

Appeal under section 191 of the Town and Country Planning Act 1990 (as amended).

**Appeal by Mrs Toor. Site: The Firs Lodge, 289-291 Bath Road, Hounslow,
TW3 3DB**

Re: LPA final comments in regard to the above appeal.

1. The above appeal relates to the refusal by the Local Planning Authority to a Certificate of Lawfulness for the existing use of the site as a bed and breakfast.
2. The Council's position remains as presented in the Officer's Report and Statement of Case. This includes the position regarding the incompleteness of the evidence and the inconsistent representation of both addresses (289&291 Bath Road) across the submitted documentation. These final comments seek only to address any new points arising from the appellant's statement of case and new evidence received by the Council on 02 July 2025.
3. In their statement of case the appellant has argued that the use of the property as a bed and a breakfast has been continuous since at least 2005. The Council's Planning Enforcement investigations dating from 2011 and 2018, which found that 291 Bath Road was in use as flats refute the claim that there has been continuous bed and breakfast use since 2005. The closure reports for these investigations were included in the appendixes of the LPA's Statement of Case.
4. The appellant has also suggested that the documents related to Planning Enforcement investigation ref MULT/2012/00155 (in appellants APP STATEMENT - 2) reference to use of No. 291 as short-term let flats would be within Use Class C1. However, this report does not identify the Use Class of the property or the length of tenancies and therefore cannot be used to assert that the use of this property falls within Class C1. The appellant has provided nothing as part of the application or additional appeal documents to evidence that the use of No. 291 would fall within Use Class C1.
5. The Council disputes the appellant's claim that the Local Authority's refusal rests on a single speculative assertion, unsupported by enforcement action or substantive documentation. Notwithstanding the contradictory evidence from the 2018 Planning Enforcement investigation, the Council considers that the evidence provided by appellant is both insufficient, imprecise and ambiguous for the reasons explained in the Officers Report and the Statement of Case.
6. The Council has reviewed the additional evidence provided by the appellant on 02 July 2025. Appendix 1 sets out the Council's assessment . In summary, it is considered that the evidence is not sufficiently precise and unambiguous to

demonstrate that, on the balance of probabilities, the site has continuously functioned as a bed and breakfast for ten years prior to the submission of the application.

7. The Council considers that the critical ten-year period between 16 September 2014 and 16 September 2024, 10 years prior to the date of the application, should form the basis of the inquiry. Of the 192 items of new evidence provided, only 19 relate to the critical period. Many of these items have no address listed and/or are excerpts from handwritten diaries and ledgers or card payment receipts which lack further contextual evidence and do not precisely and unambiguously demonstrate a bed and breakfast use. No evidence dated after 2017 was provided.
8. A large portion of the evidence is outside the critical period of the application. The Council understands that the appellant is to propose a secondary or alternative ten-year period, although this specific period has not yet been confirmed. Based on the evidence provided as part of the statement of case, the evidence that pre-dates September 2014 is ambiguous, imprecise, and contains gaps. A significant portion of the evidence is handwritten diary entries or ledgers with no address or invoices relating to the property with no contextual information to clarify what these relate to or what dates these would cover.
9. The appellant has included an Enforcement Notice dated 18 February 13 along with their additional documents but has not referred this in their statement of case. For the avoidance of doubt this enforcement notice relates to the outbuildings at the rear of the property and is outside the critical period. Whilst Paragraph 4.2 states the use of the outbuildings as supplementary bed and breakfast accommodation to the use of the main property, this does not indicate nor confirm the use as main property as bed and breakfast at that time was lawful.
10. For the reasons set out above and in addition to the points raised in the Officer's Report and the LPA's statement of case, the Council maintains that, on the balance of probabilities, the appellant has failed to demonstrate that the site has been in continuous use as a bed and breakfast for a period of ten years, and we

respectfully request that the appeal be dismissed and costs awarded to the Council.

Yours sincerely,

Robert Tomlinson | Planning Apprentice
London Borough of Hounslow

Appendix 1 – Council's assessment of evidence provided on 02 July 2025. This has been ordered chronologically by the Council for ease of understanding.

Date	Evidence Pack	Item	Description
Undated	Pack 5 (151-200)	Rental agreement 291D Bath Road	Rental Agreement Scotland for furnished home or flat on as short assured tenancy. Length of tenancy not listed. Unsigned.
Undated	Pack 5 (151-200)	VAT cancellation request	Business address given only as 289 Bath Road.
2006	Pack 6 (201-248)	Excerpts from written diary and card receipts	No address. Outside critical period.
2008	Pack 6 (201-248)	Excerpts from handwritten diary and card receipts	No address. Outside critical period. Multiple pages, some not fully legible.
2010	Pack 6 (201-248)	Excerpt from handwritten diary February 2010	No address. Outside critical period. Not fully legible and no indication what this relates to.
2010	Pack 6 (201-248)	Excerpts from written diary and card receipts	No address. Outside critical period. Not fully legible and no indication what this relates to.
2011	Pack 6 (201-248)	Excerpt from written diary and card receipts (2011)	No address. Outside critical period.
2012	Pack 5 (151-200)	Excerpt from written diary and card receipts (2012)	No address. Not fully legible and no indication what this relates to. Outside critical period.
2014	Pack 6 (201-248)	Card receipts from November 2014	Firs Lodge with Postcode, but no address. Some illegible or not fully visible. Handwritten annotations with room numbers, but nothing on the receipt indicate what the sale related to.
2015	Pack 6 (201-248)	Card receipts from April 2015	Firs Lodge with Postcode, but no address. Some illegible or not fully visible. Handwritten annotations some say room number, but nothing on the receipt indicate what the sale related to.
2016	Pack 5 (151-200)	Multiple pages of card receipts from 2016	Firs Lodge with Postcode, but no address. Some illegible or not fully visible. Handwritten annotations, with numbers, but nothing on the receipt indicate what the sale related to.

			The receipts date from November 2015, July-August 2016, October 2016, January 2017, March-April 2017. As well as being ambiguous, there are significant gaps in the evidence.
2016	Pack 6 (201-248)	Card receipts from January 2016	Firs Lodge with Postcode, but no address. Some illegible or not fully visible. Handwritten annotations some say room number, but nothing on the receipt indicate what the sale related to.
2017	Pack 6 (201-248)	Card receipts from May/June 2017	Firs Lodge with Postcode, but no address. Some illegible or not fully visible. Handwritten annotations some say room number, but nothing on the receipt indicate what the sale related to.
21/08/02	Pack 5 (151-200)	Refugee housing invoice	Only addressed to 289 Bath Road. Outside critical period. Lists names and dates.
22/09/03	Pack 6 (201-248)	Excerpt from handwritten ledger 22/09/03-02/10/03	No address. Outside critical period.
30/09/03	Pack 4 (101-150)	HMRC VAT calculations	Addressed only to 289 Bath Road. Outside critical period
05/04/04	Pack 6 (201-248)	Excerpt from handwritten ledger 05/04/04-13/04/04	No address. Outside critical period.
01/10/04	Pack 5 (151-200)	Letter from bank re missing payments	Addressed only to 289 Bath Road. Outside critical period
01/10/04	Pack 6 (201-248)	Excerpt from handwritten ledger 01/10/04-08/10/04	No address. Outside critical period.
16/12/04	Pack 5 (151-200)	Handwritten letter re: transfer	Outside critical period
21/03/05	Pack 6 (201-248)	Excerpt from written diary	No address. Outside critical period.
02/05/05	Pack 6 (201-248)	Excerpt from handwritten ledger 02/05/05-28/05/05	No address. Outside critical period.
19/09/05	Pack 4 (101-150)	LB Richmond BACS Remittance advice	Outside critical period. One reference lists 'invoices 27 and 28.'
26/01/06	Pack 4 (101-150)	LB Richmond BACS Remittance advice	Outside critical period. Reference lists 46 and 47.

30/01/06	Pack 5 (151-200)	LB Richmond BACS Remittance advice	Outside critical period. References list 48, 49, 50, but unclear what this relates to.
31/01/06	Pack 5 (151-200)	LB Richmond BACS Remittance advice	Outside critical period. Reference listed as 51.
28/02/06	Pack 6 (201-248)	Excerpt from written diary	No address. Outside critical period.
28/03/06	Pack 6 (201-248)	Excerpt from handwritten ledger 28/03/06-31/03/06	No address. Outside critical period.
01/04/06	Pack 6 (201-248)	Excerpt from written diary showing rooms	No address. Outside critical period.
15/05/06	Pack 6 (201-248)	Excerpt from handwritten ledger 15/05/06-23/05/06	No address. Outside critical period.
27/08/06	Pack 5 (151-200)	LB Hounslow Housing Needs invoice	Outside critical period. Appears to be on top of an LB Richmond Invoice. Lists name of guest and 7 night stay.
04/12/06	Pack 5 (151-200)	LB Richmond Housing Needs B&B Register & Invoice bookings w/c 4/12/06	Outside critical period. Lists guests.
10/12/06	Pack 4 (101-150)	Invoice to LB Hounslow Housing Needs	Outside critical period. Lists guest and 7 night stay.
17/01/07	Pack 5 (151-200)	Excerpt from handwritten diary	Names, rooms, and length of stay appear to be listed. No address. Outside critical period.
20/03/07	Pack 4 (101-150)	Invoice to LB Hounslow Housing Needs	Outside critical period. Includes guest name, Flat 18/19 for 7 nights.
12/05/07	Pack 5 (151-200)	Excerpt from handwritten diary	No address. Four names listed. No indication what this relates to.
09/10/07	Pack 5 (151-200)	Letter from border and immigration agency	Outside critical period
12/03/08	Pack 6 (201-248)	Excerpt from written diary and card receipts	No address. Outside critical period.
25/03/08	Pack 4 (101-150)	HMRC overdue PAYE payment	Addressed only to 289 Bath Road. Outside critical period
31/03/08	Pack 4 (101-150)	HMRC VAT calculations	Addressed only to 289 Bath Road. Outside critical period

01/04/08	Pack 6 (201-248)	Excerpt from ledger 01/04/08-19/04/08	No address. Outside critical period.
05/04/08	Pack 4 (101-150)	HMRC NI letter	Addressed only to 289 Bath Road. Outside critical period
15/04/08	Pack 4 (101-150)	HMRC response to tax return	Addressed only to 289 Bath Road. Outside critical period
16/04/08	Pack 3 (51-100)	Invoice 01/01/08-31/01/08	Outside critical period. For 15 guests for two or one nights.
16/04/08	Pack 3 (51-100)	Invoice 01/02/08-28/02/08	Outside critical period. For 8 guests for one night.
16/04/08	Pack 3 (51-100)	Invoice 01/03/08-31/03/08	Outside critical period. For 22 guests for 1-5 nights.
10/06/08	Pack 2 (101-150)	LB Richmond BACS Remittance advice	Outside critical period. One reference appears to list name.
16/06/08	Pack 2 (101-150)	LB Richmond BACS Remittance advice	Outside critical period. Reference appears to list name and 28/4/08.
30/06/08	Pack 5 (151-200)	British Hotel Reservation Centre list of reservations	Addressed only to 289 Bath Road. Outside critical period. Lists guests and length of stay.
02/07/08	Pack 2 (101-150)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoice relates to.
07/07/08	Pack 3 (51-100)	Invoice 01/04/08-30/04/08	Outside critical period. For 11 guests for 1-3 nights.
07/07/08	Pack 3 (51-100)	Invoice 01/05/08-31/05/08	Outside critical period. For 17 guests for 1-3 nights.
07/07/08	Pack 3 (51-100)	Invoice 01/06/08-30/06/08	Outside critical period. For 17 guests for 1-3 nights.
09/07/08	Pack 6 (201-248)	Electrical inspection	Addressed to Flat 291 C. Outside critical period
10/07/08	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoice relates to.
15/07/08	Pack 6 (201-248)	Excerpt from handwritten diary	No address. Outside critical period.
22/07/08	Pack 3 (51-100)	LB Sutton BACS Remittance advice	Outside critical period. Description listed as Homeless Persons April 2008.
22/07/08	Pack 3 (51-100)	LB Sutton BACS Remittance advice	Duplicate document.
23/07/08	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. Reference appears to include names.
05/08/08	Pack 4 (101-150)	HMRC late payment letter	No address. Handwritten annotations. Outside critical period

13/08/08 or 09	Pack 4 (101-150)	HMRC Self Assessment Statement	Addressed only to 289 Bath Road. Outside critical period
14/08/08	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication what this relates to.
22/08/08	Pack 4 (101-150)	Invoice LB Richmond	Addressed to the Pine Lodge Feltham. Outside critical period
27/08/08	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication what this relates to.
30/09/08	Pack 4 (101-150)	HMRC VAT calculations	Addressed only to 289 Bath Road. Outside critical period
04/10/08	Pack 4 (101-150)	HMRC NI letter	Addressed only to 289 Bath Road. Outside critical period
06/10/08	Pack 4 (101-150)	Invoice LB Richmond	Addressed to the Pine Lodge Feltham. Outside critical period
08/10/08	Pack 4 (101-150)	LB Richmond BACS Remittance advice	Outside critical period. No indication what this relates to.
17/10/08	Pack 5 (151-200)	Council tax account query 291d Bath Road	Addressed to 289 Bath Road. Requesting information on vacated tenant. Tenants name matches undated and unsigned tenancy agreement. Outside critical period.
24/10/08	Pack 4 (101-150)	LB Richmond BACS Remittance advice	Outside critical period. No indication what this relates to.
28/10/08	Pack 3 (51-100)	Invoice 01/07/08-31/07/08	Outside critical period. For 32 guests for 1-6 nights.
28/10/08	Pack 3 (51-100)	Invoice 01/09/08-30/09/08	Outside critical period. For 22 guests for 1-5 nights.
31/10/08	Pack 4 (101-150)	HMRC demand for immediate payment	Outside critical period. Addressed to 289 Bath Road.
29/12/08	Pack 4 (101-150)	LB Richmond BACS Remittance advice	Outside critical period. Reference appears to include a name.
31/12/08	Pack 3 (51-100)	Invoice 01/12/08-31/12/08	Outside critical period. For eight guests for 1 -10 nights. Total amount listed as £1095
31/12/08	Pack 3 (51-100)	Invoice 01/12/08-31/12/08	Outside critical period. Appears to be same guests as above but total amount listed as £710 and price of room varies for last guest.
01/01/09	Pack 3 (51-100)	Invoice 01/01/09-31/01/09	Outside critical period. For one twin room for one night.

01/01/09	Pack 3 (51-100)	Invoice 01/01/09-31/01/09	Duplicate document
05/01/09	Pack 4 (101-150)	LB Richmond BACS Remittance advice	Outside critical period. No indication what this relates to.
16/01/09	Pack 4 (101-150)	Brent Council Remittance advice	Invoice date 28/10/08. Outside critical period. No indication what this relates to.
22/01/09	Pack 4 (101-150)	LB Richmond BACS Remittance advice	Outside critical period. No indication what this relates to.
04/02/09	Pack 4 (101-150)	LB Richmond BACS Remittance advice	Outside critical period. No indication what this relates to.
13/02/09	Pack 4 (101-150)	Invoice LB Richmond	Outside critical period. Vendor listed as 'Leave Care' and summary is 12/01/09
18/02/09	Pack 4 (101-150)	LB Richmond BACS Remittance advice	Outside critical period. No indication what this relates to.
27/02/09	Pack 6 (201-248)	Excerpt from written diary	No address. Outside critical period.
28/02/09	Pack 3 (51-100)	Invoice 01/02/09-28/02/09	Outside critical period. For seven bookings for two or one night.
28/02/09	Pack 3 (51-100)	Invoice 01/02/09-28/02/09	Duplicate document
13/03/2009	Pack 5 (151-200)	Excerpt from handwritten diary	Names listed against numbers, no indication of what this refers to. No address. Outside critical period.
25/03/09	Pack 6 (201-248)	NATCO cash and carry invoice	Outside critical period
30/03/09	Pack 4 (101-150)	LB Richmond BACS Remittance advice	Outside critical period. Of the 8 of the 11 references list name and 7 include dates. Dates range from 10/09/08-09/01/09.
31/03/09	Pack 3 (51-100)	Invoice 31/03/09	Outside critical period. For one single room for one night.
31/03/09	Pack 3 (51-100)	Invoice 01/03/09-31/03/09	Duplicate document. One of the two references appears to list name.
31/03/09	Pack 4 (101-150)	LB Richmond BACS Remittance advice	Outside critical period
31/03/09	Pack 4 (101-150)	HMRC VAT calculations	Addressed only to 289 Bath Road. Outside critical period

15/04/09	Pack 5 (151-200)	Register of restriction against land 289 Bath Road	Addressed only to 289 Bath Road. Outside critical period
08/06/09	Pack 5 (151-200)	LB Richmond BACS Remittance advice	Outside critical period. No indication what this relates to.
09/07/09	Pack 4 (101-150)	Bank statement	Addressed only to 289 Bath Road. Outside critical period
09/07/09	Pack 4 (101-150)	Bank statement	Addressed only to 289 Bath Road. Outside critical period
10/08/09	Pack 5 (151-200).	LB Richmond Housing Needs B&B Register & Invoice bookings w/c 10/08/09	Outside critical period. Partially redacted. Not signed. Lists names of guest.
30/10/09	Pack 4 (101-150)	HMRC VAT payment demand	Addressed only to 289 Bath Road. Outside critical period
12/11/09	Pack 5 (151-200)	LB Richmond BACS Remittance advice	Outside critical period. No indication what this relates to.
18/12/09	Pack 6 (201-248)	Western Timber and Builders' Merchants invoice	Outside critical period
25/01/10	Pack 5 (151-200)	LB Richmond BACS Remittance advice	Outside critical period. No indication what this relates to.
15/03/10	Pack 5 (151-200)	LB Richmond Housing Needs B&B Register & Invoice bookings w/c 15/03/10	Outside critical period. Partially redacted. Not signed. Lists names of guests and rooms numbers.
15/03/10	Pack 6 (201-248)	Excerpt from handwritten diary	No address. Outside critical period.
13/04/10	Pack 4 (101-150)	Bank statement 09 - 13/04/10	Addressed only to 289 Bath Road. Outside critical period
28/05/10	Pack 6 (201-248)	Excerpt from handwritten ledger 28/05/10-31/05/10	No address. Outside critical period.
21/06/10	Pack 4 (101-150)	HMRC VAT Letter	Addressed only to 289 Bath Road regarding payments of outstanding debt. Outside critical period
12/09/10	Pack 5 (151-200)	Parking fine	Outside critical period
19/10/10	Pack 5 (151-200)	Letter from LB Richmond	Outside critical period. Confirming payment of accommodation fees
03/11/10	Pack 5 (151-200)	Bank Statements 03/11/10-05/11/10	Addressed only to 289 Bath Road. Outside critical period

13/12/10	Pack 5 (151-200)	Invoice to temporary accommodation unit Kingston	Outside critical period. Lists guest and family for one night.
04/02/11	Pack 3 (51-100)	Invoice from LB Richmond	Outside critical period. No indication of what the invoice relates to.
07/02/11	Pack 5 (151-200)	Children's emergency duty team Kingston, Merton, Sutton and Richmond Letter	Outside critical period. Confirmation of reservation for night of 07/02/11.
14/02/11	Pack 5 (151-200)	LB Richmond Letter	Outside critical period. Confirmation of payment for accommodation of twin room.
04/03/11	Pack 4 (101-150)	Bank statement March 2010 – March 2011	Addressed only to 289 Bath Road. Outside critical period
15/03/11	Pack 6 (201-248)	Fire alarm and emergency lights testing certificate of work by SafeTech	Outside critical period
22/03/11	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoice relates to.
30/03/11	Pack 6 (201-248)	Excerpt from written diary	No address. Outside critical period.
01/04/11	Pack 6 (201-248)	Handwritten ledger from 01/04/11-11/04/11	No address. Outside critical period.
04/04/11	Pack 3 (51-100)	Invoice from LB Richmond	Outside critical period. No indication of what the invoice relates to.
07/04/11	Pack 5 (151-200)	Hotel Solutions Direct invoice	Outside critical period. Not fully legible. Appears to list guests and room types.
01/07/11	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoice relates to.
22/07/11	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoice relates to.
31/07/11	Pack 4 (101-150)	Merchant card processing statement 01/07/11 – 31/07/11	Addressed only to 289 Bath Road. Outside critical period
19/08/11	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoice relates to.

02/09/11	Pack 3 (51-100)	LB Richmond Children's Services Reservation confirmation	Reservation for two rooms from 2-5/09/11. Outside critical period.
06/09/11	Pack 3 (51-100)	LB Richmond Children's Services Reservation for booking	For one night booking, date changed of reservation changed from 08/09/11 to 06/09/11. Outside critical period
06/09/11	Pack 3 (51-100)	LB Richmond Children's Services Reservation for booking	Same as above without date change. Outside critical period.
09/09/11	Pack 4 (101-150)	Bank Statement	Addressed only to 289 Bath Road. Outside critical period
26/09/11	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoice relates to.
29/09/11	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoice relates to.
26/10/11	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoice relates to.
26/10/11	Pack 6 (201-248)	Excerpt from ledger 26/10/11-31/10/11	No address. Pine Lodge listed. Outside critical period.
28/10/11	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoice relates to.
01/11/11	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoice relates to.
01/11/11	Pack 3 (51-100)	Invoice to Kingston Temporary Accommodation unit	Outside critical period. Lists 3 guests for 3 night stay.
09/11/11	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. Date partially obscured. Handwritten annotation 'Ro2A Domi.'
10/11/11	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. Handwritten annotation 'Ro2A Domi'
25/11/11	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoice relates to.

05/12/11	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoice relates to.
16/02/12	Pack 6 (201-248)	Handwritten ledger 16/02/12-28/02/12	No address. Outside critical period.
21/02/12	Pack 4 (101-150)	HMRC unpaid tax surcharge	Addressed only to 289 Bath Road. Outside critical period
07/03/12	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoice relates to.
23/03/12	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoice relates to.
31/03/12	Pack 4 (101-150)	Merchant card processing statement 01/03/12 – 31/03/12	Addressed only to 289 Bath Road. Outside critical period
10/04/12	Pack 4 (101-150)	Bank Statement	Addressed only to 289 Bath Road. Outside critical period.
13/04/12	Pack 5 (151-200)	Invoice for food STAR	Outside critical period
25/04/12	Pack 5 (151-200)	Payment from Magnet Trade	Outside critical period
04/05/12	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoices relates to.
16/05/12	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoices relates to.
31/05/12	Pack 5 (151-200)	Overdue VAT notice	Only addressed to 289 Bath Road. Outside critical period
21/06/12	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoices relates to.
25/07/12	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoices relates to.
08/08/12	Pack 6 (201-248)	Electrical inspection	Addressed to Flat 291 C. Outside critical period
13/08/12	Pack 6 (201-248)	Shield System LTD Certificate of inspection fire alarm	Outside critical period
30/08/12	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoices relates to.
10/09/12	Pack 5 (151-200)	Bank statement 14 – 15/08/12	Addressed only to 289 Bath Road. Outside critical period
25/09/12	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period

12/11/12	Pack 5 (151-200)	LB Richmond Housing Needs B&B Register & Invoice bookings w/c 12/11/12	Only addressed to 289 Bath Road. Outside critical period. Lists names of guests.
01/12/12	Pack 5 (151-200)	Invoice to LB Richmond	Outside critical period. Lists 4 guests with 7 night stays
20/12/12	Pack 3 (51-100)	LB Richmond BACS Remittance advice	Outside critical period. No indication of what the invoice relates to.
04/01/13	Pack 6 (201-248)	Excerpt from written diary	No address. Outside critical period.
11/02/13	Pack 5 (151-200)	Bank statement 17-21/01/13	Addressed only to 289 Bath Road. Outside critical period
25/02/13	Pack 5 (151-200)	LB Richmond Housing Needs B&B Register & Invoice bookings w/c 25/02/13	Only addressed to 289 Bath Road. Partially redacted. Lists names of guests. Outside critical period.
2/03/13	Pack 5 (151-200)	Magnet trade Credit Memo Return	Outside critical period
11/03/13	Pack 5 (151-200)	Bank statement 14/2/13-18/2/13	Addressed only to 289 Bath Road. Outside critical period
16/04/13	Pack 5 (151-200)	Magnet trade payment receipt	Outside critical period
16/04/13	Pack 6 (201-248)	Excerpt from ledger 16/04/13-28/04/13	No address. Outside critical period.
30/06/13	Pack 4 (101-150)	Merchant card processing statement 01/06/13 – 30/06/13	Addressed only to 289 Bath Road. Outside critical period
14/06/14	Pack 5 (151-200)	LB Hounslow Housing Benefit Overpayment Invoice Reminder	Housing benefit overpayment for 291c Bath Road from 22/01/07-08/04/07, suuggesting longer term usage. Outside critical period
19/06/14	Pack 5 (151-200)	PRS music fee	Outside critical period. Unclear how this relates to the use of the site.
26/06/14	Pack 4 (101-150)	Request for PAYE contribution from Chancellors LLP.	Addressed only to 289 Bath Road. Outside critical period. Does not appear to relate to the use as B&B.
01/07/14	Pack 6 (201-248)	Excerpt from ledger 01/07/14-07/07/14	No address. Outside critical period. No indication this relates to the site or the use as a B&B.
26/11/14	Pack 4 (101-150)	Request for PAYE contribution from Chancellors LLP.	Addressed only to 289 Bath Road. Does not appear to relate to the use as B&B.

30/11/14	Pack 4 (101-150)	Invoice for hotel supplies (bedding etc.)	From interAIR UK. Addressed to 289-291 for linens.
01/12/14	Pack 6 (201-248)	Excerpt from ledger. 01/12/14-17/12/14	No address. References Pine Lodge in Feltham. Ambiguous and imprecise. No indication this relates to the site or the use as a B&B.
01/12/14	Pack 6 (201-248)	Excerpt from ledger 01/12/14-14/12/14	No address. Handwritten References Pine Lodge. Ambiguous and imprecise. No indication this relates to the site or the use as a B&B.
01/01/15	Pack 6 (201-248)	Excerpt from ledger 01/01/15-10/01/15	No address. Handwritten. Appears to relate to supermarket, service stations, DIY store expenses. Ambiguous and imprecise. No indication this relates to the site or the use as a B&B.
09/01/15	Pack 5 (151-200)	Excerpt from handwritten diary	No address. Not fully legible and no indication what this relates to.
08/04/15	Pack 5 (151-200)	LB Hounslow Non-domestic rate final notice	Addressed to The Firs Lodge 289-291, related to overdue payment of nondomestic Council Tax, imprecise and does not evidence continuous use as B&B alone.
27/04/15	Pack 4 (101-150)	Request for PAYE contribution from Chancellors LLP.	Addressed only to 289 Bath Road. Does not appear to relate to the use as B&B.
12/05/15	Pack 6 (201-248)	Excerpt from ledger 12/05/15-20/05/15	No address. Appears to relate to supermarket, service stations, DIY store expenses. Ambiguous and imprecise. No indication this relates to the site or the use as a B&B.
01/06/15	Pack 6 (201-248)	Excerpt from 'The Firs Lodge LTD' handwritten ledger 01/06/15-15/06/15	No address, but some entries refer to Firs Lodge. Handwritten. Entries appear to include utility payments. Ambiguous and imprecise.
01/06/15	Pack 6 (201-248)	Excerpt from ledger 01/06/15-15/06/15	No address. No indication this relates to the whole site or the use as a B&B.
09/06/15	Pack 4 (101-150)	Bank statement for The Firs Lodge	Addressed only to 289 Bath Road. Transfers in from the Firs Lodge from the Firs Lodge LTD and Cardnet, but no indication as to what these relate to.

02/11/15	Pack 6 (201-248)	Excerpt from ledger 02/11/15-13/11/15	No address. Ambiguous and imprecise. No indication this relates to the site or the use as a B&B.
31/12/15	Pack 4 (101-150)	Bank statement for The Firs Lodge	Addressed only to 289 Bath Road. Payments in from Card Net, but no indication as to what these relate to.
02/11/16	Pack 6 (201-248)	Excerpt from ledger 02/11/16-28/12/16	No address. Handwritten. Refers to the Firs Lodge LTD. Ambiguous and imprecise. No indication this relates to the whole site or the use as a B&B.
04/05/17	Pack 4 (101-150)	Striking out of proceedings, failure to provide statement of case	Address listed Firs Bed and Breakfast 289-291 Bath Road. Circumstances of the letter are unclear.