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Key: Writing in black and blue = Gorillas Head of Legal UK
Writing in green and red = Susana Figueiredo

From: Gorillas Head of UK Legal
Sent: 15 November 2021 15:57
To: Susana, Figueiredo
Cc: Gorillas manager
Subject: Re: Gorillas, Bryan Avenue - Premises Licence

Hi Susanna,

Thanks for sending the attached photos. I am not clear that the photos confirm with certainty any of the points referenced in your email below occurred. CCTV would need to be checked

1) The road being blocked on 31st October 2021

You will see from the attached picture - it looks like there is actually a blue car behind the white car, which may be 'blocking' our access to the property. I have had reports from the warehouse that residents are intentionally blocking or making our access difficult to the property. It would be good to discuss with the Council how we can minimise residents behaving in this manner.

I cannot open the picture you attached. The lorries that arrive, do not drive onto the premises and therefore it would be impossible to block access. The lorries pull up in the middle of the road or use resident bays, which as per my email yesterday, is not permitted. Please send me photographs of the vehicles blocking the entrance with the associated door number they live at and I then take this up with the residents.

•2) A driveway being blocked on 28th October 2021

This picture appears to show a lorry legally parked on a single yellow line, where I understand unloading purposes are permitted. See [here](#)

When you initially wrote to me, you spoke of vehicles parking in resident bays. Now we have moved onto single yellow lines. I'm slightly confused by this.

As is the case for parking and general comings and goings of drivers on public roads - I would assume that two drivers would politely speak to each other if one needed to get past the other.

When you live on a street and want to leave your home in your vehicle, I do not think it is reasonable to expect to be faced with having to wait for a lorry that is blocking the road to unload on a regular basis. The residents can't politely ask the lorry to move because they have to wait for unloading to be completed.

3) A rider with no lights

As mentioned the lights are powered by the battery on the bike. I will look into whether our Tech team can assess if this photo has been digitally altered. If you can

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tell me the exact time and date and location this was taken, I will also look into which rider and bike this was to also check with them.

Multiple residents have reported that the lights weren't working, not just one. How would you explain away the lights that were provided to the riders by one of the residents, if there were no issues?

You are suggesting that a resident modified the photo. For what purpose would this be? The riders are riding unsafely and the residents have pointed this out in looking out for them.

4) XXXX lorry idling on 7th October 2021

Please confirm how you know this lorry was 'idling'. It is a picture of a lorry which appears to have it's lights on. It could have been setting off or just arriving. Is there a reason you make this statement as if it is a fact? XXXX is also not a delivery partner I believe we work with or receive deliveries from, and so it may have been making a home delivery to a resident. I would need to look into this further. XXXX is also a third party company - so please also feel free to contact XXXX directly should you wish.

The resident complained that it was idling. XXXX was parked right outside Gorillas.

5) The road being blocked on Sunday 3rd October 2021 @ 8.30am preventing a vehicle from leaving its parking space

The photo appears to show a lorry parked at the side of the road. It is also unclear how a vehicle is being prevented from leaving a space, please can you provide me with more information about this and why you believe it is blocking the road. If a vehicle did however ever need to leave a space I would assume, as happens on roads throughout the UK, the two drivers would speak to one another to enable one driver to move for another so they can exit.

The picture is self-explanatory. The lorry was in the middle of the road. The resident's vehicle was parked alongside the lorry in a bay and could not move.

6) A rider riding on the pavement on 3rd October 2021

This rider doesn't appear to have his feet on the pedals. As mentioned I have gone back to you in terms of the training we provide to our riders, and also the follow ups to riders we recently made to reiterate on no pavement riding.

The rider was riding on the pavement. He came to a stop to enter the premises.

Complaints

I assume one of the Council's roles is to act as a 'rational sense check' on complaints made by residents, to make sure these are not immaterial and/or not applicable / valid. Could I suggest that CCTV is reviewed as the authority on what actually happened in relation to incidents that are deemed material and necessary for investigation? CCTV could be a useful truth of these incidents rather than

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resident complaints. I believe we keep our recordings for 31 days. Alternatively and/or in addition to, may I suggest you ask your residents to take videos going forwards, rather than pictures.

You make a very good point here. Having been more than reasonable with the start-up of the business, it has now been running for over 7 months. I do not see a business that is trying to work with residents to ensure nuisance is kept to a minimum, rather excuse after excuse. Indeed a resident has been writing to yourself and XXXX and these emails are being ignored. I have met with the residents and they have been very vocal about wanting the business to be successful, just not at the expense of them living at peace. I am satisfied with the information that has been sent to me by residents.

The condition in relation to 7+ ton deliveries between 9am-3pm is not being met (you still haven't confirmed whether you would like to take advantage of the 2 hour extension). Complaints of lorries blocking the road, a driveway and parking spaces, have been received. Lorries are using parking bays, idling and making noise when unloading. Up until a few weeks ago, riders were riding without any lights on. The bottom line is, if Gorillas could resolve these issues, then there wouldn't be any need for further complaints.

To date, I have not seen any suggested resolutions, just denial and a suggestion that residents are making it up.

Please can you confirm the full variation will be submitted as per my request yesterday.

Full Variation

I refer back to my email dated 4th October 2021 where a request for a variation of the premises licence was asked to be submitted within a week in relation to the removal of condition 16. It is now approximately 5 weeks since this request was made and an application has still not been received. Please submit the variation this week.

Best,

XXXXXX

On Mon, 15 Nov 2021 at 13:24, Susana, Figueiredo <Susana.Figueiredo@brent.gov.uk> wrote:

Dear XXXXX & XXXXX,

Please see my responses below in red.

Photographs attached of an example of:-

- The road being blocked on 31st October 2021
- A drive way being blocked on 28th October 2021
- A rider with no lights
- Spar lorry idling on 7th October 2021

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- The road being blocked on Sunday 3rd October 2021 @ 8.30am preventing a vehicle from leaving its parking space
- A rider riding on the pavement on 3rd October 2021

I look forward to hearing from you soon.

Kind regards

Susana Figueiredo