



Serving You

Licensing Act 2003
Draft Cumulative Impact
Assessment

May 2024 to April 2027

Introduction

This assessment and associated Cumulative Impact Areas were approved by Full Council on 18 April 2024 and put into effect from 1 May 2024. Unless brought for review at an earlier time, a Cumulative Impact Assessment is valid for a period of three years, therefore this assessment will expire on 31 April 2027.

What is Cumulative Impact?

Cumulative impact is the potential impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area.

Cumulative Impact Assessments may relate to premises and members clubs licensed to carry out any licensed activity, including the sale of alcohol for consumption on or off the premises and the provision of late-night refreshment.

The Home Office guidance describes a Cumulative Impact Assessment as a 'strong statement of intent' about an authority's approach to licence applications. A Cumulative Impact Assessment will explain that it is likely that granting further premises and or club premises certificates in an area would be inconsistent with an authority's duty to promote the licensing objectives. The effect of adopting a Cumulative Impact Assessment is to create a rebuttable presumption if relevant representations are received. This means that applications for new premises licences or club premises certificates or full variations will normally be refused, unless it can be demonstrated that the operation of the premises involved will be unlikely to add to the cumulative impact already being experienced.

The Section 182 Statutory Guidance sets out the steps to be followed when considering whether to publish a Cumulative Impact Assessment; these include:

- Identify concern about crime and disorder; public safety; public nuisance; or protection of children from harm.
- Consider whether there is good evidence that crime and disorder or nuisance are occurring, or whether there are activities which pose a threat to public safety or the protection of children from harm.
- If such problems are occurring, identify whether these problems are being caused by the customers of licensed premises, or that the risk of cumulative impact is imminent.
- Identify the boundaries of the area where problems are occurring.
- Consult with those specified by section 5(3) of the Licensing Act and subject to the outcome of that consultation, include and publish details of any special policy in the licensing policy statement.

Overview

This Authority has recognised that there are alcohol related harms associated with the density of licensed premises in the areas identified in this assessment and its appendices. However, the intention is not to simply stop the development of licensed premises in these areas. The Cumulative Impact and Stress Areas are intended to complement an overall approach which will be area specific and intended to promote those types of licensed premises which are considered by the Council as consistent with supporting the wider strategies, plans and policies in place to improve Medway.

The overall aim is to encourage a diversity of licensed premises which complement, enhance and support the communities in which they are situated and support the overall strategic goals of Medway Council.

Medway's Cumulative Impact Areas

Having regard to the legislation and guidance, Medway Council, as the Authority, has consulted on the issue of cumulative impact and, considering the evidence presented to it and the views of the respondents to the consultation, is publishing this Cumulative Impact Assessment to cover several areas in Medway, that we will call Cumulative Impact Areas.

The Council have identified four areas of Medway to be designated as Cumulative Impact Areas:

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

Maps of the designated areas can be found within the appendices to this document.

All the evidence considered by the Licensing and Safety Committee on 19 March 2024 can be found at [**LINK TO REPORT**](#) These areas have been identified as areas of concern because of the cumulative effect of the concentration of licensed premises and their customers, which has led to serious problems of crime, disorder and public nuisance affecting residents, visitors, and other businesses. In addition, public services, including police, health and emergency authorities and environmental services (cleansing and refuse services) are also being placed under strain.

The evidence presented to the Authority is distinct for each cumulative impact area and therefore each area is addressed on an individual basis in the attached appendices.

This assessment represents the Authority's view of the best way of addressing the licensing objectives in those areas of Medway which are subject of a cumulative impact.

Expectations of the Authority

The publication of a Cumulative Impact Assessment does not change the way that licensing decisions are made. Applications for new licences or variations to existing licences must still be considered on an individual basis.

An application for a premises or club which falls within a cumulative impact area will be expected to explain how the four licensing objectives will be promoted, so the premises will not adversely affect the evidenced alcohol related problems and issues in the area.

While it is a matter for the applicant what details are included in the operating schedule, where it departs from the relevant cumulative impact assessment outcome the authority will expect there to be a good reason for the departure if it is being asked to make an exception.

What the Authority will do

The presence of cumulative impact does not relieve responsible authorities or any other person of the need to make a relevant representation. Where no relevant representations are received, there is a presumption that any application will be granted in terms that are consistent with the submitted operating schedule.

Where the Authority's discretion has been engaged it will always consider every application on its merits, whether it has complied with the relevant requirements or not and will only amend or add to an operating schedule to the extent that is appropriate to promote the licensing objectives.

If an application is submitted for a premises or club within a cumulative impact area, and there are relevant representations, there is a presumption of refusal by the Authority, unless the applicant can demonstrate the premises will not adversely affect the licensing objectives.

Applications for new licences to replace licences which have lapsed because of the failure to submit an interim authority notice in due time in the event of the death or insolvency of a licence holder will be considered by the licensing authority as possible exceptions. Unless there are representations which indicate there have been problems associated with the premises, licences may be granted with conditions which replicate the effect of those of the previous licence.

Medway's Stress Areas

The cumulative impact areas define the centre, as far as is possible, of identified alcohol related harms. These harms, as well as the related licensed premises, extend beyond the boundaries of these areas. As with any policy that outlines a specific area, its effectiveness may be undermined if alcohol is readily available from nearby licensed premises. In addition, displacement from the cumulative impact areas could also have a detrimental effect on nearby areas where there is already concern.

In view of the above, the Authority has decided to designate certain areas as 'stress areas', where there is concern about alcohol related crime associated with a density of licenced premises, although not to a level where a cumulative impact area can be justified and where there are concerns regarding displacement of alcohol related harm into, and from, a cumulative impact area.

The Council have identified three areas of Medway to be designated as stress areas:

- Strood Town Centre.
- Chatham High Street and New Road.
- Gillingham South.

Maps of the designated areas can be found in the appendices to this document.

Expectations of the Authority

The existence of a stress area does not change the way that licensing decisions are made. Applications for new licences or variations to existing licences must still be considered on an individual basis.

An application for a premises or club which falls within a stress area will be expected to explain how the four licensing objectives will be promoted, so the premises will not adversely affect the evidenced alcohol related problems and issues in the area.

While it is a matter for the applicant what details are included in the operating schedule, where it departs from the relevant recommended measures, as detailed in the relevant Appendices, the authority will expect there to be a good reason for the departure if it is being asked to make an exception.

What the Authority will do

The presence of a stress area does not relieve responsible authorities or any other person of the need to make a relevant representation. Where no relevant representations are received, there is a presumption that any application will be granted in terms that are consistent with the submitted operating schedule.

Where the Authority's discretion has been engaged it will always consider every application on its merits and whether it has complied with the recommended measures or not. If not, applicants should be prepared to explain why any recommended measures have not been included in an operating schedule.

The Authority will only amend or add to an operating schedule to the extent that is appropriate to promote the licensing objectives.

Applications for new licences to replace licences which have lapsed because of the failure to submit an interim authority notice in due time in the event of the death or insolvency of a licence holder will be considered by the licensing authority as possible exceptions. Unless there are representations which indicate there have been problems associated with the premises, licences may be granted with conditions which replicate the effect of those of the previous licence.

Appendix A

Cumulative Impact Area - Chatham High Street

This Cumulative Impact Area will cover the area shown in the below in a map. There is also a list of roads at the end of the appendix.



The Chatham High Street Cumulative Impact Area will apply to the following applications for the sale of alcohol for consumption off the premises.

- a. New premises licence applications
- b. Material variations for existing premises licences
- c. Provisional statements for premises licences

If an application, that meets the above criteria, is submitted within this Cumulative Impact Area, and there are relevant representations, there is a presumption of refusal by the Authority, unless the applicant can demonstrate the premises will not adversely affect the licensing objectives.

Evidence summary

Evidence, provided to the Authority, shows this area has unacceptably high rates of:

- a. Criminal offences, the highest density occurring in the High Street, Pentagon Shopping Centre, Best Street, New Road, The Brook and surrounding areas.
- b. Anti-social behaviour, the highest density occurring in the High Street, Pentagon Shopping Centre, Best Street, New Road, The Brook.
- c. Domestic Abuse.
- d. Begging, with the highest density in the Medway area occurring in the Chatham High Street, Pentagon Shopping Centre, Best Street, New Road, The Brook and surrounding areas.
- e. Deprivation.
- f. Alcohol related hospital admissions.
- g. Alcohol related littering, street drinking, urination and defecation and co-located drug use in areas of public drinking.

The majority of respondents to community questionnaires, carried out in 2022 and 2023, and a focus group, consisting of 4 members of public who reside in the Luton Road/Chatham High Street area, felt licensed premises in this area contribute towards alcohol related issues. Most believed that off licences contributed most to alcohol related issues, followed by pubs and bars. A majority believed that the number of licensed premises contributed to the alcohol related issues in Chatham.

Chatham High Street overview

Chatham's High Street and the surrounding area has a mix of cafés, restaurants, pubs and a few late-night venues, as well as many fast-food type outlets. The traditional, small community pub has seen a decline, mainly leaving larger town centre premises, which benefit from a licence allowing later operation hours. Kent Police and Chatham residents have evidenced alcohol related crime, disorder and nuisance associated with both daytime alcohol misuse and the night-time economy.

The Chatham Public Space Protection Order implemented by Medway Council to try and prevent anti-social behaviour covers almost all of the Chatham Cumulative Impact Area.

There are off licensed premises in the Cumulative Impact Area, and surrounding area, most of which are small convenience stores, corner shops and newsagents. Many of these sell products which are known as 'super strength' beer and cider i.e. cheap beer and cider products over 5.5% ABV, making cheap, high-strength alcohol readily available. Evidence has been provided showing the number of off licensed premises has led, in part, to issues of street drinking and associated crime, disorder and nuisance as well as other, more hidden alcohol related harms, such as domestic abuse and health harms. Where its discretion is engaged the Authority regards the prevention of public nuisance and crime and disorder to residents as material considerations in any application.

Chatham is the location of extensive heritage assets, such as the Historic Dockyard and Fort Amherst. The Authority want to support and encourage businesses which complement and support these assets, encouraging tourists and increasing dwell time, growing local spend and improving the economic health of Chatham town centre.

Notwithstanding the existence of the Cumulative Impact Area, members are supportive of applications which will positively benefit the town centre in line with the aspirations outlined above. The kind of application which would be encouraged is for family friendly venues, such

as restaurants, community venues and other leisure businesses where the sale of alcohol is ancillary to the main activity.

The key aim in Chatham town centre is to encourage and expand the leisure, tourism and business visitor offer, with the intention of providing premises attractive to all age groups, and a diversity of licensed premises in both the day and night-time economy including:

- a. Restaurants and cafés, with an emphasis on good quality family friendly venues.
- b. Premises where the sale of alcohol is ancillary to the main business, such as:
 - a. Exhibition and art venues.
 - b. Theatres and cinemas.
 - c. Hotels.
- c. Venues which complement and enhance Medway's heritage.

This is a less restrictive approach than is suggested in the Statutory Guidance, which suggests that Licensing Authorities can adopt a policy of refusing all new licences where special areas on cumulative impact apply, subject to their discretion being engaged.

List of roads included in this Cumulative Impact Area

Addresses on both sides of all roads shown in the above map are included in the Cumulative Impact Area unless otherwise stated.

While every effort has been made to include all roads within the above area, there may be omissions, errors or additions due to ongoing development, and the following list is only intended as a guide. It is the applicant's responsibility to confirm the location of their premises.

A2 New Road from its junction with Chatham Hill to its junction with Manor Road
A230 Maidstone Road to the Bus Station junction
A231 The Brook
A231 Dock Road to its junction with Globe Lane (bus station)
Batchelor Street
Best Street
Clover Street
Cross Street
Gibraltar Hill
Globe Lane
High Street between the junction with Chatham Hill and the second junction with Gundulph Road (travelling from Chatham town centre)
James Street
Manor Road
Medway Street
Meeting House Lane
Military Lane
New Street
Ordnance St from its junction with New St to Ordnance Terrace
Ordnance Terrace from its junction with Ordnance Street to Railway Street
Railway Street
Rhode Street
Richard Street
Rochester Road to its junction with New Street
Rome Terrace
Slicketts Hill

Solomons Road
The Paddock
Union Street
Upbury Way
Waterfront Way
Whittaker Street

Appendix B

Cumulative Impact Area - Gillingham High Street

This Cumulative Impact Area will cover the area shown in the below map. There is also a list of roads at the end of the appendix.



The Gillingham High Street Cumulative Impact Area will apply to the following applications for the sale of alcohol for consumption off the premises.

- a. New premises licence applications
- b. Material variations for existing premises licences
- c. Provisional statements for premises licences

If an application, that meets the above criteria, is submitted within this Cumulative Impact Area, and there are relevant representations, there is a presumption of refusal by the Authority, unless the applicant can demonstrate the premises will not adversely affect the licensing objectives.

Evidence summary

Evidence, provided to the Authority, shows this area has unacceptably high rates of:

- a. Criminal offences, the highest density occurring around the High Street and Gillingham train station.
- b. Anti-social behaviour, the highest density occurring around the High Street and Gillingham train station.
- c. Domestic Abuse.
- d. Begging.
- e. Deprivation.
- f. Alcohol related hospital admissions.
- g. Alcohol related littering, street drinking, urination and defecation, and co-located drug litter.

The majority of respondents to community questionnaires, carried out in 2022 and 2023, felt that licensed premises were contributing to the alcohol related issues. Most believed that off licences contributed most to alcohol related issues, followed by pubs and bars. A majority believe that the number of licensed premises contributed to the alcohol related issues in Gillingham.

Gillingham High Street overview

Gillingham is the second largest town centre in Medway after Chatham. It has good sports and leisure facilities, with Gillingham Football Club to the east and a large leisure and sports facility to the west. There is also access to large areas of green space, particularly the Great Lines Heritage Park.

The Gillingham Public Space Protection Order implemented by Medway Council to try and prevent anti-social behaviour covers almost all of the Chatham Cumulative Impact Area.

Residents live in many of the roads and streets within the Cumulative Impact area, which also link the High Street to the nearby residential areas, both north and south of the High Street. The area surrounding the High Street is one of the most densely populated residential areas in Medway.

The Universities on the Medway complex are within walking distance of the High Street and there is a large student population, some of whom live in student accommodation in and around the High Street, within the Cumulative Impact area.

While there are cafés and restaurants, these tend towards being value for money and fast-food type outlets. There are pubs and a few late-night venues in the area, but the traditional small community pub has seen a real decline.

There are off licensed premises in the Cumulative Impact Area and surrounding area, most of which are small convenience stores, corner shops and newsagents. Many of these sell products which are termed as 'super strength' beer and cider i.e. cheap beer and cider products over 5.5% ABV, making cheap, high-strength alcohol readily available. Evidence has been provided showing the number of off licensed premises has led, in part, to issues of street drinking and associated crime, disorder and nuisance as well as other, more hidden alcohol related harms, such as domestic abuse and health harms.

Kent Police and Gillingham residents have evidenced alcohol related crime, disorder and nuisance associated with both daytime alcohol misuse and the night-time economy. Where

its discretion is engaged the Authority regards the prevention of public nuisance and crime and disorder affecting residents as a material consideration in any application.

The Authority wants to support and encourage businesses which support the local economy, without adding to the issues outlined in the evidence provided in the assessment, encouraging visitors and increasing dwell time, growing local spend and improving the economic health of Gillingham town centre.

Notwithstanding the existence of the Cumulative Impact Area, the Authority is supportive of applications which will positively benefit the town centre in line with the aspirations outlined above.

The key aim in Gillingham town centre is to encourage and expand the leisure offer, with the intention of providing venues which are attractive to all age groups providing a diversity of licensed premises in both the day and evening economy including:

- a. Restaurants and cafés, with an emphasis on good quality, family friendly venues.
- b. Community and arts venues.
- c. Venues which complement and enhance Medway's heritage.
- d. Premises where the sale of alcohol is ancillary to the main business.

This is a less restrictive approach than is suggested in the Statutory Guidance, which suggests that Licensing Authorities can adopt a policy of refusing all new licences where special areas on cumulative impact apply, subject to their discretion being engaged.

List of roads included in this Cumulative Impact Area

Addresses on both sides of all roads shown in the above map are included in the Cumulative Impact Area unless otherwise stated.

While every effort has been made to include all roads within the above area, there may be omissions, errors or additions due to ongoing development, and the following list is only intended as a guide. It is the applicant's responsibility to confirm the location of their premises.

A231 from Jeffrey Street to Duncan Road
Balmoral Road from Duncan Road to Trafalgar Street
Britton Street
Canterbury Street from Skinner Street to junction with Gillingham Road
Connaught Road
Cross Street between James Street and Gainer Street
Dawes Street
Duncan Road
Edinburgh Road
Gardiner Street to the junction with Saunders Street
Gillingham Road from Ingram Road to Nelson Road
Green Street
High Street
Ingram Road from Cavendish Ave to Gillingham Road
James Street
Jeffery Street between the High Street and the A231
King Street
Lawrence Street

Lock Street
Marlborough Road from High Street to Paget Street
Osborne Road
Paget Street
Randolph Road
Saunders Street
Saxton Street from High Street to Paget Street
Skinner Street from Jeffery Street to Canterbury Street
Theodore Place
Trafalgar Street
Victoria Street

Appendix C

Cumulative Impact Area – Luton Road and Chatham Central

This Cumulative Impact Area will cover the area shown in the below map. There is also a list of roads at the end of this appendix.



The Luton Road and Chatham Central Cumulative Impact Area will apply to the following applications for the sale of alcohol for consumption off the premises.

- a. New premises licence applications
- b. Material variations for existing premises licences
- c. Provisional statements for premises licences

If an application, that meets the above criteria, is submitted within this Cumulative Impact Area, and there are relevant representations, there is a presumption of refusal by the Authority, unless the applicant can demonstrate the premises will not adversely affect the licensing objectives.

Evidence summary

Evidence, provided to the Authority, shows this area has unacceptably high rates of:

- a. Criminal offences, Luton Road being the second highest density of repeat venues in the borough.
- b. Anti-social behaviour.
- c. Domestic Abuse.
- d. Deprivation.
- e. Alcohol related hospital admissions, Chatham Central and Brompton Ward is ranked 1 and Luton Ward is ranked at 3 in Medway.
- f. Alcohol related littering, public urination and defecation, street drinking and co-located drug litter.

A majority of respondents to a community questionnaire felt licensed premises in this area contribute towards alcohol related issues, and that customers from licensed premises contribute to problems of public nuisance and issues with children. Off licensed premises were identified by all respondents as contributing to alcohol related problems.

Luton Road and Chatham Central overview

This is a densely populated area of Medway with many houses of multiple occupation, poor quality housing stock and many social and health issues.

The Chatham Public Space Protection Order implemented by Medway Council to try and prevent anti-social behaviour covers a small part of the Luton Road and Chatham Central Cumulative Impact Area.

There are off licensed premises in the Cumulative Impact area, and surrounding area, most of which are small convenience stores, corner shops and newsagents. The general availability of alcohol, including the products known as 'super strength' beer and cider i.e. cheap beer and cider products over 5.5% ABV, is a real concern. The number of premises makes cheap alcohol, particularly high-strength products, readily available.

Chatham and Luton residents have evidenced alcohol related crime, disorder and nuisance associated with daytime alcohol misuse. Evidence shows that the number of off licensed premises has led, in part, to issues of street drinking and associated crime, disorder and nuisance as well as other, more hidden alcohol related harms, such as domestic abuse and health harms. Where its discretion is engaged the Authority regards the prevention of public nuisance and crime and disorder affecting residents as a material consideration in any application.

Notwithstanding the existence of the Cumulative Impact Area, the Authority is supportive of applications which will positively benefit this area. The key aim in Luton and Chatham Central is to encourage and expand the local retail and community offer, with the intention of providing venues which are attractive to all age groups and a diversity of licensed premises primarily for use in the daytime economy:

- a. Cafés, with an emphasis on good quality, family friendly venues.
- b. Community and arts venues.
- c. Venues which complement and enhance Medway's heritage.
- d. Premises where the sale of alcohol is ancillary to the main business.

List of roads included in this Cumulative Impact Area

Addresses on both sides of all roads shown in the above map are included in the Cumulative Impact Area unless otherwise stated.

While every effort has been made to include all roads within the above area, there may be omissions, errors or additions due to ongoing development, and the following list is only intended as a guide. It is the applicant's responsibility to confirm the location of their premises.

Albany Road
Albert Road
Alfred Close
Bank Street
Beaconsfield Road from footpath to Holcombe Road to Curzon Road
Bryant Street
Castle Road
Chalk Pit Hill
Charter Street between Warner Street and Southill Road
Christopher Close
Claremont Way
Clarence Road
Cromwell Terrace
Curzon Road
Diana Road
East Street
Edward Street
Ernest Road
Glencoe Road
Gordon Road
Hannah Close
Hare Street
Hartington Street
Henry Street
Herbert Road
Herman Terrace
Holcombe Road between Jenkin's Dale to Southill Road
Hope Street
Jenkin's Dale
Leopold Road
Lester Road
Listmas Road
Luton High Street
Luton Road
Magpie Hall Road between the A2 and Shipwrights Avenue
Maida Road
Mark Street
Mary Court
Mills Terrace
Mount Road
Natal Road
Newnham Street
Oliver Close
Otway Street
Otway Terrace

Palmerston Road from Albert Road to Glencoe Road
Portland Street
Prospect Row
Russell Court
Ruth Street
Salisbury Road
Sawyers Close
Shipwrights Avenue
Short Street
Silver Hill
Skinner Street
Southill Road
Stevens Close
Sturla Road
Sydney Road
Victoria Road
Waghorn Street
Warner Street

Appendix D

Cumulative Impact Area - Rochester High Street

This Cumulative Impact Area will cover the area shown in the below map. There is also a list of roads at the end of the appendix.



The Rochester High Street Cumulative Impact Area will apply to the following applications for the sale of alcohol for consumption on the premises, off the premises and on and off the premises.

- a. New premises licence applications
- b. Material variations for existing premises licences
- c. Provisional statements for premises licences

Evidence summary

Evidence, provided to the Authority, shows this area has unacceptably high rates of:

- a. Criminal offences, the highest density occurring in the High Street and surrounding areas.
- b. Anti-social behaviour, the highest density occurring in the High Street, Corporation Street and surrounding areas.
- c. Domestic Abuse.
- d. Begging.
- e. Deprivation.
- f. Alcohol related hospital admissions.
- g. Alcohol related littering, street drinking, urination and defecation and street drinking.

The majority of respondents to community questionnaires, carried out in 2022 and 2023, and a focus group, consisting of six residents of the area, felt licensed premises in this area contribute towards alcohol related issues. They indicate that the issues within this area are experienced during the day, the evening and into the night, which in turn, indicates that nighttime economy premises, as well as off licences, contribute to the issues.

Rochester High Street area overview

Rochester is unique due to its historic setting. It is the location of extensive heritage assets, such as Rochester Cathedral, Rochester Castle and The Guildhall. The train station has direct links to London and down to the coast and there are extensive car parks available for short and long stays. Rochester has an established reputation for street festivals in the High Street area, such as the Sweeps Festival and the Dickens Festival, as well as open air concerts and events in the Castle grounds.

As a result, Rochester attracts many tourists, visitors and business travellers alongside catering for the local residents.

The High Street area is mixed-use, with hundreds of residential and commercial properties in the road, streets and alleyways which link the town centre to other nearby residential areas.

The offer in the High Street has evolved to support the historic attractions through the provision of commercial leisure, such as restaurants and cafés, reinforcing its attractiveness for day and evening activities. There are several pubs and late-night venues, and it is the primary late-night economy in Medway.

There are also several off licences, which are small convenience stores, corner shops and newsagents. Many of these sell products which are termed as 'super strength' beer and cider i.e. cheap beer and cider products over 5.5% ABV, making cheap, high-strength alcohol readily available.

The Rochester Public Space Protection Order implemented by Medway Council to try and prevent anti-social behaviour covers the majority of the Rochester Cumulative Impact Area.

There is potential to increase visitor numbers, local engagement and raise Medway's image as a tourist destination by enhancing and strengthening the above offer, by encouraging a range of diverse venues. The Authority wants to support and encourage businesses which complement and support these assets, increasing dwell time, growing local spend and improving the economic health of the town centre.

Notwithstanding the existence of the Cumulative Impact Area, members are supportive of applications which will positively benefit the High Street in line with the aspirations outlined above.

The key aim in Rochester High Street is to encourage and expand the leisure, tourism and business visitor offer, with the intention of providing premises attractive to all age groups and a diversity of licensed premises primarily centred on the day and early evening economy. The kinds of application which would be encouraged include:

- a. Restaurants and cafés, with an emphasis on good quality family friendly venues.
- b. Premises where the sale of alcohol is ancillary to the main business, such as:
 - i. Exhibition and art venues.
 - ii. Theatres and cinemas.
 - iii. Hotels.
- c. Venues which complement and enhance Medway's heritage.

This is a less restrictive approach than is suggested in the Statutory Guidance, which suggests that licensing authorities can adopt a policy of refusing all new licences where special areas of cumulative impact apply, subject to their discretion being engaged.

List of roads included in this Cumulative Impact Area

Addresses on both sides of all roads shown in the above map are included in the Cumulative Impact Area unless otherwise stated.

While every effort has been made to include all roads within the above area, there may be omissions, errors or additions due to ongoing development, and the following list is only intended as a guide. It is the applicant's responsibility to confirm the location of their premises.

Almon Place
Bishops Walk
Blue Boar Lane
Cazeneuve Street
Corporation Street
Crow Lane
Davey Court
East Row
Eastgate
Eastgate Terrace
Gravel Walk
High Street to the junction with Nags Head Lane
La Providence
Maidstone Road from East Row to King Street
Northgate
Star Hill from Corporation Street to King Street
The Terrace
Union Street
Victoria Street

Appendix E

Stress Area - Strood Town Centre

This Stress Area will cover the area shown in the below maps. There is also a list of roads at the end of the appendix.



The Strood Stress Area will apply to the following Road applications for the sale of alcohol for consumption off the premises.

- a. New premises licence applications
- b. Material variations for existing premises licences
- c. Provisional statements for premises licences

If an application that meets the above criteria is submitted within this Stress Area, the applicant is expected to have carried out a risk assessment for their business and considered the addition of recommended measures to prevent a negative effect on the licensing objectives. If they choose not to carry out the assessment or include the recommended measures, they should provide reasons why.

Evidence summary

Evidence, provided to the Authority, shows this area has concerning rates of:

- a. Criminal offences, particularly in the town centre and by the train station.
- b. Antisocial behaviour.
- c. Domestic Abuse.
- d. Alcohol related hospital admissions.
- e. Deprivation.
- f. Alcohol related littering.

Strood Town Centre overview

Pedestrians in Rochester can access Strood town centre within minutes, by walking across the Rochester Bridge, and vice versa. Alcohol can easily be purchased in one area and consumed in the other. The area of Rochester High Street is one of Medway's Cumulative Impact Areas. The close proximity of these areas makes the issues of dispersal and displacement from one area to the other a concern for the Authority.

The Strood Public Space Protection Order implemented by Medway Council to try and prevent anti-social behaviour covers the same area as this Stress Area.

Strood is primarily a convenience retail destination with a Retail Park, a selection of supermarkets and a traditional High Street serving the local community. Although it provides everyday basic needs, the general quality of the town centre environment is currently poor and there is currently little leisure provision in this area.

In Medway it has been identified that town centres are valued by communities for a range of retail services and community facilities, such as libraries. The Authority supports the social dimension of sustainable development by ensuring local services reflect the community's needs, and it wants to support a strategy in Strood town centre which sees a high-quality built environment supporting the local community by providing a strong and healthy town centre.

Notwithstanding the existence of the stress area, members are supportive of applications which will positively benefit Strood town centre in line with the aspirations outlined above.

Recommended Measures

Risk Assessment

The Authority recommends that applicants complete a risk assessment of their business to understand what steps are required to complete the operating schedule in a manner which enables the Council, responsible authorities and other persons to assess how they will seek to promote the licensing objectives in this area. Risk assessments will vary according to the nature of the business, and it is for applicants to decide what is appropriate in each case. The Authority believe that the completion of a risk assessment and implementation of appropriate steps will reduce the likelihood of representations.

The Authority recognises that it cannot insist on a risk assessment. However, an applicant who decides not to complete or provide a risk assessment may face representations and the expense of a hearing as a result. If a risk assessment is not completed, then applicants will need to demonstrate how these matters have been addressed through the operating schedule provided.

While it is a matter for each applicant, the Authority strongly recommends that all issues identified in this. and the surrounding area are addressed when completing their risk assessment.

Suggested conditions

The Authority, having accepted the evidence of alcohol related problems in this area, encourages applicants for the sale of alcohol off the premises to consider the following measures:

- a. Hours of operation for off licensed premises 09:00 to 23:00.
- b. Installation of CCTV to a standard acceptable to Kent Police.
- c. Challenge 25 policy.
- d. Documented refusals system.
- e. Documented staff training, and retraining, including underage sales, proxy sales and drunkenness.
- f. Minimum staffing levels.
- g. Restrictions on high-strength beers, lagers and ciders.
- h. A clear glazing policy to allow for a clear and unobstructed view to the front of the premises.
- i. No sale of single cans or bottles of beer, lager or cider.
- j. Defined display areas.
- k. Monitoring of litter in immediate area.

List of roads included in the Strood Stress Area.

Addresses on both sides of all roads shown in the above map are included in the Stress Area unless otherwise stated.

While every effort has been made to include all roads within the above area, there may be omissions, errors or additions due to ongoing development, and the following list is only intended as a guide. It is the applicant's responsibility to confirm the location of their premises.

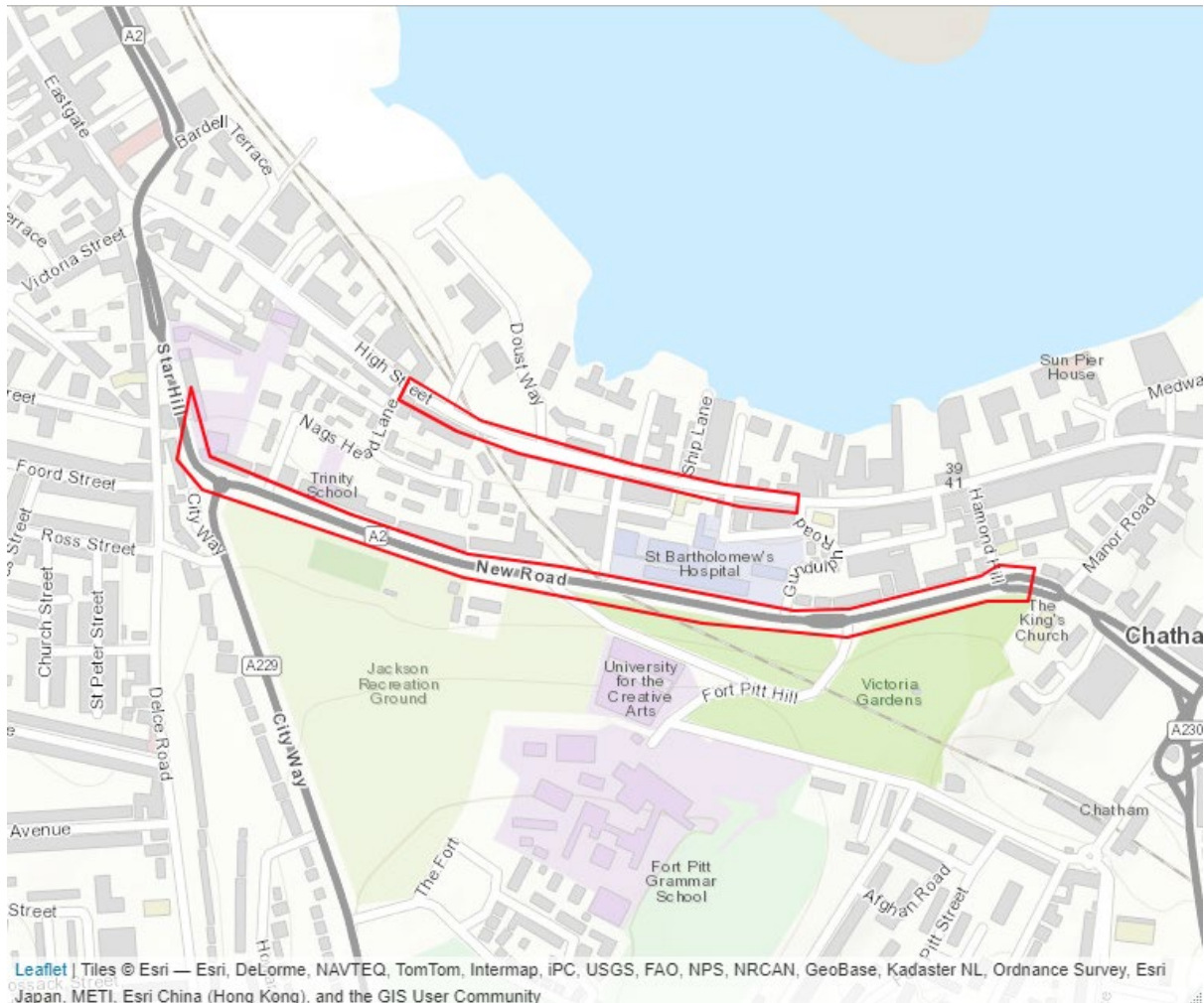
Albert Place
Alma Place
Bowes Road
Burgess Road
Canal Road
Charles Street
Commercial Road
Cuxton Road between Gun Lane and Priory Road
Doggett's Square
Edward Street
Esplanade
Frindsbury Road between Station Road and North Street
Friary Place
Grange Road
Grove Road
Gun Lane
High St between Rochester Bridge and Gun Lane/Cuxton Road
Knight Road
Marsh Street
Newark Yard
North Street

Priory Road
Roach Street
Smith Street
South Eastern Road
St Mary's Road
Station Road
Vicarage Road
Victoria Street

Appendix F

Stress Area - Chatham High Street and New Road

This Stress Area will cover the area shown in the below maps. There is also a list of roads at the end of the appendix.



The Chatham Stress Area will apply to the following applications for the sale of alcohol for consumption off the premises.

- a. New premises licence applications
- b. Material variations for existing premises licences
- c. Provisional statements for premises licences

If an application that meets the above criteria is submitted within this Stress Area, the applicant is expected to have carried out a risk assessment for their business and considered the addition of recommended measures to prevent a negative effect on the

licensing objectives. If they choose not to carry out the assessment or include the recommended measures, they should provide reasons why.

Evidence summary

Evidence, provided to the Authority, shows this area has concerning rates of:

- a. Criminal offences, particularly in the High Street.
- b. Anti-social behaviour, particularly in the High Street.
- c. Domestic Abuse.
- d. Begging.
- e. Deprivation.
- f. Alcohol related littering.

Chatham High Street and New Road overview

Pedestrians in Rochester can access Chatham Town Centre within 10-15 minutes, by walking along either of the streets designated in this Stress Area, and vice versa. Alcohol can easily be purchased in one area and consumed in the other or in the adjoining streets. Both Rochester High Street and the area in Chatham are covered by Cumulative Impact Areas. The close proximity of these areas makes the issues of dispersal and displacement from one area to the others a concern for the Authority.

The Chatham Public Space Protection Order implemented by Medway Council to try and prevent anti-social behaviour covers all of this Stress Area.

There are several cafés and restaurants along this section of the High Street, as well as micropubs and larger, more traditional, public houses. Along the A2, New Road there is a night club and a hotel.

This is a mixed-use area, with residential properties, educational institutions, business and retail outlets. Where its discretion is engaged the Authority regards the prevention of public nuisance, protection of children from harm and prevention of crime and disorder as material considerations in any application.

Communities value a range of retail and leisure services and community facilities. The Authority wants to ensure local services reflect the community's needs, and to support a strategy which sees a strong, vibrant and healthy community.

Notwithstanding the existence of the stress area, members are supportive of applications which will positively benefit the area between Rochester and Chatham in line with the aspirations outlined above.

Recommended measures

Risk Assessment

The Authority recommends that applicants complete a risk assessment of their business to understand what steps are required to complete the operating schedule in a manner which enables the Council, responsible authorities and other persons to assess how they will seek to promote the licensing objectives in this area. Risk assessments will vary according to the nature of the business, and it is for applicants to decide what is appropriate in each case. The Authority believe that the completion of a risk assessment and implementation of appropriate steps will reduce the likelihood of representations.

The Authority recognises that it cannot insist on a risk assessment. However, an applicant who decides not to complete or provide a risk assessment may face representations and the

expense of a hearing as a result. If a risk assessment is not completed, then applicants will need to demonstrate how these matters have been addressed through the operating schedule provided.

While it is a matter for each applicant, the Authority strongly recommends that all issues identified in this, and the surrounding area are addressed when completing their risk assessment.

Suggested conditions

The Authority, having accepted the evidence of alcohol related problems in this area, encourages applicants for the sale of alcohol off the premises to consider the following measures:

- a. Hours of operation for off licensed premises 09:00 to 23:00.
- b. Installation of CCTV to a standard acceptable to Kent Police.
- c. Challenge 25 policy.
- d. Documented refusals system.
- e. Documented staff training, and retraining, including underage sales, proxy sales and drunkenness.
- f. Minimum staffing levels.
- g. Restrictions on high-strength beers, lagers and ciders.
- h. A clear glazing policy to allow for a clear and unobstructed view to the front of the premises.
- i. No sale of single cans or bottles of beer, lager or cider.
- j. Defined display areas.
- k. Monitoring of litter in immediate area.

List of roads included in the Chatham High Street and New Road Stress area.

Addresses on both sides of all roads shown in the above map are included in the Stress Area unless otherwise stated.

While every effort has been made to include all roads within the above Stress Area, there may be omissions, errors or additions due to ongoing development, and the following list is only intended as a guide. It is the applicant's responsibility to confirm the location of their premises.

High Street between Gundulph Road and Nags Head Lane
A2, New Road between Manor Road and Star Hill

Appendix G

Stress Area - Gillingham South

This Stress Area will cover the area shown in the below maps. There is also a list of roads at the end of the appendix.



The Gillingham South Stress Area will apply to the following applications for the sale of alcohol for consumption off the premises.

- a. New premises licence applications
- b. Material variations for existing premises licences
- c. Provisional statements for premises licences

If an application that meets the above criteria is submitted within this Stress Area, the applicant is expected to have carried out a risk assessment for their business and considered the addition of recommended measures to prevent a negative effect on the licensing objectives. If they choose not to carry out the assessment or include the recommended measures, they should provide reasons why.

Evidence summary

Evidence, provided to the Authority, shows this area has concerning rates of:

- a. Criminal offences, particularly in the town centre and by the train station.
- b. Antisocial behaviour.
- c. Domestic Abuse.
- d. Alcohol related hospital admissions.
- e. Deprivation.
- f. Alcohol related littering.

Gillingham South overview

This area is directly below the Cumulative Impact Area for Gillingham and therefore pedestrians have no distance to walk to get into it and vice versa. Alcohol can easily be purchased in one area and consumed in the other. The close proximity of these areas makes the issue of dispersal and displacement from one area to the other a concern for the Authority.

This is predominately a residential area with a few off licences and the boundary running around the perimeter of the hospital. Where its discretion is engaged the Authority regards the prevention of public nuisance, crime and disorder to residents as a material consideration in any application.

Communities value a range of retail and community facilities. The Authority wants to ensure local services reflect the community's needs, and to support a strategy which sees a strong and healthy retail offer.

Notwithstanding the existence of the stress area, members are supportive of applications which will positively benefit the area in Gillingham South.

Recommended measures

Risk Assessment

The Authority recommends that applicants complete a risk assessment of their business to understand what steps are required to complete the operating schedule in a manner which enables the Council, responsible authorities and other persons to assess how they will seek to promote the licensing objectives in this area. Risk assessments will vary according to the nature of the business, and it is for applicants to decide what is appropriate in each case. The Authority believe that the completion of a risk assessment and implementation of appropriate steps will reduce the likelihood of representations.

The Authority recognises that it cannot insist on a risk assessment. However, an applicant who decides not to complete or provide a risk assessment may face representations and the expense of a hearing as a result. If a risk assessment is not completed, then applicants will need to demonstrate how these matters have been addressed through the operating schedule provided.

While it is a matter for each applicant, the Authority strongly recommends that all issues identified in this, and the surrounding area are addressed when completing their risk assessment.

Suggested conditions

The Authority, having accepted the evidence of alcohol related problems in this area, encourages applicants for the sale of alcohol off the premises to consider the following measures:

- a. Hours of operation for off licensed premises 09:00 to 23:00.
- b. Installation of CCTV to a standard acceptable to Kent Police.

- c. Challenge 25 policy.
- d. Documented refusals system.
- e. Documented staff training, and retraining, including underage sales, proxy sales and drunkenness.
- f. Minimum staffing levels.
- g. Restrictions on high-strength beers, lagers and ciders.
- h. A clear glazing policy to allow for a clear and unobstructed view to the front of the premises.
- i. No sale of single cans or bottles of beer, lager or cider.
- j. Defined display areas.
- k. Monitoring of litter in immediate area.

List of roads included in the Gillingham South Stress area.

Addresses on both sides of all roads shown in the above map are included in the Stress Area unless otherwise stated.

While every effort has been made to include all roads within the above Stress Area, there may be omissions, errors or additions due to ongoing development, and the following list is only intended as a guide. It is the applicant's responsibility to confirm the location of their premises.

Adelaide Road
 Albert Road
 Belmont Road
 Britton Street south of Paget Street
 Byron Road
 Canterbury Street from Nelson Road to Rock Avenue
 College Avenue
 Copenhagen Road
 Frederick Road
 Gillingham Road from Nelson Road to Canterbury Street
 Jeyes Road
 Longfellow Road
 Marlborough Road from York Avenue to Paget Street
 May Road
 Milton Road from Rock Avenue to Byron Road
 Montgomery Road
 Nelson Road from Gillingham Road to St John's Road
 Nile Road
 Pretoria Road
 Queen's Road
 Regent Road
 Rock Avenue from Canterbury Street to Byron Road
 Saxton Street from Stafford Street to Paget Street
 Seaview Road
 Shakespeare Road from Rock Avenue to Byron Road
 Stopford Road
 Vicarage Road
 Waterloo Road
 Wellington Road
 Windmill Road from Canterbury Street to Byron Road
 York Avenue