

**Proof of Evidence  
Need**

**On behalf of the Appellant**

Amy Gilham BA (Hons) MSc

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

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**Client**  
Sairam (Holdings) Ltd

**Our reference**  
SRHP3000

September 2022

# 1. Statement of Expert Witness

- 1.1 I am an economic development specialist with 17 years' professional experience. I hold a Bachelor's degree with Honours in Human Geography from the University of Sheffield and a Master of Science in Urban Regeneration from the Bartlett (Faculty of the Built Environment) at University College London (UCL).
- 1.2 I am a Director within the Economics team in Turley, a national planning and development consultancy, based in its London office. I joined Turley in 2015 to expand the Economics team in London. Prior to this I held positions at Regeneris Consulting and AECOM, focusing on regeneration, economic impact and social infrastructure.
- 1.3 Throughout my career I have specialised in analysis of baseline and other statistical data in relation to different types of property development to understand the need for development and its impact on communities and places. This work has included over 50 assessments of social infrastructure and over 30 assessments of market supply and demand for different types of property development. It has also included over 100 assessments of economic impact.
- 1.4 I confirm that the opinions expressed are my true and professional opinions.

## 2. Scope of Evidence

- 2.1 My evidence considers the need for a venue to cater for events held by the South Asian and other ethnic communities in the London Borough of Harrow and the role that Premier Banqueting has served, and wants to continue to serve, in meeting this need.
- 2.2 Although Premier Banqueting is a private entity it has provided essential social infrastructure for major life events within this community.
- 2.3 The information contained within my Proof of Evidence draws on a range of analysis and data including those obtained through desk-based resources such as the Office for National Statistics. I also draw on information requested from the Appellant with regards to the operation of Premier Banqueting, its customer base, the enquiries it receives from the public, and its employment and supply chain relationships.
- 2.4 Further detail on the information I provide within this Proof of Evidence can be found in supporting tables and briefing notes which are appended. It should be read in conjunction with Appendix 1 (Core Document 83) which sets out the Assessment of Need submitted with the Statement of Case.

### **The Demography of Harrow**

- 2.5 A large proportion of the residents of the Borough of Harrow are members of Asian and ethnic communities. More than one in three residents identify as Asian/British Asian (42.6%). This is higher than across London as a whole (27.1%). It also has a much higher proportion of residents of Indian descent (34.3%) compared to London (7.7%). Harrow therefore plays a critically important role in providing homes for members of these communities and meeting their needs.

### **The Role of Premier Banqueting in Serving the Community**

- 2.6 Until recently, Premier Banqueting provided a venue of the size and specification to cater for weddings for members of the South Asian and some other ethnic communities. It was one of only a handful of suitable venues across an identified sub-regional market (comprising Harrow, Hertsmere, Watford, Brent and Barnet local authority areas) able to host such events, and the only such venue within London Borough of Harrow itself.
- 2.7 Between 2014 and 2019<sup>1</sup> Premier Banqueting hosted an average of 231 events each year, with an average of 298 guests per event. Hosts of events (e.g. couples entering into marriage) were predominantly of Indian and Pakistani background.
- 2.8 The operation of the business also supported South Asian and other ethnic communities in the area through its supply chains (25 key supply chain businesses, 8 of which were located in Harrow, with a large employee base of a South Asian or ethnic

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<sup>1</sup> Covid years (2020 and 2021) and year of closure (April 2022) are omitted as these are not a true reflection of the operation of the venue

background). Of its staff, 100% (18) of Premier Banqueting's employees were from South Asian backgrounds and 12 were residents of London Borough of Harrow.

- 2.9 When Premier Banqueting's venue on Canning Road was operating, the number of enquiries it received for events far surpassed the number of events it could hold in a year. A lack of suitable alternative venues within the area led to a proportion of event hosts using venues located up to 300km away, despite Harrow being the location of preference for many. The closure of the venue means that the level of unmet need amongst the South Asian and other ethnic community will be increased still further.

### **The Council's Public Sector Equality Duty**

- 2.10 As a local authority and public body, Harrow Council has a duty to carry out its functions having due regard to the need to advance equality of opportunity for its residents. This public sector equality duty is set out in the Equality Act 2010 (hereafter referred to as "the Act"). All decisions, including those related to planning, must be made in compliance with this duty and take account of the impact of the decision on groups who share a protected characteristic (as set out in the Act) and which include race and religion.

- 2.11 The report prepared by the Council's officers on the application for planning permission in this case stated that:

*"In determining this planning application, the Council has regard to its equalities obligations including its obligations under section 149 of the Equality Act 2010. For the purposes of this application there are no adverse equalities issues."*

(London Borough of Harrow, Planning Committee, 17th November 2021, page 4 – Core Document 79)

- 2.12 It is not clear on what basis this analysis of "equalities obligations" has been carried out or the basis for the conclusions reached by the Council.

- 2.13 The Council's Statement of Case (Core Document 84) states that:

*"...the Council do not accept that the level of need is not capable of being met in Harrow and the sub regional market area from existing facilities"*

(para 5.10)

- 2.14 and

*"the Council consider there are a number of other existing venues within both Harrow and the sub regional market area which would be suitable to hold events for weddings for the South Asian community and other ethnic groups. The Council consider that whilst the proposal may increase choice for communities, this is not the same as meeting unmet need"*

(para 5.11)

2.15 It is not clear on what basis the Council asserts that there is sufficient provision within the sub-regional market area to meet the needs of these communities. My evidence includes analysis of potential alternative venues and concludes that there is no comparable venue to Premier Banqueting within Harrow and only five across a sub-market geography comprising five authority areas, despite this location having a large population of residents who are members of South Asian and other ethnic communities.

### **Structure of Evidence**

2.16 My evidence will demonstrate that the Council has not had due regard to the importance of ensuring that Harrow meets the needs of its sizeable South Asian and other ethnic communities and the specific requirements of these groups with regards to wedding and other cultural events. In particular, I will show that the Council has not had due regard to the availability of alternative venues that are able to cater for these needs fully.

2.17 I will demonstrate that, as a result of these failures, the Council is failing to comply with its statutory public sector equality duty.

2.18 My proof is structured so as to provide the following evidence:

- The legal, policy and strategy context, focusing on the Council's public sector equality duty and policy relating to planning for social infrastructure (Section 3)
- Key information about the South Asian and ethnic wedding market, including the specific requirements of such events and the market demand for Premier Banqueting (Section 4)
- The demographic profile of the market in which Premier Banqueting operated – the 'sub-regional market area', focusing on relevant characteristics protected under the Equality Act 2010 (Section 5)
- Supply of potential alternative venues within the defined sub-regional market area, and in Harrow specifically as the authority area with the largest concentration of individuals with relevant protected characteristics (Section 6)
- The economic and social benefits associated with the operation of Premier Banqueting in the London Borough of Harrow (Section 7)

2.19 Throughout my evidence I draw on a range of information and research. This includes information provided by the Appellant in relation to the operation of Premier Banqueting, and information I have obtained through my own research, including field research into alternative comparable venues and desk-based evidence relating to the market for South Asian wedding venues. Where appropriate, supporting data is contained within my Proof of Evidence or appended.

2.20 A conclusion is provided at Section 8 of my proof of evidence, and this also stands as my Summary Proof of Evidence.

- 2.21 I conclude that the closure of Premier Banqueting's venue has been disadvantageous to the South Asian and other ethnic communities within the London Borough of Harrow and the wider sub-region, resulting in no appropriate banqueting venue within the Borough to meet their cultural needs for weddings and other life events. This is likely to lead to event hosts having to travel outside of the area to meet their needs. In addition to the negative social impacts I have outlined, the closure of Premier Banqueting also has negative local economic impacts, including loss of trade for businesses supplying Premier Banqueting and the loss of expenditure associated with wedding guests in the local economy.
- 2.22 In conclusion there is a clear social and economic need for reprovision of Premier Banqueting's offer within the London Borough of Harrow.

### 3. Relevant Law, Policies and Strategies

- 3.1 There are various statutory provisions, policies and strategies that are relevant to my evidence in that they relate to equality of opportunity and the provision of social infrastructure to support strong and inclusive communities. These are set out below.

#### **Equality Act 2010**

- 3.2 Under the Act, public authorities are subject to a public sector equality duty (“**PSED**”) and are required to have due regard to the need to, amongst other matters:

*“advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it” (section 149(1)(b));*

- 3.3 This means having regard, in particular, to the need to (section 149(3)):

*“(a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;*

*(b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;*

*(c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.”*

- 3.4 The Act identifies the following as “protected characteristics”: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation (section 4). These are the grounds upon which discrimination is unlawful. Race is defined as encompassing colour, nationality, and ethnic or national origins (section 9(1)).

#### **National Planning Policy Framework (NPPF) (Core Document 1)**

- 3.5 In section 8 of the NPPF entitled ‘Promoting healthy and safe communities’, paragraph 93 the NPPF states:

*“To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

*a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*

*b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*



*c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;*

*d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and*

*e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services."*

## **Greater London**

### **London Plan (2021) (Core Document 2)**

#### **Policy GG1 Building Strong and Inclusive Communities**

3.6 Policy GG1 of the London Plan states that:

*"Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:*

*[...]*

*C provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation*

*[...]*

*and*

*I support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face"*

#### **Policy S1 Developing London's Social Infrastructure**

3.7 Policy S1 of the London Plan states at paragraphs A and C:

*"A When preparing Development Plans, boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.*

*[...]*

- C *Development proposals that provide high-quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.”*

3.8 The commentary supporting Policy S1 adds as follows:

*“Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. [...] There are a wide variety of providers delivering these services, from large state-funded organisations, public and private institutions and specialist providers, to charitable trusts, the voluntary sector, community and faith groups, and individuals. [...]”*  
(para 5.1.1)

*“Social infrastructure plays an important role in developing strong and inclusive communities. It can provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place.”* (para 5.1.2)

## **London Borough of Harrow**

### **Equality of Opportunity Policy (Core Document 9)**

3.9 Pursuant to its PSED, the Council has an Equality of Opportunity Policy which is underpinned by principles and values. It sets its Corporate Equality Objectives in line with these.

3.10 Harrow’s Corporate Equality Objectives include<sup>2</sup>:

*An improved understanding of our communities to ensure services are fair, equitable and accessible to all and reduce inequality*

*Promote and celebrate the diversity of our borough and foster community cohesion*

### **Harrow Core Strategy (February 2012) (Core Document 4)**

3.11 Under the heading ‘Borough Portrait’, the Core Strategy states that:

*The challenge for Harrow is to accommodate further development but in a manner and form that is tailored to meet local needs, provides for future social and economic wellbeing...*

(para 3.1)

3.12 The stated “Core Strategy objectives” include:

*Ensuring that growth is matched by enhancements to social and physical infrastructure, including education, health care, recreation and cultural facilities*

(para 3.18(2), bullet 1)

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<sup>2</sup> [www.harrow.gov.uk/council/Equality-diversity/2](http://www.harrow.gov.uk/council/Equality-diversity/2) accessed 25/08/2022

- 3.13 The “Overarching Policy Objectives” for Core Policy CS1 include (page 24, bullet 5):

*Enhance residents’ access to open space, recreation, health care, education and community facilities<sup>3</sup>*

- 3.14 Core Policy CS1 itself states (section Z):

*[...] The development or expansion of physical or social infrastructure will be permitted where it is needed to serve existing or proposed development, or required to meet projected future requirements. The loss of community facilities will be resisted unless adequate arrangements are in place for their replacement or the enhancement of other facilities.*

**Draft Infrastructure Assessment and Delivery Plan (June 2012)**

- 3.15 This draft plan includes an assessment of the provision of “Community Halls and Cultural Facilities” within the Borough (section 5.10). The document was published in 2012 and is therefore somewhat out of date.

- 3.16 This draft plan does not specifically cover spaces suitable for wedding functions, though the following is noted with reference to cultural facilities:

*It is likely that any new facility will necessarily need to be multifunctional, providing for a range of uses beyond just cultural and arts provision, such as providing for larger functions (e.g. weddings etc) or sports. This work will be undertaken in the context of revising the Harrow Cultural Strategy and will be picked up in any subsequent review of the Delivery Plan.*

(para 5.10.11)

**Draft Cultural Strategy 2018-2021 (Core Document 11)**

- 3.17 This document does not appear to directly reference the need for event space to cater for larger functions such as weddings.

**Harrow Economic Strategy 2021-2030 (Core Document 12)**

- 3.18 Immediate economic challenges are recognised as including business closure and unemployment (page 3). It notes that, nationally, people with Black, Asian and multi-ethnic backgrounds experienced a disproportionate impact in terms of the unemployment that resulted from the Coronavirus pandemic. It is expected that residents of these ethnic groups within Harrow would similarly be disproportionately affected (page 6).

- 3.19 The Strategy sets out mechanisms to address this, including “job brokerage” for those unemployed to work in sectors with immediate needs. Measures of success include a reduction in the unemployment rate (pages 7-8).

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<sup>3</sup> Defined as including leisure and cultural facilities; and community offices and meeting places. See Core Strategy Glossary.

3.20 The strategy includes objectives to support businesses, particularly micro-businesses, to survive and grow. This will be measured by indicators including business births and deaths (survival rates), local supply chain spend and the number of jobs (pages 16-17).

### Summary

3.21 This concise review of relevant law, policy and strategy illustrates that at every level (from national to local) there is an imperative to provide sufficient social and community facilities to meet the needs of those with protected characteristics. Specifically:

- The Equality Act 2010 places a duty on public bodies, when exercising their functions, to have due regard to the need to take steps to meet the needs of those in their community who share a relevant protected characteristic, including race and religion.
- The NPPF requires social and cultural facilities, including those provided by private entities, to be planned for positively including protecting against the loss of facilities which meet a community's needs.
- The London Plan recognises that providers of social infrastructure include private institutions and requires Councils to ensure that diverse needs are met, informed by a needs assessment of social infrastructure. Loss of infrastructure should only be permitted where re-provision is possible.
- Harrow Council sets its own objectives in relation to promoting the diversity of the borough in its Equality of Opportunity Policy. Its Core Strategy includes objectives relating to enhancing residents' access to infrastructure including community facilities. The loss of such facilities will be resisted unless adequate arrangements are in place for alternatives.
- The Council's Economic Strategy includes reducing unemployment, which has disproportionately affected Black, Asian and minority ethnic groups during the pandemic, as well as supporting businesses to survive and grow including through local supply chains.
- The London Borough of Harrow does not appear to have an up-to-date assessment of social infrastructure requirements nor an assessment of need for larger event spaces to cater for weddings.
- On the basis of national and London policy documents, the event space that was operated by Premier Banqueting qualifies as social infrastructure given the important function it served by providing an essential facility for several communities.

## 4. South Asian and Ethnic Wedding Market

- 4.1 In this section I discuss the characteristics and scale of the South Asian and ethnic wedding market. It is this market specifically which Premier Banqueting served and wants to continue to serve. I also use data on the home addresses of customers hosting events at Premier Banqueting to understand the sub-regional market area which the banqueting venue served and which is focused on the London Borough of Harrow.
- 4.2 The information I present shows that there is not only a need for the type of venue and services offered by Premier Banqueting, there is also evidence of a long-standing level of unmet need within the area.

### Specific Requirements of the Market

- 4.3 The South Asian wedding market is worth an estimated £5 billion per annum nationally<sup>4</sup>. This is equivalent to 'just over a third' of the value of the UK's total wedding sector, valued at £14.7 billion<sup>5</sup>. The average cost of an Asian or ethnic wedding is £70,000 to £100,000, with £30,000 being the typical minimum budget, compared to the average cost of a wedding in the UK being £30,000<sup>6</sup>.
- 4.4 South Asian and ethnic events and weddings have specific cultural and religious requirements. These requirements are met both through the bespoke design of buildings and internal spaces and also through the operation of these facilities and the in-house services that they offer.
- 4.5 These events have common characteristics that are related to the protected characteristics of race and religion, including:
- Scale – these tend to be large events, with around 350-500 guests on average, compared to the average size across all UK weddings of 80 guests<sup>7</sup>.
  - Duration – celebrations may span a number of events across different days.

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<sup>4</sup> Source: [Asian Wedding Association \(www.awauk.org/representation\)](http://www.awauk.org/representation)

<sup>5</sup> Source: [What About Weddings \(wedding industry website\) \(whataboutweddings.co.uk/article/asian-wedding-businesses-left-behind-during-pandemic-call-on-government-to-recognise-the-cultural-significance-of-weddings/\)](http://whataboutweddings.co.uk/article/asian-wedding-businesses-left-behind-during-pandemic-call-on-government-to-recognise-the-cultural-significance-of-weddings/)

<sup>6</sup> Source: [Hitched \(wedding planning website\) \(www.hitched.co.uk/wedding-planning/organising-and-planning/what-is-classed-as-a-small-medium-and-large-wedding/#:~:text=By%20hitched.co.uk&text=For%20example%2C%20a%20Hitched%20survey,guests%20for%20a%20large%20wedding\)](http://www.hitched.co.uk/wedding-planning/organising-and-planning/what-is-classed-as-a-small-medium-and-large-wedding/#:~:text=By%20hitched.co.uk&text=For%20example%2C%20a%20Hitched%20survey,guests%20for%20a%20large%20wedding)

<sup>7</sup> Source: [Hitched \(www.hitched.co.uk/wedding-planning/organising-and-planning/what-is-classed-as-a-small-medium-and-large-wedding/#:~:text=By%20hitched.co.uk&text=For%20example%2C%20a%20Hitched%20survey,guests%20for%20a%20large%20wedding\)](http://www.hitched.co.uk/wedding-planning/organising-and-planning/what-is-classed-as-a-small-medium-and-large-wedding/#:~:text=By%20hitched.co.uk&text=For%20example%2C%20a%20Hitched%20survey,guests%20for%20a%20large%20wedding)

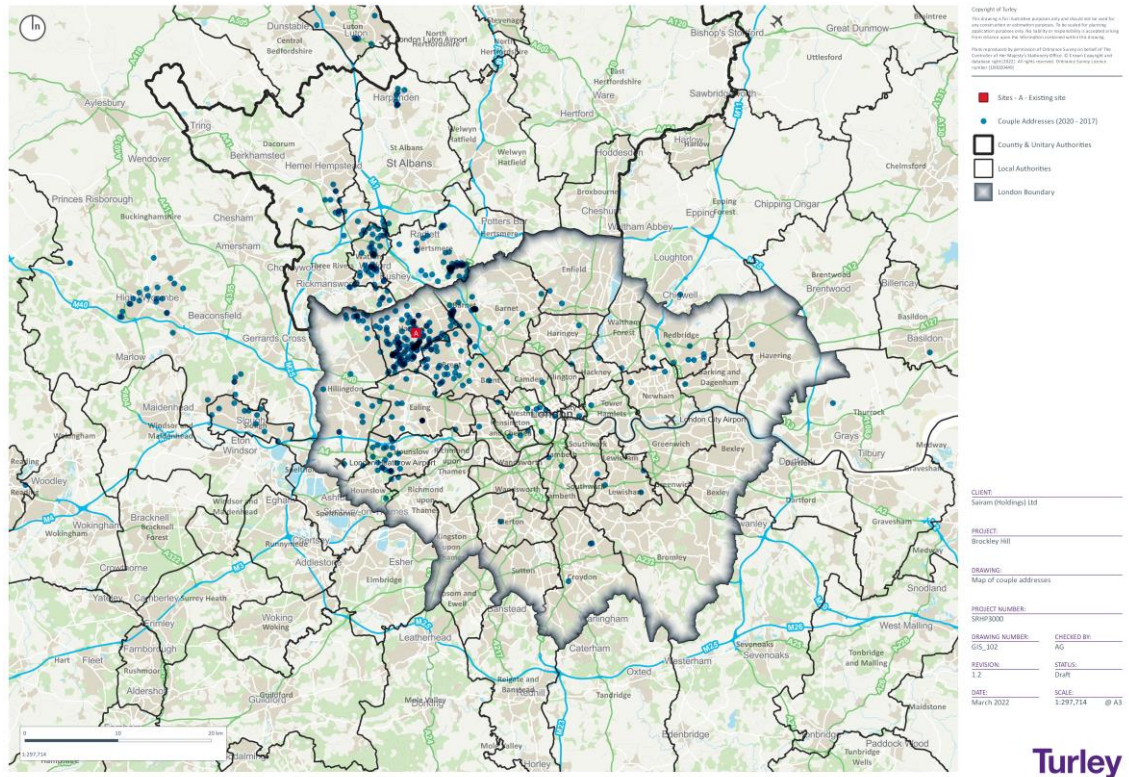
- Customs – specific cultural and religious ceremonies require specific spaces such as elevated ceiling heights to accommodate a stage and mandap (covered structure with pillars) as well as specific décor.
  - Religion – some faiths require gender segregation for some elements of a ceremony or celebration.
  - Catering – requirements for the handling of specific food and beverages which may include the consumption of specific food types (for example Halal) or exclusion of others (such as alcohol and meat).
- 4.6 Further information on the range of ceremony types and supporting events is included in the Glossary of Turley’s ‘Needs Case’ paper which accompanies the Statement of Case (Appendix 1).
- 4.7 The main protected characteristics of those holding South Asian and ethnic events and weddings are their race and/or religion, specifically:
- South Asian ethnicity, especially members of the Pakistani and Indian ethnic groups
  - Members of some other ethnic communities including African (in particular, Somalian), Afghani and Arabic communities
  - Hindu faith
  - Muslim faith
  - Sikh faith
- 4.8 In Section 5 below, I discuss the protected characteristics of Premier Banqueting’s customers in more detail.
- 4.9 Weddings are more than just parties and for many in the South Asian community the societal and cultural element is considered a rite of passage of significant religious importance.

## **Market Demand for Premier Banqueting**

### ***Market Geography***

- 4.10 Customer data has been supplied by the Appellant for Premier Banqueting for four years of operation from 2017 to 2020 inclusive. See Appendix 1, Map 1 and re-provided below (Figure 4.1).
- 4.11 This data demonstrates that over half of customers (59%) originate from the local authority areas of Harrow, Watford, Hertsmere, Barnet and Brent. This indicates a sub-regional market area for demand and supply of banqueting facilities.
- 4.12 The single highest concentration of customers are from within the Borough of Harrow itself (comprising 29% of customers).

**Figure 4.1: Location of couples/families who have enquired/planned functions at the Premier Banqueting venue between 2017 and 2020**



Source: Premier Banqueting Ltd.

### Scale of Market Demand

4.13 Facts about Premier Banqueting when it was operational, alongside information about the enquiries it received about events, provides an indication of the scale of market demand.

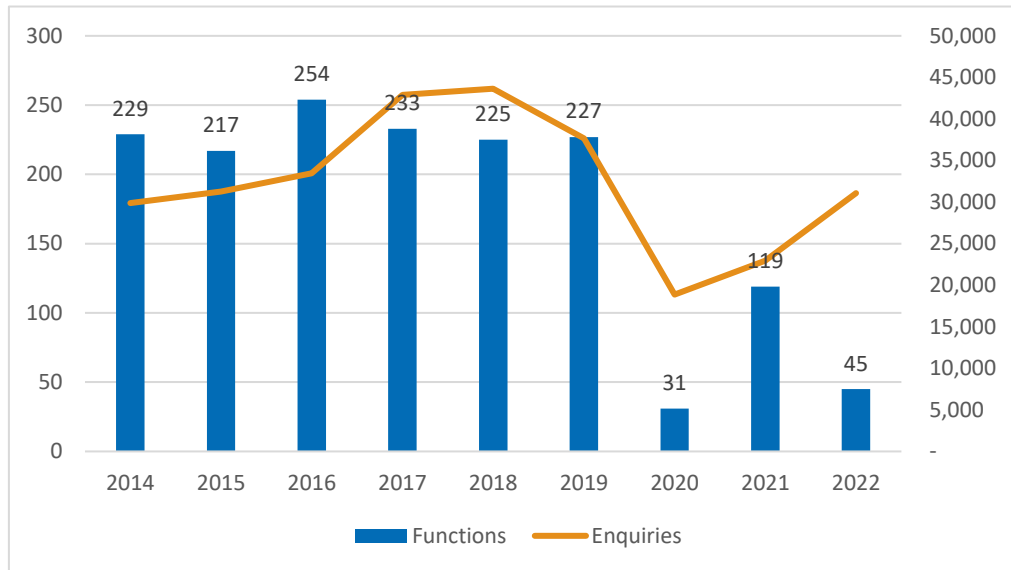
4.14 In terms of the operation of the venue:

- Premier Banqueting was open for business every day of the year prior to its closure in April 2022.
- Between 2014 and April 2022 over 1,500 functions were held at the venue. Of these, 1,387 were held pre-pandemic.
- The pre-pandemic average number of functions was 231 per annum based on the years 2014 to 2019.

4.15 This information tells us that Premier Banqueting had a strong customer market and was a highly used venue.

4.16 The volume of enquiries received by Premier Banqueting illustrates the scale of the wider market. This is shown in Appendix 1, Figure 4 and re-provided below (Figure 4.2).

**Figure 4.2: Number of functions that occurred at Premier Banqueting and number of enquiries between 2014 and 2022**



Source: Premier Banqueting Ltd.

- 4.17 The number of enquiries Premier Banqueting received each year far surpassed the number of functions the venue could accommodate. Even allowing for the possibility that the venue would not have been suitable for some of those making enquiries (for example, too small), or that the potential customer chose to hold their event elsewhere, the data still indicates that there is latent unmet demand because Premier Banqueting was unable to host an event due to already being booked on the requested date.
- 4.18 There was therefore both (i) a met need and (ii) an unmet need that Premier Banqueting could not accommodate during the years of operating its venue. I set out some of the implications of unmet need in Section 6 below.

**Summary**

- 4.19 The South Asian and ethnic wedding market has specific requirements which translate into a need for specifically configured event spaces (in terms of size, capacity and ceiling height, for example). Venues and staff must also take account of cultural requirements and sensitivities (such as the need in some communities for gender-segregated guests and staff, or specific food service arrangements).
- 4.20 Analysis of customer data shows that the market geography which Premier Banqueting serves is concentrated in the London Borough of Harrow but also encompasses a larger sub-regional market area. Demand from this market area is strong as illustrated by the high usage rates of Premier Banqueting’s venue during its operation and the volume of enquires received annually which were consistently in excess of the number of events it was able to host.
- 4.21 This demonstrate both a met need as well as an unmet need in the local area of Harrow and the wider sub-regional market area.



## 5. Protected Characteristics of Premier Banqueting's Market

5.1 In this section I discuss the importance of Harrow as home to communities with specific protected characteristics. The concentration of South Asian and other ethnic groups resident in the borough and the sub-regional market area means that there is a strong market for the services provided by Premier Banqueting.

### **Ethnicity and Religion**

5.2 The London Borough of Harrow is immensely diverse and multicultural, with high concentrations of residents with protected characteristics in relation to race and religion.

5.3 At the time of the 2011 Census, over half (57.7%) of the population belonged to Black and Minority Ethnic communities, compared to 40.2% within London. The representation of those who are members of Asian and Asian British ethnic groups is particularly strong, with over two-fifths (42.6%) of those living in the Borough identifying as belonging to these groups. This compares to 18.5% across London.

5.4 When this headline figure is further broken down by ethnicity, the dominant group is Indian (34.3%). The category 'other ethnic group' (17.2%) also has above average representation<sup>8</sup>.

5.5 Further detailed data by geography is provided within Table 1 of the Needs Case paper (Appendix 1).

5.6 With regards to religion, one in four (25.3%) residents of Harrow identifies as Hindu, which is substantially higher than the equivalent percentage for London as a whole (5.0%). More than one in ten residents identify as Muslim (12.5%) which is broadly comparable to the London level (12.4%) and much greater than across England as a whole (5%)<sup>9</sup>.

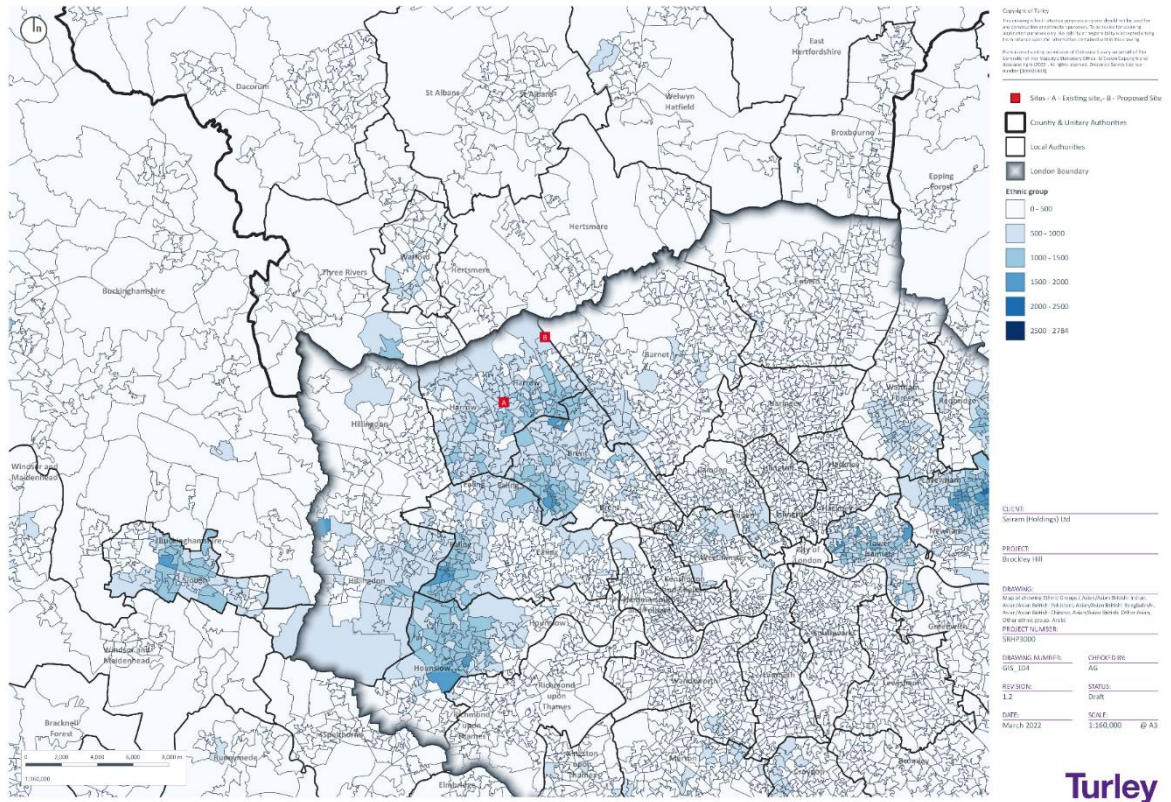
5.7 Mapping this data (see Appendix 1, Maps 3 and 5 and re-provided below as Figures 5.1 and 5.2 respectively) at a finer geographic level shows that there are large concentrations of persons with these protected characteristics relating to race and religion in the London Boroughs of Harrow and Brent. Similar but geographically separate clusters exist to the west of London and to the east of London.

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<sup>8</sup> Annual Population Survey (2021) Ethnicity by Age

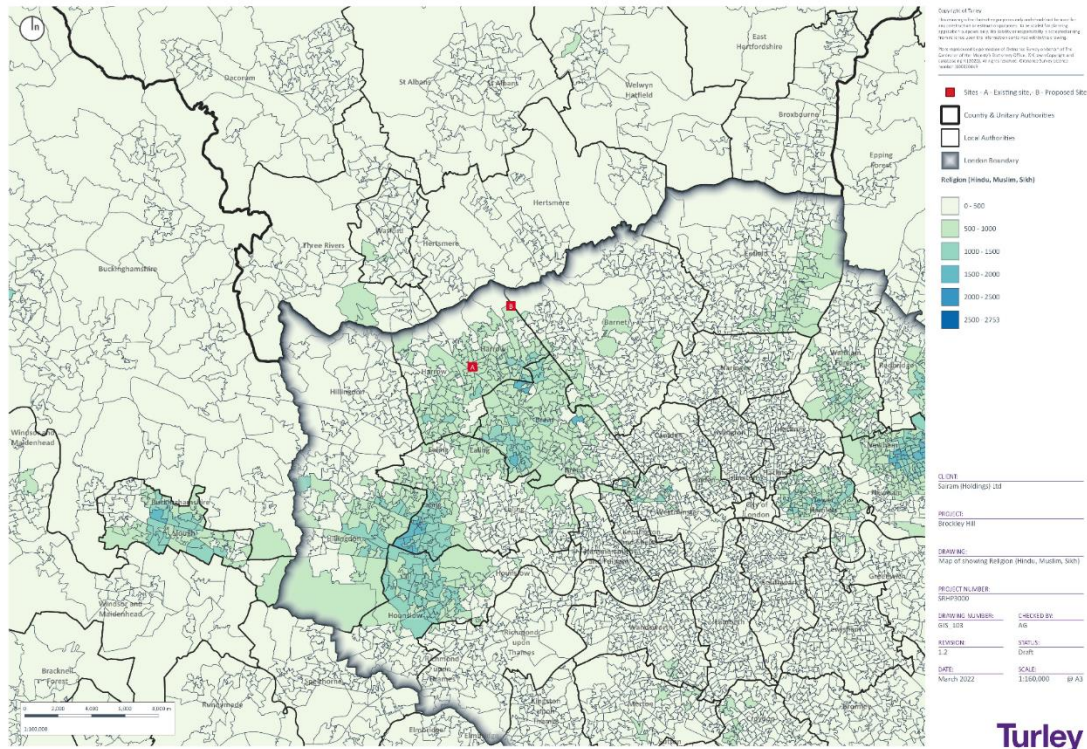
<sup>9</sup> Census 2011

**Figure 5.1: Distribution of Asian/Asian British ethnic groups in North West London (by Census Lower Super Output Area LSOA)**



Source: Census 2011

**Figure 5.2: Distribution of people with religious beliefs identified as Hindu, Muslim or Sikh (by Census Lower Super Output Area LSOA)**



Source: Census 2011

### Propensity for Marriage

5.8 Harrow has an above average representation of married individuals (54% compared to 48% across the sub-region and 40% in London as a whole).

5.9 When this data is viewed by ethnicity and religion at a household level it demonstrates a higher propensity for marriage amongst those with the following protected characteristics when compared with other ethnic groups<sup>10</sup>:

- 53.8% of Indian, Pakistani and Bangladeshi households in Harrow are married;
- 53.9% of Hindu, Muslim and Sikh households in Harrow are married; and,
- This compares to a lower rate (39.6%) of all households in the Borough being married.

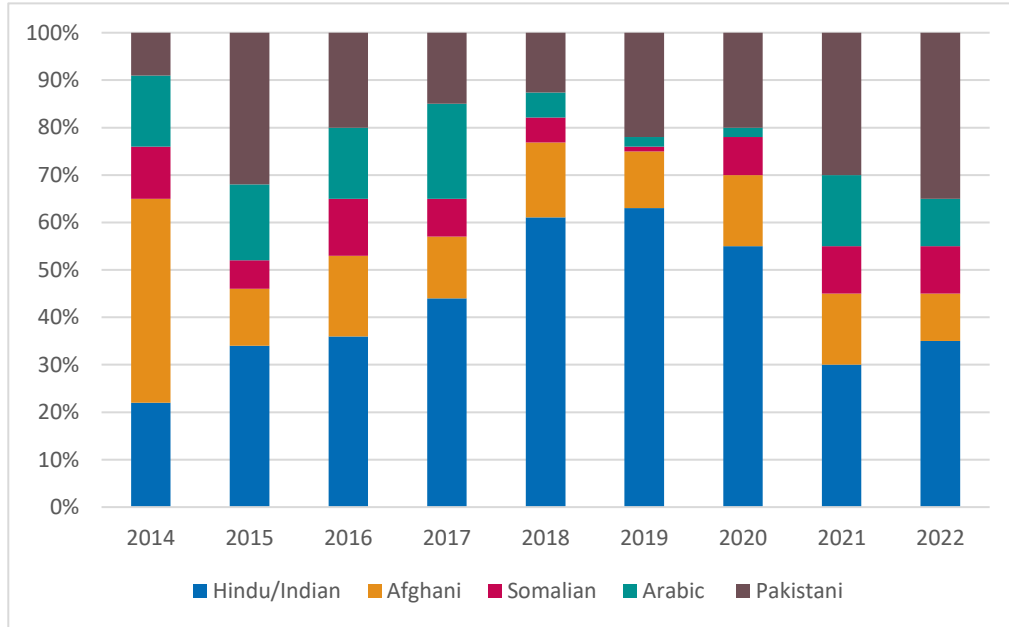
### Protected Characteristics of Premier Banqueting's Customers

5.10 The Appellant has provided the ethnicities of hosts of events at Premier Banqueting from 2014 to 2022. The dominant ethnicities were Indian and Pakistani (see Appendix

<sup>10</sup> Census (2011) Household composition by ethnic group; Census (2011) Household composition by religion. This data is only available at household level.

1, Figure 6 and re-provided below as Figure 5.3). The venue also catered for events held by Afghani, Somalian and Arabic hosts.

**Figure 5.3: Ethnicity of hosts of Functions at Premier Banqueting between 2014 and 2022**



Source: Premier Banqueting Ltd.

- 5.11 A key part of Premier Banqueting’s proposition in the market was its knowledge and understanding of the different cultural and religious requirements of these ethnic communities. These include the specific dietary requirements and cultural requirements discussed in Section 4 above, including the need for segregation between male and female guests for specific religious events.
- 5.12 The facilities and services provided by Premier Banqueting were specifically designed to meet these diverse requirements, enabling it to offer a very particular proposition to the market at an affordable price.
- 5.13 This is corroborated by case studies compiled about ten hosts who held events at Premier Banqueting (see Appendix 3).

**Summary**

- 5.14 The sub-regional market area which Premier Banqueting serves has a high representation of people and communities with protected characteristics relating to race and religion. This is particularly true of the London Borough of Harrow.
- 5.15 Customer evidence confirms that virtually all those hosting events at Premier Banqueting’s venue between 2014 and 2022 exhibited one or more protected characteristics.

5.16 In meeting a need for events for its customers and the sub-regional market area, Premier Banqueting catered for the different cultural and religious requirements of these communities.

## 6. Alternative Comparable Venues

6.1 In this section I set out the typical requirements of those who enquired about hosting an event at Premier Banqueting. Following this, I review potential alternative venues within the sub-regional market area and conclude that there is a lack of alternative comparable venues that are able to cater for the specific requirements of the South Asian and ethnic communities. The closure of Premier Banqueting will only serve to exacerbate the level of unmet need within the area.

### Venue Choices of Enquiring Hosts

6.2 In order to gather data about customer needs and requirements a web-based survey of individuals who made enquiries with Premier Banqueting but ultimately held their event elsewhere was undertaken. The survey was sent to 300 contacts in April 2022. A total of 113 responses were received.

6.3 The purpose of the survey was to identify the alternative venues used and the key features that were sought in a venue. The survey also asked respondents to identify their preferred location when they were making enquiries about events, so that this data could be compared with data about where events were ultimately held.

6.4 Further details of the findings from the survey are contained in Appendix 1 (para 43-50), with a table of the findings contained in Appendix 2, and are summarised below.

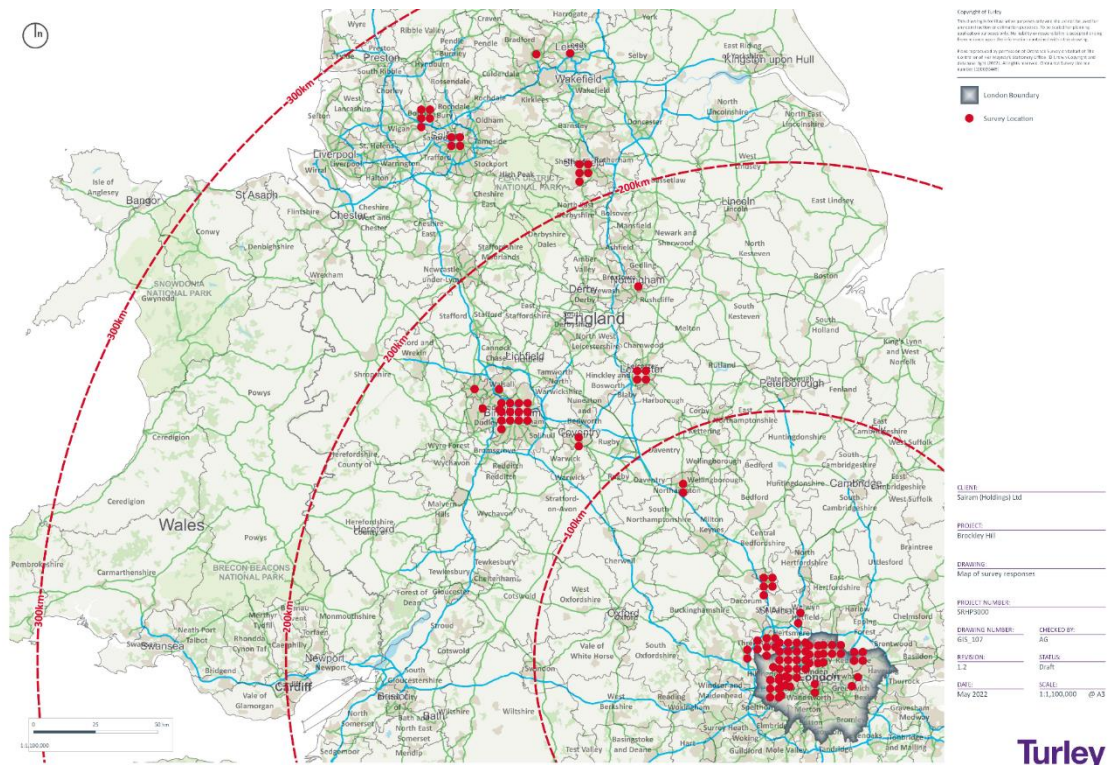
### Location

6.5 The key findings from the survey in terms of location were as follows:

- The borough of Harrow was stated as the location of preference of the majority (84% or 95 responses).
- Of the respondents who held their event in Harrow (15) all were held at the VIP Lounge in Edgware which is now closed.
- A total of 12 respondents held their events elsewhere in the sub-regional market area. All were held at venues identified in our alternative venues search: Cavendish Banqueting Suite, Ariana Banqueting Hall, and Langley Banqueting and Conference Centre.
- 38 events were held elsewhere in London.
- A large number (40) held their event between 100km and 300km from their preferred location of Harrow. Locations included Birmingham, Bolton, Manchester and Sheffield.

6.6 Map 8 of Appendix 1 is re-provided below (Figure 6.1) and shows the location of events being held.

**Figure 6.1: Venues Used by Survey Respondents**



Source: Survey responses as of 3 May 2022, Turley Economics (2022)

### Preferred Features

6.7 The survey included a question on the reasons for considering Premier Banqueting as a potential venue. The key findings were these:

- Price, size and location were the main reasons for considering Premier Banqueting. These represented between 74% and 77% of survey responses.
- Services provided (44%) and proximity to family and friends (26%) were also considered important.
- Proximity to place of worship (7%) was considered less important though still a reason for some respondents in considering the venue.

6.8 These findings are corroborated by the ten case studies of hosts holding events at Premier Banqueting. Particular reasons for choosing Premier Banqueting included:

- Location
  - Proximity to family and friends
  - Wanting to get married close to home
- Venue offer
  - Attending a previous event there or word of mouth

- The services and price
  - Lack of alternative venues
- 6.9 The case studies indicate that the majority of hosts (8 out of 10) would have preferred to wait for an available date had Premier Banqueting not been available (see Appendix 3).

## Alternative Venues in Sub-Regional Market Area

### Approach

6.10 I used the following approach to identify alternative venues in the sub-regional market area:

- As explained above, I considered a web-survey of those who had made enquiries of Premier Banqueting to identify their key requirements for a venue.
- I undertook an internet search to identify potential alternative venues in the sub-regional market area (as a geography reflecting Premier Banqueting’s customer base);
- I assessed the identified potential venues against the stated requirements of customers, drawing on the survey findings detailed above as well as my understanding of the requirements for events held by the South Asian and other ethnic communities:
  - Capacity - 300 guest capacity minimum.
  - Ability to accommodate a stage/mandap for Hindu ceremonies.
  - Understanding of and ability to cater for cultural sensitivities such as gender segregation.
  - Catering and food service – on-site catering<sup>11</sup> and ability to cater for specific dietary requirements, including vegetarian and Halal.
  - Providing a package of services to enable a variety of price points<sup>12</sup>.
- I undertook further internet searches and made telephone calls to all identified venues to compile the above information.
- I then verified my findings by visiting the exterior of the venues in person<sup>13</sup>.

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<sup>11</sup> “Dry hire” venues were included but were not given the top rating within the assessment given these provide a different offer, particularly where kitchen facilities are not available within a venue.

<sup>12</sup> It was not possible to compile information on pricing as this depends on a range of choices made by the hosts.

<sup>13</sup> I did not visit the VIP Lounge as this has permanently closed. Nor did I visit Oakington Manor Primary School or Mostyn Suite Sattavis Patidar Centre as my initial desk-based research led me to conclude that these two venues would not meet the needs of South Asian and other ethnic minorities.



6.11 Details of the venues considered are contained within Appendix A of Appendix 1. Following preparation of Appendix 1 which was submitted with the Statement of Case in May 2022, the venue at Holiday Inn, Wembley has closed.

6.12 A crib sheet for each venue visited is contained in Appendix 4.

### Findings

6.13 I set out here the key findings of the above process:

- There were a total of 30 potential venues across the sub-regional market area, which includes Harrow. These 30 venues formed the starting point for my shortlisting based on the criteria set out above.
- The initial sifting exercise, using a minimum capacity threshold of 300 guests, removed 10 of the identified venues on this measure alone (leaving 20 venues for further analysis).
- The review of the shortlisted 20 venues against the specific criteria for South Asian and ethnic weddings identified that there are no comparable alternative venues in the London Borough of Harrow, leaving a significant gap in the market since the closure of Premier Banqueting.
- Across the sub-regional market area, my initial desk-based research submitted with the Statement of Case (see Appendix 1) identified that:
  - 7 venues positively meet these requirements (i.e. they are geared towards catering for South Asian and ethnic weddings). These are shown in Map 7 in Appendix 1.
  - 9 venues largely meet these requirements (i.e. they are able to cater for some South Asian and ethnic weddings but stricter cultural or religious requirements may not be fully met or on site catering may not be available).
  - 2 do not appear to meet these requirements (i.e. they would not be able to adequately cater for South Asian and ethnic weddings).
  - 2 venues appear to meet these requirements but have recently closed including VIP Lounge<sup>14</sup> in Harrow (permanent closure) and Watford Colosseum in Watford<sup>15</sup> (temporary closure for refurbishment).

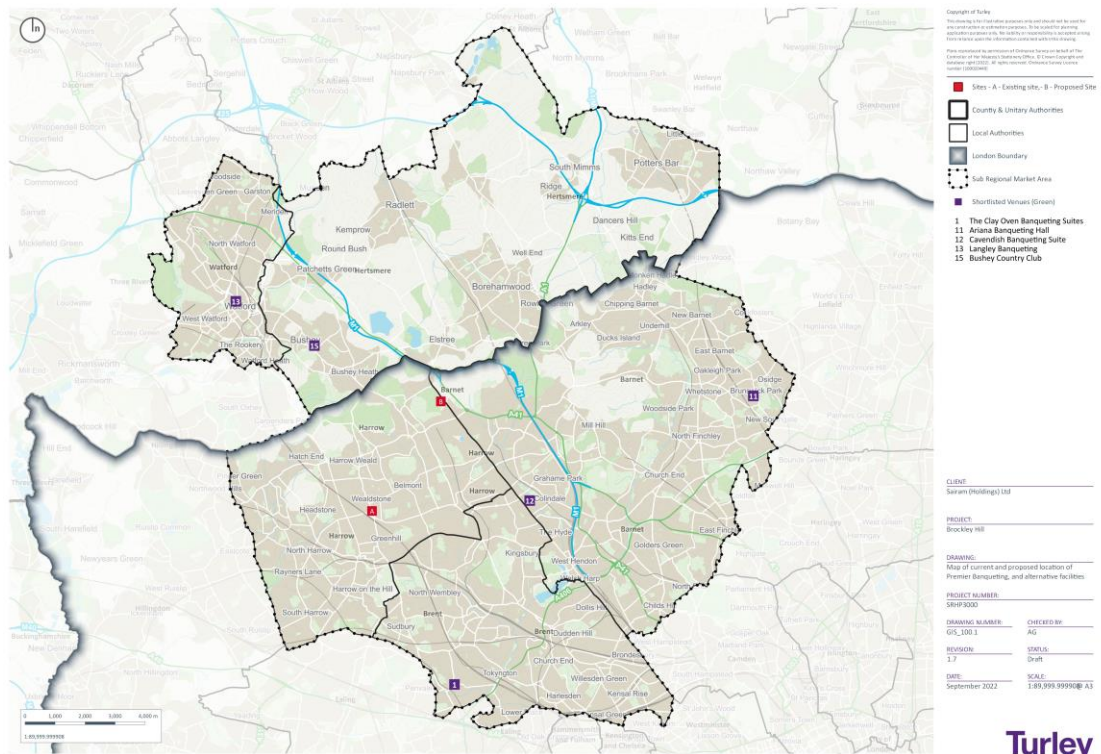
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<sup>14</sup> VIP Lounge, which has many of the same characteristics as Premier Banqueting, is no longer operational at its Edgware site in the London Borough of Harrow. Its closure means there are no comparable venues operating in the borough.

<sup>15</sup> Information on the website for Watford Colosseum states that it is currently closed as Watford Borough Council plans to undertake a major refurbishment and improvement programme of the venue ahead of reopening to the public. This was verified by a site visit. Other information suggests it is geared to South Asian weddings but we have not included it within our numbers or analysis due to lack of capacity information and uncertainty of its continued use for this purpose.

- 6.14 Further information on the 30 venues can be found in Appendix 1.
- 6.15 Following the completion of my desk-based research, I undertook further research by visiting the exterior of sites in person and then reviewing my previous conclusions. This on-the-ground research led me to change my assessment as follows:
- There remain no comparable alternative venues in London Borough of Harrow.
  - 5 venues across the sub regional market area positively meet the requirements (i.e. they are geared towards catering for South Asian and ethnic weddings). These are shown in Figure 6.2. This revision follows (i) the closure of Holiday Inn, Wembley; and (ii) my reappraisal of New Hertford Suite at Hilton London, Watford as a venue at which stricter cultural and religious requirements may not be fully met. It is also important to note that Bushey Country Club is on a short term lease to the wedding operators while the Hertsmere Council considers its longer term future and so it may not be available as a wedding venue in the near future.
  - 10 venues largely meet these requirements (i.e. they are able to cater for some South Asian and ethnic weddings, but stricter cultural or religious requirements may not be fully met, or on-site catering may not be available). This now includes the New Hertford Suite at Hilton London (see previous bullet point) and Sattavis Patidar Centre (previously considered not to meet requirements) following my reassessment of its ability to provide a stage while accommodating 300+ guests. I have reassessed The Manor, Elstree as not able to adequately cater for South Asian and ethnic weddings and therefore this venue is now in the category below.
  - 2 do not appear to meet these requirements (i.e. they would not be able to cater adequately for South Asian and ethnic weddings). This follows my reassessment as follows:
    - The reallocation of the Sattavis Patidar Centre to the preceding category above based on my reassessment of its ability to provide a stage while accommodating 300+ guests.
    - The inclusion of The Manor, Elstree within this category given it only firmly meets the capacity requirement.
  - 3 venues appear to meet these requirements but have recently closed: VIP Lounge in Harrow (permanent closure); Holiday Inn in Wembley (permanent closure); and Watford Colosseum in Watford (temporary closure for refurbishment).

**Figure 6.2: Venues Within Sub Regional Market Area Positively Meeting Requirements**



Source: Turley (2022)

## Summary

- 6.16 A review of venues using the criteria above identified that there are no comparable alternative venues in the London Borough of Harrow that are able to cater for the range of cultural and religious requirements that were met by Premier Banqueting.
- 6.17 With the closure of Premier Banqueting this leaves a significant gap in market supply in the area of most concentrated need within the sub-regional market area.
- 6.18 This is in the context of a close comparable in Harrow, VIP Lounge, also closing recently. The closure of Premier Banqueting means that there is now no venue of this type to host South Asian and other ethnic weddings within the Borough and support these important life events for Harrow's South Asian, Hindu, Muslim and Sikh communities.
- 6.19 Across the sub-regional market area of five authorities only 5 venues meet the requirements for South Asian and ethnic weddings.
- 6.20 The locations chosen for events that Premier Banqueting could not accommodate show that there is significant unmet need within the London Borough of Harrow and arguably within the sub-regional market area.

- 6.21 This is particularly stark given the majority (84%) of survey respondents cited a Harrow location as their preference and yet only 15 (13%) ultimately held their event in the Borough.
- 6.22 It is telling that all 15 were held at the VIP Lounge which is now closed. With the recent closure of the VIP Lounge and the subsequent closure of Premier Banqueting this unmet need will have increased significantly.
- 6.23 With price, size and location being the most important features for many of those surveyed and that 40 (35%) of respondents ultimately held their events between 100km and 300km away it is evident that there is insufficient provision of an appropriate nature within London Borough of Harrow and the sub-regional market area.

## 7. Economic and Social Benefits of Premier Banqueting

- 7.1 In this section I set out some of the ways in which Premier Banqueting generates economic and social benefits for the economy local to Harrow.
- 7.2 The operation of Premier Banqueting brings a range of economic and social benefits to those it employs and through its supply chains, many of its suppliers being local to Harrow.
- 7.3 Appendix 8 provides further detail and methodology with regards to the economic impact analysis and modelling.

### **Employment and Staffing**

- 7.4 During its operation, Premier Banqueting employed 18 staff on a full time, permanent basis. This included the management team, receptionists, floor staff (looking after the venue and events) and kitchen staff.
- 7.5 All permanent staff were of South Asian ethnicity and 12 lived in London Borough of Harrow.

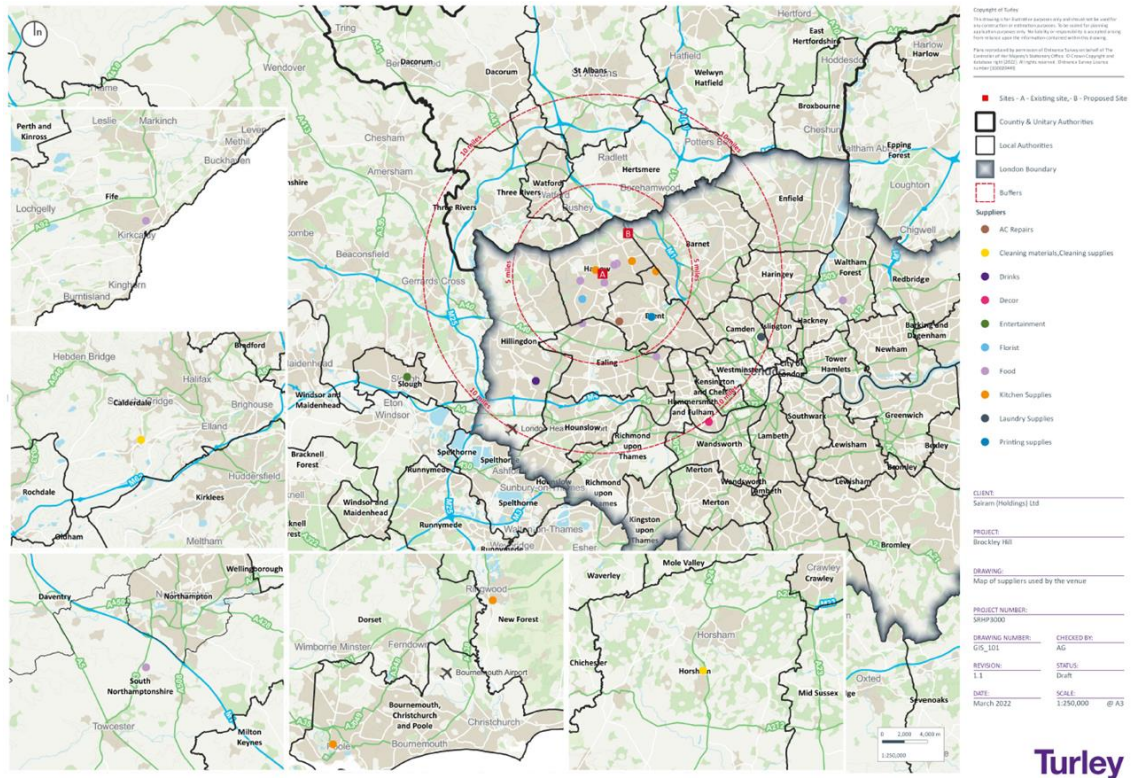
### **Supply Chains**

- 7.6 Premier Banqueting had 25 main suppliers<sup>16</sup>. Of these, 8 are based in Harrow and a further 10 elsewhere in London. The businesses provide a range of services including entertainment, food and beverages, security and photography.
- 7.7 Map 10 of Appendix 1 (re-provided below as Figure 7.1) shows the location of the business' suppliers.

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<sup>16</sup> Information provided by Appellant

**Figure 7.1: Location of Premier Banqueting Suppliers**



Source: Premier Banqueting Ltd.

7.8 A survey of Premier Banqueting’s suppliers conducted in August 2022 yielded responses from 10 of its 25 suppliers (40%) and indicated that:

- Supply chains support employment. Respondents to the survey employed between 3 and 100 staff, with a combined total of c.320 employees.
- Supply chain businesses and therefore their employees are concentrated in Harrow. Of the 320 jobs in supply chain businesses surveyed, c.200 jobs relate to businesses based in London Borough of Harrow.
- The ethnic profile of employees within these businesses is dominated by staff of a South Asian or other ethnic background. Eight of the 10 survey respondents report that all of their staff are of South Asian or other ethnic background.
- These organisations rely heavily on the Asian and ethnic market as well as Harrow for their business. Premier Banqueting supported an estimated £1,715,000 of revenue to these businesses each year.
- As a result, the businesses report that the closure of Premier Banqueting will have a ‘considerable impact’ on their operation (8 of the 10 businesses who responded). Two businesses specifically reported that they are now facing closure due to the loss of the venue. Both businesses are micro businesses with under 10 staff and are based in the Borough.

- Given the nature of the employment profile of these supply chain businesses, with a dominance of staff of a South Asian or other ethnic background, those with these protected characteristics will be disproportionately affected through the closure of Premier Banqueting.

7.9 A breakdown of the survey responses is contained in Appendix 5. Further analysis of the supplier survey is contained within the economic impact appendix (Appendix 8).

7.10 While the closure of Premier Banqueting has had a direct negative impact on its supply chain businesses, there will be a commensurate positive impact in terms of wider supply chain benefit should Premier Banqueting be able to continue to operate.

### **Guest Spend**

7.11 Guests attending events will spend within the local economy as part of their visit, for example on accommodation and transport.

7.12 A survey of 234 guests attending events held at Premier Banqueting between 25 March 2022 and 2 April 2022 indicated that:

- Of guests who did not live in London, around two-thirds chose to stay overnight. This was particularly evident within those who had travelled further to attend the event, from locations such as Birmingham and Bradford. Those living in relative proximity, for example in Hertfordshire and Bedfordshire as well as those in London, did not stay overnight.
- Around 14% of guests arrived by taxi or Uber, further generating benefits within the local economy.

7.13 Data published by Visit Britain and the International Passenger Survey (Office for National Statistics) indicates that those travelling longer distances to visit friends and relatives typically spend more on these trips. This is true both within the UK (with those visiting London from Scotland spending the most) and internationally.

7.14 The average spend per night for a UK-based visitor to Harrow who is visiting friends and family is £15 while this rises to £98 and £100 for visitors to London from India and Pakistan respectively. For a day visitor to a special event such as a wedding the average spend is £17.

7.15 A wedding at Premier Banqueting with 300 guests will therefore generate an estimated £5,060 per event based on 82% being day visitors and 18% staying overnight, not factoring in international guests or stays longer than one night. This is scaled up to £1,200,000 per year based on the average number of events held.

7.16 Further information is contained within Appendix 7 – Guest Spend Briefing Note and Appendix 8 – Economic Impact Briefing Note.

### **Business Rates**

7.17 Premier Banqueting is estimated to generate annual business rate payments of £66,000 based on the floorspace of the proposed development. This is calculated using the per sqm rateable value of the property previously occupied by Premier

Banqueting<sup>17</sup> as set out in Appendix 8. This represents a £4,000 uplift from the previous operation. Therefore, over a ten-year period, the proposed development is expected to generate circa £660,000 in business rates which will contribute to funding services within the local authority.

## Summary

- 7.18 The operation of a venue for Premier Banqueting will generate a range of benefits for the local economy of Harrow including employment, supporting the ongoing operation of supply chain businesses, generating guest spend at local businesses and business rate generation.
- 7.19 Given the nature of Premier Banqueting's business, it supports significant numbers of those with protected characteristics in relation to race. This is evidenced by the ethnic profile of suppliers, employees and guests.

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<sup>17</sup> Tax Service (2022) Business Rates Valuation. 1, Canning Road, Harrow, Middx, HA3 7TS  
([www.tax.service.gov.uk/business-rates-find/valuations/8714115000?valuationId=18107249000](http://www.tax.service.gov.uk/business-rates-find/valuations/8714115000?valuationId=18107249000))



## 8. Conclusion and Summary

- 8.1 In the final section of my proof of evidence I draw conclusions on the need for and importance of the ongoing operation of Premier Banqueting in Harrow, summarising evidence from the previous sections under a number of headings. This section also stands as my summary proof of evidence.

### **Irrefutable Evidence of Market Demand**

- 8.2 Premier Banqueting's customer base is primarily driven by demand from five local authority areas (Harrow, Hertsmere, Watford, Brent and Barnet) forming a 'sub-regional market area'.
- 8.3 The London Borough of Harrow is highly diverse and multicultural. A large proportion of its population identify themselves as Asian or Asian British and one in three are of Indian descent. These are residents with protected characteristics as defined in the Equality Act 2010. Residents of the borough also have a higher propensity for marriage than in other areas of London.
- 8.4 The venue operated by Premier Banqueting specifically catered for the wedding and event needs of these communities and residents. The venue was a key element of social infrastructure in meeting these needs.
- 8.5 The scale of enquiries received by Premier Banqueting far surpassed the number of events that it could hold in any one year. The banqueting venue was open every day of the year and held an average of 231 events each year between 2014 and 2019 in pre-Covid conditions. This demonstrates a high level of demand for this element of social infrastructure and a high level of unmet need in the enquiries which could not be satisfied.

### **Lack of Comparable Alternatives within the Borough**

- 8.6 South Asian and ethnic communities have specific cultural and religious requirements when hosting weddings and other events. Honouring these requirements is fundamental to these communities in choosing an appropriate venue.
- 8.7 I undertook a review of venues capable of meeting these requirements in the sub-regional market area. This included internet research through which I identified a long list of 30 potential venues. I then applied venue criteria specific to the South Asian and other ethnic market, including: capacity (this alone ruled out 10 venues); ability to accommodate a mandap and stage for Hindu ceremonies; understanding of and ability to accommodate specific cultural sensitivities such as gender-segregated events; catering for dietary requirements such as Halal and vegetarian; and providing a package of price-differentiated services.
- 8.8 My analysis of these 30 venues identified that there is currently no comparable venue in the London Borough of Harrow. This follows the recent closure of VIP Lounge. This is important given that our survey of those making enquiries at Premier Banqueting indicated that Harrow was their location of preference.

- 8.9 The closure of Premier Banqueting will therefore significantly increase the unmet need for such a venue in the borough, particularly noting the high concentration of market demand and people with protected characteristics living within Harrow.
- 8.10 Across the wider sub-regional market area of five authority areas, I identified only 5 venues capable of fully meeting the needs of those groups with the protected characteristics. Of those which did not fully meet the criteria: 10 largely met the requirements but would not be able to cater for stricter cultural or religious requirements; 2 did not appear to meet the requirements and would not be able to adequately cater for South Asian and ethnic weddings; and 3 venues were closed (VIP Lounge in Harrow is closed permanently; Holiday Inn, Wembley has recently closed; and Watford Colosseum in Watford is closed temporarily for refurbishment).
- 8.11 It is telling that the survey of those who made enquiries of Premier Banqueting but ultimately held their event elsewhere indicated that one third (35%) held their event outside of both the sub-region and London, in venues located up to 300km away. This was despite 84% of those surveyed reporting Harrow as their location of preference.
- 8.12 This demonstrates a lack of choice and a significant scale of need which is unmet. The closure of Premier Banqueting will further exacerbate this need position.

### **Delivering Additional Economic and Social Benefits to Harrow and the South Asian Business Community**

- 8.13 Premier Banqueting's operations contributed positively to the local economy of Harrow. This included 18 direct jobs supported by its operation as well as over 200 employees within supply chain businesses based in Harrow. Amongst both direct employees as well as those within its supply chain there is a high representation of those of South Asian or other ethnic background.
- 8.14 The closure of Premier Banqueting's venue has had a considerable impact on its supply chain businesses with some smaller businesses indicating that they will go out of business due to loss of trade.

### **Fundamental Role in Supporting Equality of Opportunity**

- 8.15 Premier Banqueting therefore provided an essential element of community and social infrastructure, meeting the needs of residents with the protected characteristics of race and religion within the London Borough of Harrow and the sub-regional market area. This essential social infrastructure, supporting key life events within the community of Harrow and the sub-region, is not provided in a comparable way elsewhere in the Borough.
- 8.16 As well as serving this function, Premier Banqueting supported a supply chain of 8 businesses in Harrow employing upwards of 200 people with a strong representation of these protected characteristics within their workforce. Of these companies almost all have been negatively affected by its closure due to their reliance on its repeat business, with half of those surveyed serving over 150 events at the venue a year.

- 8.17 The South Asian and ethnic communities of Harrow and the sub-regional market area are therefore disproportionately affected by the closure of Premier Banqueting.
- 8.18 Harrow Council denies that there is an unmet need for such provision within the Borough, but to date has not provided any evidence to substantiate that assertion. No such evidence was identified by the Council when the planning application for the proposed development was determined. Nor was any such evidence identified in the Council's statement of case.
- 8.19 In this regard, I do not consider that the Council has demonstrated compliance with its public sector equality duty under the Equality Act 2010, specifically its duty to have due regard to the need to advance equality of opportunity for its residents when exercising its planning and other functions.

### **Conclusion**

- 8.20 In my professional opinion the development of new facilities for Premier Banqueting within the London Borough of Harrow will ensure that the Council is taking the necessary action to support some of the major life events of those who are members of its South Asian and ethnic communities.
- 8.21 The Borough has a concentration of South Asian and ethnic communities that is significant in comparison to London and national averages. By hosting weddings and other events for these communities, Premier Banqueting supported Asian and ethnic supply chain businesses within the community securing a range of economic and employment benefits locally.
- 8.22 Ensuring the business' ongoing operation is therefore irrefutably supporting equality of opportunity for members of these communities who live within the London Borough of Harrow.

**Appendix 1: Statement of Case – Assessment of Need (Core Document 83)**

## **Appendix 2: Survey of Enquiring Hosts**

## **Appendix 3: Couples Case Studies**

## **Appendix 4: Alternative Venue Crib Sheets**

## **Appendix 5: Supplier Survey**



## **Appendix 6: Guest Spend Survey**

## **Appendix 7: Guest Spend Briefing Note**

## **Appendix 8: Economic Impact Briefing Note**

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