



Director of Public Health
Public Health Directorate
Medway Council,
Gun Wharf,
Dock Road,
Chatham, Kent. ME4 4TR
4 August 2025

LICENSING ACT 2003

A VARIATION OF A PREMISES LICENCE APPLICATION

1 NEWLANDS NEWSAGENTS, 111, HIGH ST, ROCHESTER. ME1 1JS

The Director of Public Health is making representations concerning an application for the grant of the above premises licence. The representations are made against the following licensing objectives:

- The prevention of crime and disorder
- The prevention of public nuisance

1.1 GENERAL COMMENTS

This premises is in the High St, which is the main shopping and pedestrian area in Rochester. It is a busy shopping and tourist area consisting of a mix of businesses and shops, including those selling alcohol, and tourist attractions including museums and the Castle. Rochester High St also has a high concentration of residential housing.

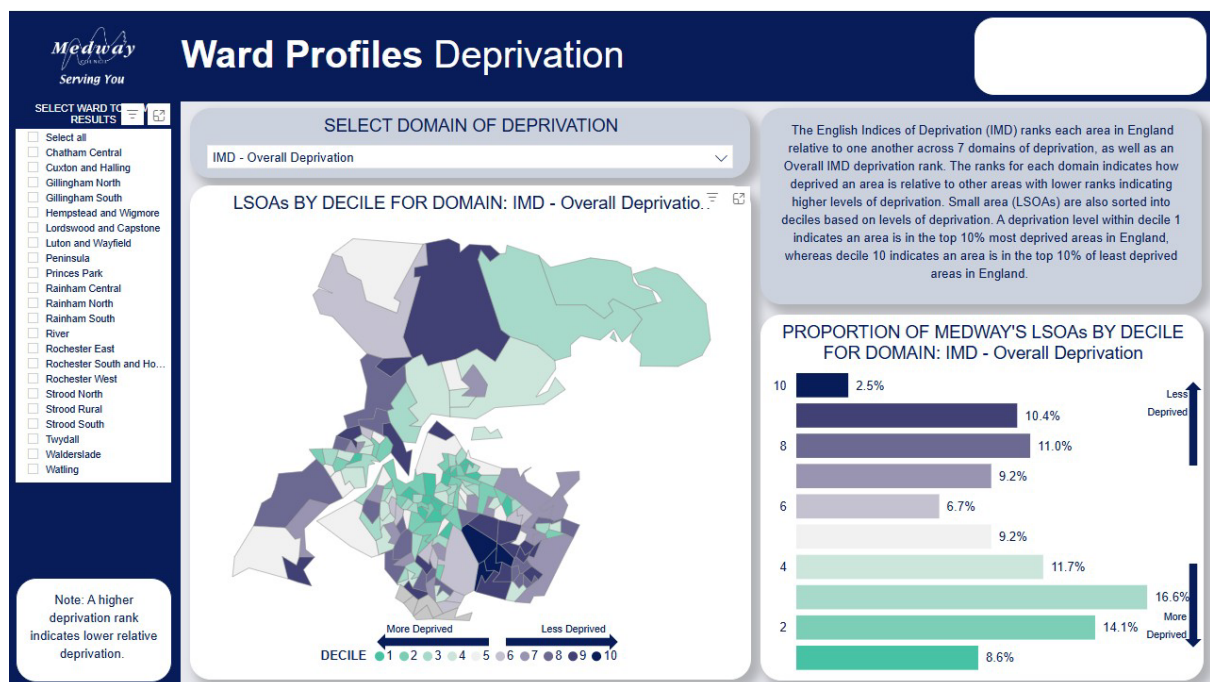
This premises is located within the Rochester High St cumulative impact assessment (CIA) area which mainly covers the High St and surrounding area. There is strong evidence of high levels of alcohol related crime, disorder and public nuisance associated with a density of both on and off-licenses, in the Rochester CIA area.

Rochester is different from the other CIP areas in Medway. Many people are resident in the High St and are affected by alcohol related issues from customers of both the off licences and the pubs, bars and nightclubs.

2 THE PREVENTION OF CRIME AND DISORDER

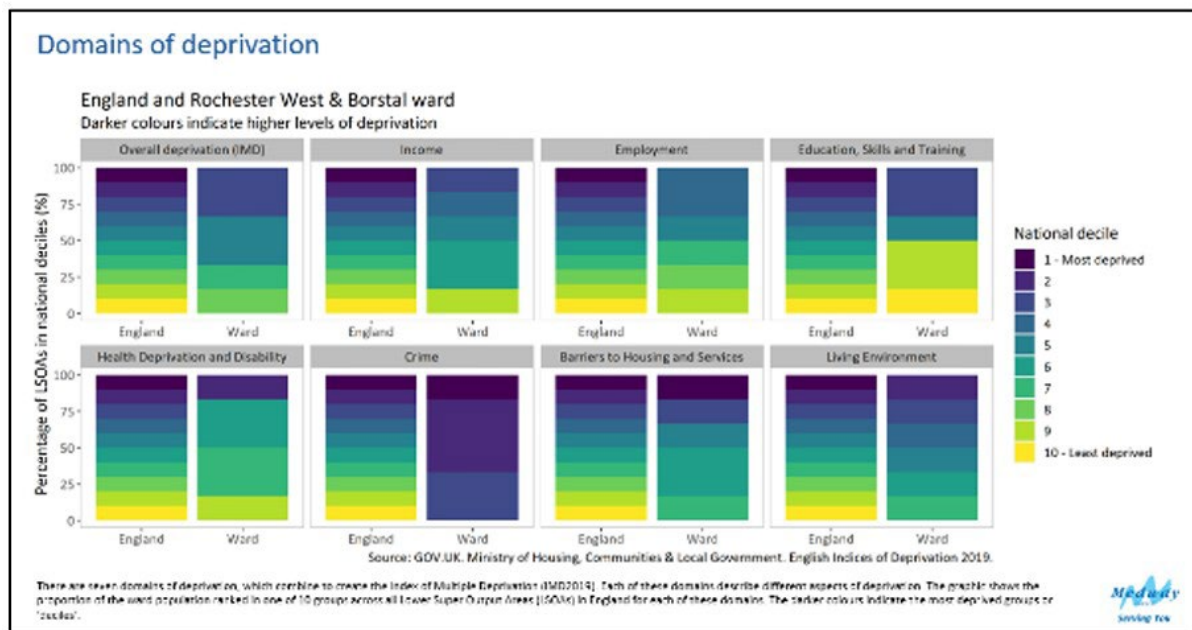
To support the CIA the police provided evidence of alcohol related crime in and around the Rochester High Street area, such as assaults, domestic abuse, anti-social behaviour, criminal damage and public order.

The Rochester CIP area borders some of the most deprived areas in Medway, as shown in the below graphic taken from the Medway Council website. Alcohol-related crime (e.g., violence, domestic abuse, anti-social behaviour) is more prevalent in deprived areas and high alcohol outlet density in these areas has been linked to increased crime and disorder.

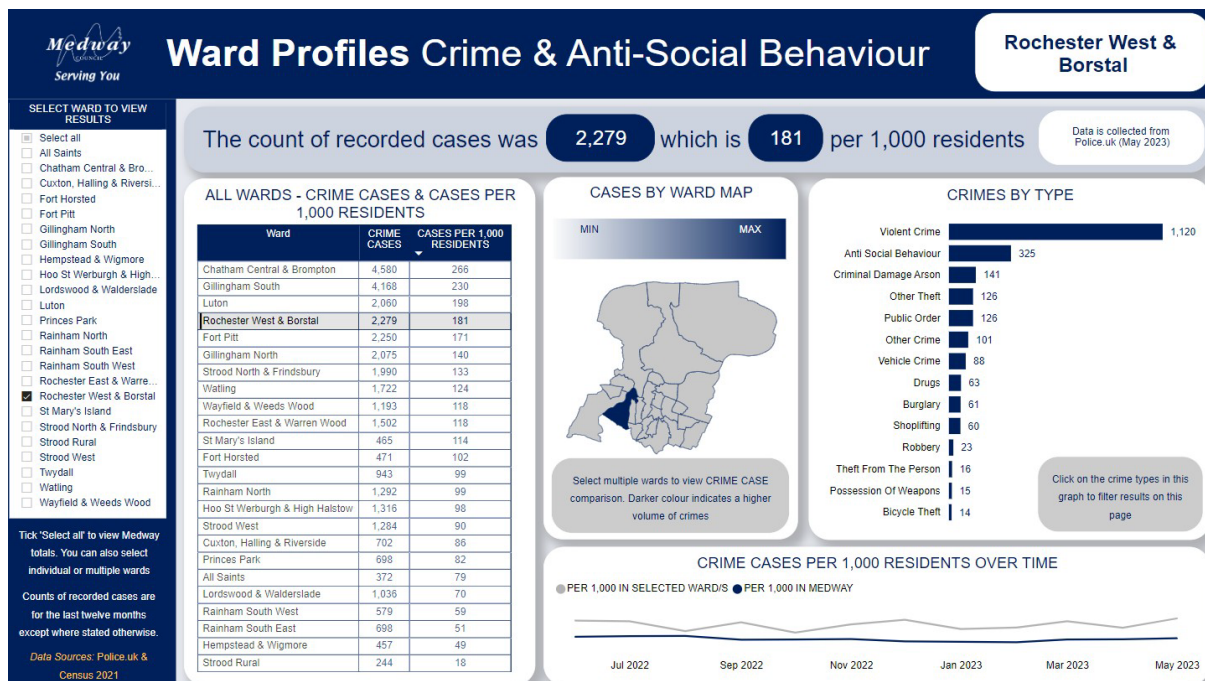


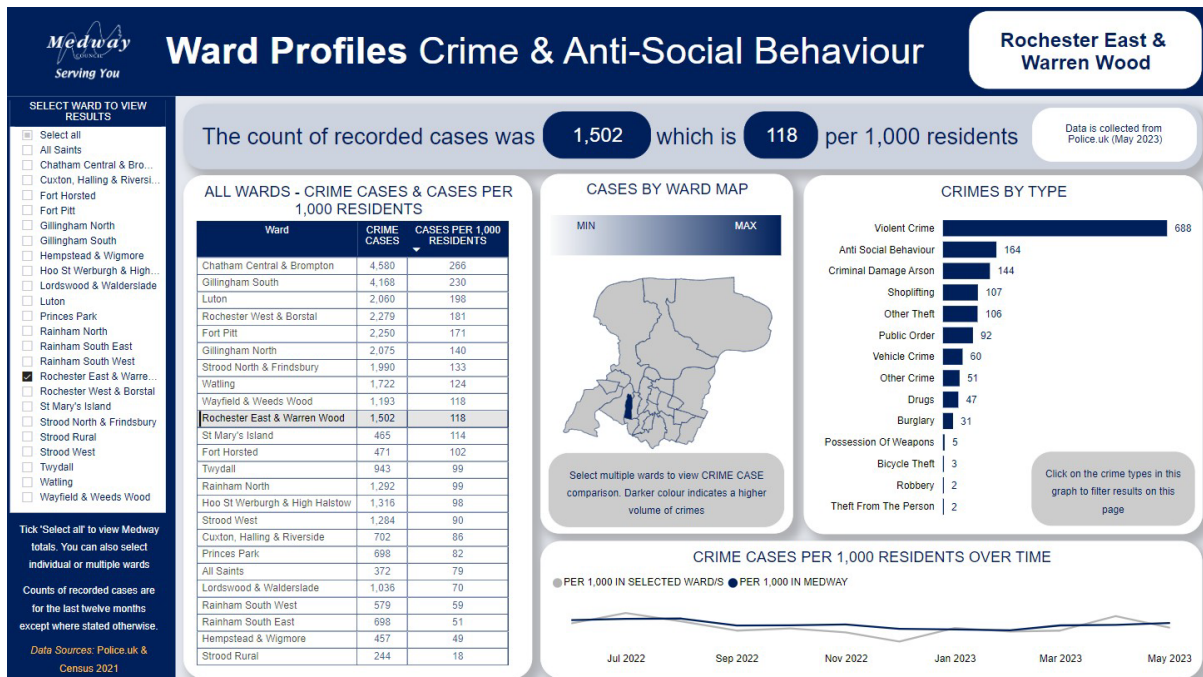
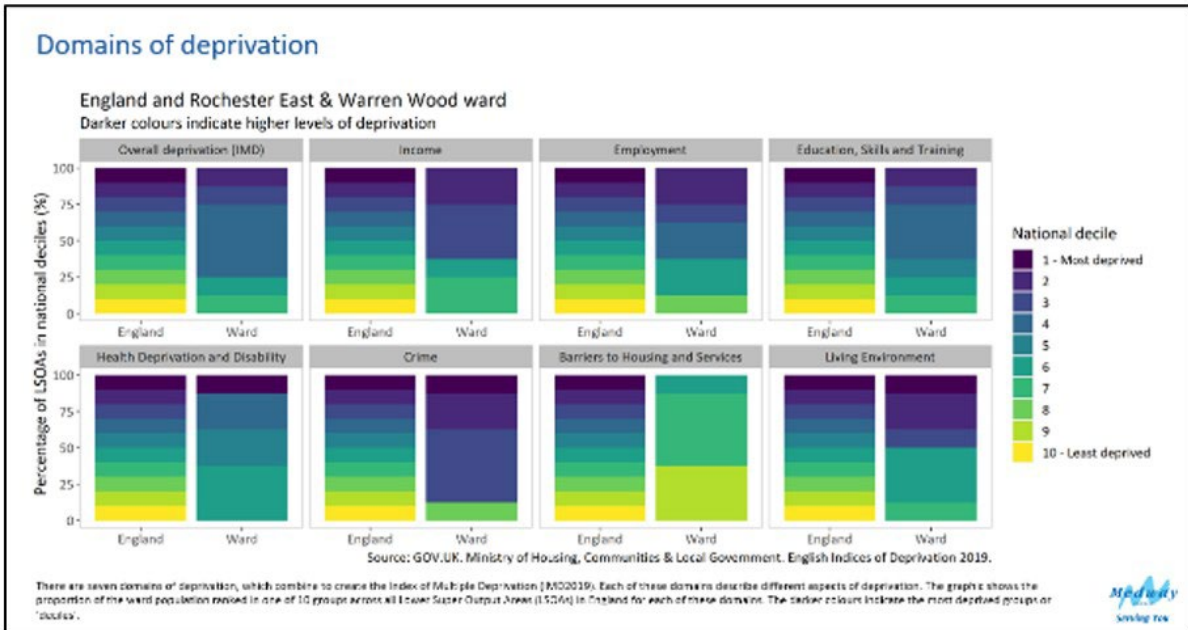
The evidence shows there is a concentration of on and off licensed premises in and around the Rochester Cumulative Impact Assessment (CIA) area. Both Rochester West and Borstal ward and Rochester East and Warren Wood ward, are deprived in the crime domain.

The Indices of Multiple Deprivation is a tool used to measure deprivation. There are seven domains of disadvantage including health and crime. 8.6% of areas in Medway are within the top 10% of the most deprived areas in England, with Rochester West and Borstal ward being the 4th most deprived for crime in Medway, and Rochester East and Warren Wood ward being the 10th.



Ward profiles, compiled by Medway Council Business Intelligence team, shows that within overall crime, the 'violent crime' category has the greatest number of reported cases, followed by 'anti-social behaviour' in both ward areas. Both types of crime are associated with alcohol consumption.



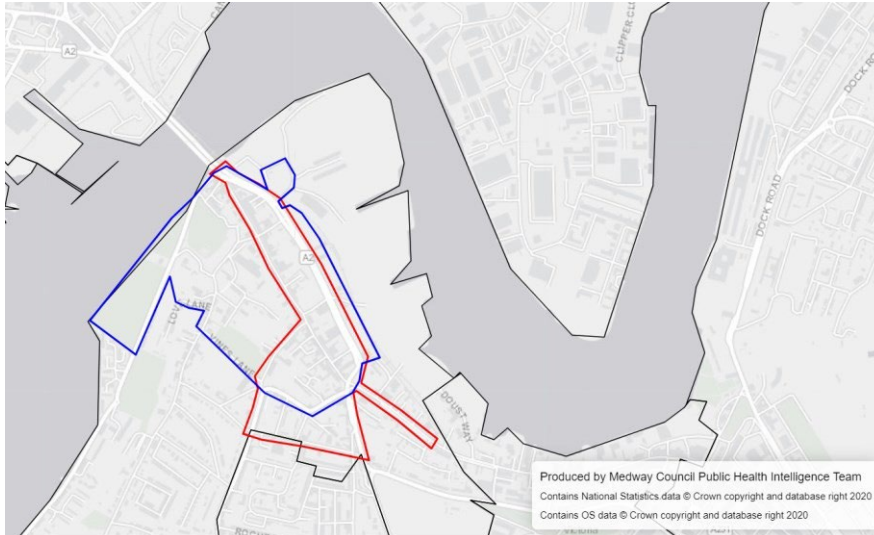


Crime and the prevalence of crime is a public health issue. Crime is part of the wider determinants of health as it effects people's physical and mental health and wellbeing.

Further data supporting the concerns around the prevalence of reported violent and sexual crime and anti-social behaviour covering the 6 months December 2024 to May 2025 in and around the CIP area has been included in Annex 1.

3 THE PREVENTION OF PUBLIC NUISANCE

The Rochester Public Spaces Protection Order (PSPO), which has been introduced due to issues with anti-social behaviour covers the majority of the Rochester CIP area.



There is evidence of alcohol related nuisance in the form of alcohol related litter, public urination and defecation and street drinking which is provided by the community evidence contained in the survey results and the focus group statements which forms the evidence to support the [CIA](#) in Rochester High St.

As part of the CIA evidence gathering, Public Health held a focus group in Rochester to assess the impact alcohol has, if any, on residents and businesses. All participants in the focus group were agreed the issues in Rochester High Street were spread across the day and into the evening and the night. There were 2 distinct issues. Rochester High Street had issues of people drinking during the day and causing alcohol related problems such as anti-social behaviour, nuisance, intimidation, begging and public urination. The second issue was connected to the night time consumption of alcohol from both on and off licensed premises, when residents were subject to fighting, noise, anti-social behaviour, public sex acts and disturbance.

4 SUMMARY

Rochester High Street and the surrounding area has unacceptable levels of alcohol related issues, including crime and public nuisance associated with the density of off licences. These problems are current, ongoing, and still of concern in this area.

Policy 10 from the [Statement of Licensing Policy](#) is the most relevant to this application. Policy 10 sets out the expectation of the Licensing Authority when determining applications for off licensed premises. This states that when an application is in a CIP area the Authority

will refer to the Cumulative Impact Policy, which outlines the expectations for applications made for off licenced premises in these areas.

The Cumulative Impact Policy states the Authority expects an application in a CIP area to contain a full explanation as to how the premises will not adversely affect the four licensing objectives. There is a rebuttable presumption of refusal by the Authority unless the applicant can show the grant of the licence will not add to the alcohol related issues outlined in the CIA. The application does not mention the CIA or any of the issues highlighted in it, so it is unclear how the requested variation will not add to the issues in the area.

The Director of Public Health believes it is reasonable to believe the sale of alcohol from this premises will contribute towards the alcohol related crime, disorder, and public nuisance in this area, which are current and ongoing. The Licensing Committee is therefore asked to refuse the application.

Professor David Whiting
Director of Public Health

Date 4 August 2025

For all communication, please contact **Barbara Murray**, Senior Public Health Project Officer at the address at the head of this representation or by the following:

E mail: barbara.murray@medway.gov.uk

Annex 1

1 ALCOHOL RELATED CRIME AND ANTI-SOCIAL BEHAVIOUR

Certain types of crime are more associated with alcohol consumption than others. Among crimes that are regarded as being '[alcohol related](#)' are:

- Violence including wounding and assault with or without injury
- Verbal and physical abuse
- Sexual offences including abuse and assault
- Harassment
- Domestic abuse
- Public disturbance and nuisance including street drinking, noise, littering, public urination and defecation and intimidation
- Harms to children including assault, witnessing violence and all types of abuse
- Driving offences including drink driving

Research from [The Office for National Statistics](#) states that victims perceived an offender to be under the influence of alcohol in 53% of violent incidents; a proportion which has remained consistent during the last 10 years.

Research has also shown that access to off licensed premises, such as convenience shops and supermarkets, had a greater association with violent crime than premises which only allow for on-site consumption of alcohol ([Trangenstein et al \(2018\)](#)). This is particularly the case for incidents of domestic abuse where incidents often happen in the home. Alcohol consumption, and domestic abuse, increased during the COVID 19 lockdowns, where alcohol could only be purchased from off licensed premises ([Institute of Alcohol Studies, 2021](#)).

The following information concerning crime in and near to the Cumulative Impact Policy (CIP) area has been obtained from [Police.UK](#), a publicly available website which maps crime data submitted by police services across the UK. Details on how this data is obtained and mapped can be found [here](#).

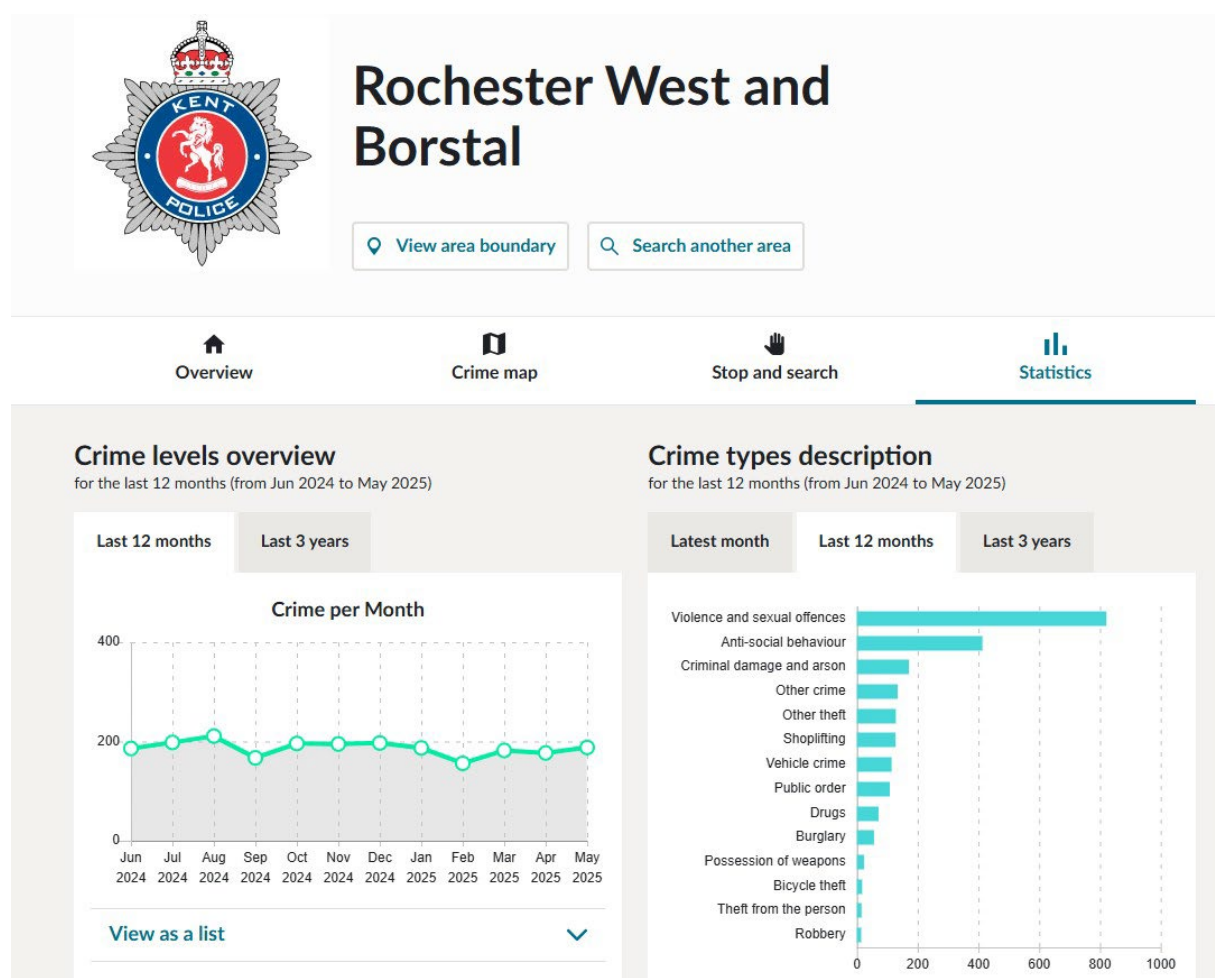
The latitude and longitude locations of the crimes indicated on the maps published on this site represent the approximate location as all reports are anonymised.

However, the figures do give an indication of the types of crimes committed in each of the two wards featured, with an idea of the general location shown on the following maps.

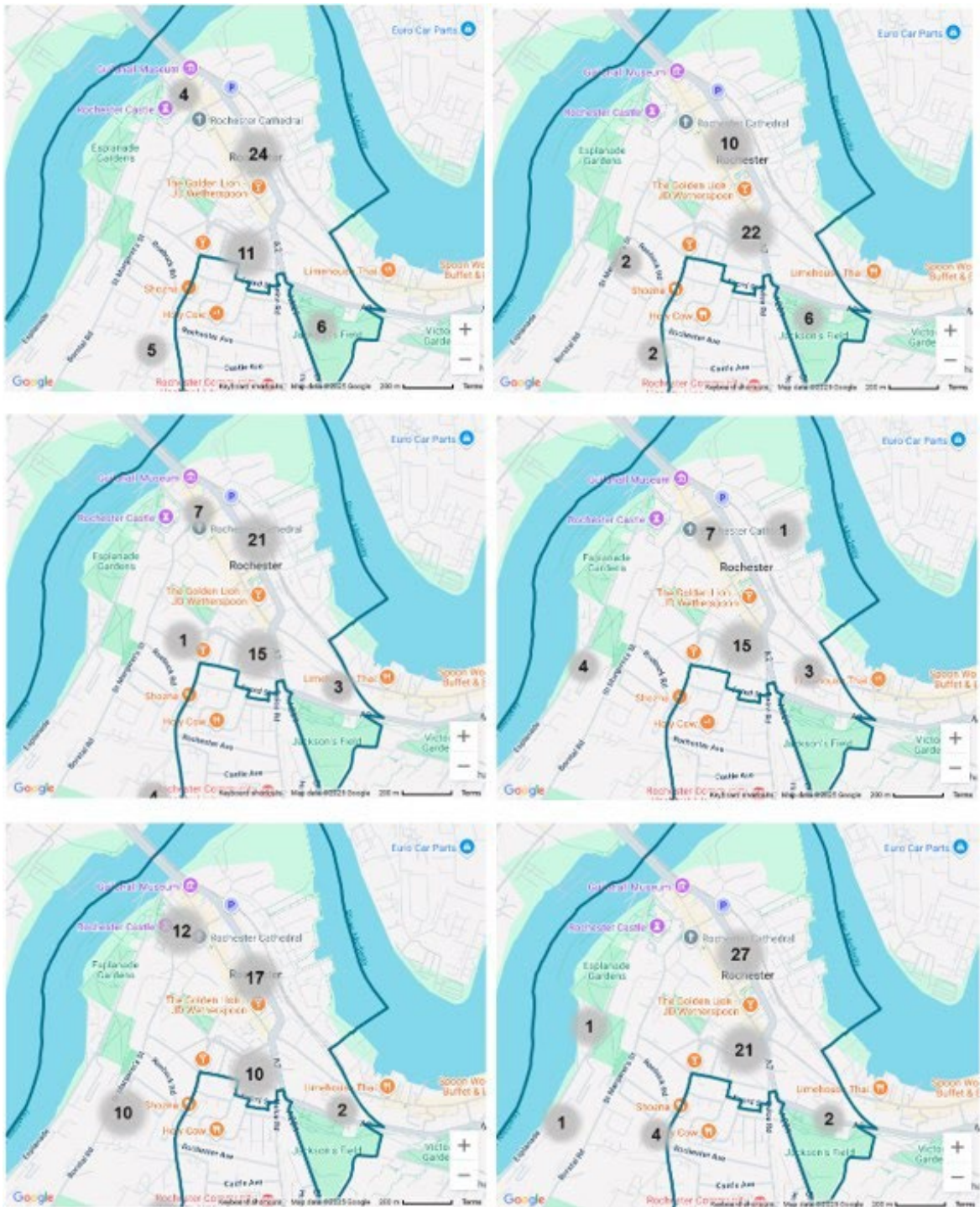
1.1 ROCHESTER WEST AND BORSTAL

In Rochester West and Borstal ward in the 6 months between December 2024 and May 2025 there were 413 reports of violence and sexual offences, and 187 reports of anti-social behaviour.

It can be seen from the screen shot below that these two types of reported crimes are the most common categories of reported crime in this ward, both being associated with alcohol consumption. Other types of crimes also associated with alcohol consumption shown in the below list are criminal damage and public order offences.



The following six maps show the approximate locations and number of reported violence and sexual offences with the CIP area in Rochester West and Borstal ward between May 2025 and December 2024.

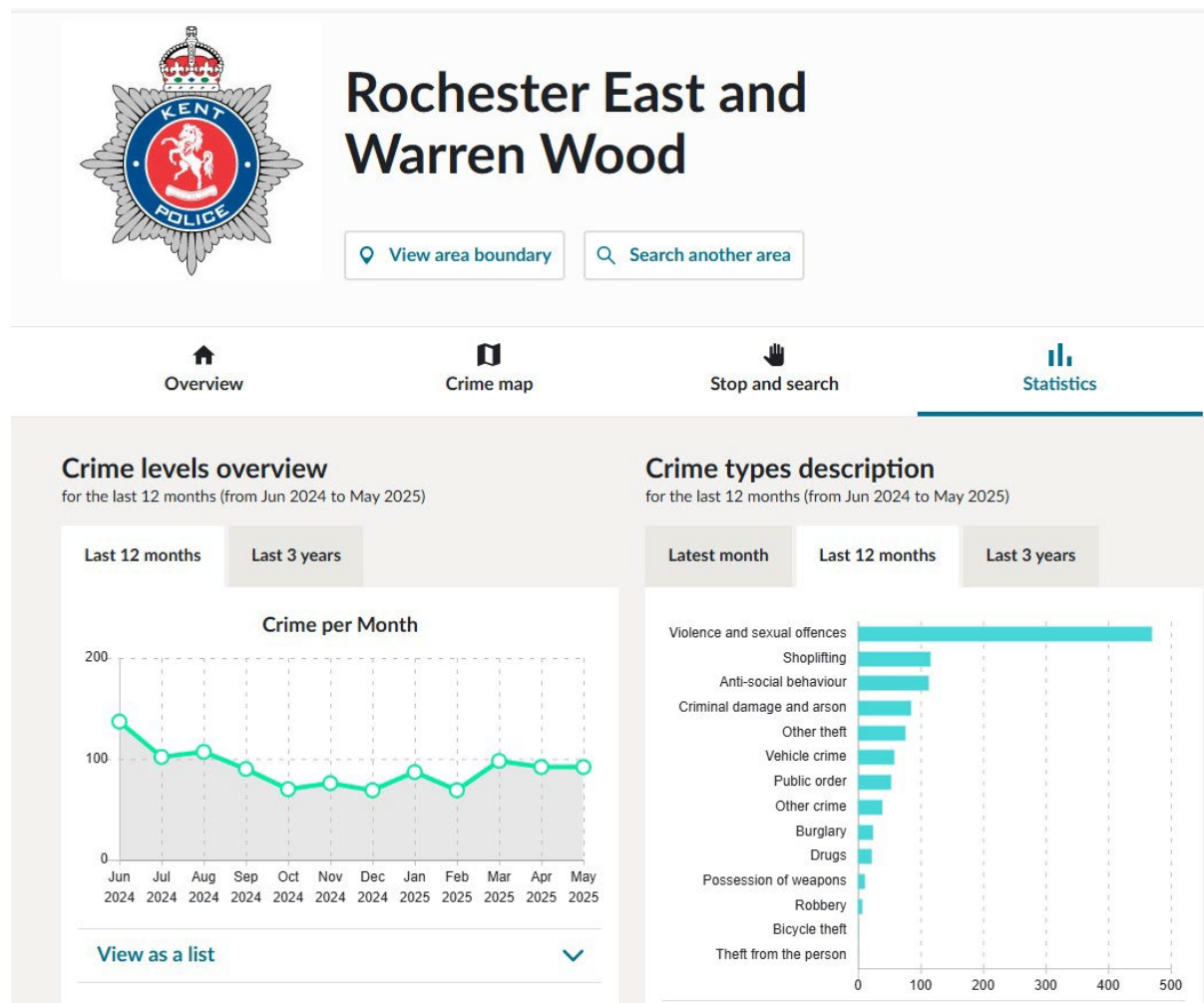


1.2 ROCHESTER EAST AND WARREN WOOD

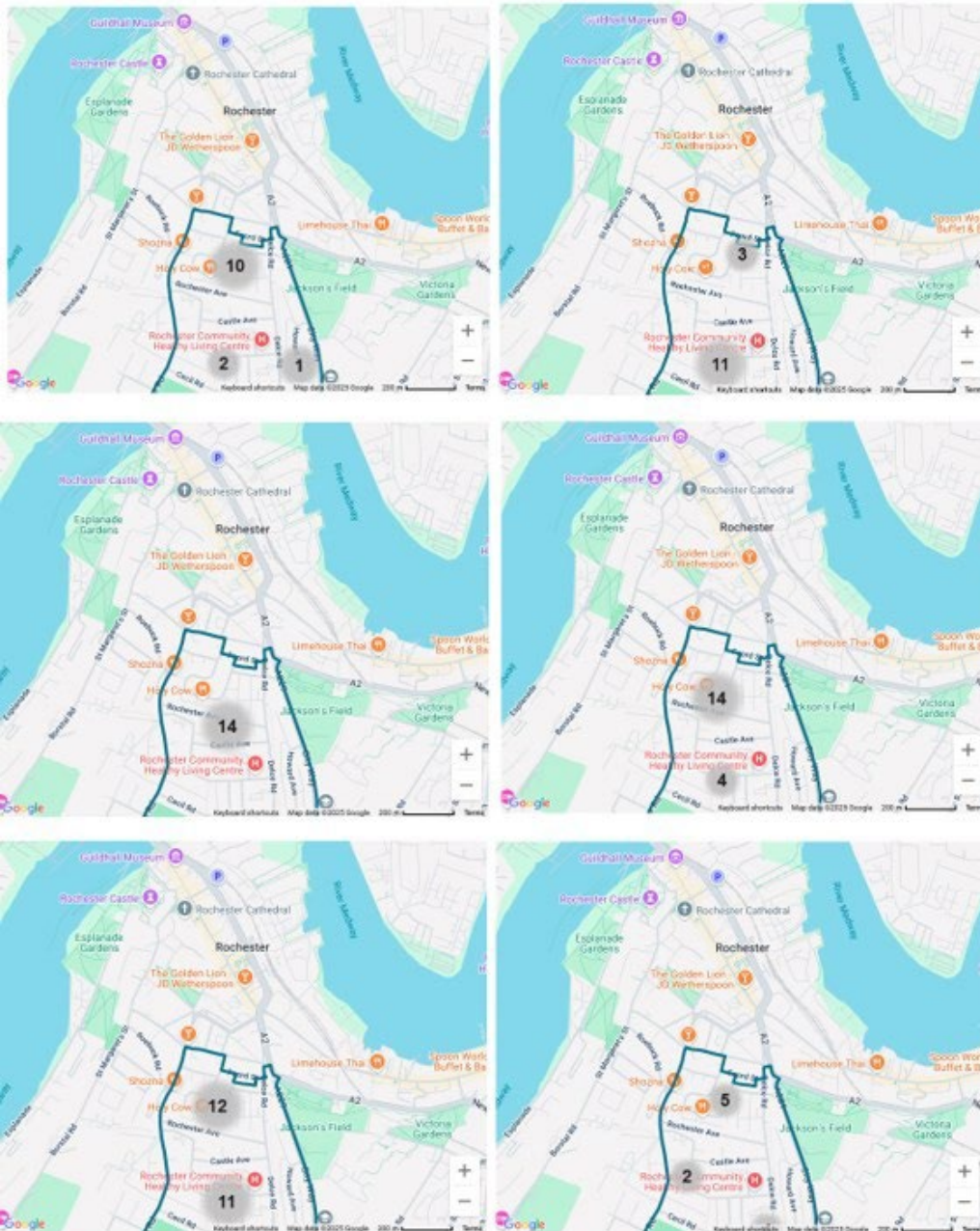
In Rochester East and Warren Wood ward in the 6 months between December 2024 and May 2025 there were 200 reports of violence and sexual offences, and 35 reports of antisocial behaviour.

It can be seen from the following screen shot that violence and sexual offences is the most common category of reported crime and is strongly associated with alcohol consumption.

Other types of crimes also associated with alcohol consumption shown in the below list are anti-social behaviour, criminal damage and public order offences.



The following six maps show the approximate locations and number of reported violence and sexual offences with the CIP area in Rochester East and Warren Wood ward between May 2025 and December 2024.



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