

IN THE SHEFFIELD CROWN COURT

The Crown Court,
Castle Street,
Sheffield

10th May, 1985.

Before

HIS HONOUR JUDGE GERALD COLES, Q.C.

REGINA

-v-

WILLIAM ALBERT GREENAWAY

and Others

APPEARANCES:

For the Prosecution: MR. B. WALSH, Q.C. and
MR. K.R. KEEN

For the Defence: See Attached Sheet

From the Shorthand Notes of J.L. Harpham Ltd.,
Official Shorthand Writers, 55 Queen St.,
Sheffield S1 2DX

Defendants and Representation:

DEFENDANT

WILLIAM ALBERT GREENAWAY
DAVID MOORE
BERNARD JACKSON
GEORGE KERR McLELLAND FOULDS
BRIAN IRVINE MORELAND
ERNEST BARBER
DAVID RONALD COSTON
KEVIN MARSHALL
ARTHUR HOWARD CRICHLOW
GEORGE WARWICK FORSTER
JAMES O'BRIEN
CRAIG WADDINGTON
ERIC SCOTT NEWBIGGING
STEFAN WYSOCKI
DAVID BELL

REPRESENTED BY:

MR. G. TAYLOR
MR. M. MANSFIELD
MR. M. MANSFIELD
MR. P. O'CONNOR
MRS. V. BAIRD
MISS M. RUSSELL
MRS. V. BAIRD
MR. E.P. REES
MR. P. O'CONNOR
MRS. V. BAIRD
MR. P. GRIFFITHS
MR. M. MANSFIELD
MR. E.P. REES
MISS M. RUSSELL
MISS M. RUSSELL

INDEX TO TRANSCRIPT

Friday, 10th May, 1985.

	<u>Page</u>
A.M. Visit to Orgreave Site by the Court	1.

2 p.m.

Witnesses for the Prosecution

<u>ASST CHIEF CST ANTHONY RAYMOND CLEMENT</u> Sworn	
Examined by MR. WALSH	4.

INDEX TO TRANSCRIPT

Friday, 10th May, 1985.

	<u>Page</u>
A.M. Visit to Orgreave Site by the Court	1.

2 p.m.

Witnesses for the Prosecution

ASST CHIEF CST ANTHONY RAYMOND CLEMENT Sworn

Examined by MR. WALSH 4.

Friday, 10th May, 1985.

MR. WALSH: Your Honour, we have had certain discussions about where we might go and what might happen. I gather it is the consensus view of my learned friends on behalf of their clients that they would like the Jury to start at the junction with Poplar Way. Now, that is not on the detailed map. Your Honour will realise it is on the large Ordnance Survey map. It will mean rather more walking than I suspected. I don't suppose it will do any of us any harm. One of my learned friends says that he would like the Jury - and I will question in a moment how far they go - to walk in both directions, there and back, so might I suggest that if they are going to do that that it would be better to do the uphill journey first and the downhill journey last, so the major exertion is at the beginning when everybody is fresh? So, I think the plan is to begin at the junction with Highfield Lane and Poplar Way, then, weather permitting, to walk up the hill, past the entrance to the works and over the railway bridge and, I understand from my learned friend Mr. Griffiths, up to the junction with Orgreave Lane and as far as, at any rate, sighting distance of the Asda Supermarket, which may figure at some point in the evidence. That is not exactly a short distance

JUDGE COLES: I take it you are all fit, members of the Jury? We shall require medical service, you realise? We will just have to take it gently and see how we get on.

MR. WALSH: What it is envisaged I will do is as we reach or pass any particular place that I have referred to in the opening, or that my learned friends have mentioned to me as perhaps being a material place, we will stop and I will merely say, "This is such and such, or that is such and such", and if it be necessary to mention the name of a person who occupies it because I mentioned that person in my opening, then I will do so. I don't envisage, unless anybody specifically thinks I should, repeating again what I said in my opening as to what the Crown allege happened at that particular site, because I would, in my view, be giving evidence rather than just pointing out where things were, but if anybody wishes me to do so, I will. It is thought helpful that the Jury might like to take along the local plan with them. That is the extra one that I put in yesterday.

JUDGE COLES: Yes. Take care it is not the coloured one, members of the Jury.

MR. WALSH: So if they wish, while looking at a particular premises, to note on this particular plan which house is which insofar as it helps them, then at least they can do so.

JUDGE COLES: Yes.

MR. WALSH: I don't know whether it will assist them to take anything else. I myself, really because I got into it that way, found the aerial photograph more helpful, but obviously I wouldn't discourage anybody from taking it if it helps, but I would have thought the only two documents the Jury need to take are the local plan and, if they wish, the aerial photograph.

JUDGE COLES: Yes, very well. I think I shall probably confine myself to this.

Now, members of the Jury, may I give you a word of caution before I say anything else - I am sorry, are you finished, Mr. Walsh?

MR. WALSH: No. May I say one other thing?

JUDGE COLES: Yes, of course.

MR. WALSH: Anticipating how long this will take is difficult, particularly as it will be a lengthy walk in both directions. One thing in which we are all agreed is that by the time we get there, do what we have to do and come back it is, we think, unlikely, indeed certain, that the morning will have gone (sic) and there will be no time for evidence to be called this morning, so that the earliest we will be calling evidence would be after the customary mid-day break.

JUDGE COLES: While we are all here and talking, what sort of time is it - I don't know the times of the trains, but I appreciate that it has already been discussed that some of the Defendants may wish to get away.

MR. WALSH: Yes.

JUDGE COLES: Have we any idea of the sort of times that is likely?

MR. O'CONNOR: Yes. I raised this particularly in the case of Mr. Foulds. His train, with many later connections, leaves Sheffield at four o'clock. Of course, as your Honour knows, the station is quite close, so I would probably ask that we rise, therefore, at, say, three-thirty, which would give good time.

JUDGE COLES: Yes. Very well. He is not the only one. I don't wish anyone to misunderstand.

MR. O'CONNOR: No, but three-thirty won't cause great difficulty for some of the other long-distance Defendants.

JUDGE COLES: No. Very well.

Members of the Jury, you will know of the solemnity of this case. It is a serious case and you must all remember that. What we are about to do, although we are going to do it in buses and by walking, is by way of being part of this case. It will not have escaped your attention that every word that is exchanged is recorded by a shorthand writer in case this court or another court needs to learn what went on. It will also not have escaped

your attention that when a specific matter is proposed it has to be discussed by Defending Counsel and Prosecuting Counsel. It is therefore essential that everybody knows everything that goes on and that things are not said and things are not done which are not within the knowledge of the Defence Counsel, for example. So, restrain, please, as much as you can from talking among yourselves at any length about the case. If you have any questions when you get to the site you will notice the shorthand writer will be with us. Please don't ask those questions indiscriminately. The linkman, if I may so describe him, is Mr. Walsh. If you have any questions, write them down and ask them later, if it can be done like that. If it is something which affects the site, would you please indicate you wish to ask a question, refrain, please, from making comments - if you indicate you wish to ask a question, then it can be asked through Mr. Walsh or myself and the shorthand writer can record it, and then everybody involved in the case knows exactly what is being said. Do you understand? Those are the difficulties of going outside the courtroom. so please respect what I have said and I am sure we will get on perfectly well.

MR. GRIFFITHS: May I mention one matter?

JUDGE COLES: Certainly.

MR. GRIFFITHS: It is just the suggestion of walking both ways came basically from me . Now, I was not aware then that another one of my learned friends - I think, Mr. Mansfield - would have comments. Poplar Way is past the coking plant. What I would propose, to cut down some of our walking, would be if we were to start walking in Poplar Way, say the bottom end, and in that way we would then walk past the coking plant and go up to the top. the Asda area, so to speak. I am anxious the Jury walk all together down from Asda to the coking plant.

JUDGE COLES: The Main Gate?

MR. GRIFFITHS: Yes. So, I would be quite happy were the transport, so to speak, to move up to the coking plant so the walk back is shorter than the walk uphill.

JUDGE COLES: That meets with everybody's approval, does it?

MR. GRIFFITHS: Yes, it does.

JUDGE COLES: Very well. I think we have saved ourselves a walk. I think that everything is organised. I saw buses outside.

(The Court adjourned to view the
Orgreave Site)

(No questions were asked)

2 p.m.

ASSISTANT CHIEF CONSTABLE ANTHONY RAYMOND CLEMENT Sworn

Examined by MR. WALSH:

- Q. Mr. Clement are you Anthony Raymond Clement? - A. I am.
- Q. Your address, please? - A. 52, Winfield Court, Worley, Sheffield.
- Q. And I think you are recently retired from the Police Force. Is that right? - A. That is correct, sir.
- Q. And you are now head of security for Rolls Royce? -
A. Chief Security Adviser.
- Q. Were you, until your recent retirement. Assistant Chief Constable, Operations, for the South Yorkshire Police?
- A. I was.
- Q. And up to the date of your retirement had you been in the Police Force for approximately 33 years? - A. Yes, sir.
- Q. And your service has been in this part of the country? -
A. Yes, it has.
- Q. Commencing with Sheffield City. Sheffield and Rotherham and then South Yorkshire, and I think your length of service as Assistant Chief Constable was something like four years? -
A. And a few months.
- Q. In May of last year. on the 22nd, did you become aware that the British Steel Corporation intended to move coke from the Orgreave Coking and Chemical Plant to its furnaces in Scunthorpe by means of road transport? - A. Yes, sir.
- Q. Up to that time had rail freight been used or was it a mixture of both? - A. Not quite up to that time. It had been used previously, but because of certain disputes rail transport was no longer available to move that coke.
- Q. Yes, and from the 22nd May was coke regularly collected from those works every day, Monday to Friday, and twice a day? -
A. That is correct.

MR. MANSFIELD: I wonder if there could be no more leading after this, your Honour?

JUDGE COLES: Yes, very well.

- Q. MR. WALSH: How many convoys of lorries were there?
A. Two.
- Q. And was that every day? - A. Every week day.

- Q. Were the times of the convoys precisely the same each day or did they vary? - A. Not precisely.
- Q. No, but approximately, then, when was the first? - A. About half-past-eight in the morning, something of that sort, perhaps a little earlier.
- Q. Again I don't know whether it was the same on every day, but approximately how many lorries constituted the convoy? - A. They did vary, but generally it was 30 to 35. It did go up to 50 on occasions.
- Q. I don't think I would be accused of leading you if I said there must be lorries arriving empty and departing full? - A. Initially they did, but later on they began to bring coal into the coking plant and take coke out, but initially, certainly, they arrived empty and took out coke.
- Q. I see. When they arrived did they always come from the same direction or did they come from different directions? - A. No, same direction.
- Q. The Court and the Jury are now familiar with the local geography and they know the route in from the motorway and so forth and how the land goes uphill towards the plant. What was the arrival route at the coking works for the lorries when they came? - A. They came off the motorway, down Poplar Way to Highfield Lane and then along Highfield Lane and turned left into the main entrance of the coking works.
- Q. And again, approximately how long did it take for the lorries to load? In other words, between the time of arrival and the time of departure, what sort of period? - A. There was a slight difference as time went on because, as I have said, initially they came empty and the turn-round time was about an hour and ten minutes, something of that sort. Later on there was a little longer time to turn round because they had a load of coal which they dumped and then moved the lorry on to load up with coke, so an hour and twenty minutes, an hour and a half, something like that, and sometimes it varied because of the availability of the loading equipment.
- Q. When you said a few minutes ago that the first run was round-about eight or eight-thirty in the morning, are you talking now of the time of arrival of the lorries or departure of the lorries? - A. I am talking about the time of arrival generally.
- Q. Yes. So, on the basis of the times you have just given us, we are talking about arrival times between eight and eight-thirty and departure times between about nine and nine-thirty, thereabouts? - A. That sort of time, yes.
- Q. And at what time of day, approximately, were the second? - A. About lunchtime, roundabout twelve o'clock, that sort of time.
- Q. Is that arrival or departure? - A. That is arrival.

- Q. And following the commencement of this run of lorries, what began to happen from time to time at Orgreave and the vicinity of the coke works? - A. From time to time a large number of demonstrators began to arrive near to the main entrance and it was quite obvious from what they said and from their actions that they were intent on stopping the movement of coke from Orgreave to Scunthorpe.
- Q. And during the period of time that those demonstrators frequented Orgreave were you, throughout that period, the senior Police Officer in overall charge of Police operations in the vicinity of the plant? - A. I was.
- Q. And what was the purpose of your operations? - A. One purpose only and that was to ensure that people who had a lawful right to work and to go into Orgreave were able to do so without interference from people who were intending to stop them.
- Q. And what about people wanting to go out of Orgreave? - A. The same applied. It was a lawful operation. They had a complete right to do as they were doing and it was my intention to ensure that what they were lawfully entitled to do, they would do.
- Q. Yes. Now, you have told us that the 22nd May was the day when you became aware that deliveries were going to be done by road? - A. Yes.
- Q. Over what period of time - days, weeks or months - are we talking about when the demonstrators were present? - A. Well, from the 22nd onward there was a progressive build up of the number of demonstrators who arrived at Orgreave, but following the 18th
- Q. Of? - A. 18th of June - there were virtually no demonstrators there at all. In fact, on the 19th June there were four demonstrators, but we allowed two in as a picket.
- Q. So, we are talking of a period of about a month? - A. About a month, yes.
- Q. So the Jury can get the picture, were there demonstrators there every single working day or not? - A. Yes, there were some there every working day and, in fact, on two occasions, one a Bank Holiday and one an ordinary Saturday, some turned up although there were no coke runs.
- Q. Yes - A. And they had been told there were no coke runs.
- Q. Yes, I see. You said the numbers varied. Can you give us some guide as to that to help us about numbers from time to time? - A. Yes. It varied very considerably. Initially, starting with the 22nd/23rd May, there may have only been several hundred
- Q. Just a moment. Yes? - A. And then on some particular days, namely 29th May, 30th May and 6th June, there were many thousands.

- Q. I am not going to ask you, I think, much in detail about those days, but if you could give us some indication about numbers - were you, in fact, physically present on those days that you talk about? - A. Yes, I was.
- Q. Perhaps I should ask, were you present every day throughout this period or not? - A. Yes, I was.
- Q. You were? - A. Yes.
- Q. Well now, the dates that you are talking about, the one at the end of May, I forget which day - A. 30th May was a particularly bad day.
- Q. About how many people were there on that occasion? - A. Certainly several thousand. I'm talking about three or four thousand.
- Q. Which was the next day that you were mentioning? - A. 6th June.
- Q. And about how many were there there then? - A. Probably slightly more on that occasion, on the 6th June.
- Q. Yes. I am not asking you yet about the 18th June. Was there any other date that you recall where there were large numbers? - A. There was 29th May, 30th May, certainly, 6th June, certainly, a date other than that, not that I can recall.
- Q. Do you have the records, your notes? - A. I think I have the records of things that happened prior to the 18th, if they would assist.
- Q. JUDGE COLES: When was the record made and what is the nature of the record? - A. The record, your Honour, was made daily. In actual fact it was a diary that was kept under my supervision but not by myself.
- Q. How often did you look at it? - A. Oh, daily.
- Q. So, each day you had an opportunity to look at it? - A. Yes, yes, I did.
- Q. And satisfying yourself that it was accurate? - A. Yes.
- Q. Is there any objection to his referring to this to refresh his memory from that?

MR. MANSFIELD: No, your Honour.

THE WITNESS: I'm not sure I have it with me, but if it would help I will have a look.

JUDGE COLES: I think you will be here all Monday in any event, so if it isn't here today

THE WITNESS: Yes. I hadn't come prepared to talk about days other than the 18th.

MR. WALSH: I appreciate that.

THE WITNESS: If you wish me to have it on Monday, I certainly will.

JUDGE COLES: I understand it will be desirable for us to have a short adjournment, so we will adjourn.

(Short Adjournment)

JUDGE COLES: We can return to that specific matter on the Monday.

MR. WALSH: Yes, your Honour:

- Q. You can, however, help us in general terms, Mr. Clement. What was your policy so far as handling the numbers of demonstrators there on any particular day? Would you perhaps pause every so often so that people can complete their notes? - A. What I decided to do was to allow about six to eight men to form what might loosely be described as an official picket. I'm not sure they can have a picket in those situations where there are people from one organisation attending at the premises of another organisation.
- Q. I don't think we need get involved in the legal complexities of secondary picketing

JUDGE COLES: Yes, let's not.

THE WITNESS: Certainly I decided that it would be best to allow about eight men to stand by the main entrance to the coking works and to hold the remainder away from the main entrance. Now, the reason for that is probably quite obvious because the lorries were coming along Highfield Lane, they were heavy lorries, after the initial period they were heavier laden, going into the works and out of the works, and I simply could not risk having large numbers of people around the entrance where these heavy lorries were coming in.

- Q. MR. WALSH: Just pause there. Now, as you say, it is obvious, but risk of what? - A. Injury to the people gathered around the gate.
- Q. So, you were to allow a picket of, I think you said about eight people, by the gate, and what about the rest of the people who assembled? - A. Yes. My only concern was not, of course, injury to those people who might be gathered around the gate. My other concern was that the lorries should be able to enter and leave without any violence being used towards them, towards the drivers. The remainder of the people, therefore, I decided would be kept well away from the main gate and, in fact, I decided on two locations.

- Q. Pause there. Those two locations were? - A. Well, the first, the main location was towards the Handsworth side of the main entrance, that is, towards the railway bridge.
- Q. Do you have a shorthand name for it? - A. That is "topside".
- Q. You need not describe it any further because we all know where that is. - A. Right.
- Q. And the other location, the bottom side, which was at the junction of Poplar Way and Highfield Lane, I think that is a sports field, we all saw that this morning. - A. Yes, it is. That was the secondary location.
- Q. Going back for a moment to the picket of about eight people, was that established every day? - A. It was.
- Q. And how did you organise that? - A. Well, they really organised themselves. About eight people would appear and describe themselves as an official picket and we had no axe to grind as far as that was concerned - if they wanted to be an official picket, so be it, they were the official picket.
- Q. How did you communicate to whoever of the demonstrators, initially, that that was what was proposed? - A. Well, we told the people who appeared at the front gate, "We will accept you as an official picket and we will give certain advice and information and pass on any requests to the lorry drivers".
- Q. Yes. To begin with, were the lorry drivers willing to stop to be talked to by the official picket? - A. They were certainly not very happy about it at all and initially they did not stop.
- Q. Did you do something about that? - A. Yes, I did.
- Q. What? - A. I went to the lorry drivers as they were loading coke inside the coking plant and I told them that we regarded the eight men on the main gate as an official picket and I personally asked them if on the outward journey they would stop and talk to the pickets.
- Q. Can you remember, approximately, on which day that was, how long things had been going, for example, or are you going to need to look at your log? - A. I wouldn't know which day it was.
- Q. Well, will your log help us, do you think? - A. No, it was just something that I did.
- Q. Trying to get it out another way, and bearing in mind that we start with the 22nd May, about how long had things been going by this time? - A. Well, they were spoken to from day one, the drivers.
- Q. Yes? - A. It must have been about a week later when I personally went.
- Q. I see - A. But this was possibly two days after Mr. Scargill himself was taken into the plant and he spoke to the drivers. We took him in in a Police car.

- Q. JUDGE COLES: That was for the express purpose of talking to the lorry drivers? - A. Yes, it was for the express purpose of talking to the lorry drivers.
- Q. MR. WALSH: Returning to the day when you spoke to the drivers yourself, did that result in them stopping to speak to the pickets or not? - A. Yes, it did. The whole convoy stopped on the route out of the plant and the first two drivers spoke to members of the official picket.
- Q. JUDGE COLES: That is after your personal intervention? - A. Yes, your Honour. I might add that they were still unhappy about it.
- Q. MR. WALSH: Well, that is as maybe. On the days thereafter did the lorries continue to stop and talk to the pickets or not? - A. No, they did not.
- Q. But the pickets were still there, I think you said? - A. They were, yes.
- Q. I don't know, did you make any more interventions on behalf of the pickets? - A. I spoke to the lorry drivers again and they said quite categorically they weren't stopping.
- Q. And, just to assist the Jury, do you have any right to compel the lorry drivers to stop and talk to the pickets? - A. Under those circumstances, no. The only right I have to stop any moving vehicle is if an offence is being committed or if there is danger to some other user of the road.
- Q. Now, you told us that there were several days when there were large numbers of demonstrators there and others when the numbers were much smaller. - A. Yes, sir.
- Q. Generally speaking, did things remain at the same sort of level each week or were fewer people in the end going, or more people in the end going? - A. It varied very considerably. Some days there were even four or six hundred there. On the other days I have spoken about perhaps three or four, I think even on one occasion 5,000, but I will be able to confirm that on Monday when I have my records.
- Q. And were you able to deal with the situation when, for example, say one day, a Tuesday, let us just take an example, there were just a few hundred and the following day there were several thousand, how were you able to have the necessary personnel to deal with that situation? - A. Yes, well, my intent from the outset was to police Orgreave with as few Police Officers as possible
- Q. Just pause there. Yes? - A. Therefore, instead of bringing large numbers of Police Officers actually into Orgreave I made arrangements whereby reserves would be held in their transit vans on the borders of Nottinghamshire and South Yorkshire and Derbyshire and South Yorkshire, Humberside and South Yorkshire, North and West Yorkshire and South Yorkshire.

- Q. JUDGE COLES: The County boundaries? - A. Yes.
- Q. MR. WALSH: * The nearest being about how far away from Orgreave?
- A. 20 miles to West Yorkshire beside about the same to Derbyshire.
- Q. Yes, I see - A. And I always got to Orgreave at about four o'clock in the morning
- Q. You yourself? - A. Yes, and I would assess the situation and sometimes the pickets were quite friendly with absolutely no violence at all and it was possible for my officers to be deployed in very limited numbers and there would be quite a lot of banter to and fro between the Police Officers and the pickets and the demonstrators.
- Q. When you say, "my officers", do you mean officers of the South Yorkshire Police Force? - A. No, any Police Officer who attended at Orgreave was under my command, my officers, any Police Officer.
- Q. Yes, that is why I asked you. You had arranged for people to be held in reserve? - A. Yes.
- Q. Was there a sort of regular minimum number that you had at Orgreave any day just in case or did it depend on some other circumstance?
- A. No. Starting with the 22nd
- Q. Of May? - A. Yes, 22nd May, there were several days when I would be there and there would be less than 50 Police Officers actually at Orgreave and this included such people as radio operators, staff car drivers, people of that sort.
- Q. So, you would go at four o'clock in the morning and assess the situation? - A. Yes.
- Q. And then do what? - A. Depending on the build up, I built up my strength as the strength of the demonstrators built up.
- Q. Looking at the matter generally, if it is possible to do so, from which direction used the demonstrators to arrive? - A. Usually from the Handsworth direction.
- Q. Now, Handsworth is uphill from the plant? - A. Uphill over the railway bridge, yes.
- Q. JUDGE COLES: In other words, they would arrive coming downhill?
- A. Coming down the hill towards us, yes.
- Q. MR. WALSH: And how did they arrive in the Handsworth area? Were you able to notice that? - A. Yes, I was. I visited the far side of the railway bridge on a number of occasions, on the bad days, and many were arriving in private cars, usually four to a car, some in vans, some in coaches, and many of them were parking on the supermarket car park.
- Q. Is that Asda? - A. Asda, yes.
- Q. To what extent did you get very large numbers at the bottom of the hill? - A. This is where, at Poplar Way?

Q. Yes, the bottom side. - A. I would say much smaller than the main entrance, but on some days there was a considerable build up and on one or two days a fairly large number of women and children turned up and there was an attempt made to block the road by sitting down, but generally speaking it was not of great concern to me because it was well policed and there was very little violence from the people who seemed to congregate at Poplar Way/Highfield Lane. It was of secondary worry to me, if you like.

Q. And so, although you were in overall command, which part of the Highfield Lane and the premises required your principal attention during this time? - A. I concentrated on the topside, that is, the topside of the main entrance.

Q. Now, you told us that daily there was an eight-man official picket. Where were your Policemen drawn up on the topside of the plant in order to make sure that demonstrators didn't go downhill and block the gates and so forth? - A. Well, it was a progressive build up, of course, and varied from day to day, but the location was always the same and that was about one hundred yards above the main entrance. That is where there is a large field on the righthand side of Highfield Lane, looking up towards the railway bridge.

Q. And just perhaps to identify it, without leading too specifically, Mr. Clement, it may help you if you were to look at the large continuation plan - your Honour, I am conscious that we haven't given it, formally, an exhibit number. What I propose to do, perhaps over the weekend, is to get the order of exhibits of documents that we have just put in and give them numbers

JUDGE COLES: I realise work is still being done, so it is probably just as well to leave it until the work is complete.

MR. WALSH: Yes.

JUDGE COLES: We can cope until then, members of the Jury. We know which document counsel is talking about. (Document handed to Witness)

Q. MR. WALSH: That is a clear copy, Mr. Clement. I think you are familiar with this area. I don't think you have seen the plan itself recently? - A. No, I haven't.

Q. Just orientate yourself. - A. Yes.

Q. Now, would you explain, or point, or even mark the position where your Police lines would be on the occasions when they were needed? - A. Yes. It was just about where the electric light standard number is. I think it is 23. It's just above the lane which goes off Highfield Lane.

Q. Yes. I think the Jury has seen that. That is as you go up Highfield Lane, uphill, as you say, about a hundred yards above the plant where there is a little road off to your left? - A. Yes, it was just in front of that. That is a main line road, a crossroad.

- Q. So, that means you would have, depending upon how many rows of officers you had, had the side road at your back? - A. Yes.
- Q. Now, I would like to go, please, to the 18th June. What time did you go up that day? - A. 4 a.m.
- Q. Did you have any reason to expect it to be a particularly busy day or a quiet day, or what? - A. I had reason to believe it was going to be a very busy day.
- Q. Why was that? - A. Because of certain information I had received.
- Q. And I don't know if you can give any precise answer to this question, but approximately how many demonstrators were you expecting, or did you not have any idea? Just give us an indication. - A. Well, I was expecting many thousands.
- Q. From the immediate vicinity of South Yorkshire, or from elsewhere? - A. From all over the United Kingdom, with the possible exception of Northern Ireland.
- Q. And were your expectations fulfilled or not? - A. Yes, they were.
- Q. You have told us about the previous occasions, how people arrived and where various things were parked. What happened on the 18th June? - A. On the 18th June, as I say, I was there at 4 a.m. and there was very little movement until six o'clock, or particularly after six o'clock and a gradual build up from seven o'clock onwards, and such like, and the main body of people were coming downhill from the direction of the Handsworth area, over the railway bridge, down Highfield Lane towards us.
- Q. Pause there. In what form of transportation did they come? - A. Well, I didn't leave the site. I received information, of course.
- Q. Very well. We will have to leave that to somebody else, if necessary. Who were the principal officers under your command that you assigned to the various tasks on the ground? - A. At the topside, that is where I spent most of my time or, in fact, all of my time on that particular day, was Superintendent Povey, who was assisted by Chief Inspector Hale.
- Q. Are they both South Yorkshire Officers? - A. Yes. All the commanders were South Yorkshire Officers. I insisted on that.
- Q. Now, they were the two at topside? - A. Yes, and the Poplar Way, Highfield Lane end, that side, as you have described it, the recreation ground, that was Superintendent Valance.
- Q. Had you any reason to suspect that the arrivals of the convoys of vehicles would be at a materially different time than from the other days? - A. No.
- Q. No. And just describe how things, you said, built up from that early hour. - A. Yes. I think at this stage, sir, if I may, I would like to refer to my pocket book to get things absolutely correct.

- Q. When did you write your pocket book? - A. I started to make notes after the incident had finished. I went back to the control room, which is directly opposite the main entrance and I commenced writing at 2.35 p.m..
- Q. JUDGE COLES: Were the matters you noted then fresh in your mind?
- A. They were, your Honour, yes.
- Q. Yes? - A. With the exception of specific times which I just couldn't remember during that day.
- Q. Well, you were obviously busy and as soon as you got a free moment you took the earliest opportunity to write something down and you say some of the matters in that will probably be not so fresh, notably, the particular times? - A. Yes.
- Q. MR. WALSH: Then, dealing with one thing you said. You said you went to the Police control room opposite the main gate. The Jury have seen immediately opposite the main gate is a rectangular flat-roofed building of perhaps a couple of storeys high. - A. Yes, sir.
- Q. And it appears to belong to, is it, British Steel, I think? I think it had a plaque on saying B.S.C.? - A. Yes. It had been abandoned by them because of subsidence, but we decided to use it.
- Q. So, it was an unused building at the time? - A. Yes.
- Q. Perhaps you would just tell us on, particularly, the 18th June who was installed there and what was going on there? - A. Yes. The main purpose of having a control room area was to locate communications equipment, extra telephones that we had had put in, radio equipment, of course, and housed in that building were a Superintendent who was my control room supervisor and, to explain that, it merely means that the radio set that I had was a VHF set, which is a very limited range and certainly couldn't communicate with Sheffield, therefore, anything that I wanted I went on the radio to the control room and they had other radio equipment in there which could communicate with Sheffield, and the resources arrived.
- Q. We shall hear in due course, Mr. Clement, that there were facilities for medical treatment and so forth. - A. Yes.
- Q. Where were they? - A. The main body of the ambulance service were actually housed in the land surrounding the control room. That is where their vehicles were and the main body, and their men did, in fact, throughout the 18th June there were ambulance officers who got up with the Police lines and kept very close to them.
- Q. JUDGE COLES: But their base was in the land in the vicinity of the command post? - A. In the vicinity of the command post, that was the main body but, of course, there were others down at Poplar Way and Highfield Lane.
- Q. MR. WALSH: Yes. I think we will remember that the command post has a semi circular drive with two exits and a grass verge in the middle. When you say that the medical posts were on the land of that particular building, do you mean they were portable posts? - A. No. They were ambulances.

- Q. I see - A. And they were mainly parked just inside the entrance to the command post, that is, the left-hand entrance.
- Q. As we are looking at the plan? - A. As we are looking at the plan, on the grass, to the left of that entrance.
- Q. So, we can, in fact, if you have got the small album of photographs? (Handed) I think if you look at the fourth photograph we can see that gate from across the road. - A. Yes, that is the gate and the ambulances were parked to the left of that entrance.
- Q. Inside? - A. Inside the wall.
- Q. Now, you were about to start refreshing your memory from your notebook and, dealing with the build up on the 18th June, if you would now like to do that, please? - A. My notes for the 18th June read about my arrival there at 4 a.m. and discussions with Superintendents Povey and Valance and Chief Inspector Hale, the information I received about the arrival of the coaches. At 6 a.m. I had been given certain information about a number of coaches
- Q. Yes. I just want to deal with what you yourself did and saw which deals with the build up of people and what you were required to do

MR. MANSFIELD: I wonder whether, before he goes further, he said he commenced writing at 2.35. May we know whether all the notes were written continuously, or with breaks?

JUDGE COLES: Certainly, yes, by all means.

THE WITNESS: Yes, they were continuous except that I did receive some telephone calls during that afternoon and, in fact, I finished writing the notes at 5.30 p.m..

- Q. MR. WALSH: Still in the same place? - A. Still in the same place, yes.
- Q. JUDGE COLES: So, subject to telephone calls, it was three hours' writing? - A. Three hours, sir, yes.
- Q. MR. WALSH: You have told us about six o'clock. What is the next, as it were, important time? - A. The next note I have is 6.50 a.m. where I estimated that there were 700 demonstrators facing the Police lines on the Handsworth side of the works entrance.
- Q. And that we have been calling the topside? - A. The topside, and there was a Police cordon across the full width of the road and also, to a lesser extent, across the field.
- Q. Yes, and when we talk about a Police cordon, can you explain to the Jury how the Police cordon is formed and what it looks like? - A. Yes. Initially, on every operation that I have been on throughout the strike where there was a confrontation between Police and miners, I insisted that the Police Officers always turned out on the first instance in ordinary Police uniform.

- Q. I know we are all familiar with the ordinary Police uniform, but basically what is it? - A. Well, just the uniform and the Police helmet.
- Q. And I suppose, depending upon the state of the weather, the Police uniform may be heavier or lighter? - A. Yes, or an anorak, or something of that sort.
- Q. JUDGE COLES: Are any weapons of any kind, shape or description carried with that? - A. Yes, just the normal Police truncheon.
- Q. MR. WALSH: How is that carried? - A. That is carried in a side pocket on the right-hand side.
- Q. Any shields, or anything like that? - A. No. No.
- Q. Now, you say the cordon actually formed? - A. We operate in this sort of situation on what is known as a PSU formation, being a Police Support Unit, and a Police Support Unit is one Inspector, two Sergeants and 20 Constables.
- Q. You are going a bit fast now
- Q. JUDGE COLES: One Inspector, two Sergeants and 20 Constables? - A. Yes. Now, so far as possible we never split that number and on this occasion, the 18th June, the picture would develop in this way, that initially there would be a few miners coming down the hill, we agree on the official picket and then they would be told to stand there, a hundred yards from the main entrance.
- Q. MR. WALSH: Who would be told? - A. The demonstrators as they came down the hill.
- Q. So, when you say, "We would agree on the official picket", just tell us what you mean. - A. Well, I would send a Superintendent out and say, "Speak to those people, pick eight men for the official picket".
- Q. Who picked out the eight men? - A. We merely said to them, "Make up eight men, select them".
- Q. I see. From what you have told us before those would be allowed through towards the gates? - A. They would be actually at the gate.
- Q. Yes. Now, I would like to know about the formation of the Police cordon. That is what I am asking you about. - A. Yes. As the numbers built up, let's say that there were 200 there and we would normally send out perhaps two PSUs. That is double the numbers I have just given you, two Inspectors, four Sergeants and 40 Constables, and generally, when there were relatively few miners there, it has been quite friendly.
- Q. Yes. Can I just stop you there for a moment? When you send out these two PSUs do they stand in formation or just, as it were, idle about in the road? - A. They would be told, when there are few people, few miners there, they would be told to go out and, well, the Inspectors would be told, "Form your men across the road", because that is where they normally gathered, on the road.

Q. JUDGE COLES: Even when there were smallish numbers and the expectation was that there would be customary friendly banter? -
A. Yes, your Honour.

JUDGE COLES: I see.

Q. MR. WALSH: In what way would they form themselves across the road? - A. Well, just in a line, possibly two deep, perhaps with two PSUs slightly extending on to the field.

Q. Two PSUs, you have told us, is only about 40. - A. 46 men.

Q. 46 men, yes. So, with two PSUs would you have enough people actually to have two links, or not? - A. Yes, across the road.

Q. Across the road itself, but not across the field as well? - A. No, no.

Q. Then you have said, I think, the time that you were talking about was 6.50 and you gave us a figure for about how many people you say were there? - A. Yes. My estimate was 700.

Q. 700? - A. Yes.

Q. And so, approximately how many Police Officers were out there at that time, forming a cordon? - A. Well, I would have thought, for about 700 who were causing no problems, I would think there would be five PSUs, which is 115 men.

Q. Now, at that time did you pay any attention to what was happening lower down, at Poplar Way and Orgreave Road? - A. Yes, I did.

Q. What was happening there at that time? - A. Well, there was a movement of demonstrators down there and, in fact, at 7.30 I got a radio message relating the situation.

Q. JUDGE COLES: 7.30? - A. Yes. 7.30.

Q. MR. WALSH: So, did you go down there? - A. I walked towards Poplar Way.

Q. And what was happening down there, what you saw? - A. There was a number of demonstrators who had come up from Poplar Way and had walked up Highfield Lane and that, of course, I could not tolerate because they were behind the Police lines which were formed up, looking at the people on the topline.

Q. Yes? - A. So, I had to do something about it.

Q. What did you do? - A. Well, the road was almost completely blocked. I gave certain instructions to Superintendent Valance relating to their removal.

Q. Yes. Where were you intending that they should go from their position of blocking the road? - A. Into an area of land which is below the command post, in between the command post and the company, the firm known as Orcot (?).

- Q. Yes. We only see that on the Ordnance Survey Map, that is, the big one. - Your Honour, I suspect this is the one place we didn't specifically look at this morning - But, is that, Mr. Clement, the one called the middle holding area? - A. Yes, it is.
- Q. The members of the Jury will see that - I don't think you will need to look at that any further. So, having given Superintendent Valance his instructions, did you stay there or did you return to the
- A. No, I returned to the topside.
- Q. And how were things at topside round about this time? - A. Well, they were beginning to build up in numbers.
- Q. Does that mean that there was more than the 700 or so that you had seen at about 6.50? - A. Yes, certainly.
- Q. By how much had they increased by this time? - A. Well, it was increasing all the time from that moment. They were coming down the hill in groups of perhaps 30 or 40 and that was almost continuous.
- Q. And what was the mood? - A. The mood had changed from the early sort of banter to one of hostility and missiles were being thrown.
- Q. JUDGE COLES: What time are we talking about now? It seems to be an important change. - A. We are talking, your Honour, very shortly after 7.30 a.m.. At 7.30 a.m. I went down, spoke to Superintendent Valance, gave him certain instructions, came directly back to topside and almost immediately I saw missiles being thrown.
- Q. MR. WALSH: Had there been any missile throwing or apparent hostility before you went down to speak to Mr. Valance? -
A. Certainly not so far as I saw.
- Q. And, missiles apart, what was it that indicated to you that the mood had become one of hostility? - A. There was a grouping of people and I should make this absolutely clear, not everybody at Orgreave - in fact, possibly less than 30 per cent used any sort of violence that day, but there was a grouping together of people who were obviously hostile. The stoning was coming from these groups. There were rushes towards the Police lines.
- Q. JUDGE COLES: Just a moment, please. Can you just describe again, please, what was happening in these groups? You said perhaps 30 per cent of those persons at Orgreave that day did not show any violence. I take it that - A. I'm sorry if I said that. I was wrong. It was the other way round. In other words, 70% did not show any violence.
- Q. Yes. - A. I have my note wrong - no, my note is right, but I expressed it wrongly, but those who were showing violence were in ascertainable groups. It seemed to me to be
- Q. MR. WALSH: When his Honour has written that down, can you describe what you mean? It may be difficult, but about these groupings - how do we picture them? - A. From my observations, it

seemed that whilst there was a large number of miners present who wanted to show their dissent, they were not prepared to use violence, but there were groups who were coming down Highfield Lane as groups, who were remaining as groups, who were using violence as groups.

Q. I see, and obviously we are still talking now about the early part of the build up? - A. Yes.

Q. And what sort of violence was being used at this particular time from these identifiable groups? - A. Not a great deal. There was throwing of the missiles. There were the shouts of a voice, which one became accustomed to. There were no very definite rushes towards the Police lines. The throwing of missiles was spasmodic and light and at that time I did not see any injury at all caused to any Police Officer.

Q. Yes. Well now, as we are reaching or approaching eight o'clock, did you have any reason to know precisely, or approximately, what time the convoy of lorries would arrive? - A. Yes, I would have a rough idea at that time, depending on what was happening on the motorways.

Q. Yes. - A. Because we had had occasions where demonstrators had blocked the motorways or had driven slowly in front of convoys, which had held them up.

Q. So, you would be kept in the picture by radio communication? - A. Yes. I had officers in the convoy on radios.

Q. So far, you have told us about officers who formed a cordon and the sort of clothing that they wore. Did you have available to you officers with other forms of equipment? - A. Oh, yes.

Q. Now, what sort of equipment, first of all? - A. Some officers were equipped with what we term "long shields". These are plastic shields about 6 feet long and about 18 inches wide.

Q. Are they coloured or can you see through them? - A. You can see through them.

Q. So, they are transparent, are they? - A. Yes.

Q. You said about 6 feet in height. What about width? - A. About 18 inches, perhaps a little more.

Q. And what other form of gear did they have? - A. The officers who were deployed with any form of protective equipment, which includes the shield, of course, would wear a NATO steel helmet, which is a fibreglass helmet.

Q. Perhaps not many of us served in NATO, so how similar, or at all, are they to an ordinary motor cyclist's helmet? - A. Very similar.

Q. And for what purpose did you have these men with this equipment, the long shields and the helmet? - A. Purely defensive. The role of the officers carrying the long shields is to protect the officers standing behind them from the missile throwers, the unprotected officers.

- Q. And so, starting off by having unprotected officers, what circumstances would cause you to use the long shield officers? - A. When the missile throwing became a substantial threat to my officers.
- Q. And was it up to you personally to decide when to deploy the long shield officers? - A. Yes, it was.
- Q. You have said you deployed them in front of the unprotected officers. In what way? Let us assume we have the long shield officers in front of the unprotected ones. Would they be in one rank or two? How would they be situated? - A. Initially, when the stone throwing was fairly light, they were in one rank and as stones came over and were dropping towards the front rank of the Police Officers they usually fended them off by just raising their shield. Later on, when the stone throwing became very heavy we deployed them in perhaps three ranks where the first rank would hold them, protecting their bodies, and the second and third rank would hold them above their heads so that if stones came directly towards them they would hit the front rank and if they came over the front rank they would hit the shields carried in a horizontal position.
- Q. And did it become necessary during the course of this morning to deploy the long shield carriers in the way you have just described, in the ranks of three? - A. Yes, it did.
- Q. Now, apart from the officers that carried long shields, did you have officers with a different form of equipment? - A. Yes, I did.
- Q. What was that? - A. That was round shields which are about two feet in diameter, again of fibreglass or plastic.
- Q. Did you say two feet? - A. About two feet. Something of that size (Witness demonstrates size)
- Q. That looks a little over two feet to me. That looks like three ...
- Q. JUDGE COLES: I have put two feet plus. - A. Yes, I accept that.
- Q. MR. WALSH: Are they also transparent? - A. No.
- Q. No? - A. No.
- Q. Now, that is the shield. What importance does that officer have? - A. If officers are deployed with a round shield they are also instructed to draw their truncheons.
- Q. Yes. And what about head gear? - A. Yes, they would wear the same head gear as the long shield officers.
- Q. And for what purpose were these officers designed to be there on that day? - A. They were different from the long shield officers. The long shield officers, as I have explained, were purely defensive. They would stand there and take the stoning and ward off missiles. The short shield officers were different in that they would be used to go through Police lines as a group to disperse people who were throwing missiles and to make arrests of those people who were throwing missiles.

Q. And who was the person empowered to give the order to these Policemen to go forward and make arrests? - A. Generally, myself, but in a dire emergency I had delegated that authority to the sector commanders who were at least all Superintendent rank.

Q. JUDGE COLES: That was in dire emergencies? - A. Yes, it was in dire emergencies.

Q. MR. WALSH: What sort of thing constitutes a dire emergency? - A. A dire emergency is when a large number of Police Officers are being injured by missiles or the Police line is in imminent danger of being breached.

Q. So, someone on the spot makes the decision rather than you? - A. I might have been 50 yards away or something of that sort and he would make the decision because I told him he could, yes.

Q. JUDGE COLES: And Mr. Povey was at topside? - A. Yes.

MR. WALSH: Your Honour, I am now going to go on to matters of more detail and, your Honour, it is half-past-three.

JUDGE COLES: Yes. We may adjourn until Monday.

I should perhaps just mention that it may be - I am still not quite sure - but, I mention it now in case all goes well - it may be that the pre-trial review of which there was some comment the other day will now be put in next Friday afternoon, which might seem to be of some convenience to those who leave early. I cannot promise yet, but I thought it sensible to mention it before you went away.

MR. WALSH: Yes. That is very helpful.

JUDGE COLES: We will see you on Monday morning with your log, Mr. Clement.

THE WITNESS: Yes. Thank you very much.

(The Court adjourned until Monday,
13th May, 1985)