

# INQUESTS ARISING FROM THE DEATHS IN THE LONDON BRIDGE AND BOROUGH MARKET TERROR ATTACK ON 3 JUNE 2017

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## SUBMISSIONS ON BEHALF OF THE CITY OF LONDON CORPORATION AS TO A PFD REPORT

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### INTRODUCTION

1. This is the City of London Corporation's ('The Corporation') response to the submissions made on behalf of the bereaved families regarding the question of the need for a PFD report. They relate to the position of the Corporation and shall therefore be focussed on issues arising which relate to the Corporation only.
  
2. As was put before the Coroner in evidence by Richard Woolford, Strategic Director of Security, and Ian Hughes, Assistant Director (Highways), since 2017, the Corporation has undertaken a wide-ranging review of its approach to counter terrorism, covering the three themes of culture, governance and stakeholder engagement:
  - a. Security Culture: The Corporation has sought to establish a public realm security culture addressing issues of ownership and accountability, coordination and engagement with third parties and resilience and reassurance in the context of the wider terrorist threat;
  - b. Governance: The Corporation has refreshed its governance for the delivery of security measures on the public realm. This has included the creation of a Public Realm Security Advisory Board (SAB), involving the Corporation, City of London Police (CoLP) and Transport for London (TfL) which has driven forward:
    - A risk assessment process considering questions of threat and vulnerability;

- The prioritisation of locations in conjunction with embedded City Police Counter Terrorism Security Advisors (CTSAs);
- Retrofitting priority crowded space locations;
- Accelerating the delivery of existing security schemes;
- Integrating security assessments into future public realm schemes;
- The consideration of proportionality, buildability and affordability in designing public realm security schemes;
- Establishing and maintaining 'fast time' response capabilities.

Annexed to these submissions are the SAB's terms of reference and most recent agenda.

In addition, a Public Realm Physical Infrastructure workstream has been embedded within the CoLP Secure City programme, and political approval has been received for a proportionate risk-based approach to public realm security measures. This has led to the establishment of funding for a stand-alone Public Realm Security Programme and the approval of individual protective measures on a location by location basis.

- c. Stakeholder Engagement: In the last two years the Corporation has significantly increased its level of stakeholder engagement on public realm counter terrorism matters, for example with CoLP and TfL, as well as with stakeholders at specific locations. CoLP CTSAs are now embedded in Corporation decision-making, with joint ownership of threat and vulnerability assessments and joint prioritisation of key locations using various weighted criteria (and now the new National Counter Terrorism Security Office (NaCTSO) guidance). As a result, both parties have aligned their approaches, with regular, open communication and involvement in decision-making. There is a clear understanding of the potential risks and requirements for short term mitigations vs long-term permanent measures, as well as an improved

understanding and delivery of proportionate measures to protect major events.

In particular, our work with TfL includes:

- Combined workshops covering threat and vulnerability for the Thames bridges;
  - The start of a feasibility and concept design process for permanent bridge measures;
  - Assessing vulnerabilities on the TfL Road Network (TLRN) highlighted by CoLP;
  - TfL inclusion in the Corporation Public Realm SAB to exchange information.
3. Taken together, these actions have enabled the Corporation to deliver a step change in the way it approaches the issue of how to address counter terrorism on the public realm, specifically in terms of the vulnerability of its crowded spaces to vehicle as a weapon-style attack. In total, fourteen public realm locations in the Square Mile have permanent security mitigation measures either in design, construction or completion, with a further three protected by temporary interim measures. This programme of works will continue into the medium term as the City looks to consider and prioritise proportionate measures in conjunction with CoLP and TfL based on the new NaCTSO assessment criteria.

## **THE INDIVIDUAL RECOMMENDATIONS**

OSCT should consider the effectiveness of the definition of crowded spaces to avoid rigidity

4. Following the 2017 terrorist attacks, CoLP and the Corporation established and implemented a bespoke assessment system using a wider range of key criteria, allowing for more effective (and less prescriptive) localised prioritisation of crowded places covering a wider range of locations.

5. NaCTSO have recently set out new guidelines on crowded space assessments using much the same approach which the CoLP CTAs are now using to revise the assessment and prioritisation of many more locations in the Square Mile.

OSCT should ensure the definition allows crowded spaces and iconic locations that do not meet the strict crowd density criteria be treated as crowded places

6. As above, since 2017 CoLP and the Corporation have adopted a wider definition of crowded places at a local level, and the new NaCTSO guidelines support this approach at the national level. CoLC do not therefore, understand there to be a need for such a recommendation.

An (annual) independent third party review of the list of existing crowded places should take place

7. A review of guidelines at the national level would be for the Sec of State / OSCT / DfT to consider. However, in terms of sense checking assessments at the local level, CoLP submit their prioritisation list to NaCTSO for review in a national context, and the Corporation have (on occasion) employed external specialist security consultants to challenge our approach to design and delivery of security measures for specific locations.
8. Nevertheless, implementing an independent assessment of local priorities across the UK would be challenging given it would require both an overview of national processes and threat as well as how both are considered at the local level throughout the country. CoLC do not therefore, understand there to be a need for such a recommendation.

Sec of State / OSCT / DfT should issue guidance to all highway authorities on the scope of their responsibility for assessing locations

9. Current guidance documents, such as the NaCTSO Crowded Places Guidance 2017, fail to specifically identify highway authorities as a distinct sector, so explicit guidance as to the expected roles and responsibilities of highway authorities would be welcomed.
10. Such guidance should also consider the respective issues whereby highway and local authority functions are not delivered by the same body, and where two-tier authorities exist.

Sec of State / Dept for Transport should consider whether highway authorities should be given a statutory duty to consider counter terrorism measures

11. Since 2017 the Corporation and the CoLP CTAs have worked together to assess numerous locations throughout the Square Mile considered to be potentially vulnerable and at risk. This has been done by taking a proportionate approach, learning lessons from 2017 rather than in response to the creation of a statutory duty.
12. Creating such a duty would imply the need to systematically assess every street across the UK to consider and mitigate the risk and liability of terrorist attack from a specific type of vehicle-based threat.
13. Such a nationwide commitment would seem disproportionate in that it fails to account for the difference in potential threat across the UK, as well as being beyond the capabilities and resources of most if not all highway authorities to deliver. Without additional central government funding, such a liability would be limited in its effectiveness and may well require the reallocation of funding from other local public services.

14. Placing such a statutory duty on highway authorities also risks creating a prescriptive 'one size fits all' approach that might also imply a disproportionate focus on one type of current attack methodology.
15. Protective security for the public realm requires a holistic approach to dealing with multiple attack methodologies, and such a prescriptive approach to crowded spaces may be at the expense of mitigating the risk from other current and emerging threats where the highway authority has a lesser role to play.

Sec of State should consider whether CTAs ought to have the power to compel duty holders to implement counter terrorism measures

16. It's unclear how using such a power would take into account a Highway Authority's other statutory duties and responsibilities (e.g. road safety and accessibility), its wider service priorities and any technical design, consent and funding constraints.

CoLP, Corporation and TfL should review procedures so that swift action can be taken where necessary

17. TfL have now become a key part of the Corporation and CoLP's security programme and governance. Priority locations on the TfL Road Network in the Square Mile have been reviewed, with the Corporation taking the lead on installing measures in one particular location on TfL's behalf.
18. TfL, the Corporation and the CoLP will continue to closely cooperate and align their respective working practices, including the process for considering threats, assessing vulnerable locations and the ability to respond to urgent issues in 'fast time'.

19. Furthermore, ensuring there is sufficient capacity, capability and availability of HVM resources to respond in relative fast time to emergency security threats and vulnerabilities, including appropriate processes across all parties to trigger their consideration and proportionate deployment is part of the terms of reference of the SAB

CTSAs need advice and training on rapid response options

20. This has been provided through joint working between the Corporation, CoLP CTSAs, CPNI and suppliers. This will continue for the foreseeable future.

OSCT / NaCTSO should consider guidance on rapid response options

21. CPNI have issued briefing notes on the increasing palate of temporary / fast time equipment available and the operational requirements appropriate for their deployment.
22. Further work with CPNI is expected, including the development, testing and deployment of new equipment in conjunction with suppliers and highway authorities.

Permanent solutions should be implemented on the Thames bridges as soon as practicable

23. For the two Thames bridges where the Corporation are the Highway Authority, temporary and then permanent measures to protect the approach to the Millennium Bridge were implemented in the months immediately following the London Bridge attack, and concept designs for Southwark Bridge are currently undergoing structural assessment.

24. For the remaining three bridges where TfL are the Highway Authority but the Corporation have an interest through Bridge House Estate (London, Tower and Blackfriars), both the City Corporation and CoLP have already taken part in TfL's Threat and Vulnerability Risk Assessments that will inform future priorities and options.
25. TfL are expecting to lead on permanent measures for London, Tower and Blackfriars Bridges, with the direction, pace and funding to be considered by the London CONTEST Board later this year.
26. The challenges of deploying effective permanent measures on bridge structures are being addressed by CPNI through a call to suppliers to develop and test new designs, which will help inform the concept design work about to begin between TfL and the Corporation.
27. Meanwhile, effective liaison continues with the Metropolitan Police over the maintenance of the current protective measures, with the City intending to release the National Barrier Asset on Southwark Bridge as soon as permanent replacement measures are in place.

In addition to TfL's review of parapet heights (following Westminster Bridge), netting on bridges should be considered

28. Netting for bridges has been discussed previously in the context of suicide prevention. It has considerable technical, design and effectiveness issues, including: the risk created in the removal of someone from netting and the attachment of the netting to the bridge structure.

Sec of State to consider legislation to require owners of structures to cooperate in design / installation of security measures and not unreasonably withhold consent

29. This might be difficult to define given the potential complexity regarding who should be responsible for such measures and the structural risks such measures might impose.
30. Useful engagement on this proposal could be achieved through discussion with such bodies as the UK Bridges Board, Highways England, the Association of Directors of Environment, Economy, Planning and Transport (ADEPT) and the London Bridges Engineering Group (LoBEG).

Police and Highway Authorities to review and enhance their capability to install HVM with reasonable speed

31. Temporary measures are now explored as a matter of course as part of the assessment of risk for long term projects, and the Corporation have deployed measures in fast time in response to CoLP raising urgent vulnerabilities.
32. This has resulted in a combination of hired and purchased materials being deployed, as well as use of the National Barrier Asset, and is now a standing item for discussion and review at the Corporation's Public Realm Security Advisory Board.
33. In addition, the Corporation has continued to retain its standing Anti-Terrorism Traffic Regulation Order available for use by CoLP, either in extremis or for planned events, for both City Corporation and TfL streets in the Square Mile.

Briony Ballard  
Serjeants' Inn Chambers  
London

5 September 2018

## ***Public Realm Security Advisory Board***

### ***Terms of Reference***

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#### **Board Objectives:**

The City of London Corporation can play a key role in helping to protect residents, workers and visitors to the Square Mile from a range of critical security threats in and around the public realm.

Part of the City's Security Strategy is to establish a corporate-wide culture, framework and structure to provide oversight, ownership and coordination in response to those security threats across the Square Mile.

A Senior Security Board (SSB) has been established to inform and drive a Security Plan to deliver Corporation wide ownership, accountability, change, improvement, value for money and assurance in delivery of security matters.

The SSB have approved the formation of a Public Realm Security Advisory Board (SAB) to work together with the City Police, security agencies and key City stakeholders to develop, innovate and improve the security provision within the Square Mile through the use of the City's powers as highway and traffic authority.

In considering how to exercise those powers, the Public Realm SAB must also consider such measures in the context of the City's wider responsibilities as highway and traffic authority, its Member-approved policies regarding security on the public realm, and the appropriate governance provided by national legislation, City Standing Orders and Member oversight arrangements.

#### **Meeting Frequency:**

Every 6 Weeks

#### **Aims:**

The Public Realm SAB will provide a corporate focus, ownership, visibility, oversight, direction, guidance, coordination, development and rigor in dealing with the current security risks and threats to the public realm, with a particular focus on Hostile Vehicle Mitigation (HVM):

This group is tasked with:

- establishing and maintaining a process to deliver proportionate, buildable and affordable security changes to the public realm, to the priorities & pace recommended by the Senior Security Board;
- where necessary, acting as the Client to deliver that change to the public realm, including measures associated with specific buildings, bridges and spaces;
- agreeing the strategic 'look and feel' approach of that change in order to deliver confidence, resilience and reassurance to City stakeholders;
- recommending the appropriate City project management & procurement route to deliver that change;
- overseeing the technical design & implementation aspects of any HVM proposal;



- ensuring there is sufficient capacity, capability and availability of HVM resources to respond in relative 'fast time' to emerging security threats & vulnerabilities, including appropriate processes across all parties to trigger their consideration & proportionate deployment;
- providing oversight to the existing processes to manage HVM requirements for third parties on the public realm, such as developers, the police and special event organisers;
- ensuring due process for changing the public realm is followed, including appropriate engagement with stakeholders & Members;
- acting as the interface with the City Police's wider Secure City programme in terms of HVM measures;
- co-ordinating the activities of Transport for London, the City Police and the City Corporation in identifying & mitigating threats, vulnerabilities and impacts on the Transport for London Road Network in the Square Mile;
- making recommendations to the Senior Security Board in respect of public realm security matters, as well as preparing reports, presentations and briefings for the SSB.

#### **Standing Members:**

- Dept of the Built Environment (Highways) – Ian Hughes (Chair)
- Dept of the Built Environment (City Transportation) – Sam Lee
- Dept of the Built Environment (Public Realm) – Simon Glynn
- Dept of the Built Environment (Thames Bridges & Structures) – Paul Monaghan
- Dept of the Built Environment (Planning Development) – David Horkan
- Dept of the Built Environment (Transport Planning) – Craig Stansfield
- City of London Police – Lorenzo Conigliaro; Mark Haddon; Dai Evans
- Open Spaces – Martin Rodman
- Chamberlain's – Julie Smith
- Town Clerk's (Strategic Security) – Richard Woolford
- Transport for London – Siwan Hayward; John Strutton

#### **Other Representatives (Core Group):**

- Dept of the Built Environment (Transportation & Public Realm) – Zahur Khan
- Town Clerk's (Contingency Planning) – Gary Locker
- Chamberlain's (Procurement) – Darran Reid
- City Surveyor's (City Property Security) – Simon Causer
- Media Team (Town Clerk's) – Sanjay Odedra

#### **Other Representatives (By Exception):**

- Comptroller & City Solicitor's – Deborah Cluett

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All invitees are to nominate an appropriately briefed and responsible deputy if unable to attend.



## **Public Realm Security Advisory Board**

Wednesday 28<sup>th</sup> August 2019  
10am  
Room 10, North Wing

### **AGENDA**

1. Police Update
2. London Bridge inquest
3. NaCTSO Assessment Criteria
4. Security for Buildings & Developments
5. Transport for London
6. Governance
7. Security Programme:
  - a. Phase 1 Approved locations update
  - b. Matters for decision
  - c. Rapid response / fast time deployment
8. Events
9. Resources & Procurement
10. Previous Actions Arising
11. AOB