

Objection to Premises License Application

To:

Licensing Authority, Medway Council

From:

Steven Hutchins

Date:

5 July 2025

1. Introduction & Licensing Objectives

I lodge a **relevant representation** opposing the proposed premises licence at
Budgens, 1 Block C
Pioneer Wharf
Chatham Waterfront
ME4 4HA,

This property is just **under 50 m** from **Chatham Waterfront Bus Station**—heavily used by schoolchildren. This objection invokes the following **Licensing Act 2003 objectives**:

- Prevention of crime & disorder
- Public safety
- Prevention of public nuisance
- Protection of children from harm

This objection draws on Medway's **Cumulative Impact Policy**, Section 182 Guidance, Home Office statistics on alcohol-related violence, and local crime data.

2. Cumulative Impact Area & Sensitive Location

The premises sits within the **Chatham Cumulative Impact Area**, which enforces a **presumption of refusal** for off-licence applications unless clearly demonstrated to not add to harm.

Its proximity—**less than 50 m**—to the **Chatham Waterfront Bus Station**, a hub of morning and afternoon school bus travel, places children at **heightened risk** of exposure to anti-social behaviour, harassment, and nuisance from alcohol-related activity.

3. Crime & Disorder Evidence

3.1 Local Crime

The Brook precinct area recorded in April 2025:

- **98 violent/sexual offences**
- **59 anti-social behaviour incidents**
- **28 shopliftings**

Notable historical crime includes a stabbing in Sept 2016, teenage drug dealing, and drug-related hygiene issues in the precinct ([gov.uk](https://www.gov.uk), en.wikipedia.org).

3.2 Alcohol-Related Violence

- **42%** of violent incidents nationally involve alcohol ([gov.uk](https://www.gov.uk)).
- **65–91%** of violence around licensed premises/outdoors is alcohol-related.
- In Kent, **25–39%** of violent crimes are alcohol-related—roughly **16,550–25,400** annually ([kpho.org.uk](https://www.kpho.org.uk)).

Kent Police notes that **street drinking** can lead to **verbal abuse, intimidation, public urination, and disorder** ([kent.police.uk](https://www.kent.police.uk)).

3.3 Cumulative Impact Risk

Medway’s Cumulative Impact Assessment confirms that additional off-licence premises in this area will **exacerbate crime, disorder, harassment, alcohol-fuelled nuisance, and child exposure risk**.

4. Public Nuisance – Noise, Harassment, Litter

Medway’s policy flags that **noise from arrival/departure, loitering by intoxicated groups, harassment, and littering** near school transit points are all public nuisance risks.

The premises’ closeness to a **child-frequented bus station** risks increased **noise, harassment, and street fouling**, with discarded bottles and packaging impacting children, staff, and families.

5. Inadequacy of Applicant’s Operating Schedule

The applicant offers generic controls—Challenge 25, CCTV, intoxication refusal, capacity, cleanliness—but fails to address:

- Risk to **children** at the bus station
- **Area-specific risks** of noise, harassment, and street drinking
- **Cumulative harm** in a licensed and sensitive setting

These omissions fall short of Medway’s policy, which requires bespoke evidence-based mitigation for premises in CIP zones near sensitive receptors.

6. Legal & Policy Framework

- **Section 182 Guidance** states CIP areas carry a **presumption of refusal** that applicants must rebut.
- **Medway's Licensing Policy** requires addressing **crime, nuisance, safety, and protection of children** within the operating schedule. Failure to tailor these in context is grounds for refusal.

7. Request to Licensing Authority

Given:

- Location in a **Cumulative Impact Area**
- Proximity to a **children's bus station (under 50 m)**
- Substantial local crime and disorder
- Significant alcohol-related violence trends
- Inadequate mitigation for crime, nuisance, and children's harm

Conclusion

Approving this licence would breach the Licensing Act 2003 objectives—especially crime prevention, public safety, nuisance prevention, and children protection—contravening Section 182 Guidance and Medway's CIP. The evidence of local alcohol-related violence, existing disorder, and the site's proximity to a children's transport hub make refusal the only compliant decision.

I therefore urge Medway Council to refuse this premises licence application.
