



**Kent
Police**

**Chief officer of police representation in relation to an
application for grant of premises licence made under Part
3 Section 17 Licensing Act 2003 (S18 Licensing Act 2003)**

Details of person making objection

Name of chief officer of police:	Supt Nick SPARKES 10648 - Divisional Operations Supt - North Division Command
Postal address: (Area headquarters)	Medway Police Station Purser Way Gillingham Kent ME7 1NE
Email address:	licensing.north.division@kent.police.uk or
Telephone number:	Licensing co-ordinator - Geoff Rowley Licensing officers - PC SMUTS 11250 PC SQUIRES 13355

Details of premises representation is about

Name of premises:	Budgens
Address of premises:	1 Block C, Pioneer Wharf, Chatham Waterfront, ME4 4HA
Date application received by police:	22/09/2025
Date representation sent to Licensing Authority:	17/10/2025
	<i>Must be within 28 days of receipt – The Licensing Act 2003 (Premises Licences and Club Premises Certificates) Regulations 2005. Part 4 Reg. 22.</i>

The chief officer of police has received an application for the grant of a premises licence made under the provisions of Section 17 Licensing Act 2003, and under Section 18 of that act, asks the Licensing Authority to consider these representations in respect of: -

Please tick one or more of the licensing objectives that the representation relates to:

Prevention of crime and disorder	<input checked="" type="checkbox"/>
Public safety	<input checked="" type="checkbox"/>
Prevention of public nuisance	<input checked="" type="checkbox"/>
Protection of children from harm	<input type="checkbox"/>

Is this a representation regarding the Designation of Premises Supervisor under S18 (9) Licensing Act 2003? ☐ Yes ☒ No

If yes, complete the following statement: -

The relevant representation within the meaning of S.18(6) of the Licensing Act satisfy the requirements of S.18(9) of that Act and are as follows:

Due to the exceptional circumstances of this case, I am satisfied that the designation of the person concerned as the premises supervisor under the premises licence would undermine the crime prevention objective because

N/a

Please use separate sheets where necessary

The relevant representations within the meaning of S.18(6) of the Licensing Act satisfy the requirements of S.18(7) of that Act and are as follows:

Please give the reason for the representation and detail the evidence supporting it:

Having assessed the application for a new premises licence for Budgens 1 Block C, Pioneer Wharf, Chatham Waterfront, ME4 Kent Police make representations against and request that the licence is not granted.

Please see additional word document detailing representations

Please use separate sheets where necessary

Suggested conditions that could be added to the licence to remedy the representation or other suggestions the Licensing Sub Committee may consider:

Please use separate sheets where necessary. Consider s106 Licensing Act 2003.

Please see additional continuation sheet with full details.

Please see attached word document detailing representations.

Signed: CLKNIGHT

Date: 17/10/2025

Print name: PC Carrie KNIGHT

Force Number: 11605

pp Chief Officer of Police for the Police Area in which the licensed premises are situated

Representation may be made at any time during the 28 consecutive days starting on the day after the day on which the application to which it relates was given to the authority by the applicant.

Please return this form along with any additional sheets to the Licensing Authority. This form must be returned within the statutory period.

Representation regarding Budgens Convenience store Chatham Waterfront Development

On Monday 22nd September 2025, Kent police were asked to assess a new premises licence application for Budgens, 1 Block C, Pioneer Wharf, Chatham Waterfront ME4 4HA. This marks the second application submitted by the premises.

The initial application submitted on 10th June 2025 received formal representations from Kent Police and was subsequently considered at a licensing panel hearing on 22nd July 2025. Following the hearing the decision was made not to grant the licence.

A new application, received on 22nd September 2025 has been assessed independently and on its own merits.

From assessing the documentation provided by the applicant, Kent police make representations and request that this is not granted for the following reasons -

The applicant has stated the premises will primarily be a convenience store, with intentions to offer alcohol sales for off-site consumption. The proposed service is aimed at meeting the needs for residents within this new build development located within Chatham Waterfront and the surrounding areas. Supporting documentation submitted by the applicant highlights the area is under substantial re development and has been for the past few years. It is the applicants view that a convenience store with the function to sell alcohol will be welcomed addition to the locality, primarily serving the anticipated influx of approximately 1000 new residents.

The intended operating schedule has indicated the sale of alcohol will be limited to the hours of 0900 hours to 2300 hours Monday to Sunday.

Kent police are familiar with the location in which Budgens intend to operate. The premises is situated within the main hub of the newly developed Chatham waterfront, which comprises of several newly constructed high rise residential apartments and commercial units. This location is positioned adjacent to Chatham bus station, a key central hub for public transport across the Medway towns.

In addition, the premises is within a close walking distance of Chatham town centre, consisting of several retail premises, restaurants, take aways and bars. It is directly opposite an entrance for The Pentagon Shopping centre a large indoor retail complex that attracts substantial footfall throughout the day.

The site falls within an area of Chatham that is subject Medway Cumulative impact assessment (CIA) and has a public space protection order - PSPO (previously known as alcohol-controlled zones) an area in which restricts drinking of alcohol in designated public areas. The information for this is outlined by Medway council's cumulative impact and stress area policy, which was last reviewed 2024 and expires in 2027, meaning it is relevant to the area.

The CIA identifies Chatham as being one of the most deprived areas of Medway which suffers an unacceptable high rate of alcohol related crime, disorder and public nuisance. This includes hidden harm such as domestic abuse offences, Anti-social behaviour and nuisance, environmental degradation such as littering, public urination and defecation, street drinking,

and drug misuse. Specific locations within the CIA that have been identified as hotspots for activity include High Street, Pentagon shopping centre, Best Street, New Road and the brook. The proposed Budgens premises is centrally located among these areas, placing it in a zone already under considerable pressure from alcohol-related issues.

Given the nature of the location and the concerns highlighted within the CIA/PSPO areas, it is incumbent upon the applicant to demonstrate a thorough understanding of the local area and address concerns associated within.

This includes conducting appropriate research into the area's challenges and considering how their proposed operation may impact the existing environment. It is the applicant's responsibility to propose robust and proactive measures—through enforceable conditions and operational practices—that will effectively mitigate risk and uphold the licensing objectives, particularly in relation to the prevention of crime and disorder, public safety, and the prevention of public nuisance.

From assessing the application and through consultation with the applicant's representatives, it is noted that the CIA has been acknowledged by them and a proposed operating schedule has been provided and assessed.

The applicant has stated there will be suitable staff training, there shall be no single sales of 330ml cans or bottles of any beer, lager or cider, no beer, lager or cider more than 6.5% ABV offered for sale, no miniature bottles of spirits of 10cl or below shall be sold from the premises. It is also noted no alcohol will be displayed within close to any access points and that it shall only be displayed as indicated on a plan, with spirits being stored behind the counter.

The applicant has stated that they will have adequate CCTV recording, an incident and refusals register and that of a challenge 25 policy in place. There will always be a minimum of 2 members of staff on duty.

Mention has been made that the proposed DPS will be from a senior officer within Charworth Ltd to maintain Head Office 'ownership' of the operation of this store. It is understood that the reasons for this is to maintain ownership at a higher level. A concern here would be would this person understand the concerns associated with area.

Given the operating schedule and the set of conditions outlined by the applicant, Kent Police considers most to be the standard practice and what would be expected by all premises licence holders across the county. These expectations reflect our commitment to ensuring public safety, responsible management, and compliance with licensing objectives.

From further consultation with the applicant's representatives and the documentation provided by them, Kent Police fully understand the area is under regeneration and that there is a multi-million-pound investment in the area. What is not as clear is why the premises require the function to sell alcohol and how this can add to the area?

While the applicant's optimism regarding the future regeneration of the area is noted, it is important to clarify that the purpose of the Cumulative Impact Assessment (CIA) is to provide an evidence-based framework for decision-making. The CIA is not merely a retrospective tool; it is designed to assess the impact of licensed premises on crime, disorder, and public nuisance within a defined area. Data is essential in identifying patterns and trends that inform future licensing decisions and policy development.

The applicant's reference to the CIA "looking backwards" appears to downplay the significance of the Cumulative Impact Assessment. The CIA remains a vital tool, reflecting ongoing concerns about alcohol-related harm and anti-social behaviour—issues that are still highly relevant, regardless of any future development plans. Initially adopted in 2021 with an expiry date set for 2024, the CIA was reviewed and extended until April 2027. The CIA is still very relevant to the area.

The Licensing Authority must consider the potential cumulative impact of granting additional licences in areas already identified as being under stress. Areas which have been recommended as adding to the area are establishments such as family-friendly venues, such as restaurants, community venues and other leisure businesses where the sale of alcohol is ancillary to the main activity.

Assurances by the applicant, that alcohol will not be sold to street drinkers or individuals engaged in anti-social behaviour, while welcome, are not enforceable conditions and cannot be relied upon in isolation. Licensing decisions must be based on robust controls, enforceable conditions, and alignment with the licensing objectives—particularly the prevention of crime and disorder and the protection of public safety.

Kent Police are of the opinion that there are no meaningful conditions that can be added to this licence that will ensure that the licensing objectives are being fully promoted and would ensure that the issues already experienced within this CIP area would not be exacerbated. Kent Police respectfully request that this application be refused.

