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Sent: 14 October 2025 10:57

To: Licensing <licensing@gravesham.gov.uk>

Subject: Formal Objection – Prem Lic App: AMT Coffee, Gillingham Railway Station, ME7 1XE

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Subject: Formal Objection – Premises Licence Application: AMT Coffee, Gillingham Railway Station, Railway Street, Gillingham ME7 1XE

Dear Licensing Team,

I am writing to submit a formal objection and request for outright refusal of the premises licence application for AMT Coffee, Gillingham Railway Station, Railway Street, Gillingham ME7 1XE, under the Licensing Act 2003.

This objection is made in accordance with Section 18(3)(a) of the Act and the Medway Council Statement of Licensing Policy (2023 Revision), including the Cumulative Impact Policy covering the Gillingham town centre and station area.

1. Failure to Promote the Licensing Objectives

The application fails to demonstrate compliance with the four licensing objectives and presents an unacceptable risk to crime prevention, public safety, and child protection.

a. Prevention of Crime and Disorder

- The area immediately surrounding Gillingham Railway Station is identified by Kent Police as a persistent hotspot for antisocial behaviour, theft, violence and public order offences.
- Recorded incidents in 2024–25 include assaults and disturbances involving football supporters outside the station, as well as arrests for disorder and offensive conduct.
- The applicant offers only generic assurances about CCTV and staff training, with no detailed operating plan, liaison arrangements with Kent Police or British Transport Police, or incident-reporting protocols.
- Given the station's transient population, alcohol sales or late-trading activity would exacerbate existing crime risks and undermine community safety.

b. Protection of Children from Harm

- The station is heavily used by school and college pupils travelling at peak times.
- The application fails to show robust controls such as a Challenge 25 policy, refusal logs, or supervision arrangements.
- Introducing a licensed premise within the station concourse or its approach routes exposes minors to alcohol-related activity in a high-traffic environment, contrary to the licensing objective of protecting children from harm.

c. Public Safety and Public Nuisance

- The applicant provides no evidence of crowd-management measures, safe queuing, or capacity control during peak commuter or event periods.
- Increased congregation around the outlet could obstruct public passageways, elevate risks of nuisance, and impede emergency access routes within the station.

2. Cumulative Impact and Policy Grounds for Refusal

- Gillingham Railway Station lies within or directly adjacent to an area identified in Medway Council's Cumulative Impact Assessment (CIA 2023) as suffering significant alcohol-related disorder.
- The CIA establishes a rebuttable presumption to refuse any new licence unless the applicant can clearly demonstrate that granting it will not add to cumulative impact.
- The applicant has provided no such evidence, no crime-prevention plan, and no community consultation.
- Accordingly, under Policy 14.5, the Authority is required to refuse applications that fail to rebut this presumption.

3. Inadequate and Poor-Quality Application

- The operating schedule lacks basic legal and operational detail expected of a competent licence applicant.
- There is no confirmed Designated Premises Supervisor with a valid personal licence number, no defined alcohol-sales arrangements, and no specified control measures.
- Such deficiencies indicate an inability to manage a licensed premise responsibly within one of Medway's most sensitive transport locations.

4. Recommendation

For the reasons above, I request that the Licensing Sub-Committee refuse this application in its entirety under Section 18(3)(b) of the *Licensing Act 2003*, on the following grounds:

1. Failure to promote the four licensing objectives;
2. Location within a high-risk, crime-affected area;
3. Failure to rebut the presumption of refusal under the Cumulative Impact Policy;
4. Poor-quality, non-compliant operating schedule; and
5. Potential harm to child and commuter safety within a public transport environment.

The proposal presents a clear and unjustified risk to the local community, commuters, and children who use Gillingham Station daily. It should therefore be refused outright.

Yours faithfully,