

**Prepared for the Save Victoria Tower
Gardens Campaign, supported by The
Thorney Island Society**

20th June 2019

Security, crime and disorder assessment

**Issues arising from the proposal to build the United Kingdom Holocaust
Memorial and Learning Centre (UKHM&LC) within Victoria Tower Gardens
(VTG), Westminster, SW1P 3J**

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1. Executive summary

1.1 The proposal to site the United Kingdom Holocaust Memorial and Learning Centre (hereafter UKHM&LC) at Victoria Tower Gardens (hereafter VTG) is substantially and irrevocably flawed.

1.2 The planning application appears contrived to fit the location, as opposed to being constructed in line with holistic planning considerations, policy and regulations.

1.3 The security and infrastructure concerns raised by the proposal are not addressed in sufficient detail and need much greater clarity. Some assumptions made are at best extremely optimistic.

1.4 The proposal fails to meet the two most important stated objectives of the UKHM&LC. It also completely avoids addressing security considerations in any detail, thus failing the test set out in paragraph 95(a) of the National Planning Policy Framework (February 2019) requiring the applicants to do so.

1.5 Firstly, Parliamentarians have given broad, cross party support on the basis that MP's and staff should pass regularly through the grounds of the memorial using it as a stark reminder of the horrors of history. To achieve that objective would require a memorial sited in or near Parliament Square, on the route between the Palace of Westminster and Portcullis House. Very few of our busy and pressured MP's and staff will ever take the detour required to regularly go to walk through VTG as this objective implies.

1.6 Secondly, this proposal significantly devalues the vital learning element of UKHM&LC. The proposal could be seen as an attempt to hide the horrors of the Holocaust from the light of day by constructing it underground. Insufficient space to construct a meaningful learning centre within VTG renders this proposal the historical and cultural equivalent of a drive through fast food experience.

1.7 Thirdly, it is claimed that the proposal would not disrupt normal users of the park, despite the proximity of potentially long queues of UKHM&LC visitors queuing for security checks to children playing in the (slightly) curtailed playground area and the inherent difficulty for normal park users to enjoy themselves peacefully right beside a memorial to the world's greatest horror.

1.8 There is no explanation as to why this proposal is not located at a purpose built site at the Imperial War Museum, some 0.8 miles from VTG.

1.9 This proposal;

- Fails to deliver the intent to produce a lasting, world-class display
- Is potentially offensive to the memory of the holocaust atrocities
- Delivers destruction of a scarce green space

- Deprives the existing residential and business community of a much loved space for quiet contemplation and peaceful enjoyment
- Shoehorns the build into an area without infrastructure to support the anticipated 10,000 footfall per day
- Increases the potential for loss and damage against a range of extremist ideological threats

1.10 This proposal is a simple example of 'right idea, wrong place'.

2. Background to the commission of this report

2.1 This report is prepared for use by the Save Victoria Tower Gardens Campaign, supported by The Thorney Island Society to challenge the proposals to site UKHM&LC within VTG and has been built around the terms of reference provided for that purpose.

2.2 This report sets out the security implications for the proposal to site UKHM&LC at VTG contained within the documents produced in December 2018 on behalf of The Secretary of State for Housing Communities and Local Government. Limited operational details are currently available as this proposal contains only scant information as regards arrangements on this site itself and even fewer around issues connected with the construction phase.

2.3 Broader more strategic security implications are simpler to consider. The UKHM&LC project is an essential public service, arguably never more needed in society than now, when our politics are so polarised and in danger of veering ever more to the right. The case to locate UKHM&LC in VTG is unconvincing, the learning centre would positively benefit from being located elsewhere in London, perhaps within a museum environment, where the history surrounding the Holocaust can be properly set in context with the other history of the same period.

3. The proposal

3.1 The current proposal is that both the National Holocaust Memorial and the associated Learning Centre should be co-located within the southern end of VTG.

3.2 There has been considerable preliminary debate regarding this proposal, some transparent, a considerable amount hidden from public scrutiny. Many Parliamentarians have indicated support for the proposal. It is difficult to see how such support would remain were the full facts and the alternative opportunities detailed for their consideration.

3.3 VTG does not lend itself to hosting a sophisticated educational centre. The lack of space to construct a learning centre and supporting infrastructure, when balanced against the broad range of facilities available less than a mile away at the Imperial War Museum is illogical. That site, situated in the South London regeneration zone, is tailor made to deal with the needs of students and visitors of all ages, providing all the space and facilities that large numbers of student visitors require to make educational visits a meaningful proposition.

4. The Venue

4.1 VTG is a small, local park situated to the south of the Palace of Westminster and Parliamentary Estate. It is a very well used public park, frequented by visitors and local residents, with many employees from business and commercial environments nearby using the gardens during their working day.

4.2 The area is an important local resource, offering a playground for parents to bring young children. It has small toilets and a small café and is also already home to a number of monuments erected as part of the UK's heritage.

4.3 The proposal to take this land from public use is a matter of serious concern to many people, who will inevitably lose a significant amount of precious green space should permission be granted. This loss will be prolonged during the building phase, reducing once building has been completed if security assumptions remain as the authors of the proposal suggest.

4.4 It is widely accepted that preservation of green spaces is linked to the maintenance of good physical and mental health, particularly in such a densely crowded city environment as Westminster. The memorial and learning centre would irreversibly reduce this scarce green space and remove it from use for residents, tourists and the business community providing no viable alternative in its wake. It lies south of the UNESCO World Heritage Sites of The Palace of Westminster and Westminster Abbey, therefore requiring additional considerations and it also lies within the Smith Square conservation area.

5. Threat Assessment

5.1 The threat assessment for this proposal is complex and is influenced by its proximity to the Parliamentary estate. It is clear that alterations will need to be made to the vehicle barrier security arrangements at the Southern end of the Parliamentary Estate, at Abingdon Street, to facilitate the additional visitor footfall anticipated through entrance 1 to VTG. The UKHM&LC lies within the Government Security Zone and will therefore impact on arrangements for other sensitive departments situated very nearby. In determining the level of threat to the site of the UKHM&LC it is apparent that there are two broad sources of threat.

5.2 The principal source of threat comes from Jihadi inspired terrorists and is firmly based on evidence of an increase in Islamist inspired atrocities against Jews and Jewish targets across Europe over the past ten years.

5.3 UKHM&LC will not be a place of worship, however, it would be vulnerable to attack as a potential high value target because of the proposal to site it adjacent to the Palace of Westminster and its clear links to Jews and the Jewish faith. The proposed location is in close proximity to iconic sites yet would not benefit from the same degree of protection and security necessary to protect against such threats. To this end, there is an inherent degree of vulnerability should this proposal go ahead. There is recent precedent for Jihadist inspired attacks on a Jewish related museum. On 24th May 2014, Mehdi Nemmouche murdered four people at a Jewish Museum in Belgium, clearly demonstrating that a clear link to the Jewish community is sufficient justification for a Jihadist attack on what was considered a soft target by comparison to others.

5.4 The Belgium attack was one of four significant terrorist attacks against Jewish targets between 2012 and 2019¹ that resulted in fatalities. The attackers were inspired by extremist ideologies or current tensions in the Israeli-Palestinian political situation. The proposal to site UKHM&LC in such close proximity to Parliament, with the array of national and international news cameras constantly in attendance, would make it a high value target for those individuals wishing to promote their cause on the world's stage. It is the very nature of the extremist to want to gain as much publicity as possible for their cause, so in this context, VTG would be a gift to them. The very proposal to site UKHM&LC at VTG actually magnifies the risk. Were UKHM&LC to be sited at the Imperial War Museum, as in an earlier and much more plausible proposal, this risk effect would be very much diluted by being 'hidden in plain sight' amongst many other, historically related artifacts.

5.5 Beyond the four attacks resulting in fatalities, there have been innumerable other incidents of criminal activity targeted against Jews and Jewish targets, creating a significant level of fear and anxiety amongst people sharing the Jewish faith. It may well be the case that this proposal further raises those fears within

¹ <https://ctc.usma.edu/terrorist-attacks-jewish-targets-west-2012-2019-atlantic-divide-european-american-attackers/>

the Jewish community, by appearing to single them out for preferential treatment in such a high profile location. The attribution of significant public funding lends weight to this argument, speaking directly to those harbouring grievances against Jews and their perceived interests, even though the UKHM&LC is not in fact a Jewish faith based project. The lack of sophistication amongst those prepared to enact such attacks would result in them simply linking this project to the Jewish faith and interests.

5.6 The second potential source of threat arises from the emergence of extreme political ideologies. Principally the extreme right wing movements, but also from elements of the extreme left. Society in the UK and around the world has noted an alarming rise in extreme right wing groups and individuals, eager to share white supremacist or Neo-Nazi ideologies with anyone prepared to listen. Whilst the incidence of fatalities from such attacks has been restricted in the past decade to the USA, there are clear and troubling indications that the extreme right wing is on the rise across the UK and Europe, and with it the threat to Jews and Jewish interests. From the pseudo political groups like the English Defence League to much darker and more sinister groups, a site such as UKHM&LC would be a focal point for direct action, right under the noses of the Parliamentarians against whom they also hold grievances. Fuelled by social media and the Internet, these groups would regard UKHM&LC as a rallying point, immediately beneath the watchful gaze of the broadcast media's cameras.

5.7 UKHM&LC would offer such individuals or groups the opportunity to combine an attack against a target overtly perceived as a Jewish interest and an attack on our Parliamentary democracy and freedoms.

6. Physical factors and vulnerabilities

6.1 The proposed design of UKHM&LC reflects the building's purpose in making it an accessible space for the public to visit. Early estimates suggest 1 million additional visitors to VTG going to view the memorial or to visit the learning centre. Peak daily footfall is estimated at 10,000, some to simply visit the Memorial, others to visit both sites.

6.2 At present, though VTG is located alongside the Parliamentary estate, it is an open and easily accessible space, protected by cast iron railings and gates (approximately 5 feet tall) when the park is closed to the public at night. To the East lies the river Thames and, though a much more difficult prospect for extremists, another potential point of vulnerability for UKHM&LC if located within VTG.

6.3 The roadside boundary of VTG is Millbank (A3212), becoming Abingdon Street as it progresses North. The pavements are relatively narrow and currently without railings to separate pedestrians and traffic. This route would have been a cycle superhighway but was judged to be too narrow, given the volume of traffic, though it joins two other cycle superhighways in a direct route across Westminster and is very heavily used by cyclists. The A3121 is a very busy road and bus route through central London in its own right, as well as a direct emergency response route to Parliament.

6.4 There are very limited parking and waiting areas nearby. It is difficult to envisage where coachloads of tourists and students coming to visit the Learning Centre would be able to safely disembark their transport to make their visit. The assumption that a significantly large number of the visitors will enter VTG through entrance 1 will inevitably necessitate a significant restructure of the anti-terrorist vehicle barriers and pavement restrictions at the Southern end of the Parliamentary Estate, as existing pavements are already significantly narrowed and very busy. Accessibility by disabled visitors or those with reduced mobility will be extremely difficult via this route. Managing groups of excited schoolchildren across the busy road is little short of a disaster waiting to happen. Significant road safety arrangements would be required to make this a viable proposition.

6.5 These factors combine to make the UKHM&LC vulnerable to vehicular attacks without the addition of significant improvements in the physical security of the boundaries, either by concrete blocks or barriers or other methods. There is a passing reference to bollards within the current proposal, but no further details are set out. It would further restrict the highway and footpaths to erect such barriers, erecting them integrally to the current fencing could cause significant damage to the trees and would require detailed survey and considerations. A suicide vehicle borne improvised explosive device or marauding close quarters attack could easily be mounted on this location.

6.6 A terrorist intent on causing serious harm could simply drive a vehicle at speed through the boundary fencing, between gaps in the trees, going straight

into the park. With only bollards to navigate around or defeat through brute force, this leaves the area very vulnerable. Once within the park area, the flat and open layout of the grass and in particular the children's playground, coupled with a hard-standing area within the visitor centre, lends itself perfectly to an explosion or close quarter attack generating significant casualties. Such a vehicle borne attack could be more easily achieved by approaching its target from the South. Either by crossing Lambeth bridge, coming down Horseferry Road or straight along Millbank from Vauxhall Bridge. The roundabout on the Western side of Lambeth Bridge provides an opportunity to accelerate into VTG by breaching the fence along the Millbank side and delivering an IED or attacker directly into the children playground or paved courtyard area between the entry pavilion and the learning centre itself. Indeed, it was this methodology that was employed to such dreadful effect only a very short distance away by Khalid Masood on 22nd March 2017. By creating a target overtly connected to the Jewish faith alongside Lambeth Bridge raises questions about the levels of protective security for pedestrians on that bridge and the other vehicle approach routes to VTG, given that the proposal is away from the measures implemented to protect pedestrians shortly after Masood's attack. These factors must be subject of a detailed survey and report by a Counter Terrorism Security Coordinator (CT Sec Co), which would draw all threats and risks together into a coherent and comprehensive assessment and plan.

6.7 Measures to mitigate such attack methodology are realistically restricted to strengthening the outer perimeters and erecting barrier style defences at the roadside. Given the insufficient space to do this on the highway or footpaths and the lack of footpath space already noted, multiplied by the significant increase in anticipated footfall this proposal creates a 'perfect storm' of vulnerabilities. With regard to the VTG boundary itself, implementing the necessary protective measures would have a devastating effect on the mature trees and shrubs that line the Western boundary of the park. It is worth noting that such vehicle security measures are currently being installed along Piccadilly, on the North Western side of Green Park. These barriers are presumably being installed to protect tourists and visitors to Green Park, which arguably offers nothing of particular value to an extremist as a target other than numbers of pedestrians.

6.8 The adjacent Parliamentary estate is protected by armed police patrols and significantly enhanced security measures; VTG is not and will not be. This makes VTG a more attractive and softer target for an aspiring extremist than the Parliamentary estate next door or the Security Service building to the immediate South of VTG, particularly when you consider that the world's media would have a front row seat. Both Parliament and the Security Service buildings are iconic, high value targets for Jihadist sympathisers. Demonstrating the capability to mount an attack between these two sites would be a major coup for any affiliated organisation or group.

6.9 Security patrols would be required within VTG to prevent criminality day and night. The Holocaust Memorial itself would be a magnet for low-level criminality of the kind seen recently directed toward other London Monuments such as the Bomber Command Memorial in Green Park. Constant vigilance would be

required to ensure that the memorial was protected from graffiti and damage that will further restrict the use of VTG by the public for peaceful and quiet contemplation. Given the current state of politics in the UK, the rise of the right wing and their sympathisers, such acts of damage are likely to become commonplace unless significant additional arrangements are made for security within VTG. Given the absence of any clear indications in the proposal, it can only be assumed that the organisation tasked with operating UKHM&LC will become permanently responsible for managing the security within the UKHM&LC site itself, within the confines of VTG itself and the interfaces with Police at the VTG park entrances. This will require significant, on-going investment and resources to manage.

6.10 A person borne IED would be an equally attractive option for a terrorist intent on attacking such a visible Jewish-related target, whether suicide or not, without sophisticated security screening similar to that employed within the Parliamentary Estate, it would be easy for a person to carry such a concealed device into the memorial or learning centre and deploy it with devastating consequences. The proposed 20-second security checks at the point of entry cannot seriously hope to act as a deterrent to any such extremist concealing a weapon, nor give security staff a fighting chance of engaging with a person presenting an overt threat. Given the volatile nature of the Israeli-Palestinian political environment and relationship, a threat could arise in a moment as a consequence of events on the opposite side of the globe that it would be almost impossible to identify or mitigate and extremely difficult to brief staff in advance about.

6.11 If VTG is approved as the location for the UKHM&LC, a lower level of disruption could easily be caused by persons willing to use bomb hoaxes to disrupt the learning centre. Any such hoaxes would necessitate evacuations and searches of the building and adjacent park areas and could impact on day-to-day business in other government buildings nearby.

6.12 The proposal makes scant reference to security measures. One of the few references made speaks of an aspirational 20-second security check for visitors entering the site. Such an estimate is ill conceived and fatally flawed. A 20-second check equals no meaningful security check. No checks of any depth or substance can be carried out in anything approaching this short time. It is clear that there would be effectively no security and the estimates for queues and infrastructure are deeply flawed. Additionally, there is no detail about how queues could be managed within or outside the perimeter of VTG. The proposal references pre-booked groups arriving in half hour time slots. This is the methodology applied at Buckingham Palace to manage pre-booked visitors. One only has to casually drive by the large queues outside Buckingham Palace to see the inherent flaws in this assumption. There can be no doubt that there will be large groups of people queuing for entry, providing a further soft target for extremists.

6.13 The open nature of VTG, coupled with its proximity to the road make UKHM&LC very vulnerable to objects being thrown. This could be a brick or

piece of wood, or it could be a homemade bomb or grenade. A relatively capable teenager could throw a cricket ball into the confines of UKHM&LC from the footpath of the A3212 with relative ease. Such a missile would reach anywhere in the UKHM&LC courtyard and could also be made to roll down the steps from the courtyard into the Learning Centre. It is also not difficult to imagine the damage an extremist could do by simply dropping a device onto the heads of visitors as they enter the learning centre from the mound above. Much lower level risks are posed by youths intent on causing trouble. Simply by dropping fireworks or other objects from the mound straight into the well area at the entrance to the learning centre would cause injuries, disruption and damage. Without security checks on all persons entering VTG after the centre is opened these vulnerabilities cannot be mitigated.

6.14 During the building and development phase, it is highly likely that large areas of VTG will need to be closed for the public. Large excavation equipment and building materials will inevitably be readily accessible at the site, these things would need to be very well protected from both extremists and the anti-social alike. In the event of further disruptions and protests at Parliament that we have witnessed recently, a building site conveniently situated in VTG would represent an instant armoury for those who are prepared to use violence to make their protest. The only remedy here is to severely restrict public access, or indeed to close the park in its entirety to the public whilst construction is taking place. This would of course completely negate the intention of the proposal to avoid any disruption to normal park users.

6.15 The same situation could of course arise, given the current open nature of the park, if there was a major security event after the opening of the UKHM&LC which was serious enough to lead to the temporary closure of the park; that might well have to be followed by the permanent introduction of security and bag searches at all entrances to the park and/or the complete closure of some of the current entrances to the park.

7. Assessing the risks

7.1 Accepting that the two biggest threats to a UKHM&LC sited within VTG are of terrorist attacks and social protest, the risk of terrorism is relatively low by comparison with the risks of protest activity. That said however, one could not have predicted the dreadful events of 22nd March 2017 and a similar risk assessment conducted prior to that date would arguably have drawn a similar conclusion and failed to properly identify the likelihood of that type of attack occurring.

7.2 The fact remains that a project to site UKHM&LC at VTG, with overt links to issues that speak directly to extremist ideologies and narratives leaves UKHM&LC more vulnerable to becoming a target of a violent attack. For those reasons I assess the risk of such an attack as falling within the 'moderate' band (using Low, Moderate or High Risk banding to assess).

7.3 The risks of disruption to the public and residents from political protest, single-issue protest or a fixated individual are both obvious and higher. In each instance, the objectives of people undertaking this activity are generally to create disruption, generate a headline and bring maximum attention to their cause.

7.4 This proposal appeals to a number of potential protest groups. There are the obvious world politics issues around events in the Middle East, which are likely to make UKHM&LC a focal point to rally interested parties at each end of the political spectrum. Equally, environmental activists have very recently demonstrated a willingness to take highly effective direct, non-violent action in support of their cause. This exceptionally complicated underground construction project is likely to inflame those activists, at the very least during the lengthy construction phase owing the potential damage caused and loss of the public space. Additionally, the inherent risks of flooding raised by the Environment Agency must also be considered a multiplier for risks. VTG would need to remain completely secured during this period to prevent the 'occupation' of trees 'at risk' by environmental or climate change activists, leading to the gardens having to be closed to the public as a preventative measure. Tactics employed by movements such as Climate Extinction have demonstrated the ability to effectively bring London to a halt and VTG could be well used by such groups as a marshaling area or focal point for protest. The obvious clash with Mayoral promises around protecting green space and trees in particular provide a starting point.

7.5 Organised protest close to or within VTG during the building and development phase, would significantly disrupt the public's ability to enjoy the peaceful surrounding VTG provides today as access to materials to use as missiles would need to be quickly prevented by the police. The addition of substantial defences against vehicle borne attacks along the boundary would cause damage and disturbance to the mature trees and shrubs there, altering London's landscape permanently. As discussed above, ready access to building materials by violent protesters, even if such protest were unconnected with this

proposal, mean that access to VTG must be significantly restricted for an extended period.

7.6 The very real risk that the intrinsically peaceful nature of VTG as a park will be removed by this proposal is immediately apparent. The security implications around public access to VTG itself will mean inevitably that anyone entering the confines of VTG will need to be screened even if the site of the UKHM&LC within VTG is target hardened significantly. There is no information on the proposals to manage visitors within VTG in the winter months, when the public access closes at dusk. The proposal is for UKHM&LC to operate into the early evening. How will VTG be secured and cleared at night? How will the inevitable and unwelcome light pollution arising from the lighting along the footpath running North to South across the park from entrance 1 to the UKHM&LC be managed? Given that there will be many people queuing at peak times of the day, how will their safety and security be managed?

7.7 If implemented, this proposal will completely change the use of this public space forever.

8. Conclusions

8.1 An assessment of the proposal on the facts as they are known today reveals clear concerns that this proposal is a noble idea, poorly located.

8.2 The security implications have been glossed over and the test set out in paragraph 95(a) of the National Planning Policy Framework (February 2019) has not been met. If some implications have been considered, then those considerations have been hidden from public scrutiny and cannot possibly have been sophisticated enough, given some of the assumptions made in the proposal documents.

8.3 The UK threat level remains at 'Severe' meaning that an attack is highly likely. Given that both Al Quaida and ISIL have explicitly exhorted their followers to attack Jewish targets or interests, this means that a site of this nature is immediately a potential target.

8.4 If the true intention of planners, architects and Parliamentarians is to provide a meaningful, lasting and comprehensive learning experience to the young people of the 21st century, then siting the Learning Centre in VTG makes no sense at all.

8.5 A learning centre needs space to place the events it sets out to document in context with other contemporary world events from the early 20th century period. Being located within a museum setting built for the purpose is the only meaningful way to properly achieve that objective.

8.6 The Imperial War Museum is a substantial site less than a mile away from VTG, with Holocaust Galleries currently in place. It is a well-appointed museum, equipped with the necessary infrastructure to support significant visitor numbers in a proper learning environment. Siting the Learning Centre there can only enrich the learning experience intended for this project.

Report prepared by

A handwritten signature in black ink, appearing to read 'Adrian Tudway', with a horizontal line underneath the name.

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