,
20 one of the first things that you sensibly did was to
21 speak to the London Underground staff in their control
22 room to learn what you could from them. You told us
23 that they told that you there had been a power surge.
24 Was that the extent of the information that you got from
25 the control room?

1 A. As far as I remember, yes, because it was quite sketchy,
2 and I -- they were having communication problems with
3 the staff that had been sent down, so, yes, the only
4 definite thing it was, it was a power surge.

5 Q. You said it was a station manager that you thought you
6 spoke to?

7 A. Yes, but I couldn't be 100 per cent it was the station
8 manager, but he was in the control room, which normally
9 is manned by that sort of level of LUL personnel.

10 Q. Although clearly it was sketchy and obviously there's
11 a lot of confusion and so forth, and that's perhaps to
12 be expected, but nobody in the London Underground
13 control room was able to tell you that there were
14 casualties in the train down in the tunnel. Is that
15 right?

16 A. Not at the time we arrived, no.

17 Q. This is now at about 9.45?

18 A. Yes.

19 Q. Secondly, this: you were asked about the protocol and
20 you've explained how you didn't see any protocol issues
21 that prevented you from quickly assessing the
22 information in front of you and ordering that your
23 officers should proceed.

24 It's not the case, however, is it, that in all
25 circumstances a first crew has to wait for the arrival

1 of a second crew?

2 A. It would depend on the type of incident you have been
3 called to, of course.

4 Q. Once you had made it clear in your own mind that there
5 was no breathing apparatus that was needed and minimum
6 smoke issues, you had no problem with proceeding in the
7 light of the existing protocol?

8 A. No, no problem at all.

9 Q. That was the one issue that had to be dealt with and,
10 once you very quickly dealt with it, you were happy for
11 your officers to proceed?

12 A. And once we clarified that there was no power still on
13 the actual track.

14 Q. Yes, and that was identified very quickly --

15 A. That was identified quite quickly, yes.

16 Q. -- in the control room.

17 Faced with that information, it rather sounds as
18 though the tenor of your view is that one crew alone
19 could proceed in those circumstances, given that there's
20 no need for breathing apparatus?

21 A. I would have waited -- in Leading Firefighter Roche's --
22 I would still have waited for another crew to turn up.

23 Q. Even though it's been identified that there's no actual
24 fire and that breathing apparatus isn't needed?

25 A. Yes, because, if I was in Leading Firefighter Roche's --

1 you see, I feel like you're trying to --

2 Q. I appreciate --

3 A. I feel like you're trying to get me to contradict what
4 he did. What he did, he did because that was the
5 correct procedure.

6 I suppose, if you're asking me, would I do the same,
7 I couldn't answer you, because I wasn't the first one
8 there, I was the second one there and I had a lot more
9 resources and --

10 Q. But, for you, the key issue was fire, smoke, breathing
11 apparatus and, once that was removed from your mind --

12 A. And the timescale, bearing in mind that I'd got there
13 later, so as far as I was aware, when I was given the
14 information, the situation hadn't deteriorated where
15 there was more smoke or there was obvious signs of
16 a chemical or CBRN incident. So I had the timescale,
17 which of course does count a lot for --

18 Q. Clearly these are judgment calls and these are important
19 decisions, but an important factor to weigh into this
20 decision-making process is the evidence in front of you
21 as to the scale of the emergency and the pressing nature
22 of the emergency to the many casualties down on the
23 train.

24 A. Yes.

25 Q. That certainly weighed heavily in your mind in your

1 decision, your quick decision, to order your officers to
2 proceed?

3 A. I suppose so, yes, because I knew there was people down
4 there and we were the ones who could help them.

5 Q. Of course. Finally, this. I'm asked about a further
6 issue which I'm happy to deal with and it's debriefing.

7 At any stage, were you asked to attend a debriefing
8 by the London Fire Brigade?

9 A. I was asked to attend a debrief for all -- which I was
10 aware of was for all Incident Commanders, so anyone who
11 during the incident had at some point taken control was
12 asked to go. This was not open to firefighters and
13 other members of the watch.

14 Q. Was it within the London Fire Brigade or was it beyond?

15 A. It was within the London Fire Brigade. It was only
16 officers, but, as I say, this is a thing that happened.

17 Q. I'm so sorry, this is a ...?

18 A. This is one of the procedures that we go through. There
19 normally is a debrief for personnel, but this didn't
20 happen, it was just officers.

21 Q. So there was one, it was for officers, and it was
22 a lessons to be learnt exercise?

23 A. No, because nothing ... How can I ... Normally, they
24 are, but no lessons were learnt because nothing came
25 back from it, and it is a thing that was dear to my

1 heart, that something should have, but for some reason
2 or other, it didn't happen.

3 MR PATTERSON: If others want to pursue that, I dare say
4 they will, thank you.

5 LADY JUSTICE HALLETT: I think I suspect Mr Coltart would
6 ask me to pursue it. I'm afraid I'm going to have to
7 press you. You felt there should have been a formal
8 debriefing of all those who had attended?

9 A. I do, and emails were sent to try and hurry this along.

10 LADY JUSTICE HALLETT: But for some reason --

11 A. Still waiting.

12 LADY JUSTICE HALLETT: Still waiting?

13 A. For an answer.

14 LADY JUSTICE HALLETT: Mr Coltart?

15 Further questions by MR COLTART

16 MR COLTART: Do you mind? Just in relation to the emails,
17 did you send emails?

18 A. I did.

19 Q. To whom did you send them?

20 A. Off the top of my head, without looking at my email
21 account, I wouldn't like to guess. I believe that
22 a Mr Collins -- I think his first name is
23 Nick Collins -- was one I sent it to.

24 LADY JUSTICE HALLETT: Are these just emails saying "I want
25 a debriefing" or are they emails that contain any kind

1 of feedback on lessons that might have been learnt or
2 what happened on the day, or are they just "I think we
3 need a formal debriefing for everyone"?

4 A. And asking why, at other incidents we'd been to, we'd
5 always had a debrief, but on this one we hadn't. And it
6 was just a question of why, and this was also passed on
7 to my line manager, who also pursued it.

8 MR COLTART: Who was your line manager?

9 A. Andy Hearn.

10 Q. Do you recall ever receiving a response in relation to
11 these emails?

12 A. From above my line manager, no.

13 MR COLTART: My Lady, could I ask this question and we'll
14 see where it takes us: how difficult a task would it be
15 for you now to interrogate your own email account and
16 retrieve those particular emails?

17 A. If I've still got them, they should be there.

18 LADY JUSTICE HALLETT: Are you likely to have them five
19 years later? I don't think I've got my emails from five
20 years ago. But anyway.

21 A. I don't delete many. So I may have.

22 MR COLTART: If it's not a difficult or time-consuming task,
23 and in the knowledge that they will be seen by the
24 Inquest team before being disclosed on any further --
25 and would only be disclosed if they were relevant in

1 some way, is my Lady prepared to ask that that task is
2 undertaken?

3 LADY JUSTICE HALLETT: If it's not going to cause you huge
4 problems, and you feel that it's worth checking, please
5 would you check and then just tell Mr Smith or the
6 Inquest team, or through Ms Boyd perhaps get the message
7 to us as to whether there's anything that might just
8 alert us to when you said "Why haven't we had
9 a debriefing?", and any response or lack of response.

10 A. Okay.

11 LADY JUSTICE HALLETT: Thank you.

12 MR COLTART: Thank you very much.

13 LADY JUSTICE HALLETT: Ms Canby?

14 Questions by MS CANBY

15 MS CANBY: Mr Colebrook-Taylor, just one short matter,
16 please, on behalf of Transport for London.

17 When you arrive, you receive your first briefing
18 from Leading Firefighter Roche and, as a result of that,
19 you are aware that a major incident has occurred and
20 that there are injured. Is that right?

21 A. That's correct.

22 Q. It is after speaking to Leading Firefighter Roche that
23 you then go down to the London Underground control room?

24 A. Yes.

25 Q. You told us that you've spoken to a member of staff

1 there who was unable to tell you anything other than
2 traction current was off and a power surge had occurred.
3 Do you know who it was you were speaking to, whether
4 or not it was a station supervisor or a manager?
5 A. I didn't actually ask his name or what rank he was.
6 Q. Can you recall whether or not he was wearing an orange
7 high visibility vest or a white one?
8 A. I wouldn't be able answer that, I'm afraid.
9 MS CANBY: Thank you very much.
10 LADY JUSTICE HALLETT: Ms Boyd?
11 Questions by MS BOYD
12 MS BOYD: My Lady.
13 Yes, can I just ask you a few questions to clarify
14 one or two matters? In relation to the debriefing you
15 talked about the Incident Commanders going to a debrief.
16 Are you talking about the PRC --
17 A. I am, yes.
18 Q. -- the performance review of command?
19 A. Yes.
20 Q. That's the debriefing that you went to?
21 A. Yes.
22 Q. But it's a source of upset to you that you didn't go to
23 any or wider debrief, is that right?
24 A. That's correct, yes.
25 Q. What you're saying is you asked for one but you didn't

1 get one?

2 A. Enquired about one. We had one on the station, on the
3 day, as has already been discussed, but the normal
4 process was to get as many of the crews to go so that
5 you can talk about -- and, also, it was a way of talking
6 about incidents, which sometimes helps the people who've
7 been on them, the watches and the personnel.

8 LADY JUSTICE HALLETT: Also, the firefighters might have
9 things to say about their officers.

10 A. Can I do a -- yes, yes, maybe. Good and bad.

11 LADY JUSTICE HALLETT: I'm sure mostly good.

12 MS BOYD: Can I now deal with the different scenarios? I'm
13 not going to take any time on this because there's been
14 a lot of questions already and a lot of evidence, but
15 the different scenarios facing Mr Roche and facing
16 yourself. Different information. Because you'd had the
17 information about the casualties on the train when you
18 arrived, which is what led Mr Roche to make it eight
19 pumps.

20 He was concerned with the issue of fire having been
21 called to a "smoke in tunnel", and you won't have heard
22 the evidence, but indeed, we heard from
23 Inspector Mingay, a BTP inspector, who did go on to the
24 train but he was also concerned about the issue of fire,
25 to the extent that he asked his colleague to stay at the

1 back of the train and not go with him because he was
2 concerned he might be overcome by smoke inhalation and
3 he therefore wanted somebody to be there so that, if he
4 didn't return within ten minutes, the alarm would be
5 raised.

6 So it looks as though Mr Roche wasn't the only one
7 who was concerned as to what was actually happening at
8 the front of that six-train Tube as we now know.

9 With the question of breathing apparatus, again, I'm
10 not going to ask you about the detail of the procedures
11 that govern that, but is it right that the background to
12 this particular operational note is that there were two
13 very serious incidents where breathing apparatus crews
14 were lost and tragically died? Are you aware of that?

15 A. During the --

16 Q. During an incident?

17 A. Of course, yes.

18 Q. Therefore, it's vitally important for some control over
19 crews that go in, because they're on a limited amount of
20 air and somebody needs to know where they are, be able
21 to communicate and know that they can get back out
22 within the timescale of that limited air?

23 A. And also to have the resources that then, if that crew
24 got into trouble, you could commit more crews to rescue
25 those, yes.

1 Q. Mr Roche didn't know what situation he was faced with
2 and, as you've said, he only had three officers with
3 him?

4 A. That's correct.

5 Q. Can I also just clarify with you your mobilisation and
6 the timings there?

7 You have you've told us at the beginning of your
8 shift at 09.00 you were called to an automated fire
9 alarm incident.

10 A. It was approximately -- it was a bit later than 09.00.
11 It was after the Alpha 242 had already been committed
12 to --

13 Q. They'd already been committed. I'm sorry. I've got the
14 timing right.

15 A. They'd already gone in, we got a call, it was one to two
16 minutes after that.

17 Q. There was no incident, so you asked one of your crew --
18 in fact, I think it was Firefighter Collins -- to send
19 a code 4 stop message, which would have the effect of
20 telling Control that the incident is at an end. Is that
21 right?

22 A. That's correct.

23 Q. No more resources were required?

24 A. Correct.

25 Q. As you've told us, you then discovered that, in fact, he

1 had used the wrong call sign. Presumably, you alternate
2 in the appliances, you --

3 A. You do, you don't always ride the same appliance, and it
4 has happened before in the past, but on a normal day you
5 can correct it within 30 seconds of --

6 Q. So it's an easy mistake to make, but you've said the
7 radio was very busy, it wasn't the quality. You
8 mentioned, is it right, that the main scheme radio is
9 divided into three areas, geographically?

10 A. Yes.

11 Q. So you've mentioned that, in fact, you happened to be in
12 the same area as Edgware Road, where we know there was
13 an incident. So we've got two very large scale
14 unprecedented incidents, an overload on the radio.

15 A. Definitely, yes.

16 Q. That's the effect of it?

17 A. Yes.

18 Q. As has emerged from the questions of Mr Coltart, we know
19 that the stop message that had been purportedly sent
20 from 242, which should have been sent from your
21 appliance, A241, was queried by Control, and the driver
22 of A242, Mr Wilson, confirmed to Control that it must be
23 a mistake and that he'd not sent it. We've seen an
24 extract of his witness statement to that effect.
25 We know from the MOBIS report that two appliances as

1 a result of that -- and we know it's as a result of that
2 because we've had a statement from Mr Paynton, who deals
3 with the issue of mobilisation, and it does appear from
4 the MOBIS report that two appliances were then
5 redirected to King's Cross at about 09.33, if we just
6 have [LFB11-3] back on the screen. That's the one
7 09.33.45, and if you go slightly down the page -- or is
8 it over the page? I'm sorry, yes, it's over the page [LFB11-4]:
9 "To A421. Proceed to King's Cross station."
10 Then the same message to 431:
11 "Proceed to King's Cross station."
12 So those are the two additional appliances that had
13 been requested by Mr Roche, initially were mobilised to
14 Euston Square, but then, as a result of a conversation
15 with Mr Wilson over the code 4 stop message, the
16 supervisor, according to Mr Paynton, realises that they
17 are requested at King's Cross. So they're redirected.
18 Again, Mr Wilson has said that he spoke directly
19 with your driver, I think that was Firefighter Cook.
20 A. He was one of the firefighters on the rear of the
21 appliance.
22 Q. That's at about 9.30, he says. So do you have the
23 conversation directly with A242 prior to the make
24 pumps 8, or after?
25 A. The timescale I'm not -- I couldn't be 100 per cent

1 sure, but I know I did speak to Firefighter Wilson.

2 Q. So you make your way directly, you're in that area, in
3 your appliance, and you make your way directly to
4 King's Cross?

5 A. Yes, we were heading -- from our alarm in Euston Road,
6 we headed back towards King's Cross just as a -- just as
7 a gut instinct that we may be requested, because the
8 amount of appliances already being relocated to other
9 incidences, we were probably one of the few in the area
10 that were available to go on to this call.

11 Q. Right. You've described in your statement how the
12 traffic was very heavy, as indeed it had been for
13 Mr Roche. So you walk or run and allow your driver to
14 take the appliance further to the station?

15 A. That's correct, yes.

16 Q. We know that he booked status at 09.42. Mr Jackson and
17 Mr Wilson estimated your arrival at about 09.35. Are
18 you able to help us with that?

19 A. I'm afraid --

20 Q. So in other words, a few minutes before your appliance
21 booked status?

22 A. We would have got there a few minutes before the
23 appliance, yes.

24 Q. Having spoken to Mr Roche, can you help us, did you then
25 send him and Mr Jackson and Wilson down to the train

1 very shortly after your arrival?

2 A. Once the extra -- well, the information that I'd been
3 given from the British Transport Police, yes.

4 Q. In your statement, I think you refer to instructing your
5 crew to take cutting equipment and go down to the
6 platform, and then you meet the BTP officer.

7 Now, we know that, if that is Mr Mingay, then that
8 would be at about 09.45 because he's logged his times.

9 From the sequence of events you describe in your
10 statement, it would seem that you'd sent Mr Roche down
11 to the platform and then you met Mr Mingay at 09.45. Is
12 that right?

13 A. I suppose, if that's what my statement says, maybe I'm
14 just a little confused with the actual procedures.

15 Q. Because you then go on to say that you then liaised with
16 ADO Munns and he then says you should go down to oversee
17 matters down on the train and the platform, and you then
18 go down?

19 A. That's correct, yes.

20 Q. So that sequence of events would seem to be right?

21 A. Yes.

22 Q. It's obvious from your evidence that you weren't alone
23 on the bombed carriage. We're only hearing from three
24 firefighters, but I think, in total, there will be
25 seven?

1 A. Yes, there were seven of us.

2 Q. Leading Firefighter Roche left to relay information,
3 went up to the concourse and --

4 A. That's correct, yes.

5 Q. -- in fact, was delegated other tasks, so didn't come
6 back down?

7 A. Yes.

8 Q. There were obviously police officers. Did you notice
9 how many police officers?

10 A. I couldn't estimate. I believed that in the carriage it
11 was mainly the firefighters and some other people.
12 Probably behind me in the other carriages there was
13 probably more.

14 Q. Yes. Would there have been room in the bombed carriage
15 for more firefighters to assist or were the conditions
16 such that, actually, there was only room for the number
17 that you had there?

18 A. I think any more probably would have been unnecessary
19 due to the confined space and the amount of work that
20 was having to be done.

21 Q. Were you aware, once casualties had been stabilised and
22 moved out on stretchers, into the carriage behind you,
23 of any holdups there, or did you understand that things
24 were running smoothly and stretchers were being
25 evacuated as soon as they were ready to be?

1 A. I'll be totally honest, I think because of what I or we
2 were dealing with, that was just taking up everything
3 that we was thinking, was just concentrating on that one
4 carriage and it was just to release the people we could,
5 and get them to, hopefully, behind us, where people were
6 then dealing with what they had to deal with. Our job
7 was just to get them to the triage or to, like, the
8 first aiders.

9 Q. We do know that certainly by 10.00 the appliances or
10 most of the appliances that had been sent to
11 Euston Square had been redirected, and so, by that
12 stage, it would seem that there would have been plenty
13 of resources outside of the bombed carriage on the
14 platform and on the station.

15 A. I wasn't aware of any more firefighting personnel.

16 Q. Do you consider that on the bombed train you worked well
17 with the other agencies? Was there a lot of cooperation
18 between you and the police and the London Ambulance?

19 A. Yes.

20 Q. You were able to, between you, prioritise casualties and
21 get them evacuated?

22 A. On the instructions of the doctor that turned up, yes.

23 MS BOYD: Yes, thank you very much.

24 LADY JUSTICE HALLETT: Any other questions for

25 Mr Colebrook-Taylor?

1 Ms Boyd, rather than have to go back and try to
2 interrogate his emails from five years ago, I'm
3 wondering whether, could I ask you and your instructing
4 solicitor to see if you can track down essentially the
5 information that Mr Coltart is seeking, because it may
6 be we don't need to trouble Mr Colebrook-Taylor if there
7 is some other kind of record of his request for a formal
8 debriefing?

9 MS BOYD: My Lady, yes, we can certainly make those
10 enquiries. In other words, as to whether there were any
11 emails received the other end. As I think everyone
12 knows, we have been making strenuous efforts to track
13 down documents, but it has not been easy.

14 LADY JUSTICE HALLETT: It may be easier, I don't know, to
15 ask Mr Colebrook-Taylor to do it himself, I'll leave it
16 to you to work out what is the most straightforward way
17 to do it.

18 Thank you very much, Mr Colebrook-Taylor, those are
19 all the questions we have for you. It's important, in
20 my view, to note, because the appalling situation in
21 which you and your crews found yourself, and the vital
22 role that you performed in treating the dead with
23 dignity and rescuing the survivors, only those of us who
24 have read the witness statements know just how horrific
25 a job you and your crews had and I'm sure we're all

1 extremely grateful to you. Thank you.

2 MR KEITH: Thank you.

3 LADY JUSTICE HALLETT: Mr Keith, I'm afraid, because I have
4 to adjourn promptly at 1.00 -- have we called a witness
5 here from this afternoon early?

6 MR KEITH: I'm afraid I've called for two witnesses from
7 this afternoon early and there is still one left over
8 from this morning, but I don't think there is anything
9 to be gained by starting any of the witnesses now.

10 LADY JUSTICE HALLETT: I can only give my apologies, if
11 we've rushed them here and then we haven't reached them,
12 but obviously there have been important matters we
13 needed to resolve this morning. If we could start again
14 at 2.00.

15 MR KEITH: Thank you, my Lady.

16 (12.55 pm)

17 (The short adjournment)

18