

**UK HOLOCAUST MEMORIAL AND LEARNING CENTRE (UKHMLC)  
VICTORIA TOWER GARDENS  
SECURITY NOTE**

## **Introduction**

1. Throughout the development of proposals for the UK Holocaust Memorial and Learning Centre (UKHMLC), the Government has recognised the great importance of security considerations. The Government seeks to ensure that the UKHMLC is designed and planned such that it can be operated safely and securely.
2. During the passage of the Holocaust Memorial Act 2026 the Government, as promoter of the Bill, gave an undertaking to the House of Lords Select Committee on the Bill in relation to security matters. The undertaking included a commitment to provide updated evidence in relation to security considerations, after consulting with a number of named parties. This note, which will be submitted to support redetermination of the planning application for the UKHMLC, explains how security considerations for the UKHMLC have been addressed and how representations made by consultees have been considered.
3. The note sets out:
  - which elements of the security design set out in the planning application remain current
  - which security arrangements will be developed further as the programme proceeds
  - how relevant authorities and stakeholders have been, and will continue to be, engaged.
4. For ease of reference:
  - Paras 6–15 explain the planning, legislative, and consultation context for security
  - Paras 16–27 describe the overall security approach and principles applied
  - Paras 27–32 explain how security will be operated and managed in practice, including staffing, training, and communications
  - Paras 33–36 describe ongoing liaison, assurance, and governance arrangements
5. In line with National Protective Security Authority (NPSA) guidance, detailed or sensitive technical security information is intentionally excluded from this document.

## **Why this note has been prepared**

6. In 2018, the Secretary of State for Housing, Communities and Local Government (MHLG) on behalf of the Government, as the promoter of the scheme, submitted a planning application for the UKHMLC. That application remains live. The application drew on extensive advice from security experts, included detailed security arrangements and provisions for the UKHMLC demonstrating a proportionate and appropriate level of security for the safe and successful operation of the UKHMLC within the wider site in Victoria Tower Gardens (Site) more generally. In line with NPSA Information Management and Sensitive Information in Planning Applications (SIPA) guidance, not all of these details are in the public domain.

7. Security matters were considered during the planning inquiry which took place in October-November 2020, including through written evidence provided by Matthew Brittle, the security expert advising Government on the UKHMLC. Additional evidence was made available to Westminster City Council (WCC) but not published because of the risk that publishing such information could compromise the security of the UKHMLC site. The planning inspector noted that neither WCC nor their advisers objected to security aspects of the proposal.
8. In July 2021, the Government secured planning permission for the UKHMLC and subsequently agreed operational security plans with WCC. This planning permission was quashed by the High Court in 2022. The Government introduced a Bill into Parliament in 2023 to remove the statutory obstacle to construction of the UKHMLC in the Site, ahead of redetermination of the planning application.
9. As the Holocaust Memorial Bill (now Act, having received Royal Assent in 2026) was progressing, an undertaking was given to the House of Lords Select Committee that:
 

*Before submitting to the Secretary of State any representations on security considerations, the Promoter will consult with the Corporate Officer of the House of Commons and the Corporate Officer of the House of Lords, the Community Security Trust, the Metropolitan Police, the National Protective Security Authority and Westminster City Council, and will have regard to any comments they may make to the Promoter on security considerations. The Promoter will forward those comments to the Secretary of State when making any representations on security considerations.*
10. This consultation has taken place, and this note sets out the Government's high-level approach to security in light of those representations and further discussions with stakeholders. Copies of those representations are available alongside this note, except where they remain sensitive.

In particular, consultees' comments have been taken into account as follows:

- The Clerks of the Houses of Commons and Lords requested further briefings on aspects of the security proposals. Further briefings have now taken place and more have been arranged. The Clerks also sought assurance that the Promoter is following relevant National Protective Security Authority (NPSA) guidance; NPSA guidance has informed the proposals in this note and will continue to inform the development and operation of these proposals as the programme proceeds.
- The Metropolitan Police Service confirmed that, in their view, the security proposals are proportionate and appropriate. They also indicated that further recommendations would be made through ongoing discussions with the project team. A security stakeholder group involving Met Police representatives, NPSA and Parliamentary Representatives has been set up and will continue through to operations.
- Westminster City Council requested that details of security measures, including hostile vehicle mitigation, should be included in the planning application documents; this has been done. WCC also indicated that a section 106 agreement would be used to secure obligations relating to the

implementation of construction and security management plans. The Government agrees with this approach (see para 14 below).

- The NPSA requested that their response should remain confidential. The proposals set out in the planning application and summarised in this note take full account of NPSA guidance.
- The Community Security Trust reiterated its strong view (as set out in its letter to Peers of June 2025) that security arguments should not be used to seek to prevent construction of the UKHMLC in Westminster.

11. After careful consideration of all responses to consultation and taking account of all relevant advice and guidance on current security threats, the Government, as promoter of the scheme, has concluded that no changes are needed to the design of the UKHMLC as set out in the current planning application. Consultation responses have emphasised the importance of continuing to consider security matters during the construction and operational stages, and continuing to engage closely with stakeholders.
12. The security information and strategy have been reviewed to confirm continued compliance, and work continues with stakeholders on operational security matters which, since the application was submitted, may need to be updated to reflect developments in technology.

## **Planning Documentation and Process**

### What has already been assessed and agreed

13. As part of the planning application process, the Government submitted a planning application in 2018, which was updated in April 2019. The Security System Specification, which forms part of the design of the UKHMLC, remains appropriate for the proposed development and use and has not been amended as part of the re-determination documentation.
14. In the event that planning consent is granted following redetermination of the application, the Government would expect that certain pre-commencement conditions relating to security matters will be attached to that consent. When consent was initially granted in 2021 such conditions included the provision of operational security documentation, such as a construction site security plan and operational security management plans, which were to be agreed with WCC.
15. The sections that follow set out, at a high level, both the measures contained within the security design and the approach to operational planning.

## **Scope of Security Measures**

### What types of security measures are included?

16. At the core of UKHMLC operations is the management of visitors: robust searching and screening procedures will be implemented using technology that is scalable and flexible. The UKHMLC operational baseline for this work was defined during the design process. The process, design layout, and technology to be utilised were reviewed by the NPSA, Metropolitan Police Service (MPS), and Community Security Trust (CST) to obtain expert views on the appropriate combination of measures.

17. Applying principles from Crime Prevention Through Environmental Design (CPTED), including access control, surveillance, and territorial reinforcement, the design proposal will improve, for example, the configuration of the playground in VTG and reinforce its intended use. This will assist those supervising playground users in distinguishing between legitimate use and suspicious activity.
18. A high level of security liaison will be maintained with the Police, the Palace of Westminster, other iconic venues in the vicinity, and relevant stakeholders to ensure that foresight, planning, and capability are consistently maintained.
19. The security approach for the UKHMLC will take account of incoming legislation, such as Martyn's Law, and lessons learned from a range of incidents that have occurred in the UK.

## **Security Concept of Operations**

### How security is intended to function overall

20. Security for the UKHMLC will be considered as a single, integrated 'security ecosystem'. A proactive approach will be driven through the personnel employed with a dynamic concept of security operations, allowing adjustments to be made for higher-risk times, events, and local, national, and international influencing factors.
21. The security and management team will undertake regular periodic reviews of effectiveness, alongside immediate management reviews following any incident elsewhere or event at the UKHMLC site.
22. Security at the UKHMLC will aim to maintain the initiative over potential attackers or disruptors. This will be achieved through day-to-day operational practice, taking account of visitor numbers, patterns of use, and the prevailing threat and vulnerability context. The security posture will be dynamic to help spot and disrupt hostile reconnaissance.
23. The structure will include built-in protection of critical building and life-safety systems, and the use of suitable materials throughout the facility to reduce potential harm from misuse or adverse loading. Appropriate surveillance (CCTV), detection, and access-control technologies will be deployed.
24. Around the perimeter, the design incorporates appropriate pedestrian and vehicle security barriers to protect the Site.
25. The UKHMLC will have a robust technology overlay, alongside protective materials, with the security concept of operations binding these elements together into an effective and coherent capability.
26. Technologies, policies, and procedures will be reviewed periodically to ensure that appropriate security is maintained and that installed systems operate as intended, supported by robust management of maintenance contracts.

## **Threat and Risk Context**

### How risks have been considered at a high level

27. The threat and risk landscape has been reviewed to take account of current and potential future influences. These matters have been discussed with the Police and

the NPSA to ensure that security arrangements for the UKHMLC remain relevant and effective.

28. A key requirement for staff will be See, Check and Notify (SCaN) training, alongside the rigorous maintenance of a comprehensive Threat, Vulnerability, and Risk Assessment (TVRA) covering the Site, its use, staff, and visitors.

## **Security Staffing and Management**

### Who delivers security and how it is overseen

29. The operational approach is to maintain a robust command and control structure, supported by appropriate technology and staffing. This will require professionally trained and equipped personnel who are capable of responding effectively to security and other incidents.
30. Security personnel, and the training provided to all staff, will be professional, will seek continual improvement, and will be integrated into routine duties. Only personnel with the requisite attitude, experience, and interest will be engaged.
31. We will develop and implement an appropriate personnel security checking/vetting process for individuals involved with the future detailed design and work to construct and operate the UKHMLC

## **Training and Staff Awareness**

### How capability and readiness are maintained

32. A pre-operational training programme will be developed and undertaken by contractors' staff. The NPSA, MPS and CST have indicated their willingness to provide suitable training modules and advice. Ongoing training to retain skills, alongside development and improvement training, will be provided.
33. In addition, all staff will receive appropriate training to identify, monitor, and report Unmanned Aerial Systems (UAS), and to coordinate with other agencies and policing organisations in support of the counter-UAS strategy for the local area.

## **Security-Minded Communications**

### How information and visitor messaging supports security

34. The security approach includes adherence to NPSA principles and guidance, providing a suitably layered protective security solution. It also includes the adoption of NPSA security-minded information-management principles to control and protect sensitive information throughout all stages of construction.
35. Communications will be used as a conditioning tool for security. This has two principal effects:
- a. reinforcing the deterrent effect, such that any potential attack is unlikely to achieve its full aim; and
  - b. reducing the complexity of what must be assessed by security personnel. This approach was embedded during design development and includes information such as:
    - o a comprehensive list of prohibited items

- clear direction on the size and type of bags that may be brought to the UKHMLC
- acceptable behaviours.

36. A communications programme will be developed that takes account of guidance available from the NPSA.

## **Security Community and Liaison**

### How coordination with authorities is maintained

37. Officials for the UKHMLC remain committed to playing an active role in the wider security community, including engagement with the Police, the NPSA, the Palace of Westminster, Westminster Abbey, and other nearby locations.

38. This will involve continued close liaison and coordination with the MPS's Protective Security and Operations (PSO) Command, the Government Security Zone (GSZ) team, the Parliamentary Security Department (PSD), and other relevant organisations.

## **References**

### References used in the preparation of these notes were as follows:

- RIBA Stage 4 Design Information – The National Holocaust Memorial and Learning Centre, Adjaye Associates and WSP.
- Promoter's Response to the Select Committee's Special Report, Session 2024–25, MHCLG.
- Proof of Evidence of M. A. Brittle CEng MSc CSyP RSES, on behalf of the Secretary of State for Housing, Communities and Local Government, Call-In Inquiry, evidence dated 3 September 2020.
- Antisemitic Incidents Report 2024, Community Security Trust (CST).
- CST response to UKHM security concerns, Mark Gardner MBE, Chief Executive, CST.
- Metropolitan Police Service response to Sir Gerald Ronson CBE, Matt Jukes QPM.
- Threat and protection discussions, June 2025 – May 2026, National Protective Security Authority (NPSA) and Metropolitan Police Service (MPS) Counter-Terrorism advisers.

Jon Savell  
Deputy Assistant Commissioner  
Specialist Operations  
New Scotland Yard  
Victoria Embankment  
London SW1A 2JL

25 February 2026

Katie Farrington  
Director General – Buildings, Fire & Resilience Group  
2 Marsham Street  
London, SW1P 4DF

Dear Ms Farrington,

**Holocaust Memorial and Learning Centre (HMLC) Security Considerations**

Thank you for your letter dated 28 January 2026 and attached security note. I reply on behalf of the Commissioner in my role as CT Policing's Senior National Coordinator for Protect and Prepare.

I note the undertaking by Government to consult with the MPS, and concerns raised by the House of Lords Select Committee in relation to Security of the proposed site

My CT Policing, Counter Terrorism Security Advisors (CTSAs) are trained and tasked by The National Counter Terrorism Office (NaCTSO) and assess risk from terror attack and advise accordingly on the security of crowded places. In partnership with the NPSA (Previously CPNI) and the named security consultant, Matt Brittle, the Protective Security team have advised MHCLG on the proposed Victoria Tower Gardens location, in relation to various security considerations since 2018.

In relation to the security note, and request for comments, I have confirmed via CTSAs that the security provision detailed in the note for the HMLC is proportionate, appropriate and an accurate reflection of security and stakeholder engagement. It is also important to note that over the passage of time since this work began, the options and capabilities available for consideration in the Protective Security space have evolved. There are several additional security recommendations for consideration that my team will discuss with the project design team.

Please do not hesitate to contact me if you require any further information regarding security issues related to the proposed site.

Yours Sincerely,



**Jon Savell**  
**Deputy Assistant Commissioner Specialist Operations**



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**Katie Farrington**  
Director General  
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2 Marsham Street  
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Name: David Dorward  
Area Planning Officer (South)  
Regeneration, Economy & Planning

By email only to :

Email :

Date: 3 March 2026

Dear Katie,

### **HOLOCAUST MEMORIAL: SECURITY**

Thank you for your letter of 28 January 2026 inviting comments regarding security matters in relation to the proposed Holocaust Memorial and Learning Centre within Victoria Tower Gardens.

The City Council welcomes early engagement with the applicant to ensure the application documentation is up-to-date and takes into account changes to the City Plan policies and other material considerations since the planning application was originally determined. This should include subsequent changes to traffic and the public highway in relation to Lambeth Bridge and also those being actively considered under the Parliament Square Streetscape Project. Consideration should also be given to how the Restoration and Renewal project at the Palace of Westminster may affect Victoria Town Gardens and the surrounding area.

The note that accompanied your letter setting out your proposed approach to security does not provide details of many of those elements that are of most significance to us as a local authority. Specifically details of any physical measures or vehicle security barriers; the details of many measures proposed within the public realm and considerations in relation to the safe arrival of visitors to the site, particularly groups travelling by coach. These should be included within the planning application (updated as necessary).

As per the quashed planning permission, any s106 agreement would again seek to secure obligations requiring the implementation of Construction and Security Management Plans.

As previously, the information can be treated as sensitive where required.

Please contact the case officer David Dorward by email:  
to arrange a meeting to discuss next steps at your convenience.

Yours sincerely,

**David Dorward**  
Area Planning Officer (South)





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📘 Community Security Trust 🐦 @CST\_UK

Community Security Trust is a registered charity in  
England and Wales (1042391) and Scotland (SC043612)

June 2025

## **UK HOLOCAUST MEMORIAL: SECURITY MATTERS**

### **1. CST**

CST is Community Security Trust, a registered charity that provides security guarding, equipment and assistance to British Jews. CST works very closely with police forces, government and civil servants. CST is widely acknowledged as Britain's leading non-state authority on antisemitism, anti-Jewish terrorism and Jewish communal security issues.

### **2. The Principle of enabling Jewish life**

CST works with others to help enable British Jews to lead the lives of their choice. It is the same as the police do for all of society: working with partners in government and elsewhere to manage risk and mitigate threat, so that life continues as normal, enabling and protecting basic human rights.

No UK Jewish event or building is withdrawn because of generalised security concerns. Security measures are put in place but cancellation would only occur upon police or security service advice of imminent danger.

### **3. Security as an excuse to prevent the proposed UK Holocaust Memorial**

Anyone is free to oppose the building of UKHM in Westminster, but to keep using security as an excuse for prevention is unjustified and deeply unacceptable.

Preventing UKHM in Westminster on security grounds is perverse, as it is a unique deviation from the accepted practise of public activities being enabled by implementation of the necessary security mitigants. Cancellation only occurs if hard intelligence warns of imminent danger.

Those using the security excuse go further than merely seeking the cancellation of a single public event. They claim that the security risk to UKHM in Westminster is so high, both now and for the foreseeable future, that it cannot even be built. Such a claim requires a high level of proof. If this proof exists it should immediately be given to police.

It is offensive when unsubstantiated claims are made that amount to antisemitic scare stories. This case goes further as it uses scare tactics as an excuse not to build a Holocaust memorial and learning centre in Westminster. That is deeply offensive and neither CST, nor police, should have to waste more valuable time arguing the case.

#### **4. The credibility of the security excuse: antisemitic terrorism**

CST will never deny the reality of antisemitic terrorism. It is the reason CST exists. CST and British Jews have spent well over £100 million in recent decades on counter-terrorist security measures.

Most people have no realisation of how extensive the threat of antisemitic terrorism actually is in Britain, nor how many plots are disrupted and stopped by police and security services, sometimes assisted by CST.

Terrorist plots are typically Nazi, Jihadist or Iranian in origin. They come from radicalised individuals, local radicalised grouplets, international terrorist organisations and hostile states, notably Iran. They occur regardless of the overall level of general antisemitism but escalate during and after important UK and global events. Currently, the threat of such terrorism is unusually high, given everything post 7 October 2023 in Israel, Gaza, Lebanon, Yemen and Iran.

The antisemitic terrorist threat is real and it is high, but that does not justify preventing the creation of UKHM in Westminster any more than it justifies the closure of public Jewish life in Britain.

The reaction to the threat is to confront its reality, with neither exaggeration nor denial. Next, the requisite mitigants need to be put in place. This is what British Jews do; and it is what police, security services and government do.

## **5. The credibility of the security excuse: Westminster**

Opponents of UKHM in Westminster have claimed that the security risk prevents it being built in Westminster but not elsewhere. This is nonsense.

Westminster is one of the most heavily protected areas in Britain, with overt and covert security layers, armed police and nearby reinforcements. If Westminster cannot host a UKHM on security grounds, then nowhere in Britain can.

The reason for Westminster being so extensively secured is very obvious. The threat against the Palace of Westminster (and nearby buildings, memorials, bridges etc) is high. This is shown by the number of terror plots that have been prevented and is tragically demonstrated by those terror attacks that have occurred. In this context, it is an offensive fallacy to claim that a UKHM in Westminster brings so much more added risk that it cannot even be built.

## **6. Jews cannot or will not be protected by Britain**

The security excuse against UKHM effectively amounts to the British state surrendering to anti-Jewish terrorism.

It tells British Jews that whilst others can enjoy their freedoms, Jews cannot.

It tells British Jews that the UK Parliament does not believe that the government, police and security services are capable of protecting a Jewish manifestation in the physical and political heart of UK public life.

It tells British Jews that the UK Parliament is not willing to make the security investment that is required to have a Holocaust memorial and learning centre in the physical and symbolic heart of British democracy.

## **7. Parliament surrendering to extremism and threats**

If UKHM cannot exist in Westminster on security grounds, then what will be the next thing to be cancelled in this way? Or is it only the Holocaust and Jews that are put up for cancellation in Westminster? Neither option is acceptable.

UKHM is a learning centre. The learning is that running from extremists only fuels more extremism. The learning is that freedom always needs securing.

Mark Gardner MBE, Chief Executive, CST.



HOUSE OF COMMONS



HOUSE OF LORDS

**Dame Sarah Healey DCB CVO**  
**Permanent Secretary**  
**Ministry of Housing, Communities and Local Government**

2 March 2026

Dear Dame Sarah,

Thank you for your letter of 28 January 2026 about Holocaust Memorial security. We welcome the opportunity to provide comments.

As you would expect, we are commenting only on security matters and not on wider considerations about the Holocaust Memorial and Learning Centre

Our teams have been in regular and constructive dialogue on the overall plans for the UK Holocaust Memorial and Learning Centre with your team led by Paul Downie. This has included helpful initial discussions last year between security teams. In order for us to take a fuller and more detailed view on the proposed security arrangements, follow-up to the initial discussions with Matthew Brittle last summer and Catherine Hallett's email to Paul Downie and Andy Bramwell of 4 August 2025 in the following respects would be helpful:

- A more detailed briefing on the specific security-related design elements and documentation that will be included in your planning application;
- Further detail on the considerations the design has to the wider security environment (and how it will be operated);
- The Construction Security Plan which was referred to in last summer's initial discussions;
- Early engagement as you develop your concept of security operations so we can start to discuss how we will work together, alongside other relevant stakeholders and authorities.

We look forward to working with you on these and stand ready to do so at your team's earliest convenience. In the meantime, an early assurance that you will be following all the relevant National Protective Security Authority (NPSA) guidelines would be helpful to us and, we are sure, the NPSA, Metropolitan Police and Westminster City Council.

Parliament's recently appointed interim Managing Director of Parliamentary Security, Paul Martin, and his team are available to take forward the actions proposed above.

Yours sincerely



**Tom Goldsmith**  
*Clerk of the House of Commons*



**Simon Burton**  
*Clerk of the Parliaments*