

July 27 2020

Deliveroo Editions Planning Application 2020/2367/P

Introduction

I am the Chair of the Cresta House Residents Association [CHRA] and as a member of the Local Residents Group [LRG] I spoke on behalf of the LRG at the Appeal in June 2019.

I am writing to object to Deliveroo Editions' request for planning permission to remain on the Swiss Cottage site and to ask that they are refused planning permission.

Deliveroo Editions per se is not the problem. It is that they are here, in Swiss Cottage.

The reason Deliveroo Editions has not already vacated the Swiss Cottage site is that, on the eve of its Appeal against Camden's Enforcement Notice, it switched its delivery workforce from motorbikes to bicycles and electric vehicles [ETWs] and the Inspector found that because of such a radical change in operation, Deliveroo should be given a 14 month trial period to prove that its new workforce could meet the necessary Conditions in the Operational Management Plan [OMP].

Deliveroo claim they 'won' the Appeal. They did not. They won a stay of execution.

The Inspector made her priorities clear in her Appeal Decision:

"The Main Issues are:

a. the effect of the development on the quality of life of neighbouring occupiers and the amenity of the surrounding area, having particular regard to:

- Noise and disturbance*
- Odour*
- Highway safety*
- The character and appearance of the premises and the surrounding area*

b. the effect of the development on local employment, businesses and the economy

c. whether any harm can be overcome by planning conditions or planning obligations

... all conditions are imposed to manage the impact of the development and to safeguard the amenity of neighbours [Decision:116.]

*"The **conclusions** on these issues **will inform whether the use is acceptable for the property and is appropriately located...**" [Decision:10 and 11]*

In their Planning Statement Deliveroo relied on the Monitoring Report undertaken by Firstplan and the Transport Statement undertaken by Transport Planning Associates.

The ensuing noise, transport and odour reports concluded that the 'trial run' had been successful and that the site 'does not have an unacceptable impact upon the amenity of neighbouring residential properties and that its use of the site 'does not result in unacceptable harm to highway safety'.

The methods used to gather information on odour and highway safety in these Reports influenced the validity of their observations. The conclusions drawn from these findings should therefore be discounted.

The Planning Statement ignored the reports of breaches of Conditions local residents submitted to Deliveroo.

These had been amassed by residents from the start of the trial period in August 2019 to July 2020 and in accordance with the Community Working Group {CWG} monitoring system set out in the OMP.

By mid July 2020 residents had recorded 400+ violations of the Conditions. [Please see Appendix 1: Breaches of the Conditions]

Instead of being ignored, these damning reports should form the backbone of this Consultation.

Deliveroo cannot claim that the trial period was a success. Rather, Deliveroo Editions demonstrated throughout the trial period that it was not able to meet a significant number of Conditions in the OMP and that its Riders continue to have an unacceptable impact on local amenity and continue to pose an unacceptable threat to highway safety.

I will confine my arguments to the following issues: [Other residents will deal with further issues]

1. Deliveroo has not stopped the cooking smell nuisance caused by their 9 kitchens
2. Deliveroo has not stopped its riders from congregating outside the site
3. Deliveroo has not stopped its riders from Cycling the Wrong Way on the road or cycling on the footpaths
4. Deliveroo Refuses to comply with the Condition that Riders must turn left to exit the site
5. Deliveroo cannot meet its obligation to reliably identify its riders
6. The Local Community and the Community Working Group [CWG]
7. Deliveroo Editions Does Not Benefit the Local Community
8. Assessment of the Trial Period
9. Conclusion

1. Deliveroo has not stopped the cooking smell nuisance caused by their 9 kitchens.

The Camden London Plan [CLP] requires all developments likely to generate nuisance odours to install appropriate extraction equipment and other mitigation measures [par.6.22]

The smell nuisance from Deliveroo's multi- kitchen operation began when Deliveroo began its cooking operation on site and continues to this day. It is particularly noticeable when the wind is blowing from the south or south west.

Residents, especially from Cresta House [on the upper left in photo], whose 3rd to 9th floor windows are *higher* than and *above* Deliveroo's three storey industrial extractor vents, have over the past three years lodged numerous complaints on Camden's Environment Web site and to Deliveroo.

[Please see Appendix 2: Odour Complaints vs Deliveroo Editions]

Camden cited the vents as part of their June 1 2018 Enforcement Notice, to "permanently remove the three (3) extract ducts from the west-facing elevation of the property" and the Inspector noted in her Decision that *"...the installation of the extract duct...is harmful to the character and appearance of the surroundings and fails to comply with CLP Policies A1 and D1 and the relevant Camden Planning Guidance on Design."* [Conclusions: 63]

Residents do not understand why, at the Appeal, Camden now finds the extract ducts acceptable.



November 2 2017@13:05 View from the gardens and bedroom windows in Dobson Close

"The ducts are appropriately situated because they are not unduly prominent...and are largely screened from view" [Planning Statement 5:31; 5:32]

In the 22 years I have lived here I have never had cause to complain about cooking odours coming into my apartment. I have suffered debilitating odour nuisance since the arrival of Editions three years ago. There are days when it comes deep into residents' apartments and lingers for hours at a time. There are days when it is so strong that it makes me feel sick.

Deliveroo has consistently refused to take responsibility for the cooking smells. They insist that they cannot possibly be coming from their kitchens because "*The Deliveroo Editions site uses the most efficient odour extractor available*" and because their site team wasn't able to identify the smell "*... despite a full walk around the site at ground level.*" [GD: 02.06.2020]

Instead, they try to blame local residents, who are not allowed to cook or barbecue on their terraces and who do not, as a rule, cook all day every day from noon til 11p.m.

Or they try to blame the other local restaurants nearby: MIA, Kentucky Fried Chicken and McDonalds, who were all here before Deliveroo Editions and when there were no smell complaints. In any case, all were closed down during COVID-19 while smell nuisance was still being reported.

Only two restaurants are close enough to be a possible source of the smells. Of these, Rest Bar, at 117 Finchley Road, closed down well before the COVID-19 crisis. The other, Zzang, has remained open and Deliveroo suggests that it is the source:

"the site team identified a strong oily cooking smell coming from the Zzang kitchen next to the Editions site, which I believe has a vent on the roof next to Deliveroo's duct." [GD: 02.06.2020]

It is inconceivable that Zzang's one kitchen could generate the volume, frequency and particular variety of cooking smells experienced by local residents – especially in comparison to the variety, volume and frequency of cooking smells from Deliveroo's nine different kitchen cuisines.

Deliveroo home delivers for Zzang.

Deliveroo could compare the timing of the smell complaints with their records of the food deliveries they carry out for Zzang. They know what time the order went out: they know when it would have been cooking.

But Editions have not chosen to do this. Nor have they commissioned their experts to conduct the one smell test that would really matter: to assess the smells at source as they leave the extractor vents.

Instead, they are waiting for the Council to take part in a site visit [GD: 02.06.2020] which has yet to happen.

Deliveroo did, however, commission a sniff test Report for their Planning Statement. Firstplan monitored four locations around the site – *all at ground level*. This renders the results meaningless because the complaints come mainly from Cresta House whose residential flats do not begin until the fourth floor. [Firstplan: Review of OMP: 3.16]

Firstplan observed 13 cases of 'generic' cooking smells in their 14 one-hour site visits. They concluded that the odour was '*slight...borne on the wind...origin not definitely proven...*' and therefore to "*not be having a detrimental impact.*"

The smells would indeed have been 'slight' when experienced at ground level and not where they originate four storeys above. The surveyors attributed the cooking smells as coming "*conceivably from the site*"; "*possibly from the site extract*"; "*from direction of the site*" - and sometimes from "*an unknown source*" - but never as coming from Edition's kitchens. [Around-Site Monitoring: ii Odour]

Deliveroo claim they tried to monitor the smells from the third or fourth floor of Cresta House but could not gain access because the building manager wasn't on site during peak hours to let them in. [par.3.17] Cresta House residents would of course have given access had they been asked, but they weren't.

It is Deliveroo's responsibility to clear itself as the source of this nuisance. Residents have logged complaint after complaint, year after year, but to no avail, so far.

It is worth considering that it is not in Deliveroo's best interest to get to the source of the odour nuisance. As they say, they are already using the "best" odour extracting equipment available. If proper testing were to reveal their kitchens as the source of a smell nuisance – and their state-of-the-art equipment can't get rid of it - the obvious solution would be to shut down their kitchens.

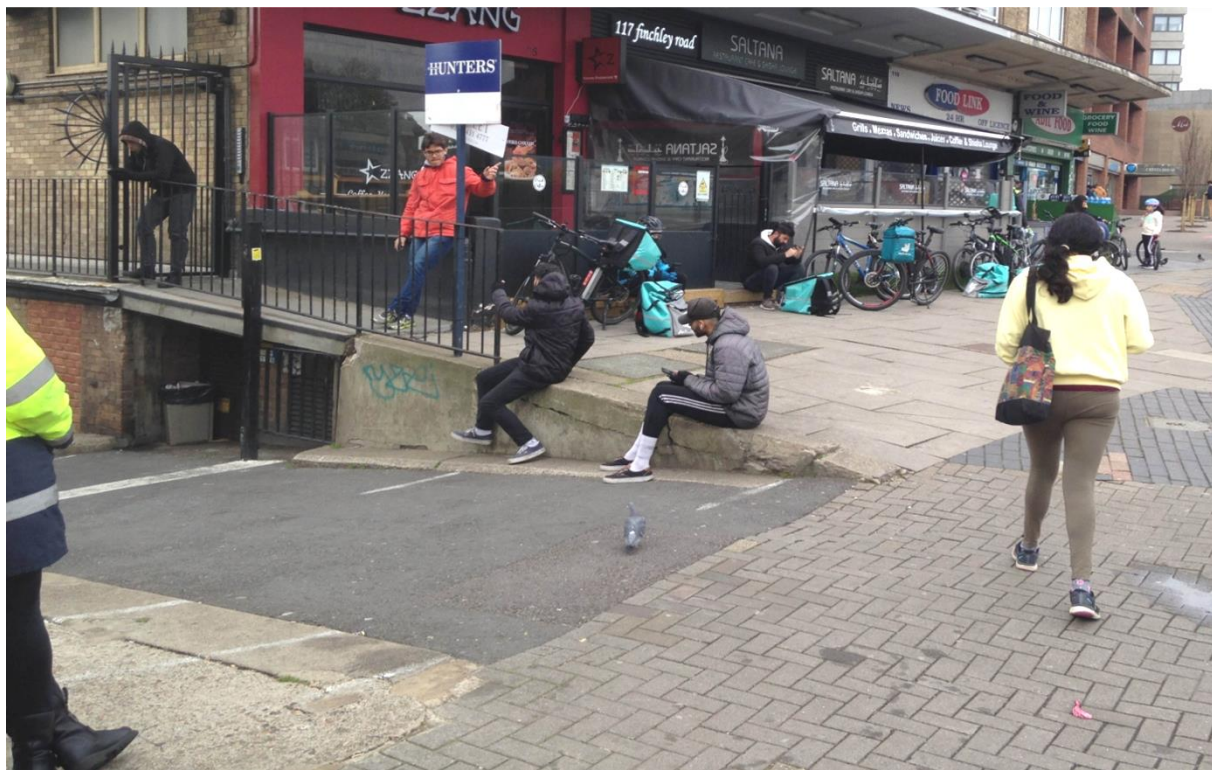
2. Deliveroo has not stopped its riders from congregating outside the site

Deliveroo Marshals are charged in the OMP with the obligation to ensure that Riders do not congregate outside of the property.

In its Planning Statement, Deliveroo ignored entirely the Condition that seeks to prevent Riders from congregating outside the property, a Condition that is there to protect the local amenity.

Instead, in a sweeping two sentence summary, Firstplan concluded that:

"...the Site is operating in accordance with the OMP as evidenced by our visits. The rules appear to have "bedded in" well and the riders...are well versed in how to enter the Site, park their bike/EV and head inside to collect their order." [Planning Statement: 1.5]



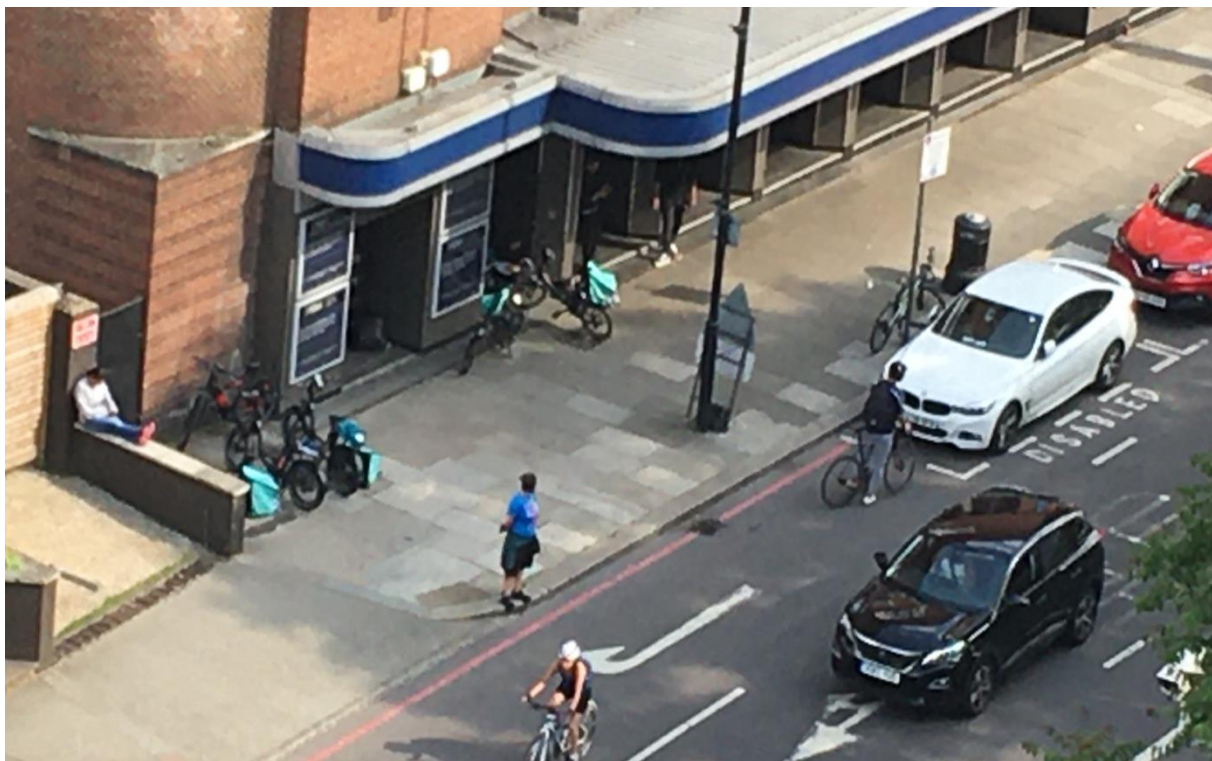
April 18 2020@13:54 [MH]

Nine months into the trial period Riders still congregate at the top of the slip road. The Deliveroo Marshall [left in photo] looks on.

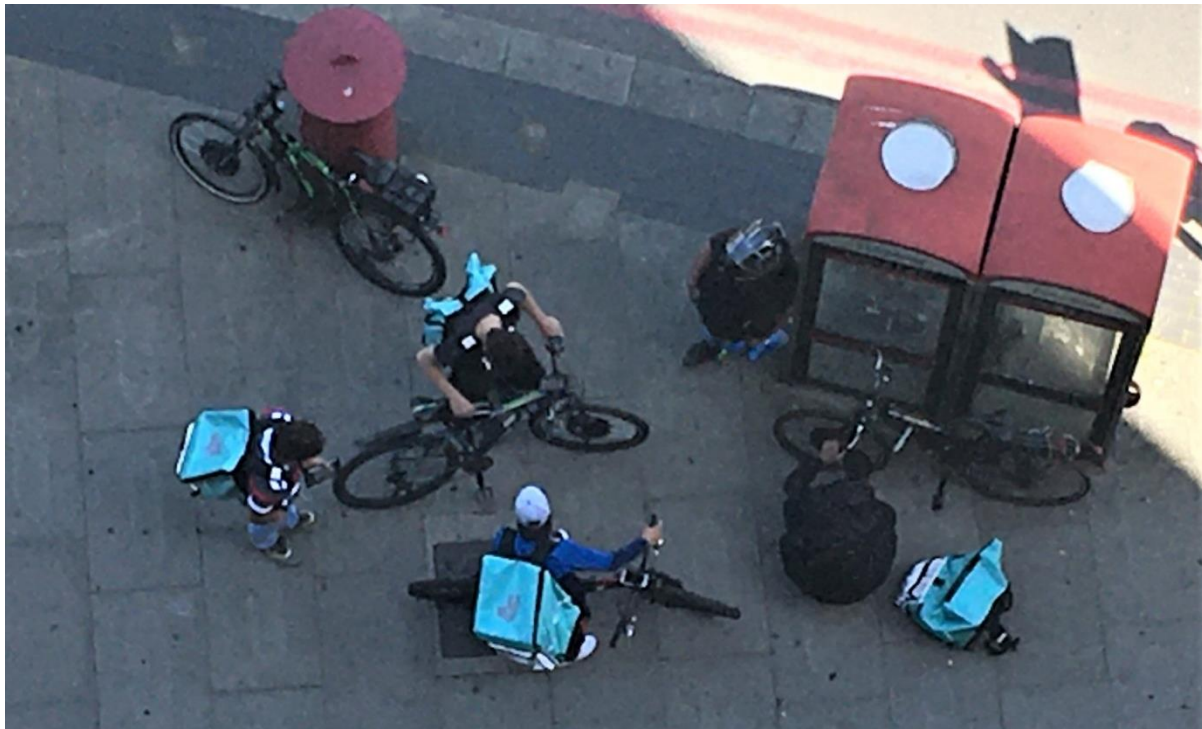
Ten months into the trial period and Riders still congregate just outside the site.



May 16 2020 @14:28[MH] Riders spread out in front of Overground House and Barclays Bank just north of the Deliveroo slip road



May 27 2020@16:36 Riders congregating in front of the Odeon Swiss Cottage directly across the street from the slip road



May 28 2020@14:35 Riders spread out on the pavement in front of Cresta House on Finchley Road

In June, when Deliveroo's submission for Planning Permission was well underway, Marshals began a serious push to stop Riders from congregating in the immediate area of the site. The Riders just moved a bit further away, and generally congregated somewhere out of sight of the Marshals.



June 18 2020@ 19:27 [MH] Riders In front of Swiss Cottage Pub – just out of site of the slip road



July 16 2020@ 14:45 [DP] Riders Congregating in Harben Road



June 18 2020@18:28 Riders congregating behind the Odeon Cinema



June 29 2020@17:59 Riders congregating on Avenue Road in front of the library

The problem for Deliveroo Editions at this particular site is that their Riders have no choice but to spread out around the neighbourhood while they wait for orders because they have **nowhere else to wait**. They are not allowed to be on site without a confirmed order yet have to stay close enough to Deliveroo to be assigned orders via their app.

At the same time that Riders congregate further afield from the site, countless others, individuals or pairs of Riders, while not technically ‘congregating’ also wait at various other points beyond the site boundary.

We have reported these Riders as well, because cumulatively – on Finchley Road by the 603 bus stop, in the private entrance to Castleden House on Finchley Road, sitting along the concrete ledge in front of the Swiss Cottage library, along the back of the Odeon Cinema, behind the metal shed by the Farmers Market site near the Hampstead Theatre, behind the bushes of the Ye Old Swiss Cottage Pub and behind the railing at the tube entrance by the pub, on the pavements in Harben Road, Dobson Close, Belsize Road and Hilgrove Road, behind the wall in front of MIA restaurant, in the children’s’ playground in front of the Swiss Cottage library, in the corner by Overground House, hoicking their bikes up and down the tube stairs by Cresta House – they, their bikes and their big bags have a surprisingly strong negative impact on our daily lives. They take over not only the public space but too much of the visual space in our local environment. They are *everywhere* in a constant swarm of coming and going and waiting around that is visually exhausting.

Deliveroo has two stock responses to our reports of these activities.

They either claim that the Deliveroo Riders we complain about are not *their* Deliveroo Riders:

*“... the riders were not riding for Deliveroo, but were **travelling to McDonalds** on behalf of another food delivery company...”* [GD: 17.06 2020]

*“...an increased frequency of riders cycling on the pavement in the area, **on their way to the nearby McDonalds.**”* [GD: 17.06 2020]

- which is hard to prove either way.

Or they claim that:

“... riders, as with anyone else, have a right to use public spaces if they are doing so in a safe way that does not cause noise or disturbance...” [GD 25.05.2020]

That is to say, Deliveroo Riders have the right to park themselves, their bags and bikes in public spaces while waiting for work orders from Deliveroo as long as they don't disturb anyone.

Applying this same logic, business owners throughout the UK, who would like to employ more people than their office space allows, could do the same thing – and set out desks, chairs and computers on nearby pavements so they too can have a larger workforce nearby without the need to house them.

It is one thing for a private citizen to avail himself of public spaces. It is another thing entirely for a private business to spread its workforce out into public space and expect to be allowed to commandeer that space as a normal extension of their company. This is why, for example, Councils require commercial physical activity providers to pay for a license to conduct personal training in public parks.

Deliveroo seems to refuse to acknowledge this. While individual riders may indeed make their own choice as to where to wait, what harms local amenity is the *cumulative* effect when all the Riders exercise this freedom in the same public spaces.

It is Deliveroo Edition's unique business model that triggers these unacceptable behaviours. It is Deliveroo Edition's unique business model at Swiss Cottage that requires the use of public space as an integral part of its operations.

If it transferred its Swiss Cottage operation to an Industrial Estate the problem would disappear.

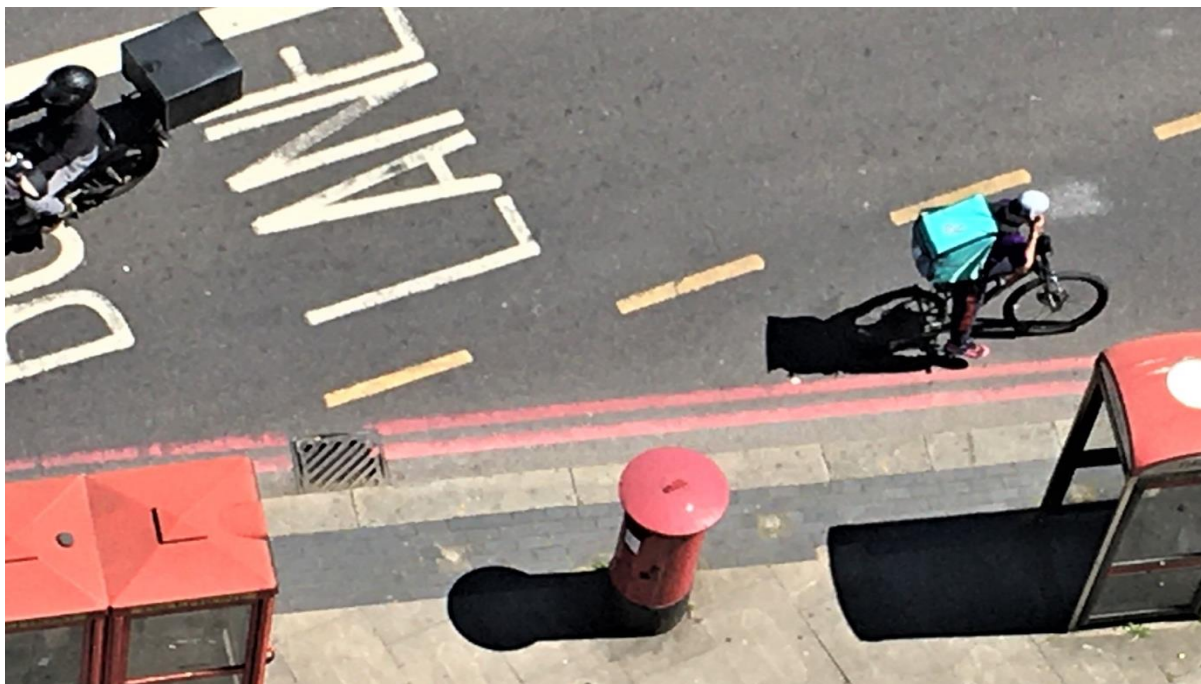
3 Deliveroo has not stopped its riders from Cycling the Wrong Way on the Road or cycling on the Footpaths

It is a Condition in the OMP that Marshals will ensure that "Riders respect the highway code and that Riders do not obstruct or ride along the footway"

It is almost a year into the trial period and Editions Riders still cycle in the wrong direction on the A41.



June 26 2020@19:56 [MH] Rider cycling the wrong way on the A41 just north of the Deliveroo kitchens



May 30 2020@13:34 Rider cycling the wrong way on the A41 towards nearby Deliveroo kitchens

Nor have the Marshals, as mandated in the OMP, managed to keep Riders from cycling on the pavements:



July 18 2020@12:53 [MH] Outside Barclays Bank



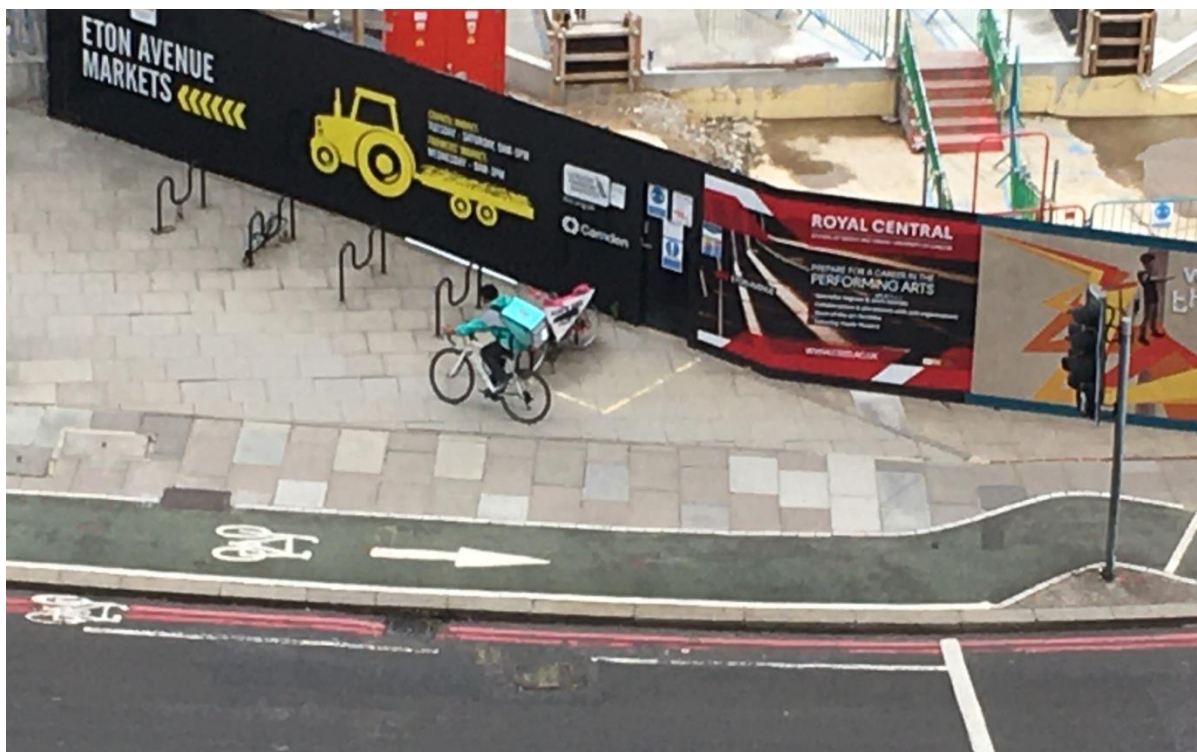
July 6 2020@19:08[MH] In front of Cresta House heading to nearby Deliveroo kitchens



July 1 2020@18:58 [MH] Cyclist in front of Overground House



July 4 2020@19:44 Cyclist In front of Cresta House heading towards Deliveroo kitchens



July 1 2020 @14:51 Rider with delivery order cycling by the hoardings at 100 Avenue Road

Or from turning right and cycling south on the pavement when they exit the site:



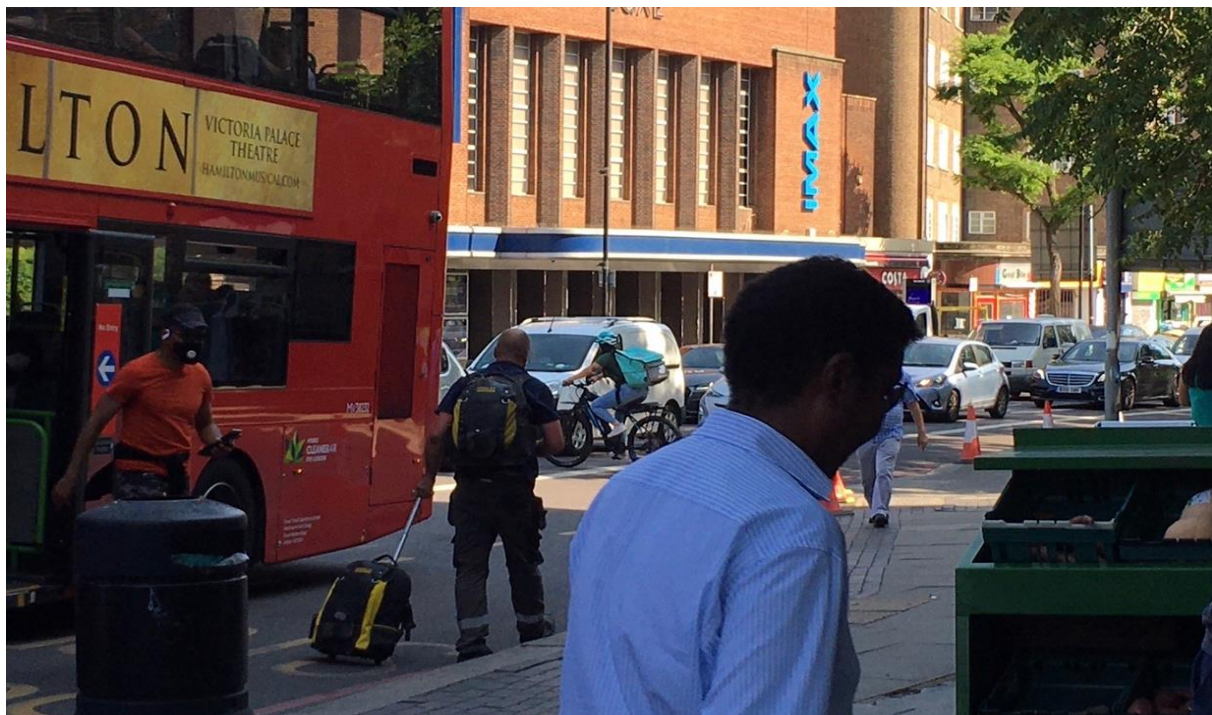
July 6 2020@19:22 [MH] Rider cycling on pavement on Finchley Road towards St Johns Wood

4 Deliveroo Refuses to comply with Condition that Riders must turn left to exit the site

“All Riders will be required to turn left to exit the Site, and bicycle Riders will be prohibited from turning right and walking their bike on the pavement down Finchley Road” [OMP:4:6]



July 16 2020 @16:14 [DP] Rider heading straight ahead across the A41 as he leaves the slip road



June 23 2020:16:18 [DP] Rider heading straight out of the slip road and cutting across the A41



June 30 2020@16:19 [DP] Rider heading straight out of the slip road and cutting across the A41



July 1 2020@18:29 Rider not turning left out of slip road and cutting across oncoming traffic



June 10@18:22 Rider cutting across oncoming traffic

All these Riders did not turn left as they exited the site. They went straight ahead out of the site and cut across five lanes of oncoming traffic in order to reach the far right-hand turning that heads south via Avenue Road.

Deliveroo appeared willing to recognize this Condition when then Public Relations Manager, Will Tricker [WT] wrote in response to several reported incidents of Riders not turning left as they left the site:

*"...riders must access and exit the site in accordance with the Highway Safety Code. This includes informing riders that **they must turn left when they exit the site...**" [19.02.2020]*

However, in the same email, Mr Tricker went on to claim that a Rider who rode straight ahead out of the site and did not turn left was **not**, in fact, committing an infraction as long as that Rider's *intention* was to "head south".

"... a number of the incidents you shared with us included a rider exiting the site crossing the A41, to head south-bound. This is not an infraction of the site's planning conditions, and so no further action has been taken in regards to these reported incidents" [Will Tricker 19.02.2019]

When asked to justify how Deliveroo could ignore the Condition, Mr Tricker said that the Condition was written the way it was in response to "the Inspector's concern that riders would be tempted to turn right when exiting the site and cycle on the pavement to head south" [WT: 06.03.2020] – and had nothing, therefore, to do with her seeking to avoid possible danger on the A41.

The Inspector had expressed her concern in her Decision:

“The available highway safety data is not conclusive evidence that the site is able to operate safely...the volume of traffic [on the A41] is such that delays occur for riders waiting at the site entrance which in turn may increase risks and encourage hazardous turning and weaving movements...” [Decision: 54]

Had the Inspector’s concern been confined only to Riders turning right out of the site she would have written the Condition accordingly. She did not: the condition unequivocally states that **“All Riders will be required to turn left to exit the Site”**.

Throughout the trial period Deliveroo ignored this Condition and the copious evidence residents provided of riders not turning left as they exited the site.

The Condition appeared, however, in their proforma Monitoring Report. In 15 hours of monitoring it noted only two Riders who didn’t turn left, and that following that first survey the number of Highway Code breaches *“...dropped considerably...a clear sign that the measures being used at the Site are effective at controlling this once the rules are understood.”* [par.5.19]

The reason the number of breaches ‘dropped considerably’ is that the surveyor gathering the evidence was positioned at the top of the slip road – in view of the Marshal on duty and Riders entering and exiting the site. Surely the Marshal and Riders would have adjusted their activities accordingly once they realized they were being scrutinized?

In any case, the findings of the Report are at odds with the experience of local residents who observed Riders heading straight forward out of the site several times an hour during peak times throughout the trial period. [Appendix 1]

In a matter of such concern as the safety of its Riders and the motoring public, it would have enhanced Deliveroo’s case if they had tried to provide the ‘conclusive evidence’ that the Inspector alluded to in par.54 of her Decision. They could have invited Transport for London [TfL] to provide an updated confirmation that the practice of cyclists cutting into five lanes of oncoming traffic poses no danger to motorists or the new ETWs workforce.

But they didn’t.

They provided instead the following quote *taken from TfL’s website*:

*“We will work with Camden Council to make the traffic-dominated Swiss Cottage area **safer and less intimidating.**”* [TPA Report: 2.24]

And they provided a report from Transport Planning Associates that recycled one Personal Injury Accident data report from TfL that covered the 60 months leading *up to 30 September 2019*. [TPA Report: 2.21].

The Report cited 59 *personal injury collisions* in that period, of which three in 2017, one in 2018 and one in 2019 were *serious* accidents.

In her Decision, the Inspector concluded that

“ The development did not achieve a safe and suitable access for all users of the highway and in particular it created conflict between pedestrians, cycles and vehicles.” [par.58]

The fact that statistics have not yet caught up with reality doesn't mean there isn't an accident waiting to happen.

There is a new 'Deliveroo' risk to motorists and cyclists on the A41.

Since the recent crackdown on Riders congregating near the site, Riders have taken to waiting on the far side of the Odeon cinema, in front of the Swiss Cottage library, behind the barrier of the Swiss Cottage tube station entrance and behind the bushes next to the Pub's garden. When they get an order they take a short cut to avoid the two sets of traffic lights they would have to cross in order to access the site. They cut directly across the A41 – but from the *other* direction – from the *east*. Riders setting out from the library *first* cut across the south bound traffic on the Avenue Road – and *then* cut across the A41.

Unsuspecting motorists are now confronted with cyclists or jaywalkers wheeling bicycles coming at them on Avenue Road and from *both* sides of the A41.



June 22 2020@ 20:41 Rider heading west towards Deliveroo from the opposite side of the A41



July 4 2020@ 19:48 Rider heading west towards Deliveroo from the opposite side of the A41



July 4 2020@19:52 Rider heading west towards Deliveroo from the opposite side of the A41

Deliveroo, Camden Council and the LRG all agreed to this Condition.

Deliveroo cannot be allowed to change the meaning of a Condition to suit the difficult realities of its operation.

5 Deliveroo cannot meet its obligation to reliably identify its riders

Under the Conditions of the OMP Deliveroo is obligated to “ensure that Deliveroo is able to identify any Riders reported to Deliveroo as not complying with any of the above off-Site [Conditions]” . [par.4:9 Deliveroo Rider Deliveries; OMP]

Deliveroo has to be able to identify its Riders in order to comply with the ‘3-strikes-you’re-out’ policy whereby Riders who are issued warnings three times in three months will be dismissed.

Deliveroo says that all they need to identify their Riders is the precise time and location an incident occurred. By looking back at data for a specific time period they can *“identify riders logged on to the Deliveroo app at a particular time in a particular location, without photographic evidence.”*

[WT: 06.03.2020]

In all our reported breaches we provided the date, time and location of the incident and in almost all 400 cases provided photographic backup of the incident.

Yet Deliveroo experienced difficulties identifying the riders committing the incidents we reported throughout the trial period. More often than not they used that difficulty as an excuse to not issue a warning. Often they blamed the photographic evidence we provided - evidence they claim they do not need.

*“As you rightly point out, accessing the site from Dobson Close is a clear breach of the OMP...
Unfortunately, on this occasion, we were not able to identify the rider in question...”*

[WT: 19.02.2020]

*“We have not been able to identify the other riders in this picture, **due to the quality of the image**”*

[GD: 22.05.2020]

*“... on some occasions, it will be **difficult for us to identify a specific rider if they are in a group of riders who are also logged into the Deliveroo app.** [GD 29.05.2020 email to Diana Pao]*

*“ We have sought to identify the riders from this image, but given the **significant distance** from which the picture was taken, we were unable to do so.” [GD:02.06.2020]*

*“...we were **unable to identify the riders ... images are some distance from the site** and as a result **cannot be assumed to have any relation to the Editions site...**” [GD: 17.06 2020]*

When I asked for clarification of their identification policy I received the following response:

“To confirm, in every instance where a breach of the OMP occurs, and the rider in question is identified, we will issue a notification to that rider. The only occasion where a notification for a breach of the OMP would not be issued is in the rare instance that the rider in question cannot be identified, which would of course mean that no notification could be issued.”[GD:22.05.2020]

The system of identification is clearly not working. But cyclists do not need to be licensed. Deliveroo will never be able to identify its workforce reliably as long as its Riders do not have to be licensed.

6 The Local Community and the Community Working Group [CWG]

The Inspector stated that “monitoring would be essential for the trial period to achieve its purpose” and that “a Community Working Group is an integral part of the planning agreement.” [Conclusions:114]

Residents were to monitor the site and report breaches of the Conditions to Deliveroo. Deliveroo were to act upon these reported breaches to try to ensure that the Conditions were met.

Six months elapsed before Deliveroo convened the first CWG meeting in February 2020. They blamed Camden officers for taking that long to supply them with the invitation list. As required, residents had monitored Deliveroo activities and by then had documented **80** breaches of the OMP.

[Appendix 1: Breaches of Conditions from September 14 2019 – February 4 2020]

In the three months following the CWG meeting, Rider deliveries fell by a third during the COVID-19 lockdown. Local residents reported a further **22** breaches of the Conditions despite the fact that they were immersed in personal health and family issues and the logistics of self-isolating and there were far fewer deliveries. [Appendix 1: Part 2: Reported Breaches of Conditions: February 5 2020 – May 4 2020]

It was Deliveroo’s then Public Affairs Manager, Will Tricker [WT], who first responded to these reports. In equal measure he: either agreed the breach occurred and said he would warn the Rider; said he would warn the rider even though Deliveroo didn’t have to according to the Conditions; or outright refused to warn the rider on the grounds that no breach had taken place.

In the final months of the trial period Deliveroo made an all-out effort to bring its Riders into line. Local residents were still observing some degree of self-isolation, but managed to report a further **300+** breaches of the OMP. [Appendix 1: Part 3: Breaches of Conditions from May to July 22 2020]

Deliveroo has dismissed four Riders in the twelve months since the trial period began. [Transport Statement: TPA: 2.4]

Deliveroo replaced their Public Affairs Manager with the Head of Public Affairs –UK and Ireland, Giles Derrington.

Responses to this last tranche of reported incidents, while seemingly cooperative and always deferential, became ever more reluctantly actioned or outright dismissive the closer it came to Editions’ Submission for Planning Permission and the likely Consultation.

Responses nearly always began along the lines of:

“We appreciate you bringing this incident to our attention. As you know, Deliveroo is committed to ensuring that riders respect the local community and local residents. Deliveroo takes public safety and the safety of our riders extremely seriously...”

Followed either by:

“We have identified the riders in question and issued notifications to them on the basis of a breach of the provision of the OMP ...”

or

“ In investigating this particular incident, we are mindful that it did not take place directly outside the site and that self employed riders, as much as anyone else, have a right to use public space... providing they are not obstructing pedestrians, gathered in large groups, making excess noise or riding their vehicles on the pavement...

However, we have taken the view in this case that action should be taken in accordance with the Operational Management Plan’s (“OMP”) provision that “riders do not congregate outside the site”...

or

“In relation to these four images, we have not notified the riders in question as it is not apparent that there has been any breach of the OMP...”

Responses always ended along the lines of:

“Deliveroo is committed to being a good neighbour and to ensuring that the Editions site continues to operate in a way that supports local residents and benefits the local community.”

[All above GD: 22.05.2020]

In mid-June Mr Derrington announced that while Deliveroo would continue to *acknowledge* our reports of incidents they would henceforth action them or not action them as they saw fit and no longer explain or justify their reasons for doing so:

“... in instances where they do not contain any breach of the OMP or of Deliveroo’s rider agreement, we will not be replying in full.” [GD: 17.06 2020]

Deliveroo did not cite any one of our **400+** reported violations of the OMP in their Planning Statement but referred only to the Monitoring Reports provided by Firstplan and Transport Planning Associates. [Page 19 above]

In their Summary of Engagement with the CWG, Deliveroo portrayed the local community as uncooperative and disinterested in the CWG.

They claim to have received no response from the groups they contacted between December 18 2019 and January 15 2020. That is not true:

- As Chair of the Cresta House Residents Association I received an invitation on December 18 2019. On December 19 2019 I replied that I would be attending
- The London Residents Group [LRG] who had sat across the table from Deliveroo for the three days of the Appeal hearing were not invited to the CWG and wrote to complain about this. [email from Jo Blagden to John Sheehy: 08.01.2020]

Deliveroo claimed that members turned down the offer for a second meeting on April 9 2020. They did not explain that the reason residents gave for turning down the offer was their concern that a meeting would not serve the purpose of the CWG because COVID-19 had made it impossible to monitor activities on the site.

At the May 2020 CWG meeting, Deliveroo Consultant Rebecca Stevenson [RS] essentially reprimanded residents for carrying out the remit of the CWG when she chided residents for monitoring the activities of Deliveroo Riders. She questioned how our consciences allowed us to hound the riders who were only trying to make a living when we knew our reports could lead to their dismissal. [Video CWG: 27.05.2020]

At that same meeting Ms Stevenson gave the impression that the observations and opinions expressed by the Inspector in her Decision would not carry weight in any objections we might make to the Planning Application. She said that what mattered were just the Conditions and the s106 Agreement.

When I questioned whether this could possibly be true, Mr Derrington confirmed that:

*“ ...it is the OMP and S106 Agreement that are the conditions “by which Deliveroo must abide... The rest of the Inspector's findings are **not legally binding** pronouncements, but serve as **background** to the reasons behind the requirements...” [GD:29.05.2020]*

7 Deliveroo Editions Does Not Benefit the Local Community

1) *"The Site is situated within a busy town centre where commercial development is encouraged..."*
[Planning Statement 1.6]



July 22 2020@ 17:00 Deliveroo premises in the lower left corner

To try to defend the unacceptable impact of their Swiss Cottage operations on local amenity, Deliveroo Editions make much of the fact that their premises lie [at the outermost edge] within a *"defined town centre"*.

However,

- The premises are in the back lower level of 117 Finchley Road
- The one entrance to their premises is not in the main road but down a side slip road that leads – not to other commercial enterprises - but to the heart of a peaceful residential community.
- Local residents derive no 'town centre' advantages of *"accessibility to services and facilities"*. On the contrary, they are not allowed to step foot on the premises [residents monitoring the site complain of instances of intimidation from Riders and staff] and they cannot collect food from it.

- The reason the site has “*not historically been subject to operating restrictions*” is that previous businesses never encroached upon the neighbouring community.

2) *“The site only trades for 11 hours a day (12:00-23:00) during day-time hours, on Mondays to Sundays...a total of just 77 hours per week, which equates to just 46% of the hours in a week.”*[5.10]

To gloss over the fact that they have just summarily increased their opening hours of 12:00 - 23:45pm from four days a week to seven days a week – a fact let slip at the recent CWG meeting [27.05.2020] - Editions present their trading hours as if they are doing the neighbourhood a favour.

Are residents, disturbed by the relentless comings and goings of Riders, scooters and delivery vans outside their windows and gardens, supposed to count themselves lucky that:

- the site ‘*only*’ trades for 11 hours a day - from noon to 11p.m.
- the site ‘*only*’ trades during day-time hours:
- the site trades for a total of ‘*just 77 hours per week*’ which is ‘*just 46% of the hours in a week*’.

In any case, none of this is true. The reality is:

- deliveries begin at 8am and the site doesn't close down until 12pm. The site operates for **16** hours a day
- The hours of 6pm to 11pm are night time hours – not ‘daytime’ hours
- When delivery hours and the extra closing hour are factored in, the site is open not ‘*just 77 hours per week*’ but an additional 35 hours per week which means the site is operational a total of **112** hours a week – a whopping **66%** of the hours in a week.

3) *“The Site provides an essential delivery service to local people, particularly during the current COVID crisis”* [Planning Statement: 1.6]

Deliveroo Editions does not provide an ‘*essential*’ service to anyone. Fire-fighters, nurses, doctors, care workers, teachers, transport workers, hauliers, and sanitation workers: *they* provide ‘*essential*’ services. Delivering cooked meals to people who prefer not to cook for themselves is a pleasant indulgence – not a necessity.

Editions claims it is “*... particularly proud of the role riders have played.. in delivering food to people unable to leave their homes during the current COVID-19 crisis.*” [GD: 05.06.2020]

When asked what percentage of their deliveries brought basic food necessities to people in lockdown, Deliveroo would not answer [RS: CWG video call: 27.05.2020] If they are as proud of this service as they claim to be, one imagines they would have included the number of housebound people they have helped in their Planning Statement. They haven’t.

If Deliveroo Editions were not available here in Swiss Cottage, this 'essential' local service could, at the touch of an app, be available to the same local community it now serves from some other food delivery service, such as Uber Eats.

4) *"The site has created 29 new jobs for local people"* [Planning Statement: 1.6]

Deliveroo claims to have created a "significant" number of jobs and opportunities for local people. It has not. Of the 29 people employed at the Swiss cottage site a mere 6 are employed by Deliveroo and they do not claim that they are local. They offer no statistics on the number of Riders that are local.

5) *"The site facilitates the growth of new and existing restaurants"* [Planning Statement: 1.6]

Deliveroo cannot rightly claim to facilitate the growth of new **or** existing restaurant businesses in the local area. They claim to be '*passionate about supporting restaurants*' but the only 'local' restaurants they are passionate about in Swiss Cottage are their own nine kitchen-only restaurants and the restaurant 'partners' that pay them to become partners on their site.

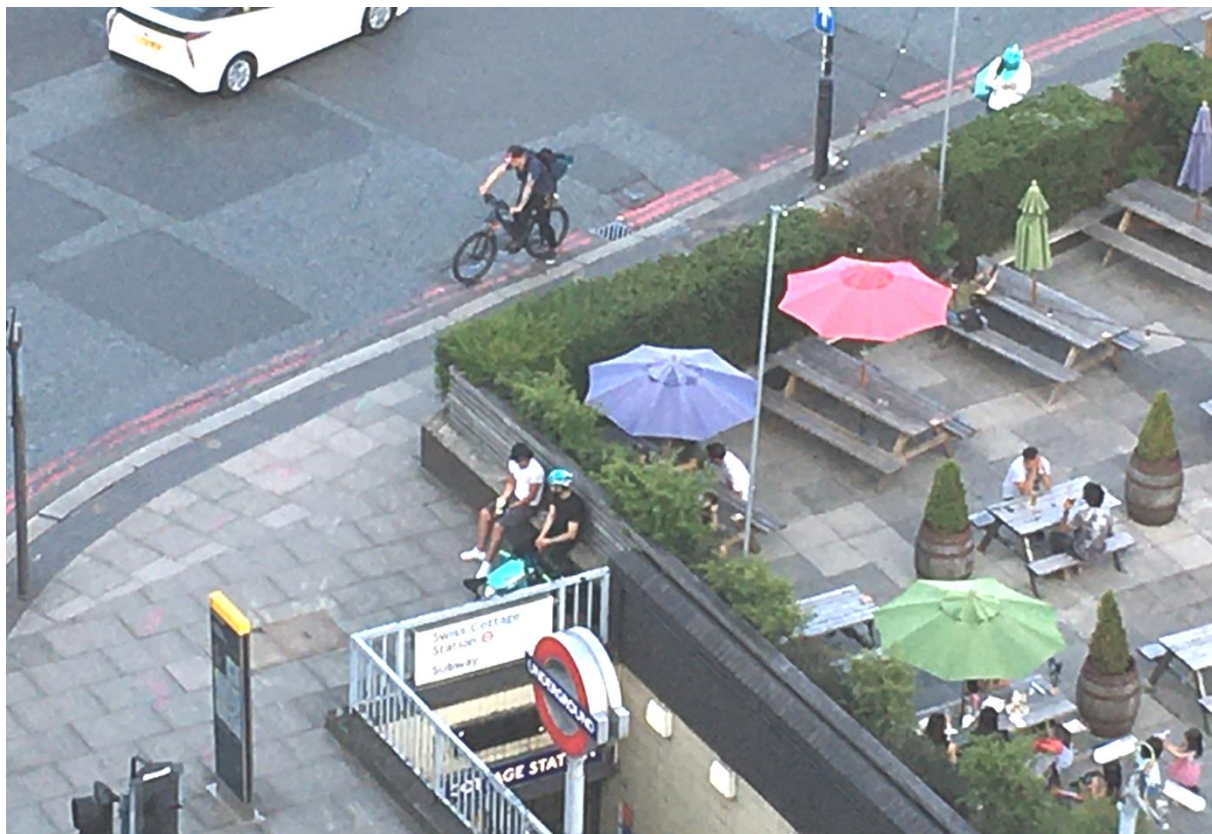
All the other nearby restaurants find themselves in direct competition with Deliveroo and many, in conversation, have told me their profits have declined since Deliveroo began operating in the area. It is perhaps not coincidence that several local restaurants, some neighbourhood favourites for years, have gone out of business altogether since the arrival of Deliveroo: Guglee, Sparkles, Café Caesar, La Voss/ Romeo, Rest Bar and Estanzia Brazil.

8 Assessment of the Trial period

“The acceptability of the development rests on appropriate and effective mitigation being secured through the use of planning conditions and the planning obligations in the 106. These measures offer protection to amenity and the quality of life for near neighbours and local residents. But for the reasons set out above it is uncertain whether the substantial harm identified would be mitigated sufficiently to ensure overall compliance with the development plan.” [Decision:Par.106]

The trial period awarded to Editions so that it could prove it could operate at Swiss Cottage without harming local amenity and the quality of life of neighbours and local residents – is over.

This is what it’s like to live here now:



July 18 2020@19:36

Mid July 2020 and almost a year to the day the trial period began: a Deliveroo Rider is cycling north in the south bound lane on Avenue Road; another Rider is checking his mobile for an order behind the bushes by the Swiss Cottage pub; and two Deliveroo Riders are waiting for orders behind the tube station railing. Members of the public socializing in the pub garden are surrounded by people who are at work for Deliveroo.



July 6 2020@ 12:57 [MH] At the back of the Odeon Swiss Cottage on Avenue Road



July 1 2020@18:58 [MH] Pavement in front of Cresta House and Barclays Bank



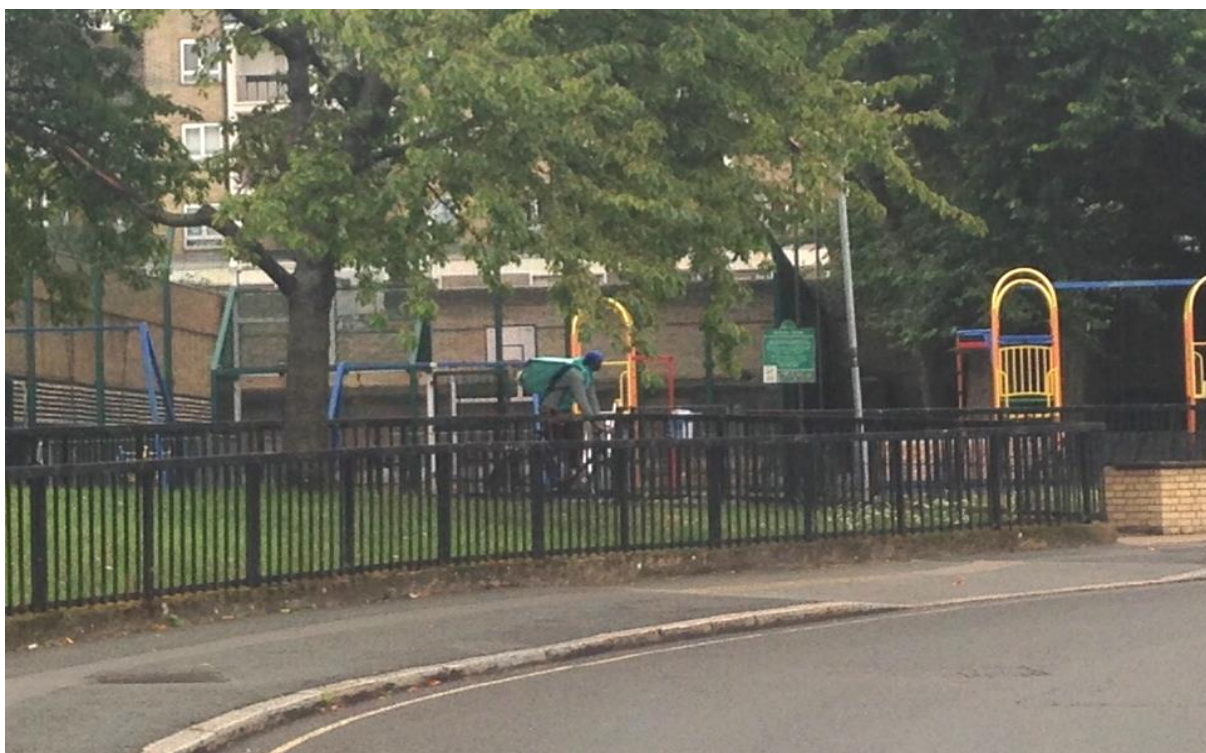
July 22 2020@17:10 [NB] Blocked public footpath on Harben Road corner Belsize Road



July 1 2020@18:35[MH] Public footpath in front of Swiss Cottage Pub garden



July 19 2020@18:37 Rider using Dobson Close, a private Camden housing estate road, as a shortcut to Hilgrove Road, Adelaide Road and points south



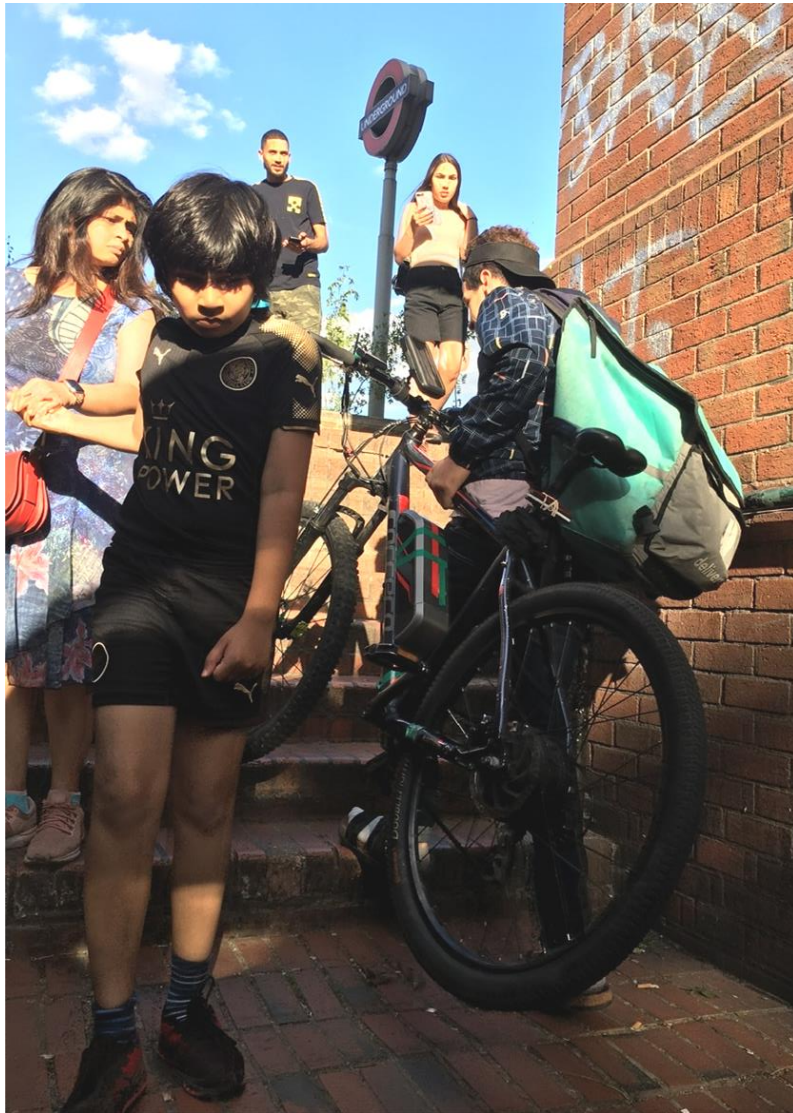
July 25 2020@18:51[MH] Rider cycling on pedestrian walk past playground from Dobson Close to Hilgrove Road



July 25 2020@18:51 [MH] Riders and bikes cluttering the pathway on Hilgrove Road



July 25 2020@18:53[MH] Rider cutting through from Dobson Close to Hilgrove Road



July 22 2020@18:30 Steps at Swiss Cottage tube station by Cresta House

9) CONCLUSION

For Deliveroo Editions to be allowed to remain on the Swiss Cottage site, they had to prove they meet the Conditions laid out in the OMP and s106 Agreement.

“...the OMP and S106 Agreement. It is these documents by which Deliveroo must abide” [GD:29.05.2020]

Deliveroo Editions have not made their case.

Instead of demonstrating their compliance with the OMP Conditions, Editions offered the following arguments:

- Deliveroo Editions does not have ‘an unacceptable impact upon the amenity of neighbouring residential properties’ and complies with policies A1 and A4 of the Local Plan when the site’s situation in a busy town centre, its limited hours of operation and the conclusions of the monitoring exercise and noise and odour reports are taken into account.
- The permanent use of the Site does not result in ‘unacceptable harm to highway safety’ and complies with policies A1 of the Local Plan based on the conclusions of the transport statement
- The Site has created a significant number of jobs and facilitates the growth of new and existing restaurants.
- The Site has been particularly important during the COVID-19 crisis.

In this submission I have made the case that:

- the site’s situation in this particular town centre is of little to no benefit to local residents.
- the site’s hours of operation are 112 hours per week not 77 hours per week as claimed.
- the manner in which the monitoring exercise of Riders’ and Marshals’ behavior was carried out - in full view of those being monitored – renders the results unrepresentative and hence the conclusions drawn from them wholly unreliable.
- the results gathered from monitoring a severe smell nuisance that originates three stories above ground by sniffing around the site at ground level were unrepresentative and the results therefore should not be taken seriously.
- the arrival of Deliveroo Editions has not facilitated the growth of new or existing restaurants. Their competition has caused several local restaurants to decline and possibly close down.
- the creation of six jobs does not outweigh the harm to local amenity caused by Editions on this site.
- Editions have not backed up with evidence their claim to have made many essential food deliveries to local people housebound by COVID-19.
- Editions’ compliance with London Plan and Local Plan policies is to be expected. I do not view them therefore as a ‘positive’ argument but as policies they would need to comply with wherever they were sited.

I have provided facts and photographic evidence that prove that Riders:

- continue to congregate in public spaces just outside the site and well beyond it

- continue to cycle on the public pathways and against the traffic on the highways
- continue to cut across five lanes of oncoming traffic on the A41 on a regular basis

Other than its unsubstantiated claim to have helped many housebound people during the COVID-19 crisis – a crisis that will one day pass – nowhere else in its Conclusions does the Statement claim it benefits local residents.

Instead they appear to present as being positive the double-negative claim that their operation does *not* have an ‘*unacceptable*’ impact on local amenity and highway safety. This appears to be a convoluted way to try to skirt the fact that their operation *does* have an impact upon local amenity and does cause harm to highway safety – at a level that is *acceptable* to Deliveroo Editions. It is not acceptable to the local community.

Residents have endured three extremely difficult years as the result of Deliveroo Editions operating at the Swiss Cottage site for which they did not have planning permission. It was left to residents alone to monitor Deliveroo’s activities throughout this time.

They are extremely concerned about how Deliveroo Editions will operate should they be given permission to remain on site permanently. They fear that Deliveroo Editions would no longer have the incentive to continue to comply with the conditions.

I believe the Inspector assumed that the CWG would need to carry on in order to keep in check the continuing harm to local amenity that will be caused by Editions at Swiss Cottage:

“ the visual harm to neighbouring residents would be a constant and it has been necessary to put in place a community working group to minimise disruption to amenity and the environmental harm on the local community.” [Decision: 109]

But residents cannot and should not be expected to monitor Deliveroo Editions in perpetuity. Yet the concern is that if they don’t keep an eye on Deliveroo Editions no one will.

I fear that granting Deliveroo permission to remain on site would be tantamount to granting them permission to carry on with their operations however they choose.

This is a devastating prospect for the local community.

Fortunately, Editions does not have to be here. They are not a struggling new company that needs the backing and support of the Council. They have the backing of a £3 billion enterprise that can move them on elsewhere.

I urge the Council to do the right thing for this neighbourhood and refuse to give Deliveroo permission to carry on these unacceptable and harmful behaviours in perpetuity.

Edie Raff
Chair, CHRA
Member of LRG

Appendix

Appendix 1. Breaches of Conditions: September 14 2019 – July 25 2020

These reported breaches of the Conditions of the OMP are a fraction of the breaches that occur every day but go unreported if there is no one there to see them.

As it is, in any random 10 minutes spent around the site there will be at least one breach every few minutes and more in peak operational times.

There would, therefore, be thousands more reported incidents if residents monitored the site throughout all its hours of operation and not just when they were passing by. As it is, a few proactive local residents – in some degree of lockdown for the past four months and dealing with serious personal health and family issues – nonetheless recorded the 400+ breaches reported here.

A photograph supports every incident recorded below. The very few exceptions are incidents that happened when no camera was available.

Part 1. September 14 2019 – February 4 2020:

September 14 2019@13:48 Deliveroo rider rides on public pathway towards Deliveroo slip road

September 14 2019@13:58 Rider didn't turn left out of slip road but cut across the A41

September 14 2019@13:59 Rider didn't turn left out of slip road but cut across the A41

September 14 2019@13:59 Deliveroo riders didn't turn left out of slip road but cut across the A41

September 14 2019@14:02 No traffic marshalls on duty at lunch time

September 15 2019@14:23 Rider didn't turn left out of slip road but cut directly across the A41

September 21 2019@12:33 No traffic marshalls on duty

September 21 2019@12:35 Moped Rider didn't turn left out of slip road but cut across the A41

September 26 2019@17:17 Deliveroo Rental e-bike parked in the bus lane on Finchley Road

September 28 2019@13:36 Rider didn't turn left out of slip road but cut across the A41

September 28 2019@13:38 Rider didn't turn left out of slip road but cut across the A41

September 28 2019@13:40 Another rider didn't turn left out of slip road but cut across A41

October 5 2019@13:21 Rider cut directly across the A41

October 5 2019@13:24 Delivery outside of permitted hours

October 6 2019@14:38 Deliveroo cyclist cycled on the pavement heading towards Deliveroo

October 6 2019@15:21 Rider cycled on pavement heading toward slip road

October 18 2019@15:56 Deliveroo cyclist rode on pavement heading to the slip road

October 27 2019@ 16:39 Rider didn't turn left out of slip road but cut across A41

October 27 2019@16:40 Deliveroo cyclist rode on the pavement

November 10 2019@15:39 Deliveroo cyclist cycled on the pavement towards Deliveroo

November 10 2019 @15:39 Deliveroo cyclist didn't turn left out of slip road but cut across the A41

November 12 2019@11:21 Deliveroo cyclist cycled on the pavement up Finchley Road

November 13 2019@13:57 No traffic marshals on duty

November 14 2019@15:53 Deliveroo cyclist cycled on the pavement on way to slip road

November 14 2019@15:53 Deliveroo cyclist cycled on the pavement on way to slip road

November 22 2019@12:00 I was almost knocked down by a rider riding at speed on the pavement in front of Cresta House

November 23 2019@12:35 Deliveroo cyclist rode on the pavement from cross light south to Deliveroo slip road

November 23 2019@12:35 Cyclist with Deliveroo knapsack rode on the pavement from cross light south to Deliveroo slip road

November 24 2019@13:45 Deliveroo rider rode on sidewalk heading towards Deliveroo slip road

November 24 2019@13:48 Deliveroo rider cycled wrong way on the Finchley Road

November 24 2019@13:53 Deliveroo rider cycled on sidewalk towards slip road full of pedestrians

December 7 2019@13:34 Deliveroo rider did not turn left leaving the slip road but cut across A41

December 7 2019@13:36 Rider turned into slip road from riding up pavement from south

December 7 2019@13:39 Moped rider did not turn left leaving the site but cut across traffic on A41

December 7 2019@13:39 Bicycle Rider did not turn left out of slip road

December 7 2019@13:39 Rider blocked public pathway

December 8 2019@14:17 Deliveroo rider rode the wrong way on A41 motorway

December 8 2019@14:18 Rider did not turn left out of slip road but cut across the A41

December 8 2019@14:19 Rider rode sidesaddle on public pathway towards slip road

December 8 2019@14:22 Rider did not turn left as he exited slip road

December 8 2019@14:25 Rider turned right out of slip road and rode on public pavement heading south

December 15 2019@13:08 Deliveroo rider rode the wrong way and on pavement down Finchley Road

December 15 2019@13:17 Cyclist cut across the A41

December 15 2019@13:21 Moped rider cut across the AA41

January 3 2020 @17:54 No guard in sight on slip road

January 19 2020@12:41 Moped didn't turn left but cut across the A41

January 19 2020@12:48 Cyclist didn't turn left; second cyclist waiting for traffic to stop so he can also pull out across the A41

January 26 2020@20:53 Deliveroo cyclist rode on pavement in front of Barclays Bank into Deliveroo slip road

January 26 2020@20:54 A second cyclist rode on pavement in front of Barclays Bank into Deliveroo slip road

February 1 2020@12:29 Deliveroo cyclist did not turn left as he exited slip road but crossed the A41

February 3 2020 @18:32. No marshall in sight on slip road

February 4 2020@18:20 Deliveroo cyclist on pavement in front of Barclays bank heading towards Deliveroo

February 4 2020@18:30 Moped rider didn't turn left out of slip road: cut across the A41

At the same meeting, two other local residents, Jo Blagden and Vicky Stacey, submitted their observations:

We cannot be responsible for 24 hour monitoring of the site. However, the times we have passed the site over six months, we have witnessed breaches. We can provide dates and details of breaches. These are an indication of a likely pattern of activity most of which is backed up with photographic/video evidence.

1. Cones on pavement or at top of slip road - this is done some days but not all section 4 of POM.
2. Signage removed late last year and not replaced.

3. Deliveries of uniforms and food over a number of weeks - delivery driver using Dobson Close
4. Oui Chef deliveries early morning – 7.10, 7.15, 7.20 AM
5. Noise – arguing delivery driver (Oui Chef), offensive language, early morning OMP “Section 6 Failure to comply” evidence of log of this 5 Dec. 2019
6. Registered electric cyclist using **petrol moped** (16 January 6 pm) and parking in Dobson Close to collect an order. Said he has used his petrol moped “a lot” and has parked on roads around the Deliveroo site ... How many other couriers are using petrol mopeds/other forms of transport, therefore arriving at the site with a helmet but no visible mode of transport and not being challenged by the security team?
7. Guards mostly inside the gate down the slip road – not monitoring incoming/out-going vehicles so they cannot monitor out-going left-hand turn only
8. Congregating on the slip road and smoking - it is not allowed on site under the OMP, this has been on going over the last few months but we didn’t note the dates.... Also congregating on the steps into Dobson Close, leaving litter.

25 July@ 8.46 delivery in Dobson Close

29 July wrong way

2 August @11.38 delivery

30 September@06:44 Oui Chef delivery

30 September Opening times notice missing

30 September No security guard at all on slip road

28 October guard socialising with riders - noisy

4 November wrong way out of slip road

6 November@07:22 Oui Chef delivery

8 November @07:15 Oui Chef delivery

25 November cones

2 December cones

3 December cones

5 December @07:12 Oui Chef delivery - shouting and swearing driver with Deliveroo staff member on slip road. Oui Chef driver took out supplies he was delivering and left them on slip road, got in the van, swearing, and drove off

11 December cones

12 December @9.22 London Workwear rental in Dobson

18 December wrong way pavement

19 December@08:38 Laundry delivery in Dobson

27 January - oui chef on slip road and Albion fine foods in Dobson

3 Feb security guard socialising with riders (noisy)

Part 2 February 5 2020 – May 4 2020

February 5 2020@19:48 Rider on pavement outside Barclays Bank heading towards Deliveroo site almost knocked down pedestrian [Reported by email]

February 5 2020@ 19:50 Deliveroo rider zoomed along pavement heading towards stairs leading down to tube station. [Reported by email]

February 8 2020@14:17 Cyclist with Deliveroo knapsack riding north on pavement past tube stairs

February 8 2020@14:17 Cyclist with Deliveroo knapsack riding sidesaddle [he got off bike when he saw me] south on pavement towards slip road

February 8 2020@14:17 Motorcyclist having a coffee in front of Overland Offices. Maybe 5 minutes later he walked, helmet on, down the slip road towards Deliveroo dispatch

February 8 2020@14:21. Two Deliveroo cyclists not turning left as they leave Deliveroo but cutting across A41

February 8 2020@14:26 Deliveroo Cyclist waiting near slip road to get an order from Deliveroo

February 21 2020 @14:51: A Rider cycled into the bus lane, angled his bike at a 45 degree angle and stopped when he was two or three feet further [north] up the A41. He then readjusted the direction of his front wheel so that his bike now pointed in the direction of the A41 and proceeded straight across the A41 into the right hand turning.

March 5 2020@08:35: A delivery van - Johnsons Restaurant & Catering Linen (by London Linen) parked in Dobson Close. The driver stepped inside it. One of the van's rear doors opened and a stream of "water" appeared from the van, at first a fast flow, then a trickle, then a spurt, then it stopped.

March 5 @21.45: a Rider cycled down College Crescent on the wrong side of the road and crossed at the crossing, got onto the pavement and cycled 10 meters before hopping off by the phone box and walking down to Deliveroo. A second rider cycled a short while down the pavement. Both were just outside the view of the security guards.

March 7 2020: 3 complaints about cooking smells sent to Deliveroo and Camden Environment Complaints web site

March 17 @ 06:50: Three or four men in hi vis wear coming and going from kitchens entrance. road... moving stuff down to the bin... noise of heavy items being taken out of the building and being dumped in waiting vehicles or bin.

March 17 @ 22:30: heavy cooking smells coming into Cresta House. Same as all last summer and only not reported during the winter months because it is too cold to want to open my windows. Residents at Cresta House made several smell complaints to Camden throughout the summer. The windows of our apartments are higher than the huge vents at the back of Deliveroo and therefore subject to the smells that come out of them.

April 4 2020@16:30. Rider cycling down Dobson Close towards the playground. Later saw him going up steps and down the slip road. Traffic marshal said something like "You're in trouble" as he headed towards the kitchen.

April 4 2020@18:58. **Bikes driving up and down [Dobson Close] all day.**

April 5 2020@14:04. Deliveroo cyclist, half dismounted so that both legs rested on his left peddle, cycled south at some speed past 2 sets of pedestrians on the pavement in front of TfL and Barclays Bank towards the Deliveroo slip road.

April 9 2020@16:18. E-moped leaving Dobson Close License plate: LG60

April 9 2020@16:20. Deliveroo rider parked in Dobson Close and sat on the grass just below the steps leading up to Finchley Road trying to keep out of sight. He was obviously waiting for notification to pick up a food order. No traffic marshal was there to report it to.

April 9 2020@16:20. Group of riders sitting behind the gate not observing the social distancing

April 18 2020 @ 13.54 At least 6 Deliveroo Riders plus bags and bikes congregating in front of Zzhang Rest. and 24 hour shops. Marshall looking on but doing nothing.

[April 23 2020: Official Covid 19 Lock down begins](#)

May 3 2020@14:12. Deliveroo cyclists gathering in front of the Overground building on Finchley Road

May 3 2020@15:43. 4 Deliveroo cyclists – not social distancing -in front of Overground building in Swiss Cottage

Part 3 May 4 2020 – the present

May 14 2020@18:00. Gathering of 8 or so riders not socially distancing, sitting on the pavement outside the Overground House building and mini-markets on their phones and two more at the top of the slip road while another rider was obstructing traffic. Security guard had her back turned to all of this. Local area looks scruffy with their bikes and bags and stuff strewn all over the place as they wait for orders.

May 16 2020@14:17 . Deliveroo riders spread out over the pavement in front of TfL and the small shops next to the Deliveroo site

May 16 2020 @14:28 6 Riders on cell phones congregating on pavement in front of Barclays and TfL

May 16 2020@16:31 Deliveroo rider on his cell phone on the pavement outside Overground House

May 21 2020 @13:20 3 Riders spread out on pavement in front of Overground House [TfL]

May 21 2020@20:05 . Riders waiting for orders by the Odeon Cinema

May 21 2020@20:08 . Another rider parked his bike and disappeared into the bushes.

May 21 2020@16:26. 2 groups of Deliveroo riders congregating outside Overground House on Finchley Road

May 22 2020. Complaints about cooking smells sent to Deliveroo and Camden Environment Complaints web site

May 25 2020. 2 Complaints about cooking smells sent to Deliveroo and Camden Environment Complaints web site

May 27 2020. Complaint about cooking smells sent to Deliveroo and Camden Environment Complaints web site

May 27 2020@16:04. 4 Deliveroo riders camping out on the pavement directly across the street from your slip road.

May 27 2020@16:05. At least 3 riders congregating on the pavement outside TfL and under Cresta House.

May 27 2020@16:49. Several riders still waiting for orders

May 28 2020@14:35. 2 riders waiting in front of Odeon

May 28 2020@14:35. Several riders waiting in front of TfL – not social distancing

May 28 2020@14:56. All riders still where they were 20 minutes ago. They are clearly waiting for orders.

May 28 [2020@15:52](#). 6 Riders waiting directly across from the site access across the A41

May 29 [2020@15:05](#) Deliveroo couriers waiting in Dobson Close

May 29 [2020@17:19](#). 2 Deliveroo riders waiting on wall in front of Cresta House

May 29 [2020@17:30](#). 2 riders waiting with bags and bicycles parked in Dobson Close in front of the reporting residents' home.

May 30 2020@13:34. Deliveroo rider cycling South on the Finchley Road towards Deliveroo site

May 30 2020@13:38. Deliveroo rider cycling South on the pavement towards D site. A second rider cycled south on the pavement towards the access road.

May 30 2020@13:38. 3 Deliveroo riders congregating on the Tube steps to the left of the Odeon Cinema

May 30 2020@13:38. Deliveroo rider parked in front of Cresta House - presumably waiting for an order

May 30 2020@14:19. Deliveroo rider cutting across A41 at 14:19 to access points south

May 30 2020@14:19. Riders in front of tube next to Odeon Cinema

May 30 2020@14:20. Deliveroo rider cycling on pavement by Odeon Cinema

May 30 2020@14:02 2 riders in Harben Rd down the stairs from the pavement in front of TfL and Cresta House.

May 31 2020@12:40. Rider coming out of path [railings on the right side] beside playground in Dobson Close

May 31 2020@12:44. Rider on electric scooter on private Dobson Close road

May 31 2020@12:46. Rider turning in to Dobson Close in order to gain access to D site from Dobson Close

May 31 [2020@13:19](#). Rider parked at bottom of steps beside Cresta House/TfL.

May 31 [2020@15:17](#). Two riders at the far end of the Swiss Cottage tube steps near the Odeon Cinema

June 2 2020@14:45-15:00. Refrigerated food delivery van leaving Dobson Close

June 4 2020@14:45 Delivery van from the company Carnevale left Dobson Close

June 4 2020@14:55. White refrigerated van registration number KF19 TLE in Dobson Close.

June 8 2020@ 21:08. Rider hanging out by the Swiss Cottage Tube Station - waiting for an order. 2 Riders waiting for orders hanging out behind barrier in front of Cresta House

June 8 2020@ 21:11 Rider cycling on the pavement heading south on the Finchley Road

June 8 2020@ 21:13 Another Rider still cycling after crossing the Finchley Road

June 8 2020@ 21:16. 3 Riders [maybe hiding?] waiting for orders further along the Finchley Road - now in front of Mia Restaurant

June 9 2020@ 21:21 2 Riders hiding at back of entrance to Swiss Cottage Tube station near Odeon.

June 9 2020@ 21:21 Rider obviously gets order and is now cycling down pavement towards Odeon

June 9 2020@21:22. Rider cycling wrong way down A41 and cutting across to site access

June 11 2020@14:09. Deliveroo bike rider and his bike on Harben Road

June 13 2020@11:58. Riders likely hiding from Marshalls in front of Mia Restaurant on Harben Parade

June 13 2020@11:58. 1 Rider cycling on pavement behind the bushes at the side of the Swiss Cottage Pub. 2 other riders perhaps hiding behind the bushes.

June 13 2020@11:59. Rider shot out from slip road right directly in path of moving car. Motorist blasted his horn. Rider gave him the finger and drove on

June 13 2020@14:12. Deliveroo riders waiting on Harben Road

June 13 2020@21:07 Rider cycling on pavement in front of Swiss Cottage pub

June 13 2020@21:10. 2 Riders not social distancing. They chatted for quite a while

June 13 2020@21:12. Rider Cycling on pavement towards Deliveroo slip road and in front of Swiss Cottage Pub

June 13 2020@21:15. 2 Riders cutting directly across the A41

June 13 2020@21:16. Rider cycling wrong direction on cycle path heading north on pavement in front of 100 Avenue Road

June 13 2020@21:16. Same Rider cycling on public pathway beside 100 Avenue Road

June 14 2020 . 3 complaints about cooking smells sent to Deliveroo and Camden web site

June 14 2020@19:35. 2 Riders cutting across the A41

June 14 2020@19:35. 1 Rider behind railings at Swiss Cottage Tube Station. 2nd rider hiding behind the bushes at Swiss Cottage Pub .

June 14 2020@18:25 Rider cutting across A41 from across the street from slip road

June 14 2020@18:25 Rider hiding behind bushes at Swiss Cottage Pub

June 14 2020@18:28 2 Riders waiting for orders beside pub Tube stairs

June 14 2020@18:32. Rider waiting for order behind Swiss Cottage Tube stairs

June 14 2020@18:32. 2 Riders behind bushes at Swiss Cottage Pub not social distancing

June 14 2020@18:34 2 Riders not social distancing crossing crosswalk towards Deliveroo

June 15 2020@17:38 . Rider hiding behind bushes by Swiss Cottage Pub

June 15 2020@17:42. Rider walking his bike among cars across A41 towards Deliveroo

June 15 2020@17:42. Rider stuck between cars on A41 heading towards right turn to points south

June 15 2020@17:44. Rider cycling on pavement by 100 Avenue Road hoardings towards Deliveroo

June 15 2020@18:47. Rider cycling on pavement next to Swiss Cottage Tube Entrance

June 15 2020@20:07 Rider cycling past hoarding heading north or east

June 16 2020@18:46 4 Riders hanging around Tube Entrance at Swiss Cottage Pub

June 16 2020@18:46 Rider cutting across A41 from across street towards Deliveroo

June 16 2020@18:47 Rider cycling on pavement behind Tube entrance at Swiss Cottage Pub

June 16 2020@18:47. Rider walking his bike across traffic on A41 heading towards Deliveroo

June 16 2020 4 complaints about cooking smells sent to Deliveroo and Camden web site

June 16 2020@18:47. Another Rider dodging traffic while walking his bike across A41 towards Deliveroo [24]

June 16 2020@18:47. 2 more Riders: cycling wrong way down A41 in order to access Deliveroo site

June 18 2020@18:26. Riders waiting for orders behind the Odeon Swiss Cottage Tube Stairs [LF]

June 18 2020@18:28 2 riders waiting for orders by Swiss Cottage Library [LF]

June 18 2020@18:28. At least 6 Riders behind the Odeon on the south direction of the A41 [LF]

June 18 2020@ 19:23. Rider cutting across A41 from the east towards slip road [MH]

June 18 2020@ 19:23 Rider waiting for order on low brick wall to the right of slip road[MH]

June 18 2020@ 19:26 Rider waiting for order at back of Odeon [MH]

June 18 2020@ 19:27 Riders congregating by steps to underground in front of Swiss Cottage Pub [MH]

June 18 2020@ 19:28 Rider waiting for order in front of library {MH}

June 18 2020@18:33. Rider parked on Harben Road checking phone for orders

June 18 2020@18:38. Man with Deliveroo bag walked from Deliveroo site, down the steps by the tube station, down Dobson Close into this car parked at the south end of Dobson close – and drove off.

June 18 2020@21:26. 3 Riders behind Odeon tube steps. Not social distancing..

June 18 2020@21:26. 3 Riders behind Odeon tube steps. Not social distancing..

June 18 2020@21:31. 2 riders behind bushes at Odeon Tube Station. Not social distancing

June 19 2020 3 complaints about cooking smells sent to Deliveroo and Camden web site

June 19 2020@20:18 Rider zooming on the pavement by Tube steps across the A41

June 19 2020@20:22. Rider cycling on pavement in front of Cresta House towards Deliveroo

June 19 2020@20:23 Rider heading for south turning cutting in front of car on A41 .

June 19 2020@20:30 Rider cycling north on pavement outside Cresta House

June 19 2020@20:32 Rider cycling on pavement on other side of the A41 by lights crossing

June 19 2020@20:37 Rider cycling on pavement switches to side saddle nearer to Deliveroo

June 19 2020@20:40 Rider cycling on other side of A41 towards Hampstead Theatre

June 19 2020@20:41 Rider cycling so fast only caught up with him by Hampstead Theatre

June 19 2020@20:43 Rider cycling past hoardings across the A41

June 19 2020@20:45 Rider cycling on pavement towards Deliveroo

June 19 2020@20:45 Rider cycling on pavement towards Deliveroo

June 19 2020@21:11 Rider hiding from Marshall in front of Cresta House

June 19 2020@21:13 Rider waiting for order behind Odeon steps railing

June 19 2020@21:14 Rider parked waiting for order at top of Tube station stairs leading to Belsize Road
[saw him go to collect order later]

June 19 2020@21:17 Rider cycling at some speed on pavement towards Deliveroo

June 19 2020@21:20 Rider behind wall in front of Cresta House near Tube steps going west

June 19 2020 2 complaints about cooking smells sent to Deliveroo and Camden web site

June 20 2020@16:47 Riders waiting for orders on Harben road

June 20 2020@16:47 Rider waiting for order on Dobson Close [MH]

June 20 2020@17:00 Rider parked behind barrier in front of Cresta House

June 20 2020@17:02 Rider cycling on pavement across A41 by hoardings

June 20 2020@19:03. 2 Riders behind Ye Olde Pub Tube stairs . Not social distancing

June 20 2020@19:03. Rider cycling at speed beside 100 Avenue Road hoardings across the A41

June 20 2020@19:03 Second Rider cycling beside hoardings across the A41

June 20 2020@19:04 Rider **cycling on pavement** in front of Cresta House heading towards Deliveroo

June 20 2020@19:05 Rider **cycling on pavement** behind Odeon Tube stairs

June 20 2020@19:29. Rider cycling on pavement to right side of hoarding towards Chalk Farm

June 20 2020@19:31. Rider cycling at some speed on pavement towards Deliveroo

June 20 2020@19:31. Rider cycling **south the wrong way on the Finchley Road** towards Deliveroo

June 20 2020@19:31. Rider cycling north on pavement by the side of Swiss Cottage Pub

June 20 2020@19:31. Same Rider cycling south on pavement by Swiss Cottage Pub towards Deliveroo

June 20 2020@19:32. Same Rider cycling south on the north bound A41

June 20 2020@19:33. Rider cycling north on the pavement past Cresta House

June 20 2020@19:33. Rider heading towards new meeting point on the East side of the Pub and Odeon

June 20 2020@19:35. Rider heading towards new meeting point on far side of the Pub and Odeon

June 20 2020@19:37 Rider **cycling south on north bound A41** [towards Fitzjohn's Avenue]

June 20 2020@19:40 2 riders waiting for orders behind railing at Ye Olde Pub tube stairs.

June 21 2020@16:24. Deliveroo rider cutting across the A41 after leaving the slip road [DP]

June 22 2020@18:36 Rider behind high wall in front of Mia Restaurant

June 22 2020@18:43 Rider cycling south on public pathway leading towards library

June 22 2020@18:46 Another rider parking behind wall in front of Cresta House to wait for order

June 22 2020@18:49 Rider coming for order from new waiting area behind Odeon

June 22 2020@18:49 Rider cycling on public pathway beside 100 Avenue Road hoardings

June 22 2020@18:50 2 Riders waiting for orders behind wall in front of Mia Restaurant

June 22 2020@18:51 Rider **driving south on A41** and then cutting across to Deliveroo slip road

June 22 2020@18:51 4 Riders behind railing at Ye Olde Pub stairs to tube;

June 22 2020@18:52 2 Riders not social distancing

June 22 2020@18:54 Rider cycling on pavement beside 11 Avenue Road hoarding

June 22 2020@18:56 1 Rider cutting across A41 to enter site: 2nd rider heading east to exit site

June 22 2020@19:03 Rider **cutting west across southbound Avenue Road** towards back of Odeon

June 22 2020@19:03 Rider cutting **west across A41** towards Deliveroo slip road

June 22 2020@20:41 Rider cutting across the A41 from the west towards slip road

June 22 2020@20:41 Rider cycling south on pavement by Ye Olde Swiss Cottage Pub

June 23 2020@16:18 Rider cutting into traffic on the A41 [DP]

June 24 2020@08:20 Delivery driver shouting for the gates to be opened at the top of slip road [VS].

June 24 2020@19:48 Rider behind railing at Odeon Swiss Cottage tube entrance

June 24 2020@19:51 Rider cutting West across A41 heading towards slip road

June 24 2020@19:53 Rider cutting across A41 towards south turning

June 24 2020@19:54 Rider cycling on pedestrian sidewalk to the left of 100 Avenue Road hoardings

June 24 2020@19:56 Rider cutting into traffic on A41. Blue car honked and slowed down to let him in

June 25 2020@16:30 Rider cutting into traffic accessing right hand turning towards the south [DP]

June 26 2020@18:38 Rider cycling up Fairfax Road [LF]

June 26 2020 Complaint about cooking smells sent to Deliveroo and Camden web site

June 26 2020@18:40 Rider waiting in Harben Road [LF]

June 26 2020@18:45 Rider carrying bike down Tube station stairs [LF]

June 26 2020@18:45 Rider carrying bike up tube station stairs at dead end of Belsize Road [LF]

June 26 2020@18:46 2 riders waiting for orders on Finchley Road a few metres south of slip road [LF]

June 26 2020@18:46 Clusters of Riders at top of slip road blocking pedestrian path [LF]

June 26 2020@18:47 Rider waiting in residential block entranceway just south of slip road [LF]

June 26 2020@19:37 Rider cycling on pavement on way to Deliveroo [MH]

June 26 2020@19:55 2 Riders waiting by 125 Finchley Road. Not social distancing [MH]

June 26 2020@19:56 Rider cycling wrong way in bus lane on the A41 heading towards Deliveroo [MH]

June 26 2020@19:58 Rider heading down stairs beside Cresta House [MH]

June 26 2020@19:59 Rider cycling side-saddle towards Deliveroo [MH]

June 26 2020@20:03 Rider cycling on pavement in front of Cresta House [MH]

June 27 2020@17:50 2 Deliveroo Riders using bench by Ye Olde pub as their office

June 27 2020@17:55 Deliveroo Rider leaving waiting area behind Odeon to collect order

June 27 2020@17:56 Same Deliveroo Rider cutting west across A41 to collect order

June 27 2020@17:58 Deliveroo Rider waited for order then left bag on the pavement in front of Odeon to walk to collect order

June 27 2020@18:01 Deliveroo Rider cycling north on pavement up Fitzjohns Avenue

June 27 2020@18:02 Deliveroo Rider cycling east on pavement by 100 Avenue Road hoardings

June 30 2020@16:17 Deliveroo cycling from slip road along pavement [DP]

June 30 2020@16:19 Deliveroo rider deep in the traffic cutting across the A41[DP]

July 1 2020@07:46 Large van parked at top of Dobson Close; engine left running while he was on site.

July 1 2020@07:55 Delivery man left kitchens with an empty pallet and walked past the guard and out the gates to wherever he had parked his van

July 1 2020@ 18:29 Rider cutting across the A41 between 2 cars

July 1 2020@ 18:29 Another Rider cutting between van and car across the A41

July 4 2020@14:50 Riders waiting for orders on pavement behind tube Vent in front of Mia Restaurant

July 4 2020@14:51 Deliveroo Rider cycling on public pathway by side of 100 Avenue Road hoarding

July 4 2020@14:52 Rider waiting for order by tube stairs in front of Pub

July 4 2020@14:56 2 Riders hanging around bus stop in front of Barclays Bank

July 4 2020@14:57 Deliveroo Rider not turning left but cutting across the A41

July 4 2020@19:32 Deliveroo Riders waiting for orders behind wall in front of MIA Restaurant

July 4 2020@19:41 Deliveroo Rider waiting for order by Central School of Speech and Drama

July 4 2020@19:43 Deliveroo Rider cutting west across A41 towards slip road

July 4 2020@19:44 Deliveroo Rider cycling on pavement in front of Cresta House

July 4 2020@19:44 Deliveroo Rider leaving hiding place behind Odeon to collect order

July 4 2020@19:46 Deliveroo Rider cutting west across A41 towards slip road

July 4 2020@19:46 4 Deliveroo Riders congregating by steps in front of Swiss Cottage Pub

July 4 2020@19:48 Deliveroo Rider jaywalking and cycling cutting west across A41 towards slip road

July 4 2020@19:49 3 Deliveroo Riders taking over area by Swiss Pub

July 4 2020@19:50 3 Deliveroo Riders not turning left but cutting across the A41

July 4 2020@19:52 Deliveroo Rider cutting west across A41 towards slip road

July 4 2020@19:56 2 Deliveroo Riders not turning left but cutting across the A41

July 4 2020@19:56 Deliveroo Rider cycling on public pathway by side of 100 Avenue Road hoarding

July 4 2020@19:56 2 Deliveroo e-scooters not turning left but cutting into the A41

July 4 2020@19:56 Deliveroo Rider cycling north towards tube stairs on pavement by Cresta House

July 5 2020@12:28 Deliveroo E-Scooter not turning left but cutting into traffic on the A41

July 5 2020@12:31 Deliveroo Rider heading towards hiding place behind Odeon Cinema

July 5 2020@12:33 Deliveroo Rider cycling on public sidewalk by Library

July 5 2020@12:36 Deliveroo Rider heading towards hiding place behind Odeon Cinema

July 5 2020@20:31 2 Deliveroo Riders waiting for orders behind the Tube stairs next to Swiss Pub

July 5 2020@20:31 Deliveroo Rider cycling on public pathway by side of 100 Avenue Road hoarding

July 5 2020@20:33 Deliveroo Rider jaywalking with bike east across A41 to access slip road

July 5 2020@20:35 Deliveroo Rider hiding behind bushes on east side of Swiss Pub

July 5 2020@20:36 Deliveroo Rider riding on public sidewalk by Library

July 5 2020@20:36 Deliveroo Rider not turning left but cutting across A41

July 5 2020@20:40 Deliveroo Rider cycling on pavement beside Swiss Cottage Pub

July 5 2020@20:40 Deliveroo Rider cycling on pavement by tube stairs in front of Swiss Cottage Pub

July 6 2020@ 19:08 Deliveroo Rider cycling south on pavement towards slip road

July 6 2020@ 19:12 Deliveroo Riders waiting for orders behind Odeon

July 6 2020@ 19:13 Another Deliveroo Riders waiting for orders behind Odeon

July 6 2020@ 19:16 Rider riding sidesaddle east across A41 towards slip road

July 6 2020@ 19:18 Rider on cell phone waiting for order behind tube entrance by pub

July 6 2020@ 19:19 Rider waiting for order on Finchley Road south of slip road

July 6 2020@ 19:22 Deliveroo Rider not turning left cycling south on pavement away from slip road

July 6 2020@19:36 Deliveroo Rider riding on public sidewalk by Library

July 6 2020@19:38 Deliveroo Rider heading towards hiding place behind Odeon Cinema

July 6 2020@19:39 Deliveroo Rider cutting west across A41 directly towards slip road

July 6 2020@19:44 5 Deliveroo Riders cluttering the pavement by the Tube stairs next to Swiss Pub

July 6 2020@19:45 Deliveroo Rider cutting west across A41 towards slip road

July 6 2020@19:45 Deliveroo Rider cycling on pavement by Cresta House heading north

July 6 2020@19:46 Deliveroo Rider cutting west across A41 towards slip road

July 6 2020@19:48 3 Deliveroo Riders waiting for orders behind the Tube stairs next to Swiss Pub

July 6 2020@19:51 Deliveroo Rider cycling on public pathway by side of 100 Avenue Road hoarding

July 7 2020 @ 12:10 Deliveroo Rider surrounded by cars cutting across A41

July 7 2020 @ 12:11 Deliveroo Riders waiting for orders in front of library

July 7 2020 @ 12:13 Deliveroo Rider cutting across A41 towards slip road

July 7 2020 @ 12:16 Deliveroo Riders waiting for orders on pavement in front of library

July 8 2020 @ 18:44 Deliveroo Rider cutting across A41 to access Right turning

July 8 2020 @ 18:44 Deliveroo Rider cycling on pavement beside hoardings at 100 Avenue Road

July 8 2020 @ 18:48 2 Riders heading towards waiting area behind Odeon

July 8 2020 @ 18:49 Deliveroo Riders hiding behind the bushes at Swiss Cottage Pub

July 8 2020 @ 18:50 Deliveroo Rider cutting across oncoming cars to access Right hand lane on the A41

July 8 2020 @ 18:50 2 Deliveroo Riders heading onto library pathway; one cutting across Avenue Road

July 8 2020 @ 18:50 Deliveroo Rider cycling on public path in front of library

July 8 2020 @ 18:51 Deliveroo rider heading towards hiding area behind Odeon

July 8 2020 @ 18:51 Deliveroo Rider squished between van and car on A41

July 8 2020 @ 18:51 Deliveroo Rider squished between cars cutting across A41

July 8 2020 @ 18:54 Deliveroo Rider cycling on public path in front of library

July 8 2020 @ 18:54 Deliveroo Scooter rider didn't turn left but cutting into traffic on A41

July 8 2020 @ 18:54 Riders still waiting for orders behind bushes at side of Swiss Cottage Pub

July 11 2020 Complaint to Editions and Camden about cooking smells

July 12 2020 Complaint to Editions and Camden about cooking smells

July 14 2020 Complaint to Editions and Camden about cooking smells

July 16 2020 3 Complaint to Editions and Camden about cooking smells

July 16 2020@13:38 Rider cycling in Dobson Close

July 18 2020@14:14 Rider cutting across A41 from slip road

July 16 2020@14:39 3 Riders sitting at bottom of slip road on cell phones

July 16 2020@15:54 Deliveroo bike parked by entrance to tube on Belsize Road

July 18 2020@12:51 Rider waiting for order just south of slip road

July 18 2020@12:53 Rider cycling on pavement in front of Barclays Bank

July 18 2020@12:57 3 Riders waiting for orders behind Odeon

July 18 2020@12:57 Cyclist waiting for order on Finchley Road by 603 bus stop

July 18 2020@12:59 Cyclist waiting for order

July 18 2020@13:08 Saturday lunch time and no Marshall on duty

July 18 2020@ 14.14 Deliveroo rider cutting across the A41 after leaving the slip road

July 18 2020@19:02 3 Riders congregating by cycle rack in front of MIA

July 18 2020@19:05 2 Cyclists waiting for orders in front of library

July 18 2020@19:05 Rider waiting for order at back of Odeon cinema

July 18 2020@19:07 Rider waiting for order on Highgrove Road

July 18 2020@19:08 Riders congregating in entrance to flats just south of slip road

July 18 2020@19:30 Deliveroo Rider Cycling at speed in Dobson Close

July 18 2020@19:30 Second Deliveroo Rider Cycling at speed in Dobson Close

July 18 2020@19:32 Riders hiding behind railing and bushes at Ye Olde Pub

July 18 2020@19:32 Rider Cycling on pavement beside 100 Avenue Road hoardings

July 18 2020@19:33 Riders infringing upon clients of Ye Olde Pub

July 18 2020@19:36 Rider cycling north up south bound A41

July 18 2020@19:37 Rider heading south on A41

July 18 2020@19:37 Rider cutting across A41 from the East

July 18 2020@ 14:14 Deliveroo rider cutting across the A41 after leaving the slip road

July 19 2020@ 18:37 Rider speeding in Dobson Close

July 21 2020@14:49 Delivery van blocking pedestrian path at top of slip road

July 22 2020@07:40 Delivery van calling out to be let on site

July 22 2020@11:46 Rider waiting in Harben Road

July 24 2020@14:37 Riders waiting the in outdoor playground by Swiss Cottage library

July 24 2020@14:42 Riders congregating in Harben Road and not social distancing

July 24 2020@17:30 -22:00 Strong kitchen smells

July 24 2020@ 18:45 and at 20:00 Strong kitchen smells from Deliveroo side of Cresta House

July 25 2020@18:30 -on Strong kitchen smells

July 25 2020@ 18:05 and 20:25 Strong kitchen smells from Deliveroo side of Cresta House

July 25 2020@ 18:51 Rider on narrow pathway next to Dobson Close playground

July 25 2020@ 18:51 Riders and bikes cluttering the pavement on Hilgrove Road

July 25 2020@ 18:53 Rider leaving Dobson Road shortcut

Appendix 2 Odour Complaints vs. Deliveroo Editions

Residents have logged complaints with Camden's Environment team about the smells from Deliveroo over the past 3 years.

Camden holds the records of these complaints. However, they only hold the complaints logged in the last few months because Camden destroys all historical complaints after a certain period of time.

The current logs of complaints are filed under Ref 270549 and Ref 271264.

From our emails to Deliveroo I was able to retrieve proof of complaints sent on March 7 [3 complaints]; March 17; May 22; May 25 [2 complaints]; May 27; June 14 [3 complaints]; June 16 [4 complaints]; June 19 [3 complaints]; June 20 [2 complaints]; June 26; July 11; July 12; July 14; July 16; Jul 2020 [2 complaints]

While we continued to log complaints [as late as yesterday, July 25] on the Council's website, we stopped cc'ing them to the kitchens because by now we kept receiving the same stock response: that they would be looking into it with their experts and the Council.