

**From:**  
**Ian Burton, on behalf of the Lauderdale Tower House Group**

**To:**  
**City of London Corporation - Licensing Authority. By email to  
licensing@cityoflondon.gov.uk.**

**Date: 22 April 2022**

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

I am secretary of the Lauderdale Tower House Group ('LTHG'), the Recognised Tenants' Association for all long lessees of Lauderdale Tower. The western elevation of our residential tower abuts Aldersgate Street and the southern elevation also overlooks the street, and the flats on both these sides of the building are well within earshot of all noise and activity emanating from Aldersgate Street, south of the junction with Long Lane/Beech Street.

The Committee of LTHG wishes to make representations about, and to lodge an objection to, the granting of a licence in the terms sought by the applicant, as specified above.

Our objection is primarily on the basis that the proposed use manifestly contravenes the City's own Statement of Licensing Policy 2017 ('SLP') as well as being inconsistent with the other main Licensing Objectives.

We draw attention in particular to the following statements in the SLP:

- "In all cases, the granting of a licence will depend on the impact of an activity particularly on local residents."
- "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."
- "The City Corporation takes note of the nuisance and potential danger to pedestrians."

The proposed use of these premises by GoPuff/Fancy Delivery is fundamentally different both in nature and scale - especially the proposed 24/7 use - from any previous use(s) of these particular premises and the existing use of other nearby premises, which are mainly offices (where not residential flats). A little further afield, all restaurants and other related businesses in the vicinity have the usual on-licences only and only operate during restricted hours. This proposed use, i.e., warehousing and delivery operating all day and all night, on a street overlooked by hundreds of residential flats, is not appropriate and wholly prejudicial to the interests of residents trying to sleep. Premises immediately adjacent to so many residential homes (quite literally, right below some of the homes) and on the corner of a busy roundabout at the junction of various arterial routes seems a bizarre choice for a 24/7 warehousing/delivery operation.

The proposed "Goods Entrance" (and presumably the "Exit" too, although the Plan does not make this clear) is immediately adjacent to a blind exit from a busy roundabout and the "Riders' Entrance/Exit" is only a little further on – and next to the existing NCP car park entrance. The noise,

disturbance and risk to other road users which would be caused by a number of vehicles presenting at a hub for collection, or collection for onwards delivery, is obvious.

Furthermore, if collections by 'walk in' customers are contemplated (which we assume may be the case, but this is not clear), where will they park or stop without causing inconvenience or even danger to other road users, especially pedestrians?

There is always potential for noise and disturbance from the normal human interaction between those attending or working from such premises, and this is all the more so late in the evening after other venues are closed and residual traffic/pedestrian noise is reduced. Added to which is the prospect of noise and disturbance from delivery vehicular traffic (including radios, etc.?) generated by the proposed activity. It is proposed that all of this is happening, quite literally, at all hours of the day and night.

All the above factors, and the need to strike a fair balance between the benefits to the community of the proposed activity and the risk of disturbance to local residents, suggest that the application should be refused on multiple grounds, both according to the City's own SLP and on the basis of the main Licensing Objectives, namely:

- Prevention of public nuisance: noise, particularly late at night, from those attending the application site and their vehicles – it will cause considerable disturbance to local residents trying to sleep; and
- Public safety: Aldersgate Street is a major north/south thoroughfare for vehicles, cyclists and pedestrians with a busy roundabout next to the site making it unsuitable for collections and multiple deliveries, and presenting unnecessary risk to all road users, especially pedestrians and normal cyclists.

We note the proximity of some late-night services for both residents and visitors around Smithfield Market (some available 24/7 or at least 24/6) – but this is not a primarily residential area, and is driven by the presence of the historical meat market that necessarily works through the night. There is no justifiable need for more all-night premises in a neighbouring nearby area that is much less suitable because it is much more residential – and especially not in this particular location.

Since these objections go beyond seeking to ensure that residents get enough sleep (very important though that is), we submit that they cannot adequately be addressed by imposing a restriction on hours of operation and accordingly that any application for use of the site for the proposed activity of this nature and scale should therefore be refused.

In the unlikely event that all these factors are judged insufficient grounds for outright refusal, at the very least we would expect that the proposed hours of operations should be very substantially restricted and appropriate conditions imposed. This would be to reduce inevitable risk and disturbance to residents, as well as to other road users and pedestrians. Furthermore, for reasons set out above, the so-called conditions proposed in the application do not reflect the local environment nor take account of the precise location of the premises - they appear to be standard form.

We note that there has been no prior consultation with local residents, hence the lateness of this objection.

In conclusion, the LTHG urges you to reject this licensing application, i.e., a 24-hour warehousing and delivery operation in a unit immediately adjacent to the principal residential area in the City, as being wholly inappropriate in both kind and scale for its proposed location in Aldersgate Street.

Yours faithfully

**Ian Burton**

Secretary

for and on behalf of Lauderdale Tower House Group

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