

FYEO 134 – 136 OLD CHRISTCHURCH ROAD BOURNEMOUTH**OBJECTIONS RECEIVED**

Objector #	Relating to Transfer or Renewal	Objection
1a	Renewal	<p>"I object to the licensing of FYEO club as a sex establishment. The reasons are as follows.</p> <p>The applicant is unsuitable to be licensed because during the last year two incidents have occurred which suggest that there has been a breach of licensing conditions not to tout. These have already been reported to the licensing department and consist of a job advertisement for someone to incentivise door staff in the area to recommend the club and the promotion of the club by giving out wristbands allowing free entry at an event advertised as sponsored by FYEO and at which children ie under 18s were allowed to be present.</p> <p>The neighbourhood and the nature of the buildings near to the club's location make the location unsuitable for a sex establishment. The committee should refer to the Bournemouth licensing policy on sex establishment for guidance on what is reasonably considered a suitable location. I do not have access to this policy and cannot remember it completely. I would like to see the policy as a relevant document. In the ordinary course of things the quashing of the BCP sex establishment licensing policy would mean that the Bournemouth policy automatically sprang back into existence, as a quashing order restores the situation before the act quashed, in this case the adoption of BCP's sex establishment policy. In fact the BCP policy specifically included that it replaced the Bournemouth policy. At a previous hearing on this point a legal officer said publicly that legal advice had been received that the Bournemouth policy did not exist, yet no legal authority was given for this. This is against the rules of natural justice which apply to licensing hearings as it means that the case against someone hasn't been given. If it is still BCP council's position that the Bournemouth policy has not sprung up again into existence, could the legal authority for saying that please be provided. The location of FYEO is near a large number of residential premises, including the Citrus Building which houses BCP's own long leaseholders opposite. Encouraging more residential provision in town centres means this is likely to continue. Recently even ground floor former commercial premises at the top end of Old Christchurch Road have been converted to residential premises. I would suggest the committee considers its climate change commitments in deciding on</p>

		<p>the need to encourage people to live in the town centre to reduce the need for commuting.</p> <p>The High Court has, in quashing BCP's sex establishment licensing policy, drawn attention to the legal requirement for the licensing of strip clubs to consider the wider impact on women of licensing adequately. As previously stated to the committee my own experience of working and socialising in the Old Christchurch Road area has included being urged to move away from the entrance to FYEO and not to walk past another strip club, for my own safety. I also draw attention to the Public Sector Equality Duty binding on BCP councillors to encourage good relations between the sexes. I am aware of research into the affect on women of their partners consumption of pornography as negative, and have heard strip clubs described as living pornography. In a previous hearing regarding FYEO documents showing how the club was run included forbidding performers from attending late night bars after shift in case there were still customers in the area and stating that away from the security of the club they couldn't be kept safe. FYEO is a very well established club with experienced staff so that this should be given heavy weight it believed by the committee, and taken into account in seeing that if the performers are at risk from some of the customers, then other women in the area could be as well.</p> <p>At time of writing I await sight of the application, current license and Bournemouth sex establishment licensing policy or legal authority for saying that it does not exist.</p> <p>I do not accept that the reason for it being said not to exist is legally privileged as advice from a legal advisor, as this could cover any advice given and brief to the advisor, but the actual law relied on must be disclosed or the hearing will be in breach of natural justice. This concludes my objection."</p> <p>I consent to my name and email being given to the applicant or its legal advisor and would like to waive my right to anonymity.</p> <p>Kind regards Susan Stockwell</p>
1b	Further info	<p>Re FYEO currently open licensing application, I would like to include the above an any expansion of my objection if allowed to address the committee.</p> <p>It strikes me that Bournemouth town centre is hugely over supplied with strip clubs, given the information I have already given on promotion of FYEO by apparent sponsorship of an event open to children (over 16) and an advert still showing on social media to recruit a staff member to incentivize doormen to recommend that club.</p> <p>This is attached having been downloaded, again, today, as the file name indicates. This comes on top of a third party giving me images of promotional items said to be distributed by Wiggle in Bournemouth, but denied by Wiggle.</p>

		<p>This is relevant if the committee accepts that the Bournemouth sex establishment policy is current as, from memory, though I don't have a copy to refer to, it capped strip clubs to 3 in this area.</p> <p>Given changes in the neighbourhood since the policy was adopted and these apparent instances of promotional activity it is clear that 3 is no longer an appropriate cap and so the committee can refuse to license on the basis of too many strip clubs.</p> <p>{NOTE: There is no current SEV Policy for BCP Council}</p>
1c	Further info	<p>I note that it is now past the date for making an objection. However, I understand that you have discretion to allow a point to be made late if being late doesn't prejudice the applicant. As it is still over a month to the hearing, I assume this is the case, ie that they wouldn't be prejudiced.</p> <p>I would like to include the point that the premises are unsuitable for licensing for use as a sexual entertainment venue because the owner of the landlord still appears to be someone with a conviction for an offence of dishonesty.</p> <p>It may be that the information I have is out of date and that Hampshire Restaurants Ltd no longer holds the lease on this property, but if they do, then the directors of the owners of Hampshire Restaurants, Alem Holdings according to Companies House, which again may be out of date, include [REDACTED].</p> <p>Piers Warne solicitor told me at another licensing hearing in Bournemouth that he is instructed by on the FYEO licensing so I will forward this to him, and also mention the point on whether the Bournemouth licensing policy exists as well as the fact I am collating a list of relevant properties, which seems to grow every time I visit the town centre and see another planning application advertised.</p> <p>Kind regards</p> <p>Susan Stockwell</p>
2	Renewal	<p>Request for Confidentiality:</p> <p>I request that my personal details (name and contact information) be treated as confidential and not disclosed to the applicant or to the public.</p> <p>Summary of Objection</p> <p>I object to the renewal of the Sexual Entertainment Venue (SEV) licence for FYEO on the grounds that its continued operation is inappropriate having regard to the character of the relevant locality and the use of nearby premises, and that its existence undermines the Public Sector Equality Duty (PSED) under Section 149 of the Equality Act 2010.</p>

		<p>This objection draws on evidence of the broader social harm associated with SEVs, the nature of the locality in Bournemouth's central area, and the Council's legal obligations to eliminate sex-based discrimination and foster equality between women and men.</p> <p>1. Discretionary Grounds for Refusal (Paragraph 12(3)(d), Schedule 3, Local Government (Miscellaneous Provisions) Act 1982)</p> <p>1.1. Character of the Locality The character of Old Christchurch Road and the wider Bournemouth Central ward makes this location highly inappropriate for a Sexual Entertainment Venue. The area is a mixed-use town centre zone that includes:</p> <ul style="list-style-type: none"> • Multiple residential flats and HMOs, many occupied by young women and students; • A range of bars, restaurants and cafés, frequented by families and young people; • Public spaces used by local residents and visitors; • Faith venues, schools and community services within walking distance; • Numerous night-time economy businesses already associated with street harassment and safety concerns for women. <p>The presence of FYEO contributes to a normalisation of sexual objectification of women and an atmosphere of male entitlement, reinforcing a culture where women are treated as sexual commodities. Further, objectification has been proven to be linked to violence. This fundamentally undermines women's safety and comfort in public space, restricting their equal access to the town centre—contrary to the Council's equality obligations.</p> <p>1.2. Uses of Nearby Premises The premises are located near areas used by young people, women workers, and residents who should be entitled to move freely without encountering the visible and cultural impact of a strip club. Such establishments are incompatible with the Council's wider aims of promoting safe, inclusive, and family-friendly town centres.</p> <p>The Home Office Guidance (2010) explicitly permits refusal on these grounds where "the grant would be inappropriate having regard to the character of the relevant locality or the use to which any premises in the vicinity are put." The Council therefore has full discretion to refuse this renewal without breaching the law.</p> <p>1.3. Layout and Operation of the Premises FYEO's business model depends on the commercial sexualisation of women for male sexual gratification. No change to layout or management can mitigate the inherent harm and inequality this model perpetuates.</p> <p>The licensing framework recognises that regulation cannot make an inappropriate venue appropriate; hence, discretionary refusal is entirely justified.</p>
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	<p>2. Equality Law: Breach of the Public Sector Equality Duty (Equality Act 2010, s.149)</p> <p>The Council has a statutory duty to:</p> <ul style="list-style-type: none"> • Eliminate discrimination, harassment, and victimisation; • Advance equality of opportunity between men and women; and • Foster good relations between the sexes. <p>Licensing a strip club actively undermines these duties:</p> <ul style="list-style-type: none"> • It perpetuates sex-based discrimination, embedding the sexual subordination of women. • It creates ‘no-go zones’ for women in the surrounding area, as evidenced in feminist and criminological research. • It fosters hostility and harassment toward women, contradicting the goal of fostering good relations. <p>Two successful judicial reviews against Sheffield City Council established that failure to properly assess, and to act upon, the equality impacts of Sexual Entertainment Venues constitutes a breach of the Public Sector Equality Duty under Section 149 of the Equality Act 2010. The same reasoning applies here.</p> <p>The Council must explicitly consider whether licensing FYEO contributes to:</p> <ul style="list-style-type: none"> • The sexualisation and objectification of women; • The exclusion of women from public spaces; • The perpetuation of male entitlement and gender inequality. <p>If the Council accepts that these outcomes are likely, it must refuse the licence to comply with equality law.</p> <p>3. The Absence of a Valid SEV Policy Does Not Preclude Refusal</p> <p>BCP Council’s Sexual Entertainment Venue (SEV) Policy was quashed in 2022 following a Judicial Review. However, this does not prevent the Council from refusing licences. Under Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982, the Council retains full discretion to refuse an application on the grounds of locality, even in the absence of a formal policy.</p> <p>The Council must also comply with its separate duty under Section 149 of the Equality Act 2010 to consider equality impacts.</p> <p>Moreover, councils are entitled to “have a fresh look” at each renewal, as confirmed in <i>R v Birmingham City Council ex parte Sheptonhurst Ltd</i> [1990] 1 All ER 1026, and by Kolvin KC, the leading authority on SEV licensing.</p> <p>There is no legal right to a SEV licence and no requirement for the Council to demonstrate a material change in circumstances to justify refusal. The continued operation of FYEO can therefore be lawfully terminated.</p> <p>4. The Local Impact: Women’s Safety and Public Space</p>
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