

Design Statement

Pool House at 3 St Edmunds Avenue, Ruislip



Document Details

Project Name Outbuilding to accommodate Pool and Hydrotherapy facilities at 3 St Edmund's Avenue, Ruislip

Project Number 06524

Document Title Design Statement

Date Created 10/03/2025

Revisions	Issue	Notes	Date
-		Original Issue	19/03/2025
A		Section added regarding engineering works and PD rights	24/06/2025



Photograph of Rear Garden

Introduction

This design statement supports a proposed outbuilding to accommodate a pool and hydrotherapy facilities at 3 St Edmunds Avenue, Ruislip.

In 2022, planning consent was granted for the erection of an outbuilding for these facilities (Ref: 66891/APP/2022/594). The approved scheme incorporated a basement to house the associated plant equipment. This design required extensive excavation, to create a basement and that presents health and safety concerns over day to day maintenance processes and during construction.

In 2024, following the passing of the previously appointed architect, HB Architects were engaged to advance the project. Their objective was to improve buildability and cost efficiency for the Client, a protected person.

This application seeks a lawful development certificate for the redesigned proposal—relocating the plant equipment to ground level—falls under permitted development (PD) rights.

This statement should be read in conjunction with the following documents:

- 06524-HBA-DR-0101-Site Location Plan
- 06524-HBA-DR-0102-Existing Site/Block Plan
- 06524-HBA-DR-0103-Existing Site Sections
- 06524-HBA-DR-0104-Proposed Site Plan
- 06524-HBA-DR-0105-Proposed Plans
- 06524-HBA-DR-0106-Proposed Elevations and Sections
- 06524-HBA-DR-0107-Proposed Site Sections
- Arboricultural Impact Assessment by Trevor Heaps Arboricultural Consultancy Ltd.

Site Location & Existing Use

The site is the rear garden of 3 St Edmunds Avenue, Ruislip, HA4 7XW, a residential area within walking distance of Ruislip High Street and local amenities.

Currently, the garden serves as an amenity space for the main house. It is enclosed by close-board fencing, with dense foliage along the eastern boundary providing natural screening. The front garden includes off-road parking and a landscaped area.



Aerial View of Site

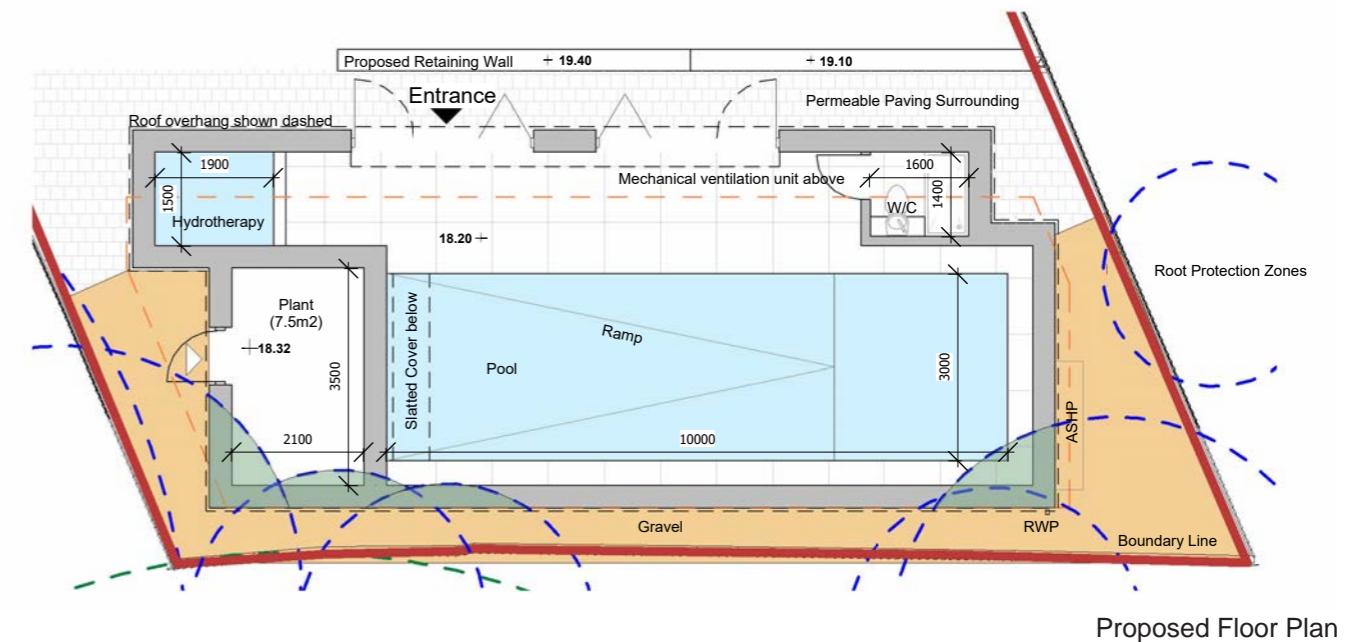
Proposal

The proposal retains the same use as the approved scheme, incorporating a pool, hydrotherapy facilities, associated plant space, and a WC ancillary to its use.

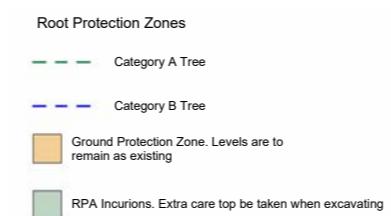
Proposed floor areas:

- Gross Internal Area (GIA): 69.3m²
- Gross External Area (GEA): 83.7m²

The proposed alterations to the footprint do not impact the constraints relating to the Arboricultural Report with Root Protection Area Incursions remaining the same as the approved scheme.



Proposed Floor Plan



Planning Context

As mentioned in the introduction this application seeks a lawful development certificate that the redesigned proposal—relocating the plant equipment to ground level—falls under permitted development (PD) rights. In the Town & Country Planning Order, Schedule 2 Part 14, Class J.

Permitted development

E. The provision within the curtilage of the dwellinghouse of—

- (a) any building or enclosure, swimming or other pool required for a purpose incidental to the enjoyment of the dwellinghouse as such, or the maintenance, improvement or other alteration of such a building or enclosure; or
- (b) a container used for domestic heating purposes for the storage of oil or liquid petroleum gas.

Development not permitted

E.1 Development is not permitted by Class E if—

- (a) permission to use the dwellinghouse as a dwellinghouse has been granted only by virtue of Class [F1 G,] M, [F2 MA,] N, P [F3, PA] or Q of Part 3 of this Schedule (changes of use);
- (b) the total area of ground covered by buildings, enclosures and containers within the curtilage (other than the original dwellinghouse) would exceed 50% of the total area of the curtilage (excluding the ground area of the original dwellinghouse);
- (c) any part of the building, enclosure, pool or container would be situated on land forward of a wall forming the principal elevation of the original dwellinghouse;
- (d) the building would have more than a single storey;
- (e) the height of the building, enclosure or container would exceed
 - (i) 4 metres in the case of a building with a dual-pitched roof,
 - (ii) 2.5 metres in the case of a building, enclosure or container within 2 metres of the boundary of the curtilage of the dwellinghouse, or
 - (iii) 3 metres in any other case;
- (f) the height of the eaves of the building would exceed 2.5 metres;
- (g) the building, enclosure, pool or container would be situated within the curtilage of a listed building;
- (h) it would include the construction or provision of a verandah, balcony or raised platform;
- (i) it relates to a dwelling or a microwave antenna; F4 ...
- (j) the capacity of the container would exceed 3,500 litres [F5; on]

[F6(k) the dwellinghouse is built under Part 20 of this Schedule (construction of new dwellinghouses).]

E.2 In the case of any land within the curtilage of the dwellinghouse which is within—

- (a) an area of outstanding natural beauty;
- (b) the Broads;
- (c) a National Park; or
- (d) a World Heritage Site,

development is not permitted by Class E if the total area of ground covered by buildings, enclosures, pools and containers situated more than 20 metres from any wall of the dwellinghouse would exceed 10 square metres.

E.3 In the case of any land within the curtilage of the dwellinghouse which is article 2(3) land, development is not permitted by Class E if any part of the building, enclosure, pool or container would be situated on land between a wall forming a side elevation of the dwellinghouse and the boundary of the curtilage of the dwellinghouse.

Interpretation of Class E

E.4. For the purposes of Class E, "purpose incidental to the enjoyment of the dwellinghouse as such" includes the keeping of poultry, bees, pet animals, birds or other livestock for the domestic needs or personal enjoyment of the occupants of the dwellinghouse.

Permitted Development Justification

We believe the proposal falls under permitted development rights as per Class E – Buildings etc. within the curtilage of a house, which allows for a building or swimming pool required for incidental purposes.

The proposal meets the general permitted development order in the following ways with are lettered in conjunction with the legislation on the previous page.

E. The proposed pool house is within the curtilage of an existing dwellinghouse and is for a purpose incidental to the enjoyment of the dwellinghouse.

E.1

- (A) The main house was not granted dwelling use under Class M, N, P, PA, or Part 3 of the schedule. No known Article 4 directions restrict PD rights.
- (B) The proposed footprint covers 19.3% of the site area (434.3m² excluding the main house), well within the 50% threshold.
- (C) The building is not positioned forward of the principal elevation of the original dwelling.

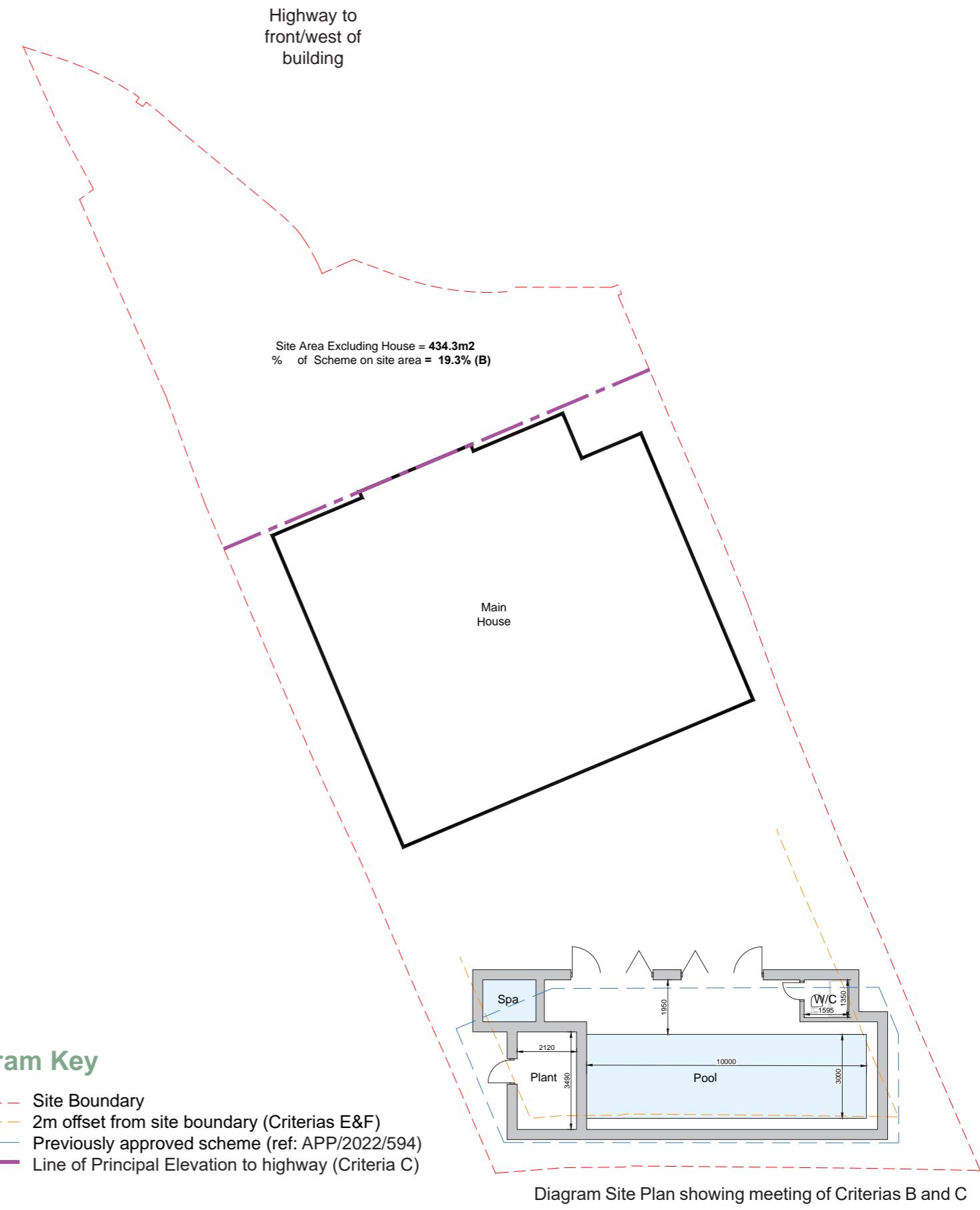


Diagram Key

- Site Boundary
- 2m offset from site boundary (Criteria E&F)
- Previously approved scheme (ref: APP/2022/594)
- Line of Principal Elevation to highway (Criteria C)

Permitted Development Justification Continued

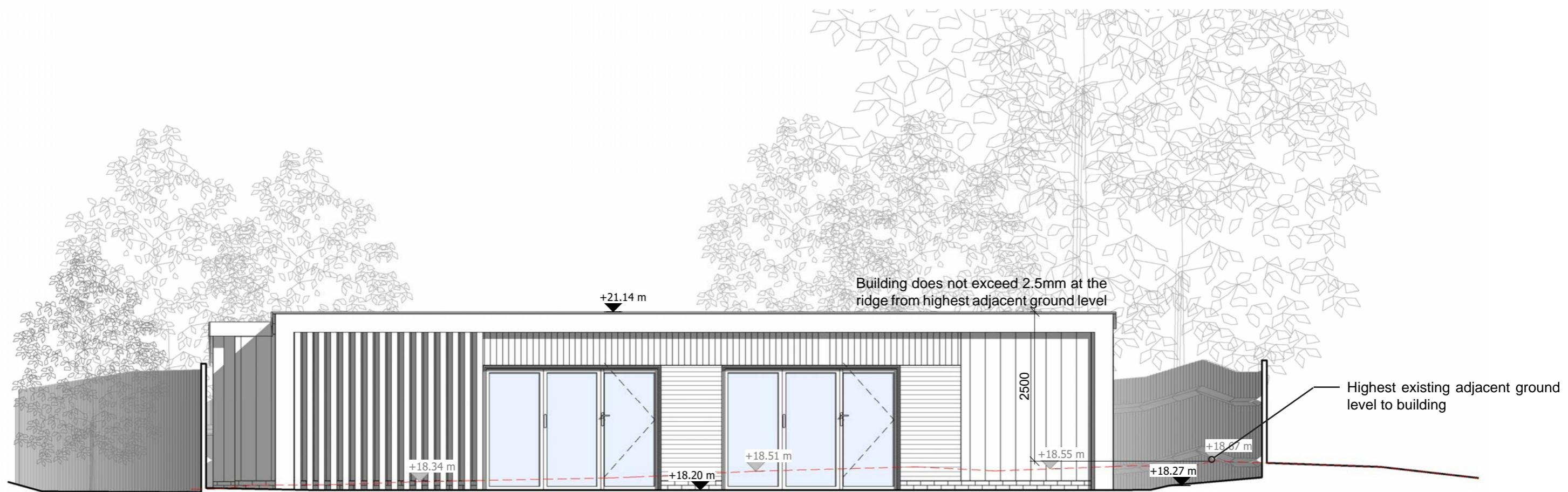
- (D) The building is single-storey.
- (E & F) The proposed monopitch roof does not exceed 2.5m in height from the highest immediate ground level. The footprint is within 2m of the boundary, adhering to the 2.5m height limit.
- (G) The building is not within the curtilage of a listed property.
- (H) No verandas, balconies, or raised platforms are included.
- (I) The proposal does not involve a dwelling or microwave antenna.
- (J) No containers exceeding 3,500 litres are proposed.
- (K) The dwellinghouse is built under Part 20 of the Town and Country Planning Regulations 2020

E.2 & E.3

- The Site is not located within an AONB, the Broads, a National Park or a World Heritage Site.

E.3

- The pool satisfies the requirement that the use purpose is incidental to the enjoyment of the dwellinghouse.



Elevation indicating highest adjacent ground level to building and height in accordance with criteria E and F

Permitted Development Justification Continued

The proposed development incorporates modest and carefully considered alterations to the existing ground levels to facilitate safe, level access to the proposed pool house. These changes have been designed to ensure a minimal visual and physical impact on the site, and to avoid any disturbance to existing trees or their root protection areas, to the rear of the garden.

To enable a level threshold into the pool house, a change in ground level of over 300mm is required along its immediate frontage. This level change is confined to a small area adjacent to the outbuilding and will be supported by a low retaining wall, designed to ensure slope stability.

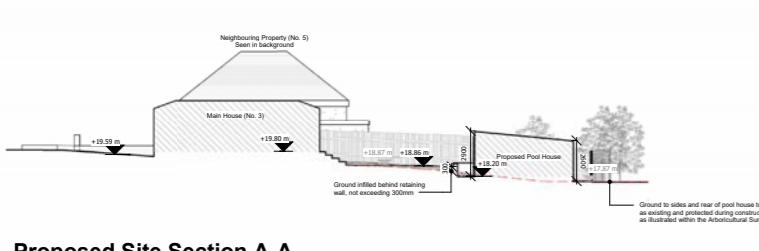
Beyond this, ground levels will be sensitively regraded across the remainder of the garden using a gradual slope, ensuring that no more than 300mm of cut or fill is used at any one point. This approach avoids the need for substantial earthworks and maintains the existing garden character.

Overall, the extent of earth movement has been deliberately limited and is proportionate to the scale of the development, with all works carefully designed to fall within the scope of permitted development rights incidental to the engineering operations necessary to implement the proposed scheme.

While engineering operations such as land regrading are not explicitly listed within Schedule 2, Part 1, Class E of the General Permitted Development Order (GPDO) 2015 (as amended), case law and appeal decisions have consistently recognised that modest and incidental engineering works undertaken conjunction with a permitted development can themselves be treated as permitted, provided they do not constitute a separate or materially different form of development.

In this case, the proposed groundworks are:

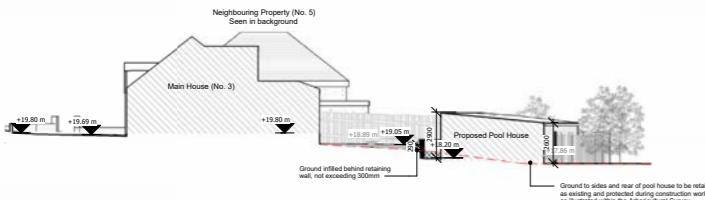
- Minor in scale, and would not materially affect the character or use of the land.
- Functionally and physically necessary to enable safe and level access to the permitted outbuilding.
- Designed to avoid excessive fill, maintaining levels in a way that preserves amenity and visual appearance.
- Consistent with thresholds referenced in the GPDO (e.g. the 300mm height limitation for raised platforms) as a benchmark for what constitutes minor land alteration in residential contexts.



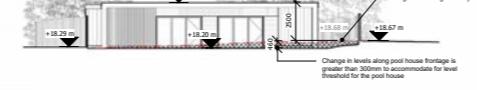
Proposed Site Section A-A



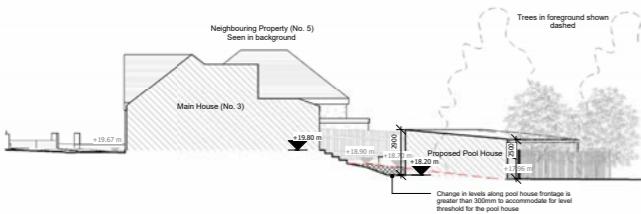
Key Plan
1:500



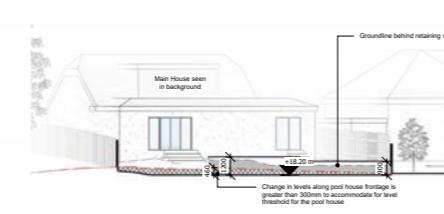
Proposed Site Section B-B



Proposed Site Section D-D



Proposed Site Section C-C



Proposed Section E-E



Conclusion

To the best of our knowledge, the revised pool house design complies with permitted development rights, as outlined above. The proposal simplifies the approved scheme, enhancing buildability and cost-efficiency while providing the client with essential facilities for long-term physical and mental well-being.

