

Appendix D

Representations

Licensing Service
Block C, Staniforth Road Depot
Staniforth Road
Surrey Street
S9 3HD
By email to: licensing@sheffield.gov.uk

30/04/2018

Dear Licensing

Objection to Spearmint Rhino licence renewal

I refer to the application for a sex establishment licence by Spearmint Rhino ("the club"), 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 2018 Sex Establishment Policy ("the Policy") on the following grounds:

Discretionary Ground d)

i) Character of the relevant locality

(a) the fact that the premises are sited in a residential area;

The club backs onto student accommodation and the area is increasingly becoming more residential for students and non-students alike.

The city centre's residential population had risen from 6,000 to 30,000 over the last 10 yearsⁱ with further plans for more residential accommodation within the Cultural Industries Quarter (CIQ) and Knowledge Gateway. Furthermore, "the Alsop Fields development is a mix of residential apartments, studios, offices for the high-tech and creative sectors and places to eat and drink" and "... designed to be a destination in itself – a regeneration of part of the Cultural Industries Quarter that will be similar to the trendy parts of Manchester and London"ⁱⁱ for which Brown Street and Paternoster Row are the main thoroughfares.

(d) the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families, including but not limited to educational establishments, leisure facilities such as parks, libraries or swimming pools, markets and covered markets;

The Showroom and adjacent Work Station are frequented by families and both host events specifically for children including the world renown Children's Media Conference.

(e) the premises are sited near places and or buildings of historical/cultural interest and other tourist attractions.

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."

It is also opposite the Site Gallery which has just undergone a huge expansion. This includes significant investment from the Arts Council and SCC so it seems ridiculous to jeopardise Site's potential attractiveness with this sexist and misogynistic operation just across the road. 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 aforementioned Children's Media Conference; Off the Shelf etc all of which are tourist attractions.

The club is next to Sheffield Hallam Students Union (an iconic and a city landmark building).

ii) Use of other premises in the vicinity

The Licensing Authority will have regard to, but not limited to, the following:

(a) schools, nurseries or other premises substantially used by or for children under 18 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 which provides education for 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 at the epicentre of the designated "Knowledge Gateway" and located on Sheffield Hallam University's city campus whose masterplan is to further develop the area which includes "new buildings for the Business School and social sciences, refurbishing the Students' Union building known as The HUBS, creating a University Green [Festival/CIQ Square] and improving our current estate."ⁱⁱⁱ

(b) parks or other recreational areas designed for use by or for children under 18 years of age;

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) is directly adjacent to the club and the club's presence is holding back further use and development of this space into its full potential.

(c) hospitals, mental health or disability centres, substance misuse treatment centres, sexual exploitation services, sexual abuse centres or similar premises;

There are a number of charities and organisations in the area which support vulnerable children, young people and adults, one of which is situated directly behind the club. Charles Street is a direct access route from the bus stop on Arundel Gate and the car park on Arundel Street; direct access from both means that service users pass directly past the club through the unused and desolate Festival/CIQ Square.

(d) any central gateway to the city or other city landmark, historic building or tourist attraction;

See (e) under (i).

(f) predominately residential areas;

See (a) under (i)

(g) The Cultural Hub (Millennium Galleries, Tudor Square, theatres and library).

The location of the club is a de facto "cultural hub" given it is named the Cultural Industries Quarter. It is also on the direct access route to the 24/7 Addsetts learning centre from numerous student accommodation blocks in the immediate vicinity, which many will be accessing during the club's opening hours.

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

The building, despite the removal of signage during its closed hours, is a blacked out sinister presence incongruous with its surroundings and clearly marked buildings. Removal of the signage is “a sticking plaster to a gaping wound” approach by Licensing. Regardless of whether the club’s signage is visible in the day, it is widely known what the building is. Those who are not familiar with the building’s use visiting SHU on open days and viewing properties in the vicinity during the day will be unable to make an informed decision about moving into an area with a sex establishment on the doorstep.

Furthermore, the building could be put to a different use serving a far more diverse and greater number of people thereby enriching the CIQ in a far more inclusive and compatible way.

Further grounds for refusal

The Public Sector Equality Duty and Gender Equality

The Policy states under the heading “The Equality Act 2010”:

This Act legally protects people from discrimination in the workplace and wider society. This includes the Public Sector Equality Duty (PSED), which means that the Council must thoroughly consider, in the discharge

of its licensing functions, the need to:

- promote equality of opportunity;
- eliminate unlawful discrimination, harassment and victimisation;
- promote good relations.

This applies for this policy and to the consideration and determination of applications for sex establishments. (p.5)

I believe that sex establishments such as Spearmint Rhino directly discriminate against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. A 2016 review highlights how these venues undermine women’s equality:

“Thus, in objectifying media women’s role as a source of male sexual pleasure is emphasized and their humanity is deemphasized. After having internalized the messages of male sexual privilege and female dehumanization, it should be easier for men to envision imposing themselves sexually on women and reacting punitively to women who frustrate their sexual goals.”^{iv}

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 sex establishments to be licensed in specific areas – subject to the choices of the local communities.

The Policy further states that:

Licences will be refused if the Licensing Authority perceives a venue will have negative impacts on members of the public or vulnerable persons living, working or engaged in normal activity in the area.

Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections, including LGBT women and disabled women. In 2017, many examples of the negative impact of this club were given in objections, for example: one woman giving up her studio at Yorkshire Artspace and a contributory factor was the presence of the club and “running the gauntlet of men

hanging around outside the club and harassing women.” (objection 12) and others have stated how the club impacts on their business at hearings and in writing.^v

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”^{vi}

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”^{vii}.

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.”^{viii}

In addition to an Australian article about women and girls’ perceptions of safety in urban spaces highlights how they restrict their freedom of movement to avoid zones where there are strip clubs.^{ix}

Lap dancing clubs also reinforce negative 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 2016 by Zero Option at the Villa Mercedes hearing representation and its 2017 oral representation at the hearing^x.

In their UK study published in 2011 Sanders and Hardy^{xi} 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 many testimonies of former performers.

The Policy states that “The Licensing Authority will also consider the following factors when deciding if an application is appropriate”:

.b) proximity to areas with high levels of crime;

On 22nd February 2018, it was reported in the Star that Arundel Gate which runs in parallel to Paternoster Row and is approximately 1-2 minutes on foot away depending on walking pace, is 10th in the top 10 areas of crime in the city and that “These offences, including assaults, robberies and sex attacks on women, were recorded between January and November 2017.”^{xii}

This image of a high-end establishment portrayed by this club 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 Committee 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.”^{xiii}

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.

According to the BBC, lap dancing clubs have fallen by a third in England^{xiv}. The same report states that “a survey conducted by YouGov in 2015 found 64% of people in Great Britain said strip clubs were a negative part of British culture.” I ask that the Committee refuses to grant the club a licence for all the reasons outlined and because Spearmint Rhino is anachronistic, it gives Sheffield and our much vaunted CIQ a negative image and may deter investors and developers. At a time when we are hoping to attract large investors and are bidding for Channel 4 to relocate in the vicinity, the Committee needs to turn down this licence application, which it is empowered to do.

I look forward to hearing from you.

References

ⁱSheffield Star 16th January 2018 *Dramatic rise in the number of people living in Sheffield city centre* Available from: <https://www.thestar.co.uk/news/dramatic-rise-in-the-number-of-people-living-in-sheffield-city-centre-1-8960059>

ⁱⁱSheffield Chamber of Commerce *Sheffield's Cultural Industries Quarter expansion in £10m City Estates project* Available from: <https://www.scci.org.uk/2017/03/sheffields-cultural-industries-quarter-expansion-in-10m-city-estates-project/>

ⁱⁱⁱSheffield Hallam University 22nd February 2018 *New campus masterplan places Hallam at the heart of the city* Available from: <http://www4.shu.ac.uk/mediacentre/new-campus-masterplan-places-hallam-heart-city>

^{iv}Wright, P.J & Tokunaga, R.S (2016) Men's Objectifying Media Consumption, Objectification of Women, and Attitudes Supportive of Violence Against Women in *Archives of Sexual Behavior*

^v*Zero Option oral representation at the Spearmint Rhino hearing April 2017* Available from: <https://zerooptionblog.wordpress.com/2017/04/14/zero-options-representation-at-the-spearmint-rhino-licence-renewal-hearing-11th-april-2017/#more-524>

^{vi}Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

^{vii}Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

^{viii}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.

^{ix}Safe in the City? Girls tell it like it is. March 26, 2017 <https://theconversation.com/safe-in-the-city-girls-tell-it-like-it-is-72975>.

^x Slideshare available from: <https://www.slideshare.net/ZerooptionSheffield/villa-mercedes-hearing-8th-september-2016>

^{xi} Sanders, T., & Hardy, K. (2011) *The Regulatory Dance: Sexual Consumption in the Night Time Economy – Initial Findings*. Leeds: University of Leeds

^{xii} Sheffield Star 22nd February 2018 Available from: <https://www.thestar.co.uk/news/listed-these-are-the-10-most-crime-ridden-streets-in-sheffield-1-9030246>

^{xiii} Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.90

^{xiv} 23rd February 2018 Available from: <http://www.bbc.co.uk/news/uk-england-43043842>

Gough Jayne (CEX)

From: [Redacted]
Sent: 30 April 2018 15:34
To: licensingservice
Subject: Objection to Spearmint Rhino Licence Renewal

30th April 2018

Dear Licensing,

Objection to Spearmint Rhino licence renewal

I refer to the application for a sex establishment licence by Spearmint Rhino (“the club”), 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 2018 Sex Establishment Policy (“the Policy”) on the following grounds:

Discretionary Ground d)

i) Character of the relevant locality

- 1. the fact that the premises are sited in a residential area;**

The club backs onto student accommodation and the area is increasingly becoming more residential for students and non-students alike.

The city centre's residential population had risen from 6,000 to 30,000 over the last 10 yearsⁱ with further plans for more residential accommodation within the Cultural Industries Quarter (CIQ) and Knowledge Gateway. Furthermore, “the Alsop Fields development is a mix of residential apartments, studios, offices for the high-tech and creative sectors and places to eat and drink” and “. . . designed to be a destination in itself – a regeneration of part of the Cultural Industries Quarter that will be similar to the trendy parts of Manchester and London”ⁱⁱ for which Brown Street and Paternoster Row are the main thoroughfares.

- (d) the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families, including but not limited to educational**

establishments, leisure facilities such as parks, libraries or swimming pools, markets and covered markets;

The Showroom and adjacent Work Station are frequented by families and both host events specifically for children including the world renown Children's Media Conference.

(e) the premises are sited near places and or buildings of historical/cultural interest and other tourist attractions.

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."

It is also opposite the Site Gallery which has just undergone 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 aforementioned Children's Media Conference; Off the Shelf etc all of which are tourist attractions.

The club is next to Sheffield Hallam Students Union (an iconic and a city landmark building).

ii) Use of other premises in the vicinity

The Licensing Authority will have regard to, but not limited to, the following:

(a) schools, nurseries or other premises substantially used by or for children under 18 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 which provides education for 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 at the epicentre of the designated "Knowledge Gateway" and located on Sheffield Hallam University's city campus whose masterplan is to further develop the area which includes "new buildings for the Business School and social sciences, refurbishing the Students' Union building known as The HUBS, creating a University Green [Festival/CIQ Square] and improving our current estate."iii

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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) is directly adjacent to the club and the club's presence is holding back further use and development of this space into its full potential.

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There are a number of charities and organisations in the area which support vulnerable children, young people and adults, one of which is situated directly behind the club. Charles Street is a direct access route from the bus stop on Arundel Gate and the car park on Arundel Street; direct access from both means that service users pass directly past the club through the unused and desolate Festival/CIQ Square.

(d) any central gateway to the city or other city landmark, historic building or tourist attraction;

See (e) under (i).

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(g) The Cultural Hub (Millennium Galleries, Tudor Square, theatres and library).

The location of the club is a de facto “cultural hub” given it is named the Cultural Industries Quarter. It is also on the direct access route to the 24/7 Addsetts learning centre from numerous student accommodation blocks in the immediate vicinity, which many will be accessing during the club’s opening hours.

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The building, despite the removal of signage during its closed hours, is a blacked out sinister presence incongruous with its surroundings and clearly marked buildings. Removal of the signage is “a sticking plaster to a gaping wound” approach by Licensing. Regardless of whether the club’s signage is visible in the day, it is widely known what the building is. Those who are not familiar with the building’s use visiting SHU on open days and viewing properties in the vicinity during the day will be unable to make an informed decision about moving into an area with a sex establishment on the doorstep.

Furthermore, the building could be put to a different use serving a far more diverse and greater number of people thereby enriching the CIQ in a far more inclusive and compatible way.

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of its licensing functions, the need to:

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I believe that sex establishments such as Spearmint Rhino directly discriminate against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. A 2016 review highlights how these venues undermine women's equality:

"Thus, in objectifying media women's role as a source of male sexual pleasure is emphasized and their humanity is deemphasized. After having internalized the messages of male sexual privilege and female dehumanization, it should be easier for men to envision imposing themselves sexually on women and reacting punitively to women who frustrate their sexual goals."iv

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The Policy further states that:

Licences will be refused if the Licensing Authority perceives a venue will have negative impacts on members of the public or vulnerable persons living, working or engaged in normal activity in the area.

Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections, including LGBT women and disabled women. In 2017, many examples of the negative impact of this club were given in objections, for example: one woman giving up her studio at Yorkshire Artspace and a contributory factor was the presence of the club and "running the gauntlet of men hanging around outside the club and harassing women." (objection 12) and others have stated how the club impacts on their business at hearings and in writing.v

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

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” vii.

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.”viii

In addition to an Australian article about women and girls’ perceptions of safety in urban spaces highlights how they restrict their freedom of movement to avoid zones where there are strip clubs.ix

Lap dancing clubs also reinforce negative 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 2016 by Zero Option at the Villa Mercedes hearing representation and its 2017 oral representation at the hearingx.

In their UK study published in 2011 Sanders and Hardy xireported 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 many testimonies of former performers.

The Policy states that “The Licensing Authority will also consider the following factors when deciding if an application is appropriate”:

(b) proximity to areas with high levels of crime;

On 22nd February 2018, it was reported in the Star that Arundel Gate which runs in parallel to Paternoster Row and is approximately 1-2 minutes on foot away depending on walking pace, is 10th in the top 10 areas of crime in the city and that “These offences, including assaults, robberies and sex attacks on women, were recorded between January and November 2017.”xii

This image of a high-end establishment portrayed by this club 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 Committee 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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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.

According to the BBC, lap dancing clubs have fallen by a third in Englandxiv. The same report states that “a survey conducted by YouGov in 2015 found 64% of people in Great Britain said strip clubs were a negative part of British culture.” I ask that the Committee refuses to grant the club a licence for all the reasons outlined and because Spearmint Rhino is anachronistic, it gives Sheffield and our much vaunted CIQ a negative image and may deter investors and developers. At a time when we are hoping to attract large investors and are bidding for Channel 4 to relocate in the vicinity, the Committee needs to turn down this licence application, which it is empowered to do.

I am no longer formally resident in Sheffield but I lived there for over 20 years and still have a base there. I am a regular both for professional purposes and to visit friends and family. I do not want the city to be responsible for the commodification of women.

Yours faithfully,











References

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- i Sheffield Star 16th January 2018 *Dramatic rise in the number of people living in Sheffield city centre* Available from: <https://www.thestar.co.uk/news/dramatic-rise-in-the-number-of-people-living-in-sheffield-city-centre-1-8960059>
- ii Sheffield Chamber of Commerce *Sheffield's Cultural Industries Quarter expansion in £10m City Estates project* Available from: <https://www.scci.org.uk/2017/03/sheffields-cultural-industries-quarter-expansion-in-10m-city-estates-project/>
- iii Sheffield Hallam University 22nd February 2018 *New campus masterplan places Hallam at the heart of the city* Available from: <http://www4.shu.ac.uk/mediacentre/new-campus-masterplan-places-hallam-heart-city>
- iv Wright, P.J & Tokunaga, R.S (2016) Men's Objectifying Media Consumption, Objectification of Women, and Attitudes Supportive of Violence Against Women in *Archives of Sexual Behavior*
- v *Zero Option oral representation at the Spearmint Rhino hearing April 2017* Available from: <https://zerooptionblog.wordpress.com/2017/04/14/zero-options-representation-at-the-spearmint-rhino-licence-renewal-hearing-11th-april-2017/#more-524>
- vi Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87
- vii Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87
- viii 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.
- ix Safe in the City? Girls tell it like it is. March 26, 2017 <https://theconversation.com/safe-in-the-city-girls-tell-it-like-it-is-72975>.
- x Slideshare available from: <https://www.slideshare.net/ZerooptionSheffield/villa-mercedes-hearing-8th-september-2016>
- xi Sanders, T., & Hardy, K. (2011) *The Regulatory Dance: Sexual Consumption in the Night Time Economy – Initial Findings*. Leeds: University of Leeds
- xii Sheffield Star 22nd February 2018 Available from: <https://www.thestar.co.uk/news/listed-these-are-the-10-most-crime-ridden-streets-in-sheffield-1-9030246>
- xiii Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.90
- xiv 23rd February 2018 Available from: <http://www.bbc.co.uk/news/uk-england-43043842>

Gough Jayne (CEX)

From: [REDACTED]
Sent: 30 April 2018 15:40
To: licensingservice
Subject: Objection to renewal of Spearmint Rhino

29/04/2018

Dear Licensing

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Council's 2018 Sex Establishment Policy ("the Policy") on the following grounds:

Discretionary Ground d)

i) Character of the relevant locality

(a) the fact that the premises are sited in a residential area;

White Ribbon UK is the largest organisation working with men and young men to challenge violence against women and girls. Hull University and Anglia Ruskin University are fully accredited to White Ribbon. They and other university authorities recognise the importance of ensuring a safe local environment for students. The club backs onto student accommodation and the area is increasingly becoming more residential for students and non-students alike.

The city centre's residential population had risen from 6,000 to 30,000 over the last 10 years with further plans for more residential accommodation within the Cultural Industries Quarter (CIQ) and Knowledge Gateway. Furthermore, "the Alsop Fields development is a mix of residential apartments, studios, offices for the high-tech and creative sectors and places to eat and drink" and ". . . designed to be a destination in itself – a regeneration of part of the Cultural Industries Quarter that will be similar to the trendy parts of Manchester and London" for which Brown Street and Paternoster Row are the main thoroughfares.

White Ribbon has a number of music and creative industry venues fully accredited because the hear organisations see the need to take positive steps to challenge inappropriate messaging about women including the commodification of women .

(d)the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families, including but not limited to educational establishments, leisure facilities such as parks, libraries or swimming pools, markets and covered markets;

The Showroom and adjacent Work Station are frequented by families and both host events specifically for children including the world renowned Children's Media Conference.

(e) the premises are sited near places and or buildings of historical/cultural interest and other tourist attractions.

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."

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The club is next to Sheffield Hallam Students Union (an iconic and a city landmark building).

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The club is also at the epicentre of the designated "Knowledge Gateway" and located on Sheffield Hallam University's city campus whose masterplan is to further develop the area which includes "new buildings for the Business School and social sciences, refurbishing the Students' Union building known as The HUBS, creating a University Green [Festival/CIQ Square] and improving our current estate."

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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) is directly adjacent to the club and the club's presence is holding back further use and development of this space into its full potential.

(c) hospitals, mental health or disability centres, substance misuse treatment centres, sexual exploitation services, sexual abuse centres or similar premises;

There are a number of charities and organisations in the area which support vulnerable children, young people and adults, one of which is situated directly behind the club. Charles Street is a direct access route from the bus stop on Arundel Gate and the car park on Arundel Street; direct access from both means that service users pass directly past the club through the unused and desolate Festival/CIQ Square.

(d) any central gateway to the city or other city landmark, historic building or tourist attraction;

See (e) under (i).

(f) predominately residential areas;

See (a) under (i)

(g)The Cultural Hub (Millennium Galleries, Tudor Square, theatres and library).

The location of the club is a de facto “cultural hub” given it is named the Cultural Industires Quarter. It is also on the direct access route to the 24/7 Addsetts learning centre from numerous student accommodation blocks in the immediate vicinity, which many will be accessing during the club’s opening hours.

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

The building, despite the removal of signage during its closed hours, is a blacked out sinister presence incongruous with its surroundings and clearly marked buildings. Removal of the signage is “a sticking plaster to a gaping wound” approach by Licensing. Regardless of whether the club’s signage is visible in the day, it is widely known what the building is. Those who are not familiar with the building’s use visiting SHU on open days and viewing properties in the vicinity during the day will be unable to make an informed decision about moving into an area with a sex establishment on the doorstep.

Furthermore, the building could be put to a different use serving a far more diverse and greater number of people thereby enriching the CIQ in a far more inclusive and compatible way.

Further grounds for refusal

The Public Sector Equality Duty and Gender Equality

The Policy states under the heading “The Equality Act 2010”:

This Act legally protects people from discrimination in the workplace and wider society. This includes the Public Sector Equality Duty (PSED), which means that the Council must thoroughly consider, in the discharge of its licensing functions, the need to:

- promote equality of opportunity;
- eliminate unlawful discrimination, harassment and victimisation;
- promote good relations.

This applies for this policy and to the consideration and determination of applications for sex establishments. (p.5)

I believe that sex establishments such as Spearmint Rhino directly discriminate against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. A 2016 review highlights how these venues undermine women’s equality:

“Thus, in objectifying media women’s role as a source of male sexual pleasure is emphasized and their humanity is deemphasized. After having internalized the messages of male sexual privilege and female dehumanization, it should be easier

for men to envision imposing themselves sexually on women and reacting punitively to women who frustrate their sexual goals.”

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 sex establishments to be licensed in specific areas – subject to the choices of the local communities.

The Policy further states that:

Licences will be refused if the Licensing Authority perceives a venue will have negative impacts on members of the public or vulnerable persons living, working or engaged in normal activity in the area.

Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections, including LGBT women and disabled women. In 2017, many examples of the negative impact of this club were given in objections, for example: one woman giving up her studio at Yorkshire Artspace and a contributory factor was the presence of the club and “running the gauntlet of men hanging around outside the club and harassing women.” (objection 12) and others have stated how the club impacts on their business at hearings and in writing.

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

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

Kolvin continues with:

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

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

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

In addition to an Australian article about women and girls’ perceptions of safety in urban spaces highlights how they restrict their freedom of movement to avoid zones where there are strip clubs.

Lap dancing clubs also reinforce negative 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 2016 by Zero Option at the Villa Mercedes hearing representation and its 2017 oral representation at the hearing. In their UK study published in 2011 Sanders and Hardy 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 many testimonies of former performers.

The Policy states that “The Licensing Authority will also consider the following factors when deciding if an application is appropriate”:

(b) proximity to areas with high levels of crime;

On 22nd February 2018, it was reported in the Star that Arundel Gate which runs in parallel to Paternoster Row and is approximately 1-2 minutes on foot away depending on walking pace, is 10th in the top 10 areas of crime in the city and that “These offences, including assaults, robberies and sex attacks on women, were recorded between January and November 2017.”

This image of a high-end establishment portrayed by this club 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 Committee 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.

According to the BBC, lap dancing clubs have fallen by a third in England. The same report states that “a survey conducted by YouGov in 2015 found 64% of people in Great Britain said strip clubs were a negative part of British culture.”

I ask that the Committee refuses to grant the club a licence for all the reasons outlined and because Spearmint Rhino is anachronistic, it gives Sheffield and our much vaunted CIQ a negative image and may deter investors and developers. At a time when we are hoping to attract large investors and are bidding for Channel 4 to relocate in the vicinity, the Committee needs to turn down this licence application, which it is empowered to do.

I look forward to hearing from you.

(Equality)

Bower Claire

From: [redacted] <[redacted]>
Sent: 30 April 2018 20:58
To: licensingservice
Subject: Objection to Spearmint Rhino licence renewal

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: SPEARMINT RHINO

Licensing Service

Block C, Staniforth Road Depot

Staniforth Road

Surrey Street

S9 3HD

By email to: licensingservice@sheffield.gov.uk

30.4.18

Dear Licensing

Objection to Spearmint Rhino licence renewal

I refer to the application for a sex establishment licence by Spearmint Rhino ("the club"), 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 2018 Sex Establishment Policy ("the Policy") on the following grounds:

Discretionary Ground d)

i) Character of the relevant locality

- 1. the fact that the premises are sited in a residential area;**

The club backs onto student accommodation and the area is increasingly becoming more residential for students and non-students alike.

The city centre's residential population had risen from 6,000 to 30,000 over the last 10 years with further plans for more residential accommodation within the Cultural Industries Quarter (CIQ) and

Knowledge Gateway. Furthermore, “the Alsop Fields development is a mix of residential apartments, studios, offices for the high-tech and creative sectors and places to eat and drink” and “. . . designed to be a destination in itself – a regeneration of part of the Cultural Industries Quarter that will be similar to the trendy parts of Manchester and London”ⁱⁱ for which Brown Street and Paternoster Row are the main thoroughfares.

(d) the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families, including but not limited to educational establishments, leisure facilities such as parks, libraries or swimming pools, markets and covered markets;

The Showroom and adjacent Work Station are frequented by families and both host events specifically for children including the world renown Children’s Media Conference.

(e) the premises are sited near places and or buildings of historical/cultural interest and other tourist attractions.

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.”

It is also opposite the Site Gallery which has just undergone 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 aforementioned Children’s Media Conference; Off the Shelf etc all of which are tourist attractions.

The club is next to Sheffield Hallam Students Union (an iconic and a city landmark building).

ii) Use of other premises in the vicinity

The Licensing Authority will have regard to, but not limited to, the following:

(a) schools, nurseries or other premises substantially used by or for children under 18 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 which provides education for 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 at the epicentre of the designated “Knowledge Gateway” and located on Sheffield Hallam University’s city campus whose masterplan is to further develop the area which includes “new buildings for the Business School and social sciences, refurbishing the Students’ Union building known as The HUBS, creating a University Green [Festival/CIQ Square] and improving our current estate.”ⁱⁱⁱ

(b) parks or other recreational areas designed for use by or for children under 18 years of age;

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"Thus, in objectifying media women's role as a source of male sexual pleasure is emphasized and their humanity is deemphasized. After having internalized the messages of male sexual privilege and female dehumanization, it should be easier for men to envision imposing themselves sexually on women and reacting punitively to women who frustrate their sexual goals."iv

My sister, Jill Seward, prior to her death, was instrumental in changing the law for women, victims of crime and those who have been abused and raped, by men who thought nothing of women.

Sheffield, like other cities, has been facing all kinds of bad publicity for the crime and depravity – and I for one have no desire to visit a city whilst you allow places like this to exist and encourage men to act in such ways.

Last year, I asked you not to allow the granting of this license again, but my comments like many others were ignored. Come on Council, clean up your act. This is the twenty first century and there is no need for places like this.

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 sex establishments to be licensed in specific areas – subject to the choices of the local communities.

The Policy further states that:

Licences will be refused if the Licensing Authority perceives a venue will have negative impacts on members of the public or vulnerable persons living, working or engaged in normal activity in the area.

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Kolvin continues with:

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

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.”viii

In addition to an Australian article about women and girls’ perceptions of safety in urban spaces highlights how they restrict their freedom of movement to avoid zones where there are strip clubs.ix

Lap dancing clubs also reinforce negative 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 2016 by Zero Option at the Villa Mercedes hearing representation and its 2017 oral representation at the hearingx.

In their UK study published in 2011 Sanders and Hardy xireported 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 many testimonies of former performers.

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10th in the top 10 areas of crime in the city and that “These offences, including assaults, robberies and sex attacks on women, were recorded between January and November 2017.”^{xii}

This image of a high-end establishment portrayed by this club 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.

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According to the BBC, lap dancing clubs have fallen by a third in England^{xiv}. The same report states that “a survey conducted by YouGov in 2015 found 64% of people in Great Britain said strip clubs were a negative part of British culture.” I ask that the Committee refuses to grant the club a licence for all the reasons outlined and because Spearmint Rhino is anachronistic, it gives Sheffield and our much vaunted CIQ a negative image and may deter investors and developers. At a time when we are hoping to attract large investors and are bidding for Channel 4 to relocate in the vicinity, the Committee needs to turn down this licence application, which it is empowered to do.

I look forward to hearing from you.

[Faint signature]

[Faint text]

References

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- i Sheffield Star 16th January 2018 *Dramatic rise in the number of people living in Sheffield city centre* Available from: <https://www.thestar.co.uk/news/dramatic-rise-in-the-number-of-people-living-in-sheffield-city-centre-1-8960059>
- ii Sheffield Chamber of Commerce *Sheffield's Cultural Industries Quarter expansion in £10m City Estates project* Available from: <https://www.scci.org.uk/2017/03/sheffields-cultural-industries-quarter-expansion-in-10m-city-estates-project/>
- iii Sheffield Hallam University 22nd February 2018 *New campus masterplan places Hallam at the heart of the city* Available from: <http://www4.shu.ac.uk/mediacentre/new-campus-masterplan-places-hallam-heart-city>
- iv Wright, P.J & Tokunaga, R.S (2016) Men's Objectifying Media Consumption, Objectification of Women, and Attitudes Supportive of Violence Against Women in *Archives of Sexual Behavior*
- v *Zero Option oral representation at the Spearmint Rhino hearing April 2017* Available from: <https://zerooptionblog.wordpress.com/2017/04/14/zero-options-representation-at-the-spearmint-rhino-licence-renewal-hearing-11th-april-2017/#more-524>
- vi Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87
- vii Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87
- viii 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.
- ix Safe in the City? Girls tell it like it is. March 26, 2017 <https://theconversation.com/safe-in-the-city-girls-tell-it-like-it-is-72975>.
- x Slideshare available from: <https://www.slideshare.net/ZerooptionSheffield/villa-mercedes-hearing-8th-september-2016>
- xi Sanders, T., & Hardy, K. (2011) *The Regulatory Dance: Sexual Consumption in the Night Time Economy – Initial Findings*. Leeds: University of Leeds
- xii Sheffield Star 22nd February 2018 Available from: <https://www.thestar.co.uk/news/listed-these-are-the-10-most-crime-ridden-streets-in-sheffield-1-9030246>
- xiii Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.90
- xiv 23rd February 2018 Available from: <http://www.bbc.co.uk/news/uk-england-43043842>

Bower Claire

From: [REDACTED]
Sent: 30 April 2018 22:16
To: Lonnia Stephen (CEX)
Cc: licensingservice
Subject: Objection to application of Spearmint Rhino gentleman's club to renew sexual entertainment licence

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: SPEARMINT RHINO

Good evening,

I would like to raise another "objection" with regard to the proposed forthcoming application submission for the consideration of the renewal of the sexual entertainment licence for the "gentleman's" club Spearmint Rhino.

In terms of grounds for consideration for rejection of the renewal of the licence, I would respectfully allude to the proximity of the club to its closest neighbours including the adjacent Sheffield Hallam Student Union Hub, and the Showroom Cinema, as the club lies both within the Cultural Industries Quarter and academic corridor close to several other organisations providing educational opportunities for vulnerable people.

I would also like to refer to the Purple Flag status of the city of Sheffield, a city whose motto is "where everyone matters" where the emphasis is upon the promotion of a safe city environment, therefore the safety of both male and female citizens is paramount, and the highly charged atmosphere of a sexual entertainment venue combined with the provision of alcohol being readily available situated on a public transport route is not especially conducive to the safety of its citizens.

Broadening the perspective into the wider social and political context, I believe that in the 21st century, as a forward thinking modern city just ahead of the local council elections, we should be looking at the values behind the sale and purchase of both male and female bodies, in so much as Spearmint Rhino as a sexual entertainment venue acts as an outlet for same in relation to the 1982 miscellaneous provisions Act, and would ask the council to look to its duty to uphold the Public Sector Equality Duty when considering the renewal of a licence for the club.

With regard to a long-term vision, I believe that all of the staff including dancers, domestic staff and other personnel would benefit from the council investing in retraining employees, in addition to a fast track process to facilitate employment opportunities should the decision be taken to revoke the licence pending a judicial review from the previous year's licensing hearing.

Yours sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Bower Claire

From: [REDACTED] <[REDACTED]>
Sent: 01 May 2018 14:24
To: licensingservice
Subject: Objection to Spearmint Rhino licence renewal

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: SPEARMINT RHINO

Dear Licensing

Objection to Spearmint Rhino licence renewal

I refer to the application for a sexual entertainment venue licence by Spearmint Rhino (“the club”), 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 work as a Lecturer at Sheffield Hallam University and as such I attend events in The Hubs, our Student Union building. I know that a number of our students feel uncomfortable about the presence of Spearmint Rhino so close to our Students’ Union, and in the heart of the campus.

After a recent course trip, I accompanied a group of students from Sheffield train station to The Rutland pub on Brown Street. On our way we had to pass Spearmint Rhino and several of the students said that they feel unhappy and angry at having to walk past such a venue on a regular basis.

The middle of a university campus and the city’s Cultural Industries Quarter is a completely inappropriate location for a strip club.

I feel that the normalisation and mainstream promotion of such venues is very harmful to women. These venues promote a dehumanised view of women, sending out the message that women's bodies are for male consumption. In the context of a society in which there is widespread violence against women, and in the light of the recent #Metoo campaign, I think this is something Sheffield Council should be taking very seriously.

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's 2018 Sex Establishment Policy ("the Policy") on the following grounds:

Discretionary Ground d)

i) Character of the relevant locality

1. the fact that the premises are sited in a residential area;

The club backs onto student accommodation and the area is increasingly becoming more residential for students and non-students alike.

The city centre's residential population had risen from 6,000 to 30,000 over the last 10 yearsⁱ with further plans for more residential accommodation within the Cultural Industries Quarter (CIQ) and Knowledge Gateway. Furthermore, "the Alsop Fields development is a mix of residential apartments, studios, offices for the high-tech and creative sectors and places to eat and drink" and ". . . designed to be a destination in itself – a regeneration of part of the Cultural Industries Quarter that will be similar to the trendy parts of Manchester and London"ⁱⁱ for which Brown Street and Paternoster Row are the main thoroughfares.

(d) the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families, including but not limited to educational establishments, leisure facilities such as parks, libraries or swimming pools, markets and covered markets;

The Showroom and adjacent Work Station are frequented by families and both host events specifically for children including the world renown Children's Media Conference.

(e) the premises are sited near places and or buildings of historical/cultural interest and other tourist attractions.

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."

It is also opposite the Site Gallery which has just undergone 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 aforementioned Children's Media Conference; Off the Shelf etc all of which are tourist attractions.

The club is next to Sheffield Hallam Students Union (an iconic and a city landmark building).

ii) Use of other premises in the vicinity

The Licensing Authority will have regard to, but not limited to, the following:

(a) schools, nurseries or other premises substantially used by or for children under 18 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 which provides education for 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 at the epicentre of the designated “Knowledge Gateway” and located on Sheffield Hallam University’s city campus whose masterplan is to further develop the area which includes “new buildings for the Business School and social sciences, refurbishing the Students’ Union building known as The HUBS, creating a University Green [Festival/CIQ Square] and improving our current estate.”ⁱⁱⁱ

(b) parks or other recreational areas designed for use by or for children under 18 years of age;

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) is directly adjacent to the club and the club’s presence is holding back further use and development of this space into its full potential.

(c) hospitals, mental health or disability centres, substance misuse treatment centres, sexual exploitation services, sexual abuse centres or similar premises;

There are a number of charities and organisations in the area which support vulnerable children, young people and adults, one of which is situated directly behind the club. Charles Street is a direct access route from the bus stop on Arundel Gate and the car park on Arundel Street; direct access from both means that service users pass directly past the club through the unused and desolate Festival/CIQ Square.

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See (e) under (i).

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(g) The Cultural Hub (Millennium Galleries, Tudor Square, theatres and library).

The location of the club is a de facto “cultural hub” given it is named the Cultural Industries Quarter. It is also on the direct access route to the 24/7 Addsetts learning centre from numerous student accommodation blocks in the immediate vicinity, which many will be accessing during the club’s opening hours.

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

The building, despite the removal of signage during its closed hours, is a blacked out sinister presence incongruous with its surroundings and clearly marked buildings. Removal of the signage is “a sticking plaster to a gaping wound” approach by Licensing. Regardless of whether the club’s signage is visible in the day, it is widely known what the building is. Those who are not familiar with the building’s use visiting SHU on open days and viewing properties in the vicinity during the day will be unable to make an informed decision about moving into an area with a sex establishment on the doorstep.

Furthermore, the building could be put to a different use serving a far more diverse and greater number of people thereby enriching the CIQ in a far more inclusive and compatible way.

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This applies for this policy and to the consideration and determination of applications for sex establishments. (p.5)

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“Thus, in objectifying media women’s role as a source of male sexual pleasure is emphasized and their humanity is deemphasized. After having internalized the messages of male sexual privilege and female dehumanization, it should be easier for men to envision imposing themselves sexually on women and reacting punitively to women who frustrate their sexual goals.”iv

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Licences will be refused if the Licensing Authority perceives a venue will have negative impacts on members of the public or vulnerable persons living, working or engaged in normal activity in the area.

Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections, including LGBT women and disabled women. In 2017, many examples of the negative impact of this club were given in objections, for example: one woman giving up her studio at Yorkshire Artspace and a contributory factor was the presence of the club and “running the gauntlet of men hanging around outside the club and harassing women.” (objection 12) and others have stated how the club impacts on their business at hearings and in writing.v

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” vi

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” vii.

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.”viii

In addition to an Australian article about women and girls’ perceptions of safety in urban spaces highlights how they restrict their freedom of movement to avoid zones where there are strip clubs.ix

Lap dancing clubs also reinforce negative 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 2016 by Zero Option at the Villa Mercedes hearing representation and its 2017 oral representation at the hearingx.

In their UK study published in 2011 Sanders and Hardy xireported 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 many testimonies of former performers.

The Policy states that “The Licensing Authority will also consider the following factors when deciding if an application is appropriate”:

(b) proximity to areas with high levels of crime;

On 22nd February 2018, it was reported in the Star that Arundel Gate which runs in parallel to Paternoster Row and is approximately 1-2 minutes on foot away depending on walking pace, is 10th in the top 10 areas of crime in the city and that “These offences, including assaults, robberies and sex attacks on women, were recorded between January and November 2017.”xii

This image of a high-end establishment portrayed by this club 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 Committee 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.”xiii

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.

According to the BBC, lap dancing clubs have fallen by a third in England^{xiv}. The same report states that “a survey conducted by YouGov in 2015 found 64% of people in Great Britain said strip clubs were a negative part of British culture.” I ask that the Committee refuses to grant the club a licence for all the reasons outlined and because Spearmint Rhino is anachronistic, it gives Sheffield and our much vaunted CIQ a negative image and may deter investors and developers. At a time when we are hoping to attract large investors and are bidding for Channel 4 to relocate in the vicinity, the Committee needs to turn down this licence application, which it is empowered to do.

I look forward to hearing from you.

[REDACTED]

[REDACTED]

References

iSheffield Star 16th January 2018 *Dramatic rise in the number of people living in Sheffield city centre* Available from: <https://www.thestar.co.uk/news/dramatic-rise-in-the-number-of-people-living-in-sheffield-city-centre-1-8960059>

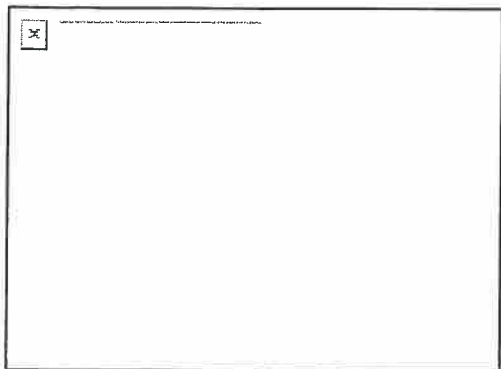


Dramatic rise in the number of people living in Sheffield ...

www.thestar.co.uk

The number of people living in Sheffield city centre has risen by a staggering 400 per cent over the last 10 years - and council bosses hope to see it rise at an even quicker pace.

ii Sheffield Chamber of Commerce *Sheffield's Cultural Industries Quarter expansion in £10m City Estates project*
Available from: <https://www.scci.org.uk/2017/03/sheffields-cultural-industries-quarter-expansion-in-10m-city-estates-project/>



Sheffield's Cultural Industries Quarter expansion in £10m ...

www.scci.org.uk

Sheffield's Cultural Industries Quarter will be extended as a £10m project takes shape to add apartments and studios, offices for the high-tech and creative sectors and places to eat and drink. A mix of new buildings and refurbished old factories will form the first phase of Alsop Fields, harking ...

iii Sheffield Hallam University 22nd February 2018 *New campus masterplan places Hallam at the heart of the city*
Available from: <http://www4.shu.ac.uk/mediacentre/new-campus-masterplan-places-hallam-heart-city>

New campus masterplan places Hallam at the heart of the ...

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Sheffield Hallam University has today revealed its campus masterplan which places it at the heart of the city.

iv Wright, P.J & Tokunaga, R.S (2016) Men's Objectifying Media Consumption, Objectification of Women, and Attitudes Supportive of Violence Against Women in *Archives of Sexual Behavior*
v *Zero Option oral representation at the Spearmint Rhino hearing April 2017* Available from: <https://zerooptionblog.wordpress.com/2017/04/14/zero-options-representation-at-the-spearmint-rhino-licence-renewal-hearing-11th-april-2017/#more-524>

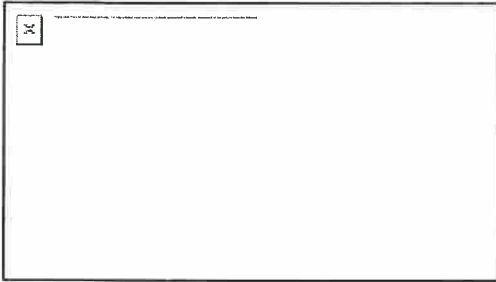


Zero Option's representation at the Spearmint Rhino ...

zerooptionblog.wordpress.com

This is the full text of Zero Option's representation at Spearmint Rhino's SEV licence renewal hearing on 11th April 2017. Unfortunately, due to time constraints we were unable to read it in full.

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- vi Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87
- vii Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87
- viii 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.
- ix Safe in the City? Girls tell it like it is. March 26, 2017 <https://theconversation.com/safe-in-the-city-girls-tell-it-like-it-is-72975>.



Safe in the City? Girls tell it like it is

theconversation.com

Where do women feel safe - or unsafe - in city streets? A new research project has unearthed some disturbing responses.

x Slideshare available from: <https://www.slideshare.net/ZerooptionSheffield/villa-mercedes-hearing-8th-september-2016>



Villa Mercedes Hearing 8th September 2016 - SlideShare

www.slideshare.net

Slides presented by Zero Option at the Villa Mercedes sexual entertainment venue licence (SEV) hearing, Sheffield 8th September 2016

- xi Sanders, T., & Hardy, K. (2011) *The Regulatory Dance: Sexual Consumption in the Night Time Economy – Initial Findings*. Leeds: University of Leeds
- xii Sheffield Star 22nd February 2018 Available from: <https://www.thestar.co.uk/news/listed-these-are-the-10-most-crime-ridden-streets-in-sheffield-1-9030246>



LISTED: These are the 10 most crime-ridden streets in ...

www.thestar.co.uk

Sheffield's 10 most crime-ridden streets have been revealed today, with 800 offences committed on one street alone last year.

xiii Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.90

xiv 23rd February 2018 Available from: <http://www.bbc.co.uk/news/uk-england-43043842>

Licensing Service
 Block C, Staniforth Road Depot
 Staniforth Road
 Surrey Street
 S9 3HD
 By email to: licensing@sheffield.gov.uk

1st May 2018

Dear Licensing

Objection to Spearmint Rhino licence renewal

I refer to the application for a sex establishment licence by Spearmint Rhino ("the club"), 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 2018 Sex Establishment Policy ("the Policy") on the following grounds:

Discretionary Ground d)

i) Character of the relevant locality

(a) the fact that the premises are sited in a residential area;

The club backs onto student accommodation and the area is increasingly becoming more residential for students and non-students alike.

The city centre's residential population had risen from 6,000 to 30,000 over the last 10 yearsⁱ with further plans for more residential accommodation within the Cultural Industries Quarter (CIQ) and Knowledge Gateway. Furthermore, "the Alsop Fields development is a mix of residential apartments, studios, offices for the high-tech and creative sectors and places to eat and drink" and ". . . designed to be a destination in itself – a regeneration of part of the Cultural Industries Quarter that will be similar to the trendy parts of Manchester and London"ⁱⁱ for which Brown Street and Paternoster Row are the main thoroughfares.

(d) the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families, including but not limited to educational establishments, leisure facilities such as parks, libraries or swimming pools, markets and covered markets;

The Showroom and adjacent Work Station are frequented by families and both host events specifically for children including the world renowned Children's Media Conference. For several years, I have been involved with the South Yorkshire poetry festival, an important literature event for the region which uses these premises. The proximity to Spearmint Rhino was something that our festival attendees - many of whom were visiting Sheffield for the first time - found off-putting or even threatening.

(e) the premises are sited near places and or buildings of historical/cultural interest and other tourist attractions.

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."

It is also opposite the Site Gallery which has just undergone 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 aforementioned Children's Media Conference; Off the Shelf etc all of which are tourist attractions.

The club is next to Sheffield Hallam Students Union (an iconic and a city landmark building) and offers a problematic message to students in the city.

ii) Use of other premises in the vicinity

The Licensing Authority will have regard to, but not limited to, the following:

(a) schools, nurseries or other premises substantially used by or for children under 18 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 which provides education for 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 at the epicentre of the designated "Knowledge Gateway" and located on Sheffield Hallam University's city campus whose masterplan is to further develop the area which includes "new buildings for the Business School and social sciences, refurbishing the Students' Union building known as The HUBS, creating a University Green [Festival/CIQ Square] and improving our current estate."ⁱⁱⁱ

(b) parks or other recreational areas designed for use by or for children under 18 years of age;

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) is directly adjacent to the club and the club's presence is holding back further use and development of this space into its full potential.

(c) hospitals, mental health or disability centres, substance misuse treatment centres, sexual exploitation services, sexual abuse centres or similar premises;

There are a number of charities and organisations in the area which support vulnerable children, young people and adults, one of which is situated directly behind the club. Charles Street is a direct access route from the bus stop on Arundel Gate and the car park on Arundel Street; direct access from both means that service users pass directly past the club through the unused and desolate Festival/CIQ Square.

(d) any central gateway to the city or other city landmark, historic building or tourist attraction;

See (e) under (i).

(f) predominately residential areas;

See (a) under (i)

(g) The Cultural Hub (Millennium Galleries, Tudor Square, theatres and library).

The location of the club is a de facto "cultural hub" given it is named the Cultural Industries Quarter. It is also on the direct access route to the 24/7 Addsetts learning centre from numerous student accommodation blocks in the immediate vicinity, which many will be accessing during the club's opening hours.

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

The building, despite the removal of signage during its closed hours, is a blacked out sinister presence incongruous with its surroundings and clearly marked buildings. Removal of the signage is “a sticking plaster to a gaping wound” approach by Licensing. Regardless of whether the club’s signage is visible in the day, it is widely known what the building is. Those who are not familiar with the building’s use visiting SHU on open days and viewing properties in the vicinity during the day will be unable to make an informed decision about moving into an area with a sex establishment on the doorstep.

Furthermore, the building could be put to a different use serving a far more diverse and greater number of people thereby enriching the CIQ in a far more inclusive and compatible way.

Further grounds for refusal

The Public Sector Equality Duty and Gender Equality

The Policy states under the heading “The Equality Act 2010”:

This Act legally protects people from discrimination in the workplace and wider society. This includes the Public Sector Equality Duty (PSED), which means that the Council must thoroughly consider, in the discharge

of its licensing functions, the need to:

- promote equality of opportunity;
- eliminate unlawful discrimination, harassment and victimisation;
- promote good relations.

This applies for this policy and to the consideration and determination of applications for sex establishments. (p.5)

I believe that sex establishments such as Spearmint Rhino directly discriminate against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. A 2016 review highlights how these venues undermine women’s equality:

“Thus, in objectifying media women’s role as a source of male sexual pleasure is emphasized and their humanity is deemphasized. After having internalized the messages of male sexual privilege and female dehumanization, it should be easier for men to envision imposing themselves sexually on women and reacting punitively to women who frustrate their sexual goals.”^{iv}

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 sex establishments to be licensed in specific areas – subject to the choices of the local communities.

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Lap dancing clubs also reinforce negative 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 2016 by Zero Option at the Villa Mercedes hearing representation and its 2017 oral representation at the hearing^x.

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References

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ⁱⁱ Sheffield Chamber of Commerce *Sheffield's Cultural Industries Quarter expansion in £10m City Estates project* Available from: <https://www.scci.org.uk/2017/03/sheffields-cultural-industries-quarter-expansion-in-10m-city-estates-project/>

ⁱⁱⁱ Sheffield Hallam University 22nd February 2018 *New campus masterplan places Hallam at the heart of the city* Available from: <http://www4.shu.ac.uk/mediacentre/new-campus-masterplan-places-hallam-heart-city>

^{iv} Wright, P.J & Tokunaga, R.S (2016) Men's Objectifying Media Consumption, Objectification of Women, and Attitudes Supportive of Violence Against Women in *Archives of Sexual Behavior*

^v *Zero Option oral representation at the Spearmint Rhino hearing April 2017* Available from: <https://zerooptionblog.wordpress.com/2017/04/14/zero-options-representation-at-the-spearmint-rhino-licence-renewal-hearing-11th-april-2017/#more-524>

^{vi} Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

^{vii} Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

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

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^{xiii} Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.90

Licensing Service, Sheffield City Council,
Block C
Staniforth Road Depot
Staniforth Road
SHEFFIELD S9 3HD
By email to: licensing@sheffield.gov.uk

To Whom It May Concern

I wish to register my objection to the application by Sonfield Developments Ltd c/o 161 Tottenham Court Road, London for renewal of a Sexual Entertainment Venue licence for Spearmint Rhino, 60 Brown Street, Sheffield S1 2BS on the following grounds;

- Strip clubs are a form of violence against women
- Strip clubs promote the idea that women's bodies can be bought, treating the performer as a commodity with no regard to her actual feelings, as if she were an object: if she really wanted to strip for whoever pays her she wouldn't need to be paid to do so. This is dehumanising and disempowering to the performer. The punter is eroticising his power over the woman and getting a sexual thrill from his control over her. This is toxic, abusive masculinity.
- Many ex-strippers have spoken of the psychological harm they have experienced as a result of working in strip clubs. This is trauma caused by dissociation, the act of separating their mind and feelings from their bodies, which is required in order to cope. Often, it is only when they have stopped stripping that they realise the harm caused to them by it, which is similar to the experience of women once they have left an abusive relationship.
- Licensing Spearmint Rhino gives a message to everyone in the city, not just the men who use it, that Sheffield Council thinks it is acceptable for women to be treated like this.
- Condoning, by licensing, a strip club which is set up solely to profit from the objectification of women is to effectively promote views and behaviours which are associated with male violence towards women and girls, stoking the misogynistic attitudes that lead to this violence.
- Research again and again identifies the link that men who hold objectifying views of women as lesser than human are more likely to be violent to them.
- Many women have written to the Council specifically stating how uncomfortable and unsafe they feel walking past Spearmint Rhino. Many try to avoid walking past it. No-one should feel unsafe in Sheffield and there should be no no-go areas for women.
- Thus, to relicence Spearmint Rhino would have the effect of promoting inequality between the sexes, which is not consistent with the Council's obligations under the Equality Act to foster good relations between men and women.
- Sheffield should be a city that aspires to promote fairness and equality for all. As such I would ask that Spearmint Rhino's license renewal is declined.

SIGNED:



Bower Claire

From: ■ [REDACTED]
Sent: 01 May 2018 23:47
To: licensingservice
Subject: Please do not allow a lap dancing club in Sheffield.

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: SPEARMINT RHINO

I believe that strip clubs should not be allowed in our city- or indeed anywhere.

Spearmint Rhino, a lapdancing and strip club in Sheffield city centre, has applied to renew its operating licence. Please do not renew it. I believe in equality between women and men. I object to women being treated as commodities. Strip clubs thus are incompatible with the Council's obligations under the Equality Act to foster good relations between the sexes.

Yours sincerely
[REDACTED]

Bower Claire

From: [REDACTED] <[REDACTED]>
Sent: 02 May 2018 09:53
To: licensingservice
Subject: Objection to relicensing of Spearmint Rhino

Licensing Service
 Block C, Staniforth Road Depot
 Staniforth Road
 Surrey Street
 S9 3HD
 By email to: licensingservice@sheffield.gov.uk

2 May 2018

Dear Licensing,

Objection to Spearmint Rhino licence renewal

I refer to the application for a sex establishment licence by Spearmint Rhino ("the club"), 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 2018 Sex Establishment Policy ("the Policy") on the following grounds:

Discretionary Ground d)

i) Character of the relevant locality

(a) the fact that the premises are sited in a residential area;

The club backs onto student accommodation and the area is increasingly becoming more residential for students and non-students alike.

The city centre's residential population had risen from 6,000 to 30,000 over the last 10 years^[i] with further plans for more residential accommodation within the Cultural Industries Quarter (CIQ) and Knowledge Gateway. Furthermore, "the Alsop Fields development is a mix of residential apartments, studios, offices for the high-tech and creative sectors and places to eat and drink" and ". . . designed to be a destination in itself – a regeneration of part of the Cultural Industries Quarter that will be similar to the trendy parts of Manchester and London"^[ii] for which Brown Street and Paternoster Row are the main thoroughfares.

(d) the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families, including but not limited to educational establishments, leisure facilities such as parks, libraries or swimming pools, markets and covered markets;

The Showroom and adjacent Work Station are frequented by families and both host events specifically for children including the world renown Children's Media Conference.

(e) the premises are sited near places and or buildings of historical/cultural interest and other tourist attractions.

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."

It is also opposite the Site Gallery which has just undergone 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 aforementioned Children's Media Conference; Off the Shelf etc all of which are tourist attractions.

The club is next to Sheffield Hallam Students Union (an iconic and a city landmark building).

ii) Use of other premises in the vicinity

The Licensing Authority will have regard to, but not limited to, the following:

(a) schools, nurseries or other premises substantially used by or for children under 18 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 which provides education for 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 at the epicentre of the designated "Knowledge Gateway" and located on Sheffield Hallam University's city campus whose masterplan is to further develop the area which includes "new buildings for the Business School and social sciences, refurbishing the Students' Union building known as The HUBS, creating a University Green [Festival/CIQ Square] and improving our current estate."^[iii]

(b) parks or other recreational areas designed for use by or for children under 18 years of age;

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) is directly adjacent to the club and the club's presence is holding back further use and development of this space into its full potential.

(c) hospitals, mental health or disability centres, substance misuse treatment centres, sexual exploitation services, sexual abuse centres or similar premises;

There are a number of charities and organisations in the area which support vulnerable children, young people and adults, one of which is situated directly behind the club. Charles Street is a direct access route from the bus stop on Arundel Gate and the car park on Arundel Street; direct access from both means that service users pass directly past the club through the unused and desolate Festival/CIQ Square.

(d) any central gateway to the city or other city landmark, historic building or tourist attraction;

See (e) under (i).

(f) predominately residential areas;

See (a) under (i)

(g) The Cultural Hub (Millennium Galleries, Tudor Square, theatres and library).

The location of the club is a de facto "cultural hub" given it is named the Cultural Industries Quarter. It is also on the direct access route to the 24/7 Addsetts learning centre from numerous student accommodation blocks in the immediate vicinity, which many will be accessing during the club's opening hours.

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

The building, despite the removal of signage during its closed hours, is a blacked out sinister presence incongruous with its surroundings and clearly marked buildings. Removal of the signage is "a sticking plaster to a gaping wound" approach by Licensing. Regardless of whether the club's

signage is visible in the day, it is widely known what the building is. Those who are not familiar with the building's use visiting SHU on open days and viewing properties in the vicinity during the day will be unable to make an informed decision about moving into an area with a sex establishment on the doorstep.

Furthermore, the building could be put to a different use serving a far more diverse and greater number of people thereby enriching the CIQ in a far more inclusive and compatible way.

Further grounds for refusal

The Public Sector Equality Duty and Gender Equality

The Policy states under the heading "The Equality Act 2010":

This Act legally protects people from discrimination in the workplace and wider society. This includes the Public Sector Equality Duty (PSED), which means that the Council must thoroughly consider, in the discharge of its licensing functions, the need to:

- promote equality of opportunity;
- eliminate unlawful discrimination, harassment and victimisation;
- promote good relations.

This applies for this policy and to the consideration and determination of applications for sex establishments. (p.5)

I believe that sex establishments such as Spearmint Rhino directly discriminate against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. A 2016 review highlights how these venues undermine women's equality:

"Thus, in objectifying media women's role as a source of male sexual pleasure is emphasized and their humanity is deemphasized. After having internalized the messages of male sexual privilege and female dehumanization, it should be easier for men to envision imposing themselves sexually on women and reacting punitively to women who frustrate their sexual goals."^[iv]

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 sex establishments to be licensed in specific areas – subject to the choices of the local communities.

The Policy further states that:

Licences will be refused if the Licensing Authority perceives a venue will have negative impacts on members of the public or vulnerable persons living, working or engaged in normal activity in the area.

Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections, including LGBT women and disabled women. In 2017, many examples of the negative impact of this club were given in objections, for example: one woman giving up her studio at Yorkshire Artspace and a contributory factor was the presence of the club and "running the gauntlet of men hanging around outside the club and harassing women." (objection 12) and others have stated how the club impacts on their business at hearings and in writing.^[v]

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" ^[vi]

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" ^[vii].

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.”^[viii]

In addition to an Australian article about women and girls’ perceptions of safety in urban spaces highlights how they restrict their freedom of movement to avoid zones where there are strip clubs.^[ix]

Lap dancing clubs also reinforce negative 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 2016 by Zero Option at the Villa Mercedes hearing representation and its 2017 oral representation at the hearing^[x].

In their UK study published in 2011 Sanders and Hardy ^[xi]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 many testimonies of former performers.

The Policy states that “The Licensing Authority will also consider the following factors when deciding if an application is appropriate”:

(b) proximity to areas with high levels of crime;

On 22nd February 2018, it was reported in the Star that Arundel Gate which runs in parallel to Paternoster Row and is approximately 1-2 minutes on foot away depending on walking pace, is 10th in the top 10 areas of crime in the city and that “These offences, including assaults, robberies and sex attacks on women, were recorded between January and November 2017.”^[xii]

This image of a high-end establishment portrayed by this club 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 Committee 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.”^[xiii]

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.

According to the BBC, lap dancing clubs have fallen by a third in England^[xiv]. The same report states that “a survey conducted by YouGov in 2015 found 64% of people in Great Britain said strip clubs were a negative part of British culture.” I ask that the Committee refuses to grant the club a licence for all the reasons outlined and because Spearmint Rhino is anachronistic, it gives Sheffield and our much vaunted CIQ a negative image and may deter investors and developers. At a time when we are hoping to attract large investors and are bidding for Channel 4 to relocate in the vicinity, the Committee needs to turn down this licence application, which it is empowered to do.

I look forward to hearing from you.

Yours faithfully,
[Redacted Signature]

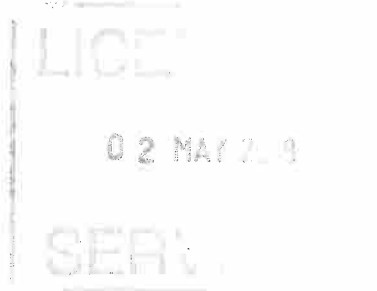
References

- [i] Sheffield Star 16th January 2018 *Dramatic rise in the number of people living in Sheffield city centre* Available from: <https://www.thestar.co.uk/news/dramatic-rise-in-the-number-of-people-living-in-sheffield-city-centre-1-8960059>
- [ii] Sheffield Chamber of Commerce *Sheffield's Cultural Industries Quarter expansion in £10m City Estates project* Available from: <https://www.scci.org.uk/2017/03/sheffields-cultural-industries-quarter-expansion-in-10m-city-estates-project/>
- [iii] Sheffield Hallam University 22nd February 2018 *New campus masterplan places Hallam at the heart of the city* Available from: <http://www4.shu.ac.uk/mediacentre/new-campus-masterplan-places-hallam-heart-city>
- [iv] Wright, P.J & Tokunaga, R.S (2016) Men's Objectifying Media Consumption, Objectification of Women, and Attitudes Supportive of Violence Against Women in *Archives of Sexual Behavior*
- [v] *Zero Option oral representation at the Spearmint Rhino hearing April 2017* Available from: <https://zerooptionblog.wordpress.com/2017/04/14/zero-options-representation-at-the-spearmint-rhino-licence-renewal-hearing-11th-april-2017/#more-524>
- [vi] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87
- [vii] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87
- [viii] 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.
- [ix] Safe in the City? Girls tell it like it is. March 26, 2017 <https://theconversation.com/safe-in-the-city-girls-tell-it-like-it-is-72975>.
- [x] Slideshare available from: <https://www.slideshare.net/ZerooptionSheffield/villa-mercedes-hearing-8th-september-2016>
- [xi] Sanders, T., & Hardy, K. (2011) *The Regulatory Dance: Sexual Consumption in the Night Time Economy – Initial Findings*. Leeds: University of Leeds
- [xii] Sheffield Star 22nd February 2018 Available from: <https://www.thestar.co.uk/news/listed-these-are-the-10-most-crime-ridden-streets-in-sheffield-1-9030246>
- [xiii] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.90
- [xiv] 23rd February 2018 Available from: <http://www.bbc.co.uk/news/uk-england-43043842>

Sheffield Hallam University

30th April 2018

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



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

We, Sheffield Hallam University, wish to object to the above application on the grounds outlined below.

Part 7 - Policy of Sheffield City Councils Sex Establishment Policy, Discretionary Ground d) Location, states that "The Act permits applications to be refused:

- i. where the grant would be inappropriate having regard to the character of the relevant locality;*
- ii. where the grant would be inappropriate having regard to other premises in the vicinity"*

Our specific comments against the policy are as follows:

60 Brown Street is sited in what is now a residential area with student living accommodation located directly to the rear of the building on Arundel Lane. Furthermore, there are further planned developments to provide PRS (at Allsop Fields area adjacent to Decathlon), residential and student accommodation (Furnival Square) within the surrounding area which will bring a vastly increased number of residents within a short distance of the establishment. Our recently launched Sheaf Tower development proposal will also seek to create a high quality development that brings a high class hotel, restaurants, conference facility and residential accommodation to within approximately 300 metres of the establishment. The Licencing Authority states that it will have regard to this [section i(a)].

60 Brown Street is a short distance away from the University Technical College which is attended by pupils of the ages 14-19. They are regularly seen walking in the locality, including past 60 Brown Street. The premises are also adjacent to Festival Square, a public open space used by members of the public including families with children and those under 18 years of age. We have recently been working with the Site Gallery to improve the Festival Square and increase the amount of cultural animation and activity, both day and night time around the square to enhance its prominence as one of the City's key cultural hubs.

Clearly the ongoing presence of a strip club directly adjacent to a cultural area is at odds and threatens to jeopardise the long term plans for this area. The Licencing Authority states that it will have regard to this [Section i (b) & i (d)].

60 Brown Street is sited near to Sheffield Hallam University's Prayer Rooms and Multi-Faith Chaplaincy which attracts a large number of students seeking a place of worship, spirituality, meditation or reflection, including Muslim Prayer Rooms. The route to these facilities takes visitors past Spearmint Rhino. A venue such as this can cause offence to such students. These facilities are sensitive for religious purposes. The same applies for those using the Counselling and Wellbeing services available for staff and students at SHU. The Licencing Authority states that it will have regard to this [Section i (c)].

The premises are sited adjacent to Sheffield Hallam Union of Students Building, the HUBs, formerly the National Centre for Popular Music. This is an iconic building, a Sheffield City Landmark and is of cultural interest. The Licencing Authority cannot disclaim that 60 Brown Street is in an area of cultural interest given that it is within the Cultural Industries Quarter. The premises are located on a gateway to the city, just meters away from The Councils designated Gold Route. The Licencing Authority states that it will have regard to this [Section i (e) & ii (e)].

Commentary

The route past Spearmint Rhino is a very high traffic area for students with an abundance of student accommodation nearby with a development of student accommodation situated immediately adjacent to the venue on Arundel Lane. The route for students to Sheffield Hallam takes them directly past the venue during normal working hours and around the clock - Sheffield Hallam University's Learning Centre is open 24/7 and the core teaching hours are up to 9pm. There is a concern that our students are entitled to and need to feel safe and secure during their studies at Sheffield Hallam and that a venue such as Spearmint Rhino will undermine the perception of safety, equality and diversity that the City and the University are spending considerable resources to develop and ensure. The current existence of the venue portrays the area in an anti-social light not conducive with its setting in the Cultural Industries Quarter, with the potential to create a perception of fear and crime rather than safety and vibrancy.

The presence of a striptease club in the heart of the Cultural Industries Quarter is inappropriate, with the focus of the area being arts, media and education mixed with industrial heritage. Sheffield train station and the main transport interchange is just a moment's walk from the venue providing a main gateway (the 'Gold Route') to and from the city centre. It is felt that having Spearmint Rhino in such a location gives a negative impression of Sheffield and Sheffield Hallam University and serves to undermine the considerable improvements that are planned for this part of the City Centre.

Spearmint Rhino is also directly adjacent to the Quarters' only designated Public Space which is not used to its full potential; this being highly likely due to the fact that it is next to a strip club and this in turn prevents the creation of a day and night active frontage onto the public space. It is also directly adjacent to Sheffield Hallam University's Students Union which is a Social and Cultural Hub as well as providing advice and services including counselling, equality, disability, legal and personal issues.

According to Sheffield City Councils' Urban Design Statement, the venue is surrounded by significant buildings of character, is within a Character Area and is adjacent to a Landmark building (SHU Students Union). Granting a licence to a Sexual Entertainment Venue is not in keeping with the quality and public use of the area.

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

Sheffield Hallam University also has various Cultural and social hubs nearby including Cafes on Arundel Street. There are several art galleries in the vicinity, often used by Sheffield Hallam including several venues on Brown Street and Paternoster Row.

SHU Campus Plan

Sheffield Hallam University has recently launched its ambitious and visionary Campus Masterplan to great acclaim both locally and nationally. Sheffield City Council has had significant involvement in the development of our Campus Masterplan and is very supportive of our proposals. Phase 1 of the Plan, which will be implemented over the next 5 years, intensifies development in the CIQ and focuses on the development of a new gateway to the University and the City. This will commence with the demolition of the Science Park to make way for new developments on the site and on that of the Science Park Car Park. It will see the creation of a 'University Green' on Arundel Lane, immediately adjacent to the premises currently housing Spearmint Rhino and as such we are concerned that the presence of this Sexual Entertainment Venue will have a greater negative impact on what will be a highly positive and substantial investment by Sheffield Hallam University. The Campus Masterplan also has the support of the Sheffield City Region for the Sheffield City Gateway. This highlights the significance of the plans and the positive impact they will have on the city and more importantly, the immediate area in which Phase 1 is operating.

I draw your attention to the attached images and plans. The first one (Appendix 1) shows the new buildings in the SHU Campus Plan. Phase 1 clearly shows the proximity of the prestigious new development to 60 Brown Street. The second plan (Appendix 2) is taken from The Councils' current City Centre Master Plan and shows the proposals for 'Knowledge City' - we are aware that this is in the process of being revised but that the proposals will still be progressed. This has been annotated to show the current position in terms of developments. The purple dashed outline denotes an area that is 'University Related'. The site 60 Brown Street - Spearmint Rhino - is absurdly within this boundary. Spearmint Rhino is in no way educational and should not form any part of the Knowledge City. It has no place near a learning environment and it is ludicrous to think that such a venue be sited anywhere near, let alone within, such an area, where tens of thousands of students descend from all over the globe to receive a world-class education.

The commentary by Sheffield City Council relating to the Knowledge City portrays the importance of its relationship with the higher education establishments in the city. This can be seen in Appendix 3. (This is soon to be replaced the 2018 City Centre Plan). Furthermore, the planned development of the Knowledge Gateway project, which will improve the street frontage on Brown Street, in front of Spearmint Rhino and along Paternoster Row, demonstrates that this is a location that the Council is supporting continued cultural and economic development.

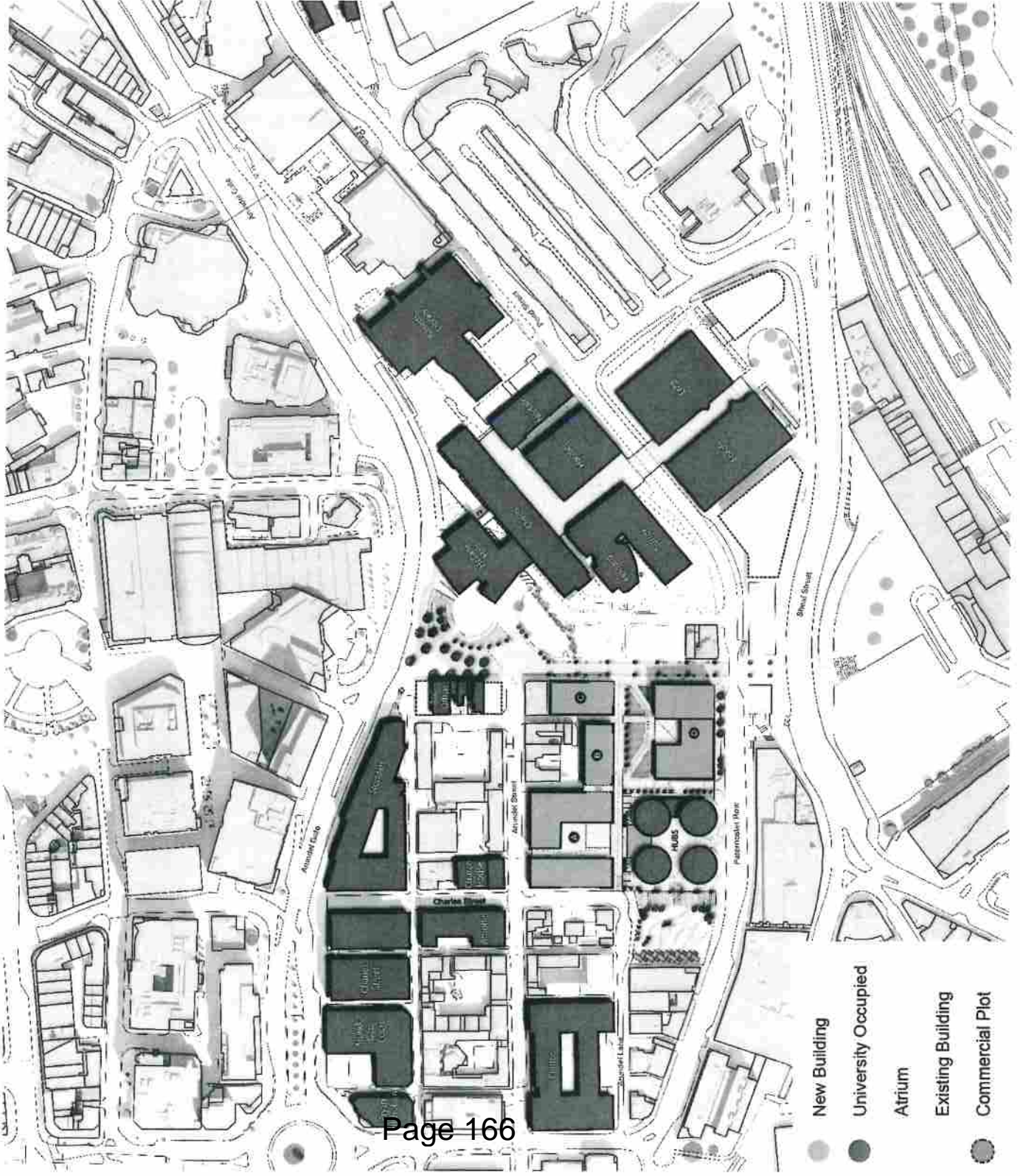
We would like to highlight the significant conflict that the Council communicates through its continuing decision to grant the Sexual Entertainment Venue licence for Spearmint Rhino in its current location. If the licencing Authority believes that the venue contributes in a cultural or educational manner, then it is questioned as to why the venue is not highlighted on Plan 2 as being such an attraction, along with Festival Square, HUBs, the Showroom, Site Gallery, Workstation, Persistence Works and the Institute of Art. This is also the case in the City Centre Master Plans' 'Vibrancy, Hospitality, Attractions' section (Appendix 4) - Spearmint Rhino is clearly not identified by The Council as an 'attraction'; else it would feature as such here.

Having worked with stakeholders across the CIQ and City, including the City Council, in the development of our new Campus Masterplan, we believe that there are now far too many compelling reasons for the Council not to renew the license to Spearmint Rhino. Indeed, if this were to be renewed then we believe that the Council would be placing itself into conflict regarding its own plans for the development of the City Centre and jeopardising both the potential impact of the planned Knowledge Gateway investment and also the proposed plans for a number of key stakeholders to obtain external funding and continue to develop this part of the city into a thriving cultural hub, right at the gateway to the City.

We hope therefore that the Council will finally take into account the numerous objections that have and will be raised against the granting of a renewed license for Spearmint Rhino and will this time act decisively in a manner that supports the interests of the planned and future development of the City and does not renew the license.

Appendix 1

Phase 1



Phase 1 involves development in the CIQ and focuses development to form a new gateway to the University and the city by activating the southern edge of Howard Street.

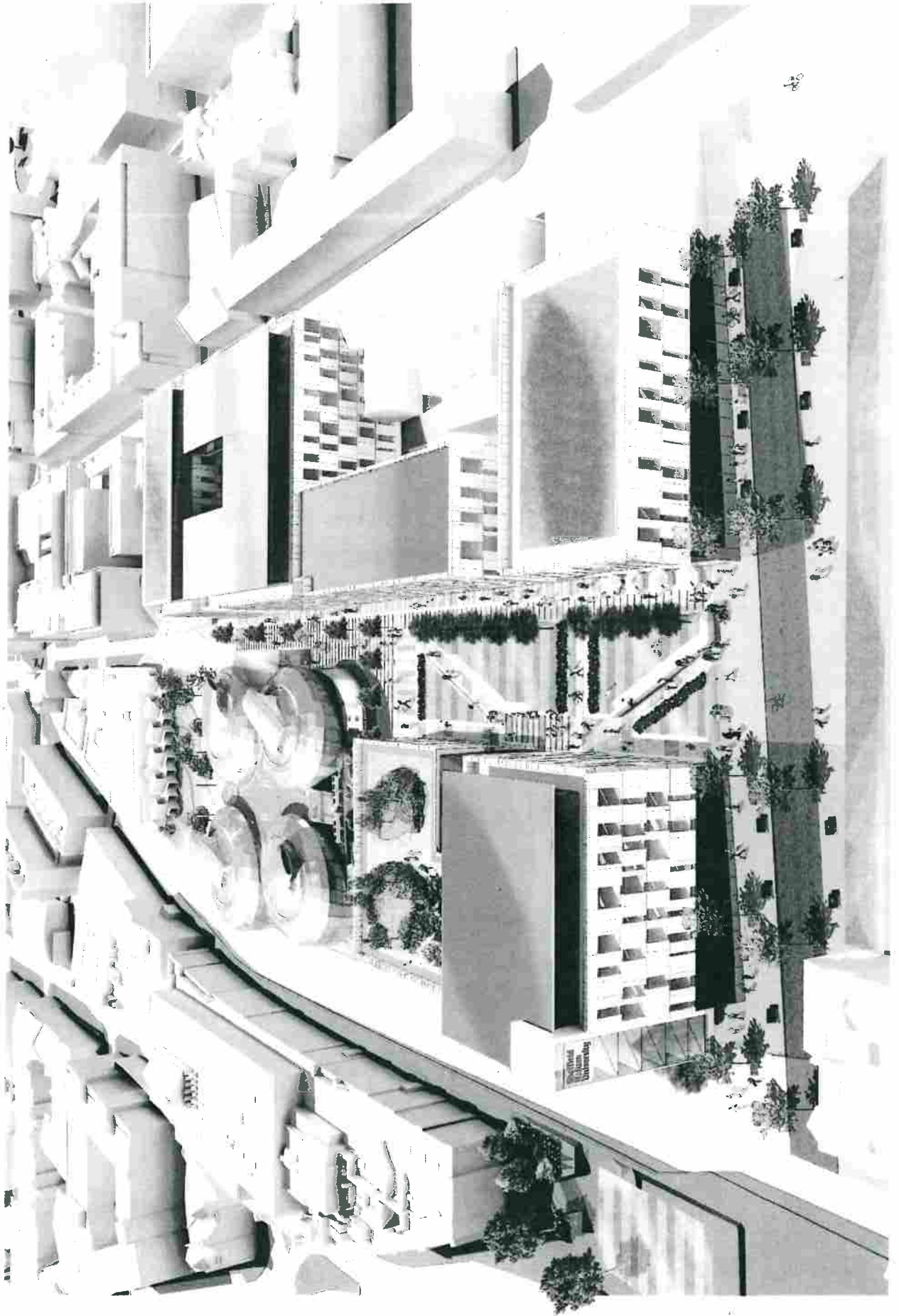
A 'University Green' is created on Arundel Lane, providing a new external Heartspace and campus identity for Sheffield Hallam University.

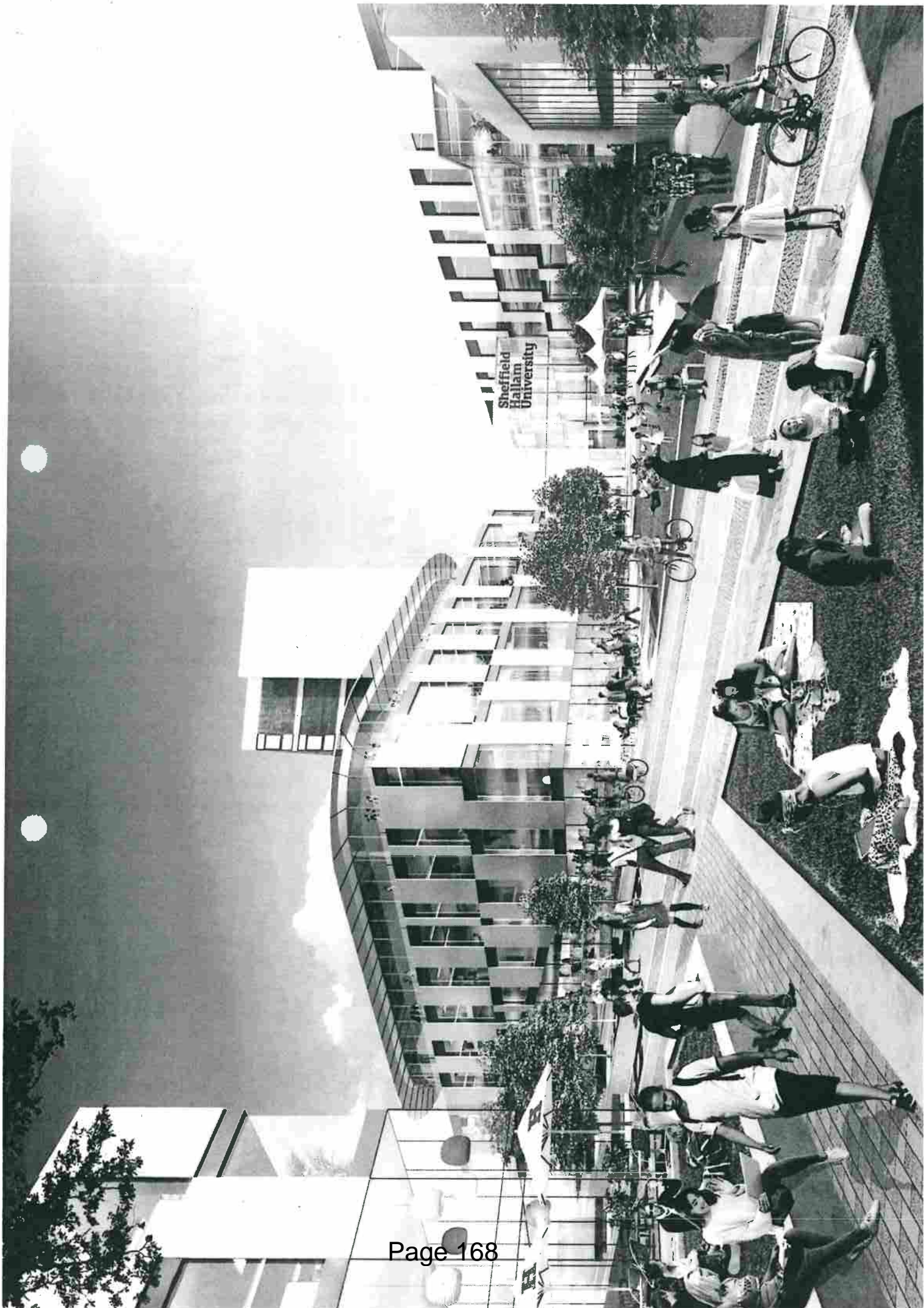
The layout improves the pedestrian permeability along Arundel Lane, following the historic street pattern.

A strong civic presence is provided at the prominent corner where Howard Street meets Paternoster Row.

New buildings provide the opportunity to create active frontages showcasing the University's activities to the city and beyond.

City Phase 1





Student-Centred



Sense of Place & Identity



Connected, Collaborative & Organised



High Quality



Staff & Visitor-focused



Business Focused



Civic Presence



Showcase



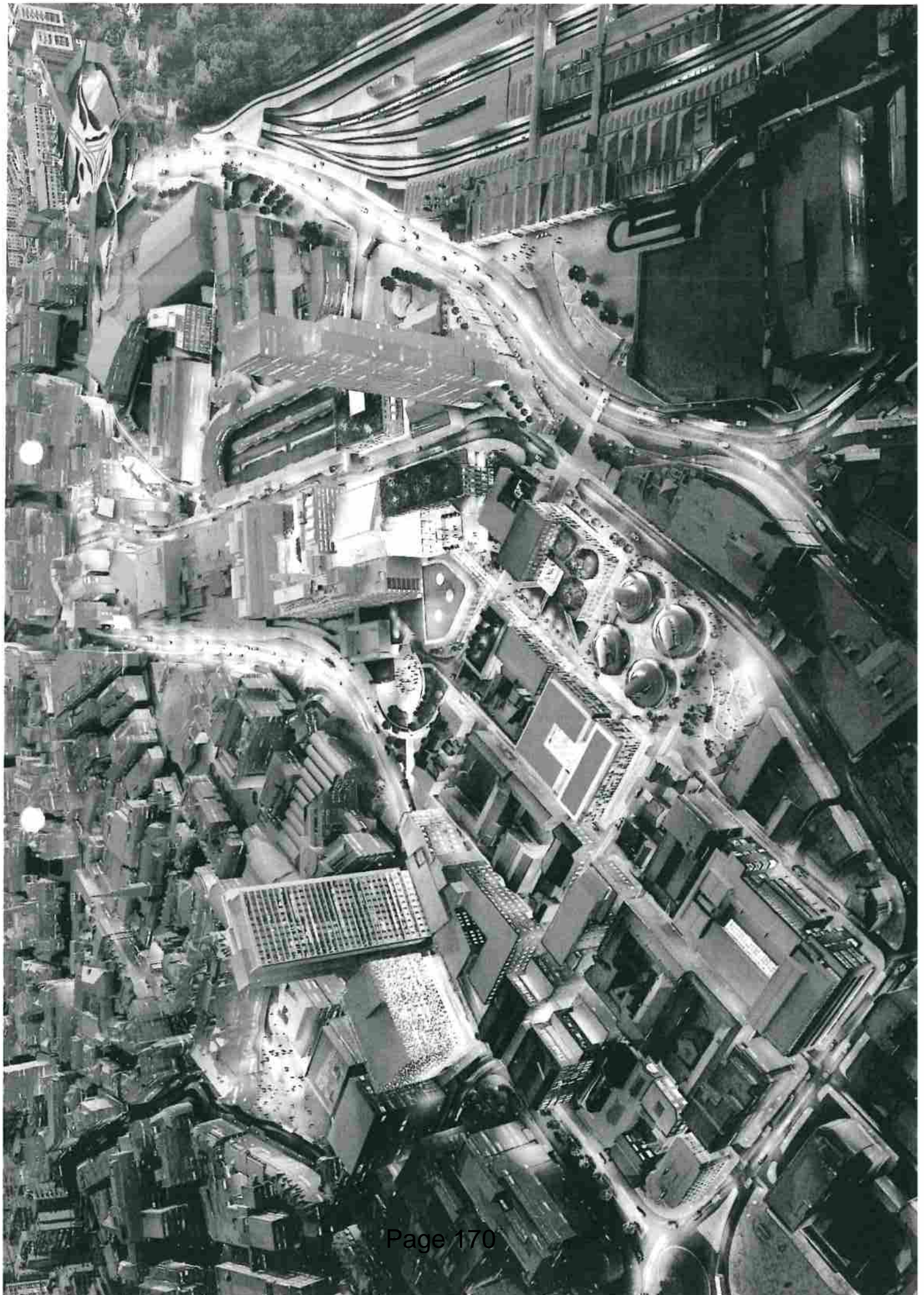
Campus Spine
Public Spaces
Gateways & Civic Presence
Permeability
Showcasing

Peace
Gardens

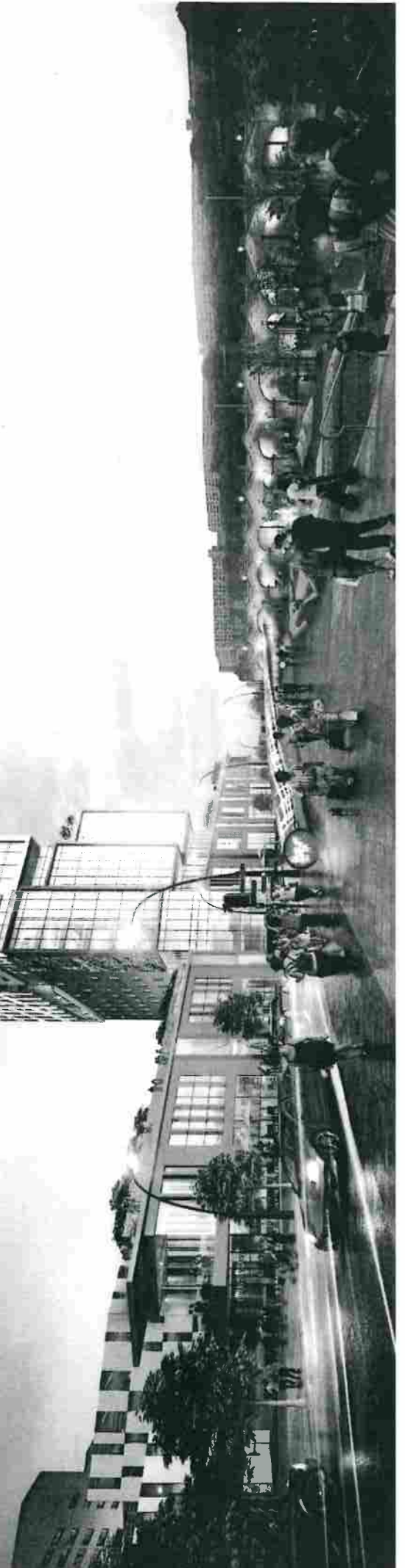
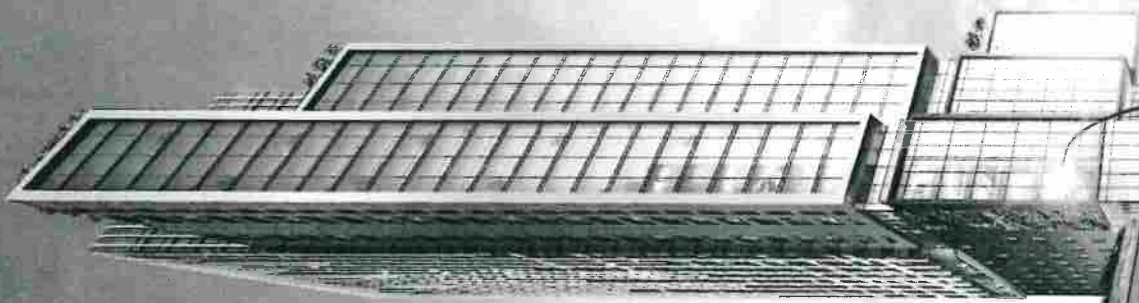
Library

HUBS

Train
Station

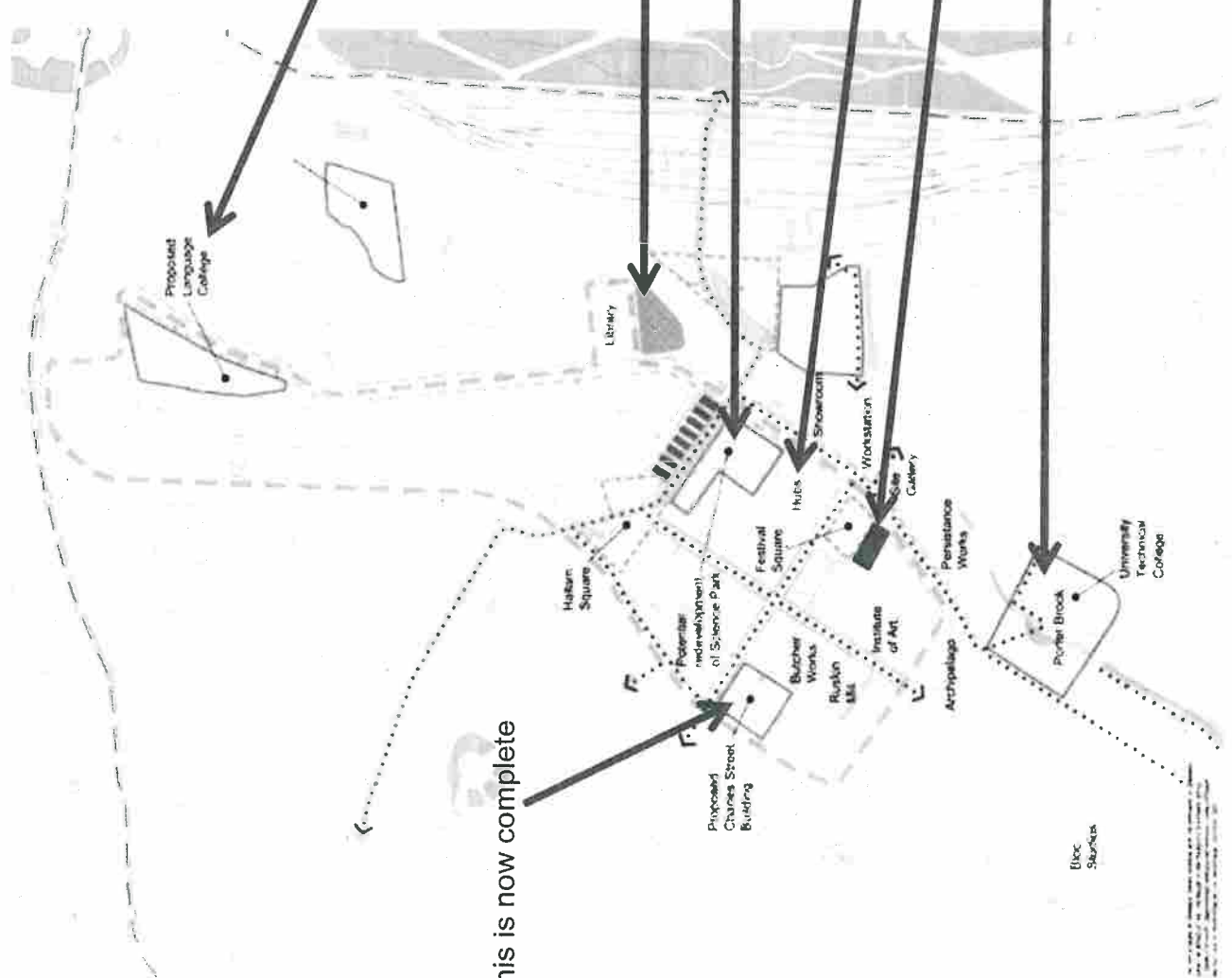


Proposed Sheaf Tower



Appendix 2

- University Related
 - Potential Redevelopment Site
 - Public Space
 - Public Realm Improvements
- Completed Public Realm Improvements
 - Hotels/Offices
 - Active Frontages
 - Mixed Use
- Gold Route
- Tram Route
- River/Water Feature
- Pedestrian Links



This is now the Institute of Arts

Proposed Sheaf Tower

Phase 1 of SHU Campus Masterplan - proposed new Business School and Social Sciences buildings

SHU Students Union

Spearmint Rhino

This is now complete

This is now complete

Appendix 3

4.3 Knowledge City

The transformation of Sheffield City Centre over the last twenty years has developed hand in hand with the growth of the higher education sector including its two world class universities, one of the largest FE colleges in Europe, Learn Direct the UK's largest provider of on-line study, the Source Retail Academy and the soon to open University Technical College. Each has expanded its activities in and around the central area.

They constitute a major part of the economy both at the higher level as suppliers to the knowledge industries, as well as massively stimulating the City Centre bringing vitality, footfall, diversity and spending power of 60,000 students each year. At the same time the city has given them a distinctive, stimulating, friendly and liveable home to which many graduates have responded by staying on.

Both universities have further ambitious building projects expected on site in 2013 - the UoS' New Engineering Building at Jessop, SHU's Development & Society Building at Charles St as well as residential language colleges such as that now proposed for the old Post Office at Fitzalan Square.

The new University Technical College at Porter Brook South in the CIQ will bring large numbers of school-age students into the City Centre to learn and train for careers in the Advanced Engineering, Manufacturing and Creative/Digital sectors, adding a new source of energy to the Cultural Industries Quarter.

Sheffield College is also considering seeking further accommodation in the City Centre and this requirement needs to be quantified and located.

With keen competition between universities the first impression, quality and distinctiveness of the campus is a vital component of success. Public spaces such as the Station Square, Barkers Pool, Weston Park and the Peace Gardens have given the city and the universities world class settings for their set-piece events but much remains to be done.

The Council will continue to work closely with each institution to ensure integration of each of the campus Master Plans with the greater City Centre Master Plan.

Where possible it will seek to co-ordinate improvements to the campus public realm with the Streets Ahead highway repair programme, as well as improvements to wayfinding, road safety and pedestrian connectivity.

In particular it will seek a closer understanding and sharing of the UoS campus ambitions and to build a partnership similar to that already in operation with SHU and the UTC.

The City Council will also investigate ways of supporting the key recruitment open days and graduation ceremonies for instance by use of Variable Message Signs's (VMS) to welcome visitors.

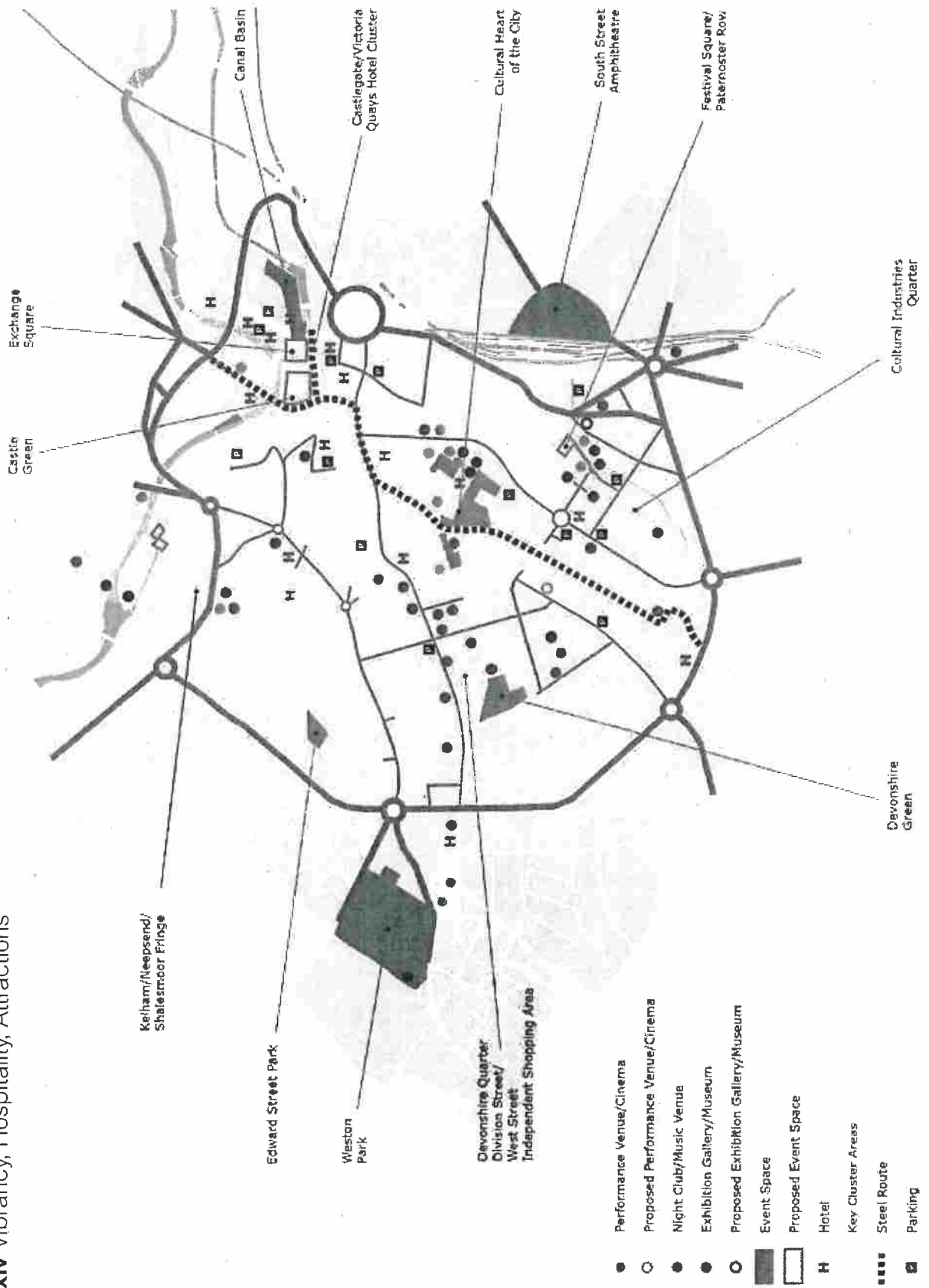
Both universities are now significantly involved in the events calendar of the City Centre as exemplified by the Food Festival, Tramlines and Festival of the Mind but there is more potential in this area which is now being developed.

There is a long history of successful joint research on urban issues by various university faculties but this has tended to only last for the period of a particular research grant or thesis. The potential to harness academic research capacity to analysing and tackling the city's challenges in a more systematic way and over longer time should now be seized.

Appendix 4

Sheffield City Centre Master Plan

Plan xiv Vibrancy, Hospitality, Attractions



Bower Claire

From: ([redacted])
Sent: 02 May 2018 12:46
To: licensingservice
Subject: Spearmint Rhino Licensing renewal objection

Dear Licensing

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

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

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

The Public Sector Equality Duty and Gender Equality

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

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

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

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

Kolvin continues with:

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

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

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

Location

In its current policy, the Council states:

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

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

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

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

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

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

c) a church or other place of religious worship;

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

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

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

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

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

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

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

Additional grounds for refusal

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

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

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

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

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

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

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

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

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

I look forward to hearing from you.





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

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

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

___ p. 90

Bower Claire

From: [REDACTED]
Sent: 02 May 2018 14:15
To: licensingservice
Subject: Objection letter to the license application of Spearmint Rhino - my call for the council to refuse it

Dear Licensing,

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

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

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

The Public Sector Equality Duty and Gender Equality

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

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

As Philip Kolvin (2010) cites the Royal Town Planning Institute's *Gender and Spatial Planning Good Practice Note: 'In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable'* [1]

Kolvin continues with:

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

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

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

Location

In its current policy, the Council states:

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

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

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

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

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

c) a church or other place of religious worship;

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

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

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

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

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

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

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

Additional grounds for refusal

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

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

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

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

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

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

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

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

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

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

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1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes that this is essential for ensuring transparency and accountability in the organization's operations.

2. The second part of the document outlines the specific procedures and protocols that must be followed when recording transactions. This includes details on how to categorize expenses, how to handle receipts, and how to ensure that all entries are properly documented and reviewed.

3. The third part of the document provides a detailed overview of the financial reporting process. It explains how the recorded data is used to generate various financial statements, such as the balance sheet, income statement, and cash flow statement, and how these statements are used to assess the organization's financial health.

4. The final part of the document discusses the role of internal controls in the financial reporting process. It highlights the importance of having strong internal controls in place to prevent errors and fraud, and to ensure that the financial information is reliable and accurate.

Bower Claire

From: customerservices@sheffield.gov.uk
Sent: 02 May 2018 14:25
To: licensingservice
Subject: 101004049718 -

Dear Colleagues,

Here is a copy of a customer enquiry we received within Customer Services for your attention.

Hi, I can't find details on this website of who to contact about a recent granting of a request for judicial review on licensing of strip clubs in Sheffield (regarding Spearmint Rhino). I would like to let the council know that I fully support Spearmint Rhino maintaining their license and vehemently oppose the arguments that strip clubs harm all women in society. To say strip clubs cause abuse to women everywhere is just mistaken, we are subject to that whether or not there are strip clubs in our city. Removing a safe workplace for a great many women without consulting with them on whether that is what they want and need is irresponsible at best and at worst will cause direct harm. To do so is not feminist. As a 22 year old female student at the University of Sheffield I've been subject to gender based violence/harassment in a great many contexts and ways but to say the existence of strip clubs (as a safe and regulated place for other women to work) harms me, instead of addressing broader issues that women of all backgrounds face, is absurd.

If you could direct me to someone who is involved in this matter or forward my relevant information/my views on, that would be greatly appreciated.

Many thanks,

Please could you reply to the customer as appropriate.

Customer Details:

[Redacted customer details] k

Many thanks for your co-operation and assistance with this matter.

Customer Services

Bower Claire

From: [REDACTED]
Sent: 02 May 2018 21:34
To: licensingservice
Subject: Spearmint Rhino

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: SPEARMINT RHINO

To whom it may concern,

I wish to register my strong objection to the renewal of the Sexual Entertainment Licence for Spearmint Rhino on Brown Street, Sheffield S1 2BS, on the grounds that allowing such a place in the Cultural Industries Quarter is highly inappropriate, having regard to the character of the area and the uses to which the premises are put. They are certainly not cultural. I'm sure visitors to our Cultural Industries Quarter are bemused, if not shocked, to see such an establishment in the centre of Sheffield. It makes us a laughing stock.

It is also inappropriate to have such a place so close to Sheffield Hallam University and the cafes where many students hang out.

Finally, I object to it being in an area I take my young grandsons to and to having to prevaricate about what it is and what goes on there, when they ask me about it.

Thank you,

[REDACTED]
[REDACTED]
[REDACTED]

Bower Claire

From: [REDACTED]
Sent: 02 May 2018 22:11
To: licensingservice
Subject: Objection to Spearmint Rhino licence renewal

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: SPEARMINT RHINO

Licensing Service
 Block C, Staniforth Road Depot
 Staniforth Road
 Surrey Street
 S9 3HD
 By email to: licensingservice@sheffield.gov.uk

2 May 2018

Dear Licensing

Objection to Spearmint Rhino licence renewal

I refer to the application for a sex establishment licence by Spearmint Rhino ("the club"), 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 2018 Sex Establishment Policy ("the Policy") on the following grounds:

Discretionary Ground d)**i) Character of the relevant locality**

a. the fact that the premises are sited in a residential area;

(d) the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families, including but not limited to educational establishments, leisure facilities such as parks, libraries or swimming pools, markets and covered markets;

(e) the premises are sited near places and or buildings of historical/cultural interest and other tourist attractions.

All of these apply.

ii) Use of other premises in the vicinity

The Licensing Authority will have regard to, but not limited to, the following:

- a. schools, nurseries or other premises substantially used by or for children under 18 years of age,
- b. parks or other recreational areas designed for use by or for children under 18 years of age;
- c. hospitals, mental health or disability centres, substance misuse treatment centres, sexual exploitation services, sexual abuse centres or similar premises;
- d. any central gateway to the city or other city landmark, historic building or tourist attraction;

(f) predominately residential areas;

(g) The Cultural Hub (Millennium Galleries, Tudor Square, theatres and library).

All of these apply

Further grounds for refusal**The Public Sector Equality Duty and Gender Equality**

The Council has an obligation to give due regard to the Public Sector Equality Duty which includes tackling gender inequality.

I believe that sex establishments such as Spearmint Rhino contribute significantly to discrimination against women, normalising objectification.

A culture in which (mostly) men feel it is normal to buy sexual access to (mostly) women is one in which the message is promoted that access to women's bodies can be purchased; that women's reluctance to engage sexually can be overcome by payment. This is the same culture in which many still believe that expenditure, such as paying for dinner, entitles a man to sex. This normalisation of payment for access to women's bodies directly contributes to rape culture.

Licensing a venue such as this is incompatible with the need to eliminate discrimination and promote good relations and equality of opportunity within the Public Sector Equality Duty.

I look forward to hearing from you.

[Redacted]

[Redacted]

Bower Claire

From: [REDACTED]
Sent: 03 May 2018 11:28
To: licensingservice
Subject: Spearmint Rhino

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: SPEARMINT RHINO

Spearmint Rhino should not have premises in Sheffield.

A Labour Council should not agree to their license or its renewal.

It is a sex club. Sex clubs encourage / foster violence against women. Their very nature leads to an objectification of women as purely sexual objects to be used and paid for by men. This is 2018.

Is this Sheffield Council's view of women? Is this the Labour Party's view?

Sheffield does not need this club.

Many women find the existence of such clubs threatening. To walk past it is a very difficult and challenging experience and it is in the student area of town. It poses a threat to all women.

Women who work there have little or no choice about their employment. Do they have rights / a Trade Union?

They only work there because they have to.

Make Sheffield a Spearmint Rhino free zone. Make us proud.

I object to the application by Sonfield Dev LTD 161 Tottenham Court Rd London.

I support Zero Option Sheffield.

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:

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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.

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

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

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

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

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

c) a church or other place of religious worship;

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

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

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

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

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

The area which the club is in is marketed by the Council as the "Cultural Quarter" - it is directly opposite the Showroom cinema which hosts family events. It is also opposite the Site Gallery which is undergoing a huge expansion. Spearmint Rhino is also

centrally located in terms of proximity to a number of national and international events locations, as well as a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc. There are young students surrounding the area. The Club is next to Sheffield Hallam Students Union and directly backs onto student accommodation.

Additional grounds for refusal

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

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

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

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

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

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

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

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

I look forward to hearing from you.

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

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

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

[4] p. 90

Licensing Service
Block C, Staniforth Road Depot
Staniforth Road
Surrey Street
S9 3HD
By email to: licensing@sheffield.gov.uk

4 May 2018

Dear Licensing

Objection to Spearmint Rhino licence renewal

I refer to the application for a sex establishment licence by Spearmint Rhino ("the club"), 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 2018 Sex Establishment Policy ("the Policy") on the following grounds:

Discretionary Ground d)

i) Character of the relevant locality

(a) the fact that the premises are sited in a residential area;

The club backs onto student accommodation and the area is increasingly becoming more residential for students and non-students alike.

The city centre's residential population had risen from 6,000 to 30,000 over the last 10 years with further plans for more residential accommodation within the Cultural Industries Quarter (CIQ) and Knowledge Gateway. Furthermore, "the Alsop Fields development is a mix of residential apartments, studios, offices for the high-tech and creative sectors and places to eat and drink" and "... designed to be a destination in itself – a regeneration of part of the Cultural Industries Quarter that will be similar to the trendy parts of Manchester and London" for which Brown Street and Paternoster Row are the main thoroughfares.

(d) the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families, including but not limited to educational establishments, leisure facilities such as parks, libraries or swimming pools, markets and covered markets;

The Showroom and adjacent Work Station are frequented by families and both host events specifically for children including the world renown Children's Media Conference.

(e) the premises are sited near places and or buildings of historical/cultural interest and other tourist attractions.

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."

It is also opposite the Site Gallery which has just undergone 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 aforementioned Children's Media Conference; Off the Shelf etc all of which are tourist attractions.

The club is next to Sheffield Hallam Students Union (an iconic and a city landmark building).

ii) Use of other premises in the vicinity

The Licensing Authority will have regard to, but not limited to, the following

(a) schools, nurseries or other premises substantially used by or for children under 18 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 which provides education for 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 at the epicentre of the designated “Knowledge Gateway” and located on Sheffield Hallam University’s city campus whose masterplan is to further develop the area which includes “new buildings for the Business School and social sciences, refurbishing the Students’ Union building known as The HUBS, creating a University Green [Festival/CIQ Square] and improving our current estate.”

(b) parks or other recreational areas designed for use by or for children under 18 years of age;
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) is directly adjacent to the club and the club’s presence is holding back further use and development of this space into its full potential.

(c) hospitals, mental health or disability centres, substance misuse treatment centres, sexual exploitation services, sexual abuse centres or similar premises;
There are a number of charities and organisations in the area which support vulnerable children, young people and adults, one of which is situated directly behind the club. Charles Street is a direct access route from the bus stop on Arundel Gate and the car park on Arundel Street; direct access from both means that service users pass directly past the club through the unused and desolate Festival/CIQ Square.

(d) any central gateway to the city or other city landmark, historic building or tourist attraction;
See (e) under (i).

(f) predominantly residential areas;

See (a) under (i)

(g) The Cultural Hub (Millennium Galleries, Tudor Square, theatres and library).

The location of the club is a de facto “cultural hub” given it is named the Cultural Industries Quarter. It is also on the direct access route to the 24/7 Addsetts learning centre from numerous student accommodation blocks in the immediate vicinity, which many will be accessed during the club’s opening hours.

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

The building, despite the removal of signage during its closed hours, is a blacked out sinister presence incongruous with its surroundings and clearly marked buildings. Removal of the signage is “a sticking plaster to a gaping wound” approach by Licensing. Regardless of whether the club’s signage is visible in the day, it is widely known what the building is. Those who are not familiar with the building’s use visiting SHU on open days and viewing properties in the vicinity during the day will be unable to make an informed decision about moving into an area with a sex establishment on the doorstep.

Furthermore, the building could be put to a different use serving a far more diverse and greater number of people thereby enriching the CIQ in a far more inclusive and compatible way.

Further grounds for refusal

The Public Sector Equality Duty and Gender Equality

The Policy states under the heading “The Equality Act 2010”:

This Act legally protects people from discrimination in the workplace and wider society. This includes the Public Sector Equality Duty (PSED), which means that the Council must thoroughly consider, in the discharge its licensing functions, the need to:

- promote equality of opportunity;
- eliminate unlawful discrimination, harassment and victimisation;
- promote good relations.

This applies for this policy and to the consideration and determination of applications for sex establishments.
(p.5)

I believe that sex establishments such as Spearmint Rhino directly discriminate against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. A 2016 review highlights how these venues undermine women's equality:

"Thus, in objectifying media women's role as a source of male sexual pleasure is emphasised and their humanity is de-emphasised. After having internalised the messages of male sexual privilege and female dehumanisation, it should be easier for men to envision imposing themselves sexually on women and reacting punitively to women who frustrate their sexual goals."

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 sex establishments to be licensed in specific areas – subject to the choices of the local communities.

The Policy further states that:

Licences will be refused if the Licensing Authority perceives a venue will have negative impacts on members of the public or vulnerable persons living, working or engaged in normal activity in the area.

Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections, including LGBT women and disabled women. In 2017, many examples of the negative impact of this club were given in objections, for example: one woman giving up her studio at Yorkshire Artspace and a contributory factor was the presence of the club and "running the gauntlet of men hanging around outside the club and harassing women." (objection 12) and others have stated how the club impacts on their business at hearings and in writing. As Philip Kolvin (2010) cites the Royal Town Planning Institute's Gender and Spatial Planning Good Practice Note: "In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable"

Kolvin continues with:

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

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

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

In addition to an Australian article about women and girls' perceptions of safety in urban spaces highlights how they restrict their freedom of movement to avoid zones where there are strip clubs.

Lap dancing clubs also reinforce negative 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 2016 by Zero Option at the Villa Mercedes hearing representation and its 2017 oral representation at the hearing.

In their UK study published in 2011 Sanders and Hardy 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 many testimonies of former performers.

The Policy states that "The Licensing Authority will also consider the following factors when deciding if an application is appropriate":

(b) proximity to areas with high levels of crime;

On 22nd February 2018, it was reported in the Star that Arundel Gate which runs in parallel to Paternoster Row and is approximately 1-2 minutes on foot away depending on walking pace, is 10th in the top 10 areas of crime in the city and that "These offences, including assaults, robberies and sex attacks on women, were recorded between January and November 2017."

This image of a high-end establishment portrayed by this club 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 Committee 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.

According to the BBC, lap dancing clubs have fallen by a third in England. The same report states that “a survey conducted by YouGov in 2015 found 64% of people in Great Britain said strip clubs were a negative part of British culture.”

I ask that the Committee refuses to grant the club a licence for all the reasons outlined and because Spearmint Rhino is anachronistic, it gives Sheffield and our much vaunted CIQ a negative image and may deter investors and developers. At a time when we are hoping to attract large investors and are bidding for Channel 4 to relocate in the vicinity, the Committee needs to turn down this licence application, which it is empowered to do.

I look forward to hearing from you.

Yours faithfully

[Redacted signature block]

Licensing Service
 Block C, Staniforth Road Depot
 Staniforth Road
 Surrey Street
 S9 3HD
 By email to: licensing@sheffield.gov.uk

04/05/2018

Dear Licensing

Objection to Spearmint Rhino licence renewal

I refer to the application for a sex establishment licence by Spearmint Rhino ("the club"), 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 2018 Sex Establishment Policy ("the Policy") on the following grounds:

Discretionary Ground d)

i) Character of the relevant locality

(a) the fact that the premises are sited in a residential area;

The club backs onto student accommodation and the area is increasingly becoming more residential for students and non-students alike.

The city centre's residential population had risen from 6,000 to 30,000 over the last 10 yearsⁱ with further plans for more residential accommodation within the Cultural Industries Quarter (CIQ) and Knowledge Gateway. Furthermore, "the Alsop Fields development is a mix of residential apartments, studios, offices for the high-tech and creative sectors and places to eat and drink" and ". . . designed to be a destination in itself – a regeneration of part of the Cultural Industries Quarter that will be similar to the trendy parts of Manchester and London"ⁱⁱ for which Brown Street and Paternoster Row are the main thoroughfares.

(d) the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families, including but not limited to educational establishments, leisure facilities such as parks, libraries or swimming pools, markets and covered markets;

The Showroom and adjacent Work Station are frequented by families and both host events specifically for children including the world renown Children's Media Conference.

(e) the premises are sited near places and or buildings of historical/cultural interest and other tourist attractions.

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."

It is also opposite the Site Gallery which has just undergone 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 aforementioned Children's Media Conference; Off the Shelf etc all of which are tourist attractions.

The club is next to Sheffield Hallam Students Union (iconic and a city landmark building).

ii) Use of other premises in the vicinity

The Licensing Authority will have regard to, but not limited to, the following:

(a) schools, nurseries or other premises substantially used by or for children under 18 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 which provides education for 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 at the epicentre of the designated "Knowledge Gateway" and located on Sheffield Hallam University's city campus whose masterplan is to further develop the area, which includes "new buildings for the Business School and social sciences, refurbishing the Students' Union building known as The HUBS, creating a University Green [Festival/CIQ Square] and improving our current estate."ⁱⁱⁱ

(b) parks or other recreational areas designed for use by or for children under 18 years of age;

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) is directly adjacent to the club and the club's presence is holding back further use and development of this space into its full potential.

(c) hospitals, mental health or disability centres, substance misuse treatment centres, sexual exploitation services, sexual abuse centres or similar premises;

There are a number of charities and organisations in the area which support vulnerable children, young people and adults, one of which is situated directly behind the club. Charles Street is a direct access route from the bus stop on Arundel Gate and the car park on Arundel Street; direct access from both means that service users pass directly past the club through the unused and desolate Festival/CIQ Square.

(d) any central gateway to the city or other city landmark, historic building or tourist attraction;

See (e) under (i).

(f) predominately residential areas;

See (a) under (i)

(g) The Cultural Hub (Millennium Galleries, Tudor Square, theatres and library).

The location of the club is a de facto “cultural hub” given it is named the Cultural Industries Quarter. It is also on the direct access route to the 24/7 Addsetts learning centre from numerous student accommodation blocks in the immediate vicinity, which many will be accessing during the club’s opening hours.

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

The building, despite the removal of signage during its closed hours, is a blacked out sinister presence incongruous with its surroundings and clearly marked buildings. Removal of the signage is “a sticking plaster to a gaping wound” approach by Licensing. Regardless of whether the club’s signage is visible in the day, it is widely known what the building is. Those who are not familiar with the building’s use visiting SHU on open days and viewing properties in the vicinity during the day will be unable to make an informed decision about moving into an area with a sex establishment on the doorstep.

Furthermore, the building could be put to a different use serving a far more diverse and greater number of people thereby enriching the CIQ in a more inclusive and compatible way.

Further grounds for refusal

The Public Sector Equality Duty and Gender Equality

The Policy states under the heading “The Equality Act 2010”:

“This Act legally protects people from discrimination in the workplace and wider society. This includes the Public Sector Equality Duty (PSED), which means that the Council must thoroughly consider, in the discharge of its licensing functions, the need to:

- promote equality of opportunity;
- eliminate unlawful discrimination, harassment and victimisation;
- promote good relations”.

This applies for this policy and to the consideration and determination of applications for sex establishments. (p.5)

I believe that sex establishments such as Spearmint Rhino directly discriminate against women by normalising the sexualisation and objectification of women, and that this contributes to their sexualisation and objectification in other areas of society. A 2016 review highlights how these venues undermine women’s equality:

“Thus, in objectifying media women’s role as a source of male sexual pleasure is emphasized and their humanity is deemphasized. After having internalized the messages of male sexual privilege and female dehumanization, it should be easier for men to envision imposing themselves sexually on women and reacting punitively to women who frustrate their sexual goals.”^{iv}

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 sex establishments to be licensed in specific areas – subject to the choices of the local communities.

The Policy further states that:

"Licences will be refused if the Licensing Authority perceives a venue will have negative impacts on members of the public or vulnerable persons living, working or engaged in normal activity in the area".

Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections, including LGBT women and disabled women. In 2017, many examples of the negative impact of this club were given in objections, for example: one woman giving up her studio at Yorkshire Artspace and a contributory factor was the presence of the club and "running the gauntlet of men hanging around outside the club and harassing women." (objection 12) and others have stated how the club impacts on their business at hearings and in writing.^v

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"^{vi}

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"^{vii}.

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."^{viii}

In addition an Australian article about women and girls' perceptions of safety in urban spaces highlights how they restrict their freedom of movement to avoid zones where there are strip clubs.^{ix}

Lap dancing clubs also reinforce negative gender stereotypes of male insatiable sexuality and female sexual availability which are hugely damaging to both sexes and to non-binary people. The stereotypes upon which they are founded do not foster good relations between the sexes, as evidenced in 2016 by Zero Option at the Villa Mercedes hearing representation and its 2017 oral representation at the hearing^x.

In their UK study published in 2011 Sanders and Hardy^{xi} 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 many testimonies of former performers.

The Policy states that "The Licensing Authority will also consider the following factors when deciding if an application is appropriate":

(b) proximity to areas with high levels of crime;

On 22nd February 2018, it was reported in the Star that Arundel Gate which runs in parallel to Paternoster Row and is approximately 1-2 minutes on foot away depending on walking pace, is 10th in the top 10 areas of crime in the city and that "These offences, including assaults, robberies and sex attacks on women, were recorded between January and November 2017."^{xii}

This image of a high-end establishment portrayed by this club 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 Committee 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."^{xiii}

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.

According to the BBC, the number of lap dancing clubs has fallen by a third in England^{xiv}. The same report states that "a survey conducted by YouGov in 2015 found 64% of people in Great Britain said strip clubs were a negative part of British culture." I ask that the Committee refuse to grant the club a licence for all the reasons outlined and because Spearmint Rhino is anachronistic, it gives Sheffield and our much vaunted CIQ a negative image and may deter investors and developers. At a time when we are hoping to attract large investors and are bidding for Channel 4 to relocate in the vicinity, the Committee needs to turn down this licence application, which it is empowered to do.

I would further like to add that although I have only been visiting Sheffield from South Africa on a twice annual basis I will be returning for good in June 2018 and have been looking forward to being able to walk round the city as this is something I cannot do in South Africa and the presence of Spearmint Rhino puts me off using any of the amenities and facilities in the cultural industries quarter.

I look forward to hearing from you.

Address as of 30th June 2018

REFERENCES:

¹Sheffield Star 16th January 2018 *Dramatic rise in the number of people living in Sheffield city centre* Available from: <https://www.thestar.co.uk/news/dramatic-rise-in-the-number-of-people-living-in-sheffield-city-centre-1-8960059>

¹ Sheffield Chamber of Commerce *Sheffield's Cultural Industries Quarter expansion in £10m City Estates project* Available from: <https://www.scci.org.uk/2017/03/sheffields-cultural-industries-quarter-expansion-in-10m-city-estates-project/>

¹ Sheffield Hallam University 22nd February 2018 *New campus masterplan places Hallam at the heart of the city* Available from: <http://www4.shu.ac.uk/mediacentre/new-campus-masterplan-places-hallam-heart-city>

¹ Wright, P.J & Tokunaga, R.S (2016) Men's Objectifying Media Consumption, Objectification of Women,

and Attitudes Supportive of Violence Against Women in *Archives of Sexual Behavior*

¹ *Zero Option oral representation at the Spearmint Rhino hearing April 2017* Available from: <https://zerooptionblog.wordpress.com/2017/04/14/zero-options-representation-at-the-spearmint-rhino-licence-renewal-hearing-11th-april-2017/#more-524>

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

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

¹ 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.

¹ Safe in the City? Girls tell it like it is. March 26, 2017 <https://theconversation.com/safe-in-the-city-girls-tell-it-like-it-is-72975>.

¹ Slideshare available from: <https://www.slideshare.net/ZerooptionSheffield/villa-mercedes-hearing-8th-september-2016>

¹ Sanders, T., & Hardy, K. (2011) *The Regulatory Dance: Sexual Consumption in the Night Time Economy – Initial Findings*. Leeds: University of Leeds

¹ Sheffield Star 22nd February 2018 Available from: <https://www.thestar.co.uk/news/listed-these-are-the-10-most-crime-ridden-streets-in-sheffield-1-9030246>

¹ Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.90

¹ 23rd February 2018 Available from:

ⁱSheffield Star 16th January 2018 *Dramatic rise in the number of people living in Sheffield city centre* Available from: <https://www.thestar.co.uk/news/dramatic-rise-in-the-number-of-people-living-in-sheffield-city-centre-1-8960059>

ⁱⁱ Sheffield Chamber of Commerce *Sheffield's Cultural Industries Quarter expansion in £10m City Estates project* Available from: <https://www.scci.org.uk/2017/03/sheffields-cultural-industries-quarter-expansion-in-10m-city-estates-project/>

ⁱⁱⁱ Sheffield Hallam University 22nd February 2018 *New campus masterplan places Hallam at the heart of the city* Available from: <http://www4.shu.ac.uk/mediacentre/new-campus-masterplan-places-hallam-heart-city>

^{iv} Wright, P.J & Tokunaga, R.S (2016) Men's Objectifying Media Consumption, Objectification of Women,

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^v *Zero Option oral representation at the Spearmint Rhino hearing April 2017* Available from: <https://zerooptionblog.wordpress.com/2017/04/14/zero-options-representation-at-the-spearmint-rhino-licence-renewal-hearing-11th-april-2017/#more-524>

^{vi} Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

^{vii} Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

^{viii} 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.

^{ix} Safe in the City? Girls tell it like it is. March 26, 2017 <https://theconversation.com/safe-in-the-city-girls-tell-it-like-it-is-72975>.

^x Slideshare available from: <https://www.slideshare.net/ZerooptionSheffield/villa-mercedes-hearing-8th-september-2016>

^{xi} Sanders, T., & Hardy, K. (2011) *The Regulatory Dance: Sexual Consumption in the Night Time Economy – Initial Findings*. Leeds: University of Leeds

^{xii} Sheffield Star 22nd February 2018 Available from: <https://www.thestar.co.uk/news/listed-these-are-the-10-most-crime-ridden-streets-in-sheffield-1-9030246>

^{xiii} Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.90

^{xiv} 23rd February 2018 Available from: <http://www.bbc.co.uk/news/uk-england-43043842>

