

Date: 06/07/2026

**Certificate of Lawfulness (Existing Use or Development)
Existing Use as 10 Self-Contained Residential Flats (Use Class C3)**

Site Address:

10A The Broadway
London
N22 6DS

Dear Sir/Madam,

Re: Certificate of Lawfulness (Existing Use or Development)

Please find enclosed our application for a Certificate of Lawfulness (Existing Use or Development) to confirm the lawful existing use of the above property as 10 self-contained residential flats (Use Class C3).

The purpose of this application is to demonstrate that the property has been used continuously as 10 independent self-contained residential units for a period well in excess of four years prior to the submission of this application, and that the use has therefore become lawful under Section 191 of the Town and Country Planning Act 1990 (as amended).

The existing layout comprises 10 self-contained flats (Flats 1-10) arranged across the first, second and loft floors, as shown on the accompanying Existing Floor Plans.

Supporting Evidence

In support of this application, a comprehensive package of documentary evidence has been submitted to demonstrate the continuous use of the property as 10 self-contained residential flats for a continuous period exceeding four years.

The enclosed documents comprise records generated by a variety of independent sources over several years, including statutory compliance inspections, accredited energy assessments, tenancy documentation, estate management records, financial records and a Statutory Declaration from the former managing agent with first-hand knowledge of the property. These documents have been carefully collated to provide a clear and consistent history of the occupation, management and maintenance of each individual residential unit.

The evidence submitted includes:

- Electrical Installation Condition Reports (EICRs) for each individual flat;
- Energy Performance Certificates (EPCs) for each individual flat;
- Tenancy Agreements for each individual flat;
- Fire Alarm Inspection and Servicing Reports for each individual flat;
- Fire Alarm Inspection and Servicing Reports for the communal areas;
- Emergency Lighting Periodic Inspection Reports for the communal areas covering a continuous period exceeding four years;
- Client bank statements evidencing the receipt of rental income for each residential unit; and
- A Statutory Declaration from the former Managing Partner of Locus Hackney Ltd confirming the long-established use and management of the property as 10 self-contained residential flats.

Whilst no single document is relied upon in isolation, the evidence should be considered collectively. The consistency between the tenancy agreements, statutory inspection records, Energy Performance Certificates, rental payment records and the accompanying Statutory Declaration provides a comprehensive and reliable body of evidence demonstrating the continuous occupation and management of the property as 10 self-contained residential flats throughout the relevant period.

Flat Numbering Clarification

During our review of the historical management documents, it became apparent that some of the supporting evidence refers to the flats using letters (A–J) rather than numerical flat numbers.

For clarity, the equivalent flat references are as follows:

Flat Number	Letter Reference
Flat 1	Flat A
Flat 2	Flat B
Flat 3	Flat C
Flat 4	Flat D
Flat 5	Flat E
Flat 6	Flat F
Flat 7	Flat G
Flat 8	Flat H
Flat 9	Flat I
Flat 10	Flat J

Accordingly, any documents referring to Flats A–J relate directly to Flats 1–10 respectively.

Tenancy Agreements and Rental Payments

The tenancy agreements enclosed within this submission were prepared and managed by Locus Estate Agents.

The accompanying client bank statements evidence receipt of rental income relating to each individual flat.

The bank statements show payments made from:

- ENKI Estates Ltd, which was the managing company and bank account used during the earlier management period; and subsequently
- Mavi Estates Limited, which began collecting and transferring rental income during 2024 following changes to the management arrangements.

Although the transferring company name changes over time, the payment references consistently identify:

- 10 Broadway
- together with the individual flat number,

thereby clearly linking each rental payment to the relevant residential unit at the application property.

These documents demonstrate uninterrupted residential occupation regardless of the change in managing company.

Planning History

The planning history demonstrates the gradual evolution of the property over several decades. Earlier planning permissions authorised a smaller number of residential units within the building, with the most recent planning permission allowing for four self-contained flats.

The purpose of this application is not to seek planning permission for the existing arrangement of ten flats. Rather, it seeks to establish that the current use of the property as 10 self-contained residential flats has become lawful through the passage of time, having been in continuous existence for a period exceeding four years prior to the submission of this application.

The planning history is provided below for completeness and to assist the Local Planning Authority in understanding the evolution of the property.

Reference	Proposal	Decision	Decision Date
OLD/1960/0085	Installation of new shop front	Approved with Conditions	08/04/1960
OLD/1959/0071	Installation of new shop front	Approved with Conditions	03/12/1959
OLD/1987/0155	Conversion into two self-contained flats	Approved with Conditions	10/07/1987
HGY/2015/0289	Change of use from A1 shop to A3 restaurant, merger of two units into one, erection of rear extension, relocation of extraction flue, staircase and new shopfronts	Approved with Conditions	29/06/2015
HGY/2017/0098	Extension to previously approved rear extension	Approved with Conditions	07/02/2017
HGY/2017/1098	Two-storey rear extension and conversion to provide four self-contained dwellings	Refused	26/04/2017
HGY/2018/3360	Two-storey rear extension and rear dormer to provide 3 self-contained dwellings with associated alterations	Approved with Conditions	25/03/2019
HGY/2019/1414	Approval of details pursuant to Condition 4 (Cycle Parking)	Approved with Conditions	21/06/2019
HGY/2020/1170	First floor rear extension and skylights	Refused	23/06/2020
HGY/2020/1241	Rear dormer enlargement, skylight and alterations to provide 4 flats	Approved with Conditions	21/08/2020
HGY/2020/2962	First and second floor extensions and alterations to improve mix of units	Approved with Conditions	26/10/2021
HGY/2022/2105	Rear extension to provide studio flat and restaurant alterations	Refused	14/11/2022
HGY/2023/1089	Two-storey rear extension to provide an additional bedroom	Approved with Conditions	16/06/2023

Statutory Declaration

In addition to the documentary evidence submitted, we have enclosed a Statutory Declaration made by Mr Aziz Kara, former Managing Partner of Locus Hackney Ltd, who personally managed the property during the relevant period.

Within his declaration, Mr Kara confirms that:

- Locus Hackney Ltd managed all 10 residential flats at 10A The Broadway, London, N22 6DS.
- The property comprised 10 independently occupied self-contained residential units.
- Each flat contained its own bedroom, bathroom and open-plan kitchen/living area.
- Each unit operated independently as a self-contained dwelling, with no shared living accommodation between the flats.

- The declaration is based upon his own direct knowledge and personal management of the property throughout the relevant period.

The declaration has been formally made under the Statutory Declarations Act 1835 before an independent solicitor and is submitted as corroborative evidence from a person with first-hand knowledge of the property's long-established use and management.

This declaration should be read alongside the tenancy agreements, Electrical Installation Condition Reports, Fire Alarm Inspection and Servicing Reports, Emergency Lighting Periodic Inspection Reports, Energy Performance Certificates, bank statements and the remaining supporting documentation enclosed with this application. Collectively, these documents provide a consistent and comprehensive body of evidence demonstrating the continuous use of the property as 10 self-contained residential flats throughout the relevant period.

Existing Lawful Use

The planning history demonstrates that earlier planning permissions authorised a lower number of residential units within the building. However, the purpose of this application is not to seek planning permission for the existing arrangement of ten flats, but rather to establish that the current use has become lawful through the passage of time under Section 191 of the Town and Country Planning Act 1990 (as amended).

The evidence submitted with this application has been carefully selected to demonstrate continuous occupation and management of the property as 10 independent self-contained residential flats for a period substantially exceeding four years prior to the submission of this application.

The enclosed documentation originates from a number of independent and reliable sources, including statutory inspection contractors, accredited EPC assessors, estate agents, financial records and a Statutory Declaration provided by the former managing partner of the managing estate agency, who had direct knowledge of the property throughout the relevant period. Collectively, these documents provide a comprehensive and consistent record of the property's long-established residential use.

These documents have been generated independently over a number of years in the ordinary course of managing and maintaining the property and are not documents created solely for the purpose of this application.

Furthermore, the statutory inspection certificates submitted for each individual flat, together with the communal fire alarm and emergency lighting inspection reports, provide additional independent evidence that each flat has been separately occupied and managed as an individual residential unit throughout the relevant period.

When considered collectively, the enclosed evidence provides a clear, consistent and compelling record of the property's long-established use as 10 self-contained residential flats. On the balance of probabilities, it demonstrates that this use has subsisted continuously for a period well in excess of four years prior to the submission of this application.

It is therefore respectfully submitted that the existing use of the property is lawful under Section 191 of the Town and Country Planning Act 1990 (as amended), and we respectfully request that a Certificate of Lawfulness (Existing Use or Development) be granted.

Should you require any further information or clarification in support of this application, please do not hesitate to contact me.

Yours sincerely,



Ms. Aygul Boyraz
Founder