

**Rebuttal
Need**

On behalf of the Appellant

Amy Gilham BA (Hons) MSc

**Appeal Reference:
APP/M5450/W/22/3299650**

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Amy Gilham
amy.gilham@turley.co.uk

Client
Turley

Our reference
SRHP3000

27 Sep 2022

1. Introduction

1.1 This report presents my rebuttal of the evidence presented by Ms Nicola Rankin in her Proof of Evidence on behalf of Harrow Council (the Council). It refers specifically to points made within Section 7 of Ms Rankin's Proof of Evidence with regards to very special circumstances and the need for a banqueting facility in Harrow.

1.2 It should be read in conjunction with my Proof of Evidence, the conclusions of which have not changed as a result of Ms Rankin's Proof of Evidence.

1.3 At paragraph 3.7 Ms Rankin states that:

'The Local Planning Authority does not accept the appellants [sic] argument in respect of the need for the development and considers that there is sufficient supply to meet demand for banqueting facilities within the borough and wider area'.

1.4 In my respectful opinion, the evidence presented by Ms Rankin in support of this argument demonstrates a lack of understanding of:

- The cultural requirements of South Asian and other ethnic weddings, which mean that certain dates are considered "ominous" and "auspicious" dates for weddings in the Muslim and Hindu calendars respectively (which I have explained further below). This means that some dates will be actively avoided for cultural reasons, whereas other periods in the calendar will be in high demand;
- How wedding venues that cater for South Asian and other ethnic weddings typically operate. While such a venue can be booked for a morning, afternoon or evening event this does not mean that three different events could take place on the same day for three different hosts. Annual capacity is not three sessions multiplied by 365 days. Set up and clean up periods are needed;
- The Council's own public sector equality duty. The Council's evidence and conclusions serve only to substantiate further the Appellant's case that there is a need to permit the proposed development as members of South Asian and other ethnic communities in Harrow have unequal access to appropriate celebratory spaces for weddings.

1.5 To assist in cross referencing, I have structured this rebuttal in accordance with the paragraph numbers used by Ms Rankin in her Proof.

1.6 I cover, in turn:

- Venue availability, taking account of operating capacity and ominous and auspicious dates. This responds to points made in paragraph 7.17 of Ms Rankin's Proof of Evidence.
- Alternative venues, including those in Harrow (Paragraph 7.8 and 7.20) and those elsewhere in the sub-regional market area (Paragraph 7.10)

1.7 My conclusion remains that there is a lack of appropriate wedding venues for South Asian and other ethnic communities within the London Borough of Harrow particularly, as well as more widely across the sub regional market area.

2. Venue Availability

Paragraph 7.17

- 2.1 Ms Rankin claims that the Appellant’s former venue in Wealdstone was “operating below capacity”.
- 2.2 This view is based on an interpretation of 2019 data presented in the Transport Statement and presents a misunderstanding of how venues operate as well as the cultural limitations of holding events on certain dates.

Operating Capacity

- 2.3 It is wrong to assume that, because Premier Banqueting’s former venue hosted more than one event on some days, it was therefore able to host multiple events all day, every day. If the venue was booked for an event by one host then it was unlikely that it would be booked by another host for the same day. This was to allow for set-up and clean-up periods.
- 2.4 On those days when Premier Banqueting hosted more than one event, these were typically held by the same host or family members. It is common in Hindu weddings to split the day into three parts comprising a religious ceremony in the morning, a civil wedding in the afternoon and the reception in the evening. This did not mean that Premier Banqueting had capacity to hold three different events, for three different sets of clients, every day.

Ominous and Auspicious Dates

- 2.5 In addition, there are auspicious and ominous dates on which to get married in the Hindu and Muslim calendars respectively. The religious calendars leave few dates on which people of these faiths can comfortably chose to hold their special event from a cultural perspective. I provide further detail of this below.
- 2.6 This is overlaid by a general preference in the UK to get married in warmer months. Over the last two decades August has been the most popular month in which to get married in England and Wales¹. Weekends are also generally preferred, with around half (48%) of all marriages taking place on a Saturday across England and Wales. For registered religious marriages alone, around three quarters (75%) occur on a Saturday².
- 2.7 This is important when considering Ms Rankin’s appraisal of availability at Premier Banqueting and at other venues in her proof. At various points Ms Rankin provides a broad indication of availability at alternative venues, based on the question: ‘Do you have many vacancies in your bookings over the next 12 months?’ (paragraph 7.19). She concludes that availability means sufficient supply. However:
- The question posed did not indicate what was meant by “many” vacancies.
 - The question posed did not invite any consideration of the wider need for venues for South Asian and ethnic weddings.

¹ ONS (2019) Number of marriages by day and month of occurrence by type of ceremony and marriage type, England and Wales.

² Ibid.

- The question invited no consideration of ominous and auspicious dates.

2.8 These omissions in the question meant that it could not properly be used as a means of assessing the sufficiency of supply.

Auspicious Dates (Hindu Faith)

2.9 For many people of Hindu faith, one of the most important pre-wedding rituals is finding the Shubh Muhurat (auspicious time) before carrying out any major life events or ceremonies. This is one of the oldest rituals which is widely respected and followed. Auspicious dates vary year on year and are based on the location of the wedding, sunrise to sunset calculations as well as astrological predictions including the birth (moon) sign of bride and groom³.

2.10 These dates are considered auspicious for the wellbeing, togetherness, and happiness of the couple and it is believed that marriage on these days will reduce the problems that may arise from life events and in marital life.

2.11 Table 1 below shows the preferred dates for Hindu communities to get married.

Table 1: Hindu Auspicious Dates⁴ (green=preferred dates)

³ These website references below are provided solely to ensure comprehensive referencing for sources. The Appellant does not expect the parties or the inspector to consult these websites: hindusphere.com/hindu-marriage-dates-2023-auspicious-hindu-wedding-dat2023/
www.wedmegood.com/blog/best-marriage-dates-in-2023-auspicious-hindu-wedding-dates/
www.ganeshaspeaks.com/predictions/astrology/auspicious-marriage-muhurats-and-dates/
www.drikpanchang.com/shubh-dates/shubh-marriage-dates-with-muhurat.html?geoname-id=2643743&year=2023

⁴ 'Guides for Brides' website www.guidesforbrides.co.uk/wedding-ideas/considerations-uk-wedding-dates/

	2022						2023						
	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
1	F	M	T	S	T	T	S	W	W	S	M	T	S
2	S	T	F	S	W	F	M	T	T	S	T	F	S
3	S	W	S	M	T	S	T	F	F	M	W	S	M
4	M	T	S	T	F	S	W	S	S	T	T	S	T
5	T	F	M	W	S	M	T	S	S	W	F	M	W
6	W	S	T	T	S	T	F	M	M	T	S	T	T
7	T	S	W	F	M	W	S	T	T	F	S	W	F
8	F	M	T	S	T	T	S	W	W	S	M	T	S
9	S	T	F	S	W	F	M	T	T	S	T	F	S
10	S	W	S	M	T	S	T	F	F	M	W	S	M
11	M	T	S	T	F	S	W	S	S	T	T	S	T
12	T	F	M	W	S	M	T	S	S	W	F	M	W
13	W	S	T	T	S	T	F	M	M	T	S	T	T
14	T	S	W	F	M	W	S	T	T	F	S	W	F
15	F	M	T	S	T	T	S	W	W	S	M	T	S
16	S	T	F	S	W	F	M	T	T	S	T	F	S
17	S	W	S	M	T	S	T	F	F	M	W	S	M
18	M	T	S	T	F	S	W	S	S	T	T	S	T
19	T	F	M	W	S	M	T	S	S	W	F	M	W
20	W	S	T	T	S	T	F	M	M	T	S	T	T
21	T	S	W	F	M	W	S	T	T	F	S	W	F
22	F	M	T	S	T	T	S	W	W	S	M	T	S
23	S	T	F	S	W	F	M	T	T	S	T	F	S
24	S	W	S	M	T	S	T	F	F	M	W	S	M
25	M	T	S	T	F	S	W	S	S	T	T	S	T
26	T	F	M	W	S	M	T	S	S	W	F	M	W
27	W	S	T	T	S	T	F	M	M	T	S	T	T
28	T	S	W	F	M	W	S	T	T	F	S	W	F
29	F	M	T	S	T	T	S		W	S	M	T	S
30	S	T	F	S	W	F	M		T	S	T	F	S
31	S	W		M		S	T		F		W		M

Ominous Dates (Muslim Faith)

- 2.12 There are no set dates for Islamic weddings and a couple is allowed get married at all times. However, there are some days on which marriage is not recommended based on ahadith (a collection of traditions containing sayings of the prophet Muhammad) and other historical and cultural reasons.
- 2.13 Some ahadith say that it is makruh (not recommended) to have a marriage ceremony on the days when the moon is in the constellation of the Scorpio (this is known as al-qamar fil aqrab or qamar dar aqrab)⁵, during the last two or three days of the lunar months, on Wednesdays, and on certain days of each month which are considered ill omen days (nahas); these days are the 3rd, 5th, 13th, 16th, 21st, 24th and 25th of lunar months⁶.
- 2.14 Muslims are typically against marriage during the first month of the Islamic calendar, Muharram, since those days are commemorated by Muslims as days of mourning for the massacre at Karbala or the day of the Prophet's death. In addition to this, Muslims tend not to get married in the month of Ramadan (the holy month) as Muslims fast from sunrise to sunset.
- 2.15 Table 2 shows the dates that are considered ominous.

⁵ www.world-federation.org/wp-content/uploads/2021/11/MooninScorpiotilltheyear2050_revised.pdf

⁶ www.qul.org.au/library/marriage-a-morals-in-islam/1149-the-time-for-marriage#:~:text=Generally%2C%20we%20can%20categorize%20these%20days%20into%20three%3A,days%20of%20the%20lunar%20months%2C%20and%20on%20Wednesdays.

Table 2: Islamic dates considered ominous based on ahadith/cultural/historical reasons (red=not recommended)

	2022						2023						
	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
1	F	M	T	S	T	T	S	W	W	S	M	T	S
2	S	T	F	S	W	F	M	T	T	S	T	F	S
3	S	W	S	M	T	S	T	F	F	M	W	S	M
4	M	T	S	T	F	S	W	S	S	T	T	S	T
5	T	F	M	W	S	M	T	S	S	W	F	M	W
6	W	S	T	T	S	T	F	M	M	T	S	T	T
7	T	S	W	F	M	W	S	T	T	F	S	W	F
8	F	M	T	S	T	T	S	W	W	S	M	T	S
9	S	T	F	S	W	F	M	T	T	S	T	F	S
10	S	W	S	M	T	S	T	F	F	M	W	S	M
11	M	T	S	T	F	S	W	S	S	T	T	S	T
12	T	F	M	W	S	M	T	S	S	W	F	M	W
13	W	S	T	T	S	T	F	M	M	T	S	T	T
14	T	S	W	F	M	W	S	T	T	F	S	W	F
15	F	M	T	S	T	T	S	W	W	S	M	T	S
16	S	T	F	S	W	F	M	T	T	S	T	F	S
17	S	W	S	M	T	S	T	F	F	M	W	S	M
18	M	T	S	T	F	S	W	S	S	T	T	S	T
19	T	F	M	W	S	M	T	S	S	W	F	M	W
20	W	S	T	T	S	T	F	M	M	T	S	T	T
21	T	S	W	F	M	W	S	T	T	F	S	W	F
22	F	M	T	S	T	T	S	W	W	S	M	T	S
23	S	T	F	S	W	F	M	T	T	S	T	F	S
24	S	W	S	M	T	S	T	F	F	M	W	S	M
25	M	T	S	T	F	S	W	S	S	T	T	S	T
26	T	F	M	W	S	M	T	S	S	W	F	M	W
27	W	S	T	T	S	T	F	M	M	T	S	T	T
28	T	S	W	F	M	W	S	T	T	F	S	W	F
29	F	M	T	S	T	T	S		W	S	M	T	S
30	S	T	F	S	W	F	M		T	S	T	F	S
31	S	W		M		S	T		F		W		M

2.16 These religious and cultural calendars for both the Hindu and Muslim communities result in a high demand for weddings on the auspicious dates, and on those dates which are not considered ominous.

2.17 Therefore, when it comes to assessing the capacity of Premier Banqueting’s former venue, it is not as simple as indicating that Premier Banqueting did not host three events every day on 365 days of the year. First, there is a need to provide time between events which limits the ability to hold more than one a day unless for the same host. Secondly, religious and cultural calendars mean that many will avoid getting married on a date which they consider to be inappropriate, while there will be peaks of demand on those dates considered beneficial to the marriage. It is

essential to have regard to these matters when appraising the capacity of Premier Banqueting's former venue.

- 2.18 In the same vein, Ms Rankin's enquiries about availability at a series of other venues (see her Table 1) needs to be approached with caution. Ms Rankin concludes that there is a good level of supply based on making generic enquiries about availability without having regard to religious calendars. This approach is too simplistic when seeking to meet the needs of Hindu and Muslim communities.

3. Alternative Venues

3.1 In her proof, Ms Rankin refers to some potential alternative venues that I had discounted from the analysis of alternative venues in my evidence.

3.2 In Table 3, I have put the venues mentioned by Ms Rankin in her proof in three categories:

- **Venues covered in my own proof of evidence/Appellant’s statement of case:** The majority of the venues (8) mentioned by Ms Rankin are within the sub-regional market area and I have already considered them in my own proof. I do not consider these further here, although I do include them for comparison in Table 7 at the end of my rebuttal.
- **Venues not in sub-region:** Seven of the venues identified by Ms Rankin do not lie within the identified sub-region (Harrow, Barnet, Brent, Watford and Hertsmere) and so are discounted from further analysis.
- **Venues discounted from analysis:** The remaining five venues identified by Ms Rankin were not included in my proof as I discounted them at an early stage of the analysis for reasons that included a lack of capacity, unavailability and/or conflicting uses. These reasons particularly applied to venues that primarily function as schools and sports stadiums.

Table 3: Potential alternative venues

Venues covered in Amy Gilham’s proof/Appellant’s statement of case	Venues not in sub-region	Venues discounted from Amy Gilham’s proof
Hilton Wembley, Brent	Radisson Hotel and Conference Centre Heathrow, Hillingdon	The Amber Suite – The Hive, Harrow
Clay Oven Banqueting, Brent	Waterfront Suite, Hounslow	Harrow School, Harrow
Kadwa Patidar Centre, Harrow	Vuk Banqueting Suite, Ealing	Canons Park School, Harrow
Cavendish Banqueting, Brent	Saffron D’Or, Ealing	Wembley Stadium, Brent
Bushey Country Club, Hertfordshire	Stockley Marquee, Hillingdon	StoneX Stadium, Barnet
Holiday Inn Wembley, Brent	Silverdine Banqueting and Conferences, Hounslow	
Byron Hall – Harrow Leisure Centre, Harrow	North Mymms Park, Welwyn Hatfield	
Oakington Manor Primary School, Brent (this was assessed but not discussed in detail as I concluded that it did not meet requirements)		

- 3.3 To assist the inquiry, I provide further information below about the six venues in the right-hand column that I discounted from my previous analysis.
- 3.4 In addition, a crib sheet for each of these five venues is contained in Appendix 1. I also include my crib sheet for Oakington Manor Primary School, Brent which was not included in my original proof as I assessed it as not meeting requirements for a variety of reasons identified in the crib sheet.
- 3.5 As part of the preparation of my rebuttal I contacted these venues through making telephone calls and online enquiries on venue websites. Telephone calls were made to all the five venues included within the crib sheets.
- 3.6 I conclude that it remains my judgment that these five venues should be discounted as potential alternatives as they do not make a realistic or reliable contribution to the supply of venues that are fully able to cater for the weddings of South Asian and other ethnic communities. I provide further details below.

Additional Venue 1: Amber Suite, The Hive, Harrow (para. 7.8)

- 3.7 I discounted the Amber Suite at the Hive at an early stage of my initial analysis on the basis that The Hive's primary use is as a football stadium with associated football activities including regular fixtures as well as community projects.
- 3.8 Noting Ms Rankin's reliance on this venue I have researched its suitability further.
- 3.9 At first blush, it might appear that the Amber Suite is a good comparable for the Premier Banqueting offer. It appears to target the Asian wedding market on its website and has capacity for over 300 guests. However, my analysis has highlighted several issues with the venue which mean that it cannot fairly be relied upon as a wedding venue that meets the needs of South Asian and other ethnic communities.

Range and frequency of other uses

- 3.10 The Hive is not a venue that is dedicated solely to weddings. It is a multi-use sports-focused facility which is used by several different groups over the course of a day or week. The availability of the Amber Suite is limited as a wedding venue, either because the Amber Suite itself has been booked for another purpose such as a conference, general party or corporate event, or because other uses being carried out in the wider Hive complex make it unattractive to contemplate the use of the Amber Suite to host a wedding celebration. I expand on this below.
- 3.11 Figure 1 and 2 overleaf show the aerial view of The Hive with the location of different activities indicated.

Figure 1: Aerial view of The Hive grounds (green=football pitches, red=stadium)



Source: Google Maps⁷; Turley coding added

⁷ Google Maps: www.google.co.uk/maps/place/Hive+London/@51.6027419,-0.2942636,1208m/data=!3m1!1e3!4m5!3m4!1s0x4876140393d9ce21:0xe1639c71c78ee630!8m2!3d51.6026098!4d-0.2908688

Figure 2: Aerial view of The Hive Stadium (First Floor Uses: red=Amber Suite, blue=offices and meeting rooms, yellow=gym, green=football pitches, orange=car park)



Source: Bing Maps⁸ ; Turley coding added

3.12 A review of floorplans contained within planning application reference P/0665/13 indicates the following uses in the East Stand in which the Amber Suite is located.

⁸ Bing Maps: www.bing.com/maps?q=the+hive+london&FORM=HDRSC6

Table 4: The Hive – East Stand Uses

Floor	Use
Ground floor	<ol style="list-style-type: none">1. Sports injury clinic2. Changing rooms3. Bar/cafe with kitchen and cellar4. Banqueting reception/pre function area5. Gym & office reception and club shop6. Toilets
First floor	<ol style="list-style-type: none">7. Banqueting suite8. Gym9. Changing rooms10. Gym studios11. Toilets

Source: Planning Application Reference P/0665/13

3.13 The variety of uses hosted on a regular basis at The Hive are shown in Table 5 below.

Table 5: Regular Uses of The Hive

Use/Activity	Note
Football stadium	Used regularly by: Barnet Football Club London Bees Women’s Football Club Tottenham Hotspur Women’s Football Club (until recently) ⁹ These teams both regularly train and host home fixtures at the ground. The stadium can also be hired for corporate football matches ¹⁰ .
Football pitches	Available for public hire ¹¹ through a booking system ¹² . They include: 1 x 3G pitch 1 x 4G pitch 1 x 5G pitch 9 x 5 a-side pitches

⁹ As of 2022/23, Tottenham Hotspur Women’s FC will play home games at Brisbane Road Stadium, home of Leyton Orient FC. Please see Tottenham Hotspur Women’s FC website: www.tottenhamhotspur.com/tickets/buy-tickets/womens-tickets/

¹⁰ www.thehivelondon.com/stadium-hire/

¹¹ www.thehivelondon.com/pitch-hire/

¹² www.venutoolbox.com/barnetfc/asp/bookBookings.asp

Medical centre	Operated by TIC Health, a company providing diagnostic technology and medical services which is known for working with elite sports people and performers. The medical centre is well used by Premier League footballers and international football teams.
Gym	Operated by TIC Health and open to members and the general public.
Restaurant and bar	Open 7am-10pm and 7am-1am on Fridays and Saturdays. Available for private hire and bespoke catering.
Motorcycle Driving School	Operated by Universal Motorcycle Training Training site authorised and regulated by the Driver and Vehicle Standards Agency (DVSA), fully-accredited by the Motorcycle Industry Association (MCIA).
Filming	The stadium can be hired for filming of commercials. Companies that have held commercial shoots at The Hive include: Adidas, Nike, Puma, New Balance, Virgin Money, Corals, Beats by Dr. Dre, Pepsi, Cadbury's and Unibet.
Activities run by the Bees in the Community Foundation	
Soccer School	Attended by children from reception year to year 9 Saturdays (9am-2pm) and Tuesdays (5pm-6pm)
Holiday Camp	Children aged 5-14 years Held during school holidays (i.e. October half term, Christmas fortnight, February half term, Easter fortnight, June half term and summer holidays)
Curriculum and extra-curricular support for physical education	Sports-related school tournaments are open to all schools in Barnet, Harrow, Hertsmere and Brent ¹³ .
Birthday party packages	Community coaches oversee children playing football games on the 3G pitches based at The Hive, followed by food and cake within The Hive Bar, in view of the stadium pitch ¹⁴ .
Barnet FC Walking Football	Slower paced football aimed mainly at over 50's ¹⁵
Bees Academy Football and Education Programme	For young people aged 16-18 ¹⁶
Premier League Kicks ¹⁷	Activities for youngsters including sports, coaching, music, educational and personal development sessions to reduce anti-social behaviour.

¹³ thehivefoundation.com/schools

¹⁴ thehivefoundation.com/birthday-parties

¹⁵ thehivefoundation.com/walking-football

¹⁶ thehivefoundation.com/bees-academy

¹⁷ thehivefoundation.com/premier-league-kicks

3.14 I have checked availability on the pitch booking system and found that the pitches are well used with many slots pre-booked months in advance. Figure 3 below shows a snapshot of bookings across two different randomly entered dates.

Figure 3: Snapshot of the Hive pitch booking system.

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		AstroTurf Pitches							
		4G			3G			5G (FIFA 2*)	
		4G - A	4G - B	4G - C	3G - A	3G - B	3G - C	5G - A	5G - B
Saturday Morning 24 Sep 2022	8:00								
	9:00				Booked	Booked		Booked	
	10:00	Booked	Booked	Booked	Booked	Booked		Booked	
	11:00	Booked	Booked	Booked	Booked	Booked			
	12:00				Booked	Booked			
	13:00				Booked	Booked			
	14:00				Booked	Booked			
	15:00								
	16:00								
	17:00								
Saturday Afternoon 24 Sep 2022	18:00								
	19:00	Booked	Booked	Booked	Booked				
	20:00	Booked	Booked	Booked	Booked	Booked			
	21:00		Booked		Booked	Booked		Booked	
	22:00							Booked	
								Booked	

¹⁸ thehivefoundation.com/premier-league-primary-stars

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		AstroTurf Pitches						
		4G			3G			5G
		4G - A	4G - B	4G - C	3G - A	3G - B	3G - C	5G - A
Thursday Morning 27 Oct 2022	8:00							
	9:00				Booked	Booked	Booked	
	10:00				Booked	Booked	Booked	
	11:00	Booked	Booked	Booked	Booked	Booked	Booked	
	12:00	Booked	Booked	Booked	Booked	Booked	Booked	
	13:00	Booked	Booked	Booked	Booked	Booked	Booked	
	14:00	Booked	Booked	Booked	Booked	Booked	Booked	
	15:00							
	16:00							
	Thursday Afternoon 27 Oct 2022	17:00						
18:00		Booked			Booked	Booked		
19:00		Booked			Booked	Booked		
20:00		Booked	Booked					
21:00				Booked				
22:00								

3.15 Figures 4 and 5 show the range of different uses in operation, including images of these taking place at the same time as weddings.

Figure 4: Image of the Universal Motorcycle Training driving school at the Hive



Source: Google Maps¹⁹

¹⁹ Google Maps: www.google.co.uk/maps/place/Universal+Motorcycle+Training+-+Edgware+-+CBT/@51.6014959,-0.2900773,3a,98.6y,90t/data=!3m8!1e2!3m6!1sAF1QipPHWNhK81AwZj3w0jPM9m7DNshCeRCX5SSD2lxe!2e10!3e12!6shttps:%2F%2Fih5.googleusercontent.com%2Fp%2FAF1QipPHWNhK81AwZj3w0jPM9m7DNshCeRCX5SSD2lxe

Figure 5: Images of weddings alongside other uses



Source: Amber Suite Website²⁰



Source: Amber Suite Website

%3Dw203-h135-k-
no!7i800!8i533!4m12!1m6!3m5!1s0x4876140393d9ce21:0xe1639c71c78ee630!2sHive+London!8m2!3d51.602609
8!4d-0.2908688!3m4!1s0x48761406d817da2d:0x3237e6218704994a!8m2!3d51.6014904!4d-0.2900755

²⁰ Amber Suite Website: www.ambersuite.co.uk/gallery.html



Source: Amber Suite Website



Source: Amber Suite Website

3.16 Table 6 below shows dates for home football match fixtures for Barnet FC²¹ (blue) and London Bees Women's FC²² (red). It also shows the dates of the Soccer School and Walking Football

²¹ www.barnetfc.com/fixtures

²² fulltime.thefa.com/fixtures.html?selectedSeason=696639056&selectedFixtureGroupKey=&selectedDateCode=all&selectedClub=174911115&selectedTeam=&selectedRelatedFixtureOption=2&selectedFixtureDateStatus=&selectedFixtureStatus=&previousSelectedFixtureGroupAgeGroup=&previousSelectedFixtureGroupKey=&previousSelectedClub=&itemsPerPage=25

sessions²³ (yellow) as well as the holiday camps²⁴ (green) based on school term dates as given on Harrow Council's website²⁵.

Table 6: Activity at The Hive

Colour	Description
Blue	Barnet FC fixtures
Red	London Bees Women's FC fixtures
Yellow	Soccer School and Walking Football sessions
Green	Holiday Camps (term breaks)

The table is shown overleaf.

²³ www.venuetoobox.com/barnetfc/asp/bookTickets.asp?dept=Special+Events&specialEventType=Community&specialEventCategoryID=%7B1E85F15A%2D7DEE%2D4FF7%2DA43A%2DBD1316072E74%7D&venueID={C6A3152A-0FC2-4845-A2AE-309490E8970C}

²⁴ thehivefoundation.com/

²⁵ www.harrow.gov.uk/schools-learning/school-term-dates

	2022						2023						
	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
1	F	M	T	S	T	T	S	W	W	S	M	T	S
2	S	T	F	S	W	F	M	T	T	S	T	F	S
3	S	W	S	M	T	S	T	F	F	M	W	S	M
4	M	T	S	T	F	S	W	S	S	T	T	S	T
5	T	F	M	W	S	M	T	S	S	W	F	M	W
6	W	S	T	T	S	T	F	M	M	T	S	T	T
7	T	S	W	F	M	W	S	T	T	F	S	W	F
8	F	M	T	S	T	T	S	W	W	S	M	T	S
9	S	T	F	S	W	F	M	T	T	S	T	F	S
10	S	W	S	M	T	S	T	F	F	M	W	S	M
11	M	T	S	T	F	S	W	S	S	T	T	S	T
12	T	F	M	W	S	M	T	S	S	W	F	M	W
13	W	S	T	T	S	T	F	M	M	T	S	T	T
14	T	S	W	F	M	W	S	T	T	F	S	W	F
15	F	M	T	S	T	T	S	W	W	S	M	T	S
16	S	T	F	S	W	F	M	T	T	S	T	F	S
17	S	W	S	M	T	S	T	F	F	M	W	S	M
18	M	T	S	T	F	S	W	S	S	T	T	S	T
19	T	F	M	W	S	M	T	S	S	W	F	M	W
20	W	S	T	T	S	T	F	M	M	T	S	T	T
21	T	S	W	F	M	W	S	T	T	F	S	T	F
22	F	M	T	S	T	T	S	W	W	S	F	T	S
23	S	T	F	S	W	F	M	T	T	S	T	F	S
24	S	W	S	M	T	S	T	F	F	M	W	S	M
25	M	T	S	T	F	S	W	S	S	T	T	S	T
26	T	F	M	W	S	M	T	S	S	W	F	M	W
27	W	S	T	T	S	T	F	M	M	T	S	T	T
28	T	S	W	F	M	W	S	T	T	F	S	W	F
29	F	M	T	S	T	T	S		W	S	M	T	S
30	S	T	F	S	W	F	M		T	S	T	F	S
31	S	W		M		S	T		F		W		M

- 3.17 Whilst Table 6 gives an indication of the level of activity and the availability at The Hive, it overestimates availability as it does not include football club training sessions, bookings for the football pitches, planned curricular and extra-curricular activities, school tournaments, birthday parties, or activities associated with the Bees Academy, Premier League Kicks and Premier League Primary Stars or planned weddings/conferences.
- 3.18 The very wide range of activities hosted at The Hive, the spaces they use within the site and their timing and frequency mean that it is highly likely that couples and families who host weddings in the Amber Suite will encounter large groups of other users, whether that be hundreds of football fans during matches, users of the TIC health medical centre and gym, people playing five-a-side, and/or children and parents participating in Soccer School and other activities organised by the Bees in the Community Foundation. In my judgment, such a setting would not meet the ordinary person's expectations of a wedding venue, irrespective of that person's culture or religion. However, the clash of uses in such a setting makes the venue especially ill-suited to hosting the gender-segregated weddings required in some South Asian cultures.
- 3.19 Ms Rankin's evidence confirms that The Hive is currently busier than usual due to latent demand as a result of the pandemic, but that "*they do normally have plenty of availability*". She infers from this that there must therefore be a sufficient supply of wedding venues that meet the needs of South Asian and ethnic communities. I disagree:
- Lack of availability due to a backlog of demand indicates that the venue would struggle to accommodate the level of demand usually met by Premier Banqueting, or potentially even a large proportion of this demand;
 - Having plenty of availability in normal times indicates a low level of bookings and that the venue does not directly meet the needs of those seeking a wedding venue.

Shared spaces

- 3.20 In view of the range of uses being carried out within the wider Hive complex, an element of "corridor clash" is inevitable. Using the 360° tour²⁶ tool on the Amber Suite's website, it is evident that other uses are just a corridor away from the Amber Suite. It appears that users of the gym, TIC health centre, the Hive restaurant and bar, offices and meeting rooms share their entrance access with users of the Amber Suite. See Figure 6 and 7 below.

²⁶ www.ambersuite.co.uk/360.html

Figure 6: Image of the shared entrance (red=entrance to Amber Suite, Gym and fitness centre, offices and Restaurant and Bar and yellow=match day hospitality entrance, club shop and reception)



Figure 7: Images of the shared corridor on the first floor (top image) and ground floor lobby (bottom image) at The Hive (red=direction to Amber Suite, yellow=direction to gym, meeting rooms and other uses)



Planning Considerations

- 3.21 Planning permission was granted for "Redevelopment for enlarged football stadium and clubhouse, floodlights, games pitches, banqueting facilities, health and fitness facility, internal roads and parking" (ref: P/0002/07) on 8th April 2008.
- 3.22 A subsequent officer's report for a planning permission that proposed a first floor extension to the east stand to create a lounge for the banqueting suite and new entrance (ref: P/4096/14), which has not been implemented states on page 4:
- 3.23 *"The development approved under planning application reference: P/0002/07 included a banqueting suite within the East stand as an ancillary use to the main sports facilities. Although the proposal is to enlarge this banqueting suite, it would nonetheless remain ancillary to the main sports facilities."*
- 3.24 The Harrow Core Strategy (2012) Policy CS9 D confirms that the site will be maintained as an important sporting destination and opportunities for enhanced community access will be sought. The site is allocated for "Community outdoor sports use" (Site MOS 5) in the Council's Site Allocations Local Plan (2013).
- 3.25 Whilst the Amber Suite might first appear, therefore, to provide a reasonable comparable to Premier Banqueting, my initial reason for not considering it to be a reliable and reasonable alternative venue within the Borough remains. The primary use of The Hive is as a football stadium.

Summary of Amber Suite at The Hive

- 3.26 As well as hosting regular fixtures and training sessions, The Hive also hosts 15 regular uses within the weekly and annual calendar. Plotting these uses, where their dates are known, shows that several uses are carried out very frequently on the wider site, often at the same time as other uses.
- 3.27 This means that a wedding party using the Amber Suite would be highly likely to encounter those participating in informal sport and leisure activities, both within the wider site as well as within the building in which the Amber Suite is situated given the shared access with uses including a gym.
- 3.28 I consider this to be inconsistent with what many engaged couples would reasonably consider to be appropriate for their wedding day. It is also difficult to conceive of the external space outside the Amber Suite providing an appropriate backdrop for wedding photography if the spaces are being used for football, other sports or children's activities.
- 3.29 However, even if the Amber Suite were a like-for-like comparison for Premier Banqueting's offer (which it is not), it alone cannot meet the need for venues that can accommodate South Asian and other ethnic weddings in Harrow, nor could it accommodate all of the bookings which would otherwise have been placed at Premier Banqueting (an average of 231 a year).

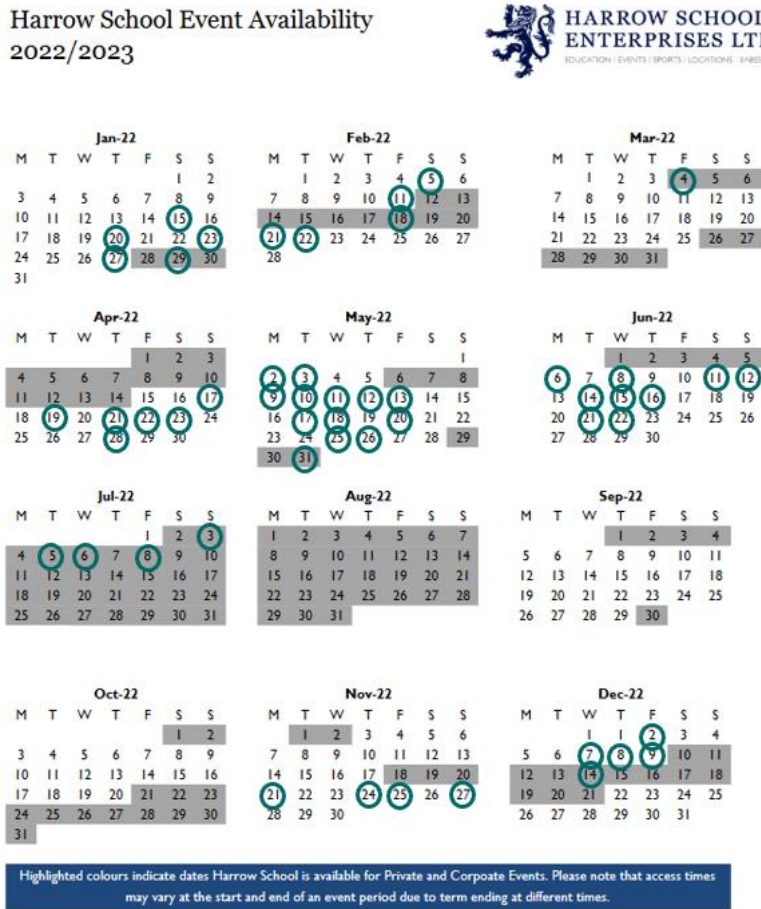
Additional Venue 2: Harrow School, Harrow (para. 7.8)

- 3.30 I considered Harrow School in my initial sifting of alternative venues, but I dismissed it on the basis that it does not have the capacity to accommodate over 300 guests for a seated reception. This was my starting point when assessing all venues.
- 3.31 Ms Rankin notes that the *“facilities are currently being refurbished and they have advised they will be able to provide this by 2024”*. This does not provide sufficient certainty about future provision and the venue cannot be considered to contribute to the current supply.
- 3.32 Ms Rankin further claims that Harrow School can *“host weddings and other events for Asian/ethnic communities”*. However, there are four main reasons why Harrow School would generally be considered inappropriate as a venue for a South Asian wedding:
- It is a school. There will be few couples of any faith who would like to marry in a school.
 - It is ‘a Christian foundation with the Chapel at its heart’²⁷. While other faiths are accepted, the dominance of the Christian faith means that it is highly unlikely to be considered appropriate by most couples and families as a venue for a South Asian wedding.
 - Availability to host weddings is based on term times and generally limited to weekends and school holidays. Harrow School’s availability calendar²⁸ is show in Figure 8 below. In considering the preference for those of Hindu faith to get married during auspicious dates (circled in green), many dates considered fruitful and associated with prosperous marriages are unavailable. In 2022, Harrow School is not available for 83% of the dates considered auspicious for the Hindu community, with only 9 auspicious dates available for private and corporate events.
 - As stated above, the venue does not have the capacity to accommodate over 300 guests for a seated reception. This is why I quickly ruled it out as a viable alternative, a judgment which I maintain.

²⁷ Harrow School website – FAQs www.harrowschool.org.uk/boarding/frequently-asked-questions

²⁸ [Harrow School Enterprises website www.harrowschoolenterprises.com/wp-content/uploads/2021/12/Copy-of-Current-Availability-Calendar-2022.pdf](http://Harrow%20School%20Enterprises%20website%20www.harrowschoolenterprises.com/wp-content/uploads/2021/12/Copy-of-Current-Availability-Calendar-2022.pdf)

Figure 8: Harrow School Availability Calendar (green circle = auspicious date)



- 3.33 Table 1 of Ms Rankin’s proof identifies that the venue has a ‘small number of bookings’ over the next 12 months.
- 3.34 This leads me to conclude that the venue is not appropriate for the South Asian and other ethnic communities, particularly given the closure of both Premier Banqueting and VIP Lounge, and the aforementioned latent demand following Covid lockdowns, which would have had the opposite effect of increasing bookings at suitable venues.
- 3.35 For all these reasons, I do not consider that Harrow School provides a suitable, comparable alternative venue to meet the wedding needs of South Asian and other ethnic communities.

Additional Venue 3: Canons Park School, Harrow (para. 7.20)

- 3.36 I was unable to find published information on the wedding venue offer of Canons Park School. However, its primary use as a school would limit availability for wedding use due to term time restrictions in the same way as I found for Harrow School.
- 3.37 The lack of publicly available information on the school as a wedding venue also leads me to conclude that this is not a key offer of the school and that prospective couples would similarly struggle to find any information on it and therefore not identify it within their search for venues. It cannot therefore be considered to make a reasonable contribution to the supply position.

Additional Venue 4: Wembley Stadium, Brent (para. 7.10)

- 3.38 As a major football stadium of national importance, Wembley Stadium hosts a wide range of sporting related activities on a regular basis. It also regularly hosts large-scale music concerts.
- 3.39 According to the Wembley Stadium website upcoming events²⁹, include but are not limited to:
- England v Germany – 26th September 2022
 - England v USA – 7th October 2022
 - England v Czech Republic 2022 – 11th October 2022
 - Broncos v Jaguars – 30th October 2022
 - The Vitality Women’s FA Cup Final 2023 – 14th May 2023
 - Harry Styles: Love on Tour 2023 – 13th June-17th June 2023
- 3.40 There are 8 rooms available to hire for private and corporate events including wedding functions³⁰. Five of these rooms have the capacity to accommodate over 300 wedding guests for a banquet including:
- The Bobby Moore Room - 1,900 guests
 - The Great Hall - 1,050 guests
 - Venue and Arc - 500 guests
 - Atrium - 450 guests
 - Wembley Suite – 400 guests
- 3.41 The website clearly shows that packages are available for conferences but there are no details provided with regards to wedding packages³¹. This is also made evident when considering that out of 46,019 google reviews³², only two reviews comment on weddings. This indicates that the venue is not a preferred venue for a wedding.
- 3.42 The range and frequency of these sports, music, entertainment and conference events both limit availability for weddings as well as presenting a clash with the cultural and religious requirements of South Asian and other ethnic communities. It is not a realistic alternative venue.

²⁹ Wembley Stadium events: www.wembleystadium.com/events (accessed 27/09/2022)

³⁰ Wembley Stadium Venue Hire: www.wembleystadium.com/venue-hire

³¹ [Wembley Stadium packages: www.wembleystadium.com/venue-hire/packages](http://www.wembleystadium.com/venue-hire/packages)

³² Google review: www.google.co.uk/maps/place/Wembley+Stadium/@51.5568689,-0.3038639,2058m/data=!3m2!1e3!5s0x48761181d3a805e3:0x9d43d00915aa8b10!4m7!3m6!1s0x48761181d57a876d:0xa64f9f185de8e097!8m2!3d51.5560247!4d-0.2796177!9m1!1b1 (accessed 27/09/2022)

Additional Venue 5: StoneX Stadium, Barnet (para. 7.10)

- 3.43 StoneX stadium is the home of Saracens Rugby club. Saracens compete in Premiership Rugby. The stadium offers multiple facilities for various uses³³. As part of their venue offer, StoneX stadium has an 800-space car park and offers three venue options which can accommodate a large number of guests including:
- Tulip Club – 300 guests for dinner, 220 for dinner and dance
 - StoneX Suite – 700 guests for dinner
 - Olympic Bar – up to 2,500 guests
- 3.44 Whilst the venue has inhouse catering, it also offers dry hire as the website states that they would be happy to discuss exact requirements “for speciality, cultural or religious catering such as Kosher or Asian cuisine.”
- 3.45 StoneX Stadium includes the following facilities:
- A full-size 4G competition standard rugby pitch suitable for various sporting events which can be booked privately for training sessions, school matches, family fun days or sports days
 - An 8 lane, fully marked 400m athletics track available to hire for a range of athletic competitions (availability subject to rugby season)
 - Outside space and piazza which can be used for various events/activities from pop-up cinemas and employee fun days to weddings or marquee ceremonies
 - 16 executive boxes
 - The Hundred Club bar and restaurant
 - Conference rooms for uses such as corporate away days
- 3.46 The range and frequency of these uses both limit availability for weddings as well as presenting a clash with the cultural and religious requirements of South Asian and other ethnic communities. It is not a realistic alternative venue.

Summary: All venues

- 3.47 Table 7 overleaf summarises information about all the venues identified within Ms Rankin’s proof which are located in the sub-regional geography. I have included Premier Banqueting at Wealdstone for comparison.
- 3.48 I have identified where each venue meets (or does not meet) the criteria I applied in the initial assessment in my proof, and then summarized the outcome of further criteria considered in this rebuttal. An ‘X’ in the table indicates that the criterion is met.

³³ [StoneX Stadium website: stonexstadium.com/#rooms](https://stonexstadium.com/#rooms)

3.49 It is evident that none of the venues meet all of the criteria. Where venues meet the majority of criteria with regards to the specific wedding offer, there are overarching constraints on the use of the space as a wedding venue such as:

- Suitability of the building (for example, in disrepair)
- Suitability of the location (for example, on an industrial estate)
- Wider uses of the venue limiting its availability or resulting in a conflict of uses
- Future operation not guaranteed (for example, undergoing refurbishment or lease not being extended).

Table 7: Venues Matrix Against Criteria

Venue	In LB Harrow	Mandap /stage	Dietary Requirements met ⁱ	In-house catering (not dry hire)	Packages available	Cultural understanding/ gender segregation	Dedicated Venue	No clear issues re clash of use of space *	General availability against religious calendar	No issues/uncertainty re future operation **	Not in an industrial location / business park / notably poor quality building
Premier Banqueting	x	x	x	x	x	x	x	x	x		x
Hilton Wembley, Brent			x	x	x	x				x	x
Clay Oven Banqueting, Brent		x	x	x	x	x	x	x	x	x	
Kadwa Patidar Centre, Harrow	x	x				x	x	x	x	x	
Cavendish Banqueting, Brent		x	x	x	x	x	x	x	x		
Bushey Country Club, Hertfordshire		x	x	x	x	x	x	x	x		x
Holiday Inn Wembley, Brent (CLOSED)		x	x	x	x	x			x		x
Byron Hall – Harrow Leisure Centre, Harrow	x	x		x	x	x					x

Oakington Manor Primary School, Brent		x				x		x	x
The Amber Suite – The Hive, Harrow	x	x	x	x	x	x			x
Harrow School, Harrow	x	x		x	x	x			x
Canons Park School, Harrow	x		<i>It has not been possible to complete the table due to a lack of information available</i>						
Wembley Stadium, Brent		x		x	x				x
StoneX Stadium, Barnet		x	x	x	x	x			x

* No clear issues re clash of use of space .e.g. stadium/school would have potential conflict

** No issues/uncertainty re future operation ** i.e. lease not known to be ending or on short term lease, or undergoing redevelopment

4. Conclusion

- 4.1 In my respectful opinion, Ms Rankin's evidence demonstrates that the Council does not have an adequate understanding of the particular religious and cultural requirements of South Asian weddings. This has compromised the Council's assessment of the availability and suitability of other venues to be used for weddings by the South Asian and ethnic communities of Harrow.
- 4.2 Ms Rankin's assessment of capacity at Premier Banqueting, and her suggestion that further venues should be considered as potential alternatives by the Council, do not take due account of operational requirements nor take into account the constraints imposed by ominous and auspicious religious dates.
- 4.3 I do not agree that the additional venues identified by Ms Rankin indicate that there is a sufficient level of available provision. Those additional venues identified within the sub-regional market area can be discounted for several reasons, in particular:
- Conflicting uses taking place while weddings are held, such as sporting activities or related uses;
 - Limited availability of high-demand dates in religious calendars due to sporting fixtures/other activities as well as school terms.
- 4.4 In my view, Ms Rankin's evidence and conclusions serve only to substantiate further the Appellant's case that there is a need to permit the proposed development as members of South Asian and other ethnic communities in Harrow have unequal access to appropriate celebratory spaces for weddings.

Appendix 1: Venue Crib Sheets

Turley Office
Brownlow Yard
12 Roger Street
London
WC1N 2JU

T 020 7851 4010

Turley