

# Cheltenham Borough Council

## Full Licensing Committee

**Meeting date:** 3 December 2025

**Meeting time:** 5.00 pm

**Meeting venue:** Council Chamber - Municipal Offices

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### **Membership:**

Councillor Dr David Willingham, Councillor Angie Boyes (Vice-Chair), Councillor Dilys Barrell, Councillor Steve Harvey, Councillor Tabi Joy, Councillor Dr Helen Pemberton, Councillor Julie Sankey, Councillor Dr Steve Steinhardt, Councillor Simon Wheeler (Chair) and Councillor Barbara Clark

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

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**Contact:** [democraticservices@cheltenham.gov.uk](mailto:democraticservices@cheltenham.gov.uk)  
**Phone:** 01242 264 130

# Agenda

## **1 Apologies**

## **2 Declarations of interest**

## **3 Minutes of sub-committee meetings (Pages 5 - 24)**

To approve the minutes of the meetings of the Licensing Sub Committee Alcohol and Gambling held on 1<sup>st</sup> October and 27<sup>th</sup> October.

To approve the minutes of the meetings of the Licensing Miscellaneous Committee held on 1<sup>st</sup> October and 5<sup>th</sup> November.

## **4 Renewal of the Sexual Entertainment Venue Licence (Pages 25 - 78)**

## **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 79 - 90)**

## **7 Review of a Private Hire Drivers Licence (Pages 91 - 102)**

## **8 Seating Capacity of a Hackney Carriage Vehicle (Pages 103 - 118)**

## **9 Application to Renew a Private Hire Drivers Licence (Pages 119 - 220)**

## **10 Review of previous decisions**

## **11 Any other items the Chairman determines urgent and requires a decision**

## **12 Date of next meeting**

The next meeting will be held on the 4<sup>th</sup> March 2026.

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# Cheltenham Borough Council

## Licensing Sub Committee-Alcohol and Gambling

### Minutes

**Meeting date:** 1 October 2025

**Meeting time:** 4.00 pm - 5.15 pm

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**In attendance:**

**Councillors:**

Dilys Barrell, Dr Steve Steinhardt and Simon Wheeler

**Also in attendance:**

Michelle Bignell (Licensing and Public Protection Manager), Vikki Fennell (Senior Lawyer, One Legal), Craig Daly and Jacob Doleman (Licensing Officer)

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#### 1 Election of Chair

Councillor Wheeler was elected Chair of the committee.

#### 2 Declarations of interest

There were none.

#### 3 Determination of a New Application for a Premises Licence

The Licensing Officer introduced the report as published.

The responses to Member questions to the Licensing Officer were as follows:

- There are no other premises in the area that are open 24 hours – with Sainsburys and Tesco both being closed by 11pm.
- Sale of other goods is already permissible from the premises. There are no other 24 hour places in the local area.

The objector then had the opportunity to ask the Licensing Officer and the responses were as follows:

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- The objector was informed that Tesco is not a 24 hour store.
- The decision that was before the committee had not yet been made, that was why the committee was taking place.

The applicant had no questions for the Licensing Officer.

The objectors were then given the opportunity to address the committee and made the following points:

- Lived in the area for 40 years and there has been an increase in noise and vandalism that comes from Tesco being open from 6am – 11pm.
- Tesco opening times mean that they only get 7 hours peace at the moment and if this application goes through then there will be no peace.
- There have been cases of littering and urination in the driveway and the fear is that this will increase if the shop does get extended hours to sell alcohol.
- Although the report says that alcohol will not be sold to intoxicated people the concern is that this will happen as you cannot always tell how intoxicated a person is.
- There was a concern with regard to customers visiting the shop throughout the night and slamming doors making noise.
- The lights that are there already are so bright that they shine into the bedroom, they look like floodlights.
- There was a concern that selling alcohol 24 hours will encourage drunk drivers.

The Licensing Officer stated that traffic is not a licensing concern but is a planning issue. It was confirmed that only noise relating to the sale of alcohol can be considered. It was also confirmed that light nuisance falls under the environmental protection department.

Members were then given the opportunity to ask the objectors questions, the responses were as follows:

- The objectors live directly opposite the premises.

The applicant was then given the opportunity to address the committee and made the following points:

- This is not the only shop in the UK that will ask for a 24 hour licence.
- He is trying to take the opportunity that the country has given him and make the most of the premises.
- He has a planning application in at the moment for the lighting.
- There will be no deliveries at night and there is parking at the back of the property so that should minimise noise.
- He is hoping to install speakers like a petrol station so that should minimise noise.
- The applicant has had a business for 13 years and has never served drunk people and has no intention of starting now.
- He is very proud of the business and what they do, he does not want to cause any unnecessary upset to the neighbouring residents.

The responses to Member questions to the applicant were as follows:

- There is limited parking at the site so that should reduce noise.
- There is always a member of staff on the premises.
- Only one person can be served at the hatch at any one time.

- There is no trained security guard on the premises.
- The applicant stated that he sees a 24 operation as an opportunity to expand and to see if it is actually worth expanding.
- He might not be open 24 hours all the time, maybe just when the festivals are on.
- By asking for an alcohol licence he is doing his best to please his customers who visit the shop after a night shift to buy groceries and also wish to add a bottle of wine to their purchases.

The applicant was then given the final right to reply, he made the following comments:

- He would appreciate the opportunity to expand the business.
- He wants to do something that will make him stand out from his competitors.
- He does not wish to make life difficult for the neighbours or other residents.
- He is just trying to do his best for his family and make a difference to their lives.

The Members then retired to make their decision as follows:

At the hearing, the Sub-Committee heard from the licensing officer, objectors and the applicant.

In coming to its decision, the Sub-Committee had due regard to all relevant legislative provisions including:-

- The Licensing Act 2003 which confers the powers of the Licensing Authority to deal with the application
- The obligation to promote the four licensing objectives
- The relevant sections of the Council's Statement of Licensing Policy and Statutory Guidance.

The Licensing Sub-Committee noted it must carry out its functions with a view to promoting the four licensing objectives, set out in the 2003 Act.

The Sub-Committee was aware it cannot take into account representations which do not relate to one or more of those licensing objectives and acknowledges representations which are taken into account must be relevant and evidenced-based.

The Sub-Committee considered all relevant verbal and written submissions from the Applicant, objectors and licensing officer before making its decision on the application.

In deciding the application, the Sub-Committee noted no objections had been raised by the responsible authorities but the Sub Committee did note the comment of Environmental Health that noise would be intrusive at night.

The council policy states that licensable activities carried on within the core hours of 09:00-23:00 will generally not have a harmful impact on the licensing objective, address the concerns raised by local residents.

The policy vision statement of the council is to promote the policy by having less focus on alcohol and protecting the quality of life of residents.

The business is not within the core business area and is in a purely residential area and the reason behind the application is money motivated and the Sub Committee does not see that as a good enough reason to deviate from its policy.

The Sub Committee therefore by a unanimous decision decided to reject the application as requested.

All parties are reminded there is a right of appeal against the Licensing Authority's decision pursuant to Section 181 of and Schedule 5 to the Licensing Act 2003. An appeal must be made to the Magistrates' Court and commenced within 21 days of notification of the Authority's decision.

The Sub committee wishes the applicant well in the new business and reminds him that he is permitted to open 24/7 but not to sell alcohol during the hours of 23:00 – 06:00

**4 Any other items the Chairman determines to be urgent and which requires a decision**

There were none.



# **Cheltenham Borough Council Licensing Sub Committee-Alcohol and Gambling Minutes**

**Meeting date:** 27 October 2025

**Meeting time:** 4.00 pm - 5.45 pm

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**In attendance:**

**Councillors:**

Dilys Barrell, Dr Helen Pemberton and Simon Wheeler

**Also in attendance:**

Vikki Fennell (Senior Lawyer, One Legal) and Jacob Doleman (Licensing Officer)

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## **1 Election of Chair**

Cllr Wheeler was elected as Chair of the committee.

## **2 Apologies**

There were none.

## **3 Declarations of interest**

There were none.

## **4 Determination of a New Application for a Premises Licence**

The Licensing Officer introduced the report as published.

The response to a Member question was that the times that were on the original application had been changed due to input from Environmental Health.

The objectors addressed the committee and made the following points:

- The owner of 15 Royal Crescent explained that the property has been in the family for 60 years and at the rear of the property were 6 former garages, that were given planning permission for business starter units, this application is for one of those properties.
- The main issue of concern was that there is pedestrian and vehicle access over the land concerned and across the courtyard, the building is made up of both commercial and residential units and access is used 7 days a week.
- The proposed seating area is in the right of way area.
- It can not be safe to have seating on a right of way.
- Disorder is also a consideration that should be considered as if there is a crowd and who have been drinking the noise level for both the residential and businesses could cause a problem.
- Safety of children is also an issue. With the Coffee Pod at the moment people have to move their chairs to allow vehicles on to the site. Children are often in the courtyard area with their parents and that is a safety risk.

The Chair explained to the objector that although the committee was sympathetic with what he said, these are mostly planning matters and not for the licensing committee to consider.

- The next objector to address the committee explaining that she was a tenant of the property who runs a community interest company for children experiencing trauma.
- As a mental health service it is vital for their clientele that they operate in a calm, quiet and confidential environment.
- They carried out due diligence when they were looking for a suitable property.
- If the licence is granted the hours of operation that are being requested will be incompatible with their sessions.
- The outside area is a private road not a courtyard or outdoor venue, the access road can be used 24 hours a day, it is their emergency egress and serves as the main entrance to the residential flat.
- Their entire organisation supports children with trauma, permitting alcohol sales and the associated entertainment can be triggering or provoking, this also applies to unsuitable music lyrics and films.
- Their operating hours are 8-6 and granting the hours that the applicant has applied for will undermine the protection from harm objective.
- There was a concern that conversations in the building could be overheard from the proposed area, which would breach confidentiality as there is no double glazing (due to the building being a listed building).
- There are already concerns with regard to safety in the area and it is badly lit. There has already been problems with litter and drug paraphernalia, alcohol would increase this risk.
- Mixing vehicles and the public is not safe, the area is not suitable for alcohol led activities.
- Confidentiality issues could cause the service to close, loss of the service could be devastating and would not be in the public interest.

The matter then went to Member questions, to the objector the responses were as follows:

- Occasionally there have been problems with the Coffee Pod customers, in that people let their children play around the cars and their noise can disrupt

sessions with their clients. Anyone talking outside can be heard clearly, adding alcohol could make the problem worse.

- Any drug paraphernalia or beer bottles they just clear up, they do not report it to the police.

The Applicant then had the opportunity to address the committee and made the following points:

- He stated that he is the husband of a person who specialises in mental health and has no desire to cause any disruption to the service in Royal Crescent.
- He purchased the Tavern to make into a community space and is doing what he can to do that, they hold regular lunches for a local old peoples home and regularly host ladies who lunch.
- The Tavern is a small pub with no outdoor space by having this space it will hopefully improve revenue, particularly through the summer months.
- They wish to work collaboratively with the business and residents in Royal Crescent, they are happy to look at what they can concede from the original application.
- Four Cats cocktail bar operated from a unit for 3 years and there is no knowledge of any issues caused there.
- The tables and chairs are a good 10 metres away from the building.
- They do not want to show films or play music during the day, however they do partner with Cheltenham Festivals and would still like to have around an hour of jazz and other music during the 2 festivals.
- It is not a traditional pub it is more of a restaurant, they want drinkers in after 9.30 pm not in the day.
- Their typical demographic is 35-70, the only time this changes is during race week.
- They are not looking to attract the student market, they offer 20% off food Monday – Wednesday to bring people into the venue.
- Happy to do whatever is required to make sure that the counselling business is not effected. They are working with the coffee pod too, they won't be selling coffee.
- He hopes that their approach will be a collaborative one and that everyone can work together.
- The business is losing large amounts of money every month, they are building business by having a good food offer, however they need an easy way to build revenue during the summer and this seems like a solution.
- When he became the owner of the Tavern he removed all the TV's to make it a more enjoyable space, they want to attract families.

The responses to questions from the objectors were as follows:

- The applicant has sacked his old manager and he and his business partner have parted company.
- There is no reason to have music outside for the diners.
- Although it was applied for he only wants to serve food and alcohol in the space. The space would be more used at the weekend, the lunchtime trade is not alcohol based.
- The applicant will make their space more inviting so that there is no need for their customers to encroach on other areas in the vicinity.
- They are going to use the chairs and the tables that belong to the coffee pod after they close.

Prior to Member questions the licensing officer explained that Members could attach non-standard timings to the licence eg for the Festivals weeks and Members were told what they could do within the terms of the legislation.

The matter then went to Member questions, of which there were none.

The Members then retired to debate and to make their decision which was as follows:

Having considered the application; the evidence provided; the representations made by all parties, including those made at the hearing and the written representations; the provisions of the Licensing Act 2003, the obligation to promote the four licensing objectives; the relevant sections of the Council's Statement of Licensing Policy and the Statutory Guidance it was resolved that the premises licence be GRANTED SUBJECT TO MODIFIED CONDITIONS including those agreed with Environmental Health Authority being added to the licence.

- The performance of film will be excluded from the licence as agreed with the applicant
- There will no live music save for every Friday and Saturday between 18:00 – 22:30 hours
- In relation to all racing festivals in the Cheltenham race calendar live music is permitted any day between the hours of 18:00 and 22:30
- In relation to the Jazz festival and the music festival live music is permitted on up to three occasions on each of those weeks with a months written notice to the licensing authority of the timings requested

The Sub-committee found the applicant to be very open and honest and prepared to concede numerous points of his application to work with businesses around him at the meeting today.

The Applicant has moved his position to try and respond to those objections raised today

The Sub-committee has no jurisdiction over the use of the drive way and parking area, this is not something the sub-committee can be involved in

The location is a town centre core area, there are other public houses within metres of the venue, it is already a very busy area therefore it would not be reasonable to refuse on that ground.

Sub committee deem him to be a responsible applicant based on what they have seen and heard this evening.

Environmental Health are the relevant responsible authority and it is them that can monitor if there are issues. If issues arise then it is, open for the licence to be called in to review.

It is a single small business not a big chain moving in.

The Sub-committee understand the objections raised but hopes that the concessions offered this evening have alleviated some of the concerns.

All parties were reminded that there is a right of appeal within 21 days for anyone dissatisfied with the decision

The residents were reminded that there is a right of review should there be any issues once the business is up and running.

**Unanimous decision to grant.**

**5 Any other items the Chairman determines to be urgent and which requires a decision**

There were none.

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# **Cheltenham Borough Council Licensing Sub-Committee - Miscellaneous Minutes**

**Meeting date:** 1 October 2025

**Meeting time:** 6.00 pm - 9.10 pm

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**In attendance:**

**Councillors:**

Angie Boyes, Dr Helen Pemberton, Julie Sankey and Simon Wheeler

**Also in attendance:**

Michelle Bignell (Licensing and Public Protection Manager), Vikki Fennell (Senior Lawyer, One Legal), Jacob Doleman (Licensing Officer) and Jake Johnston (Senior Licensing Officer)

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## **1 Apologies**

Apologies were received from Councillor Willingham.

## **2 Declarations of Interest**

Councillor Sankey declared that she works for Child Social Services but she had no knowledge of item number 7.

## **3 Public Question**

The questioner was not present but had received the response to his question.

## **4 Local Government Act 1972**

The Chair read the following statement and Members voted unanimously to enter exempt session.

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

### **5 Review of a hackney carriage driver's licence**

The Licensing Officer introduced the report as published and answered Members' questions.

The driver's representative addressed the committee and responded to Members' questions.

Following debate in closed session, Members voted to issue a written warning and a requirement that the driver undertake a training course run by Reed.co.uk (Course 1 and Course 4 ) or similar on car maintenance and driver safety and road safety law within 3 months and provide a copy of the certificates to the licensing authority.

### **6 Review of a hackney carriage driver's licence**

The Licensing Officer introduced the report as published.

The driver addressed the committee and responded to Members' questions.

Following debate in closed session, Members voted to suspend the driver's license with immediate effect on the grounds of public safety and defer until the next committee for him to seek legal representation.

### **7 Review of a Hackney Carriage Driver's Licence**

The Licensing Officer introduced the report as published and responded to Members' questions.

Officers from the County Council responded to Members' questions.

The driver addressed the committee and responded to Members' questions.

Following Members' debate, which took place in front of the driver and the GCC officers, Members voted that no further action should be taken.



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

There were none.

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# **Cheltenham Borough Council Licensing Sub-Committee - Miscellaneous Minutes**

**Meeting date:** 5 November 2025

**Meeting** 18:00 – 19:40

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**In attendance:**

**Councillors:**

Angie Boyes, Dr Helen Pemberton, Julie Sankey, Simon Wheeler and Dr Steve Steinhardt

**Also in attendance:**

Michelle Bignell (Licensing and Public Protection Manager) and Vikki Fennell (Senior Lawyer, One Legal)

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## **1 Apologies**

Apologies were received from Councillor Willingham, Councillor Steinhardt substituted for him.

## **2 Declarations of Interest**

## **3 Renewal of the Sexual Entertainment Venue licence**

The Licensing and Public Protection Manager introduced the report as published.

The response to a Member question was as follows:

- The dates and timings that the applicant is applying for are the same as the previous application. It was also confirmed that there were no complaints received last time the licence was issued.

The objectors who couldn't attend had their speeches read by a Democratic Services Officer, they made the following points:

- The frequency exemption means that the Council feels that it has no choice but to grant the licence.
- The committee should avoid watering down the conditions. The conditions are based on the Council's own 2020 Community Impact Statement.
- The Council is aware that females in particular feel disadvantaged by the Sexual Entertainment and the licensing of SEV's.
- It is concerning that the applicant has again requested a variation to conditions, which would mean that they can hand out flyers for the bus and used a marked vehicle to transport customers.
- Although Dream Boys events are advertised freely and it could be perceived that Eroticats are being treated differently, however there is an epidemic of male violence against women and girls not an epidemic of violence against men and boys.
- Strip clubs normalise the objectification and dehumanisation of women and girls and the Council was right to issue a policy that limits the way that these clubs are advertised.
- Some might say that there is far worse available on line, this is true but should not be used as an argument to allow strip clubs to be advertised freely.
- A request was made for the Council to continue to lobby the Home Office to remove the exemption.
- Many women avoid the town during race week due to routine harassment from drunk men.
- Turning pubs into strip clubs only reinforces objectifying women. The SEV's make the atmosphere really unpleasant and unsafe for women.
- GlosWomen have written to the Minister for Safeguarding and Violence Against Women and Girls to request that the SEV frequency exemption be reviewed as a matter of urgency.

A supporter addressed the committee and made the following points:

- She has worked for the applicant for over a decade, starting as a performer and now as a house mother.
- She stated that she stays with the organisation as it is the only one that provides security.
- The courtesy bus plays a vital part in getting the performers home safely.
- It is a well-run, safe legal business, performers return year after year to work for them, which is an indication of how happy they are with the organisation.
- She has worked at places before under the exemption and they are nowhere near as well organised and the performers are not as well looked after.

The applicant's representative then had the opportunity to address the committee and made the following points:

- The applicant has been operating SEVs since 2010 but has been operating in this premises since 2021.

- This application is for the same plans as last time, there is no variation to the special condition that was accepted last year.
- There are no issues with the location as the venue is within the designated permitted area (DPA). The DPA is an area of a mix of night time economy venues.
- There is a history of compliance with this operator, it only operates for a limited number of days per year and has minimal impact on the locality.
- They are not asking for anything different to what they have requested previously, nothing material has changed since the initial grant.
- The bus has been mentioned in one of the representations, it has been discussed at every hearing, the bus is crucial to safe transport of performers and aids in the transport of customers, the flyers are approved annually for the bus.
- The Council is rigorous in its visiting and checking that the premises is run as it should be.
- The police also visit and there are briefings before and after the events, this would not happen if they operated under the exemption.
- One of the representations refers to research regarding violence against women, they have read the research and there is no proof that this is linked to SEV's. It is a depressing read, but the belief is that a nil cap would drive unregulated environments.
- In lots of places women do not feel safe not just in the locality of SEV's.
- With regard to the Public Sector Equality Duty the applicant does what they can, there is an equality impact assessment, they participate in many schemes and work with agencies in a transparent fashion.
- There have been no representations from the police, as the authority on crime and disorder due weight needs to be given to that.
- The applicant has an exemplary history, the races attract a huge amount of people over a few days.
- It is a lawful activity and it is better to have a licensed venue,

There were no Member questions.

The applicant's representative was then given the right to reply and made the following points:

- It is disappointing that there is no evidence that is directly related to the SEV.
- The applicant runs a tight ship, he is an open and transparent operator who is involved in the community. It is a well-run operation.

The matter then went to Member debate where Members made the following points:

- There was acknowledgement and thanks for the amount of information provided by the applicant's representative.
- It is legal and lawful to operate an SEV, there have been no objections from the police and there are no mandatory grounds to refuse the application.
- The applicant is a suitable applicant and there have been no complaints for a number of years.

- The Member had visited the venue during the races and seen the operation, had also visited the places operating under the exemption and the two places are extremely different.
- The venue is within the designated permitted area so there are no concerns with the venue.
- Pleased to see there is an equality impact statement.
- Happy with the house rules and the amount of support given to the staff.
- There was empathy for those who don't feel safe but there is no evidence that this venue can be blamed.
- These applications always receive a lot of attention, but there was hope that people are understanding that there is very little that the Council can do unless there is a change in the law.
- A lot of alcohol is consumed at the races and that is a contributory factor for people not feeling safe at that time.
- Unfair to blame one discreet business for people feeling unsafe in town.
- There is the exemption that they could operate under, but it is better to have a licenced premises.

The matter went to the vote in favour of granting the application – the vote was UNANIMOUS to grant the application as applied for.

#### **4 Local Government Act 1972**

The vote was taken on the following:

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

The vote was unanimous and the meeting entered exempt session.

#### **5 Review of a hackney carriage drivers licence**

The Licensing Officer introduced the report.

The driver addressed the committee.

After the debate in private session the Members gave their unanimous decision to REVOKE

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

There was one urgent matter of business that brought to the committee.

There was no report given the lateness of the issue. The Licensing Officer explained that the driver has a vehicle that is 2 months older than the policy allows. The vehicle is in good condition. It was confirmed that it was believed that the driver did not wilfully ignore the matter and although the vehicle is older than the policy states it should be it is fit for the road.

It was confirmed in response to a Member question that officers have no concerns regarding this case and that there could be better steps to ensure that driver knows that they need three licences. Although the driver should have known this since he was notified he has sought to rectify the matter as soon as possible.

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## "Miscellaneous" Licensing Sub-committee – 3 December 2025

### Local Government (Miscellaneous Provisions) Act 1982

### Application for a Renewal of a Sexual Entertainment Venue Licence

### European Events Consultants Ltd.

### Report of the Senior Licensing Officer

#### 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 20 October 2025 in respect of Under the Prom, 109 – 113 The Promenade, Cheltenham GL50 1NW.
- 1.3 The renewal application is to authorise the premises to provide relevant entertainment on the following dates and times:
  - 1.3.1 Friday of the November Meeting – 8pm to 5am the day following.  
Saturday of the November Meeting – 8pm to 5am the day following.
  - 1.3.2 Monday to Friday of Cheltenham Festival Week each year. Dates to be confirmed in writing 1 month prior to the event to the Council and Police.
 

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
- 1.4 In addition, the applicants have also applied to vary two of the 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 council's 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 variation 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.

Both variations were included in the previous issued licence.

- 1.5 A copy of the application form is attached at **Appendix A**.
- 1.6 A copy of the location map is attached at **Appendix B**.
- 1.7 A copy of plans of the premises are attached at **Appendix C**.
- 1.8 A copy of the premises existing SEV licence is attached at **Appendix D**.

## **1.9 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](mailto: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 to 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 24 representations. These were made up of 2 objections and 22 representations in support of the application from residents and others during the statutory consultation period. Copies of these are outlined in **Appendix E**.

### 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 and terms and conditions relating to the regulation of SEVs.

25/01966/SEXR		
	Page 3 of 11	Last updated 25 November 2025

- 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**

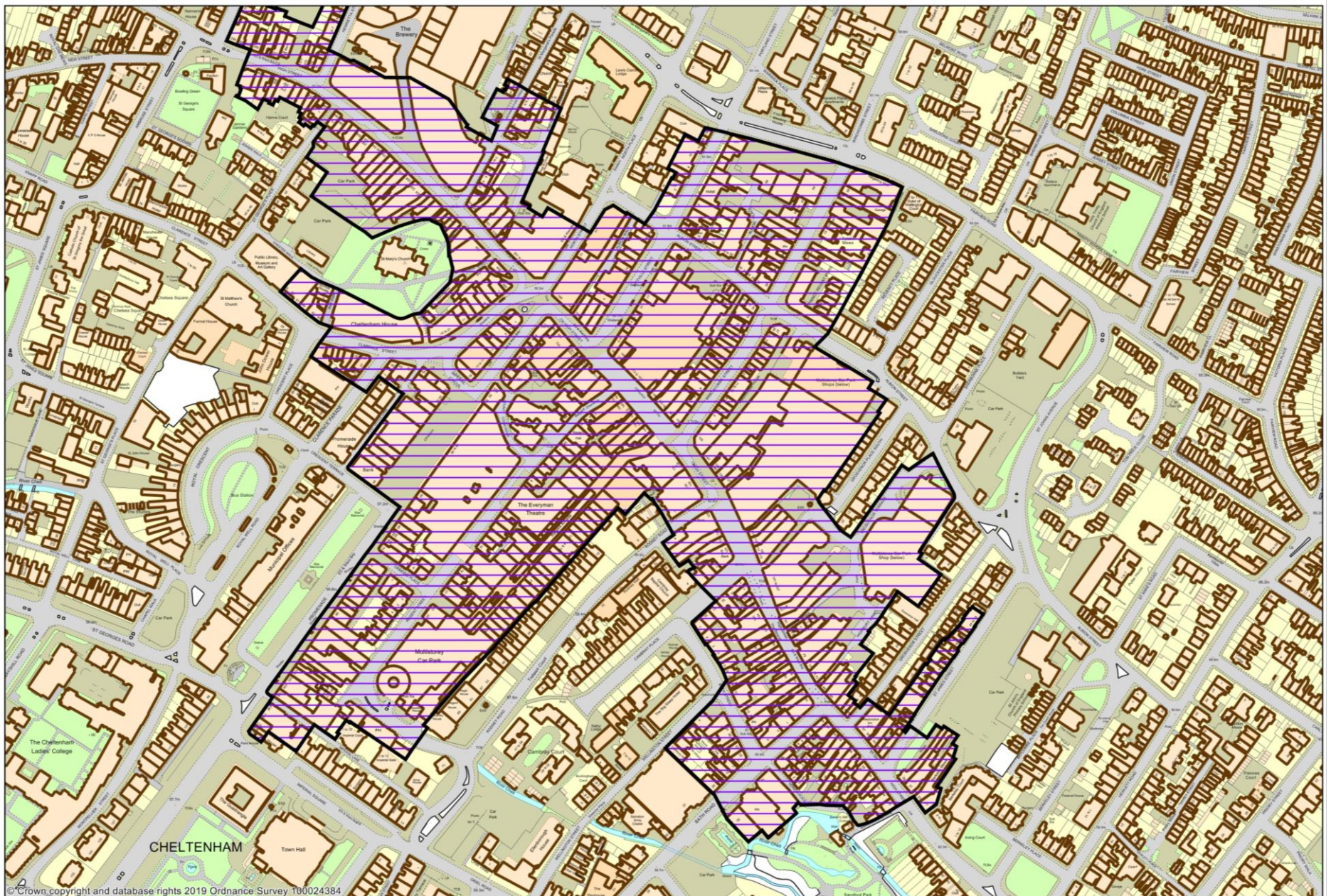
- 4.5 A licence may be refused where:
- a) the applicant is unsuitable to hold the licence by reason of having been convicted of an offence or for any other reason;
  - b) if the licence were to be granted, renewed or transferred the business to which it relates would be managed by or carried on for 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 (shown below) 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 recognises 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.
- 4.9 It must be noted that this venue is situated just outside of that area but that the authority decided to grant the original application in respect of this venue. It should still consider that issue, but must give weight to the fact it granted the licence previously.



## Designated Permitted Area





- 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 is sited in a residential area;
  - b) Whether the premises is sited near shops used by or directed at families or children, or on frontages frequently passed by the same;
  - c) Whether the premises is sited near properties which are sensitive for religious; and/or
  - d) Whether the premises is 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 issues 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’ isPage 32:formance 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 it is 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;

- Page 34
- 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 As mentioned previously this venue sits outside the council's Designated Permitted Area and was granted a licence. The council's policy is to not grant applications in this location and if the committee does decide to grant this variation it should give clear and cogent reasons for continuing to depart from that policy principle.
- 7.7 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

**Appendices**

**Appendix A** – copy of application form

**Appendix B** – location map

**Appendix C** – plans of the premises

**Appendix D** – copy of current licence

**Appendix E** – copies of representations

**Case Officer**

**Contact officer: Jake Johnstone**

**E-mail: [licensing@cheltenham.gov.uk](mailto:licensing@cheltenham.gov.uk)**

**Tel no: 01242 262626**

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MUNICIPAL OFFICES  
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Tel: 01242 775200  
Fax: 01242 264210  
email: [licensing@cheltenham.gov.uk](mailto:licensing@cheltenham.gov.uk)  
[www.cheltenham.gov.uk](http://www.cheltenham.gov.uk)

## 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

24/02/87 / SEAR

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:

POPPCESTON ACCEN SOLICITORS

POPPCESTON ACCEN SOLICITORS

37 STONEY STREET

NOTTINGHAM

Post code NE1 1LS

Daytime telephone number of agent

Email address of agent

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

ENTICATS

Address of premises for which this  
application is made

UNDER THE PROM

109-113 THE PROMENADE

CHESTERHAM

Post code ELSO INW

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

SEE

ATTACHED

<input type="checkbox"/> Sunday -	from	until	hours
<input type="checkbox"/> Monday -	from	until	hours
<input type="checkbox"/> Tuesday -	from	until	hours
<input type="checkbox"/> Wednesday -	from	until	hours
<input type="checkbox"/> Thursday -	from	until	hours
<input type="checkbox"/> Friday -	from	until	hours

☐ Saturday - from                      until                      hours

SEE ATTACHED

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

1) TWO PIGS CHELTENHAM  
2) SEXO HOUSE, CHELTENHAM

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

EUROPEAN EVENTS CONSULTANTS LTD

Company address





UNIT 3 AMBROSE HOUSE  
METECOR COURTPost code EL4 3GL

Company telephone number

Company fax number

Company email address

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

1	2	3
Name	Name:	Name:
<u>SEVEN John Burrows</u>		
Address:	Address:	Address:
		
Post Code:	Post Code:	Post Code:
		
Date of birth:	Date of birth:	Date of birth:
		
National Insurance no.	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

<b>SECTION C</b>	<b>Declaration</b>
------------------	--------------------

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.

<b>PLEASE NOTE</b>
--------------------

<b>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.</b>
---

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.

Signature of applicant (s) \_\_\_\_\_

Name (s) in BLOCK CAPITALS \_\_\_\_\_

Capacity in which application is signed \_\_\_\_\_  
(see note above)

Date \_\_\_\_\_

**How to apply for a sexual entertainment venue licence**

This application and the appropriate supporting documentation should be forwarded to the Licensing Team at the address on the front of this form.

**Please read the guidance notes that accompany this application form.** Failure to comply with the application procedure could result in a licence not being granted.

The following are required in order to proceed with the application:-  
please tick the boxes below ✓ to confirm you have sent them

- **Application form** (all sections completed) ☐
- **Copies of plans** delineating the specific rooms or premises to which this application relates, with escape routes (in case of emergency) indicated. ☐
- **Copies of a location plan** showing the vicinity of the proposed premises with the premises themselves clearly marked. ☐
- **Planning consent documentation** as confirmation that you have permission to use the premises for the purpose for which you are making this application. ☐
- Any **additional information** in support of the application. ☐
- **What you need to show to establish your identity**  
*This will be required from the applicant named in Section A*
  - **Driving Licence original(s) for inspection (paper and photo card counterpart)** which will be photocopied by an officer from Licensing Team. *If you do not have a valid photo card driving licence then a valid passport must be shown to the Licensing Officer.* ☐
  - **If none of the above are available then please supply one of the following original documents-**  
Original birth certificate (or similar official document if born outside UK )  
P45 / P60 Statement  
Marriage certificate, passport ☐

If you have any queries or require assistance in completing the application form, please contact our Licensing Team at the address on the front of this form, or telephone 01242 775200.

Signature of applicant

Name (s) in BLOCK CAPITALS

STEVE BULLOWS

Capacity in which application is signed  
(see note above)

DIRECTOR

Date

14/10/25

**How to apply for a sexual entertainment venue licence**

This application and the appropriate supporting documentation should be forwarded to the Licensing Team at the address on the front of this form.

**Please read the guidance notes that accompany this application form.** Failure to comply with the application procedure could result in a licence not being granted.

The following are required in order to proceed with the application:-

please tick the boxes below ✓ to confirm you have sent them

- **Application form** (all sections completed) ☐
- **Copies of plans** delineating the specific rooms or premises to which this application relates, with escape routes (in case of emergency) indicated. ☐
- **Copies of a location plan** showing the vicinity of the proposed premises with the premises themselves clearly marked. ☐
- **Planning consent documentation** as confirmation that you have permission to use the premises for the purpose for which you are making this application. ☐
- Any **additional information** in support of the application. ☐
- **What you need to show to establish your identity**  
*This will be required from the applicant named in Section A*
- **Driving Licence original(s) for inspection (paper and photo card counterpart)**  
which will be photocopied by an officer from Licensing Team. *If you do not have a valid photo card driving licence then a valid passport must be shown to the Licensing Officer.* ☐
- **If none of the above are available then please supply one of the following original documents-**
  - Original birth certificate (or similar official document if born outside UK)
  - P45 / P60 Statement
  - Marriage certificate, passport☐

you have any queries or require assistance in completing the application form, please contact our  
at the address on the front of this form or telephone 01242 775200



**Days/ Hours to be applied for:**

Friday ,Saturday and early hours of Sunday for the Cheltenham Racecourse November Meetings each year. Dates to be confirmed in writing 1 month prior to each Cheltenham Racecourse November Meeting event to the Council and Police.

Friday of the November Meeting – 8pm to 5am the day following.

Saturday of the November Meeting – 8pm to 5am the day following.

Monday to Friday of Cheltenham Festival Week each year. Dates to be confirmed in writing 1 month prior to the event to the Council and Police.

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



Standard Conditions to be varied:

**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.

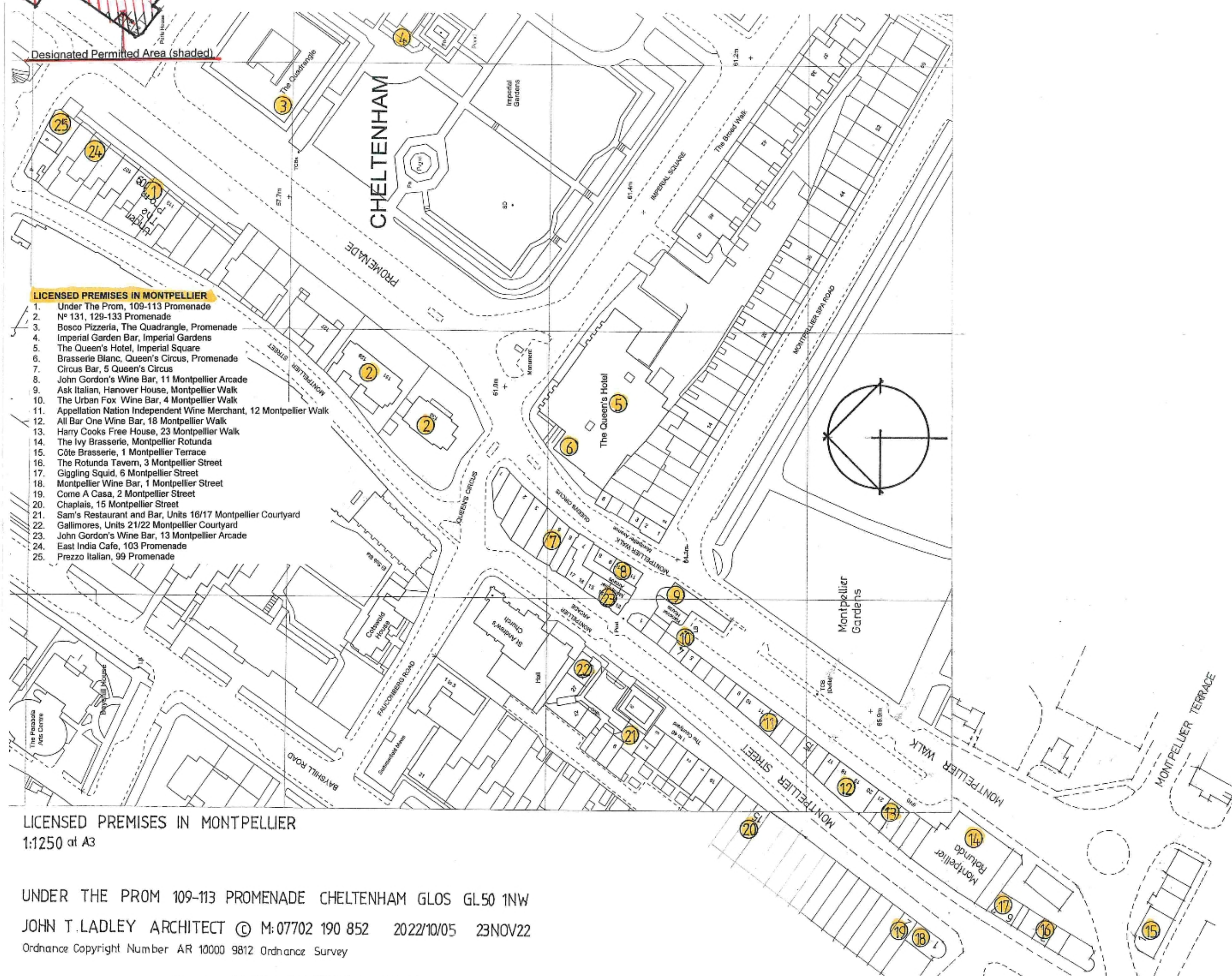
The reason for the variation of this condition is permit a vehicle to transport clientele to and from the venue at all times and for staff to be permitted to give out leaflets for the courtesy bus in the Town.

**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.







**LICENSED PREMISES IN MONTPELLIER**

1. Under The Prom, 109-113 Promenade
2. N° 131, 129-133 Promenade
3. Bosco Pizzeria, The Quadrangle, Promenade
4. Imperial Garden Bar, Imperial Gardens
5. The Queen's Hotel, Imperial Square
6. Brasserie Blanc, Queen's Circus, Promenade
7. Circus Bar, 5 Queen's Circus
8. John Gordon's Wine Bar, 11 Montpellier Arcade
9. Ask Italian, Hanover House, Montpellier Walk
10. The Urban Fox Wine Bar, 4 Montpellier Walk
11. Appellation Nation Independent Wine Merchant, 12 Montpellier Walk
12. All Bar One Wine Bar, 18 Montpellier Walk
13. Harry Cooks Free House, 23 Montpellier Walk
14. The Ivy Brasserie, Montpellier Rotunda
15. Côte Brasserie, 1 Montpellier Terrace
16. The Rotunda Tavern, 3 Montpellier Street
17. Giggling Squid, 6 Montpellier Street
18. Montpellier Wine Bar, 1 Montpellier Street
19. Come A Casa, 2 Montpellier Street
20. Chaplains, 15 Montpellier Street
21. Sam's Restaurant and Bar, Units 16/17 Montpellier Courtyard
22. Gallimores, Units 21/22 Montpellier Courtyard
23. John Gordon's Wine Bar, 13 Montpellier Arcade
24. East India Cafe, 103 Promenade
25. Prezzo Italian, 99 Promenade

LICENSED PREMISES IN MONTPELLIER  
1:1250 at A3

UNDER THE PROM 109-113 PROMENADE CHELTENHAM GLOS GL50 1NW  
JOHN T.LADLEY ARCHITECT © M:07702 190 852 2022/10/05 23NOV22  
Ordnance Copyright Number AR 10000 9812 Ordnance Survey

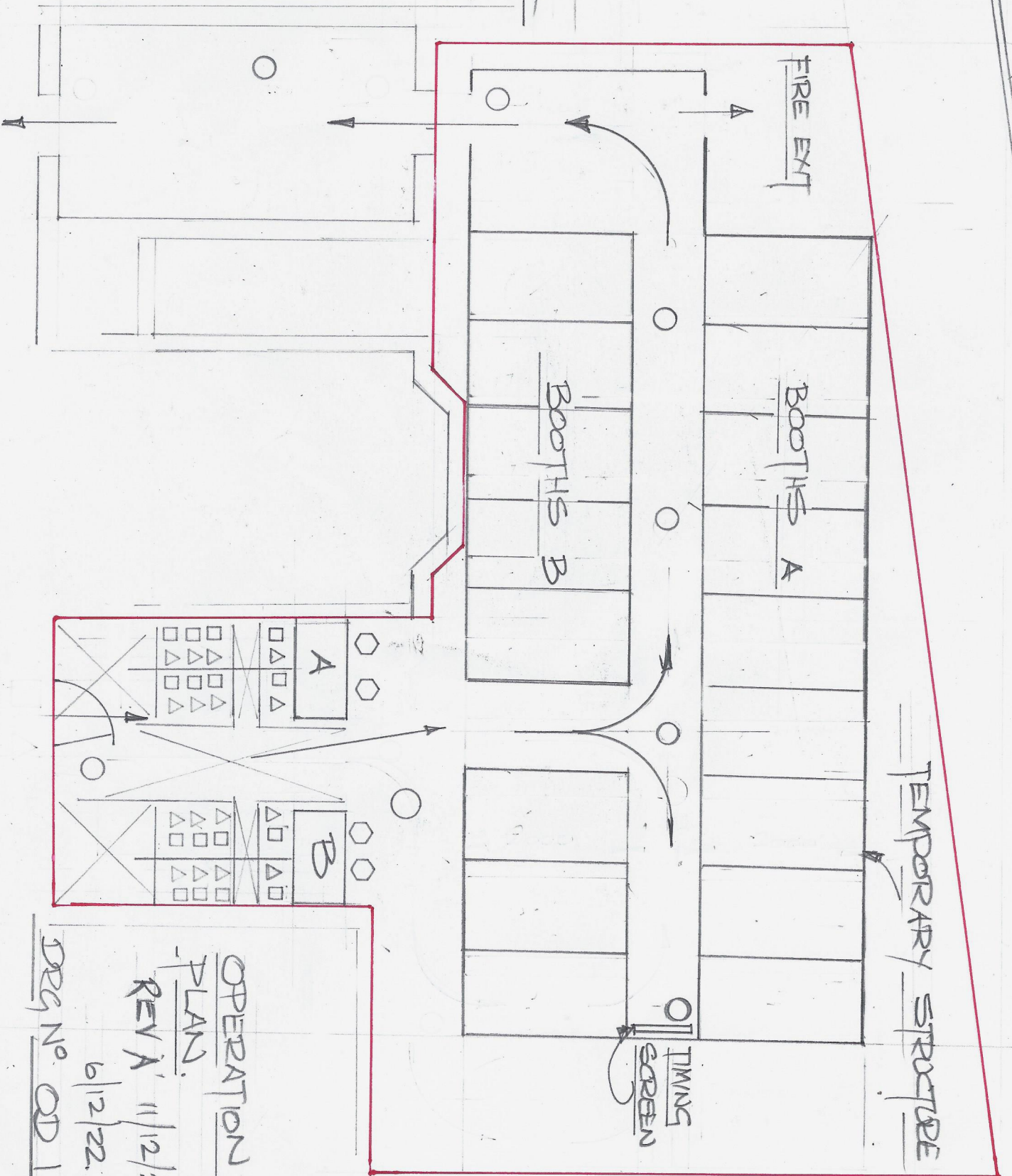
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# LEGEND

- - CASHIER
- - DOOR STAFF
- PERFORMER
- CUSTOMER
- ~~AREAS TO BE KEPT CLEAR~~

1066 2/3



OPERATION

PLAN

REV A 11/12/23

6/12/22

DRG N° OD 1

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

MONTPELLIER STREET

Pavement 4m

po

TEMPORARY STRUCTURE

BOOTH

BOOTH

TEMPORARY STRUCTURE 2

Link covering

CELLAR

LADIES

GENTS

DDA

Office

Dressing Room

FIRE EXIT

Changing Rooms

FIRE EXIT

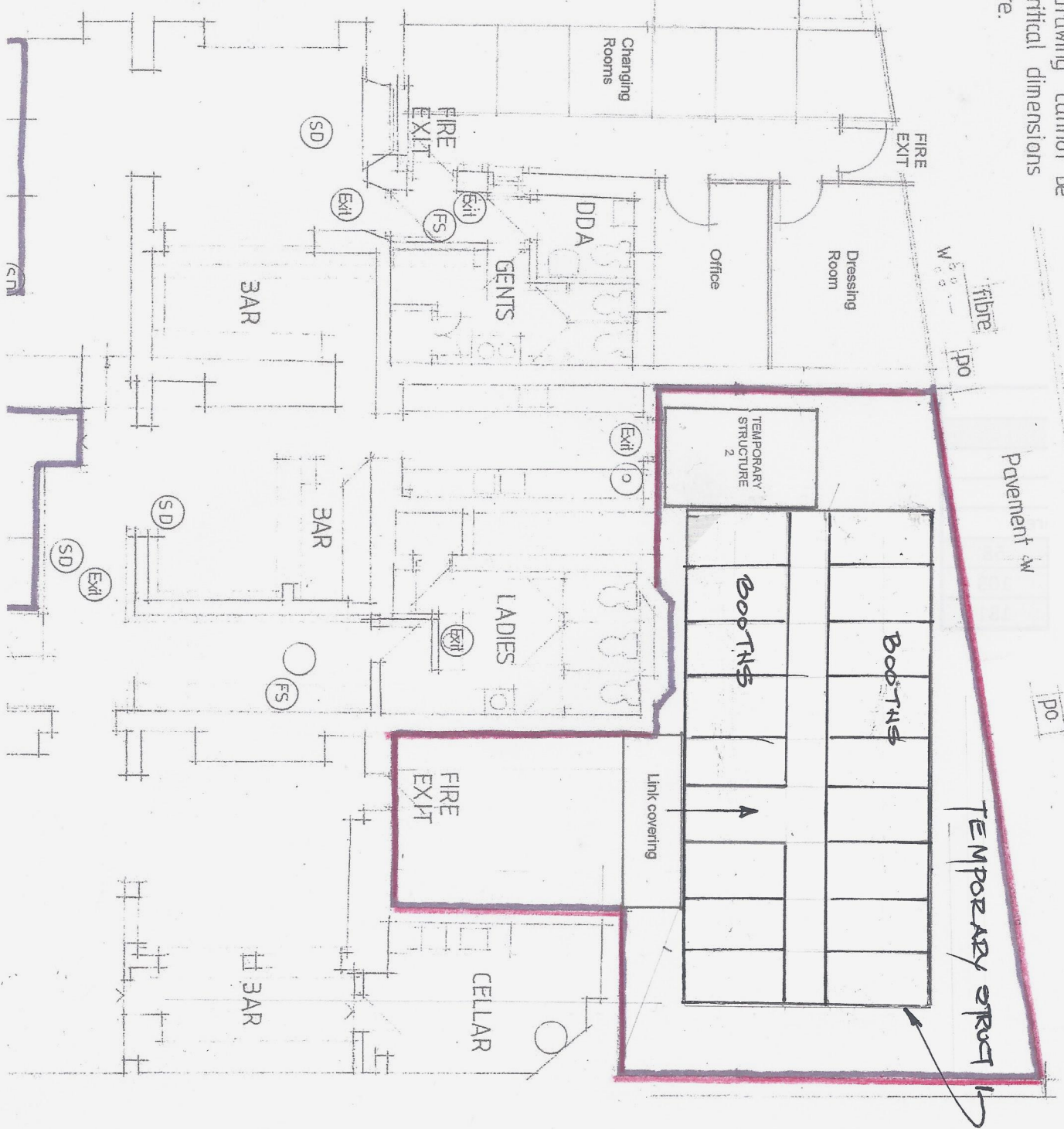
REV A 11/12/23

- LEGEND
- SD Ceiling Smoke Detector
  - FE Fire Alarm Call Point
  - FE Fire Extinguisher Point
  - FS Fire Sounder
  - Exit Emergency Lighting Exit Sign
  - License Area

BOOTH LAYOUT IN

TEMPORARY STRUCTURE

REQ NO SEV 1



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

MONTPELLIER STREET

Pavement SW

REVISIONS  
A First issue top copy drawing 7Dec22.

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

TEMPORARY STRUCTURES  
Manufacturer: Waiter  
Model: Multiform  
Size: Temporary Structure 1 = 10 x 5metres footprint, eaves height 2.4metres, ridge height 3.2metres, 18° pitched roof  
Temporary Structure 2 = 3 x 2metres footprint, eaves height 2.4metres, ridge height 2.6metres, 18° pitched roof  
White PVC sheet

Covering:

FOR BOOTH LAYOUT  
IN THIS AREA  
SEE DRG N° SEN1

INTERNAL BOOTH LAYOUT

DRG N° SEN 2

- LEGEND
- (SD) Ceiling Smoke Detector
  - (O) Fire Alarm Call Point
  - (FE) Fire Extinguisher Point
  - (FS) Fire Sounder
  - (Exit) Emergency Lighting Exit Sign
  - License Area

BASEMENT FLOOR PLAN  
1:100 at A3

Banner

UNDER THE PROM 109-113 PROMENADE CHELTENHAM GLOS GL50 1NW

JOHN T LADLEY ARCHITECT © N°07702 190 852 2022/10/02A, 22NOV22

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## SEXUAL ENTERTAINMENT VENUE LICENCE

### Local Government (Miscellaneous Provisions) Act 1982

Licence Ref No: **24/02187/SEXR**

Cheltenham Borough Council using its powers under the above legislation;

HEREBY GRANT LICENCE to	<b>European Events Consultants Limited</b>
to use the premises known as:	<b>Eroticats</b>
and situate at:	<b>109 Promenade</b>
	<b>Cheltenham</b>
	<b>Gloucestershire</b>
	<b>GL50 1NW</b>

This licence shall be in force from **7<sup>th</sup> February 2025** until **6<sup>th</sup> February 2026**

A fee of **£2468** has been paid for the grant of this licence.

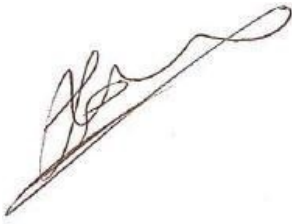
Date of issue: **4<sup>th</sup> March 2025**

Hours which premises may be open for entertainment:

<b>November</b>	<b>Friday of the November Meeting – 8pm to 5am the day following</b>
	<b>Saturday of the November Meeting – 8pm to 5am the day following</b>
<b>March</b>	<b>Cheltenham Festival Monday 8pm to 5am the day following</b>
	<b>Cheltenham Festival Tuesday 6pm to 5am the day following</b>
	<b>Cheltenham Festival Wednesday 6pm to 5am the day following</b>
	<b>Cheltenham Festival Thursday 6pm to 5am the day following</b>
	<b>Cheltenham Festival Friday 6pm to 5am the day following</b>

**Dates to be confirmed in writing 1 month prior to each event to the Council and Police.**

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

A handwritten signature in dark ink, appearing to read 'LK', with a long, sweeping horizontal stroke extending to the right.

Louis Krog  
Head of Public Protection

**Second Schedule**

**STANDARD CONDITIONS REGARDING SEXUAL ENTERTAINMENT VENUES**

The applicant was granted permission to vary standard conditions 6 and 25.

**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 council's 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 variation 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.

**The varied condition 25 now reads as follows:**

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

**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. See above for hours granted.
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**

6. See above for varied condition.

**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. See above for varied condition.
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 Conditions**

1. The licence holder will work with Cheltenham Borough Council to promote the safety of women in relation to race week each year. This may be through activities in relation to performers at the venue and/or through the activities of those persons that distribute flyers in the town centre, and through training of management and staff of the venue.
2. The licence holder shall ensure that the venue's courtesy bus shall not drop off customers on Montpellier Street when arriving at the venue.
3. The licence holder shall ensure that there is no customer access to the outdoor temporary structure via Montpellier Street, except in the event of an emergency or for access for disabled persons.

### **Plan**

- Drawing No OD1 Rev 11/12/23
- Drawing No SEV1 Rev 11/12/23
- Drawing No SEV2



**LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1982**

**SEX ENTERTAINMENT VENUE LICENCE**

Licence No: **24/02187/SEXR**

This licence is granted by Cheltenham Borough Council to the person named in the First Schedule hereto as the Licensee to use the premises described in the said Schedule for the use as a sex establishment specified therein for the period during the hours specified therein.

The licence is subject to the Council's Standard Conditions for the Sex Establishment Licences together with any Special Conditions set out in the Second Schedule hereto.

The Licence must be available for inspection at all times and must be displayed in a conspicuous position on the premises for the duration of the Licence.

I hereby agree to  
**LICENSEE ACKNOWLEDGEMENT**  
abide by and comply with all Conditions attached hereto.

Signature of Licensee.....

Name (in block capitals).....

Dated this.....day of.....20.....

Please return one copy this form to:

Licensing Section  
Public Protection Division  
Cheltenham Borough Council  
PO Box 12 Municipal Offices  
Promenade  
Cheltenham GL51 1PP





**CHEL TENHAM**  
BOROUGH COUNCIL

**LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1982 – S.2. And  
Schedule 3**

**SEX ENTERTAINMENT VENUE LICENCE**

Licence No: **24/02187/SEXR**

This licence is granted by Cheltenham Borough Council to the person named in the First Schedule hereto as the Licensee to use the premises described in the said Schedule for the use as a sex establishment specified therein for the period during the hours specified therein.

The licence is subject to the Council's Standard Conditions for the Public Entertainment Licences together with any Special Conditions set out in the Second Schedule hereto.

The Licence must be available for inspection at all times and must be displayed in a conspicuous position on the premises for the duration of the Licence.

**LICENSEE ACKNOWLEDGEMENT**

**I hereby accept Licence No. 23/01946/SEXR as prescribed herein and agree to abide by and comply with all Conditions attached hereto.**

Signature of Licensee.....

Name (in block capitals).....

Dated this.....day of.....20.....

Please return one copy this form to:

Licensing Section  
Public Protection Division  
Cheltenham Borough Council  
PO Box 12 Municipal Offices  
Promenade  
Cheltenham GL51 1PP

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Eroticats 2025 representations – 109 Promenade

1.

Under The Prom, 2026 renewal licence

Hello Licensing team

I have worked as a doorman for more than 30 years, holding a current SIA licence.

Head doorman at Under the Prom, Cheltenham. I have worked in clubs making use of the exemption with no guidelines or rules to be followed. In my experience working as a professional door person have witnessed the advantages with clubs operating with an SEL including Under The Prom race meetings March and November 2023/24 and March 2025

Women's safety in Cheltenham is an ongoing issue beyond race meetings. In my experience, Eroticats, an outside promoter, uses professional practices and works closely with security to help prevent incidents unrelated to UTP March and November.

Based on my experience working at a club with an SEL, I have seen the big difference from unregulated to regulated environments and the application of guidelines and rules. The club ensures safe transport for dancers and staff at the end of each night—a service I've not experienced elsewhere.

I would assist and support UTP / Eroticats SEL renewal application.

2.

SEL Renewal Under the Prom GL50 1NW

I am writing in support of European Events SEL application.

As a licensed SIA individual, I have previously worked under Mr Burrows as a member of the courtesy bus driver team. We provided safe transportation for lap dancers, staff, and customers upon request. This courtesy bus service has become highly valued, extending beyond Eroticats' clientele to assist those in distress during the Cheltenham festivals.

I trust the council committee will evaluate this licence application based on its merits

3.

Under the Prom, Sexual License

I 'am in support of the SEL application from Under the Prom Cheltenham, for the renewal of their lap dancing licence. I have visited the club thought the year and when sexual entertainment takes place. In my humble opinion believe a suitable club within a suitable location and it's only a few nights according to the licence application.

Thank you for taking the time to read my email of support

4.

SEL Renewal application UTP Cheltenham

I reiterate my support for an SEL renewal at the above premises. I have previously work in Cheltenham for over 26 years at various clubs in the town centre. After SIA training as a close protection officer now working in the close protection sector of the security industry. Which has included for Mr Steven Burrows, being contracted during the Cheltenham March/November festivals.

Regulated sexual entertainment provides a greater protection for all concerned working or attending Cheltenham festivals.

The police knowing the operator and venue working together creating the reputation for Cheltenham as being a safe and enjoyable experience for all.

Unregulated Sexual Entertainment provides no protection and the unknown entity operating during the lucrative March/October /November festivals. Where police resources with the enforcement of the uncontrolled underground could be better utilized.

I would urge the benefits of a regulated Sexual entertainment licence to be considered during granting of this application.

5.

Licensing Committee

Lap dancing and Cheltenham

I support UTP's licence application. My attendance at their events in Cheltenham during March and November festivals is my personal decision. Negative opinions about lap dancing do not make those views valid.

Cheltenham Borough Council's licensing team oversees lap dancing venues to ensure visitor safety. These regulations aim to address concerns related to Cheltenham nightlife during the Gold Cup Festival.

I advocate regulation of lap dancing in Cheltenham for March and November festival.

6.

Licensing Committee

Lap dancing and Cheltenham

I support UTP's licence application. My attendance at their events in Cheltenham during March and November festivals is my personal decision. Negative opinions about lap dancing do not make those views valid.

Cheltenham Borough Council's licensing team oversees lap dancing venues to ensure visitor safety. These regulations aim to address concerns related to Cheltenham nightlife during the Gold Cup Festival.

I advocate regulation of lap dancing in Cheltenham for March and November festival.

7.

Dear Committee

SEL: Under The Prom, Promenade Cheltenham

I travel every year to Cheltenham in March for the Gold Cup and for the November meeting without fail from Ireland. These Cheltenham race meeting being unmissable for my wife and friends.

We have stayed in Cheltenham at the same hotel and use the same bars and finish the night at the Eroticcat club by choice, a club which is not just full of drunken males

The wife and friends and I would all confirm our support with the much-needed alternative entertainment which we all enjoy when in Cheltenham especially after a day on the racecourse.

I have never witnessed any anti-social behaviour unlike other bars we have visited during the Cheltenham festivals.

8.

### Cheltenham Licensing

To whom this application may concern

Email regarding a licensed and regulated lap dancing events scheduled for 2026.

I have worked with Steven and the Eroticats dancers for several years. In my experience, a licensed club with a strict door policy establishes a safe working environment for dancers and staff.

March is both challenging and rewarding. Applying for a lap dancing licence reflects a collaborative approach with Cheltenham licensing authorities and the police, ensuring a secure and regulated environment. During the festival, I have observed officials conducting venue inspections and engaging with dancers—oversight that would not be present under the exemption rule. In my experience, I feel significantly safer working in a licensed lap dancing club compared to other licensed establishments.

Based on my experience, I support a licensed lap dance club in March.

Many thanks

9.

To whom it concerns,

Cheltenham SEV renewal

An SIA licence holder based in Gloucestershire has experience working at both a licensed lap dancing venue and a venue operating under an exemption in Cheltenham.

An SEV maintains a structured environment for dancers and customers by implementing clear rules and welfare guidelines that are regularly reviewed and inspected.

Misconceptions circulating on social media and in tabloids regarding SEVs, particularly concerning clientele. Recent inspections have shown that SEVs are increasingly attended by

women and couples following racing events. These venues operate under council guidelines and SEV policies to ensure safety for visitors and employees.

In my experience, implementing a regulated SEV licence contributes to a safer environment for both employees and customers.

10.

A regulated SEL-licensed venue offers far greater benefits to Cheltenham town during the March Cheltenham Festival 2026 than any unregulated lap-dancing venue. It is challenging to comprehend why anyone would consider a no-rules lap-dancing venue to be a safer option than a licensed one.

Numerous objections to previous applications have frequently cited women's safety, attributing anti-social behaviour to sexual entertainment venues. However, there is a lack of evidence to support such claims. As stated by Police and Crime Commissioner Chris Nelson on Gloucestershire Live, 4th November 2021, "It is hard to find specific evidence outside 2 Pigs, that sexual assaults have been caused by that sex club. I have looked at this quite closely." It is important to remind such individuals that this form of entertainment is lawful, even if they disagree with it on moral grounds.

Cheltenham has proudly retained its Purple Flag award for the tenth consecutive year. This accreditation recognises Cheltenham's excellence in the evening and night-time economy, underscoring the Cheltenham Borough Council's commitment to ensuring the safety of residents and visitors, particularly during the Cheltenham horse race Festivals.

The Cheltenham horse racing festivals provide a crucial lifeline for many hospitality businesses in Cheltenham. Clubs that choose to diversify into this legitimate form of entertainment respond to supply and demand. By demonstrating transparency and collaborating with local authorities, they should not be penalised for adhering to the rules and creating a safer environment for performers and patrons.

Please note, I find the term 'Sex club' used by the Police & Crime Commissioner to be both offensive and misleading. It creates a false impression of lap dancing in Cheltenham.

Thank you for taking the time to consider my email supporting this application.

11.

SEL Renewal

1st November 2025

Supporting Mr Burrows's application highlights his commitment to Cheltenham's night-time economy, proven adaptability in a shrinking industry, and his experience as a licensed SEV operator. His professionalism, knowledge of health and safety, and efforts during festivals contribute to maintaining Cheltenham's reputation as a safe town year-round.

We all 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 grounds of morality.

Approve this application based on merit

12.

The Licensing Section Cheltenham

email of support SEL application

Under the Prom, Cheltenham

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 increase of the unregulated lap dancing run by persons unknow removing everything achieved by Cheltenham Borough Council licencing committee over the past number of years in the creation of a safe working environment for performers and the customers at Cheltenham festivals.

No control has 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. I do not feel anymore unsafe during the Cheltenham festival dates in fact I would say feel safer the number of police and door staff on duty.

Thank you for reviewing my support email.

13.

Committee members

Regarding the Promenade Place Renewal Application

I wish to express my ongoing support for this sexual entertainment licences.

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.

At first, I doubted whether Cheltenham was suitable for lap dancing. However, after meeting Eroticats' management in 2010, their thorough planning and commitment to health and safety reassured me, all the dancers are regarded with respect according to the established guidelines.

Incidents of anti-social behaviour tend to rise during the Cheltenham festivals, which places increased demands on the resources of the Gloucestershire constabulary. A regulated SEV allows Cheltenham council to collaborate with an entity that helps maintain a safe working environment for dancers, staff, and customers in Cheltenham particularly when the towns nightlife becomes significantly more active.

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

14.

Cheltenham Borough Council

Sexual entertainment renewal application,

The application to renew the Sexual Entertainment Licence (SEL) for Under The Prom, located at 109-113 Promenade, Cheltenham, GL50 1NW, underscores the transparent partnership with Cheltenham Borough Council and strict adherence to regulations. This approach allows for better control compared to the exemption ruling, thereby reducing the high risk of sexual entertainment going underground during the Cheltenham horse race festivals.

SEL venues in Cheltenham have collaborated with the police to reduce serious incidents during festivals. Compared to venues operating under the exemption ruling, regulated SEL venues offer better welfare and health safety measures for both performers and the public.

I endorse the application.

15.

FAO: Sexual Entertainment License Committee

Another year, another email to share my support for Sexual Entertainment License held at Under The Prom, Cheltenham. As previous emails I have addressed to you, my support and decisions remain the same.

Working in a licensed premises is better for everyone involved. There are rules and regulations in which are needed to be met while holding a license, this ensures performers, staff, customers and general public are kept safe. A company who is working along side the local authorities will ensure that everyone is protected. This is hugely important 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. Allowing performers and all the staff who work in Cheltenham during the festivals the support they deserve.

16.

Cheltenham Gold Cup Week,

Cheltenham residents alter their behaviour during Gold Cup Week. Many avoid Cheltenham town centre during the Gold Cup, not due to lap dancing but because of the large crowds attending the races.

There is no evidence linking lap dancing to safety concerns for women in Cheltenham in March. Were any incidents reported under last year's license? As a regular visitor to UTP, I find that safety measures are stricter during March festival days, making it clearly the safest venue in town which is not exclusively attended by men.

Some individuals choose not to attend horse racing due to personal disagreement, just as others may choose not to participate in lap dancing. Both are legal and regulated forms of entertainment and prohibiting either could result in the emergence of unregulated alternatives.

Supporter of regulated lap dancing policies.

17.

Public Notice Licensing Act 2003

SEV application Cheltenham



I'm a lifelong Cheltenham resident who enjoys socialising throughout the year, including the Lady's Day at the Gold Cup week festivals.

Cheltenham's racing community has been noted for instances of antisocial and drunken behaviour, and in recent years, the town has become a popular destination for stag and hen parties during the Cheltenham Gold Cup. Measures that are implemented to manage the high number of individuals in the town centre following their departure from Cheltenham racecourse, particularly since many have consumed alcohol throughout the day and intoxicated.

The increased presence of police and security door staff during the festival aims to enhance safety for all attendees, regardless of gender. Officers patrol the town on foot as well as by vehicle to help ensure a secure environment. A controlled SEL provides law enforcement with a regulated partner, unlike unregulated entities that could appear and disappear with no accountability.

Cheltenham MP Max Wilkinson interview Lucy McDaid Political Correspondent, ITV News West Country Monday 10th March 2025 at 5:09pm

"Most of the people who are attending Cheltenham are men and that does create the demand for Sexual Entertainment Venues"

"I don't think anyone would say we want strip clubs in Cheltenham, but it's better that it happens in a licensed way rather than an unlicensed way"

"At least if we've got licences there is some kind of monitoring that can be done by the local authority and the police"

Sexual entertainment is in demand and is enjoyed by both genders at festivals. A full-time strip club year-round isn't necessary. The Cheltenham festival dates it's a case of "horses for courses". Licensed, unlicensed, regulated, unregulated, controlled, or uncontrolled?.

18.

Dear licensing team,

I write to object to the European Events Consultants application to renew their licence to use Under The Prom as a sexual entertainment venue, the strip club Eroticats.

I understand that the frequency exemption means the council will feel it has no choice but to issue this license but I ask them to avoid watering down their own license conditions.

These conditions, including those relating to advertising, did not come out of thin air. They are based on the council's own [2020 community impact statement](#) which describes the "inherent risk for performers" who work 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."

Given this context, it is concerning that the applicant has again requested a variation to their license conditions which means they can continue to hand out flyers advertising the Eroticats bus which will be cruising around Cheltenham during race meetings plastered with the Eroticats logo.

Would the council allow this advertising if Eroticats was a brand of tobacco?

The inherent risk of tobacco means there are strict limits on the way it is advertised. Strip clubs carry an “inherent risk for performers” and make women feel objectified and intimidated, so surely they should be treated in the same way.

I also ask the council to continue to lobby the Home Office to remove the frequency exemption. Other councils have issued complete bans on strip clubs operating in their area. It's undemocratic that this isn't even an option in Cheltenham, thanks to the exemption.

According to the Not Buying It guidance “[Strip Clubs and The Law](#)”, this is a relatively easy process which does not require new legislation.

As Cheltenham MP Max Wilkinson says, “The exemption in the law that allows pop-up sexual entertainment makes a nonsense of licensing regulations and creates added risks for women and girls’ ([Glos Live](#))

Some believe that even if the law was changed it would be better to license strip clubs, otherwise they will be driven underground. Evidence from other areas, suggests this is not the case. The more clubs you license the more clubs you get. Licensing strip clubs means they are normalised. Men are groomed into paying for so-called sexual entertainment and women are groomed into providing it. See [Still Stripping The Illusion](#) by Not Buying It.

Please stop allowing the advertising of Eroticats and please do all you can to lobby for a change in the law.

19.

Lap dancing is not offered year-round in Cheltenham. Several clubs have explored operating a full-time lap dancing club, but these ventures were unsuccessful due to insufficient demand. There is increased activity during Cheltenham horse racing events, resulting in the appearance of pop-up venues operating under the exemption law. That indicates demand for lap dancing at Cheltenham horse racing events.

Opposing licensed lap dancing is effectively supporting unlicensed lap dancing, so arguments about the performer and women's safety lack logic.

For the past ten years, the applicant has consistently applied for Sexual Entertainment Licences, all of which have been granted. I have attended and listened to the online hearings with interest

This application is supported.

20.

Dear Licensing Team Date: 12 November 2025

### **SEV Licence Application - 25/01966/SEXR**

We are writing on behalf of our members to object to the renewal Sexual Entertainment Venue application submitted by European Events Consultants Limited, trading as ‘Eroticats’ (‘the Applicant’) to allow for stripping at Under the Prom, 109-113 Promenade, Cheltenham to coincide with race meets at Cheltenham Racecourse in November 2025 and during Race Week in March 2026.

### **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'.<sup>1</sup>

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.<sup>2</sup>

Plan International's recent 'The State of Girls' Rights in the UK Report' (July 2024) made for bleak reading<sup>3</sup>. 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.

<sup>3</sup> Plan International - The State of Girls' Rights In the UK Report 2024 - <https://plan-uk.org/state-of-girls-rights> <sup>2</sup> Safe and Equal Bristol Report: Sexual Entertainment Venue Policy Review 2021 -

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

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

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’.

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.

### **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 continue to 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.

GlosWomen has written to Jess Phillips MP, Minister for Safeguarding and Violence Against Women and Girls to request that the Sexual Entertainment Venue (SEV) ‘frequency exemption’ is reviewed as a matter of urgency. In their response to us, the Home Office noted that they are considering, as part of the government’s VAWG Strategy, how they can address the various drivers of VAWG, including the objectification of women and girls.

### **Variations to SEV Policy Standard Conditions**

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 in areas such as advertising, soliciting and operating hours - with scant evidence to justify such changes. We note such variations have again been submitted as part of this application.

We also note that a proposed variation to Standard Condition 25, to allow for bodily contact between performers has also been submitted as part of this application. We remain concerned that such a variation represents a blurring of boundaries, which could put women performing in the venue at an increased risk of harassment and/or assault.

### **SEV Policy Consultation**

We note that progress in respect of the SEV Policy Consultation has been paused following the receipt of further representations which were made to councillors after the SEV Policy Consultation period. We understand that, as a result of these further representations, a working group is to be formed to consider the SEV Policy in more detail, with the potential for further changes to be made for approval by Cabinet.

Whilst reviewing the SEV Policy Consultation documentation, GlosWomen were concerned that CBC's Equality Impact Assessment focussed primarily on public safety and performer welfare and failed to adequately consider the impact on **all** women and girls, of the sexist attitudes which are reinforced by sexual entertainment.

The judgement in *CDE v Bournemouth, Christchurch and Poole Council* [2023] EWHC 194 (Admin) was clear that a focus on public safety and dancer welfare is insufficient to discharge the Public Sector Equality Duty. Whilst it seems that CBC's Equality Impact Assessment has been amended to include reference to research related to these concerns, we hope that CBC's SEV Policy working group will ensure that the Council's obligations under the Public Sector Equality Duty are properly considered as part of their review.

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)

21.

Hello,

I am writing to give my support for the SEV licence applied for by Eroticats for under the prom:-

I've worked with Eroticats for well over a decade now. As a performer and as house mother which is my current position. My role includes a range of responsibilities and safety of performers is a big part of that.

Eroticats is the only event/club I have encountered that takes performer, customer and staff safety as seriously as they do and that is one of the main reasons I continue to be involved in the operation.

I work alongside an excellent security team and feel incredibly supported during and after my shift. It's very rare to find clubs that make sure every performer and staff member gets home okay, in fact it's pretty unheard of in the industry these days. The courtesy bus plays a vital role in doing that.

Whilst I understand the reasons behind some of the objections this licence receives every year but I do feel that many of them fail to recognise the facts. Eroticats is a well run, safe, organised,

conscientious and legal business. I would not continue to be involved in the events if I didn't fully agree with the way things are conducted.

The statistics that show women feeling unsafe during racing dates in Cheltenham are certainly very disappointing. However, correlation does not equal causation.

As a woman, who knows this industry inside and out, I can categorically say that not granting this license would leave a gap in the market to be filled by another provider who is highly likely to exploit performers and customers for quick cash whilst taking no accountability for the security and safety of either. During my time in the industry I have encountered club owners and events organisers who do just that regularly.

To grant this license means structured, regulated and safe experiences for all involved.

Thank you

22.

Hello

I would like to give my support for the SEV licence that has been applied for under the prom.

I class myself as a feminist and that means I support all women and their choices to earn money how they want to.

23.

To whom it may concern,

I am writing to give my support for the Red Apple / Eroticats SEV licence for the venue "Under the Prom".

I have worked as a cashier for Eroticats a few years now and am always supported and respected. I am taken home after my shift in the mini bus and rely on this money to top up my income throughout the year.

Kind regards

24.

I'm writing to offer my support for the above. I've been to their events before and they have always been professionally run and I have felt safe, confident and had fun.

Yours faithfully

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