

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: plncomments@cityoflondon.gov.uk



From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection

Date 26 July 2024
Our Ref 24/04420/NPLN
Your Ref 24/00635/FULL

Subject 55 Fleet Street London EC4Y 1JU

Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).

Thank you for your memorandum. I have reviewed the application and I would recommend that the following conditions be attached to any consent :

There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required

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prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

No live or recorded music shall be played at such a level that it can be heard outside the premises or within any residential or other premises in the building.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

The use hereby permitted shall not be open to customers between the hours of 23:00 on one day and 08:00 on the following day.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Self-closing mechanisms must be fitted on the entrance door before the use hereby permitted commences and shall be retained for the life of the premises. The doors must not be left open except in an emergency or for maintenance purposes.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used so that the noise level in the proposed bedrooms does not exceed NR30 and does not exceed NR35 in other habitable rooms attributable to the proposed use of the ground floor and/or basement levels. The report should consider anticipated noise levels within the proposed usage, the sound insulation properties of the party structures and any possible noise flanking pathways. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter.

REASON: To protect the amenities of residential occupiers in the building in accordance with the following policies of the Local Plan: DM21.3, DM21.5.

Regards

Donal Rooney

Environmental Health Officer

Pollution Team

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Dear Kieran McCallum,

Great to meet you at 55 Fleet Street today and I really do feel that this was a worthwhile meeting with the applicants and yourself.

The applicant's proposal to utilise the site for the purpose of a "miniature casino" type gambling establishment is one that I haven't encountered before, but my advice will be based on the crime profile for the local area and the potential threat assessment that I would associate with a venue such as this one.

Having spoken with the applicant at the site, I was able to establish that the premises will operate on a card and cash basis, which is usual for their business. They confirmed that they would look to maintain a conservative cash-based flow of around £15,000 on the site on a weekly basis, held in the machines or within a electronic safe, held on the shop floor. The machines would be emptied on a weekly basis and the money deposited via the operating taking this to a banking establishment.

The store was stated to operate with two members of staff, a remote CCTV system that was monitored locally, access-controlled door to basement toilets for patrons and a further application to be submitted for the upper floors to be converted to residential apartments. (Further office space was to be established within the basement rooms but not confirmed for what use at the point of meeting).

Store front -

It would be my recommendation to ensure that due to high value items and money maintained on the property, that the property be treated as one would treat a Jewellers. The replacement of the current aluminium fitted glazed units with an integrated door and window set meeting the following standard - LPS 1175 SR3/4 rating as a minimum, the glazing should be rated to a standard similar to EN1627 RC5 of P7B glazing. This resistance is achieved through the use of several different layers of polymer and lamination and provides a high level of resistance to attack.

The applicant mentioned that the use of electromagnetic locks was a common feature with the front entrance, should they wish to restrict access. It would be my recommendation that the applicant would be better advised to not retrofit any security features, such as Maglocks to the external door set due to that fact, that the testing methods for all accredited door sets are done with the originally fitted locks and fixtures. In this instance, a door set with an electro- magnetic strike lock would be far more advisable.

The externally glazed units that run to the side of the property in Pleydell Court, would also have to be replaced and meet the aforementioned glazing standards to the front of the property.

When consideration is given to the change, the property would benefit from a review of the low-lying footplate to the frontage, that extends to the Pleydell Court. It would be of benefit to consider the structure integrity of this part of the building and its ability in maintaining structural integrity, should it subject to a vehicle-based attack with an enhanced glazing and door system.

Further consideration should be given to the current side entrance within Pleydell Court and also the scalable building furniture to the side of the property (vents and drainpipes). The windows in line within the reachable distance of the external piping etc. should be replaced with glazed units that meet a minimum of PAS24;2022.

Internal

The commercial space within the property that is proposed for use is small. The introduction of a number of "slot machines" would potentially drastically reduce the floor space.

The upper floors of the property are proposed to be used for residential purposes.

There is only one internal door within the space, which leads to the basement and upper floors. It was stated by the applicants that they wished to utilise the basement toilets for the establishment. It would be my recommendation to the applicants that this idea should be abandoned. The proposed use of the basement toilets would open the property to issue of

unrestricted access to the upper floors of the property and also allow for nefarious users of the business to allow access from the Pleydell Court entrance into the property. This exit on Pleydell Court, would form an essential means of access to the residents on the upper floors and also an important fire egress point. This would mean that the door set would have to meet fire safety regulations and be fitted with green push button door releasers and also green break glasses.

It would be my recommendation, that should the property maintain the current interior door, that this should meet a minimum standard of LPS 1175 SR3 rating to effectively control access into the commercial part of the property. (This would offer a reasonable escape route should the premises come under attack from determined offenders.

The exterior door set for Pleydell Court, similarly should meet a security rating of LPS 1175 SR2. This is lower than the frontage of the property, but I have balanced this against the dual layer of security and the prospect that it could be reasonably assumed that the doors are unconnected.

The proposal of moving the toilet facilities into the commercial space of the property would significantly reduce the potential operating footprint of the property and I'm sure that the HSE requirements would potentially find issue. There is also the consideration of where any cash desk/staff position would be placed within the venue.

The property should be fitted with an alarm system that meets with an alarm system that meets with BS EN 50131 Grade 4 from an accredited NSI or SSAIB company. This alarm system should be fitted with a panic alarm system and be monitored by a Central Station Alarm company. This system should be fitted along with a CCTV system that meets with BS 7958 and BS 62676 standards and should be installed by a professional supplier.

Any furniture that would be installed within the venue should be affixed to the floor.

Any safe on the property, which was meant to be placed on the commercial floor of the property, should be rated to a minimum of EN 1143-1:2012 Grade 3 rating. Placement of the safe would be dependent on the security adopted for the venue.

I have reviewed the usual specifications aligned with gambling establishments within the UK and it would seem prudent to adhere to their guidance in this instance, as such a recommendation for the cashier station, would be for the position to be fitted with a reinforced screened area where they can operate safely. This is a small environment and not akin to a larger casino style venture.

I'm unclear of this rule, but on reading it would seem that under the Gambling Act 2005, it is prohibited for any venue to operate with clear views into the property. This would increase the importance of staff actively monitoring those approaching or loitering outside of the venue.

In this instance, whilst I have no objections to the planning application, it does appear that to meet the security requirements commensurate with the risk associated with the premises, it would require a substantial amount of capital investment, which I would make an application as a condition of build, should the project move forward.

I wouldn't support the property being operated 24hrs a day, especially linked with the residential property potential above. Further to that, the potential for the property to attract crime, would be greater.

I hope that this report finds you well, and if you have any further questions or concerns, please do not hesitate to contact me.

Yours sincerely

PC Russell Pengelly

Design Out Crime Officer/Architectural Liaison Officer - ASB/Crime Prevention Advisor

Partnerships and Prevention Hub

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