

1. Shani Thompson

Dear Ms Davies

I have considered the council's draft statement of policy for the Licensing of Sex Establishments and wish to make a representation regarding the proposal at paragraph 4.3 that "the number of sexual entertainment venues be limited to two". Whilst I do not object to the principle of limiting the number of sexual entertainment venues, I am strongly of the view that a limitation of two is dangerously restrictive and may be counterproductive.

I commend the policy's proposal to ensure that such establishments are not placed in sensitive locations such as residential areas or on the promenade. This appears to be sufficient restriction without imposing an arbitrary further restriction of just two licences.

There are already more than two such premises in the town and I believe that the proposed policy and legislative changes mean that more operators may seek to open now that Sex Establishments are to face better regulation and control.

Restricting Blackpool to two establishments will at its best adversely affect the ability of the night time economy to compete with those towns that can offer a greater degree of choice. At its worse the restriction may result in unlicensed venues seeking to exploit a demand that two establishments seem unlikely to meet.

I would suggest that the council does not restrict the number of Establishments until after the second appointed day (2 November 2011) after which the council will be able to jointly consider all the applications of current and proposed sexual entertainment venues and decide what the appropriate balance is between the potential number of proposed applications and the necessary restriction of the same in line with paragraph 3 of the policy.

I am grateful for the opportunity to record my thoughts within the consultation process and would welcome the chance to speak at or attend any meeting regarding the adoption of the policy so that I can better understand the authority's position
Yours sincerely

Ms S Thomson

2. Kirsty Lunn

After reading the proposed new legislation we are looking forward to working with Blackpool council and licensing team to secure a successful application and also maintain a successful operation of a new sex encounter venue.

I would like to raise a small number of questions concerning the proposed policy.

Firstly Number 3.2 f states a license will not be granted to any venue 'in close proximity to a church or any other place of religious worship' could we please be provided with more details on this as this is quite vague, for example could we have clarification on the term 'close proximity'. Our concern here is the Chapel of Love currently under construction which is to be situated on the promenade.

Could we also have clarification on what constitutes a place of worship? As the Chapel of Love will be performing same sex marriages can we assume this not fall under the definition of place of worship?

Our final concern is the locality of the licensed venues, number 3.2 h states that a license will not be granted to a premise situated on the promenade. Is this a guideline and not a fixed rule? Also will it be in our favor on our application that our entrance is extremely small and that we are situated on the first floor and not the ground floor, so even though our premise is located on the promenade our entrance is decidedly concealed and we have no signage on the promenade.

Another point I would like to raise concerning the promenade is Number 4.3 which states that two licenses will be granted, all venues currently in operation are situated on the promenade excluding one, in response to this will the council be more willing to license venues situated on the promenade if the entrance and signage are discreet, the previous operation history is of a high standard and the premise has received no complaints for the public?

I appreciate any feedback possible on any of the issues i have raised and also any further information which can be provided or clarified regarding the propped sex encounter policy.

Thank you
Kirsty Lunn
Eden

3. Wicked

From wicked dancing staff and management (open feedback policy)
We think it is unfair to target the venues with high fees that are non-refundable without clear guidance in which we have listed a lot of things below.

Also

In Blackpool you have brothels running which don't get charged fees in which the council leader peter Callow (at the time)said to the press we don't mind these brothels as long as they don't get to big in which there are more brothels then lap dancing clubs by numbers now.

Does it make sense to have about 6 brothels up where people pay for sex then say we want to limit the number of lap dancing clubs for the prevention of harm to children which there is no contact rule and the venues all have CCTV coverage and are also paying big bills for security to prevent youth from getting into these venues? On the above grounds and by previous comments by council staff all over the press we do think this is being done on immoral grounds as you are favouring brothels over professional establishments.

Please note below comments

Section 3.1

We think by limiting the number of venues to 2 this could bring trouble in to the Venues.

As these are visited by large groups of men which are the main customers this could place a lot of men in one venue at any time instead of spreading them out between the current 4 venues (prevention of crime and disorder)

How can you discriminate between sex establishments and a nightclub or town centre pub as at the end of the day they all sell alcohol also there is less trouble at the sex establishments then most of the town centre pubs.

Section 3

- 1) What is close proximity? This distance needs to be clearly defined?
- 2) When it states in close proximity to tourist attractions the lights are classed as a tourist attraction so that would put all the current clubs out of the running?
- 3) What's classed as a family shopping area? This needs to be clearly defined
- 4) Situated on the promenade: by switching doors over in other premises you can then enter from behind the venue which means you still on the promenade but work from the other entrance so this needs clarifying as the address of the venues would still be on the promenade and the buildings are still on the promenade. **(loophole)**
- 5) All this needs to be discussed before any venue applies for a licence and clear guidance given to all the current venues on if they will not meet any of the requirements on section 3 before a licence is applied for as otherwise it is a big fee to pay for nothing.

The council should visit each venue to see if they do meet the requirements? Then send a letter out to confirm this before a licence is applied for. Otherwise we think this taking money unlawfully, When a licence is applied for there should be no concerns about close proximity to anything this should have been approved by the council before hand.

Section 4

Due to blackpool being a big stag and hen destination we do think at least 3/4 venues should be allowed to disperse the numbers (prevention of crime and disorder)

Section 5

- 1) As above the council must consult the current clubs and any new clubs on all the issues in section 3 to see if there could be any problems before making an application as this should not be an issue once the licence has been applied for
- 2) For what reason should current operators send in plans of the venue for an application when the venues are already operating as a sex establishments within the blackpool council district and you already have plans of these venues? We can understand a new venue having to send one in but an existing premises should not have to submit these (you could just do an endorsement of current licence)
- 3) The fees should not be non-returnable or if non-returnable then it should be split in to an application fee and a licence fee on approval as per below comments in section 6
- 4) OK it is understandable that if the number of lap dancing clubs was only 2 that better money would be made from these 2 clubs, but to take £5000 from a business in the current market conditions for something that's not guaranteed that they are doing at present and only paying a few hundred pound for is a bit bad

Section 6

- 1) From what we see the fee would be £5,000 A year in which is a lot of money for a 1 day a week business, Friday nights in Blackpool are dead we get about 80

people in our venue where a centre pub may get a few hundred the lap dancing business except Eden (prom and town centre location) is a one day a week business that's Saturdays in season so can £5,000 be justified for a one day a week business for something that we pay £180 for at the current time and bring less trouble than other venues. Sex shops are a 6 day a week business

2) No financial consideration has been given here which could see some owners go bankrupt

3) If a fee is going to be £5,000 this should only be payable on being granted a new licence and a lot lower fee for making an application say £1,000 for application then £4,000 on being granted a licence .

But councils in London are only charging £3,500 like Lambeth.

Manchester are only charging £4,425 which is a 7 day business.

Liverpool £5,000 and £1600 on being granted but only £1600 per year to renew the licence but full nudity is allowed in all these other towns and cities as well.

Loopholes

1) we are licensed for male and female dancers under the new licence laws we would not be breaking any laws by having male dancers on as long as they keep their thong on because they will not be showing their anus or penis as defined in the new regulation

2) If you put nipple tassels on the girls this is not classed as sexual performance so this could be artful dancing

Consideration should be given to loopholes in which are not breaking the law as above which will need discussing