

Objection  
Helen Dawson

I believe that the Licencing Committee will meet on 8 September to agree the licences for three sexual entertainment venues (SEVs) on Prince of Wales Road and one on Dove Street.

### **Public Consultation**

The minimum requirement for a public consultation about the licencing of SEVs has been insufficient to alert people in Norwich who would like the opportunity to comment. The licencing alert system was not used to publicise the consultation. If it had been, local people would have found out about these applications. Norwich City Council refused a petition now signed by more than 300 people asking for the consultation process to be extended to allow them to comment. It has failed to run an open, informed and reasonable consultation.

These SEVs are already operating. Allowing time for reasonable public consultation will bring no economic or other detriment to the businesses. It is public perception that these licences are being slipped under the radar and that the Council does not respect the views of residents.

I have set out my comments below in line with the licencing criteria:

### **Prevention of Crime & Disorder and Public nuisance, to improve Public Safety**

Norfolk Constabulary's website shows that crime, including violent and sexual offences, on or near PoW Rd is reported every month. The impact of SEVs and consumption of alcohol cannot be discounted. The police presence here is vastly disproportionate to other areas of the city, and this must be costly. I see an increased number of homeless people living on the streets in Norwich. Many use PoW Rd to openly beg for money, food, cigarettes and alcohol. The situation may be complex, but challenges around preventing crime and disorder, improving public safety and preventing public nuisance need to be met.

It is significant that new homes being built mean that the area around PoW Rd is becoming increasingly residential (St Anne Wharf, King St, Grey Friars Rd).

It is well documented that fear of crime can be more debilitating to people than crime itself. It is too easy to dismiss and devalue fear of crime because it is an expression of feelings. PoW Rd has a culture that I find unpleasant and intimidating. I avoid walking there both day and night, perhaps putting myself at a greater risk of crime by walking after dark in the less busy back streets.

Some existing local residents have made the Council aware of their own responses to their perceived risks. These may be dismissed as exaggerated, but those feelings mean that the *fear of crime* impacts on residents' lives in the way that they choose to avoid perceived risks. It is not acceptable if local residents have to make a conscious choice to avoid walking or cycling on a main thoroughfare because they perceive it to be dangerous. The owner of one of the lap-dancing clubs stated publicly that he provides an escort to workers each night. Clearly these workers too are, at best, uncomfortable walking alone to their transport at the end of their shift.

A second impact of the fear of crime is that it reduces the positive impact of any crime reduction strategy. These issues are of interest to Norfolk Constabulary and I have copied this to the PCC for his views.

An opportunity exists to engineer a social solution that meets the needs of the increasingly residential local community by broadening the diversity of venues to attract people of all ages and families in this residential area. This should include reducing, or at the very least preventing an increase in, the number of SEVs.

### **To Protect Children from Harm**

PoW Rd is a main walking route into and out of Norwich for by members of the public of all ages, including children going to and from school. Licenced on weekdays from 10.00am until 06.00am the following day, SEVs impact on children leaving primary and other schools in the area. The presence of lap dancing clubs sends damaging messages to children and young people. These clubs affect people on the periphery, not just their customers. There are no clear guidelines regulating billboard advertising, signage and leafleting. A lack of regulation creates a culture where the most vulnerable are not protected. The Council has a responsibility to protect vulnerable members of society.

### **Diversity & Equality**

Whilst diversity and equality is not one of the criteria of the Licencing Committee, it does present part of a social solution to the prevention of crime, disorder and public nuisance, improving public safety and the prevention of harm.

As a local resident, I would like to contribute to the economy of PoW Rd, however it currently presents a culture of drinking places, clubs and food takeaways designed to attract a predominantly young age group. This lack of diversity creates an atmosphere that I find unpleasant and intimidating. This is not only my own experience – 74% of TripAdvisor reviews are “Poor” or “Terrible”.

I am asking Norwich City Council to act now to enhance the atmosphere by increasing the appeal to a greater range of customers - including families and older people. The Council and PCC should work together to protect the vulnerable and reduce real and perceived crime in the vicinity of PoW Road. Meeting these standards is necessary for the Purple Flag award for successful evening economies.

It would be a good start if the number of sexual entertainment venues was reduced - or at least capped at no more than is currently operating.

I believe it is important that Norwich City is, and is seen to be, a reasonable Council that listens to and values the views of local residents. It is, after all, local residents who pay the Council Tax!

Yours,

Helen Dawson

**Norwich City Council Licensing Authority  
Licensing Act 2003**

**Statement of support or objection to  
an application for a premises licence**

<b>Your name/organisation name/name of body you represent (see note 1)</b>	Councillor Lesley Grahame, Thorpe Hamlet Ward
<b>Postal address</b>	7 Railway Cottages, Hardy Road, NR1 1JW
<b>Email address</b>	l.grahame@cllr.norwich.gov.uk
<b>Contact telephone number</b>	

<b>Name of the premises you wish to support or object to</b>	Lace
<b>Address of the premises you wish to support or object to.</b>	75 Prince of Wales Road NR1 1DG

**Your support or objection must relate to one of the four Licensing Objectives (see note 2)**

<b>Licensing Objective</b>	<b><i>Please set out your support or objections below. Please use separate sheets if necessary</i></b>
<b>To prevent crime and disorder</b>	<p>Lace plans to open 8am-5am. The police have recognised a problem by objecting to it 24/7. However policing after 5am, when customers are on their home is sparse. There is an acknowledged risk to performers on leaving clubs, as evidenced by the operators variously escorting them to their transport home, or making them stay until all the customers have left. The latter does nothing to mitigate the risk of punters lingering out of view.</p> <p>See additional sheet</p>
<b>Public safety</b>	<p>There are studies showing that crimes against women increase in areas where lap-dancing clubs proliferate, and in countries where gender inequality is worse. Proliferation makes gender equality worse and increases the risk as well as the fear of crime, and is incompatible with the Norwich's equality policy.</p> <p><a href="https://www.theguardian.com/world/2008/mar/19/gender.uk">https://www.theguardian.com/world/2008/mar/19/gender.uk</a>  <a href="http://www.hertsequality.org/downloads/content/Corporate%20Sexism.pdf">http://www.hertsequality.org/downloads/content/Corporate%20Sexism.pdf</a></p> <p>The Camden study is contested by the industry, as one would expect, but this is neither objective nor conclusive. Local residents are not willing to have the additional risks imposed on them by adding sexual arousal to the mix of alcohol-induced dis-inhibition.</p> <p>The additional risk is further complicated by the location opposite another Sugar and Spice, so there is no option for those who wish to, of crossing the road to avoid an SEV.</p> <p>See additional sheet</p>

<p><b>To prevent public nuisance</b></p>	<p>The presence of SEVs has been shown to increase demand for prostitution in Edinburgh  <a href="http://www.womenssupportproject.co.uk/userfiles/file/uploads/Challenging_Men%C2%92s_Demand.pdf">http://www.womenssupportproject.co.uk/userfiles/file/uploads/Challenging_Men%C2%92s_Demand.pdf</a></p> <p>and sexual violence in Newquay  <a href="http://www.telegraph.co.uk/news/uknews/law-and-order/9284609/Lapdancing-clubs-encourage-rape-and-sexual-assaults-claims-police-chief.html">http://www.telegraph.co.uk/news/uknews/law-and-order/9284609/Lapdancing-clubs-encourage-rape-and-sexual-assaults-claims-police-chief.html</a></p> <p>See additional sheet</p> <p>There is no reason to think these findings would not apply to Norwich, unless Norwich conducts its own research.</p>
<p><b>To protect children from harm</b></p>	<p><i>It is totally inappropriate for a strip club to be open at 8am so close to a school. If the intention is to open later, then an 8am license is totally unnecessary.</i></p> <p><i>The council's licensing policy states:</i></p> <p><i>16.1 Where the activities specified in an operating schedule include striptease, or</i></p> <p><i>any other kind of nudity (e.g. lap dancing, table dancing, pole dancing or topless waitresses) the council will take into consideration any increased risk</i></p> <p><i>to the promotion of the licensing objectives. In particular, the council will expect the applicant to have given particular consideration to the promotion of</i></p> <p><i>the licensing objectives in relation to the protection of children and the prevention of crime and disorder.</i></p> <p><i>16.2 Where applications for premises licences or club premises certificates include</i></p> <p><i>striptease or any other kind of nudity in the licensable activities, <b>the council</b></i></p> <p><i><b>will have particular regard to the location of the premises in relation to places</b></i></p> <p><i><b>of religious worship, schools, youth clubs or other premises where significant</b></i></p> <p><i><b>numbers of children are likely to attend.</b></i></p> <p><i>The emerging SEV policy calls for consideration of</i></p> <p><i>11.1 Relevant Localities</i></p> <p><i>In considering the characteristics of a locality the Licensing Authority shall particularly take account of the density and proximity of:</i></p> <p><i>(1) schools, nurseries, crèches, youth hostels and other similar educational or</i></p> <p><i>recreational facilities attended by children,</i></p>

	<p>(2) parks and children's play areas,</p> <p>(3) residential and sheltered accommodation,</p> <p>(4) religious and community buildings,</p> <p>(5) alcohol or entertainment licensed premises,</p> <p>(6) other retail units (and their uses).</p> <p>Bar 52 is 100m from Norwich Central Mosque, the Evangelical Free Church and Charles Darwin Primary School.</p> <p>The presence of strip clubs sends damaging messages to children and young people in the surrounding area, given how they portray male and female roles and relations. This is harmful to boys and girls who are learning their identities. It is naive to think that the clubs affect only the people who enter them, especially since there are no clear government guidelines to regulate billboard advertising, signage and leafleting for lap dancing in the local areas. See additional sheet</p>
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<p><b>Please suggest any conditions which would alleviate your concerns.</b></p>	<p>Contracts and Living wage for dancers &amp; all staff.</p> <p>Regular, unannounced inspections and enforcement of policy rules. Zero tolerance to harassment/assault +Warnings to men about prosecution of assault</p> <p>Confidential whistle-blowing mechanism</p> <p>Cap on number of SEVs in City/LNAZ/Prince of Wales Road</p> <p>As suggested in Lambeth:  <a href="https://moderngov.lambeth.gov.uk/documents/s32548/02d%20Sex%20Establishment%20Policy%20Stage%202%20EIA%202.pdf">https://moderngov.lambeth.gov.uk/documents/s32548/02d%20Sex%20Establishment%20Policy%20Stage%202%20EIA%202.pdf</a></p> <p>i). Conditions proposed by the Chair of the Institute of Licensing 1. No contact between performers and audience and a minimum of 1 metre separation between performers and audience. 2. Performers confined to stage area. 3. Prevention of fining performers. 4. Zero tolerance policy on customers who break rules of conduct. Contravention warrants a lifetime ban from the premises. 5. Prohibition of private booths. 6. CCTV coverage of all public areas. LBL/PEP/EIA Report Template/V. August 2010/JRT 12 7. Controls on exterior advertising and signage. 8. Prohibition of advertising in public spaces, including on billboards, telephone booth boards, and leafleting.</p> <p>ii). Conditions proposed by the Fawcett Society 1. A register to be kept of all staff working each night and valid proof to be held on the premises of the age of each of the performers. 2. No fee to be charged by any club to a performer for working in the club. 3. Police to be kept informed of any assaults that take place on staff, whether or not the victim wishes to press charges. 4. No smoking areas to be allowed at the front of clubs to minimise the potential harassment of women living, working and passing through the area. All smoking areas must be in private areas away from public spaces. 5. No advertising allowed in media that is not exclusively aimed at adults – this would exclude local and family newspapers for example.</p> <p>These suggestions would help a little, they not outweigh my objection, which would still stand, even if these conditions were</p>
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	met, for the reasons given above and below
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Signed: Cllr Lesley Grahame

Date: 2/9/17

Licensing Members are asked to consider each application on its own merits and can refuse if the number of SEVs is greater than that agreed. However no number has been agreed, they are being asked to do the impossible.

Granting 4 SEV licenses at once, with no cap on the numbers would send a message that Norwich is a soft touch, a destination for stag parties etc, bringing more strip clubs into the gateway to the city. This route from station to Cathedral, City Centre, would become even more of a no-go zone for many residents, especially women, and especially given the very long hours requested in these licenses. While some may consider this desirable, the conversation has not been had and no democratic decision has been made, or can be without further consultation and a review of the policy to decide a cap on the numbers.

I call for a deferral of the decision on the basis that interested people were not given sufficient information, and the regulations that the applications will be judged under are clearly unworkable.

#### Location

The policy allows the committee to refuse an application if it is not suitable for the locality.

In considering the characteristics of a locality the Licensing Authority

shall particularly take account of the density and proximity of:

- (1) schools, nurseries, crèches, youth hostels and other similar educational or recreational facilities attended by children,
- (2) parks and children's play areas,
- (3) residential and sheltered accommodation,
- (4) religious and community buildings,
- (5) alcohol or entertainment licensed premises,
- (6) other retail units (and their uses).

Prince of Wales Road also features almost all the types of location listed above as worthy of consideration in this regard.

#### Duty to promote equality

All local authorities have a legal obligation under the Public Sector Duty of the Equality Act 2010 to eliminate unlawful gender discrimination and harassment and to promote equality of opportunity between women and men. Article 1 of the Convention on the Elimination of Discrimination Against Women (CEDAW) states that discrimination against women means:

*any distinction, exclusion or restriction made on the basis of sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field.*

A report by End Violence Against Women and London Metropolitan University, *Sexualised Sexism: popular culture, sexualisation and violence against women and girls* states that: "Since violence against women and girls is

defined by the United Nations as cause and consequence of gender inequality, rooted in, and also reproducing, disparities in power, economic resources and respect<sup>1</sup>, sexist, sexualised representations of gender play a part in creating environments where violence becomes possible.”

#### Link between SEVs and increased crime

The council’s assertion that there is no link between SEVs and crime and disorder is unsubstantiated. There is clear evidence that women working in SEVs are likely to be victims of sexual violence and exploitation. Research has also found a link between lapdancing clubs and prostitution (see Bindel 2004).

<http://secondaryeffectsresearch.com/files/Edinburgh.pdf>

A report by the Lilith Project which looked at lap-dancing in Camden Town found that in the three years before and after the opening of four large lap-dancing clubs in the area, incidents of rape in Camden rose by 50%, while sexual assault rose by 57%. It also concludes that the existence of lap-dancing clubs has a negative effect on the community, that areas where lap-dance clubs operate have become ‘no-go’ for women who feel uncomfortable walking by, and that men have been harassed by personnel offering them sexual services.

One body of research on strip clubs in the US found that all dancers had suffered verbal harassment and physical and sexual abuse while at work; all had been propositioned for prostitution; and three-quarters had been stalked by men associated with the club.

<https://www.theguardian.com/world/2008/mar/19/gender.uk>

From a Glasgow City Council report on table-dancing:

In the study ‘Stripclubs According to Strippers: Exposing Workplace Sexual Violence’ by Kelly Holsopple published in 1998 (Appendix 1) it is noted that ‘100% of the eighteen women in the survey report being physically abused in the strip club. The physical abuse ranged from three to fifteen times with a mean of 7.7 occurrences over their involvement in stripping. 100% of the eighteen women in this study report sexual abuse in the strip club. The sexual abuse ranged from two to nine occurrences with a mean of 4.4 occurrences over the course of their involvement in stripping. 100% of the women report verbal harassment in the strip club. The verbal abuse ranged from one to seven occurrences with a mean of 4.8 occurrences over the course of their involvement in stripping.’

<https://www.glasgow.gov.uk/CHttpHandler.ashx?id=1776&p=0>

Signed: Cllr Lesley Grahame

Date: 9/2/17

## NOTES

1. In order for you to be able to support or object to an application for a premises licence, your representation must be 'relevant' (i.e. it relates to the likely effect of the grant of the licence on the promotion of at least one of the licensing objectives) and is not frivolous or vexatious.
2. The four licensing objectives are:-
  - to prevent crime and disorder
  - public safety
  - to prevent public nuisance
  - to protect children from harm
3. An application for a premises licence will be notified to residents by displaying it on the premises, in the local press and on the council's website. Comments in support or objections must be made within 28 days of the date given in the public notice.
4. If you have made valid comments of support or objection you will be expected to attend a meeting of the authority's Licensing sub-committee and any subsequent appeal proceeding. If you do not attend, the sub-committee will still consider your comments, but they may not carry the same weight as if you had attended if, for example, the contents are disputed or challenged.
5. Your statement of support or objection will be passed to the applicant to allow them the opportunity to address your concerns in line with the Licensing Act 2003. Your statement, which will include your name and address but not your email address, telephone number or signature, will also be published in the report to the Licensing sub-committee, which is publicly available and displayed on the city council's website.
6. In exceptional circumstances, persons making representations to the licensing authority may be reluctant to do so because of fears of intimidation or violence if their personal details, such as name and address, are divulged to the applicant. Where an authority consider that the person has a genuine and well-founded fear of intimidation, they may decide to withhold some or all of the person's personal details from the applicant, giving only minimal details (such as street name or general location within a street). However, guidance issued to licensing authorities states that withholding such details should only be considered where the circumstances justify such action. If you consider that the contents of this paragraph apply to you please submit with your representation a written justification as to why your personal details should be withheld.
7. Please return this form when completed to:

Norwich City Council  
Licensing Section  
City Hall



St Peter Street  
Norwich  
NR2 1NH

Tel: 01603 212761 / 212760  
Email: [licensing@norwich.gov.uk](mailto:licensing@norwich.gov.uk)

**Norwich City Council Licensing Authority  
Licensing Act 2003**

**Statement of support or objection to  
an application for a premises licence**

<b>Your name/organisation name/name of body you represent (see note 1)</b>	Councillor Lesley Grahame, Thorpe Hamlet Ward
<b>Postal address</b>	7 Railway Cottages, Hardy Road, NR1 1JW
<b>Email address</b>	l.grahame@cllr.norwich.gov.uk
<b>Contact telephone number</b>	

<b>Name of the premises you wish to support or object to</b>	Platinum Lace
<b>Address of the premises you wish to support or object to.</b>	15 Dove Street , NR2 1DE

**Your support or objection must relate to one of the four Licensing Objectives (see note 2)**

<b>Licensing Objective</b>	<b><i>Please set out your support or objections below. Please use separate sheets if necessary</i></b>
<b>To prevent crime and disorder</b>	<p>Platinum Lace Is outside the late night activity zone, and risks diverting sparse police resources from it.</p> <p>See additional sheet</p>
<b>Public safety</b>	<p>There are studies showing that crimes against women increase in areas where lap-dancing clubs proliferate, and in countries where gender inequality is worse. Proliferation makes gender equality worse and increases the risk as well as the fear of crime, and is incompatible with the Norwich's equality policy.</p> <p><a href="https://www.theguardian.com/world/2008/mar/19/gender.uk">https://www.theguardian.com/world/2008/mar/19/gender.uk</a>  <a href="http://www.hertsequality.org/downloads/content/Corporate%20Sexism.pdf">http://www.hertsequality.org/downloads/content/Corporate%20Sexism.pdf</a></p> <p>The Camden study is contested by the industry, as one would expect, but this is neither objective nor conclusive. Local residents are not willing to have the additional risks imposed on them by adding sexual arousal to the mix of alcohol-induced dis-inhibition.</p> <p>The additional risk is further complicated by the location opposite another Sugar and Spice, so there is no option for those who wish to, of crossing the road to avoid an SEV.</p> <p>See additional sheet</p>

<p><b>To prevent public nuisance</b></p>	<p>The presence of SEVs has been shown to increase demand for prostitution in Edinburgh  <a href="http://www.womenssupportproject.co.uk/userfiles/file/uploads/Challenging_Men%C2%92s_Demand.pdf">http://www.womenssupportproject.co.uk/userfiles/file/uploads/Challenging_Men%C2%92s_Demand.pdf</a></p> <p>and sexual violence in Newquay  <a href="http://www.telegraph.co.uk/news/uknews/law-and-order/9284609/Lapdancing-clubs-encourage-rape-and-sexual-assaults-claims-police-chief.html">http://www.telegraph.co.uk/news/uknews/law-and-order/9284609/Lapdancing-clubs-encourage-rape-and-sexual-assaults-claims-police-chief.html</a></p> <p>See additional sheet</p> <p>There is no reason to think these findings would not apply to Norwich, unless Norwich conducts its own research, which it has not to my knowledge done.</p>
<p><b>To protect children from harm</b></p>	<p><i>The council's licensing policy states:</i></p> <p><i>16.1 Where the activities specified in an operating schedule include striptease, or any other kind of nudity (e.g. lap dancing, table dancing, pole dancing or topless waitresses) the council will take into consideration any increased risk to the promotion of the licensing objectives. In particular, the council will expect the applicant to have given particular consideration to the promotion of the licensing objectives in relation to the protection of children and the prevention of crime and disorder.</i></p> <p><i>16.2 Where applications for premises licences or club premises certificates include striptease or any other kind of nudity in the licensable activities, <b>the council will have particular regard to the location of the premises in relation to places of religious worship, schools, youth clubs or other premises where significant numbers of children are likely to attend.</b></i></p> <p><i>The emerging SEV policy calls for consideration of</i></p> <p><i>11.1 Relevant Localities</i></p> <p><i>In considering the characteristics of a locality the Licensing Authority shall particularly take account of the density and proximity of:</i></p> <p><i>(1) schools, nurseries, crèches, youth hostels and other similar educational or recreational facilities attended by children,</i></p> <p><i>(2) parks and children's play areas,</i></p> <p><i>(3) residential and sheltered accommodation,</i></p>

	<p>(4) <i>religious and community buildings,</i></p> <p>(5) <i>alcohol or entertainment licensed premises,</i></p> <p>(6) <i>other retail units (and their uses).</i></p> <p>Platinum Lace is close to shops, theatre church, all attended by children, and the heart of the city, which hopes to be more lively in the evening</p> <p>The presence of strip clubs sends damaging messages to children and young people in the surrounding area, given how they portray male and female roles and relations. This is harmful to boys and girls who are learning their identities. It is naive to think that the clubs affect only the people who enter them, especially since there are no clear government guidelines to regulate billboard advertising, signage and leafleting for lap dancing in the local areas. See additional sheet</p>
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<p><b>Please suggest any conditions which would alleviate your concerns.</b></p>	<p>Contracts and Living wage for dancers &amp; all staff. Regular, unannounced inspections and enforcement of policy rules. Zero tolerance to harrasment/assault +Warnings to men about prosecution of assault Confidential whistle-blowing mechanism Cap on number of SEVs in City/LNAZ/Prince of Wales Road</p> <p>As suggested in Lambeth: <a href="https://moderngov.lambeth.gov.uk/documents/s32548/02d%20Sex%20Establishment%20Policy%20Stage%202%20EIA%202.pdf">https://moderngov.lambeth.gov.uk/documents/s32548/02d%20Sex%20Establishment%20Policy%20Stage%202%20EIA%202.pdf</a></p> <p>i). Conditions proposed by the Chair of the Institute of Licensing</p> <ol style="list-style-type: none"> <li>1. No contact between performers and audience and a minimum of 1 metre separation between performers and audience.</li> <li>2. Performers confined to stage area.</li> <li>3. Prevention of fining performers.</li> <li>4. Zero tolerance policy on customers who break rules of conduct. Contravention warrants a lifetime ban from the premises.</li> <li>5. Prohibition of private booths.</li> <li>6. CCTV coverage of all public areas.</li> <li>7. LBL/PEP/EIA Report Template/V. August 2010/JRT 12</li> <li>8. Controls on exterior advertising and signage.</li> <li>9. Prohibition of advertising in public spaces, including on billboards, telephone booth boards, and leafleting.</li> </ol> <p>ii). Conditions proposed by the Fawcett Society</p> <ol style="list-style-type: none"> <li>1. A register to be kept of all staff working each night and valid proof to be held on the premises of the age of each of the performers.</li> <li>2. No fee to be charged by any club to a performer for working in the club.</li> <li>3. Police to be kept informed of any assaults that take place on staff, whether or not the victim wishes to press charges.</li> <li>4. No smoking areas to be allowed at the front of clubs to minimise the potential harassment of women living, working and passing through the area. All smoking areas must be in private areas away from public spaces.</li> <li>5. No advertising allowed in media that is not exclusively aimed at adults – this would exclude local and family newspapers for example.</li> </ol> <p>These suggestions would help a little, they not outweigh my objection, which would still stand, even if these conditions were met, for the reasons given above and below</p>
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#### Link between SEVs and increased crime

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<https://www.glasgow.gov.uk/CHttpHandler.ashx?id=1776&p=0>

Signed: Cllr Lesley Grahame

Date: 2/9/17

## NOTES

1. In order for you to be able to support or object to an application for a premises licence, your representation must be 'relevant' (i.e. it relates to the likely effect of the grant of the licence on the promotion of at least one of the licensing objectives) and is not frivolous or vexatious.
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7. Please return this form when completed to:

Norwich City Council  
Licensing Section  
City Hall

St Peter Street  
Norwich  
NR2 1NH

Tel: 01603 212761 / 212760  
Email: [licensing@norwich.gov.uk](mailto:licensing@norwich.gov.uk)



**Norwich City Council Licensing Authority  
Licensing Act 2003**

**Statement of support or objection to  
an application for a premises licence**

<b>Your name/organisation name/name of body you represent (see note 1)</b>	Councillor Lesley Grahame, Thorpe Hamlet Ward
<b>Postal address</b>	7 Railway Cottages, Hardy Road, NR1 1JW
<b>Email address</b>	l.grahame@cllr.norwich.gov.uk
<b>Contact telephone number</b>	

<b>Name of the premises you wish to support or object to</b>	Bar 52
<b>Address of the premises you wish to support or object to.</b>	52 Prince of Wales Road

**Your support or objection must relate to one of the four Licensing Objectives (see note 2)**

<b>Licensing Objective</b>	<b><i>Please set out your support or objections below. Please use separate sheets if necessary</i></b>
<b>To prevent crime and disorder</b>	<p><b>Bars and pubs can get around the licensing regime by holding sexual entertainment events on an 'occasional basis'</b></p> <p>If policymakers acknowledge that sexual entertainment requires a specific kind of regulation, then it is inconsistent that they allow venues to hold <b>unlicensed sexual entertainment events</b>, ever. Furthermore, venues hosting infrequent lap dancing events are even less likely to have in place the necessary facilities and security measures to safeguard the female performers, who are thus at higher risk of being victims of crime. See additional sheet</p>
<b>Public safety</b>	<p>There are studies showing that crimes against women increase in areas where lap-dancing clubs proliferate, and in countries where gender inequality is worse. Proliferation makes gender equality worse and increases the risk as well as the fear of crime, and is incompatible with the Norwich's equality policy.</p> <p><a href="https://www.theguardian.com/world/2008/mar/19/gender.uk">https://www.theguardian.com/world/2008/mar/19/gender.uk</a>  <a href="http://www.hertsequality.org/downloads/content/Corporate%20Sexism.pdf">http://www.hertsequality.org/downloads/content/Corporate%20Sexism.pdf</a></p> <p>The Camden study is contested by the industry, as one would expect, but this is neither objective nor conclusive. Local residents are not willing to have the additional risks imposed on them by adding sexual arousal to the mix of alcohol-induced dis-inhibition.</p> <p>The additional risk is further complicated by the location opposite another Sugar and Spice, so there is no option for those who wish to, of crossing the road to avoid an SEV.</p> <p>See additional sheet</p>
<b>To prevent public nuisance</b>	<p>The presence of SEVs has been shown to increase demand for prostitution in Edinburgh</p> <p><a href="http://www.womenssupportproject.co.uk/userfiles/file/uploads/Challenging_Men%C2%92s_Demand.pdf">http://www.womenssupportproject.co.uk/userfiles/file/uploads/Challenging_Men%C2%92s_Demand.pdf</a></p>

	<p>and sexual violence in Newquay  <a href="http://www.telegraph.co.uk/news/uknews/law-and-order/9284609/Lapdancing-clubs-encourage-rape-and-sexual-assaults-claims-police-chief.html">http://www.telegraph.co.uk/news/uknews/law-and-order/9284609/Lapdancing-clubs-encourage-rape-and-sexual-assaults-claims-police-chief.html</a></p> <p>See additional sheet</p> <p>There is no reason to think these findings would not apply to Norwich, unless Norwich conducts its own research.</p>
<b>To protect children from harm</b>	<p><i>The council's licensing policy states:</i></p> <p>16.1 Where the activities specified in an operating schedule include striptease or any other kind of nudity (e.g. lap dancing, table dancing, pole dancing or topless waitresses) the council will take into consideration any increased risk to the promotion of the licensing objectives. In particular, the council will expect the applicant to have given particular consideration to the promotion of the licensing objectives in relation to the protection of children and the prevention of crime and disorder.</p> <p>16.2 Where applications for premises licences or club premises certificates for striptease or any other kind of nudity in the licensable activities, <b>the council will have particular regard to the location of the premises in relation to places of religious worship, schools, youth clubs or other premises where large numbers of children are likely to attend.</b></p> <p><i>The emerging SEV policy calls for consideration of</i></p> <p>11.1 Relevant Localities</p> <p><i>In considering the characteristics of a locality the Licensing Authority shall particularly take account of the density and proximity of:</i></p> <p>(1) schools, nurseries, crèches, youth hostels and other similar educational and recreational facilities attended by children,  (2) parks and children's play areas,  (3) residential and sheltered accommodation,  (4) religious and community buildings,  (5) alcohol or entertainment licensed premises,  (6) other retail units (and their uses).</p> <p>Bar 52 is close to Norwich Central Mosque, the Evangelical Free Church and Charles Darwin Primary School and Orthodox Church in Recorder Road.</p> <p>The presence of strip clubs sends damaging messages to children and young people in the surrounding area, given how they portray male and female roles and relations. This is harmful to boys and girls who are learning their identities. It is naive to think that the clubs affect only the people who enter them, especially since there are no clear government guidelines to regulate billboard advertising, signage and leafleting for lap dancing in the local areas. See additional sheet</p>

<b>Please suggest any conditions which would alleviate your concerns.</b>	<p>Contracts and Living wage for dancers &amp; all staff.  Regular, unannounced inspections and enforcement of policy rules. Zero tolerance to harassment/assault +Warnings to men about prosecution of assault  Confidential whistle-blowing mechanism  Cap on number of SEVs in City/LNAZ/Prince of Wales Road</p> <p>As suggested in Lambeth:  <a href="https://moderngov.lambeth.gov.uk/documents/s32548/02d%20Sex%20Establishment%20Policy%20Stage%202%20EIA%20.pdf">https://moderngov.lambeth.gov.uk/documents/s32548/02d%20Sex%20Establishment%20Policy%20Stage%202%20EIA%20.pdf</a></p> <p>i). Conditions proposed by the Chair of the Institute of Licensing 1. No contact between performers and audience and a minimum of 1 metre separation between performers and audience. 2. Performers confined to stage area. 3. Prevention of fining performers. 4. Zero tolerance policy on customers who break rules of conduct. Contravention warrants a lifetime ban from the</p>
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	<p>premises. 5. Prohibition of private booths. 6. CCTV coverage of all public areas. LBL/PEP/EIA Report Template/V. August 2010/JRT 12 7. Controls on exterior advertising and signage. 8. Prohibition of advertising in public spaces, including on billboards, telephone booth boards, and leafleting.</p> <p>11). ii). Conditions proposed by the Fawcett Society 1. A register to be kept of all staff working each night and valid proof to be held on the premises of the age of each of the performers. 2. No fee to be charged by any club to a performer for working in the club. 3. Police to be kept informed of any assaults that take place on staff, whether or not the victim wishes to press charges. 4. No smoking areas to be allowed at the front of clubs to minimise the potential harassment of women living, working and passing through the area. All smoking areas must be in private areas away from public spaces. 5. No advertising allowed in media that is not exclusively aimed at adults – this would exclude local and family newspapers for example.</p> <p>These suggestions would help a little, they not outweigh my objection, which would still stand, even if these conditions were met, for the reasons given above and below</p>
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Date: 2/9/17

Licensing Members are asked to consider each application on its own merits and can refuse if the number of SEVs is greater than that agreed. However no number has been agreed, they are being asked to do the impossible.

Granting 4 SEV licenses at once, with no cap on the numbers would send a message that Norwich is a soft touch, a destination for stag parties etc, bringing more strip clubs into the gateway to the city. This route from station to Cathedral, City Centre, would become even more of a no-go zone for many residents, especially women, and especially given the very long hours requested in these licenses.

While some may consider this desirable, the conversation has not been had and no democratic decision has been made, or can be without further consultation and a review of the policy to decide a cap on the numbers.

I call for a deferralment of the decision on the basis that interested people were not given sufficient information, and the regulations that the applications will be judged under are clearly unworkable.

#### Duty to promote equality

All local authorities have a legal obligation under the Public Sector Duty of the Equality Act 2010 to eliminate unlawful gender discrimination and harassment and to promote equality of opportunity between women and men. Article 1 of the Convention on the Elimination of Discrimination Against Women (CEDAW) states that discrimination against women means:

*any distinction, exclusion or restriction made on the basis of sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field.*

A report by End Violence Against Women and London Metropolitan University, *Sexualised Sexism: popular culture, sexualisation and violence against women and girls* states that: “**Since violence against women and girls is defined by the United Nations as cause and consequence of gender inequality, rooted in, and also reproducing, disparities in power, economic resources and respect<sup>1</sup>, sexist, sexualised representations of gender play a part in creating environments where violence becomes possible.**”

Link between SEVs and increased crime

The council's assertion that there is no link between SEVs and crime and disorder is unsubstantiated. There is clear evidence that women working in SEVs are likely to be victims of sexual violence and exploitation. Research has also found a link between lapdancing clubs and prostitution (see Bindel 2004).

<http://secondaryeffectsresearch.com/files/Edinburgh.pdf>

A report by the Lilith Project which looked at lap-dancing in Camden Town found that in the three years before and after the opening of four large lap-dancing clubs in the area, incidents of rape in Camden rose by 50%, while sexual assault rose by 57%. It also concludes that the existence of lap-dancing clubs has a negative effect on the community, that areas where lap-dance clubs operate have become 'no-go' for women who feel uncomfortable walking by, and that men have been harassed by personnel offering them sexual services.

One body of research on strip clubs in the US found that all dancers had suffered verbal harassment and physical and sexual abuse while at work; all had been propositioned for prostitution; and three-quarters had been stalked by men associated with the club.

<https://www.theguardian.com/world/2008/mar/19/gender.uk>

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<b>Address of the premises you wish to support or object to.</b>	39 Prince of Wales Road, NR1 1BG

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## Sugar and Spice

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