

Application No:	Consultees Name:	Received:	Comment:	Response:
2020/2367/P	Max Friedel	01/08/2020 20:24:58	OBJ	<p>The riders are all over the area and they make the local roads and places look a mess. They think they have right of way even when they are riding on the pavement or the wrong way on the road. Their behaviour is dangerous and irresponsible.</p> <p>The security guards are not authoritative and are not able to properly control the coming and going of riders and other traffic in and out of the site.</p> <p>There is noise from the site. People come early in the morning and leave noisily late at night. Deliveries to the site occur before the allowed time of 8 am. I have seen deliveries made from Dobson Close in many occasions.</p> <p>I can smell cooking odours in my flat coming from Deliveroo.</p> <p>I hate that they are on my doorstep and do not want them here anymore.</p>
2020/2367/P	Jacob Rosen	31/07/2020 11:34:10	OBJ	<p>My partner and me are objecting to this application. We walk each day between the tube station/shops and our flat and we regularly have to move out of the way of Deliveroo cyclists who are all over the pavement. They cut us up coming out/going in to the road leading to the Deliveroo site and they do not care they are doing it! The security guards do not seem to be able to monitor what these people are doing. There are a lot of them sitting on the wall near the site and gathering outside the cinema and outside the bank etc and they make the area look very untidy. We have also had to walk in the road a few times when deliveries are being made as the delivery van has been sticking out at the top of their road and blocking the pavement. This is dangerous as we have to walk in a bus lane. The security guards do not tell the drivers to move. Some Deliveroo cyclists travel the wrong way down Finchley Road against all the traffic just to take a shortcut to where they need to go! They are dangerous and should be made to follow the road round instead.</p> <p>We have lived in Swiss Cottage for six years and have noticed how the area has become more busy and more noisy because of the Deliveroo business being here. Having the cyclists and moped riders all over the area is not what Swiss Cottage is about. In our opinion the area has declined in appearance since Deliveroo opened. It was a much nicer place to live before they came and spoilt it :-)</p>

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I live in Dobson Close and should like to add my voice to those objecting to Deliveroo's application to remain at the Swiss Cottage site (115-119 Finchley Road).

Deliveroo Editions kitchens arrived on the site 3 years ago without consulting either the neighbours or the local council; this is not the behaviour of a company claiming to want to be a good neighbour. It is of course in keeping with the original stated aim of its holding company to be a 'disruptor' of normal business.

The arrival of Deliveroo Editions has certainly been disruptive because the site it is on is nestled into a residential area and the size of the operation – 9 kitchens – requires vast deliveries both in and out. From the start vans started coming into Dobson Close to carry out deliveries, similarly the riders whether on motor bikes or e-bikes have continued to use Dobson Close as access and to cut through from Belsize Road to Hilgrove Road. Dobson Close is a no-through private road and should only be used for access to those living in the close. How you may ask is it being used as a cut through by the delivery riders – pavements are mounted by the children's playground and the riders use a pedestrian footpath to and from Hilgrove Road! Residents have considered seeking bike bars on the path but this would make it impassable for residents with prams.

In addition to the undesirable and illegal traffic in Dobson Close, the operation of the kitchens and the methodology of allocating work to the riders has, from the start, encouraged riders to linger nearby to secure work. This has led to groups congregating at all points around the Deliveroo Editions kitchens including Dobson Close; the operation of the Deliveroo marshalls merely pushes it out of their sight line. Deliveroo has no answer to the problem because it is caused by the way Deliveroo allocates work to its riders.

Residents have supplied numerous examples of such behaviour to Deliveroo – excellently evidenced in Ms Edie Raff's submission. The very fact that the neighbours have had to put themselves to the trouble of documenting infractions is further proof of what a poor neighbour Deliveroo Editions is. If we had had the funds of Deliveroo to employ experts to document their activities 24 hours a day, rather than the occasional casual amateur photo taken by residents, the evidence against the suitability of having Deliveroo on this site would be overwhelming.

The most recent 'good neighbour' act by Deliveroo has been to increase its hours of operation. An action taken with no consultation that can only exacerbate the current problems experienced by its neighbours.

Deliveroo make much of the economic benefits they bring to the area. This is a company that as far as I can tell has never posted a profit but continue to trade by having investors keep pumping money into it, most recently Amazon. We are not therefore benefiting from any corporation tax as it makes no profits. Its commitment to its workforce is non-existent: just before the last appeal all the motorbike riders were dispensed with and replaced with cyclists and e-bike riders; complaints about the riders it engages are fended off by putting the blame on its 'self-employed' riders not adhering to what Deliveroo advises and occasionally sacking them; the benefits of working for Deliveroo – gig wages, no pension, no national insurance. And yet here is a company putting good restaurant businesses nearby with staff on a proper payroll out of business.

If Deliveroo wish to be a good neighbour they should follow the advice in Camden's Planning Guidance and

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2020/2367/P	M Sawicka	02/08/2020 09:35:18	OBJ	<p>use an industrial estate for its Editions kitchens. Now is the time to put a stop to Deliveroo wrecking the local resident's peaceful enjoyment of their homes – turn down this application for retrospective (says it all doesn't it) planning permission.</p> <hr/> <p>These people should not be in this area. The cyclists are nuisance and they are all over. They make area look untidy when they wait for job in street. I have to move out of way many time as cyclist on pavement and riding straight in to me.</p> <p>There are bad smells of oil and cooking from their kitchen. It is very unpleasant for us living here.</p> <p>Van's come into Dobson Close and deliver to them. The site is noisy as people in car park have cigarette and talk loudly. They are noisy all day and when leaving late in night.</p> <p>I do not want them to stay here. Living in Swiss Cottage was very nice before they came but not now.</p>

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2020/2367/P	Mark Hutchinson and Lis Fields	31/07/2020 13:17:23	OBJ	<p>We wish to object to Deliveroo's application in the strongest possible terms.</p> <p>At last year's Public Inquiry the Inspector gave Deliveroo, in effect, a year's trial to prove that they could manage to resolve the considerable problems caused by locating their business in an inappropriate site. This they have manifestly failed to do.</p> <p>Against the argument put forward by Deliveroo's lawyers, to the effect that their riders behaviour off-site was nothing to do with them, the Inspector made it absolutely clear that it was Deliveroo's duty to control the behaviour of their riders, so that they do not disrupt the local community. It is this that they have proved unable to do.</p> <p>Riders loitering in the local area waiting for orders:</p> <p>At the Public Inquiry Deliveroo's lawyers argued that there was no reason for riders to 'hang out' in the local area waiting for orders and that therefore it did not happen, despite the ample evidence to the contrary provided by the Local Residents Group.</p> <p>The Inspector agreed with the Local Residents Group and suggested that Marshals should stop riders loitering as they wait to be assigned orders. However, this continues to be a considerable problem. Whilst most Marshals do stop riders loitering at the entrance to the site, Deliveroo riders simply gather in spots slightly further away.</p> <p>Riders are consistently seen gathering in the following places before preceding to the Deliveroo site: on Belsize Road (down the steps to the west of Finchley Road); on Dobson Close; near the bus stop on Hilgrove Road; on Finchley Road (on the far side of the brick structure on the pavement opposite 131-137 Finchley Road); outside Overground House; on the steps of the entrance to Castleden House on Finchley Road; on the bench outside the Ye Olde Swiss Cottage pub (by the lights); on the far side of the Odeon cinema; and outside the library. These are the main places but individual riders can be seen loitering all over the the place within a radius around the site which enables them to reach it within minutes. Riders in all these places can be observed waiting for an order to be assigned to them on their phones and then riding to the Deliveroo site.</p> <p>The sheer quantity of riders are unsightly and intimidating to local residents in themselves. However, they also block pavements, monopolise benches and have even verbally abused residents trying to document their presence. All of which inhibits local residents from using and enjoying their local area and amenities, and has a detrimental effect on the quality of life of the community.</p> <p>It should also be noted that throughout the COVID-19 pandemic, usually there has been no social distancing between riders in these gangs and usually no face covering. Given the nature of their work, handling and dispersing packages of food throughout the borough, their reckless behaviour constitutes a grave health hazard. This is again due to the inappropriate nature of the Deliveroo site; if Deliveroo moved to a site where they could accommodate waiting riders within the site itself, without disturbing local residents, then appropriate health and safety measures (such as proper social distancing) could be monitored.</p>

Cycling on the pavement:

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It is both illegal and dangerous to cycle on the pavement, especially on a busy thoroughfare such as Finchley Road. However, the difficulty of getting to the entrance of the Deliveroo site means that many cyclists do just that. The cyclists tend to use the bus stop and telephone boxes to the north of the site on Finchley Road to shield them from being seen by the Marshal at the site entrance; they cycle up to this point before dismounting for the short walk to the site. Many cyclists cross Finchley Road from the lights to ride up to this point and many of these ride amongst pedestrians rather than using the dedicated route for cyclists. However, others cycle down from the north on the pavement of Finchley Road. We have also observed, on numerous occasions, cyclists riding right up to the site entrance on the pavement and being allowed to enter the site by the Marshall.

We should emphasise this is a major problem. At busy times there can be several cyclists every minute riding on the pavement; at less busy times it is still a regular occurrence.

Sometimes this problem is reversed: a cyclist will leave the site and push their bicycle until out of sight of the Marshal and then ride off on the pavement. On one occasion, an electric motorbike left the site and rode off on the pavement at speed.

The operating agreement resulting from the Public Inquiry explicitly banned cyclists leaving the site by turning right and cycling south on Finchley Road pavement. However, this still happens. On occasions when there is no Marshal present at the site entrance, which is not meant to happen but does, riders soon revert to using this route to head south. We have also observed it happening when a Marshal is present.

Cyclists often use other pavements, too. Particular problems are caused by cycling up Belsize Road (to the west of Finchley Road) on the pavement, in order to loiter, waiting for an order. This, incidentally, is not a route they should be using to access the site. Riders also frequently use the pedestrian walkways around the library. This is of particular concern as there are often children playing in these areas.

We have also observed riders turn from Finchley road onto Fairfax road, mount the pavement and cycle down it when the road was blocked by traffic, forcing startled pedestrians to step aside.

Cutting across Finchley Road:

At the Public Inquiry the Inspector said that riders exiting the site should turn left and that, if needing to cross Finchley Road, could use the dedicated cycle route next to the pedestrian lights. However, many riders exit the site and ride straight across five lanes of traffic, more or less at right angles to the traffic. Not only is this not what was intended by the directive to 'turn left' in the operational agreement but it is dangerous.

Not only this, but some riders enter the site from the pavement opposite the site by riding straight across five lanes of traffic, sometimes riding diagonally against the oncoming traffic. The Marshals seem unconcerned with such behaviour.

The use of Dobson Close and Belsize Road:

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The use of Dobson Close by cyclists and electric bikes is explicitly prohibited by the operating agreement. However, this happens frequently, every day. Since the Marshal at the entrance to the site should be able to see riders coming up the steps right next to the site entrance at the top of Dobson Close, riders now go via the steps at the top of Belsize Road. Riders going to and from the site use Dobson Close between Belsize Road and Hilgrove Road. This involves using the pedestrian walkway next to the childrens' playground. Nearly all riders going this way mount the pavement and ride down the walkway, expecting pedestrians to get out of their way. This not only breaks the operating agreement but is illegal and dangerous, especially as there are now a lot of children around, since the playground has reopened with the easing of the lockdown.

Dobson Close also has a 5 m.p.h. speed limit, which all Deliveroo riders ignore.

We have also witnessed orders being collected from the site on foot and then taken away in cars parked illegally in Dobson Close.

Riders are also not meant to enter or leave the site via the steps at the top of Belsize Road (west of Finchley Road). However, this is a route frequently used by riders (whether using Dobson Close or not). This is a pedestrian area and the frequent coming and going of cyclists, carrying their bikes up and down the stairs, obstructs and discomforts pedestrians. This problem is bad enough as it is; however, now that the tube station has re-opened and use of it increases, the conflict with pedestrians wishing to use these steps will increase enormously.

The sheer number of riders:

Many of the problems above are exacerbated by the sheer number of riders Deliveroo needs to use to fulfil its orders. The local area is swamped by hundreds of riders coming, going and loitering every day. This has an impact on the amenity of the local community in a way that a few take-aways from a local restaurant would not.

A particular problem is the number of cyclists pushing their bicycles along Finchley Road. Since many cyclists only dismount close to the site entrance, it is the pavement just north of the site entrance which is most crowded. This pavement is narrow and busy: there are a bus stop and two shops here. The constant traffic of cycles on the pavement obstructs and hinders pedestrians using the pavement.

However, the problem is not limited to this area. Mixed with cyclists riding on the pavement and others loitering, waiting for orders, the problem extends up and down Finchley Road. The narrow stretch of pavement at the top of the steps to Belsize Road is another particularly troublesome spot, with bicycles being carried up and down the steps, groups of riders and bicycles loitering to the north of the brick structure here, cyclists riding on the pavement and bicycles being pushed on the pavement.

Once again, the site is not in an appropriate location for the amount of traffic it generates and Deliver has proved incapable of controlling the behaviour of the cyclists it uses to collect its orders.

Limited effectiveness of Marshals:

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The local residents argued at the Public Inquiry that one Marshal at the site entrance could not possibly manage all the tasks assigned to him or her. This has proved to be correct. One Marshall is expected to stop riders using Dobson Close, stop riders loitering waiting for orders, monitor riders entering the site, monitor riders leaving the site, check that riders entering the site have a legitimate order, stop cyclists riding on the pavement and stop riders causing problems for pedestrians. As our evidence above documents, the extent of the Marshal's effectiveness seems limited to stopping loitering at the site entrance (sometimes) and monitoring the immediate comings and goings at the site entrance (sometimes). Marshals cannot be effective because the inappropriate nature of the site combined with the pressure put upon riders means that problems cannot be resolved but are simply pushed from one place to another.

Deliveroo are untrustworthy:

Prior to switching to cyclists and electric bikes Deliveroo had given local residents a cast-iron promise that under no circumstances whatsoever would riders be allowed to congregate outside the kitchens. However, they broke this promise. And despite claiming to want to be 'good neighbours' and work with the local community there was no consultation about breaking this promise. When challenged about this at the Public Inquiry, Deliveroo's barrister claimed there was no need to do this as Deliveroo were in the position to make the best decision for everyone.

Deliveroo did not tell local residents nor the Council of their plans to switch to cyclists and electric bikes, just prior to the Public Inquiry. It would seem that this was an attempt to subvert the preparation for the Inquiry by local residents and the Council. Regardless, it is another instance of Deliveroo acting without the slightest attempt at consultation.

These examples reveal Deliveroo's dismissive attitude towards residents' concerns and priorities. As the Council's representative made clear at the Public Inquiry, the Council has officers to help businesses such as Deliveroo to find a suitable site and, despite being aware of this service, Deliveroo failed to use it. They also did not consult the local community. When they were eventually forced to arrange meetings with the local residents they did so grudgingly and arranged the meetings at inconvenient times and advertised them poorly.

Conclusion:

In effect, nothing has changed since the situation before the Public Inquiry, after Deliveroo switched to using bicycles and electric vehicles. All of the problems which bedevilled the local community before, persist in various ways. Deliveroo has been unable to solve the problems it causes for local residents and the general public who use the area.

The persistence and extent of these problems show that they are caused by a combination of the specific nature of Deliveroo's business and the inappropriate nature of the site for such a business.

As regards the nature of the business, the manner in which riders are employed and paid puts an enormous amount of pressure on them: not only do they have to wait near enough to the site to have a chance of being

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allocated orders, they then have to deliver those orders as quickly as possible. This puts the riders in competition with each other and pressures them to behave recklessly in order to make a living.

Deliveroo have argued at community meetings and at the Public Inquiry that any problems are caused by the occasional misdemeanours of individual riders. However, this simply does not wash: the extent, persistence and wide-spread violation of the terms of the operating agreement happens all the time the site is open; this is testament to the fact that the problems are caused by the nature of the business and the inappropriate site and, moreover, that they are irresolvable.

The site is inappropriate for Deliveroo's business for two main reasons:

Firstly, it is located in a densely populated residential area. The immediate effect of this is that the noise of operating the kitchens, and the smells generated, disturb residents around the site. It also means that the site cannot accommodate riders waiting to collect orders without further disturbing local residents with more noise. Deliveroo initially provided facilities for riders but ceased doing so precisely for this reason. However, the knock-on effect is that waiting riders simply swamp the local area, loitering in unsuitable areas, where there are no facilities for them. In other words, the problem is simply spread out over a larger area. The sheer number of riders who need to wait nearby and descend quickly upon the Deliveroo site (because the site itself cannot accommodate them) cannot be accommodated safely and amicably in the local neighbourhood.

Secondly, the entrance to the site, in relation to the surrounding topology, creates insurmountable problems. Riders, under the pressures we have described, in order to earn a living, are forced to behave in all manner of unsafe ways getting to and from the site. The many places in which these transgressions take place cannot be seen by a Marshal situated at the site entrance and therefore cannot be controlled.

We do not object to Deliveroo as a business in principle nor to this site being used for an appropriate business. It is simply that Deliveroo is not an appropriate business for this site, as is proved by the relentless daily aggravation its presence causes for local residents and the general public.

Mark Hutchinson and Lis Fields
53 Dobson Close

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2020/2367/P	I McFarlane	31/07/2020 14:59:54	OBJ	<p>I live in Dobson Close. My kitchen window is opposite the chimneys that Deliveroo erected before they moved in. They are an absolute eyesore.</p> <p>Deliveroo should never have moved in to that site, it is completely the wrong place, in the middle of a residential area. There are lots of cooking smells wafting across from the site, some days more noticeable than others. I know from speaking to neighbours that Deliveroo have claimed these cooking odours are from people who live in Dobson Close and the surrounding flats but this is nonsense, they are coming from their kitchens.</p> <p>Don't get me started on the cyclists who are continually up and down and around the local area, riding on the pavements, gathering in groups in Dobson Close, other local roads, outside the Odeon, while they wait for an order to come through on their phones. They make the place look a complete mess. They are rude if told to get off their bike while on the pavement or to move out of the way of pedestrians. They are dangerous as they have no regard for going the wrong way on the road, riding on pavements, not moving out of the way, and believing they have right of way going out of and in to the Deliveroo site which causes pedestrians to have to stop in their tracks to allow them to pass. We were here first!</p> <p>I have seen delivery vehicles in Dobson Close many times. Deliveroo have acknowledged that some deliveries are happening this way. They should not be allowed to come into Dobson Close to make deliveries easier.</p> <p>The site is noisy and some staff are on site before 8 am. Most recently there was a delivery van which came on a Saturday morning and the driver had his radio on full blast. He left it on all the time he was away from the vehicle (nearly ten minutes). The noise was very intrusive and the guy did not care that he was in a residential area and should be more considerate of people. I saw him arguing with a Deliveroo member of staff when he was told to switch the radio off.</p> <p>I do not like Deliveroo being here on my doorstep and do not think the site they have chosen is good for Swiss Cottage and its inhabitants. I think the application should be refused because they came here without planning permission in the first place and they have made living here completely different (in a bad way) to what it was before.</p> <p>I am objecting to their application on the grounds of noise, odours and change to the local amenity.</p>

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2020/2367/P	Marcus Kranicz	31/07/2020 17:32:03	OBJ	<p>I have just found out from a neighbor that Deliveroo have made another planning application to stay on the site and I want to OBJECT to this.</p> <p>I live in Dobson Close and regularly see deliveries occurring to Deliveroo from the car park here in the early morning and during the day. They have disturbed me many times because the drivers leave the vehicles engine running or they make a noise when reversing in the car park. I understand such episodes have been reported and that Deliveroo have accepted these have happened. Deliveries direct to the site are happening before the site should be open and I hvae been disturbed by these a few times because of noisy vehicles or noisy drivers shouting to be let in through the gate.</p> <p>I have seen recently bicycles used by Deliveroo riders coming through Dobson Close to the Deliveroo site and back out down the bottom of Dobson Close next to the childrens playground. They ride up to the top and then walk with their bicycle up the steps to access the site next door. Therefore they are using Dobson Close as a short cut and they should not be doing this.</p> <p>There are bicycles and Deliveroo riders EVERYWHERE in Swiss Cottage. They ride on the pavement, get in the way of everyone, go the wrong way on local roads and I have also seen them congregating on street corners, near the bank, Cinema, local shops etc while they wait for a job. They make the area look very untidy.</p> <p>I regularly notice cooking smells when coming and going to my flat. Contrary to what I understand Deliveroo have claimed numerous times these are NOT being caused by me or my neighbors but are definately coming from their kitchen. The smells are awful especially in warm weather and they make me feel sick.</p> <p>The security people who are at the top of the Deliveroo road do not manage the riders or other visitors (deliveries etc) well. There are often riders and pedestrians in the same place at the same time as the riders come out or go into the site and it is always the pedestrians who have to give way to them. We should not have to look out for ourselves all the time when we are walking around because a rider might run into us. Deliveroo should NOT be in this location, their business is too busy with too much traffic coming and going all the time. They should be on an industrial site somewhere out of town and not force themselves on a residential area.</p> <p>I do not like them being next to where I live and feel they have had and will continue to have a detrimental effect on the local community.</p> <p>M Kranicz</p>
