

Dear Licensing Team

Date: 4 October 2025

## **SEV Licence Application - 25/01713/SEXR**

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

### **Impact on the lives of women and girls**

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

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

Plan International's recent 'The State of Girls' Rights in the UK Report' (July 2024) made for bleak reading<sup>3</sup>. 93% of girls and young women do not feel "completely safe" in public spaces. For girls and young women in Cheltenham, violence and harassment is a particular issue.

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

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

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

<sup>2</sup> Safe and Equal Bristol Report: Sexual Entertainment Venue Policy Review 2021 - (<https://www.bristolwomensvoice.org.uk/wp-content/uploads/2021/11/SEVReport2021FINAL.pdf>)

<sup>3</sup> Plan International - The State of Girls' Rights In the UK Report 2024 - <https://plan-uk.org/state-of-girls-rights>

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

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

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

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

### **Frequency Exemption**

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

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

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

If CBC continues to grant SEV licences then they must be licenced on the strictest terms possible. Over the time we have engaged in the SEV licensing process, we have seen a consistent watering down of CBC's SEV policy standard conditions in areas such as advertising, soliciting and operating hours - with scant evidence to justify such changes. We note such variations have again been submitted as part of this application.

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

## **SEV Policy Consultation**

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

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

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

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

Yours faithfully

Gloucestershire Women's Liberation Collective (GlosWomen)

## **About GlosWomen**

GlosWomen is a women's liberation collective, bringing together women from all over the county of Gloucestershire, who share a vision of a world where women and girls can live free from male violence and all manifestations of misogyny. We aim to bring about change through activism, discussion and raising the voices of women and girls.

Contact us at: [gloswomen@gmail.com](mailto:gloswomen@gmail.com)