

Objection 74

Hi,

I am aware that the licence Spearhead Rhino club is being considered for renewal. I wanted to raise an objection to this club being present in this part of the city centre. I recently had a group of friends visit from London who I met at the station. From here we explored the cultural industries quarter. While they were impressed with this part of the city centre and the gateway to city, they were shocked that this type of club was present in the quarter. Of particular concern was the proximity to the other cultural venues and the incompatibility with the feel of area. It has been described to me as embarrassing for the city. For this reason I feel that its licence should be withdrawn.

Objection 75

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

21st 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 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.

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

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Objection 76

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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

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

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

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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.

Objection 77

Dear Sir/Madam,

I would like to oppose the plans for the renewal of the license for Spearmint Rhino lapdancing club for the following reasons:

- It's proximity to student accommodation. The university area is seen to be open but safe space for students and there are many dangers that are associated with this type of venue that will potentially make this area unsafe for young people.
- It's proximity to the Leadmill night club. Young people and students leave this club very late at night under the influence of alcohol and the dangers associated with this type of venue being close by will make them, particular the young females, very vulnerable to danger on their way home.
- It's proximity to Rapecrisis Sheffield and various other charities for vulnerable people. This could discourage victims and people needing support from the area and if they cannot safely access support this could lead to them suffering further harm.
- This venue could be the cause of dangerous situations for people walking home from the railway station late at night.
- Again - it's proximity to the railway station, this type of night club which provides controversial entertainment does not give the best impression for visitors coming into the city. Especially as the area is being developed as the Knowledge Gateway for Sheffield - this type of venue is not appropriate.

I look forward to your response on this matter.

Many thanks and best wishes,

Objection 78

Dear Licensing

I am writing with regards to the application for license renewal for Spearmint Rhino, 60 Brown Street, Sheffield, S1 2BS.

The Council has a legal duty under the Public Sector Equality Duty to to have due regard to the need to eliminate discrimination, advance **equality** of opportunity and foster good relations between different people when carrying out their activities.

There is an increasing body of research and evidence that links sexual objectification of women to acts of violence including a paper from the US - Men's Objectifying Media Consumption, Objectification of Women, and Attitudes Supportive of Violence Against Women, written in May 2016, and a paper entitled Link between sexual objectification and aggression from the University of Ken written in January 2017. This research clearly demonstrates the problem of Sexual Entertainment Venues, such as Spearmint Rhinos, for Councils that are committed to carrying out their legal duties in terms of equalities.

Sheffield City Council is known for going beyond the minimum requirements of its legal duties when it comes to promoting equality for women, with its support for the Women of Steel campaign, a gender-balanced Cabinet, strong female leadership, and a Women's Hub that is supported and facilitated by the Council to tackle sexual violence and sexual exploitation/sexploitation, amongst other issues. The city also has Purple Flag status for providing an "*entertaining, safe and enjoyable night out,*" which will undoubtedly be of relevance and interest to female residents and tourists alike. The presence of a lapdancing club that sexual objectifies women is clearly counter to all of this.

Further to the issue of gender equality and sexism in light of the Public Sector Equality Duty, there are a number of grounds to object, and I support the submission by Zero Option which outlines these.

For the purpose of this objection, I have decided to focus on the following aspect of the discretionary grounds for refusing a license:

d) the grant or renewal of the licence would be inappropriate, having regard:

i) to the character of the relevant locality;

In a press release from Sheffield News Room on 13th February regarding the award of the Purple Flag Status for another year, Councillor Mary Lea, Cabinet Member for Culture, Sport and Leisure at Sheffield City Council, said:

"It's great to see Sheffield receiving this award, and our night-time entertainment offer being recognised on a national level.

"With our varied selection of bars and restaurants, as well as a thriving theatre district and huge array of cultural attractions, we in Sheffield really are leading the way when it comes to providing an eclectic mix of places to eat, drink, relax and have fun.

"I hope that Sheffield city centre will continue to go from strength to strength, with the imminent opening of the new Light leisure and entertainment complex and the creation of the New Retail Quarter."

The City Centre as a whole is undergoing significant regeneration that includes the area in which Spearmint Rhino is present, also known as the Knowledge Gateway on which the Council recently undertook a consultation with the following description:

“This project seeks to transform the corridor running along the Lower Sheaf – Porter Valley, including the station to a similar high standard as the highly acclaimed Gold and Steel Routes in City Centre.

It will improve links between several key destinations and several potential development sites. For example links within and to the Cultural Industries Quarter, Digital Campus and Sheffield Hallam University and to the Railway Station. It will improve accessibility and safety as well as the environment in order to encourage new investment and jobs. Key locations such as Fitzalan Square and streets will be transformed as part of the initiative.

The project recognises that the station is Governments preferred location for an HS2 station which may be 10-15 years away. The station is a key gateway and this project seeks to improve the existing taxi queuing, movement of traffic and pedestrian access. This should all make this area, the corridor and indeed the City Centre much more attractive to inward investment.”

These examples are relevant in terms of the discretionary grounds for refusal based on the character of the relevant locality, and backed up by recent case law from the case of Thompson, R (On the Application Of) v Oxford City Council (2014) wherein it was held by the Court of Appeal that:

“In making that assessment, the sub-committee was permitted to have regard to an imminent development of which it was aware [developments of student housing], even if there could be no certainty that it would be completed and operational within the period of the licence.”

This is an area that has been going through a period of redevelopment and one that the Council intends for further development in the coming months and years. The City Centre Masterplan, Knowledge Gateway, plans for HS2 and aspirations for an international Tech Hub are all evidence of this and I was pleased to support the Council's preferred location for HS2 in the city centre, recognising that Sheffield will be at the centre of the Northern revival with the delivery of this kind of investment and infrastructure. Whilst we are still a number of years away until HS2 is built, I feel it is important and necessary to consider the location of an Sexual Entertainment Venue within the proximity of the intended station, and the message that a lapdancing club sends to potential investors, business people, and tourists that will inevitably increase with the building of the new station.

In addition, in my role as Shadow Minister for the Digital Economy, I was pleased to meet with the Vice Chancellor of Sheffield Hallam University to discuss plans for a Tech Hub on Brown Street, and Sheffield's role as a world leader in innovation and technology. Clearly a lapdancing club is not congruent with this vision and I am concerned about the implications for Sheffield's national and international reputation in terms of the digital economy when we have visitors to the intended Tech Hub.

Therefore, I would urge you to refuse the renewal of this license application and I look forward to hearing from you with confirmation of receipt of this objection.

Yours sincerely

Louise Haigh MP

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Louise Haigh MP
Member of Parliament for Sheffield Heeley

Objection 79

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Staniforth Road
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By email to: licensing@sheffield.gov.uk

21st March 2017

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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]

The fear of violence and the impact on women's safety and freedom is frequently dismissed as a "moral argument" and therefore deemed as inadmissible and irrelevant. This was all too evident in the statement provided in the *Sheffield Telegraph* when Wildcats SEV was refused planning permission that 'Some critics claimed a sex-orientated venue would put the safety of women at risk, but officers said their recommendation was based on the impact on the area, not on moral grounds'. [4] Since when is the safety and freedom of women a "moral" issue?

Lap dancing clubs also reinforce gender stereotypes of male insatiable sexuality and female sexual availability which are hugely damaging to both sexes and non-binary people. The stereotypes upon which they are founded do not foster good relations between the sexes, as evidenced in the Zero Option Villa Mercedes hearing representation, a slide quoting former lap dancers is provided below to illustrate this point:



Zero Option Sheffield

Foster good relations between people who share a protected characteristic and those who do not

- "I always thought of the customers as vermin and, ironically, that is what they thought of me" (*Ibid.* p.13)
- "It's screwed up my view of men . . . Every time I see a man now, I just see him as a punter. There's only so many bad experiences you can have before you start hating them all . . ." (*Ibid.* p.47)
- "You start to see men as nothing more than their wallets, idiots to be fleeced for as much as you can. You start to despise them for believing you when you flutter your eyelashes and tell them they're the most interesting customer that you've ever talked to." (*Stripping the Illusion: the Lap Dancing Industry Exposed*
<https://www.youtube.com/watch?v=KhwJWkqgP2c>)

In their UK study published in 2011 Sanders and Hardy [5] reported that 30% of the women performers interviewed said that as a result of doing the job they had lost respect for men, a finding echoed in the testimonies of former performers.

For example, a former lap dancer "Elena" told the Guardian that:

"Lap-dancing reinforced all [her] negative beliefs about herself and about men. "The men just see you as an object, not a person, and whether you are equally engaged in their desire is irrelevant. Increasingly, you learn to despise the men because of the way they perceive you. Lap-dancing is about creating a situation whereby the men feel they are doing you a favour - that's the way the game is set up, so all the power is with the customer." [6]

I am sure that I need not remind the the Council of its duty under the Equality Act's requirement to pay due regard to foster good relations between men and women.

Location

In its current policy, the Council states:

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children from the age of 14. 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 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.

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 I am 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 is “one of Europe’s largest independent cinemas paired with the longest-running creative business centre in the city. Housed in a converted 1930s car showroom, we’re situated right next to the railway station in Sheffield’s Cultural Industries Quarter.” And further states that their “beautiful Art Deco environs are an ideal setting for the innovative businesses homed at the Workstation, and a perfect place for the determinedly independent and cutting edge cinema of the Showroom.” The Showroom also hosts family events as well as many off the Shelf and Doc Fest events, the latter is internationally renowned.

It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is not only centrally located in terms of proximity to a number of national and international events locations but it is also a direct access route, for example: Doc Fest; the children’s media conference; Off the Shelf etc.

There are young students not only studying in the surrounding the area but also residing in it. The 24/7 Addsetts learning centre is in the vicinity with Brown Street and Cultural Industries Quarter Square as direct access routes from numerous student accommodation blocks. The Club is next to Sheffield Hallam Students Union (an iconic and a city landmark building) and backs directly onto recently created student accommodation.

The Council states that it wishes “to support both the local community and businesses by ensuring that these types of premises [SEVs] are properly managed and that they integrate where possible into the local community” (SEV Policy p. 3). In what respect is Spearmint Rhino part of the local community? How does this internationally recognised chain of clubs integrate in any way with the Cultural Industries Quarter? How does Spearmint Rhino fit and integrate with this:

“Sheffield is a city of makers and doers, that delightedly boasts one of the largest creative communities in the country. Much of this community is concentrated in the Cultural Industries Quarter (CIQ), just between Sheffield Station and the city centre. An area that once hummed and clanked with cutlery works and toolmakers, it now sings with all manner of creative endeavour.”?

In the Council’s 2016 Determination Notice, it states:

“Members looked at the impact of Spearmint Rhino on the CIQ, specifically considering the visual and physical impact. The frontage is very discreet even when open and cannot be seen from the Showroom.”



I disagree with this conclusion, the above is not a discreet frontage; Its name (synonymous with strip clubs) is emblazoned across it in huge gold lettering spelling out the fact that it is a strip club ("Gentleman's Club") and displays the internationally recognised logo, not once but twice with its website details which if you type into the search engine takes you to a non-age restricted landing page with adult content.

Furthermore, how does the Council ensure that the premises is properly managed and enforce its obligations under the Section 141 of the Licensing Act 2003 which makes it an offence to sell or attempt to sell alcohol to a person who is drunk, or to allow alcohol to be sold to such a person on relevant premises? In light of the recent case of Gil David who it is reported claimed that Spearmint Rhino had "exploited" his drunkenness and stated:

'I wasn't in control of my faculties and didn't realise what I was spending' adding that 'I was coerced into spending a third of my salary in five hours.' [7]

Further 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 fact that its location within Sheffield Hallam University buildings and the CIQ also conveys the message that this SEV is culturally embedded within the two and indeed integral to a higher education experience and Sheffield's local heritage.

The Spearmint Rhino logo is internationally recognised and is synonymous with stripping and the sexual availability and objectification of women as well as the hyper-masculinity of men. 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." [8]

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.

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] Sheffield Telegraph 1st March 2013 No Wildcat action as lap dance venue in Sheffield is blocked
<http://www.sheffieldtelegraph.co.uk/news/no-wildcat-action-as-lap-dance-venue-in-sheffield-is-blocked-1->
- [5] Sanders, T., & Hardy, K. (2011) *The Regulatory Dance: Sexual Consumption in the Night Time Economy – Initial Findings*. Leeds: University of Leeds
- [6] The Guardian 19th March 2008 *I was seen as an object, not a person*
<https://www.theguardian.com/world/2008/mar/19/gender.uk>
- [7] *Man from NI taken advantage of in Spearmint Rhino strip club says Bournemouth councillor*
<http://www.bbc.co.uk/news/uk-northern-ireland-30013478>
- [8] p. 90

Objection 81

Dear Licensing Team,

Please accept this email as an objection to the current license renewal application of Spearmint Rhino. There are many reasons to this objection, including gender equality, female objectification and damaging image in arrival to the city. You are welcome to email me for further details. I look forward to there being a hearing.

Hi,

Thanks for reply. Excuse the bullet points (done for speed and clarity). Reasons I object:

- Sheffield is a modern city, aspiring to be a recognised city for culture, arts, heritage, etc. Such an establishment is the opposite to this.
- I have experienced first hand people commenting "Your welcome to Sheffield is a waterfall and a strip joint." This is a negative image for the city.
- It is 2017 and the Council should be striving for equality and reducing female objectification. The renewal of this licence would be the council corporately endorsing sexism, inequality and objectification.

Thanks for you communication.

Head of Licensing & Chief Licensing Officer
Block C
Staniforth Road
Sheffield S9 3HD
email: licensing@sheffield.gov.uk

20 March 2017

**Re: Application for Sexual Entertainment Venue Licence
by Spearmint Rhino**

vida
life without abuse

formerly
Sheffield Domestic Abuse Forum

Knowle House
4 Norfolk Park Road
Sheffield S2 3QE
t: (0114) 275 0101
f: (0114) 278 1308
e: admin@vidasheffield.org.uk

Dear Licensing Department,

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 Vida Sheffield call for the council to refuse it.

We 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. We believe that a sexual entertainment venue directly discriminates against women by normalising the sexualisation and objectification of women and girls, 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'

www.vidasheffield.org.uk

VIDA Sheffield | Registered Charity No: 1092661 | Company Registration No: 4405173

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, and the pedestrianised walkway to the town centre;
- the club is situated directly next to the SHU Students Union, a hub for young impressionable people, often away from home for the first time and vulnerable;
- when walking around this area, which you encourage as a Council due to the other businesses and services in the area, women and girls feel nervous because of the SEV and have to change their behaviour to take account of it. For example, having to check to see if there are men coming out of the SEV, and taking a different route to the centre of town so that they do not risk walking past an SEV – women and girls should not have to adapt our lives in this way in our city;
- the Council's own promotion is of 'Sheffield – where everyone matters' – this should include the female citizens of the city, who should not be subjected to their city promoting and normalising their sexualisation and objectification
- the image of a high-end establishment portrayed by this SEV goes in some way to normalising this type of venue, in a very busy social hub of the city, giving the impression that Sheffield as a city condones the sexualisation and objectification of women, which is in complete contradiction to the Council's equality policies and Sheffield's own widely publicised belief that Sheffield is '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 festival for International Women's Day, the One Billion Rising flash dance event to combat Violence Against Women & Girls, the Equalities Hubs bringing Communities of Identity together to tackle equalities issues within the Council and the city.
- the City Council has a duty under the Equality Act 2010 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.

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

The law on SEV licensing states that Local Authorities have a duty to consider their legal obligations with regard to the Public Sector Equality Duty (PSED) when considering license applications. Public Sector Equality Duty decisions should have due regard to fostering good relations between men and women, and this involves tackling inequality.

In their recent consultation, Sheffield City Council appeared to agree that Sexual Entertainment Venues involve the objectification of women. In allowing the licensing of even one SEV in the city, the Council is effectively endorsing and facilitating the objectification of women and undermining any efforts to promote healthy sexual practices, by the Council or your partners.

This normalisation of harassment and discrimination against women creates a hostile environment for women and girls in Sheffield, and contributes to the appalling levels of sexual and domestic violence and abuse, with the devastating impacts that we see daily in our Eva Therapy Service for women and girls affected by abuse and trauma.

We would respectfully but strongly urge the Licencing Committee to refuse this licence application by Spearmint Rhino, and in response to the recent consultation, to go on to set a nil cap for SEV's in the city.

The City Council is asked to note that in the last few years other councils have successfully defended a refusal to renew 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.

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

Vida will fully and actively support the Council in the face of any challenge mounted in reaction to refusal of this licence application.

We look forward to hearing from you.

Yours sincerely,



Maureen Storey
on behalf of the Vida Sheffield
Management Committee and staff team

Objection 83

Dear sir/madam - I am writing to object to the application for renewal of Spearmint Rhinos licence. My reasons as a frequent visitor to the city are that it creates an atmosphere in the local area that I find sexist and appears to condone seedy and unsavoury behaviour. It also seems incongruous with Sheffield's aspirations as a city of culture for the 21st Century and beyond.

Yours sincerely

Objection 84

Licensing Service
Block C, Staniforth Road Depot
Staniforth Road
Surrey Street
S9 5HD

21 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 stemming from recent policy change in the area allowing a council to reject a license because:

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

Knowledge Gateway Hub (see appended materials)

Stemming from almost 7 years of work, Sheffield City Council has gained over £5million investment to radically alter the area that links Brown Street and Fitzalan Square as a so-called 'Knowledge Gateway'. Site Gallery is one key element of that programme which sees more than £100 million of capital developments underway. There is optimism and investment that the city can change for the better.

The majority of the investment has come from Sheffield City Region. It is to make the city look and feel better and to build the infrastructure that will contribute to a vibrant economy (with a focus on jobs that will provide higher salaries and prospects for the people of the city). The investment has already seen some positive results. However, it is stymied at a city branding level. When we come to launch the new Site Gallery, for instance, I am sure that at least 25% of the press (and we expect coverage from all of the nationals) will focus on the location of Spearmint Rhino. It degrades the city's reputation against all the economic and social indicators that it presents (vibrancy/economy/cultural-educational hub).

Education & Cultural Hub

Site Gallery, a stalwart of the local cultural scene, has raised £750,000 from public funds to invest in new public artwork, a children's play area, lighting and design for the area. The investment is to build a 'destination' around an art street including Site Gallery, the Workstation and Yorkshire Art Space. With Spearmint Rhino sitting in the middle of the piece, overlooking the proposed new 'Festival Square', the project is incredibly difficult to achieve. Spearmint Rhino undermines the messages

of 'safe place', 'aspirational growth' and 'new economies'. It throws the city backwards.

Sheffield City Council is itself investing cash and land for this ambitious and exciting project which Sir Nicholas Serota, now Chair of the Arts Council has described as a 'game-changer'. By extending this license, the city will potentially lose face and the faith of its people.

Dead real estate – barrier to success:

As the manager of a business in the area, I believe that my economic success has been massively impacted by the negative presence of such a low-grade branded business opposite the gallery. The Spearmint Rhino building (currently for sale) could be bought by a good, productive, outward facing, even creative company, but with the remaining lease in place it is impossible to move the area on. I know of a number of potential buyers for the building but who cannot make an offer because of the extant license.

Additional Points:

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 directly adjacent to the club. The Club's presence deters many from using that space to its full potential. There are three schools within a 5 minute walk of the club.

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

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?

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.

I believe that if Sheffield City Council, at this juncture of massive change that they have invested in, cannot refuse this license they will have made a mockery of their own staff, their citizens and the businesses and cultural agencies who are working so hard to bring investment to the city. This will be writ large in the press and across the UK as the buildings in the area begin to make their public launches. It will preclude further investment and show Sheffield as a place that does not take it's city seriously.

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 truly

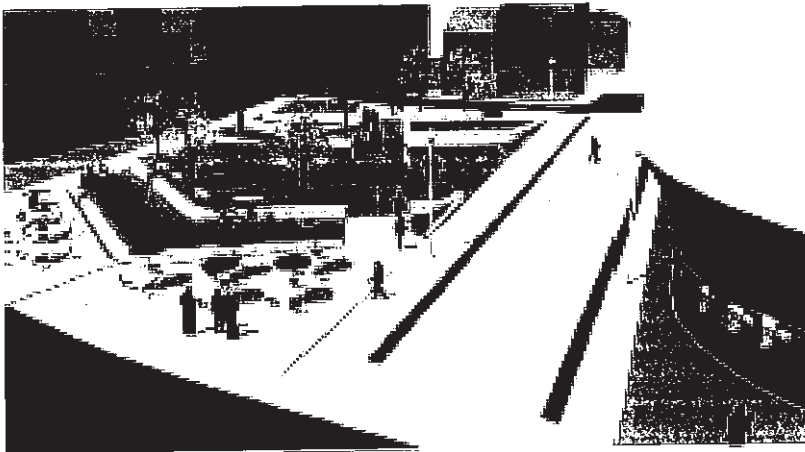
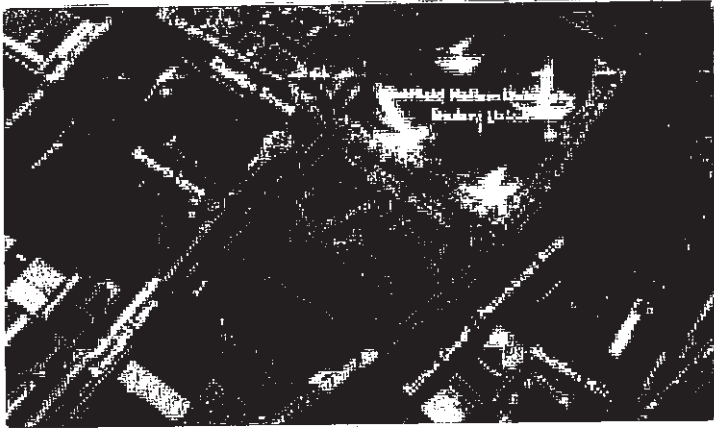
[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[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.

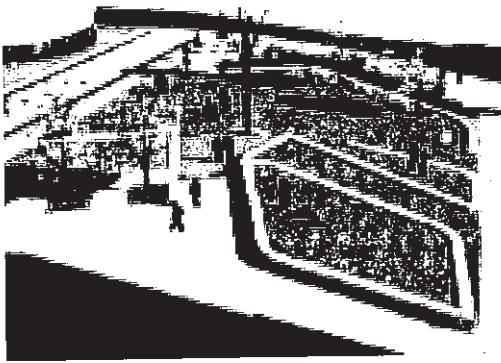
[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] p. 90

Ideas to change Pinball Park to Festival Square



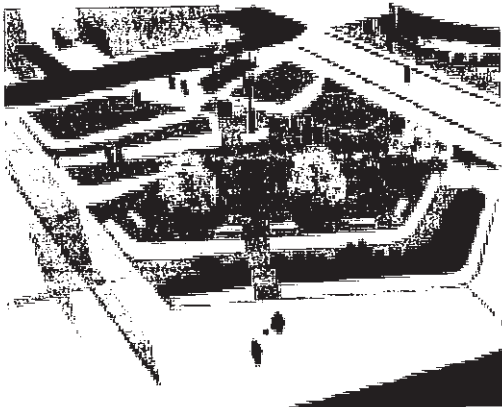
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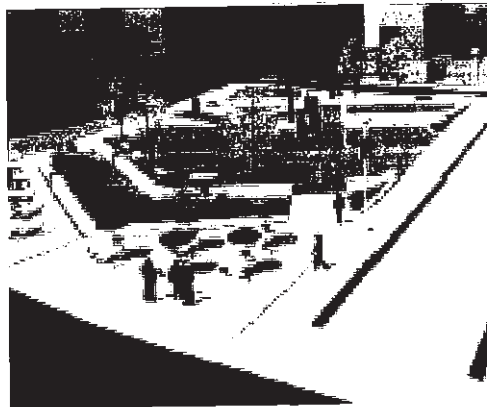
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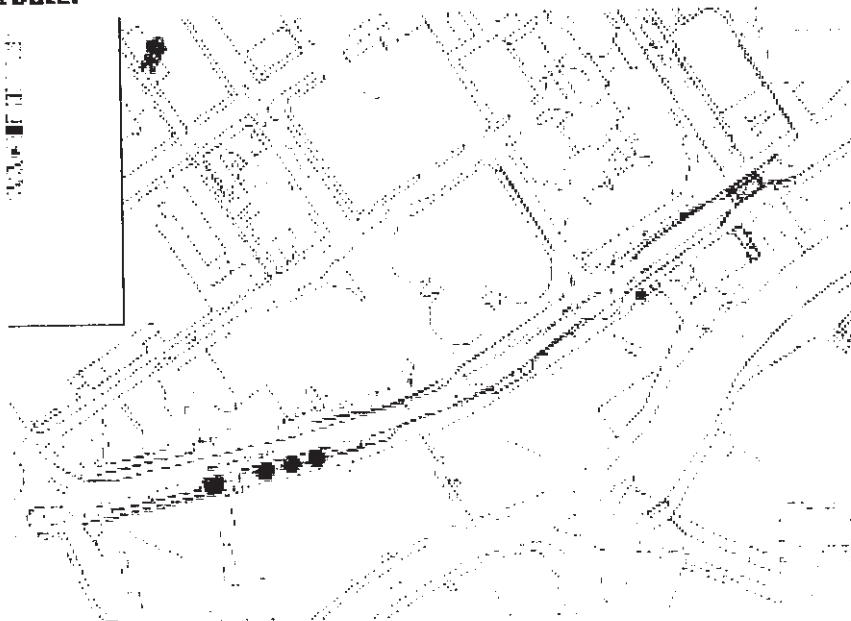
View 3



View 4



New Sustainable transport network – bike route and pedestrian prioritised route.



Objection 85

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

21st 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 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)

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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 86

To Whom It May Concern

I'm mailing to express my opposition to the re-licensing of the above 'Sexual Entertainment Venue' I've read the policy around licensing these SEVs and as far as I can see this premises contravenes a number of points in the policy due to its positioning.

Apart from those issues I have a 15yr old Daughter who regularly goes to the Showroom Cinema with her teenage friends, I find it absolutely horrendous that they are aware of and see Spearmint Rhino, they feel embarrassed and just don't understand why it's allowed to be there.

They feel threatened by the presence of the building and worry about the people around that area, I worry if they come out of the cinema in the evening that I may be late and they may encounter men attending the Club, I never meet them for example in the car park or across the road from the Venue as I am pretty convinced that the men who visit the club have an unpleasant, distorted view of women, our sexuality and possibly teenage girls.

My daughter and her friends are fully aware of the type of venue that Spearmint Rhino is and the people attending, they also know how the women are treated there, they and I do not understand why the Club is on that site, in an otherwise accessible and vibrant Cultural area, it feels as if it normalises that behaviour of sexually objectifying women's bodies for men.

We all wonder how a Labour Council that we voted for and support can propagate this out of date, misogynistic view of women by agreeing to the Venue, I wonder if you could explain that to me, my daughter and her friends?

There was an awful rape of a Nurse recently in a Weston Park it's not related to the venue but it is a very real reminder that sexual violence is a reality for women and girls, this Venue does nothing to kick against that normalisation of women's bodies being available at any time for mens use.

As a woman who was repeatedly sexually abused and suffered domestic violence as a child and as a lifelong Labour supporter and life long Public Sector worker I'm asking you to respect me and my daughter and please stand up for us and not support the re licensing of Spearmint Rhino.

Please don't let big business and money always win through, things aren't great in the world at the moment for 'everyday' people, so please stand up for us now.

Thank You

Objection 87

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*:

'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:

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.

Objection 88

OBJECTION TO SEV LICENSE RENEWAL APPLICATION FOR SPEARMINT RHINO, BROWN STREET SHEFFIELD

Dear Mr Lonnia,
I wish to register my objection to the above SEV license renewal application.
There are many grounds on which I place my objection.

1. Incompatibility with the Council's obligations under the Public Sector Equality Duty.

The PSED requires the Council to consider the consequences of decisions, including licensing decisions, with regards to fostering good relations between the sexes. Sexual Entertainment Venues exist as there is a culture of misogyny and violence against women and girls in our society and their existence continues to perpetuate that same culture. This happens because the purpose of strip and lap and pole dancing clubs is for men to pay to have access to women's bodies without full, proper, meaningful consent. This means that women are viewed as sexual objects- access to their bodies bought.

There is a growing body of evidence in reputable journals demonstrating that the link between men's violence against women and girls and strip and lap and pole dancing clubs is this: that the degree to which these abusers view women as objects rather than full human beings is directly related the severity of their violent behaviour towards their female victims.

Thus the more they objectify women the worse their violence.

I wish to draw the attention of the Licensing Committee to a Freedom of Information 20161515 disclosure from South Yorkshire Police which shows that between 2013 and 2016 there has been an increase of 171% in the number of sexual assaults on females 13 and over and rapes of females 16 and over in the Central Ward of Sheffield (from 29 in 2013 to 80 in 2016) and an increase of 110% in other areas of Sheffield on average. Thus the Central ward is disproportionately affected by these offences and this is a progressive trend so the city centre is becoming less safe, particularly for women.

I am also concerned that a Freedom of Information request to South Yorkshire Police disclosed there were 33 incidents reported to the Police from 2012 to 2016 involving the words 'Spearmint Rhino' . The information provider declined to give further information about the content of these reports. This is in spite of previous Licensing Reports stating that the Police had reported no incidents involving Spearmint Rhino.

As well as the harm above there is harm caused to the strippers and dancers.

The psychological effects of having to split off mind and emotions from the act of stripping and lap and pole dancing, involving a display of semi or total nudity combined with a particular form of movements designed specifically to sexually titillate-the purpose of these venues- is inevitably harmful.

The split is necessary as the act of stripping and lap and pole dancing does not involve proper consent: indeed, money would not be required if there was consent as is understood within the context of a sexual relationship. It is not possible to maintain a healthy psychological balance whilst closing down and shutting off one's own emotions to enable oneself to go through with an act, be that stripping, lap or pole dancing or anything else.

Copious testimonies from women who have been strippers or lap and pole dancers testify to this. This has been ignored for too long. There seems to be almost a taboo in acknowledging this. The campaigning group Zero Option has supplied several relevant quotes and research references to the Licensing Committee in their various representations

and I can supply these too if requested. I would be happy to supply copies of the referenced material to the Licensing Committee on request.

Thus the harm caused to women strippers and SEV dancers cannot be considered to foster good relations between the sexes: the women who have worked in these venues often express their utter disdain for men who use them. They recognise that there is a power imbalance in the exchange of money for access to their bodies and they disrespect men who would treat women thus.

2. Incompatibility with the Gender Equality Act.

The power imbalance involved in being treated as an object with lower status and value than a full human being promulgates gender inequality. Sheffield Council states its wish to respect all citizens and indeed has set up a Women's Hub –a group formed to address gender inequality within the city as part of its work to tackle inequality: to grant an SEV license to Spearmint Rhino would be incompatible with this aim.

The Equality Impact assessment, a legal requirement, regarding the impact of this sexual entertainment venue has not been published. This must surely be a necessity.

With a clear understanding of how the power imbalance replicated in SEVs (money buys access to a woman's body, thus symbolically and effectively reducing her to the status of an object, that object being her body, and thus negating her essential humanity as a living breathing human being) is part of and perpetuates a certain view of women as lesser beings, which is at least part of what enables some men to break the psychological taboo against being violent (which exists to enable us to live together peaceably), at least with regard to their behaviour towards women and girls.

3. Location

Spearmint Rhino is in an inappropriate location for many reasons;

Sheffield Council's SEV Policy states that the Council will not license premises that it feels are in close proximity to;

a) A school, nursery or other premises used substantially by or for children under 16s- yet the University Technical College and Sheffield College Granville Road campus are both nearby and access to these involves passing by Spearmint Rhino, for example by children getting on and off buses on the inner ring road by SHU. Freeman College for 16-25 year olds who are all vulnerable is very near.

Spearmint Rhino is situated at the heart of the newly designated 'Knowledge Corridor' around which a lot of city redesign, rejuvenation and planning is coalescing. It is not appropriate to have an SEV in this location.

b) A park or other recreational area

The Cultural Industries Quarter Square, sometimes called Festival Square, is adjacent to Spearmint Rhino. The presence of this club deters many from accessing this potentially valuable outdoor space in the heart of the city and in the heart of the Cultural Industries quarter.

c) A church or other place of religious worship

Christ Church, which worships in the Workstation on Sundays would like to be able to allow the children who attend to play in Cultural Industries Quarter Square but feel it is inappropriate due to being next to a strip club.

- d) A hospital, mental incapacity or Disability Centre or similar premises
Together Women, an organisation supporting 12 to 19 year old girls and young women is located at the rear of Spearmint Rhino. Many if not all of their clients will be vulnerable. Elements Society which works with vulnerable people is also nearby as is another organisation working with vulnerable people which it would be inappropriate to identify but of which the Council is aware.
- e) The cultural hub of the city
A number of international events are held at the Showroom and Workstation as well as at the nearby Sheffield Hallam University and Students Union Hubs which are adjacent to Spearmint Rhino, such as DocFest and the Children's Media Conference as well as Off The Shelf and SheFest.
Spearmint Rhino is opposite the Site Gallery. This is closed for redevelopment as it is expanding to include a young people's education space amongst other features. As John Mothersole, Chief Executive of Sheffield Council, himself said in his speech at the Site closing event, the Site gallery sits 'right at the heart of the cultural growth of the city', the Site and area around it which is being redeveloped will be the 'entrepreneurs' and artists' soul of the area', and the Site surrounding area's redevelopment represents 'a fundamental change and a new chapter for the 21st century'.
Thus it is incontrovertible that Spearmint Rhino now stands in a cultural hub of the city- as I would contest it always has done. One difference now is that a further phase of area improvement aimed at increasing access, business and tourism has started. Reviewing all evidence with a fresh eye should lead to the conclusion that license renewal would not be appropriate with regard to location; the nature of the surrounding area is changing.
- f) A central gateway to the city or other city landmark, historic building or tourist attraction
Sheffield Hallam University and its Student Union Building is adjacent to Spearmint Rhino. Some students will be under 18. The club backs onto student accommodation. Spearmint Rhino runs numerous promotions to encourage student attendance.
Many women who use the facilities in the area-the Showroom cinema, workstation, Site gallery or Perseverance Works have to walk past Spearmint Rhino and are anxious and uncomfortable about doing so: and I am one such example. I sometimes walk a longer way to avoid passing the club, particularly when it is dark.
I am not reassured by the presence of security men on the door of the club: rather it alarms me that they are seen as a necessary requirement for the club to operate, as that tells me trouble is expected.
I do hope the Licensing Committee will take a fresh look at this license renewal application. It is lawful NOT to grant a license renewal even where an SEV has been in operation for several years if it can be demonstrated that there are appropriate grounds. A change in use of the area would constitute such grounds if that then renders the location unsuitable, as evidenced by a decision of the Oxford Licensing Committee, which was upheld at a subsequent Judicial Review.

I would be grateful if you would acknowledge receipt of this objection and inform me of any Licensing Hearing that is arranged to discuss the matter further.

Yours sincerely,

Objection 89

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

21st March 2017

Dear Licensing Officers

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

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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 and this is discriminatory.

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

We are based at Scotia Works on Leadmill Road, in fairly close proximity to the venue, and hold events for children under 16 years of age, as do other organisations in the building and at Freeman College, also on our road, which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs. There are other educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC.

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

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 also young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation. For the above reasons I would like you to record my objection and that of the Trustees and staff of my organisation to the renewal of the Sex Establishment License for Spearmint Rhino at 60 Brown Street, Sheffield S1 2BS.

Yours

Rob Unwin

On behalf of the staff and Trustees of DECSY

Development Education Centre (South Yorkshire)

Centre for Learning, Development and Citizenship

Scotia Works

Leadmill Road

Sheffield S1 4SE

DECSY is a Charitable Incorporated Organisation, no: 1153377

www.decsy.org.uk

Objection 90

Licensing Service

Block C, Staniforth Road Depot

Staniforth Road

Surrey Street

S9 3HD

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

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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.

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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.

[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)

90 (cont'd)

I didn't mention in my original email but I am also Trustee/ director of Sheffield Rape & Sexual Abuse Centre on Leadmill Road. As an organisation we are against the proposal to renew the licence for the reasons mentioned and have lodged a separate objection. However from a personal perspective, I live and work in Sheffield. Our SRASAC board meetings are in the evening and I feel uncomfortable and unsafe walking by Spearmint Rhino especially after dark. I imagine vulnerable women attending Scotia Works, students at the Hub and most women alone getting from A to B around it may feel a similar way.

I'd be grateful if you could add this (or at least my role & interest) to my objection below, as I doubt I will be able to attend the consultation meeting which will be during working hours.

Many thanks

Dear Madam/Sir

Re: Licensing Committee

Sexual Entertainment
Venue

Spearmint Rhino License
Deadline March 21st
2017

I am writing this from my hospital bed. I recently experienced a heart attack and am confined to coronary care.

I am writing to object to the licensing application for Spearmint Rhino.

My primary grounds

few objections are based on the highly inappropriate location of a strip/lap dancing club in an area populated by some of the jewels in the crown of Sheffield's cultural heart.

I note John Matthews' recent public statements in relation to the re-branding of "Shift" which is within view

close proximity to
Spearman's Rivine.

I note the number of
support and educational
facilities in the area
including support for
adults who are at
risk, some of whom
are likely to have
experienced exploitation
or significant disadvantage.

I note the proximity
of a women's support
project at one
side of the square

occupied by 2 female
Akins and the
refusal of one of
my clients to consider
her daughter, who
has difficulties
to attend the venue. This
the point that it is
no near to a SUV

and she did not
want her teenage
daughter to be
exposed to
an enterprise
which promotes the
dequalification of WOMEN

*This is unsurprisingly the case (see Specialist Kin's advertising ~~advertising~~).

I note my own feelings of discomfort in walking around the area in the daytime both to attend meetings and as part of a city centre facilities scoping exercise

This is not related to fears of assault or sexual harassment of me though these issues may be relevant to

Some women (and men)

It is about the extent to
which SR abuses: treated under-

I note common sources ^{use}

which took place ^{and}

with parents / ~~that~~ ^{as a}

of / and new students ^{at}

during a recent day

of welcome to Hallam
University in Sheffield.

^{These confirm for me that}
the possibility of

this business to

a student facility

(the clubs), combined

with 2 prominent

known active

promoter of free

rights concerning
alcohol consumption
and sexual identification
is inappropriate, and
incompatible with
plans to develop a
learning corridor in that
area of the city.

I would expect this
letter to be taken as
seriously as any other
objection to receive
an invite to any
future hearing.

I write as an
individual objector.

Objection 92

Dear Mr Lonnia,

I am writing to express my concern about the application for a sexual entertainment venue licence by Spearmint Rhino at 60 Brown Street, Sheffield. S1 2BS.

I wholeheartedly support the campaign against this license and wish to add my objection and ask that the City Council refuse the application.

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 by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society.

Location

This is a well-used area with thriving businesses and services and it would be a great shame if women are discouraged from visiting or working there because of the presence of a Sexual Entertainment Venue. It is well evidenced that this type of venue makes women feel threatened or uncomfortable.

There are educational institutions in the vicinity, the newly designated 'knowledge gateway', a number of charities and organisations and a church based at the Workstation.

The City Council have put so much time, effort and support into making this area an exciting and accessible hub. It would be great shame if this application severely damages that progress. I would also add that it is not only women that find this type of entertainment venue unacceptable in such a well used area but also many men who find it objectionable both for themselves and their families.

I hope the City Council will refuse this application.

Yours sincerely

Gill Furniss MP

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

20th March 2017

Dear Licensing

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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' ___.

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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 gateway".

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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 _____) 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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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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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:

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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.

Yours faithfully

(A very concerned member of the public,)

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Objection 94

Dear Sir / Madam,

I am writing as a ward councillor to lodge an objection to the renewal of the Spearmint Rhino licence.

In doing so, I wish to support residents and other businesses in City Ward who are adversely affected by this lap-dancing club.

Whilst Spearmint Rhino has been trading for a number of years, its location is becoming increasingly unsuitable for a lap-dancing club. The growing development of the Cultural Industries Quarter and the expansion of student accommodation and teaching locally are highly relevant to the appropriateness of the location. The premises are located on what is to be known as the Knowledge Gateway, recognising the enhancement of the area as a place of creative knowledge and progressive development.

A lap-dancing club is increasingly at odds with this vision. I am therefore disappointed that the application form submitted does not attempt to address any of the licensing objectives except by stating it is a renewal application.

The nature of a lap-dancing club means there is significant difference in the treatment of the sexes. In particular, I understand the establishment treats the regular staff (mostly if not all, men) as employees but requires the dancers (i.e. women) to be self-employed, with correspondingly lower degrees of employment protection. This is not a matter of choice on the part of the dancers. The local authority must demonstrate it has due regard to the various principles in the public sector equality duty when considering the application, so as to comply with its own legal obligations.

If the authority is minded to grant the licence, I would support a condition requiring all workers, including dancers, to be engaged directly only under the terms of a written contract of employment.

I trust the Committee will take these views into account.

Yours faithfully,

Douglas

Cllr Douglas Johnson,
City Ward, Sheffield
07500 766 189

Dear Licensing People;

Re; application for 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 the application.

Discretionary Grounds for Refusal of the current Sheffield City licensing; I refer to the application for a sexual entertainment venue licence by Spearmint Rhino, 60 Brown Street, Sheffield. S1 2BS.

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 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:

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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]

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I look forward to hearing from you.

Ali Denby ~ Sheffield

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Objection 96

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

22/3/17

Dear Licensing

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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:

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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.

I am a Trustee of Support After Rape and Sexual Violence Leeds. We visit Sheffield and some of the women we support have come from Sheffield.

Support After Rape & Sexual Violence Leeds (SARSVL) supports women and girls who have been affected by sexual violence at any time in their lives, promoting their needs and working towards the elimination of sexual violence.

“Every woman in our society feels the fear of rape - no woman is allowed to ignore it.....The threat of violence is a total intrusion into women's personal space and transforms a routine and/or potential pleasurable activity (for example, a walk or journey).....into a potentially upsetting, disturbing and often threatening experience.”
Rape Crisis England & Wales

Having a lap dance club in the City Centre encourages men to treat women as objects for their use. It infringes on women's right to autonomy.

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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 97

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

21st 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 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. Next year I will be looking for universities to study at and I would ideally like to stay in Sheffield, however I wouldnt feel comfortable with a strip club being in such close distance to where I would be studying and it would really put me off.

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.’[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.

Personally, I am worried that young people growing up with this image of women right in front of them will distort their expectations and feelings towards them. Furthermore, I don't want that to have an impact on how others are treated and how I, and other women, would be seen in their eyes and I can strongly say I would feel exactly the same if the tables were turned.

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 98

To the Sheffield City Council Licencing team,

I am writing to you about the application to renew the "sexual entertainment" licence for Spearmint Rhino.

I strongly object to this application.

As a Sheffield NHS GP, I sadly see the devastating effects of sexual violence and rape. There is concrete evidence that lap dancing clubs etc increase sexual violence.

Please read the attached PDF document "Facts on lap dancing - Stripping the illusion".

A vote in favour of the Spearmint Rhino application will very likely lead to two things.

First, an increase in physical sexual violence, i.e. rape, against women in Sheffield. Second an increase in verbal sexual harassment against women. This too is of course now illegal.

See <https://www.citizensadvice.org.uk/law-and-courts/discrimination/what-are-the-different-types-of-discrimination/sexual-harassment/>

"Sexual harassment is a form of unlawful discrimination under the Equality Act 2010. The law says it's sexual harassment if the behaviour is either meant to, or has the effect of:

- **violating your dignity, or**
- **creating an intimidating, hostile, degrading, humiliating or offensive environment**

I am about to start work as a GP at the Sheffield Asylum Seeker Health Centre. This is only a 9 minute walk from Spearmint Rhino. Half of the women registered at the Asylum Seeker Health Centre are victims of trafficking. Many of these are victims of sexual trafficking.

Sheffield has established itself as a City of Refuge, and this is something we can be rightly proud of.

<https://sheffield.cityofsanctuary.org>

It is therefore incongruous and contradictory for Sheffield City Council to establish Sheffield as a city of Refuge, while another part of the City Council approve a sexual entertainment licence, that will likely increase sexual trafficking and sexual violence.

I respectfully urge you to vote against the renewal of the Spearmint Rhino licence.

Yours sincerely,

31st March 2017

To the Sheffield City Council Licencing team,

I am writing to you about the application to renew the sexual entertainment licence for Spearmint Rhino.

I strongly object to this application.

I am a Sheffield NHS GP, with 19 years experience as a GP, 24 as a doctor. During my career I have sadly frequently see the devastating effects of sexual violence and rape on a regular basis.

Only last week I was consulting with a woman, Anna (not her real name) who has symptoms of depression and post traumatic stress disorder. She disclosed to me a history of multiple drug rape, which occurred about 5 years ago in Sheffield. She has given me permission to use her anonymised patient information. She informed me that she knows the men who raped her (one was her ex husband). She also knows that these men used to attend sexual entertainment clubs in Sheffield.

There is concrete, non-contestable, legally sound evidence that "sexual entertainment clubs" increase sexual violence in cities in which they are located. Please search Google for a PDF document "Facts on lap dancing - Stripping the illusion".

There is also strong evidence that sexual entertainment clubs also lead to an increase in **verbal sexual harassment** against women. This too, is of course, now illegal.

Please see

<https://www.citizensadvice.org.uk/law-and-courts/discrimination/what-are-the-different-types-of-discrimination/sexual-harassment/>

"Sexual harassment is a form of unlawful discrimination under the Equality Act 2010. The law says it's sexual harassment if the behaviour is either meant to, or has the effect of:

- violating your dignity, or
- creating an intimidating, hostile, degrading, humiliating or offensive environment

Sheffield has two universities very large student populations. Half of these students are young women between the ages of 18 and 22. It is likely that the vast majority of these young women will be opposed to the renewal of the licence for Spearmint Rhino, once they are made aware of the evidence of an increase in both physical and verbal sexual abuse.

For these reasons I strongly urge Sheffield City council to turn down the renewal of the licence for Spearmint Rhino.

I am employed as a GP at both Darnall Primary Care Centre, and at the Sheffield Asylum Seeker Health Centre. The latter medical centre is only a 9 minute walk from Spearmint Rhino. Half of the women registered at the Asylum Seeker Health Centre are victims of trafficking. Many of these are victims of sexual trafficking.

Sheffield has established itself as a City of Refuge, and this is something we can be rightly proud of.

<https://sheffield.cityofsanctuary.org>

It is therefore incongruous and contradictory for Sheffield City Council to establish Sheffield as a city of Refuge, while another part of the City Council approve a sexual entertainment licence, that evidence suggests will lead to sexual physical and verbal, abuse and violence against women in Sheffield.

I respectfully urge you to vote against the renewal of the Spearmint Rhino licence.

Yours sincerely,

Dr Chris Bronsdon

MBCChB MRCGP

The growth of lap dancing clubs has fed into what OBJECT terms 'sex-object' culture – the mainstreaming of the sex and porn industries and the ever increasing sexual objectification of women and girls. With lax licensing laws leading to the number of lap dancing clubs doubling over the last five years, and a PR makeover branding lap dancing as glamorous and 'harmless fun', we have found ourselves in a situation in which major retailers sell pole dancing kits along with pink frilly garters and paper money in their 'toys and games section'¹, and leisure centres offer pole dancing lessons to girls as young as twelve². This has led to 25% of teenage girls seeing being a lap dancer as their *ideal* profession³.

FACT THREE: Lap dancing clubs are linked to wider systems of prostitution

As well as the structural conditions in lap dancing clubs which pressure many performers into offering extra sexual services, research further shows that, even if clubs do enforce a no touching rule, and even if there is no sexual contact between dancers and customers, **the presence of strip clubs in a locality increases demand for nearby prostitution services**⁴.

This places lap dancing on a continuum of commercial sexual activity, irrespective of whether the sexual exchange occurs within the club itself.

FACT FOUR: Lap dancing clubs create 'no-go' zones for women in the local vicinity

Research undertaken in the London Borough of Camden found a fifty percent **increase in sexual assaults** in the borough after the rapid expansion of lap dancing clubs⁵. Personal testimony reinforces the idea of a link between the expansion of lap dancing clubs and increased levels of sexual harassment for women in the vicinity:

¹ Eden, I. (2007) *Inappropriate Behaviour: Adult Venues and Licensing in London*, London: The Lilith Project, Eaves Housing for Women.

² BBC News Online (2006), 'Children are Taught Pole Dancing' Tuesday, 12 December 2006, url: <http://news.bbc.co.uk/1/hi/england/tyne/6173805.stm>

³ http://www.manchestereveningnews.co.uk/news/ts/161/161338_naked_ambition_clubs_off_on_teen_girls.html

⁴ Coy, M, Horvath, M & Kelly, L (2007) *It's just like going to the supermarket: Men talk about buying sex in East London* London: Child and Woman Abuse Studies Unit

⁵ Eden, I. (2003) *Lilith Report on Lap Dancing and Striptease in the Borough of Camden*, London: The Lilith Project, Eaves Housing for Women

"Once I walked past [a local strip club] at closing time, when a stripper tried to discreetly leave the premises and a group of punters stood outside. On recognising her, they erupted into loud whooping and cheering as she ran across the road to get away. I found this behaviour completely intimidating and totally in keeping with the atmosphere of the street sexual harassment that makes women feel uncomfortable on a daily basis. Audiences are encouraged to engage the area, often with loud and obnoxious comments and gestures and to make it a habit to hang around outside strip clubs. This is what their own behaviour has done to the area and it is a direct consequence of the conditions created by the strip club industry. It is a direct consequence of the normalisation, legitimisation and regulation of the sex industry in areas that women feel safe and confident to walk through and to be without the fear of harassment and abuse."

Some residents also object to the dancing being loud and noisy.

Furthermore, a recent six-month review⁶ into the licensing of strip clubs in the **London Borough of Tower Hamlets**, which received the highest number of contributions in recent years for a public consultation, stated:

"Some people referred to the impact of new sex services [strip clubs] were having on the character of the area, with one of the main concerns being a new atmosphere 'not family friendly' around the various streets where strip clubs are located, especially through residential streets. Some also raised concerns about increased noise, walking past strip clubs."

In addition, the **UK Royal Institute of Town Planning** issued a Good Practice Note in December 2007 on the issue of lap dancing clubs and women's sense of safety⁷:

"In relation to the 24 hour community safety, ensure that the flows of women are considered. Evidence shows that in certain locations, lap dancing and exotic dancing clubs make women feel threatened or uncomfortable."

Links between the expansion of lap dancing clubs and increased levels of sexual harassment and assault led the **Women's National Commission** to include the need to regulate lap dancing clubs in their **submission to the UN Commission on the Elimination of Discrimination Against Women (CEDAW) 2005**:

⁶ London Borough of Tower Hamlets (2008) *Licensing of Strip Clubs*.

⁷ Royal Town Planning Institute (2007) *Gender and Spatial Planning: Good Practice Note 7*, 10 December 2007.

"The use of women in degrading entertainment exacerbates violence against women...lap dancing and similar clubs must be regulated to ensure that local violence against women do not increase"

FACT FIVE: Lap dancing clubs have a negative impact on women's safety in wider society

Lap dancing clubs normalise the representation of women as sexual objects who are always sexually available. They make sexual harassment seem normal, as what takes place within the four walls of a lap dancing club would be considered harassment in any other context.

The links between objectification, discrimination and violence against women are recognised at the international level by the legally binding **United Nations Convention to Eliminate Discrimination Against Women (CEDAW)**, which has repeatedly called on states – including the British Government – to take action against the objectification of women⁸.

Similarly the UK-based **End Violence Against Women coalition** has called on the UK Government to tackle the sexualisation of women and girls because it provides a 'conducive context' for violence against women⁹.

The links between the expansion of lap dancing clubs and an increase in the levels of sexual violence in society was raised by **Glasgow City Council**¹⁰ in response to research it commissioned into the impact of lap dancing clubs on the city:

"Language of women and entertainments which demean and degrade women, portraying them as sexual objects provide a perfect environment for sexual violence and contribute to male access of women being a workplace, at work, at home and sexual. Such entertainment can contribute to sexual violence by a range of means, public and voluntary, as well as by promoting women's equality."

⁸ 1979 Convention on All Forms of Discrimination Against Women (CEDAW) Article 5

⁹ Realising Rights, Fulfilling Obligations: An Integrated Strategy to End Violence Against Women (EVAW) 2008

¹⁰ Glasgow City Council report on the need for review of licensing legislation in the light of concerns re table dancing <http://www.glasgow.gov.uk/handle/1753/1195/1/CD13236F-009A-4457-95F7-6A9528C1F3120?eqtablic2.pdf>

FACT SIX: Lap dancing clubs run counter to efforts to promote equality between women and men

The **Gender Equality Duty 2007** requires local councils to assess the gendered impact that lap dancing clubs have on society as a whole.

The lap dancing industry is highly gendered, with men paying women to strip for them in the vast majority of lap dancing clubs - otherwise known as 'gentlemen's clubs'. The gendered nature of the industry makes the proliferation of lap dancing clubs relevant to the Gender Equality Duty making gender equality a factor which should be considered during licensing process.

The ever-increasing sexual objectification of women, facilitated by the expansion of lap dancing clubs, runs directly counter to efforts to achieve equality between women and men.

The more it becomes acceptable to view and treat women as sexual objects, the easier it becomes to disrespect women as a group. As stated by Chris Green, Director of the **White Ribbon Campaign**¹¹:

"Every expansion of lap dancing clubs serves as a message in the fact of respect. The message?"

Research into male motivations for visiting strip clubs found that men went to strip clubs to meet women who were not 'feminist' and who were willing to act in more 'traditional' ways¹². This is reflected by **testimonies from former lap dancers**¹³:

"I learned that the best way to encourage a man to return from the kitchen for him to ask you, 'submit to me, please and thank you!'"

Male customers also said that they wanted to 'let frustration out' at the ways in which they had been forced to monitor their behaviour towards women in the workplace¹⁴:

¹¹ The White Ribbon Campaign works with men to end violence against women
¹² Frank, K. (2005) 'Exploring the Motivations and Fantasies of Strip Club Customers in Relation to Legal Regulations', *Sexual Behavior*, Vol. 34 (5), pp. 487 – 504
¹³ See OBJECT website for more testimonies
¹⁴ Frank, K. (2005) 'Exploring the Motivations and Fantasies of Strip Club Customers in Relation to Legal Regulations', *Sexual Behavior*, Vol. 34 (5), pp. 487 – 504

"With all of this sexual harassment stuff going around these days, men need somewhere to go where they can act like they want"

In this way, lap dancing clubs represent one of the last bastions of male privilege - a place that time forgot in relation to society's efforts to achieve equality between women and men.

Recent sex discrimination law suits against corporate use of lap dancing clubs, and **top business women in *The Economist*¹⁵ blaming corporate strip club culture for the lack of female representation at high levels of business** demonstrate the negative impact that lap dancing clubs have on women's equality in wider society. According to a female business woman in the UK¹⁶:

"Often about after-work meetings increase visits to strip clubs and I know senior guys who had lots of 'fluff' (what's a new fluff or foam member and that she must be slim, blond and a little sexy) guy around to work with him because the white business world is holding and maintaining themselves together and it had some sort of thing to provide that"

The *Sexism in the City* campaign spearheaded by the **Fawcett Society**, the UK's leading campaign for gender equality, further highlights the links between lap dancing and gender inequality as it calls on government and business to take steps to end commercial sexual exploitation, sexual objectification and sexual stereotypes as crucial measures to achieve equality between women and men in the work place¹⁷.

FACT SEVEN: Regulating the expansion of lap dancing clubs is an issue of equality, not morality

Objections to lap dancing clubs are based on issues of equality, not morality.

The need for policy to be scrutinised in relation to gender equality was recognised by the Government in 2007, with the passing of the **Gender Equality Duty**. The Gender Equality Duty places a legal obligation on public bodies to take out **Gender Equality Impact Assessments** on all policy decisions to ensure that decisions do not have a negative impact on women's equality. Furthermore, the Gender Equality Duty requires public bodies to **actively promote gender equality and work towards countering gender stereotypes**.

¹⁵ Jeffreys, S. (2006b) 'The Sex Industry and Business Practice', Seminar: School of Business, Ballara University, 21 May 2008

¹⁶ Kate, Former City of London worker, Sexism and the City Manifesto, Fawcett Society 2008

¹⁷ <http://www.fawcettsociety.org.uk/documents/SATC%20manifesto%20public.pdf>

Lap dancing clubs promote gender stereotypes and attitudes that say it is acceptable to treat women as sexual objects, rather than real people. They are linked to gender discrimination and sexual harassment in the workplace (as demonstrated by recent successes of sexual harassment cases in which use of lap dancing clubs has been recognised as linked to discrimination) as well as the creation of no go areas in the surrounding areas which reduce women's sense of security and entitlement to public space.

Highlighting these issues is not about morality, or 'having an issue with sex', it is about ensuring that local councils abide by their legal requirements to promote equality between women and men.

FACT EIGHT: The Policing and Crime Act 2009 allows councils to set a limit of zero for Sexual Entertainment Venues. This means rejecting all licensing applications for lap dancing clubs.

The **Policing and Crime Act 2009** allows local authorities to regulate lap dancing clubs by setting a limit on how many Sexual Entertainment Venues can be licensed in each ward – and therefore in the borough as a whole. The limit may be set at nil.

It is explicitly provided in the Local Government (Sexual Entertainment Venues) Regulations 2010 that a council may set an appropriate limit for the number of sex-related premises to be licensed in a ward.

All current lap dancing clubs must apply for a Sexual Entertainment Venue license in order to operate. Licenses last for a duration of one year.

A local authority is under no obligation to renew a license for a currently operating club under the Sexual Entertainment Venue licensing regime. If a local authority sets a 'nil policy' / a limit of zero, this will automatically allow the council to reject all licensing applications for Sexual Entertainment Venues. This is an important part of the new licensing regime in relation to lap dancing clubs considering the negative impact that lap dancing clubs have on local communities and in particular on women's equality and women's safety (see above).

Indeed, **the introduction of a nil policy is currently being proposed by the London Boroughs of Hackney and Haringey**. In the view of Hackney council⁷:

"...[Sexual Entertainment Venues] contradict and undermine [the Borough of Hackney's] stated aims and exacerbate the challenges it faces in bringing about positive, genuine, sustainable characterful and thriving neighbourhoods which support the need and principle of upskilling the population and closing the education gap across its communities."

⁷ Hackney Draft: Sex Establishment: Licensing Policy, 2010

And in Harringey, Councillor Nilgun Canver states¹⁹:

"This new legislation allows us to stop lap dancing and pole dancing clubs from setting up in sensitive areas where they will cause concern. We consider this would apply to every ward and wants this to be central to our policy. We are asking for comments from residents, to see if they support this stance."

FACT NINE: Introducing a 'nil' policy/zero limit for Sexual Entertainment Venues and therefore rejecting licensing applications for lap dancing clubs is fully compliant with the Human Rights Act

Some lap dancing club operators have threatened to appeal against the rejection of a Sexual Entertainment Venue (SEV) licence on the grounds that it violates their human rights under the Human Rights Act 1998. The two rights they threaten to invoke are the *right to freedom of expression* and the *protection of property*.

It is extremely unlikely that such an appeal would be successful considering that it is within the law for councils to set nil policies (see FACT SEVEN)

Furthermore, the two rights specified above are qualified, they are not absolute.

Philip Kolvin QC, Chairman of the Institute of Licensing, states²⁰:

"Where a rational justification can be shown by the licensing authority the interference with the rights of the club is, in most instances, justified. The great majority of the cases will be found to have been a disproportionate interference with the club's human rights."

Indeed, before the Policing and Crime Bill became law – enabling local authorities to licence lap dancing clubs as Sexual Entertainment Venues under the LGMPA - the **Minister of the Crown** in charge of the Bill made a **written statement that the new law, including the provision to set nil policies, was compatible with the Human Rights Act 1998.**

Thus the power of local authorities to set a nil policy for Sexual Entertainment Venue licenses has been validated in human rights terms.

Rejecting a lap dancing club licence application – and/or setting a nil policy for lap dancing clubs – is therefore fully compliant with the Human Right Act 1998.

¹⁹ http://www.haringey.gov.uk/index/news_and_events/latest_news/lap_dancing_ban.htm

²⁰ Kolvin, P. (2010) *Sex Licensing*, The Institute of Licensing, p82

FACT TEN: The current coalition government supports moves to tackle businesses which promote the sexual objectification of women, including lap dancing clubs, as part of their work on violence against women

The current **Home Secretary, Theresa May**, sent a powerful message to councils to take a bold stance against businesses which promote the sexual objectification of women when, in July 2010 at the Women's Aid Conference, she stated:

"It is only when businesses are held to their responsibility to end the sexualisation of women that some people will stop treating women like objects. And it's only when our communities stand up and say violence against women is unacceptable – that attitudes will really begin to change".

The **Conservative Violence Against Women and Girls Strategy for London (2010 - 2013)** explicitly refers to the links between lap dancing clubs, prostitution, trafficking and other forms of violence against women²¹.

The Conservative Mayor for London, **Boris Johnson**, further states his support for councils to take tough measures against the proliferation of lap dancing clubs:

"The proliferation of lap dancing clubs and venues is a further indication of a lack of respect for women and our women's work. We will ensure that the sector can be regulated by a licensing regime which is robust, fair and effective. We will work with local authorities and police partners through the Mayor's Local Authority Partnership and ensure that the new licensing regime under the Planning and Crime Act 2009 ensures the London-wide way of regulating the sector can be applied across all local councils and government remains the same. We will ensure that clubs in their areas will support licensing by ensuring that the proliferation of lap dancing clubs is controlled. We will also champion any police operations that target lap dancing clubs for law-abiding, responsible and cultural activities".

And the Leader of the opposition, **Ed Miliband**, states his support for OBJECT and urges councils to adopt strong measures to tackle the growth of lap dancing clubs as part of tackling the attitudes and behaviours that underpin violence against women²²:

²¹ <http://www.london.gov.uk/sites/default/files/The%20CW%20Forward%20Final%20S%20Strategy.pdf>

²² Ed Miliband's response to the End Violence Against Women Coalition, September 2010, <http://www.endviolenceagainstwomen.org.uk>

"We need to think about how our culture treats women more generally. The vital work of organisations such as OBJECT has exposed the ease with which lap dancing clubs have sprung up. In government we took some steps to enforce stricter controls on these establishments, but we were too slow to recognise this problem and act on it. I have already stated that I want real people to have more power to challenge the tenets of these establishments."

There is cross-party support for tackling the growth of lap dancing clubs.

Councils across the country are adopting the SEV licensing laws and considering setting the limit at zero.

You too can be part of stemming the sexualisation of women and girls by taking a stand against the 'sex-object' culture that lap dancing clubs promote.

Take action now and help end commercial sexual exploitation for generations to come.

To find out more email OBJECT at anna@object.org.uk or visit our website at:

object.org.uk