

## Appendix D

From: ADMIN - ATLAS LICENSING

Sent: 12 August 2026 14:48

To: Franco De Fazio

Subject: RE: Objection to Application for a New Off-Licence 75 Richmond Road - Gillingham

Importance: High

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Dear Licensing Team,

We write on behalf of the Applicant in response to the representation received regarding the above premises licence application. The Applicant has carefully considered the concerns raised and wishes to make clear that they are taken seriously. The Applicant is very familiar with the Richmond Road area, having operated the existing business at 124 Richmond Road for approximately 26 years, and understands local concerns regarding street drinking, anti-social behaviour, litter, noise, parking and the protection of children. The Applicant does not wish to add to those problems. The intention is to continue operating as a responsible local business, maintain a good relationship with residents and neighbouring businesses, and work constructively with the local community, Kent Police, Medway Council and other responsible authorities.

It is also important to clarify that this is not a new business or a new operator coming into the area. The Applicant is simply relocating the existing long-established business from 124 Richmond Road to 75 Richmond Road. If the premises licence for 75 Richmond Road is granted and the business relocates, the existing premises licence at 124 Richmond Road will be surrendered, as the Applicant will no longer be trading from that address. Accordingly, this should not be viewed as the Applicant seeking to operate two licensed premises in Richmond Road, but rather as the relocation of the existing business operation to a new premises. The Applicant has been part of the local community for approximately 26 years and wishes to continue serving that community from the new premises.

The operating schedule already contains a number of safeguards designed to promote the licensing objectives, including sufficient competent staff being on duty during licensable activities, staff training on responsible alcohol sales, drunkenness and underage sales, records of staff training and refresher training being maintained, comprehensive CCTV covering entrances, exits, tills and the shop floor with recordings retained for 31 days and made available to the Police, reporting of criminal incidents to the Police, Challenge 25, acceptable photographic identification, a refusals register, regular underage-sales prevention training, fire safety and emergency procedures and notices asking customers to leave quietly and respect neighbouring residents. These measures demonstrate that the Applicant has considered the concerns raised and is committed to responsible day-to-day management.

The Applicant also understands the concerns raised regarding crime and disorder in the wider area. However, it is relevant that no representation has been received from Kent Police. As a responsible authority with access to relevant crime, incident and local

intelligence information, Kent Police have had the opportunity to consider the application and the proposed operating schedule and have not made a representation against the application. The Applicant does not suggest that the absence of a Police representation amounts to an endorsement, but it is relevant context when considering whether this particular premises is likely to increase crime and disorder.

The Applicant is also communicating directly with the Planning Officer regarding Planning's separate representation and is in agreement with the condition proposed by Planning, namely that the premises will operate in accordance with any planning permission granted. The Applicant is therefore working constructively with Planning and Licensing with a view to resolving that representation by agreement.

The representation also refers to the number of existing licensed premises and off-licences in the surrounding area. The Applicant understands why a resident may raise this as a concern, but respectfully asks that the application is considered in the context of how this particular premises will operate. This is not an entirely new business being introduced into Richmond Road. The Applicant has already traded in the area for approximately 26 years and is simply relocating the existing business. Once the move has taken place, the licence at 124 Richmond Road will be surrendered. The Applicant's intention is not to encourage irresponsible alcohol consumption or street drinking. Alcohol will form part of the wider convenience-store offering and will be sold subject to the safeguards contained within the operating schedule.

The Applicant also recognises residents' concerns about litter, street drinking, noise and congregation. The Applicant's intention is to discourage such behaviour, not contribute to it. Customers will be asked to leave quietly, and the Applicant is willing to pay reasonable attention to the immediate frontage of the premises and respond constructively if genuine problems connected with the store are identified. The Applicant would like local residents to feel able to raise concerns directly so that they can be considered and, where appropriate, acted upon promptly. The Applicant is willing to engage with residents, neighbouring businesses and the responsible authorities and to discuss reasonable and proportionate measures where they would genuinely assist.

The representation also refers to a photograph of an individual in the area. The Applicant understands that the individual pictured is in fact an employee of the nearby Best One store. The Applicant therefore respectfully submits that the photograph should not be taken as evidence of behaviour caused by or connected with the Applicant's premises at 75 Richmond Road. Nevertheless, the Applicant understands the wider concern that the resident is seeking to raise regarding congregation in the area and remains willing to work with the local community to discourage any such issues associated with customers of the premises.

The Applicant has also noted the concerns raised regarding illegal parking, vehicles stopping near bus stops and obstruction of pavements. The Applicant understands the importance of keeping the highway, pavements and surrounding area safe for residents, pedestrians and

schoolchildren. The Applicant will seek to ensure that deliveries connected with the premises are undertaken responsibly and that delivery drivers associated with the business are reminded not to obstruct pavements, bus stops or access points. At the same time, the Applicant cannot reasonably be held responsible for unlawful parking by unrelated motorists, customers of other businesses or delivery drivers serving other premises in the area. If any parking issue is identified as being directly connected with the Applicant's premises, the Applicant will nevertheless seek to address it promptly and cooperate with the appropriate authorities.

The Applicant fully understands the concern arising from the proximity of Burnt Oak Primary School and agrees that the protection of children is extremely important. A strict Challenge 25 policy will operate, staff will receive regular underage-sales training, acceptable photographic identification will be required and a refusals register will be maintained. Staff will also remain alert to suspected proxy purchases. In recognition of the proximity of the school and the concerns raised by the local community, **the Applicant is willing to offer the additional condition that no more than three unaccompanied school-age children shall be permitted inside the premises at any one time. Staff shall monitor entry to the premises and take reasonable steps to ensure compliance with this condition, and appropriate signage will be prominently displayed.** The Applicant considers that this additional measure will assist staff in supervising younger customers, discourage large groups of schoolchildren from congregating inside the premises and further demonstrate the Applicant's commitment to the protection of children and the local community.

The Applicant appreciates that the representation has been made because of genuine concerns about the area and does not seek to dismiss or minimise those concerns. Having traded locally for approximately 26 years, the Applicant has every interest in ensuring that Richmond Road remains a safe, pleasant and successful area for residents, neighbouring businesses, parents, children and customers. The Applicant wishes to continue being part of the local community and to operate the relocated premises responsibly.

In light of the safeguards already offered, the absence of a representation from Kent Police, the Applicant's agreement with Planning's proposed condition, the additional measure concerning school-age children, the fact that this is a relocation of a long-established existing business rather than a new operator, and the Applicant's commitment to responsible operation and community engagement, we respectfully invite the representor to reconsider the objection. If any particular concerns can be addressed through reasonable and proportionate measures, the Applicant would be very happy to discuss them with a view to reaching an agreed position wherever possible.

Kind regards,

Zilan Arda