**Application for the Installation of a UKK Holocaust Memorial and Learning Centre at The Victoria Tower Gardens [VTG], London SW1**

**Witness Statement of Lord Carlile of Berriew CBE QC**

**Date: April 2020**

1. My name is Alexander Charles Carlile. I was born on the 12 February 1948. My business and correspondence address is SC Strategy Ltd, 6 Gray’s Inn Square, London WC1R 5AZ.
2. I have practised as a barrister since 1971, and became a QC in 1984.I was a Member of the House of Commons from 1983-1997. I have been a member of the House of Lords since 1999, and sit on the Cross-Benches. Materially to the issues in the current matter, I was the statutory Independent Reviewer of Terrorism Legislation [IRTL] from 2001-2011, and continued thereafter till 2014 as the non-statutory independent reviewer of the national security arrangements for Northern Ireland. Since 2012 I have maintained a political and also professional interest in counter-terrorism [CT] issues, advising from time to time Her Majesty’s Government.
3. In my career as a barrister I have appeared in planning appeals, and am familiar with planning law.
4. In addition, I am a founding Director of the strategy and political risks consultancy SC Strategy Ltd: in that role too I have maintained a close interest in CT issues both nationally and internationally.
5. I have a profound personal interest in issues arising from the Holocaust. My parents were Jews born in pre-war Poland. My father (Erwin) was born in 1904 in a village near Przemysl. As a medical student, he was not permitted to examine Gentile bodies in his anatomy training – an example of institutionalised Anti-Semitism. In September 1939, on the second day of the second World War, he was ordered into Hungary with his cavalry regiment, in which he was a reserve medical officer. He never returned to Poland again. He died in 1989, having spent the last 38 years of his life as a general practitioner in Burnley, Lancashire. There was one other survivor, his daughter Renata, who was returned to him in the UK in 1945 by Frederika Susswein (known as ‘Dady’), a Jewish woman who had arranged for Renata to be hidden throughout the War.
6. Dady survived the War in Poland. Her husband, a young neurologist, died by her side in the 1944 Warsaw Uprising. Following an international agreement relating to separated families, she was able to deliver Renata to Erwin in London in 1945. Renata was then nearly 8 years old.
7. Erwin and Dady enjoyed a short romance and were married. I am their child, and Renata is my beloved sister.
8. I have described the above to emphasise my determination that the Holocaust be seen and understood by the widest possible audience, as an important cautionary tale about the dangers of mass, popular movements founded on past political failure, and on the all too easy option of blaming someone else for what has gone wrong in society. It is also a profound cautionary tale about nationalism, inequality, and the failure to recognise diversity.
9. I could add a great deal more about our family experiences as framed by the Holocaust. As a result, I have visited Holocaust memorials in several parts of the world. Some, like Yad Vashem in Israel, are profoundly affecting. Others are less so, occasionally casually insulting. In my view the defining quality of a successful Holocaust memorial is not its location, but rather the intellectual and spatial quality of its content. I submit that such qualitative assessment is a legitimate planning issue that should be considered by the Minister: shape, geometry, use of space sometimes looks well in planning applications, but the overall quality of the proposal may nevertheless be entirely unsuitable in planning terms. In principle this case is no different as a planning issue from a plan to place an architecturally beautiful supermarket or an office building in an entirely unsuitable place.
10. Such memorials have profound lessons to deliver: those lessons are derived much less from immediate visual impact than from the immersive quality of the experience. Nowhere is this felt more dramatically and effectively than in Auschwitz-Birkenau, where my sister’s mother died in 1944.A factor is that one has to make a deliberate decision to travel to get there: it is not a place one happens to pass whilst viewing other major attractions.
11. Such memorials benefit from physical space. A confined site leaves little room for development of a wider nature – for example research projects, location of PhD students, the opportunity to use the site as a backdrop for events such as children’s drama, media presentations and film and TV recording.
12. I support totally the creation of a Holocaust memorial in London, and applaud Ministers and others who have put energy and effort into the concept. However, in my opinion the Victoria Tower Gardens is far from the best available site for the Memorial, for particular reasons including the following:
13. VTG is a small space. It providesno room for expansion and development of the memorial.
14. VTG is essentially a sculptural site, extensively visited for the opportunity to see one of the twelve castings of Rodin’s *The Burghers of Calais.* The VTG casting is unique among the twelve for the pedestal designed and made by the English artist Eric Gill. The artefacts in the VTG are reflective of British rather than world history – including of course *The Burghers of Calais*itself*,* the subject of which is the humane actions of the English monarch on the surrender of Calais to the English Crown in 1346 following the Battle of Crecy.
15. The Holocaust memorial would be therefore be incongruent as a part of the VTG.
16. VTG is used by Parliamentarians and Parliamentary staff as a place for meetings, recreation and relaxation. I have quite often visited VTG myself over the past 37 years. It has benches and a view across the river. There is a children’s playground. If a popular and crowded venue was placed there, it would completely change the character of the Gardens.
17. There is very little parking nearby. Coaches would obstruct roads, which anyway quite often have to be closed either for public safety reasons or for Parliamentary occasions, and adversely affect the existing facilities and ambience.
18. VTG is used very frequently as the backdrop for politically oriented interviews and other broadcasts. The Parliamentary studios of the major broadcasters are at 4 Millbank. The use of VTG is a significant detail of Parliamentary scrutiny and accountability. The conduct of such events with much increased numbers of public milling around would become very difficult.
19. From my extensive experience of observing, analysing and discussing terrorism issues with front line practitioners, I have absolutely no doubt that the proposed site raises a clear– indeed self-evident - terrorism risk. I give this warning with regret, but with total conviction. This would be a threat to the public, and also a potential threat to Parliament.
20. Without going into potentially damaging detail in public,the particular characteristics that give rise to my opinion in sub-paragraph g above include:
* The proximity to Parliament and the frequent presence of members of both Houses in VTG
* The terrorism risks during the building stage, when controls would present major difficulties
* The proximity of significant government offices and entities – emphasising that this is a potential ‘trophy’ site
* The restricted space for people flows on the site
* The restricted space for proportionate search facilities at entrances to VTG
* The total inadequacy of the proposed 20 second security checks at the point of entry
* The difficulty of surveillance in tight crowds
* Vulnerability to attack from the river
* The close passage nearby of large quantities of buses
* The heavy general traffic flow across Lambeth Bridge
* The vulnerability of the Horseferry Road roundabout as a ‘launch pad’ for an attack
* The underground nature of part of the Memorial, raising the dreadful prospect of adults and children being trapped in below ground premises
* The potential effect on the positioning and adequacy of CT barriers and other CT protections situated between Westminster Underground Station and the site
* The lack of detail of proposals for counter-terrorism barriers as protections at and around the site
1. I do not believe that the terrorism risk would be so high at the alternative site mentioned below.
2. I am reluctant to discuss in detail in a statement the *modus operandi* of terrorists. In general, they wish to achieve (i) death; (ii) if possible in an iconic location, as iconic as possible; and (iii) as much disruption as possibleof normal public life. The VTG site would prove very tempting to them.
3. Well documented are the several terrorist events in Westminster in recent years – 22 March 2017, 27 April 2017, 14 August 2018. Once cannot exclude further attacks in the future – my advice is to expect them and plan to interdict them. The worrying rise of right wing extremism increases the targetability of VTG if the Holocaust Memorial is placed there.
4. Other larger, better, suitable London sites are available. Contextually and physically the most obvious is the site of and surrounding the Imperial War Museum [IWM].
5. The IWM is accessible, in a spacious environment, and in a part of South London that would benefit from the extra revenue that would ensue. The IWM has a world reputation as a museum with an understanding of the issues of war and its consequences, and would be the natural partner for the Memorial. The symbolism of making the Memorial part of a campus with its focus on the consequences of war would be beneficial for both the IWM and the Memorial. Synergy of management would be a natural consequence.
6. I have read the many papers available relating to this matter. In particular, I find myself totally in agreement with the submissions of the Thorney Island Society, and with the independent security report dated 18 June 2019 prepared for them by Adrian Tudway, a former ACPO National Co-ordinator for Domestic Extremism.
7. In all the circumstances I regret that my view is that, despite the best of motives behind the proposal, the chosen site is unsuitable. A bigger site, with the opportunities that would offer, would be more suitable.

**Signed **

**Dated 21 April 2020**