

23/01596/SEXA Objection Comments

1.

Previously the operator used the premises as a SEV during the Cheltenham Racing Festival in March 2023. 6-8 commercial waste bins connected to the SEV were lined up outside the front of our premises and despite us moving them each morning, they were placed outside our premises again every evening. This was inconsiderate as the bins could have and should have been placed outside their premises. As a result our 3 window displays could not be seen clearly. Also, the visual impact on the corner position of these listed properties in this historic part of the town was very unpleasant. This vibrant area is now very much a mix of commercial and residential property (the residential element has increased significantly in the past 5 years through conversion of empty commercial buildings). We let out a flat on the top floor of our adjoining building to a young couple. I am concerned that the frequency of the SEV operation's opening dates from October to May, the unsociable hours and associated noise will have a significant impact on the lives of the people living close to the venue.

2.

I have before complained reference this application and went to the hearing at the Council offices.

I work into the evenings as my business requires me to be flexible for clients and all those dates will mean that I cannot offer any appointments as would not expect my clients to have to walk and listen to the noise that comes from number 30. We have two residential flats in this building and surrounded by flats, this is not just a "business" area. We have all worked so hard to keep this area such a friendly community and this just cheapens and degrades, and he has as far as I know not even introduced himself and given any of us any confidence at all into this venture.

3.

I know you must be very busy but I am writing to register my objection to the application for an extended licence to cover events from 8 p.m. to 5 a.m. from October to May for 30 Cambray Place as an Adult Entertainment Venue.

Granting such an extension would be deeply offensive Christians, Muslims and other faith groups in the local area. In addition, Cambray Place is a shared space not just for businesses but also for local residents and families, including young children. The Adult Entertainment Venue is in close proximity to places of worship such as Cambray Baptist Church. There are for example various small alleyways connecting Cambray Place and Rodney Road and in the opposite direction connecting Cambray Place with Sandford Park. Such areas late at night when it is dark would be intimidating for women and other members of the public wishing to pass through this part of town if people were coming in and leaving the AEV into the early hours. In addition, there are a number of establishments in close proximity to the Adult Entertainment Venue used by children and young people and families such as the Entertainer, the Hickory-Dickory Day Care Nursery and a number of activities for young people and children happen in the evenings at Cambray Baptist Church. I am not sure shops such as Waitrose and others nearby with late night shopping would be that happy with an Adult Entertainment Venue open from 8 p.m.

Therefore, please would you reject the application for an extended licence for 30 Cambray Place.

4.

To whom it may concern,

I have been made aware of the above application for an extension to an existing Sexual Entertainment license at 30 Cambray Place, Cheltenham.

Whilst I do not have any objection overall to such licenses, I do believe that they should be permitted sensitively and with consideration to surrounding premises and their use.

The property in question is immediately opposite Cambray Church and under section 4.10c, Proximity to a Palace of Worship, I would object to such an application. Church is a spiritual environment, providing space for prayer and quiet reflection at all times. Increasing this license could cause members of the Church to feel vulnerable and uncomfortable by members of the public attending the premises at 30 Cambray Place.

I am sure you will give this application serious consideration before a decision is reached but I hope that the welfare of local residents will be given higher priority than those descending upon the town for the duration of a race meeting...

5.

I wish to register my opposition to this licence application for an establishment, the purposes of which should not be legitimised or validated in any way. Such premises are based on a misogynistic and objectifying view of women which should be totally unacceptable. They also often generate objectionable, antisocial behaviour and intimidating behaviour in and around the area they are in, most of it directed at women.

As a society we are experiencing an increase in violence in incidents in which women are the victims and a rise in discriminatory attitudes. The council should be taking a lead in helping to challenge and tackle these behaviours and attitudes. One way is to ensure that licences for premises of the type in this application are prevented from not granted.

6.

I am writing to object to the Sexual Entertainment Venue Licence (Ref 23/01596/SEXA) which has been applied for by Eroticats.

Cheltenham is marketed as a welcoming place which has a range of activities for families, couples and friends. It gives the impression of being a place of culture and sophistication with a mixture of literary, musical and sporting events. My most recent visit to the town was for several events at the Literary Festival.

I read through the Purple Flag award website describing the reasons that Cheltenham has achieved this award for six years:

*The nationally recognised award is given to towns and cities that have an **appealing, safe and welcoming evening and night-time economy.***

*...the Purple Flag award aims to **raise the standard and broaden the appeal** of town and city centres between the hours of 5pm and 5am. Areas awarded the Purple Flag are recognised for providing a vibrant and diverse mix of dining, entertainment and culture while **promoting the safety and wellbeing of visitors and local residents.***

*Cheltenham has had to demonstrate a continuing commitment to developing and maintaining a **safe evening and night-time economy (ENTE) which appeals to all.***

*Cheltenham's evening and night-time economy has been assessed as **safe, welcoming and inclusive.***

*Cheltenham's night-time offer has a vision that it should be **accessible and appealing to every sector of the population and above all safe.***

I do not think that a lap dancing venue fits with Cheltenham's commitment to being welcoming and safe for all and it is certainly below the standard of events generally taking place in the town. In 2023, when we are striving towards equality, diversity and inclusion it seems a backwards step to grant a licence for a venue which promotes misogyny and the exploitation of women. Surely in the 21st century it is possible to attract men to the race events without needing to entice them with the prospect of seeing naked women. It is not enough to say that a venue is well run when the entertainment on offer is discriminatory and degrading and attracts men who will be drawn to this. They are not confined only to the venue but will make the town more unsafe and unappealing to women; residents and visitors alike.

7.

The venue is opposite a Place of Worship, namely Cambray Baptist Church (Your ruling 4. IOC applies). It is very close, as there is no road separating the two buildings, just a paved pedestrian area. This Church has a large congregation and holds various events each day and evening, including a busy youth club and lunches for pensioners. These folk need to be able to visit their Church in safety.

I have personal recollections of being harassed by men attending the sex club which ran from The Three Pigs. I, thereafter, took care to avoid that area of town when the club was in operation, but this prevented me from attending events in the town centre, as my bus stop is in the lower High Street. I shall have the same concerns if the licence is extended to cover every race event. Currently I avoid the town centre on the Gold Cup dates but extending this licence would affect my enjoyment of the town centre for 3 days of 8 consecutive months.

I am not sure if you are aware, but three doors from the Club, at 33 Cambray Place, is a Mental Health facility, whose staff counsel victims of sexual assault and people who have left the sex trade. (Your ref 4.5dii applies here.)

8.

The application for a SEV licence is inappropriate because the characteristics of the relevant locality (and the Council Policy) indicate that it would be inappropriate for the following reasons:

A) The fact that the premises are sited in a residential area.

My family and I live in an area just off Cambray Place and have young children. We do not wish to be awoken by visitors to the premises who, given the nature of the application request, would (and have in the past) traipse the local surrounding area causing disturbances, waking up the locals during the early hours of the morning and late at night.

B) The premises are sited near shops used by or directed at families or children, or on frontages frequently passed by the same.

We have very young children and frequently pass the site on our way to and from school, as well as the local shops. Our eldest is naturally curious and inquisitive and notices every little change in his surroundings. What are we supposed to tell him when he asks what is happening there?

There are also two cafes directly opposite the establishment which are frequented daily by children, young persons and young families wishing to enjoy a peaceful sit down meal, as well as the family-friendly Oxfam shop which is adjacent to the site.

C) The premises are sited near properties which are sensitive for religious reasons; and

D) which are sensitive because they are frequented by children, young persons or families.

The site is located directly across from Cambray Baptist Church, an important place of worship in the local area and which receives a sizeable attendance of young children, young persons and families.

I do wish to also point out that the last time this venue was used for the purposes of being used as a SEV, those responsible for running the premises were parked ILLEGALLY in the pedestrian zone, as well as across the striped lines in the parking bay on Cambray Place.

I trust all the points above are sufficient grounds for the application of a SEV at the above-mentioned premises to be rejected.

9.

1. I write to object to **23/01596/SEXA** pertaining to an application for a Sexual Entertainment License at 30 Cambray Place. I submit this objection on two grounds:

a. Firstly, the grant of the licence would be inappropriate, having regard to the use to which any premises in the vicinity are put. The proposed premises is directly opposite Cambray Baptist Church, a long established, prominent and active Christian church in our town. It should be noted that Cambray Baptist Church exercises a broad ministry, including amongst children and vulnerable adults. During the week, parents and carers often drop off and pick up children outside the church, and this venue would be in direct view of these children. There are two other premises within metres of 30 Cambray Place where counselling for victims of sexual assault and those who have left the sex trade take place.

b. Secondly, I object on the grounds of proximity to a place of worship. It is deeply offensive to the many Christians in Cheltenham to license such a premises directly opposite a Christian place of worship.

2. Having witnessed first-hand the melee following the end of a day at the races this year, I am additionally concerned about the safety of women in our town and the impact venues of this sort have on it. Your own survey on the safety of women at night¹ highlights how unsafe women feel in Cheltenham. 75% of our women do not feel safe, and almost a third report regular sexual harassment. Research² has shown that the presence of strip clubs increases violence against women in the local community. I would ask you to consider carefully whether you can tolerate this further risk to our women.

10.

This application if approved will undoubtedly put women and girls at significant risk of sexual objectification, sexual discrimination, sexual harassment and sexual violence in this area of Cheltenham, given the existing criminal activity surrounding human trafficking and sexual

exploitation connected to the Cheltenham Racing festivals this would only serve to compound this elicit behaviour and culture. If the local authority were, to approve this application this would undoubtedly convey the message that they're in agreement and condone the sexual exploitation of women and girls.

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

The negative implications of SEVs on women are outlined below: SEVs normalise the sexual objectification of women in contradiction to efforts to promote equality between women and men. The links between objectification, discrimination and violence against women are recognised at the international level by the legal binding United Nations Convention to Eliminate Discrimination Against Women (CEDAW), which has repeatedly called on states - including the British government to take action against the objectification of women. Similarly, the UK based End Violence Against Women coalition has called on the UK government to tackle the sexualisation of women and girls because it provides a "conductive context" for violence against women. For recent research on this issue see these research findings which show how objectification of women in lads mags is undifferentiable to most people from the language used by sex offenders to talk about their victims (<http://www.mdx.ac.uk/aboutus/news-events/news/mags.asp>). Similar to 'lads mags', SEVs promote "sex-object" culture - the mainstreaming of the sex and porn industries and the ever increasing sexual objectification of women and girls. In addition, the PR makeover of branding lap dancing and SEV 's as glamorous and "harmful fun", have contributed to a significant percentage of teenage girls seeing being a lap dancer as an ideal profession. We need to think about how our culture treats women more generally. Teresa May at the Women's Aid Conference 2010: "It is only when businesses appreciate their responsibility to end the sexualisation of women that some people will stop treating women like objects. And it's only when our communities stand up and say violence against women is unacceptable — that attitudes will really begin to change".

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

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

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

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

11. Alex Chalk MP

I am writing to object to the above application. An SEV at this (or indeed any) location in Cheltenham would be wholly inappropriate, and I urge CBC to use its broad discretion to refuse it.

By way of context, the Policing and Crime Act 2009 reclassified lap dancing clubs as “sexual entertainment venues” [SEVs] and gave local authorities the power, if they adopted the legislation, to regulate such venues as sex establishments under Schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982 [Schedule 3]. The change introduced by section 27 of the 2009 Act was in response to concerns that, under the Licensing Act 2003, local communities did not have sufficient powers to control where lap dancing clubs were established. According to the Home Office Guidance, the reclassification allows local authorities like CBC to refuse a licence application on wider grounds than under the 2003 Act and gives local people a greater say in the licensing process. Indeed, para 1.3 of the Guidance states as follows:

Section 27 gives local authorities more powers to control the number and location of lap dancing clubs and similar venues in their area...these provisions will allow local authorities to refuse an application on potentially wider grounds than is permitted under the 2003 Act and will give local people a greater say over the regulation of lap dancing clubs and similar venues in their area.

As noted above, I would invite CBC to use those powers. I would further note that Philip Kolvin, *Licensed premises: law, practice and policy* (2nd ed), Bloomsbury, 2013, p668 states that the grounds for refusing a licence under Schedule 3 “confer a wide discretion and will not easily be shown to be unreasonable...”

On the specifics of this application, it is noted that Cambray Place is a mixed-use street, made up of commercial but also residential properties. Locating a SEV near to residential properties where children can be expected to come and go would be wholly inappropriate. The proposed operating hours (opening at 6pm or 8pm depending on the day) simply undermine the application further.

Second, the venue is sited near properties which are sensitive for religious purposes – specifically Cambray Baptist Church. The Church holds various activities throughout the week corresponding to times at which the application has been requested. By way of example, youth group activities take place on Friday evenings, during the proposed period of operation of the licence. To have young people walking past a functioning SEV is plainly wrong.

I would be grateful if the above points could be taken into consideration.

12. Councillor Iain Dobie - College Ward

CBC Cabinet Member for Clean & Green

(Waste & Recycling and Parks & Gardens)

Councillor Garth Barnes has confirmed his support for the comments made by Councillor Dobie and he confirmed that he agrees with the points made by him.

As one of the two borough councillors for College Ward (the other being Councillor Barnes) I wish to object to the proposal to licence a Sexual Entertainment Venue (SEV) at the above location in my ward.

My objection is on the specific grounds that

- this is a residential area
- the proposed location is opposite a public house with an outside area that is used by families
- that a church is very close by (immediate line of sight)
- that the application proposes separate and individual booths for the sexual entertainment which I feel would not provide adequate safety and security for the entertainers.

Moreover, I would like the committee to note that I have been contacted by a number of residents who have their own concerns, particularly

1. About the wellbeing of the female entertainers (there is scepticism that regulation by the council provides sufficient protection - it is claimed the dancers are likely to be under coercion by employers to provide formulaic statements of assurance which may not be true)
2. About the likelihood that "punters" will emerge from the SEV in a state that will be more likely to threaten and endanger women they encounter subsequently in our town centre.

I am sympathetic to these concerns from voters.

I have sought - and the media have reported this - clarification from Alex Chalk, MP for Cheltenham and Minister for Justice, as to why the legal loophole continues that prevents a wholesale ban on SEVs in Cheltenham. Despite his claiming to oppose SEVs, and having the power to change the law, I have to date not received a response from Mr Chalk to this challenge.

I would be grateful if you would make public the full text of this objection as part of the Licensing Committee proceedings.

13.

I write to object to the application above on several grounds:

1. The council's own survey in August 2021 showed women did not feel safe at night, and during race week the number of these increased to 75%. If you fully considered these figures from your own survey and their implications, you would conclude this application should not be granted.
2. Faith communities (Christians, Muslims, and Jews for example) find these establishments highly offensive.
3. Other premises nearby cater for vulnerable & frail people, people with mental health difficulties, and children. The Practice rooms and the Counselling Rooms do this, and the Hallowed Grounds (in the forecourt of Cambray church) also caters for such people. For their sake, this application should not be granted.
4. In a similar vein, the Salvation Army is nearby, and as you probably know the S.A. has a major role in helping women trafficked by the sex trade. If you carefully considered their views, you would conclude this application should not be granted.

14.

I am a resident of Cambray Place, Cheltenham, and would like to strongly object to a sexual entertainment license being granted for Jessop House, Cambray Place, Cheltenham, application number 23/01596/SEXA.

I object on the following reasons:

1. Cambray Place, is mostly residential to include families with young children.
2. Jessop House has multiple residential flats either side of the property and in front of the venue. Allowing this application would seriously impact these properties, especially with the license finishing at 5am. This would create an undesirable location for the residents.
3. Jessop House is directly opposite from a popular and well used place of worship. The Church is used by many families as a place of worship, and holds weekly children's clubs, including early Sunday school.
4. The venue is not far from a Children's shop in the high street, which obviously attracts young children.

Jessop House is therefore in a sensitive area, and it would be detrimental to the community of Cambray Place for the Council to approve a sexual entertainment license for this venue.

I would be more than happy to discuss my objection with the licensing committee.

15.

We wish to object to the above application on the grounds that this venue is opposite Cambray Church and neighbours a Mental Health facility which provides help and counselling for victims of sexual assault and for people who have left the sex trade. Thus this conflicts with Section 4.5 dii – “Uses to which other premises in the area are put” and also 4.10c, “Proximity of Place of Worship”.

16.

I wish to make an objection to the aforementioned application due to the fact that the venue is in a residential area used by families (including us, frequently, and we have young children) and is opposite a religious venue.

My wife has already submitted an objection. Can I submit one myself even if we are in the same household?

17.

I would like to register my objection to the extension of licence to the Eroticats in Cambray Place during Horse racing events and at other times Viz: <https://www.punchline-gloucester.com/articles/aanews/eroticats-wants-to-bring-lapdancing-to-new-venue-in-cheltenham-during-race-events>

These kinds of clubs objectify both women and men and should not be encouraged in our town. It is particularly inappropriate that the proposed location is opposite Cambray Baptist Church.

The Lilith Project on lap dancing in three London Boroughs (Eden, 2007) found that there was a “50% increase in reported rates in the vicinity of the clubs and an increase in local people’s feelings of harassment and fear of violence.”

The Centre for Crime and Justice Studies reported that

“women’s sense of safety and wellbeing in public spaces is compromised by the widespread use of sexualised imagery of women and girls in public spaces and by the growth of SEVs such as lap dancing clubs.” (Patiniotis and Standing, 2012)

Leeds used to have a number of these “clubs” and some research revealed the extent of bad behaviour and practice in relation to the performers who have to pay the clubs (not, as one might expect, the other way round)

Experience on women working as lap dancers:

"The management in all the clubs treated the girls very badly, they were discriminatory, frequently derogatory in their comments to and about the girls, they routinely practised favouritism, among the girls who were the high earners, and certainly purposely perpetrated an atmosphere, of intense competition between the girls, it was certainly meant to intimidate us and divide us. The management in all the clubs routinely put on too many girls on a night, so there was intense competition between the girls for the customers. The customers' attitudes varied between politeness to downright hostility and abuse." *Alexandra*

"[The industry is seen as] a dream built on a myth that you can become famous, rich etc., it is perceived as being glamorous, and particularly due to the success of celebrated topless models like Jordan (Katie Price), girls and young women perceive this as being a stepping stone onto greater things, however, for every Jordan there are millions of girls who will never become famous, and will either: go into prostitution as they get older or give up the industry and do something else, but be emotionally and even physically damaged by the industry. The industry by its very nature is highly discriminatory and ageist, it is a certain fact that men want to see nubile young women naked, not 40 year old women, so the very core of the industry is extremely derogatory, and degrading to women of all ages." *Alexandra*

"I don't know any where you get paid a wage. It varies but you have to pay what's called a house fee. You pay club £10 up to £80 for being there. That's not for doing anything. You give them that up front. Then they take a percentage of what you earn. It varies depending on what you earn. 10% if you don't do very well, or 25% if you have a good night. If the managers see you having a good night, they bump up the commission level. Lots of people would lie so they wouldn't have to pay. [there are] lots of hidden costs they don't tell you about." *Sarah*

"You have a code of conduct but it's not adhered to too much. It's just to placate the local authorities. We weren't even encouraged to read it. You just sign it quickly. I was worried about signing it – but it became apparent it was all nonsense." *Sarah*

Women who want to work in these clubs are, at best being exploited and at worst may be trafficked for the purpose. To ascertain which pertains will take considerable Police time and cost to the local tax payers.

Why does Cheltenham Borough Council wish to follow the poor practice in Metropolitan areas when it comes to the safety and well-being of women and girls?

18. Gloucestershire Women's Liberation Collective (GlosWomen)

We are writing on behalf of our members to object to the application submitted by Red Apple Associates Limited to allow for lap dancing at Jessop House, 30 Cambray Place, Cheltenham to coincide with race meets at Cheltenham Racecourse. We are disappointed but not at all surprised that the applicant has submitted an application for year-round lap dancing.

We refer to our letter of objection dated 10 September 2023 which details our concerns relating to the impact on the lives of women and girls of Cheltenham (both women working in the sex trade and women and girls in the wider community), which we believe should be considered as part of Cheltenham Borough Council's Public Sector Equality Duty in deciding the outcome of this application.

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.

We attach the full results of GlosWomen's Race Week survey (Please see '**Appendix**'). As mentioned previously, women reported feeling unsafe in Cheltenham during Race Week and a

number of respondents felt that the presence of lap dancing reinforced the sexual objectification of women and girls.

Sex equality concerns not ‘moral objections’

GlosWomen, along with a number of other objectors, attended and contributed to the Licensing Committee Meeting on 4 October 2023, where a variation of an existing licence at Under the Prom was granted to allow for lap dancing to take place during the November race meet.

We were pleased that objections made on the basis of sex equality concerns were not dismissed by the Licensing Committee as ‘moral objections’, as has been the case previously. We hope this change in approach will allow for more detailed consideration of the impact of the sex trade on women and girls and how this contributes to sexist and misogynistic attitudes that drive male violence against women and girls in society.

It was also positive to hear of the new survey launched by the Cheltenham Community Safety Partnership to understand how safe women feel in the evening and at night in the town centre, as well as a commitment to consult with local women on the proposed Pledge for Women’s Safety.

Public Sector Equality Duty

We were encouraged by the discussion of the Public Sector Equality Duty during the Committee Meeting of 4 October 2023. Councillors asked questions about discrimination or inequality specifically relating to the applicant and the venue. There was also discussion about taking a ‘gender neutral’ approach in terms of the application of SEV policy and consideration of the protected characteristic of disability.

Unfortunately, what councillors failed to do was engage with the wider issues of an industry where women are sexually objectified and the idea that men are entitled to access women’s bodies is reinforced.

As equality law expert Karon Monaghan KC put it to the Women and Equalities Committee in 2018, Sexual Entertainment Venues *“have an impact on the wider community because they promote the idea that sexual objectification of women and sexual harassment commonly in those environments is lawful and acceptable...How are we [licensing SEVs] in the 21st century? We are not going to get rid of sexual violence if we mandate the sexual objectification of women in licensed venues.”*

We were told that there was no evidence in Cheltenham of a link between the lap dancing club and harassment and violence towards women and girls. But research clearly tells us that there is a link between sexist and misogynistic attitudes, a culture that perpetuates and reinforces these messages and the perpetration of sexual violence. Lap dancing contributes to a culture that reinforces sexist and misogynistic attitudes.

- A study for The Journal of Sex Research found that more than half of the men interviewed visited strip clubs to escape social conventions and rules that required them to treat women as equals. One contributor commented that, *“With all of this sexual harassment stuff going around these days, men need somewhere to go where they can act like they want.”*¹

¹ Frank, K. (2005). Exploring the motivations and fantasies of strip club customers in relation to legal regulations. Archives of Sexual Behavior, 34(5), 487-504

- A review for the Government Equalities Office in 2020, found that there was strong evidence of a link between the sexual objectification of women and harmful sexual attitudes and behaviours towards women.²³
- A 2011 research study of women who perform in lap dancing clubs found that over half of participants reported frequent incidents of sexual assault.⁴
- A 2013 United Nations study found that for men who admitted subjecting women to rape, the most frequently cited motivation was a belief in their entitlement to sex.⁵

Councillors must also consider the fact that the majority of sexual harassment and violence is not reported by women and girls. We live in a culture that normalises such abuse, blames women for the violence they are subjected to and, if women do report, a criminal justice system that routinely fails and re-traumatises them.

Our research showed that over half of the women and girls surveyed had experienced sexual comments or noises, such as catcalling or wolf whistling during Race Week, while a third experienced unwanted physical contact of a sexual nature, such as kissing, brushing up against someone.

Councillors have previously heard evidence from the Cheltenham Guardians of the numerous interventions that they have to make during Race Week, to prevent women from being cornered by men.

The Licensing Committee will also no doubt be aware of recent press coverage of Cheltenham Race Week in The Sun and The Daily Star, where a male patron enthusiastically described the lap dancing club and women working there as “three floors of wh***s”. This is derogatory and misogynistic language and an example of the attitudes reinforced by lap dancing.

Supply and demand

It seems clear from the pattern of Sexual Entertainment Venue licence applications (which always coincide with race meets) that lap dancing only becomes viable at times when racegoers, with cash to spend, arrive in town. Even then, it seems that significant effort is needed to drum up business. The applicant always requests variations to the SEV policy standard conditions to allow for leafleting, the running of a minibus (to advertise and transport patrons) and to extend operating hours.

By granting a licence for year round lap dancing, particularly on terms that allow for extended operating hours and advertising and solicitation, Cheltenham Borough Council (CBC) are complicit in

² GEO (2020). The Relationship Between Pornography Use and Harmful Sexual Behaviours: Literature Review.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/952

³ /The_Relationship_between_Pornography_use_and_Harmful_Sexual_Attitudes_and_Behaviours-_literature_re view.pdf

⁴ Sanders, T., & Campbell, R. (2012). The Regulatory Dance: Sexual Consumption in the Night Time Economy – Briefing for Licensing Practitioners. University of Leeds.

⁵ <http://www.unwomen.org/en/news/stories/2013/9/half-of-men-report-using-violence-and-a-quarter-perpetrate-rape-according-to-un-survey>

creating demand for lap dancing, which contributes to a culture that reinforces sexist and misogynistic attitudes towards women.

¹ Sanders, T., & Campbell, R. (2012). The Regulatory Dance: Sexual Consumption in the Night Time Economy – Briefing for Licensing Practitioners. University of Leeds.

¹ <http://www.unwomen.org/en/news/stories/2013/9/half-of-men-report-using-violence-and-a-quarter-per-petrate-rape-according-to-un-survey>

We are often told that CBC's hands are tied in respect of the grant of Sexual Entertainment Venue licences because it is a legal activity and due to the existence of the frequency exemption. However, CBC's own Sexual Entertainment Policy allows for a nil cap for SEV licences.

In respect of the frequency exemption, the relevant legislation does allow for these provisions to be repealed and we would hope that CBC will use whatever influence it may have to call for such a change.

We hope that the Licensing Committee will show their commitment to ending the sexual objectification and commodification of women by refusing this application.

Appendix - GlosWomen's Race Week Survey

Please see separate document

19.

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

My husband and I are appalled by the proposed extension of opening dates and times of this Sexual Entertainment Venue (SEV). Based on information provided by the Licencing Team leader at my request, if approval were to be granted, the SEV could potentially operate between 2-6 days each month, during the week, at weekends and on public holidays, from October to Christmas/New Year and right through to May every year. This substantial increase in frequency and intensification of such use at the application site is unacceptable and we object on the following grounds.

1. Contravening provisions under The Aarhus (or Aarhus) Convention, ratified by the UK Government on 23 February 2005 (see attached)
 - a. All local authorities in the UK (including Cheltenham Borough Council) are bound by UK law to make environmental information easily accessible to the public. Without such information, members of the public are unable to make informed decisions about how proposals are likely to affect the environment in which they live, work, play, interact with each other and enjoy different pursuits. Exemptions to the provision of information may apply if the information relates to sensitive issues like international

relations, public security, commercial and industrial confidential matters, or affecting protected species (under the Habitats Regulations).

- b. Given the significant increase and intensification of use at the application site for SEV, relevant information that is most useful during consultation stage include staff number (including no. of dancers, door security staff, bar attendants); transport arrangements; marketing/leafletting/publicity arrangements at/around the site; arrangements to control queues at the door before/during SEV opening hours; crowd control arrangement including max no. of customers queuing outside the venue, and any overriding reason(s) for the proposal (other than the obvious financial gains for the owners). As members of the public, we also want to know if there any positive spinoffs for the local communities (local businesses and church) that are negatively impacted by this proposal. None of this information is provided by the Council.
- c. There is no information displayed on the Council website despite my email (and verbal) request to the Council Licencing Team. We are concerned that at best, the Council has failed in its duty to disseminate vital information under The Arhus Convention, thus making this consultation a routine exercise of no real substance. At worst, the Council is at risk to be perceived at colluding with the applicant while the applicant is trying to hide things from the public.

2. Inconsistencies with Cheltenham Borough Council SEV Policy Statement (adopted 29 July 2020)

- a. The application site is located directly opposite Cambray Baptist Church on the other side of Cambray Place. Cambray Baptist Church service is well attended every Sunday morning by children, as well as men and women of all age groups and of different nationalities. Evening service is also regularly held at the church. The church building is used throughout the week/weekends. Throughout the week, Cambray Church runs meetings during the day and evening for church members, and holds events and outreach activities for kids, youths (aged 7-9 and 10-13), young adults, pensioners. Hallowed Grounds, located at the church forecourt at Cambray Place, welcomes passersby who are not church goers and offers them coffees, cakes and a listening ear particularly to those more vulnerable members of the society.
- b. The application for extended dates and opening times will be extremely insensitive to a religious organisation and its ongoing/future/planned activities. Currently Rodney Road is a busy road with on-street parking on both sides and narrow pavements, it is unsuitable location for dropping off/picking up people attending church activities after dark. Cambray Place offers a better alternative as it is well lit and relatively safer for church users waiting (on foot/in the car) to pick up and/or drop off their kids and other vulnerable persons at church events. We are concerned that extending the opening dates/times at the SEV will make Cambray Place more intimidating and potentially unsafe (from a safeguarding perspective), making it easy for vulnerable young people to be targeted, and potentially discriminating against any current/future church after dark/evening activities for children, women, young persons or families.
- c. Council's SEV Policy Statement also identifies the presence of residential properties as a factor in considering the location and use of an SEV. Cambray Place is predominantly residential in character with some retail and commercial uses located closer to the pedestrianised High Street. Apart from Cambray Place, residential properties are also located on Selby Lodge, Cambray Court, and Wellington Street, all within easy walking

distance from the application site. The proposal favours the SEV workers/users but is biased against women, kids, young children, young families, elderly and other vulnerable residents living in the vicinity of the application site. Residents who want to walk to the High Street shops (e.g. Tesco Express, Superdrug, John Lewis, Soho Coffee, Costa Coffee, Tailors, The Entertainer etc) will have no choice but to walk past the SEV and its potential customers queueing or loitering around at Cambray Place most likely under the influence of alcohol or other abuse substances.

- d. There are also two other mental health facilities at 33 Cambray Place and 10 Bath Street, which offer counselling and support to victims of sexual assault and persons who have come out of the sex trade. The proposal, if approved, is insensitive to the staff who work at the facilities and needs of the users.

3. Public Sector Equality Duty (PSED)

- a. Cheltenham Borough Council's recent survey of safety of Women at night (August 2021) has identified the following findings which are of relevance to the consideration of this application:

- an overwhelming majority of respondents (72% out of 638 respondents) that they don't feel safe at night. (This percentage rose to 75% during race week.)
- 30% of respondents said they get regularly sexually harassed.
- 33% of the respondents said those unwanted behaviours are regularly happening in pubs and clubs.
- 94% of respondents also reported that they have changed their behaviours following their experiences.

- b. The SEV is not exclusive to visitors to the races. Increased use of the venue as a SEV will encourage the loitering of potential SEV users (or other undesirables) around the area waiting for the SEV to open or when it is open. Realistically, the SEV as a business can only employ security staff to manage queuing outside its premises. It has no responsibility or control over anti-social behaviour from public loitering in the vicinity of its premises.
- c. For women (particularly those who do not work in night clubs or the sex entertainment industry), there is a genuine fear of unwelcomed, unsolicited, unprovoked anti-social behaviour (jeering, name calling, wolf whistling, being shouted at across the street etc) from men who are waiting outside or loitering around night clubs/SEVs during the day/night. To anyone who has not experienced this behaviour first-hand, the fear is only academic. Many years ago I experienced this while working in a city centre office (in Birmingham) near those venues. The experience of being harassed (on a quiet street during the day) because I was a lone ethnic minority female was frightening; it made me feel very vulnerable and unsafe. Nowadays I tend to avoid any parts of a town or city during the day/night particularly if there is a night club/SEV around and I am on my own.
- d. Based on my experience and the findings from the Council's own survey of Women safety at night, I believe that this proposal will only add to the risk of women being targeted near venues like this SEV, thereby being discriminated against and put at risk by the Council's own licencing regime if this proposal is permitted.

Based on the above, we urge the Licensing Sub-Committee to reject this proposal.

(Please see separate PDF, '[ArhusConvention_UK Parliament](#)')

Copy of email from x:

Dear Jason

Thank you for your time earlier this morning, and for providing me with additional info on the proposed variation of operating hours/times. I will access the link to minutes of the Licensing Subcommittee meeting last Nov when the SEV application was discussed.

Thank you also for confirming that the deadline for consultation is 13/11/2023. May I suggest this date be added to the council website to provide clarity.

From our conversation, it would appear that the applicant has submitted more information but it has not been disclosed on the council website. In the spirit of openness, transparency and fairness, basic info relating to operations hours, staff no, transport arrangement, likely publicity including advertising/ leafleting/soliciting, justifications etc will be required to help us (members of the public) to make more informed comments regarding the implications of the application. Without the disclosure of such basic information, the council is at risk to be perceived being biased towards the applicant and that the applicant is trying to hide something from the public.

Many thanks again and hope you have a good break.

20.

I am writing to object to this application and the variations requested within it.

Whilst I acknowledge that, under current legislation, there is a frequency exemption which the applicant could use to operate an SEV (subject to the constraints of the exemption and other related licensing legislation), the council has the power to make decisions regarding the operation of the SEV as outlined within their SEV policy statement and their adult entertainment guidance note.

Objection to the entire application

Within the SEV policy adopted by the council on 29th July 2020, Section 11.2.1 outlines the discretionary reasons that the council can refuse an application.

I believe that 11.2.1.d is relevant to this application and provides the council with sufficient grounds to refuse (or restrict aspects of) this application and the variations requested:

d) that the grant or renewal of the licence would be inappropriate, having regard: -

- ***to the character of the relevant locality; and/or***
- ***to the use to which any premises in the vicinity are put; and/or***
- ***to the layout, character or condition of the premises, vehicle, vessel or stall in respect of which the application is made.***

Whilst the location of the venue (but not the paved pedestrian area immediately outside of the entrance to the venue) is (just) within the designated area, S 12.1 and 12.3 of the SEV policy allows the council scope not to licence a venue if it is near other properties with sensitive uses or in sensitive locations (The SEV policy incorrectly refers to section 11.4. This does not exist and should more correctly be referred to as 12.4).

12.4 Properties with sensitive uses or in sensitive locations:

Requires that consideration is given to the following when deciding whether to grant the application and variations:

a) The fact that the premises are sited in a residential area;

b) Whether the premises are sited near shops used by or directed at families or children, or on frontages frequently passed by the same;

c) Whether the premises are sited near properties which are sensitive for religious; and/or

d) Whether the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families.

Location

The location of the venue is on the outer edge of the council's designated area, with the paved pedestrianised area immediately outside the entrance to the venue being outside of the designated area. The venue is located within the town centre, at Cambray Place, and is directly opposite residential locations (flats) and other businesses (Taylors public house & restaurant, a coffee shop and tanning salon) and Cambray Baptist Church which are all outside of the designated area and are directed at families and children.

Cambray Baptist Church and two restaurants all cater for the inclusion of children. The Ox advertises itself as "a neighbourhood family restaurant" and Taylors displays a child's menu for under 12s on its website with a Winnie the pooh colouring template.

Businesses within the designated area and immediately next to the location are Oxfam, a wedding design shop, and a complimentary therapy collective.

Cambray Place and the adjacent streets (such as Wellington Street and Mews) have a significant number of private residences. On several visits to this area, the presence of children at a number of these residences has been evident. Cambray Court, a large residential block of flats, sits at the bottom of Cambray Place. The paved area of Cambray Place is a direct access point for adults (young and old) and children to access this residential area from the High Street.

Objections to the variations within the application (with reference to the council's SEV policy statement and adult entertainment guidance note).

The applicant has requested that on a number of days the hours the SEV operates are extended beyond those noted in General Conditions 1 of the council's SEV policy. Namely that entertainment can commence at 17:00 rather than 20:00 and cease at 05:00 rather than 04:00. (see Appendix 2 for the details provided by the council).

The council's SEV policy (General Conditions, point 1) states that "***adult entertainment will only be allowed within the hours of 20:00 hours and 04:00 the following morning***". If this licence is granted, I urge the council to reinstate these operating hours. This is a measured and pragmatic solution given the sensitive nature of the venue as outlined in the council's own policy.

The venue is currently closed and undergoing refurbishment. There are sensitive areas immediately to the front of the venue, which is (I understand) the only point of access to the venue.

Cambray Baptist Church holds regular events for children and young adults at the church during the days and hours that the venue wishes to operate:

- two youth groups on Fridays 7.30pm-9pm (school years 7 to 9 and 10 to 13, so children aged from 11 to 16)
- BLAST children's club – ages 6-11 Fridays 6-7.30pm

Hickory-Dickory's, the nursery, which is located at Cambray Place is open until 6pm every day.

As noted above the two restaurants at Cambray Place are aimed at families with children.

I have noted at a previous licensing meeting an argument was posited regarding the potential for groups of men to congregate outside the venue if the applied-for hours were not permitted. I would suggest that an easy and implementable solution is feasible.

Based on observations as a resident of Cheltenham who frequents this area and more specifically having visited this area several times following the application, it is reasonable to conclude the residents who live in this location include children and young people.

Additionally, given the number of venues that cater for families with children, it is evident that children and young people will be in the vicinity of the venue at times it wishes to operate, particularly during the Cheltenham Festival, given the extended opening hours that have been previously agreed and have been requested for additional days during the racing calendar.

I believe that the request for entertainment to commence at 17:00 (rather than 20:00) will have a disproportionate impact on the area in the immediate vicinity of the venue and request that the council adhere to the hours currently outlined within their SEV policy.

The venue plans

Having looked at the plans submitted by the venue I would raise the following concerns / questions.

1. It is my understanding, based on the plans, that the SEV will provide entertainment in 30 booths across 3 floors. I understand that there is no "common area" within the venue where entertainment will be provided.
2. Condition 18 of the council's SEV policy states **"that there must be no physical contact between the performer and any member of the viewing public"**.

Furthermore, the council's adult entertainment guidance note states that **"A safe distance of one metre should be maintained between performers and customers"**.

These requirements reflect the very sensitive nature of the entertainment provided at this venue and are there to protect the performers.

Having looked at the plans submitted by the applicant it was not possible to calculate the size / height of the booths. It is therefore not possible for the committee, based on the plans presented, to assure itself that the conditions noted above will be met at this venue.

This is a serious safeguarding risk for the performers and requires urgent clarification by the applicant before the committee makes a decision on this application.

The licensing team were not aware of whether the booths have any doors or other mechanism that can be used to enclose the booth. The plans appear to suggest not but clarification of this would be prudent.

Whilst not required by the council, I would suggest given the nature of this entertainment details regarding any furniture (such as chairs) and any structure, temporary or otherwise, within the booth are provided by the applicant.

3. Floor 2 appears to have an area with booths for performances which double as a changing room for performers. I would suggest that clarity of how this area operates for the privacy, safety and dignity of the performers is sought from the applicant. It would be a safeguarding risk for performers if customers could access this area whilst performers were changing.
4. The plans submitted by the applicant do not appear to include the location of CCTV. I do not know if separate details of CCTV have been provided.

It is well known that most, if not all, CCTV systems have blind spots (areas within the camera's field of view where surveillance coverage is limited or non-existent) which occur due to factors such as camera placement, obstructions, lighting conditions or technical limitations.

Corners, recesses, or areas behind obstacles are common blind spot locations, which will be abundant at this venue given it has 30 booths. Given this venue appears to provide all of its entertainment in booths this is an area of high risk (in terms of safeguarding performers) that merits further evaluation by the committee before a decision is made.

5. I would further reference conditions 31 and 33 (door supervisors) of the council's SEV policy which outline how the performance areas will be supervised by the applicant's on-site team. Given performances are provided in booths (which appear to have solid sides) this will obstruct the view into all areas of the booths. I do not believe that compliance with the conditions can be guaranteed (unless there is a supervisor stationed outside every booth at all times during the operation of the venue). I believe that this creates an unacceptably high safeguarding risk for the performers.

Based on the plans and details observed, I do not believe it is possible for a guarantee of no physical contact or a safe distance of one metre to be given in relation to this venue. I would ask the committee, at the very least, not to permit entertainment in booths.

Wider Context / Commentary

Evidence from SEVs

According to Notbuyingit, a standard lap dance involves *near* sexual contact which makes it almost impossible to tell from club CCTV or even on-site inspections whether or not *actual* sexual contact is happening and 'conditions' and 'house rules' are being breached.

[Background – Not Buying It](#)

Reporting of Sexual Violence

On a wider point, comments made at the 4th October 2023 licensing committee meeting (in relation to there being no evidence of women being subjected to sexual violence) do not take into account with plethora of evidence that sexual violence is under-reported.

It is unequivocal that sexual offences are under-reported. In 2021, the Guardian published data that showed out of 1,000 sexual offences only 145 will be reported to the police.

[Sexual offences: when women report them, what happens? | Sarah Everard | The Guardian](https://www.theguardian.com/uk-news/ng-interactive/2021/oct/02/sexual-offences-when-women-report-them-what-happens)

<https://www.theguardian.com/uk-news/ng-interactive/2021/oct/02/sexual-offences-when-women-report-them-what-happens>

The council's own survey in 2021 returned feedback from the participants that ***“Despite the frequency of these unwanted behaviours, 34% of respondents are not telling anyone about their experiences.”***

Under the Public Sector Equality Duty, the council has an obligation to (all) women within the venue, in the vicinity of the venue and in wider society to eliminate harassment. I am unclear how this obligation is currently being taken into the decision-making process of this committee.

Men's sexual violence against women and girls

Data provided by the council via FOI confirms that during the Cheltenham Festival (March) there is an increase in sexual violence in Cheltenham. Regardless of where this violence occurs, it is incumbent on the council to mitigate the risk to performers, its female residents being subjected to such violence and women in wider society being impacted by men's sexual violence.

Within the Council's 2023 Purple Flag Submission concern is noted, yet again, regarding violence against women and girls in the night time economy.

“Violence against women and girls is of particular concern at present. This can be justified by the responses to recent resident surveys and a 50% increase in the number of sexual offences reported within the Purple Flag area in the last year. Our vision for Cheltenham's ENTE is that it be safe and welcoming for all.”

The following is an excerpt from the Safe and Equal Bristol report: Sexual Entertainment Venues Policy Review (November 2021)

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

This committee and indeed this venue do not operate in a vacuum. Decisions need to consider the increase, in general, of sexual violence in the Purple Flag area, combined with the unequivocal evidence that sexual offences are significantly under-reported. Given the scale of the evidence from SEVs across the UK, I am unclear how it can be argued with confidence that Cheltenham is an exception. I urge the committee to use what powers it has, within the SEV policy that was adopted by the full council in 2020, to mitigate these risks.

Conclusion

Based on the council's SEV policy there are sufficient grounds for this application to be refused due to the sensitive nature of the venue's location and the impact that the venue will have on the character of that location.

Insufficient detail has been provided to show how the venue will comply with the condition regarding no contact between performers and customers. This presents a serious safeguarding risk.

Furthermore, sufficient grounds are contained within the conditions of the council's SEV policy to refuse the granting of the variations requested by the applicant in relation to the time that venue will operate.

Appendix 1

Cheltenham Borough Council's "pledge" and other actions in relation to women & girls' safety

I believe that comments made by Cllr Boyes at the 4th October 2023 licensing meeting merit further scrutiny and a response from the committee / council.

Cllr Boyes referred to the concerning feedback provided by the 2021 survey and provided an update from the member for safety and communities regarding the "pledge" which (along with other commitments made by the council) remains undelivered over two years after the survey was undertaken by the council and actions agreed.

When the results of the survey were published on 12th October 2021 under the banner of "**We asked. You said. We did**", the council committed to progress the following items regardless of whether home office funding was secured:

"Whether the bid is successful or not, we are committing to:

- ***Develop a pledge for women's safety***
- ***Incorporate the pledge within our licensing policy (There was a £0 cost allocated to this action)***
- ***Develop a communications plan to create a culture where sexual harassment is unacceptable."***

[Safety of women in the evening and at night-time - Cheltenham Borough Council - Citizen Space](#)

<https://haveyoursay.cheltenham.gov.uk/strategy/safer-streets-for-women-at-night/>

Indeed, the minutes from the 18th October 2021 meeting include actions for the pledge noted below with delivery milestones beginning in October 2021 and continuing to March 2022.

"We will work to incorporate the pledge within our licensing policy – so that we make signing and implementing the pledge a condition of granting a licence."

"Development work with key partners to refine the four areas of pledge" (October 2021 milestone).

"Bring forward amendments to the council's licensing policy" (March 2022 milestone)

[18 October 2021 minutes \(cheltenham.gov.uk\)](#)

https://democracy.cheltenham.gov.uk/documents/s38549/2021_10_18_COU_Safety_Women_At_Night.pdf

According to its own timeline the council would have been aware in late 2021 that their bid for Home Office funding was not successful.

Following meetings with representatives of the council earlier this year and as at November 2023, I understand that the pledge has not been developed or incorporated into licensing policy.

Cllr Boyes read out an update from the member with responsibility for safety and communities which references that "Covid changed people's behaviour". The council's 2023 Purple Flag

Submission highlights that one area of behaviour that has not changed is men's violence against women and girls.

“Violence against women and girls is of particular concern at present. This can be justified by the responses to recent resident surveys and a 50% increase in the number of sexual offences reported within the Purple Flag area in the last year. Our vision for Cheltenham's ENTE is that it be safe and welcoming for all.”

Within its own remit, it is unclear what actions the council has taken since 2021 to improve the safety of women and girls in Cheltenham, particularly in relation to the night time economy. I would suggest that council provides an update on the commitments made following the 2021 survey, including those noted above along with evidence of the impact of these actions.

Appendix 2

Details provided in relation to the time variations requested by the applicant (provided by the licensing team)

- ***October - 8pm to 5am for: The Showcase Friday & The Showcase Saturday***
- ***November - 8pm to 5am for: The November meeting Friday & The November meeting Saturday.***
- ***December - 8pm to 5am for: The Christmas meeting Friday & The Christmas meeting Saturday.***
- ***January - 8pm to 5am for: The New Years Day meeting 1st January each year & Festive Trials Saturday.***
- ***March - Cheltenham Festival Monday 8pm to 5am, Cheltenham Festival Tuesday, Wednesday, Thursday & Friday 6pm to 5am Cheltenham Festival Saturday 8pm to 5am.***
- ***April -8pm to 5am for: April Meeting Wednesday & April meeting Thursday.***
- ***May - Hunters Showcase Friday 8pm to 5am.***

21.

I wish to object to the license request that has been submitted by Steve Burrows for an SEV at Jessop House, Cambray Place.

Firstly, I find the location of interest. Despite the move, the venue is still outside of the permitted zone and is directly opposite a church, with residential properties very near. The fact that a new venue has been selected but is still outside the council's permitted zone suggests a level of contempt, or at least indifference, to the council's authority and regulations. Once again, I would like to put in an objection that the requested permit falls outside of the permitted zone, albeit just off the high street. The church opposite is an active church with a number of services and events for people of all ages, as such a strip club opposite that is operating up to 11 hours a day is absolutely inappropriate.

At the last meeting I raised the idea that the extension to the last license to include the Nov race meet was a move towards the opening of a strip club at every race meeting. This has been proven true by this application, and as such I wonder how long it will be before this new "luxury tea and coffee house" requests to be turned in to a full time strip club. Is this something that the council

think would benefit Cheltenham? I strongly believe it would have a detrimental effect on the women and girls who live here.

Given that the "loop-hole" of a "pop-up" SEV license still exists, I find it unlikely that the council will agree to this objection. I'm hopeful however that they will listen and accept the concerns that Cheltenham residents have with regards to this license and the commodification of women that it supports. I would ask the council to look at the flyer / leafleting that is done around the town and to really think about whether this is appropriate. I say that this is advertising sexual entertainment away from the venue, and where it could easily be seen by minors. Also, the mini-bus that they claim is put on to make the customers and dancers safer. I question if a service that drives drunk people door to door to pay for erotic dances is there for the customers' benefit or for the benefit of the owner's bank balance.

I would urge the council to set limits on the license as is within their power. During the March meeting Mr Burrows is requesting a license for 11 hours a day. I would argue that if Mr Burrows made use of the loophole and moved the venue nightly, there are not many, if any, that would be able to be open until 5am in the morning.

I have continuing moral objections to the sex industry, but I accept that moral arguments won't be taken in to consideration. Instead, I would hope that the safety of local women and girls matters to the Council. There are an increasing number of us speaking out about how unsafe we feel during race meetings. The granting of this license for all the dates requested will just mean more dates that local women are pushed out of entertainment in the town centre due to tourists making them feel unsafe.

I strongly object to this license on my own behalf and also on behalf of the 3 Counties branch of the Women's Rights Network.

22.

I am writing to object to the application for a sex establishment licence for 30 Cambray Place, ref 23/01596/SEXA

My objection is on the discretionary grounds of sensitive location, the premises being almost opposite the Cambray Baptist Church.

Although the premises are within the Designated Permitted Area, the nature of Cheltenham town centre is that there are still a number of residential properties within the central commercial area (and a desire to create more to address the accommodation shortage, and the decreasing demand for office space). My family and I lived in Cambray Place for several years before moving to our current home.

I continue to be disappointed that neither Cheltenham Borough Council, nor our current or previous MP (Alex Chalk and Martin Horwood respectively) while in government have been willing to address the problem of sex tourism during racing events, primarily during Gold Cup week, but increasingly as demonstrated by this application during other race events. Sex tourism provides no benefit to the town, while creating harms, especially for women and girls living and working in Cheltenham.

23.

I write to object to Red Apple's application for Eroticats to use Jessop House as a sexual entertainment venue during multiple race events as referred to in in Punchline 1st November 2023 ["Eroticats wants to bring lapdancing to new venue in Cheltenham during race events."](#)

<https://www.punchline-gloucester.com/articles/aanews/eroticats-wants-to-bring-lapdancing-to-new-venue-in-cheltenham-during-race-events>

The planned venue sounds like a real asset for the town. It will be a "luxury tea and coffee house" by day and at night transformed into a "fantasy cocktail bar" with seven themed rooms.

Licensing this venue for Eroticats lap dancers would be against the public interest as lap dancing is inherently sexist and harmful. The licensee, Steven Burrows, would profit, and a few women, but most women and girls will be left feeling uncomfortable at best, and most of all like the venue is not for them and the council is not protecting their interests.

Despite this, I expect the council will approve the license application. They will say this is the only legal option open to them, that licensing helps protect women performing in the venues and that sexual entertainments venues can't be blamed for any women or girls feeling uncomfortable or unsafe in town.

They will dodge all questions about their Public Sector Equality Duty, claiming they only need to have "due regard" and no action is required.

If the council feels unable to reject the application, then I ask it to do all it can to ensure the licence conditions reduce harm to performers for the following reasons.

Lap dancing is sexist

Men don't work as lap dancers. If they strip the dynamic is very different. They are on stage as part of a group like the Dream boys or they are paid to work individually. They are not lined up and chosen, or not chosen.

In the July 2019 SEV Policy Review Report, Eroticats reported that male strippers have not applied for work during race week, despite being invited. Eroticats also say they have put on 3 or 4 male strip shows in the past. Strip shows, not lap dancing. If they had been popular they would have continued.

The [Eroticats customer rules](https://democracy.cheltenham.gov.uk/documents/s42723/App_1_d_Customer_Rules.pdf) https://democracy.cheltenham.gov.uk/documents/s42723/App_1_d_Customer_Rules.pdf ask people to "Please behave like gentlemen". The [Eroticats Cheltenham Festival Events page](http://www.eroticats.co.uk/cheltenham-festival) <http://www.eroticats.co.uk/cheltenham-festival> says their "Gold Cup strippers" are part of a "lads night out".

Lap dancing is about men objectifying women. Licensing Eroticats means women are lined up and men choose to pay them, or not, based on their physical appearance.

Lap dancing harms women financially

Some will claim that women working as lap dancers make good money, and that because they have chosen this work it isn't harmful. This includes some lap dancers. They will claim it is empowering and lucrative work, especially while they are still working as lap dancers, and when their employer is present. This might be true for some women, especially house mothers, those responsible for managing other women. But it's also fair to say it's embarrassing to admit that you didn't make money, that men didn't want to pay you for a lap dance.

The Nordic Model Now booklet "[What are we talking about when we talk about the sex industry?](https://nordicmodelnow.org/2023/02/03/what-are-we-talking-about-when-we-talk-of-the-sex-industry-booklet/)" <https://nordicmodelnow.org/2023/02/03/what-are-we-talking-about-when-we-talk-of-the-sex-industry-booklet/> states

"Strip and lap dancing clubs in the UK are invariably profoundly precarious and exploitative workplaces for women, providing no job or income security. Women have to pay 'house fees' to the club with no guarantee they will recoup all or any of it. 70% report losing

money...This means clubs displace the financial risks onto the women while securing their own commercial success.”

The Eroticats [License to Occupy Space](#)

[https://democracy.cheltenham.gov.uk/documents/s42732/App 1 m Licence to occupy space 1.pdf](https://democracy.cheltenham.gov.uk/documents/s42732/App%201%20m%20Licence%20to%20occupy%20space%201.pdf) on the Cheltenham website, states:

The fees payable by the Dancer to the Owner for License shall be as follows:

- 4a) £60 per evening
- 4b) 25% of such sum as may be paid by the customer to the Dancer in cash
- 4c) 35% of any credit card payment collected by the Dancer from the customer
- 4d) Any fine levied under the Code of Conduct

I couldn't find the Eroticats Code of Conduct, so I don't know what fines are listed there, but the Eroticats [House Rules](#) [https://democracy.cheltenham.gov.uk/documents/s42733/App 1 n House Rules.pdf](https://democracy.cheltenham.gov.uk/documents/s42733/App%201%20n%20House%20Rules.pdf) on the Cheltenham Council website state:

2. House fees to be paid in full on signing in, no refunds will be given
3. Arriving late increased house fee will be charged
4. Leaving early check out fee will be charged, unless agreed with House Mother.
5. Cancelling with 24 hours notice. Cancellation fee of 25% of house fee will be charged.

So it's very feasible that a lap dancer could end up in debt to Eroticats, and feel obliged to pay off her debt by working for a different Eroticats service, such as live cams or gentlemen's evenings, as listed on the Eroticats website www.eroticats.co.uk

The women who do this work are less likely to be in a financially stable position, and yet they have to pay to work and are subject to fines. They need to be warned of the financial risks, and protected from financial harm.

The [SEV Policy Review meeting 17 July 2019](#)

[https://d.docs.live.net/ff1d2429103b65f4/Documents/RadFem/Glos women/Eroticats/House rules and licence to occupy space/2020_07_29_Adoption of revised Sexual Entertainment Venue Policy_appendix 3_policy review meeting mi.pdf](https://d.docs.live.net/ff1d2429103b65f4/Documents/RadFem/Glos%20women/Eroticats/House%20rules%20and%20licence%20to%20occupy%20space/2020_07_29_Adoption%20of%20revised%20Sexual%20Entertainment%20Venue%20Policy_appendix%203_policy%20review%20meeting%20mi.pdf) (cheltenham.gov.uk) states that the licensing team intervened to ensure a lap dancer who complained got a refund. Can they do more than this?

Or perhaps this is a Trading Standards issue, I notice the [Advertising Standards Authority Non-Broadcast Code](#) https://www.asa.org.uk/type/non_broadcast/code_section/20.html states “Marketing communications for business opportunities must neither contain unrepresentative or overstated earnings figures”.

Lap dancing harms women emotionally

Choosing to work as a lap dancer doesn't mean it isn't harmful.

Women who end up as lap dancing are more likely than other women to have been raped and/or sexually abused. Lap dancing doesn't help these women recover, it makes things worse. The Not Buying It report. [Still Stripping The Illusion](#) <https://notbuyingit.org.uk/wp-content/uploads/2022/01/Still-Stripping-the-Illusion.pdf> states:

- Being objectified and/or objectifying yourself is harmful, regardless of whether it is chosen. Psychologists describe it as a form of insidious trauma .
- Behaving sexually and exposing yourself for men in an exchange that is not based on mutual desire is harmful. Doing this for men who have bought you to behave this way (often

multiple times a night), for whom you have no desire/interest (and who might even repulse you) is psychologically damaging.

- Providing the 'girlfriend experience' is equally part of the work. Women must sit with men, sometimes for hours on end, feigning interest and desire. 'You can never be your true self', 'it is all an act', 'having to hang on a punter's every word, act interested'. Many women describe this as one of the hardest parts of the job, not least because they cannot dissociate.

You don't get this kind of emotional trauma from bar work, or from having a mean boss. Lap dancing is not just another job, it's inherently harmful. Acknowledging the harm done can help women recover. Dismissing it as a "choice" reinforces the harm.

Lap dancing harms women physically

The Nordic Model Now booklet (ref above) states "Like other areas of the sex industry, lap dancing and stripping revolve around presenting and maintaining yourself as a sexual object for the benefit of random men, pandering to their egos and accepting the kind of behaviour that would be considered sexual harassment in other workplaces. Men assaulting and stalking the women is common. All this can take a heavy physical, mental and psychological toll on the women."

There is no record of any incidents in the venue being reported to the police but this doesn't mean they don't happen, it just means that both Eroticats and the Council need to do more.

Eroticats data monitoring:

The report of the [SEV Policy Review meeting 17 July 2019](#) suggests that Eroticats keeps a close eye on their staff:

"On the database they keep a record of everyone who has ever worked for Eroticats including information regarding their conduct and behaviour, they also keep an incidence log and incidents are rated from severe to minor. They have had situations whereby they haven't invited people back."

Unfortunately Eroticats doesn't seem to monitor customers in a similar way, despite presumably having a considerable database thanks to collecting phone numbers from those using the bus, and email addresses from those registering for services and requesting information on the Eroticats website.

Alongside this, the Eroticats licensee Steven Burrows is a member of Nightsafe, which monitors people using various venues in Cheltenham and shares information.

And yet at the 4th October licensing meeting he was unable to provide any general statistics about the reasons for customers being refused entry, or the numbers refused.

Perhaps Cheltenham could follow the example of [Sheffield Council's Sexual Entertainment Venue Licensing Policy](#) and apply the following license condition:

"The licence holder must maintain an incident log of any person(s) refused entry at the premises and record the reason why such persons were refused entry. The log shall be retained for a period of 12 months and the licence holder shall make the log available to any Police Officer or authorised officer of the Council on request."

Council data monitoring:

General statistics are also important. Cheltenham Community Safety Partnership is running a [survey about how safe women feel in the evening and at night in the town centre](#) <https://www.cheltenham.gov.uk/news/article/2843/feeling-safe-and-enjoying-cheltenham-s-night>

[t time economy](#) . They have also made a commitment to consult with local women on the proposed Pledge for Women's Safety.

This is encouraging; however the survey is not collecting data about respondents' sex, male or female, which could mean it is failing to meet its responsibilities under the Public Sector Equality Duty.

The closest it gets is question 15 about "gender identity", whether someone has a sense of themselves as male, female, non-binary (neither male nor female) or something else.

It's reasonable for the council to ask about gender identity, even though it is gender reassignment rather than gender identity that is a protected characteristic.

But "none" should be an option, just as it is for religion. And asking about gender identity doesn't remove the need to ask a person's sex.

Meaningful data is important if the council is serious about improving women and girls safety.

Thank you for giving me the opportunity to object. I am sure that you have the best intentions and hope that these points will help you improve the safety of women and girls in Cheltenham.

24. Gloucestershire Rape & Sexual Abuse Centre (GRASAC)

On behalf of GRASAC, I am seeking those making the decision regarding this licence request to reject this application (renewal) on the basis of their duties under the Public Sector Equality Duty within the Equality Act 2010. Cheltenham Borough Council has previously taken the time to survey residents of the town (2021) regarding the safety of women in the night-time economy and the response rate was high. A second survey is currently underway (closing date 31 January 2024) therefore safety of women and girls in Cheltenham is clearly a real issue. The outcome of the 2021 survey (638 respondents) reported as follows:

- 72% of respondents told us that that they don't feel safe at night, rising to 75% not feeling safe during race week.
- 30% of respondents told us that they get regularly sexually harassed.
- 33% of respondents told us that these unwanted behaviours are happening regularly in pubs and clubs.
- Despite the frequency of these unwanted behaviours, 34% of respondents are not telling anyone about their experiences.
- And 94% of respondents told us that they have changed their behaviours following their experiences.

Anecdotally we hear from GRASAC staff and our clients, as well as university students, that they all change their behaviour during major race weeks. University lectures are cancelled for the Cheltenham Festival race week, women change their habits in terms of not going running or participating in social and sports activities around the town. In relation to this a specific survey question around respondents changing behaviours, only 6% of respondents had not changed their behaviour during the evening in order to keep themselves safe. In this regard, the Council has a duty to eliminate discrimination, harassment, victimisation under the Equality Act 2010 and GRASAC on behalf of its clients, would expect and hope that the Council will do all in its power to ensure the safety of women and girls in the town. By considering this licence application to have the option to operate during all major race events this is completely contrary to the surveys that the Council have

and continue to undertake, where the Council says it takes violence against women and girls seriously. GRASAC are aware that under the current legislation, licenced premises can provide entertainment on an infrequent basis (11 occasions within a 12 month period), but by approving this licence application, over numerous race events – including the New Year ‘family races’ the Council is condoning that women should repeatedly change their behaviour in order to feel safe. I urge the committee to consider the application under the Act, having due regard to its equality duty when making its decision to approve this licence. GRASAC team members have attended the Cambray Place premises during the renovation, in attendance was the Licensing Team Leader, I would ask you to note the following:

- Our acceptance of the invitation to attend and view the premises does not mean that GRASAC condones the granting of licenses to SEVs.
- Neither does our wish to ensure the safety of women attending the premises and/or female members of staff mean that we are ‘working closely’ with the business owner as stated at a previous hearing by the Licensing Team Leader
- In March 2023 the Co-Chair of GRASAC and member of the Council’s committee working to address violence against women and girls delivered a short (maximum 1 hour) introduction to bystander training, and therefore not ‘extensive’ as previously claimed. The Licensing Team Leader has seemingly misunderstood the training given to the Cambray Place staff in March 2023, with the extensive Kindling Bystander Training programme delivered to the Council.
- The objection made by GRASAC is not on moral grounds at all, but the issue of safety for women and girls in the town, now, on multiple days and evenings.

25. The Trustees of Cambray Baptist Church

As Trustees of Cambray Baptist Church we are writing to you on behalf of the Church. Doing so we represent over 300 adults and 100 children and young people of Cambray Baptist Church. We are an active church which engages the community around the church and throughout Cheltenham. The church building and its many activities for children, youth, families, adults with learning needs, vulnerable adults and elderly people is located immediately opposite the site relating to the proposed application.

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

Firstly, sensitivity to proximity to a place of worship. The proximity is clear and evident. Such a venue opposite an active and vibrant place of worship which is open and used throughout most days and in many evenings is an affront and an insult, not only to the people of Cambray Baptist Church, but to all churches in Cheltenham. It is just as offensive to us as it would be to those of other religions whose premises have not been impacted. In days of increased awareness of sensitivity to the views and beliefs of others, the offence the proximity causes cannot be understated. Both press and public will conclude that the council has been negligent, or even wilful, if it permits this licensing application.

Secondly, regarding the Character of the Area. The plans proposed soon after John Lewis opened to refurbish Cambray Place have recognised it as a 'destination' and cafe area suitable for families. The 2011 Census shows that Cambray Place is a residential area, including the flats above the shops that

reach into the Designated Permitted Area. Of the residents, 42% are female, 16% of residences having children in their household, 52% of residents are aged 16-34, and 19% of residents aged over 65, with a complex for older people at the end of Cambray Place. The family feel is reflected in the local businesses, such as John Lewis on High Street, the Hickory Dickory nursery 5 doors from the venue site, The Entertainer Toy Shop and a children's Sweet shop very close by on High Street. The Dance School on High Street has classes into the evenings. Cambray Place roundabout is a regular drop-off point for families transporting children to these locations. It is clear that it is an area in which a Sexual Entertainment Venue would be wholly out of character, and certainly is at odds with the Council's own plans for Cambray Place.

Thirdly, regarding the use to which other premises in the area are put, we have already noted the child centric shops and businesses. In addition, Cambray Baptist Church itself is a family church. We have a full-time Children, Youth and Family Pastor because of the extent of our provision for Children and Young People. We provide Youth and children's clubs into the evenings weekly, and Schools events termly in the day. We run the local Community Christmas Market in Cambray Place. We have provision in the day for Mums and non-working mothers and children. We have regular meetings for old people and for adults with learning difficulties, some in the evenings. A thriving Chinese Church also meets on our premises, and again runs events with young people and children in attendance. And we have families who frequent our Coffee shop and other local coffee shops. A Sexual Entertainment Venue within 10 meters is inappropriate. We have already experienced parents (including those who do not attend our church but whose children come to our activities) who have expressed grave concern or have said they would no longer want their children or young people coming to our activities because of the fact that this venue is in the area, and it is very difficult to reassure them when their response is to what they witnessed of the first operation of the venue during Race Week 2023.

Fourthly, regarding the Designated Permitted Area. Your 2020 Policy Statement identifies a DPA outside of which there should be no permitted Sexual Entertainment Venue. Page 1 1 of that policy gives a map of the boundaries. The property in which the venue is cited is on the very edge of that boundary but area immediately in front of the property (i.e. along the edge of its fence and front step) is not within the designated permitted area. You have therefore already decided that immediately outside its door is an inappropriate location. When the site was used during Race Week in 2023 the venue cordoned off an area of the street (i.e. not within the DPA) to queue clients into and out of the property with advertising pictures on the fencing (again, not within the DPA), and sited its staff on the street (not within the DPA) to encourage clients to enter. They distributed leaflets not only within the DPA but were witnessed doing so on multiple occasions in the part of Cambray Place which is outside the DPA. Their minibuses, with clear markings as to the nature of the business, parked outside the church and in parts of Cambray Place which is not in the DPA. Clearly the SEV cannot operate without extending beyond the Designated Permitted Area, and therefore it is an inappropriate place to host the venue.

In summary, there are deeply seated and very strong grounds on every legal point where the licensing Committee are permitted to take a decision to turn down this application. We ask you to use these grounds to turn down this and any future license application.

But, there is a further reason we would wish to point out — an issue of contradiction in the council's own actions and expressed concerns. Your research on "The Safety of women in the evening and at night-time" (see <https://haveyoursay.cheltenham.gov.uk/strategy/safer-streets-for-women-at-night/>) points clearly to the problem of woman's safety and security in Cheltenham, with 72% not feeling safe at night and 33% reporting unwanted behaviour in pubs and clubs. 94% of respondents said they had to change their behaviour as a result of their experience. Being a part of the community in Cambray we have been approached on many occasions by women to express fears

and concerns regarding the SEV, and its presence is causing women to change their behaviour during its operation — clearly exacerbating the very issue that the council says it wishes to respond to. There is a clear mismatch between the licensing extensions for the SEV and council policy on woman's perceptions and experiences of sexual violence and safety.

We highlight all the above points as strong reasons why this application for a license and/or license extension should not be granted to operate a Sexual Entertainment Venue in this location. Your due consideration to our objections is vital to this church and our legal rights to freedom of worship and belief.

We are aware that you do not permit 'moral' grounds for objection, even though any decision on this matter by the licencing committee is, de facto, a moral decision. We have therefore excluded such grounds in this letter but would be happy to discuss such matters, which are not trivial and should not be so readily dismissed.

Thank you for your careful consideration of this letter of objection.

26.

I write with regard to 30 Cambray Place (formerly Wild Beer Pub, immediately opposite Cambray Baptist Church). I note that the business applied for a 'Sexual Entertainment' licence last October, and the Cheltenham Borough Council granted them a licence for the March 2023 Gold Cup races. I note that they have applied for an extended licence to cover all race events from 8pm to 5pm October to May. I understand that this will mean two to three days every month for 8 months of the year.

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

- o Character of the Area (4.5di and 4.10):
- o This proposal is contrary character of the area. This is as it is largely residential and catering to families. In particular the Cambray Baptist Church and the dance school which both host a range of activities catering for families. Also, there is day care there which provides services for families. There is also the nearby shop Entertainer which sells toys for children.

o Use to which other premises in the area are put (4.5dii and 4.10 b & d refer~~S~~):

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

o Proximity to a Place of Worship (4.10c):

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

●Women's safety concerns:

I refer in particular to Cheltenham Borough's own survey "Safety of Women at Night" which was presented on 18 October 2021. The Executive Summary itself begins "The council and its partners have been concerned about the safety of women at night for a number of years

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

27.

I would like to object to the above referenced application.

This is inappropriate for our town and specifically is in an area used by families and people of Christian faith. It is very close to a place of worship, a support centre, dance school, toy shop and generally in an area used by families.

Time has been taken to make this area one where people can walk and relax. It is well lit for people to walk through and has been made safer by the lighting and pedestrianisation. Therefore, families will be walking through and being met with behaviours that are inappropriate.

I urge you to reject this application.

28.

I am writing to object to the application for the extension of the licence for the Sexual Entertainment Venue to operate regularly from November through to May, according to the timing of race meetings.

The location of this venue, opposite the main entrance of Cambray Baptist Church, is offensive to those worshipping there. I am one of many involved in the extensive children's and youth work there and am concerned about the detrimental effect such a venue might have on the children. There are also other businesses focusing on children in the vicinity such as "The Entertainer", a dance school and the local nursery school.

In view of the above, I would urge you to deny this extension to the Sexual Entertainment venue.

29.

6th November 2023

30 Cambray Close - 23/01596/SE+A.

Dear Sir or Madam,

I am writing as a frequent visitor and appreciator of Cheltenham regarding proposals that 30 Cambray Close be licensed for an extended period for 'Sexual Entertainment.'

Cheltenham has a deserved reputation as a family-

-friendly town. We often walk through town with our three young children, and enjoy the many things Cheltenham offers. A business related to sexual entertainment, therefore, would be incongruous with the town's character, and that of the local neighbourhood which includes residences and the sorts of shops children frequent. Moreover, it strikes me that this sort of business will do Cheltenham's reputation and long-term prosperity no good, given its family-focused demographics.

It should also be borne in mind that there is a place of worship nearby. For the sake of community cohesion and the respect for people of all faiths and none, it would seem further licensing of sexual entertainment shops will not help to make all people ^{feel} part of the Cheltenham community.

In summary, I would urge the Committee consider the potentially deleterious effects of expanded licensing of a sexual entertainment venue at 30 Cambrey Place, particularly in relation to Cheltenham's character, reputation as a family-friendly town, and respect for Cheltenham's diverse religious communities.

Yours sincerely,

30.

Dear Sir/Madam,

I believe that an establishment at 30 Cambrey Place (formerly the Wild Bear Pub) in Cheltenham has applied for extended licensing for a Sexual Entertainment License to cover all race meetings at Cheltenham Racecourse.

(Reference 23/01596/SEXA)

I would like to object to this on the following grounds.

A place of sexual entertainment goes completely against the character of the area. Cambrey Place is a residential street and a family shopping area close to the high street. Family members, especially the young and the aged, should feel safe in this environment.

There are businesses in the vicinity that provide for children and vulnerable adults. I refer especially to mental health facilities at The Practice Rooms (33 Cambrey Place) and the Counseling Rooms (10 Bath Street).

The establishment at 30 Cambrey Place is almost directly opposite to Cambrey Baptist Church, a place of worship set up over 150 years ago and still active. I believe that "Proximity to a Place of Worship" is stated in your own guidelines as a cause of objection. The Church has activities on weekday evenings, as well as on Sundays, where children and elderly folk are dropped off and collected in Cambrey Place.

I hope you will give this matter careful consideration.

Yours Sincerely,

31.

I would like to object to the granting of this license to Red Apple Associates on a permanent basis on the following bases due to the nature of their business.

It is obvious that the Cheltenham Races bring a large amount of business to our town. The owners of the business intend to run this as a sex entertainment venue (SEV) or a strip club. However, the Home Office guidance says that SEV's are establishments that provide lap dancing, pole dancing, table dancing, strip shows, peep shows and live sex shows, and this is not an exhaustive list. Red Apple Associates are registered to an address in Tewkesbury where another business belonging to a different man is also registered which is based in Gloucester selling adult entertainment. Although the owners are not registered on each other's limited company it is not a stretch to see that they work in synergy given that the guidance from the Home Office about issuing SEV license providing such wide scope.

It is inappropriate that this type of business would be located one minutes' walk from a children's nursery, (Hickory Dickory's Day Nursery) which has been open for 24 years. The venue will be less than 5 minutes from the High Street and the Promenade. Many of the shops on the High Street are geared towards children,

i.e. toy shops, sweet shops and there are numerous residential buildings in Cambray Place. The venue is also directly opposite a place of worship, where there is also a coffee venue which hosts individuals with mental and physical disabilities.

The licensing objectives as stated in the Cheltenham Borough Council licensing policy statement are:

- a) The prevention of crime and disorder;
- b) public safety;
- c) The prevention of public nuisance;
- d) The protection of children from harm.

This license should not be granted on all of the above objectives. Whilst the applicant has asked for limited use for this venue on race days, if the license is granted, an extension of the boundaries can be pushed wider and wider, since there would be no initial objections to the issuing of the SEV licence.

A survey undertaken in 2021 to help understand how safe women are feeling in the evening and at night in Cheltenham's town centre revealed that 72% of respondents do not feel safe at night, rising to 75% not feeling safe during race week.

Our local MP, Alex Chalk, has raised a standing objection to the licensing of SEV's in Cheltenham and would prefer that no licenses at all were granted. The rowdy behaviour and drunkenness that already takes place in Cheltenham during race days, and particularly Gold Cup week, will only be exacerbated by the issuing of this licence.

32.

I am writing to object to the granting of an SEV license to Red Apple Associates (23/01596/SEXA).

Sex work has no place in modern society. It is disrespectful to women, objectifying them. The women are frequently trafficked or vulnerable women who have no alternative. The women and

girls of Cheltenham also suffer the consequences of men visiting the town just to visit venues like this. They feel less safe on their own streets.

Please refuse this licence.

33.

To whom it may concern,

I am writing to you to object to the extended Sexual Entertainment License request made for 30 Cambray Place, Cheltenham.

Firstly, a license of this nature is offensive to the Christian community, of which one active church congregation is in very close proximity (Cambray Baptist Church). The proximity of the proposed venue to a place of worship is highly offensive not just to the individual congregation meeting there but, by extension, all other Christian communities in Cheltenham. It also offends other faith communities located around this area of Cheltenham.

Secondly, children and families and other vulnerable groups are attracted to this area through many businesses and organisations located there, including children's toy shops, local coffee shops and a dance school. The Baptist church includes many families and elderly people in its congregation and attracts children to its activities and groups. It is important that the public and church congregation can be confident that the area will be safe, particularly in evening activities conducted there.

Thirdly, there are two facilities for mental health situated close to the venue; one on Bath Road and one also on Cambray Place only a few doors away. Part of their work is to assist victims of sexual assault including those who have previously been involved in the sex trade, therefore a license of this nature granted where these vulnerable groups are attracted is particularly concerning.

I urge the committee to concur that, due to these many concerns, the correct decision is a rejection of the license request.

34.

To whom it may concern,

I am writing regarding the licensing of a new strip club at 30 Cambray Place, Cheltenham (23/01596/SEXA). As a resident of Cheltenham I have many concerns about these plans as I will outline here.

As a mother of daughters who attend dance classes in Cheltenham, I am aware that this kind of entertainment venue makes women and girls more likely to be attacked. In August 2021, you ran your own survey into women's experiences in Cheltenham, showing that women feel unsafe in Cheltenham at night, particularly in race week. The particular location of this proposed club, makes this all the more alarming: there is a popular dance school in the area and two mental health facilities in the vicinity that specifically care for people who have suffered sexual abuse and/or have come out of the sex trade. These people are particularly vulnerable and should not be put in more danger.

The general location of the club is also largely residential and home to a daycare centre, coffee shops and other places where families socialise. These people should be kept safe from the dangers that a strip club presents. They should also have the right to decide at what age their children should be taught about such places, rather than having the conversation forced upon them at a young age.

Finally, the proposed site of the strip club is directly opposite a place of worship. It is offensive and disrespectful to Christians that you would allow such a controversial venue so close to their church. The church also runs events for children and vulnerable people who are dropped off during the day and the evenings. It is important for these individuals that they can feel safe, secure and respected.

Thank you for your time, I sincerely hope that these plans will be abandoned, for the good of the Cheltenham community.

35.

I object most strongly to the above license application for the following reasons:

The proposed venue is in a residential area.

There are flats above the shops that reach into the Designated Permitted Area. It is a family friendly area, with cafes, and The Entertainer Toy Shop and a sweet shop very close by on the High Street. The Dance School on the High Street has classes into the evening. The Hickory Dickory nursery is 5 doors down from the venue site. The Cambray Place roundabout is a regular drop off point for families transporting children to these locations. A sexual entertainment venue is completely out of character with the family friendly area.

The proposed venue is sited opposite Cambray Baptist Church which is sensitive for religious purposes. The family friendly church, which has provision for children and young people, is open and used most days and in many evenings

When the site was used during Race Week in 2023, the venue cordoned off an area of the street (which is outside the Designated Permitted Area) to queue clients into and out of the property With advertising pictures on the fencing and sited it's staff on the street, outside the Designated Permitted Area , to encourage clients to enter. Their minibuses , with clear markings as to the nature of the business, were parked outside the church and in parts of Cambray Place.

This is against Cheltenham Borough Council's standard conditions in their own Policy Statement, which I state below.

"Cheltenham Borough Council

SEXUAL ENTERTAINMENT VENUE POLICY STATEMENT APPENDIX 1

Standard conditions regarding sexual entertainment venues
General Conditions

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." This again shows how inappropriate this location is for a sexual entertainment venue.

Cheltenham Borough Council are aware of the problem of female safety in Cheltenham Town Centre in the evening and at night due to the findings of a survey presented at a council meeting on the 18th October 2021, during it was stated to "develop a pledge for women's safety" and to "incorporate the pledge within our licensing policy".

As a female resident, who lives nearby the proposed venue, and who already does not feel safe and secure in Cheltenham Town Centre in the evening and at night, I am extremely concerned should this proposal be permitted. As the clients to this venue will, in all probability, be male, permitting this proposal will be to the detriment to the safety of females and would be against the Equality Act 2010.

I ask you please to refuse this application.

36. The Nelson Trust

Dear Members of the Licensing Committee,

The Nelson Trust is writing to emphatically oppose the license application submitted by Red Apple Associates Limited for operating a lap dancing venue at Jessop House, 30 Cambray Place, Cheltenham, during the dates of race meets at Cheltenham Racecourse. Our opposition, as stated in the one we submitted on September 11, 2023, against the license variation for an SEV by European Events Consultants Limited, remains steadfast and is rooted in profound concerns over sex equality. The strong opposition echoed in the October 4, 2023, Licensing Committee meeting by numerous groups and local residents only reinforces the community's collective stance against the normalisation of SEVs. Our line of reasoning has not changed since September 2023 and as such we submit our original objection below.

We believe that where Sexual Entertainment Venues (SEVs) operate there are always multiple harms that cannot be mitigated. Our objection to this application is based on years of frontline professional experience supporting women involved in the sex trade.

The Nelson Trust is a gender-responsive and trauma-informed organisation that works with women involved in the sex trade in Gloucestershire to help address their complex and multiple needs. There are strong links between lap dancing and selling sex, with a UK Home Office report finding that the majority of lap dancers also sell sex. The longer a woman has been stripping, the more likely it is she will be selling sex (Prostitution_and_Sex_Work_Report.pdf) . Other research studies also indicate that alcohol and drug abuse is standard in the lap dancing industry, if not integral to the job (The occupational milieu of the nude dancer: Deviant Behavior: Vol 18, No 2 (tandfonline.com)), both by dancers and punters. This places women both in and outside of SEVs at even more risk of assault. Research also indicates considerable use of Class A drugs, initiated after entering the trade.

This published evidence supports our experience on the ground; most women we support have been through adverse childhood experiences, have been involved in domestic abuse relationships and often use drugs and alcohol as a coping mechanism. Women often are unable to realise the harms of the sex trade until they are out of it. One of the women we supported to exit wrote her story in her own words, and here is an extract of how someone might end up involved in the sex trade: 'I was forced into selling sex at the age of 17 and it then became a choice I made with an addict's

insane mind that I could fund my habit selling my body. But what I didn't realise is that I was not just selling my body, but I was selling a part of my soul each time I did this. And chipping away at my self-worth, my self-esteem and slowly but surely losing any empowerment as a woman I had or could have.' This woman's story is not uncommon, and it is a voice that does not often get heard, as many women do not have access to support to address their unmet needs and increase their life choices, including the opportunity to exit the sex trade.

The CBC's responsibility to foster good relationships between men and women, in accordance with their Public Sector Equality Duty seems to conflict with the granting of new and/or variation of licenses for SEVs.

After carefully considering the published evidence, the CBC's legal responsibilities, our professional experience, and the voices of women who have exited, The Nelson Trust vehemently opposes the granting of SEV licenses and/or variations to licenses as we believe they are incompatible with women's rights, safety & equality. CBC has an opportunity to show leadership and enforce their Public Sector Equality Duty by rejecting this licence variation application.

We stand with GRASAC, Alex Chalk, MP, and many local people who are objecting to this application. We urge the committee to contribute actively to the council's pledge for women's safety and use its influence and the legal means available to it to close the frequency exemption permitted under UK law. This move would align with the community's aspiration for a safer, more equitable environment.

With kind regards,
The Nelson Trust