

**IN THE SURREY CORONER'S COURT
BEFORE HM SENIOR CORONER FOR SURREY, MR RICHARD TRAVERS
IN THE MATTER OF THE GUILDFORD PUB BOMBINGS 1974
AND IN THE MATTER OF THE INQUESTS TOUCHING AND CONCERNING
THE DEATHS OF:**

- (1) MR PAUL CRAIG (DECEASED)**
- (2) GUARDSMAN WILLIAM FORSYTH (DECEASED)**
- (3) PRIVATE ANN HAMILTON (DECEASED)**
- (4) GUARDSMAN JOHN HUNTER (DECEASED)**
- (5) PRIVATE CAROLINE SLATER (DECEASED)**

**WRITTEN SUBMISSIONS ON BEHALF OF
COUNSEL TO THE INQUESTS**

For Hearing at Pre-Inquest Review: 29th March 2021 at 10am

1. Abbreviations

H Current Situation Report from Surrey Police;
Counsel to the Inquests;
the Guildford Pub Bombings 1974;
the Horse & Groom Public House;
HM Coroner for Surrey, Mr Richard Travers;
Interested Person;
Ministry of Defence;
Metropolitan Police Service;
Pre-Inquest Review;
Royal Armament Research & Development Establishment;
Royal Surrey County Hospital;

2. Introduction

- 2.1. These submissions provide an update on completed and upcoming work on preparations for the final evidential hearings provisionally listed for Spring 2022.
- 2.2. Insofar as these submissions contain information and proposals in relation to next steps, it should be borne in mind that HMC may take a different view and that any IP may submit questions, challenges or alternative proposals.
- 2.3. It is important to state at the outset that the progress made to date has depended upon, and would not have been possible without, the invaluable assistance and contribution of the SP GPB team, Operation IGIL.
- 2.4. Before proceeding, we also think it appropriate to flag that parts 8-9 below contain outline facts about the deaths of the Deceased which members of their families, in particular, may not have heard before and may find distressing.

3. Searches for potentially relevant materials – the general approach

- 3.1. In the Ruling on Resumption of 31st January 2019, HMC gave the following indication as to the proper scope of these inquests:

[Redacted text]

“how” question must be taken to mean “by what means did each deceased

3.2. Disclosure searches have been guided by the above.

4. Searches for potentially relevant materials – Interested Persons and other entities

4.1. The collation of pre-existing documentary evidence is at an advanced stage, with only a few outstanding lines of enquiry being pursued.

4.2. Surrey Police:

4.2.1. Op IGIL was established approximately two years ago and charged with the collation and review of GPB materials held by SP in order to (1) assist and support the inquests and (2) facilitate the assessment of whether there are any available lines of enquiry open to criminal investigation. Op IGIL has prioritised the processing of material which appears to fall within the scope of these inquests and has provided three tranches of disclosure, with a fourth due within the next month or so.

4.3. The Metropolitan Police Service:

4.3.1. MPS has conducted searches of general, intelligence, forensic files, bomb and counter-terrorism files and databases and files at the National Archives and has liaised closely with SP to avoid the duplication of material. The results of the MPS searches have either been reconciled

4.4. The Ministry of Defence:

- 4.4.1. MOD has conducted searches of material held at: the National Archives; ; the Defence, Science and Technology Laboratory (successor to RARDE); Archive System; the 29 Explosive Ordnance Disposal and Search Group, 38 Brigade; the Scots Guards Regimental HQ; the Royal Military Police; and the Army Training Centre at Pirbright. It has also provided personnel files for WILLIAM FORYTH and JOHN HUNTER and confirmed that the personnel files for ANN HAMILTON and CAROLINE SLATER have not been retained. The MOD has liaised with SP, and Op IGIL has reviewed a large quantity of the results of the above searches, again to avoid duplication, and it is considered that its searches for GPB material are also complete.

4.5. South East Coast Ambulance NHS Foundation Trust:

- 4.5.1. SECAmb is not an IP and it has not been able to locate any potentially relevant materials, but it has made contact with one former ambulance officer who recalls the GPB and a subsequent staff debrief at Banstead HQ. This individual has referred to an ambulance service (each call received by the Service following the explosions) would have been attached. SECAmb has not retained a copy of this and CTI are making enquiries with the National Archives to see if a copy has been retained. Those enquiries have been delayed due COVID-19 staffing restrictions at the National Archives.

5. Tranches of materials provided by

6. First batch of disclosure to IPs of materials identified as potentially relevant

6.1. Pursuant to the above review and discussions with HMC, it is proposed that the first batch of disclosure to the IPs comprise the witness statements and exhibits (from tranches 1-2) and certain core documents (including from tranche 2) as set out below.

6.2. Witness statements:

6.2.1. From the 719 statements by 484 individuals within tranches 1 and 2 reviewed in full by CTI, we have identified the following as disclosable:

(a) From tranche 1: 250 statements by 140 individuals; and

(b) From tranche 2: 65 statements by 53 individuals.

6.2.2. Pursuant to discussions with HMC, the above comprise statements from each witness who gave a statement meeting at least one of the following criteria:

(a) Witnesses present in HGPH at the time of the blast.

Rationale: Naturally, those who were present in HGPH at the time of the explosion give an account of the blast itself, and are also able to speak to the events immediately preceding it, thus giving an account of the circumstances in which the Deceased died (or suffered fatal injuries). The amount of detail given by witnesses as to the blast itself varies in detail and quality - some witnesses give only an extremely sparse account and it should be borne in mind that many of them were relatively young and had been drinking. However, given that the

explosion was the most significant mechanism which directly caused the death of the Deceased, it is considered important to disclose the evidence of those who experienced it first-hand. This goes to matters such as the location of the blast, its force, and its appearance to those who saw it. Some witnesses also mention a hissing sound immediately preceding the explosion.

- (b) Witnesses who saw one or more of the Deceased on the evening of 5th October 1974.

Rationale: In order to fulfil the purpose of these inquests, the chronology of what each Deceased did on the evening of 5th October 1974 is considered to be ~~it~~ relevant. Although the evidence of the witnesses who saw them covers various periods (ranging from their going to Guildford shortly before the GPB to travelling around the town much earlier in the day), it is considered that the ~~it~~ chronology from opening time at the HGPH at about 17:30 hrs is a suitable starting point for disclosure purposes.

- (c) Witnesses who were present in the aftermath of the explosion at HGPH ~~it~~ provided substantive evidence of seeing bodies and/or mentioned helping with bodies or the seriously injured.

Rationale: A number of witnesses give striking evidence of their unsuccessful attempts to assist persons who died in the blast, whilst others give a bare mention of seeing bodies under blankets. The latter kind of evidence is unlikely to be useful, and has not been identified as disclosable. CTI have also excluded persons who give a bare ~~it~~ where there is no suggestion of any involvement with the Deceased specifically.

(d) Witnesses who provide relevant

- (a) Unmarked floorplans (i.e. the documents that were used by witnesses to mark their position/movements);
- (b) Photographs of HGPH;
- (c) Maps of Guildford town centre;
- (d) Contemporaneous reports (re: BT/TT1 12 TfL2u4 (GPH))

7. Sensitive information and personal data

- 7.1. Op IGIL has reviewed the witness statements in the proposed first batch of disclosure materials and confirmed that SP does not wish to make any public interest immunity claims in relation to their contents. (One police statement by DS Donaldson goes on to deal with possible suspects in passages which fall outside the scope of the inquest and will be redacted accordingly.) Op IGIL will also review the other documents scheduled for inclusion in the first batch of disclosure and, where necessary, the Government Legal Department, as representative of the MOD and Home Office, is also being consulted.

- 7.2. In addition, we have considered whether any further redactions might be needed for privacy or data protection reasons and do not think this is necessary.

8.2. The Horse and Groom Public House:

- 8.2.1. HGPH was situated towards the easterly end of North Street in Guildford town centre. It was a short walk from SSPH, which was situated to the southwest on Swan Lane (a passage off North Street). The pubs in this area were frequented by military personnel. On Saturday 5th October 1974, many members of the armed forces came into Guildford from training centres and barracks at Pirbright, Aldershot, Southton and Elizabeth Park in Guildford itself. A small number came from London.
- 8.2.2. HGPH was popular with military personnel at the time, particularly young women from the WRAC. Its sole entrance was on the northern side of North Street. On entering the bar, facing north, there was an amusement machine and room divider immediately to the right, behind which was a seating area and access to the gents toilets and cellar. The bar was positioned straight ahead of the entrance, perpendicular to the front wall and slightly to the right. There was a kitchen behind the bar, at the north-eastern corner of the building. Facing the bar, on the left hand / western side of the pub, there were two alcoves separated by a partition, each with tables and chairs, and bench seats around the outside. The second, northern-most alcove contained a fireplace and a jukebox against a wall and the ladies toilets were located behind this wall. The bomb exploded in the second alcove.
- 8.2.3. The damage to the pub was significant. Shortly after the blast, a hole opened up in the floor to the

8.3. The witness evidence:

8.3.1. It is clear that as part of their investigation after the bombing SP attempted to identify and take statements from, amongst others, everyone who attended HGPH from its evening opening time at 17:30 hrs. The statements taken vary in their level of detail and are not all consistent, but it is clear that the blast emanated from the second alcove adjacent to the fireplace. More precise evidence as to the location and nature of the explosive device can be found in the statement of

9. Key witness groupings

9.1. From the witness evidence provided by Op IGIL and reviewed by CTI thus far, work is ongoing to identify those witnesses who are most likely to be able to provide the most significant evidence for these inquests.

9.2. The witness evidence reviewed thus far has been divided into three broad groupings referred to below and to divide them into three broad groupings:

was the following day, 6th October (it was to be something of a joint celebration). CAROL BURNS and her friend SHEILA PARROTTE travelled with them by car to HGPH, arrived at around 19:00 hrs and the party

9.4. Group 2: FORSYTH & HUNTER:

- 9.4.1. WILLIAM FORSYTH and JOHN HUNTER formed part of a larger group of young Scots Guards from the Barracks at Pirbright, who went into Guildford to enjoy their Saturday evening. The individuals in this group were as follows:

JAMES COOPER
STEHEN COOPER
ALEXANDER FINDLAY
WILLIAM FORSYTH
JOHN HUNTER
ROBERT NODDLE
BARRY RUSHTON
BRIAN SCANLAN

- 9.4.2. The group first went to SSPH at around 19:15 hrs. WILLIAM FORSYTH and JOHN HUNTER then left that pub at around 19:30 hrs, and went to HGPH instead, arriving at around 19:45 hrs. Once there, the movement of the Deceased and their friends was more fluid, as the young men enjoyed socialising and drinking. However, it is clear that FORSYTH and HUNTER were also based in the second alcove

JAMES ADAMS

Ambulance

9.6.2. The explosion seriously damaged the floor of the pub. Two individuals who had been situated in the second alcove (JANET OLIVER and CAROL BURNS) were rescued, but the floor then collapsed, causing a number of the Deceased and other individuals (including ROBERT and EILEEN BURNS and STEPHEN COOPER) to fall into the cellar below.

9.6.3. In terms of the order in which the Deceased w072 Tc 516maw072 792 re-6 (d (De)-3 (c

10.3. Professor Thomas Hennessey, Professor of Modern British and Irish History at Canterbury Christ Church University gave expert evidence at the Birmingham Pub Bombing Inquests on the historical context of the Northern Ireland Troubles and the Provisional IRA bombing campaign on mainland Britain in 1973-1974. HMC has obtained and r instructions and report (kindly provided by HM Senior Coroner for Birmingham) and is of the view, with which we agree, that similar evidence would assist in these inquests. therefore contacted Professor Hennessy IPs will be updated on his response. Subject to this, the IPs will be given an opportunity to comment on the appointment of any such expert and, if so, their instructions.

10.4. Finally, we think it important to warn the families of the Deceased that the first batch of the disclosure contains some potentially distressing evidence including:

10.4.1. Photographs of HGPH following the blast (n images of the Deceased or any injured persons/unidentified bodies, but photographs of this kind do exist and consultation about their disclosure and use will take place in due course); and

10.4.2. Witness statements which provide (sometimes vivid) descriptions of the immediate aftermath of the explosion and rescue attempts.

11. Conclusion and next steps

11.1. A significant amount of progress has now been made in collating, processing and reviewing material for the substantive inquest hearings. The majority of material which is relevant to the scope of the inquests (as ne(ti)-3 (ng)-9 (,)TJETQ

11.2. With that in mind, HMC has provisionally listed this matter for a final hearing