

From: Wilders, Debbie <deborah.wilders@gravesham.gov.uk>
Sent: 01 April 2021 16:58
To: Licensing <licensing@gravesham.gov.uk>
Cc: Environmental Protection Team <EP@gravesham.gov.uk>
Subject: FW: Variation to Premises licence for 21c King Street, Gravesend

Dear Licensing

Please find EP's representation objecting to the hours applied for the sale of alcohol attached.

Kind regards

Debbie

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Environmental Protection Team Representation 21C King Street - Application to Vary a Licence

This Service has reviewed the premises' application for 21C King Street, Gravesend, and whilst we are not objecting to the principle of the off licence in that location we are objecting to the proposed times for the sale of alcohol i.e. 08:00 to 00:00 Sunday to Thursday and 08:00 to 02:00 Friday and Saturday – due to the reasons explained below:

- This premises is unlikely to have the well regulated sale of alcohol
- Customers of the late night venues nearby are likely to pre-load, drinking the cheap alcohol quickly to have the maximum effect and will go on to the late night venues already inebriated.
- Customers are likely to buy the cheap alcohol to smuggle into the late night venues to consume rather than buy less of the more expensive alcohol in the venue
- Customers of the late night venues are likely to congregate around the off-licence meeting up to buy cheap alcohol before going to the late night venues. With the groups causing noise issues and antisocial behaviour including littering in the street. These behaviours are better prevented as they are very difficult to deal with as no council power covers this well.
- Customers are likely to go to congregate around the off-licence after they leave the late night venues in the early hours, or even between venues, causing noise and antisocial behaviour including littering.
- Customers of the off-licence are likely to create a lot of litter especially with the containers of the cheap alcohol they have purchased.

This service is very concerned that as the locality is a mixed use area with a lot of residential properties and a lot of late night venues that if the off licence is allowed to sell alcohol after the hour of 22:00 is likely to attract large numbers of people in groups or individuals who will be pre-loading with alcohol, being rowdy, littering alcohol containers etc. and carrying out other antisocial behaviour. It is therefore likely that it will not be possible to comply with the licensing objective of the prevention of public nuisance.

Additionally, this Service is concerned about the lack of information in the application as to how the premises and management will be promoting the four licensing objectives. This information is very important for this Service to understand how the premises will be managed whilst open. The provision of CCTV, having signs up about the hours they sell alcohol and recording when they refuse a sale are not sufficient to prevent anti-social behaviour causing public nuisance caused by customers of this shop after 22:00.

This service is concerned that the sale of alcohol from this premises after 22:00 on any day has the potential of causing significant noise disturbance to residents and adversely affecting their reasonable right to sleep.

Whilst the applicant has completed the table with the time that alcohol will be available each day as 08:00 it is stated in the text that the start time would be 08:30. The applicant should clarify which time is correct. This service has no objection to the sale commencing at 08:00 or 08:30 each day.

With the above in mind, we are concerned that the granting of this licence to sell alcohol outside the hours of 08:00 to 22:00 on any day would not promote the licensing object of the prevention of public nuisance due to the noise and antisocial behaviour the proposed opening hours is likely to create. We therefore request that if the licensing panel were minded to grant the applicant a variation to their licence it should only be for the hours of 08:00 to 22:00 as a maximum rather than the hours as applied for.