

**Rhodes-Evans Emma (CEX)**

---

**Subject:**

FW: Objection to the re-licensing of Spearmint Rhino

O221

**From:****Sent:** 26 May 2019 07:48**To:** licensingservice**Subject:** Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicence on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

Sent from my Samsung Galaxy smartphone.

## Rhodes-Evans Emma (CEX)

---

**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

O222

**From:**

**Sent:** 26 May 2019 07:42

**To:** licensingservice

**Subject:** Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicense on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

Get [Outlook for Android](#)

**Rhodes-Evans Emma (CEX)**

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**Subject:**

FW: Objection to the re-licensing of Spearmint Rhino

O223

-----Original Message-----

From:

Sent: 26 May 2019 07:35

To: licensingservice

Subject: Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicense on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

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Sent from my iPhone

# **OBJECTION 0224 WITHDRAWN**

**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

O225

**From:**

**Sent:** 26 May 2019 03:14

**To:** licensingservice

**Subject:** Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to re-license on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

**Rhodes-Evans Emma (CEX)**

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**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

O226

**From:**

**Sent:** 26 May 2019 01:52

**To:** licensingservice

**Subject:** Objection to the re-licensing of Spearmint Rhino

We object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT appeal a decision not to relicense on the grounds of unsuitable locality, it would have to go to judicial review. However the Council has also lost two judicial reviews to a local resident.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

We hope that you turn down this licence.

Whether the women who work there love their job or not is not a consideration for licensing.

**Subject:** FW: Objection to re-licensing Spearmint Rhino

O227 P1

**From:**  
**Sent:** 26 May 2019 00:14  
**To:** licensingservice  
**Subject:** Objection to re-licensing Spearmint Rhino

Hello

I object to the re-license of Spearmint Rhino for the following reasons:

1. I am aware that many of the objections to the renewal of Spearmint Rhino's licence have been raised on previous occasions, and they have been dismissed. But each year social and cultural expectations move on, and the committee should try to come to this year's hearing with fresh ears and a new regard for how Sheffield wishes to position itself culturally, how it is seen by competitor cities, and what has happened in the city during the last year. I hope you will therefore take the progressive and enlightened step of applying the policy differently this year and refuse the application to renew.

2. The Council's policy on the siting of Sexual Entertainment Venues is very clear. You will not licence premises in close proximity to the cultural hub of the city, therefore you will refuse to renew the premises licence because clearly the premises is in the cultural industries quarter. Your policy is that premises will not be licensed in close proximity to a major gateway to city - and clearly it is close to the railway station and the Charles Street pedestrian route to the city centre. You will also not licence premises in close proximity to a city landmark. Clearly the Site Gallery, the Showroom and the HUBS building are significant city landmarks - in fact the Site Gallery is now positioning itself as a major national and international contemporary art gallery. So renewing the licence fails the council's own licensing criteria regarding the siting of such venues in the city's cultural hub, by a major gateway and close to landmark buildings.

3. There are also a number of statutory provisions which apply to every action the Council takes as a public authority. These include:

- a. its duty to have regard to the interest of all Sheffield's tax payers;
- b. its Human Rights Act obligations;
- c. its duty to have due regard to the statutory obligations in relation to gender.

I would argue that under these provisions renewing the licence would mean that the council failed in its duty to treat everyone equally, with fairness, dignity and respect.

4. The licensing committee should make a decision which takes account of its own policy and statutory obligations and refuse renewal. While renewal again does not accord with the council's own policy, this year the committee's decision making process **must** take account of an evolving social environment and contemporary values. This year renewal would appear more retrogressive, more inappropriate, and potentially more questionable than last year. The renewal of the licence will create a strong negative impression that Sheffield's licensing committee encourages the view of women as a commodity to be bought. In light of this it is imperative that this year the committee is absolutely confident that renewal would not promote a cultural attitude that allows and feeds underage sexual exploitation of the vulnerable in our towns and cities, thereby contributing to violence and harm. SCC should be doing everything in its

power to reduce the influences in the city which may have contributed to the sexual exploitation of children and vulnerable people in Sheffield and adjacent towns.

5. Recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. It seems that the Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder appears to be unfit.

6. If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.



**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

O228

-----Original Message-----

From:  
Sent: 26 May 2019 00:04  
To: licensingservice  
Subject: Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicense on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

Promoting the dignity and equality  
of every creature on the planet.  
Care for our Common Home.

**Subject:**

FW: Objection to the re-licensing of Spearmint Rhino

O229

-----Original Message-----

From:

Sent: 25 May 2019 22:11

To: licensingservice

Subject: Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicense on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield.

The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

**Rhodes-Evans Emma (CEX)**

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**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

O230

**From:**

**Sent:** 25 May 2019 21:56

**To:** licensingservice

**Subject:** Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicense on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

0231

-----Original Message-----

**From:**  
**Sent:** 26 May 2019 09:08  
**To:** licensingservice  
**Subject:** Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicense on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

Sent from my iPhone

**Rhodes-Evans Emma (CEX)**

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**Subject:** FW: Spearmint Rhino - SEV licence application - Objection  
**Attachments:** SR licence objection letter.docx

O232 P1

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**From:**  
**Sent:** 26 May 2019 08:59  
**To:** licensingservice  
**Subject:** Spearmint Rhino - SEV licence application - Objection

Dear Licensing

In reference to the current application for a Sexual Entertainment Venue (SEV) licence by Spearmint Rhino, 60 Brown Street, Sheffield, S1 2BS I herewith submit my letter of objection.  
I urge the council to refuse the application on the grounds detailed in the attached letter.

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)

26<sup>th</sup> May 2019

Dear Licensing

I refer to the application for a Sexual Entertainment Venue (SEV) licence by Spearmint Rhino, 60 Brown Street, Sheffield, S1 2BS.

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

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

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

Sheffield City Council has "statutory obligations in relation to disability race and gender" (sic as the protected characteristic under the Equality Act 2010 is "sex" and not "gender") ensuring that these factors are not used to discriminate against anyone. I believe that sexual entertainment venues directly discriminate against women by normalising the sexual objectification of women which contributes to their sexualisation and objectification in other areas of society. SEVs are both cause and effect of inequality between the sexes.

The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty (PSED), including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

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

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

Kolvin continues with:

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

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

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

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

Not only do strip clubs appeal to a narrow sector of the community, mostly heterosexual men, they are also antithetical to fostering good relations between the sexes. In their UK study published in 2011 Sanders and Hardy [4] reported that 30% of the women performers interviewed said that as a result of doing the job they had lost respect for men; a finding echoed in many testimonies of former performers, including those who objected to last year’s licence renewal where at the hearing, one former dancer stated “I was viewed and treated like a second-class citizen and not just in one club but in all, this made me hate men to an extreme level, they repulsed me.”[5]

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

#### **Location**

In its current policy, the Council states:

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

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

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC 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 in the centre of the newly designated “Knowledge Gateway”.

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

There is the recreational space (formerly known as Festival Square but now named as Cultural Industries Quarter Square on the map of the area which can be found on Sheaf Square) directly adjacent to the club.

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

There are a number of charities and organisations in the area which support vulnerable children and adults, many of whom will have PTSD.

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

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

It is also opposite the newly refurbished Site Gallery, Sheffield’s international contemporary art space, specialising in moving image, new media and performance. Spearmint Rhino is not only centrally located in terms of proximity to a number of national and international events locations but it is also a direct access route, for example: Doc Fest; the children’s media conference; Off the Shelf etc.

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

**Further grounds for refusal**

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

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

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

*“Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license.”[6]*

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.



When Philip Kolvin represented residents objecting to the renewal of the strip club in Chester in 2015, it is reported that:

*"Their representative Philip Kolvin QC told the meeting that 2009 legislation meant communities now had more say in where such sexual entertainment venues should be located. What Mr Grant had dubbed an 'extraordinary campaign', he called 'the working of democracy'."*

It is further reported:

*"But Mr Kolvin pointed out that this year's committee was entitled to come to an opposite conclusion to last year's committee even where nothing had changed: 'The courts have said that you can respond to a body of feeling in the locality, merely the fact that a number of people are concerned about this justifies refusal.'"*  
(emphasis added) [7]

Please note that the licence renewal was refused. As such, the Council is fully empowered to refuse the licence, particularly in view of the widespread breaches to conditions, recently reported in the local and national press and presented to the Council in April this year.

I look forward to hearing from you.

Regards



#### References

- [1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87
- [2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in *Criminal Justice Matters*, 88:1, 10-12.
- [3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87
- [4] Sanders, T., & Hardy, K. (2011) 'The Regulatory Dance: Sexual Consumption in the Night Time Economy – Initial Findings' Leeds: University of Leeds
- [5] Sheffield Telegraph: 'Why we want Sheffield to be a strip-club-free city' April 5th 2019 <https://www.sheffieldtelegraph.co.uk/news/why-we-want-sheffield-to-be-a-strip-club-free-city-1-9695166>
- [6] Kolvin, P op cit. p. 90
- [7] Chester Live: 'Chester Platinum Lounge lap dancing club waits for licensing decision' July 18<sup>th</sup> 2015 <https://www.cheshire-live.co.uk/news/chester-cheshire-news/chester-platinum-lounge-lap-dancing-9610810>

**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

O233

-----Original Message-----

From:  
Sent: 26 May 2019 09:45  
To: licensingservice  
Subject: Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicense on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

Sent from Aye pad  
N

**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

O234

-----Original Message-----

From:  
Sent: 26 May 2019 09:53  
To: licensingservice  
Subject: Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicense on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

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**Rhodes-Evans Emma (CEX)**

---

**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

O235

-----Original Message-----

**From:**  
**Sent:** 26 May 2019 10:12  
**To:** licensingservice  
**Subject:** Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicense on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

Sent from my iPhone

## Rhodes-Evans Emma (CEX)

---

**Subject:** FW: Spearmint Rhino - application to renew licence

O236

**From:**

**Sent:** 26 May 2019 10:42

**To:** licensingservice

**Subject:** Spearmint Rhino - application to renew licence

I wish to object to the license application of Spearmint Rhino, Brown Street, Sheffield because

1. I work as a counsellor at Sheffield Rape and Sexual Abuse Centre. I work with vulnerable people who have been traumatised by sexual violence. There are also several other charities in the immediate area who work with vulnerable women, men children and young adults. Many students live here too. It is not appropriate that the Council should licence a sexual entertainment venue in this area.
1. I have heard that there is an investigation into practices currently going on in the club that are not allowed under the current licence. I do expect that you would renew the licence if the investigation finds there has not been complete compliance to the current terms of the licence.
2. Licensing Spearmint Rhino is not conducive to the Council's Public Sector Equality Duty in which you have a duty to have regard to the need to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between the sexes.
3. More and more local (including people like myself who work there and therefore have a vested interest in the area) people object to Spearmint Rhino being licenced in this area.

I therefore urge the Council to refuse this license application.

Yours sincerely



Virus-free. [www.avast.com](http://www.avast.com)

**Rhodes-Evans Emma (CEX)**

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**Subject:** FW: Spearmint Rhino licensing objection - [REDACTED]  
**Attachments:** Spearmint Rhino objection - [REDACTED] 2019.docx; Spearmint Rhino objection - [REDACTED] 2019.pdf

O237 P1

**From:**  
**Sent:** 26 May 2019 11:25  
**To:** licensingservice  
**Cc:**  
**Subject:** Spearmint Rhino licensing objection - [REDACTED]

Please find attached my objection to the renewal of the license of Spearmint Rhino.

I look forward to hearing from you with confirmation of receipt and details of the hearing.

Yours sincerely

26<sup>th</sup> May 2019

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 Grounds****i) Character of the relevant locality****(a) the fact that the premises are sited in a residential area;**

I refer you to much of my previous submission from 2018, which still applies in terms of the objections raised a year later:

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

This is evidenced by the following report from the Sheffield Star on 16<sup>th</sup> January 2018:

<https://www.thestar.co.uk/news/dramatic-rise-in-the-number-of-people-living-in-sheffield-city-centre-1-8960059>

In particular, your attention is drawn to the following extracts:

*Speaking at a business conference at Cutlers' Hall on Thursday, **Edward Highfield, Sheffield City Council's Director of City Growth**, said the city centre's residential population had risen from 6,000 to 30,000 over the last 10 years.*

***Coun Mazher Iqbal**, the council's cabinet member of business and investment, said increasing the number of people living in the city centre was "very important" to the council.*

*He said: "It's good to see the number of people living in the city centre is on the rise but I hope we can double it... There is a really good mix in the city centre. We have got students, young professionals and now we have got families too... The city centre is about people that come and visit it, visitors who come and see our attractions, people who work in the city centre and then those who live in the city centre. It's the same as any other neighbourhood - we have to get the mix right."*

*Sheffield Central **MP Paul Blomfield** said: "I think it's hugely important and very positive that we have more people choosing to live in the city centre. It means we have to rethink the modern city centre - balancing out the need to live, work, shop and indeed study and that's a radical change for the city centre compared to the one that I knew when I was kid in Sheffield."*

Further evidence is provided by the following article from the Sheffield Telegraph regarding the development of the CIQ through an increase in residential and commercial properties -

<https://www.sheffieldtelegraph.co.uk/lifestyle/property/new-build-to-revitalise-steel-city-s-ci-q-1-8881810>

**(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;**

**These include the following:**

Showroom Cinema – home of the Children's Media Festival, Sheffield Adventure Film Festival, DocFest and various other events

- The Work Station
  - A regular fun fair at the train station
  - Festival Square
  - Sheena Amos Youth Trust
  - Sheffield Hallam University and Student Union
  - The Leadmill
  - Red Tape Central
  - Sheffield Train Station
  - Sheffield Bus Station
  - The Site Gallery
  - Ofo bike docking station
  - Sheffield University Technical College
  - The Great Escape Game
-



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

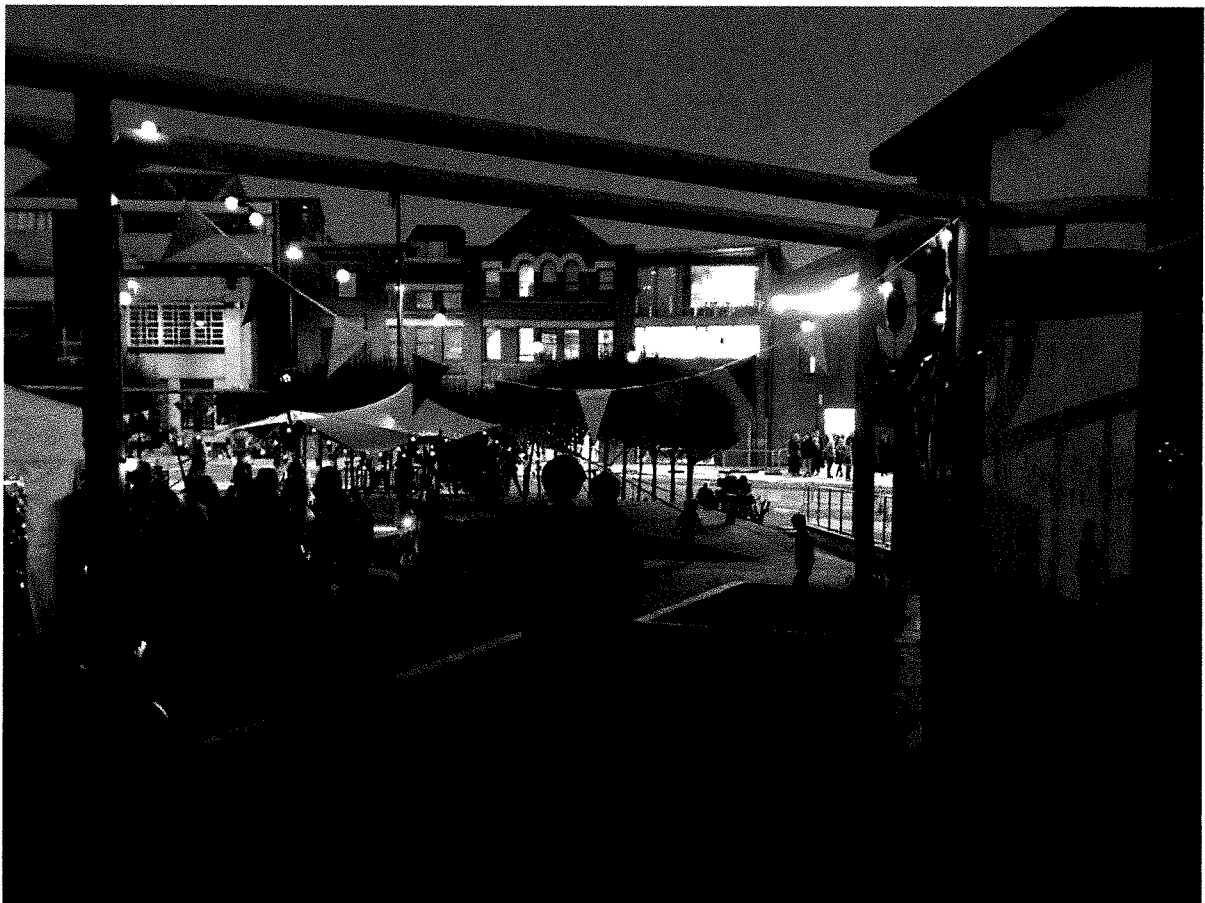
These include the following:

- Showroom Cinema
- Yorkshire Art Space
- Rutland Arms pub
- The Hubs
- Steelworks Studios
- Sheffield City Archives
- Millennium Galleries
- The entire CIQ
- APG Works

Following the renewal of the license for Spearmint Rhino last year, **the Site Gallery**, situated directly opposite, announced full details of its reopening programme following a £1.7million development by architects DRDH –

<http://www.welcometosheffield.co.uk/visit/news/2018/aug/30/site-gallery-announces-reopening-following-a-1-7million-development>

A weekend of celebrations took place in Festival Square/Pinball Park at the end of September 2018. The party and events over the course of the weekend were well attended, including by children, as you can see in the photo below, whilst being situated directly next to the Spearmint Rhino building.



Part of the re-launch included work undertaken by the landscape, art and architecture practice, Wayward, to develop a strategic vision for the future of The Square (Pinball Park) in the heart of Sheffield's Cultural Industries Quarter.

With funding from Arts Council's Ambition for Excellence fund and Sheffield City Council, Wayward invite the local community to join in, show support and have a voice in **developing a shared vision for Sheffield's public realm** with a view to connecting communities of interest in the CIQ. Wayward described their work as follows:

*“Through regular talk night Site Sessions, the commission of new public artworks and collaborating with city planners, contractors and architects, we aim to **energise** and build the **viability, visibility and visit-ability** of the area.”*

A recent walk through the area, where Spearmint Rhino is situated on Friday 17<sup>th</sup> May 2019, revealed huge developments in keeping with the Council-sponsored plans for the Knowledge Gateway that are due to be completed in June 2019. In particular, the Showroom Cinema now has a stylish outdoor terrace, which adds to the appeal and status of this establishment as an icon in our city as described by the Star:

*“The place occupies one of the **best and most prominent spots** in Sheffield. Elevated halfway up a hill, the art deco building is **one of the first things people see** when leaving the railway station – a **cultural beacon** that brings audiences the latest films across four screens, from mainstream movies to foreign pictures, as well as educational classes, talks and seasons dedicated to critically-acclaimed directors.*

*But that's only part of the offering. There is also a popular café bar, **recently extended with a stylish outside terrace**, while next door sits the Workstation, which is part of the same complex and provides space for businesses, primarily those in the creative and digital industries.”*

Full article here -

<https://www.thestar.co.uk/whats-on/ian-wild-the-showroom-cinemas-chief-executive-we-screen-films-that-wouldnt-be-seen-in-sheffield-otherwise-40283>

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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**

**These include the following:**

- The Sheffield College Granville Road campus and UTC
- Freeman College
- Showroom Cinema
- The Workstation

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

**These include the following:**

- Festival Square now named as Cultural Industries Quarter Square
- Porter Brook Pocket Park
- Also see (e) under (i)

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

**These include the following:**

- Sheffield Rape Crisis
- Sheena Amos Youth Trust
- Addaction Sheffield
- Together Women Project

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

See (e) under (i)

**(e) 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. Nalin Seneviratne, Director for City Centre Development at Sheffield City Council submitted an objection along similar lines in 2018.

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## **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)

The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality.

You will be aware that the entire Council is required to give due regard to the Public Sector Equality Duty and this is exemplified by the role of the DACT and other partners in supporting the 'Know the Line' campaign against sexual harassment, which launched in Sheffield in November 2017.

<https://sheffieldsdact.org.uk/domestic-abuse/uncategorized/know-the-line-campaign-against-sexual-harassment-launches-in-sheffield/>

With support from the SYPCC, local MPs and Superintendent to make Sheffield a safer place for everyone, and recognising how misogyny, sexual harassment and sexual objectification of women relates to that, I would urge the Licensing Sub-Committee to refuse the license renewal for Spearmint Rhino on the grounds that it does not fulfil any of the following requirements of the PSED:

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

The Council has, in recent times, twice lost judicial reviews into its application of the Public Sector Equality Duty and Gender Equality in relation to Sexual Entertainment Venues.

### **Breaches of the license**

Through my role as a Senior Caseworker to a local MP, I have anecdotal evidence that lapdancers who work at Spearmint Rhino are expected to provide "extras to punters".

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. The conditions of the license have clearly been breached and should therefore be revoked, as per the same considerations given to other licensed establishments that breach their license conditions to such an extent.

Yours sincerely

**Rhodes-Evans Emma (CEX)**

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**Subject:** FW: Spearmint Rhino Objection  
**Attachments:** ObjectionSRLicenceRenewal 2019.docx

O238 P1

**From:**  
**Sent:** 26 May 2019 12:44  
**To:** licensingservice  
**Subject:** Spearmint Rhino Objection

Good afternoon

Please find attached my objection to Spearmint Rhino's licence renewal.

Please ensure my name and address are fully redacted as objectors are getting a lot of abuse and harassment.

Many thanks and best wishes

26<sup>th</sup> May

Dear Licensing

I am writing to object to the relicensing of Spearmint Rhino because strip and lap dancing clubs are outdated and harmful and promote inequality between women and men, which is incompatible with the Council's obligation under the Public Sector Equality Duty. Spearmint Rhino has no place in this city and its current location is particularly problematic being next to Sheffield Hallam University student's union, opposite the Site Gallery and Showroom Cinema- both used by children and families -and near Freeman College, attended by many vulnerable young people. On grounds of location listed in the council's SEV Policy the license can be declined

As a mother of two, one of whom is in his first year at university and one who is completing her A levels, I am horrified that a club of this nature, with alleged sexual activity as part of its "entertainment" is in the middle of a student campus and next to a student accommodation block. Having worked at SHU and through my experiences with my own children, I know how vulnerable first year students are when many are away from home for the first time.

I also know how many women, of all ages, fear being near the club at the night. The reports of the alleged breaches do nothing to allay those fears, in fact, they exacerbate them.

This council has already been subject to two judicial reviews about its failure to consider the effects on all women of licensing strip clubs. On both occasions it has lost. Strip clubs promote a message that it is acceptable to buy women's bodies for sexual gratification, thus treating women as sex objects. This at a time of greater awareness of the impact of such views on both women's sense of safety and their actual safety and no evidence that violence against women, including street harassment of women, is decreasing. Research shows that men who hold objectifying views of women are more likely to be violent to women. In licensing Spearmint Rhino Sheffield City Council gives a confusing message about its commitment to women's safety and equality.

Women have a right to employment which is safe and not exploitative nor psychologically harmful. There is information about the impact of working in such establishments, including from women who have worked in them, about sexual harassment and assault of the women performers by users and even staff and evidence suggests that this is rife.

The publicity surrounding this club's ongoing controversial presence indicates that in a number of such establishments, including Spearmint Rhino Sheffield, breaches of the licensing conditions of a sexual nature, which have not been picked up by the councils' own inspections, are

widespread across the industry. This attests that regulation of an inherently unsafe and unfair working environment is impossible. In Spearmint Rhino Sheffield evidence of unlawful sexual activity is also under investigation.

Given this I can see no reason for Spearmint Rhino to retain its license. As the law permits a local authority to decide not to allow any strip and lap dancing clubs within its area, I would like the licensing hearing to refuse this license, provide support services for women who may be affected and to address this aspect of inequality between the sexes by undertaking a comprehensive overview of the links between the sex trade, female poverty and violence against women to inform future policy making.

## Rhodes-Evans Emma (CEX)

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**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

O239

**From:**

**Sent:** 26 May 2019 13:25

**To:** licensingservice

**Subject:** Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicence on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.



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## Rhodes-Evans Emma (CEX)

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**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

O240

**From:**

**Sent:** 26 May 2019 13:28

**To:** licensingservice

**Subject:** Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicense on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

Sent from Yahoo Mail on Android

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