

Ashley Objection

I would like to formally submit my comments on the revision of the SEV policy and stress that I strongly object to the proposal of the reduction of the number of SEV's to zero.

I have worked in this industry for approximately fourteen years, I have worked closely with council and police licensing during this time to make this industry safe and successful.

I would estimate I have worked with over a thousand entertainers over this period of time, girls travelling from all across the country to work in the last remaining town which provides no contact topless only venues for them to work out of. These girls range from single mums working to provide for their families, to career entertainers who have been in the industry longer than myself and used their income to invest in property and start their own business. I have seen girls pay their way through master's degrees and go on to become successful law graduates, Nurses... the list could go on. What I have not seen in this time is any of these girls fear for their safety whilst at work – we have always provided adequate security, operated a buddy system for girls going out for breaks, provided security walk outs to cars or cabs at the end of shifts.

I have grave concerns that these proposed changes will change the nature of the industry and take away this safe working environment we have built over the years. If the council goes ahead with the proposed reduction to Zero and the worst happens and all Blackpool SEVs are closed these girls will no longer have these safe and regulated operating environments, the industry will be forced underground and girls will be tempted, if not forced to work in places such as hotels for private bachelor parties where their risk of sexual assault and financial exploitation would be alarmingly high.

Blackpool Councils own Leader Cllr Lynn Williams has recently endorsed the 'It stops here' movement to create a safer environment for women this proposed amendment would be in complete juxtaposition with this endorsements, she declared plans to work with 'women, police, health, businesses and our vibrant community groups to create not just safe spaces, but a Blackpool that is intolerant of abuse...' SEV's are safe spaces for female entertainers and the threat to take these away puts a large number of women in a potentially dangerous position.

Along with my concerns for the entertainers I also object on behalf of myself and every member of staff who has worked for me at Eden. This is my business and with it I contribute to Blackpool's economy and employments rates, I feel that a reduction to zero would almost act as a target to achieve – Close all Blackpool SEV's. This would put my business under unfair scrutiny, create extreme anxiety and potential financial hardship for myself and my family as well as for each employee working for me, it would feel like we are operating with a ticking bomb strapped to our business.

The council is proposing the number of Sex cinemas be cut in half and I feel this is a fair decision which should also be applied to SEV's.

I hope the council will take onboard my concerns and re-evaluate the proposed amendments.

John Objection

I would like to formally submit my comments on the revision of the SEV policy and stress that I strongly object to the proposal of the reduction of the number of SEV's to 0, even with the retention of grandfather rights.

My father, myself and my wife have been owner/operators of either one or two establishments in Blackpool for the past fourteen years. We currently hold one SEV for the premises of Eden on the promenade. Although my wife, Ashley Sayers is the license holder and operator this is the main contributor to our family's income.

Under the proposed revision allowing for grandfather rights only with no option to transfer a license or renew in the event of its expiration my family is left in an extremely vulnerable position. A number of scenarios are of dire concern to me, if anything was to happen to my wife's health which would cause her to be unable to continue to operate the venue, or in the event of her death myself and my family would also be subjected to the loss of our business and main income. In the unlikely event of divorce, I would also be unable to negotiate the retention of the business.

I have seen the town reduce the number of SEV in the past and understand the reasoning for the initial introduction of the limit to four, I however cannot understand the proposal to now reduce this from four to zero. I would counter propose the reduction be set to two, with a clause that these are held by different operators to allow for business practices and also retain the right/option to transfer a SEV licence into another person's name.

I hope the council will take onboard my concerns and re-evaluate the proposed amendments.

From: [Licensing la2003](#)
To: [Sharon Davies](#)
Subject: FW: Response to Blackpool Council's Proposed 2021 SEV Policy
Date: 01 April 2021 08:36:01

Morning Sharon

Please find attached comments on the SEV review from Bar Heaven which I understand you are dealing with.

Many Thanks

Judith

Judith Brooks-Brennan

Licensing Officer

Licensing Services

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From: Bar Heaven
Sent: 31 March 2021 21:51
To: Licensing la2003
Cc: Lee Petrak; Dave Verity; Ryan Ratcliffe
Subject: Response to Blackpool Council's Proposed 2021 SEV Policy

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Dear Sir/Madam,

Thank you for your invite to comment on Blackpoll Council's proposed 2021 SEV Policy, please find below my comments and observations in general and on the revised policy (on Behalf of Heaven & Sinless Gentlemen's Clubs)

- Having watched the recent council licensing review meeting I am somewhat shocked at the clear moral grounds based witch hunt of SEV'S by certain councillors, which rather ironically is in contradiction to the councils own policy of not placing any weight behind an application or renewal of licence if the objection is based on moral grounds.
- I feel that rather than target the licenced and co-operative SEV operators such as ourselves, attention should be given to:
 - Sauna operators who the majority of the public and myself believe operate well outside their licence terms.

- Non SEV licensed Venue's, who do not have to, and in most instances do not, provide security or CCTV for the protection of the public or Dancers, do not have to adhere to any of the SEV policy therefore can provide full nude dances and despite legislation are not easily monitored to ensure only 12 such performances take place a year.
 - A local pub or hotel would not have to pay the £3800 per annum fee but could offer full nude dancing with no safety to the public or dancers every weekend and unfortunately Blackpool licensing would not be able to monitor or control it
 - In fact rather than our venues working with the licensing departments we could find 4 co-operative public houses and rotate round such venues on a monthly basis, while not having to employ security, pay SEV fees or incur a multitude of other costs involved in running a SEV.
 - It is not our intention to engage in such a practice but feel attention should be given to these issues to ensure no dancer is ever put in possible danger.
- I am part of the management team of more than one of Blackpool's SEV'S , namely Sinless & Heaven, and wish to make the following clear
 - All Dancers working at the above venues know that if they have any concerns at either work or home there is a 'House Mum', Management & Security who are always available to talk to both inside and outside work. As a management team we spend a lot of time with the girls ensuring they have no worries at home or work and are able to approach us at any time.
 - We ensure all the dancers work of their own free will.
 - Our venues have not to my knowledge had the need to call for external assistance (Police, Ambulance etc) and in fact probably have less crime related problems than that of any Blackpool alcohol licensed establishment.
 - We have regular unannounced visits from both Blackpool Police & council licensing team and to date they have not had any problems, and hope both teams can confirm this and that we welcome them with open arms and assist in all ways possible.
 - It should also be noted that Blackpool's SEV's have a topless only policy unlike the majority of the rest of the U.K.'s SEV'S. With Venue's as close as Preston, Stockport, Stoke-on -Trent & Manchester—allowing full nude. (Please note we are not requesting/suggesting full nude just highlighting how we working with the Council to provide amenities that some sectors of the visitors to Blackpool enjoy. But not to provide a 'smutty or sordid' experience as intimated during the Council meeting

With regard to the proposed changes we have no objections and have added our comments below;

- SECTION 3.3
 - In regard to the proposed changes, which include grandfather rights we have no objection as we believe that if a licence is revoked by the council then we are sure it is for good reason and would only be in protection of the Town, the Dancers or the public.

- SECTION 14 thru 18
 - We have no objections to the additions of these items to the policy, we believe these were historically added to another SEV licences terms due to previous incident's, and at the time advised Blackpool Councils licensing team that we would adopt them voluntarily and did so, despite them not being a requirement of our particular venue's. We do feel, however, that a change made to one SEV should prompt amendments to all, thus avoiding any allegations of either favouritism or victimisation

- SECTION 47
 - We have no objections to the 21 day retention of CCTV recordings and currently store recordings for well in excess of this time, such recordings are always available for authorised officers of the SEV listed bodies. I would just like to emphasise that such recordings are either password protected or stored in a safe, and are only ever viewed by senior management for dispute resolution

Steve Smith
Manager – Sinless & Heaven Lap-dancing Blackpool

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From: [Sharon Davies](#)
To: [Sharon Davies](#)
Subject: FW: Comments in relation to 2021 SEV Consultation (DAV645/1)
Date: 31 August 2021 16:48:01

From: Naomi Shaw
Sent: 30 March 2021 15:09
To: Licensing la2003
Cc: Rebecca Ingram
Subject: Comments in relation to 2021 SEV Consultation (DAV645/1)

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Dear Sirs,

We are emailing in relation to the ongoing consultation taking place in relation to Sexual Entertainment Venues in Blackpool. We act on behalf of the owner of the building in which Eden 1 is located. Eden 1 holds a current SEV licence, with a tenant in place who intends to trade utilising that licence – as has long been the case.

In general terms, we would strongly resist the proposal to cap the number of SEV's to 0. It is our view that all licensing applications should be considered on their own merits, and that arbitrary limits and caps are unhelpful. If any particular SEV application is considered to be inappropriate, you have the power under the existing legislation and your existing policy to refuse that application. However, we can see no reason why legitimate business operators who run responsible businesses in appropriate locations should be entirely barred from Blackpool. SEVs are heavily regulated as it is, and statistically cause very little harm to the areas in which they are located – often even falling entirely under the radar except to those who chose to visit.

However, should you determine that a cap is appropriate in Blackpool, we are pleased to note that there is a proposal in place to give existing SEV's grandfather rights despite the cap of 0. On behalf of our client we would highlight that it is absolutely essential that this provision remain in the final version of the new policy to avoid punishing legitimate and already existing business who set up in good faith under your previous policy.

Should you require any further information in relation to this consultation response, please do not hesitate to contact me.

Kind regards

Naomi Shaw
For and on behalf of Kuit Steinart Levy LLP

Naomi Shaw

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