I am writing to object to Deliveroo’s application to remain in the Swiss Cottage site on 115-119 Finchley Road for the following reasons :

(1) Unsuitability of the site

Camden Council’s Planning Guidance states that “*existing industrial areas are the most appropriate location*” for commercial delivery operations such as Deliveroo’s and that “*their impact in terms of noise, odour, fumes and dust generation needs to be carefully considered and managed and they should not have a detrimental impact on nearby uses and/or residents*”. For Deliveroo to state in their Planning Assessment (Section 5.6) that there is “*implication*” in this Guidance “*that alternative non- industrial locations may be appropriate where such impacts are appropriately managed*” is an imaginative but flawed attempt to justify Deliveroo’s existence in Swiss Cottage. The location of Deliveroo Editions’ site is in a densely populated residential area and is too close to residential blocks nearby. Access to the site is via a slip road going up to Finchley Road, joining the A41. It is obvious that the physical environment of the site is not designed to accommodate a delivery service for 9 kitchens, with riders and delivery vans going in and out of a single access point from Finchley Road. To say that this location is “*appropriate for a permanent use of the site for commercial kitchens and a delivery centre*” is totally illogical. Reading too much into Camden Council’s very clear and direct Guidance is not a strong argument for Deliveroo Editions’ continuing occupation of the current site.

(2) Ineffectiveness of OMP

2.1 Management of the site – Marshals

The Surveyor’s site visit reports conclude that “*the OMP is being enforced effectively” and that “the measures have ‘bedded-in’ well and all users of the Site understand the rules*” (Review of adopted Operational Management Plan Section 5.2). Yet the incidents recorded in the reports proved otherwise. Deliveroo riders were caught cycling on the pavement when the Surveyor visited on 28th November 2019 (no appropriate action taken by the marshals), 6th & 14th December 2019 and 17th January 2020; a rider tried to gain access from Dobson Close on 17th January 2020 and another tried to use Dobson Close as a shortcut when leaving the site on 15th February 2020. Given that the OMP should have been in force soon after the Inspector’s decision in September 2019, no such incidents should have occurred during any of the Surveyor’s visits had the measures been well “*bedded-in*” or that “*all users of the Site understand the rules*”. The fact that Deliveroo’s riders were still breaching the rules set down in the OMP in February 2020 showed how ineffective the OMP is. Deliveroo riders are still trying to gain access to the site from Dobson Close (Appendix A – 4th April 2020) or cycling on the pavement (Appendix B – 2 July 2020) even now. The truth is Deliveroo cannot effectively implement their OMP.

In addition, marshals should ensure that “*riders accessing the Site from the stairs to the right of the access slope on Dobson Close and/or who approach the Site in breach of the highway code will not be permitted to enter the Site, and their order is re-assigned*” (OMP section 5). On 4th April 2020, I happened to be following the Deliveroo rider up the steps in Dobson Close (Appendix A). Instead of turning the rider away, the marshal simply said “you are in trouble” and allowed him to enter the site. This can only mean that the rider’s order was not “*re-assigned*” as stated in the OMP.

2.2 Riders

It is evident from the Surveyor’s reports and observations from local residents that Deliveroo’s riders will continue to try their luck with breaches of the OMP. Instead of turning left on to Finchley Road as they exit from the site, most of them simply head straight to cut across the A41 to head south for their deliveries, often weaving their bikes or e-mopeds among the cars (Appendix C), endangering their lives and those of the motorists. Deliveroo cannot claim to be able to ensure their riders will observe the Highway Code as such incidents have shown that despite the change to electric bikes, the behaviour of the riders remain the same.

Furthermore, Deliveroo’s riders have become a nuisance in the neighbourhood. Not only have they congregated in residential streets near the site to wait for their orders (Appendix D), they have also used Dobson Close as a shortcut to reach Hilgrove Road and Finchley Road (Appendix E), making a quiet private road into a teeming thoroughfare. Neighbours have mentioned that this is now a daily occurrence. This has a serious impact on the quality of life of the residents of Dobson Close and is totally unacceptable. As long as Deliveroo is occupying the current site, this situation will only get worse as they have simply moved the congestion at their site to nearby streets and think they have solved a problem.

2.3 Delivery vans

Delivery vans are still using Dobson Close as a car park. The most recent example is the company **Carnevale** using Dobson Close on 4th June 2020. Another delivery van was also spotted on the same day as well as on 2nd June 2020. Deliveroo had admitted that Carnevale was one of their suppliers. Once again, had the OMP been effective, no suppliers would have used Dobson Close as a car park. Just like the riders, Deliveroo’s suppliers will most likely be trying their luck and hope that no one will see them. There may well have been more incidents like this that residents of Dobson Close did not manage to spot but the fact that delivery vans are still using Dobson Close just shows that the OMP is not working.

(3) Negative impact on the local community’s quality of life

Deliveroo did not inform the local community of the changes in their trading hours. There was no written notification and the notice outside Deliveroo is still showing the old trading times (Appendix F). The increase in trading hours from 60 hours 15 mins (1700 – 2245 Monday to Wednesday and 1200-2245 Thursday to Sunday) to 77 hours a week (1200-2300 every day) is hardly a benefit for the community. Increased hours of trading means an increase of the volume of traffic on the slip road; more riders swarming the neighbourhood all day long; increased traffic on private roads such as Dobson Close being used as a shortcut; increased possibility of collisions between riders and pedestrians; more chances of accidents on the A41 when riders cut across five lanes of traffic to head south with their deliveries and more hours of cooking odour and noise invading the neighbourhood. This change in trading hours shows clearly Deliveroo’s total disregard for the impact their operation has on the local residents’ quality of life. How can Deliveroo claim to be a “good neighbour” when they care more about profits than their neighbours? Besides, Deliveroo’s actual hours of operation are from 8am to around midnight (for clearing up after the end of trading hours) every day so the transport, noise and odour problems last longer than the stated *77* hours and should be **112** hours a week. The disruption to the neighbourhood is far greater than they would like to admit.

Some neighbours have mentioned that they are now not using the steps that lead from Dobson Close to Finchley Road in order to avoid the busy traffic at the slip road of the Deliveroo site, the unpleasant cooking odour at certain times of the day as well as the litter left on the steps by the riders overnight. This shows how local residents’ lives have been impacted by the operation of the Deliveroo Editions site. No one should be made to feel such unease in using a local amenity in the neighbourhood. This is an encroachment on the local community’s quality of life.

Furthermore, some neighbours have also witnessed Deliveroo riders relieving themselves in the bushes, both in Dobson Close and the nearby Swiss Cottage Open Space. Not only is this totally unhygienic and disrespectful to local residents, it poses a health risk to the customers of Deliveroo as well. This environmental and personal hygiene problem is serious, especially during the pandemic. Camden Council must step in to put an end to it.

(4) Deliveroo’s lack of accountability for problems they created

Collectively the residents in the neighbourhood have reported a huge number of breaches of the OMP to Deliveroo in the past months. A comprehensive and centralised list has been compiled by our LRG member Ms Edie Raff and sent to Deliveroo. While some complaints have been dealt with adequately, most complaints have been dismissed by Deliveroo using reasons ranging from difficulty in identifying the offending riders in photographic evidence, riders’ rights to use pathways like everyone else, or that the riders are self-employed and Deliveroo will not be able to control where they congregate or how they behave. As long as the riders are not congregating outside the site or visible from the top of the slip road, Deliveroo considers that they have abided by the OMP. They have completely ignored the fact that the reason the riders have to congregate in nearby residential streets is a problem created by Deliveroo. The unsuitability of the site with restricted parking facilities and the “last mile” system Deliveroo uses are the direct causes of the problems the local community have to face. In order to race to the site to collect their orders, riders are forced by Deliveroo’s “last mile” system to congregate in the neighbourhood and use any shortcut they can find in doing so. Instead of accusing the residents of hounding the riders who are trying to make a living or using the riders’ self-employed status as a shield for not doing anything about the problem, Deliveroo should be reviewing their own role in this matter. Denying responsibility on the ground of the riders’ self-employed status cannot erase the truth that these riders form the main workforce for Deliveroo and their transgressions are a direct result of the “last mile” system. Had Deliveroo followed Camden Council’s Planning Guidance and used an industrial area for the Editions operation, none of these problems would have happened and the local residents would have been left in peace.

Conclusion

Ever since Deliveroo started occupying the current site in Swiss Cottage, the surrounding neighbourhood has changed and the local residents’ quality of life has been greatly affected. A number of local restaurants have closed; the shop fronts and loading bays are lined with delivery mopeds and bikes; the volume of traffic at the slip road has increased and the noise and odour pollution created by the Deliveroo Editions kitchens are a constant nuisance. The damage Deliveroo have done to the quality of life of local residents cannot be outweighed by whatever “economic benefits” Deliveroo think they have brought to the area. Monitoring reports on odour, noise and transport in support of Deliveroo’s claim to be a “good neighbour” are momentary records on certain selected days in a period of time and may not reflect the real issues residents have to face every day. The disrespect for the local community - from occupying the site without planning permission, to dismissing residents’ complaints with all kinds of excuses, to the latest stealthy act of increasing the trading hours without any written notification to the local community - already demonstrated that Deliveroo is not and will not be a “good neighbour”.

I would urge Camden Council to consider the local residents’ point of view in this case as I believe the Council recognises “the need to support the health and well-being of communities” (NPPF) and “seeks to ensure that the amenity of communities occupiers and neighbours is protected” (Policy A) when considering any application for a commercial kitchen site. The fundamental problem in this case is the unsuitability of the current site for Deliveroo’s operation, a fact that Deliveroo refuses to acknowledge. The ineffectiveness of the OMP shows that plans and reality are two different things. The plans may attempt to be word perfect but the implementation may not mirror what was written, as illustrated by examples of riders’ transgressions. Takeaway delivery is hardly innovative. To wreck the local community’s quality of life in the name of “economic benefits” as in this case is not a cause worth supporting. Please put an end to the local residents’ misery and reject Deliveroo’s application.