

APPEAL REFERENCE: APP/F5540/X/25/3365277

**IN THE MATTER OF AN APPEAL PURSUANT TO SECTION 195 OF THE TOWN AND
COUNTRY PLANNING ACT 1990 CONCERNING:**

**The Firs Lodge, 289 – 291 Bath Road,
Hounslow TW3 3DB**

STATUTORY DECLARATION OF [REDACTED]

I, [REDACTED] of [REDACTED]
and currently retired, do hereby solemnly and sincerely affirm and declare that:

1. I am the [REDACTED] of Mrs. Satinder Pal Kaur Toor, the sole owner and director of The Firs Lodge Ltd, which operates from 289–291 Bath Road, Hounslow, TW3 3DB. I have actively assisted her in managing the property and its day-to-day operations since 2002.
2. Since the commencement of the Firs Lodge Ltd business at the above address in or around August 2000, I have personally witnessed and been aware of the continuous and active use of the premises for B&B purposes.
3. I used to manage the building and managed the bills during renovation. Between 2002 and 2003, when Flats 291B, 291C, and 291D were acquired and incorporated into the business, some minor modifications were made by me to incorporate bathrooms into each bedroom enhancing guest experience. In 2022, we acquired the remaining part of the freehold which didn't have any kitchen being used throughout as temporary accommodation for Adda hotel staff. The letter confirming this is attached with this declaration.
4. I also confirm that during the early 2000, the business regularly received bookings through directories such as Yellow Pages and Talking Pages, and later through the British Hotels Reservation Centre. I have been managing incoming phone calls in the absence of staff, as well as handling trips to the cash and carry to purchase materials and other necessary items.
5. I am aware that from approximately 2003/2004 onwards, the Bed & Breakfast entered into an arrangement with the UK Home Office under the Refugee Arrival Project (RAP)

to provide accommodation to asylum seekers, which continued for few years for around 2 years.

6. The property also received consistent bookings from various local councils for emergency housing purposes.
7. At no point was there any cessation or discontinuation of the B&B operations, and to my knowledge, the B&B operated in an open and uninterrupted manner throughout.
8. In the year 2018, we received bookings from Sutton Council, Ealing Social Services, and the London Borough of Hounslow. Additionally, I have located the 2018 booking records, which include references to specific room numbers across both 289 and 291 Bath Road. These records clearly demonstrate that the premises were in continuous use during that period.
9. I have read [REDACTED] statement, particularly paragraph 13, which refers to our telephone conversation. I believe there was a misunderstanding during that conversation due to a language barrier on my part. However, I have never denied that Firs Lodge Ltd was used for bed and breakfast (B&B) purposes. I note that even after this conversation, ADDA continued with its position that there was an ongoing B&B use. [REDACTED] statement is attached with my wife's declaration.
10. I further confirm that during the Covid-19 pandemic, from March 2020 to May 2024, the London Borough of Hounslow utilized the property for the accommodation of homeless individuals.
11. The use of the premises as a B&B has, to the best of my knowledge and belief, been continuous from the time of purchase from [REDACTED] who operated it as a Row's as a running Bed & Breakfast since 2002, with all necessary statutory requirements.

AND I make this solemn declaration conscientiously believing the same to be true and by virtue of the Statutory Declarations Act 1835.

[REDACTED]

.....
Signature of the Declarant

Declared at:

[REDACTED]

This17... July 2025

Before me;

[REDACTED]