

# Appendix B

Representations – Objectors

## Objection 1

09/March/2017

Dear Licensing

I refer to the application for a sexual entertainment venue license by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

**This is an objection letter to the application for this license and I call for the council to refuse it.**

Although I have clearly used the template letter provided by ZERO Option (which I fully support) I do want to make it clear that the arguments made are those I would make myself. I have had a long experience of offering pastoral care to university students a majority of whom have been women. I regard it as a retrograde step for the city of Sheffield to approve of and thence offer licenses to such establishments. The city's desire to build a city founded on fairness as social justice, (cf Fair City campaign; Sheffield Fairness Commission) demands that there is equality between the genders and that women and men are not subject to the current objectification of their bodies as currently persists within Sheffield and sadly elsewhere. These clubs are not 'a bit of fun' they are harmful to the individuals that attend them, to those who work within them, and to the image of the city to our many visitors.

I believe that the Council should **refuse** the license application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fear about the presence of Spearmint Rhino in previous objections.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'*[1]

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'*[2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'*[3]

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are

people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

### **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor".

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

### **Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'*<sup>[4]</sup>

The case of *Thompson v Oxford City Council* (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

Best wishes,

<sup>[1]</sup> Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

<sup>[2]</sup> Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in *Criminal Justice Matters*, 88:1, 10-12.

<sup>[3]</sup> Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

<sup>[4]</sup> (p. 90)

## Objection 2

**March 9th 2017**

Dear Licensing

I refer to the application for a sexual entertainment venue license by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

**This is an objection letter to the application for this license and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'*[1]

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'*[2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.*<sup>[3]</sup>

## **Location**

In its current policy, the Council states:

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### **a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

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The Club is also in the centre of the newly designated "knowledge corridor".

### **b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

### **c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

### **d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

### **e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

### **f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

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The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

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It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'*<sup>[4]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

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[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in *Criminal Justice Matters*, 88:1, 10-12.

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[4] (p. 90)

### Objection 3

Dear Sir or Madam

**I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.**

**This is an objection to the application for this licence and I call for the council to refuse it.**

I work as a lecturer at Sheffield Hallam University and often attend events in The Hubs, our Student Union building. I know that a number of our students feel uncomfortable about the presence of Spearmint Rhino so close to the student union.

They (and I) also feel unhappy about the way in which Spearmint Rhino attempts to promote itself as part of the normal, mainstream night-life of Sheffield. Spearmint Rhino has two weekly 'Student Nights': free entry with an NUS card, discounted drinks and 'dances'. In this way Spearmint Rhino seeks to affiliate and integrate itself with Sheffield Hallam University, even though the university's policies on Gender Equality and the NUS's stand on the harmful effects of university 'lad culture' run completely counter to the ethos of such an establishment.

I, and it seems a growing number of students, feel that the normalisation and mainstream promotion of such venues is very harmful to women. These venues promote a dehumanised view of women, sending out the message that women's bodies are for male consumption. **In the context of a society in which there is widespread violence against women, and in the light of the NUS research findings regarding 'lad culture' in universities\***, I think this is something Sheffield Council should be taking very seriously.

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

#### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

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'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'[1]



Kolvin continues with:

'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'[2].

This is further corroborated by 2012 research published in Criminal Justice Matters which states that:

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## **Location**

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The Club is also in the centre of the newly designated "knowledge corridor".

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There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

c) a church or other place of religious worship;

Christ Church Central operates from the Workstation and runs a weekly service.

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There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

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f) a central gateway to the city or other city landmark, historic building or tourist attraction.

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

### **Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

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[4] (p. 90)

## **Objection 4**

12<sup>th</sup> March 2017

Dear Licensing

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**This is an objection letter to the application for this licence and I call for the council to refuse it.**

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The Club is also in the centre of the newly designated “knowledge corridor”.

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## Additional grounds for refusal

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<sup>[4]</sup> (p. 90)

## **Objection 5**

13 March 2017

Dear Licensing

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There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated “knowledge corridor”.

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club’s presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children’s media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

### **Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council’s equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can “take a fresh look” despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*‘Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.’*<sup>[4]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could “take a fresh look” at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) ‘License to cause harm? Sex entertainment venues and women’s sense of safety in inner city centres’ in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] (p. 90)



## **Objection 6**

**13 March 2017**

Dear Sir Or Madam

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

**This is an objection letter to the application for this licence and I call for the council to refuse it.**

I am of the opinion that there are a number of reasons why the Spearmint Rhino Club should not be given a license renewal.

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'*[1]

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'*[2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'*[3]

## **Location**

In its current policy, the Council states:

*“Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated “knowledge corridor”.

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club’s presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children’s media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

## **Additional grounds for refusal**

In my opinion, in the 21st century, there is no place for sexual entertainment venues. Women should not be viewed at something to be bought and sold.

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council’s equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a

licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can “take a fresh look” despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*‘Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.’*<sup>[4]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could “take a fresh look” at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

Please send me an acknowledgement of receipt of this email.

I look forward to hearing from you.

#### REFERENCES:-

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) ‘License to cause harm? Sex entertainment venues and women’s sense of safety in inner city centres’ in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] (p. 90)

## Objection 7

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

This is an objection letter to the application for this licence and I call for the council to refuse it.

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### The Public Sector Equality Duty and Gender Equality

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's Gender and Spatial Planning Good Practice Note:

'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'[1]

Kolvin continues with:

'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'[2].

This is further corroborated by 2012 research published in Criminal Justice Matters which states that:

'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'[3]

### Location

In its current policy, the Council states:

"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-

a) a school, nursery or other premises substantially used by or for children under 16 years of age;  
There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor".

b) a park or other recreational area used by or for children under 16 years of age;  
There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

c) a church or other place of religious worship,

Christ Church Central operates from the Workstation and runs a weekly service.

d) a Hospital, Mental Incapacity or Disability Centre or similar premises;

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or

f) a central gateway to the city or other city landmark, historic building or tourist attraction.

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

#### Additional grounds for refusal

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'<sup>[4]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

[1] Kolvin, P (2010) Sex Licensing, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in Criminal Justice Matters, 88:1, 10-12.

[3] Kolvin, P (2010) Sex Licensing, The Institute of Licensing p.87

[4] (p. 90)

## Objection 8

13 March, 2017

Dear Licensing,

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

This is an objection letter to the application for this licence and I call for the council to refuse it.

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

The Public Sector Equality Duty and Gender Equality

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's Gender and Spatial Planning Good Practice Note:

'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'[1]

Kolvin continues with:

'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'[2].

This is further corroborated by 2012 research published in Criminal Justice Matters which states that:

'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'[3]

Location

In its current policy, the Council states:

"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-

a) a school, nursery or other premises substantially used by or for children under 16 years of age; There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor".

b) a park or other recreational area used by or for children under 16 years of age; There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

c) a church or other place of religious worship;

Christ Church Central operates from the Workstation and runs a weekly service.

d) a Hospital, Mental Incapacity or Disability Centre or similar premises;

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or

f) a central gateway to the city or other city landmark, historic building or tourist attraction.

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

Additional grounds for refusal

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

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It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'<sup>[4]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

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[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in Criminal Justice Matters, 88:1, 10-12.

## **Objection 9**

13-3-17

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

**This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

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*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'*[1]

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'*[2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'*[3]

### **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

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There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor".

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The



Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

**Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

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The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

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It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'*<sup>[4]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

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[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] (p. 90)

## Objection 10

14.03.17

Dear Licensing Service

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

This is an objection letter to the application for this licence and I call for the council to refuse it.

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### The Public Sector Equality Duty and Gender Equality

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's Gender and Spatial Planning Good Practice Note:

'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'[1]

Kolvin continues with:

'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'[2].

This is further corroborated by 2012 research published in Criminal Justice Matters which states that:

'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'[3]

## Location

In its current policy, the Council states:

“Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-

a) a school, nursery or other premises substantially used by or for children under 16 years of age;

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated “knowledge corridor”.

b) a park or other recreational area used by or for children under 16 years of age;

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

c) a church or other place of religious worship;

Christ Church Central operates from the Workstation and runs a weekly service.

d) a Hospital, Mental Incapacity or Disability Centre or similar premises;

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or

f) a central gateway to the city or other city landmark, historic building or tourist attraction.

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

## Additional grounds for refusal

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'<sup>[4]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

## Objection 11

14/03/2017

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

This is an objection letter to the application for this licence and I call for the council to refuse it.

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### The Public Sector Equality Duty and Gender Equality

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality.

This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas –

subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's Gender and Spatial Planning Good Practice Note:

'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'[1]

Kolvin continues with:

'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men.

Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'[2].

This is further corroborated by 2012 research published in Criminal Justice Matters which states that:

'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'[3]

## Location

In its current policy, the Council states:

"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-

a) a school, nursery or other premises substantially used by or for children under 16 years of age;

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

When the Club was first licensed, UTC - a college for 14 to 19 year-olds - had not been built.

The Club is also in the centre of the newly designated "knowledge corridor".

b) a park or other recreational area used by or for children under 16 years of age;

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

c) a church or other place of religious worship;

Christ Church Central operates from the Workstation and runs a weekly service.

d) a Hospital, Mental Incapacity or Disability Centre or similar premises;

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or

f) a central gateway to the city or other city landmark, historic building or tourist attraction.

It is directly opposite the Showroom cinema which hosts family events.

It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

## Additional grounds for refusal

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of

women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can “take a fresh look” despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

‘Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.’[4]

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could “take a fresh look” at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

[1] Kolvin, P (2010) Sex Licensing, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) ‘License to cause harm? Sex entertainment venues and women’s sense of safety in inner city centres’ in Criminal Justice Matters, 88:1, 10-12.

[3] Kolvin, P (2010) Sex Licensing, The Institute of Licensing p.87

[4] p. 90

## Objection 12

Sent: 14 March 2017 22:17

To: licensingservice

Subject: renewal of license of Spearmint Rhino

I have recently given up my studio at Yorkshire Artspace. One of the contributing factors was the presence of Spearmint Rhino opposite the Studios, Leaving the studio in the evening means running the gauntlet of men hanging around outside the club harassing women who are passing the club. These include the bouncers from the club. The area is not residential so often the only people around the club and the studios are men going to and from the club. This makes the area feel unsafe for women coming and going in the area to and from the studios. The area is testosterone filled and unpleasant for women to move around in. There were often broken bottles on the street left by men leaving the club. These were never cleaned up by the club. The area is meant to be an arts quarter and the presence of Spearmint Rhino degrades the arts and makes it unsafe for women like myself.



## **Objection 13**

15/03/2017

Dear Licensing

I refer to the application for a sexual entertainment venue license by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

### **This is an objection letter to the application for this license and I call for the council to refuse it.**

I believe that the Council should refuse the license application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

#### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'*[1]

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'*[2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'* [3]

#### **Location**

In its current policy, the Council states:

*“Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated “knowledge corridor”.

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club’s presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organizations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organizations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children’s media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

**Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council’s equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a license would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

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*'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'*[4]

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could “take a fresh look” at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

## **Objection 14**

Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD

**15<sup>th</sup> March 2017**

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

**This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

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Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'*[2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'*[3]

### **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor".

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential

addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

### **Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

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It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'*[4]

The case of *Thompson v Oxford City Council* (2014) was also supported at court of appeal, and the Council told they could “take a fresh look” at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

Regards

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) ‘License to cause harm? Sex entertainment venues and women’s sense of safety in inner city centres’ in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] p. 90

## Objection 15

Date – Monday 13<sup>th</sup> March 2017

**Miss Louise Haigh MP,  
Member of Parliament for Sheffield Heeley,  
63/65 Chesterfield Road,  
Heeley,  
Sheffield,  
S8 0RL.**



**Reference –**

Closure of Spearmint Rhino Brown Street, Sheffield

Dear Miss Haigh,

I am writing as I would like to voice my opinion about the upcoming renewal of the Spearmint Rhino licence.

I would like to see this disgusting business removed from our city, for me this kind of thing really makes our city stand out for all the wrong reasons.

I truly believe that in 2017 this kind of business would have been finished with years ago, it is a disgraceful way to be earning money. It says it is a gentlemen's club but any real gentleman wouldn't go to some place like this I wouldn't.

This kind of business, really needs closing down I want Sheffield to be a welcoming city for women not the kind where we have a place where men go and watch strippers because that is what they are strippers not dancers.

As a man I feel horrible that women might just think that all men are ones that watch strippers and go to brothels, because me I found this whole business dirty

I want women to have great lives where they are treated with respect and can have great careers and lives like you Miss Haigh, you should be a shining example of what a women should want to be in life.

For me this is no kind of life really, please help these young women escape this life because I don't think all of them want to be doing this.

This kind of business is not what we want in this city, I know you can't stop everything Miss Haigh that happens in our city but please try to put pressure on the council to stop this business being in our city.

Yours sincerely –



## Objection 16

# Sheffield Hallam University

16<sup>th</sup> March 2017

Chief Licensing Officer  
Licensing Services  
Sheffield City Council  
Block C,  
Staniforth Road  
Sheffield  
S9 3HD

**Re: Spearmint Rhino, 60 Brown Street, Sheffield, S1 2BS - Application under Part II and Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982 - Sexual Entertainment Venue License**

We, Sheffield Hallam University, wish to object to the above application for the reasons outlined below.

Section 7 of Sheffield City Council's Sexual Entertainment Venue Licensing Policy states that The Council may refuse the grant or renewal of the license if it would be inappropriate, having regard to the character of the relevant locality, and that the Council acknowledges that licensed premises (sexual entertainment venues) "*can result in a potential fear of crime, anti social behaviour, noise pollution and other disturbance to residents*".

The route past Spearmint Rhino is a very high traffic area for students with an abundance of student accommodation nearby and a new development for student accommodation situated immediately adjacent; the route for students to Sheffield Hallam takes them directly past the venue during normal working hours and around the clock, due to Sheffield Hallam University's Learning Centre opening hours 24/7 and teaching hours up to 9pm. There is also concern that our students are entitled to and need to feel safe and secure during their studies at Sheffield Hallam and that a venue such as Spearmint Rhino will undermine the perception of safety that the City and the University has spent considerable resources to ensure. The current existence of the venue portrays the area in an anti-social light not conducive with its setting in the Cultural Industries Quarter, with fear and perception of crime being induced in some people who use the area including walking past the venue.

The Policy states that the council will not license premises that it feels are in close proximity to: -

- a) a school, nursery or other premises substantially used by or for children under 16 years of age;
- b) a park or other recreational area used by or for children under 16 years of age;
- c) a church or other place of religious worship;
- d) a Hospital, Mental Incapacity or Disability Centre or similar premises;

- e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or
- f) a central gateway to the city or other city landmark, historic building or tourist attraction.

The presence of a striptease club in the heart of the Cultural Industries Quarter is inappropriate, with the focus of the area being arts, media and education mixed with industrial heritage. Sheffield train station and the main transport interchange is just a moment's walk from the venue providing a main gate way to and from the city centre and we feel that having Spearmint Rhino in such a location gives a negative impression of Sheffield and Sheffield Hallam University.

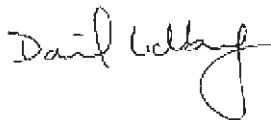
The strip club is also directly adjacent to the Quarters' only designated Public Space which is probably not used to its full potential, likely to be down to the fact that it is next to a strip club. It is also directly opposite Sheffield Hallam University's Students Union which is a Social and Cultural Hub as well as providing advice and services including counselling, equality, disability, legal and personal issues.

According to Sheffield City Councils' Urban Design Statement, the venue is surrounded by significant buildings of character, is within a Character Area and is adjacent to a Landmark (SHU Students Union).

Sheffield City Council states that its vision for the Cultural Industries Quarter is 'to develop its growing reputation as a thriving cultural enclave and will help to establish Sheffield as a regionally and nationally significant centre for knowledge and creativity' and that 'mixing of uses within the Quarter could offer a diverse range of activity. These uses would complement each other and not inhibit the development of the Quarter as a vibrant cultural destination'. We feel that Spearmint Rhino does not complement any of these attributes and in fact works in total opposition to above statements and is in no way cultural, artistic or educational.

The venue is not in close proximity to a church or places of worship, however a large number of students studying at Sheffield Hallam University are religious and regularly visit our Prayer Rooms and Multi-faith Chaplaincy located off Pond Street. They must walk past Spearmint Rhino to get there. It is likely that a venue such as this may cause offence to such students.

Sheffield Hallam University also has various Cultural and social hubs nearby including Cafes on Arundel Street and an art gallery in the Cantor Building. Other gallery spaces are often used by Sheffield Hallam including several venues on Brown Street and Paternoster Row.



Daniel Ladbury  
Director of Estates

## Objection 17

Dear Licensing,

I am emailing about the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS. This is an objection letter to the application for this licence and I call for the council to refuse it. I live in Sheffield, and travel to Nottingham each day by train; I therefore frequently walk past the current venue.

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

### **Location**

In its current policy, the Council states:

"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-

a) a school, nursery or other premises substantially used by or for children under 16 years of age;

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor".

b) a park or other recreational area used by or for children under 16 years of age;

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

c) a church or other place of religious worship;

Christ Church Central operates from the Workstation and runs a weekly service.

d) a Hospital, Mental Incapacity or Disability Centre or similar premises;

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or

f) a central gateway to the city or other city landmark, historic building or tourist attraction.

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students' Union and directly backs onto student accommodation.

#### **Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I look forward to hearing from you.

Yours,

## Objection 18

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

### **This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

#### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'* [1]

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'* [2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'*

#### **Location**

In its current policy, the Council states:

*“Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated “knowledge corridor”.

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club’s presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

The area which the club is in is marketed by the Council as the "Cultural Quarter" - it is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children’s media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

**Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council’s equality policies and its equality duty. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city.

A sexual entertainment venue in the heart of the city is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can “take a fresh look” despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*‘Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.’*<sup>[1]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could “take a fresh look” at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) ‘License to cause harm? Sex entertainment venues and women’s sense of safety in inner city centres’ in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] p. 90

## Objection 19

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

### **This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

#### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'*[1]

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'*[2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'*



In its current policy, the Council states:

*“Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated “knowledge corridor”.

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club’s presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

The area which the club is in is marketed by the Council as the "Cultural Quarter" - It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children’s media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

**Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council’s equality policies and its equality duty. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equality issues within the council and the city.

A sexual entertainment venue in the heart of the city is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

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It was held that a council can “take a fresh look” despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*‘Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.’*[4]

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could “take a fresh look” at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

## Objection 20

Dear Licensing,

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

**This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'*[1]

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'*[2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'*[3]

### **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated “knowledge corridor”.

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

The area which the club is in is marketed by the Council as the "Cultural Quarter" - it is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

**Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies and its equality duty. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city.

A sexual entertainment venue in the heart of the city is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can “take a fresh look” despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*‘Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.’<sup>[4]</sup>*

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could “take a fresh look” at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

Yours Faithfully,

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] p. 90

## Objection 21

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

### **This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

#### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

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*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'*[2].

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#### **Location**

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The Club is also in the centre of the newly designated "knowledge corridor".

#### **b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

#### **c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

The area which the club is in is marketed by the Council as the "Cultural Quarter" - it is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

**Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies and its equality duty. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city.

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I look forward to hearing from you.

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] p. 90

## Objection 22

Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD

17th March 2017

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

This is an objection letter to the application for this licence and I call for the council to refuse it.

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### The Public Sector Equality Duty and Gender Equality

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's Gender and Spatial Planning Good Practice Note:

'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'[1]

Kolvin continues with:

'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'[2].



This is further corroborated by 2012 research published in Criminal Justice Matters which states that:

'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'[3]

#### Location

In its current policy, the Council states:

"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-

a) a school, nursery or other premises substantially used by or for children under 16 years of age;

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor".

b) a park or other recreational area used by or for children under 16 years of age;

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

c) a church or other place of religious worship;

Christ Church Central operates from the Workstation and runs a weekly service.

d) a Hospital, Mental Incapacity or Disability Centre or similar premises;

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or

f) a central gateway to the city or other city landmark, historic building or tourist attraction.

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

#### Additional grounds for refusal

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the

impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

Furthermore, as an individual and also as a part of the survivor community, I object to this as it directly exploits women and leaves rape and sexual abuse survivors like myself feeling further victimised. This establishment clearly paints women in a certain light, a light that encourages the abuse and rape of women. As clearly stated above, many women avoid areas with these kinds of establishments due to a lack of safety around the men that frequent these establishments, there's a clear link between the consumption of pornography and strippers and sexualising women's bodies and the abuse and rape of women. To make all women, especially those that have already survived rape and abuse, it is imperative to not fill our town with these kinds of establishments. The safety and comfort of women and our right to not feel like pieces of meat is just as, if not more important than a man's right to sexualise and profit off of our bodies.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'<sup>[4]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

[1] Kolvin, P (2010) Sex Licensing, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in Criminal Justice Matters, 88:1, 10-12.

[3] Kolvin, P (2010) Sex Licensing, The Institute of Licensing p.87

[4] p. 90

## Objection 23

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

### **This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

#### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'* [1]

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'* [2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'* [3]

#### **Location**

In its current policy, the Council states:

*“Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated “knowledge corridor”.

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club’s presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

The area which the club is in is marketed by the Council as the "Cultural Quarter" - it is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children’s media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

**Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council’s equality policies and its equality duty. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city.

A sexual entertainment venue in the heart of the city is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

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*‘Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.’*<sup>[1]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could “take a fresh look” at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) ‘License to cause harm? Sex entertainment venues and women’s sense of safety in inner city centres’ in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] p. 90

## Objection 24

Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

**This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*: page 86

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable' \_\_\_\_*

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage' \_\_\_\_.*

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.' \_\_\_\_*

## **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor".

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

**Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.



I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can “take a fresh look” despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*‘Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.’* \_\_\_

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could “take a fresh look” at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

\_\_\_ Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

\_\_\_ Patiniotis, J. & Standing, K. (2012) ‘License to cause harm? Sex entertainment venues and women’s sense of safety in inner city centres’ in *Criminal Justice Matters*, 88:1, 10-12.

\_\_\_ Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

\_\_\_ p. 90



Sheffield City Council  
Licensing Section  
Block C, Staniforth Road Depot  
Staniforth Road  
Sheffield  
S9 3HD

Date: 17<sup>th</sup> March 2017

To whomever it may concern,

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

**This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of Sheffield City Council's Sexual Entertainment Venues Licensing Policy on two grounds:

Ground c):

"the number of sex establishments in the relevant locality at the time the application is made is equal to or exceeds the number which the authority consider is appropriate for that locality."

The grounds go on to state that "Nil may be an appropriate number for the purposes of (c)"

Ground d):

"the grant or renewal of a licence would be inappropriate, having regard -

(i) to the character of the relevant locality; or

(ii) to the use to which any premises in the vicinity are put; or

(iii) to the layout, character or condition of the premises; vehicle; vessel or stall in respect of which the application is made."

Sheffield City Council also has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society.

Furthermore Schedule 3 1982 Act provides specific grounds to refuse/renew license:

e) "cultural hub of city"

f) "central gateway to the city...or tourist attraction"

Our general terms of objection are as follows:

- the part of the city that the club is situated is unsuitable due to it being in the "cultural heart" of the city. The Sexual Entertainment Venue is situated in the cultural heart of Sheffield, and within the area of the railway station, the main gateway and welcome point to the city, encompassing the pedestrianised walk way up to town centre.

- the club is situated directly next to the Hallam Students Union, a hub of young impressionable people, sometimes vulnerable and often away from home for the first time.

- the club is situated in close proximity to the Workstation, a conference facility that hosts events such as the Children's Media Conference, Sheffield Documentary Festival.

- the club is situated in close proximity to The Showroom, an independent cinema that promotes 'Young Cinema', a programme that encourages children and young adults to engage in film, and 'Kickstart', a programme for children with autism and their families.

- the club is situated in close proximity to a number of organisations which support vulnerable children and adults

The Workstation - 15 Paternoster Row - Sheffield - S1 2BX  
0114 220 1426 - info@cmso.co.uk - www.cmso.co.uk

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- when walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city.

- the Council's own promotion of the city is "Sheffield - where everyone matters" - this includes the female citizens of the city who should not be subjected to their city promoting and normalising the sexualisation and objectification of them

- this image or a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies and Sheffield's own widely publicised belief of Sheffield being a city "where everyone matters."

- granting a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city,

- the council has a duty under the Equality Act to work to eliminate unlawful discrimination, harassment and victimisation

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I also ask what actions or discussions the council has taken in order to consider what number of sexual entertainment venues is appropriate for Sheffield, as stated in the policy and legislation? Has the Council for example, as per their own policy, carried out an Equality Impact Assessment?

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

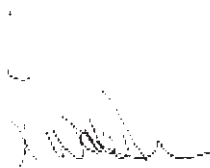
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It was held that a council can "take a fresh look" despite no changes to the character of locality.

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.



Zoe Walton  
Finance Manager  
Community Media Solutions

## Objection 26

Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD

17/03/2017

Dear Licensing,

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

**This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'*<sup>[1]</sup>

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'*<sup>[2]</sup>.

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'*<sup>[3]</sup>

### **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor".

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc. There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

**Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

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I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'*<sup>[4]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.  
I look forward to hearing from you.

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4]

## Objection 27

Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD

Friday 17<sup>th</sup> March

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield S1 2BS.

**This is an objection letter to the application for this licence and I call for the Sheffield City Council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for Sexual Entertainment Venues (SEVs) to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to modify their behaviour because of Spearmint Rhino being there: for example, having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable' [1]*

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'[2].*

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*‘ . . . the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club. [3]*

### **Location**

In its current policy, the Council states:

*“Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated “knowledge corridor”.

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club’s presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows the organisations involved.

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

It is directly opposite the Showroom Cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the Children’s Media Conference; Off the Shelf, ShAFF, and so on.

Furthermore, there is a large young student presence in the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.



This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women.

Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the Council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the Council says it stands for, everything that the Council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the Council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

#### **R (Bean Trading A Ltd) v Leeds City Council (2014)**

It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the licence.'*<sup>[4]</sup>

The case of **Thompson v Oxford City Council (2014)** was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] p. 90

## Objection 28

20 March 2017

Dear Licensing,

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

### **This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

#### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'* | |

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'* | |

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

‘... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.’[3]

### **Location**

In its current policy, the Council states:

*“Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated “knowledge corridor”.

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club’s presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

The area which the club is in is marketed by the Council as the "Cultural Quarter" - it is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children’s media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

### **Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the

impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies and its equality duty. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city.

A sexual entertainment venue in the heart of the city is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'*<sup>[1]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] p. 90

## Objection 29

Sheffield City Council  
Licensing Section  
Block C, Staniforth Road Depot  
Staniforth Road  
Sheffield  
S9 3HD  
2017

19 March

Dear Licensing Service

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

**This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing clubs make women feel threatened or uncomfortable'*<sup>[1]</sup>

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of*

men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'[2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'* [3]

### **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor".

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

The area which the club is in is marketed by the Council as the "Cultural Quarter" - it is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

### **Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies and its equality duty. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city.

A sexual entertainment venue in the heart of the city is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'*<sup>[4]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

**Yours faithfully,**

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] p. 90

## Objection 30

Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD

**19.03.2017**

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

### **This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

#### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:



*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'[1]*

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'[2].*

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'[3]*

## **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

### **a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge gateway".

### **b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (formerly known as Festival Square but now named as Cultural Industries Quarter Square on the map of the area which can be found on Sheaf Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

**Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

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*‘Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.’*[4]

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could “take a fresh look” at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) ‘License to cause harm? Sex entertainment venues and women’s sense of safety in inner city centres’ in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] p. 90

## Objection 31

Dear Licensing

I am writing to you in reference to the application for a sexual entertainment licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

I am writing in objection to the application for this licence, and I call on the council to refuse it under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy.

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

I personally work at Sheffield Hallam University and was appalled upon starting at the University to see an SEV in such close proximity to a University, and in particular to the Students Union building where women are encouraged to walk in this area late at night. I have on occasion needed to walk past Spearmint Rhino during its opening hours and have felt very uncomfortable and nervous for my personal safety around this venue.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'.*

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs. The Club is also in the centre of the newly designated "knowledge corridor".

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

The area which the club is in is marketed by the Council as the "Cultural Quarter" - it is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies and its equality duty. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city.

A sexual entertainment venue in the heart of the city is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

## Objection 32

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

**This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'*[1]

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'*[2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*‘ . . . the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club. ’[3]*

### **Location**

In its current policy, the Council states:

*“Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated “knowledge corridor”.

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club’s presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

The area which the club is in is marketed by the Council as the “Cultural Quarter” - it is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children’s media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

### **Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies and its equality duty. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city.

A sexual entertainment venue in the heart of the city is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'*[4]

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] p. 90



Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD

**19<sup>th</sup> March 2017**

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

**This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

**The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable' \_\_\_*

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage' \_\_\_.*

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*' . . . the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.' \_\_\_*

### **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge gateway".

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (formerly known as Festival Square but now named as Cultural Industries Quarter Square on the map of the area which can be found on Sheaf Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

**Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it

stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can “take a fresh look” despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*‘Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.’* \_\_\_

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could “take a fresh look” at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

\_\_\_ Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

\_\_\_ Patiniotis, J. & Standing, K. (2012) ‘License to cause harm? Sex entertainment venues and women’s sense of safety in inner city centres’ in *Criminal Justice Matters*, 88:1, 10-12.

\_\_\_ Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

\_\_\_ p. 90

## Objection 34

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

**This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has “statutory obligations in relation to disability race and gender” ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

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*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'* [!]

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'* [2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'* [3]

## **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor".

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

The area which the club is in is marketed by the Council as the "Cultural Quarter" - it is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

### **Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies and its equality duty. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city.

A sexual entertainment venue in the heart of the city is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

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It was held that a council can “take a fresh look” despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*‘Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.’*[4]

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could “take a fresh look” at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

**Insert name and address**

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) ‘License to cause harm? Sex entertainment venues and women’s sense of safety in inner city centres’ in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] p. 90



## Objection 35

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

### **This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

#### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

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Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'[2].*

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.<sup>[3]</sup>

## **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

***As a school teacher, I sometimes bring parties of under 16s to the Showroom Cinema. I am unhappy for my students to have to walk near to Spearmint Rhino.***

The Club is also in the centre of the newly designated "knowledge corridor".

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

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There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

### **Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies and its equality duty. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city.

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The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in *Criminal Justice Matters*, 88:1, 10-12.[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] p. 90

## Objection 36

Dear Sir/Madam

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS. **This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

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*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'*[1]

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'*[2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'*[3]

### **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;** There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs. The Club is also in the centre of the newly designated “knowledge corridor”.

**b) a park or other recreational area used by or for children under 16 years of age;** There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club’s presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;** Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, I am aware that the Council knows which organisations are being referring to.

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or  
f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

The area which the club is in is marketed by the Council as the "Cultural Quarter" - it is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children’s media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

#### **Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council’s equality policies and its equality duty. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city.

A sexual entertainment venue in the heart of the city is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal. The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014). It was held that a council can “take a fresh look” despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*‘Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.’*[4]

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could “take a fresh look” at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

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[2] Patiniotis, J. & Standing, K. (2012) ‘License to cause harm? Sex entertainment venues and women’s sense of safety in inner city centres’ in *Criminal Justice Matters*, 88:1, 10-12.

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[4] p. 90

## Objection 37

Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD

16<sup>th</sup> March 2017

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

**This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'* [1]

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations*

*ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'* [2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'* [3]

### **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor".

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.



## Additional grounds for refusal

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

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## Objection 38

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield, S1 2BS.

**This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

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The area which the club is in is marketed by the Council as the "Cultural Quarter" - it is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

**Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies and its equality duty. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city.

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## Objection 39

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**This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

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The Club is also in the centre of the newly designated "knowledge corridor".

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**Additional grounds for refusal**

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## Objection 40

Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD

17<sup>th</sup> March 2017

Dear Licensing

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## Additional grounds for refusal

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A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

As well as the statutory reasons listed above I object to the proposal as a business owner in the city. I run a high end consulting business from the workstation. We attract and work with clients in all sectors from all around the world. We chose the workstation as a vibrant, entrepreneurial office space which showcases the best of Sheffield creativity. The area around us is full of inspiring businesses and amenities that help us entertain our clients in a pleasing urban

environment. We work hard to promote Sheffield as a destination to our clients and to position ourselves alongside competitors based in London, Lisbon, Copenhagen and other world cities. The presence of the SEV opposite the workstation has a highly adverse impact on our ability to present Sheffield in this way. We have received numerous comments from male and female clients about how its presence in the area detracts from the amenity value provided by the Site Gallery, SHU, The Showroom, Tamper etc etc.

I also object to the proposals as a father. My daughter is a citizen of this city. It is important to me that she can move around the city safely and as an equal to any other citizen. I like bringing her into my office to be part of the company I run. I like walking up the hill to Tamper to have a coffee with her. She likes running around in the park area outside the SHU building. I don't like the fact that she has to do so outside a building which exploits and objectifies her gender. Sheffield is better than that. Or it should be.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

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## Objection 41

Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD  
17th March 2017

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

This is an objection letter to the application for this licence and I call for the council to refuse it.

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### The Public Sector Equality Duty and Gender Equality

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's Gender and Spatial Planning Good Practice Note:

'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'[1]

Kolvin continues with:

'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'[2].

This is further corroborated by 2012 research published in Criminal Justice Matters which states that:

' . . . the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'[3]

Location

In its current policy, the Council states:

"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor".

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

It is also in close proximity to bus stop number 37026712 (SS2 Paternoster Row/Sheffield Station) served by numerous inbound bus services dropping off passengers continuing journeys from Sheffield Station, a central gateway to the city. The same is also used to pick up passengers on bus route 95 towards Walkley.

### **Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'<sup>[4]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

[1] Kolvin, P (2010) Sex Licensing, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in Criminal Justice Matters, 88:1, 10-12.

[3] Kolvin, P (2010) Sex Licensing, The Institute of Licensing p.87

[4] p. 90

## Objection 42

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

### **This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

#### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

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*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'*[1]

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'*[2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'*[3]

#### **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor".

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

The area which the club is in is marketed by the Council as the "Cultural Quarter" - it is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

**Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies and its equality duty. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city.

A sexual entertainment venue in the heart of the city is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

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It was held that a council can “take a fresh look” despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*‘Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.’*[4]

The case of *Thompson v Oxford City Council* (2014) was also supported at court of appeal, and the Council told they could “take a fresh look” at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) ‘License to cause harm? Sex entertainment venues and women’s sense of safety in inner city centres’ in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] p. 90

## Objection 43

Sheffield City Council  
Licensing Section  
Block C, Staniforth Road Depot  
Staniforth Road  
Sheffield  
S9 3HD

**DEAD  
EARNEST**

Date: 17<sup>th</sup> March 2017

To whomsoever it may concern,

I refer to the application for a sexual entertainment venue licence by Spear Mint Rhino, 60 Brown Street, Sheffield, S1 2BS.

**This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of Sheffield City Council's Sexual Entertainment Venues Licensing Policy on two grounds:

Ground c):

"the number of sex establishments in the relevant locality at the time the application is made is equal to or exceeds the number which the authority consider is appropriate for that locality."

The grounds go on to state that "Nil may be an appropriate number for the purposes of [c]"

Ground d):

"the grant or renewal of a licence would be inappropriate, having regard -

(i) to the character of the relevant locality; or

(ii) to the use to which any premises in the vicinity are put; or

(iii) to the layout, character or condition of the premises; vehicle; vessel or stall in respect of which the application is made."

Sheffield City Council also has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society.

Furthermore Schedule 3 1982 Act provides specific grounds to refuse/renew license:

e) "cultural hub of city"

f) "central gateway to the city...or tourist attraction"

Our general terms of objection are as follows:

- the part of the city that the club is situated is unsuitable due to it being in the "cultural heart" of the city. The Sexual Entertainment Venue is situated in the cultural heart of Sheffield, and within the area of the railway station, the main gateway and welcome point to the city, encompassing the pedestrianised walk way up to town centre.

The Workstation . 15 Paternoster Row . Sheffield . S1 2BX  
Tel. 0114 2210225 . Mob. 07855 866292  
[info@deadearnest.co.uk](mailto:info@deadearnest.co.uk) . [www.deadearnest.co.uk](http://www.deadearnest.co.uk) . Reg Charity no. 1055134 . Company no. 3184125

- the club is situated directly next to the Hallam Students Union, a hub of young impressionable people, sometimes vulnerable and often away from home for the first time.
- the club is situated in close proximity to the Workstation, a conference facility that hosts events such as the Children's Media Conference, Sheffield Documentary Festival.
- the club is situated in close proximity to The Showroom, an independent cinema that promotes 'Young Cinema', a programme that encourages children and young adults to engage in film, and 'Kickstart', a programme for children with autism and their families.
- the club is situated in close proximity to a number of organisations which support vulnerable children and adults.
- when walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city.
- the Council's own promotion of the city is "Sheffield - where everyone matters" - this includes the female citizens of the city who should not be subjected to their city promoting and normalising the sexualisation and objectification of them
- this image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies and Sheffield's own widely publicised belief of Sheffield being a city "where everyone matters."
- granting a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city,
- the council has a duty under the Equality Act to work to eliminate unlawful discrimination, harassment and victimisation

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I also ask what actions or discussions the council has taken in order to consider what number of sexual entertainment venues is appropriate for Sheffield, as stated in the policy and legislation? Has the Council for example, as per their own policy, carried out an Equality Impact Assessment?

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

*R. (Bean Trading A Ltd) v Leeds City Council (2014)*

It was held that a council can "take a fresh look" despite no changes to the character of locality.

The case of *Thompson v Oxford City Council (2014)* was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

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If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.



Zoe Walton

Director

Dead Earnest

The Workstation . 15 Paternoster Row . Sheffield . S1 2BX  
Tel. 0114 2210225 . Mob. 07855 866292  
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## Paul Blomfield MP

Member of Parliament for Sheffield Central

Unit 1, Colwood Road Business Centre, 135 Colwood Road, Sheffield, S2 4FB  
t: 0114 272 2882 e: paul.blomfield.mp@parliament.uk  
www.paulblomfield.co.uk twitter: @paulblomfieldmp

Steve Lonnia  
Head of Licensing and Chief Licensing Officer  
Licensing Service  
Sheffield City Council  
Block C, Staniforth Road Depot  
Staniforth Road  
Sheffield  
S9 3HD

17<sup>th</sup> March 2017

**Re. renewal of a Sexual Entertainment Venue licence by Spearmint Rhino, 60 Brown St, Sheffield  
S1 2BS**

I am writing to object strongly to the above application for reasons which correspond with the grounds for refusal as set out in Sheffield City Council's Sexual Entertainment Licensing Policy.

Primarily I would urge the Council to refuse the application based on an assessment of the relevant locality, as set out in Paragraph 12 of Schedule 3 to the 1982 Act. I will set out my objections to the chosen locality according to Sheffield City Council's own assessment of what constitutes an inappropriate location for a Sexual Entertainment Venue (SEV).

Firstly, under the 'Discretionary Grounds for Refusal', your policy states that "*the grant or renewal of the licence would be inappropriate, having regard to the use to which any premises in the vicinity are put*". The Council will be aware that the premises of Sheffield Rape and Sexual Abuse Centre (SRASAC) and Sheena Amos Youth Trust are in the vicinity of this SEV. Given the nature of the work carried out by both organisations and the vulnerability of their clients, the continued presence of an SEV in the local area will continue to have an impact on their clients' safety and wellbeing. Given that the opening hours for this club are 0:00 – 0:00 and will be operating around the clock, it could impact on the safety of staff working at the charities.

I would also argue that the vicinity is an entirely inappropriate location on the grounds that it is directly adjacent to Sheffield Hallam University Students' Union, and is in close proximity to a significant concentration of student accommodation. Students would therefore be frequenting the location at all hours of the day and night. Student accommodation is used by young people, living independently away from home for the first time in their lives, for whom we have a particular duty

of care. Female students are particularly vulnerable to some of the risks or perceived risks that SEVs can engender. As the Council's Sex Establishment Policy points out, in the presence of an SEV people inevitably experience "fear of crime, anti-social behaviour, noise pollution and other disturbance".

In addition, there are other strong reasons to object to the location on the following grounds, as set out in the Council's own SEV policy – "the Council will not licence premises that it feels are in close proximity to:-

"a) a school, nursery or other premises substantially used by or for children under 16 years of age;"

Sheena Amos Youth Trust offers educational and recreational activities for children from 11 years of age, whilst SRASAC welcomes victims from as young as 13 years old. The University Technology College and Sheffield College on Granville Road are nearby. Many pupils frequent the area on their lunch break and use the road as a thoroughfare on their journey to and from school. Also, the Leadmill often events for young people from the age of 14.

"c) a church or other place of religious worship;"

Christ Church Central meets weekly at the Workstation, 15 Paternoster Row, which is in the immediate vicinity.

"d) a Hospital, Mental Incapacity or Disability Centre or similar premises;"

Freeman College, a day and residential education and care centre for young people with special educational needs and disabilities, is in the immediate vicinity.

"e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.);"

The location of this SEV is in the Cultural Industries Quarter Conservation Area. The area is a "cultural hub", housing the popular Showroom Cinema, which plays an important role in many city cultural festivals including Doc Fest, a number of art galleries, as well as popular bars and restaurants on neighbouring streets.

"f) a central gateway to the city or other city landmark, historic building or tourist attraction."

The location is evidently in very close proximity to the train station and forms a gateway to the Cultural Industries Quarter Conservation Area (CIQ). As the Council points out, in the CIQ there are 16 listed buildings and several unlisted significant buildings such as the Showroom Cinema. Sheffield Hallam Students' Union is also a city landmark, attracting visitors from across and beyond the city. As outlined above, the significant concentration of art galleries such as the Site Gallery and Yorkshire Art space Persistence Works attracts many tourists to this area. The Leadmill is also an important cultural entertainment venue and tourist attraction in the city.

I would urge the Licensing Committee to consider the strong grounds for refusing this application as outlined above. I would also hope that the Committee considers carefully the objections from local organisations and citizens, many of whom have raised strong concerns about the granting of this licence in previous years. In so doing, I hope that they will bear in mind the purpose behind the measures introduced by the Government in 2010 concerning Sexual Entertainment Venue licences,

which give local people a greater say over where lap dancing clubs open and operate in their neighbourhood.

I look forward to receiving notification of the receipt of this letter of objection and of the date and nature of the hearing that I hope will take place in due course.

With best wishes



Paul Blomfield MP

Copied to: Cllr. David Barker, Cllr. Alan Law

## Objection 45

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

### **This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

#### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

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*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'* [1]

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'* [2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.*<sup>[3]</sup>

## **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor".

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

The area which the club is in is marketed by the Council as the "Cultural Quarter" - it is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

## Additional grounds for refusal

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies and its equality duty. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city.

A sexual entertainment venue in the heart of the city is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'*<sup>[1]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

Yours sincerely

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[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in *Criminal Justice Matters*, 88:1, 10-12.

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[4] p. 90

## Objection 46

20 March 2017

Dear Sheffield City Council Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield S1 2BS.

### **This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

#### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'* || |

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'* || |



This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*‘... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.’*<sup>13</sup>

### **Location**

In its current policy, the Council states:

*“Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated “knowledge corridor”.

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club’s presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

The area which the club is in is marketed by the Council as the “Cultural Quarter” - it is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children’s media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

### **Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies and its equality duty. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city.

A sexual entertainment venue in the heart of the city is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'*<sup>[1]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

**Yours faithfully**

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in *Criminal Justice Matters*, 88:1, 10-12.

· Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87 · p. 90

## Objection 47

Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD

13<sup>th</sup> March 2017

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

**This is an objection letter to the application for this licence and I call for the council to refuse it.**

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'[1]*

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage'[2].*

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*'... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.'[3]*

### **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor".

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or

f) a central gateway to the city or other city landmark, historic building or tourist attraction.

It is directly opposite the Showroom! cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

### **Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the community bringing Communities of Identity together to tackle equalities issues within the council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

I will fully and actively support the Council in the face of any challenge to the council by giving a refusal.

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

**R (Bean Trading A Ltd) v Leeds City Council (2014)**

It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.'*<sup>[4]</sup>

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] (p. 90)

## Objection 48

The Manager  
Sheffield City Council  
Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD

15<sup>th</sup> March 2017

Dear Sir /Madam,

Application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

I am writing to object to the application for this licence and I call for the council to refuse it under the Discretionary Grounds for Refusal of Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### **The Public Sector Equality Duty and Gender Equality**

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to change their behaviour because of it being there, for example having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

### **Location**

In its current policy, the Council states:

*"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:*

**a) a school, nursery or other premises substantially used by or for children under 16 years of age;**

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC. It is in close proximity to

Freeman College which provides education for students (16 - 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "knowledge corridor"

**b) a park or other recreational area used by or for children under 16 years of age;**

There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**e) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to.

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

It is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmin Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc. There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

#### **Additional grounds for refusal**

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies.

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the council says it stands for, everything that the council should stand for, and has a duty to work towards.

Yours sincerely,



## Objection 49

Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD

Friday 17<sup>th</sup> March

Dear Licensing

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield S1 2BS.

This is an objection letter to the application for this licence and I call for the Sheffield City Council to refuse it.

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venues Licensing Policy on the following grounds:

### The Public Sector Equality Duty and Gender Equality

Sheffield City Council has "statutory obligations in relation to disability race and gender" ensuring that these factors are not used to discriminate against anyone. I believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for Sexual Entertainment Venues (SEVs) to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

When walking around this area, which as a Council you encourage people to do due to the other businesses and services in the area, women feel nervous because of the SEV and have to modify their behaviour because of Spearmint Rhino being there: for example, having to look around to see if there are people coming out of the SEV, take a different route walking to the centre of town so that they do not have to go past the SEV. Women should not have to feel like this in their city and this is discriminatory.

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note*:

*'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable' [1]*

Kolvin continues with:

*'If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage' [2].*

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

*... the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.* [3]

#### Location

In its current policy, the Council states:

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The Club is also in the centre of the newly designated "knowledge corridor".

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There is the much underused recreational space (Festival Square) directly adjacent to the club. The Club's presence deters many from using that space to its full potential.

**c) a church or other place of religious worship;**

Christ Church Central operates from the Workstation and runs a weekly service.

**d) a Hospital, Mental Incapacity or Disability Centre or similar premises;**

There are a number of charities and organisations in the area which support vulnerable children and adults, some of which cannot be named because of their confidential addresses. However, we are aware that the Council knows which organisations we are referring to

**e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or**

**f) a central gateway to the city or other city landmark, historic building or tourist attraction.**

It is directly opposite the Showroom Cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Due Fest; the Children's Media Conference; Off the Shelf, SHAFF, and so on.

There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

#### Additional grounds for refusal

This image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue in a very active part of the city, and as such giving the impression that Sheffield as a city condones both the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies. The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women. Renewing a licence would be contradictory to other work that the Council does, funds and promotes, for example the recent SheFest, the Equalities Hub within the

community bringing Communities of Identity together to tackle equalities issues within the Council and the city. Has the Council for example, as per its own policy, carried out an Equality Impact Assessment?

A sexual entertainment venue in the heart of the city, or anywhere in the city, is simply completely contradictory to everything that the Council says it stands for, everything that the Council should stand for, and has a duty to work towards.

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The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council [2014]

It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

*'Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the licence.'* [4]

The case of Thompson v Oxford City Council (2014) was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

If the panel feel that they cannot make a refusal decision without further discussion, I would ask that a hearing is held so that the application can be discussed in more detail.

I look forward to hearing from you.



**Objection 50**

**Duplicate of Objection 16**