

From: John Skoulding
Sent: 19 August 2022 18:45
To: Licensing HF: H&F ; Overton Adrian: H&F
Cc: John Skoulding
Subject: 2022/01153/LAPR: Pizza Pronto: 30 North End Crescent London W14 8TD - OBJECTION

Dear Licencing Committee Chairperson, Mr Overton, LBHF,

I have today tried three times to submit online the objection set out below using the LBHF public access comments page on the LBHF site. I have either been timed-out or sent an "error" message when I press "submit". Please would you accept this email as my objection submitted within the time limit for comments by members of the public. Please contact me using this email or the number given below should you wish to discuss.

Introduction

For context, most of the roads adjoining or linking to the North End Crescent (NEC) such as the one I live on are fully residential roads. The NEC and NE Road are mixed use semi commercial. My road has 50+ houses on it either occupied by one family or split into flats. Many like myself have young children in our families. We already suffer from issues with vast numbers of delivery and dispatch motorbikes parking at the end of the road (groups of dispatch riders meeting, talking late into the night, littering, urinating, (a constant issue), the incessant sleep-breaking noise of the bikes whizzing along our roads during the sensitive hours of 8pm to 7 am, instances of riders mounting the pavements and even riding along the pavements, the added danger that virtually all of them are L-plate drivers who drive well in excess of the 20 mph speed limit and have had instances where they have hit or scratched the cars parked on the road. In the case of my Road the problem is exacerbated by the fact that dispatch riders constantly use it as a cut through road to access Dawes Road and beyond thereby vastly increasing the number of users well into the night when we are trying to sleep. Congregations of dispatch riders and late-night venues are now sadly linked to drugs with all the unholy alliance of dangers and problems that brings for residents, increased demand for policing, business owners scared to report any of this, street sales of alcohol etc. etc..

The issues here principally relate to hours. In my experience no residents are happy with activity after 23:00 let alone after midnight. I unconditionally oppose this application.

Licensing Objective Prevention of Crime and Disorder

This Applicant has traded until 2am outside permitted hours WITHOUT A LICENCE thereby increasing the demand for delivery drivers and evidencing a blatant disregard for the law and the rules. How can they be trusted? Have the Licensing Authority told the shop to stop trading after 24:00; have the Police?

Pizza Pronto has been trading illegally, without any license at all to serve 'Late Night refreshment' after 24:00. So, 24:00 to 2am is illegal. Their 2am licence expired in December 2021 and should not be re-instated.

Why reward a Premises that has not been upholding the law by granting them a licence for 2am let alone anything later to 5am? Wouldn't it make more sense for the Premises to show that they can work within the law for at least a year or more and then apply for a licence for hours after 23:00? Please would you ask the applicant why they have been operating illegally i.e. after 23:00, without a licence and why he thought he could flaunt the law for so long? Why was this not enforced by the police and the licence authority?

Post COVID, crime in NEC area and North End Road and the immediate surrounding area is rising, unfortunately, not only during the day but also at night; more delivery drivers cause altercations with vehicles and bicycles, cycle altercations, problems at McDonalds (open till midnight) including robberies witnessed by families with children are becoming too common, again. Residents on the Next-Door app report these unfortunate incidences, all too regularly. Dispatch drivers often argue amongst themselves and have been seen stealing food from the very outlets that you are seeking to licence. All of this is anti-social behaviour and is precisely what residents expect the local authorities to crack down on. Why else invest in the area and pay the council tax?

Licensing Objective The Prevention of Public Nuisance

A licence until 2am or 5 am will add to the ongoing problems in and around NEC and NE Road at late night hours. 30 NEC is very near residential properties, with several directly above as well as across the road and so would harm the amenities of these properties because of noise and disturbance, particularly late at night, generated by customers and delivery drivers entering and leaving both the Premises itself and neighbouring residential side streets where customers are likely to park their vehicles and delivery drivers congregate. We are all, and children, are entitled to a good night's sleep. Increased late night activity (including deliveries, refuse collections, dispatch riders none of whom have electric bikes) directly put this at risk. Please ask the applicant what assessment have they carried out on the impact of extended hours on local residents and, in particular, the right to sleep? What specific protections for residents are they putting in place?

What assessment has Pizza Pronto made of the impact on residents? Residents are genuinely concerned about "commercial creep" i.e. if one is allowed it then all applicants will be. In no time at all there could be multiple late-night outlets driving higher and higher volumes of business dependant on hundreds of dispatch riders speeding around Fulham & Hammersmith with greater levels of noise and disruption. Where does the Committee intend to draw the line and recognise residents' rights and concerns? What specific measure are they signing up to – only using all electric dispatch vehicles and motorbikes in line with LBHF's green climate initiative, no commercial deliveries or refuse collections after 8pm and before 8 am? How do residents and the community benefit from a pizza outlet operating to 5am? How does that sit with the drive of LBHF to improve the area, quieten noise, attract daytime businesses and footfall, and promote a clean green environment?

Two principal points are (1) that there is no plan generally or specifically within the LBHF to promote the night-time economy in the residential areas around NEC and the NE Road and (2) the Council is making great strides in improving North End Road during daytime hours through traffic calming measures such as 'parklets', wider pedestrian pavements, and improved facilities for market traders; the emphasis of these North End Road improvements is solely on daytime commercial activity. The night-time economy is not at all addressed in the Council's plans for North End Road, most likely because no one at the Council envisions NEC, North End Road, from Fulham Road up to Lillie Road and the NE Road beyond the A4, becoming a 'late night' or even all-night destination. Local councillors are on record as supporting this position. The late-night economy will fuel the delivery and emissions economies and residential London and right to a good night's sleep will be significantly impaired and effectively lost forever.

If the Licencing Sub-Committee is minded to grant a License at this time, we ask for it to be for no later than 24:00 so effectively I would ask you to reject this application. The precedent for this is the decision on 28 June to reject the application of Selekt Chicken, 349 NE Road (2022/00813).

As to conditions please be realistic:

- 1 dispatch drivers and other customers rarely read signs or notices;
- 2 will the CCTV camera cover indoor and outdoor activity? How many times have Pizza Pronto reported an incident to the police?
- 3 How many drivers can the premises accommodate? There is virtually no standing room for drivers. The owners will not want dispatch riders inside as this puts customers off coming in. Congregating outside the site is a public nuisance. The proposal is just not feasible given the space.
- 4 How will positive encouragement of quieter vehicles work? No incentive to do that, they neither care nor can enforce this – but can we have specific actions that the Applicant must demonstrate are effective? I am open to hear about the reality of what is being proposed – real, measurable, recordable conditions.

Best regards and thank you.

John Skoulding

From: John Skoulding
Sent: 23 August 2022 17:37
To: Dimitriou Maria: H&F
Cc: John Skoulding
Subject: RE: 2022/01153/LAPR: Pizza Pronto: 30 North End Crescent London W14 8TD - OBJECTION

Dear Maria

Many thanks for your email and for the confirmation regarding my representation.

Apologies for the delay in responding – I am currently away travelling and crossing time zones so am only reading emails intermittently.

My full address is Tournay Road, Fulham London SW6 7UF. However, I would stress that there are strong commonalities between all these applications in our area and areas of common interest to residents whether they are the immediately proximate or slightly less proximate. For example, the delivery/dispatch economy means that these businesses thrive on being able to deliver within a 20-minute radius from their site (as stressed in all their advertising). My road is easily within a 5-minute ride from this applicant's site let alone 10 or 20 so I would argue that we are all impacted by the by the services that they rely on to make and fulfil sales. Further, if hours are agreed, licences granted or conditions set or not for sites "close to" where I live then this sets a clear precedent which will impact residents and businesses closer to where I live and in particular businesses my then seek to argue that beneficial terms should apply/not be denied to them.

Thanks again for your email.

Best regards

John Skoulding

From: Charlotte Dexter
Sent: 19 August 2022 19:15
To: Dimitriou Maria: H&F
Cc: Licensing HF: H&F
Subject: 2022/01153/LAPR: Pizza Pronto: 30 North End Crescent London W14 8TD
Licence for the provision of Late Night Refreshment Outdoors

To: maria.dimitriou@lbhf.gov.uk
cc: Licensing@lbhf.gov.uk

Date: Aug 19, 2022

deadline 23:59 Fri 19 Aug

ref: **2022/01153/LAPR: Pizza Pronto: 30 North End Crescent London W14 8TD
requesting a Licence for the provision of Late Night Refreshment Outdoors**

Opening hours being applied for Mon, Tues, Wed 12:00 - 02:00; Thurs, Fri, Sat, Sun 12:00-05:00

Dear Licensing Officers, LBHF

I am opposed to this licensing application and respectfully submit that the Licensing Sub-Committee must seriously consider its appropriateness, for several reasons.
I reserve my right to comment further on this application.

Prevention of Crime; the first Licensing Objective

Operating illegally since 14 December 2021

This Premises sells pizza, as their name implies, at a quick pace, as the word 'pronto' implies. They deliver to a wide area, including my road.
Pizza Pronto on North End Crescent is just off the North End Road. Thousands of deliveries a week emanate from North End Road and its smaller offshoot backwaters, such as North End Crescent.

I understand that Pizza Pronto was granted a License for ONE YEAR, 2020/00925/LAPR for the Provision of Late Night Refreshment until 2am, granted by the LBHF Lic Sub-Committee, on 14 Dec 2020, expired on 13 Dec 2021, over eight months ago (today being 19 Aug).

I am very concerned that Pizza Pronto have taken a rather casual approach to the LBHF Licensing Policy and the 2003 Licensing Act, and, in fact, since 14 December 2021, they continue to operate and deliver until what was their Terminal Hour of 02:00 and sometimes even beyond this time. This concerns me greatly, as a resident who lives anywhere connected with the North End Road (North End Crescent is just off the North End Road); I live at the southern end of the North End Road.

I note that 2020/00925/LAPR is missing from the Licensing Register at this time, but understand that the Lic Authority is working on updating the Register with the correct decision history (not updated as of 19 Aug 2022). Apparently, this decision is recorded on the Agenda & Decisions archive for 14 December 2020.

What is still not clear: Why was Pizza Pronto granted a licence on 14 Dec 2020 for only one year? Had they been operating illegally before that date, for some time, and the Sub-Committee decided to give them a chance to prove themselves, thus granting one-year rather

than the usual 'forever' licence? I hope that the Sub-Committee is able to learn the full history and reasons behind the 14 Dec 2020 decision.

The facts are clear: Pizza Pronto has been operating since 14 December 2021, until at least 02:00 and sometimes later, without a License for 'Late Night Refreshment', or any licence, for that matter.

Definitions: I think that I understand correctly that such a Late Night Refreshment License is necessary for a Premises preparing and selling hot food, using the terminology of either 'Indoors' or 'Outdoors' (similar to 'on the Premises' or 'off the Premises' when referring to alcohol licenses—which we are not referring to here), between any of the the hours between 23:00 and 05:00 (those hours to be granted by the LBHF Lic Authority) I also understand that more recently Pizza Pronto has been operating until 00:00 (midnight) but perhaps later—apparently since making this Application being considered now, namely 2022/01153/LAPR.

They need a licence to serve Late Night Refreshment, for any hours after 23:00. They don't have one.

They are preparing food and delivering after 23:00; they might be serving food indoors, after 23:00, at the 4 spaces mentioned in the Application.

This means that they are operating illegally, and have been, since their one-year licence expired on 13 December 2021.

How could the Sub-Committee entertain the granting of a Late Night Refreshment Licence to a Premises that clearly does not take the law and obligations of a Premises seriously? It could be that the Applicant is still unaware of the licensing law, even though he is the Applicant and it sounds like he runs the business. He has filled out applications, now twice (maybe even more if we learn the full history), and surely he has at least read the LBHF Licensing Policy and perhaps taken a course, as well as a refresher course to familiarize himself with his obligations under the 2003 Lic Act. There are also online trainings and a wealth of knowledge out there on the net.

Would it be possible for the Licencing Sub-Committee to consider suggesting to the Premises that they need to roll back to the Terminal Hour of 23:15 (thus stopping all deliveries by 22:45), for at least a year or more to prove to the Council that Pizza Pronto are a serious business that wish to start working within the law. It would help to make things very clear if the opening hour were also stated clearly, perhaps for his requested 12:00? In other words, not from 05:00.

Why no enforcement?

I am very concerned that neither the Responsible Authority the Licensing Authority nor the Responsible Authority the Metropolitan Licensing Police have not properly enforced this crime of operating without the correct licence and in fact operating without any licence.

I am also confused by what I believe is a very concerning lack of due diligence regarding this application. The history is important but it is missing and only came to light almost by chance.

North End Road redevelopment and opening/closing hours envisioned:

I understand and greet the fact that North End Road is being redeveloped and enhanced, with great effort by the Council, to support the daytime historic street market and shops/medical services/other daily services/cafes/eateries economy, and an early evening restaurant/cafe scene up and down this important artery/long road in our borough; the Council's vision is not to develop a Night Time Economy along the North End Road and environs. This was emphasised very clearly by the Deputy Leader, speaking in his role as Councillor on

behalf of his Lillie Ward, only a few weeks ago at a Licensing Hearing on 27 July regarding a similar Application on North End Road.

I am glad that the Sub-Committee had the opportunity to hear the explanation of intent regarding North End Road and environs, by Councillor Coleman.

Of course, neither should we compare that application with this application, nor draw specific conclusions from one licensing application to the other; each application must be considered on its own merits, or lack thereof.

Operating illegally has consequences; as well, offenses under the 2003 Licensing Act

Under the Licensing Act, "It is an offence for anyone knowingly or recklessly to make a false statement in connection with a Licence Application. The maximum fine on summary conviction is unlimited." This is stated directly in the blue notice that the Applicant himself/herself, must post on his Premises window for those who know to look out for such, and it is noted in the advertisement that they must submit to a local print newspaper; as well it is on the Application and the signature of the Application acknowledges it when signing.

The Application gives the impression that this is a new Premises or a Premises that has only been operating until 23:00 and so until making this 'new' Application it did NOT need a Late Night Refreshment License. This is not the truth. In actual fact, the Premises has been operating as clearly set out above in my opening paragraphs, first with a one-year Licence, since 12 December 2020, but since 14 December 2021 until 02:00, without any licence. One might conclude that the Licence lapsed and a new one was not applied for. I also now read in the former application of 2020 that the owner mentions he had been in business already for 10 years; it is unclear what the hours were during those 10 years, ie was he serving or delivering after 23:00?

I am not an expert, and the Licensing Sub-Committee will surely know better than I do, but clearly the 2003 Act sets out various offenses regarding operating without a licence: I quote Part 7,

Part 7

Offences

Unauthorised licensable activities

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Unauthorised licensable activities

(1)

A person commits an offence if—

(a)

he carries on or attempts to carry on a licensable activity on or from any premises otherwise than under and in accordance with an authorisation, or

(b)

he knowingly allows a licensable activity to be so carried on

My sense is that Pizza Pronto has yet to embrace the severity of the unauthorized licensable activities that they have undertaken for the past 8 months.

Conclusion:

I suggest that the Application must be rejected by the LBHF Licensing Sub-Committee and clear guidelines set out by the Lic Authority for Pizza Pronto, as far as that is legally allowed (probably not unless the hour is after 23:00) regarding hours to work within to prove that Pizza Pronto is ready to work within the law, rather than be a law unto itself.

If a licence is granted:

As is always the case, we are obliged to mention the following; should the Sub-Committee decide to grant a License to this operator who has undertaken unauthorized licensable activities for over eight months, could they please take into consideration the following:

The Applicant is applying for Mon, Tues, Wed 12:00 - 02:00; Thurs, Fri, Sat, Sun 12:00-05:00

1) 'Day creep'—

it seems that Thursday, has become the new Friday, with regard to hours granted on licenses. Thursday is a school night, just as are Sunday, Monday, Tuesday and Wednesday. Thursday should not be lumped in with Friday and Saturday, ie for which the Sub-Committee sometimes grants later, specific hours for, Friday and Saturday.

The Applicant is applying for 5am on Thurs, Fri, Sat, Sun.

Could the Sub-Comm please consider latest 23:15 on Fri and Sat only and 23:00 on Sun, Mon, Tues, Wed, Thurs.

If I understand things correctly, a License for Late Night Refreshment (hot food only) is only granted and Conditions only set if the License is for time after 23:00.

2) Protecting children from Harm; the fourth Licensing Objective and Prevention of Noise and Nuisance, the third Lic Obj

'Hours creep':

The Application is asking for 2am on Mon, Tues, Wed and 5am on Thurs, Fri, Sat and Sun.

Why is there so much concern about later and later hours, so-called 'hours creep', for hot food providers, ie after 23:00, near any part of the long North End Road? Mainly because the North End Road, with small roads around it like North End Crescent, has residential dwellings above shops, beside shops, sometimes even underneath shops, around shops and everywhere; a very large Samuel Lewis Trust estate is right across from this Premises address; hundreds of children in there trying to get a good night's sleep for next day's school time.

The Delivery Economy is changing our mainly residents roads dramatically, most residents believe for the worse, with many vehicle accidents and even deaths, as we see in the media all too often. Delivery drivers have one goal; pushing the 'sale completed' button on their handset as quickly as possible—this means driving at great speed, driving dangerously, driving on pavements, jumping or using cycle-only pathways, creating rat-runs, jumping traffic lights where there are no enforcement cameras, helped by Google Maps and the Waze app, of course; and let's remember that 98 percent of these sales runs are through 100 percent residential roads.

Being awoken by noisy delivery scooters, door bells ringing/ delivery guys banging and knocking to get attention for that final sale button to be pushed by the delivery driver, electronic beeps, doors shutting, arguments between recipient and driver etc... being awoken unnecessarily can cause psychological harm to children (and adults for that matter!). Sleep deprivation is harmful. It is also pure and simple noise nuisance.

Again, could the Sub-Comm please consider latest 23:15 on Fri and Sat only and 23:00 on Sun, Mon, Tues, Wed, Thurs.

3) Public Safety; the second Lic Obj:

CCTV cameras. The applicant mentions one and we wonder if more are not needed. The entire area up around his shop is famous for unfortunate things like drug dealing. Surely more CCTV should be in place to protect the shop and the employees and to be able to cooperate with the Police and the Council at all times as a lot happens there and a lot passes by there.

4) further considerations—

The Applicant mentions that he has 'a small seating area suitable for 4 people' but that he will have a sign up for 'no collections' by which I assume he means 'only collections by designated drivers; please order online for delivery to your residence or business address'. Is that correct?

The Applicant has NOT applied for 'Indoors' in his Application Operating Schedule. Also, because I just now 16:00 Fri 19th Aug) have sight of the previous application, I see that Pizza Pronto was allowing 'collections' until 21:30, so could the Sub-Committee ascertain if that has actually changed?

In short, no more collections by the public at any time?

No one will be coming in to eat indoors at the 'small seating area suitable for 4 people'?

If the Applicant plans on a few people being allowed to come inside to eat, where do they order, in store or technically by phone? He needs to add to his application the words 'Indoors', correct?

From what I can ascertain, customers planning to eat inside certainly would not order online because this shop does not have its own ordering system; it only has online/app orders through Deliveroo, UberEats and JustEat. Were a customer to order online or on an app, and come in store to sit down and eat, this would cost the shop 30 percent of the order price, or even more. Perhaps the Applicant still takes credit card payments, or cash payments for such situations?

Is he serving food to some customers who actually come into his shop, or not (this would be 'Indoors' in Late Night Refreshment (hot food only) Licensing parlance)? The Application **2022/01153/LAPR** in the Licensing Register, under Additional Information, states:

"New premises licence for a takeaway fast food shop. Licensable activities sought Late night refreshment - outdoors Mondays- Wednesdays from 23:00--2:00 Thursdays-Sundays 23:00-05:00 Proposed opening hours Mondays- Wednesdays from 23:00--2:00 Thursdays-Sundays from 23:00-05:00"

I find the word 'takeaway' to be confusing in this context. Takeaway by whom? Traditionally, 'takeaway' refers to a customer placing an order and going physically to the shop to collect the food, or sometimes takeaway offered delivery as well. Traditionally, delivery refers to a customer placing an order and paying for that order in advance directly to the shop, via credit card, and someone else delivering that order to the customer. Long ago, delivery drivers collected cash for payment but that was very high risk. Times have moved on.

The hybrid now is that the order as well as the sale and the delivery are actually transacted via The Third Party Economy through third-party companies such as Deliveroo, UberEats and Just Eats. A shop contracts out just about all its contractual obligations with a customer to a third party.

The customer opens his Deliveroo app on his phone and places an order for a pizza from Pizza Pronto (in the background, the customer's address and credit card details are verified and live/ ready to be used by the Deliveroo app and its network).

The Deliveroo processing terminal in the Pizza Pronto shop rolls out this customer's order on a screen or on a paper receipt. The pizza is prepared/cooked/packaged up and, almost by magic, a Deliveroo driver appears 'just in time' for that very order, to wiz the pizza as quickly as poss to the customer's residential or business address. When the order is handed over to the customer, and the customer signs his signature on the driver's phone/ tablet or interface/gadget, the sale is finally complete and the credit card transaction takes place. The sale no longer takes place in the Premises; much to consider here regarding the Premises elongating itself through the physical journey of the sale down through residential roads, in the

hands of a third party who has taken over some, most or all of the licensing obligations of the Premises.

--Should drivers be allowed inside to sit at these four seats or not? Is this even allowed due to health and safety (rather soiled clothing is a given, for instance)?

Could that please be stipulated in Conditions so that it is clear to everyone and should he put up signs to explain this clearly to drivers? "Drivers wait at door only" Or "No drivers to sit down", or "Seating is for drivers only"

5) Prevention of Nuisance:the third Lic Obj

--Clearing litter in front of his shop. It is helpful if this is a condition set out to be done quickly a few times a day. It was mentioned in the first application round of 2020 (which I just was able to find online this afternoon 19 Aug 2022) as a big problem in front of this shop and the area around the shop. A helpful Condition, and log book for the same, could go a long way to improving the litter situation.

—only delivering to a known residential or business address. This has now become a condition in the pool of conditions, I believe. Could this please be conditioned to avoid nuisance in parks, at bus stands, in alleyways and other unaddressed places where people gather for good or other intentions.

—only silent bicycles or silent electric two-wheelers to avoid causing 'emissions nuisance', AT ANY TIME, at all hours of delivery. This would go a long way in supporting LBHF's year 2030 visions and zero emissions goals.

Thank you for your attention to my concerns,

Charlotte Dexter
Barclay Road
London SW6 1EJ

From: Andy Clarke
Sent: 18 August 2022 19:19
To: Licensing HF: H&F
Cc: Overton Adrian: H&F
Subject: Pizza Pronto (2022/01153/LAPR) letter of objection

2022/01153/LAPR
Licensing Act - Premises Licence
Pizza Pronto, 30 North End Crescent, London W14 8TD

We are writing to you to object to the above licensing application. We were unable to submit these objections through your online portal because they were over the 5000 character limit. We would be grateful if you could acknowledge receipt of this letter of objection. Please do not hesitate to contact us if you have any questions.

Regards,
Andrew Clarke and Grethe Mitchell
Edith Villas
London
W14 9AB

CURRENT LETTER OF OBJECTION (2022/01153/LAPR)

We are residents of Edith Villas, a residential street very close to Pizza Pronto, and are **writing to you to object to the above licencing application**. This is the second time within two years that we have had to object to a licencing application for this property (Pizza Pronto). We wrote to you previously regarding their application 2020/00925/LAPR (which was granted with a time limit and other constraints).

For ease of reference, we have included our previous letter of objection below. For the avoidance of doubt, please note that these previous objections still stand and should therefore be included when considering the current licencing application. In addition, we have expanded on some points and added further objections. We would also like to highlight, with some concern, that we were not notified automatically of this application – either as local residents or as objectors to a previous application at the same address.

We are likewise concerned that the previous (2020) licencing application is not included on the “related record” tab when viewing the current (2022) application in your licencing portal. In addition, it is not possible to find this previous licencing application when searching by postcode, address, or even by the licencing reference number itself.

Please explain why the previous licencing application is not linked or searchable from the portal. We are concerned that this causes a lack of transparency and accountability as it prevents local residents who are concerned about the current licencing application from seeing the full application history of the property and the previous constraints applied to it. We are likewise concerned that it is happening to other applications within the system.

Our objections to the above application are detailed below and in our letter of objection to the previous application (which is included below and which also forms part of our objections in this letter).

The decision letter for the previous application restricted opening hours to 11pm and allowed extended opening (to 2am) on Friday, Saturday and Sunday only. These extended hours were restricted to delivery riders only (no walk-in/over the counter service) and further restrictions were placed on the licence, such as requiring the use of electric delivery bikes only. The licence for the extended hours was granted for one year only.

The extension being requested is excessive (too long and over too many days) and will cause substantial disruption to local residents. Moreover, it is inappropriate – particularly in a high-density residential area – for the current application to treat 2am as normal opening hours,

rather than an exceptional late-night extension for the weekend. As we understand it, the application also omits the current restriction that service after 11pm is to delivery riders only – as local residents, we object to this and to the addition of outdoor refreshment.

We object to the application and to removing this restriction on the following grounds: noise, crime, anti-social behaviour, increased waste and disruption to a residential area. A late-night fast-food outlet will encourage all of the above and with current cuts in resources, crime and complaints about noise and anti-social behaviour cannot be adequately policed by LBHF and/or the Metropolitan Police.

We therefore urge the licencing committee to refuse this application.

Noise

Pizza Pronto is situated in a high-density residential area that is already vulnerable to noise from existing outlets and shops, and from traffic that uses North End Crescent, North End Road and surrounding area as a rat run. Allowing late-night activity at Pizza Pronto for 4 nights of the week will dramatically increase the noise levels in the area as it will attract cars, motorbikes, scooters and groups of people to the locality.

Whilst there may be a place for the “late-night economy” in city centres, it is inappropriate for a residential neighbourhood such as the location of Pizza Pronto. Allowing an extension to 5am would mean that the opening hours at the weekend will, within the space of two years, have been extended by 6 hours (from 11pm until 5am).

We also object to Sunday being included in the weekend as late-night activity and noise on Sunday disrupts residents and their children who need to be at work and school on Mondays. We also note, with some concern, that Thursday is now being treated in this (and other) licencing applications as part of the weekend – as this ignores the adverse impact that extending the “weekend” will have on local residents who also have to go to school and work the next day.

The current application seems to seek a licence to provide outdoor refreshment. As local residents, we insist that this is refused completely – as it will exacerbate any problems with noise disruption and the late-night loitering that goes hand in hand with anti-social behaviour.

Crime and anti-social behaviour

A late opening fast-food outlet will encourage loitering, crime and the consumption of alcohol in public spaces (streets and pavements) of this residential neighbourhood. The area already has a drug-dealing problem with North End Crescent (including the council properties and their grounds, surrounding alleyways and passages, and the area around the library) being an area where dealers and their clients congregate and meet up. The provision of late-night fast-food in this area will provide a magnet for drug-dealing and drug-buying. A late-night fast-food outlet will also encourage consumption of alcohol out on the street late at night, with associated anti-social behaviour (aggression and loud raucous behaviour, litter, urinating etc). Rough sleepers (already a problem in the ward) will be attracted to the area.

A further extension to 5am (on four days of the week) is excessive and will only contribute further to the problems mentioned above (noise, crime, anti-social behaviour, increased waste).

Waste

Fast-food outlets generate a lot of increased waste both in terms of litter (from customers) and in terms of an attraction of vermin. These place additional strain on hard-stretched council resources in terms of cleaning and eradication. The increase of litter and vermin also contribute to downgrading and further disrupting this residential neighbourhood.

Concentration of fast-food outlets and delivery-only business

In my previous email, we highlighted the high concentration of fast-food takeaways in this area – which includes two other pizza takeaways (Domino’s and Fresh Pizza) within 150m radius of Pizza Pronto. There are a further two a short distance down North End Road. Restaurant outlets are also planned for the Olympia development.

Given the concentration of fast-food takeaways in the local area, I am concerned that granting any late-night licence to Pizza Pronto would create a precedent and that other establishments in the area would want (and have grounds) to follow suit.

A takeaway restaurant which is operating as a viable ongoing business and generating sufficient “over the counter” trade should not require such substantially extended operating hours.

Our concern is that Pizza Pronto is not seeking to operate as a bona-fide neighbourhood restaurant, but is instead seeking to extend its hours so as to operate as a predominantly take-out outlet for transient trade and deliveries, which is open at all hours. This type of activity is evidently inappropriate for a residential neighbourhood – for the reasons already explained above.

There is also the additional concern that Pizza Pronto is moving towards being a “dark kitchen” which will focus predominantly on delivery orders through the night for its business.

A “dark kitchen” has no need to operate out of a quiet residential street as the deliveries could be done from anywhere. For instance, the nearby Domino’s closes at 11pm and does all of its deliveries out of Shepherd’s Bush branch. It may therefore be that Pizza Pronto is merely capitalising on the locality (a side street where it is easy to park vehicles) to increase their late-night deliveries and transient trade at the expense of the well-being of residents – instead of being a genuine neighbourhood restaurant.

If that is the case, and Pizza Pronto operates predominantly as a “dark kitchen”, there is no need for the owners to worry about its external appearance or its relationship with nearby residents and the neighbourhood – as it relies on remote customers who order online without seeing (or being bothered by) the actual establishment. The local residents will have the disruption of delivery riders/drivers without the benefit of a pleasant local restaurant that contributes positively to the urban landscape.

The proposed opening hours (to 5am) makes it a relatively small step to 24-hour operation – something that all local residents are likely to vehemently oppose.

We would also strongly urge the licencing committee to refuse the extension in its entirety, rather than regarding an extension to (say) 2am as being an acceptable compromise. Any compromise solution should take into consideration the disruption to local residents in terms of noise, anti-social behaviour, increased waste and crime – and the possibility that the application asked for 5am in the hope that a compromise like 2am would then be accepted.

Disruption caused by delivery riders

The number of delivery riders has grown exponentially since the previous licencing application – and so has the disruption caused by them. This has exacerbated many of the points made in my original letter of objection (included below).

Although the number of delivery orders has grown, so has the number of riders/drivers, and these are now competing more aggressively for orders and delivery time. It is now common to see scores of delivery riders parked outside (or near to) a takeaway restaurant so that they can be the first in line when an order comes in (the delivery matching software seems to prioritise riders who can collect the quickest which favours those loitering outside). These communities of waiting riders seem to develop their own social scene based on shared language, background, or circumstances.

If Pizza Pronto is one of the few local takeaways still taking delivery orders between midnight and 5am, it will naturally become one of these “congregation spots” – and this is inappropriate in a quiet residential street as it will cause a substantial late-night disruption to local residents. In our original letter of objection, we also mentioned the danger of delivery riders taking illegal shortcuts and riding in a way which is a danger to pedestrians. This danger has also grown substantially since 2020. We have seen a substantial increase in the number of delivery riders (both on mopeds and electric bikes) who are using the Edith Villas cul de sac as a shortcut to West Cromwell Road – they ride to the end of the cul de sac, then go up the kerb and over the pavement to reach Cromwell Road as this allows them to miss out the traffic light at the junction of North End Road. The mopeds will then ride along Cromwell Road, but most electric bikes will use the narrow pavement which leads over the railway bridge to Tesco (Warwick

Road). The number of electric delivery bikes taking this route (and the speed that they travel) has made pavements in the area a significant danger to pedestrians.

The following account by one of us (Andrew Clarke) highlights the problem:

On one occasion, I was hit by a delivery rider riding on the pavement taking this route – and can therefore offer a first-hand account of how difficult it is to make a complaint about a hit-and-run incident and how untraceable and unaccountable these riders are. I was walking back from Tescos in the early evening when I was hit by a delivery rider riding at full speed on the pavement. They did not stop, but I had a record of the location, time and company so I made a complaint about dangerous riding. Although I provided the time/location of the incident, they first wanted the name and ID of the rider involved – and I naturally did not have this as it was a hit-and-run incident. I pursued the complaint further, but was told that they did not have any logged in riders in the location at the time – even though they were in Deliveroo livery and clearly riding quickly to/from a delivery.

The previous licencing application placed operating restrictions on the licence including the use of electric bikes only. It is unclear what is done to confirm or enforce this rule (or whether it can be enforced) – particularly as local residents (and presumably the council) will not know which riders in the nearby area are travelling to/from this takeaway or be able to identify individual riders by name/ID (or company, if they are riding an unmarked/hired scooter and not using a branded bag/jacket).

Accountability of "Pizza Pronto" business

In our previous licencing application, we highlighted the “revolving door” of ownership of this business – with the corresponding lack of transparency of ownership and accountability – and this seems to have continued.

A search of Companies House reveals that, in recent years, there have been at least six companies registered at the Pizza Pronto address (30 North End Crescent): Pizza Pronto (Kensington) Limited (09667856); Gandhi Foods Ltd (10651754); Pizza Pronto (Hammersmith) Limited (10328179); Pronto Pizza (Hammersmith) Limited (11476050); Tacoland Limited (13876569); and Pronto Pizza W14 Ltd (14016677). In addition, there may have been others companies involved in the Pizza Pronto business which were not registered at the address.

Pronto Pizza (Hammersmith) Limited (11476050) was dissolved in 24/12/19 and the two most recent companies at this address have only recently been incorporated: Tacoland Limited (13876569) was set up in 27/1/22 and Pronto Pizza W14 Ltd (14016677) was set up on 31/3/22. As a result, it is unclear who was operating the Pizza Pronto business between 24/12/19 and the current date – and which (if any) of the two current limited companies would be legally responsible for the business going forward.

There is no explanation for the high turnover of ownership and companies for what is a small and straightforward pizza takeaway. I am very concerned that the licence application is being made in the name of one business – and then, once granted, will be transferred to another with no track record in this local area.

PREVIOUS LETTER OF OBJECTION (2020/00925/LAPR)

Licensing Act - Premises Licence 2020/00925/LAPR

Premises: Pizza Pronto 30 North End Crescent London W14 8TD

Received: 15/10/2020

Validated: 20/10/2020

Applicant: Mr Zahid Zaheer

30 North End Crescent

London

W14 8TD

Details: New premises licence

We are a local residents who live in Edith Villas, a residential street only a few hundred metres from the Pizza Pronto. We are writing to object to the above application for a new premises licence.

We are making our objection on four main grounds. These are:

1. The impact on the surrounding residential area
2. The impact on other restaurants
3. The disruption caused by delivery riders
4. The accountability of the takeaway owners and the sustainability of the business

Impact on a residential area

As a general rule, we believe that the council should not grant licences for late night delivery to fast food outlets based in residential areas. If someone is ordering a pizza at 2am, it can come from any location - the business does not have to be in a residential area as it could come from an industrial or commercial centre just as easily. For instance, the Domino's Pizza in North End Parade closes at 11pm and late deliveries to this area are covered by their Shepherd's Bush branch (which delivers to 2am only from Friday to Sunday).

We are also concerned that granting a late night licence for deliveries from this takeaway outlet will create a precedent that others nearby will wish to follow. The number of takeaway outlets in this residential area is already too high. In addition to the applicant (Pizza Pronto), there are at least four other takeaway outlets within a five minute walk (Domino's Pizza, Chicken Shack, Fresh Pizza, Chicken Cottage). I am very concerned about the disruption to this residential area if they all start late night delivery.

Takeaway outlets contribute to an increase in street litter and waste, as well as to an increase in noise from delivery drivers. Given the already high incidence of takeaway outlets in this area, there does not appear to be any justification for increasing the trading hours.

Moreover, it seems unlikely that the council will be able to enforce at all times the rule that only delivery drivers will be catered for after 11pm. It therefore seems likely that there will be an increase in vehicle traffic and an increase in people congregating outside once it becomes known that takeaway is available from the premises until 2am. This late night activity will adversely impact on the character and quality of life of this residential neighbourhood.

Impact on other restaurants

Takeaway outlets adversely impact on table service restaurants. I believe that the local council has a moral obligation to ensure the survival of these sit-down restaurants which form the heart of the local community and they should not be sacrificed in favour of takeaway outlets. The situation has been exacerbated by COVID which has had a severe impact on the hospitality industry, particularly restaurants which rely upon table service rather than takeaway trade. COVID restrictions have allowed takeaway outlets to thrive. I believe that the council should maintain a "level playing field" and should not allow takeaway outlets to expand their operations while sit-down restaurants in the same area are struggling.

Disruption caused by delivery riders

The current level of deliveries already causes disruption to local residents. We live in Edith Villas, a nearby cul de sac, and regularly have delivery riders which speed along this street and drive up and over the pavement onto West Cromwell Road - using it as a shortcut to avoid the traffic lights at the junction of West Cromwell Road and North End Road.

It is common for these fast food outlets to operate a number of their own delivery riders (in addition to those from Deliveroo, Uber Eats, etc). When the restaurant is closed, these will be parked outside or nearby and this is becoming a serious issue in the area (where parking is very limited) as an increasing number of resident's parking spaces are taken up by these mopeds.

The Domino's Pizza in North End Road has at least a dozen mopeds outside its doors, which occupies the space of two or three cars. The smaller takeaways, such as Pizza Pronto, may only operate a couple of mopeds, but these are often parked with no consideration for other residents so that they reserve for the maximum space outside for when the takeaway is open.

There is a widespread issue with the disruption caused by delivery drivers congregating near busy restaurants and a number of councils both within London and outside the capital have taken steps to crack down on this. This is particularly an issue in residential areas.

<https://inews.co.uk/news/uk/westminster-council-threatens-crackdown-delivery-app-drivers-109912>

We understand that the issue arises when a restaurant accepts orders from delivery services (Uber Eats, etc) which are beyond its capacity. Riders will arrive when the order is placed, but then have to wait outside for the food to be ready. This can lead to large crowds of delivery riders congregating in the street. I am concerned this this will occur outside Pizza Pronto as it is a small takeaway and will, if this licence is granted, be one of the few that is open at 2am. We do not think that there is any benefit in limiting the licence to deliveries on cycles or electric scooters. As I outline above, the issues is not just with the noise of the delivery vehicles - it is also from delivery drivers congregating in the area. In addition, the riders of cycles and electric vehicles (particularly scooters) are more inclined than mopeds take shortcuts on the pavement and this leads to an increased danger to pedestrians.

Accountability and sustainability of "Pizza Pronto"

A cursory search of details for this takeaway outlet suggests that there has been a "revolving door" of ownership which appears to have involved at least four limited companies in the space of four years. This does not bode well for the sustainability of the business or the transparency and accountability of its management.

Originally "Pizza Pronto (Kensington) Limited" was registered at this address (30 North End Crescent). However, this company was dissolved in December 2017. A second company - "Gandhi Foods Ltd" - was set up at this address for an overlapping period (incorporated March 2017 and dissolved August 2018). Following this, a third company - "Pizza Pronto (Hammersmith) Limited" - was set up with its offices at this address. This was incorporated in July 2018, and so overlaps briefly with "Gandhi Foods Ltd". As "Pizza Pronto (Hammersmith) Limited" was dissolved in December 2019, it is unclear who currently owns and operates this takeaway outlet.

It is also unclear why the ownership of this takeaway has changed so frequently, but this is something that the licencing committee may wish to look into - or take into consideration when making their decision about the current application.

Andrew Clarke and Grethe Mitchell
Edith Villas
London
W14 9AB