

Rhodes-Evans Emma (CEX)

Subject: FW: Objection to Spearmint Rhino application to renew SEV licence
Attachments: SR Objection May 2019.docx

O321 P1

From:
Sent: 27 May 2019 16:57
To: licensingservice
Cc: Bower Claire
Subject: Objection to Spearmint Rhino application to renew SEV licence

Dear Licensing Service,

Please see attached my objection to Spearmint Rhino's licence application.
Please confirm receipt.

Yours sincerely

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

27 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.

In summary, I believe that the Council should refuse the licence application because:-

1. **The location is inappropriate by reference to the council's own policy and the overwhelming views of local people and businesses, particularly with the inclusion of private 'VIP rooms' which render it impossible to prevent illegal prostitution and breaking of no touching rules:**
 The location, 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. 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.
2. **Granting a further 12-month licence is incompatible with the council's Public Sector Equality Duty (PSED) under the Equality Act 2010:** I believe granting a further licence would 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, 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.

The law and policy the council needs to apply

In previous years the council has shown a poor understanding of the law about licensing of sexual entertainment venues and especially about how that ties in with its mandatory duties under the Equality Act. This has led to it losing not just one but two judicial reviews in rapid succession, at vast cost to the taxpayer, one for its unlawful decision in 2017 to re-license Spearmint Rhino and another one in 2018 for its unlawful policy on SEVs and other Sex Establishments. In the first case claimants argued successfully that the council had failed to give due regard to the public sector equality duty, including failing to address concerns about the proximity of Spearmint Rhino to university buildings and other premises with sensitive uses, and the impact in PSED terms on students and other vulnerable people, and also wrongly ignoring objections based on the potential impact on gender equality, treating them as 'moral' objections and irrelevant. The judge in the second case, Mrs Justice Philippa Whipple, criticised the council saying "This is the second judicial review the council has conceded on the same issue, and conceded on public sector equality duties grounds on both occasions. That is disappointing. I hope the council will take it seriously." Despite that the council still has

not produced an amended policy addressing the deficits with the previous one including the decision to allow an unlimited number of SEVs in the city, without addressing how this complies with the PSED.

In previous years whilst apparently ignoring the large number of objections addressing the relevant legal criteria the council also appears to have been heavily swayed by irrelevant considerations and misleading or incorrect legal and factual assertions put forward by representatives of the club, for example:-

- **The assertion made by the club's barrister at the hearing in June 2018 (and in previous years) that legally, where a council has granted an SEV licence in a previous year, it would 'need a good reason to depart from that decision in successive years', and, even more specifically, his assertion that 'There is no reason that would allow you [the council] to make that decision [to refuse the licence in 2018]'** (emphasis added) – i.e. that a particular licensing sub-committee considering the criteria for granting a licence in a particular year has no discretion or power to take a fresh overall view of the evidence available to it at that time and potentially to come to a different view than a previous sub-committee, even in the absence of any material change of circumstances but simply because of taking a different view reflective of the changing view of the electorate that the sub-committee represents.

Yet this is exactly the nature of the discretion that the council is empowered and indeed obliged to exercise when it considers each application for a new licence afresh each year. This is fundamental to the legislation that the council is required to apply (Schedule 3 of the Local Govt Miscellaneous Provisions Act, brought in by the Policing and Crime Act 2009) which was expressly introduced in order 'to give local people greater say over the number and location of lap dancing clubs in their area' (Home Office guidance for local authorities in applying Schedule 3) and give 'a wide discretion to licensing authorities, in particular in forming **value judgments** as to whether the grant or renewal of a licence would be appropriate in that locality' (*R (ex parte Thompson) v Oxford City Council* [2014] EWCA Civ 94 at [25]; emphasis added). It was 'a deliberate act by Parliament so as to widen the grounds upon which a licence for an SEV might be refused and also to enable such discretion to be exercised annually' (*R (ex parte KVP Ent Limited) v South Bucks DC* [2013] EWHC 926, at [17]), with councils being required to consider each such application afresh and according to the same criteria as if it were a new licence.

Case law has repeatedly reinforced the principle that 'a later committee is entitled to take a fresh look and is not bound in any way by the views of an earlier one' (eg *Bean Leisure and Ruby May v Leeds City Council* [2014] EWHC 878 at [53]), highlighting for example that 'On an application to renew an SEV licence it is not necessary for an objector to demonstrate that something has changed since the decision granting the licence. Were the position otherwise, the efficacy of annual reconsideration would be much reduced' (*Thompson*, at [35]).

Case law has also focused on Parliament's intention in excluding any right of appeal under the Schedule 3 legislation against a refusal of a licence based on a decision that granting or renewing it would be inappropriate: the courts have made clear that this is precisely to prevent courts interfering in local councils' exercise of discretion and value judgements, involving 'a significant evaluative power for the local authority at two levels: first, in assessing whether the grant or renewal of the licence would be "inappropriate" – which is a very broad and general concept; and, secondly, in assessing the character of the relevant locality – which, again, involves questions of fact and degree and local knowledge which important, at that level also, a broad power of evaluative judgment to be exercised by the local authority.' (*KVP Ent Ltd*, at [12])

The courts have also emphasised that ‘the reasons for not reaching the same conclusion as a previous decision are infinitely variable and may range from where a subsequent committee takes a different view of unchanged circumstances to where circumstances have changed to such an extent that the basis for the previous decision has ceased to apply; and it may involve a combination of changed circumstances and a different view being taken of those that are unchanged.’ (*Bean Leisure*, at [52]) In particular the court’s have highlighted the importance of the changing composition of a licensing committee being able to be reflected in them changing their view: “the legislature must be taken to know that a local authority is a body of changing composition and shifting opinion, whose changes and shifts reflect the views of the local electorate... What is “appropriate” may be the subject of different perceptions by different elected representatives.” (Mann LJ in *Sheptonhurst*)

- **The response of the club’s barrister at the hearing in June 2018 to a question by Cllr Josie Paszek about how the club protects dancers and ensures compliance with ‘no touching’ and other rules within the private rooms as opposed to the main public lap-dancing area:** the barrister replied referring to private booths (rather than private rooms as per the question) and saying that ‘There are different definitions [of private booths], it generally means the fourth side is closed off so you can’t see in, we don’t have those, there is always a view in’; this was extremely misleading in ignoring the ‘VIP rooms’ that Spearmint Rhino has which are not only on completely enclosed but are on a different floor from the main public area. The council will be aware that some of the most serious illegal activity and rule-breaking reported by ex-police undercover investigators at Sheffield Spearmint Rhino when they visited on successive occasions in early 2019 took place in the ‘VIP rooms’ – though persistent rule-breaking and illegal activity also took place in the more public areas.
- **The council appears to be increasingly targeted by arguments by the club’s representatives, dancers and other supporters of strip clubs and the sex trade more widely (including campaigners for the decriminalisation of prostitution) that continued licensing of Spearmint Rhino and other SEVS is necessary in order to provide work for economically and socially vulnerable women within a relatively safe part of the sex industry, who would otherwise be driven into more dangerous sex work:** These arguments fail to address the relevant criteria, they are irrelevant factors, and they are extremely revealing about the reality of the strip industry which is fundamentally based on conditions which force women to compete for scarce business by routine rule-breaking and blurring the boundaries between prostitution and stripping.

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 a 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 incredible that the Council has continued to grant a licence to a strip club in such a central and prominent location, which is unquestionably damaging to equality, 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 makes a mockery of 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) – **bearing in mind that in the existing licence conditions for the club, there is a ban on advertising in the 'immediate vicinity' of the club which is defined as within 440 yards of the premises (= 402 metres)**
- 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 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 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 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 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 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, 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 6 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://thegreatescapegame.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 $\frac{3}{4}$ of a square mile), most of them either brand new or new in the last few years, include Freeman College, UTC Sheffield (which caters for children from 13), 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]

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

O322

From:

Sent: 27 May 2019 16:52

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 - a University campus and cultural quarter are inappropriate places for this. I believe 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 prevent breaches in Sheffield. The licence holder seems clearly unfit to comply. 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.

Thanks and regards

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

O323

From:
Sent: 27 May 2019 16:10
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. 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 and will therefore be difficult to prevent crime and disorder and abide by equality law.

To license this club will be licensing a venue which will breach its licensing conditions and put women at risk.

Sent from my Huawei Mobile

Subject: FW: Objection to Spearmint Rhino licence renewal

O324 P1

From:
Sent: 27 May 2019 22:19
To: licensingservice
Subject: Objection to Spearmint Rhino licence renewal

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

- **Character of the Locality & Use of Other Premises**

Location wise it is close to ;
the city centre, train station, residential units, Hallam University, the rich cultural industries quarter encompassing art galleries, Yorkshire Art Space and the Showroom Cinema, SRASAC (Sheffield Rape and Sexual Abuse Centre).

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.

As a family we are members of the Showroom Cinema and are frequent visitors. As a mother of 3 children it is extremely uncomfortable having to walk past the club, which looks quite sinister, and answer questions from them about what it is. The presence of a strip club here clashes with our family values and desire to promote healthy and loving relationships between people.

- **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.

Having used the specialist services of SRASAC myself I can say first hand that it is totally inappropriate to site a strip club at such close proximity.

The needs of young and extremely vulnerable people should be a priority over those of a branch of a multi-million international chain of strip clubs.

As the first city of sanctuary in the UK, Sheffield should be trailblazing for a cultural shift to champion equality of all kinds by abolishing all strip clubs.

Women in Britain suffer disadvantages in all areas of life. The topics of gender pay gap and sexual exploitation and abuse continue to dominate the headlines. In my view the club, Spearmint rhino embodies and promotes both of these illegal and divisive phenomena. Sheffield City Council should not renew this club's licence.

I sincerely hope you take my objections on board when considering this licence renewal.

With best wishes

Rhodes-Evans Emma (CEX)

Subject: FW: Objection to re - licensing of Spearmint Rhino, Brown Street, Sheffield -2019
Attachments: SR Objection 2019.docx

O325 P1

From:
Sent: 27 May 2019 22:51
To: licensingservice
Subject: Objection to re - licensing of Spearmint Rhino, Brown Street, Sheffield -2019

Dear Licensing Authority,

Please find attached letter of objection re; licensing of Spearmint Rhino Sheffield 2019.

Your Sincerely,

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

27th May 2019

Dear Madam/Sir

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. As someone who works with vulnerable women in Sheffield, I often refer clients to specialist services such as SRASAC, a support service for survivors of sexual violence who are based in the area. I am concerned about the potentially traumatic impact this may have on women who have to walk in the vicinity where Spearmint Rhino's is, in order to access SRASAC. As someone who works and socialises in the area, often attending events at The Site Gallery, The Workstation and The Showroom, I am uncomfortable with being in and around the area in the evening as a lone woman due to safety concerns. On grounds of location listed in the council's SEV Policy the license should be declined

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.

I am also aware of information from local publicity which indicates that in a number of such establishments, including Spearmint Rhino Sheffield, there have been significant breaches of the licensing conditions which have not been picked up by the council's own inspections. 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)

Subject: FW: SPEARMINT RHINO
Attachments: SR RESPONSE TB 2019 (2).docx

O326 P1

From:
Sent: 27 May 2019 23:09
To: licensingservice
Subject: SPEARMINT RHINO

Dear Licensing Service,

I attach my objection to the granting of a licence to Spearmint Rhino.

I would like to be invited to the meeting on June 11th.

Thanks.

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

26 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, which are detailed in the template letter that, no doubt, other objectors will have submitted:

The Public Sector Equality Duty and Gender Equality

Location

- a) a school, nursery or other premises substantially used by or for children under 16 years of age;
- b) a park or other recreational area used by or for children under 16 years of age;
- d) a Hospital, Mental Incapacity or Disability Centre or similar premises;
- f) a central gateway to the city or other city landmark, historic building or tourist attraction.

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."[1]

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) [2]*

Please note that the licence renewal was refused. As such, the Council is fully empowered to refuse the licence.

Widespread breaches to conditions, recently reported in the local and national press and presented to the Council, in April this year. A small sample of this reported evidence is shown overleaf in the form of a graphic. This shows, in **bold**, some of the Rules that are, we have been told in the past, rigorously upheld and enforced in all Spearmint Rhino establishments. The 8 statements in italics are abstracts from the detailed evidence, collected by former police officers, and presented to the Sheffield Licensing Service, showing 116 examples of the breach of these rules at the Sheffield establishment. [The full report can be found at <https://t.co/vEkBB4mFSY?amp=1>, accessed on 26.05.19. The reference numbers and letters in the graphic have been added here - they are not in the original Report].

The applicant and current Licence Holder is thus clearly either unwilling or unable to ensure that these rules are upheld, and as such is therefore clearly an unsuitable person for this role.

I look forward to hearing from you. I wish to attend the Review Meeting on June 11th.

Yours sincerely

References

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

[2] Chester Live: 'Chester Platinum Lounge lap dancing club waits for licensing decision' July 18th 2015 <https://www.cheshire-live.co.uk/news/chester-cheshire-news/chester-platinum-lounge-lap-dancing-9610810>

WITNESS STATEMENT D: She sat on my [redacted] facing away from me, gyrating her buttocks into my genitals and, reaching forwards, grabbed and massaged my testicles. She said that I had nice balls and that she "loved balls and loved dick and squeezing balls".

WITNESS STATEMENT E: She straddled me whilst facing me, pushing her genitals towards my thigh and crotch area

RULE 1: Dancers must not put their feet on the booth seat

RULE 2: Dancers may only touch customers above their chest and only with hands

WITNESS STATEMENT F: One dancer licked the other's breasts and vagina

RULE 3: Dancers must not sit on or straddle punters

WITNESS STATEMENT G: She knelt in front of me and gently bit my penis through my trousers, rubbed my genitals with her hand saying she loved 'old dick'

RULE 4: Dancers are never to intentionally touch another dancer's breasts or genitals

RULE 8: Dancers may not touch their breasts with their mouths, lips or tongues

WITNESS STATEMENT B: She said "oh grandad give me some dick now"

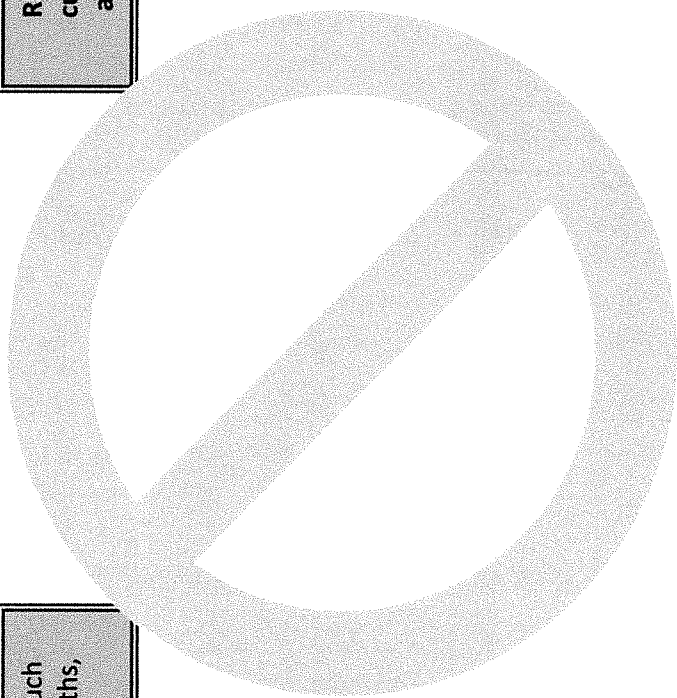
RULE 7: Dancers are never to engage in communication that suggests prostitution

WITNESS STATEMENT A: She placed her mouth around the area of my genitals again, using pressure and simulating oral sex

RULE 5: Dancers must keep one foot on the floor at all times

WITNESS STATEMENT H: She placed her right foot on the bench next to me, repeatedly rubbed my genitals with her hand and pushed her nipples against my mouth

RULE 6: Dancers may not use any sexual, graphic language



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

O327

From:
Sent: 27 May 2019 23:09
To: licensingservice
Subject: Objection to re-licensing Spearmint Rhino.

Hello,

FAO Sheffield licensing team.

Objection to re-licensing Spearmint Rhino.

Please accept this email as an objection to the current license renewal application of Spearmint Rhino. There are many reasons to this objection, including gender equality, female objectification and damaging image in arrival to the city. This is in addition to the information about the trading that occurs, previously exposed via an undercover investigation and made public.

You are welcome to email me for further details.

Get [Outlook for Android](#)

Rhodes-Evans Emma (CEX)

Subject: FW: SPEARMINT RHINO
Attachments: SR template objection letter 2019.docx

O328 P1

From:
Sent: 27 May 2019 23:36
To: licensingservice
Subject: SPEARMINT RHINO

Dear Licensing Service

I wish to object to the granting of a licence to Spearmint Rhino and attach my objection letter.



Licensing Service

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

By email to: licensing@sheffield.gov.uk

27 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.

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 18th 2015 <https://www.cheshire-live.co.uk/news/chester-cheshire-news/chester-platinum-lounge-lap-dancing-9610810>

Rhodes-Evans Emma (CEX)

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

O329

From:
Sent: 24 May 2019 15:08
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.

Yours sincerely,

Sent from my iPhone

11:37am

0330

Objection to re - licensing of Spearmint Rhino 2019 ZERO OPTION

Name [REDACTED]

Address [REDACTED]

Date 18/5/19

To Licensing Service, Sheffield

Dear Madam /Sir

I am writing to object to the relicensing of Spearmint Rhino because strip / lap clubs are outdated, harmful and promote inequality between women and men. Spearmint Rhino has no place in this city and its current location is particularly problematic.

This council has already been subject to two judicial reviews about its failure to comply with its Public Sector Equality Duty and consider the effects on all women of licensing strip clubs.

Strip clubs promote a message that is acceptable to buy women's bodies for sexual gratification thus treating women as objects. This at a time of increased awareness about the impact of such ideas on both women's sense of safety and their actual safety, and no evidence that violence against women/street harassment of women is decreasing. In licensing Spearmint Rhino SCC gives a very confusing message about its commitment to women's safety /equality.

Women have a right to employment which is safe, not exploitative nor psychologically harmful. There is information about the impact of working in such establishments, including from women who have exited. Information about sexual harassment of women in clubs by users and even staff suggests that it is rife. Working conditions for women are very different to those of male security and other staff.

I am also aware of information from local publicity/campaigns which seem to indicate that in a number of such establishments, including Spearmint Rhino Sheffield, there have been significant breaches of rules which have not been picked up by the councils own inspections. This suggests that regulation of an inherently unsafe and unfair working environment is an illusion.

In these circumstances I can see no reason for Spearmint Rhino to retain its licence. As the law permits Councils to decide that there will be no strip and lap dancing clubs in the City, I would like the licensing hearing to refuse the licence, invest in support services for women who may be impacted and divert the cities assets more wisely.

I have have not objected before.

Signature [REDACTED]

LICENSING

28 MAY 2019

11:37am

0331

Objection to re - licensing of Spearmint Rhino 2019 ZERO OPTION

Name

[REDACTED]

Address

[REDACTED]

Date

18-05-2019.

To Licensing Service, Sheffield

Dear Madam /Sir

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In these circumstances I can see no reason for Spearmint Rhino to retain it's licence. As the law permits Councils to decides that there will be no strip and lap dancing clubs in the City, I would like the licensing hearing to refuse the licence, invest in support services for women who may be impacted and divert the cities assets more wisely.

~~I have~~ / have not objected before.

Signature

[REDACTED]

LICENSING

28 MAY 2019

11.37am

0332

Objection to re - licensing of Spearmint Rhino 2019 ZERO OPTION

Name

Address

Date

18/5/19

To Licensing Service, Sheffield

Dear Madam /Sir

I am writing to object to the relicensing of Spearmint Rhino because strip / lap clubs are outdated, harmful and promote inequality between women and men. Spearmint Rhino has no place in this city and its current location is particularly problematic.

This council has already been subject to two judicial reviews about its failure to comply with its Public Sector Equality Duty and consider the effects on all women of licensing strip clubs.

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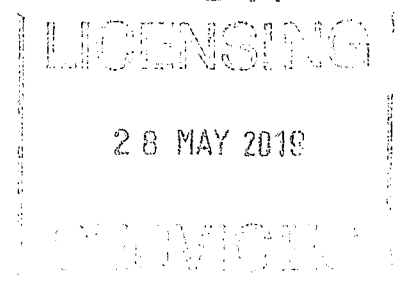
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In these circumstances I can see no reason for Spearmint Rhino to retain its licence. As the law permits Councils to decide that there will be no strip and lap dancing clubs in the City, I would like the licensing hearing to refuse the licence, invest in support services for women who may be impacted and divert the city's assets more wisely.

I have ~~have not~~ objected before.

Signature



11.37am

0322

Objection to re - licensing of Spearmint Rhino 2019 ZERO OPTION

Name [REDACTED]

Address [REDACTED]

Date 18/5/2019 .

To Licensing Service, Sheffield

Dear Madam /Sir

I am writing to object to the relicensing of Spearmint Rhino because strip / lap clubs are outdated, harmful and promote inequality between women and men. Spearmint Rhino has no place in this city and its current location is particularly problematic.

This council has already been subject to two judicial reviews about its failure to comply with its Public Sector Equality Duty and consider the effects on all women of licensing strip clubs.

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In these circumstances I can see no reason for Spearmint Rhino to retain it's licence. As the law permits Councils to decides that there will be no strip and lap dancing clubs in the City, I would like the licensing hearing to refuse the licence, invest in support services for women who may be impacted and divert the cities assets more wisely.

I have / have not objected before.

Signature [REDACTED]

LICENSING
28 MAY 2019

11:37am

0334

Objection to re - licensing of Spearmint Rhino 2019 ZERO OPTION

Name [REDACTED]

Address [REDACTED]

Date 18.5.2019

To Licensing Service, Sheffield

Dear Madam /Sir

I am writing to object to the relicensing of Spearmint Rhino because strip / lap clubs are outdated, harmful and promote inequality between women and men. Spearmint Rhino has no place in this city and its current location is particularly problematic.

This council has already been subject to two judicial reviews about its failure to comply with its Public Sector Equality Duty and consider the effects on all women of licensing strip clubs.

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I have have not objected before.

Signature [REDACTED]

LICENSING

28 MAY 2019

11:37am

0225

Objection to re - licensing of Spearmint Rhino 2019 ZERO OPTION

Name [redacted]
Address [redacted]

Date 18/5/5

To Licensing Service, Sheffield

Dear Madam /Sir

I am writing to object to the relicensing of Spearmint Rhino because strip / lap clubs are outdated, harmful and promote inequality between women and men. Spearmint Rhino has no place in this city and its current location is particularly problematic.

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I have have not objected before.

Signature [redacted]

LICENSING
26 MAY 2015

11:37am

0336

Objection to re - licensing of Spearmint Rhino 2019 ZERO OPTION

Name [REDACTED]

Address [REDACTED]

Date 18 MAY 2019

To Licensing Service, Sheffield

Dear Madam /Sir

I am writing to object to the relicensing of Spearmint Rhino because strip / lap clubs are outdated, harmful and promote inequality between women and men. Spearmint Rhino has no place in this city and its current location is particularly problematic.

This council has already been subject to two judicial reviews about its failure to comply with its Public Sector Equality Duty and consider the effects on all women of licensing strip clubs.

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Women have a right to employment which is safe, not exploitative nor psychologically harmful. There is information about the impact of working in such establishments, including from women who have exited. Information about sexual harassment of women in clubs by users and even staff suggests that it is rife. Working conditions for women are very different to those of male security and other staff.

I am also aware of information from local publicity/campaigns which seem to indicate that in a number of such establishments, including Spearmint Rhino Sheffield, there have been significant breaches of rules which have not been picked up by the councils own inspections. This suggests that regulation of an inherently unsafe and unfair working environment is an illusion.

In these circumstances I can see no reason for Spearmint Rhino to retain it's licence. As the law permits Councils to decides that there will be no strip and lap dancing clubs in the City, I would like the licensing hearing to refuse the licence, invest in support services for women who may be impacted and divert the cities assets more wisely.

~~I have~~ / have not objected before.

Signature [REDACTED]

LICENSING
28 MAY 2019
CITY OF SHEFFIELD

11. J7an

0337

Objection to re - licensing of Spearmint Rhino 2019 ZERO OPTION

Name

Address

Date

18/05/19.

To Licensing Service, Sheffield

Dear Madam /Sir

I am writing to object to the relicensing of Spearmint Rhino because strip / lap clubs are outdated, harmful and promote inequality between women and men. Spearmint Rhino has no place in this city and its current location is particularly problematic.

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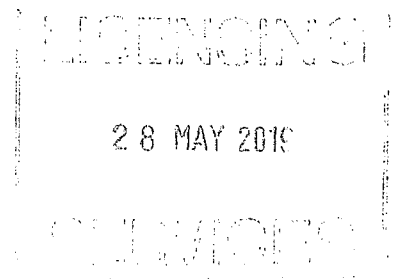
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I have / have not objected before.

Signature

[Redacted Signature]



11:37av

0328

Objection to re - licensing of Spearmint Rhino 2019 ZERO OPTION

Name [redacted]

Address [redacted]

Date 18/05/2019

To Licensing Service, Sheffield

Dear Madam /Sir

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Signature

[redacted signature]

LICENSING
28 MAY 2019

11:37am

0339

Objection to re - licensing of Spearmint Rhino 2019 ZERO OPTION

Name [REDACTED]

Address [REDACTED]

Date 18/05/2019

To Licensing Service, Sheffield

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I have / have not objected before.

Signature

[REDACTED SIGNATURE]

LICENSING
28 MAY 2019
SHEFFIELD

11:37am

0240

Objection to re - licensing of Spearmint Rhino 2019 ZERO OPTION

Name [REDACTED]
Address [REDACTED]

Date 18.05.2019

To Licensing Service, Sheffield

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