

THE CHIEF CORONER  
HHJ LUCRAFT QC

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

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**SUBMISSIONS ON BEHALF OF THE MPS IN RELATION TO THE REQUEST TO HAVE PCs  
MARSH AND CARLISLE CALLED AS WITNESSES**

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1. The MPS has had sight of a request from the lawyers for the family of PC Palmer (but not, perhaps, his widow) for PCs Marsh and Carlisle to be called as witnesses in the inquest into the death of PC Palmer. PC Carlisle is currently a witness only in the inquest into the death of Khalid Masood, and PC Marsh is currently not a witness at all.
2. The reason for this is said to be that  
  
*these two officers can give evidence as to the period between the sound of the collision and the people running past Carriage Gates, which they regard as significant in light of the questioning of PC Sanders.*
3. The application is opposed for the following reasons.
4. **First**, this request is advanced in apparent support of the likely further rehearsal of the hypothetical forensic point (which Ms Stevens repeatedly put to PC Sanders, until the Chief Coroner invited her to desist) to the effect the elapse of time from the vehicle impact to the crowd running past Carriage Gates was such that, *had* the AFOs been at Carriage Gates, they *might* have remained there. This has been exhaustively explored with both AFOs. They made clear that, whatever the circumstances at the gate, they would have gone to investigate the noise and would therefore not have been at the entrance of Carriage Gates. Further evidence from unarmed officers is not likely to assist the Chief Coroner.
5. **Second**, to the extent that it is erroneously believed that further evidence is required on this issue, it is notable that questions concerning the elapse of time between the explosive noise and Masood running through Carriage Gates were not put by counsel for PC Palmer's family to PCs Ross and Glaze. Ms Stevens is not entitled to have other unarmed officers called to remedy any omission.

6. **Third**, the unarmed officers are highly unlikely to be able to assist with either their perception of the elapse of time, or with what other witnesses might have done. Putting it in other words, there is little purpose to be gained in asking PCs Marsh and Carlisle questions, 18 months later, about how many seconds elapsed, and about how far towards Bridge St PCs Ashby and Sanders *might* have gone even *had* they been at Carriage Gates. Providing timings to within a few seconds is notoriously difficult. Unless the answers accord with the objective evidence, their evidence would likely be disregarded in any event.
7. **Fourth**, the best evidence comes in any event from the CCTV which can identify with accuracy the time of the Hyundai impacting on Bridge Street and when the crowd runs past Carriage Gates. The main video compilation shows the impact of the car at 14:40:38. Masood gets out of the car at 14:40:50 and moves towards Parliament Square: 14:40:53 and, so, takes 15 seconds to get to the Square. The footage from Bridge Street does not have a clock on it, but it is clear from the footage that the crowd does not begin to run until Masood has made his way around the corner and, then, it is at least 3 seconds before the first person runs towards CG, with the crowd coming past six seconds later (so, around 24 seconds). The CCTV similarly shows Masood at Carriage gates around 14.41.04 – ie 26 seconds (not 9 or 10 seconds) after the crash. On any view, the crowd therefore does not start running past the gates until at least 20 seconds after the sound of the “explosion”. In that time, either PC Ashby or Sanders would have gone a significant way towards the North side of NPY.
8. **Fifth**, the welfare of the officers is a relevant consideration. All officers who witnessed the events which led to the tragic killing of a colleague have been traumatised. The IT is aware that the impact upon some witnesses has been considerable. Having to give evidence twice will inevitably cause further distress to PC Carlisle. It was never proposed that PC Marsh would give evidence in any of these inquests. He has since retired from the MPS. He has not been seen by the MPS inquest team or been given any legal or welfare support in advance of giving evidence. The MPS is highly resistant to subjecting these individuals to considerable anxiety given that there is no forensic value in the evidence the family wish to adduce.
9. **Last**, a secondary consideration is the inconvenience that the scheduling two new witnesses at short notice would cause. The inquest is already overrunning, and adding further witnesses in the circumstances should only be considered where they have relevant evidence to give which cannot be obtained from other sources. This is manifestly not the case in relation to PCs Marsh and Carlisle.

Hugo Keith QC  
Matthew Butt

20 September 2018

Three Raymond Buildings