

## Public Health Cumulative Impact Assessment

### Summary

The Public Health evidence contained in this report supports the principle that there are alcohol harms linked to the density of off licenced premises in

- Chatham High Street area
- Gillingham High Street area
- Luton Road area
- Rochester High Street

Off licensed premises are the single most common type of licensed premises Medway Council Licensing Department has recorded. These are mostly small community, convenience, and newsagent type shops. As can be seen from the maps in this report, while they are generally scattered throughout Medway, there is a noticeable density following the corridor from Strood in the west through Rochester, Chatham and into Gillingham in the east, with another cluster around Luton and Wayfield and Chatham Central wards.

All the areas highlighted above have high levels of deprivation<sup>1</sup>, which has been shown to have a clear link to alcohol related crime in a study carried out in 2014 in Medway<sup>2</sup>. There are also other studies which support this link, particularly in premises density and rates of domestic abuse<sup>3</sup>. Medway ranks in the most deprived 10% of local authorities nationally for crime deprivation<sup>1</sup>.

These areas above show the highest rates of hospital admission episodes for alcohol, and they also have the highest rates of health deprivation <sup>1</sup>. Overall Medway is one of the most deprived areas in the country for health, with seven areas in the top 10% most deprived nationally for health and 20 further areas in the top 20% most deprived nationally<sup>1</sup>.

Public alcohol harms, such as street drinking, litter, public urination and defecation and co-located public drug use is visible throughout the areas above and have been witnessed by public health staff on numerous occasions. These harms have also been seen and described by residents in comments submitted to public health.

Alcohol related anti-social behaviour, such as street drinking and associated behaviour, in these areas has been recognised as an issue through the recent consultation and agreement to cover Chatham, Rochester and Gillingham by Public Spaces Protection Orders to control drinking alcohol in public areas.

## Introduction

This report will outline the continuing cumulative impact of alcohol related harms in the following areas which are currently covered by a cumulative impact policy

- Chatham High Street (Appendix A)
- Gillingham High St/Canterbury St area (Appendix B)
- Luton Road/Chatham Central area (Appendix C)
- Rochester High Street (Appendix D)

2020 into 2021 was a difficult year due to the COVID 19 pandemic and this has had an effect on monitoring and evidence gathering of alcohol related harms in and around the public space in Medway due to the redeployment of public health staff and restricted working conditions.

## Medway overview

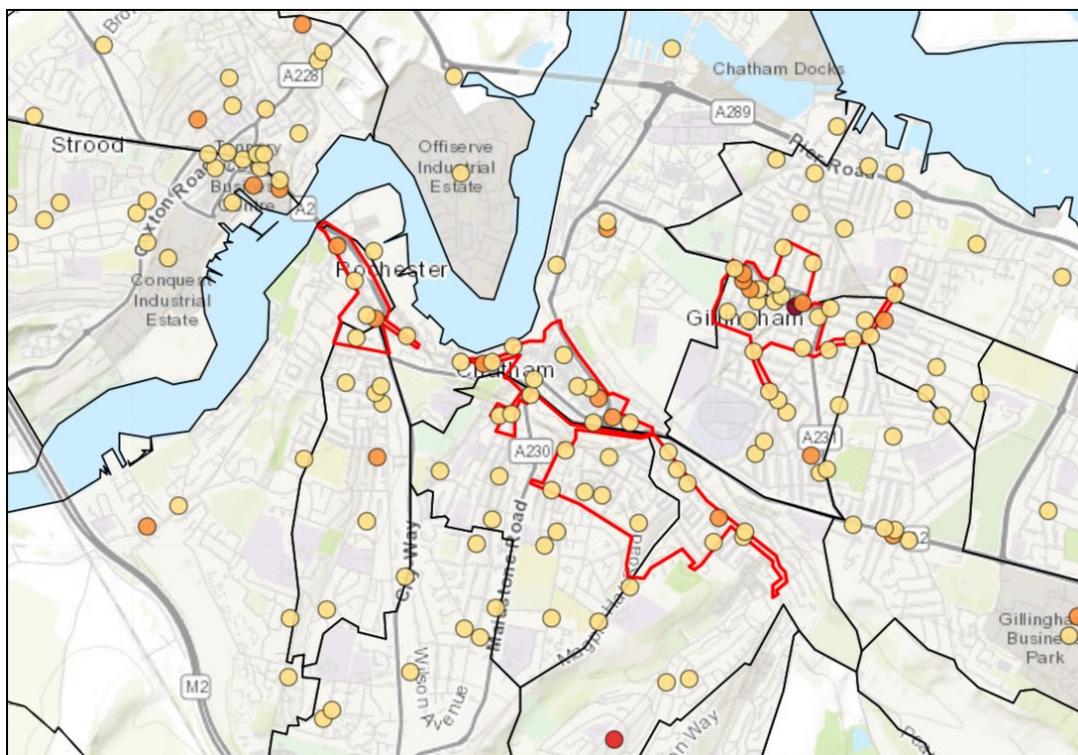
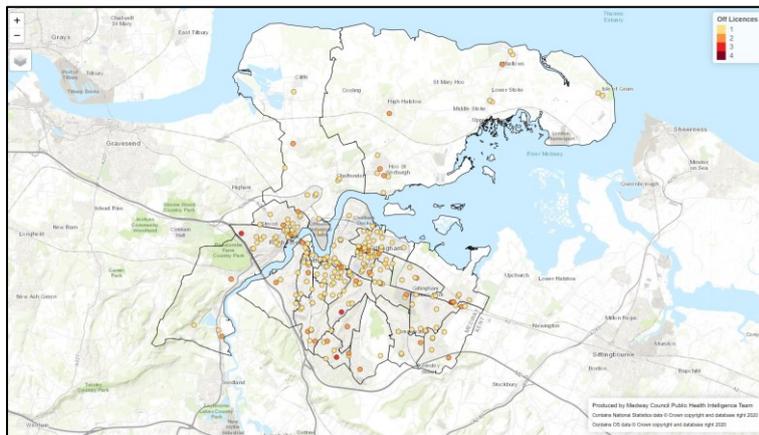
Medway Licensing Department has 800 premises listed as having a premises licence granted under the Licensing Act 2003 for the supply of alcohol, regulated entertainment and the provision of hot food and drink between 2300 hours and 0500 hours.

Of these

- 278 are operating as solely off licenced premises.
- 127 operating as public houses
- 184 operating as restaurants and takeaways
- 51 Club Premises Certificates
- 160 other

The single largest 'type' of licenced premises in Medway are 'off' licenced premises, most of which are small convenience/newsagents/corner shops, followed by public houses and restaurants.

## Off licences premises



## Off licences

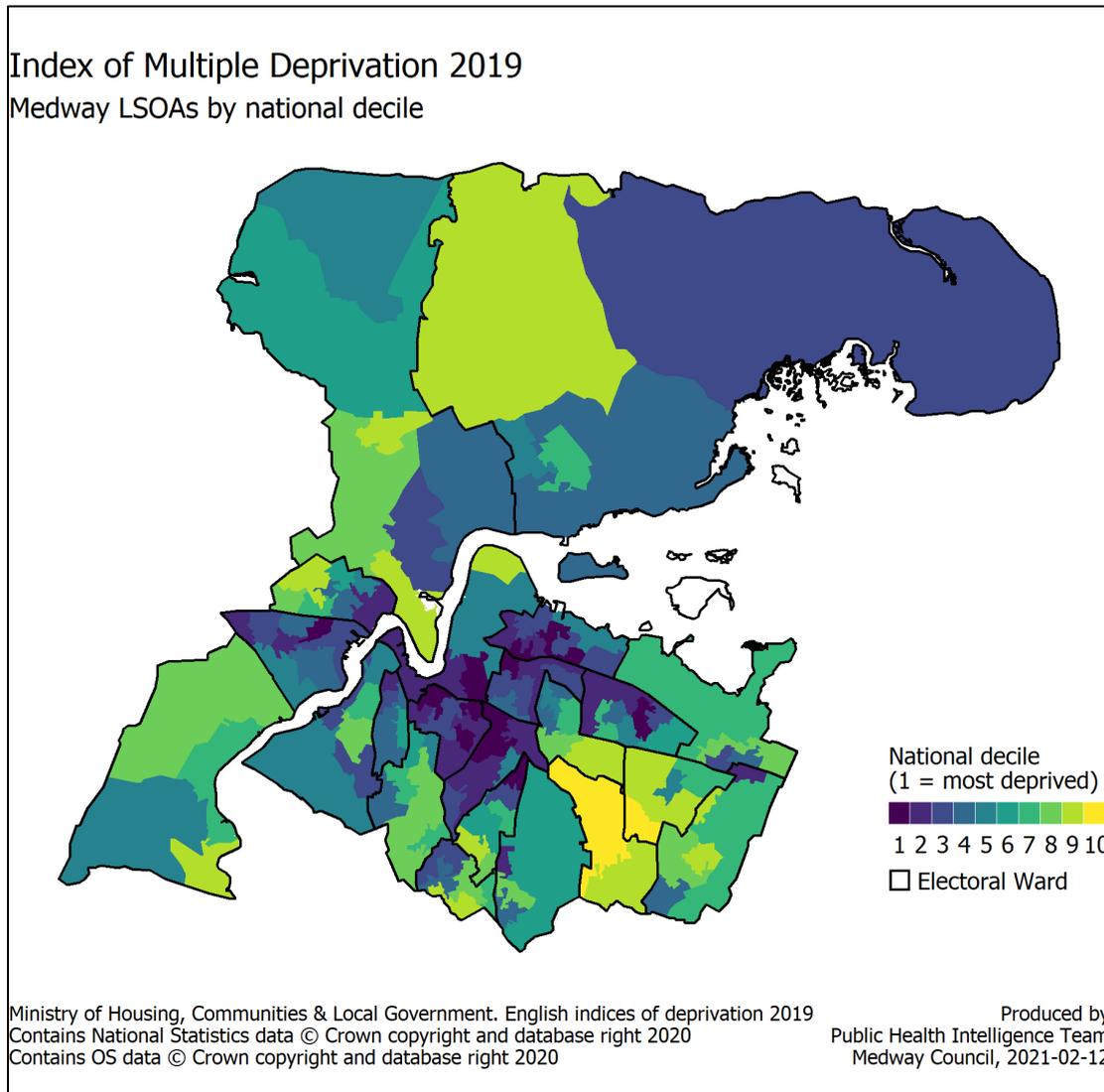
The areas where there are clusters of off licences are:

- Gillingham High Street into Canterbury Street and Gillingham Road area, which covers parts of both Gillingham North and South wards
- Chatham High Street and surrounding area, which covers parts of both River and Chatham Central wards
- Luton Road and surrounding area, which covers parts of both Luton and Wayfield and Chatham Central wards

Rochester High Street and surrounding areas, which covers parts of Rochester East and River wards.

- Strood High Street, which covers parts of Strood South and North wards

### Indices of Multiple Deprivation



The below is taken from the Medway Authority Monitoring Report 2019<sup>1</sup>.

*'The Indices of Deprivation consist of the following seven themes: Income, employment, education, health, crime, barriers to housing & services and the living environment.'*

**Medway is ranked in the 30% most deprived local authorities nationally in the 2019 Indices of Deprivation (IoD). In 2015 it was ranked in the 37% of most deprived local authorities nationally (bold added).**

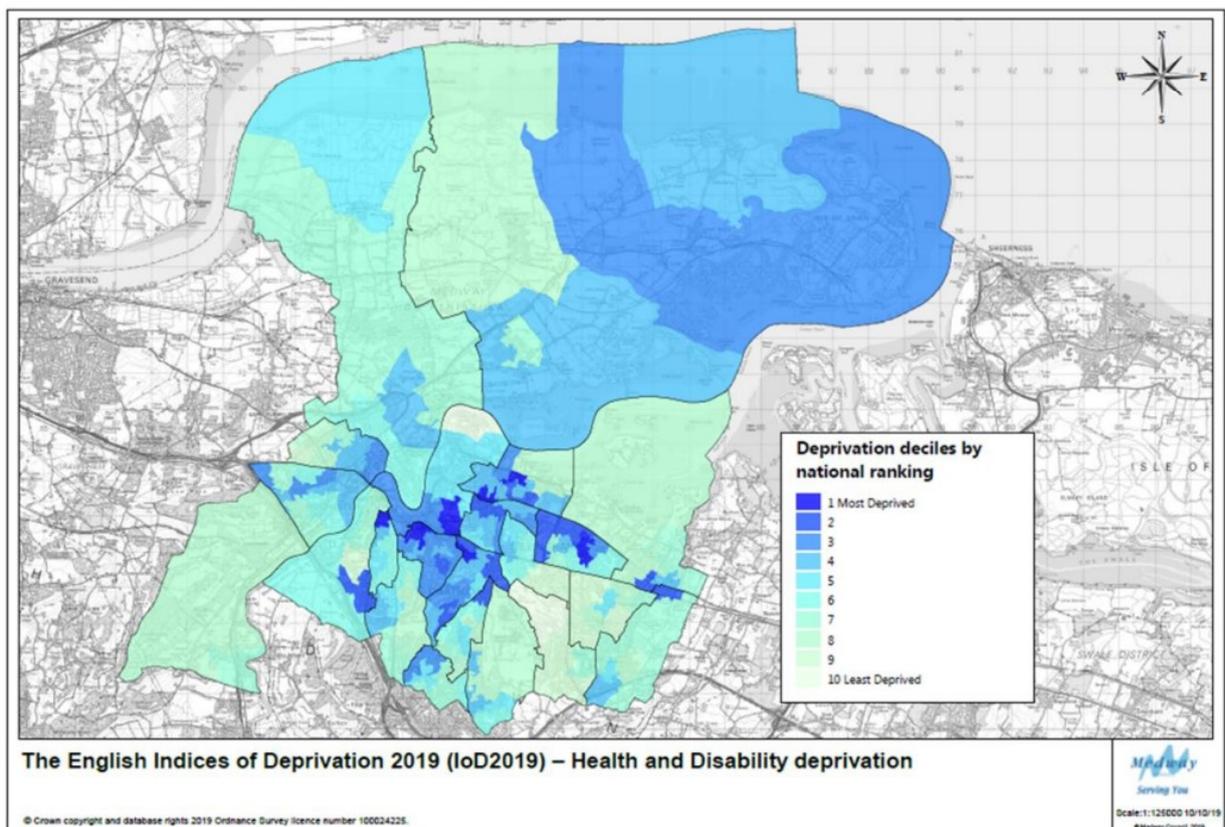
Medway is ranked 93rd most deprived local authority of 317 in England in the latest indices.

Medway now has fourteen neighbourhoods ranked in the 10% most deprived and thirty-seven in the 20% most deprived nationally.

**Medway appears to fair worst in the crime domain, ranking in the most deprived 10% of local authorities nationally for crime.**

Medway has an additional two areas in the most deprived 10% nationally and another five in the most deprived 20% nationally since the IoD 2015<sup>1</sup>.

## Health deprivation



*'The Indices of Deprivation are a unique measure of relative deprivation at a small local area level (Lower-layer Super Output Areas) across England.*

**Medway ranks in the 38 % most deprived local authorities nationally for health. Seven areas rank in the most deprived 10% nationally for health and 20 rank in the most deprived 20% nationally** (bold added).

*Health deprivation is measured as the risk of premature death and the impairment of quality of life through poor physical or mental health.*

*There has been a relative worsening in health deprivation, with Medway seeing an extra four areas in the most deprived 10% nationally and an extra eight areas in the most deprived 20% nationally. While the most severely affected areas for health deprivation are spread across a number of wards in Gillingham, Chatham and Rochester, Gillingham North stands out as having two areas in the most deprived 10% for health, while River stands out as having the most deprived area for health in Medway. Medway's most deprived area – located in River Ward overall for multiple deprivation is ranked in the most deprived 1% of neighbourhoods for health nationally.'*<sup>1</sup>

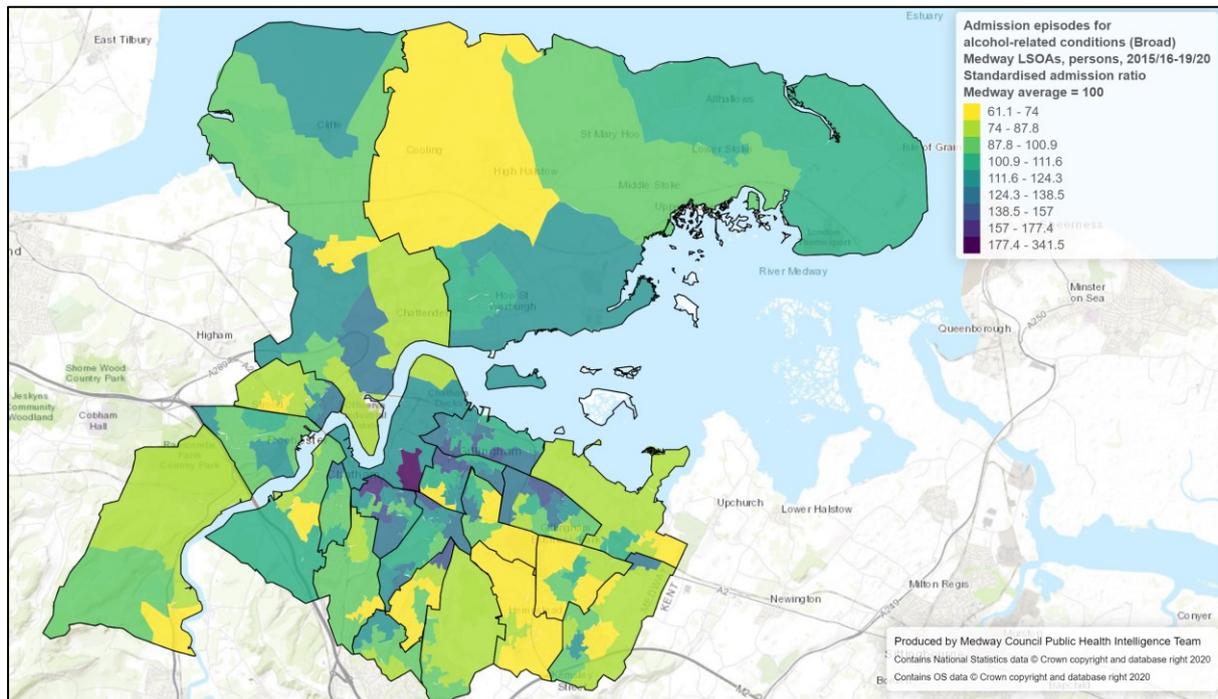
Deprivation is relevant to the issue of alcohol outlet density and alcohol related crime.

In 2014 Public Health in Medway commissioned a study into alcohol use in Medway. The result - Medway Alcohol: Insight (2014)<sup>2</sup> - identified there was a clear link between alcohol related harms, hospital admissions, alcohol related crimes and deprived areas where there is a density of licensed premises.

The most deprived areas of Medway can be found in

- Gillingham
- Chatham
- Luton
- Rochester
- Strood

## Hospital admission episodes for alcohol related conditions (Broad)



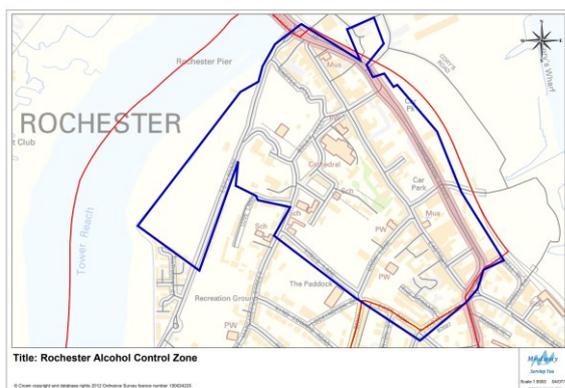
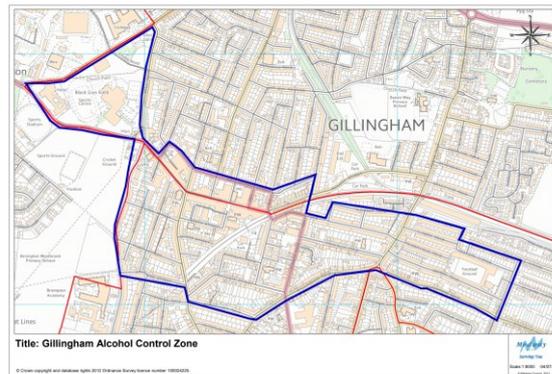
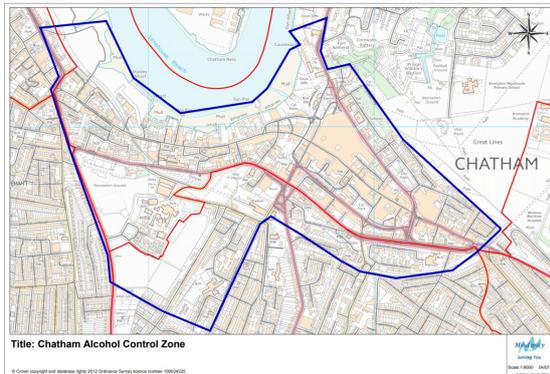
Alcohol misuse is associated with 60 medical conditions, from liver disease, heart disease and strokes to types of cancer, hypertension, and mental health issues.

This map shows the areas which have the highest rates of alcohol related hospital admissions in Medway.

The wards with areas showing the highest rates of alcohol related hospital admissions are, in no particular order,

- Peninsula
- Strood Rural
- Rochester East
- River
- Twydall
- Chatham Central
- Gillingham North
- Gillingham South
- Luton and Wayfield

## Public Space Protection Orders (formally Alcohol Control Zones)



Public Space Protection Orders (PSPOs), formally known as alcohol control zones, have been introduced in areas of Medway where there are proven issues with alcohol related anti-social behaviour. These areas were formally agreed in 2019, and there will be a further consultation undertaken in 2020 to assess if there is evidence to extend the areas shown above.

### Alcohol related litter, street drinking and associated anti-social behaviour

To provide a balanced and ongoing overview of the issues of street drinking and associated anti-social behaviour, evidence from 2018, 2019 and 2020 has been provided due to the issues of evidence gathering and monitoring of the public space and public alcohol related harms in 2020 due to Covid 19.

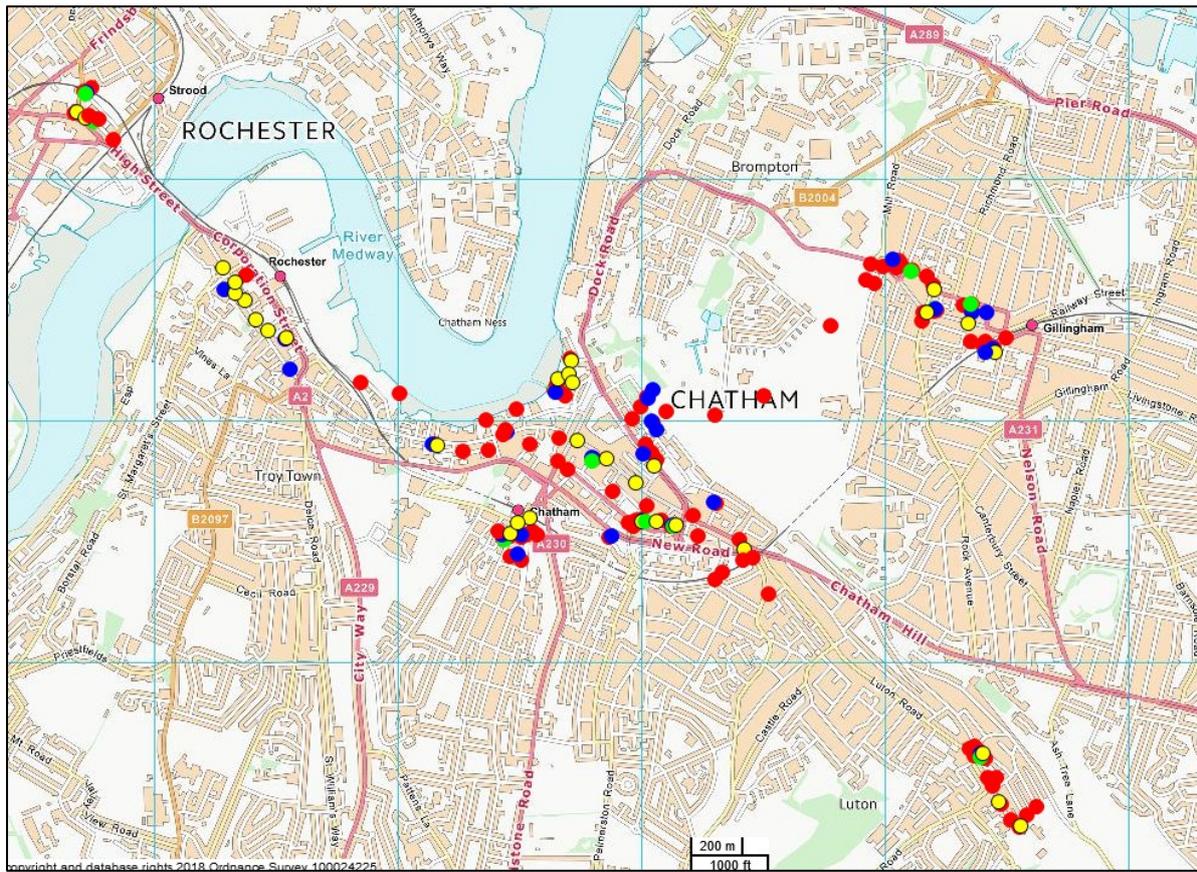
These maps show the locations where alcohol related litter has been found by public health and environmental enforcement. Additionally, the maps show where street drinkers have been seen or reported by members of the public, drug litter found by public health staff or

environmental enforcement, and human waste found in the same locations as the alcohol related litter.

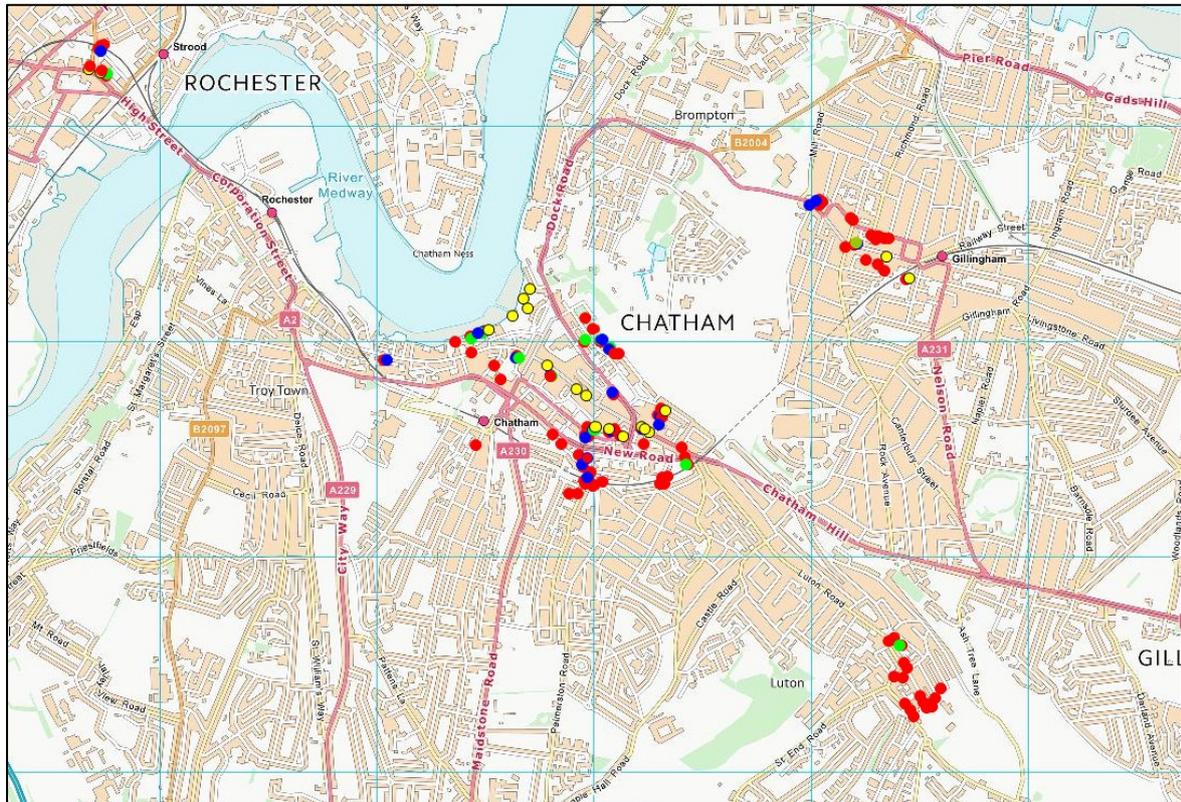
Key

	Alcohol litter
	Drug litter
	Public urination and defecation
	Street drinking

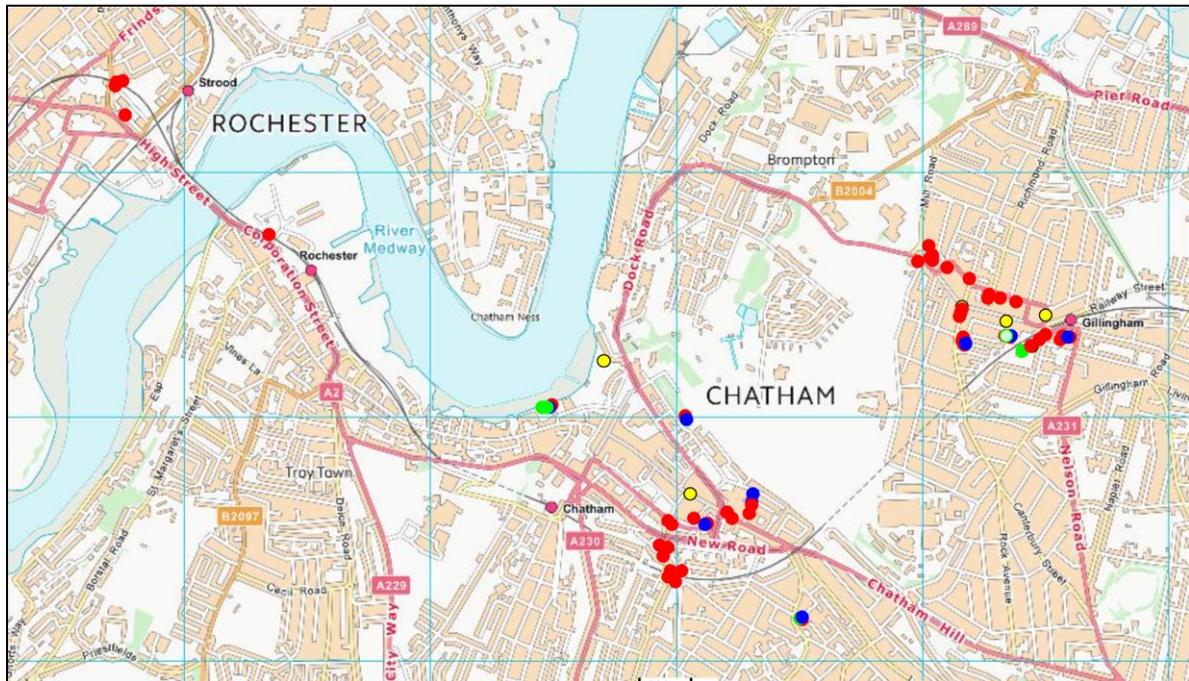
2018



2019



2020



## Research linking outlet density to alcohol harm

Research and academic evidence tells us that certain categories of crime are more likely to be 'alcohol related' than others. For example, violence offences are associated with the misuse of alcohol and theft of a motor vehicle, generally, is not. There is also substantial academic evidence which links the density of alcohol outlets in an area with the rate of alcohol harms, such as domestic abuse and alcohol harms in young people, in the same area. While this evidence does not directly relate to licensed premises in Medway, it provides an indication of the factors to consider when deciding what evidence is relevant in linking outlet density and alcohol harms. Much of this evidence indicates links between the density of off licences and these harms. Examples of this research are shown below.

<b>Theall, K.P. et al (2009). The neighbourhood alcohol environment and alcohol related morbidity. <i>Alcohol and Alcoholism</i>, 44(5), pp.491-499.</b>
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There is a substantial evidential link between the density of premises and alcohol harm; Alcohol outlets had a significant impact on health and social outcomes at a neighbourhood level, irrespective of individual consumption. There was a significant association between off-licence density and rates of liver disease, sexually transmitted infections and violence.
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<b>Livingston, M (2011). A longitudinal analysis of alcohol outlet density and domestic violence. <i>Addiction</i>, 106(5), pp.919-925</b>
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Alcohol outlets had a significant impact on rates of domestic violence; the affect was larger for off-licenses compared to on-licenses. A 10% increase in the number of off-licenses increased hospital admissions by 1.9% (on-licenses = 0.5%).
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<b>Osterberg, E (2009). Availability of Alcohol, a chapter within Alcohol in the European Union; Consumption, Harm and Policy Approaches. WHO Regional Office for Europe, pp83-88.</b>
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Consistent evidence that limiting availability (regulating the density of outlets and times of sale) leads to a reduction in alcohol harm.
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<b>Alcohol Concern (2011). One on every corner – The relationship between off license density and alcohol harms in young people. Report by the Alcohol Concern Youth Policy Project</b>
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Moderate but significant relationship between off-license density and underage alcohol specific admissions; 10% of admissions were directly attributable to off-license density.
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The link between alcohol outlet density in an area and alcohol harms is accepted by many

official bodies and forms parts of their policy or strategy documents.

The Government's 2012 Alcohol Strategy states

'There is evidence of a link between the number of venues selling alcohol in one area and levels of harm, whether this is crime, damage to health, or harm to young people'.

The strategy identifies home drinking as a key element and driver of alcohol related harm and acknowledges the research showing there is a link between off licence density and these harms.

NICE, Public Health England, the World Health Organisation and the Local Government Association also accept this link.

With the academic evidence, linked to the specific Medway data outlined in this document, the Director of Public Health recommends there is sufficient evidence to support the

Cumulative Impact Policy for off licensed premises in the following areas:

- The Chatham High St into Rochester High Street section of River ward, into the station area of Chatham Central.
- Gillingham North and South wards in the High St and Canterbury St area.
- Luton Road up to Capstone Road area of Luton and Wayfield ward, into the eastern part of Chatham Central.

The evidence shows the density of licensed premises in these areas contributes towards the levels of alcohol related harm in these areas.

## References

1. Medway Authority Monitoring Report 2019  
([https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjYyYkuILvAhXkQhUIHaG6BukQFjAAegQIARAD&url=https%3A%2F%2Fwww.medway.gov.uk%2Fdownload%2Fdownload%2Fid%2F4531%2Fauthority\\_monitoring\\_report\\_-\\_volume\\_1\\_2019.pdf&usg=AOvVaw2t2MmLExsLiZ1GfcwO7YHm](https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjYyYkuILvAhXkQhUIHaG6BukQFjAAegQIARAD&url=https%3A%2F%2Fwww.medway.gov.uk%2Fdownload%2Fdownload%2Fid%2F4531%2Fauthority_monitoring_report_-_volume_1_2019.pdf&usg=AOvVaw2t2MmLExsLiZ1GfcwO7YHm))
2. Medway Insights: Alcohol (2014) Unpublished.
3. Livingston, M (2011). A longitudinal analysis of alcohol outlet density and domestic violence. *Addiction*, 106(5), pp.919-925 <https://onlinelibrary.wiley.com/doi/10.1111/j.1360-0443.2010.03333.x>

# Appendix A

## Chatham Cumulative Impact Assessment

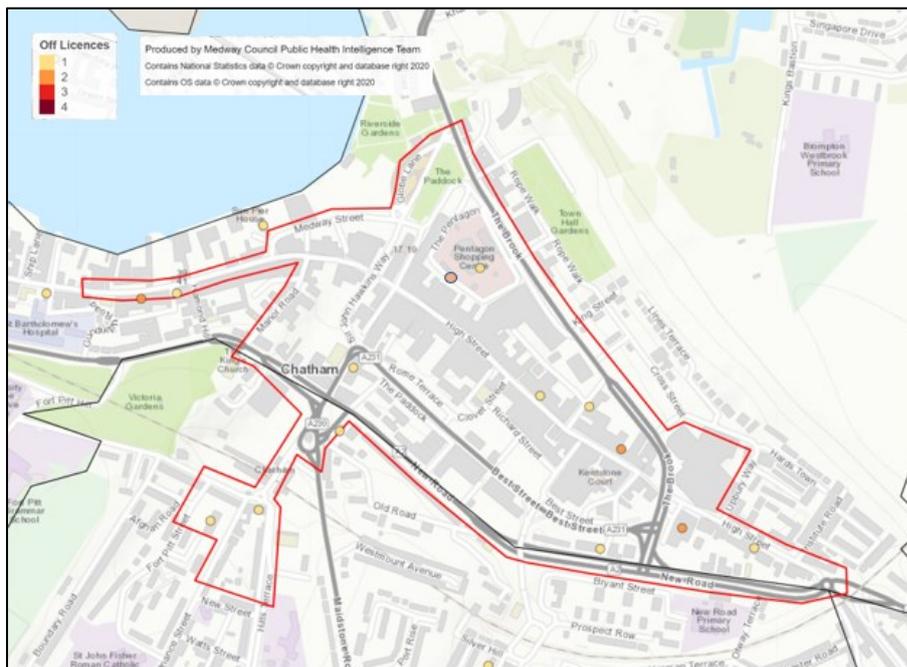
### Introduction

This report outlines alcohol related harms in and around Chatham High Street area covering parts of both River and Chatham Central wards.

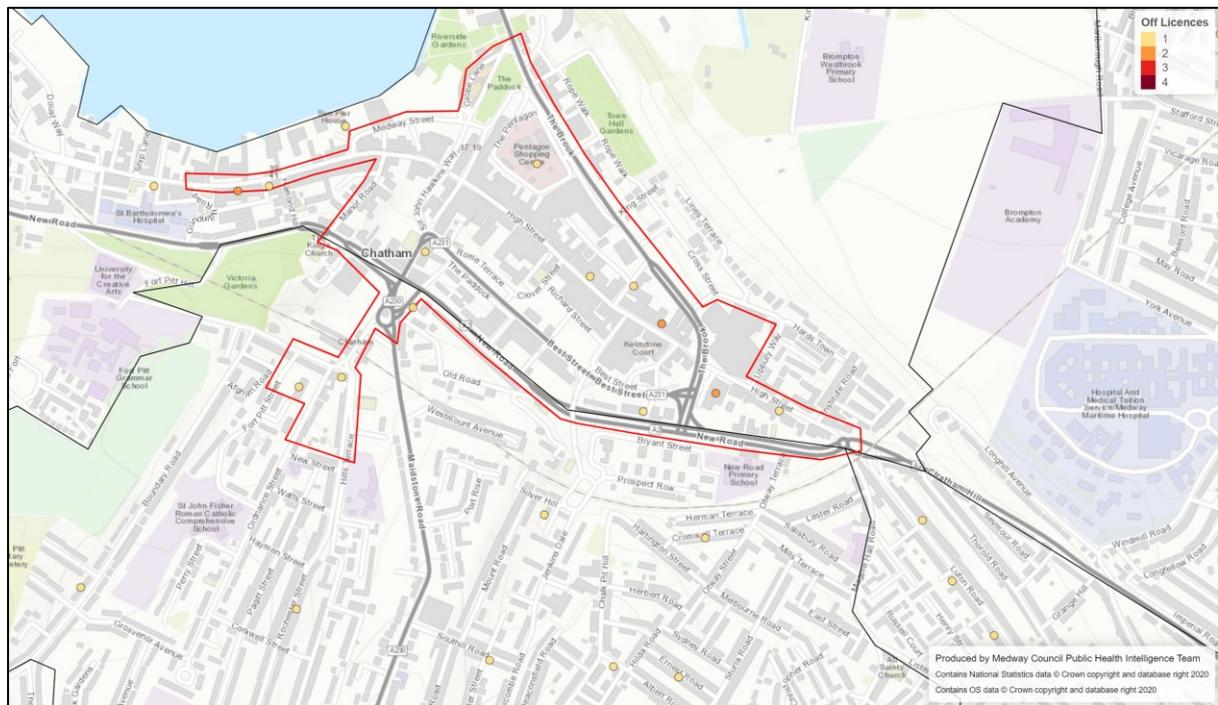
The evidence presented below covers

- Deprivation
- Alcohol related hospital admissions
- Public Space Protection Order
- Public nuisance in the form of
  - street drinking,
  - alcohol litter
  - drug litter
  - human waste
- Community comments

### Chatham High St Cumulative Impact Policy area



Medway Licensing has recorded 18 retail premises licensed to sell alcohol for consumption off the premises in the current Chatham High Street policy area, with many more in easy walking distance. (Medway Council Licensing, 2020)

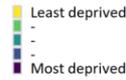
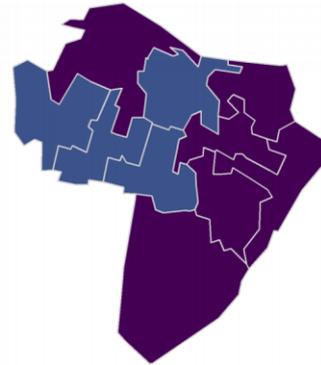
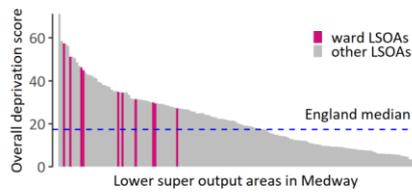
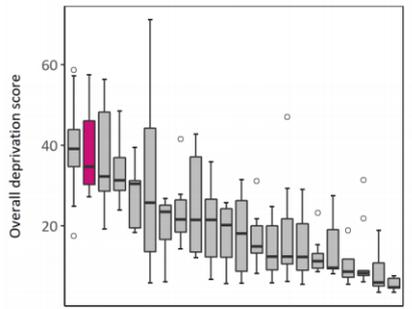


## Deprivation

Chatham High Street and some of the surrounding areas are among the most deprived in Medway.

In 2014 Public Health in Medway commissioned a study into alcohol use in Medway. The result - Medway Alcohol: Insight (2014) - identified there was a clear link between alcohol related harms, hospital admissions, alcohol related crimes and deprived areas where there is a density of licensed premises.

# Deprivation

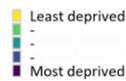
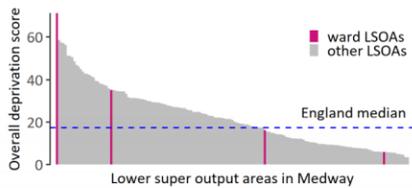
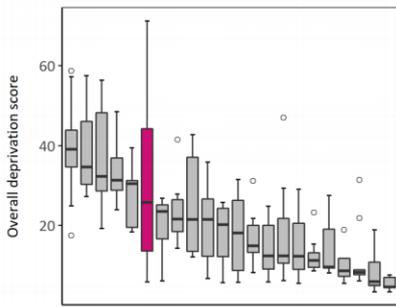


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Contains OS data © Crown copyright and database right 2019

Indices of Deprivation 2015 (Department of Communities and Local Government), 2015

Chatham Central ward - Medway Joint Strategic Needs Assessment 2021  
<http://www.medwaysna.info/profiles/wards/Chatham%20Central.pdf>

# Deprivation

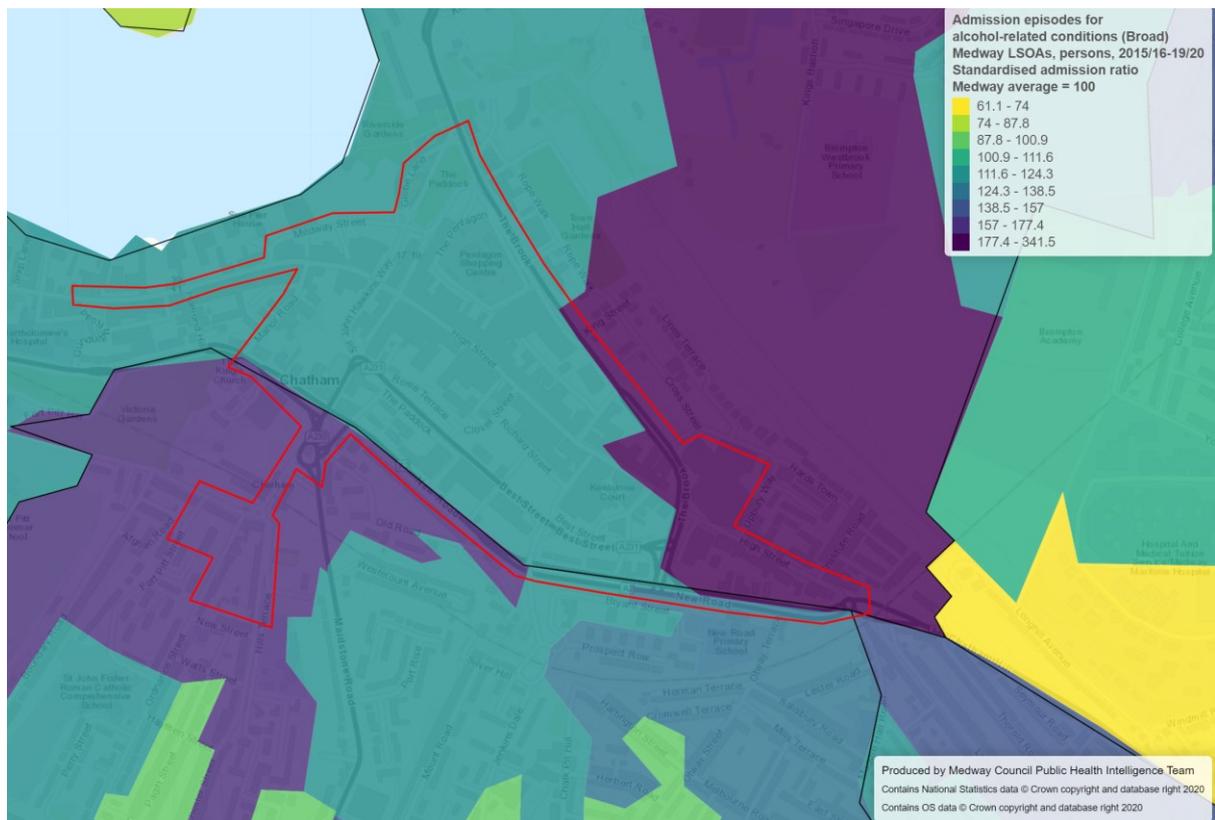


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Contains OS data © Crown copyright and database right 2019

Indices of Deprivation 2015 (Department of Communities and Local Government), 2015

River Ward - Medway Joint Strategic Needs Assessment 2021  
<http://www.medwaysna.info/profiles/wards/River.pdf>

## Admission episodes for alcohol related conditions (Broad)



River has the area with the highest rate for alcohol related hospital admissions in Medway and Chatham Central ward also has areas of high rates.

## Alcohol related litter, street drinking and other alcohol related anti-social behaviour in the Chatham High Street area.

To provide a balanced and ongoing overview of the issues of street drinking and associated anti-social behaviour evidence from 2018, 2019 and 2020 has been provided due to the issues of evidence gathering and monitoring of the public space and public alcohol related harms in 2020 due to COVID 19.

The below maps show the locations where alcohol related litter has been found on more than one occasion by public health and environmental enforcement. Additionally, the maps show where street drinkers have been seen or reported by members of the public, drug litter found by public health staff or environmental enforcement, and human waste found in the same locations as the alcohol related litter.

Photographs have been provided to give an indication of the types of alcohol related litter, drug related litter and evidence of human defecation and urination found during the 3 year period covered. The photographs are not intended to be more than an indication of the type of litter in this area and are not representative of the amount that has been recorded during this time, which runs into thousands of separate items.

While there is evidence of areas where large quantities of litter is left, much of the litter consists of single cans and bottles. However, taken in totality, there is a large quantity of it throughout the area covered by the policy. It can be seen over the three year period the litter is ongoing and consistent in all the areas shown.

### Key to map

	<b>Alcohol litter</b>
	<b>Drug litter</b>
	<b>Public urination and defecation</b>
	<b>Street drinking</b>

### 2018

A member of public health staff visited this area throughout 2018 and recorded ongoing evidence of alcohol street drinking, associated litter and alcohol related anti-social behaviour and nuisance.

As can be seen from the map below, alcohol related litter was found throughout Chatham town centre and surrounding area. This litter consisted of all types of alcohol, from cheap superstrength beer and cider, to bottles of perry and spirits, particularly vodka. The river front area, the car parking area at the back of Debenhams, the lower High Street area and the lower part of Ordnance Street were of particular concern.

During March, April and May a problem of public drinking was identified in the grass area between the river and Chatham library. Public health staff saw many separate incidents of anti-social behaviour in this area. Examples of the type of incidents seen, which were all in clear view of members of the public walking through the area and those using the bus station, were:

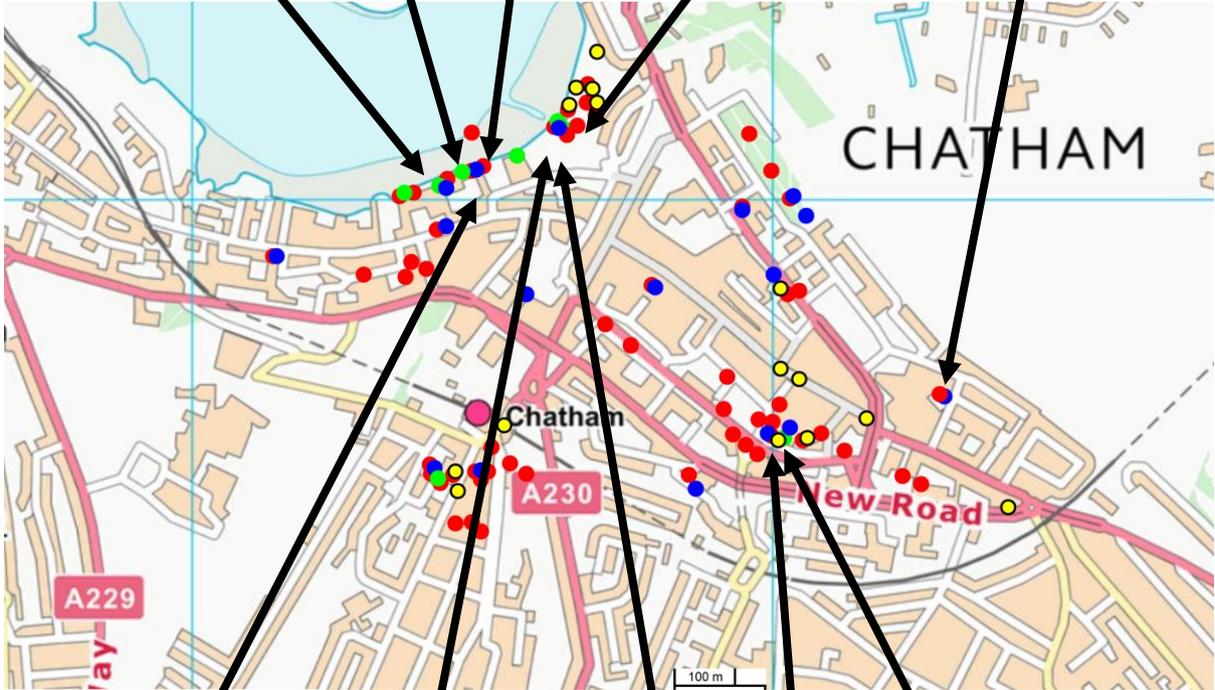
- Four men and one woman was seen sitting drinking cans of Stella by a member of public health. Another colleague walked past about an hour later and the group were drinking Strongbow cider. They were shouting and swearing.
- A group of eight to ten men and women drinking beer. They were very loud and rowdy with one of the men [...] pretending to get his penis out of his trousers and flashing to the women in the group, who all thought it was very funny.

Groups drinking cheap beer and cider in this area were seen on a daily basis and public health assisted the police with carrying out licensing visits at nearby premises to address the sale of alcohol to known street drinkers.

Public health staff also found drug related paraphernalia in several locations where street or public drinking was believed to take place in and around Chatham High Street. This consisted of discarded syringes, wrappers, discarded spoons (used during opiate consumption) and syringe caps. These were often co-located with alcohol litter.

Environmental enforcement reported to public health they had remove drug litter from all over the policy area. The areas where there were particular problems were

- The river front area, particularly the area around Anchorage House and Sun Pier - syringes, spoons, syringe wrappers and caps, discarded prescription blister packets of medication such as pregabalin.
- Car parks and alleyways around Old Road and The Mount – syringes, citric acid wrappers and spoons
- Whiffens Avenue and Town Hall Gardens area – syringes, syringe caps and wrappers
- The car park behind Go Outdoors building - syringes, spoons, need wrappers, glass ampoules, citric acid wrappers
- Car parks behind Debenhams – syringes, wrappers, and syringe caps.



2019

A member of public health staff walked around this area throughout 2019 and recorded ongoing evidence of alcohol street drinking, associated litter and alcohol related anti-social behaviour and nuisance in and around the High Street area.

There was evidence of street drinking across the area covered by the Chatham CIP, from the River Walk, all along the High St, Town House Gardens, in the car parks to the south of the High St, Ordnance St and The Mount onto Jenkins Dale and Skinner Street.

People drinking in public were regularly seen by public health staff all over Chatham High Street area. These incidents ranged from single people walking along drinking from a can of beer or cider, to groups drinking from bottles of perry, spirits, beer and cider. Anti-social behaviour by street drinkers was regularly seen, which varied from people shouting and swearing at each other and passers-by to fighting.

Alcohol related litter primarily consisted of bottles and cans of beer and cider, both 'super strength' and regular strength as well as bottles of perry and spirits, particularly vodka. There was evidence of urination, defecation, and drug paraphernalia, including used syringes in many of the same locations as public drinking and alcohol litter.

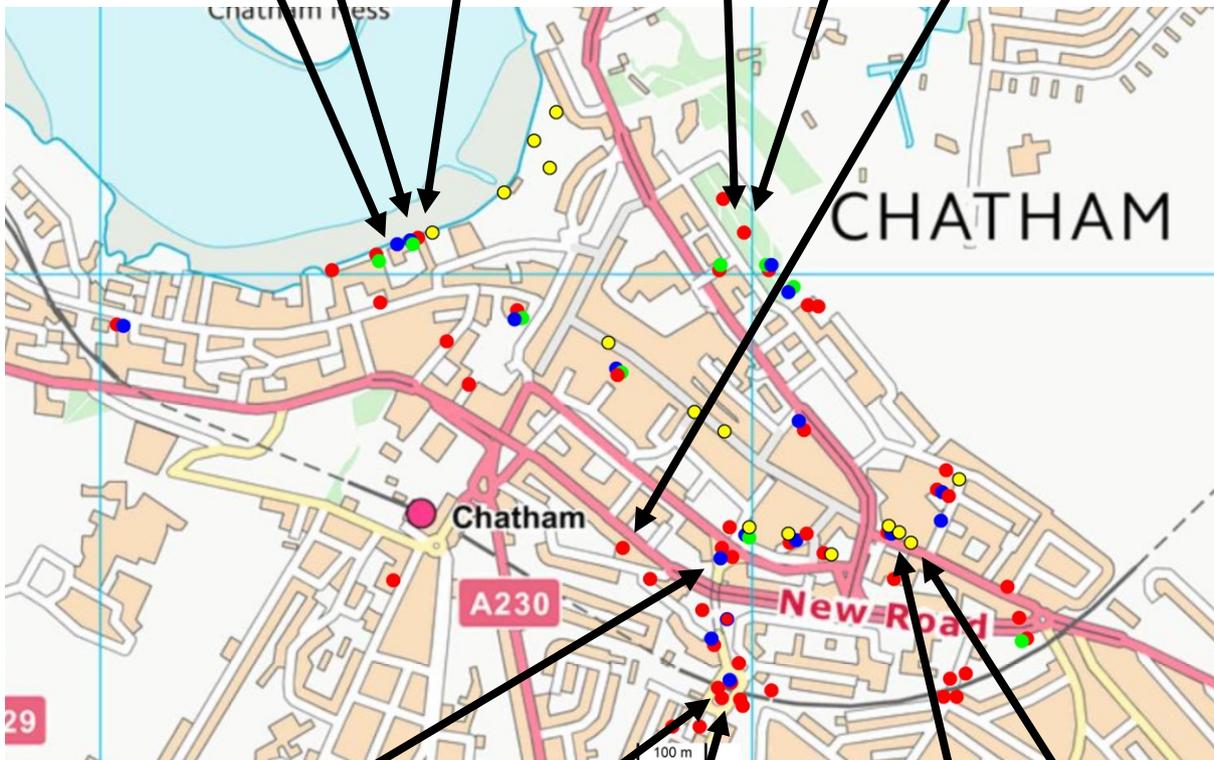
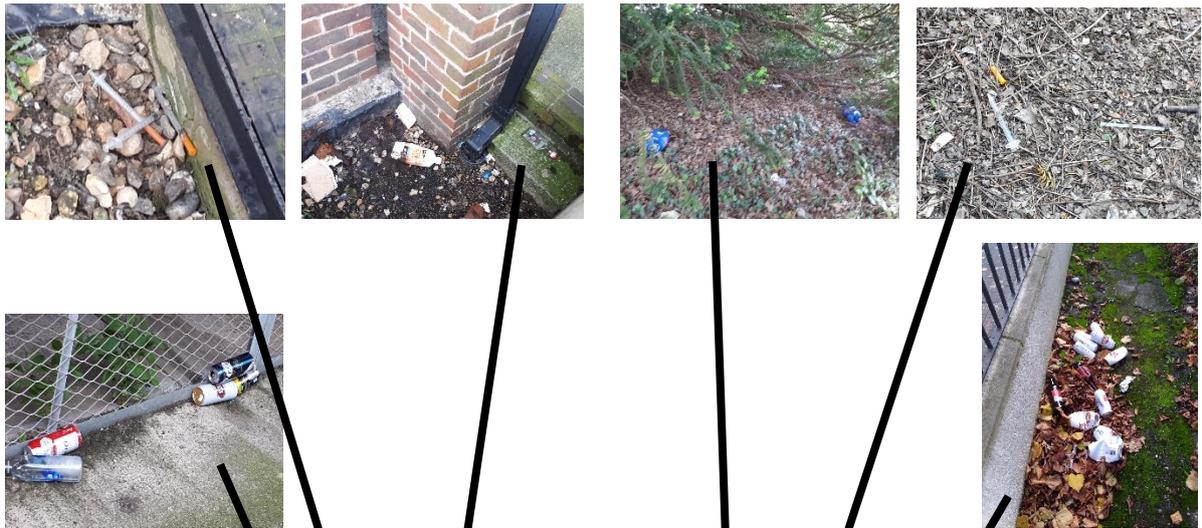
All this alcohol related nuisance and anti-social behaviour was witnessed multiple times in the same locations. During several months of this year there was a particular issue of rough sleeping in the River Walk/Anchorage House area. Environmental enforcement officers, who were tasked with picking up discarded syringes and other drug paraphernalia, witnessed people injecting themselves and urinating and defecating, particularly in the river front area by Sun Pier House. The officers reported they saw alcohol use by the same people in this area. This was supported by the evidence seen by public health staff, who found alcohol related litter in this area, along with discarded syringes, other drug paraphernalia and what was believed to be human faeces, along the River Walk.

As they walked about public health staff spoke to shop workers and members of the public in the areas most effected by the issues. People said they saw street drinking on a daily basis in and around the High Street, with associated anti-social behaviour, such as urinating, defecation, and drug use. Staff from a town centre store described how their shop had been the subject of shop theft carried out by the drinkers, who were drunk while they committed the offences. Several of them described how they witnessed the same people drinking and

using drugs in the area around the shop and finding used syringes and other drug paraphernalia.

Environmental enforcement reported to public health they had removed drug related litter from many locations within the CIP area, including on multiple occasions

- Car park at the rear of Go Outdoors – syringes, spoons, need wrappers, glass ampoules, citric acid wrappers
- Rear of Sun Pier, River Walk – syringes, spoons
- Town Hall Gardens and Whiffens Avenue car park – syringes and wrappers
- Anchorage House car park, High Street – syringes, spoons, citric acid and wrappers
- High Street near to Argos – syringes, spoons, sharps box and wrappers
- Landsdown Court car park – spoons and citric acid wrapper
- Magistrates Court area – syringes



## 2020

Due to the Covid 19 pandemic evidence gathering was restricted during this year and was almost entirely triggered by licence applications or was carried out pre March. Therefore, evidence is limited in both the number of times it was carried out, and the locations.

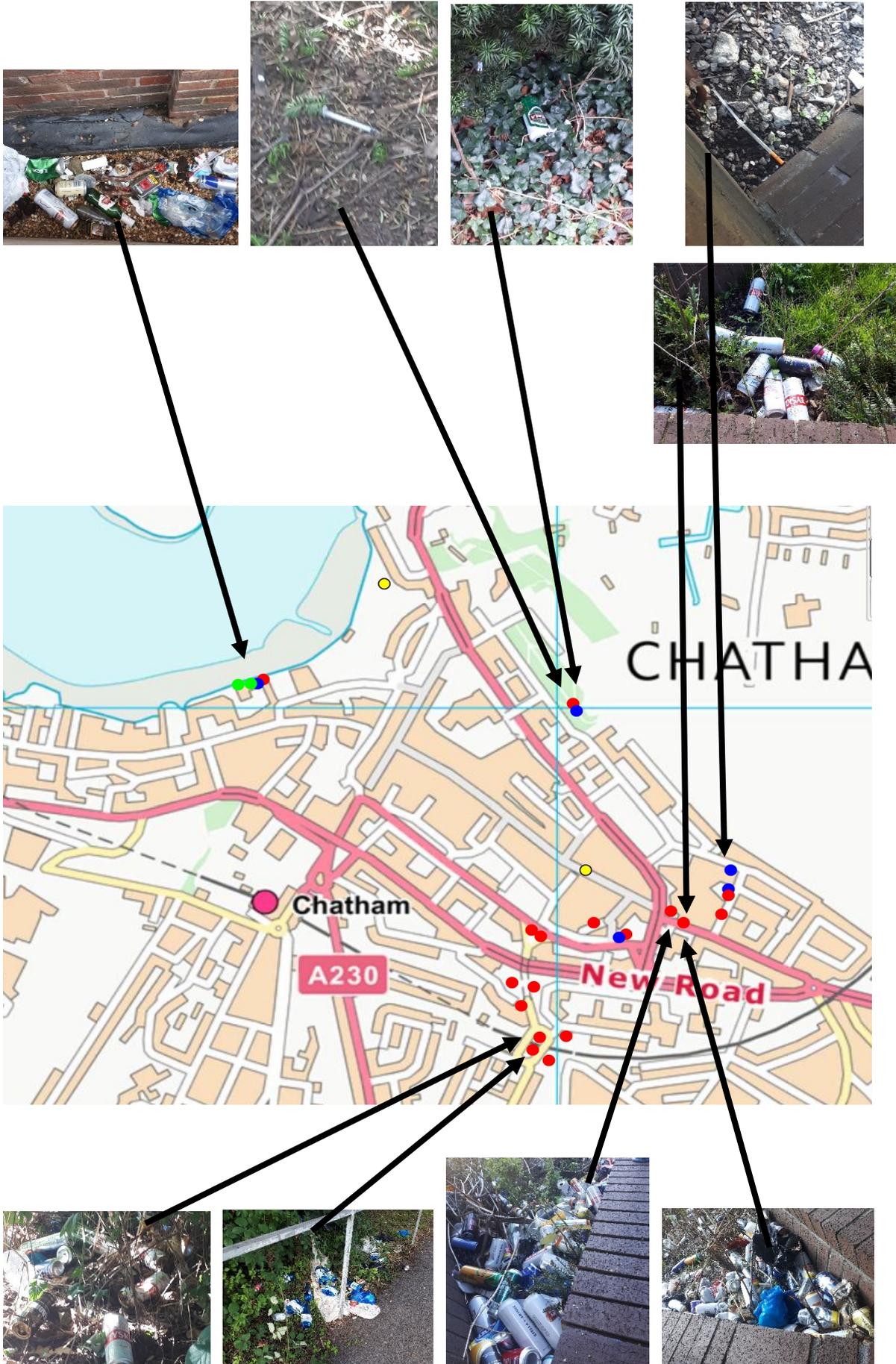
During the early part of the year and on a very limited number of occasions during the rest of the year a member of public health staff visited the policy area and recorded ongoing evidence of alcohol street drinking, associated litter and alcohol related anti-social behaviour and nuisance.

The areas where alcohol litter was recorded were Skinner Street/Jenkins Dale leading onto The Mount and under the Best Street underpass, which all had very high levels of alcohol litter. This followed issues identified in 2019 with public drinking and associated anti-social behaviour in this area. River Walk from Sun Pier to Anchorage House also had evidence of public drinking, as well as drug use and public defecation and urination.

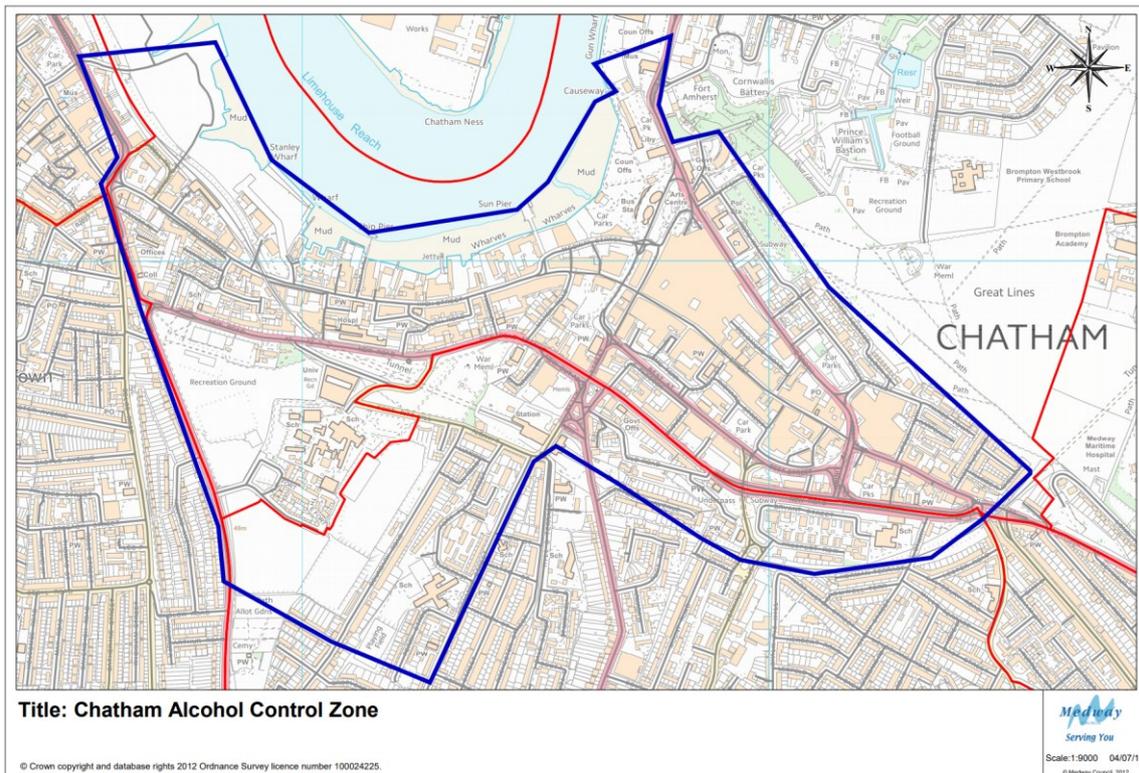
The raised flower beds outside the building which had previously held Go Outdoors at the junction of the High Street and The Brook still had very high levels of discarded alcohol cans and bottles, again carrying on from issues identified in 2019 in this area. Drug paraphernalia was found at the rear of the car park in Upbury Way.

There was also alcohol related litter in the area around the Salvation Army building in Whittaker Street and the nearby raised flower beds at the junction of Best Street and The Brook.

It was noticeable that even with the restrictions which had been in force during most of 2020 there was still evidence of extensive alcohol related nuisance in the area.



## Public Space Protection Orders (formally Alcohol Control Zones)



Public Space Protection Orders (PSPOs), formally known as alcohol control zones, have been introduced in areas of Medway where there are proven issues with alcohol related anti-social behaviour.

The PSPO for Chatham was adopted by the council in 2019 due to evidenced alcohol related anti-social behaviour in this area.

## Community comments

- **Resident 1 response – New Road, Lower High Street and Dock Road areas.**

### Cumulative Impact Policy (CIP) Review

I am responding to your invitation to comment and write as an individual, although I am a member of two different PACT groups (Brompton and New Road). I have recently moved from New Road, Chatham to Kitchener Barracks, Chatham and retain links with my previous area.

#### Area of Interest

This response relates to the following areas:

- New Road, Chatham from the Old Road junction by Papa Johns to the Gibraltar Service Station, Old Road and Upper Mount Car Parks
- The Lower High Street from Sun Pier to Rochester Riverside by Doust Way
- Dock Road area adjacent to Brompton Barracks and Brompton Hill

#### Overall impact

It is my view that the CIP has had a marked and positive effect on consumption of low priced, high strength alcohol. Its overall approach of not allowing applications for off-licences at the outset is to be welcomed, as any business which competes on price to sell high strength alcohol is undesirable. I personally regret that it is not possible to prohibit the sale of high strength beers and lagers in their entirety and think that more work needs to be done to address this issue. It is also apparent from littering around the areas mentioned, that comparatively inexpensive bottles of spirits such as vodka and whisky, are also being sold to street drinkers.

#### Evidence of alcohol littering

The Covid 19 restrictions have had a noticeable impact on the visibility of alcohol related debris. As an individual, I have stayed at home more and I have also noticed less street drinkers. Car park cleaning seems more thorough and it is likely this is because cleaning teams can access car parks more easily because of the absence of parked vehicles.

There is less alcohol litter in places such as the **Lower Mount and Old Road Car Parks**.

There remains some evidence of discarded, high strength beer cans and bottles in the flower planters at the junction of **New and Old Road by Papa Johns**. These are removed by the local trader.

There is extensive evidence of discarded alcohol debris near the student accommodation in **Doust Way, Rochester**. While there is no identifiable group of people responsible, it is likely to be street drinkers. However, the cleaning of the area surrounding the student accommodation is generally very poor with smokers dropping butts, causing a serious littering issue.

This suggests that the CIP should have regard to the problems in the **Lower High Street** and any review should consider if further action should be taken to regulate alcohol sold in that area.

There is also alcohol related debris in the path side garden in front of the blocked, stairway entrance to Kitchener Barracks near the Civic Centre. Street drinkers regularly sit on the steps at the blocked entrance. There is also some littering on Brompton Hill.

## Recommendations

It would seem perverse to take any action which reduces the impact of the CIP. Any changes to the CIP should be related to how it could be extended further, to reduce sale of high strength beers and lagers in their entirety. The sale of smaller bottles of high strength spirits should also be monitored carefully.

The area adjacent to the Doust Way student accommodation should be focused upon as there is clearly alcohol abuse in this area. I believe this constitutes a dangerous area because of proximity to the river and also to student accommodation. It is also recommended that awareness of the issues related to alcohol abuse continue to be shared with Councillors. There is a deterioration of the public realm in places such as the Rochester Riverside and Lower High Street. I firmly believe that the abolition of locally based Community Wardens is a contributory factor to the difficulties which prevail and there could be greater focus on reducing street drinking in specific areas.

Brompton Barracks, Dock Road



Rochester Riverside: Doust Way, UCA Halls

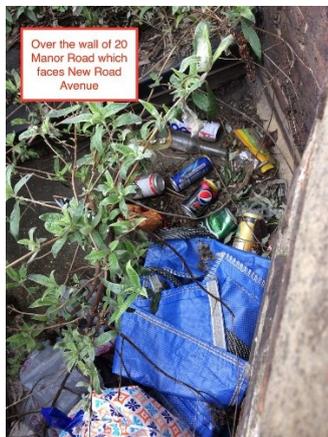


- **Resident 2 response – Chatham High Street area, County Court end.**

*In response to your email requesting information to support the Cumulative Impact Policy review, [...] took some pictures during our local walk this morning. The photos have been annotated with the location, some are on private property, but the litter has been deposited by passers-by on public foot paths or pavements.*

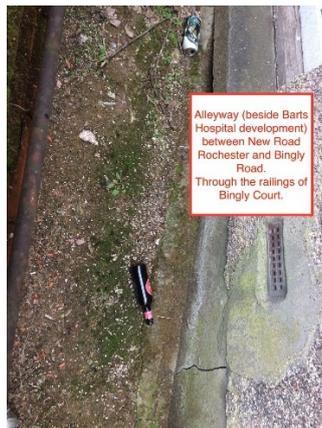
*Considering we are currently in "lockdown" there seems to be more litter and alcohol based litter around than we would have expected. Also, graffiti seems to be on the increase, we did not photograph it but the hoarding around Barts Hospital site seems to be a popular spot, along with the top of the Spemby Building (wall facing Manor Road, has been reported to Medway Council) and the Council sign for Victoria Gardens which can be seen from New Road Avenue.*

*We can see no good reason why the Cumulative Impact Policy should be withdrawn or have less restrictions than are currently in place. Encouraging good well managed establishments in appropriate places is to be welcomed. The Cumulative Impact Policy provides guidance to business and Council to ensure anti social behaviour does not increase in the area.*





Alleyway (beside Barts Hospital development) between New Road Rochester and Bingly Road



Alleyway (beside Barts Hospital development) between New Road Rochester and Bingly Road. Through the railings of Bingly Court.



Alleyway (beside Barts Hospital development) between New Road Rochester and Bingly Road. Through the railings of Bingly Court.



Alleyway (beside Barts Hospital development) between New Road Rochester and Bingly Road



Alleyway (beside Barts Hospital development) between New Road Rochester and Bingly Road

- In 2019 public health staff attended the Arches Local community group, which represents people in the Luton area, but also extends along Chatham High St and up the Brook and into Town Hall Gardens, and recorded the following questions and answers concerning alcohol harm. The majority of the comments cover the Luton Road area in the extract below, however the observations which refer to this area are highlighted. There were three participants.**

**General comments** – *In general terms what impact does the sale of alcohol have on your community? Please describe the geographical area that is covered by your comments.*

Alcohol is the biggest killer here. There hasn't been a reduction in consumption or litter. Public drinking has got worse. There's more homelessness, more temporary accommodation, more HMOs. This has led to a huge influx into the area from outside Medway and they have brought their problems and dependencies.

**Crime and disorder** – *How alcohol impact on crime and disorder in your community? Examples may include alcohol related violence, disorder, damage and anti-social behaviour. Please give specific examples if possible.*

Many of the shops along the road sell cheap illegal alcohol. I've heard people being offered cheap vodka and cheap tobacco.

Alcohol related crime, like fighting hasn't gone down. We see fighting in the streets. There's a lot of super strength alcohol sold in the shops and this leads to drunkenness and fighting. It affects us and residents indirectly as alcohol related crime is all around us.

There's use of drugs and drinking in public places. I've seen someone shooting up at the bus stop.

There's a lot of drug taking around Luton junior school field. 'Fit and Fed' is held there during the summer holidays. I was looking around and I found 4 semi-conscious people lying on the ground near to the field where the kids were playing, one with a needle hanging out of his arm. I just backed off and left them and called the police.

People come to the area to buy drugs and if they can't find them, they buy alcohol. All the shops sell super strength beer and cider and it's really cheap.

There's a massive problem with theft of alcohol from the shops. The shop owners are always telling us there's a problem.

If you look at a spider diagram of all of this with alcohol in the middle - People commit crime; they're drunk or drugged or both, and alcohol is the common thread.

Alcohol related DA (domestic abuse) is huge. I see the black eyes. The aggression has an effect on children. They tell us. Parents turn up at school drunk and are aggressive to their children.

**Public nuisance** – *How does alcohol impact on public nuisance in your community? Examples may include noise, street drinking, litter, public urinating, and defecating. Please give specific examples if possible and include photographs if appropriate.*

We had a litter pick at Arches heights, through the door in the hoarding, which has now gone. We took away hundreds of cans a month or so ago. There are people living rough there using drugs as well.

Street drinking is all over the place. Its normal. It's by the footbridge, the area outside Go outdoors, Debenhams and the back of the NCP cark. There is always drug use and street drinking in Town Hall Gardens, right by the children's play area.

The shops in the area say they don't want to sell the super strength stuff but they have to so they can make money. We are suffering from the proliferation of shops selling cheap super strength alcohol. White cider is killing people.

**Public safety** – *How does alcohol impact public safety in your community? Examples may include concerns about broken glass, unconsciousness due to alcohol consumption and alcohol poisoning. Please give specific examples if possible.*

There is broken glass everywhere. Cans of beer and cider which can be jagged and sharp. We find sharps (syringes) in the same places as where people drink so drug use is co-located in the same places where there is public drinking.

**Children** – *How does alcohol effect children in your community? Examples may include underage sales, underage drinking, both in private and public and anti-social behaviour associated with children fuelled by alcohol. Please give specific examples if possible.*

Children are drinking from an early age. From 11 up, maybe even younger. Drinking has become normal because it's so cheap people drink at home, and children see it as normal.

Alcohol causes aggression which has an effect on children. They tell us their parents get drunk. We see parents turn up at school drunk to pick up their children and are aggressive to the children.

The children also see the drinking on the streets, and it becomes normal.

**Any other comments** – *Are you aware of the licensing policy and/or the CIP or SAP? Has the policy had any impact on licensable activities? Have you used the policy for any reason? If you have can you give examples.*

We still need the CIP to protect us from the proliferation of shops which sell super strength alcohol. We don't need any more. We need to reduce the number of ones we have, or at least stop them selling the cheap, strong beers and ciders.

When the new Local Plan comes in, Luton Road will be removed from the designation of 'High St' which means it's likely there will be more HMOs, leading to more people with problems and more drinking.

We have used the policy and CIP when a pizza takeaway applied for extended hours and we objected.

We are aware that two off licences have been refused in the area which we support.

We want to support businesses which sell alcohol responsibly, like a decent café/restaurant where cheap alcohol isn't the main thing being sold. What we don't want are more off licences. We don't need more as there are too many.

## Appendix B

# Gillingham Cumulative Impact Assessment

### Introduction

This report outlines alcohol related harms in and around Gillingham High Street covering parts of Gillingham North and Gillingham South wards.

The evidence covers

- Deprivation
- Alcohol related hospital admissions
- Public Space Protection Order
- Public nuisance in the form of
  - street drinking,
  - alcohol litter
  - drug litter
  - human waste
- Community comments

### Gillingham High St Cumulative Impact Policy area



Medway Licensing has 34 retail premises licensed to sell alcohol for consumption off the premises in the current Gillingham High Street policy area, with many more in easy walking distance. (Medway Council Licensing, 2020)

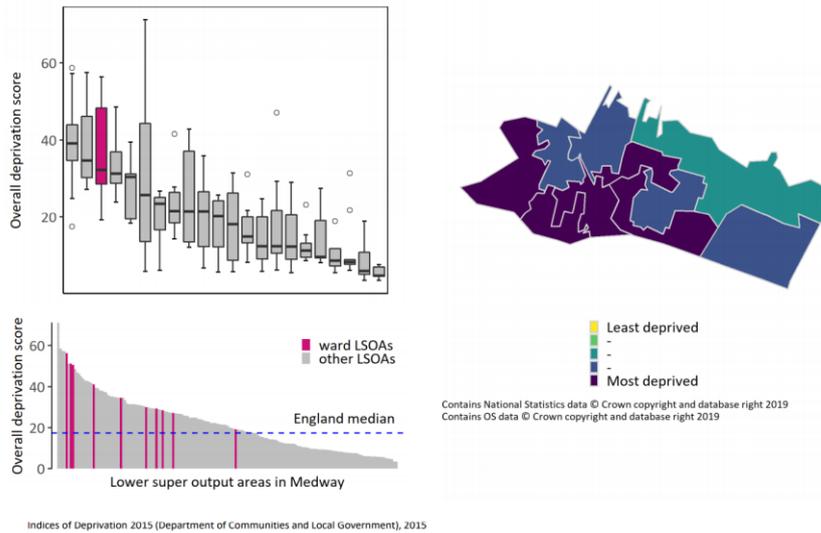


## Deprivation

The area containing Gillingham High Street, Canterbury Street and surrounding areas are among the most deprived in Medway.

In 2014 Public Health in Medway commissioned a study into alcohol use in Medway. The result - Medway Alcohol: Insight (2014) - identified there was a clear link between alcohol related harms, hospital admissions, alcohol related crimes and deprived areas where there is a density of licensed premises.

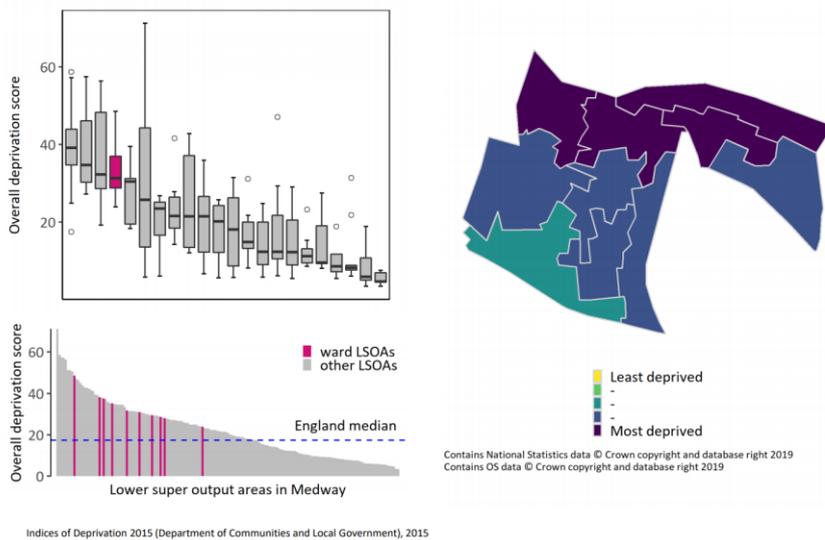
# Deprivation



## Medway Joint Strategic Needs Assessment 2021

(<http://www.medwaysna.info/profiles/wards/Gillingham%20North.pdf>)

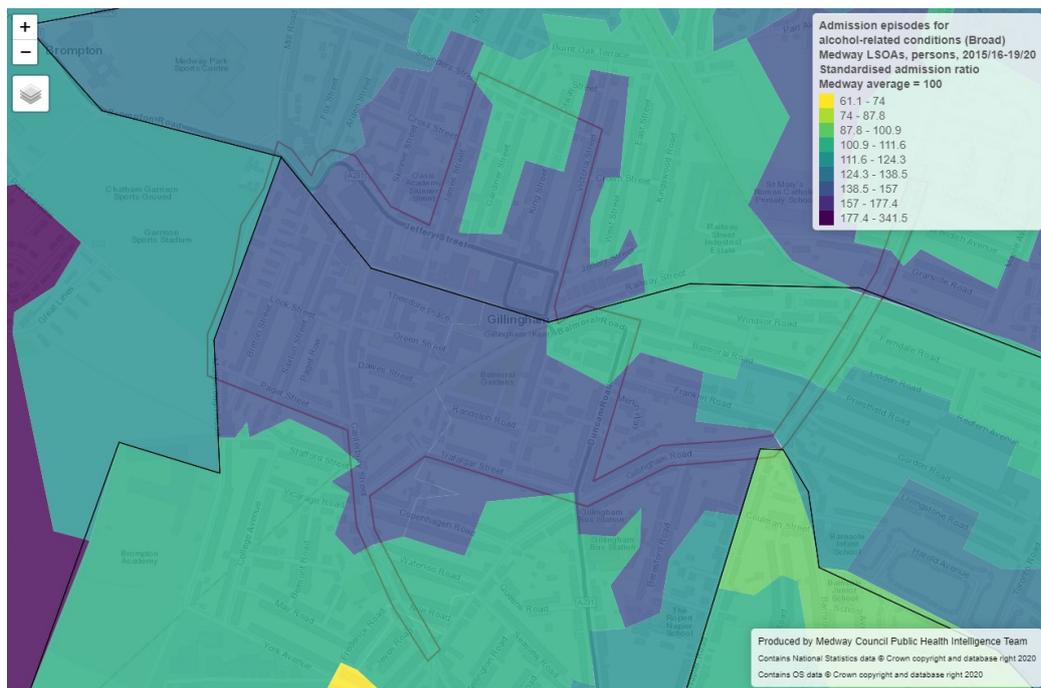
# Deprivation



## Medway Joint Strategic Needs Assessment 2021

(<http://www.medwaysna.info/profiles/wards/Gillingham%20South.pdf>)

## Admission episodes for alcohol related conditions (Broad)



The wards of Gillingham North and Gillingham South have among the highest alcohol related hospital admissions in Medway.

## Gillingham alcohol related litter and street drinking.

To provide a more balanced overview of the issues of street drinking and associated anti-social behaviour evidence from 2018, 2019 and 2020 has been provided due to the issues of evidence gathering and monitoring of the public space and public alcohol related harms in 2020 due to COVID 19.

The below maps show the locations where alcohol related litter has been found on more than one occasion by public health and environmental enforcement. Additionally, the maps show where street drinkers have been seen or reported by members of the public, drug litter found by public health staff or environmental enforcement, and human waste found in the same locations as the alcohol related litter.

Photographs have been provided to give an indication of the types of alcohol related litter, drug related litter and evidence of human defecation and urination found in and around Gillingham High Street during the 3 years. The photographs are not intended to be more

than an indication of the type of litter in this area and are not representative of the amount that has been witnessed during this time, which runs into thousands of separate items.

### Key to maps

	<b>Alcohol litter</b>
	<b>Drug litter</b>
	<b>Public urination and defecation</b>
	<b>Street drinking</b>

### 2018

A member of public health staff has attended this area between March and October 2018 and recorded ongoing evidence of alcohol related street drinking and associated litter in and around the High Street CIP area.

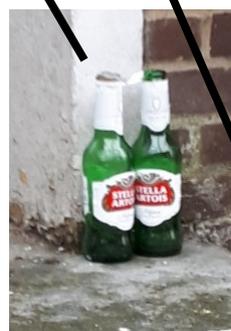
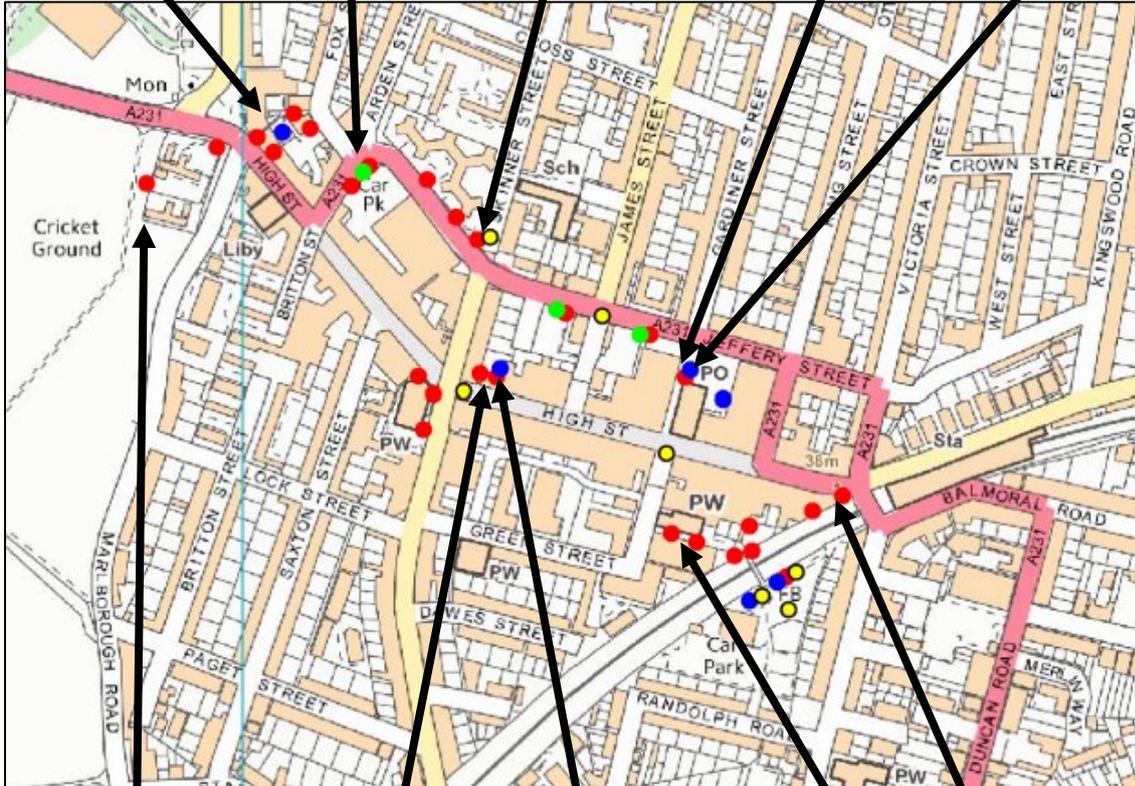
This litter consisted of bottles and cans of beer and cider, both 'super strength' and regular strength and bottles of spirits, particularly vodka. Areas of particular concern were the alleyway of the High Street between Scope and Bet Fred, Balmoral Gardens, the alleyways between the High St and Fox St, Great Lines Park, St Marks Church grounds, Green Street area and Jeffery St, although discarded bottles and cans could be seen all over the area to a greater or lesser extent.

Street drinking was seen by public health staff Skinner Street, Jeffery Street, Balmoral Gardens, High Street and Canterbury Street. Incidents ranged from single people walking along the street drinking from a can of beer to a group of six men and women sitting on a bench in Balmoral Gardens drinking beer and cider. They were shouting and swearing, which could be heard on the other side of the railway track in the Nisa car park.

Public health staff also found evidence of drug related paraphernalia, including discarded deal bags, discarded spoons (used during opiate consumption), syringes and syringe caps. These were often co-located with alcohol litter.

Environmental enforcement reported to public health they had removed drug related litter from the following locations within the CIP area

- Phoenix Court, Fox Street – uncapped syringes
- Balmoral Gardens – deal bag



## 2019

A member of public health staff has walked around this area throughout 2019 and recorded ongoing evidence of alcohol related street drinking, associated litter and alcohol related anti-social behaviour and nuisance in and around the High Street area.

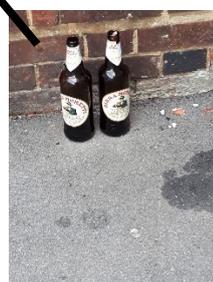
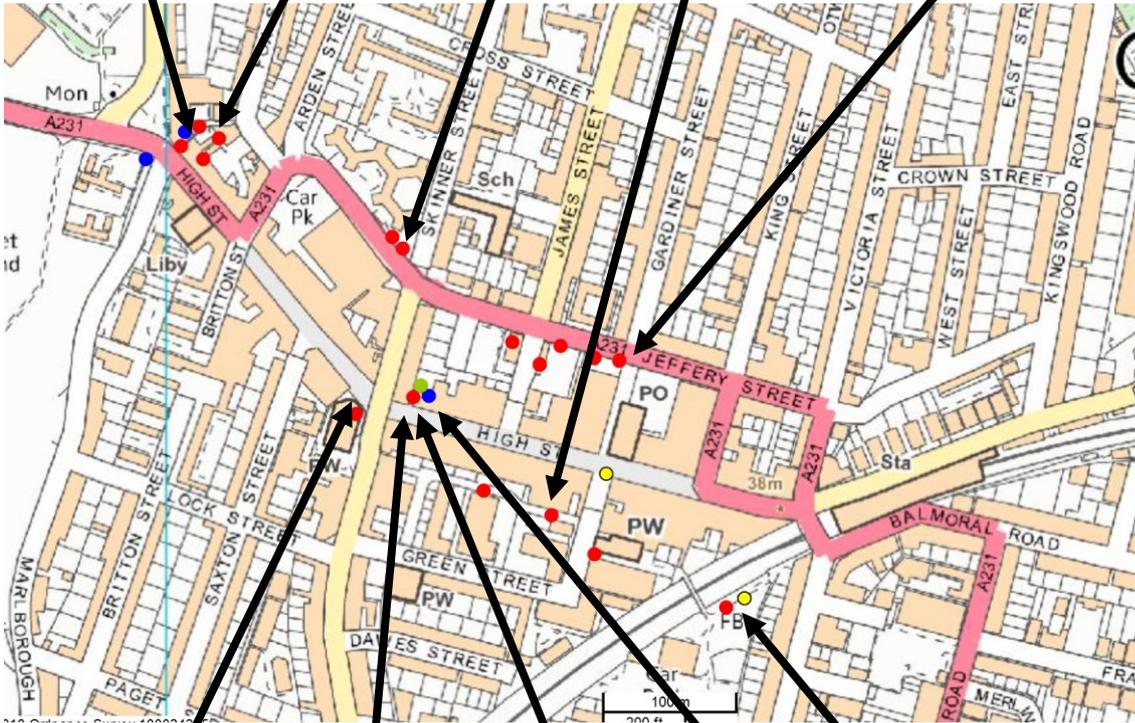
This litter consisted of bottles and cans of beer and cider, both 'super strength' and regular strength. Areas of particular concern were the alleyway off the High Street between Scope and Bet Fred where hundreds of discarded cans and bottles of beer and cider were photographed; Balmoral Gardens; the alleyways between the High St and Fox St, and in rough ground and the communal gardens to the flats bordering Jeffery St at its junction with Skinner Street, although discarded bottles and cans could be seen all over the area throughout the year.

The owner of one of the High Street shops was so concerned about people buying alcohol from his shop and then drinking in the High St he put up a notice asking people to stop drinking outside his premises (photo of the notice included on the map).

People drinking alcohol in Balmoral Gardens was witnessed by public health staff, who spoke to reception staff at the Healthy Living Centre and recorded complaints from the public about drinking and associated anti-social behaviour in Balmoral Gardens, which is detailed in the community section of this report.

Environmental enforcement reported to public health they had removed drug related litter from the following locations within the CIP area

- Arden Street – uncapped syringes
- Alleyway off the High Street - syringes
- The rear of Wilkinson's, High St – syringes
- Fox Street – syringes
- Balmoral Gardens – deal bags



2020

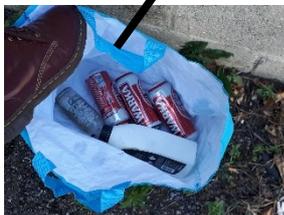
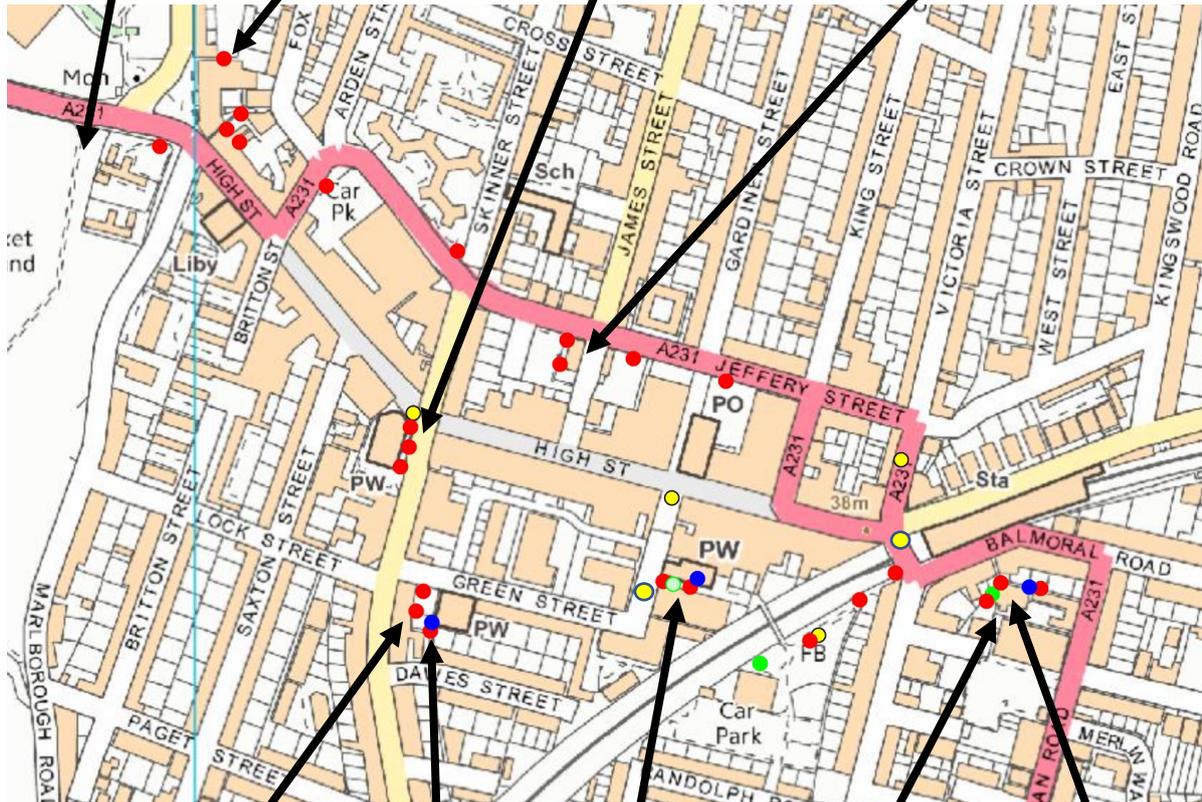
Due to the Covid 19 pandemic evidence gathering was restricted during this year and was almost entirely triggered by licence applications or was carried out pre March. Therefore, evidence is limited in both the times it was carried out, and the locations.

This litter consisted of bottles and cans of beer and cider, both 'super strength' and regular strength, and bottles of spirits. Areas where the litter was found were Balmoral Road/Duncan Road area, the alleyways between the High St and Fox St, in the flower beds around St Mark's church and in the car parks and the alleyways off Green St. However discarded bottles and cans can, generally, be seen all over the High Street and surrounding roads and alleyways. Much of the litter consisted of single cans and bottles but taken in totality there is a large quantity of it in the area. It can be seen over the period of time the evidence was collected the litter is ongoing and consistent.

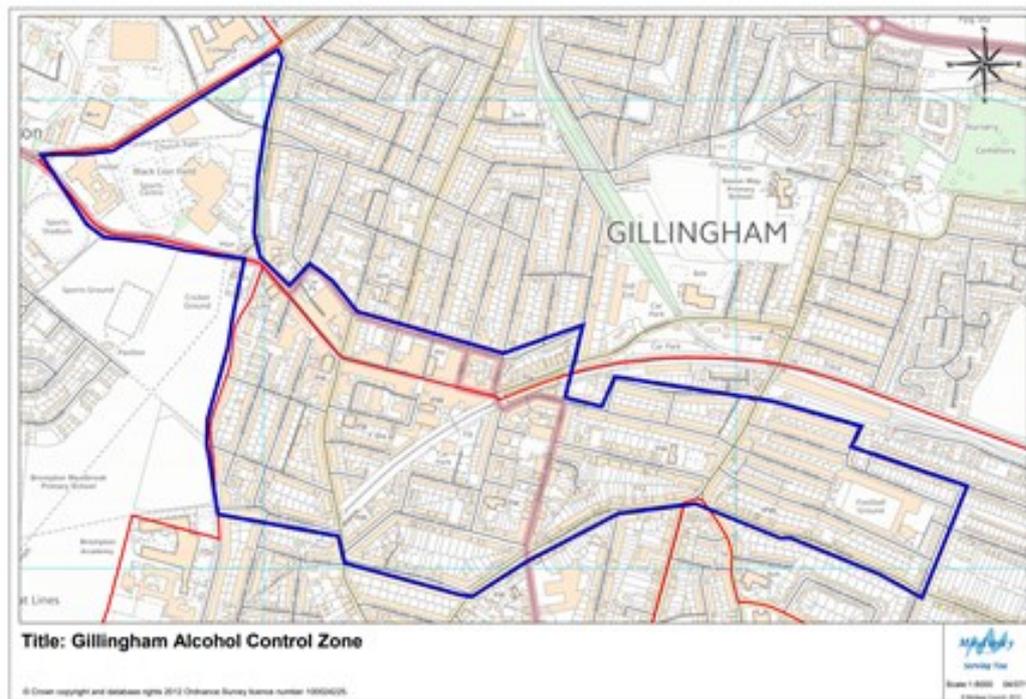
Street drinking was seen on multiple occasions by public health staff; at times before 0800 hours. A male was slumped on a bench, apparently intoxicated about 0745 hours, with open cans of beer and cider around him and on another occasion a group of four men and a woman were shouting and drinking beer and cider by St Mark's Church just after 0700 hours. On a third occasion a group were sitting on a bench in Balmoral Gardens near to the medical centre and children's play area drinking beer. This incident was witnessed at 0918 hours.

Drug paraphernalia was found in the flower beds surrounding St Mark's Church in the same area where alcohol litter was found and street drinking seen, as well as in the road in Green Street and in Balmoral Gardens, all co-located with alcohol litter. Drug litter was also found in several alleyways between Balmoral Road and Duncan Road.

There was a strong smell of urine and evidence of public defecation in the flower bed bordering St Mark's Church in Canterbury St, the alleyways leading off Balmoral Road and in a doorway in an alleyway between Green Street and the bridge to Balmoral Gardens.



## Public Space Protection Orders (formally Alcohol Control Zones)



Public Space Protection Orders (PSPOs), formally known as alcohol control zones, have been introduced in areas of Medway where there are proven issues with alcohol related anti-social behaviour.

The PSPO for Gillingham was adopted by the council in 2019 due to evidenced alcohol related anti-social behaviour in this area.

## Community comments.

Due to the Covid 19 restrictions it has been difficult to carry out community consultation. However, below are comments which have been submitted during the previous two years by public health in representations on licensing applications in the Gillingham CIP area. The comments are from members of the community and have been made in either statement form or during conversations with public health staff.

- **Shop manager in Gillingham High Street. Statement made in March 2019 in response to an off licence application for the High Street.**

*'There is an alleyway down the side of our shop [...]. We have been having problems with people going down the alley and into our back yard for many years, to such an extent that I've stopped my staff going to the back yard unless there's a delivery. The alleyway used to be gated but the gates were broken down because people were climbing over them and kicking them down. People sit in the alley out of the way, off the High Street, drinking and taking drugs. There are hundreds of cans of beer and cider. We try to clear it up but it's a never ending problem. These people also use the area as a toilet. It smells of wine and there are piles of poo everywhere, even to the extent that there is poo down the fire door [...]. Me and my staff have found syringes and what I think is a crack pipe in the alleyway and the yard. We think this is happening mostly in the evenings, but its difficult to say as we don't do down there during the day. I check the area daily to make sure no one is lying out there ill or worse, or to make sure there is no more damage to our building. On a more general comment I live locally and walk to and from work. Often as I walk through Balmoral Gardens, I see groups sitting and drinking. This is next to a children's play area and must be intimidating for parents and children. This can be in the morning but is normally seen at 5.30pm when I walk home. It is worse during the summer. Another shop selling alcohol is not beneficial for the High St area.'*

- **Record of conversation with between public health and reception staff at the Balmoral Healthy Living Centre, February/March 2019**

*The reception staff in the Balmoral Gardens Healthy Living Centre have described how they see street drinkers drinking beer, cider and vodka in Balmoral Gardens almost every day. The drinkers come into the centre asking to use the toilet, charge their*

*phones and are generally a nuisance due to their intoxication. The receptionists have witnessed the drinkers shouting and being generally anti-social in the park. The centre has found used syringes and other drug paraphernalia in the toilets, as well as empty alcohol bottles and cans. Parents come into the centre and complain about the drinkers and many have said to the staff they stop their children using the play area because of the drinkers in the park.*

# Appendix C

## Luton Cumulative Impact Assessment

### Introduction

This report outlines alcohol related harms in and around Luton Road and the adjoining Chatham Central ward area.

The evidence presented below covers

- Deprivation
- Alcohol related hospital admissions
- Public Space Protection Order
- Public nuisance in the form of
  - street drinking,
  - alcohol litter
  - drug litter
  - human waste
- Community comments

### Luton Road Cumulative Impact Policy area



Medway Licensing has recorded 15 retail premises licensed to sell alcohol for consumption off the premises in the Luton Road cumulative impact policy area, with many more in easy walking distance. (Medway Council Licensing, 2020)

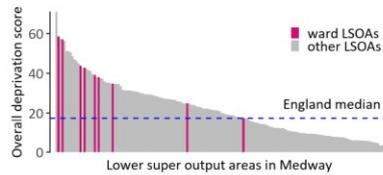
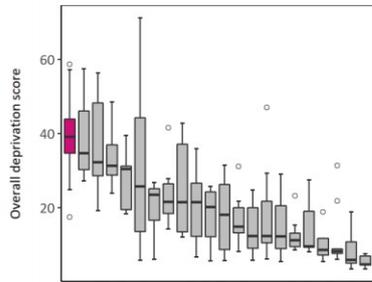


## Deprivation

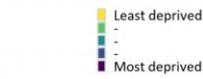
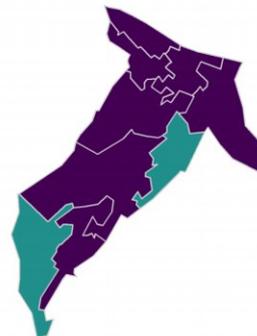
Luton and Wayfield and Chatham Central wards are the most deprived wards in Medway.

In 2014 Public Health in Medway commissioned a study into alcohol use in Medway. The result - Medway Alcohol: Insight (2014) - identified there was a clear link between alcohol related harms, hospital admissions, alcohol related crimes and deprived areas where there is a density of licensed premises.

# Deprivation



Indices of Deprivation 2015 (Department of Communities and Local Government), 2015

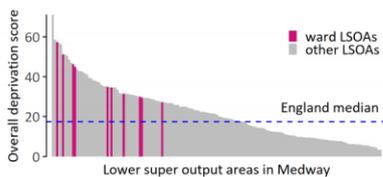
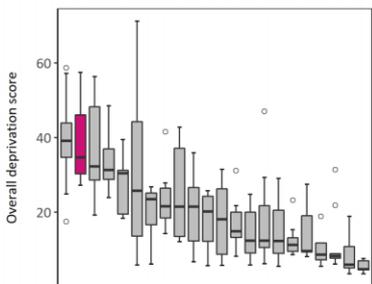


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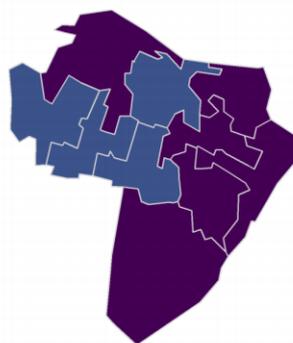
## Luton and Wayfield ward – Medway Joint Strategic Needs Assessment

<http://www.medwayjsna.info/profiles/wards/Luton%20and%20Wayfield.pdf>

# Deprivation



Indices of Deprivation 2015 (Department of Communities and Local Government), 2015

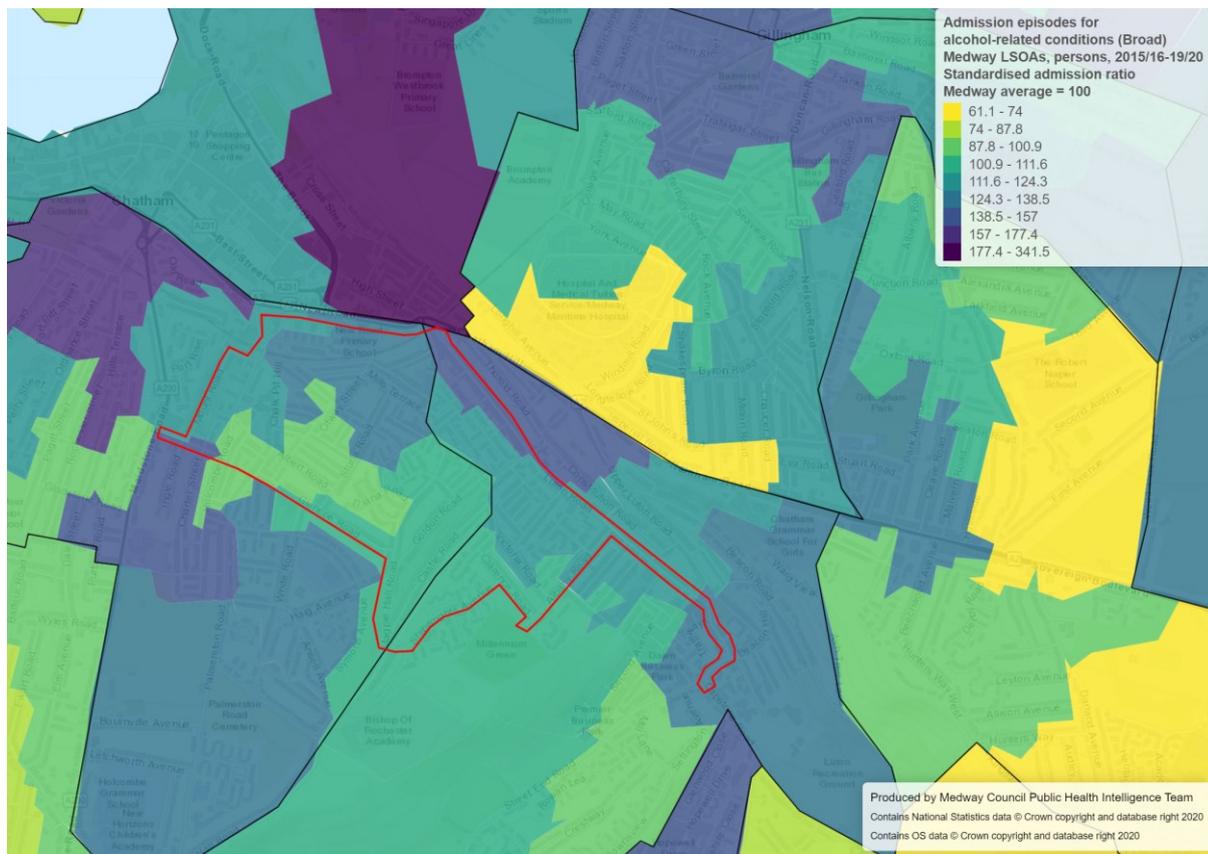


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## Chatham Central ward - Medway Joint Strategic Needs Assessment

<http://www.medwayjsna.info/profiles/wards/Chatham%20Central.pdf>

## Hospital admission episodes for alcohol related conditions (Broad)



Both Luton and Wayfield and Chatham Central wards have some of the highest rates for alcohol related hospital admissions in Medway.

### Alcohol related litter, street drinking and other alcohol related anti-social behaviour in the Luton Road area.

To provide a balanced and ongoing overview of the issues of street drinking and associated anti-social behaviour, evidence from 2018, 2019 and 2020 has been provided due to the issues of evidence gathering and monitoring of the public space and alcohol related harms in 2020 due to COVID 19.

The below maps show the locations where alcohol related litter has been found by, or reported to, public health officers. Additionally, the maps show where street drinkers have been seen or reported by members of the public, drug litter found by public health staff, and human waste found in the same locations as the alcohol related litter.

Photographs have been provided to give an indication of the types of alcohol related litter, drug related litter and evidence of human defecation and urination found during the 3 year period. The photographs are not intended to be more than an indication of the type of litter in this area and are not representative of the amount that has been recorded during this time, which runs into many separate items.

While there is evidence of areas where large quantities of litter is left, much of the litter consists of single cans and bottles. However, taken in totality, there is a substantial quantity of it throughout the area covered by the policy. It can be seen over the three year period the litter is ongoing and consistent in all the areas shown.

### Key to map

	<b>Alcohol litter</b>
	<b>Drug litter</b>
	<b>Public urination and defecation</b>
	<b>Street drinking</b>

### 2018

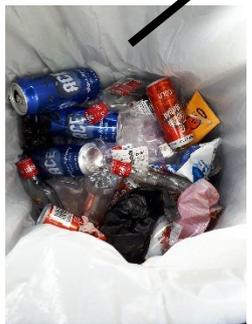
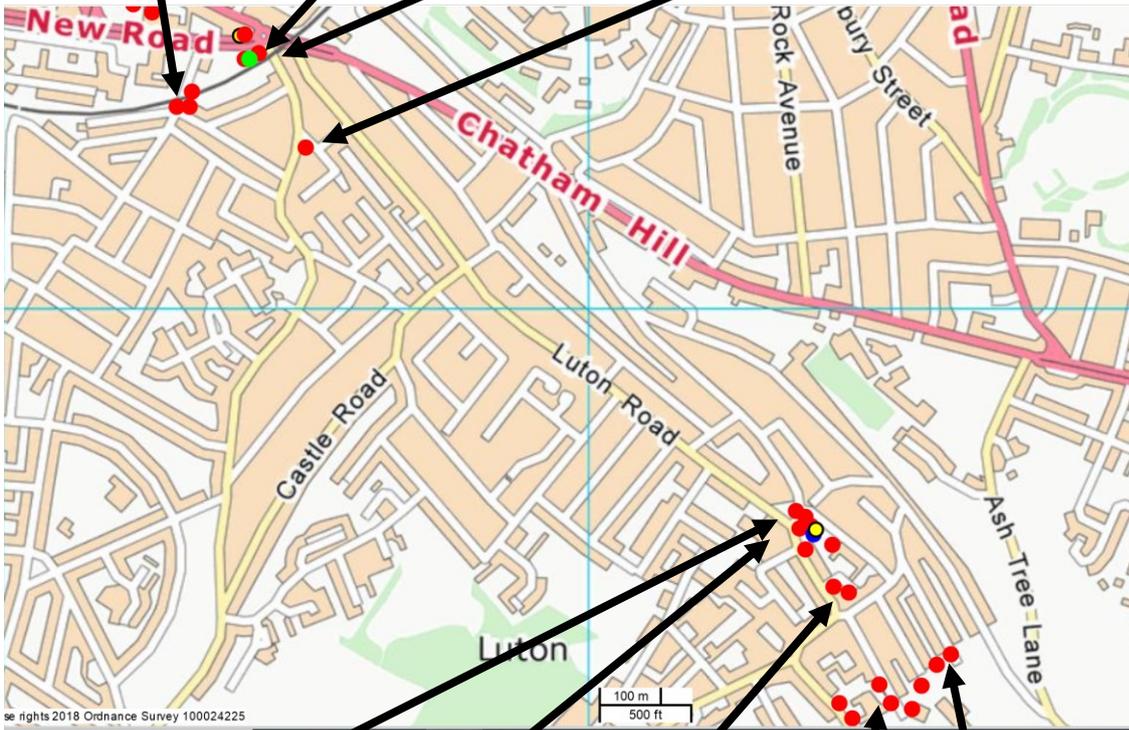
A member of public health staff walked around this area throughout 2018 and recorded ongoing evidence of alcohol street drinking, associated litter and alcohol related anti-social behaviour and nuisance in and around the Luton Road and Luton High Street.

As can be seen from the below map, alcohol related litter was found throughout the area. This litter consisted of all types of alcohol, from cheap superstrength beer and cider, to bottles of perry and spirits, particularly vodka. The area around the foot bridge over the A2, the railway embankment near to New Road school, the old graveyard at the bottom of Upper Luton Road and the area around Nelson Terrace were of particular concern.

During a visit to the area in response to a licence application a resident who lived opposite the old graveyard in Upper Luton Road stated there were always people drinking in the old graveyard and she believed drug use took place there as well. On a second visit a few days later the resident said that even though the weather had become cold and wet there was still drinking taking place in the old graveyard.

People working in the shops in Luton High St stated that groups regularly congregated around the benches in the seating area on the main road. These groups were seen drinking alcohol and were noisy and intimidating. People were regularly seen walking around drinking alcohol.

Another resident described large groups of young people congregating in and around Nelson Terrace causing a nuisance and engaging in anti-social behaviour. The resident described hour groups gathered in the library car park, the footpath in Nelson Terrace by the pub, the private car park at the end of Nelson Terrace and sat on walls along the road drinking alcohol. He also witnessed what he believes to be drug dealing and drug use in the library car park. The young people became drunk which led to shouting and swearing, which he was able to hear in his home. The empty cans and bottles were dropped in the street and into people's gardens causing litter. The resident reported he had witnessed public urination and defecation, particularly in the library car park. More generally he also saw people walking about the area drinking alcohol. He described how he often saw people sitting on the walls around the flower beds in front of the pub and the benches on the other side of Luton High St drinking. His full comments are recorded at the end of this report in the 'Community Comments' section.

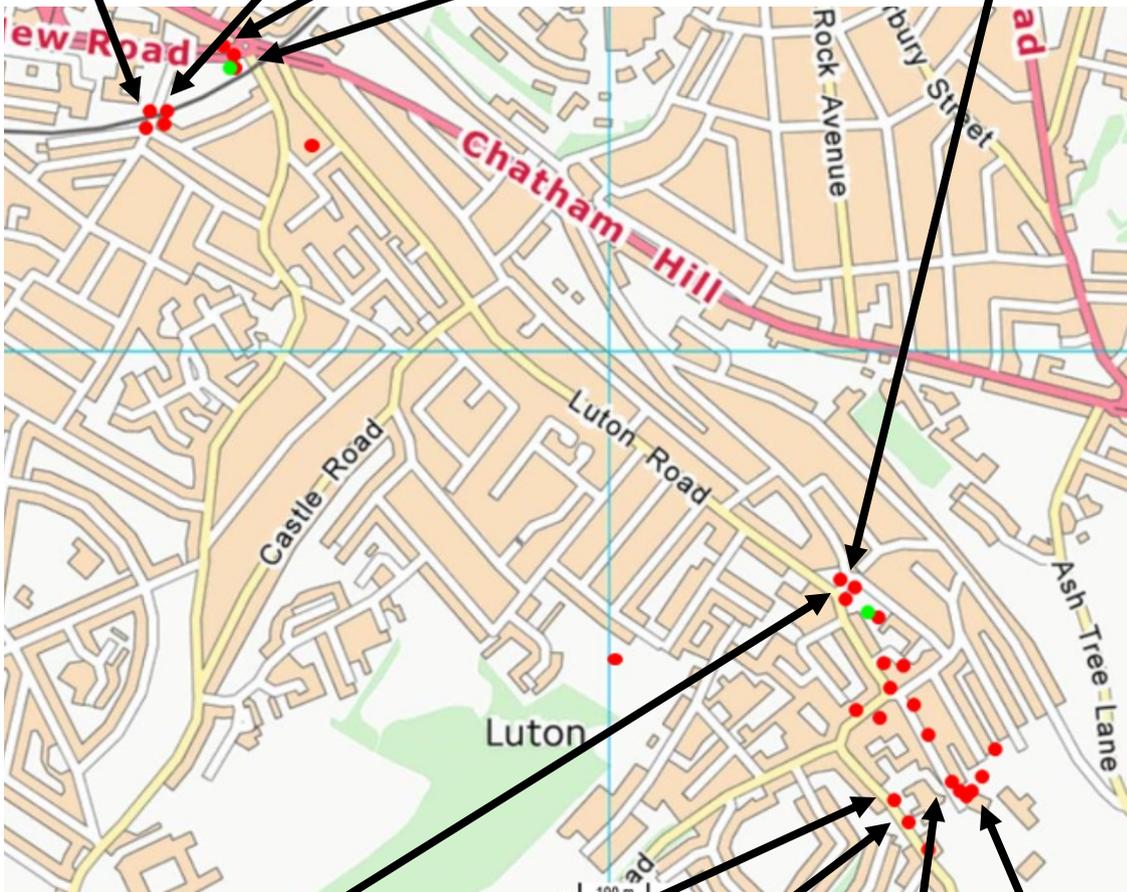


## 2019

A member of public health staff walked around this area throughout 2019 and recorded ongoing evidence of alcohol street drinking, associated litter and alcohol related anti-social behaviour and nuisance in and around Luton Road and Luton High Street.

As can be seen from the below map, alcohol related litter was found throughout the area. This litter consisted of all types of alcohol, from cheap superstrength beer and cider, to bottles of perry and spirits, particularly vodka. The area around the foot bridge over the A2, the railway embankment near to New Road school, the old graveyard at the bottom of Upper Luton Road, the area around Nelson Terrace and the footpath between Nelson Terrace and Queens Road were of particular concern.

Public health also spoke to members of the Arches Local community group concerning alcohol related harms in the Luton area, who stated very strongly that public drinking and associated harms, including drunkenness, domestic abuse, alcohol litter and associated drug use was a problem in the area and, in their opinion, was increasing. Their comments can be read below in the 'Community Comments' section.



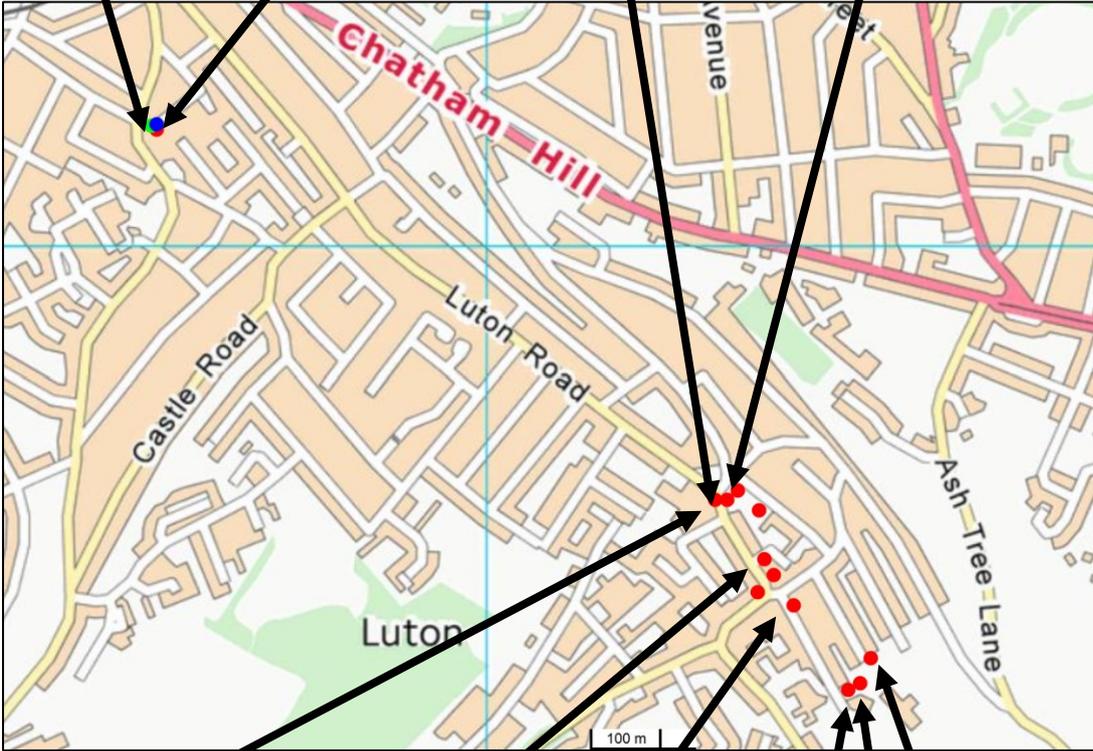
## 2020

Due to Covid 19 restrictions visits to this area were restricted to only those which were deemed necessary. Therefore, a member of public health staff only attended the area in response to a licence application in May and June of 2020 and recorded ongoing evidence of alcohol street drinking, associated litter and alcohol related anti-social behaviour and nuisance in and around Luton Road and Luton High Street.

As can be seen from the below map, alcohol related litter was found, with evidence of alcohol related street drinking and associated litter throughout the area surrounding the High St, even with the lock down due to Covid 19. This litter consisted of bottles and cans of beer and cider, both 'super strength' and regular strength, and numerous empty bottles of vodka.

Of particular concern was the old graveyard at the bottom of Upper Luton Road, where public health staff spoke to a resident. She confirmed people were regularly gathering at this location to drink alcohol and she suspected drug use was also happening. The resident described the behaviour as intimidating and unpleasant and the incidents of drinking had not decreased during the during the lock down period. The resident's evidence was supported by the alcohol related litter found in the graveyard, along with broken glass from beer bottles and evidence of public defecation.

Public health staff also spoke to another resident, who was clearing up litter at the nearby church. He said he found discarded beer and cider cans and empty vodka bottles every week where people throw them over the wall to the church grounds.



## Community comments

- **In 2019 public health staff attended the Arches Local community group and recorded the following questions and answers concerning alcohol harm in the Luton area. There were three participants. Following on from the comments are pictures of alcohol and drug litter sent to public health by this group to illustrate their concerns.**

**General comments** – *In general terms what impact does the sale of alcohol have on your community? Please describe the geographical area that is covered by your comments.*

Alcohol is the biggest killer here. There hasn't been a reduction in consumption or litter. Public drinking has got worse. There's more homelessness, more temporary accommodation, more HMOs. This has led to a huge influx into the area from outside Medway and they have brought their problems and dependencies.

**Crime and disorder** – *How alcohol impact on crime and disorder in your community? Examples may include alcohol related violence, disorder, damage and anti-social behaviour. Please give specific examples if possible.*

Many of the shops along the road sell cheap illegal alcohol. I've heard people being offered cheap vodka and cheap tobacco.

Alcohol related crime, like fighting hasn't gone down. We see fighting in the streets. There's a lot of super strength alcohol sold in the shops and this leads to drunkenness and fighting. It affects us and residents indirectly as alcohol related crime is all around us.

There's use of drugs and drinking in public places. I've seen someone shooting up at the bus stop.

There's a lot of drug taking around Luton junior school field. 'Fit and Fed' is held there during the summer holidays. I was looking around and I found 4 semi-conscious people lying on the ground near to the field where the kids were playing, one with a needle hanging out of his arm. I just backed off and left them and called the police.

People come to the area to buy drugs and if they can't find them, they buy alcohol. All the shops sell super strength beer and cider and it's really cheap.

There's a massive problem with theft of alcohol from the shops. The shop owners are always telling us there's a problem.

If you look at a spider diagram of all of this with alcohol in the middle - People commit crime; they're drunk or drugged or both, and alcohol is the common thread.

Alcohol related DA (domestic abuse) is huge. I see the black eyes. The aggression has an effect on children. They tell us. Parents turn up at school drunk and are aggressive to their children.

**Public nuisance** – *How does alcohol impact on public nuisance in your community? Examples may include noise, street drinking, litter, public urinating, and defecating. Please give specific examples if possible and include photographs if appropriate.*

We had a litter pick at Arches heights, through the door in the hoarding, which has now gone. We took away hundreds of cans a month or so ago. There are people living rough there using drugs as well.

Street drinking is all over the place. Its normal. It's by the footbridge, the area outside Go outdoors, Debenhams and the back of the NCP cark. There is always drug use and street drinking in Town Hall Gardens, right by the children's play area.

The shops in the area say they don't want to sell the super strength stuff but they have to so they can make money. We are suffering from the proliferation of shops selling cheap super strength alcohol. White cider is killing people.

**Public safety** – *How does alcohol impact public safety in your community? Examples may include concerns about broken glass, unconsciousness due to alcohol consumption and alcohol poisoning. Please give specific examples if possible.*

There is broken glass everywhere. Cans of beer and cider which can be jagged and sharp. We find sharps (syringes) in the same places as where people drink so drug use is co-located in the same places where there is public drinking.

**Children** – *How does alcohol effect children in your community? Examples may include underage sales, underage drinking, both in private and public and anti-social behaviour associated with children fuelled by alcohol. Please give specific examples if possible.*

Children are drinking from an early age. From 11 up, maybe even younger. Drinking has become normal because it's so cheap people drink at home, and children see it as normal.

Alcohol causes aggression which has an effect on children. They tell us their parents get drunk. We see parents turn up at school drunk to pick up their children and are aggressive to the children.

The children also see the drinking on the streets, and it becomes normal.

**Any other comments** – Are you aware of the licensing policy and/or the CIP or SAP? Has the policy had any impact on licensable activities? Have you used the policy for any reason? If you have can you give examples.

We still need the CIP to protect us from the proliferation of shops which sell super strength alcohol. We don't need any more. We need to reduce the number of ones we have, or at least stop them selling the cheap, strong beers and ciders.

When the new Local Plan comes in, Luton Road will be removed from the designation of 'High St' which means it's likely there will be more HMOs, leading to more people with problems and more drinking.

We have used the policy and CIP when a pizza takeaway applied for extended hours and we objected.

We are aware that two off licences have been refused in the area which we support.

We want to support businesses which sell alcohol responsibly, like a decent café/restaurant where cheap alcohol isn't the main thing being sold. What we don't want are more off licences. We don't need more as there are too many.

Millennium Green, Albany Road, Luton



Shipwrights Avenue, Luton



Shoppers car park area, Newnham St, Luton



- **Comments and photographs from a resident of Luton in response to an e mail from public health to community groups regarding this consultation.**

*'I have attached images below. Sadly, I was too late to capture the bottles and cans left on the graves, they have been bagged up in the image below.*

*I continue to support this policy and hope it will be renewed in due course. If anything, I would like to see more enforcement in this respect.*

*Alcohol litter is regularly left on and around walls of properties in Luton Road, as well as in the gutter or dropped into the brown bins. I have seen regular alcohol litter in the streets and in particular, grounds of the old graveyard opposite Christ Church. The street drinkers have sourced a couple of chairs for their convenience.*

*On returning from an evening meeting, I passed the off licence in Luton High Street and was approached to buy alcohol. Other local residents have mentioned similar stories or requests for money.*

*It is a fairly regular sight to see men walking along swigging from a beer can even at 9am where there is plenty of foot traffic to the nearby Luton School.*

*Emergency services were called regularly to one neighbour recently, who has since been moved. Her home had no food but many used bottles of alcohol and soft drinks along with drug paraphernalia. I don't believe this to be an isolated incident as we had similar issues with [another] property and its residents. These drink and drug issues affect how residents feel about the area both generally and in terms of personal safety.'*



- **Resident 2 – Comments and photographs from a resident of Luton in response to an e mail from public health to community groups regarding this consultation.**

*[...] has asked me to give you some feedback about my experiences regarding the drinking problems and debris as a result of this. I have for several years taken photos of general litter whilst out walking the dog. It gets worse. A great deal of the photos includes drink cans & bottles. My walks unfortunately are limited to North Dane Way, Hopewell & Kingfisher drive, Heron Way, Downsview, Street End Road & the Coney (Daisy) Banks. I have made it known to the Council via FixMyStreet*

*That seems to work quite well regarding some reports but not all. This may not be in your area but if you look at Medway as a whole it is a tip. Councillor Jarrett is full of praise about the attractions of Medway for Tourist and indeed the application for "City of Culture" and I agree with his remarks if only the litter problem including drinkers is approached with a bit more discipline starting with the police being more active. Street End Road should be included in your survey as it is a regular dumping ground as from Mill Lane to nearly up to Bankside it is house free. There are regular motorist throwing bags of empty drink cans and small glass bottles out of their car windows and of course fly tipping is made easy by the Chatham bound Mill Lane bus stop over the bank. These car people to me are as bad as the walking can wielding contingent. I have asked for a good team of people with quality surveillance cameras to catch and make examples of these offenders that do not care. The cost could be offset by the fines and community service punishment dished out showing the taxpayers that it is not all coming out of our pockets clearing up.*

*I brought up another problem at a PACT meeting from complaints made there about using Luton Church Yard as a toilet. My point to them is where does anybody go in Luton now if taken short, there was a toilet years ago by the "Hen & Chicks" but this like others in the town are considered bad places perhaps so are we are all "Robots" and have no human needs of this nature anymore?*

*I am not sure what to attach regarding drink litter but will try to find images in your area if I can.*

*My walks mainly [...]*

*Up Street End Road onto Barnfield then back along the Coney Banks to Pheasant Road down into 2nd Avenue up Third Avenue back to Settington Avenue [...].*

*Street End Road is probably worse [...]. But the Footpath from Street End up to Magpie Hall road is pretty bad too. One place 100 yds up on the right after the newbuild fence in the bushes is swamped with plastic bottles.*

*The place I feel is very bad is Hopewell drive and into Kingfisher but sadly Somerset Close has residents dumping rubbish either on the bank outside their back gates in North Dane Way and recently blocking the footpath down to Hopewell drive with Mattress and Base Unit.[...] Most footpaths I negotiate seem untouched by street cleaners and another notorious route is up from Hopewell Drive to Shanklin Close. I am surprised that Shanklin Close residents do not react to this constant eyesore outside their homes. The roof photos I included in the previous message show bottles thrown down from this path that is a constant dumping ground. The Unit there I am also surprised have not noticed. Further on there is another footpath leading up to Downsview with signs of drinkers. We have tins and bottles in our garden probably from the same people crawling home.*

*Carrying on my tour of the neighbourhood past Hopewell drive I walk up Kingfisher Drive and right up the end before the hill on the right is a footpath both up to Heron Way or turning left up behind the school. There are enough beer cans discarded up this path and taking the next right up the top to Heron Way again a Motherload of same to fill several big bags or more. The main litter problem is far greater though.*





(The resident sent over 30 photographs of alcohol related litter in the area described. The ones above are an illustrative selection).

- **Statement given by a Luton resident to public health in response to a licensing application in 2018.**

*'I have lived in my house for over forty years. I look out over the Hen and Chicks pub car park and the library car park. There are regularly large groups of young people ranging in age from mid-teens to early twenties, gather in the road and library car park. On one occasion I counted forty three people in one group. I have seen people turn up with ruck sacks containing what appears to be beer and cider, which is given out to members of the groups. I have also seen cars turn up and small packages exchanged, which I believe to be drugs. The groups then then d to make their way to the bottom end of Nelson Terrace where they gather in the small private car park. The groups can often take up the whole of the footpath making pedestrians walk in the road. Members of the group shout swear and spit with is very anti-social. I have seen them urinating up walls and in the library car park. They also defecate, often behind the wall in the library car park, and in the alleyways around the areas. Alcohol use fuels a lot of this behaviour and it is obviously very easy to get hold of as the groups get it all the time. When they are finished drinking, they then tend to drop the empty cans and bottles along the road and in people's gardens. As these groups drink more, they get drunk and the noise gets louder and the behaviour more raucous. They are intimidating and the language is very unpleasant. This behaviour happens throughout the year in carry degrees.*

*Generally, around the village people are always walking about drinking alcohol from cans and bottles. There is broken glass from smashed bottles everywhere. People gather and drink alcohol in the High Street outside the pub and on the benches on the opposite side of the road.'*

## Appendix D

### Rochester Cumulative Impact Assessment

#### Introduction

This report outlines alcohol related harms in and around Chatham High Street area covering parts of both River and Chatham Central wards.

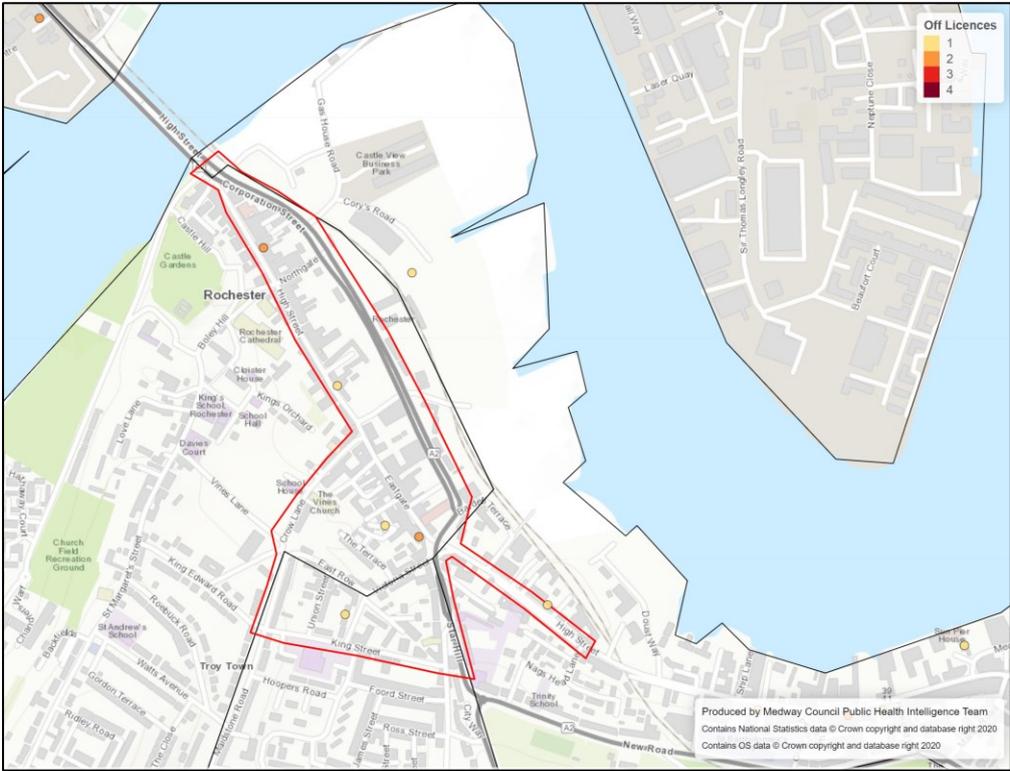
The evidence presented below covers

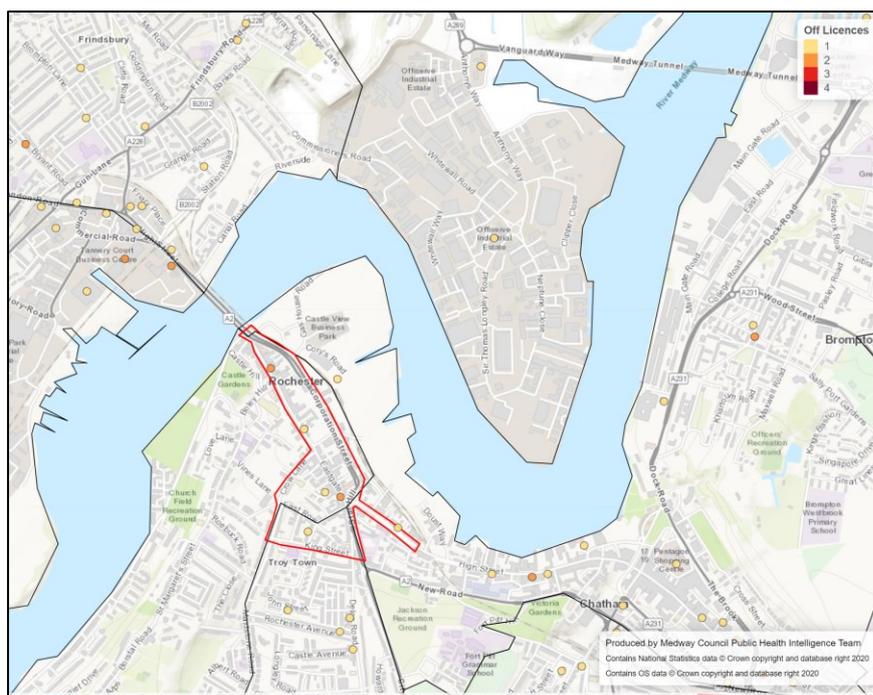
- Deprivation
- Alcohol related hospital admissions
- Public Space Protection Order
- Public nuisance in the form of
  - street drinking,
  - alcohol litter
  - drug litter
  - human waste
- Community comments

#### Rochester Cumulative Impact Policy area



Medway Licensing has recorded 8 retail premises licensed to sell alcohol for consumption off the premises in the current Rochester High Street policy area, with many more in easy walking distance, particularly in Strood and Troy Town. (Medway Council Licensing, 2020)



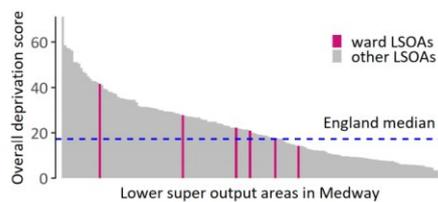
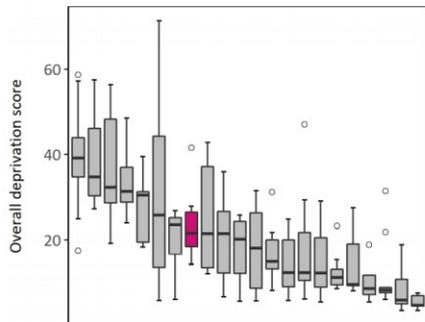


## Deprivation

The surrounding areas to Rochester High Street have some high levels of deprivation. The top area of Rochester East ward is very deprived and is within the CIP area and River ward, which runs along the edge of the area is one of the most deprived in Medway.

In 2014 Public Health in Medway commissioned a study into alcohol use in Medway. The result - Medway Alcohol: Insight (2014) - identified there was a clear link between alcohol related harms, hospital admissions, alcohol related crimes and deprived areas where there is a density of licensed premises.

# Deprivation



Indices of Deprivation 2015 (Department of Communities and Local Government), 2015

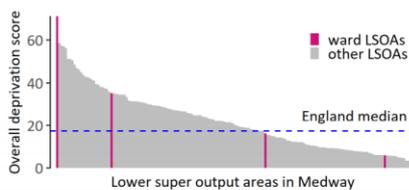
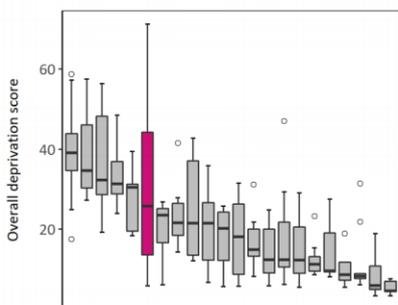


Least deprived  
-  
-  
-  
Most deprived

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Contains OS data © Crown copyright and database right 2019

Rochester East ward – Medway Joint Strategic Needs Assessment 2021  
<http://www.medwayjsna.info/profiles/wards/Rochester%20East.pdf>

# Deprivation



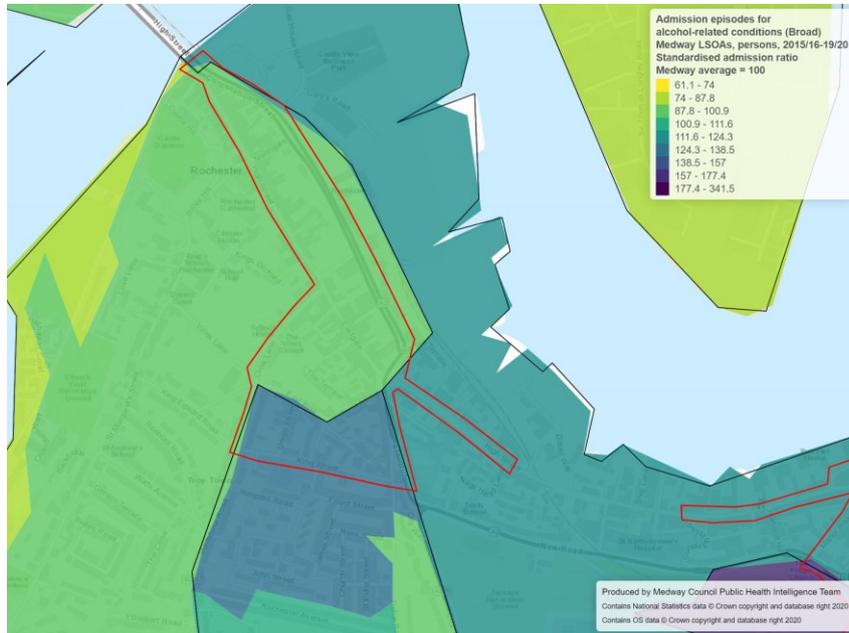
Indices of Deprivation 2015 (Department of Communities and Local Government), 2015



Least deprived  
-  
-  
-  
Most deprived

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Contains OS data © Crown copyright and database right 2019

### Admission episodes for alcohol related conditions (Broad)



The lower area of the CIP in Troy Town has a rate of alcohol related hospital admissions.

Alcohol related litter, street drinking and other alcohol related anti-social behaviour in the Chatham High Street area.

Little alcohol related litter was found in the Rochester High Street area during the 2018 to 2019 period. There was only one visit to this area in 2020 due to the Covid 19 pandemic restrictions, which was in response to a licence application.

On this one occasions alcohol litter was found in quantity in an area under the railway arches by Gas House Road.



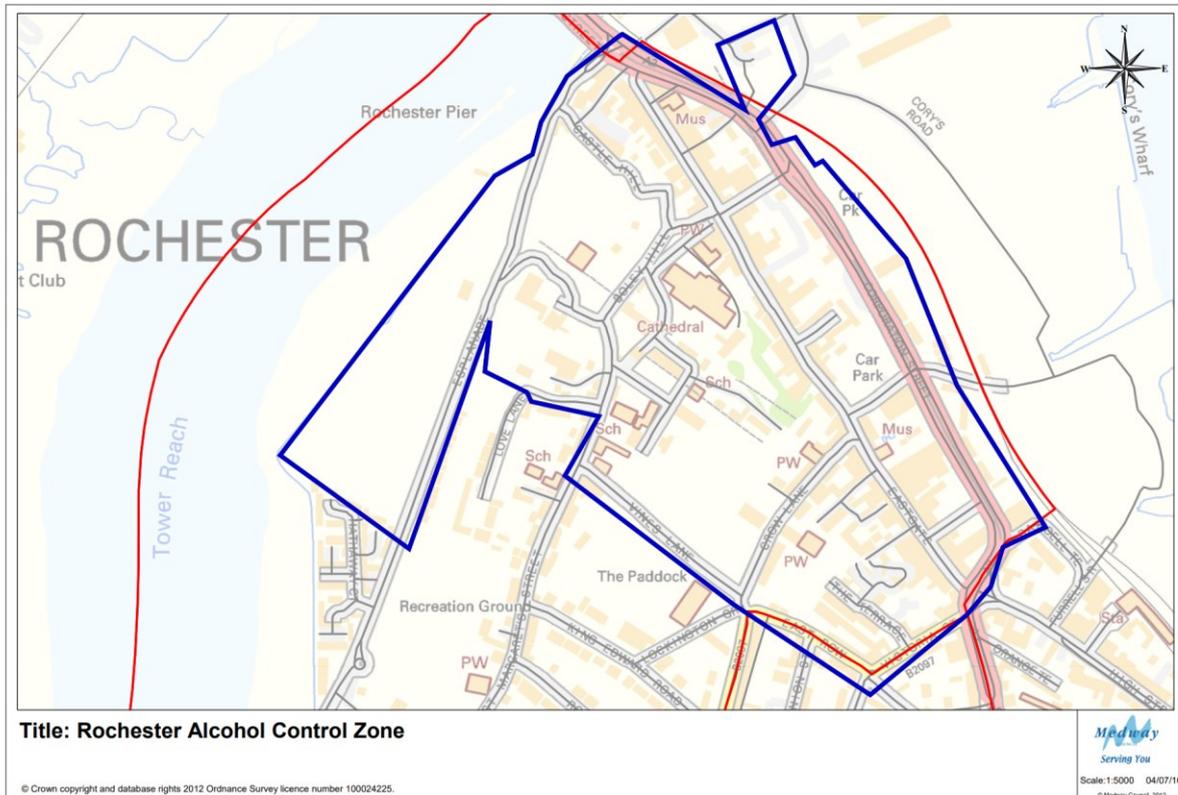
There was also evidence of defecation and urination in this area. In 2019, on four occasions in November and December, environmental enforcement officers had reported to public health they had found and removed drug paraphernalia in this area as well. This consisted of quantities of syringes, syringe wrappers and caps, sharps boxes and citric acid wrappers.

During 2019 environmental enforcement officers also reported they had removed drug paraphernalia from the following locations in Rochester High Street area

- The Cathedral area – packs of unopened syringes and citric acid wrappers
- The Registry Office – syringes, spoons and sharps box, which was full of used syringes.
- Blue Boar car park – 8 syringes and wrappers, spoons, and alcohol wipes.

However, even with a lack of alcohol litter, street drinking and begging was regularly seen by public health staff in the High Street during 2018 and 2019 during evidence gathering visits.

#### Public Space Protection Orders (formally Alcohol Control Zones)



Public Space Protection Orders (PSPOs), formally known as alcohol control zones, have been introduced in areas of Medway where there are proven issues with alcohol related anti-social behaviour.

The PSPO for Rochester was adopted by the council in 2019 due to evidenced alcohol related anti-social behaviour in this area.

### Community comments

- **Councillor Stuart Tranter – Cllr Tranter asked for his comments to be attached to the public health report.**

*I am concerned that ongoing policies are influenced unduly by exceptional data (i.e., covid) but there is some evidence which is still relevant, albeit amplified during covid. Most of what follows is based on my personal observations or reported to me.*

### *Public urination:*

*I have received complaints relating to the following areas:*

- *Bishops Walk*
- *Blue Boar Lane (by city wall)*
- *Visitor Centre*
- *Guildhall Museum*
- *Esplanade (esp near Hathaway Court)*
- *The Vines Park*

*The problem was worse during the pandemic when venues were open, but difficult to 'pop in' to use facilities, however it has been an issue long before that. While predominantly offenders were male, some were female.*

### *Noise/rowdy behaviour:*

*This affects particularly the High Street, Crow Lane, St Margaret's Street and Maidstone Road late at night when people are returning home; particularly within about 1km of the centre and diminishing the further out you go. There have been reports of fights, but generally exaggerated. For example, one incident gets reported by different people slightly differently creating the impression there were several incidents when there was only one. Even so, any confrontation is very stressful for residents and witnesses.*

### *Illegal Gatherings*

*This involved music systems, noise and drinking and affected the Castle Gardens and Esplanade. The moat and vines are also included, but not quite as severe. Most drinks were purchased as off sales, but we do not know where (i.e., locally or brought in by car). This has always been an occasional issue but made worse during the summer when many pubs were closed or restricted.*

### *Begging*

*There is a direct correlation between begging and the opening hours of venues, with Friday and Saturday evenings being the busiest. I have counted up to 12 at any one time, but typically around 6 to 8 at weekends. Some are aggressive, and on occasions arguments occur between them. During Covid this reduced considerably. The majority of beggars in these instances are known not to be homeless, and almost all resist help and support. It is anticipated the problem will increase as normality returns. Council outreach teams provide help for genuine cases, so we are fairly confident the majority of those remaining are either not genuine or resisting all help.*

#### *Litter*

*Inevitably this is far worse during busy times, but in central areas is very tightly managed by the council, hence by and large the public do not see the impact for very long.*

#### *Vandalism*

*Most drunken behaviour is mindless; for example, pulling up plants from baskets or pots (esp town centre), moving temporary road signs (in Historic areas I have often retrieved them), throwing cones into the river (I arranged for Conways - the bridge contractors to retrieve many), walking over cars, breaking wing mirrors by kicking. Some shop windows have been broken. Many of these issues are too minor to report as criminal damage, so are not recorded, but they are a direct result of alcohol consumption.*

#### *Conclusion*

*While the level of various cumulative impacts of alcohol consumption has varied up or down at different times during the pandemic according to the restrictions at different times, issues have continued to exist. I believe it would be a mistake to make any changes to the current strategy based on the experience of the past year. This is because there is no evidence to show underlying behaviours have changed at all even though there has been a reduction in the past year. I would hope a review could be*

*done again later, when more venues have returned to more normal operations. Prior to 2020 I believe there was no increase or decrease in issues.*

- **Resident 1 – Rochester High Street**

*'First of all, I would like to say thank you for the opportunity to comment on this subject and I am writing to you in my capacity as Chair of The Rochester City Centre Forum and also as a resident.*

*Being passionate about Rochester has been my mantra for the 46 years I have lived here – close to the centre and I have seen how the impact of excess alcohol drinking affects the community as a whole.*

*I think I speak collectively for the whole committee that we want to be encouraging a daytime and evening economy – NOT a night economy.*

*What we would like to see is that the majority of people eating and drinking in the High Street are on their way home by 12.00am.*

*That would mean that music would stop and generally the selling of alcoholic drinks by then.*

*Many people live in and around the High Street – it is a densely populated residential area – night time noise has been a real problem.*

*Within a few years, there will be another 2,000 homes built within walking distance of the High Street. Those that live close by need to be protected from noise and anti-social behaviour.*

*Some personal examples of ASB:*

- *We live opposite St Margaret's Church in Rochester, just up from the High Street. It is a route home for many people. Several times a month (mostly in summer) we have people sitting in the lychgate, drinking, smoking weed, peeing behind the wall (or worse down by the tower!) shouting, arguing, or talking and laughing very loudly. There have been several occasions when I've stood at my front door at 2 or 3.00am in the morning and had to ask them to be quiet or move on.*

- *I have organised the planting of the flower baskets and tubs in the High Street – cans and bottles have been placed in some of the lamppost baskets (must have been incredibly tall or on someone’s shoulders!)*
- *Plants and trees in tubs have been yanked out overnight.*
- *Very often going down first thing in the morning after a weekend – at least once or twice a month, there are smashed shopfront windows – as if someone has barged in or been shoved hard.*
- *There is still (not during lockdown – blessed relief!) a problem with filthy bedding, cardboard, remains of takeaway food left in shop doorways.*
- *Begging by men and women ‘out of their tree’ is constant and I have witnessed people shooting up alongside the Vines church.*
- *There is a real problem with beggars coming from all over Medway and beyond on Thursday, Friday and Saturday evenings and setting up camp near the pubs and restaurants and cash machines. The problem is exacerbated by ‘well-meaning’ members of the drinking public who hand out £5 and £10 notes when asked, like sweets in some cases.*

*I know from speaking to High Street residents, that the level of noise in the early hours of the morning (and sometimes later) is unbearable at times – especially in summer when windows need to be open and people stay out longer.*

*I spend a lot of time in the High Street and am down there nearly every day – I talk to lots of people and am really engaged with what is going on.*

*Our litter teams are fantastic but can’t keep up with the amount of litter and of course the removal of bedding is a long-term problem.*

*It’s been really good to see so much more of a police presence – they do a fantastic job but need to be helped by sensible measures and boundaries being put in place.*

*Our High Street is a vibrant and stunning place to be; lockdown has proved that with so many people discovering what Rochester has to offer and many of our retail shops have managed to keep trading and become more creative online and increased business. Our takeaway food businesses have also upped their game incredibly and provided a brilliant service.*

*Tourism is vital to Rochester and with society changing and people demanding more of an 'leisure experience' when they visit our High Street – we need to do everything possible to keep it a safe community at all times and one that is kept looking beautiful. As a Forum – we are doing our best to support that.*

- **Resident 2**

*The difference to our quality of life living in Rochester during the lockdown has been absolutely profound with the closure of licenced premises. The nights are quiet, our sleep is restored, and antisocial behaviour has largely been erased.*

*Fights and anti-social behaviour are a regular occurrence in 'normal' Rochester nightlife. We are often woken, from Thursday night through until Sunday by revellers swearing, fighting, loud cars blaring horns at all hours. It is not uncommon to have large groups of people congregating under the influence of alcohol with all the associated noise issues one would expect. The area outside my house is used as a urinal. The location to the side of my house is used for drug taking as it is out of sight of CCTV cameras.*

*I had not realised until the lockdown just how many alcohol-related events occur that I don't even respond to anymore because they have become so commonplace. I have copied below an email I sent to my ward councillor with regard to one fight witnessed outside my home in July 2019 as an example of incidents witnessed pre-lockdown.*

*I witnessed a big fight outside my house at 3.30am this morning. It was a mixture of pushing and shoving but one man was bare-chested, and another had a belt in his hand as a weapon. The bouncers from the Casino Rooms broke it up, but I have just washed away a large amount of blood from outside my house and against next door's wall so someone must have been quite badly injured, which I hadn't realised at the time. Not sure if the police will have been involved as the bouncers handled it, but it must have been quite nasty.*

*As an addition, our female homeless woman with the bun who sits at the door of the Post Office was running around the group, looking unsteady on her feet and then ran away. That's the first time I have ever seen her during the night.*

*The difference to our quality of life as residents during lockdown has been monumental. That's not to say that issues haven't arisen in the past year. During the summer of 2020 when restrictions were less severe, large groups of youths were congregating on the High Street, drinking, and using laughing gas. There was an air of menace about these groups, behaving as though they were untouchable, and this matter particularly concerns me with regards to the unlocking of restrictions in the coming weeks.*

*My main concern is that people who have been locked down will over-indulge when the restrictions are relaxed. I worry that Police resources will be overwhelmed, and residents will be on the front line of uncontrollable behaviour. In my opinion the cumulative impact policy for Rochester High Street ought to remain in place.*

*When considering the incidence of trouble caused by excessive alcohol consumption in Rochester it must not be forgotten that the perpetrators have homes to go to. On their way there from the High Street they will often express their feelings about an unsatisfactory night out by causing damage to property, shouting, vomiting, or littering. Even when escaping direct damage, sleep deprivation adversely affects health.*

*I don't record window glass breakages or disturbances because of their frequency, but a more serious incident occurred during the night of 6/7 April 2019 when someone attempted to kick in my front door and succeeded in smashing a pane of Flemish patterned glass and one of bullion glass. The latter is expensive and not easy to obtain. The photograph below illustrates the damage. There was a foot mark on the door to the right of the pane.*



*During the periods of lockdown in 2020/21 I have realised how pleasant it can be to live near the centre of Rochester – and how different from the noise, drunkenness and violence that polluted the High Street before Covid-19. I fear the consequences of a return to what we had to suffer from since licensing restrictions were relaxed. There doesn't appear to have been any improvement between the time that Rochester High Street became a cumulative impact area and the onset of the coronavirus, but I believe the Cumulative Impact Policy should remain unchanged.*

- **Resident 3**

*My comments below are mainly directed towards Rochester High Street*

*I visit Rochester High street almost daily but normally only during daylight hours.*

*During the few times that I have gone out in Rochester in the evening, I have noticed a different atmosphere to daytime. Accompanying visiting friends have commented that they didn't feel safe in the High Street with hundreds of loud, noisy, mainly young people, massing in the street, drinking & shouting. As a result, we take them elsewhere for meals & entertainment. This is such a shame because most restaurants in Rochester are brilliant & serve excellent food.*

*In view of the above, I cannot really give first hand experiences of evening incidents as I try to avoid going into Rochester at that time, but I regularly see the repercussions when visiting during the day. I also speak to friends who live in the High Street who tell me horrendous stories that occur in the evening.*

*Daily I see rubbish strewn in doorways and basically anywhere but in the bins.*

*Vagrants bedding in doorways is not a good look either.*

*Last year, when we could all still get our haircuts, I was in my regular barbers, [...] (near the post office) & noticed a badly cracked front window. Apparently, it had happened the night before.*

*The owner showed me a copy of the CCTV coverage which clearly identified a group of youths passing the shop and one of them, for no apparent reason, physically attacking the window and then they all walked off. The owner reported the matter to police but despite the clear CCTV coverage, no action was taken, leaving the owner with a substantial repair bill.*

*Also, last Autumn, I was spat at (a vile thing at the best of times but even worse during COVID) in broad daylight by a young male beggar when I refused to give him any money. Unfortunately, he was too quick for me and ran off.*

*I certainly do not support any licensed premise opening beyond 12am or any increase in the number of licensed premises*

*Our High Street needs protecting and to be looked after.*

James Williams

12<sup>th</sup> March 2021

Director of Public Health