**REBUTTAL STATEMENT ADDRESSING THE PROOF OF EVIDENCE OF SECURITY RELATED ELEMENTS BY,**

 **BARONESS DEECH (CD 8.41),**

**LORD CARLILE (CD 8.43) AND,**

**MR CHRISTOPHER PECK (CD 8.47),**

**RELATING TO THE PROPOSED CONSTRUCTION OF THE UNITED KINGDOM HOLOCAUST MEMORIAL AND LEARNING CENTRE, AT VICTORIA TOWER GARDENS, MILLBANK, WESTMINSTER, LONDON, SW1 3JA**

**SECURITY REBUTTAL STATEMENT**

**ON BEHALF OF THE SECRETARY OF STATE FOR HOUSING COMMUNITIES AND LOCAL GOVERNMENT**

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## **1.0** **INTRODUCTION**

* 1. This rebuttal of statements in the proof of evidences applies to those statements made by Baroness Deech, Lord Carlile and Mr Christopher Peck. The rebuttal focuses on those statements that are related to the security of the proposed site for the Memorial and Learning Centre.
	2. The limiting of my rebuttal to these statements in no way implies my agreement with other statements in their proof of evidence.
	3. I have referenced the paragraph that my rebuttal statements refer to from each proof of evidence at the start of each statement, and these should be read in context of the statements made in the proof of evidence by the various objectors.
1. **REBUTTAL OF BARONESS DEECH’S PROOF OF EVIDENCE (CD 8.41)**

**Paragraph 9**

* 1. It is recognised that unfortunately there will be those in society who seek to damage or vandalise the site. Unless the site is placed behind what would be an oppressive perimeter, this risk would still be present at any location.
	2. The location adjacent to the Palace of Westminster is likely to benefit from higher levels of security and a quicker response to any incident. This will provide a higher deterrent effect than if the site was away from such buildings.
	3. The Memorial and Learning Centre have been designed from more robust materials to take account of potential vandalism and criminal damage. This will help prevent serious damage and aid the cleaning that may be required should such an act of vandalism occur. This situation would be the same design issue at any site in London. The move of the Memorial and Learning Centre adjacent to the Imperial War Museum, for example, would not reduce or remove the risk of vandalism focused against the holocaust memorial.
	4. The site in VTG has a defined use, and the Memorial and Learning Centre are controlled whenever open. An intrusion detection capability will operate at all times at the Memorial and Learning Centre.
	5. If the Memorial and Learning Centre were moved adjacent to the Imperial War Museum, the potential 24 hour opening of park areas that would surround the site would hamper the detection of those intent on causing criminal damage, or the opening hours of the parks would need to amended, which would cause a restriction of use of the park areas beyond the normal.
	6. To provide a level of protection to the Memorial and Learning Centre in any location, it would be necessary to have a perimeter that has an element of delay to unauthorised entry. A form of fence has been designed to complement the built and natural elements of the site, and in combination with other security effects seeks to provide a proportional response to applicable threats that the site could face. The fence has been carefully designed to be a ‘softer’ feature of the site, rather than an imposing piece of infrastructure.
	7. It is not planned to have any form of ‘hard’ security checks at the entry points into VTG, however, the use of tried and tested operational procedures, such as Project Servator will be utilised to add layers of protection to the site in a way that is not overly oppressive on all users of VTG.
	8. Project Servator aims to deter, detect and disrupt a range of criminal activity, including terrorism, while providing a reassuring presence for the public. Police officers are experienced and specially trained to spot the tell-tale signs that someone is planning or preparing to commit an act of crime. Servator is focused on positive interaction with the public to aid security and safety.
1. **REBUTTAL OF LORD CARLILE’S PROOF OF EVIDENCE (CD 8.43)**

**Paragraphs 12g – m & 13**

* 1. Unfortunately, in the day and age in which we live, it is inescapable that the Memorial and Learning Centre will carry a risk of terrorist incidents. However, this risk is not so acute to be out of proportion with numerous other sites in London where we see crowded places, with free-flowing access for the public in and around the area. Areas such as Covent Garden, various parks, markets and extremely crowded shopping streets carry the same level of risk from terrorism or extremism, but do not benefit from the levels of security that the Memorial and Learning Centre will have.
	2. It is understood that VTG is used by members of both houses. It is not felt that the presence of the Memorial and Learning Centre would materially alter the threat profile to members of either house that are using VTG. The threat profile to high profile government persons is independent of the location of the Memorial and Learning Centre. It could be further stated, that as the Memorial and Learning Centre will have security, this may act as an additional deterrent to potential incidents in VTG.
	3. It is expected that there are no spatial constraints at the entry points to VTG. It is not planned to have search facilities at the entry points to VTG. Searching and screening will be completed as part of the entry process to the Memorial and Learning Centre.
	4. Security checks upon entry to the Memorial and Learning Centre will be scalable, utilising both manual and technology based approaches, dependent upon the requirement. The approaches have been based on detecting items that will cause significant harm to either people or the built structure. Strict arrival criteria will exist for the site that will simplify the searching and screening process allowing the average process time to not cause a long dwell time. Where required, there is ample provision in the system to complete more in-depth screening without adversely affecting the throughput of visitors.
	5. The difficulty of surveillance of tight or dense crowds is not exacerbated by the location of Memorial and Learning Centre in VTG. Wherever it is sited, it is likely that crowding will be present, and if sited adjacent to the Imperial War Museum, it is likely that overall crowded spaces will increase. This will require further consideration of security. The Memorial and Learning Centre in VTG will address this issue with both technology and operational approaches.
	6. VTG will remain an open access site from the pavement, and therefore the risk of an attack from the river is considered less likely than other approaches, and would form a very exposed route to the site with higher levels of potential detection of abnormal behavior.
	7. The movement of large vehicles adjacent to sites in London is a common risk that is present for all city sites that have good transport links. The design and installation of suitably rated vehicle security barriers is planned in compliance with International Standards. No objection has been raised by the Metropolitan Police Service or Centre for the Protection of National Infrastructure, who have both been made aware of the full design for the site.
	8. Further, TfL have undertaken studies to provide protection across Lambeth Bridge and also at the roundabout with Horseferry Road. The site of the Imperial War Museum would offer considerably more locations on which an attack could be launched from, especially as it does not benefit from the potentially limiting factors of proximity to the river and also having a secure boundary on one side of the site, i.e. The Palace of Westminster.
	9. Measures have been designed to prevent significant threats that would cause the entrapment of people within the below ground areas of the site. A number of evacuation routes are present, and the operational overlay will take account of the ability to invacuate and evacuate people to place them in a safer environment dependent upon the threat.
	10. Regardless of the location of the Memorial and Learning Centre, the provision of ‘last mile’ protection will remain the same for CT purposes. The statement suggests that this risk would be removed by placing the site elsewhere in London, which it does not and in the case of the Imperial War Museum may actually increase the risk due to the variety of potential routes to the site.
	11. Vehicle security barriers are planned, and for obvious reasons, the detail has not been made public.
	12. The risk of terrorism within London remains at a level for concern. Whilst the Palace of Westminster would be classed as a trophy target, this implies that the Memorial and Learning Centre would be a secondary target to existing sites in the area. If the level of threat to the Memorial and Learning Centre is elevated above most sites in the City, less those very high profile trophy sites, it is likely that siting it next to a location such as the Imperial War Museum would elevate the risk profile of the Imperial War Museum beyond its current level, and therefore require extensive security enhancements to the whole combined site. This suggests that a higher overall terrorism risk would be experienced at an alternative site.
	13. It is planned that site activity is monitored during the construction phase and that prudent robust checks will be put in place to ensure a threat is not incorporated into the build of the Memorial and Learning Centre. The need for a higher level of security around construction will be a project risk that will be adequately accounted for by both project management and contractors. Construction adjacent to high security locations occurs frequently in the UK for government, banking, military and high occupancy sites.
	14. The Tudway Report is referenced in Lord Carlile’s Proof of Evidence and comments have been provided in my own Proof of Evidence on this report. However, to re-emphasis a number of key overarching points, it should be recognized that the threat of terrorism should not stop us conducting our normal lives, else it is likely that terrorism and extremism have already won. A view that is shared by Mark Gardner, CEO of the Community Security Trust who daily considers the safety and security of the Jewish community.
	15. The Tudway report paints a sensationalist viewpoint that defines in the text that the risk is so high to cause a ‘perfect storm of vulnerabilities’, but then grades the risk of terrorism to the proposed site usage as ‘Moderate’, not High. I would highlight again, that the Metropolitan Police Service, the Centre for the Protection of National Infrastructure and the Community Security Trust have been fully informed of the security intent and have raised no objections.
	16. The use of phrases such as the construction site providing ‘an instant armoury’, over-simplifies a risk-based consideration that ignores the practical and effective mitigation measures that will be put in place to lower the risk of construction equipment misuse.
	17. The unfortunate vehicle as a weapon attacks that have occurred in London have highlighted this potential threat vector, and this has been taken into account for the Memorial and Learning Centre with a proportional response planned.
1. **REBUTTAL OF MR CHRISTOPHER PECK’S PROOF OF EVIDENCE (CD 8.47)**

**Paragraphs 10 & 11**

* 1. Security barriers to protect people who have entered VTG are designed and planned to be installed. These will be installed in compliance with the international standards that define the use of vehicle security barriers for countering terrorism and extreme attacks. This provides a high level of protection at the earliest point of entry into VTG.
	2. TfL are considering the protection of pedestrians crossing all major bridges in London, including the Lambeth Bridge and the roundabout junction at Millbank and Horseferry Road. This work considers the protection of pedestrians at the junction.
	3. Visitors to VTG, who will generally come from the Palace of Westminster direction, will be encouraged to enter VTG by the most suitable entrance, therefore limiting their time on the pavement that runs along Millbank. This places pedestrians in a safer area with a layer of protection from hostile vehicle attacks, and will reduce the footfall along the pavement area.
	4. Vehicle activity along Millbank, including coaches dropping or picking up visitors will severely restrict the ability of an attacker in a vehicle either maneuvering or gaining higher speeds to carry out a vehicle as a weapon style of attack on the pavements adjacent to VTG.
	5. Given the opportunity of visitors to be protected inside VTG at the earliest opportunity, the level of protection offered represents a good mitigation against vehicle attacks.
	6. The development of a hostile vehicle mitigation scheme has been presented to both the Metropolitan Police Service and CPNI representatives and has received no objections.
1. **CONCLUSION**
	1. The proofs of evidence provided imply that any other location other than VTG would mean an overall lower risk level for the Memorial and Learning Centre, however as stated by Baroness Deech, the *vandalism of Jewish related sites is frequent*, but this seems to not be limited to trophy sites as attackers pre-plan to undertake these attacks. Therefore, the risk profile of the Memorial and Learning Centre will remain fairly constant regardless of the site chosen.
	2. The proofs of evidence also imply that by moving the site to be adjacent to the Imperial War Museum means less security would be required as the threat changes. This is not the case, the threat will remain, and therefore proportionate and appropriate security measures will still be required. The Park area around the Imperial War Museum does not benefit from some of the features that would help protect the Memorial in VTG, and therefore it is likely that a further enhanced security provision would need to be provided.

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