

**Bower Claire**

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**From:** [REDACTED]  
**Sent:** 15 May 2018 18:30  
**To:** licensingservice  
**Subject:** Objection to Spearmint Rhino Licensing  
**Attachments:** SR Objection Not Buying It Rakoff.pdf; ATT00001.htm; ATT00002.htm

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** SPEARMINT RHINO

Additional Information just received:

I just received this from a woman working in the industry, who wishes to remain anonymous. Please can this be added as an appendix to my original objection (also attached). Thank you:

"I was 27 when I started lap dancing. I was introduced to it by my husband at the time. After the first dance I was physically sick. I rang my husband and told him I wanted to come home but he said I needed to make money before I came home. It is a degrading job.

You think your in control but that's not true. I was then introduced to cocaine when I worked at Rhinos it blocked out the reality of what I was actually doing. The more I worked the more cocaine I took.

These clubs are aware of the drug taking that goes on and they turn a blind eye. I was introduced to a lot of nasty people while I was dancing because these clubs allow drug dealers and gang members to come in. This is because of the money they spend. I am now 45 and would be devastated If my daughters were to choose this job. It ruins lives and I am proof of this."

Former Lap Dancer, [REDACTED]



## Objection to Sheffield Spearmint Rhino Licensing Renewal by [REDACTED], Not Buying It

### Recommendations:

- Refuse this license on grounds of locality and breach of PSED
- Provide Exit Strategies for women working at the Club
- This to be funded by ending costly court proceedings to justify the licensing of the industry  
This must be running close to £100,000. Use this money instead to support performers with training, placements, encouraging flexible work options at other businesses etc.

### If not, Impose Additional Conditions (as other councils have done):

- All dancers to be PAYE with guaranteed minimum wage and employment rights
- NO Private booths or areas of any sort
- A maximum dancer : punter ratio
- Implement other conditions  
such as Proper changing facilities/ separate exit door from punters/escorted out of premises at end of shift/ direct anonymous channel of complain and whistle blowing to council or other authority etc???

I visit Sheffield with meetings at The Showroom which is like Grand Central – everyone seems to meet everyone there. It is a few minutes from the railway station and almost directly opposite Spearmint Rhino.

I have been challenging the organised sex industry, including strip clubs, for many years because of the high level of harm associated with it. I previously ran the pressure group Object, which ensured law change to stop strip clubs being licensed like cafés or other leisure venues. During this time I have spoken with many women who have left the industry and am aware of a wealth of evidence as to the harm of this industry.

All the evidence and information given here can be found at:  
<http://www.notbuyingit.org.uk/publications#Strip>

## Location breaches Licensing Policy

Members considered whether or not the premises was inappropriate having regard to the locality and determined that it is not. Spearmint Rhino Written Determination Notice 2017

No doubt you have heard in depth evidence from locals, familiar with the area, as to exactly how inappropriate this strip club's siting is in terms of its location – where it is clearly in breach of your own licensing policy, on every count. So it is seems somewhat staggering that Council members are able to twist this breach into compatibility.

The premises is well run with no complaints known to the licensing authority or the premises.

Again this seems very carefully worded. Surely objections at licensing hearings are 'complaints'? And they have been 100s of objections over the years about this venue.

## Legally Binding Equality Duties

Here, I would like to focus on the council's *legally binding* Public Sector Equality Duties (PSED):

[https://www.equalityhumanrights.com/sites/default/files/technical\\_guidance\\_on\\_the\\_psed\\_england.pdf](https://www.equalityhumanrights.com/sites/default/files/technical_guidance_on_the_psed_england.pdf)  
<https://www.equalityhumanrights.com/en/publication-download/essential-guide-public-sector-equality-duty>

Under this Councils must have due regard to:

- **ELIMINATE harassment, discrimination and victimisation' of women**
- **Advance Equality of Opportunity between men and women**
- **Foster Good Relations between men and women**

In addition:

- **The greeter the relevance and potential impact, the higher the regard for the duty**

Obviously, when considering the lap dancing industry, this duty is particularly high.

## The Right to Look at Licensing Applications with 'Fresh Eyes'

The Council has already *conceded* that it had *breached* the PSED because of the manner in which it previously granted Spearmint Rhino strip club a license. It is therefore, clearly imperative that the Council revisits how it arrives at its licensing decision this time or it will again be acting unlawfully.

In other words, the Council **MUST look at its licensing decision 'with fresh eyes'**. In fact the PSED technical guidance specifically states:

The duty requires relevant bodies to tackle the consequences of **past decisions** which failed to give due regard to the equality aims.

I know that barristers representing the strip industry like to inform Councils 'that if a license has previously been granted, it must be re-granted' but this is not even an accurate reflection of licensing law, let alone the PSED.

Councils may ALWAYS revisit past licensing decisions. All they need do is take into account that a license was previously granted. And this has been confirmed in law on more than one occasion, including by licensing expert Philip Kolvin QC, who frequently serves as representative for Spearmint Rhino and other strip club chains :

"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.**"

Case law also confirms this right. A review of recent judgements for the Local Government Lawyer website by Philip Kolvin, QC, and two other eminent barristers concludes:

**'In two recent decisions the courts have affirmed the wide powers enjoyed by licensing authorities to refuse renewals of licences for lap dancing clubs'**

[http://www.localgovernmentlawyer.co.uk/index.php?option=com\\_content&view=article&id=17968%3Alap-dance-no-more&catid=49%3Acomment-a-analysis-articles&Itemid=1](http://www.localgovernmentlawyer.co.uk/index.php?option=com_content&view=article&id=17968%3Alap-dance-no-more&catid=49%3Acomment-a-analysis-articles&Itemid=1)

This is again confirmed by Mr Justice Turner:

**'It is, in my judgment, an inescapable fact that the Act of 1982 expressly contemplates the possibility that the circumstances in which a licence had been granted or renewed might change; hence the provisions of paragraph 12 of the 3<sup>rd</sup> Schedule, which apply not just in respect of the grant but, more importantly, also on the renewal of a licence. Thus the proposition that an existing licence holder can expect that he will be granted a licence in perpetuity for any given set of premises is plainly wrong'.**

Furthermore, license renewal applications may be refused even when there has been *no change* to either the licensee or the surrounding area:

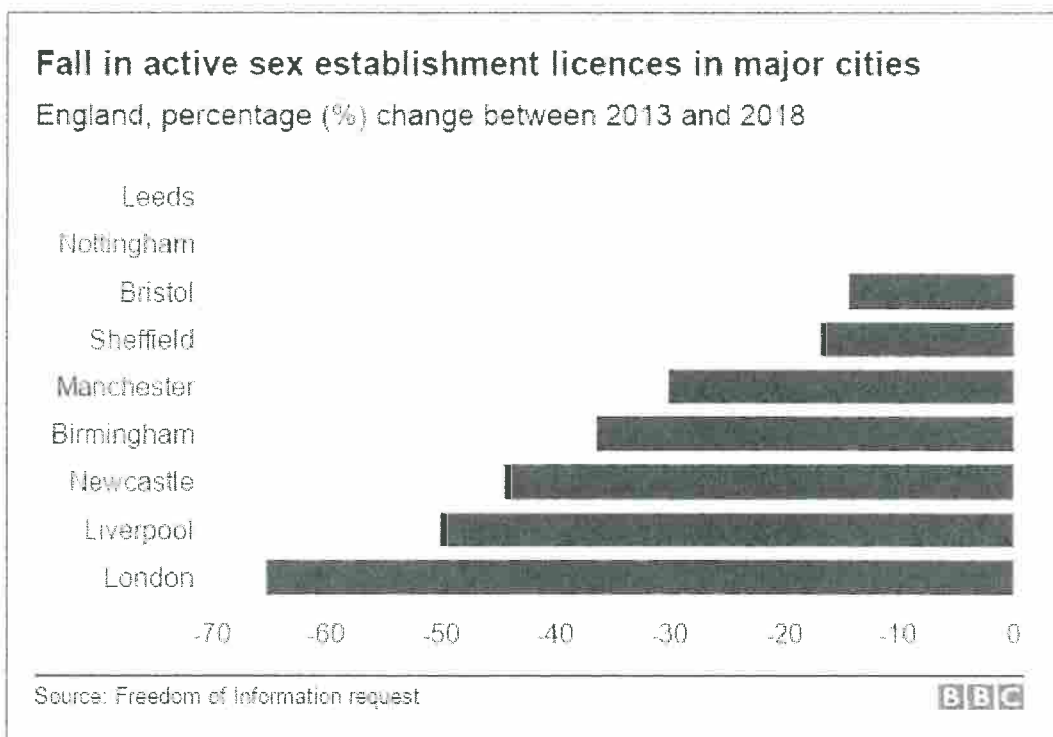
licensing authorities are entitled to 'have a fresh look' at an application for renewal of an SEV licence, and may refuse to renew even when there is no material change in circumstance.'

[http://www.localgovernmentlawyer.co.uk/index.php?option=com\\_content&view=article&id=17968%3Alap-dance-no-more&catid=49%3Acomment-a-analysis-articles&Itemid=1](http://www.localgovernmentlawyer.co.uk/index.php?option=com_content&view=article&id=17968%3Alap-dance-no-more&catid=49%3Acomment-a-analysis-articles&Itemid=1)

Again, given that Council has conceded that its previous licensing decision to grant the club a license was *made illegally*, the Council is now absolutely beholden to look at this license with new eyes.

### Other Councils are *NOT* re-granting Licenses

Furthermore a precedent for *not* re-granting licenses has been set on numerous occasions since a great many other councils now have not re-granted strip club licenses. In fact, the number of licenses of strip clubs and sex establishments is reported to have fallen by 1/3: <http://www.bbc.co.uk/news/uk-england-43043842> :



In the overwhelming majority of cases, this has passed without incident, ie without legal challenge by strip club operators.

In fact, Sheffield seems to be the only city I know of that currently seems intent on introducing a 'no limit' policy, likely to substantially *expand* its lap dancing industry.

## Unfounded Fear of Legal Challenge by the Strip Industry

It has become obvious over the years, that one of the reasons Councils grant strip club licenses is because of fear of legal challenge by strip industry operators.

Even an ex-Sheffield Councillor has stated that the legal advice given to councillors was to automatically grant license or they would be taken to court and lose.



Geoff Smith  
@geoffforcrookes

Replying to @NotBuyingItShef and @Nik14NetherEdge

Interesting to see what happens. Our legal advice as councillors was always that if we refused to renew the licence it would be challenged and we would lose the case.

2:09 pm · 26 Apr 18

However, we have not found a SINGLE case where a strip club operator has mounted a successful legal challenge against a council for failing to grant a license. This includes numerous occasions where licenses have not been *re-granted*:

### **Camden: Camden Council vs The Red Rooms**

Camden Council took The Red Rooms strip club to High Court to argue its right to allow no private areas. Council won.

### **Leeds: [Bean Leisure vs Leeds City Council](#) [2014]**

Two clubs lose in High Court challenge to Council's refusal to renew licenses

### **Leicester: [Lily's Lounge Leicester](#) [2016]**

SEV took council to court for refusing to renew license. SEV no longer operating.

### **Oxford: ['The Lodge' Thompson, R \(On the Application Of\) v Oxford City Council](#) [2014]**

Court of Appeal upholds Council decision not to renew license.

### **South Bucks: [R \(KVP ENT LTD\) v South Bucks DC](#) [2013]**

SEV not even given leave to go to Judicial Review when license was not renewed

The only incident where a Judge ruled in favour of an SEV (strip club) was on a technicality (too many councillors had been involved in the decision):

### **Cheshire: [Bridgerow Ltd, R \(on the application of\) v Cheshire West and Chester Borough Council](#) [2014]**

In fact the judge explicitly pointed out that in all other respects he agreed *with* the Council. The club in question shut within a year of this case.

## Breach of the PSED – Disregarding Concerns as ‘Moralistic’

The Council appears to have been largely guided by evidence and research from highly biased sources, from strip club operators (problematic as outlined throughout) to pro-industry researchers, including self-professed fans of the strip industry like Colosi, PhD.

These researchers, without fail, denigrate genuine concerns for the sex and strip industry as ‘moralistic’. Even researchers like Sanders, who expose the abuse within the industry, still assert that the opposition that might reasonably arise from these findings is driven by ‘morality’ rather than the fact that it could reasonably be concluded that the industry itself is corrupt and incompatible with equality and human rights.

But crediting concerns with the industry as merely ‘moralistic’ was a key reason Judicial Review was granted against Sheffield City Council's previous decision to re-license Spearmint Rhino:

.. There is a tenable basis for the Claimant’s inference that the Defendant [Sheffield City Council] has **wrongly ignored objections** based the potential impact on gender equality treating them as **moral objections** and irrelevant.”

Judge’s observation when granting permission for Judicial Review:  
Honourable Mrs Justice Nerys Jefford, DBE, Justice at High Court Queen’s Branch Division, 2016

Surely the council needs to now exercise considerable caution not to make the same mistakes again – and must not treat genuine, tangible and demonstrable concerns over the harm of lap dancing as ‘moralising’. Similarly it must take heed to take into account the bias of pro-industry ‘morality’ of many sex industry advocates.

## Breach of the PSED - Poor Understanding of the Reality of the Industry

Another reason Councils grant licenses is because of a serious lack of understanding of the industry and an apparent refusal to listen to the large body of evidence of harm across the industry. **This lack of understanding also gives grounds to challenge under equality law.** It also means the council is putting young dancers at particular risk.

That is why, again, it is imperative Sheffield City Council strives to understand the reality of this industry. I have been concerned that the information and research that the council is relying on appears to have come entirely from advocates of the strip industry and sex trade – whether from industry representatives or academics. Just two examples of misinformation are given below:

**‘lap dancing  
is not sexual’**

When SEV licensing was first being considered, strip industry reps were lining up claiming *‘lap dancing is not sexual’* in the press and even at Parliamentary Select Committee Hearings. You must remember that this industry twists the truth or openly lies at every opportunity.

Likewise, one of the only major studies of the industry in the UK exposed how all strip club operators claimed their establishments were perfectly well run, while pointing the finger at every other as being poorly run and constantly rule breaking:

<http://www.notbuyingit.org.uk/sites/default/files/PrivateBooths.pdf> .

## Breach of the PSED – Discriminatory Working Conditions

Members considered the representations raised that the dancers at Spearmint Rhino are suffering as a result of unfair and unequal working conditions. The arrangements in place are legal and entered into with full knowledge and consent.  
Spearmint Rhino Written Determination Notice  
2017

Members further considered the three aims under PSED and determined that they needed to ensure that the worker's rights were being enforced, and especially that equality of opportunity between different groups is being advanced.

They had a statement from the Safeguarding Board saying that there were no concerns about welfare and no complaints had been received however thought it proportionate to condition that the premises be subject to quarterly inspections to ensure these are being complied with. This would be evidence that could be used at the next renewal application.

Lap dancers (women) are the only workers at strip clubs who are 'self employed' and do not receive any work security or rights, unlike all other staff (the overwhelming majority of whom are men)

These working conditions are:

- **Pay to work in the venue**
- **Pay a portion of takings back to the venue**
- **Buy expensive 'house clothes'**
- **Fines at every opportunity**
- **Being forced to buy drinks**
- **Far too high a ratio of performers to punters (making it hard for any individual to earn enough money to even break even by the end of her shift)**
- **No sick pay/maternity or other PAYE benefits**
- **No job security or guarantee of income**

"I frequently was only making enough to cover the house fee, train tickets and the cost of a bed and breakfast with no extra profit for myself " Liz

[www.notbuyingit.org.uk/publications#Strip](http://www.notbuyingit.org.uk/publications#Strip)

70% of lap dancers make no money by the end of their shift

Sanders: [www.sociology.leeds.ac.uk/assets/files/research/Regulatory\\_Dance/FINALSUMMARYJAN2012.pdf](http://www.sociology.leeds.ac.uk/assets/files/research/Regulatory_Dance/FINALSUMMARYJAN2012.pdf)

Do members of the council think these conditions are *fair*? Do they think any individual who was *genuinely empowered* would enter into work conditions like this with full *knowledge and consent*? Do they think leaving a shift in debt or having made no money is not *suffering*? How can *quarterly inspections* eradicate the basic working model of strip clubs – these are businesses which only exist because of young women ('product') and yet treats them in the most financially abusive manner imaginable.

These employment conditions are clearly unfair and unequal and can be seen as a breach of the PSED. They are also a driving force for the far more sinister abuse found across the industry – coercion, sexual abuse and exploitation.



## Breach of the PSED – Abuse and Exploitation in Clubs

Members further considered the three aims under PSED and determined that they needed to ensure that the worker's rights were being enforced, and especially that equality of opportunity between different groups is being advanced. They had a statement from the Safeguarding Board saying that there were no concerns about welfare and no complaints had been received however thought it proportionate to condition that the premises be subject to quarterly inspections to ensure these are being complied with. This would be evidence that could be used at the next renewal application.

Lap dancing is synonymous with harassment and victimisation of performers ie breach of the PSED:  
<http://www.notbuyingit.org.uk/publications#Strip>:

“Customers .. would touch me and grab me and one even bit me during a dance”

Liz

“Sexual contact becomes the norm. You start to sell yourself out.

Vicky

“There’s a rule regarding distance. You’re allowed to get closer than they say in the contract. It’s supposed to be three feet .. That is broken instantly” Sarah

This has been exposed in two major academic studies of the UK strip industry; countless testimonies from women who have left the industry; undercover journalists and even current lap dancers such as members of the East London Strippers Collective. It is revealed by police reports; press reports; comments from punters and even by strip club operators.

The largest research study ever conducted into the strip industry highlighted how half lap dancers reported frequent verbal harassment and unwanted touching from customers (in other words, sexual assault).

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

“I’m frequently asked how much I charge for sex – it seems to be taken as read that, as a lap dancer, I offer services outside the club”

Journalist reveals the constant verbal and physical harassment she was subjected to when undercover as a stripper: <https://londonist.com/london/features/this-is-what-it-s-like-being-a-lap-dancer-in-london>

Much of this has been collated here: <http://www.notbuyingit.org.uk/publications#Strip>

Given that research suggests that students are believed to make up 1/3 of lap dancers and Spearmint Rhino is in the middle of the University, the Council has a particular duty to pay heed to the harm associated with the industry. If it does not it is responsible for putting young female students, often teenagers, at risk: <https://www.tandfonline.com/doi/pdf/10.1080/01425692.2013.854596>

## Breach of the PSED: Fostering Poor Relations Between the Sexes

Lap dancing is the antithesis of 'fostering good relations between the sexes'. This too is a breach of the PSED.

The largest study of the industry ever conducted in the UK revealed that 1/3 of performers said the job had effected their view of men: Sanders, T., & Hardy, K. (2011) *The Regulatory Dance: Sexual Consumption in the Night Time Economy – Initial Findings*. Leeds: University of Leeds

"It's screwed up my view of men. Every time I see a man now, I just see him as a punter. There's only so many bad experiences you can have before you start hating them all . . ."

"You start to see men as nothing more than their wallets, idiots to be fleeced for as much as you can. You start to despise them for believing you when you flutter your eyelashes and tell them they're the most interesting customer that you've ever talked to."

"I always thought of the customers as vermin and, ironically, that is what they thought of me."

149. **ladivina69**  
8 Feb 2012 09:26

My daughter is a dancer and its not harmless fun. In order to bear dealing with this degrading and soul destroying work the girls drink too much and endure the worst aspects of male nature. She has become cynical, jaded and doesnt have relationships any more. She thinks that men are all untrustworthy and only after what they can get away with. Its not really a job to be proud of.

73 43

The intense competition between performers, nurtered by clubs which ensure far too high a ratio of lap dancers to customers, also does not foster good relations with other members of the female sex.

And of course, this is as nothing compared to the attitudes clubs foster by men towards women. Obviously the impact of this is far more concerning as men carry these attitudes around with them in a society where 10 million (1 in 3 women) experience male violence, in most part *because* of men's attitudes towards women.

In a study of customers of strip clubs it was found that over half of the men interviewed stated that their motivation for visiting lap dancing clubs was to escape from what they perceived as a code of conduct which 'restrained' them.

*Journal of Sex Research* 40:1, 61-75, 2004

"You can go in there and shop for a piece of meat , quote unquote , so to speak. I mean, you want to see a girl, you can see a girl run around naked. Have her come over, pay her to do a dance or two or three and walk away and not even ask her her name" Frank, K.

'Just trying to relax': Masculinity, masculinizing practices, and strip club regulars" *Journal of Sex Research* 40:1, 61-75, 2003

## Recent Incidences

This situation is so bad that a quick Google search of press reports exposes how close to a dozen clubs have been shut in the few years alone. The true level of incidence is obviously like to be considerably higher. This is collated here: [www.notbuyingit.org.uk/sites/default/files/Strip%20Sleaze%20Recent.pdf](http://www.notbuyingit.org.uk/sites/default/files/Strip%20Sleaze%20Recent.pdf)

**It includes Villa Mercedes, a branch of which was nearly licensed by Sheffield City Council**

### **Bing, West Bromwich 2017**

Shut down after a brawl led to GBH. Police also expressed grave concerns about prostitution, the use of possibly under age Romanian girls and the possibility that they may have been trafficked:

### **Hanley's, Staffordshire 2017**

Shut down after years of concerns over inappropriate touching, offers of prostitution, drugs and drink spiking.

### **Jack of Diamonds, Bristol 2017**

Closed for inappropriate touching.

### **Legs 11, Birmingham 2017**

License suspended for trafficking. Sexual contact observed and under cover trading officers offered 'sexual services' in VIP rooms.

### **Angels, Leicester 2016**

Fondling and touching viewed on CCTV. Several dancers undocumented and suspected of being underage.

### **Villa Mercedes, Harrogate 2015**

Shut down after repeated breach of licensing conditions including physical contact with dancers and 'audience participation'. (Appeal by operator to license refusal was withdrawn).

### **Bentley's, Doncaster 2017**

Performer assaulted outside after refusing sex with punter.

### **Diamonds Dolls, Glasgow 2017**

License suspended immediately when a half dressed, drunk and unconscious dancer was dragged out of the club by management and dumped onto the street (performer in question refused to speak to police, presumably out of fear of retaliation by management).

### **Cleopatra's Lounge, Huddersfield 2016**

Man smashes club window when dancer refuses to 'meet up' with him outside of the club:

<http://www.examiner.co.uk/news/west-yorkshire-news/man-smashed-lap-dance-club-11379793>

### **X in The City, Liverpool 2015**

Punter attacks lap dancer and steals her purse after she refused to give oral sex in a private booth. Punter: "I said 'are you going to suck my \*\*\*\* upstairs?' and she said 'yes'. Obviously that was the whole purpose."

### **Platinum's, Stoke 2017**

Loses its license: 'Exploitation' of punters, including violence and drink spiking.

### **Silks, Manchester 2017**

Several incidences of brawls and violent behavior

### **Charlie Brown's London 2014**

Breach of Frequency Exemption & Illegal Activity

### **Diamond Dolls & clubs across Scotland 2014**

Massive police sting

## Breach of the PSED – Private Booths

“There is only one reason why you have a cubicle. It’s because touching is going on and all sorts”  
manager of Club Crème, Bristol

<http://www.notbuyingit.org.uk/sites/default/files/PrivateBooths.pdf>

Sheffield City Council’s allowing of private booths is a case in point.

Legs 11, Birmingham, had its license suspended in 2017 with under cover officers being offered sexual services in private rooms.

“From a police perspective it would make life and enforcement easier if we did not have the VIP rooms”  
Police Officer

“If anything’s going to go wrong, it will be in the VIP or private rooms. You have to trust the integrity of the person who is in charge of security, but you can never be sure a blind eye is not going to be turned. Most venues have a VIP room, because it promotes intrigue to the customer who will go there and maybe look for something more, because of the secrecy” Police Officer

<http://www.notbuyingit.org.uk/sites/default/files/PrivateBooths.pdf>

Camden Council has had a policy against ‘private’ areas of any description in its clubs since SEV licensing was introduced. It has even gone to the High Court (successfully) to ensure this. This policy applies to Spearmint Rhino in Camden.

The reason for this is the high levels (and likelihood) of harassment, coercion and abuse in private booths. I would suggest allowing Spearmint Rhino private booths is in and of itself a breach of equality law as it is extremely likely to lead to ‘harassment and victimisation’.

Over 50% of dancers reported having received harassment ‘lots of times’ or a ‘a few times’, nearly half reported frequent verbal harassment and unwanted touching from customers. This was reported more widely in clubs with private dancing than those with only stage shows. Error! Bookmark not defined.

Private Booths: many dancers felt that the way in which private booths were set up also made them vulnerable and also allowed standards to be lowered by dancers offering more than is allowed in the dances.

<http://www.notbuyingit.org.uk/sites/default/files/PrivateBooths.pdf>

This paper that we submitted to Camden Council for its High Court proceedings outlines the high levels of harm associated with private areas in strip clubs and is quoted from throughout this submission:

<http://www.notbuyingit.org.uk/sites/default/files/PrivateBooths.pdf>

## Breach of the PSED – Simplistic Acceptance of Statements from Management

Again it is a breach of equality duty if the Council is not properly considering and analysing the information before them. This means evidence from management and even performers needs to be scrutinised with caution, rather than being simplistically taken at face value.

'It was clear to me ... that many owners and managers create a context in which the buying and selling of sexual services would be likely to happen. Club **owners** tend to absolve themselves of any responsibility if sexual services are found to be on offer, or being arranged on the premises, yet at the same time the dancers are encouraged to project an air of sexual availability to customers.'

<http://www.notbuyingit.org.uk/sites/default/files/PrivateBooths.pdf>

Our paper to Camden Council references how statements from management of 'excellent' operating conditions and performers well being simply cannot be taken at face value, for surely obvious reasons. Management have a clearly highly vested interest for abusive work conditions and prostitution, as this is how they will earn the most money. .

And if strip club operators are prepared to tell Parliament that 'lap dancing isn't sexual' then any statements they make surely have to be treated with extreme caution.

Besides, management and their legal team are adept at 'phrasing' information to ensure they are not lying but certainly misleading.

This includes constant statements by John Specht (Spearmint Rhino UK Vice President) in his witness statement to the Council for this licensing hearing that '**no complaints have been received**'. But this belies the fact that 100s of objections (*complaints*) actually have been received over years of licensing hearings. And yet this 'lack of complaint' is then re-iterated by Sheffield City Council's own licensing committee.

Management also, very deliberately, puts a 'Chinese wall' between it and any wrong doings at the club. An atmosphere is carefully cultivated that touching and full-blown sex acts are available yet when it happens management is able to claim no knowledge and instead fire the dancer as responsible.

The fact that a great many punters and members of the public view lap dancers as *de facto* prostitutes has been evidenced many times to the council (including by Not Buying It Sheffield at this licensing review).

### In Conclusion

'A number of factors contribute to the possibility of the dancers being pressurised into offering, or agreeing to, sexual services without direct instruction from management.'

'The clubs [are] run in a way that implicitly encourages the customers to expect and seek sexual services from the dancers.'

'It can be concluded, from the body of evidence that some lap dance club owners and managers create conditions in which prostitution is likely to occur.'

'So long as club managers assure the police and others that any dancer found to be offering or engaging in sexual services will be dismissed, places the onus for behaviour onto the dancer. There has been a tendency, as highlighted through tribunals and police evidence, that club owners who either encourage dancers to engage in sexual activity, or merely 'turn a blind eye' are not held responsible for allowing that to happen.'

<http://www.notbuyingit.org.uk/sites/default/files/PrivateBooths.pdf>

## Breach of the PSED – Simplistic Acceptance of Statements from Lap Dancers

Equally the Council needs to scrutinise statements from performers, rather than simplistically taking these at face value <http://www.notbuyingit.org.uk/sites/default/files/PrivateBooths.pdf> :

Several journalists have confirmed that the conduct of staff, dancers and customers is affected when they are aware they are being observed

'I found that no one except the management, who were excited by the idea of newspaper coverage, wanted to talk to me, and I was viewed with suspicion. Everything seemed controlled, and I had a sense that I was not seeing the true picture.'

Of course, no lap dancer can openly expose problems within clubs, including breach of the 'no touching rule' or sex acts, because if she does she is will then fired and black listed amongst other clubs. Or worse.

Of course, if a club operator 'asks' his performers to sign statements supporting 'perfect practices' within their club, they will do exactly that. As again referenced in our report on Private Booths, the women working in the clubs often operate under a culture of fear and intimidation <http://www.notbuyingit.org.uk/sites/default/files/PrivateBooths.pdf> :

This can be so extreme that performers who have been assaulted by club operators still will not talk, even to the police:

When a performer was dragged out on to the street by management, drunk, half naked and unconscious, she refused to talk to police even though this incident was so severe that the club's license was immediately suspended.

It can extend beyond performers to those researching the industry, as this journalist attested:

'for the record, one club owner telephoned me after our meeting and made what I took to be a veiled threat'<sup>Error! Bookmark not defined.</sup>

Women from the industry have told me in conversations that:

'If management tells you to do something, you do it'

This includes Sammy Woodhouse (former lap dancer who blew the lid on the Rotherham child sex abuse scandal, who I believe is also providing an evidenced-based objection to Sheffield City Council). I have also been told by her and others, including Stacey Clare, founder of The East London Strippers Collective that they:

'know of women being coerced by management into signing statements in support'

Stacey Clare is currently writing a book to, yet again, expose working conditions for lap dancer and this evidence was given to Camden City Council in a High Court case that upheld its decision to ban private areas in its clubs.

### Even Women who have *left* the industry *still* feel intimidated

"The shadowy world behind some clubs is not something that you would want to go up against"

"I'd rather not say what I am doing these days, for the same reason that I won't tell you my real name. These are people [the club owners] you don't want to mess with. I am genuinely afraid of them. Who knows exactly what goes on behind the scenes, but I'd still rather not mess with it."

<http://www.notbuyingit.org.uk/sites/default/files/PrivateBooths.pdf>

### 'A New Reality'

"Often if a person has asked about my experience as a dancer I have responded with a socially desirable answer, and simply asserted that I enjoyed dancing, that I made a lot of money but in the end dancing was not for me. This explanation has in no way conveyed the extremity of emotion and mental distress I have experienced as a dancer and in no way conveys the sexual degradation and humiliation I have experienced and observed during my short dancing career" Liz former lap dancer

[http://notbuyingit.org.uk/sites/default/files/LAP%20DANCING%20testimony\\_Liz.pdf](http://notbuyingit.org.uk/sites/default/files/LAP%20DANCING%20testimony_Liz.pdf)

Of equal significance, is the fact is that a 'new reality' very quickly sets in when you start working in stripping. As numerous women state once they have left the industry. This includes lying to yourself that 'all is well' as a coping mechanism and because your entire sense of self-worth is wrapped up in the industry – so to admit that anything might be wrong with it becomes unthinkable. And it includes genuinely not even recognising that being constantly harassed and groped or even paid for sexual acts is untoward or is not normal. A 'new reality' sets in, as researcher shows:

'These women, as you would expect, are keen to defend the work they do and furious that what they regard as patronising feminists seem bent on turning them into sex workers.'

".. for a time, it is possible to convince yourself that everything is OK. "No one in the club would express any uncertainty about what they are doing - they're too busy competing for work - so even if you do feel bad about it, you wonder if you are the only one. You convince yourself that your perception of what the job would be like is the same as what the job is, even though there is a quite weird gap between the two. It's only when you have made the decision to leave that you realise how insane it all was."

<http://www.notbuyingit.org.uk/sites/default/files/PrivateBooths.pdf>

## Breach of the PSED – in the Vicinity of Clubs

Members heard how some women felt threatened and unsafe walking past the premises during the day knowing that the premises was there and that it triggered memories of past events for them. The premises will now essentially be 'invisible' during the day which will aim to mitigate this.

The Council has heard countless examples of how women and others feel unsafe in the vicinity of the club in objections made to licensing renewals. The club operator has even taken pictures outside of the club showing little traffic during its operating hours. This, of course, was used to suggest 'no one uses the street'. However it could equally mean that the club has in effect created a 'no go zone'.

The Council's solution? Stop exterior signage outside the club. But Sheffield is a small city and local people know full well that the club is there even during the day when not open. If anything, a black unsigned building seems even more sinister.

And this does *not* address the club during its opening hours. The council has also heard countless evidence from objectors over years that they avoid the area during the night. Students (many of whom are teenagers, some as young as 17), of course, have *no choice* but to use the area given the club is next to halls of residence.

Whether or not the venue is open during the day or 'blacked out' is irrelevant when considering the PSED. It has been confirmed numerous times that the very presence of a strip club can amount to a breach of equality law by making women feel vulnerable, unsafe and causing them not to use the street or nearby facilities.

And strip clubs undoubtedly do make women feel threatened and uncomfortable (ie harassed and victimised) in their vicinity as highlighted by the Royal Town Planning Institute:

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

This is elaborated upon as:

**' . . . 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.'**



A considerable number of witness statements provided to Sheffield City Council at Spearmint Rhino licensing hearings and at policy review clearly demonstrate this strip club's presence shows that the free movement of women and others with protected characteristics is being prevented by the club:

- Women running LGBT groups
- Disabled Women
- Those running support centres for **marginalised** young people
- Those accessing services for vulnerable women
- Women using work space

This feeling of intimidation and avoidance measures women take, goes far beyond when a club is operating at night. As highlighted in the journal *Criminal Justice Matters*:

".. women also reported **avoiding** certain streets and **feeling frightened** in the **day time**, when the clubs are closed. It is the **existence** of the clubs that **causes women to feel alienated in public space at all times**, and fearful of the threat of violence posed by the sexual **objectification** of women."

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

The Institute goes on to explain that if women *feel* threatened and uncomfortable by the presence of a strip club then **their very presence amounts to a form of discrimination**, as it prevents full access and freedom of movement by women in the borough:

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

<sup>1</sup> Royal Town Planning Institute 'Gender and Spatial Planning Good Practice' Note, 2010, p. 87

Local Authorities have a **legal duty** to prevent all of this. By not doing so they can be challenged in court. Thus if the PSED is given due consideration it becomes increasingly hard for Local Authorities to justify the presence of any Sexual Entertainment Venues and to consider anything other than a 'zero policy' on SEVs.

## **It is NOT Pro Equality to license clubs to stop them 'Going Underground'**

The Council appears to be under the illusion that they *are* upholding their equality duties by granting strip club licenses because by not licensing clubs the industry will 'go underground'. A circular argument surely as by that logic the Council has to license everything and anything in order to stop it 'going underground'.

On top of this there is absolutely no evidence that *not* granting licenses drives the industry 'underground'.

I have contacted several Councils with a 'zero policy' and no clubs. Not one has found any evidence of 'underground activity'.

In fact, Sheffield City Council appears to be basing its 'going underground' argument from a research paper by a lap dance enthusiast (R Colosi) in which she cites a book about New York:

<https://www.publishersweekly.com/978-0-446-52571-8>

It should be pointed out that this book is not academic research – it is a book about New York, written by a man who has also co-authored books with Erin Brokovitch and Barry White! Besides many of the clubs dubbed 'illegal' might not be 'illegal' (as in unlicensed), but rather operating in breach of that license.

Besides it is surely disingenuous to compare a small city like Sheffield with a heaving metropolis like New York.

And where illegal clubs set up they can always be found and shut down. If punters can find them, so can the authorities, as has happened across the USA:

Atlanta: Man busted for running illegal strip club in his home:

<https://www.wsbtv.com/news/local/dekalb-county/man-60-accused-of-running-illegal-strip-club-in-home/473973225>

<https://www.11alive.com/article/news/crime/illegal-strip-club-busted-next-to-daycare-church-in-dekalb/85-362385752>

San Jose: Illegal clubs being shut after press reports:

<http://sanfrancisco.cbslocal.com/2015/12/08/san-jose-police-illegal-strip-clubs-crackdown/>

Phoenix, 'stripper cage fighting', openly advertised on Facebook, shut by authorities:

<https://www.youtube.com/watch?v=3DuR1EwaXJI>

But most importantly, the core premise that not licensing the industry will drive it underground is, I would suggest, on its head: **It is actually the legitimising of the sex trade that drives a substantial underground sector – as has been found in every country that has legalised or decriminalised prostitution.**

### **It is NOT Pro Equality to License Strip Clubs to 'Keep Women Out of Poverty'**

Another argument that is often made to justify licensing the strip industry is that if it is not licensed lap dancers 'will be put out of work and into poverty'. Again this is a circular argument of the sort used to justify sweat shops.

This analogy is particularly apt given that it is the strip industry which actually tends to *put women into poverty* and lead them into future *unemployment* – not just because of its poor pay and work conditions but because it can be hard for women when they do leave to then find employment (because of low self esteem, stigma or lack of qualifications).

If the Council is really so concerned by keeping women out of poverty, why hasn't it enforced proper pay and employment conditions on Spearmint Rhino (as given in the recommendations), as many other councils have done?

And instead of licensing strip clubs, why doesn't it offer exit plans for lap dancers – supporting them into other work with proper employment – with respectful pay and working conditions and minimal risk of sexual exploitation (as also outlined in the recommendations)?

I would also point out that most lap dancers are 'itinerant' – working in many different clubs across the country. This was also acknowledged by Philip Kolvin, QC, at the last Spearmint Rhino licensing hearing. If one club closes, women are not 'put out of work' they merely move to another club.

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**Bower Claire**

**From:** [REDACTED]  
**Sent:** 15 May 2018 18:59  
**To:** licensingservice  
**Subject:** Objection to Spearmint Rhino license renewal

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** SPEARMINT RHINO

14/5/18

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****(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) 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.”

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.

Finally, I would like to conclude that as a young woman, just recently turned 18, the implications of such a venue terrify and anger me. If the council was to permit this license application, what message would the council be sending to myself and all the other young adults of our city? This is our hometown; a place where we have the right to feel respected, safe and able to blossom to become good people. The fear is that the Spearmint Rhino will teach and enforce qualities that impede such a place of growth and amity. To agree to such a venue is to agree to the destruction of our vibrant, family community we have built in Sheffield, a place where everybody is welcomed and loved. I hope you consider the matter very carefully and that the council asks themselves what future they foresee for Sheffield.

I look forward to hearing from you.

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



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**Bower Claire**

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** 15 May 2018 19:23  
**To:** licensingservice  
**Cc:** [REDACTED]  
**Subject:** Objection to granting a license to Spearmint Rhino  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged  
**Categories:** SPEARMINT RHINO

**Dear Sir /Madam**

**On behalf of the Know the Line Campaign Sheffield, I wish to object most strongly to the decision to re license the strip club Spearmint Rhino. I am also dismayed by the Council's decision to allow unlimited numbers of SEVs in the city. This is clearly sending out a message to women and girls that their safety and dignity are not considered to be important.**

**Safer Streets Sheffield and the Know the Line Campaign comes out of the experiences of sexual harassment of women and girls in Sheffield. We are a collaboration of local groups and individuals who have come together to create a public awareness campaign about sexual harassment of women and girls in Sheffield and South Yorkshire.**

**We are all volunteers who feel strongly that women should feel safe to get on with their lives without fear of harassment or worse. We are making this submission as we believe that venues such as Spearmint Rhino contribute to the sexual harassment of women and girls.**

**Our campaign is supported by a number of local MPs, the Police and SCC as well as a wide range of front line services which help women who have been affected by violence and sexual harassment.**

**The council have a legal Public Equality Sector Duty to ensure that their actions foster good relations between genders. There is no way that a strip club can be said to do this. Women in and around this venue are sexualised and objectified in an unequal relationship and this clearly does not foster good relations between the genders. Many women feel unsafe walking around this area because of the attitudes of the men, towards women, who attend the venue.**

**Spearmint Rhino is right next to Hallam University Student Union. The existence of the club is telling them that it is OK to sexualise and objectify women and to treat them as commodities to buy and sell. Hallam University's plans for their city campus will mean that they will be forced to become the only University in the country with its own on-campus strip club. This does not help to make it a positive choice for many young women when considering which university to attend.**

**The area of town which the club is situated is part of Sheffield's cultural industries quarter, is a strip club really part of our city's culture?**

**It is time to do the right thing and refuse to re license Spearmint Rhino.**

**[REDACTED]**, on behalf of  
Know the Line Campaign Sheffield

**Bower Claire**

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**From:** [Redacted]  
**Sent:** 15 May 2018 19:25  
**To:** licensingservice  
**Subject:** Spearmint Rhino 2018 OBJECTION

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** SPEARMINT RHINO

15/5/18

Dear Licensing

**Objection to Spearmint Rhino licence renewal**

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I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council’s 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) 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.”

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.

**NAME and ADDRESS which will be redacted**

[REDACTED]  
[REDACTED]  
[REDACTED]

135

**Bower Claire**

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**From:** [REDACTED]  
**Sent:** 15 May 2018 19:26  
**To:** licensingservice  
**Subject:** Objection to license renewal of Spearmint Rhino  
**Attachments:** SpearmintRhinoObjection 20180515.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** SPEARMINT RHINO

Please see attached my objection to the renewal of Spearmint Rhino's license. I am particularly appalled by the negative impact on the perception of women such establishments contribute. I am particularly conscious where this objectification of women in the so called softer side of the sex industry leads through my contact with women who have been trafficked and the experiences of women I know. Sheffield City Council in licensing this establishment has surely lost its way as a council which should protect the rights of all its citizens. At this particularly moment in time, with the Me too movement, Sheffield City Council will be standing on the wrong side of history if this license is renewed.

Kind regards  
[REDACTED]

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

15 May 2018

Dear Licensing Services

### **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<sup>i</sup> 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"<sup>ii</sup> 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.

Sheffield Hallam's Student Union, The Hubs, is frequented by young women, some of whom are vulnerable as a result of being away from home for the first time, and / or vulnerable after an evening out. Unfortunately, my experience of walking past Spearmint Rhino is that the people who frequent this establishment do not respect women, which is apparent by their behaviour.

###### **(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.”<sup>iii</sup>

### **(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**

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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:

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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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Kolvin continues with:

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

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

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

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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 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<sup>x</sup>.

In their UK study published in 2011 Sanders and Hardy<sup>xi</sup> 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.”<sup>xii</sup>

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, the number of lap dancing clubs has fallen by a third in England<sup>xiv</sup>. 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 look forward to hearing from you.

## **References**

<sup>i</sup> 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>

<sup>ii</sup> 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/>

<sup>iii</sup> Sheffield Hallam University 22<sup>nd</sup> 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>

<sup>iv</sup> 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*

<sup>v</sup> *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>

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

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

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

<sup>ix</sup> 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>.

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



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

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

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

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



**Bower Claire**

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** 15 May 2018 20:52  
**To:** licensingservice  
**Subject:** Objection to Spearmint Rhino licence renewal

**Importance:** High

**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](mailto:licensingservice@sheffield.gov.uk)

15<sup>th</sup> May 2018

Dear Licensing

**Objection to Spearmint Rhino licence renewal**

**I am a lecturer at Sheffield Hallam University and am deeply concerned by the impact this sex establishment has on the environment for students and young people living and studying in the area. I am concerned about their safety and well being and the message such an establishment sends to them and their families.**

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<sup>[i]</sup> 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"<sup>[ii]</sup> 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.

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**ii) Use of other premises in the vicinity**

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There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC 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.

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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.

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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.

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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 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<sup>[x]</sup>.

In their UK study published in 2011 Sanders and Hardy<sup>[xi]</sup> 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.”<sup>[xii]</sup>

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.”<sup>[xiii]</sup>*

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

According to the BBC, the number of lap dancing clubs has fallen by a third in England<sup>[xiv]</sup>. 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 look forward to hearing from you.

## References

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<sup>[i]</sup> 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>

<sup>[ii]</sup> 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/>

<sup>[iii]</sup> Sheffield Hallam University 22<sup>nd</sup> 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>

<sup>[iv]</sup> 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*

<sup>[v]</sup> *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>

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

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

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

<sup>[ix]</sup> 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>.

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

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[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 22<sup>nd</sup> 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] 23<sup>rd</sup> February 2018 Available from: <http://www.bbc.co.uk/news/uk-england-43043842>



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**Bower Claire**

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**From:** | [redacted] <[redacted]>  
**Sent:** 15 May 2018 22:18  
**To:** licensingservice  
**Subject:** Objection to Spearmint Rhino licence renewal  
**Attachments:** SpearmintRhinoObjection2018 .docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** SPEARMINT RHINO

--  
Thanks,  
[redacted]

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

15/05/2018

Dear Licensing

**Objection to Spearmint Rhino licence renewal**

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

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's 2018 Sex Establishment Policy and in accordance with the council's equality duties because it is completely inappropriate to have a strip club in that location, in such a central position within our city, close to so many educational and residential buildings and so many other things that should never have a strip club in their midst. This is both because of the direct damage that it causes having a strip club there and also because of the wider impact and message that it sends, having such a club, which is fundamentally based on outdated, stereotypical and harmful views of women, and assumptions that men are entitled to buy power over women's bodies.

I'm 16 years old, born and bred in Sheffield, and I'm amazed that in this day and age that something as old-fashioned and obviously discriminatory still exists, and has been actually approved each year by the council. In school I have learnt about the fundamental principle of respect- it is so vital for our society and the fact that this strip club still exists and promotes such derogatory and damaging views just utterly undermines the general message that we all are deserving of equal respect and rights.

I have several close friends in the LGBT+ community and it is because of places like Spearmint Rhino that I worry for their wellbeing- my friends do not conform to the archaic stereotypes which strip clubs promote, and could be subject to abuse by people who are influenced by the messages these places promote.

I'm currently thinking about my choices of where to go for University, and I would *never* choose a university which has a strip club in the middle of several of the main university buildings and literally next door to the student union.

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**Bower Claire**

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**From:** [REDACTED]  
**Sent:** 15 May 2018 22:41  
**To:** licensingservice  
**Subject:** Spearmint Rhino Objection  
**Attachments:** Spearmint Rhino Objection 2018.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** SPEARMINT RHINO

Please find attached a letter of objection for the Spearmint Rhino renewal.

Yours

[REDACTED]

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

14<sup>th</sup> 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<sup>i</sup> 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"<sup>ii</sup> 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.”<sup>iii</sup>

**(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.”<sup>iv</sup>

This establishment being so close to a number of university buildings only strengthens the normalisation of sex establishments being an opportunity for young women/girls to enter into. This is a terrible message for Sheffield Council to give to its young people who come to the city to develop positively as citizens.

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.<sup>v</sup>

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

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

Kolvin continues with:

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

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

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

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.<sup>ix</sup>

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<sup>x</sup>.

In their UK study published in 2011 Sanders and Hardy<sup>xi</sup> 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."<sup>xii</sup>

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."*<sup>xiii</sup>

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

According to the BBC, the number of lap dancing clubs has fallen by a third in England<sup>xiv</sup>. 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 myself have visited Sheffield on a number of occasions and have indeed felt uneasy, uncomfortable and violated. As a woman, to walk past Spearmint Rhino is extremely degrading and I am given a fundamental message that my worth is only built on my sexual availability.

Swansea Council, the local authority area where I live, has a **Licensing of Sex Establishment Policy**, and has set a **NIL** count for sex establishments within the city centre area, which is a large scale area including the shopping centre and a large surrounding residential area. I believe this is the only way to secure a safe, prosperous and equal place to live.

I look forward to hearing from you.



## **References**

- <sup>i</sup> 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>
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- <sup>iii</sup> Sheffield Hallam University 22<sup>nd</sup> 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>
- <sup>iv</sup> 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*
- <sup>v</sup> *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>
- <sup>vi</sup> Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87
- <sup>vii</sup> Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87
- <sup>viii</sup> Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in *Criminal Justice Matters*, 88:1, 10-12.
- <sup>ix</sup> 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>.
- <sup>x</sup> Slideshare available from: <https://www.slideshare.net/ZerooptionSheffield/villa-mercedes-hearing-8th-september-2016>
- <sup>xi</sup> Sanders, T., & Hardy, K. (2011) *The Regulatory Dance: Sexual Consumption in the Night Time Economy – Initial Findings*. Leeds: University of Leeds
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- <sup>xiii</sup> Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.90
- <sup>xiv</sup> 23<sup>rd</sup> February 2018 Available from: <http://www.bbc.co.uk/news/uk-england-43043842>



**Bower Claire**

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**From:** [Redacted]  
**Sent:** 15 May 2018 22:49  
**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  
[licensing@sheffield.gov.uk](mailto:licensing@sheffield.gov.uk)

15th of May, 2018

Dear Licensing Service,

**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, S12BS.

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.

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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:

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There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC 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.

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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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### **Further grounds for refusal**

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

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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.

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

Kolvin continues with:

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

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 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 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. 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:

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

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According to the BBC, the number of lap dancing clubs has 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." |

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 look forward to hearing from you

Yours faithfully  
[Signature]  
[Name]  
[Title]  
[Address]



140

**Bower Claire**

---

**From:** [REDACTED]  
**Sent:** 15 May 2018 23:10  
**To:** licensingservice  
**Subject:** Objection to 'Spearmint Rhino' Sexual Entertainment Licence application

To: Licensing Service -Sheffield City Council

I should like to register my strong objection to the application by Sonfield Developments for renewal of their Sexual Entertainment Venue Licence for Spearmint Rhino in Brown Street, Sheffield. Such a club is both damaging to the women it employs and corrupting to its male customers. The club in question, at a location in the heart of the city's cultural quarter and in a university area, is bad for the city's image, harmful to the good-quality development potential of central Sheffield, liable to prompt anti-social behaviour of various kinds, deeply unpleasant and uncomfortable for women wishing to use the neighbourhood's more civilised facilities, and contrary to the City's own well-publicised and well-considered policies on gender rights and equality.

I request that you give serious consideration to these objections.

Yours,  
\_\_\_\_\_  
[REDACTED]



**Bower Claire**

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**From:** [redacted]  
**Sent:** 15 May 2018 23:22  
**To:** licensingservice  
**Subject:** Objection to Spearmint Rhino licence renewal

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, S12BS.

I strongly object to the renewal, for all of the reasons so clearly described in the form letter below. This is an regressive, dehumanising & deeply sexist institution that has been tolerated by the council for far too long. It's presence is an incitement to to sexual harassment & abuse of all girls & women

I believe that the Council should recuse 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 (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) 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."

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 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 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.

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:

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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.”*

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. 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 look forward to hearing from you.

142

**Bower Claire**

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**From:** [REDACTED]  
**Sent:** 15 May 2018 23:25  
**To:** licensingservice  
**Subject:** Objection to Spearmint Rhino licence renewal

Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD  
[licensingservice@sheffield.gov.uk](mailto:licensingservice@sheffield.gov.uk)

15th of May, 2018

Dear Licensing Service,

### **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, S12BS.

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.

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

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

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I look forward to hearing from you.



143

**Bower Claire**

---

**From:** [REDACTED]  
**Sent:** 15 May 2018 23:25  
**To:** licensingservice  
**Subject:** Objection to Spearmint Rhino licence renewal

Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD  
[licensingservice@sheffield.gov.uk](mailto:licensingservice@sheffield.gov.uk)

15th of May, 2018

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

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**(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.”

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 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 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. 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, the number of lap dancing clubs has 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 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 look forward to hearing from you

[Redacted signature block]

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## Bower Claire

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**From:** [REDACTED]  
**Sent:** 15 May 2018 23:45  
**To:** licensingservice  
**Subject:** Fwd: Objection to Spearmint Rhino licence renewal

Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD  
[licensing@sheffield.gov.uk](mailto:licensing@sheffield.gov.uk)

15th of May, 2018

Dear Licensing Service,

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, S12BS.

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 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."

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.”

(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

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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.

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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".

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 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 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. 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.

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“Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.” 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. 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 look forward to hearing from you

Kind Regards.

[Faint signature]

[Faint signature]

[Faint signature]

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**Bower Claire**

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**From:** [REDACTED] <[REDACTED]@googlemail.com>  
**Sent:** 15 May 2018 23:46  
**To:** licensingservice  
**Subject:** Objection to Spearmint Rhino Licence Renewal - Email 1 of 2  
**Attachments:** SR Objection May 2018.docx; Walkit Cholera Monument to The Light Cinema.pdf; Walkit Sheffield College to Town Hall.pdf; Walkit Sheffield Interchange to Decathlon 199 Eyre Street.pdf; Walkit Unite Students Leadmill Point to Town Hall.pdf

Dear Licensing

Please see my attached letter objecting to the application for renewal of Spearmint Rhino's SEV licence, plus attachments:

4 x maps of walking routes from [walkit.com](http://walkit.com)

Area Action Plan for the Cultural Industries Quarter - **PLEASE NOTE THIS WILL FOLLOW IN A SEPARATE EMAIL**

Please can you acknowledge receipt.

I look forward to hearing from you.

Kind regards

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

14 May 2018

Dear Licensing

### **Objection to Spearmint Rhino licence renewal**

I wish to object to the application for a sex establishment licence by Spearmint Rhino at 60 Brown Street, Sheffield, S1 2BS.

I believe that the Council should refuse the licence application because the locality and exact position in which the club is situated, and the uses of other premises in the area, have changed dramatically in recent years and it is now completely inappropriate to have a strip club there, specifically one which includes private rooms away from the main public area. I believe that to continue to license it in that location would cause unacceptable and unnecessary harm to the reputation and interests of the city and people of Sheffield as a whole, the Council as the licensing authority, the Cultural Industries Quarter, local residents, businesses/services and the individuals who go there.

I believe renewing the licence would also cause unacceptable and unnecessary harm to women and the public in Sheffield and more widely because of the directly discriminatory images and messages that the club actively promotes about women, about their bodies and appearance, about their sexual availability and about the entitlement of men to have power over women by payment of money, which is diametrically opposed to the Council's legal obligations to actively work to eliminate discrimination, harassment and victimisation, foster good relations between the sexes and people of different sexual orientations and advance equality of opportunity of women and others including by removing or minimising disadvantages they suffer.

#### Location and equality

I refer to the comments of others about the location of 60 Brown Street, and about the premises and wider uses and activities of people in the immediate vicinity, the surrounding area and Sheffield more widely.

In particular I refer to the comments of Sheffield Hallam University, as the way that SHU and the area around 60 Brown Street has developed means that Spearmint Rhino is now bang in the middle of the SHU city campus, including being literally next door to the students union but in fact even closer physically to the Cantor building which is one of the main SHU buildings housing over 240 staff and providing teaching space for more than 1600 students including the faculties of Arts, Computing, Engineering and Sciences.

I have used the Cantor building and other SHU buildings surrounding 60 Brown Street in my role as a trustee and Chair of Disability Sheffield, which is a membership and user-led organisation, run and controlled by disabled people, that promotes independence, equality and other human rights for disabled people. We have regular board meetings and SHU kindly gives us free room space for this. Most of the trustees have a disability, including learning disabilities, physical disabilities and other long-term conditions. As well as my voluntary role with Disability Sheffield my work centres on disability rights and throughout my career I have worked with disabled people and supported them to fight against discrimination and systemic disadvantages.

I am passionate about advancing equality and improving the lives of all people with protected characteristics, not just disabled people, and I am fully aware of how strong the duties are on public bodies such as the



Council to exercise all their functions in a way that works to proactively eliminate discrimination, harassment and victimisation, foster good relations between people with different protected characteristics and advance equality of opportunity. As such I find it astonishing that the Council has continued to grant a licence to a strip club in such an incredibly central and prominent location, which is unquestionably retrograde in equality terms, promoting stereotypical images of women as objects and reinforcing rather than challenging assumptions of women's sexual availability and men's power over them.

If the Council had to consider granting a licence for business located in such a central part of Sheffield whose prime purpose was to present as entertainment a spectacle based on stereotyped views of disabled people, where non-disabled people were able to pay for the right to get the disabled people to behave in a certain way that conforms further to outdated and damaging assumptions – for example a display of people with dwarfism that presents them as toys – the Council would not dream of granting it. (Incredibly, however, there are strip clubs in other parts of the world that do operate just such a form of entertainment:

<http://ottawacitizen.com/news/local-news/ottawa-strip-club-defends-dwarf-toss-after-event-raises-ire-of-critics-councillor>; <https://www.freep.com/story/news/local/michigan/wayne/2016/01/29/dwarf-tossing-topless-bar-little-people-of-america-dearborn/79539972/>.) This may seem like an extreme comparison but in equality terms it is no different than allowing such promotion of stereotypical, outdated and damaging images of women.

When attending Disability Sheffield meetings or going to the area of 60 Brown Street for other reasons such as with my children I am extremely aware of the imposing presence of the club and what it represents, and I feel it is an affront to the principles of equality that I and others fight so hard for that the Council has continued to actively support its presence each year given what it represents and what it does. The current context is very hard for disabled people, after years of cuts and austerity that have fallen disproportionately on them, and it feels like things are going backwards for disabled people in equality terms. As such I would prefer to have our meetings somewhere else where we do not have this striking reminder of the inequality that is still so rife for disabled people, women and other people with protected characteristics. But our resources are limited and so we need to make the most of SHU's generosity in hosting us.

#### Location including wider context

When considering the appropriateness or otherwise of the location, it is vital for the Council to understand why it is inappropriate not just in terms of the impact on individual local businesses or uses in close proximity to the building but in terms of how it fits into a wider picture, including the location:-

- within the Cultural Industries Quarter (CIQ)
- in the middle of a specific sub-area of the CIQ that has been dubbed the 'Heart of the CIQ'
- relative to adjacent areas of the city, including being immediately between the main railway station (230 metres to the east of 60 Brown Street) and the Heart of the City area (180 metres to the west) (distances are measured on Google maps)
- on key pedestrian, cycle and other through routes between different areas of the city, for example:-
  - between the main residential area of the CIQ (the so-called 'City Living Hub', which is just 70 metres east from 60 Brown Street) and the Heart of the City area: see for example **appended** route on walkit.com between the Unite Students residential block at 26 Leadmill Road and Sheffield Town Hall;
  - between the east and west of the city, including the Moor : see for example **appended** route on walkit.com between the Cholera Monument (to the east of the railway station, next to the Norfolk Park area) and The Light, the new cinema complex on the Moor;
  - between Sheffield's main bus station (325 metres to the north-east) and the Moorfoot/Bramall Lane/London Road area and Sheffield's new £65m Chinatown

development: see for example **appended** route on walkit.com between the bus station and Decathlon (199 Eyre Street), one of the large retail units between Moorfoot and Bramall Lane;

- between the south-east of the city and the centre: see for example **appended** route on walkit.com between the Sheffield College Granville Road site (640 metres to the south-east of the club, which has a nursery that is open to all parents who live, work or study in the wider community, not just students at the College) and Sheffield Town Hall
- See also the attached Area Action Plan for the CIQ from 2013 including the maps on pages 7, 13, 15, 16, 18, 23 and 60 which shows how absolutely central and critically important the location of 60 Brown Street is in terms of:-
  - Streets and buildings with character, including listed buildings
  - Educational and cultural activities
  - The only signed cycle path in the CIQ
  - Pedestrian movements
  - Bus routes and bus stops serving **more than 15 lines** – the most in the whole area
  - Landmarks – it is literally in the middle of the cluster of four major outside landmarks in the Heart of the CIQ between the railway station and the centre of Sheffield
  - Nodes – i.e. ‘places where paths, activities or events are concentrated’ and that are ‘visually very important in providing an entrance to the area’
  - Corridor views and important pedestrian viewpoints
  - Position in the middle of ‘visually positive architectures’
  - Being next to the only open space in the whole CIQ
  - Key Project Sites

In all these respects, the location of the club is inappropriate and damaging, because of the actual impacts on local residents and other people and businesses nearby or passing through, including people experiencing harassment in that area or avoiding the immediate area because of concerns about increased crime or antisocial/abusive behaviour from people associated with the club or because of the tawdriness of the vicinity that the club’s presence perpetuates, and businesses avoiding that area because they do not want to be tainted or otherwise adversely affected by being near a strip club (for example the premises next door, 62 Brown Street, are, unsurprisingly, vacant), but also because of what it represents. This is a profound effect which is not mitigated by the fact that the club is closed and the signage blacked out in the daytime; it is caused by the club being there, being approved by the Council, and standing as a living monument to outdated views of and behaviour towards women, where all notions of equality and improvement of the lives of women can be left at the door.

This wider impact and awareness of such clubs and what they represent, regardless of signage or specific advertising, is highlighted by research in Leeds commissioned by a strip club in order to support its application for a licence. This research is summarised in the published case of Bean Leisure and Ruby May v Leeds CC [2014] EWHC 878 (Admin) in which the High Court upheld the decisions of Leeds City Council refusing to renew the SEV licence for two strip clubs (including the one that had commissioned the research) despite them having been licensed for a number of years previously. The research was based on 100 interviews with respondents who were 21 or over and either lived in the city centre or visited it at least once every two months. It found that 76% of respondents were aware of the presence of lapdancing clubs and many could name one or more of the clubs, including around a third of all respondents who could name the club that had commissioned the research despite the fact that the club had no signage, just plain windows with a dark curtain blocking the view into the premises. The judge held that:

‘Not least because of the gender split of the respondents (46 men/54 women) it is overwhelmingly unlikely that the 76% of all respondents who were aware of the presence of lap dancing venues were all or even preponderantly users or potential users of the clubs.’

He also commented that it was 'debateable' whether the club's presentation and lack of signage,

'which is itself a contrast to the buildings around it, most or all of which provide some indication of what they are... really anonymises the premises or does the opposite by suggesting the true nature of their use'.

I believe that the same is true of Spearmint Rhino at 60 Brown Street, and that the nature of the club and what it represents is extremely well known to people across Sheffield and very evident not just to people that use the immediate vicinity but more widely including to those who might be considering walking through or using facilities in that area, or setting up home or business in the immediate vicinity (for example in the vacant premises next door), or elsewhere in the Cultural Industries Quarter (for example in the almost entirely residential City Living Hub sub-quarter of the CIQ running from Leadmill Point (70metres from the club) to The Trigon where Shoreham Street meets the inner ring road), or elsewhere in Sheffield, but may think twice as a result of the prominent presence of a strip club in such a central location.

Some of these impacts can be clearly identified: for example my friend's 15-year-old daughter walks from her home in the Norfolk Park area east of the city centre to King Edward's School, south-west of the centre; her shortest route would go past 60 Brown Street, however she is not comfortable taking this route and diverts a longer way to the north via the railway station and Howard Street. Other impacts are less measurable, but they include the full range such as being a potential factor in decisions such as that of Channel 4 as to whether to move to Sheffield.

#### Impact on Festival/CIQ Square and pedestrian route from CIQ eastwards beyond the railway station

A specific illustration of how the locality has been adversely impacted by the inappropriate presence of a strip club at 60 Brown Street is the fate of the so-called CIQ Square (formerly Festival Square) which lies between 60 Brown Street and the SHU Students Union Building.

In the detailed Area Action Plan for the CIQ that was published in 2013 (see attached), this is identified as the only area of open space in the whole CIQ with huge potential to develop as a green space and focal point for development of the whole area. However it is also identified (page 48) that the open space has no landscaping, planting etc and 'does not seem to be achieving its full potential', moreover it is identified (page 23) as part of a **weak pedestrian route** connecting the Heart of the CIQ via Grinders Hill to the neighbouring City Living area of the CIQ, then to the Cultural Commercial Hub immediately south of the railway station, and beyond that to the east side of the station via the pedestrian bridge.

It is specifically identified (page 35) that the poor pedestrian flow and footfall through such parts of the CIQ is 'due to a lack of attraction with poor active frontages, vacancy and dereliction'.

The Area Action Plan sets as top priorities to be achieved **within the next 1-5 years** (i.e. by 2018) the need to 'revitalise and re-landscape this open space [next to 60 Brown Street], whilst also creating a connection between it and Grinders Hill pedestrian route', which 'will involve improving the quality of the public realm along this route, developing a connection with this route and the pedestrian route which is part of the City Living area's Key Project Site, and improving the lighting of the enclosed Grinders Hill section'.

The Area Action Plan also sets out in detail how temporary uses in outside areas such as that next to 60 Brown Street can be a vital way of 'attracting investment, people and activity into otherwise forgotten spaces'.

The Plan sets out a vision for CIQ Square being developed along the lines of Leopold Square or Devonshire Green. The vision is of a vibrant mixed use with development of green space, outside seating and special events to draw people and business in.

I agree wholeheartedly with this vision and it resonates particularly with me because I play in a gypsy jazz band and we are active in supporting the development of live music at different venues in Sheffield including

new and up and coming venues as well as more established venues both indoor and outdoor such as at Leopold Square. The other musicians in the band are extremely experienced having played for many years with people like Van Morrison, John Martyn and Peter Green. CIQ Square stands out as a potentially perfect location for the development of outside events, including gigs, that link in with the activities of the surrounding buildings such as the Showroom, the Site Gallery and SHU. I would love to see it develop in that way, as in the vision set out in the Area Action Plan 5 years ago.

Yet it is patently obvious that that vision and the specific plans that were to take place in the last 5 years have not happened. The open space next to 60 Brown Street is still deserted and devoid of activity or attractive landscaping. The pedestrian route is still weak and people avoid it. The extraordinary development in other parts of the CIQ in the last 5 years has completely bypassed this immediate area. It is patently obvious that the key factor in this has been the presence of a strip club, with a total lack of positive contribution to the frontage of the street, to the connection between inside and outside activity, and which puts people off renting the premises next door or using the outside space.

#### Inappropriate proximity to premises/areas with sensitive uses

There are many examples that others will no doubt give as to how Sheffield's CIQ and the area round 60 Brown Street has developed, and the dramatic increase in the number of nearby premises with sensitive uses, so that it is now completely inappropriate as a location for a strip club. Below are a few examples of nearby premises with sensitive uses that concern me and would undoubtedly be regarded by the vast majority of the public as activities/uses that a strip club should never be sited near, but I am in no way attempting to be comprehensive:-

- The club is less than 100 metres away from a business called The Great Escape which runs children's parties with themes like pirates and mad scientists for children at least as young as 7 and which my youngest child has attended - <https://thegreatescapesgame.co.uk/>
- Sheffield College has a number of nearby sites including several within the CIQ such as Sheffield College of Music at 12 Sidney Street (just 160 metres from 60 Brown Street), and its Eyre Street and Matilda Street sites; as mentioned above the College runs a nearby nursery which is open to all; and it provides a huge range of courses for different ages and needs, including computing and robotics camps for children aged 7+ at its Lego Education Innovation Studio
- Other local education establishments within the CIQ (the entirety of which covers only ¾ of a square mile), most of them either brand new or new in the last few years, include Freeman College, UTC Sheffield, and a drama school that runs acting courses for teenagers and adults: <http://www.standbymethod.com/acting-programmes/young-peoples-programme/>.
- The Showroom: This has grown into the largest independent film house outside London and it is a family cinema. I have taken my children there and attended special family events. My daughter went with other pupils from her primary school to attend an awards ceremony for their work on an eco film. If Sheffield City Council were to conduct research like that carried out by Leeds City Council as to the public's view of sensitive buildings that should never have a strip club near them, the response would unquestionably be that it is unacceptable for a strip club to be positioned within sight of a family cinema like the Showroom.

#### Inappropriate layout and character of the premises, including private rooms which contributes structurally to a culture of rule-breaking including rules against touching and offering sexual services

The location at 60 Brown Street is inappropriate for a strip club regardless of the layout and particular way in which such a club might be operated. However the layout of Spearmint Rhino and way the premises are used is particularly inappropriate in that location because it includes a number of private so-called 'VIP rooms'

where customers can pay much higher sums of money than in the main public lapdancing area (typically £300 per hour) in order to be able to have a private session with dancers.

This layout contributes directly to a culture of rule-breaking by dancers including breaking rules against touching and offering sexual services. The club states that there is CCTV in all such rooms but the problem is that there is no structural incentive on the management of the club to enforce these rules; on the contrary there are strong incentives on both dancers and management to break the rules in order to obtain the most profit.

Spearmint Rhino have confirmed in previous licensing hearings that the dancers at the club are not employed, indeed many (it is said) are not even local to Sheffield, but are 'peripatetic' self-employed workers who rent space from the club in order to ply their trade. The club is able to maximise its income by having a large number of dancers at the club on a given night, each paying a significant sum for the right to be there. Some nights for example during the week will be quiet and dancers may not make enough from individual dances to be able to cover their costs of being at the club; however the club will require dancers to attend on less profitable nights as a condition of being permitted to attend on more profitable weekend evenings.

Testimony from former dancers makes it clear that this system operates structurally to create intense competition between dancers for limited custom, and that those who are not prepared to break the rules will lose custom relative to those who are prepared to do so.

Having private booths where both dancers and the club can potentially make much more money from rule-breaking without the scrutiny and regulation of being in a public area is extremely problematic for this reason and as a result many local authorities will not license strip clubs containing private booths or rooms.

For all the above reasons I ask the Licensing Committee to refuse to renew the licence of Spearmint Rhino at this location.

The Committee should take a fresh look and take account of the huge changes that have taken place in the area and in Sheffield more widely, and it should take account of the views of its electorate that this club is totally inappropriate in this location.

I look forward to hearing from you.

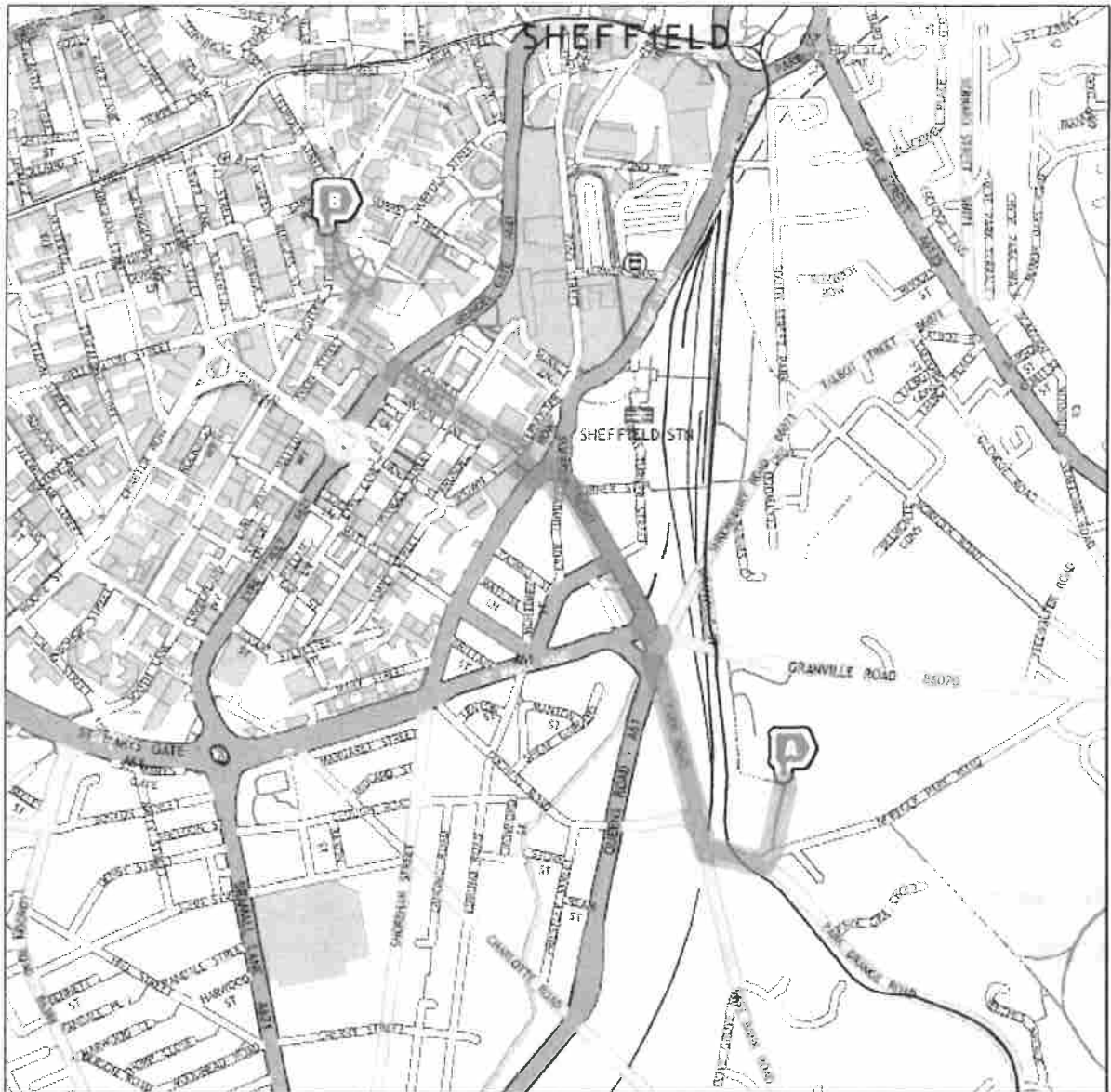
Yours sincerely

[PLEASE REDACT NAME AND ADDRESS]

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Sheffield walking directions from City Campus S2 2RL to Sheffield Town Hall  
**0.9 miles, 22 mins, 101 Cal (med pace)**



1. Start out along COLLEGE DRIVE, heading south.

---
2. After 100 metres bear right onto NORFOLK PARK ROAD, heading south.

---
3. After 20 metres bear right onto PARK GRANGE ROAD, heading north.

---
4. After 100 metres bear right onto EAST BANK ROAD, heading north.

---
5. After 54 metres continue straight onto FARM ROAD, heading north.

---
6. After 250 metres continue straight onto GRANVILLE SQUARE, heading north.

---
7. After 6 metres bear right onto GRANVILLE ROAD, heading north.

---
8. After 13 metres turn left onto PEDESTRIAN CROSSING, heading north.

---
9. After 18 metres turn left onto GRANVILLE ROAD, heading west.

---
10. After 13 metres turn right onto SUFFOLK ROAD, heading north.

---
11. After 250 metres continue onto LEADMILL ROAD, heading south.

---
12. After 37 metres bear left, heading west.

---
13. After 25 metres bear left onto SHOREHAM STREET at the T-junction, heading south.

---
14. After 11 metres turn right onto GRINDERS HILL, heading north.

---
15. After 48 metres turn right onto PATERNOSTER ROW, heading north.

---
16. After 18 metres turn left onto CHARLES STREET, heading north.

---
17. After 250 metres continue straight onto PEDESTRIAN CROSSING, heading north.

---
18. After 20 metres continue straight onto CHARLES STREET, heading north.

---
19. After 25 metres turn right onto NORFOLK LANE, heading north.

---
20. After 26 metres turn left onto CHARLES LANE, heading north.

---
21. After 47 metres turn right onto NORFOLK STREET, heading north.

---
22. After 55 metres turn left onto THE PEACE GARDENS, heading west.

---

23. You will reach your destination 100 metres along THE PEACE GARDENS.

Hill Profile



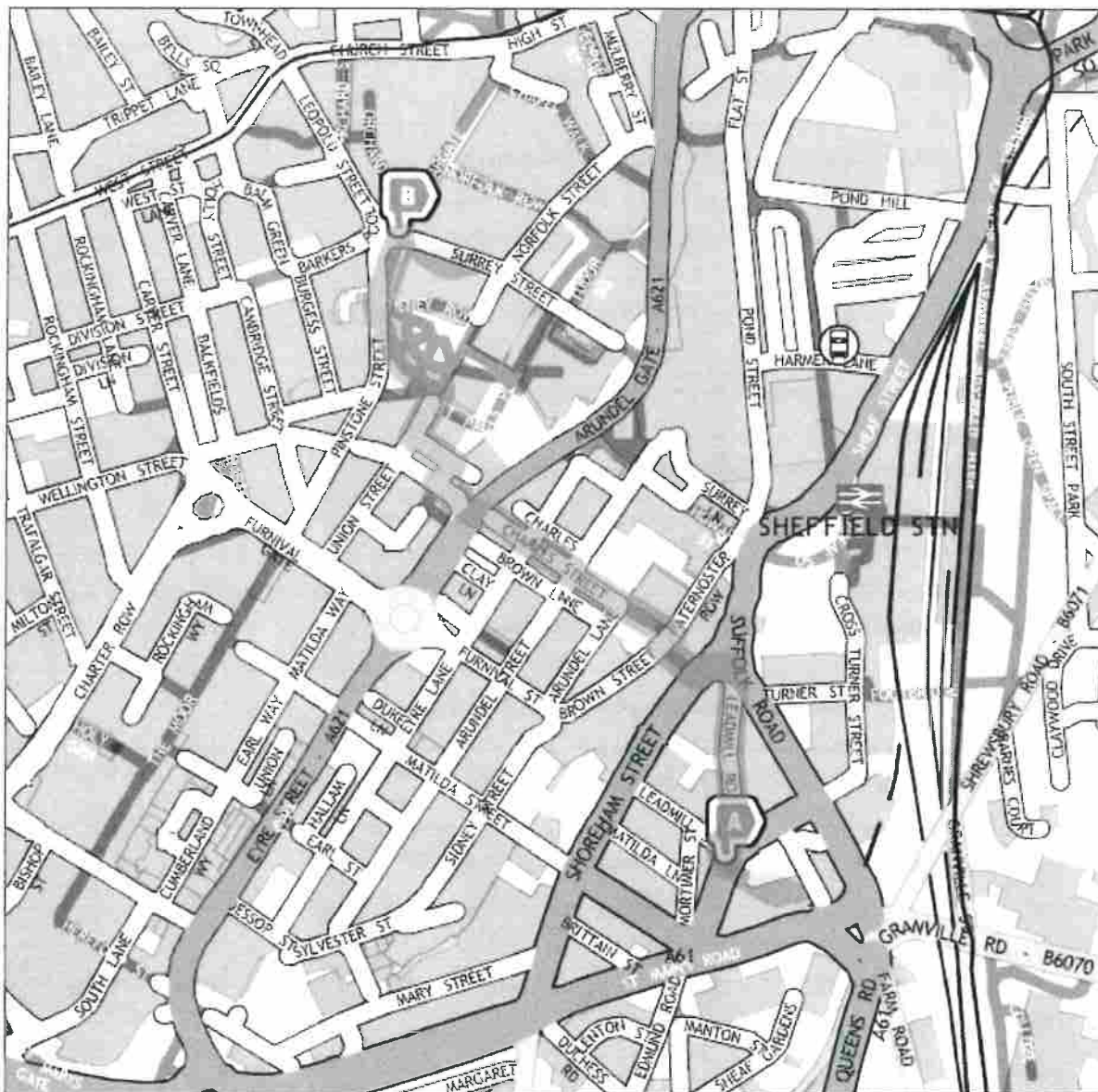


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Sheffield walking directions from 26 Leadmill Road to town hall

0.6 miles, 13 mins, 66 Cal (med pace)



1. Start out along LEADMILL STREET, heading north.

---

2. After 35 metres continue straight onto LEADMILL ROAD, heading north.

---

3. After 150 metres turn left, heading west.

---

4. After 25 metres bear left onto SHOREHAM STREET at the T-junction, heading south.

---

5. After 11 metres turn right onto GRINDERS HILL, heading north.

---

6. After 48 metres turn right onto PATERNOSTER ROW, heading north.

---

7. After 18 metres turn left onto CHARLES STREET, heading north.

---

8. After 250 metres continue straight onto PEDESTRIAN CROSSING, heading north.

---

9. After 20 metres continue straight onto CHARLES STREET, heading north.

---

10. After 25 metres turn right onto NORFOLK LANE, heading north.

---

11. After 26 metres turn left onto CHARLES LANE, heading north.

---

12. After 47 metres turn right onto NORFOLK STREET, heading north.

---

13. After 55 metres turn left onto THE PEACE GARDENS, heading west.

---

14. After 100 metres bear right onto PINSTONE STREET, heading north.

---

15. You will reach your destination 100 metres along PINSTONE STREET.

---


**Hill Profile**

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### Sheffield walking directions from cholera monument to 24 The Moor

**0.9 miles, 20 mins, 90 Cal (med pace)**



1. Start out along MONUMENT GARDENS, heading north.

---
2. After 150 metres turn left onto NORFOLK ROAD, heading north.

---
3. After 150 metres turn left onto SHREWSBURY ROAD, heading south.

---
4. After 150 metres turn right onto STEPS, heading west.

---
5. After 19 metres continue straight onto SOUTH STREET PUBLIC OPEN SPACE, heading west.

---
6. After 41 metres continue onto TRAMWAY CROSSING, heading west.

---
7. After 10 metres turn left onto GRANVILLE STREET (PATH ALONGSIDE TRAMWAY AT REAR OF STATION), heading south.

---
8. After 7 metres turn right onto FOOTBRIDGE, heading west.

---
9. After 100 metres continue onto STEPS, heading north.

---
10. After 29 metres continue onto TURNER STREET, heading west.

---
11. After 100 metres bear right onto SUFFOLK ROAD, heading north.

---
12. After 17 metres continue onto LEADMILL ROAD, heading south.

---
13. After 37 metres bear left, heading west.

---
14. After 25 metres bear left onto SHOREHAM STREET at the T-junction, heading south.

---
15. After 11 metres turn right onto GRINDERS HILL, heading north.

---
16. After 48 metres turn left onto BROWN STREET, heading south.

---
17. After 150 metres turn right onto FURNIVAL STREET, heading north.

---
18. Go to the left around FURNIVAL SQUARE roundabout, 150 metres on, and then turn off onto EYRE STREET, heading south.

---
19. After 100 metres turn right onto PEDESTRIAN CROSSING, heading north.

---
20. After 4 metres continue straight onto MATILDA STREET, heading north.

---
21. After 150 metres turn left onto THE MOOR, heading south.

---

22. You will reach your destination 100 metres along THE MOOR.

---

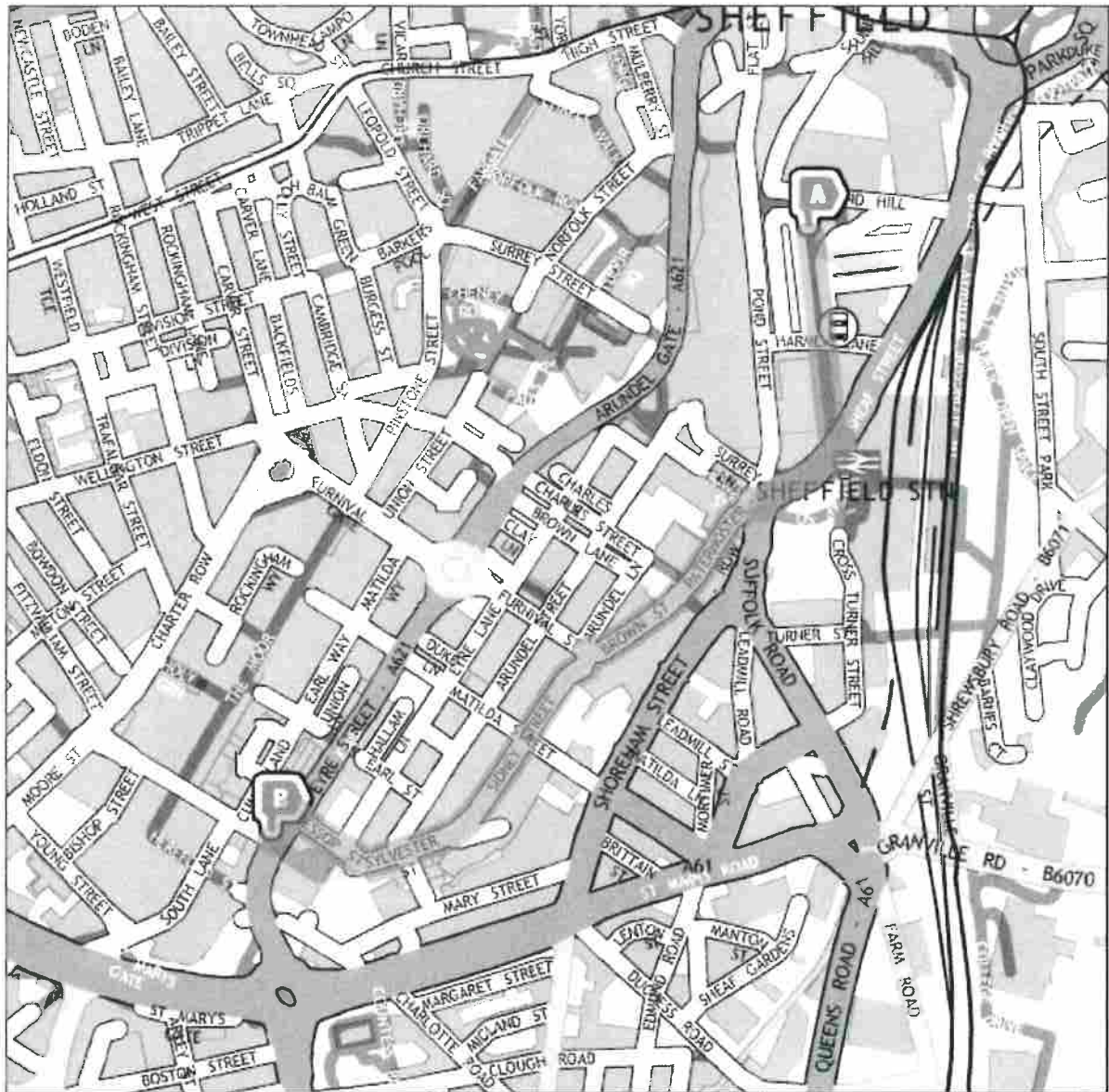
**Hill Profile**



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Sheffield walking directions from bus station to 199 Eyre Street  
0.7 miles, 15 mins, 72 Cal (med pace)



## Bower Claire

---

**From:** [REDACTED] on behalf of [REDACTED]  
**Sent:** 15 May 2018 23:49  
**To:** licensingservice  
**Subject:** Re: Objection to Spearmint Rhino Licence Renewal - Email 2 of 2  
**Attachments:** CIQ Area Action Plan.pdf

Please see further attachment in relation to my objection letter in my previous email - Area Action Plan for the Cultural Industries Quarter

On Tue, May 15, 2018 at 11:46 PM, [REDACTED] > wrote:  
Dear Licensing

Please see my attached letter objecting to the application for renewal of Spearmint Rhino's SEV licence, plus attachments:

4 x maps of walking routes from [walkit.com](http://walkit.com)

Area Action Plan for the Cultural Industries Quarter - **PLEASE NOTE THIS WILL FOLLOW IN A SEPARATE EMAIL**

Please can you acknowledge receipt.

I look forward to hearing from you.

Kind regards  
[REDACTED]

1. Start out along SHEFFIELD INTERCHANGE, heading south.

---

2. After 150 metres continue straight onto SHEFFIELD INTERCHANGE COVERED WALKWAY, heading south.

---

3. After 100 metres bear right onto SHEAF STREET, heading south.

---

4. After 100 metres turn right onto HOWARD STREET, heading north.

---

5. After 15 metres turn left onto PATERNOSTER ROW, heading south.

---

6. After 150 metres continue straight onto BROWN STREET, heading south.

---

7. After 150 metres continue straight onto SIDNEY STREET, heading south.

---

8. After 250 metres bear right onto SYLVESTER STREET, heading west.

---

9. After 100 metres bear right onto JESSOP STREET, heading north.

---

10. After 100 metres continue straight onto PEDESTRIAN CROSSING, heading north.

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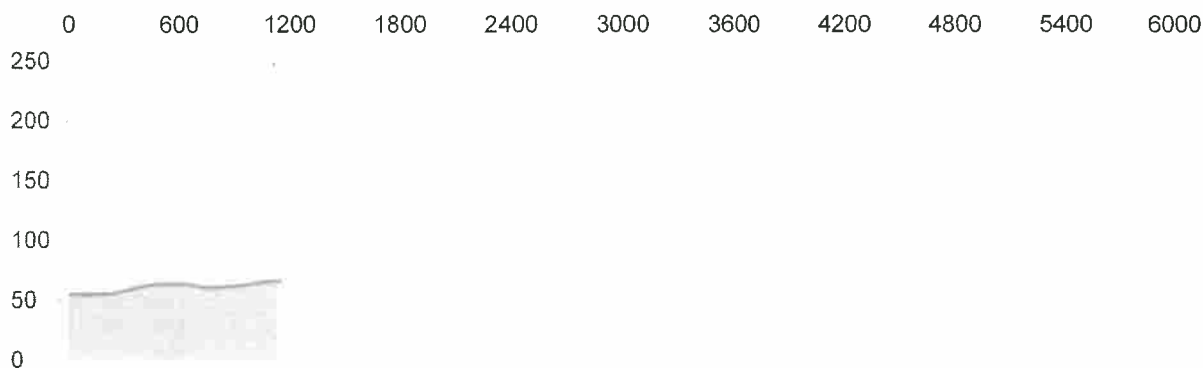
11. After 9 metres turn left onto EYRE STREET, heading south.

---

12. You will reach your destination 42 metres along EYRE STREET.

---

**Hill Profile**





**Bower Claire**

---

**From:** [REDACTED]  
**Sent:** 15 May 2018 23:02  
**To:** licensingservice  
**Subject:** Objection to Spearmint Rhino licence renewal  
  
**Categories:** Claire Bower

Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD  
[licensingservice@sheffield.gov.uk](mailto:licensingservice@sheffield.gov.uk)

15th of May, 2018

Dear Licensing Service,

**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, S12BS.

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 (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 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.”

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 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 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. 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, the number of lap dancing clubs has 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 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 look forward to hearing from you

*[Faint, illegible text]*



Licensing Service, Sheffield City Council, Block C  
Staniforth Road Depot, Staniforth Road, Sheffield

Email: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 2018 for Spearmint Rhino, 60 Brown Street, Sheffield S1 2BS on the following grounds;

- Strip/lap dancing clubs are a form of violence against women, promoting the idea that women's bodies can be bought; treating performers as commodities. This is dehumanising. If the performer really wanted to strip she wouldn't need to be paid to do so.
  - Testimonies from men who admit to using such establishments demonstrate that those men eroticise their power over the performer, getting a sexual thrill from control over her. This is related to the negation of, and absolute disregard for, her feelings within the financial transaction. This is toxic, abusive masculinity.
  - Many ex-strippers describe psychological harm experienced as a result of the work. This is trauma caused by dissociation, the act of separating minds and feelings from their bodies, in order to cope. Often, it is only when they have stopped stripping that the impact of that harm is realised. This is similar to the experiences of women leaving abusive relationships.
  - Condoning, by licensing, a club which is set up to profit from the objectification of women 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. This is not consistent with the Council's Equality duty to foster good relations between men and women.
  - Research suggests that men who hold objectifying views of women are more likely to be violent and to attribute responsibility (Victim blame) to women for violence perpetrated against them. Thus, in licensing Spearmint Rhino the Council may be compromising its own Domestic and Sexual Abuse strategy.
  - Many women have advised the Council of feeling unsafe in the vicinity of Spearmint Rhino and avoid walking past it. No woman should feel unsafe anywhere in the city.
  - The Council states explicitly that it is committed to reducing the objectification of women. SEV's of this type do not contribute to that aspiration. Spearmint Rhino actively contributes to the normalisation of objectification of women. It actively discriminates against women by promoting negative and limiting gender stereotypes and impacting on women's comfort and freedom in moving round the city. Neither is this consistent with the Council's obligations under the Equality Act 2010.
  - Spearmint Rhino is situated in a residential area now undergoing extensive re development. It is increasingly residential, with sites of cultural interest, charities providing support to vulnerable people, education providers and recreational areas in the vicinity. This gives further basis for refusal of the licence on the discretionary grounds available.
  - In conclusion 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
- PRINT NAME & ADDRESS



Licensing Service, Sheffield City Council, Block C  
Staniforth Road Depot, Staniforth Road, Sheffield

Email:licensing@sheffield.gov.uk

17 MAY

To Whom It May Concern

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PRINT NAME & ADDRESS



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Staniforth Road Depot, Staniforth Road, Sheffield

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149

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Block C  
Staniforth Road Depot  
Staniforth Road  
SHEFFIELD S9 3HD  
By email to: [licensing@sheffield.gov.uk](mailto:licensing@sheffield.gov.uk)

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- 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.
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[Redacted signature]

IT EXPLOITS  
WOMEN!!!

