**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**

**SUMMARY 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**

## **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.
1. **SCOPE OF EVIDENCE**
	1. 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.
	2. My evidence deals with security matters arising.
2. **INVOLVEMENT**
	1. 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.
	2. 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.
	3. No objections were received from the Police CTSA or DOCO.
	4. No objections have been received from CPNI.
	5. No objections were received from CST.
3. **MAIN ISSUES**
	1. 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.

CD 5.26

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

* 1. 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.

***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. 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.
	2. 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.

***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.

CD 5.35

***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. No objections from the Metropolitan Police Service, CPNI or the Palace of Westminster security team have been received.

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

* 1. 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 venues.

***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. 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 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.
	2. 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. 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.