

From: Ross Hutchins

Sent: 22 October 2025 17:32

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

Subject: Formal Objection – Premises Licence Application: Asankabites Ltd, 106 High Street, Rochester, ME2 4TR

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Dear Licensing Team,

I am writing to formally object to the premises licence application submitted by Asankabites Ltd for 106 High Street, Rochester ME2 4TR, dated 9 September 2025.

This objection is made under Section 18(3)(a) of the Licensing Act 2003 and in accordance with the Medway Council Statement of Licensing Policy (2023 revision), including the Cumulative Impact Policy (CIP) applicable to Strood High Street.

Having reviewed the application in full, I respectfully request that the Licensing Authority refuse the application outright on the following grounds.

1. Failure to Promote the Licensing Objectives

The application does not demonstrate how the four licensing objectives will be met, and in several respects contradicts them:

a. Prevention of Crime & Disorder

- The applicant offers only a vague reference to CCTV and “training,” with no detail on coverage, storage, incident logging or refusal procedures.
- Kent Police data (Medway District, 2024) identifies Strood High Street as a persistent hotspot for alcohol-related disorder, assaults and antisocial behaviour.
- No reference is made to Pubwatch, responsible alcohol sales, or cooperation with enforcement partners—contrary to Policy 5.1.2 of the Medway Licensing Policy.

b. Public Safety

- There is no evidence of a fire-safety plan, occupancy limit, risk assessments, or first-aid provision.

- Statements such as “all fire extinguishers in place” are unverified and fall below the standards expected under the s.182 Home Office Guidance (para 2.9).

c. Prevention of Public Nuisance

- The area already suffers recurring complaints regarding noise, littering and alcohol-related nuisance.
- The applicant’s promise of “noise control and lighting systems” provides no measurable controls (e.g. noise limiters, door supervision, waste protocols, or dispersal arrangements).
- The premises are in a mixed residential zone where even moderate late-evening noise would disturb nearby residents.

d. Protection of Children from Harm

- No reference is made to a Challenge 25 policy, refusal logs or refresher training.
 - The applicant’s general statement on “age verification” fails to meet the requirements of Policy 7.3, which expects robust, auditable proof-of-age procedures.
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2. Location within a Cumulative Impact Policy Zone

The premises lie inside the Strood Town Centre CIP Area, where a *rebuttable presumption to refuse* new alcohol licences applies unless an applicant clearly demonstrates that the proposal will not add to existing problems.

The applicant has not provided any evidence addressing cumulative impact, mitigation, or community engagement.

Under Policy 14.5, the authority *must refuse* applications that do not rebut this presumption.

3. Poor Quality and Non-Compliant Application

The submission is incomplete and fails to satisfy the requirements of Section 17(3) of the Licensing Act 2003:

- The business type is unclear (restaurant, takeaway or off-sales).
- No competent Designated Premises Supervisor is verified by licence number or issuing authority.
- No consultation, risk assessment or professional operating schedule has been provided.

These omissions demonstrate a lack of understanding of statutory duties and an inability to operate responsibly within an area already suffering significant alcohol-related harm.

4. Conclusion and Recommendation

In light of the above, I request that the Licensing Sub-Committee refuse the 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. Inadequate and non-compliant operating schedule.
3. Location within a Cumulative Impact Policy area.
4. Absence of credible evidence to rebut the presumption of refusal.
5. Non-compliance with Medway's Statement of Licensing Policy and Home Office Guidance.

This application, as drafted, represents an unacceptable risk to crime prevention, public safety and community amenity. I therefore urge the Committee to refuse the licence outright.

Yours faithfully,
Steven Hutchins

This can be shared with the applicant but redacted for public circulation as required.