

Cheltenham Borough Council Licensing Sub-Committee - Miscellaneous

Meeting date: 6 November 2024

Meeting time: 6.00 pm

Meeting venue: Council Chamber - Municipal Offices

Membership:

Councillor Angie Boyes, Councillor Dr Helen Pemberton, Councillor Julie Sankey, Councillor Simon Wheeler and Councillor Dr David Willingham

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Speaking at Licensing Committee

To find out more about Licensing Committee or to register to speak, please click [here](#) or contact Democratic Services.

Please note: the deadline to register to speak is 5.00pm on the day before the meeting.

Contact: democraticservices@cheltenham.gov.uk

Phone: 01242 264 130

Agenda

1 Apologies

2 Declarations of Interest

3 BRIEFING NOTES (Pages 5 - 8)

Copy of the letter that the Chair of the committee has sent to the Secretary of State. As yet no response has been received.

4 Application for a Renewal of a Sexual Entertainment Venue Licence (Pages 9 - 116)

5 Local Government Act 1972

That in accordance with Section 100A(4) Local Government Act 1972 the public be excluded from the meeting for the remaining agenda items as it is likely that, in view of the nature of the business to be transacted or the nature of the proceedings, if members of the public are present there will be disclosed to them exempt information as defined in paragraph 1 and 2, Part (1) Schedule (12A) Local Government Act 1972, namely:

Paragraph 1; Information relating to any individual

Paragraph 2; Information which is likely to reveal the identity of an individual

6 Review of Hackney Carriage Drivers Licence (Pages 117 - 134)

7 Review of Hackney Carriage Drivers Licence (Pages 135 - 156)

8 Any Other Items the Chairman Determines Urgent and Which Requires a Decision

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CHELTENHAM BOROUGH COUNCIL

COUNCILLOR DR DAVID WILLINGHAM

The Rt Hon Yvette Cooper MP
Secretary of State for the Home
Department
2 Marsham Street
London
SW1P 4DF

Date: 3rd October 2024

Dear Secretary of State,

Ref: 2024-10-03 LGMPA1982 SEV

I am writing to you in my capacity as Chair of Cheltenham Borough Council's Licensing Committee and at the request of that committee, to enquire whether the new Labour Government intends to take a different attitude to sex establishment licensing to the previous Conservative Government, and to review or amend the provisions in Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982 (LGMPA82) as amended by the Police & Crime Act 2009, regulating the licensing of sex establishments.

Our inquiry relates to Sexual Entertainment Venue (SEV) licensing, and more specifically to the "exemption" introduced by the Policing and Crime Act 2009, at section (2A)(3)(b) of Sch. 3 LGMPA82. The effect of which is providing the three conditions in the legislation are complied with by the operator, infrequent relevant entertainment does not require a licence and thus cannot be regulated by the Licensing Authority.

As a town of approximately 120,000 residents, Cheltenham does not seem to have a sufficiently large population to make a permanently licensed SEV premises financially viable. However, during horse racing events, especially March Gold Cup week at Cheltenham Racecourse, the population of the town increases to the point where the demand for the provision of SEV makes it financially viable.

As you can imagine there are a range of views from those who vehemently object to SEV to those who fully support it. As the Licensing Authority, the council cannot take a moral view on SEV¹ and must consider grounds for refusal set out in statute, in the Council's SEV Licensing Policy, in overarching legislation such as the Equality Act 2010, and in relevant case law.

¹ R. v. Newcastle City Council: *ex parte* The Christian Institute [2001] LGR 165

An operator wishing to provide SEV at a single premises for the complete duration of racing events can do so by applying for an SEV licence. This is usually done for premises already operating in the nighttime economy and holding a licence issued under the Licensing Act 2003 (LA2003). If an SEV licence is granted by the Licensing Authority, it can then have enforceable conditions attached to it.

However, the presence in law of the "exemption" has led to the creation of exploitable loopholes. The short duration of racing events and the gaps between events means if the SEV licence is refused or if an operator does not wish to go through the application process, they can use a different premises each night, and the exemption means not only do they not need to apply for a SEV licence, but there are no licensing conditions regulating the activity beyond any on the LA2003 licence. There are further, more convoluted ways to find premises. These could use the Temporary Event Notice process to facilitate LA2003 activities such as sale of alcohol and then also use the exemption in the LGMPA82.

Cheltenham's Member of Parliament, Mr Max Wilkinson MP, recently asked a written parliamentary question² on this matter, but regrettably, the inadequate written answer from Dame Diana Johnson MP, suggests she has completely failed to understand the legal issues associated with the "exemption" or how they affect Cheltenham.

In the current legislative climate, it is the council's belief that the ability to add enforceable conditions to a SEV licence makes licensing more desirable than use of the "exemption", as the ability to add conditions is preferable for the safety of performers, customers and the public.

The nature of SEV provided during Race Week fits the stereotype that many have when SEV is mentioned - a female performer for a male audience. This understandably leads to concerns being expressed about issues such as modern slavery, coercive control, and violence against women and girls. Licensing conditions such as the requirement for performers to produce original, valid, government-issued, photographic ID documents and premises inspections by the Council's Licensing Enforcement and Gloucestershire Constabulary's Licensing Team, provide some mitigation of these risks.

However, even in a town the size of Cheltenham, the use of the "exemption" is not just by female performers for a male audience. The "exemption" is used at events with male performers for a female audience and has also been used by Pride in Gloucestershire for LGBTQ+ events, and these have not generated any complaints about either the provision of SEV or the use of the "exemption".

The overarching provisions of the Equality Act 2010 mean that SEV legislation should apply equally regardless of the sex of the performer or the sexual preference of the audience. This means our request to the Government would be to agree to review the legislation. Possible improvements that could be considered would include a set of mandatory minimum safeguarding conditions regulating the provision of all relevant entertainment even if it is provided via the "exemption", and a restriction on operators preventing them from using different premises in the same licensing authority area on consecutive nights without an SEV licence. However, I suspect licensing professionals in the Institute of Licensing may wish to see a more thorough review of sex establishment licensing with a much wider remit, for example

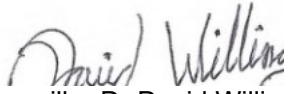
² Max Wilkinson MP, Sex establishments: Licensing, UIN 3850, tabled on 2 September 2024, <https://questions-statements.parliament.uk/written-questions/detail/2024-09-02/3850>

considering premises in large conurbations such as London, Birmingham and Manchester that cater to particular sub-cultures and a public-safety based approach to licensing sex positive venues³.

Should your government decide to review the legislation relating to sex establishment licensing, then representatives from Cheltenham Borough Council would be very happy to provide evidence and testimony into any Home Office research or Parliamentary committees.

When I wrote to the Home Office about this issue in July 2020, the previous Conservative government declined to take any action to look at the effect of the "exemption", and in her reply⁴, then minister Victoria Atkins MP cited "*the reduction of onerous regulation being placed on small businesses*" as the reason for refusing to act. Given councils' regulation and licensing of sex establishments must be done in compliance with statute and case law, I am hopeful that a new government will take a different approach and at least consider reviewing this legislation, so I would be grateful if you could clarify the new Labour Government's position on sex establishment licensing and I look forward to your reply.

Yours sincerely



Councillor Dr David Willingham

Cc:

Cllr Angie Boyes (Vice Chair of Licensing Committee)
Cllr Victoria Atherstone (Cabinet Member for Regulatory Services)
Mr Max Wilkinson MP (Cheltenham Constituency)
Mr Cameron Thomas MP (Tewkesbury Constituency)
Licensing Committee
Gloucestershire LDRS

³ Leo Charalambides & Charles Holland, "No sex discussions please, we're British", Journal of Licensing, Iss. 30, July 2020, <https://www.instituteoflicensing.org/media/w2x15fku/jol-30-web-version.pdf>

⁴ Letter HOCS Reference: MIN 12782/20 VA, dated 21 September 2020.

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"Miscellaneous" Licensing Sub-committee – 7 November 2024

Local Government (Miscellaneous Provisions) Act 1982

Application for a Renewal of a Sexual Entertainment Venue Licence

Red Apple Associates Ltd.

Report of the Head of Public Protection

1. Summary and recommendation

- 1.1 Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982 (“the Act”), as amended by section 27 of the Policing and Crime Act 2009, allows applicants to apply for, renew, vary and/or transfer a Sexual Entertainment Venue (“SEV”) licence where they wish to offer “relevant entertainment on a frequent basis.
- 1.2 In this case an application for the renewal of a SEV licence was submitted on 9 September 2024 in respect of 30 Cambray Place, Cheltenham, GL50 1JP.
- 1.3 The renewal application is to authorise the premises to provide relevant entertainment on the following dates and times:
 - 1.3.1 October The Showcase Friday 8pm to 5am the day following
The Showcase Saturday 8pm to 5am the day following
 - 1.3.2 November The November meeting – Friday 8pm to 5am the day following
The November meeting – Saturday 8pm to 5am the day following
 - 1.3.3 December The Christmas meeting Friday 8pm to 5am the day following
The Christmas meeting Saturday 8pm to 5am the day following
 - 1.3.4 January The New Years Day meeting 1st January each year 8pm to 5am the day following
Festive Trials Saturday 8pm to 5am the day following
 - 1.3.5 March Cheltenham Festival Monday 8pm to 5am the day following
Cheltenham Festival Tuesday 6pm to 5am the day following
Cheltenham Festival Wednesday 6pm to 5am the day following
Cheltenham Festival Thursday 6pm to 5am the day following
Cheltenham Festival Friday 6pm to 5am the day following
Cheltenham Festival Saturday 8pm to 5am the day following

- 1.3.6 April April meeting Wednesday 8pm to 5am the day following
April meeting Thursday 8pm to 5am the day following
- 1.3.7 May Hunters Showcase Friday 8pm to 5am the day following

1.4 In addition, the applicants have also applied to vary a number of standard licensing conditions. These conditions to be varied are:

Standard Condition 6 to be varied to read as follows:

There shall not be displayed outside the premises, in the immediate vicinity, or elsewhere within the Town any advertisements that indicate or suggest that any form of Relevant Entertainment takes place on the premises. This includes the display of any advertisement, word, letter, model, sign, light, placard, board, notice, device, representation, drawing, writing or any matter or thing (where illuminated or not) by means of externally displayed advertisement (such as on billboards or posters) within the councils administrative area.

- 1. The Applicant is allowed to solicit individuals to attend the premises during the hours the licence is in operation, provided that no solicitation takes place to anyone who appears to be under the age of 25.
- 2. The Applicant is allowed to operate a courtesy vehicle to transport dancers and clientele to and from the venue at all times. Further to be allowed to advertise, including by way of leaflets, the courtesy vehicle at all times during the permitted licence hours. No music will be played that can be heard from outside the vehicle. The use of the name 'Eroticats' is permitted

Rationale explained in the application: The reason for the disapplication of this condition is permit a vehicle to transport clientele to and from the venue at all times and for staff to be permitted to give out leaflets for the courtesy bus in the Town.

Standard Condition 25 to be varied to read as follows:

Any movement that indicates sexual activity or simulated sex between entertainers or performers is strictly forbidden.

“Special Condition” to be varied to read as follows:

Banners promoting 'Eroticats' on the exterior of the building must be removed no later than 1 hour after closing and shall not be erected earlier than 1 hours before opening each evening.

- 1.5 A copy of the application form along with other supporting documents are attached at **appendix A** including the premises layout and a location map.
- 1.6 A copy of the premise’s existing SEV licence is attached at **Appendix B**.

1.6 Implications

Legal

Any applicant who is refused a licence may, within 21 days of being notified of the refusal, appeal to the local magistrates' court.

However, the right to appeal does not apply where the licence was refused on the grounds that:

- the number of sexual entertainment venues in the area exceeds the number which the authority considers is appropriate
- the grant of the licence would be inappropriate considering the character of the area, the nature of other premises in the area, or the premises themselves

Contact officer: One Legal
E-mail: legalservices@onelegal.org.uk
Tel no: 01684 272015

2. Background

- 2.1 On 1 October 2014, Council approved the adoption of the amended provision of Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982 to take effect in the borough on 1 December 2010.
- 2.2 Since the adoption, any premises that want to offer "relevant entertainment" on a frequent basis can only do so by obtaining a SEV licence.
- 2.3 Relevant entertainment is defined as any live performance or any live display of nudity which is of such a nature that, ignoring financial gain, it must reasonably be assumed to be provided solely or principally for the purpose of sexually stimulating any member of the audience (whether by verbal or other means).
- 2.4 Under the Act premises can provide relevant entertainment on an infrequent basis without the need for a SEV licence. An infrequent basis is defined under the Act as no relevant entertainment has been provided on more than 11 occasions within a 12 month period and no such occasion has begun within a period of one month beginning with the end of the previous occasion, and no such occasion has lasted longer than 24 hours. Any premises wishing to offer relevant entertainment more frequently are required to apply for a SEV licence.

3. Consultation

- 3.1 An applicant for a Sex Establishment Licence must give notice of their application in accordance with the requirements set out in schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982. The advertising requirements are:
 - 3.1.1 Publishing an advertisement in a local newspaper circulating in the appropriate authority's area, not be later than 7 days after the date of the application; and
 - 3.1.2 Where the application is in respect of premises, notice of it shall in addition be displayed for 21 days beginning with the date of the application on or near the premises and in a place where the notice can conveniently be read by the public.
- 3.2 Schedule 3, paragraph 10(15) of the Local Government (Miscellaneous Provisions) Act 1982 states:

"Any person objecting to an application for the grant, renewal or transfer of a licence under this Schedule shall give notice in writing of his objection to the appropriate authority, stating in general terms the grounds of the objection, **not later than 28 days after the date of the application.**"

[Emphasis Added]

- 3.3 The applicant has advertised the application in accordance with the statutory requirements set out above.
- 3.4 In determining the application, Members must have due regard to any observations made by the Chief Officer of the Police and any other comments made by anybody else.
- 3.5 Members are to note in particular that any objection must relate to both or either of the mandatory or discretionary grounds for refusal set out below.
- 3.6 Objections made on moral grounds or values are not relevant to either the mandatory or discretionary grounds for refusal and should therefore not be considered relevant.

Consultation – Chief Officer of Police

- 3.7 The Chief Officer of Police did not raise any objections in relation to this application.

Consultation – Other Persons

- 3.8 In relation to this application the licensing authority received 74 objections and 40 representations in support of the application from residents and others during the statutory consultation period. Copies of these are outlined in **Appendix B**.
- 3.9 A number of consultees submitted similarly worded representations, both in objection and support. These similarly worded representations are listed only once in the attachment at **Appendix C**.

4. Policy Considerations

- 4.1 The authority's adopted policy statement in relation to the regulation and control of SEVs was adopted by Full Council on 29 July 2020, and this policy statement sets out the authority's guidance, application procedure, terms and conditions relating to the regulation of SEVs.
- 4.2 Below (para. 4.4 – 4.15) are relevant extracts from the policy to highlight relevant issues to Members. However, Members should read these in conjunction with the policy document for completeness and contextual understanding.
- 4.3 As a regulatory matter, the authority does not take any moral stand in adopting this policy. The authority recognises that Parliament has made it lawful to operate a sex establishment and that such businesses are a legitimate part of the retail and leisure industries. It is this authority's role as the licensing authority to administer the licensing regime in accordance with the law.

Determination (Section 11)

Mandatory Grounds for Refusal

- 4.4 A licence cannot be granted:
 - a) to any person under the age of 18 years;
 - b) to any person who is for the time being disqualified due to the person having had a previous licence revoked in the area of the appropriate authority within the last 12 months;
 - c) to any person, other than a body corporate, who is not resident in an EEA State or was not so resident throughout the period of six months immediately preceding the date when the application made;
 - d) to a body corporate which is not incorporated in an EEA State; or

- e) to any person who has, within a period of 12 months immediately preceding the date when the application was made, been refused that grant or renewal of a licence for the premises, vehicle, vessel or stall in respect of which the application is made, unless the refusal has been reversed on appeal.

Discretionary Grounds for Refusal

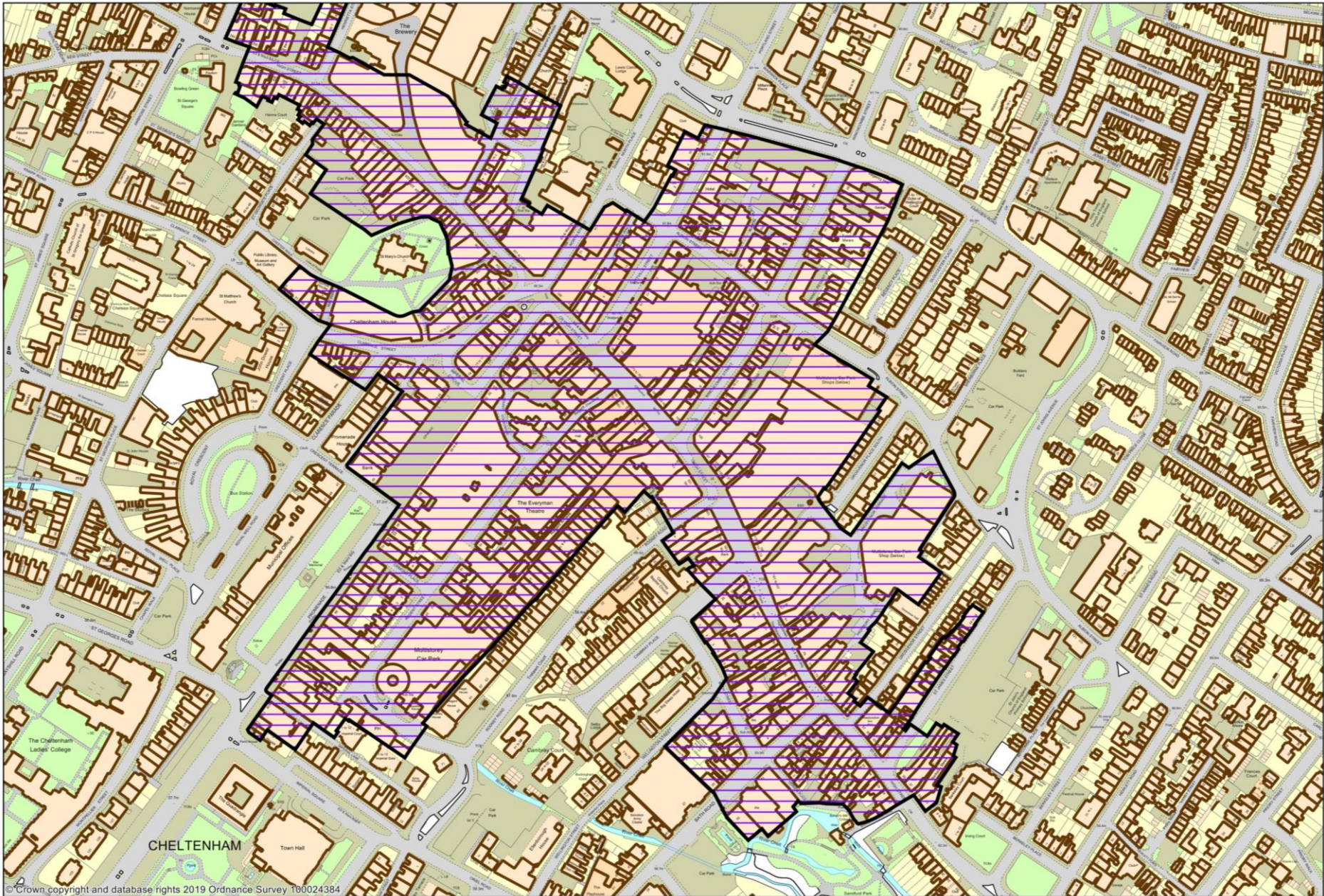
4.5 A licence may be refused where:

- a) the applicant is unsuitable to hold the licence by reason of having been convicted of an offence or for any other reason;
- b) if the licence were to be granted, renewed or transferred the business to which it relates would be managed by or carried on for the benefit of a person, other than the applicant, who would be refused the grant, renewal or transfer of such a licence if he made the application himself;
- c) the number of SEVs in the relevant locality at the time the application is made is equal to or exceeds the number which the Council consider is appropriate for that locality (nil may be an appropriate number for these purposes);
- d) the grant or renewal of the licence would be inappropriate, having regard:
 - 1) to the character of the relevant locality; and/or
 - 2) to the use to which any premises in the vicinity are put; and/or
 - 3) to the layout, character or condition of the premises, vehicle, vessel or stall in respect of which the application is made.

Location of Premises (Section 12)

- 4.6 In deciding the appropriate number of premises to be licensed, the authority must consider the character of the relevant locality and what is the appropriate number of SEVs for the relevant locality. The number can be 'nil'.
- 4.7 Cheltenham is a relatively small urban borough that is predominantly residential in nature. The authority has already resolved that it is inappropriate to licence SEVs in or in the vicinity of, amongst others, residential areas. It is the authority's policy therefore that there is no locality outside of the Designated Permitted Area in which it would be appropriate to license a SEV. Accordingly the appropriate number of SEVs for outside of the Designated Permitted Area is nil.
- 4.8 The authority recognise however that the Designated Permitted Area offers a more varied situation in as much as it has a much wider mix on offer, particularly in the night time economy and it may therefore be appropriate to consider applications for SEVs in the area. The authority has therefore resolved that it will not set a limit on the number of permitted SEVs in the Designated Permitted Area providing those premises are not near properties with sensitive uses or in sensitive locations.

Designated Permitted Area



Properties with sensitive uses or in sensitive areas

- 4.10 In considering if the grant, renewal or variation of the licence would be inappropriate, having regard to the character of the relevant locality or to the use to which any premises in the vicinity are put, the authority shall consider, amongst other things, whether the grant of the application would be appropriate, having regard to:
- a) The fact that the premises are sited in a residential area;
 - b) Whether the premises are sited near shops used by or directed at families or children, or on frontages frequently passed by the same;
 - c) Whether the premises are sited near properties which are sensitive for religious; and/or
 - d) Whether the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families.

Objections (Section 14)

- 4.11 When considering an application for the grant, renewal, variation or transfer of a SEV licence the authority will have regard to any observations submitted to it by the Chief Officer of Police and any objections that have been received from anyone else within the statutory consultation period. Any person can object to an application provided that the objection is relevant to the discretionary grounds for refusal of a licence.
- 4.12 Objections should not be made on moral grounds or values and the authority will not consider objections that are not relevant to the grounds mentioned above.
- 4.13 Objectors must give notice of their objection in writing, stating the general terms of the objection.
- 4.14 Where the authority receives notice of any objection it will, before considering the application, give notice in writing of the general terms of the objection to the applicant. However, the authority shall not without the consent of the person making the objection reveal their name or address to the applicant.
- 4.15 Objections may only be made within the period of 28 days following the date on which the application was made to the authority.

5. National Guidance (March 2010)

- 5.1 The Government has issued non-statutory guidance to aid local authorities carrying out their functions under Schedule 3, as amended by section 27.
- 5.2 Although it is non-statutory guidance, local authorities are encouraged to have regard to the guidance when exercising their functions (although there is no statutory requirement to do so) in order to promote best practice and consistency across England and Wales.
- 5.3 Below (para. 6.4 – 6.14) are relevant extracts from the policy to highlight relevant issued to Members. However, Members should read these in conjunction with the guidance document for completeness and contextual understanding.

Meaning of Sexual Entertainment Venue

- 5.4 Paragraph 2A of Schedule 3 as inserted by section 27 sets out the meaning of a 'sexual entertainment venue' and 'relevant entertainment' for the purposes of these provisions. A sexual entertainment venue is defined as "any premises at which relevant entertainment is provided before a live audience for the financial gain of the organiser or the entertainer." (para 2.1)

5.5 The meaning of ‘relevant entertainment’ is performance or live display of nudity which is of such a nature that, ignoring financial gain, it must reasonably be assumed to be provided solely or principally for the purpose of sexually stimulating any member of an audience (whether by verbal or other means).” An audience can consist of just one person (e.g. where the entertainment takes place in private booths). (para 2.2)

Refusal of a Licence

5.6 When considering an application for the grant, renewal or transfer of a licence the appropriate authority should have regard to any observations submitted to it by the chief officer of police and any objections that they have received from anyone else within 28 days of the application. Any person can object to an application but the objection should be relevant to the grounds set out in paragraph 12 for refusing a licence. Objections should not be based on moral grounds/values and local authorities should not consider objections that are not relevant to the grounds set out in paragraph 12. Objectors must give notice of their objection in writing, stating the general terms of the objection. (para. 3.23)

5.7 When determining a licence application, the local authority must have regard to any rights the applicant may have under Article 10 (right to freedom of expression) and Article 1, Protocol 1 (protection of property) of the European Convention on Human Rights. (para. 3.30)

5.8 The Provision of Services Regulations 2009 amended Schedule 3 to the 1982 Act to state that, if having considered an application for the grant, renewal or transfer of a licence, the appropriate authority decides to refuse it on one or more of the above grounds, it must provide the applicant with reasons for the decision in writing. (para. 3.31)

Relevant Locality

5.9 Paragraph 12(3)(c) and 12(3)(d) of Schedule 3 allow appropriate authorities to refuse applications on grounds related to an assessment of the “relevant locality”. A licence can be refused if either, at the time the application is determined, the number of sex establishments, or sex establishments of a particular kind, in the relevant locality is equal to or exceeds the number that the authority considers appropriate for that locality; or that a sex establishment would be inappropriate having regard to the character of the relevant locality, the use to which any premises in the vicinity are put or the layout, character or condition of the premises. Nil may be the appropriate number. (para. 3.32)

5.10 Schedule 3 to the 1982 Act does not define “relevant locality” further than to say that:

- a. in relation to premises, it is the locality where they are situated; and
- b. in relation to a vehicle, vessel or stall, any locality where it is desired to use it as a sex establishment. (para. 3.33)

5.11 Clearly, the decision regarding what constitutes the ‘relevant locality’ is a matter for the appropriate authority. However, such questions must be decided on the facts of the individual application. (para. 3.34)

5.12 Therefore, it is reasonable and potentially useful to future applicants, for a local authority to decide in advance of receiving any applications that certain areas are, or are not, appropriate locations for a sex establishment or a particular number of sex establishments. Nevertheless, all applications must be considered on their individual merits. (para. 3.35)

Licence Conditions

5.13 Once the appropriate authority has decided to grant a licence they are able to impose terms, conditions and restrictions on that licence, either in the form of conditions specific to the individual licence under paragraph 8 of Schedule 3 or standard conditions applicable to all sex establishments, or particular types of sex establishments, prescribed by regulations made by the appropriate authority under paragraph 13 of Schedule 3. (para. 3.39)

The Services Directive

5.14 Schedule 3 to the 1982 Act constitutes an authorisation scheme under Article 9 of the EU Services Directive 2006/123/EC (“the Directive”) which was implemented in the UK by the Provision of Services Regulations 2009 (“2009 Regulations”), which came into force on 28th December 2009. Local authorities must ensure they comply with the Regulations when applying the licensing provisions in Schedule 3. (para. 3.53)

6. Public Sector Equality Duty (PSED)

6.1 The PSED places a statutory duty on the council, in the exercise of its functions, to have due regard to the need to:

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

6.2 Protected characteristics are:

- a) age
- b) disability
- c) gender reassignment
- d) pregnancy and maternity
- e) race
- f) religion or belief
- g) sex
- h) sexual orientation

6.3 The licensing and regulation of SEVs does fall within the authority’s PSED and therefore the authority must have regard to the matters listed above when, for example, setting policy and issuing licences.

6.4 The licensing and regulation of SEVs often creates a tension between the statutory right to operate such a venue and equality issues relating to discrimination and objectification of primarily women.

6.5 The starting point for the authority is the fact that it cannot take any moral stand in relation SEVs in recognition that Parliament has made it lawful to operate a sex establishment. This starting point however does not mean that the authority is therefore bound by the primary legislation at the expense of other statutory requirements.

6.6 When setting policy or determining individual applications, the authority must have regard to its PSED taking into account the individual merits of each application.

6.7 Equality issues may be relevant to (not exhaustive):

- a) The need to protect performers from harassment and threat;
- b) The need to ensure that any protected characteristic group is not more, or less, welcome than another;
- c) The need to properly consider the fear of any protected characteristic group using and accessing public spaces, facilities and infrastructure;

- d) The need to properly understand the equality and the need to ensure, taking into account the relevant locality, any protected characteristic group's view is taken into account such as those relevant to religion or belief or race;
- e) The need to consider the views and experiences of people with disabilities as a protected characteristic group.

6.8 Some or all of these equality issues may be addressed through appropriate conditions and robust enforcement. Equally, the licensing process may also be an important tool to achieve the same outcome, for example, licence reviews and policy changes.

7. Officer Comments

7.1 This application must be determined on its individual merits taking into account the matters outlined in this report, the relevant statutory provisions, the authority's adopted policy, the relevant guidance issued by the Home Office and any objections or comments made by the Chief Officer of Police and other persons.

7.2 In particular, the committee must bear in mind that its grounds for refusal of this licence application is restricted to those specified under the statutory mandatory and discretionary grounds. For reference these are outlined at paragraphs 4.4 and 4.5 respectively. As such, the relevance of representations made in relation to this application must therefore also relate to either the statutory mandatory and discretionary grounds for refusal.

7.3 The committee is also reminded that the authority does not take any moral stand in relation to operation of sex establishments such as sexual entertainment venues because the authority recognises that Parliament has made it lawful to operate a sex establishment and that such businesses are a legitimate part of the retail and leisure industries. It is this authority's role as the Licensing Authority to administer the licensing regime in accordance with the statutory provisions.

7.4 The committee must also be mindful of its Public Sector Equality Duty under the Equality Act 2010.

7.5 The application is also seeking to vary the standard SEV licensing conditions. The committee must not arbitrarily deviate from its own adopted licensing policy. Where the committee consider there to be exceptional circumstances that may justify a deviation from its licensing policy, this must be thoroughly reasoned and recorded.

7.6 Members should note that this premises falls inside the authority's "Designated Permitted Area" for the licensing of SEVs.

7.5 Having considered all the relevant matters, the committee must decide whether to:

- a) Grant the application as applied for;
- b) Grant the application subject to any additional terms, conditions and/or restrictions that are either specific to the licence or standard conditions; or
- c) Refuse the application.

Cheltenham Borough Council Sexual Entertainment Venue Policy Statement adopted Full Council on 29 July 2020

Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982, as amended by section 27 of the Policing and Crime Act 2009

R (Bean Leisure Trading A Limited) v Leeds City Council and R (Ruby May (1) Ltd) v Leeds City Council [2014] EWHC 878 (Admin)

Thompson v Oxford City Council [2014] EWCA Civ 94

Case Officer

Contact officer: Mr Louis Krog
E-mail: licensing@cheltenham.gov.uk
Tel no: 01242 262626

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LICENCE APPLICATION

NOTE Please read the explanatory notes attached before completing this application form

Local Government (Miscellaneous Provisions) Act 1982 Schedule 3
APPLICATION FOR A SEXUAL ENTERTAINMENT VENUE LICENCE

PLEASE NOTE
All applicants must complete Section A.
Section B to be completed if applicant is a company.
All applicants must sign declaration in Section C.

SECTION A

Application type (please tick ✓)
 New application Renewal of existing licence
 Transfer of licence Variation of licence

If renewal please state existing licence number
23 / 01596 / SEXA

Applicant's details:
Surname

Forename(s)

Address:

Post Code:

Date of birth [dd/mm/yyyy]

National Insurance number

Daytime telephone number

Fax number

Email address

Agent acting on behalf of applicant (eg solicitor) if applicable:

Name of agent:

Address of agent:

POPPRESTON AGED SOLICITORS

37 STONEY STREET

THE LACE MARKET

NOTTINGHAM

Post code NG1 1LS

Daytime telephone number of agent

0115 934 9173

Email address of agent

i.moss@popall.co.uk

Name under which the business is to be known and traded as

EROTICATS

Address of premises for which this application is made

JESSOP HOUSE

30 CAMBRAY PLACE

CHELTENHAM

Post code GL50 1JP

For what purpose do you intend to use this premises?

eg sex shop, sex entertainment venue

SEXUAL ENTERTAINMENT VENUE

Do you have planning consent to use the premises stated above for the purpose intended?

(please provide details, and forward appropriate documentation to evidence this)

If this application relates to a vehicle, vessel or stall please give description (including site to be situated on)

/

Proposed days and hours of operation

(please tick ✓ and specify times for each day using the 24 hour clock) eg: 23:00 that day or 02:00 on the day following

Sunday - from until hours

Monday - from until hours

Tuesday - from until hours

Wednesday - from until hours

Thursday - from until hours

Friday - from until hours

PLEASE SEE ATTACHED SUPPORTING DOCUMENTS

PLEASE SEE ATTACHED SUPPORTING DOCUMENTS

Saturday - from _____ until _____ hours

Have you ever been convicted by a Court for any offence which is not now spent under the terms of the Rehabilitation of Offenders Act 1974?

- Yes
- No

(please tick ✓ as appropriate)

If Yes, please give details
All unspent convictions must be disclosed (if renewal application, since you last applied for a licence)

(please continue on a separate sheet if necessary)

Date of Conviction	Name of Convicting Court	Nature of Offence

Are there any criminal proceedings against you pending?

- Yes
- No

(please tick ✓ as appropriate)

If Yes, please give full details including date of hearing and name of Court

Have you been a director or company secretary of a company involved in the ownership or operation of a sexual entertainment venue licence previously?

- Yes
- No

(please tick ✓ as appropriate)

If yes, please give details

TWO PIES, CHESTERHAM
UNDER THE PROM, CHESTERHAM

Were there any convictions recorded against that company?

- Yes
- No

(please tick ✓ as appropriate)

If yes, please give details

SECTION B

To be completed if the applicant is a company

Company name

RED APPLE ASSOCIATES LTD

Company address

UNIT 3, AMBRASE HOUSE,
METEOR COURT, BARNETT WAY,
BARNWOOD, GLOUCESTER

Post code GL4 3GG

Company telephone number

01654 273 875

Company fax number

Company email address

europa@aptselive.co.uk

Full names and private addresses of all directors or other persons responsible for management of the company:

1	2	3
Name	Name:	Name:
STEVEN JOHN BURNOWS		
Address: [REDACTED]	Address:	Address:
TEUKESBURY		
Post Code: [REDACTED]	Post Code:	Post Code:
Date of birth: [REDACTED]	Date of birth:	Date of birth:
National Insurance no. [REDACTED]	National Insurance no.	National Insurance no.

Any convictions recorded against that person or those persons

Name and date of conviction	Name of convicting Court	Nature of offence	Sentence (if imposed)

Are there any criminal proceedings against that person or those persons pending?

Yes

No

(please tick ✓ as appropriate)

If **Yes**, please give full details including date of hearing and name of Court

SECTION C

Declaration

All new and variation applications for sexual entertainment venue licences are considered by the Licensing Committee. Opposed applications for renewal and/or transfer will also be considered by the Licensing Committee. The applicant and/or their representative are required to attend the meeting of the Licensing Committee at which their application is due to be considered to speak in support of their application. They should be prepared to answer any questions which the Licensing Committee may wish to ask.

PLEASE NOTE

This application must be signed by the applicant personally or, in the case of a company, by a director or other duly authorised agent of the company.

I/We confirm that the contents of this application are true and correct.

I/We agree that if a licence is granted by Cheltenham Borough Council for a sexual entertainment venue licence, that I/we will comply with all Acts, Byelaws, Regulations and Conditions relating thereto and for the time being in force.

I/We understand that non-compliance with any relevant Acts, Byelaws, Regulations and Conditions will prejudice the continuance of any licence granted.

I/We understand that the council may utilise the information contained herein for internal purposes and may disclose the information to persons or organisations in accordance with the council's registration under the Data Protection Act 1998.

I/We, the undersigned, hereby apply for registration as a sexual entertainment venue licence within the Borough of Cheltenham and I/we declare that to the best of my/our knowledge and belief the foregoing statements are true and correct.

I/We understand that this licence will expire 1 year after it has first been granted or after a period of time decreed by the Licensing Committee, and a newly completed application form will need to be submitted to the local authority **two months before the expire of the existing licence, together with the licence fee current at that time.**

I/We further understand that once the completed application form has been submitted it will be submitted to environmental health, planning, building control and community safety officers of Cheltenham Borough Council together with the local police, fire service, parish councils, ward members or any other interested party for comment.

I/We understand that I/we must submit a copy of this application form to the chief officer of police for the area in which the premises are located and all other Responsible Authorities.

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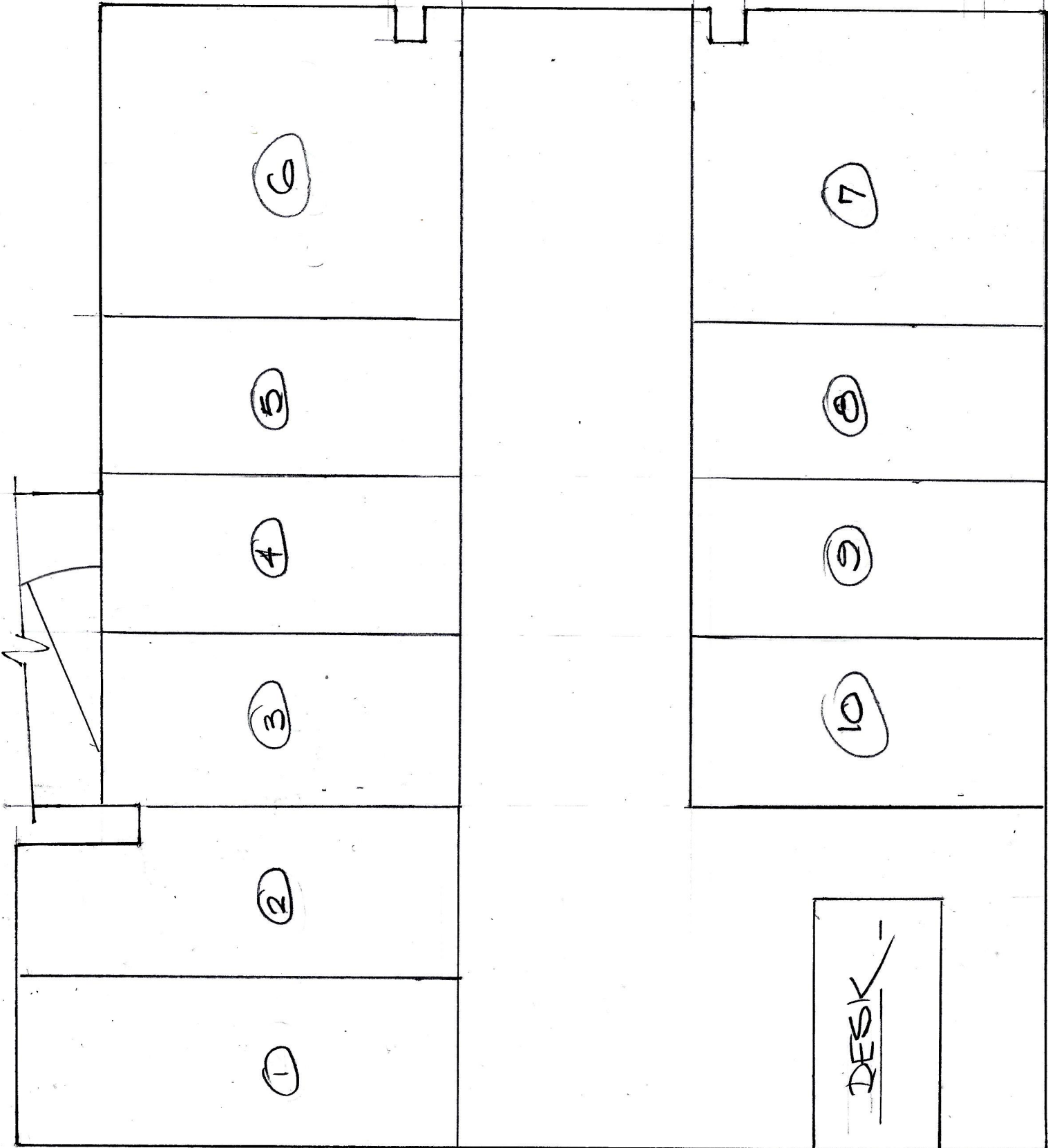
CAMBRAY PLACE

BASEMENT
BOOTH LAYOUT

DRG N° CP 1

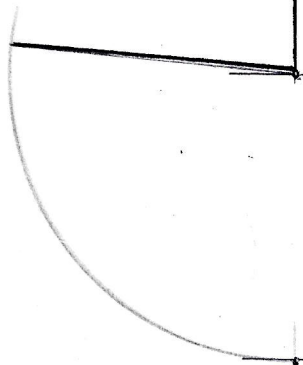
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CAMPBELL PLACE

2ND FLOOR

BOOTH LAYOUT

DRG NO CP 3.

SCALE 1:25 AT A4

20/12/23

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General Management Document

Performers Application

Performers complete an application via a website providing.
No application is accepted on anybody else's behalf.

- Full name
- Date of Birth
- Postal address
- Contact details: Telephone / Email address

All information supported by Photographic I.D -
passport, driving licence which includes prove of address. Once various
checks have been completed, including right to work checks with original
copies of ID to be provided.

Performers receive an email to confirm application has been approved.

Events

Registered performers receive an email regarding up-and
coming event/s offering them the opportunity to request to work
a venue/event.

Only emails with the registered email addresses are considered, all
performers when applying to register agree to update any changes to their
details.

Confirmation on working

If successful on being accepted for an event/venue. An email is sent offering night/s with information Venue, Dates, Times and a copy of the house rules. Which a copy is made available in writing and verbally on checking in. Which is made clear they will be expected to comply with the house rules, if they do not comply with the house rules their contract is terminated

Performers check-in

Checking in, event opens an hour before venue, with SIA security on duty. Performers details are confirmed checked against records and copies of photographic ID taken. They then sign the contract and issued with a unique numbered wristband.

The wristband confirms they are registered to work event, have completed all checks contracts, house rules signed, and ID proof has been provided on check in.

No performer can work without a unique numbered wristband.

Any new performers will receive a guided tour of the venue with an induction on how the system operates from one of the house mothers.

Changing Rooms:

- The changing rooms will have seats and the bag area/ cloakroom is manned at all times and their wrist band number matches the number assigned to their bags so no one else has access to their belongings.

Intoxication procedure;

- If identified, they are escorted to the dressing room by house mum or female member of security who have received intoxication training.
- They then sit with them talking to them whilst providing them with glasses of water and assessing their level of intoxication.
- The performer continues to be monitored until we believe she is in a fit condition to leave the venue.
- Performers then get dressed and we arrange transport for both of them back to their accommodation along with a female member of staff.

Smoking Area:

- A member of door staff is stood at the exit to the garden with dressing gowns and performers are not permitted out unless wearing a dressing gown or suitably covered up.

Transactions

Performers will take the customer to the booth payment reception area, where payment is taken, and which is recorded on video and audio. The receptionist receives payment, by cash or card from the customer directly

- The performer does not any cash payment.
- The performer does not touch the customers card at any time.
- The performer does not touch the PDQ machine or enter the customer's pin.
- All larger than normal payments must be signed off by manager on duty.
- Receptionist will contact duty manager about any concerns regarding unusual customer spending

Approved transactions

- A Chip/token is given to the performer for a cash payment, made by customer
- A voucher/cheque is given to performer for PDQ payment made by customer
- The customer and performer are shown to a numbered booth, the computer timing system sets the time allocated for the performance which is monitored by SIA security staff.

Performances

The booth area is constantly patrolled by booth walkers, the front of the booth curtains are see-through, always giving a clear view. Booth walkers duties include monitoring the timing screen located in the booth area and ensuring the safety of both performers and customers.

At the end of the allotted performance time, the booth walker directs the customer to the exit while performer dresses.

Cashing Up

At the end of the night all the performers must go to the office to cash in the tokens/vouchers received for performances. The girls are not permitted to carry large amounts of cash for their own safety and as such they are paid via cheque over certain limit.

Courtesy bus service

The courtesy bus service allows performers and indeed any member of staff, female or male the opportunity to use this service. Not only at the end of the night leaving the venue but also to the venue.

- To and from train/bus station their hotel, accommodation and safe transportation to and from parked cars.
- Performers are made aware of this service and are always requested by management and all members of staff to make use of this service.

Sign written vehicle/s

- Performers able to identify the vehicle.
- Local authorities and police to identify vehicle
- Taxi drivers to identify this is not an illegal taxi service,

Avoiding any unwanted confrontation from taxi driver and persons trying to get a taxi, all of which has been experienced in the past:

Courtesy bus history

The service has been in operation for over 10years and was created initially for the safety of the performers visiting Cheltenham.

- No available taxis
- Unlicensed taxis operating in and around Cheltenham
- Long waits for a taxi
- Taxis not turning up
- Extortionate prices charged

Customer courtesy bus service

During Cheltenham race festivals this service become more and more popular each year with customers.

- Both visiting the venue and when leaving venue.
- To avoid the antisocial behaviour in and around the town.
- Which more and more women are using.
- This service has been used with great success with returning vulnerable lost and confused persons to the safety of the accommodation or to the police

Promotional Staff in the Town handing out the courtesy bus printed material are briefed at the beginning of the shift on how to behave approach people and to pick up all disregarded printed material.

They are all briefed on how to identify intoxicated people and any vulnerable people that may need assistant. If an individual needs assistance, the promotional staff can phone the promotional manager with the incident which is relayed to the front door of the venue where door staff then inform the police over the radio of the incident.

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Red Apple Associates Limited

Sexual Entertainment Licence.

Red Apple Associates Ltd are applying for the renewal of a Sexual Entertainment Licence at Eroticats, Jessop House, 30 Cambray Place, Cheltenham, GL50 1JP.

Background

Steve John Burrows is the Director of Red Apple Associates Limited who will be responsible for the management of the company and venue.

Steve Burrows has;

- A Degree in Marketing Management.
- A Foundation Degree in Leadership and Management in Late night Entertainment.
- Is a Personal Licence Holder.
- Has 11 Years experience managing nightclubs and being a DPS for Luminar Leisure.
- Has worked in 6 different towns and cities, including Cheltenham.
- Was an Area Manager for No Saints over 10 venues across the UK;
- Has 14 years' experience running Sexual Events in Cheltenham.
- Has held SEV Licences for a number of years with no incidents.
- Has been an active night safe member for Cheltenham for over 13 years.

Policies and Procedures:

Red Apple Associates Limited has developed a number of policies and procedures. Attached are the following documents:

1. General Management Document including images of the following which are referred to within the document:
 - a) Courtesy Bus leaflet examples
 - b) Example of courtesy bus
 - c) Examples of tokens/cheques
 - d) Examples of Wristbands
 - e) Example image of banner on venue.
2. House Rules
3. Customer Rules
4. Refusal Entry Log

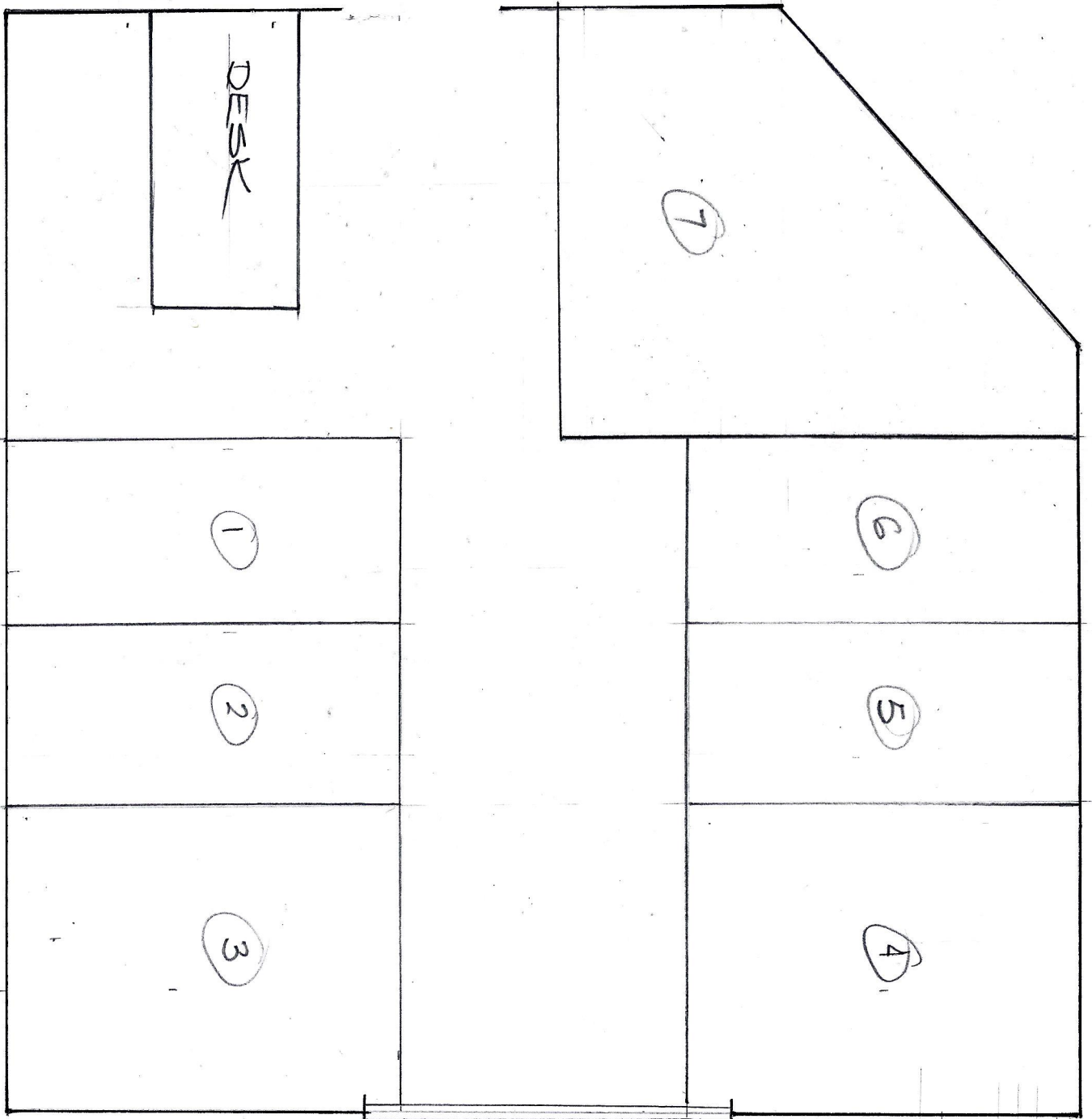
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PLEASE BEHAVE LIKE A GENTLEMAN

- KEEP YOUR HANDS TO YOURSELF
DURING A PERFORMANCE
- REMAIN FULLY DRESSED DURING A PERFORMANCE
- NO PHONES TO BE USED DURING A PERFORMANCE
- NO PHOTOGRAPHY AT ANY TIME
- ALL PAYMENTS MUST BE MADE AT THE CASHIERS
RECEPTION AND EXCHANGED FOR EROTICATS
TOKEN CHIPS

Please show the ladies respect and behave like a gentleman. Any abusive or violent behaviour towards any member of staff will result in you escorted from the venue and police will be called.

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1st FLOOR BOOTH
LAYOUT.

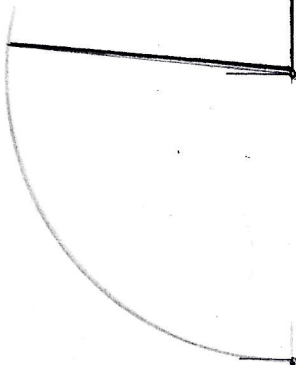
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CAMPBAY PLACE

DRGN° CP2

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CAMPBELL PLACE

2ND FLOOR

BOOTH LAYOUT

DRG NO CP 3.

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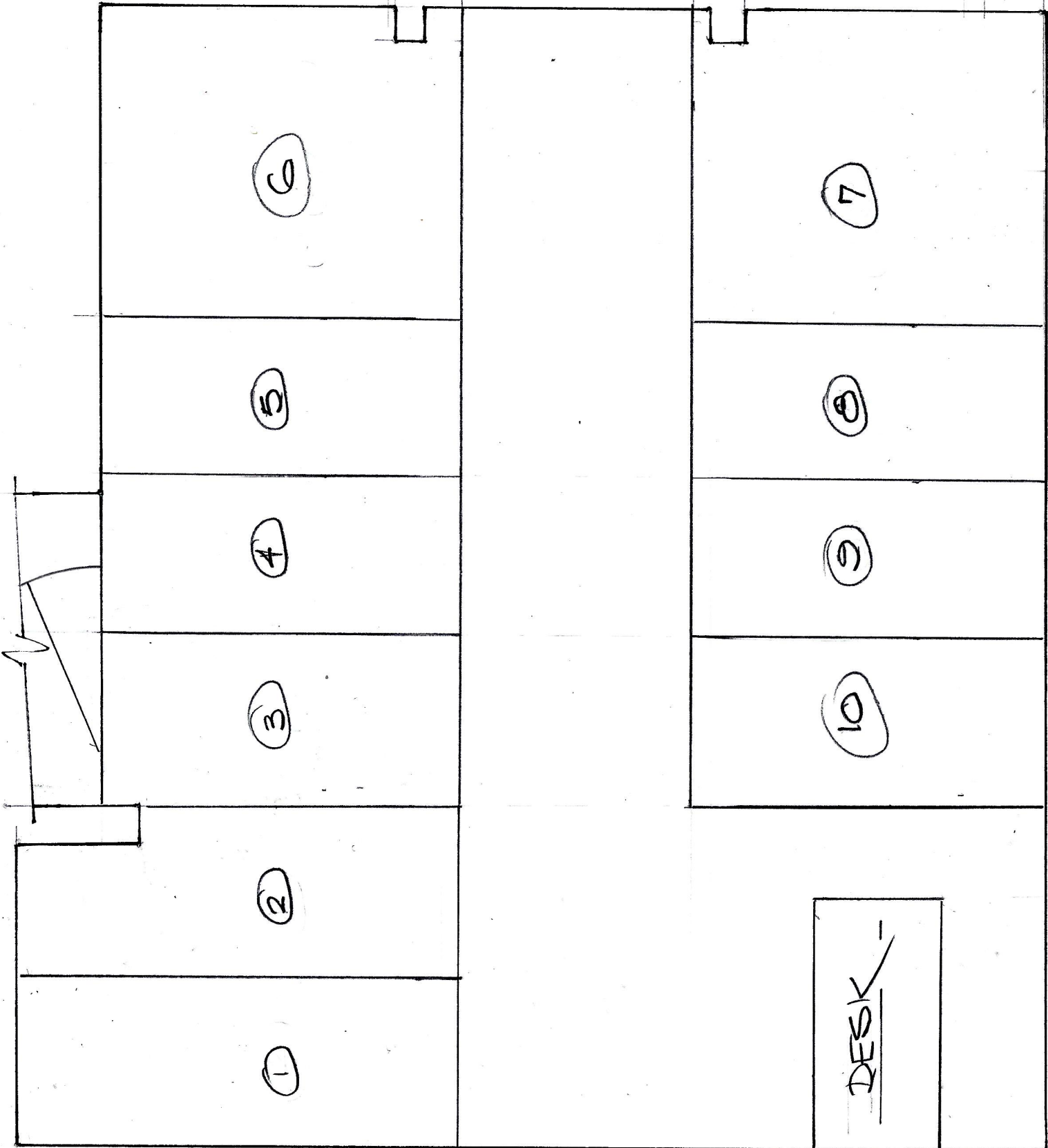
CAMBRAY PLACE

BASEMENT
BOOTH LAYOUT

DRG N° CP 1

20/12/23

SCALE 1:25 AT A4



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NOTES

The accuracy of this drawing cannot be guaranteed and all critical dimensions must be taken on site.

REVISIONS

2022/09 : Banner Sign, Jessop House, 30 Cambray Place, Cheltenham, GL50 1JP

BANNER SIGN

Size 3metre long x 0.6metre high
 Material PVC banner
 Colour Pink background with black lettering
 Position First floor front metal railings centred over entrance door
 Fixings Metal rings on banner and black plastic cable ties to railings

Signage **E**ROTICAT 320mm wide x 420mm high uppercase Cat letter 'E' with 160mm high uppercase
 CLUB 80mm high uppercase
 CHELTENHAM 50mm high uppercase



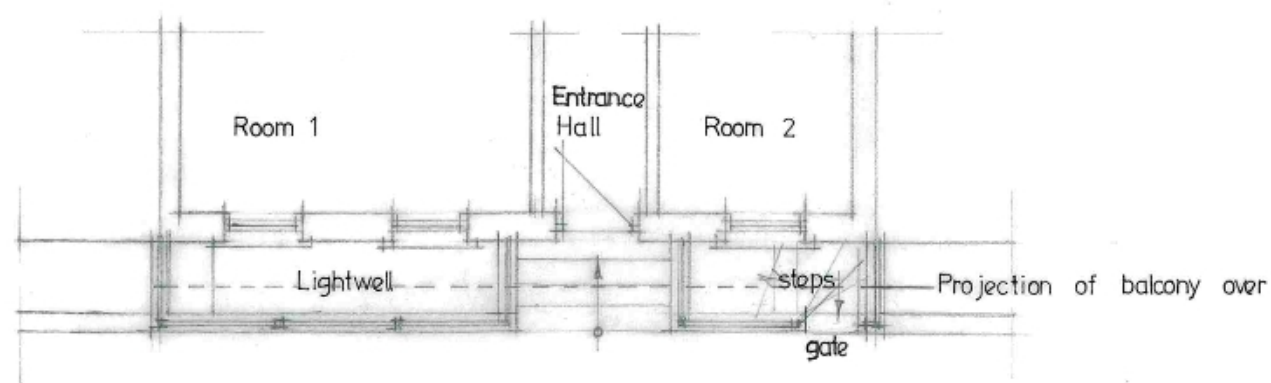
FRONT ELEVATION TO CAMBRAY PLACE
 Scale 1:100 at A3



0.6 metre

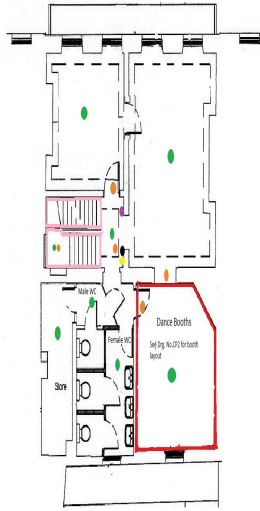
BANNER

3metre



PAVEMENT PLAN TO CAMBRAY PLACE
 Scale 1:100 at A3

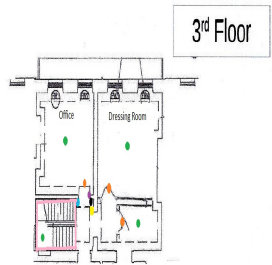
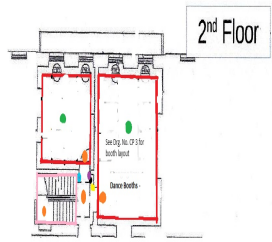
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- Fire Extinguisher Co2 ●
- Fire Extinguisher Foam ●
- Fire Extinguisher Water ●
- Smoke Detector ●
- Emergency Light ●
- Break Glass Call Point ●
- Fire Alarm Sounder ●
- Fire Alarm Panel ■
- Stains ■
- Access and Egress ■
- Area of Performance ■

NO	
NO	30' Control Hose 20000001
NO	
NO	NO Pressure End Point
NO	NO 100
NO	NO 100

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- Fire Extinguisher: CO2 ●
- Fire Extinguisher: Foam ●
- Fire Extinguisher: Water ●
- Smoke Detector ●
- Emergency Light ●
- Break Glass Call Point ●
- Fire Alarm Sounder ●
- Fire Alarm Panel ■
- Stairs ■
- Access and Egress ■
- Area of Performance ■

101	101
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Fire Extinguisher CO2	●
Fire Extinguisher Foam	●
Fire Extinguisher Water	●
Smoke Detector	●
Emergency Light	●
Break Glass Call Point	●
Fire Alarm Sounder	●
Fire Alarm Panel	■
Stairs	—
Access and Egress	—
Area of Performance	—

Notes

1. Anything shown on this plan which is not required by plan regulations is for illustrative purposes only, and does not form part of the Premises Licence.
2. The location and type of any fire safety and any other safety equipment is shown. This may be varied from time to time with the agreement of the fire officer or after a fire risk assessment

NO.	
DATE	
BY	Stewart Ross
FOR	Stewart Ross
SCALE	1:100
DATE	14/03/2010

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CHEL TENHAM

BOROUGH COUNCIL

Local Government (Miscellaneous Provisions) Act 1982 – S.2. And Schedule 3

SEX ESTABLISHMENT LICENCE

Licence Ref No: **23/01596/SEXA**

Cheltenham Borough Council using its powers under the above legislation

HEREBY GRANT LICENCE to **Red Apple Associates Ltd**

to use the premises known as: **Eroticats**
and situate at: **30 Cambray Place**
Cheltenham
GL50 1JP

This licence shall be in force from **5th December 2023 until 4th December 2024**

A fee of **£1614.00** has been paid for the grant of this licence.

Date of issue: **3rd March 2024**

Hours which premises may be open for entertainment:-

Cheltenham Festival in March 2024 - dates 11th, 12th, 13th, 14th, 15th and 16th March 2024 - 6 days only with hours as below

Monday:	Monday 8pm until 5am the day following	Thursday:	Thursday 6pm to 5am the day following
Tuesday:	Tuesday 6pm to 5am the day following	Friday:	Friday 6pm to 5am the day following
Wednesday:	Wednesday 6pm to 5am the day following	Saturday:	Saturday 8pm to 5am the day following

In addition, for the following race events at Cheltenham Racecourse, dates to be confirmed in writing to the Police and Licensing at least 1 month prior to each event:-

October

The Showcase Friday 8pm to 5am the day following

The Showcase Saturday 8pm to 5am the day following

November

The November meeting – Friday 8pm to 5am the day following

The November meeting – Saturday 8pm to 5am the day following



CHELTENHAM

BOROUGH COUNCIL

December

The Christmas meeting Friday 8pm to 5am the day following

The Christmas meeting Saturday 8pm to 5am the day following

January

The New Years Day meeting 1st January each year 8pm to 5am the day following

Festive Trials Saturday 8pm to 5am the day following

April

April Meeting Wednesday 8pm to 5am the day following

April meeting Thursday 8pm to 5am the day following

May

Hunters Showcase Friday 8pm to 5am the day following

THIS Licence is granted subject to the Council's Standard Conditions for Sex Establishment licences and any additional Special Condition(s) set out in the Schedule attached.

A handwritten signature in black ink, appearing to read 'Louis Krog'.

Louis Krog
Head of Public Protection

Second Schedule

STANDARD CONDITIONS REGARDING SEXUAL ENTERTAINMENT VENUES

Variation of Standard Condition 6

The applicant was granted permission to vary standard condition 6 regarding advertisements, solicitations and displays which reads as follows:-

“6. There shall not be displayed outside the premises, in the immediate vicinity, or elsewhere with the Town and advertisements that indicate or suggest that any form of Relevant Entertainment takes place on the premises. This includes the display of any advertisement, word, letter, model, sign, light, placard, board, notice, device, representation, drawing, writing or any matter or thing (where illuminated or not) including any of the following ways;

- a) by means of personal solicitation in the locality of the licensed premises
- b) by means of leafleting in the locality
- c) by means of externally displayed advertisement (such as on billboards or posters) in any parts of the Council’s administrative area
- d) by means of cruising vehicles or use of any other form of solicitation to invite people into the premises.”

The varied condition 6 now reads as follows:-

There shall not be displayed outside the premises, in the immediate vicinity, or elsewhere within the Town any advertisements that indicate or suggest that any form of Relevant Entertainment takes place on the premises. This includes the display of any advertisement, word, letter, model, sign, light, placard, board, notice, device, representation, drawing, writing or any matter or thing (where illuminated or not) by means of externally displayed advertisement (such as on billboards or posters) within the councils administrative area.

1. The Applicant is allowed to solicit individuals to attend the premises during the hours the licence is in operation, provided that no solicitation takes place to anyone who appears to be under the age of 25.
2. The Applicant is allowed to operate a courtesy vehicle to transport dancers and clientele to and from the venue at all times. Further to be allowed to advertise, including by way of leaflets, the courtesy vehicle at all times during the permitted licence hours. No music will be played that can be heard from outside the vehicle. The use of the name ‘Eroticats’ is permitted.

The reason for the disapplication of this condition is permit a vehicle to transport clientele to and from the venue at all times and for staff to be permitted to give out leaflets for the courtesy bus in the Town.

Second Schedule

STANDARD CONDITIONS REGARDING SEXUAL ENTERTAINMENT VENUES

In these conditions:

'Relevant Entertainment' means any live performance or any live display of nudity which is of such a nature that, ignoring financial gain, it must reasonably be assumed to be provided solely or principally for the purpose of sexually stimulating any member of the audience (whether by verbal or other means).

'Authority' means Cheltenham Borough Council.

'Town' means Cheltenham and refers to it in its entirety.

'Premises' means any vessel, vehicle, stall, building, forecourt yard, place of storage or

any part of any of these where Relevant Entertainment takes place and is the subject of a licence.

In the event of a conflict between the prescribed conditions and special conditions contained in a SEV licence the special conditions shall prevail.

General Conditions:

1. The premises shall only permit adult entertainment between the hours detailed in this licence as determined by the licensing committee.
2. Only activities which have previously been agreed in writing by the Authority shall take place.
3. The agreed activities shall take place only in designated areas approved by the Authority.
4. There shall not be displayed outside the premises, in the immediate vicinity, or elsewhere within the Town any advertisements, photographs or images that indicate or suggest that striptease-type dancing takes place on the premises.
5. Rules shall be produced by the licensee for customers indicating conduct that is deemed acceptable. These rules shall be prominently displayed at all tables and at other appropriate locations within the club.

Advertisements, solicitation and displays

See above

Premises

7. Alterations or additions, either internal or external and whether permanent or temporary, to the structures, lighting or layout of the premises as shown on the plan, including any change in the permitted signs on display shall not be made except with the prior approval of the Council.

8. A clear Notice shall be displayed inside the entrance to the premises in the following terms:

9. "Striptease-style entertainment takes place on these premises. No persons under 18 shall be permitted in the premises."

10. The performance must not be visible from the street, and any person who can be observed from the outside of the premises must be properly and decently dressed. Scantily-clad individuals employed in the premises must not exhibit themselves in the entrance or in the vicinity of the premises.

11. When the premises are open for Relevant Entertainment no person under the age of 18 shall be permitted to be on the premises. Anyone appearing to be under the age of 25 years shall be asked to produce valid photographic identification. If this is not produced the individual shall be refused access.

Management and licensee

12. Where the licensee is a body corporate or an unincorporated body any change of director, company secretary or other person responsible for the management of the body is to be notified in writing to the Authority within 14 days of such change.

13. The premises shall maintain a refusals log whereby any occasion a person is refused entry shall be recorded and available upon request by the Police or an authorised officer of the Authority.

Conditions regarding performers

14. Relevant Entertainment may only take place in 'designated areas' that are marked on the plan of the premises.

15. The audience must at all times remain fully-clothed.

16. Performers shall be aged not less than 18 years and the licence holder (or his nominated deputy who is authorised in writing) shall satisfy him/herself that this is the case by requesting valid photographic ID, if necessary, prior to the performance.

17. A 'Signing-in' Register shall be kept at the premises that records the time that the performer starts and finishes at the premises. This shall be made available for immediate inspection by a Police Officer or authorised officers of the Authority.

18. During any performance there must be no physical contact between the performer and any member of the viewing public.

19. No performances shall include any sexual act with other performers.

20. No performances shall include any sexual act with objects.

21. There shall be no nudity by performers in public areas of the premises, unless the Authority has agreed in writing that the area may be used for performances of sexual entertainment.

22. At the completion of the Relevant Entertainment the performers shall dress themselves immediately and leave the designated performance area. Performers not engaged in performing shall not remain in any area in a state of undress.

23. Performers are not to solicit, exchange addresses, telephone numbers or social media contact details with customers, liaise with customers of the premises, or incite customers to purchase alcoholic drinks.

24. An appropriate room shall be set aside to provide a changing and rest area for performers. Access to this room shall be restricted to performers only, whilst the performers are on the premises and shall be marked on the plan of the premises.

25. Any bodily contact between entertainers or performers or any movement that indicates sexual activity or simulated sex between entertainers or performers is strictly forbidden.

26. Entertainers or performers not performing must not be in a licensed area in a state of undress.

27. There shall be prominently and legibly displayed a comprehensive tariff of all charges and prices in respect of relevant entertainment, including any charge for the company of any person working at the premises, which shall be placed in such a position that it can at all times be easily and conveniently read by persons inside the premises.

28. Literature and contact details of organisations that provide advice and counselling on matters relating to:

- (a) Modern slavery,
- (b) Domestic abuse,
- (c) Coercive control,
- (d) Rape and sexual assault,

shall be made available to performers free of charge in their changing area.

Briefing

29. Prior to performers carrying out any activity on the premises, they shall be briefed (verbally or in writing) by the licence holder or his nominated deputy who is authorised in writing as to the conditions that pertain to these particular premises, including the fact that their activities will be recorded on CCTV. The performer(s) shall sign in the Register that they have been briefed.

Door-Supervisors

30. Subject to a minimum of two, SIA-registered door-supervisors shall be employed at a minimum ratio of 1:50 customers on the premises whilst Relevant Entertainment is taking place.

31. The licence holder, or his nominated deputy who is authorised in writing, or Door supervisors, shall carry out regular monitoring of all areas of the premises to which the public have access, and shall intervene promptly, if necessary, to ensure compliance with licence conditions by customers and performers.

32. Door-supervisors shall regularly monitor the area immediately outside the premises for a distance of 30 metres in all directions and shall take steps to deal with (by alerting the Police if appropriate) any unsavoury activity that may be attracted to the vicinity due to the nature of the business.

33. A dedicated SIA-registered door supervisor shall remain at all times in any 'private' performance area where performers are performing nude, and shall intervene promptly, if necessary, to ensure compliance with the Licence conditions.

34. When performers leave the premises they are to be escorted to their cars or taxi by a door- supervisor or member of staff.

CCTV System

35. A digital CCTV system shall be installed and be maintained in good working order, shall record at all times the premises are open, and recordings shall be kept for 14 days.

The CCTV system is to be installed in all areas as recommended by the Police Crime Reduction Officer

36. The CCTV recording device, controls and recordings shall be kept under suitable security to prevent unauthorised access/tampering. Access shall be restricted to the licence holder or his nominated deputy who will be authorised in writing and no more than two designated persons.

37. Unaltered CCTV recordings shall be provided on request (as soon as possible and in any event within 24 hours) to the Police or authorised Officers of the Cheltenham Borough Authority (who will carry identification).

38. No CCTV footage is to be copied, given away or sold (except as required by Police/Authority for investigation/enforcement purposes).

39. Except in accordance with the requirements for CCTV as described above, no photographs, films or video recordings shall be taken of the performances. Nor shall

electronic transmissions of performances take place.

40. Notices shall be displayed informing customers of the presence of CCTV.

Special Condition(s)

1. All signage and banners promoting 'Erotocats' on the exterior of the building must be removed not later than 20 minutes after closing and shall not be erected earlier than 20 minutes before opening each evening.

Plan

Attached.

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My email of support for licenced and regulated lap dancing event during race festivals.

I have worked for Steven and the Eroticats for many years, if I didn't believe it being a safe environment I would not return every March/November in Cheltenham.

I found to be a hard work but very enjoyable. Steven applying a for a lap dancing licence shows a commitment to working with Cheltenham licensing and police creating a regulated and organized safe environments for all.

I know the licensing and police visit all venues during the festival dates which does include the clubs operating under the exemption ruling. With a lot more males performing strip events in Cheltenham under the exemption, would be interesting how many inspections have been made to such events.

Female performers should be treated as male performers, why are men who attend portrayed as sexual pretors and women who attend male strip shows not?

Lap dancing in Cheltenham.

I was informed that Red Apple Associates Ltd application for the SEL renewal for the coming year in partnership with Eroticats.

A sexual entertainment license, 30 Cambray Place Cheltenham Gloucestershire. Would reassure dancers and patrons the knowledge being a properly run lap dance club which is monitored by yourselves and Police.

As a former resident of Cheltenham now living in Yorkshire.

I would like to give you notice to include me in all future SEL applications!

Supporting the SEL application

SEL Licence renewal, Red Apple To whom it may concern, SIA licence holder who works in Cheltenham during March and November festivals, which includes a licensed lap dancing club. I have read many previous objections to lap dancing during the Cheltenham March and November festivals, However in my professional and first-hand personal experience, I have witnessed more incidents of violence anti-social behaviour within normal bars & clubs around Cheltenham in March Gold Cup Week with the police having to attend. On my experience working within the night-club industry would like to support the granting of this licence renewal Regards

Cheltenham licensing Dept Support for Red Apple Associates

As a regular customer at Eroticats during race week, I have found them both superior to any club and a safe place to visit during March, offering a very popular form of entertainment for gentlemen and ladies.

I have booked tickets to see the Dream boys at Cheltenham town hall with my group of friends and would like the same opportunity to visit the Eroticats.

I'm very supportive of this licence application.

Application to host lap dancing nights at Cheltenham 2025 Festivals.

A customer at Eroticats lap dancers in March 2024 after a day of horse day racing. Which I believe was the safest club in town. Where us group of girls avoided the constant harassment of men!

If I can go to the Cheltenham town hall to watch The Forbidden Nights and The Dream Boys at Cheltenham town hall and again in November 2024. Why should I be restricted on watching Eroticats regulated female dancers opposed to the unregulated male dancers.

I do hope you will support the granting of this licence.

I am writing to you this evening to show my support for the application for Eroticats to be operating during the Cheltenham Festivals.

I am a female that has attended the venues, and live locally in Cheltenham and I can say that I feel safe and enjoyed my evenings/nights at Eroticats with a group of my female and male friends. I feel that the venues controlled by Eroticats during the Cheltenham Festival are safer due to the level of staff and security.

Being in a controlled sexual entertainment environment is an improvement to the pop-ups, this is because I feel that the standards of the customers, workers and dancers safety is outstanding.

I have added my address in to the bottom of this email, however I would not like it to be made public.

Please could you take in my application in to consideration.

Email for my support for Eroticats.

I am giving my support for Eroticats to be operating during the Cheltenham Festivals.

My reason for that is that I have been to the venue numerous amount of times and enjoy my evenings at their venues.

Me and my friends look forward to the Cheltenham Festivals including attending Eroticats each year. Eroticats is my preferred venue during Cheltenham Festival because it is a safe environment, the atmosphere is brilliant, and it is mixed for both female and male.

I am writing to you to give my support for the SEV license proposal for Jessop house, 30 cambray place, Cheltenham GL501JP

I have worked for Eroticats for 13 years as house mother. I can wholeheartedly say that I support this license and any future license that Mr Burrows/red apple associates may put forward. My reasons being are that it is imperative that we have a licensed, regulated and controlled environment to ensure the safety and well being of performers. To not grant this license, in my opinion could prompt unlicensed events to pop up where there are no conditions or regulations therefore creating a potentially dangerous situation for performers and customers.

I would like to speak on behalf of the performers at the hearing of this license if permitted.

I writing to make my support of the proposed sexual entertainment licence for Eroticats at 30 Cambray place. I have attended several events ran by this company with my partner and have always found the staff, management and security staff very welcoming and professional.

Licensing Committee

Lap dancing at Cheltenham horse race festival meetings. The granting of a controlled lap dancing licence allows Cheltenham borough council the ability to set standards with the control of working conditions for the safety of lap dancers and customers.

Granting the licence for the safety of dancers and customers

Cheltenham lap dancing

The granting of a licence avoids lap dancing going underground. Men and women who visit the underground lap dancing club/s and the girls who dance could be at risk from exploitation.

Granting the licence for a specified number of days during the year makes sense.

To whom it may concern,

I am writing to express my support for the proposed SEV license for Jessop house, 30 cambray place, Cheltenham.

I believe having a regulated and controlled venue/licensed premises is the only safe way to ensure staff and customers enjoy sexual entertainment in the town.

Many thanks,

To whom it may concern, I would like to give my support for the proposed SEV license for 30 Cambray place (Eroticats).

I worked on the tills during March last year and found the event to be very well organised and felt safe during my shift. I was taken home in the Eroticats bus after I finished which was very helpful. I would like the opportunity to work for this company again as I really enjoy it and it boosts my incoming. I urge you to grant this licence so that Cheltenham can enjoy sexual entertainment in a controlled, regulated and safe space for all involved.

Many thanks,

The Licensing Section Cheltenham

email of support SEL application
Red Apple Associates Ltd / Eroticats,
30 Jessop House, Cambray Pl, Cheltenham GL50 1JP.

Again! I would like to express my concern regarding this SEL application and the effect the refusal of the SEL renewal by a company with a good track record. Could result with the unregulated lap dancing on these Cheltenham festival dates and lap dancing going underground with no control being no advantage or benefit for Cheltenham in anyway. With performers, customers and members of staff's safety during this extremely busy week put at risk.

Not supporting this application for the granting of a licence. Would remove everything achieved by Cheltenham Borough Council licencing over the past number of years in the creation of a safer working environment for performers and the customers during Cheltenham festivals.

Yours Sincerely

License Dept CBC

I have been made aware of a recent application for lap dancing, during the Cheltenham horse race festivals 2025. Having on occasions worked for Mr Burrows, found him a very responsible person. Myself and my husband attend many of the race meetings held at Cheltenham, along with a mixed group of friends the highlight being the March meeting.

Having notice a change of the people attending the race meetings mostly during the evenings socialising in Cheltenham after a day at the races. Using lap dancing entertainment as the main reason for the anti-social actions of some individuals is totally unfounded and not supported by any evidence. I feel it is unfair to put the blame on such a club. I don't believe that refusing a licence of a well-run venue offering lap dancing would solve any problems during March and benefit Cheltenham in any way.

Myself and friends all enjoy the lap dancing club, not for the lap dancing but the friendly and relaxed atmosphere where a club is not just full of men who are greatly under the influence of alcohol, which has become all too common recently at Cheltenham race meeting.

It would be unfair to restrict a club providing entertainment of this nature from objections from people who do not attend the races or socialise in Cheltenham.

I urge you to consider this application on its merits.

As a local Cheltenham person, I feel compelled to support a controlled SEL. Regularly attending the Cheltenham March festival. My wife and myself spend the evenings in Cheltenham town centre. Always visiting Eroticats club, myself, and my wife both have found Eroticats club to be a friendly and relax club. We have always recommended a visit to our friends. As not just a bar / club full of men who have drunk to much alcohol which seems to be the normal practice during Cheltenham in March.

A well-run club regulated club in Cheltenham is a vast improvement of the unregulated lap dance clubs of yesteryear.

Thank you for taking the time to consider my email of support.

Kind Regards,

The Licensing Section

Cambray Place

As Cheltenham resident I would like to express my full support regarding the application of Sexual Entertainment Venue to operate during the Cheltenham horse festivals.

I support this SEL application as it would be run at a licence and regulated responsible venue. Opposed to the “here today gone tomorrow from the badly run one-night venues which have occurred at previous horse race festivals in partnership with an experience SEL operator.

A well-run business that contributes to the Cheltenham night-time economy throughout the year, should receive help with their business by the granting of this licence.

Dear Sir,

I am writing to register my objection to the renewal of the above licence. Whilst not within my Borough ward it is within my County Council division of Charlton Park & College.

I am opposed, in principle to these establishments, they are outdated and add nothing to the attraction of Cheltenham as a tourism venue, as a festival venue, as a racing venue. The absence of these venues will not detract from our town in any way and will actually send out a strong message that Cheltenham does not accept a need for them and is fundamentally opposed to them in principle.

It had already been established that women do not find our town a safe place to be during race week and there is evidence to suggest that these venues contribute to that atmosphere, our town centre should be welcoming for all, and safe for all. I very much hope that when we review our policy on SEV's later this year we will adopt a policy which fundamentally is against and opposed to such venues.

I nevertheless recognise that our national laws are totally inadequate in preventing and stopping these activities because premises can hold such events, albeit infrequently, completely unregulated, clearly an appalling fall-back position.

So given where we are, it seems to me that the licensing committee's hands really are tied behind their backs and so if minded to approve can I suggest some further tightening of conditions ;

1. That the operating hours commence from 9.00pm to reduce the impact upon people who happen to be in town shopping and eating out and the impact upon nearby homes and businesses too

2. That in view of previous breaches, and the very real difficulty of regulating 'hidden' performances, the practice of booth one to one 'performances' is banned altogether.

Yours faithfully

Dear Sirs

This is an objection to the granting of a licence for the above premises.

Whether or not the applicant has a 'proven track record' in Cheltenham or elsewhere does not seem relevant. If this type of establishment is deemed to be necessary, surely it could be on the outskirts of the town well away from housing, schools, pubs etc.

Please ensure my name etc is not made public.

Yours faithfully

We strongly object to the opening of a strip club in the centre of Cheltenham for the sole purpose of satisfying the needs of the influx of men during racing weeks.

The venue will be situated opposite Cambray Baptist Church and a nearby nursery, which have both objected.

Cheltenham rightly has a good reputation of being a safe place for women, children and all visitors. We feel that the erotic performances that this venue will be hosting, will make the area a less safe place for tourists and citizens alike.

PLEASE DO NOT ISSUE A LICENCE!!!!

Licensing Cheltenham

Lap dancing has been in the town for a long time if there wasn't a need for lap dancing in Cheltenham in March and November it would simply not exist. If lap dancing is given guidelines to follow and restrictions put in place I don't see a problem. Objecting to lap dancing with guidelines and restrictions on the grounds of women's safety in Cheltenham Do objectors believe no guidelines or any restrictions being the safer option. Lap dancing can and will take place with or without a licence knowing where the lap dancing club and who is responsible for running it gives accountably.

I support the granting a licence with the guidelines agreed by the committee

I am writing to disagree very strongly with the very idea of a strip club in town. Strip clubs are anachronistic. They have become outdated, they are not helpful to anyone and in fact are dangerous. They are exploitative towards women, they debase women, they corrupt weak minds, mainly men and they have no place in a modern, progressive society. What on earth is anyone thinking? It will raise the rate of violence towards women in the town. No one wants that! This case in France now of the lady drugged and raped by her husband and countless other men, do not think that is totally separate from the likes of strip clubs, they are all connected. Firstly you debase women, then it is easier to hurt them. Since the 'me too' movement strip clubs should be consigned to history!

I find myself having to express my support for a sexual entertainment licence yet again. Not listening to the smear campaign gossip circulated by some individuals I have taken the time to read the licence application in full.

Being a Cheltenham resident, I would like to again express support regarding the application for a Sexual Entertainment licence renewal. A business that contributes to the Cheltenham nighttime economy throughout the year and chooses to diversify for the duration of the Cheltenham festivals.

A licence, to me indicates a responsible attitude towards adult entertainment.

Your faithfully

I have visited lap dancing in Cheltenham at a previous festival. With my partner after he finished work, we both enjoyed the night at a very busy club Eroticats in the town centre.

A controlled lap dance club in a suitable location during festivals, being run by responsible companies or individuals cooperating with CBC and the measures and strict rules in place, is common sense to control lap dancing, avoiding it going underground.

Uncontrolled could lead the exploitation of performers financially and physically.

I support a licence being granted.

Yours Sincerely

Dear Committee members

In regards to Mr Cambrays Curiosity / Eroticats dancers,
I am compelled to show my support yet again for a sexual entertainment licence

I have worked in the hospitality industry in Cheltenham most of my adult working life from the largest venue in Cheltenham and in more recent years the smaller niche venues.

I was very sceptical and questioned myself Is Cheltenham suitable for lap dancing? After my initial meeting with Steve and members of the Eroticats dancers. My mind was put at ease , the planning and procedures and the detailed attention to the health and safety, was second to none.

Anti-social behaviour increases during the Cheltenham festivals with the resources of the Gloucestershire constabulary greatly put to the test. A regulated SEV gives the Cheltenham council a partner to work with that provides a safe working environment for the dancers all members of staff and the customers who visit Cheltenham.

I would urge this application be given the consideration and support I believe it deserves during Cheltenham racing festivals.

To whom it may concern,

My reason for this email is to share my support for SEL venue in Cheltenham during the Cheltenham Festivals.

Having a licensed premises offering SE is far more positive than having pop-up SE venues. My thoughts towards this is because holding a license for a venue means comply with all safety regulations and requirements of the law. This includes safety for dancers, staff and customers.

Dear Licensing

I strongly object to the licensing of this strip club particularly the licensing variation that ONLY prevents sexual contact/simulated sex in performance areas but NOT elsewhere.

I also call for an end to private booths – where sexual contact has already been observed in another strip club this same operator runs.

With 500 punters/night, much better surveillance is also clearly needed.

A frequency exemption loophole means ‘occasional’ lap dancing happens during race weeks in unlicensed venues that the council cannot regulate. This means even licensed venues like this one can do as they chose or they will simply run as an unlicensed venue where the council has zero legal powers.

You are unable to keep women safe or represent your tax paying residents while this loophole exists. Please call on Parliament to close it urgently.

Cheltenham Licensing Section

Sexual Entertainment and lap dancing is popular with both genders during the Cheltenham festival. The festival increasing in popularity with females and couples not just males as portrayed in the social media.

With the male review nights advertised at the Cheltenham town hall, hosting nights with male performers dancing to sold out female audiences, without any objections on morality.

I fail to see why objections on grounds of morality for allowing female performers during Cheltenham 2024. When male performers at the Cheltenham Town Hall dance for a mixed audience. With all licenced codes of practice conditions in place, a local business that is trying to survive.

There has been more male dance shows this year operating under the exemption ruling I doubt if any inspection has been recorded unlike clubs operating with female dancers in March 2024

Are female performers dancing in Cheltenham or the male customers attending being discriminated against?

being discriminated for attending female performances?
Have the licensing/police ever inspected any male venue?

I would support this licence being granted on the grounds of equality.

I object to the licensing of this strip club particularly the licensing variation that ONLY prevents sexual contact/simulated sex in performance areas but NOT elsewhere.

I also call for an end to private booths – where sexual contact has already been observed in another strip club this same operator runs.

With 500 punters/night, much better surveillance is also clearly needed.

A frequency exemption loophole means 'occasional' lap dancing happens during race weeks in unlicensed venues that the council cannot regulate. This means even licensed venues like this one can do as they chose or they will simply run as an unlicensed venue where the council has zero legal powers.

You are unable to keep women safe or represent your tax paying residents while this loophole exists. Please call on Parliament to close it urgently.

The allowing of this kind of establishment raises many dark questions relating to the safety of women and girls in the area. Why should people have to tolerate this type of establishment? For years it has been widely recognised the harm that they caused and the danger they present to people. Please consider the impact it will have and the message it sends out to men! We live in an increasingly dangerous society I don't think I need to spell that out. As a women I am deeply concerned and disgusted by these types of establishments.

I object to the licensing of this strip club particularly the licensing variation that ONLY prevents sexual contact/simulated sex in performance areas but NOT elsewhere.

I also call for an end to private booths – where sexual contact has already been observed in another strip club this same operator runs.

With 500 punters/night, much better surveillance is also clearly needed.

A frequency exemption loophole means 'occasional' lap dancing happens during race weeks in unlicensed venues that the council cannot regulate. This means even licensed venues like this one can do as they chose or they will simply run as an unlicensed venue where the council has zero legal powers.

You are unable to keep women safe or represent your tax paying residents while this loophole exists. Please call on Parliament to close it urgently.

I object to the licensing of this strip club particularly the licensing variation that ONLY prevents sexual contact/simulated sex in performance areas but NOT elsewhere.

I also call for an end to private booths – where sexual contact has already been observed in another strip club this same operator runs.

With 500 punters/night, much better surveillance is also clearly needed.

A frequency exemption loophole means 'occasional' lap dancing happens during race weeks in unlicensed venues that the council cannot regulate. This means even licensed venues like this one can do as they chose or they will simply run as an unlicensed venue where the council has zero legal powers.

You are unable to keep women safe or represent your tax paying residents while this loophole exists. Please call on Parliament to close it urgently.

How on earth can you guarantee the safety of vulnerable young women if you are letting men touch them sexually.

While we are all adults over the age of 18, any human being is vulnerable when stripped naked and how can you object to or defend painful drunken sexual assault if you agreeing to 'low level' violations. It leaves women at risk of severe abuse just as many prostitutes suffer because men see them as less valuable than others. Please in 2024 start thinking of women and the message this gives out.

It won't drive things underground by banning it, everything's underground or online anyway. Please have some respect for Cheltenham and its residents.

Thanks for reading.

Dear Cheltenham Borough Council,

I object to the licensing of the strip club Eroticats, particularly the licensing variation that now only prevents sexual contact/simulated sex in performance areas but not elsewhere.

I also call for an end to its private booths – sexual contact has already been observed in the private booths at another strip club run by the same operator.

With 500 customer per night, much better, fully independent, surveillance is clearly also needed.

I understand that a frequency exemption loophole means 'occasional' lap dancing may legally happen during race weeks in totally unlicensed venues that the council has no powers to regulate, forcing the council to license strip clubs, but this means that even licensed venues like Eroticats can do as they chose - if not, they can simply run as an unlicensed venue where the council has zero legal powers.

Cheltenham Borough Council is unable to keep women safe or represent your tax-paying residents while this loophole exists. Please call on Parliament to close it now.

Not Buying It challenges the sex industries because of their overwhelming harms. Its founders helped ensure the introduction of SEV legislation for strip clubs, which were licensed like cafes prior to this. Since then, Not Buying It has been involved in successful legal challenges (on the grounds of breach of equality law) against councils for their pro-strip industry decision making.

We object to the current license application for an SEV at Jessop House - particularly the licensing variation that now ONLY stipulates that sexual contact/simulated sex may not take place in performance areas. Given the applicant's track record of sexual contact at his other

SEVs it is self-evident this variation gives a green light for such activities outside of performance areas.

We also call for an end to private booths at all your SEVs. Sexual contact has already been observed in the private booths of another strip club run by this same operator. Private booths are where sexual contact is standard, according to both research and performers - they can never be adequately monitored or controlled. Camden council won a court case some time ago when it sought to end private booths at one of its strip clubs (Red Rooms) which then challenged this - Camden council could be contacted directly for information on this.

With 500 punters/day, much better surveillance is also clearly needed (we would urge undercover investigation as the only possible chance of gaining some insight into what actually takes place in your strip clubs). Currently the council cannot possibly be abiding by equality law or keeping women in these clubs safe where such numbers are involved, where there are private booths and with an operator with a proven track record of providing sexual contact at his venues who is in effect calling for such contact 'via the back door' in this application.

Most importantly, we urge you to urgently lobby Parliament to end the frequency exemption loophole in SEV legislation which means 'occasional' lap dancing can take place in unlicensed venues that the council legally has no powers to control. This means even licensed venues like this applicant can essentially do as they chose. If the license is ever revoked, they simply set up as an unlicensed venue over which the council has zero legal or regulatory powers. Your strip clubs are holding your Council to ransom.

The exemption means you are unable to keep women safe or represent your tax paying residents inside and outside any of your strip clubs (Cheltenham is well renowned as turning into a 'no go zone' for women and girls during race meets). You cannot possibly be abiding by your legally binding equality duties and could face challenge on these grounds.

Please find more information about the realities and harms of the strip trade here:
<https://notbuyingit.org.uk/stillstrippingtheillusion>

And thank you for your consideration.

I am writing to object to the renewal application no 24/01577/SEXA, submitted by Red Apple Associates, t/a Eroticats for a sexual entertainment venue at 30 Cambray Place, Cheltenham.

Whilst I acknowledge the existence of the frequency exemption enacted by Schedule 3 of the Local Government (Miscellaneous Provisions) 1982, I believe that there are several areas of concern that require scrutiny and amendment in relation to the conditions applied to this license should it be granted.

It merits mention that outside of race events there is no demand for lap dancing in Cheltenham. There are no permanent SEVs operating in the town. It is therefore reasonable to conclude the demand and supply for lap dancing in Cheltenham is controlled by the operators – this is further supported by the removal of licensing conditions that allow the operators to solicit customers.

Further, there is a plethora of evidence previously provided to this committee that all women and girls are harmed by the commercial sexual exploitation and objectification of some women for the arousal and sexual gratification of men.

We know that women and girls feel unsafe in Cheltenham during race weeks, 69% in the most recent Cheltenham safety and night survey.

Sexual entertainment venues contribute to this. Evidence shows that they create no-go areas and indeed MooMoo, who operated under the frequency exemption in March race week, was number 3 on the top identified unsafe hotspots on the above-mentioned survey. Tanja Rahm, sex trade survivor says

“We have to consider that the existence of strip clubs is harmful to all women, not just to performers. In the area around strip clubs, drunk and sexually-aroused men spill out onto the street, carrying with them their antisocial, threatening and sexually-harassing behaviour. This creates a ‘no-go zone’ in the local community, forcing women – and particularly underage girls, ethnic minorities and vulnerable groups – to avoid the area.” (Source CEASE).

Megan Tyler, another sex trade survivor, says

“Strip clubs are utterly at odds with sex equality more generally, since they’re places where women are treated as sex objects that men feel entitled to use, buy and control. They set up an environment that legitimizes the larger infrastructures of sexual exploitation and stereotypes women in general.” (Source CEASE)

Licence conditions in relation to touching

All of the licences issued for venues in Cheltenham contain conditions (18 and 25) prohibiting touching between performers and between performers and customers. During March 2024 race week breaches of these conditions were identified at two of the three venues known to be operating in Cheltenham (MooMoo which operated under the exemption and Under the Prom which was licensed).

It is my understanding that the police issued a written warning to the operator of Under the Prom (European Events Consultants Limited is named as the current license holder) in relation to the multiple breaches of conditions 18 and 25 that were witnessed during a number of regulatory inspections during race week. A copy of the information obtained via FOI is included at the end of this objection.

Whilst no breaches of these conditions were identified during inspections of 30 Cambray Place, I believe it worth noting that

1. The applicant, via European Events Consultants Limited t/a Erotocats, appears to be the current SEV licence holder for Under the Prom. I believe this makes scrutiny of this SEV application and operation at this venue reasonable and relevant given the numerous breaches at Under the Prom.
2. The breaches of licence conditions found in the majority of venues in Cheltenham during race week confirm concerns previously raised with the committee that touching between performers and between performers and customers does occur.
3. Even with the 48 cameras the owner of Under The Prom referenced at the January 2024 breaches of touching conditions still occur.
4. There is extensive publicly available evidence, collated by organisations including Not Buying It, that despite licensing conditions, monitoring and compliance visits, breaches of the license conditions regarding touching occur in SEVs across the UK. It is clear that SEVs operating in Cheltenham are reflective of the wider national picture, rather than the exception they are presented as.

The plans and supplementary information submitted in support of this application do not provide measurements for the booths within which performances will take place. The scale on the drawings merely states 1:25 in A4 but no details of what the measure is. Without the information it is impossible for the committee to satisfy itself that the booths are of sufficient size to prevent touching.

I do not recall being able to see details of any CCTV that is installed in the venue. Measurements are required by section 2.5 of the council's SEV policy statement. Condition 25 prohibits touching between performers. It is reasonable to expect that the scale provided can enable all parties to calculate the size of the booths.

As previously raised with the committee, unless there is observation of all booths at all times, it is not possible to guarantee that there will be no physical contact between performer and customer. The fact that the application describes security personnel as "booth walkers" suggests that this will not be the case.

There is sufficient evidence to demonstrate that breach of touching conditions does occur at venues in Cheltenham and that the measures taken by the applicant / operator and the regulatory authorities are not sufficient to provide reasonable reassurance that these breaches can be prevented.

I would therefore ask that the committee make it a condition of this license that performances are not permitted in booths.

Variation request by applicant

I note that the applicant has requested the following variation to condition 25:

*Any bodily contact between entertainers or performers or any movement that indicates sexual activity or simulated sex between entertainers or performers is strictly forbidden in the **performance area**.*

I see no justification for this variation which appears to be a result of the breach found during a council inspection at Under the Prom during March 2024 race week, for which the applicant is the licence holder, see details below. I understand that a written warning was issued.

“On Tuesday 12th March at approximately 23:30hrs, physical contact was made between two performers. Breach of licence condition 25 ‘Any bodily contact between entertainers or performers or any movement that indicates sexual activity or simulated sex between entertainers or performers is strictly forbidden’.”

I would ask that, given the breach of license conditions in relation to touching observed at most of the venues in March race week, this variation is refused.

External Signage

As discussed at previous hearings, the area immediately outside of the venue where some of the signage is displayed is outside of the councils permitted designated zone, as well as being on the edge of a residential area and an area frequented by children.

The current license includes the following amendment in relation to the signage displayed on the exterior of the building.

Special Condition

“All signage and banners promoting ‘Eroticats’ on the exterior of the building must be removed not later than 20 minutes after closing and shall not be erected earlier than 20 minutes before opening each evening.”

It is my understanding that, following a complaint made to the council during March race week, the applicant was corresponded with under caution regarding a potential breach of this condition. I am advised that photographs were provided showing the signs on the pavement being displayed before 5pm and on the first-floor exterior of the building by 5.15pm.

The previous licensing officer advised that the signage on the pavement (an A board) is in fact not covered by this condition but would need permission under the Highways Act 1980. He confirmed it was his understanding that such permission had not been requested by the applicant at the time it was displayed in March.

Amendment to opening hours

This special condition was agreed at the 18th December 2023 meeting following a verbal representation made by the applicant that *“Reverting back to the 6pm start time was a recommendation made by the police and we discussed it with the council due to crime disorder”*.

Having requested further information regarding the “crime disorder”, the council have confirmed, by FOI request, that neither they nor the police can find evidence of any specific recommendation being made by the police to the council in this respect, or indeed discussed during any meetings. They maintain that such a recommendation has certainly

not been made since at least March 2021. Whilst it is possible that an informal conversation might have been had during a monitoring and compliance visit, it appears the parties to this arrangement have differing recollections on what has been discussed and agreed.

There are a number of venues in Cheltenham where members of the public can congregate outside during race week. One such venue, Taylor's, being directly opposite to 30 Cambray Place. As a resident I am not aware that this creates issues in relation to "crime disorder" to such an extent that hours of operation are changed.

It appears there is a lack of clarity around the evidence of "crime disorder" and subsequent discussions and "audit trail" to justify the change of opening time from 8pm to 6pm requested by the applicant. If evidence of disorder exists it would be helpful for this to be confirmed by the police and council as part of this application process.

Variation request for special condition

I note that the applicant has requested the special condition is amended to read:

Banners promoting "Eroticats" on the exterior of the building must be removed no later than 1 hour after closing and shall not be erected earlier than 1 hour before opening each evening.

The special condition was agreed, as a compromise given the sensitive area that the venue is located in and near following concerns raised by objectors. The applicant confirmed at that time that this was not a problem but was subsequently alleged to have breached this condition.

It is not an equitable or reasonable solution that this condition is amended, it is more reasonable that an experienced and professional venue operator ensures that obligations of the condition are adhered to given the wider context in which it was agreed.

Conclusion

If the committee elect to issue this license, I would ask the license conditions are amended to include the following:

1. Performances are not permitted in booths.
2. Opening hours revert to 8pm as outlined in the council's SEV policy.
3. The condition in relation to signage, if still required, is amended to reflect that it applies to all signage on or in the vicinity of the venue.
4. That the variation requests in relation to condition 25 and the special condition in relation to signage are refused.

Details of Breaches of Licensing Conditions 18 and 25 identified during March 2024 race week at Under the Prom which is operated by the applicant.

"During routine licence inspections at Under the Prom during the March 2024 race week, the following breaches of conditions in regards to Sex Establishment Licence Ref No: 23/01946/SEXR were identified by those carrying out the visits.

- *On Tuesday 12th March at approximately 23:10hrs physical touching took place in the performance area. Breach of condition 18 'During any performance there must be no physical contact between the performer and any member of the viewing public'*
- *On Tuesday 12th March at approximately 23:30hrs, physical contact was made between two performers. Breach of licence condition 25 'Any bodily contact between entertainers or performers or any movement that indicates sexual activity or simulated sex between entertainers or performers is strictly forbidden'.*
- *On Wednesday 13th March at approximately 23:55hrs physical touching took place in the performance area. Breach of condition 18 'During any performance there must be no physical contact between the performer and any member of the viewing public'*

These breaches were dealt with by warning letter due to the steps taken by the operator to mitigate the likelihood of them reoccurring being considered satisfactory."

Cheltenham licensing section
Committee members

Owner of a nationwide promotional company based in Bristol. I company supplies promotional staff to venues in the Cheltenham area throughout the year including Red Apple/Eroticats dancers during the Cheltenham festivals.

I have found Red Apple an organized and professional operation with their proactive approach regarding health & safety towards customers and staff. Including a training program in partnership with GRASAC prior to the March festival 2023 my staff in attendance. On numerous occasions, Griffin promotional staff have assisted with lone females calling the Eroticats courtesy bus returning them to their accommodation, March 2024 the police being contacted via Red Apple/ Eroticats regarding some serious anti- social behaviour in and around Cheltenham.

Red Apple have worked with CBC that has benefited Cheltenham at festivals. With professional and proactive attitude towards SEL Management in Cheltenham.

I support the granting of the Cambray Place SEL 2025 application.

Regards

Good Afternoon,
SEL application support

Working in a licensed premises at all times has only a positive attitude, my reasons for this is that there will be rules and regulations that need to be met to ensure the staff and public is safe. This is hugely important for those in this industry of work.

I strongly believe that everyone has the right to be safe at work, this should be in all types of work environments of which career path you take.

Therefore if you choose to be a lap dancer for your choice of work, then working for a company who cooperates with the authorities deserves the rest for conducting themselves in a professional, legal with a responsible attitude.

Allowing performers and all the staff who work in Cheltenham during the festivals the support they deserve.

I am a female who has lived in Cheltenham all of my life. I enjoy the nightlife in Cheltenham and I enjoy the atmosphere in Cheltenham during the festival race meetings.

I have visited Eroticats a numerous amount of times throughout the years they have been operating and this is my favourite venue to attend. The reason for this is that the staff that work at Eroticats are genuinely good at their jobs ensuring that members of the public are safe.

It is a venue that is mixed for both female and males to enjoy and no one is discriminated against.

I thoroughly enjoy my nights at Eroticats and would be disappointed if they were not granted SEL.

I have added my address however I do not want it to be made public.

Dear madam / sir,

We object to the licensing of this strip club, in particular the licensing variation that now ONLY prevents sexual contact/simulated sex in performance areas but NOT elsewhere. This variation will put women working at the venue under a lot of pressure to engage in sexual activity with male punters and make them vulnerable to coercion using monetary, psychological and physical means by the men who pay and expect the women to provide any service they want.

We also call for an end to the private booths at Eroticats. Sexual contact has already been observed in the private booths at another strip club run by the same operator.

With up to 500 punters/night, much better, fully independent, surveillance is clearly also needed to ensure the safety of the women working at this strip club.

We understand that a frequency exemption loophole means 'occasional' lap dancing may legally happen during race weeks in totally unlicensed venues, which the council has no powers whatsoever to regulate. This may result in the council feeling that their hand is forced to provide licenses to strip clubs, but also means that licensed venues like Eroticats can basically do as they please.

Even if they are then denied a license on this occasion, they are likely to simply set up as an unlicensed venue in future, where the council has zero legal powers.

You will be unable to keep women safe or represent your tax paying residents while this exemption exists. We therefore urge you to double down on your efforts and call on Parliament to close it now.

With kind regards,

MACS (Male Allies Challenging Sexism)

I object to the licensing of this strip club in its entirety: this is 2024 & women are NOT a commodity to be bought & sold for men's sexual pleasure!

With the current epidemic of MALE violence against women & girls (both in the UK & Worldwide), ANY form of encouragement towards demeaning women (especially in this environment) just teaches men that they can treat women however they like.

It needs to STOP!

NOW!

We need, as a society, to call a halt to ANY form of misogyny. And that includes "legally" encouraging sexual abuse on women.

Dear sir/madam,

I am emailing to voice my opposition to sex 'entertainment' in Cheltenham centre and specifically the application for the Eroticats venue at Cambray place.

This is in the centre of the town where my teenage daughters and many young women go and this sort of business does not make women feel safe in town.

It is hard enough for women to feel safe and to be able to enjoy being out at night, without the council actively attracting people to our town centre that come with the aim of objectifying women.

This goes against all the hard work that is being done by the council and volunteer agencies to keep the town centre a safe space at night.

My understanding is that it is primarily for race weeks. However, if people can't get enough kicks out of the horses, then they shouldn't be coming to Cheltenham or Red Apple Associates can open a venue out of town. Why should we have to put up with misogyny in our faces? We are better than this and people who visit the town need to respect that.

The town centre should be a place that is welcoming and feels safe for all and this venue doesn't reflect what most people want their town to be. It's near shops, nurseries and business that we all use and it's presence in this prominent place is not appropriate and will significantly change the tone of the area. It's upsetting that our children are exposed to this for the sake of money making.

Please can you kindly register my objection.

Cheltenham Councillors

My colleague has talked about story's circulating concerning plans of the renewal of a new licenced lap dance club in March 2025 Cambray Place, Cheltenham. It is not a new club and was open in March this year with no trouble. Walking past in March daytime you wouldn't know it was a strip club.

What would make the area anymore unsafe than elsewhere in Cheltenham?

The busiest week of the year especially in March Cheltenham has the reputation of safe town.

Grant licence for March

Dear Committee Members,

I am writing to register my objection to this application.

Cambray Place is an area used by families for shopping and meeting up; the presence of a Sexual Entertainment Venue can form no part of this purpose.

Additionally, the SEV would be in close proximity to Cambray Baptist Church. The nature of the venue is offensive, and in direct opposition to Christian beliefs and values. I am also aware that the Church does hold some evening meetings coinciding with times when the proposed SEV would be open.

Yours sincerely,

I would like to formally object to the 'Sex Entertainment Venue ' proposal opposite Cambray Baptist Church.

My objections are that it would be out of keeping with the character of the area. This is a shopping and meeting area, and this type of club is simply out of character. It is also close to a Christian church, and as such, offensive to the church members. Finally, I, for one, would avoid the area.

I hope you refuse permission for it.

Re; 'Sexual Entertainment' License application for Adult Entertainment Venue on Cambray Place

Dear Licensing Section,

I write to you to formally object and oppose the 'Sexual Entertainment' licensing application for the Adult Entertainment Venue (AEV) located on Cambray Place, Cheltenham, for the following reasons.

This application if approved will undoubtedly put women and girls at significant risk of sexual objectification, sexual discrimination, sexual harassment and sexual violence in this area of Cheltenham, given the existing criminal activity surrounding human trafficking and sexual exploitation connected to the Cheltenham Racing festivals this would only serve to compound this illicit behaviour and culture. If the local authority were, to approve this application this would undoubtedly convey the message that they're in agreement and condone the sexual exploitation of women and girls.

There is also ever-increasing evidence of the link between AEVs, prostitution and violence against women and girls. The Gender Equality Duty 2007, legally requires local authorities to promote equality between men and women in all that they do. The gender equality duty is particularly relevant in relation to the licensing of AEVs because of the gendered nature of sex establishments like adult like lap dancing clubs, etc and because of the negative impact that these AEVs have on efforts to promote equality between men and women.

The negative implications of AEVs on women are outlined below: AEVs normalise the sexual objectification of women in contradiction to efforts to promote equality between women and men.

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

Similarly, the UK based End Violence Against Women coalition has called on the UK government to tackle the sexualisation of women and girls because it provides a conducive context” for violence against women. For recent research on this issue see these research findings which show how objectification of women in lads mags is in differentiable to most people from the language used by sex offenders to talk about their victims (<http://www.mdx.ac.uk/aboutus/news-events/news/mags.aspx>).

Similar to ‘lads mags’, AEVs promote “sex-object” culture - the mainstreaming of the sex and porn industries and the ever increasing sexual objectification of women and girls. In addition, the PR makeover of branding lap dancing and AEV 's as glamorous and “harmful fun”, have contributed to a significant percentage of teenage girls seeing being a lap dancer as an ideal profession. We need to think about how our culture treats women more generally. Teresa May at the Women’s Aid Conference 2010: “It is only when businesses appreciate their responsibility to end the sexualisation of women that some people will stop treating women like objects. And it’s only when our communities stand up and say violence against women is unacceptable – that attitudes will really begin to change”.

As a local resident and parent of both boys and a girl, I would urge the councillors to make a stand and reject this ‘sexual entertainment’ licensing application, as not only will it effect the reputation of Cheltenham, but the crime, disorder and affects on the local residences, businesses. It would be offensive to the Christian community of Cambray Baptist Church directly opposite, Muslims and other faiths represented in the local area.

There is also a children’s nursery and children’s Dance School very close to the AEV, which is highly inappropriate and would likely expose young girls to inappropriate sexual conduct and behaviour. A review by the Department of Work and Pensions found that ‘75% of women involved in prostitution were drawn into prostitution when they were children’. With many young people spending their time in the town centre, they would be put at high-risk of exposure around the Cambray Place area, particularly with the close proximity of a number of public houses to the AEV, adding alcohol to the mix would further increase the likelihood of risk to these vulnerable individuals.

This is something that I urge the local authorities to not allow or condone but rather protect our children and youth in our community from the risk of harm both physically and mentally by rejecting this application.

It would also contradict and undermine the aim of the local community to bring about positive, genuinely sustainable characterful and thriving neighbourhoods within Cheltenham which support the need to and principle of up skilling its population and closing the education gap across its communities.

Thank you for time and consideration of the content of this letter.

With Kind Regards

I am writing to register Gloucestershire Rape and Sexual Abuse Centre (GRASAC) objection to the renewal of the above license. There is both local and national evidence which supports the view that approving further licenses would be yet another step away from the national (and local) rhetoric around Violence Against Women and Girls (VAWG).

Using Cheltenham council's own survey as evidence (August 2021) – that 75 % of women feel unsafe during race weeks, we would object to the approval of licenses for SEV's and would ask that the elected councillors take note of the views of residents expressed. GRASAC is therefore objecting on the basis of safety of all women and girls in Cheltenham, not just those working in the venue(s).

The Police and Crime Commissioner, Chris Nelson, recognises that women and girls often feel unsafe in their communities and regularly consider their day-to-day movements based on needing to feel safe. As such, The OPCC has committed to 'tackling all forms of violence and intimidation that women experience, whether it is catcalling, harassment, rape or domestic abuse' (Gloucestershire PCC).

GRASAC would also like to highlight that Cheltenham Borough council runs a multi-agency VAWG forum which meets regularly to discuss issues relating to VAWG in Cheltenham and ensure the voices of women and girls are being heard. How can the council fund this VAWG forum and put significant time and effort into advancing the VAWG agenda, whilst at the same time continuing to approve licenses for sexual entertainment venues in the town? The following is an excerpt from the *Safe and Equal Bristol report: Sexual Entertainment Venues Policy Review* (November 2021). It places sexual entertainment venues in the VAWG picture quite clearly:

"In the largest ever multinational study of male violence against women published in 2013 by the United Nations, the most common motivation of men who have admitted to rape is the belief that they are entitled to sex, even without the female partner's consent. This study interviewed 10,000 men and 1 in 4 had raped their wife, their partner, or another woman. That is not an insignificant minority of men. Entitlement, which is the stock in trade of lap dancing clubs, is the main motivation given by men who rape. 70-80 percent of men who had raped reported that they believed they had the right to sex. The second most frequently reported motivation was related to entertainment seeking – interpreting forced sexual access to women's bodies as fun or as something to alleviate boredom. The most commonly identified attitudinal risk factor for men's sexual and domestic violence and coercion against women globally stems from gender inequality - a belief in the dominance of men, and their needs or wishes and bodies, over women".

A further study, '*Men's Objectifying Media Consumption, Objectification of Women, and Attitudes Supportive of Violence Against Women*' (November 2015) noted:

'Men who viewed women as sex objects had attitudes more supportive of violence against women.'

These studies highlight that SEV's being open and VAWG are inextricably linked, and this cannot be ignored. Returning to the first study referenced in this objection, conducted by Cheltenham Borough Council, that 75 % of women feel unsafe during race weeks in the town.

Finally, I am sure council members will be aware that Maggie Blyth, the Police national lead for VAWG, said: "*Violence against women and girls is a national emergency... We need to move forward as a society to make change and no longer accept VAWG as inevitable.*" These comments were made in February 2024 against a background of increasing cases of VAWG in the UK. The Crime Survey for England and Wales estimates that the number of female victims of sexual harassment aged 16+ in England and Wales is 2,048,483 (year ending March 2023) *Source: National Policing Statement 2024 For Violence Against Women and Girls. Crime Survey for England and Wales.* Given the evidence laid out throughout GRASAC's objection, it is hard to understand a perspective whereby the approval of SEV licenses does not contribute to the continued harassment and fear of violence that women and girls in Cheltenham face.

I am writing to object to the application for a sex entertainment licence for premises at Cambray Place.

It is completely out of character within this location which is a quiet street just off the main shopping area. It is a family-oriented area with a nursery, children's dance school, church with numerous children's groups and several family friendly cafes. The nearby shops include family food shops, a sweet shop and a shop selling books and crafts for children. It is also a residential area. A sexual entertainment venue completely jars with the character of this part of town.

The venue is directly opposite a place of worship and as a Christian, I find it offensive to have such a venue operating within metres of the front doors of a church. It is against my beliefs and values for sex to be used as entertainment and for profit and distressing for this to be taking place so close to a building used to worship God.

If this licence is granted, it will cause significant disruption to the businesses and organisations nearby. Two therapy practices in the locality who work with women who have experienced sexual abuse will be forced to reschedule appointments to protect the wellbeing of their clients, and the church will be forced to reorganise its groups and meetings to avoid children and families having to walk through groups of men waiting to gain entry to the sex venue. Whilst this venue operated last year, I felt extremely vulnerable and unsafe as a woman walking through Cambray Place. I do not believe that this is in keeping with the character of our Regency town, particularly in this quiet, family friendly area.

We are objecting to the proposed sex entertainment venue in Cheltenham. The venue is in a busy shopping area used by a wide range of people from children to senior citizens. Some of these will be vulnerable and should be protected. There is a church opposite, and such a venue would cause embarrassment to the church goers, as they would have this offence presented right in their face. Men leaving this establishment may come away feeling sexually aroused and could be a danger to innocent females passing by. We therefore ask you not to grant a licence to the business.

Yours Sincerely

To Whom It May Concern

I am writing to formally object to the licensing of a Sex Entertainment Venue in Cambray Place. Our community is predominantly a family-oriented area, known for its general shopping and gathering spaces.

The presence of a nursery and dance school nearby, along with a sweet shop on the corner, highlights the family-friendly nature of our neighbourhood. Additionally, the church directly opposite our location fosters a strong sense of community and shared values.

The proposed use is not only offensive but fundamentally contradicts the beliefs and values of many residents. The activities planned would potentially deter families and individuals from visiting our area, especially during the active weeks.

I urge you to consider the negative impact this licensing would have on our community's character and cohesion.

Thank you for your attention to this matter.

Sincerely

Dear Licensing Team,

I am writing to lodge an objection to the re-licensing of the Adult Entertainment Venue situated opposite Cambray Baptist Church in Cheltenham.

My objection is based on the following grounds:

1. Character of the Area: The location of this venue in a predominantly residential and community-oriented area undermines the nature of the neighbourhood. The venue's presence is not in keeping with the family-friendly character of the area and may have a negative impact on the local community.

2. Proximity to a Place of Worship: Being directly opposite Cambray Baptist Church, a well-attended place of worship, the existence of this venue is highly inappropriate. It poses a moral and ethical conflict, particularly for members of the congregation and others who frequent the church.

3. Use of Other Premises in the Area: The presence of this establishment can discourage families, businesses, and community groups from fully utilizing other local premises. This could lead to a decline in the area's appeal and reduce the potential for positive growth in the neighbourhood.

For these reasons, I respectfully urge you to deny the application for re-licensing this venue. It is in the best interest of the community, the local character, and the protection of places of worship to reject the renewal.

Thank you for your attention to this matter. I look forward to your careful consideration of this objection.

Warm Regards,

Good afternoon,

I write regarding Red Apple Associates, T/A Eroticats, The application for the SEL, the regulation of sexual entertainment in Cheltenham that coincides with the Cheltenham festival dates.

Ensuring that performers and patrons of sexual entertainment venues /lap-dancing clubs are properly protected by the local authority Cheltenham borough council, subject to the very stringent requirements that protect patrons and performers.

The absence of a regulated and control SEV licence would consequence Cheltenham venues using the opportunity without the experience and guidance. Criminal gangs seizing control and exploitation of patrons and performers without any safeguards.

The exemption was designed with the best intentions to allow for one-off entertainment events, at licence premises working men's club's, stripper-grams, stag and hen parties taking place throughout the year at different licenced premises in Gloucestershire including many sold out male review performances at the Cheltenham town hall.

Nothing has change with the SEL so I urge the granting

SEV license application – 24/01577SEXA Date: 29/09/2024

Dear Licensing team,

The Nelson Trust is against the application submitted by Red Apple Associates Ltd, trading as 'Eroticats' to allow for stripping at Jessop House, 30 Cambray Place, Cheltenham to coincide with race meets at Cheltenham Racecourse throughout the year.

The Nelson Trust has been supporting women from Cheltenham and around the county who have been involved in the sex trade for a number of years. We work with women that face addiction, homelessness, trauma from past abuse and some of them sell sex. A UK Home Office report published in 2019 mentioned that most lap dancers also sell sex, and the longer they work in this industry, the more likely they are to sell sex. We know that many women who sell sex are exposed to violence in many forms and this has a detrimental impact on their mental health as well as their physical health.

We want every woman and girl that lives, works, studies or visits Cheltenham and across the county to feel and to be safe.

We also believe that where Sexual Entertainment Venues (SEVs) operate there are always multiple harms to women, in and outside those premises, that cannot be mitigated. Many objections you have received in previous years from local people and groups (GRASAC, Glos Women, Chelt VAWG group, and others) have outlined and evidenced how such clubs can harm women and girls.

It is encouraging that Cheltenham Borough Council (CBC) is undertaking a review of its sexual entertainment policy and has invited a range of stakeholders to be part of this process. It is a pivotal chance for CBC to set a precedent and to demonstrate your commitment to safeguarding women and girls in our community when making your decision on the outcome of this application.

The Nelson Trust

To whom it may concern,

I wish to object strongly to the issuing of any licence for sexual entertainment at Jessop House. Cambray Baptist Church is an active religious community that provides services and activities in the evenings for children and the elderly. Encouraging numbers of alcohol and lust fuelled men to the area will make it off putting and unsafe for people attending the church and the other businesses in the area.

I am also concerned about the extra pressure that would be put on the police and street pastors, as they attempt to keep women who are not in the sex trade safe to enjoy their evenings in the other entertainment establishments in the town.

Do we really need to sully the beauty and reputation of our town by linking it in peoples' minds as a place that exploits women for sexual gratification?

I hope that as a council you will put the wider needs of the town over those of an individual business, who can make just as much profit offering a relaxing place to enjoy post-race meeting drinks, without recourse to the objectification and degradation of women. Thank you for your consideration,

Dear Sir/Madam,

I am writing to express my objection to the licensing of the Sexual Entertainment Venue in Cambray Place, which masquerades as 'Mr Cambrays Curiosity' [sic] the rest of the year.

Granting a licence for sexual entertainment in this venue, even for a small number of race days each year, is not keeping with the character of the rest of the area. Cambray Place is otherwise a very pleasant area, open for families with a sweet shop on the corner. I live in east Cheltenham and visit Cambray Place with my children regularly. Furthermore, the proposed venue is in an area close to a nursery, very close to a dance school and directly opposite a large church, which I understand gets about 300 people on a Sunday and runs activities throughout the week.

Please consider these two grounds when considering the granting of a licence and make a decision for the greater good of our beloved town of Cheltenham.

Kind regards,

Good morning

I am writing to object to the opening of a sex entertainment venue in Cheltenham, cambray place.

I object based on the grounds;

1.The character of area is populated by families and young people accessing nursery and activities. There area is also host to some of Cheltenhams best restaurants. Customers and residential who frequent these areas will no longer do so which will have an impact on local businesses which are already established.

2. The proximity to a place of worship.

The venue will be across from a place church which is a community to number of people from all walks of life including vulnerable adults and children. The sex venue is opposition to the Christian beliefs which teaches about safe relationships and worth, the fundamental purpose of a sex entertainment venue is exploitation against women and is an offensive establishment to the entire community.

I therefore object to the proposal

Kind regards

To whom it may concern at the council licensing office

I am writing to formally object to the licensing of the 'Sex Entertainment Venue' opposite the Cambray Baptist Church.

First of all I believe that this establishment is out of character with the area. This is an area at the centre of the town, frequented by families, children and used by all for shopping and gathering. I believe that were this license to be granted it would severely affect the character and reputation of the town. Other premises in the same area include a nursery, dance school, and sweet shop. It is also directly opposite a place of worship. It beggars belief that such an establishment should even exist here, let alone that the owners are seeking more licensing rights. This establishment is offensive, degrading to the town and utterly offensive to our beliefs and values as Christian believers in the community. I also believe that this will have a negative impact on commerce in the town and will drive away local people (and people from out of town) from entering the town on the days the establishment is active.

I am the Senior Minister of Cheltenham Elim Church in St. George's Road and my views are reflective of my congregation (around 250 people).

Dear Sir/Madam,

I am writing to you to object to the re-licencing of The Adult 'Entertainment' Venue opposite the Cambray Baptist Church GL50 1JS.

There are many children and young teenagers go to church on a weekly basis, especially during the holiday periods, there are hundreds of children taking part in the church activities. THE ADULT ENTERTAINMENT VENUE IS TOXIC TO THE YOUNG CHILDREN. Therefore, I am strongly against the relicensing of the venue.

Should you have any questions please do not hesitate to contact me.

Yours Sincerely,

I write with regard to 30 Cambray Place (formerly Wild Beer Pub, immediately opposite Cambray Baptist Church).

I note that there is an application to re-licence as Sexual Entertainment Venue.

I wish to object to this application in view of the following:-

- **Character of the Area (4.5di and 4.10):**

This proposal is contrary character of the area. This is as it is largely residential and catering to families. In particular the Cambray Baptist Church and the dance school which both host a range of activities catering for families. Also, there is day care there which provides services for families.

- **Use to which other premises in the area are put (4.5dii and 4.10 b & d refers):**

There are a number of businesses that attract children, vulnerable adults, and the like to the area. The coffee cart opposite @Hallowed Grounds@ interacts with a number of individuals with mental and physical disabilities that find safety and community here. There are also two mental health facilities: the Practice Rooms at 33 Cambray Place and the Counselling rooms at 10 Bath Street. I understand that these two mental health facilities counsel victims of sexual assault and individuals who have come out of the sex-trade.

- **Proximity to a Place of Worship (4.10c):**

This refers to Cambray Baptist Church which is opposite. Confidence in the area is important for those who are aged or have children. They rely on the ability to pick up/drop off in a well-lit area. There alternative access to the church would mean parking on Rodney Road; however, this is not suitable for all of the youth and children's evening activities. This is as the Rodney Road is not as well lit.

- **Women's safety concerns:**

I refer in particular to Cheltenham Borough's own survey "Safety of Women at Night" which was presented on 18 October 2021. The Executive Summary itself begins "The council and its partners have been concerned about the safety of women at night for a number of years now." The Background 1.1 states "The council and its partners have been concerned about the safety of women at night for a number of years as the reports of sexual harassment, abuse and intimidation have increased." Section 2 Safety of women at night survey: quotes that "72% of respondents told us that that they don't feel safe at night, **rising to 75% not feeling safe during race week.**". I note that women workers, not least from the bars - apart from 30 Cambray Place - may pass through the area. In addition, other women may pass through the area. The proposed application may affect that an even larger number of women in that the 75% to not feel safe during race week. This is going contrary to Cheltenham Borough Council's own objective in "Corporate and community plan Implications": "Keeping women safe at night in our town centre...".

I thank you for your attention to matter.

Dear Licencing Section,

Objection to Licence Application for SEV, Jessop House, 30 Cambray Place

As Trustees of Cambray Baptist Church we are writing to you on behalf of the Church. Doing so we represent over 300 adults and 100 children and young people of Cambray Baptist

Church. We are an active church which engages the community around the church and throughout Cheltenham. The church building and its many activities for children, youth, families, adults with learning needs, vulnerable adults and elderly people is located immediately facing the site relating to the application.

As a licencing committee you are able to use your discretionary powers to refuse this application. In these discretionary powers, although you only need issues with any one of these legal grounds to refuse permission, there are good reasons to refuse permission on all four legal grounds which are open to you:

Firstly, sensitivity to proximity to a place of worship. The proximity is clear and evident. Such a venue opposite an active and vibrant place of worship which is open and used throughout the week and in many evenings is an affront and an insult, not only to the people of Cambray Baptist Church, but to all churches in Cheltenham. It is just as offensive to us as it would be to those of other religions whose premises have not been impacted. The law makes allowance for avoidance of offence to religious beliefs, law which the council is given responsibility to uphold. In days of increased awareness of sensitivity to the views and beliefs of others, the offence the proximity causes cannot be understated. Both press and public have already concluded that the council has been negligent, or even wilful, in causing offence, and you will only further underline continued willingness to cause offence if you permit this licencing application.

Secondly, regarding the Character of the Area. The plans proposed soon after John Lewis opened to refurbish Cambray Place have recognised it as a 'destination' and cafe area suitable for families. The 2011 Census shows that Cambray Place is a residential area, including the flats above the shops that reach into the Designated Permitted Area. Of the residents in 2011, 42% are female, 16% of residences having children in their household, 52% of residents are aged 16-34, and 19% of residents aged over 65, with a complex for older people at the end of Cambray Place. The family feel is reflected in the local businesses, such as John Lewis on High Street, the Hickory Dickory nursery 5 doors from the venue site, and a children's Sweet shop very close by on High Street. The Dance School on High Street has classes into the evenings. Cambray Place roundabout is a regular drop-off point for families transporting children to these locations. It is clear that it is an area in which a Sexual Entertainment Venue is wholly out of character, and certainly is at odds with the Council's past proposals for Cambray Place.

Thirdly, regarding the use to which other premises in the area are put, we have already noted the childcentric shops and businesses. In addition Cambray Baptist Church itself is a family church. We have a full-time Children, Youth and Family Pastor because of the extent of our provision for Children and Young People. We provide Youth and children's clubs into the evenings weekly, and Schools events termly in the day. We run the local Community Christmas Market in Cambray Place. We have provision in the day for Mums and non-working mothers and children. We have regular meetings for old people and for adults with learning difficulties, some in the evenings. A thriving Chinese Church also meets on our premises, and again runs events with young people and children in attendance. And we have families who frequent our Coffee shop and other local coffee shops. A Sexual Entertainment Venue within 10 meters is inappropriate. In the time since the SEV has

operated, fears and worries of parents have only increased – they have *not* been reassured by any of the supposed mitigations and provisions proposed by the council, which are (quite literally) merely ‘window dressing’.

Fourthly, regarding the Designated Permitted Area. Your 2020 Policy Statement identifies a DPA outside of which there should be no permitted Sexual Entertainment Venue. Page 11 of that policy gives a map of the boundaries. The property in which the venue is situated is on the very edge of that boundary but area *immediately* in front of the property (i.e. along the edge of its fence and front step) is not within the designated permitted area. You have therefore already decided that immediately outside its door is an inappropriate location. When the site was used during Race Week in 2023 the venue cordoned off an area of the street (i.e. not within the DPA) to queue clients into and out of the property. Although advertising pictures on the fencing (again, not within the DPA) was modified in 2024, the SEV nonetheless operated outside the DPA to drop-off, queue, and release their clientele and workers. They continued to be seen distributing flyers and escorting people to the premises in the part of Cambray Place which is outside the DPA. Their minibuses, with clear markings as to the nature of the business, stopping immediately outside the church and in parts of Cambray Place which are not in the DPA. It is clear that the SEV is unable to operate without extending beyond the Designated Permitted Area, and therefore that it is an inappropriate place to host the venue.

In summary, there are deeply seated and very strong grounds on every legal point where the licensing Committee are permitted to take a decision to turn down this application. We ask you to use these grounds to turn down this and any future license application. But, there is a further reason we would wish to point out – an issue of contradiction in the council’s own actions and expressed concerns. Your research on “The Safety of women in the evening and at nighttime” points clearly to the problem of woman’s safety and security in Cheltenham. In the 2023 survey 72% did not feel safe at night and 33% reported unwanted behaviour in pubs and clubs. 94% of respondents said they had to change their behaviour as a result of their experience. Strong and increasing opposition from women’s groups was a feature of the objections last year, and the anger relating to this issue has only increased by the additional operating days given to the venue. We continue to be approached by women who express fears and concerns regarding the SEV, and its presence does cause women to change their behaviour not only during its operation but also at other times – clearly exacerbating the very issue that the council says it wishes to respond to. There is a clear mismatch between the licensing of the SEV and council policy on woman’s perceptions and experiences of sexual violence and safety.

We highlight again that each of the above points are in themselves a strong reason why this application for a license or any future license extensions should not be granted to operate a Sexual Entertainment Venue in this location. Your due consideration to our objections is vital to this church and our legal rights to freedom of offence in worship and belief. We are aware that you do not permit ‘moral’ grounds for objection, though any decision on this matter by the licencing committee is, de facto, a moral decision. We continue to be disappointed that the council does not recognise its own moral decision making whilst refusing other voices on this matter. We have excluded such grounds in this letter, as directed. However we call on the sub-committee to recognise that leadership is always

moral leadership, and that they *are* taking de-facto moral leadership, and therefore moral responsibility, in the decisions they make.

Thank you for your careful consideration of this letter of objection.
On behalf of the Trustees of Cambray Baptist Church

As a resident of Cambray place, there is more of a disturbance on a normal Saturday night! Groups of very loud young people using Cambray place as the short cut from the Moon Under Water, Old Bath Road to the late-night clubs in Regent St, Promenade.

30 Cambray Place, this building was empty for and long time and its appearance shabby. Money has been invested, from exterior you would not believe sex entertainment took place there in March 2024, very discreet.

Dear licensing team,

I write to object to the sexual entertainment venue licence renewal and variation ref 24/01577/SEXA

Your 2020 [community impact statement](#) describes the “inherent risk for performers” working in sexual entertainment venues, and states the council “is aware that females in particular feel disadvantaged by the sexual entertainment and licensing of SEVs. This is manifested in both a general sense of feeling objectified and more specifically through feeling intimidated and unwelcome in the vicinity of licensed SEVs.”

The impact statement also describes the negative consequences for children, young people and older people.

To improve the situation, the impact statement says “A number of policy conditions have been tightened up... including those relating to...promotional staff and promotional activity.”

This tightened up approach is demonstrated in the current SEV Policy standard on “Advertising, solicitation and displays” (standard 6) which states:

“There shall not be displayed outside the premises, in the immediate vicinity, or elsewhere within the Town any advertisements that indicate or suggest that any form of Relevant Entertainment takes place on the premises. This includes the display of any advertisement, word, letter, model, sign, light, placard, board, notice, device, representation, drawing, writing or any matter or thing (where illuminated or not) including in any of the following ways:

- a) by means of personal solicitation in the locality of the licensed premises;
- b) by means of leafleting in the locality;
- c) by means of externally displayed advertisement (such as on billboards or posters) in any part of the Council's administrative area.
- d) by means of cruising vehicles or use of any other form of solicitation to invite people into the premises."

All this seems very robust and reasonable to me. However, the applicant has asked that this be changed as follows:

"1. The Applicant is allowed to solicit individuals to attend the premises during the hours the licence is in operation, provided that no solicitation takes place to anyone who appears to be under the age of 25.

2. The Applicant is allowed to operate a courtesy vehicle to transport dancers and clientele to and from the venue at all times. Further to be allowed to advertise, including by way of leaflets, the courtesy vehicle at all times during the permitted licence hours."

I ask the council to reject this variation. Permitting it waters down what seems to be a good policy document. Please hold firm and put the needs of local residents above those of the operators of sexual entertainment venues.

Best wishes

Licence Section

Dear Committee,

Working in hospitality on the March, October & November festivals I believe there is a definite need for Lap dancing. The large groups of males who come to Cheltenham constantly ask where the lap dancing clubs are or where is Eroticats tonight.

A regulated licence lap dance club controlled gives the residents and visitors the knowledge where they are and in a suitable location with this being a renewal agreed previously must be. Which avoids a club being run for a night in a less than suitable location

I have with my partner gone to a lap dance club Cheltenham and we both had an enjoyable evening. I would appreciate the choice for myself and partner to make the decision if we want to go, if someone does not to go DON, T.

We would like to support the granting of this licence

Hello Cheltenham Council Team

Cheltenham SEL

A Sexual Entertainment License SEL being a lawful activity gives accountability and the responsibility from the operators of a sexual entertainment venue. Provides a standard expected and working conditions adhered and practiced with the risk of performers and female staff avoided from sexploitation.

Cheltenham can't lose control of this activity when the horse race festivals come to town.

My full name and address is as follows:

I support to the granting
Your Faithfully

License Committee

A regulated SEL being a positive and unregulated a negative during the Cheltenham festivals. Lap dancing has taken place for many years and in more recent years been controlled.

The application for the SEL should be approved and controlled.

Licensing Cheltenham
Lap dancing

My self and my male partner have both gone to the lap dancing in Cheltenham, at the March festivals, not always going to the racecourse due cost of tickets and overpriced drinks but watching the races at one of the town centre bars soaking up the atmosphere the festivals bring to town.

Rejecting this legal and controlled form of entertainment, which I might add we both enjoy in March would lead to unground uncontrolled unregulated lap dancing with no rules.

In support of licensed lap dancing during the festival

Yours Sincerely

A regulated SEL being a positive and unregulated a negative during the Cheltenham festivals. Lap dancing has taken place for many years and in more recent years been controlled.

The application for the SEL should be approved and controlled.

Dear Sir/Madam,

Renewal of Licence for Sexual Entertainment Venue at 30 Cambray Place

My husband and I live in Cheltenham about 7miles from the application site. We visit Cheltenham town centre frequently and regularly for shopping, coffee, meeting up with family and friends and for other leisure activities. We are regular attendants at the Cambray Baptist Church and have been so for a great many years.

My husband and I object to the proposed license renewal for a Sexual Entertainment Venue (SEV) at this location on the following grounds.

1. The renewal application contradicts provisions in the current CBC Sexual Entertainment Policy

Statement in a number of areas. Firstly, it is inappropriate due to the presence of a place of worship (Sections 3.2(d) and 4.2(d)). Cambray Baptist Church is located directly opposite the SEV. Renewal of the SEV license is extremely insensitive to the Church and its ongoing/future/planned activities. If Cambray Baptist Church was not a Christian organisation but a mosque, we wonder if the Licencing Sub-Committee would still permit such liberal interpretation of their current policies when viewing/debating this application.

2. Cambray Baptist Church service is well attended by children each Sunday morning, as well as men and women of all age groups and of different nationalities. Evening Sunday services are regularly held at the church. Furthermore, the church building is used daily. Throughout the week Cambray Church holds meetings for church members, and events / outreach activities for kids, youths (aged 7-9 and 10-13), young adults, and pensioners. Hallowed Grounds, located at the church forecourt at Cambray Place, welcomes passers-by who are not church goers and offers them coffee, cake and a listening ear particularly to the more vulnerable members of our society.

3. Dropping off/picking up of users/visitors to Cambray Baptist Church at the Church's Rodney

Road back entrance is not practical. Rodney Road is a busy road with on-street parking on both sides and narrow uneven pavements. There is not enough parking for dropping off/picking up people attending church activities after dark. Cambray Place offers a better alternative as it is well lit and more spacious for church users waiting (on foot/in the car) to pick up and/or drop off their kids and other vulnerable persons at church events. We are concerned that the renewal of SEV licence at Cambray Place will continue to make the area in/around the church forecourt area intimidating and potentially unsafe (from a safeguarding perspective) after dark, making it easy for vulnerable young people to be

targeted, and potentially discriminating against any current/future church after dark/evening activities for children, women, young persons or families.

4. The renewal application also contradicts the current CBC Sexual Entertainment Policy Statement

due to the SEV's surrounding area being residential in character (Section 4.2(a)). Cambray Place is predominantly residential with some retail and commercial uses located closer to the pedestrianised High Street. Apart from Cambray Place, residential properties are also located on REF: Renewal of Licence for Sexual Entertainment Venue at 30 Cambray Place Selby Lodge, Cambray Court, and Wellington Street, all within easy walking distance from the application site. The proposal favours the SEV workers/users but is biased against women, kids, young children, young families, elderly and other vulnerable residents living in the vicinity of the SEV. Residents who want to walk to the High Street shops will have no choice but to walk past the SEV and its potential customers queueing or loitering around at Cambray Place most likely under the influence of alcohol or other abuse substances.

Based on the above, we urge the Licensing Sub-Committee to reject the proposed re-licencing of the SEV for the coming year.

Yours faithfully,

Cheltenham License Sections, Cheltenham Borough Council

Ref: Sexual Entertainment Renewal, Cambray Place GL50 1JP

Hello

I'm the managing director of Dragon-star Security Ltd based in Worcestershire. Supplying SIA trained security personnel to the Entertainment leisure and sporting industry throughout the UK.

Dragonstar Security has risk assessed the supplying of security personal to venues in Cheltenham with a full Sexual Entertainment Licence and venues operating under the exemption, a premises providing sexual entertainment on an infrequent basis. Therefore, do not need to offer the same level of safeguards to performers and patrons.

Red Apple Associates Ltd application to renew the SEL demonstrates transparency and open to scrutiny working in partnership with the Cheltenham borough Council and the stringent requirements a more effective approach to controlling and regulating opposed to the exemption option, removes the threat of sexual entertainment going underground in Cheltenham at race festival dates.

In my professional experience the granting of this application provides protection for all performers patrons and would maintain Cheltenham's reputation as a safe, diverse, vibrant well manage night-time economy.

I totally support the application from Red Apples Cambray Place Cheltenham. With the application for a renewal of a SEL

Regards

To whom it may concern,

I am writing to express that as representative of Cheltenham day and night safe, that I have no concerns or objections to Mr Steve Burrows having a SEV license for race week.

Mr Steve Burrows plays a very active part within Cheltenham safe attending all meetings and regularly meets with myself in the daytime and for when we work evenings visiting premises.

Mr Burrows is also part of our banning committee and is very supportive of its process.

As part of recommending safe spaces within Cheltenham and my experience of working alongside, Mr Burrows and how well he looks after his team I would recommend Mr Cambrays as a safe space for women for the nighttime economy.

I object to the licensing of this strip club particularly the licensing variation that ONLY prevents sexual contact/simulated sex in performance areas but NOT elsewhere.

I also call for an end to private booths – where sexual contact has already been observed in another strip club this same operator runs.

With 500 punters/night, much better surveillance is also clearly needed.

A frequency exemption loophole means 'occasional' lap dancing can take place during race weeks in unlicensed venues that the council cannot regulate. This means even licensed venues like this one can do as they chose or they will simply run as an unlicensed venue where the council has no legal powers.

It means you are unable to keep women safe or represent your tax paying residents while this exemption exists. Please redouble your efforts to call on Parliament to end it urgently.

Good Afternoon,

SEL application support

Working in a licensed premises at all times has only a positive attitude, my reasons for this is that there will be rules and regulations that need to be met to ensure the staff and public is safe. This is hugely important for those in this industry of work.

I strongly believe that everyone has the right to be safe at work, this should be in all types of work environments of which career path you take.

Therefore, if you choose to be a lap dancer for your choice of work, then working for a company who cooperates with the authorities deserves the rest for conducting themselves in a professional, legal with a responsible attitude.

Allowing performers and all the staff who work in Cheltenham during the festivals the support they deserve.

I would like to express my support in granting the SEV licence to Red Apple Associates. I have worked in security at a venue where Red Apple have had dancers & found them very professional in all aspects, with theyre main concern being the safety of the dancers.

Many of the dancers are trying to earn money to pay off student loans .I have chatted with the dancers & they have said they are the best in the business & everyone wants to dance for them, with a waiting list.

Yours faithfully

Myself and group of friends who are a mix of both male and female have attended Eroticats when out in Cheltenham's nightlife during race week.

Race week is an extremely busy week for Cheltenham and nightlife is at its busiest, something that is rare to see! As many people avoid town centre during this time, I do not. I choose Eroticats to attend, the atmosphere is brilliant.

I have attended a pop up lap dancing venue and it is not the same than attending a venue which holds its licence. Which is why I am in support to this application. It is a venue/entertainment the town wants.

Licensing Section

To whom this may concern

SEV clubs during the Cheltenham horse race events will take place with or without the guidance and control of the police. The granting of the SEV licence with the regular checking from the Cheltenham police ensures a good code of practice is maintained, and the welfare of all performers protected.

SIA FRONTLINE DOORSTAFF LICENCE HOLDER

License Committee

A regulated SEL being a positive and unregulated a negative during the Cheltenham festivals. Lap dancing has taken place for many years and in more recent years been controlled.

The application for the SEL should be approved and controlled.

Good afternoon Cheltenham licensing team,

The licensing of sexual entertainment in Cheltenham when the horse racing festival comes to Cheltenham has been in place for years without any evidence of bad behaviour of people who visit the lap dance club. I have personally witnessed more unacceptable behaviour during the day and early evening when Cheltenham town football club play at Whaddon Road, should we ban football with same argument of causing bad behaviour? Adults should be held responsible for their own behaviour, not the football, horse racing, or lap dancing industries.

A Sexual entertainment license with the police and the people of Cheltenham knowing where they are located for the week would be the better option to the pop up clubs. Which without doubt return to Cheltenham for March.

Lap Dancing clubs are used unfairly as a scape goat for the bad behaviour and domestic violence towards women. There were more reports of violence and domestic violence toward women during covid.

I support the granting.

Good Afternoon

Me and my friends have attended Eroticats venues on a night out during Cheltenham Festival Race Meetings.

The venue is full of people who are enjoying an evening out on the busiest week for Cheltenham! Eroticats host a fun and safe evening for everyone.

There is a demand for this type of venue and having a venue which has a licence is less of a concern than one that does not!

I am fully supporting another application for this event!

I object to the licensing of this strip club particularly the licensing variation that ONLY prevents sexual contact/simulated sex in performance areas but NOT elsewhere.

I also call for an end to private booths – where sexual contact has already been observed in another strip club this same operator runs.

With 500 punters/night, much better surveillance is also clearly needed.

A frequency exemption loophole means 'occasional' lap dancing can take place during race weeks in unlicensed venues that the council cannot regulate. This means even licensed venues like this one can do as they chose or they will simply run as an unlicensed venue where the council has no legal powers.

It means you are unable to keep women safe or represent your tax paying residents while this exemption exists. Please redouble your efforts to call on Parliament to end it urgently.

As a visitor to Cheltenham races I object to the licensing of this strip club particularly the licensing variation that now ONLY prevents sexual contact/simulated sex in performance areas but NOT elsewhere.

I also call for an end to its private booths – sexual contact has already been observed in the private booths at another strip club run by the same operator.

With 500 punters/night, much better, fully independent, surveillance is clearly also needed.

I understand that a frequency exemption loop hole means 'occasional' lap dancing may legally happen during race weeks in totally unlicensed venues that the council has no powers whatsoever to regulate. This not only forces the council's hand to license strip clubs but means even licensed venues like this can (and do) basically as they chose. Even if they are then denied a license in future, they simply set up as an unlicensed venue where the council has zero legal powers.

You are unable to keep women safe while this exemption exists. Please re double efforts to call on Parliament to close it now.

I object to the licensing of this strip club particularly the licensing variation that ONLY prevents sexual contact/simulated sex in performance areas but NOT elsewhere.

I also call for an end to private booths – where sexual contact has already been observed in another strip club this same operator runs.

With 500 punters per night, much better surveillance is also clearly needed.

A frequency exemption loophole means ‘occasional’ lap dancing can take place during race weeks in unlicensed venues that the council cannot regulate. This means even licensed venues like this one can do as they chose or they will simply run as an unlicensed venue where the council has no legal powers.

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It means you are unable to keep women safe or represent your tax paying residents while this exemption exists. Please redouble your efforts to call on Parliament to end it urgently.

Dear Sir/Madam,

I am emailing my **very strong objection** to the above application.

1) The position of such a venue is totally inappropriate. It is in a main, elegant and very busy part of our "heritage" town of which we must remain proud. It is not in a part of the town where there should be any hint of sleaze.

- 2) It is a very busy thoroughfare with women, children and young people passing by
- 3) It is within metres of a thriving Place of Worship where many evening activities are held for young people and children as well as for adults.

Politicians, the media and many organisations are at this time being made very aware, with extensive proof, of the worsening of men and boy's attitude, behaviour and respect for the female sex. Much is being discussed about how to address this increase in misogyny and abuse.

Can you honestly accept this application with a clear, moral conscience that it is not encouraging this serious downturn of behaviour?

A very concerned Cheltenham resident

Dear Sir/Madam,

I object to the licensing of this strip club particularly the licensing variation that ONLY prevents sexual contact/simulated sex in performance areas but NOT elsewhere.

I also call for an end to private booths – where sexual contact has already been observed in another strip club this same operator runs.

With 500 punters/night, much better surveillance is also clearly needed.

A frequency exemption loophole means 'occasional' lap dancing can take place during race weeks in unlicensed venues that the council cannot regulate. This means even licensed venues like this one can do as they chose or they will simply run as an unlicensed venue where the council has no legal powers.

It means you are unable to keep women safe or represent your tax paying residents while this exemption exists. Please redouble your efforts to call on Parliament to end it urgently.

Yours faithfully,

Councillors

Licence renewal application

The application for a sexual entertainment licence strip club to coincide with Cheltenham race days October, November, December, January, March, April and May during Cheltenham race days. A SEL venue is always busy on the Cheltenham race days if not the busiest venue in the town.

A SEL venue previously based at the 2 Pigs in Church Street, operating under the exemption 2010 and then with the SEL from 2017 and more recently, 30 Cambray Place without any reports of anti-social behaviour or violence towards women and fighting between large groups of men a far different story from other venues in the town centre on race days. Lap dancing is a lawful form of entertainment which comes under a lot of scrutiny every year from the media coverage and scaremongering from people with their own motivated agenda, the accreditation of the purple flag speaks for itself.

Cheltenham race days. SEL venues working with the Cheltenham licensing and police with the increased population and women safety having worked previously. why change a winning formula

Supportive of a winning formula with safety of the Cheltenham residents and racing fraternity

To whom it may concern,

I'm repeating my support for a licensed sexual entertainment club.

Having worked for Mr Steven Burrows over the past 5 years as a receptionist at the lap dancing during March and November Cheltenham Festivals. I would like to give my full support for the new application for a lap dancing club.

Having worked at other venues during the Cheltenham festival, I would not work for any other club or bar after working for Steven at his lap dancing club. The support and care he showed me and all the girls and dancing, not tolerating any bad behaviour from any customers towards any of his staff. This does not happen very often at many clubs.

I can honestly say I enjoy working even though it can be a long night. Transport too and from the club, which I had never experienced at any club or bar in Cheltenham before. Waiting for an expensive taxi that might not even turn up! May be some of the other owners of managers should be encouraged to follow his lead, with the car he shows to his staff as a responsible employer.

I would appreciate you considering the granting of his application for a well-run club. The alternative is a not so well-run club, by a not so responsible person.

Licensing Committee

Red Apple Company, 30 Cambray place, Cheltenham

Lap dancing in Cheltenham has taken place for many years with the same objectors on each SEL application. Claiming several different reasons. When the truth is they don't simply agree with lap dancing on moral grounds.

Red Apple recognizing the market for lap dancing during race festival dates in Cheltenham and now operating successfully for more than 15 years with more than 8/9 years with an SEL. Forming a working relationship with the local authorities providing safe working conditions for all employees and the Eroticats dancers.

The refusal of a licence could see the opening of underground clubs and the increase of clubs operating under the exemption rule which has no restrictions and can run be persons, from who knows where?

If Cheltenham has the purple flag, it shows something is working.

Keep up the good work and grant the SEL.

I am the former premises licence holder for Aquavitae / 21 Club, 10 Ormond Pl, Cheltenham GL50 1JD and previous SIA door supervisor licence and active former member of the Cheltenham Night-Safe scheme.

Mr Steven Burrow/ Eroticats SEL application. Having a working knowledge of Eroticats, I would support the granting of the licence which I believe to be beneficial to Cheltenham during March 2025.

I support Mr Burrows application for his commitment towards Cheltenham's night-time economy and its continued existence, his foresight to adapt in an industry which grows small every year. Also, Steven Burrows who is a very experienced SEV operator working in Cheltenham for many years. He has a working knowledge of applying health and safety to create a safe environment for all which I have witnessed as a licensee.

Alongside their experience and professionalism, their ongoing efforts help to reaffirm Cheltenham's purple flag accreditation as a safe town throughout the year and March. They continue to work closely with Cheltenham borough council which has generated a proven model of sustainability and growth.

I understand not everyone agrees with Sexual entertainment in Cheltenham. However, the health and safety of visitors to Cheltenham and the dancers should supersede objections on the ground of morality, as being only for 4 days.

I would like to support the proposed SEV application Under the Prom, GL50 1NW

Good evening,

I am continuing to support the application for SEL.

As a female who attends Cheltenham town centre during the race festivals for most meets, I would feel safer attending a venue which has a licence rather than an unlicensed venue.

Please take my constant support in to consideration along with my email.

Many thanks

EMAIL TO SUPPORT SEXUAL ENTERTAINMENT VENUE

Attending a licensed premises or attending a non licensed premises? I know which I would prefer to.

I have a group of female and male friends who have all visited Eroticats, I have nothing negative to say. We all look forward to attending the venue it is on our list of venues to attend each year!

Dear Sir/Madam,

The reason for my email this afternoon is to give my letter of support for the SEL in Cheltenham,

I attend nightclubs during the Cheltenham festival, including Cambray Place.

Being a female who attends this nightclub, I'd like to attend while there is a licence in play for this event. To my understanding this means that they are abiding by all rules and regulations needed for this event.

Kind regards

Dear licensing committee,

The reason for my email is to share my support for Eroticats in Cheltenham.

As a woman I believe that Eroticats gives a huge job opportunity for those who wish to work as dancers. When choosing your career you have to do what you enjoy and what benefits your life style, being a dancer you can earn your money while doing something you enjoy! But many people may not agree with this choice of work, why does that mean that it makes it harder to work in a licensed premises? Working in a licensed premises means that as a dancer you are working in a venue which is safe for the public and staff.

Regards

Licensing Section Cheltenham

SIA licence holder in support of SEL application GL50 1JP

I have worked in the security industry for most of my adult working life. Now working as the area manager for one of UK's leading Security companies. In recent years employed at Prestbury Park and various night clubs in Cheltenham town centre especially at the Cheltenham race events.

A sexual entertainment licence with all conditions and restrictions put in place by yourselves for March and November race events and any other events 2025 give a positive action.

I'm a very experienced SIA licence holder convinced having work in licensed and the pop-up style sexual entertainment venues in Cheltenham.

A regulated sexual entertainment licence the correct course of action and highly reduces the risk to customers and the safety of all member's staff

Regulated + Positive

Unregulated + Negative

Underground + Dangerous

Hello Committee,

Supportive email

I repeat my email of support for a licensed venue. The majority of Cheltenham know the need for lap dancing in the town at festivals when Cheltenham is overwhelmed with the tweed & trilby hat brigade. Lap dancing is lawful activity but not to everyone one's taste of entertainment on the grounds morally. With a common-sense approach toward Cheltenham lap dancing during the Gold Cup and November Meeting and possibly some of the smaller race calendar events. If you like or dislike lap dancing. it can take place for a 24-hour period at any venue anywhere with no rules, with yourselves and the police unaware and unprepared, with knowledge being power.

The solution is to use the knowledge with the control and grant the licence on the Cheltenham festivals. However, I don't believe there is a call for a lap dancing club at other periods of the year.

Hello Cheltenham committee, I have been informed on my social media a lap dance application renewal been applied for and have now read the application, to which I express my support with this email. With reference regarding previous emails of support, I have requested I'm sent notifications! Having received information persons objecting receive this

courtesy. I support licenced sexual entertainment during the race festivals, this has taken place for many years without any evidence causing domestic violence towards women in Cheltenham. Being under the control of the council rules provides any gender the safe protection from any criminal deception and the performers the safe working environment and taken advantage by any untrustworthy promoters. I would urge the granting of a sexual entertainment licence in Cheltenham at the festivals 2025.

I am the CEO ITUS Risk Group Ltd and wholeheartedly support the application for the SEL for the venue and its owners.

The purple flag awarded to Cheltenham indicates an entertaining, diverse, safe and enjoyable night out, including the Cheltenham Gold Cup festival the first major British horse racing event in the race calendar with the attendance more than doubling Cheltenham town's population together with the explosion on the nighttime economy. Gloucestershire police constabulary raising to the challenge with limited resources. An SEL enables the Gloucestershire constabulary to work with Partners and sexual entertainment and using their resource's maintaining the safety of the public during the Gold Cup festival, March 2024 being the perfect example.

Previous debates and hearing on SEL in Cheltenham, Cheltenham borough Council licensing section decisions have been made difficult with criticism of the committees and granting an SEL. The former Cheltenham MP Alex Chalk and the GPCC Chris Nelson using the media for their own Political gain.

Regulating & control of SEL prevents the exploitation of all who visit Cheltenham, I support this application, as only for limited number of days!

Cheltenham Licensing Team

Public notice 30 Cambray Place

Most Cheltenham people are supportive of the controlling of the sex entertainment when the racing is on in Cheltenham. We all understand the need for this entertainment if only being at the bigger festival's A controlled club is far more desirable to poorly run pop-up strip clubs in days gone by having visited both.

I object to the licensing of this strip club particularly the licensing variation that ONLY prevents sexual contact/simulated sex in performance areas but NOT elsewhere.

I also call for an end to private booths – where sexual contact has already been observed in another strip club this same operator runs.

With 500 punters/night, much better surveillance is also clearly needed.

A frequency exemption loophole means 'occasional' lap dancing can take place during race weeks in unlicensed venues that the council cannot regulate. This means even licensed venues like this one can do as they chose or they will simply run as an unlicensed venue where the council has no legal powers.

It means you are unable to keep women safe or represent your tax paying residents while this exemption exists. Please redouble your efforts to call on Parliament to end it urgently.

I object to the licensing of this strip club particularly the licensing variation that ONLY prevents sexual contact/simulated sex in performance areas but NOT elsewhere.

I also call for an end to private booths – where sexual contact has already been observed in another strip club this same operator runs.

With 500 punters/night, much better surveillance is also clearly needed.

A frequency exemption loophole means 'occasional' lap dancing can take place during race weeks in unlicensed venues that the council cannot regulate. This means even licensed venues like this one can do as they chose or they will simply run as an unlicensed venue where the council has no legal powers.

It means you are unable to keep women safe or represent your tax paying residents while this exemption exists. Please redouble your efforts to call on Parliament to end it urgently.

SEV Licence Application - 24/01577/SEXA

We are writing on behalf of our members to object to the renewal Sexual Entertainment Venue application submitted by Red Apple Associates Ltd, trading as 'Eroticats' ('the Applicant') to allow for stripping at Jessop House, 30 Cambray Place, Cheltenham to coincide with race meets at Cheltenham Racecourse throughout the year.

Impact on the lives of women and girls

Strip and lap dancing clubs - where women are sexually objectified and the idea that men are entitled to access women's bodies is reinforced - contribute to harmful sexist and misogynistic attitudes that underpin the endemic abuse, harassment and violence against women and girls in society. Recent research carried out by the National Police Chief's Council has described the scale of men's violence against women and girls as an 'epidemic' and a 'national emergency'.¹

There are a number of research studies, as well as research carried out by the United Nations and our own government, that show the link between harmful attitudes, a culture that perpetuates and reinforces these messages and the perpetration of sexual violence. Please see the 'Safe and Equal Bristol Report: Sexual Entertainment Venue Policy Review' 2021 for details of this research.²

Plan International's recent 'The State of Girls' Rights in the UK Report' (July 2024) made for bleak reading³. 93% of girls and young women do not feel "completely safe" in public spaces. For girls and young women in Cheltenham, violence and harassment is a particular issue.

The most recent Cheltenham Borough Council VAWG Safety Survey highlighted that only 5% of respondents felt "very safe", with around 68% of respondents feeling "not very" safe in Cheltenham during race week.

We know from our own research that women change what they usually do in Cheltenham during race week, with many avoiding the town centre. Women have told us of routine harassment from drunk men, their experiences of fear and powerlessness and feeling 'like an object just for men's amusement'.

3 Plan International - The State of Girls' Rights In the UK Report 2024 -

<https://plan-uk.org/state-of-girls-rights>

2 Safe and Equal Bristol Report: Sexual Entertainment Venue Policy Review 2021 -

(<https://www.bristolwomensvoice.org.uk/wp-content/uploads/2021/11/SEVReport2021FINAL.pdf>)

1 <https://news.npcc.police.uk/releases/call-to-action-as-violence-against-women-and-girls-epidemic-depens-1>

Others complained about the Sexual Entertainment Venues (SEVs) stating that, 'Turning the pubs into strip clubs again only reinforces objectifying women' and 'The SEVs make the atmosphere really unpleasant and unsafe for women.'

A culture where sexual harassment is unacceptable cannot be created when Cheltenham Borough Council ('CBC') enables the continued sexual objectification and dehumanisation of women and girls by way of SEVs.

We would remind CBC it must take into account its statutory duties under the Public Sector Equality Duty in its decision making and have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Race Week 2024 - Licensing Breaches

We understand that during race week in March 2024, breaches of SEV policy standard conditions 18 and 25 (touching between performers and between customers and performers) were identified during inspections at another venue operated by the Applicant, which resulted in a written warning being issued by the police.

We are concerned that, despite reassurances given by the Applicant that performance areas are constantly monitored by 'booth walkers', breaches of licensing conditions have occurred that may have harmed women performing in the venue and increased risk for other women working there.

We are extremely concerned, given the breaches that occurred in March, that the Applicant has requested a variation to standard condition 25 to read as follows:

Any bodily contact between entertainers or performers or any movement that indicates sexual activity or simulated sex between entertainers or performers is strictly forbidden in the performance area.

This suggests that the Applicant is seeking permission for performers to simulate sexual acts in non performance areas. This could put the women performing in the venue at an increased risk of harassment and/or assault in areas of the venue which may not be actively monitored. If a SEV licence is granted, we would ask that this variation of the standard conditions is not permitted. Additionally, we would ask that performances in booths are not permitted, to ensure that performance areas can be better supervised.

Frequency Exemption

We are told that CBC's hands are tied in respect of the grant of SEV licences, due to the existence of the sexual entertainment frequency exemption as enacted by Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982. Legislation does allow for these provisions to be repealed and we would hope that CBC will use whatever influence it has to lobby Parliament for such a change. We hope that CBC recognises the barrier that the frequency exemption's continued operation creates in respect of the exercise of local democracy.

If CBC continues to grant SEV licences then they must be licenced on the strictest terms possible. Over the time we have engaged in the SEV licensing process, we have seen a consistent watering down of CBC's SEV policy standard conditions (which were agreed in consultation with local people) in areas such as advertising, soliciting and operating hours - with scant evidence to justify such changes.

We hope that CBC will listen to the voices of women and girls and show a commitment to their Public Sector Equality Duty in deciding the outcome of this application.

Yours faithfully

Gloucestershire Women's Liberation Collective (GlosWomen)

I object to the licensing of this strip club particularly the licensing variation that now ONLY prevents sexual contact/simulated sex in performance areas but NOT elsewhere.

I also call for an end to its private booths – sexual contact has already been observed in the private booths at another strip club run by the same operator.

With 500 punters/night, much better, fully independent, surveillance is clearly also needed. I understand that a frequency exemption loop hole means 'occasional' lap dancing may legally happen during race weeks in totally unlicensed venues that the council has no powers whatsoever to regulate. This not only forces the council's hand to license strip clubs but means even licensed venues like this can (and do) basically as they chose. Even if they are then denied a license in future, they simply set up as an unlicensed venue where the council has zero legal powers.

You are unable to keep women safe or represent your tax paying residents while this exemption exists. Please re double efforts to call on Parliament to close it now.

Licensing Section, Cheltenham Borough Council

Ref; Red Apple Associates Ltd, Sexual entertainment licence renewal

Gloucestershire Live article 17th September 2024

· **"Whilst legislation allows for objectification of women, for the gratification of some men"** Is the DREAMBOYS at the Cheltenham town hall on November 6th, 2024, then not the objectification of men for the sexual gratification of some women?

· **"69 per cent in the most recent survey. We know that during race weeks women change their behaviour, this is unacceptable"**. Most Cheltenham resident's women and men change their behaviour avoiding Cheltenham town centre in March. Cheltenham Monday to Friday the nighttime economy throughout the year is very quiet many businesses choosing not to open or close early.

· **"Outside of race weeks there is no demand for lap dancing in Cheltenham, there are no venues that operate permanently"**. No demand reason for the absence of an SEL on a permanent basis, application applied for on festival dates & times.

· **"However, the existence of the frequency exemption, which enables venues to operate without a licence or any regulatory control, means that the venues can operate regardless of decisions made by a licensing"** SEL being the answer to the exemption regarding SEL in Cheltenham.

· **"But more and more people have become more upset about it even though there has been no campaigning. Nobody is drumming up opposition against it but it's rising nonetheless."** This simply not true! with more people supporting a sensible approach due to the constant media campaign regarding lap dancing in Cheltenham during the Cheltenham festivals

A licence renewal granted over the Cheltenham during any racing festivals, with all the restrictions & conditions imposed by the committee provides visitors who chose to attend entertainment of this nature and performers the protection from exploitation and the safe working environment they rightly deserve.

I would urge the health and safety of all performers and members of the public attending a sexual entertainment venue be considered with the granting of this licence renewal application.

Regards

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