



Director of Public Health
Public Health Directorate Medway Council,
Gun Wharf,
Dock Road,
Chatham, Kent. ME4 4TR
11th May 2026

LICENSING ACT 2003 – VARIATION OF A PREMISES LICENCE APPLICATION

Wards, 53, High St, Gillingham

1 GENERAL COMMENTS

The Director of Public Health is making representations concerning an application for the variation of the above premises licence. The representations are made against the following licensing objectives:

- The prevention of crime and disorder
- The prevention of public nuisance

This premises is situated in the High Street, Gillingham, in a busy area consisting of a mix of businesses and shops but also adjacent to residential areas. This is one of the most densely populated and most deprived areas of Medway.

This premises is located within the Gillingham cumulative impact assessment (CIA) area which covers Gillingham High St and the surrounding area. There is strong evidence of high levels of alcohol related crime, disorder and public nuisance associated with a density of off licensed premises in the Gillingham CIP area.

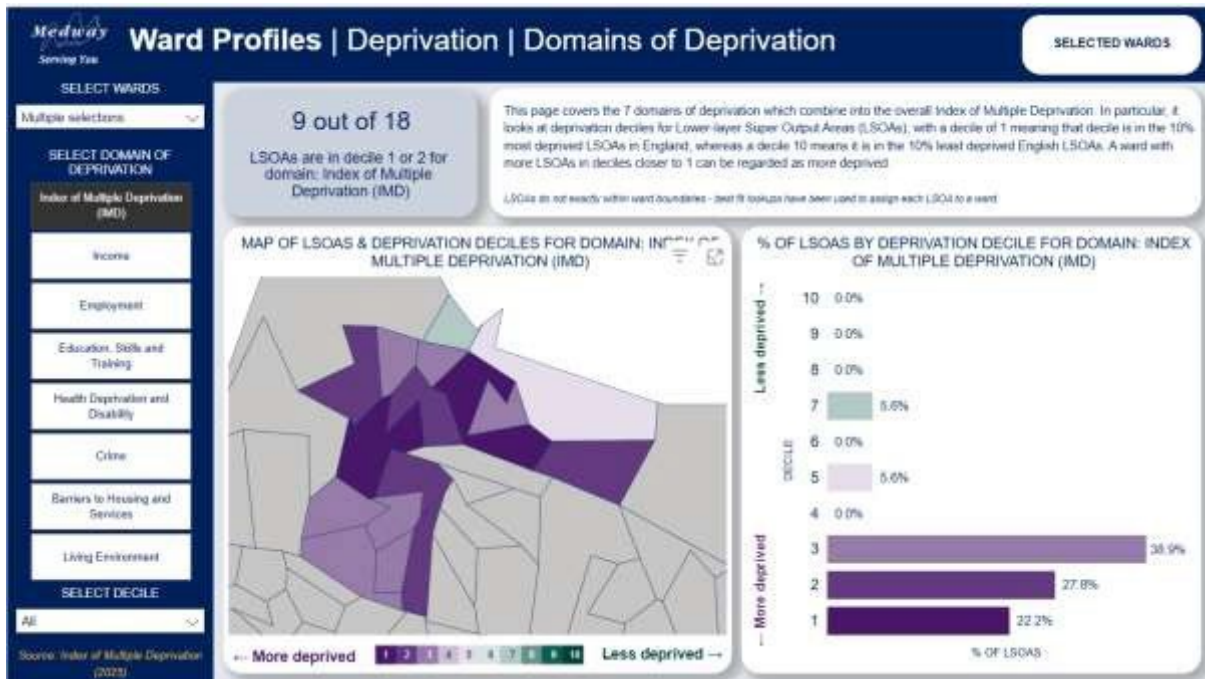
2 THE PREVENTION OF CRIME AND DISORDER

The evidence used to support the CIA relates primarily to anti-social behaviour, domestic abuse, assault, public order, and criminal damage. This area has been identified as a hot spot for a range of alcohol related crime.

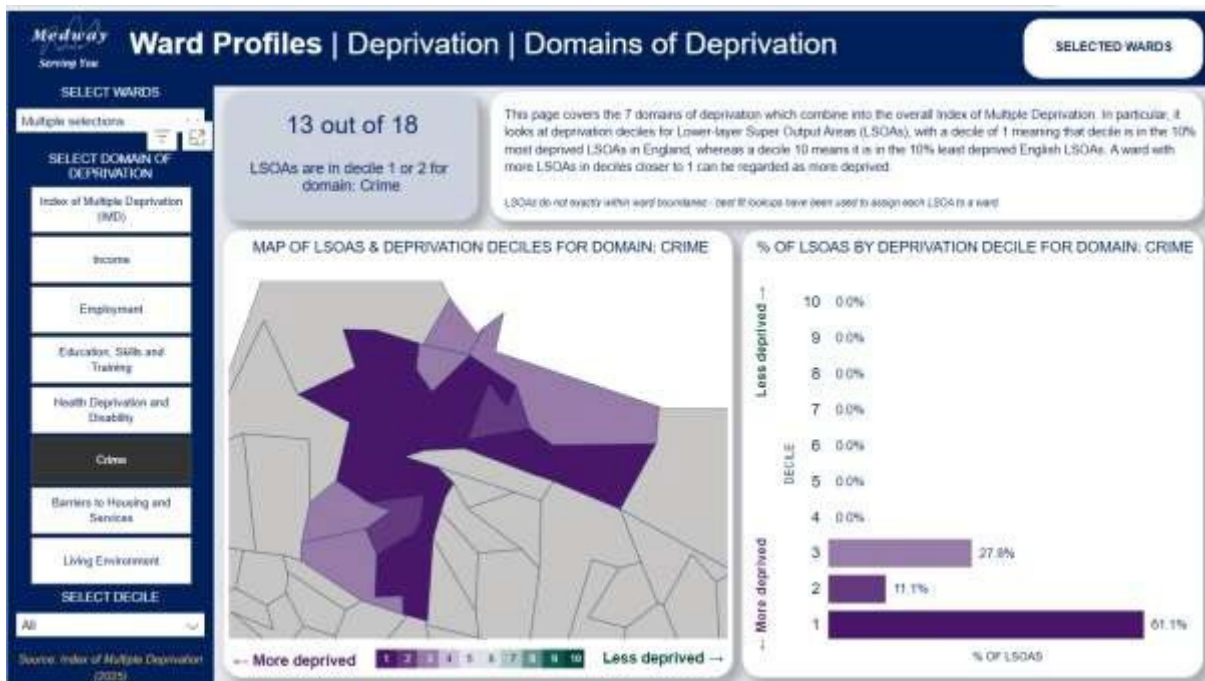
2.1 DEPRIVATION

The [Indices of Multiple Deprivation](#) is a tool used to measure deprivation. There are seven domains of disadvantage including health and crime.

The Gillingham CIP area borders some of the most deprived areas in Medway. Gillingham South and Gillingham North both have high levels of deprivation as shown in the following domains of deprivation graphic.



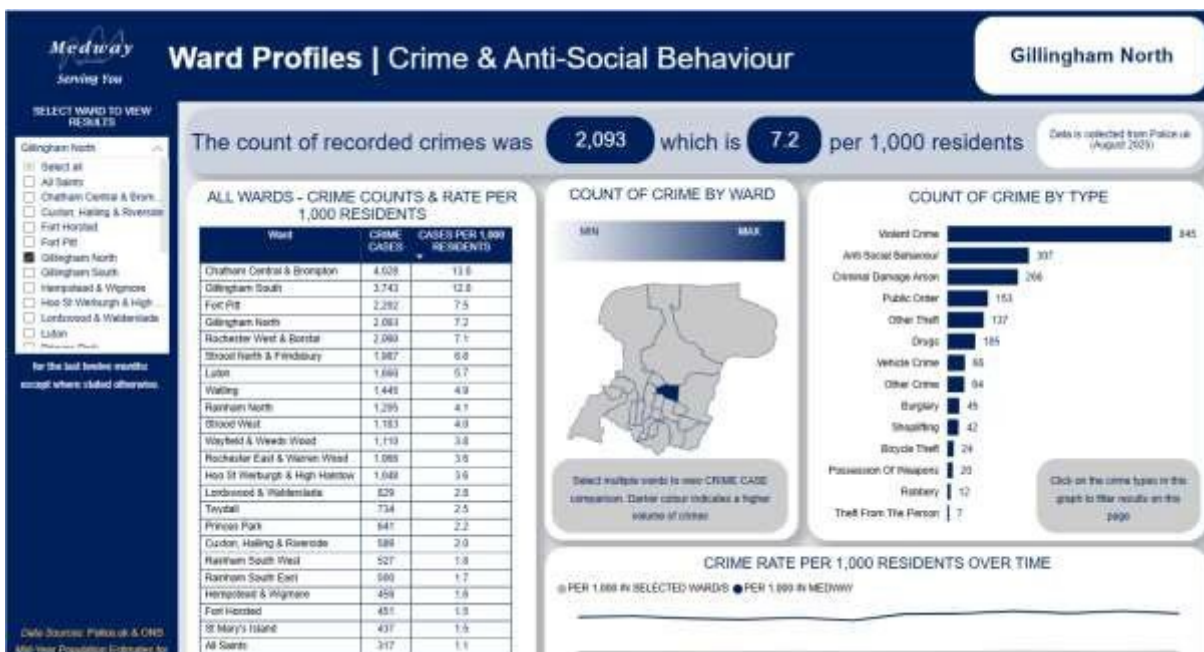
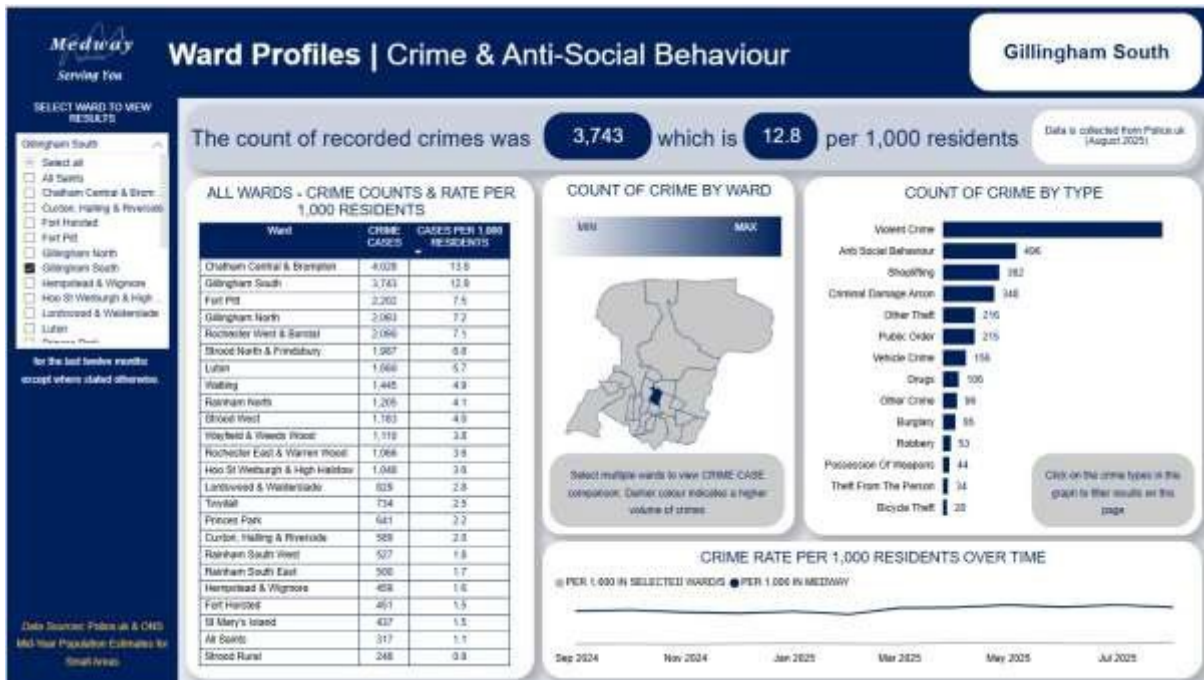
2.2 CRIME DEPRIVATION



Gillingham South ward is the 2nd most deprived area for crime, and Gillingham North ward is the 4th most deprived in Medway.

Ward profiles, compiled by Medway Council Business Intelligence team, shows that within overall crime, the 'violent crime' category has the greatest number of reported cases,

followed by 'anti-social behaviour' in both wards. Both types of crime are associated with alcohol consumption.



There is evidence to support an association between socioeconomic deprivation and higher levels of alcohol-related crime, disorder and public nuisance. Evidence shows that more deprived areas have a greater density of off-licensed premises and also experience disproportionately high rates of alcohol-related violence, anti-social behaviour, and alcohol-related nuisance, despite similar or lower average levels of alcohol consumption compared with less deprived areas. This reflects the increased vulnerability of deprived communities to alcohol-related impacts, particularly where there is a high density of licensed premises and ready access to alcohol for consumption in public spaces.

Further data supporting the concerns around the prevalence of reported violent and sexual crime and anti-social behaviour covering the 12 months March 2025 to February 2026 in and around the CIA area has been included in Annex 1.

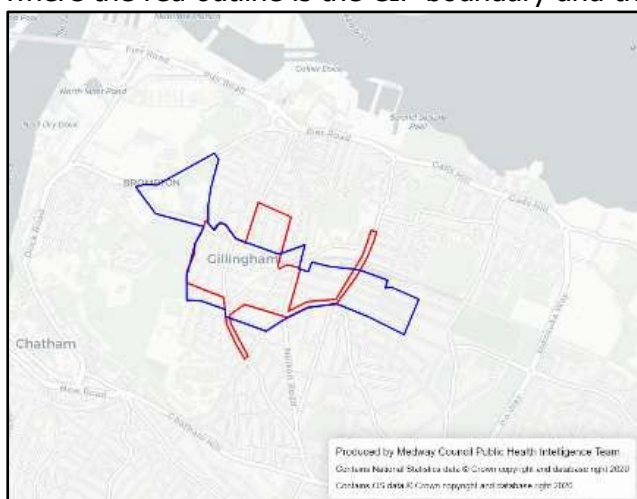
3 THE PREVENTION OF PUBLIC NUISANCE

There is a general problem in the area with street drinking, anti-social behaviour, and associated litter, with discarded cans and bottles, broken glass and evidence of public urination and defecation in alleyways and public areas.

There is a Public Space Protection Order (PSPO) in place for Gillingham town centre due, in part, to alcohol related anti-social behaviour. The blue outline shows the boundary of the PSPO in the below map.



The Gillingham CIP area is mostly within the Gillingham PSPO, as shown in the following map where the red outline is the CIP boundary and the blue outline is the PSPO boundary.



A member of public health staff has attended this area and there is ongoing evidence of alcohol related street drinking and associated litter in and around the High Street. This consists of bottles and cans of beer and cider, both 'super strength' and regular strength,

bottles of spirits and wine, and plastic and cardboard wrappings, bottle tops and other associated litter. Areas where the litter was found in particular concentrations were:

- alleyways off Balmoral Road/Duncan Road area
- Balmoral Gardens
- alleyways off Fox St
- all along both sides of Jeffery Street,
- in the flowerbeds at the junction of Jeffery Street and Victoria Street
- in the alleyways off Green St
- the alleyway between Paget St and Lock St
- the alleyway between Canterbury St and Gillingham Rd

However discarded bottles and cans can be seen everywhere thrown into the gutter, gardens and on footpaths. Examples of the type of litter in the area has been included in Annex 2.

4 SUMMARY

Gillingham High Street and the surrounding area has unacceptable levels of alcohol related issues, including crime, domestic abuse and public nuisance associated with a high density of off licences. These problems are current, ongoing, and still of concern in this area.

Policy 10 from the [Statement of Licensing Policy](#) is the most relevant to this application. This sets out the expectation of the Licensing Authority when determining applications for off licensed premises. This states that when an application is in a CIP area the Authority will refer to the Cumulative Impact Assessment (CIA), which outlines the issues in the area and the expectations for applications made for off licenced premises.

The CIA states the Authority expects an application in a CIA area to contain a full explanation as to how the premises will not adversely affect the four licensing objectives.

The application does not mention the CIA, nor does it show any understanding of the issues set out in the assessment that are particular to this area, or how the applicant intends to ensure the sale of alcohol will not add to these issues, beyond a generic list of measures which would be expected from any responsible retailer. There are no measures contained within the operating schedule which would ensure that alcohol sold from the premises will not add to the issues detailed above.

While variation to the hours is not excessive, they are still being increased by 4 hours a day in an area where the Licensing Authority has identified that alcohol related issues are unacceptable.

The Director of Public Health believes that with an increase of availability of alcohol in the CIA area it is reasonable to believe the sale of alcohol from this premises will further contribute towards the alcohol related crime, disorder, and public nuisance in this area, which are current and ongoing. The Licensing Committee is therefore asked to refuse the application.

Professor David Whiting

Director of Public Health

Date 11th May 2026

For all communication, please contact **Barbara Murray**, Public Health Project Officer at the address at the head of this representation or by the following:

Tel:

E mail:

1 ANNEX 1 – ALCOHOL RELATED CRIME AND ANTI-SOCIAL BEHAVIOUR

Certain types of crime are more associated with alcohol consumption than others. Among crimes that are regarded as being '[alcohol related](#)' are:

- Violence including wounding and assault with or without injury
- Verbal and physical abuse
- Sexual offences including abuse and assault
- Harassment
- Domestic abuse
- Public disturbance and nuisance including street drinking, noise, littering, public urination and defecation and intimidation
- Harms to children including assault, witnessing violence and all types of abuse
- Driving offences including drink driving

Research from [The Office for National Statistics](#) states that victims perceived an offender to be under the influence of alcohol in 53% of violent incidents; a proportion which has remained consistent during the last 10 years.

Research has also shown that access to off licensed premises, such as convenience shops and supermarkets, had a greater association with violent crime than premises which only allow for on-site consumption of alcohol ([Trangenstein et al \(2018\)](#)). This is particularly the case for incidents of domestic abuse where incidents often happen in the home. Alcohol consumption, and domestic abuse, increased during the COVID 19 lockdowns, where alcohol could only be purchased from off licensed premises ([Institute of Alcohol Studies, 2021](#)).

The following information concerning crime and anti-social behaviour in and near to the Cumulative Impact Policy (CIP) area has been obtained from [Police.UK](#), a publicly available website which maps crime data submitted by police services across the UK. Details on how this data is obtained and mapped can be found [here](#).

The latitude and longitude locations of the crimes indicated on the maps published on this site represent the approximate location as all reports are anonymised. However, the figures do give an indication of the types of crimes committed in each of the two wards featured, with an idea of the general location shown on the following maps.

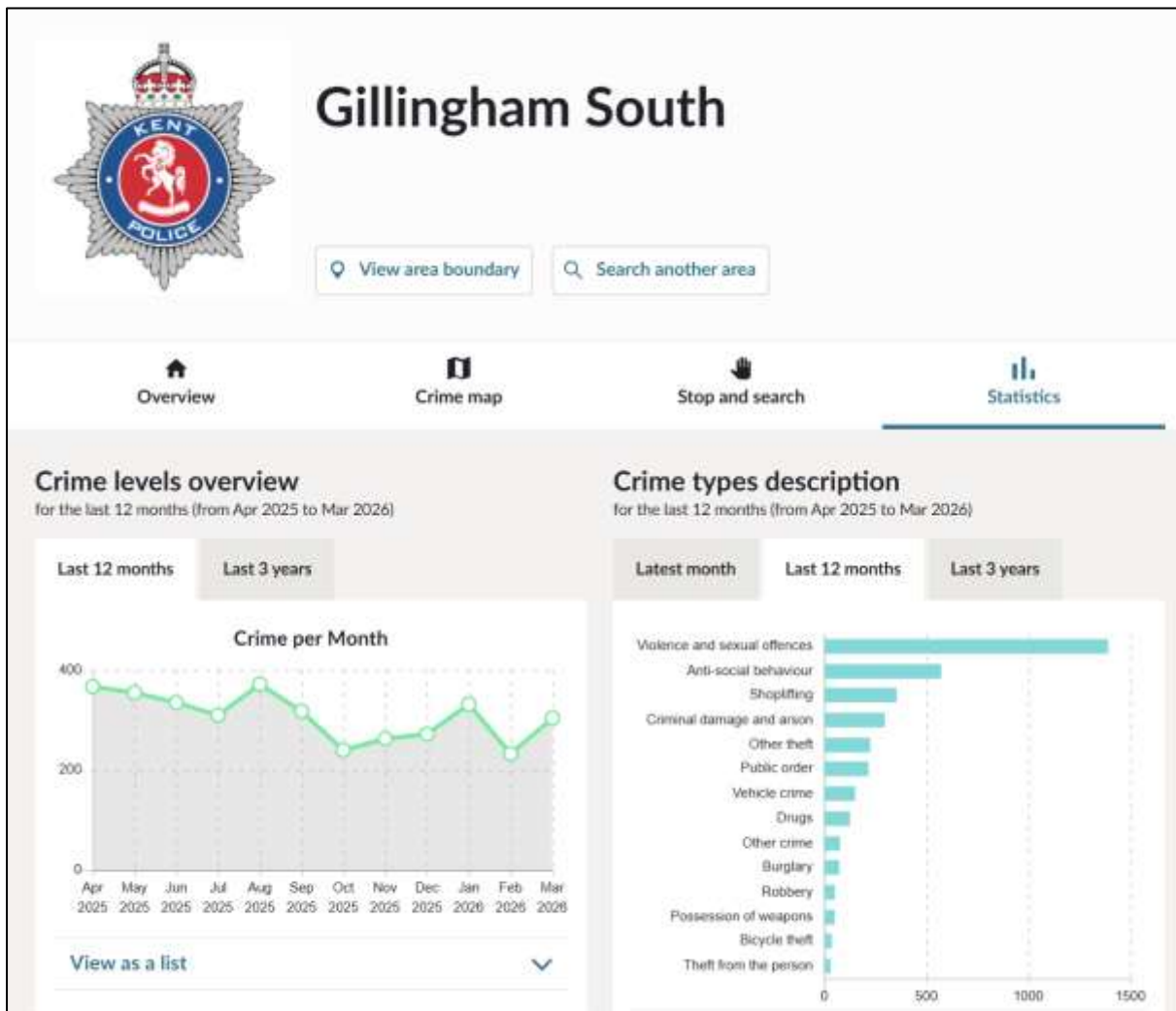
Figures for the six months – October 2025 to February 2026 – have been included to show that alcohol related crime, such as crimes of violence, sexual offences and anti-social behaviour in the two wards which cover the CIP area are still an ongoing concern.

2 GILLINGHAM SOUTH

2.1.1 Reported crimes

In Gillingham South ward between April 2025 to March 2026 there were 1395 reports of violence and sexual offences, and 576 reports of anti-social behaviour.

It can be seen from the following screen shot that these two types of reported crimes are the most common categories of reported crime in this ward, and both are associated with alcohol consumption. Other types of crimes also associated with alcohol consumption shown in the below list are criminal damage and public order offences.



2.1.2 Violence and sexual offences

The following six maps show the approximate locations and number of reported violence and sexual offences within and close to the Gillingham CIA area in Gillingham South ward between October 2025 and March 2026.



2.1.3 Anti-Social behaviour.

The following six maps show the approximate locations and number of reported anti-social behaviour incidents within and close to the Gillingham CIA area in Gillingham South ward between October 2025 and March 2026.



3 GILLINGHAM NORTH

3.1.1 Reported crimes

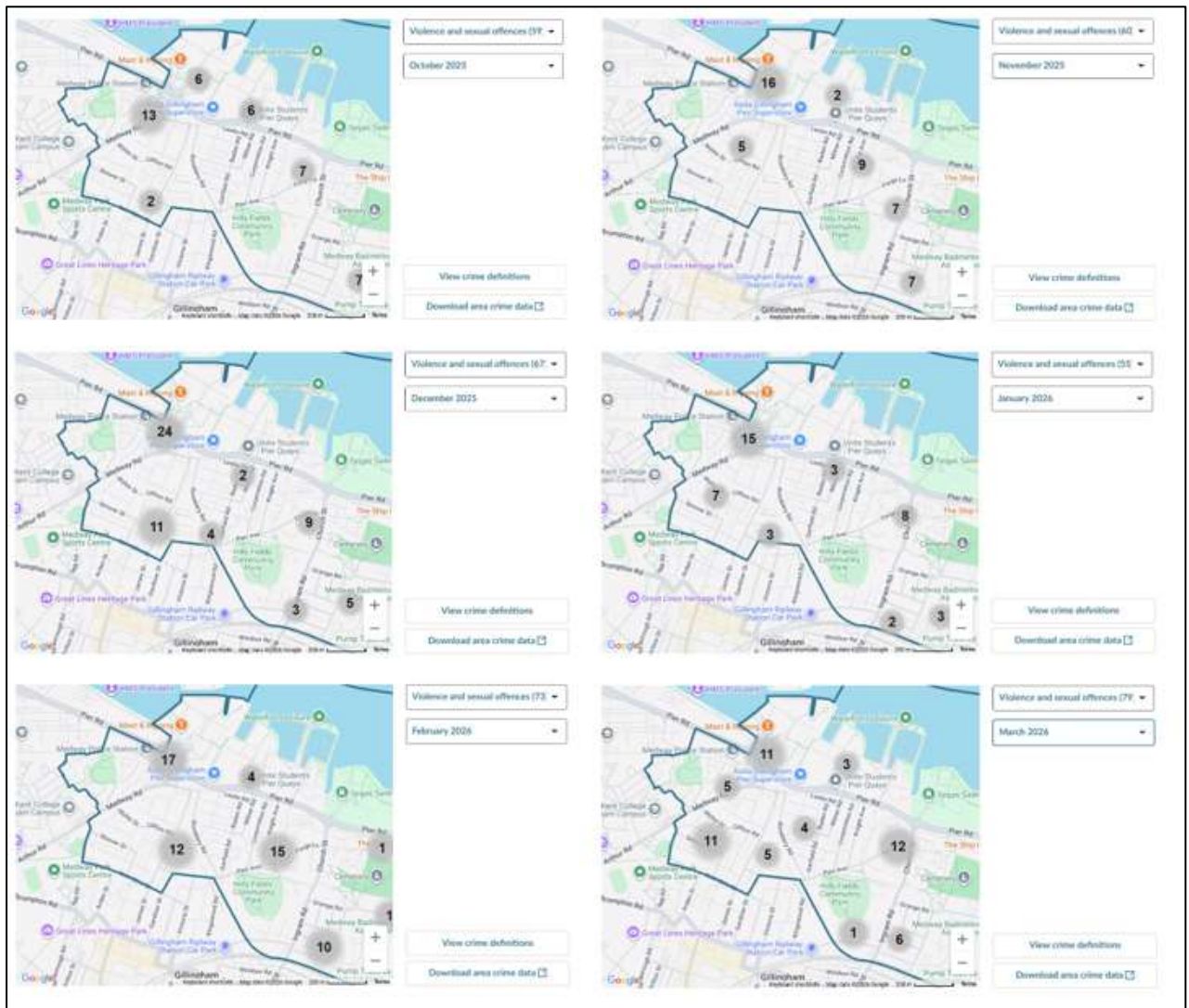
In Fort Pitt ward between April 2025 to March 2026 there were 820 reports of violence and sexual offences, and 319 reports of anti-social behaviour.

It can be seen from the following screen shot that these two types of reported crimes are the most common categories of reported crime in this ward, and both are associated with alcohol consumption. Other types of crimes also associated with alcohol consumption shown in the below list are criminal damage and public order offences.



3.1.2 Violence and sexual offences

The following six maps show the approximate locations and number of reported violence and sexual offences within and close to the Gillingham CIA area in Gillingham North ward between October 2025 and March 2026.



3.1.3 Anti-Social behaviour.

The following six maps show the approximate locations and number of reported anti-social behaviour incidents within and close to the Gillingham CIA area in Gillingham North ward between October 2025 and March 2026.



ANNEX 2 – ALCOHOL RELATED LITTER

All photographs were taken from September 2025 to April 2026

1.1 ALLEYWAYS BETWEEN HIGH ST AND FOX ST



1.2 JEFFERY ST



1.3 ALLEYWAY BETWEEN PAGET ST AND LOCK ST



1.4 ALLEYWAYS BEHIND KINGSLEY HOUSE, BALMORAL ROAD



