

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 a Pre-Inquest Review: 25th March 2022 at 10:00am

1. Abbreviations

“CJA 2009”	Coroners and Justice Act 2009;
“CSR”	Current Situation Report from Surrey Police;
“CTI”	Counsel to the Inquests;
“ECHR”	European Convention on Human Rights
“GPB”	the Guildford Pub Bombings 1974;
“HGPH”	the Horse & Groom Public House;
“HMC”	HM Senior Coroner for Surrey, Mr Richard Travers;
“IP”	Interested Person;
“MOD”	Ministry of Defence;
“MPS”	Metropolitan Police Service;
“PIR”	Pre-Inquest Review;

“PIRA”	the Provisional IRA;
“RARDE”	Royal Armament Research & Development Establishment;
“RSCH”	Royal Surrey County Hospital;
“SECAmb”	South East Coast Ambulance Service;
“SP”	Surrey Police;
“SSPH”	the Seven Stars Public House.

2. Introduction

2.1 Further to written submissions from CTI dated 23rd December 2021 for the previous PIR on 14th January 2022, these submissions provide another update on completed and upcoming work on preparations for the final evidential hearings for these inquests

- 3.1.2 Batch 2: 44 witness statements; 45 floorplans; 127 other documents.¹
- 3.1.3 Batch 3: 20 witness statements; 2 floorplans; 83 other documents.
- 3.2 An updated CTI Evidence Overview note has been circulated to IPs reflecting the further disclosure.
- 3.3 As any further relevant documents are obtained, they will be also be disclosed on Caselines. For ease of navigation by IPs, they will be uploaded to Caselines in a section entitled Batch 4, but it is intended to upload these further documents as and when they are ready, rather than wait and release them together.
- 3.4 It is anticipated that these further documents will include, by way of example:
 - 3.4.1 The report/statement of Ms Lorna Hills.
 - 3.4.2 The report of Professor Thomas Hennessey.
 - 3.4.3 Further witness statements that are submitted by witnesses who are attending the inquest hearings.²

Further evidence

- 3.4 Junior CTI are continuing to liaise with family representatives who are able and willing to assist with “Pen Portraits” for each of the Deceased. Significant progress has been made, and they will be disclosed to IPs as they are finalised.

3.5 On 21st March 2022, the MOD provided to CTI the report of Ms Lorna Hills addressing contemporaneous documents relating to the nature of the explosive device used in the HGPH (see §3.18.9 of the Junior Counsel Note of the PIR of 14th January 2022³). This was circulated to IPs on 24th March 2022. Ms Hills is currently proposed to be called to give oral evidence. The views of IPs are sought as to whether, in addition to hearing from Ms Hills, HMC should read the statements and reports on which her report is based.

3.6 The MOD has also confirmed to CTI that:

3.6.1 Enquiries are ongoing in respect of security advice and the threat level system in place around the time of the GPB (see §§3.11 – 3.12 of the Junior Counsel Note for the previous PIR). CTI understand that further meetings are planned in the week commencing 21st March 2022, and anticipate that MOD will provide a further update at the PIR hearing.

3.6.2 In that regard, the BBC also published an article on 8th February 2022, which referred to certain military security-related materials from 1974 that it had viewed at the National Archive. Copies of this material will also be requested from the BBC. CTI also brought the article to the attention of the MOD in case it assisted their enquiries.

3.7 The report of Professor Thomas Hennessey is not yet completed. However, his instructions have been confirmed, he has accessed the documents included with his instructions on Caselines, and work is actively ongoing. CTI are maintaining contact with him in an effort to ensure his report is provided, and thereafter made available to IPs, as soon as possible.

³ See: https://www.surreycc.gov.uk/data/assets/pdf_file/0009/285741/14-Jan-2022-PIR-Junior-Counsel-Note-final-for-HMC.pdf

3.8 At the previous PIR Ms Emma Galland (solicitor for Royal Surrey NHS Foundation Trust) informed HMC that she had made contact with a Ms Charlotte Freeman, who is currently involved in Emergency Response planning at the Trust, and who (it was thought) might be in a position to speak to the 1974 report from South West Surrey Heath District that had been obtained from the London Metropolitan Archives (see §§3.23-3.24 of the Junior Counsel Note for the previous PIR). On 22nd March 2022 Ms Galland updated CTI that, on further discussion with Ms Freeman, she did not feel able to assist the court in that regard, although would be willing to assist should any Regulation 28 issues arise in the course of the inquest.

4. Witness update

4.1 Significant work is ongoing in terms of tracing and contacting witnesses, with a view to formulating a final witness list and schedule for the final inquest hearings. The updated Evidence Overview reflects the current position as to which witnesses are confirmed as alive, and their position in relation to contact and attendance at the inquest hearings.

4.2 CTI have been working on establishing contact with 55 witnesses (not including family representatives, Ms Hills and Professor Hennessey). These include 52 from the CTI Evidence Overview circulated for the last PIR, and 3 other possible witnesses whose names emerged in the course of speaking to individuals who were being contacted, or through enquiries undertaken by other IPs. In order to provide HMC with the broadest range of options possible when finalising the witness list, this includes both witnesses who CTI have proposed calling, and witnesses whose evidence is proposed to be read. Of that group of witnesses⁴:

⁴ As of 23rd March 2022.

- 4.2.1 28 (including 18 call witnesses, 4 call-read witnesses, 1 read-call witness, and 5 read witnesses) have responded and confirmed they are willing and able to attend to give evidence if called, although some have limited availability and a small number have indicated they would be unable to give evidence in person e.g. due to being abroad.
- 4.2.2 2 have been confirmed as deceased.
- 4.2.3 1 has been confirmed as lacking capacity and thus unable to assist further.
- 4.2.4 5 have responded but sought to be excused from attending (4 of these on medical grounds).
- 4.2.5 8 (3 call witnesses, 1 call-read witnesses, 1 read-call witness, 2 read witnesses, and 1 previously unassigned person) have not yet responded or provided availability. CTI are in the processing of chasing these witnesses for a response where appropriate.
- 4.2.6 10 (3 call witnesses, 2 call-read witnesses, 1 read-call witness, 3 read witnesses, and 1 previously unassigned person) have not yet been contacted, as CTI have not been able to obtain contact details for them. Efforts are continuing in that regard, although almost all avenues have now been exhausted

4.3

prepared by Friday 15th April 2022, so that the witnesses can be warned of their required dates of attendance.

5. Other issues

capacity) but made available on request if appropriate.⁶ CTI will also be mindful of the desirability of making certain core materials used in the final hearings available to media organisations without requiring a specific request.

Need for a further PIR

5.4 CTI consider that, whilst the court remains on track to commence hearings by 6th June 2022, there are a number of outstanding items (particularly in relation to expert evidence and the finalisation of a witness schedule) which would benefit from one further short PIR, to take place shortly before the final hearings. CTI propose that, if the court diary permits, a PIR is listed for mid-May.

OLIVER SANDERS QC

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24th March 2022

⁶ The media contact person remains the HMC's lead officer for these inquests, Ms Heather Nin.