

## Appendix D

### Objection A

#### Objection to Pussycat strip club, Brighton and Hove 2024



REDACTED

We object to the granting of this license on the grounds outlined below:

#### Objection on the grounds of unfit Applicant

Granting this license breaches section 2.2 a) and b) of the council's own SEV policy, by virtue of the fact that the applicant is the son of a convicted sex offender and this sex offender co-owns the premises:

*2.2 A licence will **not** normally be granted or renewed in the following circumstances.*

- (a) that the applicant is unsuitable to hold the licence by reason of having been convicted of an offence or for **any other reason.***
- (b) that if the licence were to be granted or renewed the business to which it relates would be managed by or carried on **for the benefit of a person** other than the applicant, **who would be refused the grant or renewal of such a licence if he made the application himself.***

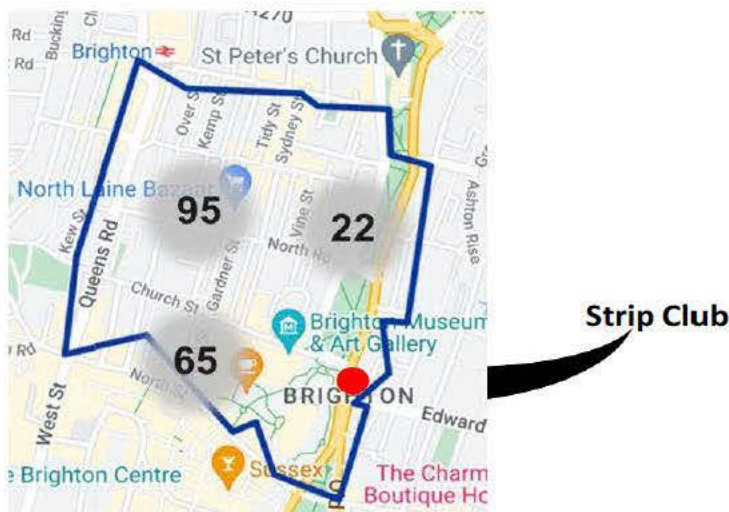
- [Strip club owned by convicted sex offender \(sex buying off a child\)](#)
- [Club owner 'not breaching conditions' when photographed naked in club with lap dancers](#)
- [Student exposes Brighton strip industry](#)

## Objection on the grounds of Inappropriate Locality

### Club Location:



### Map of Crime Hotspots:



Granting this license breaches the council's SEV policy according to its location criteria. The club is in central Brighton – a residential area with high footfall which also serves as a main shopping area. It is practically on University campus, very close to a primary school and churches and in an area of consistent and historical high crime:

4.0 The following policy will apply to all applications for SEVs and will only be overridden in exceptional circumstances.

4.1 Licences for SEVs will not be granted within family residential areas, family leisure areas or retail areas where commercial occupiers argue plausibly that SEVs would lower the retail attraction of the area.

- *Main shopping streets*
- *Areas with strong faith communities*
- *Educational areas*
- *Areas earmarked for regeneration*
- *Areas where VisitBrighton and tourism members and officers advise there should be no SEVs*
- *Areas with history of social difficulties*
- *Areas with high levels of recorded crime*
- *a care home which houses vulnerable young people.*

The policy explicitly states an SEV will not be licensed ‘within sightline’ of colleges, public buildings and community facilities – yet it is on the doorstep of Brighton University, Brighton Language college and a library. It is also within sight of public buildings such as The Royal Pavilion, Brighton Museum, the Law Courts, Police Station and Probation service:

*4.2 Licences for SEVs will **not be granted** within sightlines of:*

- *Schools, youth facilities and colleges*
- *Public buildings and community facilities*

The policy states SEV licenses will only be granted in the locations outlined in 4.1 and 4.2 ‘in exceptional circumstances’. **The council needs to justify what these ‘exceptional circumstances’** might be (presumably it is not the fact that it is owned by a convicted sex offender and operated by his son).

### **Objection on the grounds of unlawful SEV Policy**

We further question the legality of the SEV policy, under which the decision to license this SEV is made. How is it justified that 3 clubs are appropriate in the Brighton Leisure Centre locality? Was it ‘written around’ pre-existing clubs (which would be unlawful)? What equality impact assessment, if any, was carried out?

*4.3 Except in exceptional circumstances, a new licence for a SEV will not be granted in the relevant locality if at the time the application is made the number of SEVs in the relevant locality is equal to or exceeds the number which the authority considers appropriate for the relevant locality, as follows:*

- *Brighton Leisure Centre*                      3
- *Hove Commercial Centre*                Nil
- *All other areas within the City*        Nil

We would like to ensure the council is aware that [no council has ever been successfully legally challenged](#) for refusing to license/relicense a strip club (if the decision was made appropriately). The entire purpose of SEV legislation was to make it easy, giving sweeping powers to councils, to refuse to license/relicense SEVs. Why is this concept not being applied by this council?

### **Objection on the grounds of Breach of Equality Law**

We would also challenge the legality of licensing this (or any other SEV alongside your SEV policy) under [equality law](#). There have been 3 successful High Court challenges, to our knowledge, against councils for breaching equality law in their pro-strip industry stance. It is beyond doubt that your council is also in breach of such legislation.

We urge the council to review the following documents to help ensure you make a legally fit decision that is best for local residents, particularly women and girls, as well as wider society:

- [Strip Clubs – large body of evidence demonstrating the multiple harms of the industry](#)
- [Strip Clubs and the Law](#)
- [Strip Clubs & EIAs – Strip Clubs are Incompatible with Equality Law](#)
- [Strip Clubs – Incidences UK-wide](#)

## Objection B

**From:** REDACTED

**Sent:** Wednesday, July 17, 2024 11:08 AM

**To:** EHL Licensing <[EHL.Licensing@brighton-hove.gov.uk](mailto:EHL.Licensing@brighton-hove.gov.uk)>

**Cc:** REDACTED REDACTED

**Subject:** LICENCING PANEL- OBJECTION TO LICENCE RENEWAL FOR PUSSYCAT CLUB BRIGHTON

To Brighton & Hove licensing panel,

FAO

REDACTED

REDACTED

REDACTED

REDACTED

REDACTED

REDACTED

Content warning- explicit images

### Who we are

**REDACTED**, is a vibrant & diverse womens' group. We bring together women who live, work or study in Brighton & Hove and surrounding areas for the purposes of:

- Mutual support and friendship
- Information sharing and analysis of women's diverse experiences
- Discussion of feminist ideas
- Organisation of events and activities for women

We hold monthly spaces where women talk about the issues that impact their lives. We co-ordinate campaigns on the basis of their priorities with the aim to improve the lives of women and girls in Brighton & Hove. We have no religious or political affiliation. We were shortlisted for

the prestigious **REDACTED** Award. We were recently funded by BHCC until the community fund was discontinued following budget cuts.

**We are objecting to the application to renew the SEV licence for The Pussy Cat Club.**

Our primary reason is because the women who contact us and attend our events frequently tell us that this is a priority for them. That sexual entertainment venues are outdated, encourage the objectification of all women, make our public spaces more hostile and unsafe for the women and girls of our city, are a barrier to women's equality and are out of step with a community that values women and girls. It is part of **REDACTED** aims that we amplify and support the views of women in our city. That we ensure their voices are heard and the impact on them, as members of our community are considered. It is in that spirit that we place this objection.

Our objections fall under three broad categories

1. Numerous breaches of the council's own Sex Establishment Policy 2010.
2. Issues in relation to the Equality Act 2010 and promoting the equality of women and girls.
3. Viewing this application through the lens of reducing harm, specifically reducing violence against women and girls in a city with higher than average rates of domestic violence and sexual assault.

1. **Breaches of Brighton and Hove City Council's [Sex Establishment Policy 2010](#).**

**(i) Section 2. The club's building is owned by a convicted sex offender, Kenneth McGrath.** He was convicted of '*paying for the sexual services of a child*'.

<https://www.theargus.co.uk/news/18174212.pussycat-club-brighton-warned-sex-offender-pictured-naked/>

Although McGrath is not allowed in the club during licensable hours, only last year photographs emerged of him in the club with naked dancers. Although it could not be proved that this was during licensable hours, we do not think that it is realistic that a convicted sex offender should be trusted to respect this rule or be honest in this situation. This places staff in direct danger.

When McGrath was jailed, an NSPCC spokesperson said:



*“McGrath has been shown to be a manipulative and calculating individual who exploited a vulnerable child for his own sexual gratification.”*

It is concerning that BHCC, when faced with inconclusive evidence, chose to take the word of a convicted sex offender, who held a position of power over those he was photographed with. BHCC said:

*“The evidence we have received to date is inconclusive and does not prove Kenneth McGrath was at the club when it was operating publicly and licensable activities were taking place.”*

This is not only out of step with, but completely antithetical to the Council’s ambitions to get White Ribbon accreditation.

Moreover, as the owner of the building, McGrath the sex offender will be directly benefiting from the SEV licence. In light of his offending & the NSPCC comment on his case we do not feel confident that removing himself as a Director at companies house means that he is not benefiting directly from this SEV.

**(ii) Section 2.** The SEV, and building premises is registered at Companies House with a family member of Kenneth McGrath, a convicted sex offender.

**(iii) Section 3.** The club is in an area of high crime, Pavilion Gardens is recorded as sexual-offences “hot-spot”. It is directly next door to the Pussy Cat Club, in direct line of sight of the SEV.

Crime in the locality includes a string of reported rapes not limited to but including the following:

[April 2024](#)

[Feb 2023 Gang rape](#)

[June 2019](#)

We would like licensing to consider that the majority of rapes and sexual assaults, incidents of flashing do not get reported. We do not think that incidents of sexual harassment, assault and rape are limited to these three incidents.

The council is considering taking extreme steps such as [building a 7ft fence](#) around the historic gardens and restricting the valuable community space to tackle this crime, it is time they

considered closing this SEV that is within sightline of the location of so many sexual assaults and rapes.

**(iv) B&H SEV Policy 3.1b** must not be in an area of historic importance. It is adjacent to and within metres of Brighton Pavillion, The Dome & Pavilion Gardens (Grade 2 listed gardens). All listed buildings of national importance. Other things of historical importance include the Queen Victoria statue, Prince Regent Statue, The India Gate Memorial.

**(v) B&H SEV Policy 4.1** Licences for SEVs will not be granted within family residential areas. There has been considerable development of residential properties in that area reaching north to Morley St and east to Blaker St. Although we are unclear what defines a 'family residential area', in Brighton there are many families esp single-parent families living in smaller units in central Brighton.

**(vi) B&H SEV Policy 4.1** Licences for SEVs will not be granted within family leisure areas. There is no doubt that the green space of Victoria Gardens, the Victoria Gardens fountain (recently refurbished), the Pavillion, Pavilion Gardens, The Brighton Dome, The North Laines shopping district are family leisure areas. The Pavillion just won a [trip advisor award](#), attracts over 160k visitors annually, many of them families and many of them school trips.

BHCC's own website lists Victoria Gardens as an important municipal space.

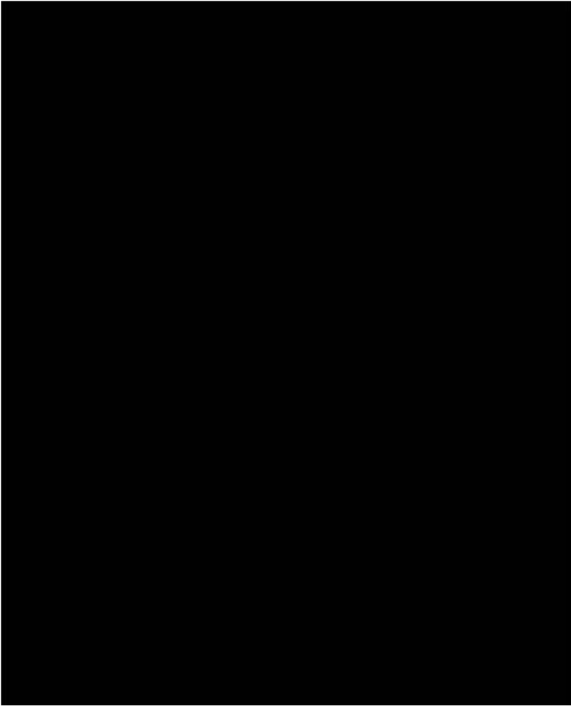
**(vii) B&H SEV Policy 4.1** Licences for SEVs will not be granted in educational areas. The Brighton & Hove Museum and Art Gallery is an educational area, in close proximity. Brighton and Hove have a large home ed community and the Museum and Art Gallery is a fantastic resource and hub for child learning in our city.

**(viii) B&H SEV Policy 4.1** Licences for SEVs will not be granted in areas marked for regeneration. Valley gardens has been recently regenerated which raises questions if the previous licence application was scrutinised adequately. Valley gardens has been an expensive and successful regeneration which has dramatically changed the nature of the area (see section 4.4).. The Pussy Cat Club is not well kept, looks seedy and unsafe from the exterior and detracts significantly from the regeneration. We have been told that women, especially women with children do not feel safe in the vicinity and cross the road to avoid using the pavement outside of the club. This is diametrically opposed to the aims of the area's regeneration.

#### **(ix) Breaks prescribed conditions 6-9**

There are [REDACTED] referring to 'full service' which is a well known term amongst men who 'buy sex' as sexual intercourse. This is unchallenged by the SEV and would be read by other sex-buyers as being able to 'buy sex'. It is our position as feminists and as women in Brighton, that sexual consent can not be purchased. The widely accepted definition of sexual consent is FRIES: Freely given, Reversible, Informed, Enthusiastic and Specific. It is reasonable that our Council should also hold this position and at a minimum hold up its own SEV policies.





**(x) Breaks prescribed conditions 10, 15, 16, 17 & 18**

Content warning

The following links/pictures are only some of the public facing material which breaks the SEV policy- they include sexual contact between dancers, dancers' personal contact details, breaks ASA regulations re nudity, and includes images on the SEV social media of women in bedrooms.

We will add to this that we believe the BHCC SEV Policy is inadequate as does not address social media activity or acknowledge that this is frequently a medium for purchasing sex, with a high probability that this leads directly to the exploitation of trafficked women. We are uncomfortable giving links to the following, but feel it is important to do so in relation to this objection. There are many more examples. We do not seek to shame or out the women who we have included, but this is all public facing content.



REDACTED PHOTO  
REDACTED PHOTO

## 2. Equality Act 2010- [Public Sector Equality Duty](#)

(i) The PSED states councils must ‘take due regard’ to:

**“Seek to eliminate harassment, victimisation and discrimination’ of women/girls, advance equal opportunities between people who have a protected characteristic and those who do not, foster good relations between people who have a protected characteristic and those who do not.”**

The PSD applies to

- Women working in strip clubs
- Women in the vicinity of strip clubs
- Women and girls in wider society (wider social attitudes)
- Councils must consider equality law even in wider society
- Councils cannot dismiss harm-based concerns as ‘moralistic’

**(ii) Many women feel, and often are, unsafe in the vicinity of strip clubs** – even to the point of not using the surrounding area – a self-imposed ‘curfew’. This is anti-equalities and cannot be prevented. There is a lot of research which confirms that in areas where there are SEVs, women and girls feel and are less safe.

[www.researchgate.net/publication/345352947\\_Exploring\\_the\\_relationship\\_between\\_strip\\_clubs\\_and\\_rates\\_of\\_sexual\\_violence\\_and\\_violent\\_crime](http://www.researchgate.net/publication/345352947_Exploring_the_relationship_between_strip_clubs_and_rates_of_sexual_violence_and_violent_crime)

**(iii) A new report** has been released to highlight the harm caused by Sexual Entertainment Venues (SEVs) to women as a group

The [50 page report](#) was produced by Safe and Equal Bristol – an umbrella group of Bristol-based stakeholders and professionals in the field of gender equality and sexual and gender-based violence – who want Bristol to be a fair and equal city that does not tolerate violence against women and girls.

**(iv) Their recruitment material is exploitative** and even explicitly states they are looking for single-mums, an acknowledgement that many working are doing so as they are in financially vulnerable situations. This advert also fails to comply to the Equality Act.

**Dancers Wanted**

**Exclusive Private Gentlemen's Club**

Perfect for students and single mums

Big earnings

Weekends Only

Flexible Rota

Experience not required

pclub2020 • Follow  
Original audio

pclub2020 Dancers Wanted!!

Perfect for students and single mums.

#lapdancingjobs #brightonstrippers #brightonstripclub  
#waitress #barwork #greatearningpotential  
#pussycatclubbrighton #lapdancingclubs #students  
#parttimejob #weekendwork

Edited · 100 w

12 likes  
15 August 2022

Add a comment...

### 3. Reducing violence against women and girls

(i) Brighton Council is seeking White Ribbon accreditation.

<https://democracy.brighton-hove.gov.uk/documents/s171409/White%20Ribbon%20UK%20Accreditation.pdf>

To achieve this our council needs to:

#### **Appendix 1.2**

***'Changing Culture: work towards a zero-tolerance policy on Sexual Entertainment Venues'***

***Creating a safe working space for female employees and the people we deliver services to (SEVs are not safe work places)***

***Influencing colleagues and partners to consider how violence against women and girls impacts inequality in the workplace***

***Drive social change to strengthen gender equality and stop violence against women Improve organisational culture, safety, and morale Increase staff knowledge and skills to address violence against women***

Therefore approving this licence is in direct contradiction with our council's stated objective to obtain White Ribbon Status.

These aims are directly undermined by licensing nude-dancing SEVs. There is no shortage of testimonies, especially post #MeToo of women selling sex that their periods working in such venues included sexual assault, harassment, stalking, economic exploitation, physical violence, verbal abuse and so forth.

SEVs are only one face of the sex industry in Brighton, which is linked with human trafficking, modern day slavery, rape/forced prostitution. The UN states that sex trafficking is one of the fastest growing crimes.

<https://www.brightonandhovenews.org/2023/10/16/sex-trafficker-jailed-after-arrest-in-brighton/>

(ii) Brighton and Hove have higher rates of sexual violence and domestic violence than the national average. In this context we ask Brighton and Hove Council to consider that our whole city is viewed as a crime hot-spot in relation to violence against women and girls. Sussex Police VAWG strategy 3.1 states “Sussex Police recognises its pivotal role in preventing harm and sees the tackling of ‘Violence Against Women and Girls’ (VAWG) offences as an absolute priority”. In the absence of Brighton and Hove’s VAWG strategy we ask licencing to support them in this objective.

(iii) It is well documented than men who pay for sex/sexual entertainment, who use pornography are more likely to believe rape myths, more likely to commit sexual assault and more likely to hold misogynistic attitudes towards women. It is time Brighton modernised and prioritise the safety of women and girls.

We would welcome the opportunity to provide more information and supporting evidence. We are unaware if the police are raising objections to the licence renewal, but we would like to point out that many survivors in Brighton have lost faith in Sussex Police’s ability to protect women from exploitation and assault. For example they are currently referred to the IPCC for failing to record crimes, including crimes relating to violence against women and girls.

<https://www.bbc.co.uk/news/uk-england-sussex-65254754>

B&H prides itself on being a city that stands against all forms of violence and abuse against women and girls. It would be good to see the Licensing Committee joining the dots and enabling women and girls in the city to believe that the Council takes their safety and well being seriously.

In appreciation of your time,

**REDACTED, REDACTED, REDACTED, REDACTED, REDACTED, REDACTED, REDACTED, REDACTED.**

On behalf of women across Brighton who attend **REDACTED**

**REDACTED**

**REDACTED**

**REDACTED**

**REDACTED**

**REDACTED**

*A spokeswoman said: "Sussex Police are failing to protect women and failing to send a clear message to men that sexual crimes will not be tolerated in Brighton.*

*"Naming men who have been charged is a basic step in facilitating other potential victims to come forward, helps secure convictions of violent offenders and demonstrates to perpetrators that they will not be sheltered by Sussex Police."*

#### **Appendix D - Sixteen Brief Objections Emails – (A) to (P)**

##### **(A)**

I object to the re'licensing of this strip club on the following grounds.

This **breaches council policy** on numerous counts:

- Section 2 of policy – Unfit Owner : **Owned by convicted sex offender**
- (who the Council deemed did not breach conditions when later **photographed naked with lap dancers at the club**)
- Section 2 – Unfit Applicant: Club run by sex offender's son
- Section 4 – In a totally 'unfit' location (practically on university campus, near schools and churches, in a main shopping and residential area, by places of historical interest *and* in an area of **high crime**).

Thank you

##### **(B)**

I cannot believe that in these troubled times a council is considering re licensing this premises. It is beyond insulting to every woman and child that this is contributing to the culture of the area. A few female jobs lost if it's not relicensed but peace of mind and an acknowledgement that this is unacceptable in 2024 for so many more.

Owned by an sex offender and run by his son says it all. Please do not relicense these premises.

Thank you

**(C)**

Dear Brighton licencing committee,

I work as a doctor with victims of trafficking for "sex work". I see the terrible impact of women working in places that objectify them as objects.

I am writing to strongly object to the licensing of "Pussycat SEV" on the following grounds;

The application [breaches council policy](#) on numerous counts:

- Section 2 of policy – Unfit Owner : [Owned by convicted sex offender](#)
- (who the Council deemed did not breach conditions when later [photographed naked with lap dancers at the club](#))
- Section 2 – Unfit Applicant: Club run by sex offender's son
- Section 4 – In a totally 'unfit' location (practically on university campus, near schools and churches, in a main shopping and residential area, by places of historical interest *and* in an area of [high crime](#)).

I urge you to reject this application.

Yours sincerely,

**(D)**

Stop licensing a SEX OFFENDER'S strip joint, the Pussycat Club.

This [breaches council policy](#) on numerous counts:

- Section 2 of policy – Unfit Owner : [Owned by convicted sex offender](#)
- (who the Council deemed did not breach conditions when later [photographed naked with lap dancers at the club](#))
- Section 2 – Unfit Applicant: Club run by sex offender's son
- Section 4 – In a totally 'unfit' location (practically on university campus, near schools and churches, in a main shopping and residential area, by places of historical interest *and* in an area of [high crime](#)).

But mainly, at a time when there is a male epidemic of violence against women it sends messages to young women and girls in the community, that they are objects to be bought, consumed and commodified. Women's bodies are not for sale.

Best wishes,



**(E)**

Hi there

I visit Brighton regularly with my two young sons. It's a wonderful place, and so I find it beyond heartbreaking that you are considering relicensing this venue owned by a convicted sex offender, in such a busy built up area, especially in the post metoo era when people have surely had their eyes opened to the horrors of the sex trade.

I'm not a prude, but the left, ( and I consider myself leftwing), have got this so wrong. When a woman is nude she is vulnerable and especially vulnerable on her own with a man who has been drinking. Yes she may have applied for the job, but no matter how liberal you are, what young girl aspires to grow up to take her clothes off and be leered at by men? You need to be pretty desperate or naive. Something has gone wrong somewhere along the line.

Would you be comfortable with your daughter/sister/mum doing this job? And if not, why is it then okay for a certain section of society? Would message does it give out to the young men of Brighton? Stripping can be a slippery slope into the painful world of prostitution, a total loss of self-respect.

I really hope you can help your town move forward. Rather than following in the footsteps of Holbeck in Leeds, and trying to managing something that is vile at the core.

Thanks for reading

**(F)**

Please decline the licensing and keep women and children safe

**(G)**

Dear licensing team

I wish to request that this application is refused:

The area is utterly unsuitable, being close to schools, places of worship, etc.

The owner - a convicted sex offender - is an unfit owner.

Regards,

**(H)**

Please do not re-license the Pussy Cat Strip Joint. I am moving to Brighton from Swansea, a city where the council has decided that for the sake of the community and especially women there are no licenses given to strip clubs. The city is a hub for nightlife and a renowned party destination which is not blighted by this kind of trade.

I am dismayed that I will be moving to an area which does not regard the right of women to not have to live near such places. I lived in East London near such a club and suffered harassment every time I had to walk in the vicinity at night.

Kind Regards

**(I)**

This is so wrong. I have friends who live near there and would not want this on their doorstep.

**(J)**

We do not want or need a strip club in Brighton.

What an example to set to our younger population the women are there to be ogled at as sexual objects. Women often forced into work like this as there isn't other ways of getting money for them. How are we teaching respect?

Club run by the son of a sex offender speaks volumes about the type of person he must be. Would he put his wife or daughter there, I guess not.

Women are fighting for equality in all aspects of our lives and to see yet another strip club trying to open is sending out the wrong message about women.

**(K)**

I object to these premises being granted a license.

**(L)**

Dear Sir/Madam,

As a former resident of Brighton, Kemptown and Hove I urge you to end the licensing of strip clubs.

While women 'consent' to work in these venues they do in a situation of constraint namely a lack of alternative sources of income. There is a strong documented correlation between strip joints and sexual harassment/violence against workers, sex trafficking, organised crime, and sexual harassment of female residents in the surrounding area.

Yours faithfully,

**(M)**

I object strongly to re-licensing of the above Strip Joint.

This [breaches council policy](#) on numerous counts:

- Section 2 of policy – Unfit Owner : [Owned by convicted sex offender](#)
- (who the Council deemed did not breach conditions when later [photographed naked with lap dancers at the club](#))
- Section 2 – Unfit Applicant: Club run by sex offender's son
- Section 4 – In a totally 'unfit' location (practically on university campus, near schools and churches, in a main shopping and residential area, by places of historical interest *and* in an area of [high crime](#)).

Yours faithfully

**(N)**

I object strongly to re-licensing of the above Strip Joint.

This breaches council policy on numerous counts:

Section 2 of policy – Unfit Owner : Owned by convicted sex offender

(who the Council deemed did not breach conditions when later photographed naked with lap dancers at the club)

Section 2 – Unfit Applicant: Club run by sex offender's son

Section 4 – In a totally 'unfit' location (practically on university campus, near schools and churches, in a main shopping and residential area, by places of historical interest and in an area of high crime).

Yours faithfully

**(O)**

Dear Council,

Please do not renew the license for Pussycat Strip Joint. It's not fair for the women who are stripping or the public nearby.

**(P)**

Categorically unsuitable for Brighton and places Council in breach of its Equality duty towards women and the fostering of equality and respect between the sexes.

PLEASE SEE WEALTH OF EVIDENCE OF HARM OF STRIP CLUBS AND SIMILAR INCLUDING INCREASED LIKELIHOOD OF SEXUAL VIOLENCE AGAINST WOMEN, THE REDUCTION OF WHICH I ASSUME IS A PRIORITY FOR THE COUNCIL IN ALL ITS ENDEAVOURS.

