

Gorillas Technologies, 113 Bryan Avenue, NW10 2AS

Resident Rep 1

24/03/21

I object on the grounds of public nuisance . Bryan Avenue is a quiet, residential street with a high density of families with children. The noise and traffic of delivery vehicles especially later at night will create noise nuisance for residents. If the license limited to earlier in the evening (8pm for example) that will fix much of the noise concern.

Resident Rep 2

24/03/21

The hours of operation are not suitable to a residential street. It will be a public nuisance and also given the children of Bryan Ave living near the warehouse there is an increased risk of harm.

Resident Rep 3

27-03-2021

1-Commercial /retail use of 113 Bryan Avenue NW10 will result in a public nuisance to the residents in the road. 2-The intended hours of commercial activity will mean additional vehicles and delivery bikes using the entirety of this quiet, residential road. This will mean additional risks to road safety for the residents and their young family members. 3- By the nature of the intended retail premises, there is a new risk of crime and disorder due to alcohol misuse in the road and surrounding area.

Resident Rep 4

28-03-2021

I have serious concerns about this application having young family, [REDACTED] the license address: - this is a residential, very quiet street. The hours –to midnight 7 days / week seems to completely disregard the residential nature of the neighbourhood. - The increased traffic flow – noise and light nuisance in evenings in particular –delivery drivers (even bike riders talk and make noise) and larger supply vehicles. - The risk of people drinking nearby – litter, noise, anti-social behaviour etc – if this is a place where people may also be pick up in person. Again, the residential nature of the neighbourhood seems to be ignored. - There are empty shops on the high road that may be more suitably located – ie in areas predominantly zoned commercial and where other delivery businesses are all based (Park Royal industrial estates come to mind)

Resident Rep 5

29-03-2021

Hello , My house is located [REDACTED] the warehouse . Under no circumstances I can imagine deliveries throughout WHOLE DAY - until midnight.. I have a small child and our street is quiet and safe . We won't be able to sleep (drivers off for deliveries/ drunk people wandering around my house) . My daughter will not be safe anymore on our lovely , family street .Big NO from me .

Resident Rep 6

30-03-2021

Dear Authority, Please find my opposing argument for permitting alcohol licence to Gorillas Technologies Ltd operating under 113 Bryan Avenue NW10 2AS One of the biggest issues for me is the everyday operation which is accommodated by long hours. This residential area which is identified as ADRC (Area of Distinctive Residential Character) cannot accommodate such practices. Architecturally the bedrooms on this road are facing the property in question which means the noise will be very prominent at night. This is a very quiet road, at night you can hear people walking past the window, I cannot imagine the noise pollution that would be produced if the operations were to happen so late (after quiet hours!) which is plain nuisance. This disturbs the

amity and harmony of this road aswell as the safety of my children, as I do not feel safe with people operating at such antisocial hour. Additionally, I do not feel that this road can accommodate a higher-level congestion. The distribution will require medium sized vans to participate in this operation, and as you can observe our cars are now at a higher risk of damage as its very tight which would create a disorder on the road. I have also had a frequent problem with people breaking into my van to steal tools as well as attempting to seal my catalyst converter from underneath the car. I strongly believe that the presence of this Wearhouse will only attract further criminals back to the area which this road has been trying to fight off for some time now. I am sure that there are several police reports on this case filed by myself aswell as my neighbours. Thank you for taking your time reading this I hope to deal with this case in an expedite way.

Resident Rep 7

30-03-2021

Bryan Avenue is entirely unsuitable for a business of this kind. It is a narrow residential street with many of the properties having bedrooms which face onto the street. Despite the use of electric bikes for deliveries, deliveries will be required at a business that will be open until midnight. Delivery drivers inevitably will be waiting outside which will disturb residents. The deliveries will cause an increase in traffic in this very quiet area .

Resident Rep 8

31-03-2021

I object to granting an alcohol license to the above premises on the following grounds. Bryan Avenue is a residential street, with most bedrooms facing the road. Extended hours from 8 am till midnight, and weekends will create traffic and noise, which will be a nuisance to the residents. In particular, lorries or vans for deliveries will contribute to noise and pollution. In addition, an alcohol license will create the possibility of consuming alcohol close to the premises, ie, in our street - albeit illegal, street alcohol consumption is wide spread nearby close to the library. Lastly, and most importantly, couriers coming and going throughout the extended hours will increase traffic problems and present a real and visible danger to public safety. The bottom part of Bryan Avenue has a bend and an incline, and vehicles passing each other always exercise additional care to avoid collision. At some point towards the bottom of the road, vehicles coming down do not see the rest of the street, and have to proceed slowly. Due to street parking on both sides, the space for pulling in towards the curb is limited. Cyclists milling around late at night and in hours of poor visibility will significantly increase the risk of a traffic accident. Therefore, it is very important that even if the license is granted, the hours of operation should be restricted to 9 am to 5 pm, weekdays only. Any outlet with extended hours and employing cyclists should be located in the high street where all other deliveries businesses are located, where traffic is more visible and better regulated.

Resident Rep 9

01-04-2021

we are concerned that such a business would affect us negatively. We believe public nuisance will increase, especially from 6pm to midnight, this is a quiet residential street. increased motorised veichles going up and down the road increasing the risk of harm for all of the residents, and possible large truck delivery weekly will cause congestion. happy to take a phone call to discuss.

Resident Rep 10

Dear Licensing Officer, Objection to Premises License application: The License application has been submitted by Gorillas Technologies Ltd concerning 113 Bryan Avenue, NW10 2AS ('warehouse') The warehouse location is in a quiet residential street and the granting of the licence will have a negative impact until midnight in terms of the traffic, noise, odours, litter, light and air pollution. The hours of business proposed as 8 am until midnight, seven days a week are too long and are not compatible with this residential location, an unreasonable balance of business and residential needs. The opening hours of this business would have a negative impact on the mental health and well being of residents. Public Safety & Protection of Children from harm: There will be deliveries and collections by trucks, lorries, vans, couriers, and bikes up to midnight seven days a week. When the warehouse was in use in the past 9 years, the hours of operation were 9 am–6 pm, Monday to Friday. During those years, the road has been blocked when deliveries are being unloaded. There is narrow yard space at the premises and when trucks reverse in then the pavement will be blocked. There is limited parking space on Bryan Avenue and any additional parking by employees/customers near 113 Bryan Avenue premises would exacerbate the situation. With parking on both sides of the street, there is a narrow turn-in at 113 Bryan Avenue. Also, there are two tight bends and a steep incline on Bryan Avenue that make pulling in for passing traffic difficult. Deliveries and couriers' activities will increase traffic with an increased risk of accidents, noise and harm to children. As this is an App/online delivery service it will significantly increase traffic on Bryan Avenue and there will be more noise nuisance and increased pollution. Public Nuisance: If the workers are gig-workers/self-employed there may be a lot of people waiting outside the warehouse or on the street for their order(s) to be ready – noise generated by the delivery drivers talking on their phones, talking to one another and playing music. The scooters and mopeds will cause noise disturbances to residents—especially at unsociable hours of the day when the ambient noise is reduced. There may be alcohol consumption on the street with increased littering and fouling.

Resident Rep 11

To Head of Service, Brent Council Regulatory Services. RE:-APPLICATION FOR A PREMISES LICENCE 113 BRYAN AVENUE NW10 2AS [REDACTED] resident of Bryan Avenue and oppose this application because of the significant adverse effects on the quality of life of residents in Bryan Avenue and the Dobree Estate. My objections are based on the following points, and refer to "Prevention of Public Nuisance": 1. Bryan Avenue is part of an ADRC (Area of Distinctive Residential Character). Apart from 113, all the buildings are residential. Most bedrooms in the houses face on to the street. It is therefore an entirely inappropriate location for a business involving numbers of delivery/courier vehicles with inevitable noise (and headlights after dark) from vehicles; the drivers/riders of those vehicles as they arrive/depart and inevitably converse outside the premises, especially in the evenings and weekends.

2. Granting a license will mean that there would be a significant amount of travel by couriers/delivery people, who may be travelling by car or motorcycle – while the applicants refer to bicycles and e-bikes, there is no specific exclusion of noisier and more dangerous forms of delivery mode of transport.

3. Granting a license will mean inevitable noise from couriers/delivery people gathering and conversing outside the premises. This, as well as the noise from delivery/courier vehicles will have more of an impact on local residents from such a business than if it were to be located in more appropriate premises, such as Willesden High Road, ie in areas predominantly zoned commercial and where other delivery businesses are all based.

4. The specific hours applied for mean that the premises will be closing up just after midnight, with inevitable noise after this time.

5. While I appreciate that this is a License Application rather than a specifically Planning issue, I must point out that 113 (previously Brent Council stores) has only been in operation as a warehouse from 8 am to 6 pm. It has not been regularly used on weekends (one short term tenant in the last 40 years did have some limited use on a Saturday morning), and certainly not on

Sundays or from 6pm to midnight in the week. This is my central point: arrival/departure of couriers/delivery riders or drivers in the hours after 6pm or at weekends will create additional noise and nuisance problems. 6. Therefore: if the licensing committee is minded to approve the licence, then there should be conditions that state there to be no activity or deliveries to or from the site between, say 6pm to 9am the following morning; not on Saturday afternoons from 1pm; and not at all on a Sunday. To do so otherwise would in effect mean a change of use for 113 Bryan Avenue. The amenity of local residents, who should not have to be disturbed by commercial activity of this type at these hours (evenings and weekends), would be drastically adversely affected if the license application as it stands were to be accepted.

Resident Rep 11 – additional

To Brent Council Business Licensing:

Dear Sir/Ms.,

I write with regard to the planning permission and business licensing implications for the licensing application for 113 Bryan Avenue NW10 2AS.

As a former local government officer, I am aware that licensing and planning are separate functions of Brent Council: nevertheless, in this case, if the application for a premises licence were to be granted in the terms requested there would be significant implications for planning and business licensing.

Please see point 5 (highlighted) in my objections to Regulatory Services.

My concern is that:

113 Bryan Avenue (formerly known as “The Stores”, as these premises were owned by LB Brent and used to store equipment such as wheelchairs) has never been used as commercial premises with hours of operation outside normal working hours (9 am to 5 pm) and certainly not on Sundays or up to midnight in the week. For Brent Council Regulatory Services to allow a license for hours beyond normal warehouse or similar commercial premises working hours would, in our view, constitute a change of use to planning regulations and require an application for planning permission accordingly. The building has B8 storage and distribution planning permission. However, it has previously only been used for storage (and distribution of a small number of items during the weekdays) and - most importantly - within warehouse/office hours, and certainly not until midnight or on Sundays. Please note also that the unit is more than 500m² so it will not come under permitted development and will need planning permission for what is in effect a change of use.

Please let me know your views on this as soon as possible.

Resident Rep 12

On the grounds of Prevention of Public nuisance. Prevention of crime and Disorder. [REDACTED]

[REDACTED] The impact of the proposal I feel would disrupt the characteristic features of the road as a residential area. The Willisden High Street from Walm Lane to Willesden Courts have many more suited premises. Bryan Avenue is part of an ADRC (Area of Distinctive Residential Character). Apart from 113, all the buildings are residential. Most bedrooms in the houses face on to the street. It is therefore an entirely inappropriate location for a business involving numbers of delivery/courier vehicles with inevitable noise (and headlights after dark) from vehicles; the drivers/riders of those vehicles as they arrive/depart and inevitably converse outside the premises, especially in the evenings and weekends.

Resident Rep 13

Bryan Avenue is a quiet, tree-lined residential location. There will need to be supply vehicles, delivery drivers and staff entering and exiting the premises. The light and noise nuisance that would be caused by licensing a premises for the hours suggested (e.g. voices, vehicles and doors, late at night in a very quiet area) is a significant concern. The proposal appears to completely disregard the residential nature of the neighbourhood and should not be approved. In addition to

likely nuisance, I also have safety concerns. The avenue is narrow, curved, and slopes up-hill. There are with cars parked on both sides. Effectively, the avenue is for one-way traffic. We have already had accidents on the road, people that were not locals / not residents driving too quickly. The last one was a delivery driver, after dark, on a moped bike in March 2021 and was near fatal. Any increased traffic flow should be discouraged at any hour, but in particular after dark when there is lower visibility. Personally, I commute by bicycle and have concerns for my personal safety with deliver drivers, supply trucks, staff cars etc. and our neighbours have young children and pets. Again any licence for the hours suggested should not be approved.

Resident Rep 14

RE: Application for a premises License 113 Bryan Avenue NW102AS [REDACTED] and I am writing to strongly oppose this application under several of the four licensing objectives. Bryan Avenue is a quiet residential area. Granting a license to enable an enterprise of this nature, which is entirely out of keeping with the area, will severely and detrimentally impact the lives, privacy, comfort and common rights of the residents of Bryan Avenue and the whole Dobree Estate. Bryan Avenue is an ADRC (Area of Distinctive Residential Character) with a Catholic Church and an Islamic College closeby. Nearly all residences on Bryan Avenue have bedrooms facing the street. There will be constant traffic, congestion and disruption caused by alcohol delivery vans and couriers coming and going. Couriers waiting around for alcohol orders will generate noise and litter and encourage antisocial behaviours such as public drinking and drug dealing / taking. Previous businesses using 113 Bryan Avenue have operated 8am to 6pm on weekdays and not on weekends, apart from one business that had some limited activity on Saturday mornings. The very long operating hours proposed, 8am to midnight 7 days a week will additionally exacerbate the noise and likely nuisances to be suffered by residents. Closing up activities, occurring after midnight 7 days a week, will cause further nuisance, noise and disruption. Increase in traffic, alcohol deliveries and loitering of couriers and others will result in increased risks / endangerment of resident children. Many children live in the area and children in a number of adjacent properties have bedrooms in close proximity to the warehouse. They will be unable to sleep or rest properly. Mothers and children travelling by foot to schools, kindergarten's etc. will be endangered by increased traffic, disrupted and negatively impacted. The presence of alcohol in large quantities on the premises will be attractive to criminals and result in increased burglaries and crime in the area. Overall granting this license would severely impact the quality and enjoyment of life of residents in their own homes. It will also severely and negatively impact property values resulting in financial loss and damage to all residents in Bryan Avenue and the Dobree Estate. Parking available for residents is already limited and this will make it impossible for residents to find parking in reasonable proximity to their own homes. Alcohol delivery vans and couriers will also result in increased risk of damage to the vehicles and property of residents. Commercial vehicles, particularly larger lorries are inappropriate for residential streets. There are any number of more suitable sites available locally for a licensed business, especially given the large number of failed businesses / empty commercial sites due to the pandemic etc. There are a number of light industrial estates locally with vacancies, Park Royal is not far away, the local High Roads, in serious need of revitalisation and rejuvenation have many vacant shops and premises. There are a number of closed and boarded up pubs locally etc.

Resident Rep 15

Dear Head of Service, Brent Council Regulatory Services and Licensing Committee, [REDACTED], I am writing to submit my strong opposition to the granting of the license for Gorillas Inc. for 113 Bryan Avenue on the grounds of prevention of public nuisance, public safety and protection of children from harm. Bryan Avenue is a very quiet residential street, several streets off the main commercial roads and does not even have a bus route along it unlike neighbouring Peter Avenue and Chambers Lane/Harlesdon Road. The structure of the housing coupled with the street's quiet nature means that almost all of the street has their bedrooms facing the street instead of the gardens. Whilst the warehouse in question is contemporaneous with the housing - the proposed usage, whilst still likely fitting just within planning, is novel and untested. The usage is very different from what the warehouse was intended for - long term storage of equipment from the old Willesden Hospital with only infrequent visits. It poses significant risks of public nuisance. The proposed hours of licensing, and hence operation, will not only exacerbate

these risks but be responsible for the bulk of them. * PUBLIC NUISANCE FROM EXTENDED HOURS OF OPERATION The proposed licensee states hours of operation from 8am to midnight every day. This would likely entail the premises being open for business from at least 7am to well past midnight every night with couriers and deliveries to and from the building at all licensed times, noisily locking up and opening, and deliveries to it outside of those times. This is unacceptable.

Whilst light industrial units are to be expected to cause some noise and nuisance - that nuisance must usually be limited to normal working hours in residential areas or moved to a more suitable location. In fact, it is notable that at least 2 other businesses have recently requested licenses from Brent for a similar use but they will be based out of industrial parks which are more suited to this kind of activity than a residential area. It is telling that the proposed licensee does not and has not considered this aspect of public nuisance in their proposed conditions. There is a growing understanding within licensing committees across the country that the duty of prevention of public nuisance from licensed premises does not only apply to nuisance from the eventual consumer of alcohol but to the complete business. Whilst this committee's own guidance in Policy 21 is rather terse on this matter, even Westminster Council has published guidance mostly relating to delivery from takeaways and restaurants

(<https://committees.westminster.gov.uk/documents/s23145/Delivery%20services.pdf>) which recognises that there is a serious public nuisance hazard from delivery and couriers, and the couriers themselves. * PUBLIC NUISANCE FROM COURIERS AND DELIVERIES FROM THE WAREHOUSE Gorillas suggests on its website that it would use e-bikes for its delivery from its warehouses but I note that this is not proposed as a condition for its license - no doubt because most alcohol deliveries from the warehouse are likely to require motorcycle couriers or even car couriers. The bulk of these deliveries from the premises are likely to happen outside of normal working hours, most likely after 10pm and thus cause substantial public nuisance. I also note on the proposed plan of the business there is no apparent staff room or courier resting area - which will mean spillover of couriers congregating outside of the warehouse causing public nuisance to the residents of Grange House and those opposite the warehouse. * PUBLIC NUISANCE FROM DELIVERIES TO THE WAREHOUSE The proposed license states no conditions on the times of delivery to the warehouse, again demonstrating that the licensee has not recognised that this is an entirely residential area. Gorillas have demonstrated a complete disregard for residents in their stocking up of an Islington premise with deliveries being made to that property from 5am (see <https://democracy.islington.gov.uk/documents/g3888/Public%20reports%20pack%2030th-Mar-2021%2018.30%20Licensing%20Sub%20Committee%20B.pdf?T=10> page 127). Their behaviour at these other sites suggests that they are not suitable licensees and will be terrible neighbours. * PROTECTION OF CHILDREN FROM HARM AND PUBLIC SAFETY It should be noted that Bryan Avenue due to its quiet nature is on the walking path for many schoolchildren who choose to use it to walk to and from school over Chambers Lane/Harlesden Road and the High Road. Having deliveries to the

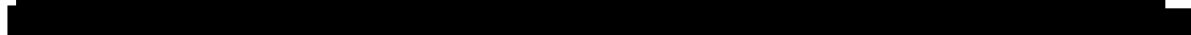
site before 9am and after 4pm risks considerable danger to the children living not only on this street but in the area. Motorised couriers will represent a considerable increase in road traffic and represent a danger to children and public safety. The road is narrow with parked residents cars along much of the way - congregating couriers, deliveries blocking the path and increased traffic will all force residents and children to walk along the road and face considerably increased danger. * NEARBY CUMULATIVE IMPACT ZONE Although Bryan Avenue does not technically fall within a cumulative impact zone, it is very close to the Willesden CIZ. Had anyone ever envisaged this warehouse being used in this manner, I have no doubt that it would have been included in the CIZ. There are substantial numbers of off-licenses in the environs - and we are not exactly starved for delivery services. * CONCLUSION I therefore strongly recommend that the licensing committee REJECT this application on the grounds of prevention of public nuisance and safety of children, however if the licensing committee is minded to approve the license they must impose at least the following conditions: * No deliveries to the site before 9am or after 6pm. This is a common condition that Brent imposes on its off-licenses and I can see absolutely no reason for this to not apply here. * The proposed hours of licensed operation are excessive and should be restricted to 11pm at the latest but given the siting on a residential street perhaps earlier. * The use of motorvehicle couriers must be restricted or banned entirely; certainly there should be no motorised (car or motorcycle) couriers before 9am, between 4pm and 6pm or after 9pm. * Bicycle and E-Bike (and motorcycle if they are permitted) couriers must carefully choose their routes - after 9pm they

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must leave Bryan Avenue by turning right on to Peter Avenue unless they are delivering further up Bryan Avenue or elsewhere on the Dobree estate. Bryan Avenue is not a main road and traffic should use roads which are designated for this use. * Couriers must be banned or otherwise discouraged from congregating outside of the warehouse either inside its boundaries or elsewhere. The grass outside of Grange House is not a public park or amenity. There must be no noise from the couriers after 9pm. Gorillas should commit to cleaning the environs of cigarette butts and other detritus. * The warehouse premises themselves have roller shutters, metal door and heavy metal gates. The roller shutters are very noisy - their use after 9pm must be banned. The gates and door are otherwise noisy - a specific condition must be applied to make Gorillas take action to silence the noise from these especially if licensed activity is to be allowed after 11pm. * The process of lock-up and opening-up must be silent. If the license is granted to midnight - lock-up of the premises is going to occur well after midnight. The manager involved must themselves abide by the conditions for couriers above. It would not be acceptable for the business to be otherwise silent until every night at 0030 when the manager locks up - slams the gates, gets into and starts their 3l Transit Van and races up the hill at 4000 RPM waking everyone up. This is a residential street - there should be no noise from any part of the business outside of normal working hours. Gorillas may complain that they would not suffer such conditions if they were not asking for a license - however as the Westminster City Council document suggests - conditions imposed under the licensing act 2003 on public nuisance need not be restricted to alcohol directly and it is unlikely that anyone would be ordering a jar of arrabiata sauce at quarter to midnight unless alcohol was also (likely already) involved. Yours Faithfully,

Resident Rep 16

 I feel the need to clarify my discomfort towards this incoming business. Here are some important points that I need to highlight: · For years Bryan Avenue has been a quiet and comfy residential area. The incoming enterprise will not only break with its tranquility, but not sooner or later this will bring a bad impact on its surroundings, transforming a residential area into a more commercial and crowded ubication. It is not a blame towards the opening of the enterprise, but for its content that will be for sale. · The alcohol industry can spoil the peace on its area, not for the single fact of selling drinks to customers but for the criminal acts that can bloom and therefore increase in the matter of days or weeks. · We must also consider that the drinking activity aims to create disturbing environments with litter and noise among many others. It is well known that this kind of business will attract people that suffer from alcohol addiction. This will affect the resident's privacy since clients can invade private gardens or front doors, facing directly from the resident's windows. Not only will it happen during the day but also at night due to the business opening hours. This will surely increase the amount of problems and reports to the police. · The area is strongly surrounded and inhabited by catholic and Islamic behaviors. The presence of alcohol on its premises will clearly create a huge discomfort and insecurity to its residentials, affecting all ages, from kids to elders. Parents will feel constantly insecure for their children's behavior since most of them go for themselves from their homes to their education center. · The traffic and parking slots will influence considerably, since clients and transporting vans for the enterprise's content will be arriving and departing daily. It is already tough to find parking slots for the proper residentials, so this arriving will not help at all. Most of the neighborhood is compounded by working residentials, so parking and traffic issues will not be greatly welcome. This kind of business is more likely to be seen in an industrial or commercial area. It would provide wider streets and better access for clients and providers and with no residential neighbours. However, placing this business in a residential area will create not only discomfort but a conflict with the neighborhood and its residentials.

Resident Rep 17

We write with our objection to the proposed Application for a Premises Licence for the warehouse, 113 Bryan Avenue, Willesden, London, NW10 2AS. Bryan Avenue is an extremely quiet residential road which is completely surrounded by residential roads on all sides. The road, Bryan Avenue is also very narrow with an extended bend in the road causing a blind spot. The planned hours of business (Gorillas Technologies) 08:00 to 00:00 Monday to Sunday is totally unacceptable to the

residents in Bryan Avenue where there are families with young children living literally next door, opposite and all along Bryan Avenue and the warehouse. The proposed hours of business will impose greatly on the residents of Bryan Avenue: i.e. Noise, Inconvenience, Parking and Health and Safety issues: The warehouse does not have sufficient capacity of room to receive and unload the delivery of goods within its premises. Logistically this will be challenging for the delivery drivers to find space within the premises of the warehouse, plus the use of a forklift vehicle; space will be very restrictive and unworkable. I would ask where would the holding bay be for delivery lorries/juggernauts to unload their goods. In reality vehicles will then have to park either on the roadside, or in the driveway of the warehouse causing pedestrians to step out into the road (this would be a health and safety issue especially parents with children). Or the delivery vehicles will have to park in the middle of the road, thus having a negative effect on the flow of traffic and/or residents trying to leave or return to their homes. In conjunction with the delivery vehicles, forklift vehicles will have to be used to unload the goods, which will further impact obstruction and the flow of traffic. Loss of parking spaces for residents (which has been paid for) Bin collections will be impeded causing delays to their work rounds Early morning/Late night and weekend working hours will impose noise disturbances greatly to the residents of Bryan Avenue: i.e. early/late deliveries, the use of a forklift vehicle(s) to unload goods. Employees, such as couriers hanging around the premises and surrounding location will cause noise disturbances to the residents. Even though the hours of business are excessive for a residential road (Bryan Avenue) when will the actual deliveries start and finish and when will employees finish? There is fear that the hours of noise and disturbances will be prolonged. Additional debris accumulating around the area: There are no public bins in our road, and it is only cleaned once a week, as it is a residential street. Health & Safety:: There is potential danger for residents, pedestrians, families with children to navigate around: Delivery vehicles Forklift vehicles E-bike riders Moped riders (with the possibility of future use) The manoeuvring of large vehicles and forklift vehicles along with e-bike riders shooting in and out of the premises with the future possibility of moped riders is a cause for concern. Road safety. Due to the nature of the street, cyclists or motorbike couriers milling around the area at times of poor visibility will increase the danger of traffic accidents. Just a few weeks ago a delivery rider was involved in a road traffic accident up the road in Bryan Avenue Combination of poor street lighting and employees hanging around late in the evenings would be intimidating for women coming home on their own. Plus extra noise disturbances from people hanging about. The above clearly shows that the proposed Premises Licence and use of the warehouse is totally out of place and is not fit for purpose in our residential road, Bryan Avenue. Bryan Avenue is known for its Area of Distinctive Residential Character (ADRC) and will become a conservation area in time. We as residents feel very strongly about the Character of our road and the use of the Warehouse in such a way is totally unreasonable and unacceptable to us the residents of Bryan Avenue. It would be more feasible for this enterprise (Gorillas Technologies) to operate from a trading estate or on a high street, where they can carry out their business which would be more beneficial to them without disturbing their neighbours, in this Bryan Avenue and its residents.

Resident Rep 17 – Additional Rep

14-04-21

I have already lodged an objection to the Licencing proposal for 113 Bryan Avenue. Furthermore, I am very concerned about the the public safety concerns and want to let you know that a near fatal traffic accident occurred on Bryan Avenue on the 8 March at 23:00 involving a food delivery scooter and a car. The accident was due to the narrow street with lots of parked cars and poor visibility on a bend in the road. It was an awful thing to have happened on the street and was very distressing. Having more traffic on Bryan Avenue will in my mind cause further accidents to occur, especially as courier riders tend to whizz about hurriedly to delivery their goods. Bryan Avenue is a very narrow road with a bend causing a blind spot where this accident took place. To add more traffic than normal will cause further incidents to occur. It will be further dangerous for pedestrians who happen to be walking past at any time day or night given the nature of courier whizzing in and out of the premises. Also large lorries delivering to the Warehouse will find it difficult to park up on the premises and parking in the driveway will also be dangerous for pedestrians. On another aspect of the proposed Licencing: I think that it will make it very easy for underage drinking as all they have to do is order alcohol on an app. Will the courier riders be vigilant or in deed would they have the time or interest to ensure no underage drinking is

occurring. Where does the proof of age come in?

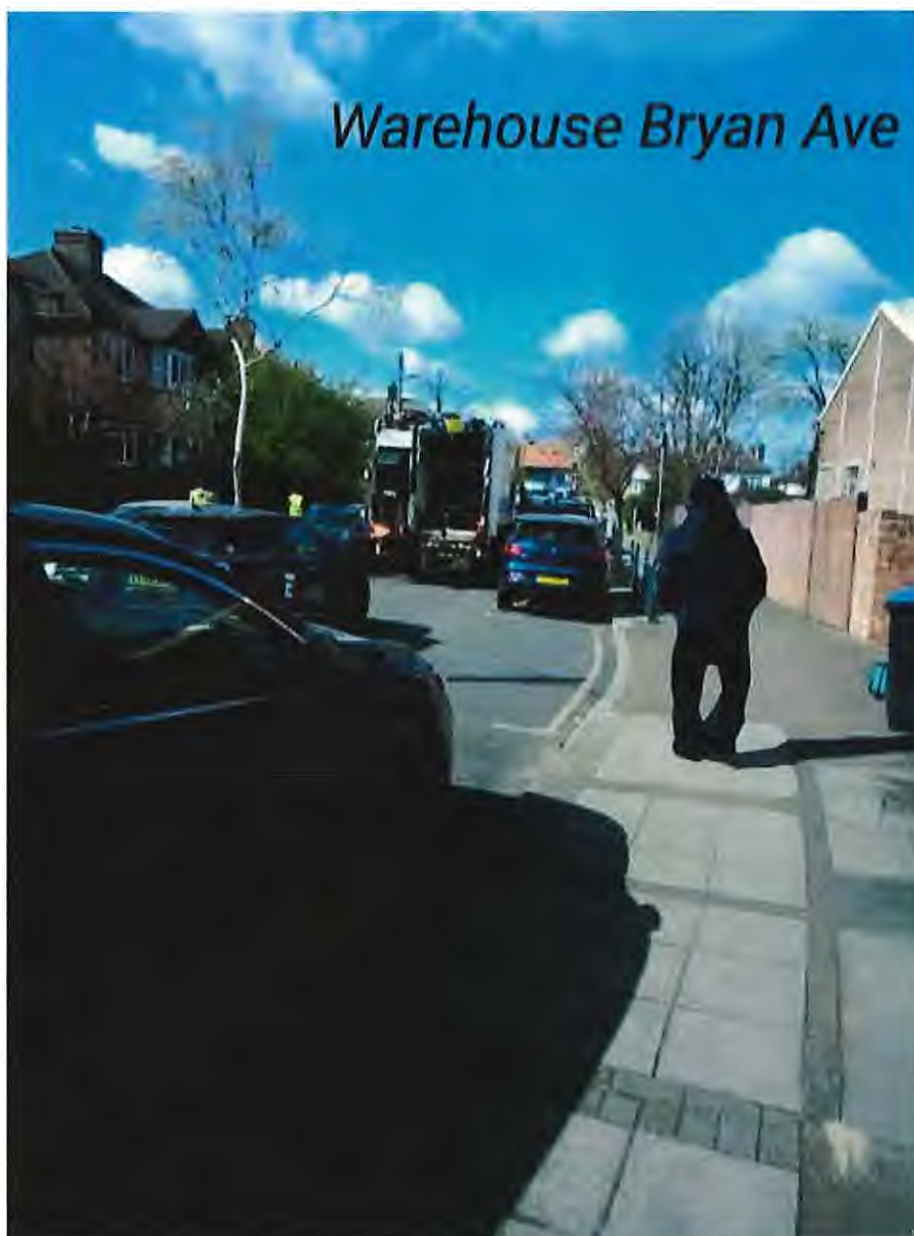
Resident Rep 17 Additional Rep 2

14-04-21

These photos illustrates how narrow and residential Bryan Avenue is. I tried to drive out of Bryan Avenue yesterday but a vehicle had blocked the road causing other cars to jam up outside the warehouse. If this was to occur daily it would be a public nuisance due to noise and pollution and a public safety concern due to the risk of an accident. Also there are no spaces for any of the delivery people to park when they are waiting for jobs, has this been taken into consideration at all? Already there is too much traffic using this small and narrow street. The Council had to put speed bumps in a few years ago but still there are accidents – such as the tragic one on March 8th which involved a food delivery scooter

Has a traffic management study been done to see what impact this proposed business would have in a highly residential area?





Resident Rep 18

To the Head of Service, Brent Council Regulatory Services and Licensing Committee, we ask you to listen to our concerns and take this opposition with seriousness. As long term residents of Bryan Avenue, we submit our strong opposition to the granting of the license for Gorillas Technologies Ltd for 113 Bryan Avenue on the grounds of Prevention of Public Nuisance, Public Safety and Protection of Children from Harm. This relates to the hours of operation, noise emanating from the premises, vibrations, lighting, litter, and delivery drivers coming and going 7 days a week from early morning to late at night. It is unacceptable to allow a company to disrupt the lives of dozens of families and professionals. Bryan Avenue is a quiet residential street, far from the main commercial roads and part of an ADRC (Area of Distinctive Residential Character). Apart from 113, all the buildings are residential. It is therefore an entirely inappropriate location for a business involving numbers of delivery/courier vehicles with inevitable noise (and headlights after dark) from vehicles; the drivers/riders of those vehicles as they arrive/depart and inevitably converse outside the premises, especially in the evenings and weekends. It poses significant risks of public nuisance. The structure of the housing and the street's quiet nature means that almost the entire street has their bedrooms facing the street instead of the gardens. Particularly, many children live in the area and have bedrooms in close proximity to the warehouse. They will be unable to sleep or

rest properly due to the increase in traffic, alcohol deliveries and loitering of couriers and others. The proposed hours of licensing, and operation, will not only exacerbate these risks but be responsible for the bulk of them. Our objections are detailed as follows: 1. The proposed licensee states hours of operation from 8am to midnight every day. This would likely entail the premises being open for business from at least 7am to well past midnight every night with couriers and deliveries to and from the building at all licensed times, noisily locking up and opening, and deliveries to it outside of those times. This is unacceptable. Whilst light industrial units are to be expected to cause some noise and nuisance - that nuisance must usually be limited to normal working hours in residential areas or moved to a more suitable location. It has to be pointed out that 113 Bryan Avenue has only been in operation as a warehouse from 8am to 6pm. It has not been used on weekends and certainly not on Sundays or from 6pm to midnight in the week. This is a central point: arrival/departure of couriers/delivery riders or drivers in the hours after 6pm or at weekends will create unacceptable additional noise and nuisance problems. There is a growing understanding within licensing committees across the country which recognises that there is a serious public nuisance hazard from delivery and couriering, and the couriers themselves. To this effect, we respectfully ask Brent Council Regulatory Services and Licensing Committee to consider the guidance published by Westminster Council mostly relating to delivery from takeaways and restaurants (<https://committees.westminster.gov.uk/documents/s23145/Delivery%20services.pdf>)

2. Nevertheless Gorillas suggests on its website the use of e-bikes for its delivery from its warehouses as to be noted that this is not proposed as a condition for its license; as matter of fact most alcohol deliveries from the warehouse are likely to require motorcycle couriering or even car couriering. The bulk of these deliveries from the premises are likely to happen outside of normal working hours, most likely after 10pm and thus cause substantial public nuisance. Also on the proposed plan of the business there is no apparent staff room or courier resting area - which will mean spill over of couriers congregating outside of the warehouse causing public nuisance particularly to the residents of the properties adjacent and opposite the warehouse. The proposed license states no conditions on the times of delivery to the warehouse, again demonstrating that the licensee has not recognised that this is an entirely residential area. Gorillas have already demonstrated a complete disregard for residents in their stocking up of an Islington premise with deliveries being made to that property from 5am. Their behavior at these other sites suggests that they are not suitable licensees and terrible neighbours. See <https://democracy.islington.gov.uk/documents/g3888/Public%20reports%20pack%2030th-Mar-2021%2018.30%20Licensing%20Sub%20Committee%20B.pdf?T=10> page 127. 3. Please note that Bryan Avenue is the residence of many families with school age children. Having deliveries to the site before 9am and after 4pm risks considerable danger to the children living on this street and in the area. Motorised couriers will represent a considerable increase in road traffic and represent a danger to children and public safety. The road is narrow with parked resident's cars along much of the way - congregating couriers, deliveries blocking the path and increased traffic will all force residents and children to walk along the road and face considerably increased danger. In addition to the above, the application of such license it raises a considerable concern about the necessity for Responsible Sales of Alcohol in our area. Customers of this operation will order their alcohol using a smartphone app, so the only staff who will be in a position to assess the suitability and appropriateness of customers will be the relatively low-level bicycle couriers employed by the business, many of whom appear to be around the same age group as the youngest customers of this business. This operation is only likely to increase and encourage the "preloading" at home of alcohol, especially among younger people who will have an anonymous means to obtain large quantities of strong alcoholic drinks at all hours of the day and night. There is an intrinsic difficulty in inspecting who and under what conditions the sale of alcohol is taking place, since the receipt of the alcohol-containing goods takes place remotely at the customer's premises, with only a young, low-level member of staff to act as responsible party for the transaction. In addition, the courier is likely paid for the delivery, so there is no incentive for them to refuse service of the goods and have to return them unpaid for to the premises. While these problems are concerning for all businesses delivering alcohol locally, we assume that large chains of supermarkets will have invested in measures to mitigate the negative impacts and risks involved. We are therefore fully concerned about the effects of underage and binge drinking at home which will be exacerbated by any incapacity or negligence by Gorillas in this regard. The last together with the other grounds for objection, will serve to express our objection to this development, which is welcomed by nobody

living on Bryan Avenue, threatens neighbouring family's right of full and peaceful enjoyment of their own home, disturbs the quiet on our street and it is completely inappropriate for its residential nature. Granting this licence can only introduce noisy goods and foot traffic at all hours of the morning and night, involve groups of people congregating under our bedroom windows, but more concerning than anything else will introduce a purely downside risk of underage and inappropriate drinking at home in the local area. This business is unnecessary in an area already full of ready sources of alcohol for collection and delivery, lacks any face-to-face vetting of customers by senior staff, is already proving a nuisance to local residents in the area of Islington where they are already operating. 4. The committee should also take in consideration the following points: a)The presence of alcohol in large quantities on the premises will be attractive to criminals and result in increased burglaries and crime in the area. b)Overall granting this license would severely impact the quality and enjoyment of life of residents in their own homes. It will also severely and negatively impact property values resulting in financial loss and damage to all residents in Bryan Avenue and the Dobree Estate. c)Parking available for residents is already limited and this will make it impossible for residents to find parking in reasonable proximity to their own homes. d)Alcohol delivery vans and couriers will also result in increased risk of damage to the vehicles and property of residents. Commercial vehicles, particularly larger lorries are inappropriate for residential streets. e)There is a large number of more suitable sites available locally for a licensed business, especially given the number of failed businesses / empty commercial sites due to the pandemic etc. There are a number of light industrial estates locally with vacancies, Park Royal is not far away, the local High Roads, in serious need of revitalisation and rejuvenation have many vacant shops and premises. There are a number of closed and boarded up pubs locally etc. 5. And last but no least, the council should consider that many properties located on Bryan Avenue have already been unfavourably affected by the granting of the licence for extended hours of operation to the Rising Sun Pub which is located just behind the warehouse on 113 Bryan Avenue. Since the granting of the said licence the pub has been a constant cause of nuisance for the residents of those adjacent properties; as a matter of fact, in many occasions the police had to be called because of fights happening between customers of the pub and in particular on the 5th December 2020 a fight between customers of the pub has escalated to a stabbing which the police is still investigating. We therefore ask that the Brent Council Regulatory Services and Licensing Committee MUST keep particularly in mind the residents of those properties located in the vicinity of the Pub and the Warehouse when giving thorough and careful consideration to the granting of the licence in question. Please treat this among the many other objections from us and other Bryan Avenue residents with the deep seriousness it plainly deserves, and consider these evident facts as grounds for refusing this application. CONCLUSION We therefore strongly recommend that the licensing committee REJECT this application on the grounds above mentioned, however if the licensing committee is minded to approve the license they must impose the explicit condition that the licence is for activities or deliveries to or from the site from 8am to 6pm Mon to Fri and Saturday from 8am to 1pm; and not at all on a Sunday. If the license application as it stands were to be accepted without imposing the above said condition, it would amount to a change of use for 113 Bryan Avenue and the amenity of local residents, who should not have to be disturbed by commercial activity of this type at these hours (evenings and weekends), would be drastically, adversely affected.

Resident Rep 19

05/04/21

Brent Council Regulatory Services -

We live in Peter Avenue near 113 Bryan Avenue.

We are opposed to the licence application from Gorillas Technologies Ltd for a premises licence for 113 Bryan Avenue on the grounds that:

- = It would increase traffic in the immediate area, which is residential, particularly in the evening.
- = Deliveries and collections would create noise disturbing to the residents through the day and into the evening.
- = It would create a risk of traffic accidents in Bryan Avenue with vehicles coming and going at the premises at night in what is a narrow street with parking on both sides near an uphill turn with poor visibility.
- = It would result in obstruction to pedestrian traffic in Bryan Avenue near the premises with couriers milling around while pickling up their consignments.

= It is unlikely that casual couriers would consistently observe conditions such limiting the route to be used going to and from the premises.

= It is unlikely that litter left by couriers would be cleared up promptly.

Best wishes,

Resident Rep 20

About Bryan Avenue, the local area and its residents and why I strongly oppose granting a license for Gorillas Inc. for 113 Bryan Avenue: [REDACTED] The Avenue is a very quiet and narrow residential street. It is home to many families with children and elderly residents. Due to the internal layouts most homes on the Avenue have street facing bedrooms. The Avenue sits within an ADRC (Area of Distinctive Residential Character). In the very immediate area is a large Catholic Church and an Islamic College. Considering the character of the local area and for the reasons outlined in my submission below, I strongly oppose granting a license for Gorillas Inc. for 113 Bryan Avenue. This outcome would negatively impact on the community living in the neighbourhood. Also, importantly, the proposed hours of operation (e.g., significantly after 5 pm and at weekends), changes the nature of the use of the premise and is totally different for what has previously been allowed. Change of Usage Significantly Differs From Original: Previous businesses using 113 Bryan Avenue have operated 8am to 6pm on weekdays and not on weekends, apart from one business that had some limited activity on Saturday mornings. Also, none of these businesses had any connection with alcohol. To accept this proposal would change the nature of usage which greatly differs to what has been allowed to date. Presumably the operating hours in use historically and up until now were implemented to respect that this is a residential area. Public Nuisance - Extended Operational Hours and Deliveries: The proposal is for operating hours from 8am to midnight seven days a week. In reality, the business would be opening and closing well outside these already anti-social hours in a residential area. The licence application does not specify what times deliveries can take place. So big delivery trucks could descend upon the street at any time. Public Nuisance – Operating Practices: The Gorillas website states it undertakes deliveries using e-bikes. But there is no licence condition for this operating practice. So, there is a real risk that more noisy and polluting forms of vehicles will be used. This is a major concern given that the demand for their services will come in the evening so accentuating the public nuisance. The business has not explained what toilet and rest room facilities will be provided for their workers. The local community must have assurances that these will be made available on-site to stop workers from using the surrounding public spaces for these activities. Public Safety Concerns – Traffic: Bryan Avenue is a very narrow street with resident parking along most of it. Plus, there is a slope and several blind spots. All these factors have resulted in numerous car scrapes and accidents over the years. The most recent took place at the start of 2021 and ironically involved a near fatal delivery bike crash. To increase the amount of traffic would be dangerous and physically there is no space for delivery vehicles/bikes to park safely. Parking available for residents is already limited and this proposal will make this even more constrained. If the hours of operation coincided with schools, there would be the additional risk to children walking to and from school. Has the Council conducted a traffic impact study to assess all these risks? Public Safety Concerns – Crime: The licence will mean that high value goods such as alcohol will be kept on site. This will increase the risk of burglaries. Public Safety Concerns – Litter, Rubbish, Pollution and Noise: The business will increase litter, rubbish, pollution and noise on Bryan Avenue and the local area. This is due to the vastly higher usage of the street by an activity that it is not designed for. At present, there are no public bins installed in the street to deal with this litter. The noise created by the business is the biggest concern, especially given the proposed hours. Better Local Options: In conclusion, the local area has several far more suitable sites for this licensed business. If this business was in a place zoned for light industrial or warehousing, all my objections would be redundant. BUT, as described, Bryan Avenue is a narrow street in a very quiet residential area. This proposal therefore would do significant and lasting damage to people's lives and so must be rejected. Yours Faithfully

Resident Rep 20 – Additional Rep

13-04-21

A near fatal traffic accident occurred on Bryan Avenue on the 8th march 2021 at 23.00The accident involved a food delivery scooter that due to the narrow street and a sharp bend hit a car

Given the nature of the injuries and the noise etc. the impact on the local residents was very upsetting. One of the residents went out to hold his hand to keep him alive until the ambulance arrived. We do not know if the driver passed away.

This type of incident is a real risk given the street layout, narrowness and the number of parked cars. This is a danger to both residents and road users and Bryan Avenue does not have the capacity for more traffic. Please can you ensure this evidence is presented to the committee I will arrange for photos of the street to be supplied shortly

Thanks for your help

Resident Rep 21

08-04-2021

This is a quiet residential area with a lot of families and this company would be disturbing the neighbourhood out of hours through the night and at weekend.

Resident Rep 22

08-04-2021

I object to the preposal on the grounds of public nuisance, public safety and protecting children from harm. The premises will be operational in an entirely residential area, apart from these premises and the working hours of delivery traffic and activity within and outside the building is from 8am until midnight 7 days a week 365 days a year, disturbing residents and increasing traffic and therefore risks to pedestrians esp. through hours of darkness, morning and evening, increased noise in the evenings disturbing residents, and increasing local pollution and damaging air quality. Children may have sleep disturbed an increase risk of road accident commuting to school and socialising on the street and health issues arising from increased pollution due to an increase of traffic for long hours and at weekends. This is all above the considerable health and safety concerns of adapting a light commercial space to a transport and delivery hub on a residential street. Totally unacceptable on these grounds.

Resident Rep 23

08-04-2021

Concerns of public nuisance and public safety. On the basis this is a residential area and having a commercial delivery warehouse seems dangerous as well as socially unfriendly due to the hours and 7 day operation. Finally, the stance this company has taken when doing this in other areas of London leads me to have concerns of the companies through and views of the local neighbourhood which they serve.

Resident Rep 24

08-04-2021

Concerns around noise, public safety as in a residential area with young children and elderly. Increased traffic especially large delivery vehicles on a very narrow highly populated road.

Resident Rep 25

08-04-2021

As owner and resident of [REDACTED], I am writing to submit my strong opposition to the granting of the license for Gorillas Technology Limited for 113 Bryan Avenue on the grounds of prevention of public nuisance, public safety and protection of children from harm. * PROTECTION OF CHILDREN FROM HARM AND PUBLIC SAFETY As a full-time working mother of [REDACTED], I am acutely aware of the dangers that my child and I will face as I attempt to put him in his car seat with e-scooters and (inevitable) motorvehicles racing up and down an already extremely

narrow road. As a [REDACTED] working within the tech hospitality sector, I am fully aware of the margins involved in businesses such as Gorillas. I am confident that in order to meet the 10 minute delivery promise the company will be forced to set targets that will require the drivers to set off and drive at speed from the start to the end of their route. Further, it should be noted that Bryan Avenue due to its quiet nature is on the walking path for many schoolchildren who choose to use it to walk to and from school over Chambers Lane/Harlesden Road and the High Road. Having deliveries to the site before 9am and after 4pm risks considerable danger to the children living not only on this street but in the area. Motorised couriers will represent a considerable increase in road traffic and represent a danger to children and public safety. The road is narrow with parked residents cars along much of the way - congregating couriers, deliveries blocking the path and increased traffic will all force residents and children to walk along the road and face considerably increased danger.

*** PUBLIC NUISANCE FROM EXTENDED HOURS OF OPERATION** Bryan Avenue is a very quiet residential street, several streets off the main commercial roads and does not even have a bus route along it unlike neighbouring Peter Avenue and Chambers Lane/Harlesden Road. Bryan Avenue is so narrow that opposing traffic must slow down and / or one vehicle must pull to the side of road to allow the other vehicle to pass. The narrowness of the road has been highlighted in recent years due to one of our neighbours requiring daily ambulance assistance rendering myself and immediate neighbours unable to turn our vehicles around and leave Bryan Avenue until the ambulance has departed. Motorised couriers will represent a considerable increase in road traffic and undoubtedly exacerbate such issues. The structure of the housing coupled with the street's quiet nature means that almost all of the street has their bedrooms facing the street instead of the gardens. Whilst the warehouse in question is contemporaneous with the housing - the proposed usage, whilst still likely fitting just within planning, is novel and untested. The usage is very different from what the warehouse was intended for - long term storage of equipment from the old Willesden Hospital with only infrequent visits. It poses significant risks of public nuisance. The proposed hours of licensing, and hence operation, will not only exacerbate these risks but be responsible for the bulk of them. The proposed licensee states hours of operation from 8am to midnight every day. This would likely entail the premises being open for business from at least 7am to well past midnight every night with couriers and deliveries to and from the building at all licensed times, noisily locking up and opening, and deliveries to it outside of those times. This is unacceptable. Whilst light industrial units are to be expected to cause some noise and nuisance - that nuisance must usually be limited to normal working hours in residential areas or moved to a more suitable location. In fact, it is notable that at least 2 other businesses have recently requested licenses from Brent for a similar use but they will be based out of industrial parks which are more suited to this kind of activity than a residential area. It is telling that the proposed licensee does not and has not considered this aspect of public nuisance in their proposed conditions. There is a growing understanding within licensing committees across the country that the duty of prevention of public nuisance from licensed premises does not only apply to nuisance from the eventual consumer of alcohol but to the complete business. Whilst this committee's own guidance in Policy 21 is rather terse on this matter, even Westminster Council has published guidance mostly relating to delivery from takeaways and restaurants(<https://committees.westminster.gov.uk/documents/s23145/Delivery%20services.pdf>) which recognises that there is a serious public nuisance hazard from delivery and couriering, and the couriers themselves.

*** PUBLIC NUISANCE FROM COURIERS AND DELIVERIES FROM THE WAREHOUSE** Gorillas suggests on its website that it would use e-bikes for its delivery from its warehouses but I note that this is not proposed as a condition for its license - no doubt because most alcohol deliveries from the warehouse are likely to require motorcycle couriering or even car couriering. The bulk of these deliveries from the premises are likely to happen outside of normal working hours, most likely after 10pm and thus cause substantial public nuisance. I also note on the proposed plan of the business there is no apparent staff room or courier resting area - which will mean spillover of couriers congregating outside of the warehouse causing public nuisance to the residents of Grange House and those opposite the warehouse.

*** PUBLIC NUISANCE FROM DELIVERIES TO THE WAREHOUSE** The proposed license states no conditions on the times of delivery to the warehouse, again demonstrating that the licensee has not recognised that this is an entirely residential area. Gorillas have demonstrated a complete disregard for residents in their stocking up of an Islington premise with deliveries being made to that property from 5am (see <https://democracy.islington.gov.uk/documents/g3888/Public%20reports%20pack%2030th-Mar->

2021%2018.30%20Licensing%20Sub%20Committee%20B.pdf?T=10 page 127). Their behaviour at these other sites suggests that they are not suitable licensees and will be terrible neighbours. * NEARBY CUMULATIVE IMPACT ZONE Although Bryan Avenue does not technically fall within a cumulative impact zone, it is very close to the Willesden CIZ. Had anyone ever envisaged this warehouse being used in this manner, I have no doubt that it would have been included in the CIZ. There are substantial numbers of off-licenses in the environs - and we are not exactly starved for delivery services. * CONCLUSION I therefore strongly recommend that the licensing committee REJECT this application on the grounds of prevention of public nuisance and safety of children, however if the licensing committee is minded to approve the license they must impose at least the following conditions: * No deliveries to the site before 9am or after 6pm. This is a common condition that Brent imposes on its off-licenses and I can see absolutely no reason for this to not apply here. *

The proposed hours of licensed operation are excessive and should be restricted to 11pm at the latest but given the siting on a residential street perhaps earlier. * The use of motorvehicle couriers must be restricted or banned entirely; certainly there should be no motorised (car or motorcycle) couriers before 9am, between 4pm and 6pm or after 9pm. * Bicycle and E-Bike (and motorcycle if they are permitted) couriers must carefully choose their routes - after 9pm they must leave Bryan Avenue by turning right on to Peter Avenue unless they are delivering further up Bryan Avenue or elsewhere on the Dobree estate. Bryan Avenue is not a main road and traffic should use roads which are designated for this use. * Couriers must be banned or otherwise discouraged from congregating outside of the warehouse either inside its boundaries or elsewhere. The grass outside of Grange House is not a public park or amenity. There must be no noise from the couriers after 9pm. Gorillas should commit to cleaning the environs of cigarette butts and other detritus. * The warehouse premises themselves have roller shutters, metal door and heavy metal gates. The roller shutters are very noisy - their use after 9pm must be banned. The gates and door are otherwise noisy - a specific condition must be applied to make Gorillas take action to silence the noise from these especially if licensed activity is to be allowed after 11pm. * The process of lock-up and opening-up must be silent. If the license is granted to midnight - lock-up of the premises is going to occur well after midnight. The manager involved must themselves abide by the conditions for couriers above. It would not be acceptable for the business to be otherwise silent until every night at 0030 when the manager locks up - slams the gates, gets into and starts their 3l Transit Van and races up the hill at 4000 RPM waking everyone up. This is a residential street - there should be no noise from any part of the business outside of normal working hours. Gorillas may complain that they would not suffer such conditions if they were not asking for a license - however as the Westminster City Council document suggests - conditions imposed under the licensing act 2003 on public nuisance need not be restricted to alcohol directly and it is unlikely that anyone would be ordering a jar of arrabbiata sauce at quarter to midnight unless alcohol was also (likely already) involved.

Resident Rep 26

08-04-21

Opposed to noise pollution from mopeds.. highly residential area and concern of safety re mopeds and delivery vehicles with young kids present.

Resident Rep 27

11-04-21

Dear Head of Service, Brent Council Regulatory Services and Licensing Committee, As residents of Bryan Avenue, we are writing to submit strong opposition to the granting of the license for Gorillas Inc. for 113 Bryan Avenue on the grounds of prevention of public nuisance, public safety and protection of children from harm. Bryan Avenue is a very quiet residential street, located several streets off the main commercial road (Willesden High Road) and with no bus route, unlike neighbouring Peter Avenue, Chambers Lane and Harlesden Road. The structure of the housing coupled with the street's quiet nature means that almost all the properties in the street have their bedrooms facing the street instead of the gardens. Whilst the warehouse in question is contemporaneous with the housing, the proposed usage as a dark supermarket, whilst possibly just inline within current planning, is novel and untested. The usage is very different from what the

warehouse was originally intended for: long term storage of equipment from the old Willesden Hospital with only infrequent visits. This new usage poses significant risks of public nuisance and the proposed hours of licensing and operation will not only exacerbate these risks but will be responsible for the bulk of them. • PUBLIC NUISANCE FROM EXTENDED HOURS OF OPERATION The proposed licensee states hours of operation from 8am to midnight every day. This would likely entail the premises being open prior and after these hours for business for deliveries, locking up etc. In a residential street, this is simply unacceptable. Whilst light industrial units are to be expected to cause some noise and nuisance, this must usually be limited to normal working hours in residential areas otherwise these units should be moved to a more suitable location. Neither does the applicant appear to have considered this aspect of public nuisance in their proposed conditions or has they supplied risk assessment. This is encouraged by Policy 5 of Brent's Statement of Licensing Policy, including nuisance caused by the potential of noise. The applicant has not proposed any measures to reduce public nuisance from the extended hours of operation in-line with the same Policy. Considering the residential location of 113 Bryan Avenue and hours of operation, the Committee should look to impose stringent conditions within the license on the applicant. We would also like to highlight that at least one other business (Weezy Group Limited) has recently requested a licence from Brent for similar use and activity (Application no. 20880) but it is located in an industrial park, more suited for this activity. We believe it is pertinent to note that Gorillas Inc. have also requested licences from Lambeth Council for their South London operations within industrial park locations, rather than light industrial units within residential areas. There is a growing understanding within licensing committees in London that the duty of prevention of public nuisance from licensed premises does not only apply to nuisance from the eventual consumer of alcohol but to the complete business. Whilst this committee's own guidance in Policy 21 is rather light on the licensable activities of dark supermarkets – given that this is an emerging technological retail trade - Westminster Council has published guidance, mostly relating to delivery from takeaways and restaurants, which recognises that there is a serious public nuisance hazard from delivery and couriership involving increased traffic, noise, litter and public urination which we implore the Committee to consider. This guidance is available here: <https://committees.westminster.gov.uk/documents/s23145/Delivery%20services.pdf>. • PUBLIC NUISANCE FROM COURIERS AND DELIVERIES FROM THE WAREHOUSE Both press articles and Gorillas own website highlight the use of e-bikes for its delivery from its warehouses to consumer, but we understand that this is not proposed as a condition for its license - no doubt because the weight and bulk of alcohol deliveries from the warehouse are likely to require moped/motorcycle couriership or even car couriership. The bulk of these deliveries from the premises are likely to happen outside of normal working hours and as such would cause substantial public nuisance for residents.

We note on the proposed plan of the business there is no apparent staff room, courier resting area, goods pickup stations or e-bike/transport parking. This will likely mean an overflow of couriers and their transport into the road, causing public nuisance to the residents of Bryan Avenue, Grange House and others within the Dobree Estate. It is evident that the applicant has not taken the "reasonable steps to prevent the occurrence of public nuisance immediately outside their premises" and have not "considered the impact [of warehouse staff or couriers] congregating around entry points to their premises" in-line with Policy 20 on the residents of Bryan Avenue and the wider area. • PUBLIC NUISANCE FROM DELIVERIES TO THE WAREHOUSE The proposed license states no conditions on the times of delivery to the warehouse, again demonstrating that the licensee has not recognised that this is an entirely residential area. Given the nature of Gorillas grocery business, we believe the Committee should be made aware of the restrictions on delivery times that the largest supermarket in Willesden – Sainsbury's on Willesden High Road – must abide by to reduce public nuisance to nearby residents. The Committee should also note that delivery access to Sainsbury's Willesden High Road solely intended for articulated/goods vehicles whilst Bryan Avenue is a narrow street with a gradient and resident parking along both sides – making it unsuitable for large grocery deliveries. Unfortunately, the make-up of Bryan Avenue has resulted in traffic accidents over the years with the most recent at the start of 2021 with a near fatal courier moped accident. Gorillas have also already demonstrated complete disregard for residents and the public nuisance generated from delivery noise in their short time of operating in London, which is highlighted by deliveries being made to an Islington location from as early as 5am (see <https://democracy.islington.gov.uk/documents/g3888/Public%20reports%20pack%2030th-Mar->

2021%2018.30%20Licensing%20Sub%20Committee%20B.pdf?T=10 and reported here: <https://www.islingtongazette.co.uk/news/business/neighbours-hit-by-gorillas-noise-in-angel-7876198>). Their behaviour suggests that they are not suitable licensees and will not be good neighbours. This is further reflected in their current refurbishment of the property and determination to commence operations without speaking to or developing a relationship with the residents of Bryan Avenue and the surrounding streets. • PROTECTION OF CHILDREN FROM HARM AND PUBLIC SAFETY Due to the quiet nature of Bryan Avenue many parents and their schoolchildren choose to use it to walk to and from both nurseries, pre-schools and schools around the local area.

The general public also use Bryan Avenue to walk to and from their day-to-day activities. Having deliveries to and from the site prior to 9am and after 3pm exponentially increases the risk of a traffic incident involving a child not only on this street but in the wider Dobree Estate. As long-term residents of the Dobree Estate, and now parents to a young child, we still remember the death of a two-year old in 2007 on Donnington Road, close by to Bryan Avenue, after being struck by a vehicle.

Gorillas couriers, including those on e-bikes, will considerably increase road traffic and given the pressure to deliver produce within the companies 10-minute timeframe represent a danger to children and the public who choose to walk along Bryan Avenue, going against Objective 3 ("Improve the perceived and actual safety and security of pedestrians") of Brent's Walking Strategy 2017 -2022.

CONCLUSION We therefore strongly recommend that the licensing committee REJECT this application on the grounds of prevention of public nuisance and safety of children. However, if the licensing committee is minded to approve the license, they must impose at least the following conditions in the best interest of the current residents of Bryan Avenue: • A restriction on hours when deliveries can be made to the site – especially no deliveries in the morning before 9am or after 6pm during weekdays, with no additional deliveries on weekends. Reduced delivery hours are a common condition that Brent imposes not just on large supermarkets, but also on smaller premises such as off-licenses, and we can see absolutely no reason for this to not apply here. • No deliveries of goods to the site by Ordinary Goods Vehicle Class 2 with four or more axles and all articulated vehicles. As a narrow residential road, the prospect of harm to the public, property damage and associated traffic disruption must be removed prior to the licensee undertaking operations. • Any unloading of goods must occur within the grounds of the property to reduce the risk of harm to the public and property damage in-line with the above point. • The proposed hours of licensed operation are excessive and should be curtailed to a more appropriate time given the site is located on a residential street. • The use of motor vehicle couriers must be restricted or banned entirely.

Certainly, there should be no motorised (car or motorcycle) couriers before 9am, between 4pm and 6pm or after 9pm and couriers may not be permitted to use Bryan Avenue or the surrounding Dobree Estate to wait for orders/pick-ups. • Bicycle and E-Bike (and motorcycle if they are permitted) couriers must carefully choose their routes and should turn right onto Bryan Avenue and then onto Peter Avenue. Bryan Avenue is not a main road and traffic should use roads which are more designed for this use. • Couriers must be banned or otherwise discouraged from congregating outside of the warehouse. For example, the grass outside of Grange House which backs onto Bryan Avenue is not a public park or amenity. • There must be no noise from the couriers after 9pm. Gorillas should commit to cleaning the environs of cigarette butts and other detritus that arise from their operations. • The warehouse premises themselves have roller shutters, metal door and heavy metal gates. A specific condition must be applied to make Gorillas take action to silence the noise especially if licensed activity is to be allowed into the evening. • The process of lock-up and opening up must be silent. If the license is granted to midnight - lock-up of the premises is going to occur well after midnight. The manager involved must themselves abide by the conditions for couriers above.

We understand Gorillas may complain that this objection is a form of nimbysim and that we are looking to stop any usage of the property. That cannot be further from the case. During the COVID-19 pandemic, we -like many others- have relied heavily on grocery delivery services and understand why this is an expanding and heavily contested market. However, Gorilla's choice of location within a residential area rather than an industrial estate should be seriously reviewed by the Licensing Committee given the underlining threat of the increase in public nuisance not just to

the residents of Bryan Avenue, but across the Dobree Estate. As the Westminster City Council documentation suggests, imposing conditions under the Licensing Act 2003 to avoid public nuisance need not be restricted to just the sale of alcohol directly. We would also welcome the Committee to visit the site, Bryan Avenue and the wider Dobree Estate to fully understand why these objections have been raised.

Resident Rep 27 – Additional Rep

Sent: 13 April 2021 10:19

To: Business Licence <business.licence@brent.gov.uk>

Subject: Re: New Premises Licence - 113 Bryan Avenue, London, NW10 2AS - 20885

Thank you for confirming that we can submit further details to our objection via this e-mail. We originally sent our objection via the Brent website on Sunday 11th April in regards to a new premises licence for Gorillas Inc. located at 113 Bryan Avenue.

I think it is pertinent for the Licensing Committee to be made aware of the recent decision by Islington council to impose conditions on the operations of Getir UK Ltd. within a industrial unit in a residential area - a similar 'dark supermarket' service that Gorillas will be operating - following representations from concerned residents. This highlights-and sets a precedent- that conditions under the Licensing Act 2003 not just have to take into consideration the sale of alcohol directly, but the wider impact on residents within close proximity where there 'dark supermarket' services operate.

The conditions applied by Islington Council on Getir UK Ltd. can be found in Appendix 3 here: <https://democracy.islington.gov.uk/documents/s24008/Getir%20UK%20Ltd%20%20Bakers%20Row.pdf> with additional details from the minutes of Meeting of Licensing Sub Committee D from 23rd February 2021

here: <https://democracy.islington.gov.uk/mgAi.aspx?ID=25113>

At a headline these conditions include restricting deliveries to the unit between Mon - Fri (9am to 5pm) which can only take place within the site (and not from the street); no deliveries to consumers from the site by car/motorbike/moped; drivers have to wait inside the unit for deliveries, as well as many others which I will allow you to review in conjunction with the objections from other residents.

Thank you for your time.

Resident Rep 28

11-04-21

About Bryan Avenue, the local area and its residents and why I strongly oppose granting a license for Gorillas Inc. for 113 Bryan Avenue: I have lived in Bryan Avenue since 2003. The Avenue is a very quiet and narrow residential street. It is home to many families with children and elderly residents. Due to the internal layouts most homes on the Avenue have street facing bedrooms. The Avenue sits within an ADRC (Area of Distinctive Residential Character). In the very immediate area is a large

Catholic Church and an Islamic College. Considering the character of the local area and for the reasons outlined in my submission below, I strongly oppose granting a license for Gorillas Inc. for 113 Bryan Avenue. This outcome would negatively impact on the community living in the neighbourhood. Also, importantly, the proposed hours of operation (e.g., significantly after 5 pm and at weekends), changes the nature of the use of the premise and is totally different from what has previously been allowed. Change of Usage Significantly Differs From Original: Previous businesses using 113 Bryan Avenue have operated 8am to 6pm on weekdays and not on weekends, apart from one business that had some limited activity on Saturday mornings. Also, none of these businesses had any connection with alcohol. To accept this proposal would change the nature of usage which greatly differs to what has been allowed to date. Presumably the operating hours in use historically and up until now were implemented to respect that this is a residential area. Public Nuisance - Extended Operational Hours and Deliveries: The proposal is for operating hours from 8am to midnight seven days a week. In reality, the business would be opening and closing well outside these already anti-social hours in a residential area. The licence application does not specify what times deliveries can take place. So big delivery trucks could descend upon the street at any time.

Public Nuisance – Operating Practices: The Gorillas website states it undertakes deliveries using ebikes. But there is no licence condition for this operating practice. So, there is a real risk that more noisy and polluting forms of vehicles will be used. This is a major concern given that the demand for their services will come in the evening so accentuating the public nuisance. The business has not explained what toilet and restroom facilities will be provided for their workers. The local community must have assurances that these will be made available on-site to stop workers from using the surrounding public spaces for these activities. Public Safety Concerns – Traffic: Bryan Avenue is a very narrow street with resident parking along most of it. Plus, there is a slope and several blind spots. All these factors have resulted in numerous car scrapes and accidents over the years. The most recent took place at the start of 2021 and ironically involved a near fatal delivery bike crash. To increase the amount of traffic would be dangerous and physically there is no space for delivery vehicles/bikes to park safely. Parking available for residents is already limited and this proposal will make this even more constrained. If the hours of operation coincided with schools, there would be the additional risk to children walking to and from school. Public Safety Concerns – Crime: The licence will mean that high value goods such as alcohol will be kept on site. This will increase the risk of burglaries. Public Safety Concerns – Litter, Rubbish, Pollution and Noise: The business will increase litter, rubbish, pollution and noise on Bryan Avenue and the local area. This is due to the vastly higher usage of the street by an activity that it is not designed for. At present, there are no public bins installed in the street to deal with this litter. The noise created by the business is the biggest concern, especially given the proposed hours. Better Local Options: In conclusion, the local area has several far more suitable sites for this licensed business. If this business was in a place zoned for light industrial or warehousing, all my objections would be redundant. But, as described, Bryan Avenue is a narrow street in a very quiet residential area. This proposal therefore would do significant and lasting damage to people’s lives and so must be rejected.

Resident Rep 29

08-04-21

About Bryan Avenue, the local area and its residents and why I strongly oppose granting a license for Gorillas Inc. for 113 Bryan Avenue:

I have lived in Bryan Avenue since 2006. The Avenue is a very quiet and narrow residential street. It is home to many families with children and elderly residents. Due to the internal layouts most homes on the Avenue have street facing bedrooms. The Avenue sits within an ADRC (Area of Distinctive Residential Character). In the very immediate area is a large Catholic Church and an Islamic College.

Considering the character of the local area and for the reasons outlined in my submission below, I strongly oppose granting a license for Gorillas Inc. for 113 Bryan Avenue. This outcome would negatively impact on the community living in the neighbourhood. Also, importantly, the proposed hours of operation (e.g., significantly after 5pm and at weekends), changes the nature of the use of the premise and is totally different for what has previously been allowed.

Change of Usage Significantly Differs From Original:

Previous businesses using 113 Bryan Avenue have operated 8am to 6pm on weekdays and not on weekends, apart from one business that had some limited activity on Saturday mornings. Also, none of these businesses had any connection with alcohol. To accept this proposal would change the nature of usage which greatly differs to what has been allowed to date. Presumably the operating hours in use historically and up until now were implemented to respect that this is a residential area.

Public Nuisance - Extended Operational Hours and Deliveries:

The proposal is for operating hours from 8am to midnight seven days a week. In reality, the business would be opening and closing well outside these already anti-social hours in a residential area.

The licence application does not specify what times deliveries can take place. So big delivery trucks could descend upon the street at any time.

Public Nuisance – Operating Practices:

The Gorillas website states it undertakes deliveries using e-bikes. But there is no licence condition for this operating practice. So, there is a real risk that more noisy and polluting forms

of vehicles will be used. This is a major concern given that the demand for their services will come in the evening so accentuating the public nuisance. The business has not explained what toilet and rest room facilities will be provided for their workers. The local community must have assurances that these will be made available on-site to stop workers from using the surrounding public spaces for these activities.

Public Safety Concerns – Traffic:

Bryan Avenue is a very narrow street with resident parking along most of it. Plus, there is a slope and several blind spots. All these factors have resulted in numerous car scrapes and accidents over the years. The most recent took place at the start of 2021 and ironically involved a near fatal delivery bike crash.

To increase the amount of traffic would be dangerous and physically there is no space for delivery vehicles/bikes to park safely. Parking available for residents is already limited and this proposal will make this even more constrained.

If the hours of operation coincided with schools, there would be the additional risk to children walking to and from school.

Has the Council conducted a traffic impact study to assess all these risks?

Public Safety Concerns – Crime:

The licence will mean that high value goods such as alcohol will be kept on site. This will increase the risk of burglaries.

Public Safety Concerns – Litter, Rubbish, Pollution and Noise:

The business will increase litter, rubbish, pollution and noise on Bryan Avenue and the local area. This is due to the vastly higher usage of the street by an activity that it is not designed for. At present, there are no public bins installed in the street to deal with this litter. The noise created by the business is the biggest concern, especially given the proposed hours.

Better Local Options:

In conclusion, the local area has several far more suitable sites for this licensed business. If this business was in a place zoned for light industrial or warehousing, all my objections would be redundant. BUT, as described, Bryan Avenue is a narrow street in a very quiet residential area. This proposal therefore would do significant and lasting damage to people's lives and so must be rejected.

Resident Rep 31

12-04-21

About Bryan Avenue and the local area and why I oppose granting a license for Gorillas Inc. for 113 Bryan Avenue: I have lived in Bryan Avenue since 2001. The Avenue is a very quiet and narrow residential street with many families with children living here plus there are elderly residents. Due to the internal layouts most houses on the Avenue have street facing bedrooms. The Avenue sits within an ADRC (Area of Distinctive Residential Character). In the immediate area is a Catholic Church and an Islamic College. For the reasons outlined in my submission, I strongly oppose granting a license for Gorillas Inc. for 113 Bryan Avenue since it would significantly negatively impact on the community living in the Avenue and the local area. Plus, this proposal is totally out of character for what has previously been allowed. Public Nuisance - Extended Operational Hours and Deliveries: The proposal is for operating hours from 8am to midnight seven days a week. The reality is that the business would be opening and closing well outside these already anti-social hours for a residential area. The licence application does not specify what times deliveries can take place. So big delivery trucks could descend upon the street at any time. Public Nuisance – Operating Practices: The Gorillas website states it undertakes deliveries using e-bikes. But there is no licence condition for this operating practice. So there is a potential risk that more noisy and polluting forms of vehicles will be used. This is a real concern given that the main demand for their services will come in the evening so exasperating the public nuisance. The business has not explained what toilets and rest room facilities will be provided for workers. The local community must have assurances that these will be made available to avoid the workers using the surrounding public street for these activities. Public Safety Concerns – Traffic: Bryan Avenue is a very narrow street with resident parking along most of it. Plus, there is a slope and several blind spots. All these factors have resulted in numerous accidents over the years. The most recent took place at the start of 2021 and ironically involved a near fatal delivery bike crash. The width of the street has also led to numerous cars being scraped. To increase the

amount of traffic would be dangerous and physically there is not much space for delivery vehicles to park safely. Parking available for residents is already limited and this proposal will make it even more difficult for residents to park. If the hours of operation coincided with schools, there would be the added risk to children walking to and from school. Has the Council conducted a traffic impact study to assess all these risks? Public Safety Concerns – Crime: The licence will mean that high value goods such as alcohol will be kept on site. This will increase the risk of burglaries. Public Safety Concerns – Litter, Rubbish, Pollution and Noise: The business will increase litter, rubbish, pollution and noise on Bryan Avenue and the local area. This is due to the vastly higher usage of the street by an activity that it is not designed for. Out of Character: Previous businesses using 113 Bryan Avenue have operated 8am to 6pm on weekdays and not on weekends, apart from one business that had some limited activity on Saturday mornings. Also, none of these businesses had any connection with alcohol. To change its usage now is out of character to what has previously been undertaken. Better Local Options: The local area has several far more suitable sites for a licensed business. If this business was in a place zoned for light industrial or warehousing, many of my objections would be redundant. BUT, as described, Bryan Avenue is very residential area, and this proposal would do significant and lasting damage to people's lives.

Resident Rep 32

12-04-21

1) Prevention of Crime and Disorder While the applicant has currently no intention of having customers coming to the premises to collect their orders for off licence alcohol there is nothing to prevent them allowing customer collections in the future. The premises is located in the midst of a residential area and as such is unsuitable for such business. The fact that alcohol is being stored at the premises will attract a criminal element and put not only the premises at higher risk of robbery but also increase the risk for the surrounding area. 2) Public nuisance is a common law offence involving environmental danger or loss of amenity or offensive public behaviour. Should collections by customers be allowed there is a distinct possibility of those customers then consuming that alcohol near the premises and thus causing public nuisance and anti-social behaviour. In addition the extra traffic both from the collection of orders from the site and from deliveries being made to the premises with by its nature of excessive traffic and noise cause a loss of amenity to the local population, especially in light of the fact that they are looking to be open from 8am to Midnight, 7 days a week. While most people come to expect some disturbance during normal working hours, it is unfair to expect people to put up with such disturbance until Midnight and beyond, for although the deliveries will stop at Midnight, there will be other traffic and noise after that time as the premises is closed, possibly cleaned and secured. 3) Public Safety: The location of the site on Bryan Avenue means that any extra traffic is likely to cause a danger to both road users and pedestrians. Bryan Avenue is a narrow two-way road, where currently it is difficult for 2 cars to pass. Both sides of the road have residents parking provided and the extra traffic caused by this will no doubt cause an increase in pollution due to the increased traffic and the delays and hold ups that the narrowness of the road will cause 4) Prevention of Children from Harm: As in the case of Ella Adoo-Kissi-Debrah, there will be the added risk to the health and wellbeing of the local population and especially children, cause by the increase in traffic and pollution. While Many of the vehicles maybe electric, there is no guarantee of this, and the increase in slow and stationary traffic will add to the air pollution in the area and increase the risk of pollution related deaths.

Resident Rep 33

13-04-21

This is a completely unsuitable premises for this company. Bryan Avenue is a residential street with limited parking and with bedrooms that face onto the road. The hours of operation will significantly impact the quality of life of residents. Bryan Avenue is a road with a sharp bend and there have been accidents. This will increase hugely with the coming and going of delivery drivers from 0800 - midnight making it less safe for residents. There will be an increase in anti social behaviour as inevitably delivery drivers will be waiting around for extended periods of time. This property has historically been used for storage and during office hours only and the applicant seeks to change this completely. The negative impact on residents cannot be overstated.

Resident Rep 35

13-04-21

I object for the following reasons: • Bryan Avenue is a quiet, residential street not suited to a business of this nature • The proposed hours of operation are excessive and would cause considerable noise disruption for the residents on the street • There will be a considerable impact on pollution and air quality on the street due to a drastic increase in traffic • The proposed usage is out of character with previous uses, and should therefore be subject to obtaining permission for a change of use • There are many more suitable options in the local area away from residential areas.

Resident Rep 36

13-04-21

Hi, I'm concerned regarding nuisance from the couriers and deliveries, littering, long hours of operation, increased risk of traffic accidents. Bryan Avenue is a residential street with most bedrooms facing the street. The past 6pm license would really affect us residents. please take this into consideration.

Resident Rep 37

13-04-21

An application licence has been submitted for the premises of 113 Bryan Avenue, being used for business activities which are going to have a significant, lasting and negative impact on this quiet and narrow residential road and surrounding roads. The application submitted has been made to request to operate during unsociable hours up until midnight, 7 days a week, including Bank Holidays. This is an unacceptable request on a quiet residential road, with front facing bedrooms which will contribute to noise with operational noise, noise of deliveries, resulting to people's sleep being disturbed. We have a lot of families with small children and to disturb their sleep is unacceptable.

This Warehouse (113 Bryan Avenue) is on a bendy road, so if deliveries are operating all these long hours this is going to cause traffic building up meaning that cars coming down from the hill will not be able to get past if the deliveries are going to be coming and going. This will result to disruption being caused, not to mention the noise of car, motorbike, lorries etc noise with engines being on, again causing noise and disturbance to all the residents on this street and surrounding streets. I strongly disapprove of this application being granted and I ask that my email is carefully taken into consideration and that this application is not approved. It is unfair to all the residents, families and children that live on this road and surrounding roads. This will cause major disruption on a close and quiet neighbourhood.

Resident Rep 39

14-04-21

The Prevention of Crime and Disorder – With alcohol being stored in the warehouse on a quiet residential street the risk of break-ins are increased. During the pandemic several retail establishments in the area have had people coming in and stealing alcohol. Bryan Avenue has also had spates of break-ins over the years and we do not need a crime magnet in the area. Public Safety – Bryan Avenue is a narrow street with a blind curve ¾ of the way up with cars regularly parked on both sides all along its length. The influx of delivery drivers/riders rushing up and down the road is very likely to end in an accident for either a driver or a local pedestrian. At 11pm on March 8th a delivery driver was in a life altering accident (we do not know if they survived) right around the area of the curve. 11pm is within the requested operation hours of the license so with more and more delivery persons zooming up the hill this sort of accident will only increase. The prevention of Public Nuisance – Bryan Avenue is a quiet road where due to the layout of the buildings most of the resident's bedrooms face the street. The hours of operation associated with the license request are entirely out of keeping with any business that has been in residence previously (the proposed hours of operation are 8am – 12am, 7 days a week). These hours, especially when combined with the lack of provision for couriers on the warehouse ground plan will lead to disturbance throughout the evening/night as the couriers arrive and depart or loiter waiting for their next callout. Bryan Avenue does not have a provision for public bins and the garden next to the warehouse is meant to be for

the residents of Grange House so any littering or congregation workers will have additional disruptive impact. We are not aware if the business has restroom and toilets to drivers and concerned how this will impact on residents.

Resident Rep 40

15-04-21

I have been a resident of Bryan Avenue since June 2001.

You will see, from the many objections already received by yourselves, how much distress this licence application is causing to the residents of Bryan Avenue and nearby neighbours.

I am writing to express my own strong objections on the following counts:

PREVENTION OF CRIME & DISORDER

Alcohol is an expensive stock item. It is likely to draw the attention of criminals. The risk of break-ins is huge. We abhor the idea of having a crime magnet on our peaceful road.

When I say 'we', I include all those I spoke to, individually, when knocking door-to-door to collect signatures for our petition. It is important to note that the Application notice put up by Gorillas (on the front gate of the warehouse) was woefully vague, leaving many residents in the dark about what was actually being proposed.

PUBLIC SAFETY

Bryan Avenue is a narrow road with cars generally parked on both sides. There is a blind curve and over the years there have been many incidents of damage to cars and even demolished front garden walls due to speeding and careless drivers. A much more serious example of risk is that of a delivery driver who crashed his vehicle and is understood to have sustained serious head injuries. This happened at 11pm on March 8th THIS YEAR. We are sadly not sure if the young man survived.

With a ten-minute promise of delivery made by 'Gorillas', it is not just a worry that large numbers of courier drivers will be rushing up and down Bryan Avenue - IT IS A GIVEN.

PUBLIC NUISANCE

How can the upheaval to residents caused by this business not be considered a public nuisance? Our peace and quiet will be shattered, for a proposed 16 HOURS PER DAY, 7 DAYS PER WEEK. On this quiet, residential road! Besides delivery lorries and the early morning and very late night opening and closing of METAL SHUTTERS & METAL GATES, can there be any expectation that the couriers will be quiet whilst congregating? Hardly!

PROTECTION OF CHILDREN FROM HARM

I am hugely concerned for children's safety due to increased traffic to and from this warehouse. The pavements are narrow, many children walk to local schools (of which there are many). A ten-minute delivery promise to customers will undoubtedly place a sense of urgency on drivers. An urgency that will inevitably lead to an unacceptable risk of harm to child pedestrians.

ANTI-SOCIAL BEHAVIOUR

I understand that up to this late stage, the Business Licence Committee has not asked the opinion of the Council officer in charge of anti-social behaviour. I understand that Brent Council is aware of anti-social behaviour among delivery drivers in the Borough of Brent. This may have to be tolerated by Brent residents who unfortunately live beside busy delivery outlets next to shops and busy Brent streets. Bryan Avenue does not fall into this category. Bryan Avenue residents will not tolerate anti-social behaviour on our much valued peaceful and harmonious road.

Thank you for your considerations.

Resident Rep 41 – see separate letter

Resident Rep 42

15-04-21

Objections: Prevention of Public nuisance; Public safety The licence, if granted, would be likely to lead to a considerable increase in commercial traffic (delivery vehicles: vans and mopeds) in what is otherwise a quiet area mainly consisting of domestic dwellings. This would represent a risk to pedestrians - particularly children and other vulnerable residents. It would also represent a nuisance in terms of volume of traffic activity and noise – particularly at night.

Resident Rep 43

15-04-21

This is a school area and very residential. I object based on the prevention of harm to children through what is already a dangerous area with homeless and alcoholic people roaming the area and also avoiding public nuisance.

Resident Rep 44

15-04-21

Public nuisance - delivery vehicles constantly coming and going in a densely populated residential area is not appropriate.

Resident Rep 45

15-04-21

This will be a hot bed for crime due to the hours kept. The noise and the parking of delivery vehicles will impact on residents in the area as parking spaces are premium. More possibilities of children being put in danger from high increase of traffic & heavy goods vehicles in a residential area. This is not suitable for a residential area and but a more suitable business for a trading estate of which there are many in the area that can handle this kind of disruption 7 days a week for 14 hours a day.

Resident Rep 46

15-04-21

This is a quiet residential area close to a local park. The warehouse is across the road from our church, where quiet prayer is held alongside church services. The warehouse would have constant traffic from delivery vehicles (lorries and bikes), 7 days a week, 16 hours a day, resulting in air pollution, noise pollution, public safety issues and causing a danger to children walking to and from the local park, school and church.

Resident Rep 47

15-04-21

This is in the heart of a residential area, totally unsuitable for the proposed purposes. There is a church, schools and a park nearby, so children would be endangered by all the extra delivery traffic, inbound and outbound, 7 days a week. Additionally the nearby main road (Harlesden Road) is already congested and has problems with vehicles speeding. This proposal is completely unsuitable and unacceptable.

Resident Rep 48

15-04-21

I object to have a commercial building in a purely residential area running a business associated with alcohol through antisocial hours. It is also very close to our church and truly feel that the proposed use of these premises is really not in keeping with the area

Resident Rep 49

15-04-21

I think it is absurd that a warehouse would be positioned in such a quiet residential area. This seems crazy and will cause noise, traffic, deliveries during all hours and antisocial hours.

Resident Rep 50

15-04-21

As you will be aware, local residents recently became aware of a licensing application submitted by Gorilla Inc with regard to 113 Avenue. In addition to the liquor license being inherently inappropriate in the circumstance, the application has also brought to light a raft of other associated issues. It is my understanding that Planning have a role as statutory consultees, to the licensing application. Given that a successful licensing application would effectively authorise a change of use that should require planning permission, could you please raise an objection by the end of this week 16 April 2021. 113 Bryan avenue NW102AS has planning permission as Class B8 Storage. The site was previously used by Brent Council to house medical equipment. For decades, the site has not been used outside normal office / warehouse hours ie. 8am to 6pm weekdays, with some minimal use on Saturday mornings and no use at all on Sundays. The application for the liquor license cites operating hours of 8am to Midnight 7 days a week. Delivery vehicles and couriers will be continually coming and going. This amounts to a change of use of the premises. In addition, it is likely that some level of retail activity / pick up will occur. 113 Bryan avenue is located in a quiet residential street, and is surrounded by houses with bedrooms facing the street. Granting a license to enable an enterprise of this nature, which is entirely out of keeping with the area, will severely and detrimentally impact the lives, privacy, comfort and common rights of the residents of Bryan Avenue and the whole Dobree Estate. There are any number of more suitable sites available locally for a licensed business, especially given the large number of failed businesses / empty commercial sites due to the pandemic etc. There are a number of light industrial estates locally with vacancies, Park Royal is not far away, the local High Roads, in serious need of revitalisation and rejuvenation have many vacant shops and premises. There are a number of closed and boarded up pubs locally etc. Please note that this licensing application and Gorillas change of use plans are causing widespread concern and alarm in our community, as illustrated by the cc list above. Two local counsellors are also involved. The actual numbers of impacted and concerned residents is however understated. Many residents are elderly, not proficient with computers or speak English as a second language and are not comfortable in writing emails or lodging representations. A petition has additionally been circulated and submitted. Given the situation could you please look into this matter as a matter of urgency.

Resident Rep 51

15-04-21

My husband and I object as we live around the corner on [REDACTED] and are concerned as it's a residential area and a warehouse has no place here. The increased traffic with deliveries and collections could be a public nuisance and a danger to pedestrians in the vicinity. There will also be an increase in noise.

Resident Rep 52

15-04-21

Change of Usage Significantly Differs From Original: Previous businesses using 113 Bryan Avenue have operated 8am to 6pm on weekdays and not on weekends, apart from one business that had some limited activity on Saturday mornings. Also, none of these businesses had any connection with alcohol. To accept this proposal would change the nature of usage which greatly differs to what has been allowed to date. Presumably the operating hours in use historically and up until now were implemented in consideration of the residential character of the area. Public Nuisance - Extended Operational Hours and Deliveries: The proposal is for operating hours from 8am to midnight seven days a week. In reality, the business would be opening and closing well outside these already anti-social hours in a residential area. The licence application does not specify what times deliveries by big lorries to the warehouse can take place. So big delivery trucks could descend upon the street at any time. Public Nuisance – Operating Practices: The Gorillas website states it undertakes deliveries using e-bikes. But there is no licence condition for this operating practice. So, there is a real risk that more noisy and polluting forms of vehicles will be used. This is a major concern given that the demand for their services will come in the evening so accentuating the public nuisance. The business has not explained what toilet and restroom facilities will be provided for their workers. The local community must have assurances that these will be made available on-site to stop workers from using the surrounding public spaces instead of actual toilet facilities inside the warehouse. Public Safety Concerns – Traffic: Bryan Avenue is a very narrow street with resident parking on both sides of the street. Plus, there is a slope and several blind spots. All these factors have resulted in numerous car scrapes and terrible accidents over the years. The most recent took place at the start of 2021 and ironically involved a near fatal delivery bike crash. To increase the amount of traffic would be dangerous and physically there is no space for delivery vehicles/bikes to park safely. Parking available for residents is already limited and this proposal will make this even more constrained. If the hours of operation coincided with schools, there would be the additional risk to children walking to and from school.

Public Safety Concerns – Crime: The licence will mean that high value goods such as alcohol will be kept on site. This will increase the risk of burglaries. Moreover, as the e-bikers are leaving the area, it is possible that they would come under attack by individuals who might want to rob them of whatever alcoholic beverage they are taking to their customers. Public Safety Concerns – Litter, Rubbish, Pollution and Noise: The business will increase litter, rubbish, pollution and noise on Bryan Avenue and the local area. This is due to the vastly higher usage of the street by an activity that it is not designed for. At present, there are no public bins installed in the street to deal with this litter. The noise created by the business is the biggest concern, especially given the proposed odd hours. Better Local Options: In conclusion, the local area has several far more suitable sites for this licensed business. If this business was in a place zoned for light industrial or warehousing, all my objections would be redundant. But, as described, Bryan Avenue is a narrow street in a very quiet residential area

with all the bedrooms of the marionettes facing the street. This proposal therefore would do significant and lasting damage to people's lives and will affect the quality of their life. Hence, it must be rejected.

Resident Rep 53

16-04-21

This objection is being raised under the Prevention of Public Nuisance. A utility which keeps such unsociable hours is completely unacceptable in a residential area. Furthermore, the anticipated increase in traffic over those hours make this a potential increased pollution issue.

Resident Rep 54

16-04-21

I worry that the crime rate will go up when people know that alcohol is stored on the premises and the traffic will cause problems like parking and crossing safely especially as we are a family community and have our children crossing roads on the way to school etc, and we really struggle for parking so if there are more vehicles local residents will find it difficult to park.

Resident Rep 55

16-04-21

I am dismayed that the council has allowed this proposal instead of, for example, using the space to build a school or playground- both are much needed in the community. I object in the grounds of public safety and prevention of children from harm (increased traffic risks and pollution)

Resident Rep 56

16-04-21

Bryan Avenue is a peaceful residential street with flats and houses, mostly occupied with families with young children. This application will cause immense disruption and noise pollution in the whole area. The application states that service will run from 0800hrs to 0000hrs 7 days a week therefore: I STRONGLY OBJECT to this application on the following grounds. Public Safety I understand that the warehouse will be stocked with a high volume of alcohol. The area is wholly residential and families with young children from different backgrounds celebrate 5 November, New Year's Eve, Diwali and Chinese New Year with firework displays in their gardens. Most gardens from Peters Avenue back onto the warehouse. This would cause total mayhem if a firework were to go astray near the warehouse. The warehouse is also located extremely close (10m) to an Electrical Housing and within a 100m of a place of worship. Prevention of Public Nuisance – Prevention of Children from Harm - Noise The whole area is highly residential. There are no other shops (apart from a family Pub which the warehouse backs onto) within a 200m radius. The impact of lorries trying to find parking to restock the warehouse whilst people are trying to sleep will be beyond an acceptable level. Workers will be arriving early for work and finishing late, that together with the hard wheel trolleys from deliveries will create a constant noise earlier than the stated 0800 opening and later than the 0000hrs closing 7 days a week. Couriers coming and going throughout the extended hours will increase traffic problems and present an additional danger to public safety. Gorilla have a 10 minute PROMISE for delivery so it is GURANTEED that there will be a significant increase of traffic on Bryan Avenue and the surrounding area with couriers RUSHING to Collect the order. The bottom part of Bryan

Avenue has a bend and an incline, and vehicles passing each other always exercise additional care to avoid collision. Due to street parking on both sides, the space for pulling in towards the curb is limited this will significantly increase the risk of traffic accidents. Collection of business/commercial waste. More lorries endlessly collecting business/commercial waste on an already narrow road, this will considerably add to the increased traffic flow of the deliveries, couriers, and cause obstruction on the pavement. All other delivery businesses are located on the High Street, where there are appropriate facilities: daily cleaning, public litter bins, traffic regulations and regular policing. Prevention of Crime & Disorder The Prevention of Crime and Disorder - With alcohol being stored in the warehouse on a quiet residential street the risk of burglary and theft is drastically increased. Thieves have robbed several retail establishments in the area however they only stock a reasonable amount of alcohol. Bryan Avenue has also had series of break-in over the years, we do not need a crime magnet to attract delinquency to the area. Location We already have a high street that is crying for business and an industrial estate in Park Royal that needs to be filled. The Government is encouraging us to support out local businesses, the opening of this type of activity on a residential street will have a negative economic impact on our local traders and leave commercial premises empty. Finally One policy from The Licensing ACT 2003: Encourage greater community involvement in licensing decisions and giving local residents the opportunity to have their say regarding licensing decisions that may impact upon them. IS ANYBODY LISTENING? DOES ANYBODY REALLY CARE?

Resident Rep 57

16-04-21

Residential area, there will be deliveries at unsociable hours and increased traffic due to deliveries.

Resident Rep 58

16-04-21

Bryan Avenue is a peaceful residential street with flats and houses, mostly occupied by families with young children. This application will cause immense disruption and noise pollution in the whole area. The application states that service will run from 0800hrs to 0000hrs 7 days a week, therefore: I STRONGLY OBJECT to this application on the following grounds. Public Safety I understand that the warehouse will be stocked with a high volume of alcohol. The area is wholly residential, and families with young children from different backgrounds celebrate 5 November, New Year's Eve. Diwali and Chinese New Year with firework displays in their gardens. Most gardens from Peters Avenue back onto the warehouse. This would cause total mayhem if a firework were to go astray near the warehouse. The warehouse is located extremely close (10m) to an Electrical Housing and within 100m from two places of worship, a day nursery and a college. Prevention of Public Nuisance – Prevention of Children from Harm - Noise The whole area is highly residential.

There are no other shops (apart from a family Pub which the warehouse backs onto) within a 200m radius. The impact of lorries trying to find parking to restock the warehouse whilst people are trying to sleep will be beyond an acceptable level. Workers will undoubtedly arrive early for work and finishing late, that together with the hard wheel trollies from deliveries, will create a constant noise earlier than the stated 0800 opening and later than the 0000hrs closing 7 days a week. Couriers coming and going throughout the extended hours will increase traffic problems and present an additional danger to public safety. Gorilla has a 10-minute PROMISE for delivery, it is GUARANTEED that there will be a significant

increase of traffic on Bryan Avenue and the surrounding area with couriers RUSHING to Collect the order. The bottom part of Bryan Avenue has a bend and an incline, and vehicles passing each other always exercise additional care to avoid a collision. Due to street parking on both sides, the space for pulling in towards the curb is limited; this will significantly increase the risk of traffic accidents. Collection of business/commercial waste. More lorries endlessly collecting business/commercial waste on an already narrow road, this will considerably add to the increased traffic flow of the deliveries, couriers and cause obstruction on the pavement. All other delivery businesses are located on the High Street, where there are appropriate facilities: daily cleaning, public litter bins, traffic regulations and regular policing. Prevention of Crime & Disorder The Prevention of Crime and Disorder – With alcohol being stored in the warehouse on a quiet residential street, the risk of burglary and theft is drastically increased. Thieves have robbed several retail establishments in the area however they only stock a reasonable amount of alcohol. Bryan Avenue has also had series of break-ins over the years. We do not need a crime magnet to attract delinquency to the area. Location We already have a high street that is crying for business and an industrial estate in Park Royal that needs to be filled. The Government is encouraging us to support local businesses. The opening of this type of activity on a residential street will negatively impact our local traders and leave commercial premises empty. Finally One policy from The Licensing ACT 2003: Encourage greater community involvement in licensing decisions and giving local residents the opportunity to have their say regarding licensing decisions that may impact upon them.

Resident Rep 59

16-04-21

Bryan Avenue is a narrow street with a blind curve ¾ of the way up with cars regularly parked on both sides all along its length throughout the day. The influx of delivery trucks, but also of drivers/riders rushing up and down the road is very likely to end in an accident for either a driver or a local pedestrian. The '10 minutes delivery promise' of Gorillas is simply a call for speed on behalf of the delivery riders, and Bryan avenue / the Dobree estate do not have streets wide enough for those riders to drive safely around. Furthermore, Bryan Avenue is a quiet road where due to the layout of the buildings most of the resident's bedrooms face the street. The hours of operation associated with the license request are entirely out of keeping with any business that has been in residence previously (the proposed hours of operation are 8am – 12am, 7 days a week). These hours, especially when combined with the lack of provision for couriers on the warehouse ground plan will lead to disturbance throughout the evening/night as the couriers arrive and depart or loiter waiting for their next callout. Bryan Avenue does not have a provision for public bins and the garden next to the warehouse is meant to be for the residents of Grange House so any littering or congregation workers will have additional disruptive impact. We are not aware if the business has restroom and toilets to drivers and concerned how this will impact on residents.

Resident Rep 60 – see separate letter