

Appendix F

From: DAVID BAINS

Sent: 16 August 2026 20:05

To: Franco De Fazio <franco.defazio@gravesham.gov.uk>; Licensing <licensing@gravesham.gov.uk>

Subject: Counter-Representation to Applicant's Legal Response

Dear Franco

Please see below my Counter-Representation to Applicant's Legal Response, I would like to this addressed to the Panel Committee and the Applicant's Legal Party:

I submit this counter-representation as a local resident, relying solely on common sense, lived experience, and direct observation. I do not have access to legal specialists, licensing consultants, or solicitors. The Applicant, by contrast, has engaged legal representatives to promote their application and frame their narrative. This imbalance in resources should not diminish the weight of genuine community concerns or the lived realities of those who experience the consequences of licensing decisions every day.

The Applicant's legal team repeatedly describes this proposal as a "relocation." However, the Licensing Act 2003 requires the Committee to consider the impact on the area, not the Applicant's commercial convenience. Regardless of how the Applicant chooses to present it, granting a licence at 75 Richmond Road would increase alcohol availability at a location already suffering serious alcohol-related harm.

1. Prevention of Crime and Disorder

Richmond Road and the surrounding North Ward are already saturated with off-licences. Within short walking distance, residents face multiple outlets contributing to:

- Street drinking
- Anti-social behaviour
- Loitering and congregation
- Littering and environmental degradation
- Increased demand on police and community safety services

These are not hypothetical risks. They are daily realities for residents.

North Ward already experiences elevated levels of alcohol-related disorder. Introducing another off-licence — regardless of the Applicant's trading history — will intensify existing problems and undermine ongoing efforts to reduce crime.

The Applicant's legal team highlights the absence of a Police representation. Kent Police's silence does not mean the area is safe. It simply means they have not formally objected. Residents live with the consequences of alcohol-related disorder every day, and those consequences are not erased by the absence of a formal Police submission.

2. Public Safety

The Applicant's legal representatives argue from a position of technical compliance. Residents, however, experience the real-world consequences of increased alcohol availability: aggressive behaviour, unsafe gatherings, and public intoxication.

Traffic and road-safety concerns are already severe. Illegal parking occurs daily outside nearby businesses, including delivery drivers obstructing bus stops and pavements. A new off-licence will attract additional vehicles stopping unlawfully, creating hazards for:

- Pedestrians
- Bus users
- Parents with prams
- Schoolchildren walking to Burnt Oak Primary School

The Applicant's assurance that they will "remind delivery drivers" is not sufficient. Residents know that real-world behaviour rarely matches theoretical promises.

Relevant Case Study – Ordnance Street, Chatham

Medway Council's Public Health Directorate stated:

"This is a very deprived area... More than half of domestic violence incidences are alcohol-related. It is also proven that the number of licensed outlets in an area increases the number of domestic violence incidents."

North Ward shares the same risk factors. The same harms apply. The same logic should apply: refusal.

3. Prevention of Public Nuisance

Residents already experience persistent nuisance linked to existing off-licences, including:

- Noise disturbances
- Littering
- Public drinking
- Congregation in residential areas

The Applicant's legal response attempts to dismiss evidence of street drinking by suggesting it is unrelated to their premises. However, I wish to clarify paragraph 8 of their submission:

I stated — accurately — that individuals regularly sit and drink on Trinity Road near Best One, leaving bottle tops and waste in plant boxes and on pavements. This demonstrates that street drinking increased after Best One was granted its licence.

Furthermore, I have personally witnessed drinking outside Medway Supermarket, 124 Richmond Road, operated by the Applicant.

The Applicant's legal team may argue that these incidents are "not their responsibility," but residents experience the cumulative impact of multiple outlets. A further licence will increase footfall, noise, and late-night disturbances.

4. Protection of Children from Harm

This licensing objective is severely compromised by the location of the proposed premises.

The application is directly beside an infant and primary school.

Children walking to and from school already encounter:

- Public drinking
- Disorderly behaviour
- Discarded alcohol containers
- Intimidating situations involving intoxicated individuals

Adding another off-licence immediately adjacent to the school will:

- Normalise alcohol misuse in front of children
- Increase exposure to harmful behaviour
- Create an environment wholly inappropriate for a school setting

The Applicant's legal team offers conditions such as limiting unaccompanied schoolchildren to "three at a time." This does not address the core issue: the premises should not be licensed at all in this location.

No responsible licensing authority should approve an alcohol outlet directly beside a primary school in an area already struggling with alcohol-related harm.

Conclusion

I am a resident speaking from lived experience, without legal representation, relying on common sense and the reality of daily life in Richmond Road. The Applicant has legal specialists presenting their case; I have only my observations and the licensing objectives intended to protect the community.

The cumulative impact of existing off-licences is already severe. Crime, disorder, public nuisance, safety risks, and harm to children are all present and increasing.

Approving a licence at 75 Richmond Road — especially beside an infant and primary school — would be:

- Unsafe
- Detrimental
- Contrary to all four licensing objectives

- Inconsistent with Medway Council's public-health evidence
- Harmful to residents, families, and vulnerable individuals

The number of off-licences within a short walking distance is unsustainable and risks triggering a price-war on cheap alcohol, further driving harmful consumption and community decline.

For these reasons, I respectfully request that the Licensing Committee refuse this application in full.

David Bains

Sent from my iPad