

Keith Woodward  
XX Lauderdale Tower  
Barbican EC2Y 8BY

19 April 2022

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

I am Keith Woodward and I live at XX 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 understand that legitimate grounds for objection are circumscribed and I have had regard to the following factors: prevention of crime and disorder; prevention of public nuisance; public safety; protection of children from harm.

I have also been guided by the City of London Corporation Statement of Licensing Policy 2017 ("SoLP").

Assessing the relevance of these to the application has not been helped by the opaqueness of the application itself and the blandness of the Conditions which seem to have been copy/pasted without reference to the local context.

For instance, where will the on sales take place? If certain customers attend to collect an order (if that is what they are permitted/expected to do) where do they park?

This could have been avoided had there been early and detailed discussions with local residents which so far as I am aware have not taken place - certainly not with Lauderdale Tower residents who are, I would suggest, local.

Neither has any operating schedule or covering letter as apparently required by the SoLP been made generally available.

My representations in objection:

Relevant extracts from SoLP:

"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."

With these in mind:

The proposed activity is totally inappropriate to the locale .

It is different in kind from the previous activity on site - restaurant with the usual licence and that conducted at 55 Aldersgate Street particularly with regard to scale.

The "Goods Entrance" and "Entrance/Exit" are immediately adjacent to a blind exit from a busy roundabout. It is not clear whether any of the pavement or existing quasi cycle lane will come to be occupied by persons attending the application site thus forcing pedestrians into the road or cyclists out of the cycle lane.

The activity is to be located within what is otherwise a residential building and on the other side of the road from exclusively residential buildings.

Such proximity is recognised in the application itself with its reference to the address being Barbican.

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 delivery.

Experience shows that there is the 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 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 legitimate grounds:

Prevention of crime and disorder: the supposed availability of alcohol outside normal hours and its likely refusal 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 infringing their right to respect for home and private life and to the peaceful enjoyment of 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.

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 the objections go beyond seeking to ensure that residents can get a good night's sleep 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 should be refused.

Keith Woodward

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