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Evidence Statement in Support of a Certificate of Lawful Existing Use or Development

Site Address

18 Victoria Road and 18A Victoria Road, London N22 7XB

Local Planning Authority

London Borough of Haringey

Date

15/05/2026

Use of 18 Victoria Road and 18A Victoria Road, London N22 7XB as Two Self-Contained Flats

Introduction

1. This statement has been prepared in support of an application for a Certificate of Lawful Existing Use or Development confirming the lawful use of 18 Victoria Road and 18A Victoria Road, London N22 7XB as two self-contained residential flats.
2. The application is made on the basis that the property has been continuously occupied and operated as two separate self-contained residential units for a period substantially exceeding four years prior to 25 April 2024 and more than 10 years after this application.
3. The evidence accompanying this application demonstrates, on the balance of probability, that the subdivision and occupation of the property as two separate flats commenced during 2015-2016 and has continued continuously thereafter.
4. The evidence bundle contains contemporaneous design and construction documents, building contracts and invoices, layout drawings, sworn statutory declarations, independent neighbour corroboration, tenancy documentation, bank statements and postal records, together with long-term occupation evidence extending from 2016 to 2024.
5. Taken collectively, the evidence clearly demonstrates the existence and continuous occupation of two self-contained residential units known as 18 Victoria Road and 18A Victoria Road.

Background and Creation of the Flats

6. During 2015, plans were developed to subdivide the existing dwellinghouse into a self-contained ground floor flat and a separate upper duplex flat.
7. A contemporaneous project proposal document dated 28 May 2015 explicitly describes the intention to “divide the house into a self-contained 1-bed ground-floor flat and a 3-bed duplex”. (Appendix 1)
8. Building Notice For Conversion of a Garage into a kitchen dated 10th February 2016
9. The same document describes the physical works required to achieve subdivision, including conversion of the garage into a kitchen/dining room, conversion of the office into a bathroom, creation of a separate entrance, and closure of internal connecting doors.
10. On 12 June 2015, emails were circulated to prospective builders seeking quotations for the subdivision works. These emails again explicitly described the proposal as “divide our 5 bed house into a self-contained 1-bed ground floor flat and a 3-bed duplex”. (Appendix 2)
11. The builder correspondence also attached proposed layouts, schedules of works, kitchen layouts and frontage conversion details.
12. A formal building contract dated 26 October 2015 was subsequently entered into between Nick Rendle and Diliset Ltd for works at 18 Victoria Road. (Appendix 3)
13. The contract value exceeded £30,000 and related specifically to the subdivision and conversion works required to create two residential units.
14. Detailed schedules of works prepared by HEDI Group dated January 2016 further confirm the nature and extent of the works undertaken. (Appendix 4)
15. These works included conversion of the first-floor office into a bathroom, conversion of the garage into a kitchen/dining room, installation of

independent kitchen facilities, creation of a new front entrance, modification of internal access arrangements, and fitting of independent bathroom and shower facilities.

16. The architectural and sketch layout drawings submitted within the evidence bundle clearly illustrate both the existing and proposed subdivision layouts. (Appendix 5)
17. The drawings demonstrate the physical creation of independent living accommodation, separate kitchens, separate bathrooms, independent circulation, and physical separation between the units.
18. The conversion works were completed during late 2015 and early 2016, following which the property began operating as two self-contained flats.

Occupation and Use as Two Flats

18. Documentary evidence confirms occupation of 18A Victoria Road from at least March 2016.
19. A PayPal/eSpares receipt dated 9 March 2016 is addressed to “Andrew Rendle, 18A Victoria Road, London N22 7XB”. (Appendix 6)
20. Further independent postal evidence addressed to 18A Victoria Road includes Southern Railway correspondence dated August 2016. (Appendix 7)
21. Additional commercial delivery correspondence from Chain Reaction Cycles dated September 2016 is also addressed to 18A Victoria Road. Appendix 8)
22. These records are contemporaneous and independently generated third-party documents evidencing residential occupation of 18A Victoria Road during 2016.
23. The evidence also confirms that the two units operated independently on a day-to-day residential basis.

24. A later HSBC bank statement dated April 2019 and addressed to “Mr A J Rendle, 18A Victoria Road, London N22 7XB” demonstrates continuing occupation of the unit during this period. In addition, corresponding contemporaneous bank statements dated April 2019 and addressed to the occupants of No. 18 further confirm continued residential occupation of both units during this period (Appendices 9 and 10).
25. The evidence bundle also contains extensive affidavits/declarations from the Owners and neighbouring residents confirming the timing of the subdivision works, the existence of two self-contained flats, and continuous separate occupation since 2016.
26. These declarations are formally witnessed and dated 09/04/2026. The statutory declaration by Andrew Rendle was witnessed by Alexander Johnson, whilst the remaining statutory declarations were witnessed by Birgul Erbil, Solicitor, who is authorised to administer oaths, and therefore carry significant evidential weight.
27. Independent neighbour declarations from nearby properties further corroborate the timing of the works and long-term existence of two separate flats.
28. The declarations consistently confirm that 18A Victoria Road was occupied independently from March 2016 onwards, that the upper unit at 18 Victoria Road was occupied separately, and that the property functioned as two distinct residential units. (Appendix 11, 12, 13 & 14)

Electoral Roll, Council Tax and Utility Evidence

29. Additional evidence is provided through correspondence with London Borough of Haringey concerning council tax arrangements.

- 30. Emails dated August 2021 explicitly state that the property had been “internally divided into two units - 18a and 18”. (Appendix 15)
- 31. The same correspondence confirms that “the house is still one property with the land registry but is recorded as two separate units, 18 and 18a, on the electoral roll”.
- 32. Electoral roll registration provides particularly persuasive independent corroboration of separate residential occupation.
- 33. The evidence bundle also contains extensive utility and billing correspondence between occupiers of the respective units spanning 2021 to 2024. (Appendix 16,17)
- 34. These documents demonstrate independent occupation arrangements, apportioned utility liabilities, ongoing management between occupiers, and continued operation of the property as two separate residential units.

Tenancy and Residential Letting Evidence

- 35. Formal tenancy evidence is also included within the evidence bundle. (Appendix 18)
- 36. The documents confirm occupation of 18 Victoria Road by Daniel Hegarty and Isaac Hegarty from August 2021 onwards.
- 37. The tenancy was supported by a formal tenancy deposit protection certificate. (Appendix 19)
- 38. Estate agent marketing particulars from Hobarts Estate Agents further demonstrate the property being marketed and occupied as a distinct residential unit. (Appendix 20)
- 39. Inventory documentation prepared for the tenancy also demonstrates the independent residential functioning of the flat, including kitchen facilities, living accommodation, bathroom facilities, and bedroom accommodation.

Physical Self-Containment

40. The evidence demonstrates that both units have long functioned as self-contained flats.
41. The plans and layout drawings show that the units possess independent sleeping accommodation, kitchen facilities, bathroom facilities, and independent living accommodation.
42. The subdivision works also included closure of internal connections and reconfiguration of circulation arrangements to facilitate independent residential occupation.
43. Separate entrances and independent day-to-day living arrangements have existed continuously since 2016.

Conclusion

48. The submitted evidence demonstrates that the property was physically subdivided during 2015-2016, that two self-contained flats were created, that separate occupation commenced during 2016, and that the use has continued continuously thereafter.
49. The evidence includes contemporaneous construction records, signed contracts, layout drawings, occupation evidence, banking and postal correspondence, tenancy records, utility documentation, council tax correspondence, and statutory declarations from occupiers and neighbours.
50. Taken collectively, the evidence clearly demonstrates, on the balance of probability, that the property has operated continuously as two self-contained flats for a period substantially exceeding the statutory immunity period.
51. It is therefore respectfully requested that London Borough of Haringey grant a Certificate of Lawful Existing Use or Development confirming the lawful use of

the property as two self-contained residential flats comprising 18 Victoria Road, London N22 7XB and 18A Victoria Road, London N22 7XB.

Kind regards,

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Architectural Technologist*