

**INQUESTS ARISING FROM THE DEATHS IN THE WESTMINSTER TERROR
ATTACK OF 22 MARCH 2017**

**SUBMISSIONS ON BEHALF OF THE LONDON FIRE & EMERGENCY
PLANNING AUTHORITY FOR THE PRE-INQUEST HEARING**

ON 15 JANUARY 2018

Introduction

1. These submissions are provided by the London Fire & Emergency Planning Authority (“LFEPA”), the statutory body which operates the London Fire Brigade, and which was one of the emergency responders on 22 March 2017.
2. These submissions are provided in order to assist the Chief Coroner at the Pre-Inquest Review on 15 January 2018 in so far as the LFEPA is able to do so at this stage of the proceedings prior to disclosure. The numbering below follows the Agenda provided by CTI.

(1) Interested Persons

3. As indicated at the Pre-Inquest Review on 19 May 2017, the LFEPA wrote to HM Senior Coroner Dr Fiona Wilcox by letter dated 2 June 2017 applying for Interested Person status in relation to all six inquests (but see paragraph 5 below). That application has been provided to the Chief Coroner and a decision is awaited. It is noted that CTI submit: *“Given that the inquests are likely to consider the actions of first responders, including fire service officers, it is submitted that the LFEPA has a good case for designation as an IP pursuant to section 47(2)(m)”* (paragraph 7, CTI submissions, 4 January 2018). Without pre-supposing the Chief Coroner’s decision, the submissions below are made on the premise that Interested Person status is granted.

(2) Update on Investigations

4. Paragraphs 8 to 12 of CTIs submissions dated 4 January 2018 are noted.

(3) Organisation of the Inquests

5. The LFEPA agrees with CTI in that the preferable course is for the Court to hear the inquests into the deaths of the victims (including PC Palmer) in one hearing and then immediately thereafter to hear the inquest into the death of Khalid Masood in a separate hearing. If so, LFEPA does not seek IP status in respect of the inquest of Khalid Masood.

(4) Scope of the Inquests

6. Subject to disclosure, the LFEPA agrees with the issues set out by CTI at paragraph 16 of CTI submissions of 4 January 2018.

(5) Summoning of Jury/Juries

7. The LFEPA agrees with the submissions set out by CTI at paragraph 17 to 19 of CTI submissions of 4 January 2018.

(6) Article 2

8. The LFEPA has no submissions to make at this stage prior to disclosure.

(7) Arrangements for Disclosure to Interested Persons

9. Paragraphs 24 to 27 of CTIs submissions of 4 January 2018 are noted.

(8) Witnesses for the Inquests

10. The LFEPA may make representations as to the witness list once received.

(9) Video evidence/visual aids

11. Paragraphs 30 to 33 of CTIs submissions of 4 January 2018 are noted.

(10) Expert evidence

12. Paragraphs 34 to 35 of CTIs submissions of 4 January 2018 are noted.

(11) Anonymity/special measures

13. No applications are sought by the LFEPA.

(12) PII

14. No applications are sought by the LFEPA.

(13) Venue and Timing of Inquests/Future Case Management

15. Paragraphs 46 to 47 of CTIs submissions of 4 January 2018 are noted.

(14) Logistical Arrangements for the Inquests

16. The LFEPA has no submissions to make at this stage of the proceedings.

Saba Naqshbandi

9 January 2018

Three Raymond Buildings

Gray's Inn

London