

Sally Woodward
[REDACTED] Lauderdale Tower
Barbican [REDACTED]

19 April 2022

To City of London Licensing Authority

Re: Go Puff/Fancy Delivery UK Ltd licensing application for 171-176 Aldersgate Street Barbican dated 25 March 2022

I am Sally Woodward and I live at 223 Lauderdale Tower, Barbican, London EC2Y 8BY on the other side of the road from the subject premises.

I wish to make representations and to object to the granting of a licence in the terms sought by the applicant. I have read the letter of objection submitted by my husband Keith Woodward and endorse his objections based on both the legislation and the City's own Statement of Licensing Policy 2017 and in particular the following statements in the latter.

"In all cases, the granting of a licence will depend on the impact of an activity particularly on local residents."

"The City Corporation takes note of the nuisance and potential danger to pedestrians."

"Residents have a reasonable expectation that their sleep will not be unduly disturbed between the hours of 23:00 and 7:00."

"It is therefore the policy of the City Corporation to strike a fair balance between the benefits to a community of a licensed venue, and the risk of disturbance to local residents and workers."

It seems to me self-evident that this application – both in its nature and scale is completely inappropriate for the location – inside a residential building, opposite/nearby several residential blocks in the Barbican Estate, and moreover at a location at the junction of two arterial roads.

It is different in kind and scale from previous uses of the premises and from those nearby (including restaurants with usual on-licences only and during restricted hours).

The "Goods Entrance" and "Entrance/Exit" are immediately adjacent to a blind exit from a busy roundabout. It is not difficult to imagine the disturbance which would be caused by numbers of vehicles presenting at a hub for collection, or collection for onwards delivery. And if collections by customers are contemplated – where will they park or stop – will cyclists and pedestrians be forced into the main road? Not to mention the risk to all road-users from traffic exiting from a blind exit.

Experience shows that there is always potential for noise and disturbance from normal human interaction between those attending the premises in terms of loud conversation etc. Added to this is the prospect of noise and disturbance from vehicular traffic (including radios etc) generated by the proposed activity literally at all hours of the day and night.

All the above factors and a fair balance of between the benefits to the community of the activity and the risk of disturbance to local residents and workers suggest that the application should be refused on multiple grounds both according to the City's own Policy, but also on the basis of the main licensing objectives namely:

- Prevention of crime and disorder: the supposed availability of alcohol outside normal hours and its likely refusal to some can be expected to generate heated exchanges with disappointed customers.

- Prevention of public nuisance: noise, particularly late at night, from those attending the application site and their vehicles - will cause disturbance to local residents thereby infringing their right to respect for home and private life and quiet enjoyment of their possessions.
- Public safety: Aldersgate Street is a major north/south thoroughfare for vehicles and pedestrians with a busy roundabout next to the site making it unsuitable for collections and multiple deliveries.
- Protection of children from harm: presumably the Conditions attached to the application have been designed to prevent underage children from gaining access to alcohol. I am unaware of any evidence that they are sufficient and would expect the licensing authority to require that they be convinced on this issue.

Since these objections go beyond seeking to ensure that residents can get a good night's sleep (important as this is) I do not believe that they can be answered by a restriction in hours of operation and that any application for use of the site for the proposed activity of this nature and scale should therefore be refused. In what I hope is the unlikely event of all these factors being insufficient grounds for refusal - at the very least the proposed hours of operations should be very substantially restricted and appropriate conditions imposed to reduce inevitable risk and disturbance to other road users and pedestrians.

I also question whether the application should be challenged on the basis that proper procedure has not been followed – specifically no operating statement or other covering letter appears to have been supplied and nor has there been any consultation with local residents. Furthermore, for reasons set out above the so-called conditions proposed do not reflect the local environment nor take account of the precise location of the premises - they appear to be standard form.

Yours faithfully

Sally Woodward

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