



Tarsem Singh Dhillon
15B Station Road, Hayes

Retail Planning Statement

June 2025

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1. Introduction

- 1.1. This Statement sets out supporting information for the planning application submitted by Tarsem Singh Dhillon for development at 15B Station Road, Hayes for the conversion of upper floors of the unit to enable the formation of a house in Multiple Occupation (HMO) with the retention of the ground floor for retail use (2 units).
- 1.2. Prior to the submission of the planning application a formal pre-application enquiry was made to Hillingdon Council as local planning authority (LPA) to establish issues that would need to be addressed in supporting information submitted with the application (Hillingdon Council reference 17297/PRC/2023/189). The response from the LPA identified a range of matters that required to be addressed including concerns regarding the impact of the development on the viability of the retail units at the ground floor. This statement sets out a response to these retail planning issues and demonstrates that the retail units provided with the proposed development would be of a sufficient size, with appropriate storage/other ancillary space, that would support viable retail units. As a result of this the development would comply with the development plan and planning guidance relevant to this particular concern.
- 1.3. This statement therefore provides the following information:
 - A description of the proposed development (Section 1).
 - An summary of the concern relating to retail planning matters set out in the Hillingdon Council Pre-application Enquiry Advice (Section 1).
 - A review of retail planning policies set out in the Local Plan and NPPF relevant to the application (Section 2).
 - An analysis comparing the proposed retail development floorspace with the range of retail/related service units currently located within Hayes town centre (Section 3).
 - Summary and conclusions (Section 4).

Description of the Proposed Development

Existing Use of the Property

- 1.4. The proposed development is for alterations and change of use of 15B Station Road, Hayes, from residential use (Use Class C3) to a house in multiple occupation (HMO) (Use Class C4).
- 1.5. Although the development is primarily concerned with works and change of use to form the HMO the development will also include alterations at ground floor level to order to provide altered retail units together with access to the HMO property and ground floor cycle storage. As a result of this there will be alterations to the size of the existing retail units, as follows:

Existing Retail Units:

- 1.6. 2 no. retail units. Floor areas estimated from submitted drawings:
 - Gross retail floor area: 248 sq m GFA
 - Net retail sales area: 112 sq m NFA (ground floor)
 - Upper floor *maximum* storage area 136 sq m GFA. Effective storage area is 99 sq m.

Proposed Retail Unit

- 1.7. The drawings submitted with the planning application identify the proposed retail floorspace, as a result of the development, to be:
- Gross retail floor area: 137 sq m GFA (2 units)
 - Net retail sales area (2 units): 112 sq m GFA (i.e. average of 56 sq m per unit)
 - Storage: 25 sq m (15 sq m and 10 sq m respectively)
- 1.8. The changes as a result of the development are, therefore as follows:
- Gross retail floor area (net internal): total reduction of 111 sq m GFA (counting maximum area for storage). Reduction of 74 sq m on the basis of lost useable storage area.
 - Net retail sales area: reduction of 0 sq m
 - Storage and ancillary space: reduction of 111 sq m (max), actual useable space reduction of 74 sq m.

Pre-Application Planning Advice

- 1.9. The pre-application advice was dated 11th January 2024. This addresses a wide range of matters relevant to the proposed development and only a limited part concerns the impact of the proposal on the ground floor retail floorspace that would result from the development proposal.
- 1.10. The advice highlights the key retail planning policies relevant for the proposal as:

Hillingdon Local Plan

- Policy DMTC 1: Town Centre Developments
- Policy DMTC 2: Primary and Secondary Shopping Areas

London Plan

- Policy SD7
- Policy E9

- 1.11. The case officer identifies, on page 5 of the advice, that the proposed development will result in the loss of 136 sq m of retail storage space. As noted above the current proposals are for a total maximum reduction of 111 sq m GFA (although actual useable space the reduction is 74 sq m), all of which would be first floor storage. It should be noted that, although the position set out in this statement and the application that the whole of the upper floor is available for storage for the existing retail units this is not the position in the valuation office record for the units which identifies the following:
- 2 x 44.14 sq m gross floor area all of which is identified as sales area (= 88.28 sq m GFA).
- 1.12. It is clearly the view of the VO that, based on their measurement of the retail units only a limited portion of ground floor area of the building is in retail use and none of the first floor.
- 1.13. Notwithstanding this, it is the position of the analysis in this Statement that the “reduction” in storage area is immaterial to the determination of the planning application. What is material is whether the retail units as proposed in the development would be viable with the amount of sales area and storage area proposed. Section 3 of this Statement demonstrates that the proposed floorspace is more than sufficient for a viable and successful Class E retail unit to trade.
- 1.14. The Pre-Application Advice states that this loss of storage space is critical, it states that:

...the principle of development, as presented, cannot be supported as the applicant has failed to demonstrate that the loss of ancillary space at first floor level would not result in a loss of functionality for the ground floor level retail space thus making it an unattractive unit impacting it's potential occupation. As such, based on the information submitted, the principle of development is considered to be unacceptable.

- 1.15. There are two particular concerns that arise from this statement. The first is that there is an assumption that, at the pre-application enquiry stage, the LPA is stating that the proposal is unacceptable because the prospective applicant has not demonstrated the impact that the development would have on the functionality of the ground floor unit. This is an inappropriate comment at this pre-application stage, instead the LPA should be advising that, in order for the development to be considered acceptable, evidence would be required to demonstrate that the proposed development would not affect the viability of the ground floor retail unit. The evidence that demonstrates this is provided in this Statement.
- 1.16. In fact the net loss of gross floor area and storage area of the retail unit is less than asserted by the LPA in the Pre-Application Advice. The actual loss of storage space is 111 sq m assuming that the whole of the first floor is in this use, however, Valuation Office records confirm that the first floor is not in retail/storage use and that the development will enhance the floorspace available for retail units.
- 1.17. The analysis set out in Section 3 of this Statement demonstrates that, contrary to the comment in the Pre-App Advice there is every reason to consider that the retail unit in the proposed development will be commercially viable and, as such supports the policies set out in NPPF and the Local Plan.

2. Review of Planning Policy

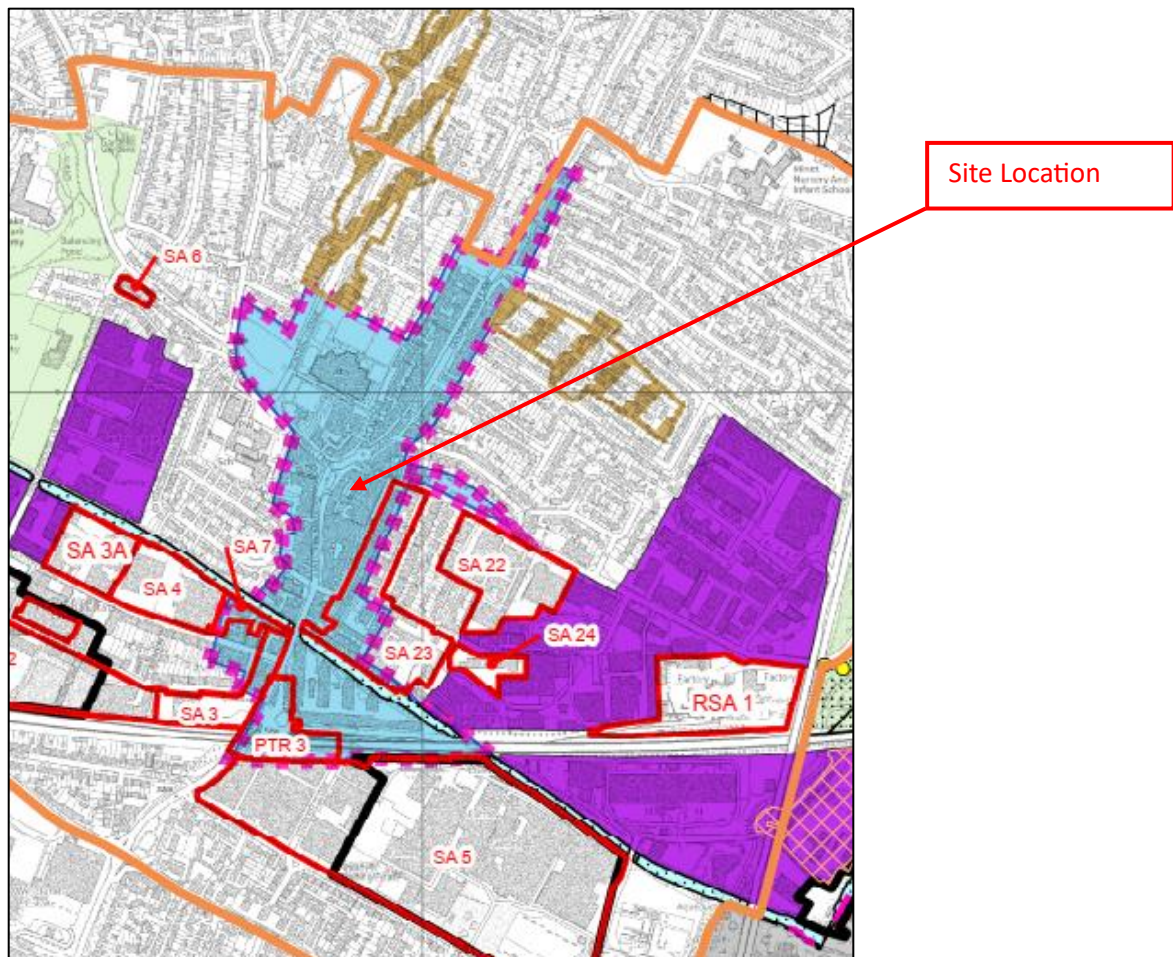
- 2.1. This section only reviews policies relevant to the retail element of the proposed development. This focusses on those policies highlighted in the Pre-Application Advice report.

Hillingdon Local Plan

- 2.2. Figure 1 identifies the location of the development site in the Local Plan Part 2 Policies Map. This identifies that the site is located within:

- A designated Town Centre (Hayes)
- A location for hotel growth
- The site is not included in any particular site allocation

Figure 1: Extract from Hillingdon Local Plan Policies Map



Policy DMTC 1: Town Centre Developments**Policy DMTC 1: Town Centre Developments**

A) The Council will support 'main town centre uses' where the development proposal is consistent with the scale and function of the centre. Town centre development will need to demonstrate that:

- i) adequate width and depth of floorspace has been provided for the town centre uses; and**
- ii) appropriate servicing arrangements have been provided.**

B) Residential use of ground floor premises in primary and secondary shopping areas and in designated parades will not be supported.

C) Proposals for 'main town centre uses' in out of centre locations will only be permitted where there is no harm to residential amenity.

D) The Council will:

- i) expect proposals for 'main town centre uses' to demonstrate that there are no available or suitable sites in a town centre where an edge of centre or out of centre location is proposed, using a sequential approach; and**
- ii) consider the effect of the proposal, either individually or cumulatively on the vitality and viability of existing town centres. Development proposals in out of centre and edge of centre locations, which exceed 200 sqm of gross retail floorspace, or 1,000 sqm of combined main town centres uses, will require an impact assessment.**

- 2.3. Parts A, C and D of Policy DMTC1 are concerned with proposals for main town centre users including, for example, retail and leisure. These parts do not concern other non-main town centre uses, such as proposals for HMO and therefore do not apply to the proposed development.
- 2.4. In terms of the proposed retail floorspace Section 3 confirms that the floorspace proposed will provide sufficient floorspace for the operation of a viable retail unit. There is no suggestion that the existing arrangements for servicing, which will retain the arrangements for the existing retail units are not satisfactory.
- 2.5. Part B, however, is clear that residential uses at ground floor level are not supported in primary and secondary shopping areas. The current proposal proposes the retention of retail use at ground floor level including the provision of storage areas for the retail unit. The proposal is, therefore, fully compliant with policy DMTC1.

Policy DMTC 2: Primary and Secondary Shopping Areas

- 2.6. Policy DMTC2 sets out additional requirements for primary and secondary shopping areas. These are defined on page 19 of the Local Plan Part 2. The text of the policy is set out below.

Policy DMTC 2: Primary and Secondary Shopping Areas

A) In primary shopping areas, the Council will support the ground floor use of premises for retail, financial and professional activities and restaurants, cafes, pubs and bars provided that:

- i) a minimum of 70% of the frontage is retained in Use Class A1;**
- ii) Use Class A5 hot food takeaways are limited to a maximum of 15% of the frontage;**
- iii) the proposed use will not result a separation of more than 12 metres between A1 retail uses; and**
- iv) the proposed use does not result in a concentration of non retail uses which could be considered to cause harm to the vitality and viability of the town centre.**

B) In secondary shopping areas, the Council will support the ground floor use of premises for retail; financial and professional activities; restaurants, cafes, pubs and bars; launderettes and other coin operated dry cleaners; community service offices, including doctor's surgeries provided that:

- i) a minimum of 50% of the frontage is retained in retail use; and**
- ii) the uses specified in policy DMTC4 are limited to a maximum of 15% of the frontage;**
- iii) the proposed use does not result in a concentration of non retail uses which could be considered to cause harm to the vitality and viability of the town centre.**

C) The Council will give consideration to the provision of community facilities within secondary frontages where it can be demonstrated that theses will be open to members of the public and would support the vitality and viability of the centre.

D) Outside of defined primary and secondary areas, proposals for a change of use from A1 retail will be permitted, provided the change does not result in the loss of an essential local service.

- 2.7. Part A extends the principle identified in DMTC1 Part B in that it supports ground floor uses within primary shopping areas for retail, specified service uses and food & drink uses, subject to certain restrictions highlighted in the sub paragraphs. A similar approach is adopted in Part B for secondary shopping areas. As noted above the current proposal retains retail on the ground floor of the unit and, regardless of whether the building is located within primary or secondary shopping areas, the proposal is clearly compliant with policy DMTC2.

London Plan

Policy SD7 Town centres: Development Principles and Development Plan Documents

- A When considering development proposals, boroughs should take a town centres first approach, discouraging out-of-centre development of main town centre uses in accordance with Parts A1 - A3, with limited exceptions for existing viable office locations in outer London (see [Policy E1 Offices](#)). Boroughs should:
- 1) apply the sequential test to applications for main town centre uses, requiring them to be located in town centres. If no suitable town centre sites are available or expected to become available within a reasonable period, consideration should be given to sites on the edge-of-centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport. Out-of-centre sites should only be considered if it is demonstrated that no suitable sites are (or are expected to become) available within town centre or edge of centre locations. Applications that fail the sequential test should be refused
 - 2) require an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for retail, leisure and office uses that are not in accordance with the Development Plan. Applications that are likely to have a significant adverse impact should be refused
 - 3) realise the full potential of existing out-of-centre retail and leisure parks to deliver housing intensification through redevelopment and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking. This should not result in a net increase in retail or leisure floorspace in an out-of-centre location unless the proposal is in accordance with the Development Plan or can be justified through the sequential test and impact assessment requirements in Parts A(1) and A(2) above.

- 2.8. Parts B and C of the Policy set out requirements for LPAs for the preparation of development plans and, as such, do not apply directly to the determination of planning applications.
- 2.9. The current proposal is, primarily, for the development/use of the upper parts of the unit for HMO use with the retention of retail at ground floor level. Insofar as retail use is retained the location of the site is within a defined town centre and is, therefore, fully compliant with the principles of the sequential test.
- 2.10. The policy does not provide any comment or advice on the role of non-retail uses within defined town centres and therefore cannot be used to provide any assessment (positive or negative) of the HMO proposal.

Policy E9 Retail, Markets and Hot Food Takeaways

- 2.11. The following aspects of Policy E9 are relevant to the determination of planning applications affecting retail floorspace. The remaining parts of the policy concern requirements for development planning/policy frameworks and other types of development not included in the current proposals.

A A successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres (Policy SD6 Town centres and high streets, Policy SD8 Town centre network, Policy SD7 Town centres: development principles and Development Plan Documents and Policy SD9 Town centres: Local partnerships and implementation).

C Development Plans and development proposals should:

- 1) bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres
- 2) support convenience retail in all town centres, and particularly in District, Local and Neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision where there is less need to travel

2.12. Part A of policy E9 provides an overarching aim for supporting a competitive and diverse retail sector within London as a whole which is to be achieved through the application of more specific policies of the London Plan.

2.13. It is noted that the Pre-Application Advice provided by the LPA does not make reference to these additional policies and, in part, this reflects their over-arching nature as strategic policies. Nonetheless, aspects of these other policies are directly relevant to the current proposal – in particular **Part C of Policy SD6 Town centres and high streets** states:

The potential for new housing within and on the edges of town centres should be realised through mixed-use or residential development that makes best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport.

2.14. The current proposal directly supports and is supported by this policy: it provides a mixed-use development with HMO/residential use above retail at ground floor level. The site is located immediately adjacent to a wide range of services and public transport services.

2.15. **Policy SD8 Town centre network** is concerned with the role of centres within the wider network and Part A refers to the role of centres and potential for growth set out in Annex 1 of the London Plan. This is significant because in relation to Hayes town centre Annex 1 identifies:

- Hayes town centre is identified as a *District centre* in the London network (figure A1.1);
- Its commercial growth potential is identified as “low” (figure A1.2); however
- Its residential growth potential is identified as “high” (figure A1.3)

2.16. It is clear that, insofar as the current proposal is modest in scale, it is directly in accord with the policies relevant to the proposal in the London Plan supporting the retention of retail while encouraging residential growth.

NPPF

2.17. Section 7 of the NPPF 2023 concerns planning for town centres. The principal provisions relevant to the determination of applications are:

- Application of sequential test to applications for main town centres (Para 87-89, 91).
- Use of impact assessments for retail and leisure development outside town centres (paras 90-91)

2.18. The current proposal includes for the retention of existing retail units within a defined town centre. There is, therefore, no requirement for either a sequential or impact test in accordance with the NPPF.

Review

- 2.19. The Pre-Application Consultation report asserts that the loss of 136 sq m storage space would, ultimately lead to the loss of the retail unit. As will be demonstrated in the next section there is absolutely no evidence for this and, to the contrary, there is very strong evidence that the unit will continue to be a viable and successful retail unit based on its physical characteristics. It is, therefore, an unsupported speculative comment on the part of the LPA case officer.
- 2.20. Nonetheless, at this stage, it is essential that the review of policy must be based on the correct interpretation of policies as set out in the development plan and NPPF. One must interpret policies based on a common-sense interpretation of the wording of the policies written in plain English and there is no option for the decision-maker to place their own interpretation on the text of the policy if this is anything other than the plain-English interpretation of the text. This was made absolutely clear in the Supreme Court case *Tesco Stores Ltd v Dundee City Council* 2012, in which the judgement states that *planning authorities...cannot make the development plan mean whatever they would like it to mean.*¹
- 2.21. In this context the scope and wording of the relevant policies in the development plan and NPPF are clear and the current proposal, which provides for retail use at the ground floor of the property is clearly compliant with and supported by the relevant policies of the development plan. Section 3 demonstrates that, notwithstanding this compliance with policies, that there is no basis for suggesting that the unit would not be a viable Class E retail unit.

¹ *Tesco Stores Limited (Appellants) v Dundee City Council (Respondents)* (Scotland) – Lord Reed para 19

3. Viability of Proposed Retail Units

Introduction

- 3.1. The position of the LPA case officer in the Pre-Application Consultation Report is that:
- The existing retail unit comprises both the ground and first floor of 15B Station Road.
 - The proposed development would result in the loss of 136 sq m GFA storage space.
 - As a result of this loss the development *could* reduce the ability of the ground floor retail unit to function ultimately leading to the loss of the retail unit.
- 3.2. There are a number of issues that need to be considered in response to these comments:
- First that the comment is speculative: the report provides absolutely no evidence as to why the case officer considers that the scenario suggested could occur. The case officer is not a retailer nor a property agent dealing with retail units in Hayes town centre and cannot, therefore, point to experience supporting this assertion.
 - Second, the loss of space identified is factually incorrect. The maximum potential loss of storage space is 111 sq m GFA and, in fact, the Valuation Office records identifying that existing retail space at 15B Station Road is significantly less than is proposed in this application.
 - Third, even if one or both of the units are vacant for a period of time this does *not* constitute the loss of a retail unit. There is no inevitability that a period of vacancy will result in the abandonment of the retail use – the units will continue as Class E units although, for a period of time, they could be unoccupied. There are, of course, numerous vacant units in Hayes town centre at any one point in time and any healthy town centre will have a “churn” of units i.e. when there will always be some units vacant between occupiers. Sometimes these are short-periods, sometimes they are longer. The units will continue to be Class E and the proposed development does not propose the loss of either Class E unit.
 - Fourth, in the absence of an Article 4 Direction that restricts permitted development rights, the introduction of Class E in the Use Classes Order and the permitted development that allows changes within Class E and between Class E and other Classes without the need for express planning permission. In this way the LPA is not able to stop changes in use away from *retail* to other uses within this and any other Class E unit within the town centre. It is significant that only subclass E(a) concerns retail use – all other subclasses concern other types of use to which uses can be changed without express planning consent.
- 3.3. Each of the above matters confirm that the Pre-Application Consultation report is fundamentally in error in suggesting that the proposed development would be unacceptable in retail policy terms. Nonetheless, the remainder of this section sets out very clear evidence that demonstrates that, disregarding all of the above, the proposed development which would provide 2 no. ground floor retail units each of 65 sq m including 7 sq m of storage for each unit would provide a perfectly attractive and viable retail unit.
- 3.4. At this stage it is important to note that, the physical size and configuration of a retail unit is only one of many factors that determine whether or not a retail business would be viable. The primary determinant is not, in fact, the physical size of the unit, but the skills of the business owner and operator to provide a retail offer that is able to generate sufficient custom to cover the full costs of the business. This covers issues such as the nature of the retail offer (price, quality of offer, range of goods, quality of service etc), competition, financing and market potential/growth. Furthermore, location is just as important as physical form of the unit since this affects market accessibility and business profile.

- 3.5. Despite these numerous additional concerns the case officer has asserted that the limitation of the unit size will, in fact, determine the viability of the unit. In this regard the issue is not whether not that the units in combination lose 111 sq m storage space (i.e. 55.5 sq m each) but whether the resultant units, with 65 sq m GFA each would, or would not, be sufficiently attractive to support a viable retail business.
- 3.6. This issue has been assessed by comparing the proposed retail units that would be provided at the ground floor of the property with the size of all other units located within Hayes town centre as identified by the Valuation Office.

Analysis of Retail Units in Hayes Town Centre

- 3.7. Data on the floorspace of all retail and related service units is available from the Valuation Office (<https://www.tax.service.gov.uk/business-rates-find/search>). In total 285 retail and related units were identified – entries for properties no longer on the valuation roll were excluded from the analysis.
- 3.8. Categories included in the analysis were:
- Shop and premises
 - Hairdressing salon and premises
 - Restaurant and premises
 - Bank and premises
 - Betting shop and premises
 - Takeaway food shop
 - Kiosk and premises – “kiosk” is the term used by the VO for smaller retail units typically under 40-50 sq m GFA
- 3.9. About 85% of the above units were identified as either shops or “kiosks” – the remaining categories comprised only a small proportion of entries. However, in all categories the VO identified the retail areas and additional space in units. This approach is, coincidentally, consistent with permitted changes of use within Class E of the Use Class Order.
- 3.10. The property search considered those parts of the streets located with the defined town centre on the Local Plan policies map:
- Botwell Lane
 - Broadway Parade
 - Clayton Road
 - Coldharbour Lane
 - Crown Close
 - East Avenue
 - Station Approach
 - Station Road
- 3.11. The full list of entries is set out in Appendix A. The following table identifies the categories of floorspace that are identified in the VO entries and how these have been classified in this analysis.

Types of Floorspace Classifications

VO Category	GP Analysis Classification – Appendix A	Summary Classification	
Retail zone A	Zone A	Net Retail Area	Gross retail Floor Area
Retail zone B	Zone B		
Retail zone C	Zone C+		
Retail zone D			
Remaining retail zone			
Internal storage	Storage etc	Storage etc	
External store (1)			
Kitchens/staff rooms/toilets etc			

Note: External stores are floorspace within built stores but external to the main retail unit – this excludes an areas of open storage which are identified as yards and similar in the VO entries and have been excluded from the GP analysis.

- 3.12. Zones A – D refer to the categories of retail sales areas within units which are valued on a halving back approach (i.e. rental value per sq metre of Zone B is half that of Zone A based on standard English 6.1m zone depths). Zones are not used for larger retail units, instead, for these the total sales area is identified as a single figure.

Analysis of Retail Units

- 3.13. The assessment of the data has been based on three measures:

- Total gross floor area of retail units (internal space only). By way of comparison the proposed units at 15B Station Road are each 68.5 m GFA
- Net sales floorspace of retail units. By way of comparison the proposed units at 15B Station Road are each 56 sq m GFA
- Storage areas of retail units. The proposed storage areas for the proposed units are 10 and 15 sq m respectively.

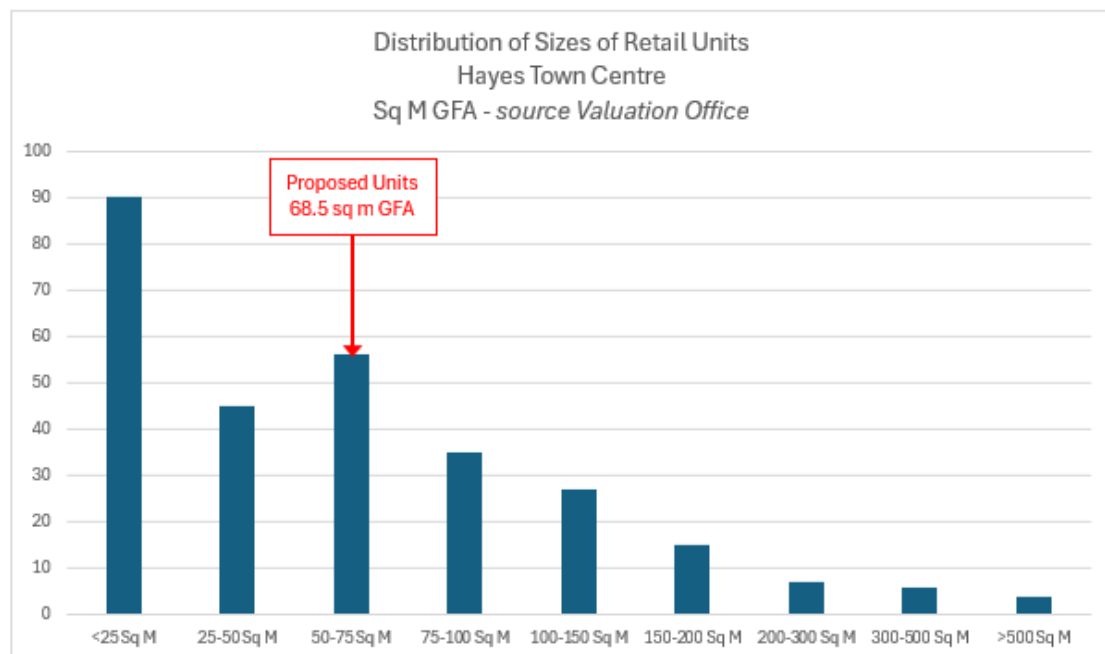
- 3.14. This analysis has been undertaken for both all retail units and, recognising the high number of very small retail units within Hayes town centre, excluding these very small units and only considering units of at least 50 sq m GFA.

Comparison to All Retail Units in Hayes Town Centre

- 3.15. The search of the VO data for Hayes Town Centre identified 285 units in total.

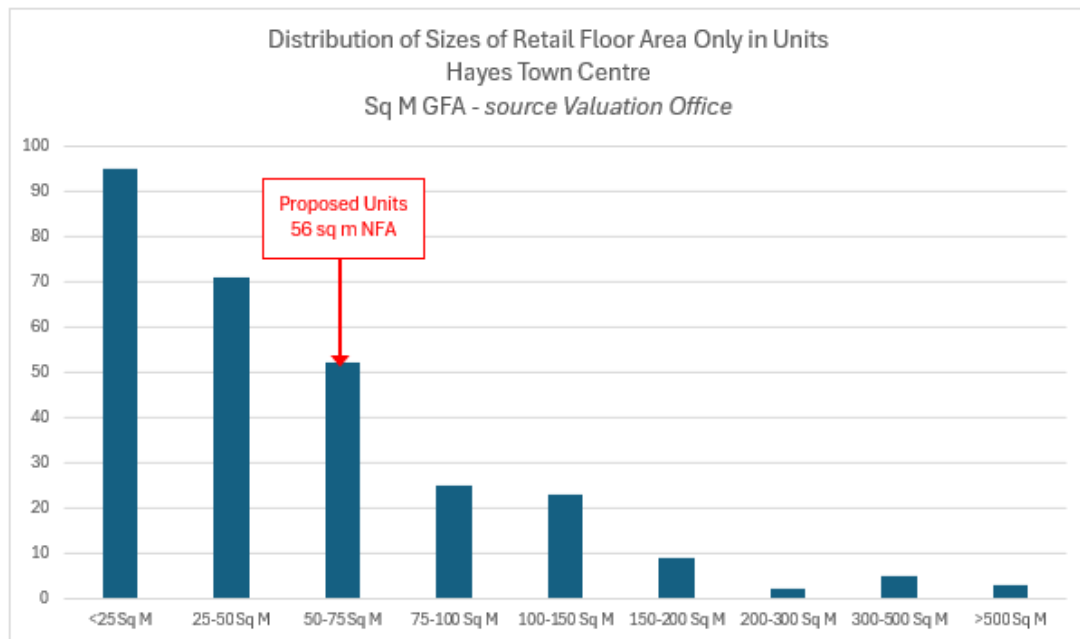
- 3.16. Figure 2 shows the distribution of retail units by GFA within the town centre. This shows that there is a high proportion of small units in the town centre. The average (mean) GFA for retail units in the town centre is 81.7 sq m GFA and the median of units in the town centre is 54.9 sq m GFA whereas the proposed units would be 65 sq m GFA i.e. the proposed retail unit would be slightly below the mean of units in the town centre but slightly larger than the median.

Figure 2: All Retail Units – Distribution of Gross Floor Area



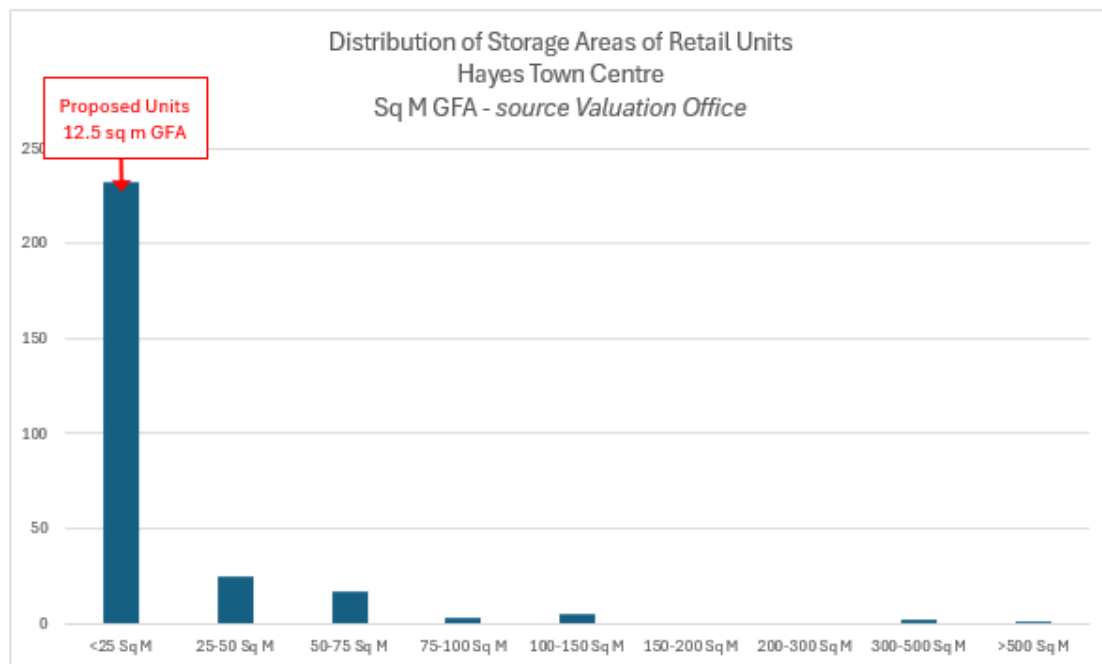
- 3.17. Figure 3 shows the distribution of net sales area as identified by the VO. This also shows that there is a large proportion of retail units with only a small amount of sales area within the town centre. The average (mean) net sales area is 63 sq m NFA and median is 41.4 sq m NFA which compares to 58 sq m GFA for the two units proposed at 15B Station Road. Again the proposal unit at 15B would be slightly less than the mean for units in the town centre but larger than the median for the town centre.

Figure 3: All Retail Units – Distribution of Size of Sales Floor Area



- 3.18. Figure 4 sets out the same information based on the identified storage and other additional space using the VO data. It is notable that the VO data identifies a significant number of units do not have separately identified storage/ancillary space. This does not mean that parts of the units are not used for storage/ancillary use just that the VO has not distinguished this from the sales area. This is significant because, as with many existing units, operators from the proposed units at 15B Station Road will, inevitably, use part of their main units for ancillary purposes including storage. The average (mean), from the VO data is 18 sq m storage/ancillary space but that the median is, in fact, 0 sq m storage space. By way of comparison the proposed development provides 7 sq m separate storage per unit i.e. less than the mean figure but above the median figure.
- 3.19. It is also notable that only a very small proportion of all retail units (5% of the total) have greater than 50% of gross floor area as storage and other ancillary space). The implication of this is that, if the retail unit included the suggested first floor as storage this would provide an amount of storage that would be highly unusual for shops in Hayes town centre. This reaffirms the position set out in the VO data for 15B Station Road that, regardless of the assumptions adopted in this planning application, the first floor of the property is not used as retail storage.

Figure 4: All Retail Units – Distribution of Storage and Ancillary Space Size



Summary

3.20. The analysis of all retail and related units within Hayes town centre demonstrates that the proposed unit at 15B Station Road would be:

- In terms of total gross floor area of units, the proposed shops would be close to the average of existing retail units within the town centre – they would be slightly smaller than the mean size of units but larger than the median size of units.
- In terms of net sales area, the proposed units would also be close to the average of existing retail units within the town centre – they would be slightly smaller than the mean size of units but larger than the median size of units.
- In terms of storage/ancillary area the proposed units would also be less the mean size of units but larger than the median size of units in the town centre. However, both existing town centre shops and the proposed units at 15B Station Road will includes areas within the main part of the retail units for ancillary/storage purposes – this is normal for these types of shops.

3.21. This evidence would demonstrate that, in terms of floorspace proposed, the retail units would be directly comparable to and typical of retail shops within the town centre. There is, therefore absolutely no support for the proposition that the proposed retail unit would not be viable.

Analysis Excluding Small Retail Units

3.22. A particular characteristic of Hayes town centre is that it has a large number of small retail units – in total there are, according to the VO, 90 units less than 25 sq m GFA and a further 45 units between 25 and 50 sq m GFA. It could be argued that the characteristics of these small units are different from larger shops and therefore comparison with these is not valid. It is difficult to see any justification for such an argument since even small units are required to have areas for keeping stock, admin and facilities for staff. Nonetheless, a similar analysis to that presented above has been undertaken comparing the proposed unit with existing shops in the town centre greater than 50 sq m GFA. This analysis is set out in Figures 5, 6 and 7.

Figure 5: Units > 50 Sq M GFA – Distribution of Gross Floor Area

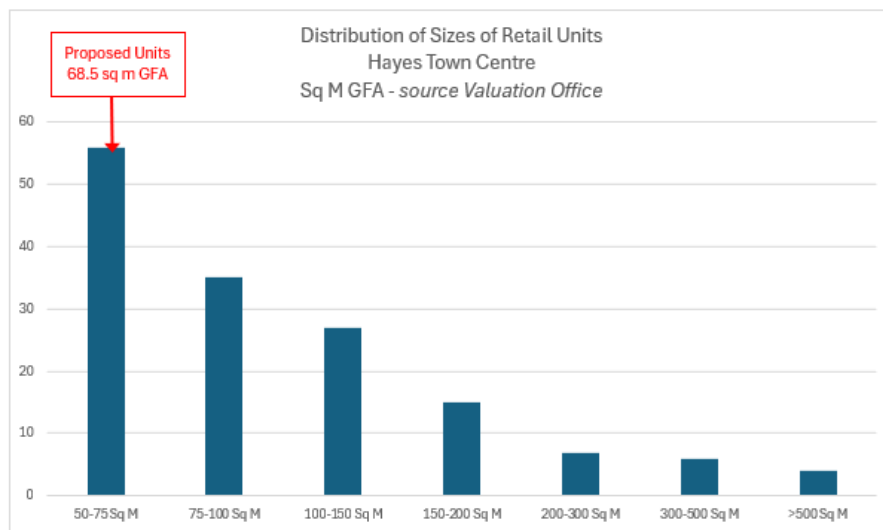


Figure 6: Units > 50 Sq M GFA – Distribution of Size of Sales Floor Area

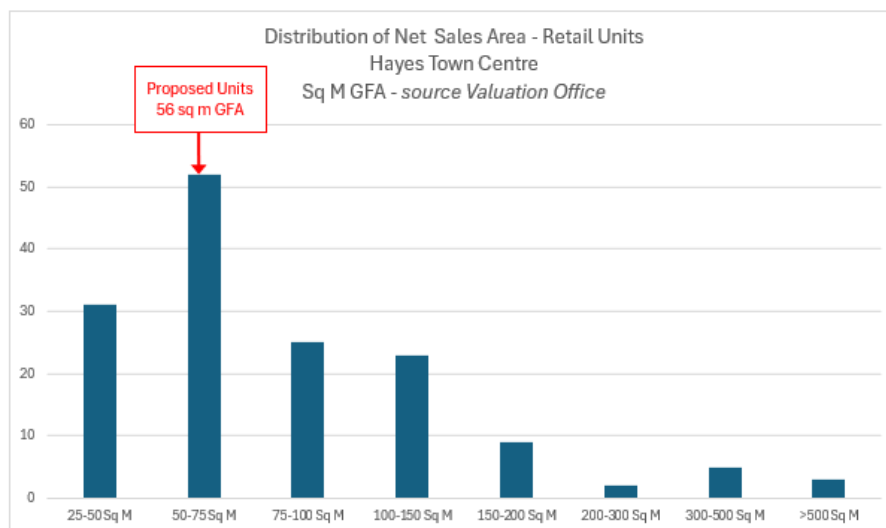
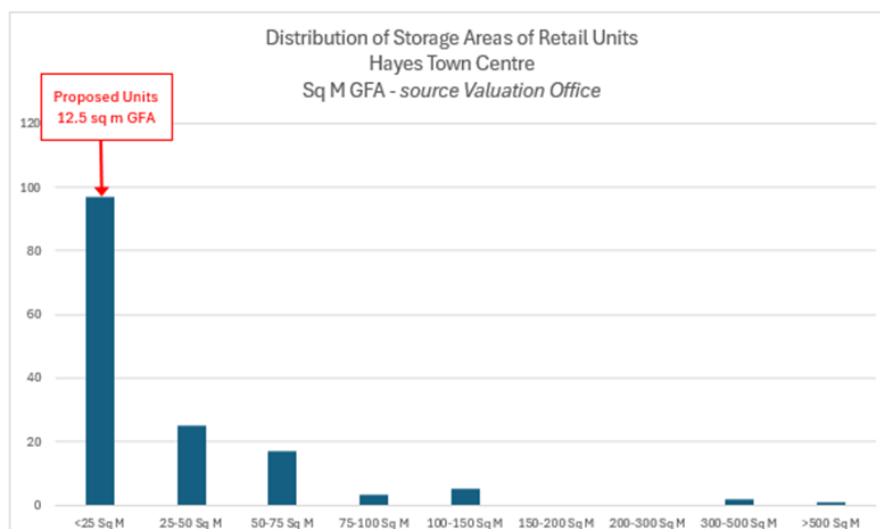


Figure 7: Units > 50 Sq M GFA – Distribution of Storage and Ancillary Space Size



- 3.23. The three figures demonstrate that, even when the smallest retail units are excluded from the analysis, the proposed ground floor units at 15B Station Road would be towards the lower end of larger retail units within the town centre but, nonetheless, would be in the largest group of retail units measured by each of gross floor area, net sales area and storage/ancillary area. This reaffirms the earlier conclusions in that the proposed retail units would be very typical of, and comparable to, a large number of other retail units within Hayes town centre.

Conclusion

- 3.24. The analysis of VO data for retail and related commercial units in Hayes town centre confirms that the proposed retail units that would occupy the ground floor of 15B Station Road would be directly comparable to those typically found in the town centre. Three separate measures of comparison have been used – gross retail floor area, net/sales floor area and storage/ancillary floorspace area and, for each measure, it has been shown that the proposed retail units will be close to the average (mean and median) for existing retail units in the town centre.
- 3.25. Hayes is a successful town centre and there is no indication that the relatively small size of units in the town centre results in a loss of retail activity and loss of retail units. It follows therefore, that, rather than the size of the units proposed being likely to result in the loss of retail floorspace, the proposed units are exactly the type of retail units that have been and will continue to be successful in the town centre. This view is strengthened by the fact that the Valuation Office confirms that, in reality, the upper floor is not in sustained retail storage use and does not contribute to the viability of the existing retail units. The proposed units are, therefore, of a size and configuration that will directly support the retail function of the town centre and will support its vitality and viability.

4. Summary and Conclusions

- 4.1. This Statement sets out supporting information for the planning application submitted by Tarsem Singh Dhillon for development at 15B Station Road, Hayes for the conversion of upper floors of the unit to enable the formation of a house in Multiple Occupation (HMO) with the retention of the ground floor for retail use (2 units).
- 4.2. The proposed development will provide for two no. retail units at ground floor level each with 56 sq m net/sales area, and, on average, 12.5 sq m separate storage areas – a total of 68.5 sq m GFA in total for each unit (average).
- 4.3. The proposed retail floorspace has been reviewed in terms of the provisions of the Hillingdon Local Plan, the London Plan and NPPF. It has been demonstrated that these proposals are fully compliant with and supported by relevant policies in these Plans.
- 4.4. The viability of the proposed retail units was questioned by the case officer in the Pre-application Enquiry Advice provided by Hillingdon Council. In this advice it was asserted, without any evidence, that the loss of storage space could lead to the loss of the retail units altogether. In response to this the viability of the proposed retail units in terms of their floorspace has been assessed by comparing the units with existing retail units in Hayes town centre as evidenced by data from the Valuation Office. This analysis identified 285 retail and related units within the defined town centre and for each the net retail floorspace and additional internal storage/ancillary space has been identified.
- 4.5. It has also been noted that, although the Pre-application Enquiry Advice focussed solely on the loss of storage area as the basis for suggesting that the viability of the retail units would be threatened there are, in fact a wide range of additional factors, some of which are much more important than the extent of storage, that will determine whether or not a retail business remains viable. The primary determinant is not, in fact, the physical size of the unit, but the skills of the business owner and operator to provide a retail offer that is able to generate sufficient custom to cover the full costs of the business. This covers issues such as the nature of the retail offer (price, quality of offer, range of goods, quality of service etc), competition, financing and market potential/growth. Furthermore, location is just as important as physical form of the unit since this affects market accessibility and business profile.
- 4.6. This analysis of VO data for retail and related commercial units in Hayes town centre confirms that the proposed retail units that would occupy the ground floor of 15B Station Road would be directly comparable to those typically found in the town centre. Three separate measures of comparison have been used – gross retail floor area, net/sales floor area and storage/ancillary floorspace area and, for each measure, it has been shown that the proposed retail units will be close to the average (mean and median) for existing retail units in the town centre.
- 4.7. Hayes is a successful town centre and there is no indication that the relatively small size of units in the town centre results in a loss of retail activity and loss of retail units. It follows, therefore, that, rather than the size of the units proposed being likely to result in the loss of retail floorspace, the proposed units are exactly the type of retail units that have been and will continue to be successful in the town centre. This view is strengthened by the fact that the Valuation Office confirms that, in reality, the upper floor is not in sustained retail storage use and does not contribute to the viability of the existing retail units. The proposed units are, therefore, of a size and configuration that will directly support the retail function of the town centre and will support its vitality and viability.
- 4.8. In conclusion, the storage area of the proposed retail units is perfectly reasonable to support sustained and viable retail businesses from the proposed units. Indeed the proposal will provide floorspace that is *better* suited to sustaining retail businesses than the existing configuration of the units. As a result the proposal is fully compliant with the relevant policies set out in the development plan and other material considerations.

Appendix A:

Valuation Office Data – Retail and Related Units

Hayes Town Centre

ALL UNITS						
Street	Number	Zone A	Zone B	Zone C+	Storage etc	Total
Station Road	1	31.5	28.5		27.6	87.6
Station Road	3	32.5	29.6		7	69.1
Station Road	5-7	67.5	50.6	18.1	62.9	199.1
Station Road	8	58.3	52.7	221.8	315.6	648.4
Station Road	8A	44.53	44.53	133.53	44.1	266.69
Station Road	9	33	29.4		2.6	65
Station Road	10	44.3	44.3	57.4	15.2	161.2
Station Road	10A	31.8	39.4	31.2	2.4	104.8
Station Road	11	15	6.42		0	21.42
Station Road	11B	14.94	6.39		0	21.33
Station Road	12	19.5	13.3		11.4	44.2
Station Road	15 (Unit 2)	8.65			0	8.65
Station Road	15 (Unit 3)	36.68			1.83	38.51
Station Road	15B (Unit 1)	44.14			0	44.14
Station Road	15B (Unit 2)	44.14			0	44.14
Station Road	17LHS	27.2	27.2		5.6	60
Station Road	17RHS	6			0	6
Station Road	18	33.8	33.7	28.5	5.6	101.6
Station Road	20 (Unit 2)	17.9			0	17.9
Station Road	20 (Unit 3)	17.6			0	17.6
Station Road	20 (Unit 4)	14.4			0	14.4
Station Road	20 (Unit 5)	15.7			0	15.7
Station Road	20 (Unit1)	19.2			0	19.2
Station Road	21	33	30		2	65
Station Road	23	33.8	29.8		30.3	93.9
Station Road	25	32.3	27.8		11.1	71.2
Station Road	27GF	33.66	37.22	552.1	49.51	672.49
Station Road	28-30	62.61	39.25	12.45	63.11	177.42
Station Road	29GF	57.43	59.89	60.93	0	178.25
Station Road	32-36	87.4	61.6	43.4	6	198.4
Station Road	37	110.9	129.9	496.7	387.2	1124.7
Station Road	38	27.9	27.9	89.8	0	145.6
Station Road	40	32.6	18.2		4.1	54.9
Station Road	40-42 (Unit 1)	11.3			0	11.3
Station Road	40-42 (Unit 2)	11.06			0	11.06
Station Road	40-42 Unit 3	9.02			0	9.02
Station Road	41	31.8	27.4		14.9	74.1
Station Road	42	27.2	27.1	13	41.1	108.4
Station Road	42A	27	52.7		0	79.7
Station Road	43	30	30	15.09	0	75.09
Station Road	44 (Unit 1)	26.11			0	26.11
Station Road	44 (Unit 2)	23.2			0	23.2
Station Road	44 (Unit 3)	14.04			0	14.04
Station Road	44 (Unit 4)	11.9			0	11.9
Station Road	44 (Unit 5)	13.16			0	13.16
Station Road	44 (Unit 6)	11.82			0	11.82
Station Road	44 (Unit 7)	13.16			0	13.16
Station Road	44 (Unit 8)	11.25			0	11.25
Station Road	46	27.4	27.4	27.2	0	82
Station Road	48	24.37	23.18	25.79	0	73.34
Station Road	49	29.38	31.26	25.79	0	86.43
Station Road	51	37.8	51.6	70.2	70.6	230.2
Station Road	53-55	55.7	55.7	701.2	824.8	1637.4
Station Road	56 (Unit 1)	16.9	15.79		9.73	42.42
Station Road	56 (Unit 2)	16.9	16.9	1.02	3.66	38.48
Station Road	63 (Unit 1)	22			0	22
Station Road	63 (Unit 2)	16.18	9.04		0	25.22
Station Road	57	50.5	53.6	44.1	0.7	148.9
Station Road	58	33.5	33.9	14.6	38.9	120.9
Station Road	59	52.9	50.5	23	32.6	159
Station Road	60	33.9	34.7	12.2	34	114.8
Station Road	61	31.4	38.2	7.5	11.4	88.5
Station Road	63	31.3	9.9		50.1	91.3
Station Road	65	26.3	14.5	38.5	0	79.3
Station Road	67	28.61	14.63		38.38	81.62
Station Road	69	30	14.5		17.3	61.8
Station Road	71	30.8	15.4		20.6	66.8
Station Road	73	30.7	30.7	30.7	0	92.1
Station Road	75	61.2	61.2	66.83	136.52	325.75
Station Road	107GFL	15.86	1.02		8.24	25.12
Station Road	107GFR	13.39	2.37		0	15.76

ALL UNITS

Street	Number	Zone A	Zone B	Zone C+	Storage etc	Total
Station Road	107R	8.24			0	8.24
Station Road	111-113GFL	18.9			0	18.9
Station Road	111-113GFR	5.89			0	5.89
Station Road	Unit 1	12.29			0	12.29
Station Approach	3	97.13			37.42	134.55
Station Approach	5	130.5			0	130.5
Station Approach	Play Hayes	136.84			0	136.84
Station Approach	Tesco Express	368.92			0	368.92
Clayton Road	3	21.3	31.4	10.7	0	63.4
Clayton Road	4	25	17.7		15.2	57.9
Clayton Road	6	16.9	10.1		13.9	40.9
Clayton Road	7	13.59	31.39	15.43	9.51	69.92
Clayton Road	8-10	36.33	12.98		0	49.31
Clayton Road	11-21 Unit A	23.67	29.37		2.28	55.32
Clayton Road	11-21 Unit B1	19.51	30.94	3.37	0	53.82
Clayton Road	11-21 Unit C	20			0	20
Clayton Road	11-21 Unit C1	14.89	55.83	4.83	5.71	81.26
Clayton Road	12 GF	33.47	13.1		0	46.57
Clayton Road	14	17.65	5.47		2.68	25.8
Clayton Road	16	21.49	6.19		0	27.68
Clayton Road	18	18	12.4		13.9	44.3
Clayton Road	20	23.3	37.1	5.6	5.5	71.5
Clayton Road	22A	6.54	7.9	7.89	0	22.33
Clayton Road	22	12.75	2.12		0	14.87
Crown Close	1	17.8	35.3		25.4	78.5
Botwell Lane	1	32.7	7.3		35.4	75.4
Botwell Lane	2	33.6	28.9		2.6	65.1
Botwell Lane	3	24.3	7.1		23.8	55.2
Botwell Lane	4	34.67	21.66		6.2	62.53
Botwell Lane	4 RHS	9.5			0	9.5
Botwell Lane	5-7	59	39.6	64	0	162.6
Botwell Lane	6	34.1	31.4		0	65.5
Botwell Lane	8	32	23.39		5.8	61.19
Botwell Lane	9	35.5	84	52.55	0	172.05
Botwell Lane	10	27.69	9.53		8.64	45.86
Botwell Lane	11	53.73	1.08		0	54.81
Botwell Lane	12	27.9	25.9		0	53.8
Botwell Lane	13	57.6	39.5	52.3	0	149.4
Botwell Lane	14	27.9	1.6	33.4	10.9	73.8
Botwell Lane	18	30.4	33		14.6	78
Botwell Lane	21	24.6	22.9	17.4	0	64.9
Botwell Lane	23	21.8	10.4		22	54.2
Botwell Lane	25-27	41.7	42.1		40.4	124.2
East Avenue	1-5	116.08	63.83		92.6	272.51
East Avenue	7	33.18	33.18	4.67	2.84	73.87
East Avenue	8	19.5	8.9		0	28.4
East Avenue	9	33.8	31.1		3.2	68.1
East Avenue	11	25.3	39.5		5.2	70
East Avenue	12	20.2	15.8		0	36
East Avenue	13	33.5	30.8		11.4	75.7
East Avenue	15	39.3	25.2		2.4	66.9
East Avenue	22	15.2	25.3	3.4	0	43.9
East Avenue	82-82A	22.4			0	22.4
East Avenue	84	15.4	10.5		0	25.9
East Avenue	86	18.7	15.6		44.8	79.1
East Avenue	88	26.68	44.5	34.07	12	117.25
East Avenue	90	20.3	13.6		4.1	38
Broadway Parade	1, 2-3	22.9	22.3		109	154.2
Broadway Parade	2	29.5	23		0	52.5
Broadway Parade	4	31.6	11.19		0	42.79
Broadway Parade	5	33.3	9.2		28.9	71.4
Broadway Parade	6	33	8.5		1	42.5
Broadway Parade	7	29.46	33.86	21.4	8.8	93.52
Broadway Parade	8	31.6	33	35.7	20.4	120.7
Broadway Parade	9	32.3	29.9	15.9	1.6	79.7
Broadway Parade	12	20.03	19.79	13.1	11.99	64.91
Broadway Parade	13	37.5	36.6	50.5	55.8	180.4
Broadway Parade	14	33.3	9.4		42.7	85.4
Broadway Parade	15	32.4	20	8.2	65.9	126.5
Broadway Parade	18	37	34.3	52.1	0	123.4
Broadway Parade	19	36.8	15.8		64.6	117.2
Broadway Parade	12C	10.93	12.63		13.67	37.23

ALL UNITS

Street	Number	Zone A	Zone B	Zone C+	Storage etc	Total
Broadway Parade	16-17	76.11	32.7		55	163.81
Broadway Parade	20-21A	79.4	35.9		100.6	215.9
Broadway Parade	3 Unit 1	9.14	14.24		0	23.38
Broadway Parade	3 Units 2-3	13.71	25.93		0	39.64
Coldharbour Lane	1	86.5	31.8	30.8	0	149.1
Coldharbour Lane	2-6	110.6	90.2	18.3	139.4	358.5
Coldharbour Lane	3	23.18	3.74		9.68	36.6
Coldharbour Lane	3A	33.36	7.59		33.94	74.89
Coldharbour Lane	5	30.1	26.6	32.3	19.9	108.9
Coldharbour Lane	7	30.9	26.8	11.1	0	68.8
Coldharbour Lane	9	34.18	13.24		12.9	60.32
Coldharbour Lane	10-12	66	70.2		53.5	189.7
Coldharbour Lane	11	27.11	25.58	26.9	0	79.59
Coldharbour Lane	13	41.2	41.8	49.8	115.7	248.5
Coldharbour Lane	14	19.3	19.1	1.3	35.8	75.5
Coldharbour Lane	15	26.1	3.5		47.5	77.1
Coldharbour Lane	16	43.8	44.1	54.01	8.31	150.22
Coldharbour Lane	17	23.9	4.4		2.8	31.1
Coldharbour Lane	18-20	34.8	26.2		35.1	96.1
Coldharbour Lane	19	25.1	3.9		0	29
Coldharbour Lane	21L	20.22	5.29		10.52	36.03
Coldharbour Lane	21R	8.76			0	8.76
Coldharbour Lane	22	36.4	26.9	0.2	14.3	77.8
Coldharbour Lane	24	35.6	31.4	0.7	9.6	77.3
Coldharbour Lane	26	29.3	10.6		31.4	71.3
Coldharbour Lane	28	29.2	22	2.4	10.3	63.9
Coldharbour Lane	30	312	8.9		17.9	338.8
Coldharbour Lane	31	32	13.9		15.6	61.5
Coldharbour Lane	32	24.2	22.1	1.9	19.1	67.3
Coldharbour Lane	33 Unit 1	24.92	9.44		0	34.36
Coldharbour Lane	33 Unit 2	19.26			0	19.26
Coldharbour Lane	33 Unit 3	10.3			0	10.3
Coldharbour Lane	33 Unit 4	8.77			0	8.77
Coldharbour Lane	33 Unit 5	5.07			0	5.07
Coldharbour Lane	34	26.6	16.7		22	65.3
Coldharbour Lane	35 Unit D4	11.6			0	11.6
Coldharbour Lane	35 Unit D5	23.03			0	23.03
Coldharbour Lane	35 Units D1-D3	18.42	9.91		0	28.33
Coldharbour Lane	36	26	14.7		14.4	55.1
Coldharbour Lane	37 Unit 1	10.3			0	10.3
Coldharbour Lane	37 Unit 2	4.6			0	4.6
Coldharbour Lane	37 Unit 3	23.73	12.27		0	36
Coldharbour Lane	37 Unit 4	11.2			0	11.2
Coldharbour Lane	37 Unit 5	12.6	14.26	20.41	3.44	50.71
Coldharbour Lane	38	51	33.4		55.8	140.2
Coldharbour Lane	39-41	33.12	66.13	3.27	69.57	172.09
Coldharbour Lane	40 Unit 1	7.4			0	7.4
Coldharbour Lane	40 Unit 2	7.54			0	7.54
Coldharbour Lane	40 Unit 7	25.15			0	25.15
Coldharbour Lane	40 Units 3&5	15.29			0	15.29
Coldharbour Lane	40 Units 4 & 6	15.29			0	15.29
Coldharbour Lane	41 Units 1-2	14.19			0	14.19
Coldharbour Lane	41 Units 3&4	13.75			0	13.75
Coldharbour Lane	42-44	69.7	70.06	46	47.05	232.81
Coldharbour Lane	43	27.3	13.6	14.4	56.6	111.9
Coldharbour Lane	46	28.8	30		7.4	66.2
Coldharbour Lane	47	27.8	15.9		63.3	107
Coldharbour Lane	48	34.8	30.3		0	65.1
Coldharbour Lane	49	28.5	15.8		18	62.3
Coldharbour Lane	50	33.38	18.21		39.82	91.41
Coldharbour Lane	51	33.2	32.9	31.9	10.5	108.5
Coldharbour Lane	53	31.3	31.3	16.4	0	79
Coldharbour Lane	54	28.79	22.65		0	51.44
Coldharbour Lane	55-57	31.3	30.5		2.9	64.7
Coldharbour Lane	56	29.3	29.5	26.7	0	85.5
Coldharbour Lane	58 Unit 1	21.6			0	21.6
Coldharbour Lane	58 Unit 2	10.6			0	10.6
Coldharbour Lane	58 Unit 3	11.55			0	11.55
Coldharbour Lane	58 Unit 4	15			0	15
Coldharbour Lane	59 Unit 1	12.38			0	12.38
Coldharbour Lane	59 Unit 2	15.38	14.1		11.9	41.38
Coldharbour Lane	60	12.8			0	12.8

ALL UNITS

Street	Number	Zone A	Zone B	Zone C+	Storage etc	Total
Coldharbour Lane	61	31.3	30.9		19.4	81.6
Coldharbour Lane	62	35.02	51.46	2.41	2.89	91.78
Coldharbour Lane	63	31.2	30.6		0	61.8
Coldharbour Lane	64-70	87.96	69.93	13.3	50.13	221.32
Coldharbour Lane	65-67	69.4	63.8		50.6	183.8
Coldharbour Lane	69	23.06	10.66		61	94.72
Coldharbour Lane	72	28	20		21.38	69.38
Coldharbour Lane	73	30.2	30.8		85.8	146.8
Coldharbour Lane	74 Unit 1	14.35	11.3		0	25.65
Coldharbour Lane	74 Unit 2	14.35	11.3		0	25.65
Coldharbour Lane	75 Unit 103	4.41			0	4.41
Coldharbour Lane	75 Unit 103	5.08			0	5.08
Coldharbour Lane	75 Unit 106	11.16			0	11.16
Coldharbour Lane	75 Units 103-105	22.32			0	22.32
Coldharbour Lane	75RHS	26.53	20.63	26.74	0	73.9
Coldharbour Lane	76 Unit 106	4.02			0	4.02
Coldharbour Lane	76	24.27	31.7		7.44	63.41
Coldharbour Lane	77	34.8	30.5	12.4	40.8	118.5
Coldharbour Lane	78	13.8			0	13.8
Coldharbour Lane	79	31.75	8.76		24.13	64.64
Coldharbour Lane	81LHS	15.05	4.45		10.7	30.2
Coldharbour Lane	81RHS	15.05	4.45		10.7	30.2
Coldharbour Lane	83	31.9	8.3		21.3	61.5
Coldharbour Lane	85 Unit 1	15.54	12.53		69.76	97.83
Coldharbour Lane	85 Unit 2	12.25	8.71		0	20.96
Coldharbour Lane	87	29.3	34.2	31.6	0	95.1
Coldharbour Lane	89	21.35	21.71	3.33	0	46.39
Coldharbour Lane	89 Unit 4	7.22			0	7.22
Coldharbour Lane	89 Units 2 & 3	12.16			0	12.16
Coldharbour Lane	91 Unit 1	12.99			0	12.99
Coldharbour Lane	91 Unit 10	19.15			0	19.15
Coldharbour Lane	91 Unit 2	16.23			0	16.23
Coldharbour Lane	91 Unit 5	12.53			0	12.53
Coldharbour Lane	91 Unit 6	15.27			0	15.27
Coldharbour Lane	91 Unit 7	14.95			0	14.95
Coldharbour Lane	91 Unit 8	15.02			0	15.02
Coldharbour Lane	91 Unit 9	12.74			0	12.74
Coldharbour Lane	91 Units 3&4	24.99			0	24.99
Coldharbour Lane	95	37.52			0	37.52
Coldharbour Lane	95 Unit 1	15.66			0	15.66
Coldharbour Lane	95 Unit 2	15.6			0	15.6
Coldharbour Lane	95 Unit 3	15.86			0	15.86
Coldharbour Lane	95 Unit 4	15.35			0	15.35
Coldharbour Lane	95 Unit 5	16.48			0	16.48
Coldharbour Lane	95 Unit 6	15.24			0	15.24
Coldharbour Lane	95 Unit 7	16.02			0	16.02
Coldharbour Lane	97	29.47	1.98		83.14	114.59
Coldharbour Lane	99 Unit 1	7.21			0	7.21
Coldharbour Lane	99 Unit 2	21.76			0	21.76
Coldharbour Lane	99 Unit 3	6.64			0	6.64
Coldharbour Lane	99 Unit 4	10.56			0	10.56
Coldharbour Lane	103	21.09	32.99	60.6	0	114.68
Coldharbour Lane	105A	25.14			49.04	74.18
Coldharbour Lane	107A	54.45	19.36		0	73.81
Coldharbour Lane	108	29.8	29.8	18.3	0	77.9
Coldharbour Lane	110	17.08	17.08	13.51	0	47.67
Coldharbour Lane	110-112	322.4			0	322.4
Coldharbour Lane	110A	12.2	12.2	9.77	0	34.17
Coldharbour Lane	112	14.64	14.64	11.64	0	40.92
Coldharbour Lane	112A	14.64	14.64	11.64	0	40.92
Coldharbour Lane	114-118	97.31	133.37	167.07	0	397.75
Coldharbour Lane	120-126 Unit 1	15.42			0	15.42
Coldharbour Lane	120-126 Unit 2	15.42			0	15.42
Coldharbour Lane	120-126 Unit 4A	11.62			0	11.62
Coldharbour Lane	120-126 Unit 4B	11.62			0	11.62
Coldharbour Lane	120-126 Unit 5	18.48			0	18.48
Coldharbour Lane	120-126 Unit 6	18.48			0	18.48
Coldharbour Lane	120-126 Unit 7	18.48			0	18.48
Coldharbour Lane	120-126 Unit 8	18.48			0	18.48
Coldharbour Lane	120-126 Units 3&4	30.84			0	30.84