**SECTION 77 OF THE TOWN AND COUNTRY PLANNING ACT   
1990 (AS AMENDED)**

**CALL IN INQUIRY INTO THE PROPOSED DEVELOPMENT OF THE UNITED KINGDOM HOLOCAUST MEMORIAL AND LEARNING CENTRE LOCATED WITHIN VICTORIA TOWER GARDENS, MILLBANK, LONDON SW1P 3YB**

**PROOF OF EVIDENCE OF M A BRITTLE CEng MSc CSyP RSES**

**On behalf of**

**THE SECRETARY OF STATE FOR**

**HOUSING COMMUNITIES AND LOCAL GOVERNMENT**

**TOWN AND COUNTRY PLANNING**

**(INQUIRIES PROCEDURE) (ENGLAND) RULES 2000**

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## **1.0** **QUALIFICATIONS AND EXPERIENCE – M A BRITTLE**

* 1. I am a Chartered Security Professional, a Principal and Steering Committee Member of the Register of Security Engineers and Specialists and a Certified Information Systems Security Professional.
  2. I hold the degrees of Bachelor of Engineering (with Honours) in Mechanical Engineering from the University of Salford and Master of Science in Weapon Effects on Structures from Cranfield University. I am a member of the Institution of Mechanical Engineers and a Chartered Engineer with the UK Engineering Council.
  3. I have 30 years’ experience in the field of security spanning its practical application during 16 years in Her Majesty’s Armed Forces as an Army Officer, followed by 14 years in the commercial sector working both as a consultant and for security suppliers. This has included being the Head of Security Consulting for W S Atkins Limited and the Security Specialist Team Leader for Honeywell across Europe, Middle East and Africa. My career has been heavily influenced by involvement in countering terrorism.
  4. I have advised and provided security solutions for a wide variety of private and public-sector clients on projects throughout the UK, Europe and globally. Projects have spanned many sectors and include experience in commercial, mass transit, pharmaceutical, industrial, sports and stadia, critical national infrastructure, public events, healthcare and high-security government sites.
  5. During my time leading security teams I have gained experience working on the London 2012 Olympics, HS2, NEOM Industrial City Security masterplan, Crossrail, Department for Works and Pensions, Fulham, Crystal Palace and Chelsea football clubs, Harrods, various rail station projects and numerous airport developments. All of these roles have involved the requirement for open interaction of the developed sites with the public for their success.
  6. I play an active role in the security community, and have spoken on security at a number of events, as well as being a visiting lecturer at University College London on disaster recovery and risk reduction in conflict zones. I have also acted as a senior advisor for security and intelligence to both UK armed forces and the Afghan National Army, as a Senior Instructor at the UK Defence Intelligence and Security School, and a Lead Instructor in Kabul.
  7. I am very familiar with the Application Site and the surrounding area, which I have visited on several occasions.
  8. I have read all the relevant background information and have been assisted by the same colleagues who worked on the development of the security scheme and made such enquiries as I consider to be necessary to fulfil my duties as an expert witness.

1. **QUALIFICATIONS AND EXPERIENCE – WSP UK LIMITED**
   1. WSP is one of the world’s leading engineering professional services firms, with 50,000 personnel, based in more than 550 offices, across 40 countries. In the UK, WSP works from 50 regional offices employing nearly 8,000 skilled personnel who provide a broad spectrum of engineering and project services.
   2. The Security Practice is within the Property and Buildings Division of WSP, and its primary focus is design and consultancy of security, risk and resilience within the built environment. The scope of services offered span from the understanding of threat and risk, conceptual solutions and problem solving, through to full design services aligned to the Royal Institute of British Architects design stages.
   3. The Security Practice works individually and within multi-discipline teams to achieve the right project outcomes, providing proportionate and appropriate security solutions that are operational efficient and will provide scalable solutions to meet evolving risks.
   4. The Security Practice is staffed by security professionals from a variety of backgrounds including those who have gained experience and qualifications from the police, military, operational security, security suppliers and a variety of consultancy appointments and embedded in client organisations.
   5. WSP take continual professional development and life-long learning seriously and the Security Practice has affiliations with the Institution of Mechanical Engineers, the Institution of Civil Engineers, the Register of Security Engineers and Specialists, the Security Institute, the Institute of Strategic Risk Management, (ISC)2, the Association of Security Consultants, the Institution of Engineering and Technology, the Institute of Civil Protection and Emergency Management, American Society for Industrial Security and the International Security Managers Institute.
2. **SCOPE OF EVIDENCE**
   1. As my evidence, and the evidence of others will demonstrate, the UK Holocaust Memorial and Learning Centre (UKHMLC) has been carefully designed by suitably experienced designers to complement and respect the character of Victoria Tower Gardens. The proposed development is confined to a small part of the Gardens. Sensitive planting and landscaping will enhance the visual and amenity value of the gardens to create a space for both visitors and local residents to enjoy. The security overlay is appropriate for the proposed development in the Gardens without being overly intrusive or visually distracting to detract from the Gardens, various Memorials and Learning Centre.
   2. A good amount of the detail is sensitive and therefore not prudent to be released into the public domain as it would potentially compromise the operation of the UKHMLC.
   3. My evidence deals with security matters arising.
   4. My evidence is set out as follows:
3. In the next section, I describe my involvement with the project and the process undertaken in developing the security solution;
4. In Section 5, I consider the main issues raised by the objectors to the proposed development upon security grounds and provide my responses to these objections. This will address the main issues raised through the Planning Application and the Statements of Rule 6 party’s.

Where my evidence draws upon the design by others, I have referenced the relevant designers.

1. **INVOLVEMENT**
   1. WSP were appointed as the engineering designers for the proposed development in December 2017. The scope of the appointment for design purposes included for the completion of Concept (RIBA stage 2), Spatial Coordination (RIBA stage 3) and Technical Design (RIBA stage 4) for security engineering.
   2. The majority of the assessment work and advisory work was undertaken by myself.
   3. Technical design was undertaken by the wider security team, guided by myself.
   4. The security development commenced with understanding the project brief and the vision for the UKHMLC, including constraints that would affect the security design related to location, proximity to other locations, such as the Palace of Westminster, Westminster Abbey and business/residential buildings.
   5. A threat and risk assessment was undertaken for the proposed development that took account of both terror and crime related threats.
   6. Early in the design process liaison was undertaken with the Metropolitan Police Service Counter-Terrorism Security Advisor (CTSA), a Centre for the Protection of National Infrastructure (CPNI) liaison and with the Community Security Trust (CST) whose mission is to help enable the protection of the British Jewish community, through reducing the risk of antisemitism, antisemitic terrorism and hate crimes.
   7. The above advisors from the Police, CPNI and CST were then involved in the security solution development during each stage of design. Where a point of clarification was raised, these were discussed, where appropriate workshopped and an agreed actions adopted.
   8. Each element of the security design was carefully considered to provide the required level of security indicated from the threat and risk assessment, but balanced against the sensitive nature of the site, both for normal Garden usage, and the area of the UKHMLC.
   9. Where required, specialist assessments, such as a Vehicle Dynamics Assessment were completed, along with liaison with other potential security enhancement schemes in the area where there may be an interface.
   10. The effects of blast loading and damage were carefully considered and resulted in the inclusion of the Entrance Pavilion to achieve a desired security effect. Material selection and standards were applied across the multi-discipline team to ensure that additional risk was designed out and the vulnerability of visitors taken into account.
   11. The methodology of terrorism attacks was considered throughout, and suitable mitigation and management measures included in the security solution.
   12. Liaison was undertaken with CPNI specialists on certain areas of technology design to ensure that the project had considered the full spectrum of appropriate options to provide security for the development and surrounding Garden.
   13. Comparison studies were undertaken to ensure that the UKHMLC was also proportional to other like facilities in London, and that the development of security elements, like the Detection Requirements Matrix for searching and screening were appropriate. The study looked at entry requirements at the following locations: JW3 – The Jewish Community Centre, Westminster Abbey, British Library, Jewish Museum (Camden), Fulham Football Club, National Portrait Gallery, Charing Cross Station, Covent Garden.
   14. The Police CTSA forwarded the design documentation to the Police Designing Out Crime Officer (DOCO).
   15. No objections were received from the Police CTSA or DOCO.
   16. No objections have been received from CPNI.
   17. No objections were received from CST.
   18. Details of specific elements of the security solution that would have a physical interface with the Palace of Westminster have been shared with their security team.
2. **MAIN ISSUES**
   1. The main objections raised through the Planning Application and the Statements of Rule 6 party’s are presented in this section. I will consider each issue individually, but having regard to all these comments, I consider the key issues for determination are:
3. That the proposed development causes an increased security risk and may increase terrorist targeting of the location; (CD 5.26)
4. That the proximity of the Memorial to the playground will cause child protection issues; (CD 5.26)
5. That security is likely to mean more checks at the entrance to the Gardens for everyone, whether intending to visit the gardens or not; (CD 5.26)
6. The road (Millbank / Abingdon Street) will have to be closed and extra security cars arranged if, as has been suggested, the Memorial will become a regular stop for important foreign visitors; (CD 5.26)
7. It will be necessary to fence off all of the area around the fins and sloping grass otherwise graffiti will appear on the fins and be burnt into the grass with weed killer;
8. Matters relating to the report, Security, Crime & Disorder Assessment, prepared for The Thorney Island Society & Save Victoria Tower Gardens dated 20th June 2019 (CD 5.35). The objections for consideration being:
   1. Avoids addressing security in any detail;
   2. Attacks on Jewish related sites;
   3. The site is vulnerable to vehicle attacks;
   4. The site must be subject to a detailed survey and report by a Counter-Terrorism Security Coordinator;
   5. The robustness of security checks on entrants;
   6. Paragraph 95(a) of the National Planning Policy[February 2019] has not been satisfied. (CD 1.1)

***That the proposed development causes an increased security risk and may increase terrorist targeting of the location.***

* 1. The placement of the UKHMLC within London may increase the localised threat in that area regardless of location. Unfortunately, we still live in times where the use of violence and criminal acts will be perpetrated against elements of British society. These acts are becoming less predictable with the growth of low sophistication attacks that require little skill or logistic support.
  2. Whilst the UKHMLC could be viewed as a high value target, there is also a deterrent effect that will come from a professional security solution at the site. This may be further enhanced by the existing security measures and rapid response to any incident that may occur in this area adjacent to the Palace of Westminster.
  3. The threat and risk assessment undertaken took account of the likely threats and risk severity that would come from the proposed development in the Gardens. Informed by the risk analysis, proportionate security measures were then designed to provide an appropriate response.
  4. I think it is also vital to remember that the security levels at the UKHMLC are in the highest quartile of protective measures when compared to other visitor and culture centres within London.
  5. It would not be possible to remove all the risk from building the UKHMLC in any location, because doing so would enforce a ‘fortress mentality’ in its design, that if nothing else, would be inappropriate for the Memorial given the history that has driven the need for the UKHMLC.
  6. Further, I believe that a disproportionate response from security, or the move of the UKHMLC to a lower profile site, potentially points to a degree that as a society we can be influenced by terrorism, and thus, potentially that terrorism is already having the desired effect.

***That the proximity of the Memorial to the playground will cause child protection issues.***

* 1. It must be assumed that the ability for children to play at the playground in safety only comes from it being a supervised activity. I believe this is an essential part of any public play area activity, and that a responsible adult must always be present.
  2. The playground will be separated from the Memorial, and therefore territorial reinforcement of the boundary of the playground will be established. Thus, this will also define its use and during the times when the Garden is open should deter mis-use of the playground.
  3. The playground in the Garden is currently a fairly isolated location when the Garden is quieter. The presence of the Memorial will add an ‘active frontage’ providing the potential for support should something happen to a child or guardian.

***That security is likely to mean more checks at the entrance to the Gardens for everyone, whether intending to visit the gardens or not.***

* 1. The security solution has been developed to provide assistance at the entrances to the Garden only when peak periods are expected, and on the areas immediately in front of the Entry Pavilion. Security checks will not occur until a visitor reaches the Entry Pavilion.

***The road (Millbank / Abingdon Street) will have to be closed and extra security cars arranged if, as has been suggested, the Memorial will become a regular stop for important foreign visitors.***

* 1. It is reasonable to assume that important visitors will wish to attend the UKHMLC whilst in London.
  2. Security at UKHMLC is generally designed to meet the day to day requirements of the site, but has scalability to allow for higher security events. For important foreign visitors it is likely that additional security will be provided through an operational overlay covering their arrival, time at the UKHMLC and their departure.
  3. In the majority of cases no road closure might be needed. For the minority of cases, it is more likely that a rolling road closure, or temporary closure would be undertaken to facilitate the visit, thus the level of disruption would be considered to be low. Additional security, either by the Metropolitan Police Service, or visiting national protection services, is unlikely to cause further disruption through the use of additional officers in close proximity to the UKHMLC.
  4. The transit time from the pavement area into the Garden is very short and quickly covered, thus reducing the need for vehicles to be kept kerb-side for extending periods of time.
  5. Other options would also be available for visits, including where ministerial sponsored, to bring visitors direct from the Palace of Westminster, avoiding all transit along the roadway. Thus, providing an extended pedestrian route through the Gardens to the UKHMLC.
  6. It is anticipated that visits of a high-profile nature would be organised to not coincide with peak traffic periods or high usage periods of the Garden as part of a holistic security approach.

***It will be necessary to fence off all of the area around the fins and sloping grass otherwise graffiti will appear on the fins and be burnt into the grass with weed killer.***

* 1. The UKHMLC will need to have a perimeter to divide what is classed as controlled space and what is classed as uncontrolled space. In locations the fins will form part of the perimeter and will therefore not have an additional ‘fence’ in front of them. This is the same principle as if the building had no stand-off, the façade would form the perimeter.
  2. Materials that form the perimeter, and generally, the building exposed faces are robust and relatively hard to damage. Whilst they will be susceptible to graffiti, where possible they will be treated to enable the swift and easy removal of paint etc. Without placing a complete fence around the site, making it an island site and potentially giving it an undesirable ‘look and feel’, the facades, including some of the fins will be susceptible to graffiti.
  3. Even if a fence was to be installed, the delay timings for fences to be scaled remain modest, with a 3.0m fence offering potentially 30 seconds delay. Taller fences may offer some increase in delay time, but they will start to take on the demeanor of a ‘prison’.
  4. The landscaped areas whilst part of the Memorial, are also an element of the Gardens, and therefore as with all grassed areas inside the Garden, will remain ‘unprotected’ other than by the original Garden perimeter fence. Whilst this offers little in the way of delay to entry, as above, increasing the height of this fence will add only seconds to the delay achieved.
  5. Given the nature of the site, and those who will seek to commit cowardly acts of criminal damage, some acceptance has to be realistically tolerated, but will be wherever practicable avoided.

***Avoids addressing security in any detail.***

* 1. A robust security solution has been developed for the proposed development and its location through a structured multi-discipline design and liaison process. The majority of the detail of the security solution is considered sensitive and would potentially compromise the security of the site if released into the public domain.
  2. Therefore, following best practice, the amount of security related information released into the public Planning Application was restricted.
  3. As part of the Planning Application, security information will have been made available to both counter-terrorism and crime reduction teams supporting Westminster City Council.
  4. No objections from the Metropolitan Police Service, CPNI or the Palace of Westminster security team have been received.

***Attacks on Jewish related sites.***

* 1. Attacks against Jewish related sites continue around the world, and as was stated in the Security, Crime and Disorder Assessment (‘The Assessment’), four of those caused fatalities between 2012 and 2019. Whilst Jewish related sites may well increase the likelihood of an attack by some extremists, it needs to be balanced against the tragic terrorist related deaths that have occurred in the same period in the UK. These acts of terrorism have caused a much greater fatality rate.
  2. Whilst publicity is a factor in selecting a potential target for terrorism or extremism activity, the predictability of completing a successful attack that kills or injures may well be higher. The Assessment, talks of the UKHMLC being ‘hidden in plain sight’ at the Imperial War Museum, with a very diluted risk, I do not believe this would be the case. If the draw of a Jewish related site is as high as the Assessment tries to suggest, then the attack will occur regardless of where the UKHMLC is located. Further, by co-locating with another very busy building based site, it may have a counter-productive effect of raising the risk to both UKHMLC and the Imperial War Museum.
  3. If it is the case of the risk remaining regardless of the site, then the risk needs to accepted and the site decision made on other criteria.

***The site is vulnerable to vehicle attacks.***

* 1. Security measures have been designed to reduce the vulnerability of the Gardens to a vehicular style attack, whether this be a Vehicle as A Weapon (VAW) attack aimed at running people down, or a penetrative vehicle attack with intent to then use an Improvised Explosive Device (VBIED).
  2. London has been exposed to VAW style attacks, as has Western Europe, in the last couple of years. This remains a credible and easily committed act. To counter this, a level of protection has been designed to provide an unobtrusive level of vehicle attack mitigation as close to the Garden perimeter as possible.
  3. The level of protection will also have a positive effect on reducing the vulnerability of Garden users at all times, but especially when the Garden becomes heavily populated, such as summer months.
  4. The mitigation has followed the design guidance of CPNI that has been developed for such schemes. Consideration of vehicle dynamics, the mitigation interface with other schemes in the area, and the future upgrade of the Lambeth Bridge junction have also been taken into account.
  5. Tree surveys and trial pits have been undertaken to ensure any potential disruption to trees is avoided as much as is practicable.
  6. The planned measures will provide an unobtrusive and effective mitigation for all users of the Gardens, providing much higher confidence that a vehicle style attack is unlikely inside the Gardens.

***The site must be subject to a detailed survey and report by a Counter-Terrorism Security Coordinator.***

* 1. The Metropolitan Police Service have been engaged from the earliest practicable point in the development process. I have briefed, listened and worked with the Police to develop a security solution that is agreeable to them.
  2. The CTSA has been an integral part of any meetings with the Police, thus providing counter-terrorism advice as appropriate.
  3. I have adopted a multi-dimensional approach in validating the security solution through the involvement of CPNI and CST experts.
  4. The project has received no objections from the Police, CPNI or CST.

***The robustness of security checks on entrants.***

* 1. Entry security checks are part of a layered security scheme that starts from the point of booking. The relatively short processing time for security checks is aligned to the preparation of visitors prior to reaching the ‘search’ point in the process. Pre-arrival information will provide guidance on the size of bag that will be allowed into the UKHMLC and the list of prohibited items.
  2. Limiting what can be brought into the UKHMLC reduces the complexity of the search and what the searchers are trying to find. The system is also scalable through the assistance of technology. The combination of techniques that will be used have been informed through operational experience of providing security at restricted entry sites and other events.
  3. The level of search will be comparable to the entry requirements of other sensitive sites around London, that allow the entrance of the public on a ticketed basis. Thus, the prohibited items are also comparable.
  4. Time is not the defining factor in the security process. If a security officer decides they need additional time for a search they will have that time to complete the search.
  5. The required throughput, detection requirements, required search points, pre-arrival preparation, available technologies and types of visitor have all been factored into the design of the entrance pavilion, where the checks will take place.

***Paragraph 95(a) of the National Planning Policy[February 2019] has not been satisfied.***

* 1. The paragraph reads:

*Planning policies and decisions should promote public safety and take into account*

*wider security and defence requirements by:*

*a) anticipating and addressing possible malicious threats and natural hazards,*

*especially in locations where large numbers of people are expected to*

*congregate. Policies for relevant areas (such as town centre and regeneration*

*frameworks), and the layout and design of developments, should be informed*

*by the most up-to-date information available from the police and other agencies*

*about the nature of potential threats and their implications. This includes*

*appropriate and proportionate steps that can be taken to reduce vulnerability,*

*increase resilience and ensure public safety and security;*

* 1. I believe that the development, design and analysis that has been undertaken on the UKHMLC is compliant with the above extracted paragraph of the National Planning Policy. I have undertaken regular liaison with the Police, CPNI and CST as a specialist in the protection of British Jews to understand and develop the most appropriate security solution for the site.
  2. The security design for the UKHMLC is proportionate to the threat and risk severity posed, and has an element of scalability and flexibility to ensure it is malleable enough to meet the perceived threats scenarios.
  3. Public safety and security have been evenly considered across those visitors to the UKHMLC and those who are visitors to the Gardens. The security design provides for a greater level of resilience and reduced vulnerability to extreme threats such as VAW style attacks than the Gardens would have without the Memorial present.

1. **SIGNED AFFIRMATION**
   1. I confirm that my Proof of Evidence includes all facts which I regard as being relevant to the opinions that I have expressed and that attention has been drawn to any matter which would affect the validity of those opinions.
   2. I confirm that my duty to the inspector, and the minister who will decide the application as an expert witness overrides any duty to those instructing or paying me, that I have understood this duty and complied with it in giving my evidence impartially and objectively, and that I will continue to comply with that duty as required.
   3. I confirm that I am neither instructed, nor paid, under any conditional fee arrangement by the Applicant.
   4. I confirm that I have no conflicts of interest of any kind other than any already disclosed in my Proof of Evidence.
   5. I confirm that my evidence to this Inquiry has been prepared and is given in accordance with the guidance of my Professional Institutions and I confirm that the opinions expressed are my true and professional opinions.

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Director, Head of Security Consulting

WSP UK Limited

3 September 2020