

AtkinsRéalis



Planning Statement

Ministry of Housing, Communities and Local
Government

April 2026

100122279-ATR-XX-PL-0001

GRENFELL TOWER

Notice

This document and its contents have been prepared and are intended solely as information for Ministry of Housing, Communities and Local Government and use in relation to support a non-urgent Crown Development planning application.

AtkinsRéalis UK Limited assumes no responsibility to any other party in respect of or arising out of or in connection with this document and/or its contents.

This document has 32 pages including the cover.

Document history

Document title: Planning Statement

Document reference: 100122279-ATR-XX-PL-0001

Revision	Purpose description	Originated	Checked	Reviewed	Authorised	Date
0.1	For Review	HA	JB	MPH	KM	18/03/2026
0.2	For Client Review	HA	JB	MPH	KP	02/04/2026
0.3	For Client Review	HA	JB	MPH	KP	09/04/2026
1.0	For Issue	HA	JB	MPH	KM	15/04/2026
1.1	For Issue	HA	JB	MPH	KM	23/04/2026

Client signoff

Client	Ministry of Housing, Communities and Local Government
Project	GRENFELL TOWER
Job number	100122279
Client signature/date	MHCLG 28/04/2026



Contents

1.	Introduction.....	5
1.2	The Proposed Scheme	6
1.3	Future Proposal.....	6
1.4	Structure of this Planning Statement	6
1.5	Supporting Documents.....	7
2.	Site Context.....	8
2.1	Site Description	8
2.2	Surrounding Environment	8
2.3	Planning History	9
3.	Pre-Application Engagement	12
3.2	EIA Screening	13
4.	Planning Policy.....	14
4.2	National Planning Policy	14
4.3	Regional Planning Policy	16
4.4	Local Planning Policy.....	17
5.	Planning Considerations	19
5.2	Principle of Development	19
5.3	Air Quality and Dust	20
5.4	Ecology.....	21
5.5	Biodiversity Net Gain.....	21
5.6	Carbon.....	22
5.7	Noise and Vibration.....	24
5.8	Landscape.....	25
5.9	Transport.....	26
5.10	Flood Risk and Drainage.....	26
5.11	Historic Environment.....	27
6.	Conclusion.....	28

Tables

Table 1-1 - Supporting Drawings	7
Table 1-2 - Supporting Documents.....	7
Table 2-1 - The Site's Planning History	9



Figures

Figure 2-1 – Site Context (Source: Google Maps, 2026) 9



1. Introduction

- 1.1.1 This Planning Statement (hereby referred to as the ‘Statement’) has been prepared by AtkinsRéalis on behalf of our client, the Ministry of Housing, Communities and Local Government (MHCLG) (the ‘Applicant’), to support a non-urgent Crown Development application for full planning permission in respect of Grenfell Tower, Grenfell Road, North Kensington, London, W11 1TG (the ‘Site’). The 0.51-hectare (ha) Site is located within the Royal Borough of Kensington and Chelsea.
- 1.1.2 The Site is now classified as ‘Crown land’, that is to say land in which MHCLG has a relevant interest. MHCLG and the Secretary of State are responsible for its maintenance.
- 1.1.3 The Proposed Scheme responds to the Grenfell Tower fire, which caused significant structural damage to Grenfell Tower (the ‘Tower’). Despite extensive propping to maintain its stability, the Tower’s structural integrity has declined and would continue to deteriorate the longer it remains in place. The advice from independent expert engineers was to carefully take down the Tower¹. MHCLG is, therefore, acting in the public interest and for public safety by taking down the Tower.
- 1.1.4 This application for Crown Development is submitted pursuant to section 293D of the Town and Country Planning Act 1990 (as amended). The application does not meet the criteria for ‘major development’, as listed in Article (2) of The Town and Country Planning (Development Management Procedure) (England) Order 2015². Therefore, the application is a ‘minor development’ application.
- 1.1.5 MHCLG’s Principal Contractor is carefully and sensitively taking down Grenfell Tower. These works are being conducted under permitted development (PD) rights granted to the Applicant by Schedule 2 of The Town and Country Planning General Permitted Development (England) Order 2015³ (GPDO), specifically, Part 19 ‘*Development by the Crown or for national security purposes*’ Class Q ‘*development by the Crown relating to an emergency*’. Class Q states:
- “Q. Development by or on behalf of the Crown on Crown land for the purposes of—*
- (a) preventing an emergency;*
- (b) reducing, controlling or mitigating the effects of an emergency; or*
- (c) taking other action in connection with an emergency”.*
- 1.1.6 MHCLG has, therefore, confirmed that the use of the PD rights outlined in Schedule 2 Part 19 Class Q applies to this Site. However, as the PD rights can no longer be relied upon after 12 months (as stated by the conditions of the PD rights), this application aims to secure the necessary consent to complete the works, noting this does not include the basement. Notification to utilise these PD rights was issued by MHCLG on the 23rd September 2025. Consequently, the 12-month period ends on 23rd September 2026.

¹ https://assets.publishing.service.gov.uk/media/67630030ff2c870561bde83e/Grenfell_Tower_-_update_to_structural_engineering_advice_-_Redacted.pdf

² <https://www.legislation.gov.uk/ukxi/2015/595/article/2/made>

³ <https://www.legislation.gov.uk/ukxi/2015/596/schedule/2>



1.2 The Proposed Scheme

- 1.2.1 The Proposed Scheme comprises the works to carefully and sensitively take down Grenfell Tower. The basement will be retained and protected with a waterproof topping. An access point will be provided to ensure safe access into the existing (retained) basement.
- 1.2.2 The non-urgent Crown Development application for full planning permission is sought for the following description of development:
- “The works to take down Grenfell Tower”.*
- 1.2.3 The sensitive works to carefully take down Grenfell Tower are being carried out using the best practicable means, in accordance with BS:6187:2011 and the Code for Demolition at all times. This includes specialist deconstruction equipment, diamond drilling and wire sawing, coupled with traditional deconstruction methods. All works are supported by a luffing jib tower crane located to the north-east of the building.
- 1.2.4 Larger building elements, including columns, spandrel panels/deep beams, roof-level crown and sections of the existing floor slab, are wire-sawn, detached, lifted down with the crane, then removed from the Site to suitable storage or laid to rest. Smaller materials are transported vertically within the structure, brought out using bobcat shovels, and removed from the Site to be laid to rest.

1.3 Future Proposal

- 1.3.1 As set out in Section 1.2, this non-urgent Crown Development application seeks full planning permission for the sensitive works to carefully take down Grenfell Tower, with the exception of the basement. This application does not address or provide details of the Site’s future use. However, a future planning application for the Grenfell memorial, including its details and design, will be submitted in due course.

1.4 Structure of this Planning Statement

- 1.4.1 This Statement comprises the following sections:
- **Section 2** provides a description of the Site and the surrounding area, and includes details of the Site’s planning history;
 - **Section 3** provides an overview of the pre-application engagement;
 - **Section 4** outlines planning policy, which is of relevance to the Proposed Scheme;
 - **Section 5** provides an assessment of planning considerations against planning policy; and
 - **Section 6** concludes the Statement.



1.5 Supporting Documents

1.5.1 The following drawings are submitted in support of this application:

Table 1-1 - Supporting Drawings

Drawing Number	Drawing Title	Revision Number
100122279-AR-XX-00-DR-A-02100	Site Location Plan	P01
100122279-AR-XX-00-DR-A-02102	Existing Site Plan	P01
100122279-AR-XX-00-DR-A-90100	Existing Ground Floor Plan	P03
100122279-AR-XX-00-DR-A-90102	Proposed Ground Floor Plan	P01
100122279-AR-XX-01-DR-A-90101	Existing First Floor Plan	P03
100122279-AR-XX-ZZ-DR-A-90200	Existing Elevations (1 of 2)	P03
100122279-AR-XX-ZZ-DR-A-90201	Existing Elevations (2 of 2)	P03

1.5.2 The following documents are also submitted in support of this application:

Table 1-2 - Supporting Documents

Document Number	Document Name	Revision Number
EEMC-AQR-001-201	Air Quality and Dust Assessment	Rev06
100122279-ATR-XX-EC-0002	Biodiversity Net Gain Baseline Report	1.3
100122279-ATR-XX-EC-0003	Biodiversity Net Gain – The Statutory Metric 1.0.4	V1.0
100122279-ATR-XX-PL-0003	Cover Letter	N/A
100122279-ATR-XX-HE-0001	Historic Environment Assessment	3.0
EEMC-PPAR001-201	Noise and Vibration Assessment	Rev05
100122279-ATR-XX-PL-0001	Planning Statement (this document)	1.1
100122279-ATR-XX-EC-0001	Preliminary Ecological Appraisal Report	3.0
100122279-ATR-XX-PL-0002	Statement of National Importance	1.1
100122279-ATR-XX-L-0001	Townscape and Visual Assessment	3.0
100122279-ATR-XX-TS-0001	Transport Statement	5.0



2. Site Context

2.1 Site Description

- 2.1.1 The Site is located at Ordnance Survey national grid reference TQ 23908 80963, Greater London. It is located within the Royal Borough of Kensington and Chelsea. The Site includes the site of Grenfell Tower and its associated public access areas. The Site is enclosed in a privacy barrier and external hoarding.
- 2.1.2 The Tower is currently screened in Monarflex, and access is not available to the public. The 0.51ha Site is 'Crown land' as defined in section 293 of the Town and Country Planning Act 1990, in which MHCLG has an interest. MHCLG owns the Grenfell Tower site, which comprises the majority of the land to which this application relates. The RBKC are a landowner within the application's boundary, but this does not change the status of this land as 'Crown land'. In accordance with Article (9) of the Town and Country Planning (Crown Development Applications) (Procedure and Written Representations) Order 2025, RBKC have been served notice of this application.

2.2 Surrounding Environment

- 2.2.1 The local context is mixed-use, comprising predominantly urban residential development in North Kensington, Notting Hill and Holland Park, with some educational, leisure, and commercial uses integrated into the local character. Kensington Aldridge Academy, a secondary school, is located immediately north of the Site, with residential properties, the Hammersmith & City and Circle London Underground lines, and the A40 Westway beyond. Residential properties at Verity Close and Kensington Leisure Centre are located east of the Site, with further residential dwellings beyond. Further residential areas are located to the south, including Royal Crescent and Holland Park Avenue, as well as Holland Park and Holland Park School.
- 2.2.2 The Hammersmith & City and Circle London Underground lines lie to the west of the Site, with Latimer Road Station to the southwest. A public house, convenience store, car servicing garages, and residential properties are located beyond the underground line. The A40 Westway Roundabout and the A3220 West Cross Route enclose these properties to the west. The A40 Westway dual carriageway to the north and the A3220 West Cross Route to the west separate residential areas from a retail area, including Westfield London, and the Imperial College White City campus complex further west.
- 2.2.3 The Site and the surrounding environment are shown in Figure 2-1 below.





Figure 2-1 – Site Context (Source: Google Maps, 2026)

2.3 Planning History

2.3.1 A planning history search of RBKC’s records identifies the Site’s relevant planning history. This is detailed in Table 2-1 below.

Table 2-1 - The Site’s Planning History

Application Reference	Description of Development	Decision Date	Decision
PP/00/01959	Installation of new air conditioning system on external wall to walkway.	04/10/2000	Granted subject to conditions
PP/04/00924	Erection of a bricked enclosure at ground level to contain a pump for a hydraulic lift.	09/06/2004	Granted subject to conditions
PP/12/04097	Refurbishment of existing Grenfell Tower including new external cladding and fenestration, alterations to plant room, reconfiguration of lower 4 levels to provide 7 new residential units (use class C3), replacement nursery (use class D1) and boxing club (use class D2) facilities, external public realm works, redevelopment and change of use of existing garages to refuse collection area.	10/01/2014	Granted subject to conditions

Application Reference	Description of Development	Decision Date	Decision
PP/14/03655	Change of use, nursery to residential accommodation at mezzanine level and at walkway level, change from office to residential accommodation, creating two residential units.	23/12/2014	Granted subject to conditions
NMA/14/08597/	Non-material amendment to planning permission PP/12/04097 (Refurbishment of existing Grenfell Tower including new external cladding and fenestration, alterations to plant room, reconfiguration of lower 4 levels to provide 7 new residential units (use class C3), replacement nursery (use class D1) and boxing club (use class D2) facilities, external public realm works, redevelopment and change of use of existing garages to refuse collection area) to change window sizes to be as existing, minor alterations and internal arrangements to three flats at Walkway +1 level.	02/01/2015	Accepted
CON/14/04204/	Details required by condition 11 (Construction Traffic Management Plan) of planning permission PP/12/04097 (Refurbishment of existing Grenfell Tower including, external cladding and fenestration, alterations to plant room, reconfiguration of lower four levels to provide seven residential units (use class C3), replacement nursery (use class D1) and boxing club (use class D2) facilities, external public realm works, redevelopment and change of use of existing garages to refuse collection area).	04/08/2014	Approved
CON/14/04024/	Details required by conditions 3 (samples and materials-external faces of building) and 4 (samples and materials-windows and doors) of planning permission PP/12/04097 (Refurbishment of existing Grenfell Tower including new external cladding and fenestration, alterations to plant room, reconfiguration of lower 4 levels to provide 7 new residential units (use class C3), replacement nursery (use class D1) and boxing club (use class D2) facilities, external public realm works, redevelopment and change of use of existing garages to refuse collection area.)	30/09/2014	Approved
CON/15/01274/	Details required by condition 3 (materials) of PP/12/04097 (Refurbishment of existing Grenfell Tower including new external cladding and fenestration, alterations to plant room, reconfiguration of lower 4 levels to provide 7 new residential units (use class C3), replacement nursery (use class D1) and boxing club (use class D2) facilities, external public realm works, redevelopment and change of use of existing garages to refuse collection area).	28/04/2015	Approved



Application Reference	Description of Development	Decision Date	Decision
CON/16/02852/	Details required by condition 7 (landscaping and tree/shrub planting scheme) of planning permission 12/04097 (Refurbishment of existing Grenfell Tower including new external cladding and fenestration, alterations to plant room, reconfiguration of lower 4 levels to provide 7 new residential units (use class C3), replacement nursery (use class D1) and boxing club (use class D2) facilities, external public realm works, redevelopment and change of use of existing garages to refuse collection area)	04/07/2016	Approved
CON/16/03802/	Details required by condition 5 (Cycle parking) of planning permission 12/04097(Refurbishment of existing Grenfell Tower including new external cladding and fenestration, alterations to plant room, reconfiguration of lower 4 levels to provide 7 new residential units (use class C3), replacement nursery (use class D1) and boxing club (use class D2) facilities, external public realm works, redevelopment and change of use of existing garages to refuse collection area.	08/08/2016	Approved
CON/16/04468/	Details required by Condition 6 (details of hard surfaces and lighting) of planning permission PP/12/04097 (Refurbishment of existing Grenfell Tower including new external cladding and fenestration, alterations to plant room, reconfiguration of lower 4 levels to provide 7 new residential units (use class C3), replacement nursery (use class D1) and boxing club (use class D2) facilities, external public realm works, redevelopment and change of use of existing garages to refuse collection area)	23/08/2016	Approved



3. Pre-Application Engagement

3.1.1 In accordance with the Procedural Guidance for Section 293D Crown Development applications⁴, the Applicant has conducted pre-application engagement with the following parties:

- Civil Aviation Authority;
- Crown Premises Fire Safety Inspectorate;
- Defence Infrastructure Organisation;
- Environment Agency;
- Greater London Authority;
- London City Airport;
- London Heathrow Airport;
- Natural England;
- Royal Borough of Kensington and Chelsea, in their role as the Lead Local Flood Authority;
- Royal Borough of Kensington and Chelsea, in their role as the Local Planning Authority;
- Royal Borough of Kensington and Chelsea, in their role as the Local Highway Authority;
- The Planning Casework Unit (PCU), within MHCLG; and
- Transport for London.

3.1.2 The former Deputy Prime Minister announced her decision to carefully take Grenfell Tower down to the ground in February 2025. Prior to this, the former Deputy Prime Minister met with bereaved families, survivors, and residents in the immediate community. Monthly updates, including environmental monitoring, are shared on gov.uk⁵, door-dropped to local residents, and shared with groups. These monthly updates, along with additional correspondence, have informed the community about the works to carefully take down the Tower, including how the Principal Contractor is carrying out the works. In addition, bereaved families, survivors, and the local community have been invited to attend monthly meetings with the Principal Contractor, and an extensive door-knocking campaign has been conducted in the local area.

⁴ <https://www.gov.uk/government/publications/crown-development-applications-procedural-guide/procedural-guidance-for-section-293d-crown-development-applications>

⁵ <https://www.gov.uk/government/topical-events/grenfell-community-updates>

3.2 EIA Screening

- 3.2.1 An EIA Screening letter was submitted by MHCLG to PCU (reference: PCU/EIASCR/K5600/3372396) to determine whether the Proposed Scheme met the criteria for EIA Development. On the 25th September 2025, PCU confirmed that the “*development falls within the description in column 1 of paragraph 10(b) ‘Urban Development Project’ of Schedule 2 to the 2017 Regulations but does not fall within any other description of development in Schedule 1 or 2. However, having taken into account all the submitted information, the development does not meet or exceed the applicable thresholds in column 2 of paragraph 10(b) of Schedule 2 to the 2017 Regulations. The proposal is therefore not ‘Schedule 1 development’ or ‘Schedule 2 development’, and is therefore not “EIA development”, within the meaning of the 2017 Regulations*”.



4. Planning Policy

- 4.1.1 This application for Crown Development is submitted pursuant to Section 293D of the Town and Country Planning Act 1990 (as amended). Section 293D (1) states that *‘the section applies where (a) the appropriate authority intends to make a relevant application, and (b) the authority considered that the development to which it relates is of national importance’*. Section 293D (5) states that, *‘if the Secretary of State considers the development to be of national importance, the Secretary of State must proceed to determine the application’*.
- 4.1.2 Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 require that proposals are determined in accordance with the ‘Development Plan’ unless material considerations indicate otherwise.
- 4.1.3 Other material considerations for the planning application include the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG), the London Plan, RBKC’s Local Plan and Supplementary Planning Documents (SPDs). No Neighbourhood Plans are applicable to the Site.

4.2 National Planning Policy

National Planning Policy Framework

- 4.2.1 The NPPF was revised in December 2024 (and amended in February 2025) and sets out planning policies for England and their relevant applicability⁶. Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.
- 4.2.2 Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 4.2.3 The Framework advocates a presumption in favour of sustainable development. The planning system seeks to meet the following overarching objectives:
- ***“an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;***
 - ***a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and***
 - ***an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”***.

⁶ https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

- 4.2.4 Paragraph 10 expands on this, stating that the presumption in favour of sustainable development is at the heart of the framework, ensuring that sustainable development is pursued positively.
- 4.2.5 **Chapter 8 ‘Promoting healthy and safe communities’** outlines that *‘planning policies and decisions should aim to achieve healthy, inclusive, and safe places’*. Paragraph 98 builds on this, explaining that *‘social, recreational and cultural facilities’* should be provided to meet the community’s needs, and that planning decisions should *‘b) ... improve health, social and cultural well-being for all sections of the community’*.
- 4.2.6 Paragraph 102 expands on this, stating that planning *‘decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and other hazards (whether natural or man-made), especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security. The safety of children and other vulnerable users in proximity to open water, railways and other potential hazards should be considered in planning and assessing proposals for development’*.
- 4.2.7 **Chapter 9 ‘Promoting sustainable transport’** sets out in paragraph 116 that *‘development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios’*.
- 4.2.8 **Chapter 14 ‘Meeting the challenge of climate change, flooding and coastal change’** paragraph 181 writes that *‘when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere’*.
- 4.2.9 **Chapter 15 ‘Conserving and enhancing the natural environment’** outlines that *‘decisions should contribute to and enhance the natural and local environment by: ... d) minimising impacts on and providing net gains for biodiversity’*.
- 4.2.10 **Chapter 16 ‘Conserving and enhancing the historic environment’** explains that, for proposals affecting heritage assets, *‘local planning authorities should require the applicant to describe the significance of any heritage assets affecting, including any contribution made by their setting’*.

Planning Practice Guidance

- 4.2.11 A suite of PPG documents provides further context to the NPPF, and it is intended that they are read together⁷.
- 4.2.12 Guidance is provided for ‘Crown Development and Urgent Crown Development’, explaining how planning rules apply to Crown Development in England, including special routes for nationally important and urgent Crown projects that allow applications to be determined directly by the Secretary of State rather than by local planning authorities⁸.

⁷ <https://www.gov.uk/government/collections/planning-practice-guidance>

⁸ <https://www.gov.uk/guidance/crown-development>

- 4.2.13 The PPG provides guidance on ‘Air quality’, explaining how it should be considered throughout the planning system in England. It sets out when air quality assessments are required, what impacts and risks should be assessed, including health, biodiversity, traffic and construction effects, and how developments can mitigate or improve air quality⁹.
- 4.2.14 The PPG sets out guidance on ‘Biodiversity net gain’ (BNG), which is now mandatory for most new planning permissions submitted from 12th February 2024, requiring at least a 10% measurable increase in biodiversity value compared with the pre-development baseline. It explains how BNG is applied through the planning process, including exemptions, calculation methods, the submission and approval of Biodiversity Gain Plans, and special rules for phased development and irreplaceable habitats¹⁰.
- 4.2.15 The PPG sets out the government’s guidance on how ‘Noise’ should be considered within the planning system, including when noise is relevant, how its impacts are assessed, and the thresholds used to judge adverse and significant adverse effects on health and quality of life¹¹.
- 4.2.16 The government’s guidance on ‘Travel Plans, Transport Assessments and Statements’ explains when and how these documents can be used to assess and mitigate the transport impacts of development, with the aim of promoting sustainable travel and avoiding severe transport impacts¹².

4.3 Regional Planning Policy

The London Plan 2021

- 4.3.1 The Greater London Authority (GLA) and the Mayor are required to publish a Spatial Development Strategy (SDS), known as the London Plan¹³. It sets out an integrated framework for the city’s economic, environmental, transport, and social development over the next 20-25 years. The policies of relevance to this non-urgent Crown Development application are set out below.
- 4.3.2 **Policy D14 ‘Noise’** aims to *‘reduce, manage and mitigate noise to improve health and quality of life’*.
- 4.3.3 **Policy HC1 ‘Heritage conservation and growth’** explains that *‘development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings’*.
- 4.3.4 **Policy G6 ‘Biodiversity and access to nature’** states that *‘development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain’*.
- 4.3.5 **Policy G7 ‘Trees and woodlands’** states that *‘development proposal should ensure that, wherever possible, existing trees of value are retained’*.
- 4.3.6 **Policy SI1 ‘Improving air quality’** outlines that development should not *‘a) lead to further deterioration of existing poor air quality, b) create any new areas that exceed air quality limits ... and c) create unacceptable risk of high levels of exposure to poor air quality’*. *‘To reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance’*.

⁹ <https://www.gov.uk/guidance/air-quality--3>

¹⁰ <https://www.gov.uk/guidance/biodiversity-net-gain>

¹¹ <https://www.gov.uk/guidance/noise--2>

¹² <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>

¹³ <https://www.london.gov.uk/programmes-strategies/planning/london-plan/london-plan-2021>

- 4.3.7 **Policy SI12 ‘Flood risk management’** explains that flood risk *‘should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authority, developers and infrastructure providers’*. *‘Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed’*.
- 4.3.8 **Policy T4 ‘Assessing and mitigating transport impacts’** notes that development *‘should reflect and be integrated with the current and planned transport access, capacity and connectivity’*. The policy recommends that transport assessments *‘should be submitted with development proposals to ensure that impacts on the capacity of the transport network, at the local level, network-wide level and strategic level, are fully assessed’*.

4.4 Local Planning Policy

Royal Borough of Kensington and Chelsea New Local Plan 2024

- 4.4.1 The adopted Development Plan, the New Local Plan 2024 (adopted July 2024), sets out the vision for future development in the borough over a 20-year period and includes the planning policies to help achieve this vision¹⁴. The policies of relevance to this non-urgent Crown Development application are set out below.
- 4.4.2 **Policy GB6 ‘Air Quality’** sets out that *‘all development is required to meet the air quality neutral benchmarks, in accordance with the Local Plan’*, and that an Air Quality Assessment is required for *‘development which involves significant demolition’*. In addition, a Dust Risk Assessment is required where development involves *“dusty works”* to *‘identify potential impacts and appropriate mitigation measures to protect local sensitive receptors’*.
- 4.4.3 **Policy GB7 ‘Construction Management’** states that development *‘must not create unacceptable impact on local residential amenity including neighbouring properties as a result of demolition’*.
- 4.4.4 **Policy GB8 ‘Noise and Vibration’** seeks to ensure that development avoids creating unacceptable noise impacts on existing and future occupiers. Proposals must mitigate noise at source and through design, layout, and appropriate acoustic measures to protect amenity.
- 4.4.5 **Policy GB11 ‘Flood Risk’** outlines that *‘development must address and reduce flood risk and its impacts’*.
- 4.4.6 **Policy GB14 ‘Green and Blue Infrastructure’** requires development *‘to contribute to the greening of the borough, [and] enhance habitat to increase biodiversity’*.
- 4.4.7 **Policy GB16 ‘Trees’** protects existing trees and woodland, particularly those of high amenity or ecological value. Development should retain trees wherever possible and provide appropriate replacement planting and long-term management.
- 4.4.8 **Policy CD1 ‘Context and Character’** aims to ensure that development responds positively to its surroundings, including the townscape, landscape, and heritage assets. Proposals should respect local character while allowing appropriate change.

¹⁴ <https://www.rbkc.gov.uk/media/document/new-local-plan-july-2024->

- 4.4.9 **Policy CD3 ‘Heritage Assets’** explains that *‘applications for development which affect a designated heritage asset should be based on an informed understanding of the significance of the heritage asset, including any contribution made by its setting, which is sufficient to understand the potential impact of the development on that significance’*.
- 4.4.10 **Policy CD4 ‘Heritage Assets – Conservation Areas’** requires development *‘to preserve or enhance the character or appearance and significance of the conservation area and thereby protect the special architectural or historic interest of the area’*.
- 4.4.11 **Policy CD5 ‘Heritage Assets – Listed Buildings’** requires development *‘to preserve the special architectural or historic interest and significance of listed buildings’*.
- 4.4.12 **Policy TR5 ‘Land Use and Transport’** requires *‘development to be located in suitable areas where the transport requirements can be met in a sustainable manner’*.

Supplementary Planning Guidance

- 4.4.13 RBKC have prepared several SPDs that provide detailed technical guidance to support the implementation of Local Plan policies¹⁵. The SPDs that are of relevance to the Proposed Scheme are set out below.

Air Quality SPD

- 4.4.14 This SPD sets out the Council’s requirements for reducing air pollution emissions from new development, conversions and change of use. The document emphasises that construction and demolition activities are major contributors to local air pollution, particularly through dust and vehicle emissions. It requires developers to comply with the London Councils’ Best Practice Guidance on controlling dust and emissions, following a hierarchy of prevention, suppression, and containment.

Noise SPD

- 4.4.15 The SPD describes and details the requirements with regard to planning and noise and sets out the criteria adopted to protect occupiers of new or existing noise-sensitive buildings from existing or introduced noise sources and the residential amenity of the borough. The guidance also specifies construction-related limits on noise-emitting equipment, requirements for anti-vibration mounts, and controls on noise during demolition or building works under legislation such as the Control of Pollution Act 1974.

Transport and Streets SPD

- 4.4.16 This SPD sets out how development in Kensington and Chelsea must minimise transport, servicing, parking, streetscape and construction impacts while promoting sustainable, safe, and accessible movement across the borough. It provides detailed requirements for planning applications, including transport assessments, servicing strategies, streetscape design, and robust controls on construction activity to protect highway function, pedestrian safety, amenity, and air quality.

¹⁵ <https://www.rbkc.gov.uk/planning-and-building-control/planning-policy/supplementary-planning-documents-and-guidance>

5. Planning Considerations

5.1.1 This section provides an assessment of the key planning considerations for this application.

5.2 Principle of Development

- 5.2.1 The principle of the Proposed Scheme is founded on the need to address the continued structural deterioration of Grenfell Tower and to ensure the long-term safety of the Site and the surrounding community. MHCLG, as the appropriate authority and landowner, is required to ensure that the Site does not pose a risk to public safety. Paragraph 197 of the NPPF reinforces this, stating that landowners are responsible for maintaining land and buildings in a safe condition. The controlled and sensitive works to carefully take down the Tower are therefore necessary to mitigate these risks.
- 5.2.2 MHCLG's appointed Principal Contractor is carefully and sensitively taking down Grenfell Tower under permitted development rights granted by the Town and Country Planning (General Permitted Development) (England) Order 2015, specifically Schedule 2, Part 19, Class Q, which enables development by the Crown relating to an emergency. However, these rights are time-limited to 12 months, and the works to carefully take down the Tower cannot be completed within that timeframe. As such, planning permission is required to lawfully complete the works. Planning permission to carefully take down the whole Tower is sought to ensure that all works are considered in this application.
- 5.2.3 The NPPF supports development that promotes public safety and reduces vulnerability to hazards. Paragraphs 7, 98 and 102 emphasise the importance of creating safe, healthy and resilient communities, highlighting that planning decisions should anticipate and address hazards that could affect public welfare. The works to carefully take down a structurally compromised Tower directly supports these policy objectives by proactively reducing risk to residents, local institutions, transport corridors and the wider community.
- 5.2.4 Regional policy within the London Plan 2021 also supports the principle of safely managing demolition and construction activities. Policy S11 'Improving air quality', Policy D14 'Noise' and Policy S12 'Flood risk management' require developments to demonstrate that environmental risks can be minimised through appropriate mitigation. The Proposed Scheme aligns with these policies, as demonstrated in the supporting technical assessments, which show that the works to carefully take down the Tower can proceed without unacceptable impacts.
- 5.2.5 At a local level, the RBKC New Local Plan 2024 contains similar requirements. Policy GB7 'Construction Management' and Policy GB8 'Noise and Vibration' require demolition works to avoid unacceptable impacts on neighbouring properties and sensitive receptors. The Proposed Scheme accords with these policies by adopting best practicable means, robust monitoring, and comprehensive mitigation measures. Policy CD1 'Context and Character' also requires development proposals to respond positively to their surroundings. While the proposal involves the removal of an existing structure, it does so sensitively and does not prejudice future decisions regarding the long-term use of the Site, including a future memorial.
- 5.2.6 In summary, the principle of carefully taking down Grenfell Tower is justified and policy-compliant. It responds directly to the continued structural risks posed by the existing building and reflects the responsibilities placed on MHCLG as the landowner. The proposal aligns with national, regional and local planning policy, all of which support development that ensures public safety, manages risk, and secures appropriate environmental protections.



5.3 Air Quality and Dust

- 5.3.1 An Air Quality and Dust Assessment has been prepared, focusing on the potential for dust emissions during the works to carefully take down the Tower, as well as mitigation and monitoring methods to minimise the impact of the Proposed Scheme.
- 5.3.2 PM₁₀ and PM_{2.5} are two common measures of particulate matter (PM) in air pollution. They refer to the size of tiny airborne particles that can be breathed into the human body. PM₁₀ stands for Particulate Matter with a diameter of 10 micrometres (µm) or smaller. PM_{2.5} stands for Particulate Matter with a diameter of 2.5 µm or smaller.
- 5.3.3 The assessment establishes the Site's baseline air quality using three data sources: RBKC's long-term automatic and diffusion-tube network, the UK Health Security Agency (UKHSA) monitoring at three on-site locations throughout 2024, and the contractors' dedicated three-month baseline monitoring undertaken between May and August 2025. Across all datasets, concentrations of PM₁₀, PM_{2.5}, and NO₂ were consistently below national air quality objectives, with PM₁₀ generally in the range of 10-20 µg/m³ and PM_{2.5} around 7-10 µg/m³. The Site is considered representative of "urban background" conditions, with no exceedances of relevant limit values recorded. These baseline findings provide a good baseline against which construction-related impacts can be assessed.
- 5.3.4 The study identifies sensitive receptors within close proximity to the works, including Kensington Aldridge Academy, Kensington Leisure Centre, nearby residential blocks such as Verity Close, Testerton Walk and Hurstway Walk, and the Grenfell Memorial area. Although residential units immediately adjacent to the Tower are unoccupied, the remaining receptors are highly sensitive due to their use and proximity. No ecological receptors lie within 50m of the Site. The presence of a school, leisure centre, and an active public realm means the area is categorised as high sensitivity for dust-soiling impacts and medium sensitivity for human-health impacts.
- 5.3.5 A Dust Risk Assessment following the Institute of Air Quality Management's (IAQM) 2024 methodology concludes that the works to carefully take down the Tower represent a *High Risk* activity due to the large building volume (>75,000 m³) and the nature of the works. Earthworks (only undertaken in relation to piling for the tower crane foundations) carry *Low Risk*, and trackout (deposition of debris (mud/dust) transferred from a construction site) is considered *Medium Risk*. Without mitigation, elevated dust soiling and potential increases in PM₁₀ concentrations could occur. Accordingly, extensive mitigation measures are prescribed in Table 5.3 of the assessment, including site-wide dust suppression via water mist cannons, strict traffic management, controlled HGV access, compliance with non-road mobile machinery emissions standards, hoarding and enclosure of dust-generating activities, routine site inspections, stakeholder communication protocols, and active incident/complaint procedures. It is considered that with the extensive mitigation measures in place, the risk will be much lower and should not be cause for concern.
- 5.3.6 The Monitoring Plan sets out a robust real-time PM₁₀ and PM_{2.5} regime using five air quality monitors located around the Site, sited with regard to the prevailing south-westerly wind and receptor proximity. Instruments provide continuous data with automated alerting at defined trigger (e.g., PM₁₀ at 150 µg/m³ over 15 minutes) and action levels (e.g., PM₁₀ at 190 µg/m³ over one hour). Exceedances require immediate investigation, with action-level breaches requiring cessation of works until the cause is resolved. Monthly reporting to MHCLG summarises data trends, site activities, and any exceedance events.
- 5.3.7 In conclusion, with the full suite of IAQM-, GLA-, and RBKC-aligned mitigation measures in place, and a comprehensive monitoring strategy, the residual air quality impacts from the Proposed Scheme are assessed as not significant. The assessment demonstrates that dust and particulate emissions can be effectively controlled, ensuring protection of nearby receptors throughout the works.



- 5.3.8 Therefore, it is considered that the Proposed Scheme is in accordance with the provisions set out in the NPPF, Policy SI1 'Improving air quality' of the London Plan, and Local Plan policies GB6 'Air Quality' and GB7 'Construction Management'.

5.4 Ecology

- 5.4.1 A Preliminary Ecological Appraisal (PEA) was undertaken to identify ecological constraints, determine the need for further surveys, and guide mitigation during the works to carefully take down the Tower. The assessment combined desk studies (2021 and updated 2026) with field surveys, including updated walkovers, UKHab mapping, a Daytime Bat Walkover, Ground-Level Tree Assessment, and a Preliminary Roost Assessment (PRA) of the building. Surveys covered habitats, protected species, invasive species, and ecological features within the Site and its immediate urban surroundings.
- 5.4.2 The Site is dominated by hardstanding and built fabric, with very small areas of sparsely vegetated land and a handful of trees. No statutory designated ecological sites lie within 2km, and non-statutory Sites of Importance for Nature Conservation nearby are separated by dense urban infrastructure, meaning no anticipated impact. No high-value or irreplaceable habitats are present within the Site. The main ecological sensitivities identified relate to potential bat roosts and nesting birds within the building. The PRA found several crevices in the building with low suitability for individual roosting or hibernating bats, with a few features that could not be fully inspected. Trees showed negligible bat roost potential, though one contained an old bird nest. Other species groups, including badger, otter, water vole, reptiles, amphibians, priority plants, and priority invertebrates, were assessed as absent or unsupported due to the highly urbanised setting and lack of suitable habitat.
- 5.4.3 The key constraints relate to potential impacts on bats if roosts are present and disturbance to nesting birds. As a result, the report recommends a Precautionary Method of Working (PMW), which the Proposed Scheme is proceeding under. This includes floor-by-floor endoscope checks of crevices, progressive deployment of static bat detectors on each floor before becoming an exclusion zone, pre-work checks for nesting birds, and measures to avoid nighttime illumination or disturbance. If evidence of bats is found at any stage, further surveys and a Natural England bat mitigation licence may be required. General construction pollution controls and timing restrictions, where possible, such as avoiding the bird nesting season, are also advised.
- 5.4.4 Overall, the PEA concludes that ecological constraints on the works to carefully take down the Tower are limited and manageable, provided the PMW is followed and mitigation measures are implemented. At the time of reporting, no evidence of bats had yet been recorded. With precautionary working methods, appropriate ecological oversight, and review of the programme or scope changes, the Proposed Scheme can proceed without significant ecological impact.
- 5.4.5 Therefore, it is considered that the Proposed Scheme is in accordance with NPPF Chapter 15 'Conserving and enhancing the natural environment', The London Plan Policy G7 'Trees and woodlands', and Local Plan Policy GB16 'Trees'.

5.5 Biodiversity Net Gain

- 5.5.1 BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10%, meaning that development will result in more or better-quality natural habitat than existed before development. A BNG Assessment has been prepared to support this non-urgent Crown Development application.



- 5.5.2 The assessment follows the statutory BNG framework and uses the Statutory Biodiversity Metric to quantify the pre-development biodiversity value of the Site. A desk study was undertaken, reviewing online datasets (MAGIC, Ancient Tree Inventory, local strategies) to identify any irreplaceable habitats, designated sites or priority habitats that may influence BNG requirements. This is followed by field surveys in 2021 with updates in January 2026, undertaken by qualified ecologists. Habitats are classified according to UK Habitat Classification v2.0 and assessed for their condition using criteria set out in the Metric User Guide.
- 5.5.3 The 0.51-ha site is almost entirely urban and hard-surfaced, reflecting its long-term management and built context. The desk study confirmed that no irreplaceable habitats, priority habitats or statutory/non-statutory nature conservation designations are present on the Site. All habitats are assessed as low strategic significance, consistent with the absence of a Local Nature Recovery Strategy for Greater London.
- 5.5.4 Baseline habitats comprise four types: Artificial unvegetated, unsealed surface; developed land, sealed surface; ruderal/ephemeral vegetation; and individual urban trees. Most surface habitats are of very low distinctiveness and generate 0.00 units due to their sealed/urban nature. Ruderal/ephemeral habitat (0.01 ha) provides 0.02 units in poor condition. The primary contributors to biodiversity value are urban trees, which together account for 0.83 units. The total baseline value is 0.85 habitat units.
- 5.5.5 Under the Proposed Scheme scenario, 0.73 units will be retained (all from trees) and 0.12 units lost, resulting in a –13.9% net change. To achieve MHCLG’s mandatory 10% BNG, an additional 0.20 units would be required (raising total units to 0.93).
- 5.5.6 MHCLG intends to achieve this through off-site biodiversity gains, as the Grenfell memorial’s design is not yet available. To secure the 10% BNG, MHCLG are exploring whether to provide 0.20 area habitat units through registered off-site biodiversity gains or purchase statutory biodiversity credits. As a ‘spatial risk multiplier’ applies to statutory credits, credits are worth 0.5 biodiversity units, meaning that two statutory credits must be purchased for every one biodiversity unit. Therefore, as 0.20 area habitat units are needed to address the deficit for the Proposed Scheme, a total of 0.40 area credits would be required.
- 5.5.7 In addition, MHCLG are in discussions with local schools to explore opportunities for tree planting as a bonus scheme outside of the mandatory 10% BNG scope, to secure gains for the local community. MHCLG will secure long-term management of the trees through direct agreements with each school, allowing the biodiversity benefits to be achieved locally.
- 5.5.8 Therefore, it is considered that the Proposed Scheme is in accordance with the provisions of the NPPF, the London Plan Policies G6 ‘Biodiversity and access to nature’ and G7 ‘Trees and woodlands’, and Local Plan Policies GB14 ‘Green and Blue Infrastructure’ and GB16 ‘Trees’.

5.6 Carbon

- 5.6.1 The Proposed Scheme’s greenhouse gas emissions (GHGs) have been considered through alignment to global carbon infrastructure standards such as PAS 2080:2023¹⁶. Other standards which consider the impact of carbon are BS EN15978:2011 ‘Sustainability of Construction works’, BS EN17472:2022 ‘Sustainability Assessment of Civil Engineering Works’ and Royal Institute of Chartered Surveyors (RICS) ‘Whole Life Carbon Assessment for the Built Environment’. The publication of the London Plan by the GLA requires a report on the carbon cost (tCO₂e) associated with demolition works.

¹⁶ <https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/pas-2080-carbon-management-in-infrastructure-and-built-environment/>

- 5.6.2 A Whole Life Carbon Assessment (WLCA) typically quantifies GHG emissions across an asset's full lifecycle, including activities relating to material extraction, transport, construction, operation, and the deconstruction phase, including material processing and disposal. The rationale for the sensitive works to carefully take down Grenfell Tower is explained above in paragraph 1.1.3 and in the Statement of National Importance. This is not considered to be overridden by any circular economy considerations having regard to the particular circumstances.
- 5.6.3 This assessment is limited to mitigation measures relating to deconstruction plant fuel use, transport fuel use, on-site electricity consumption, high-level material data and portable water use. Accordingly, this assessment does not cover off-site transport routes or recovery/recycling outcomes. As part of AtkinsRéalis' support to MHCLG, a set of preliminary carbon mitigation measures for decommissioning have been agreed. The most relevant measures to reduce GHG emissions and wider environmental impacts are outlined below.

Electricity

- Connecting the site to mains electricity and removing temporary power generators from site operations. This transition eliminates the need for oil and diesel-powered generation, reducing the on-site fuel consumption, local air pollution, and associated GHG emissions. In addition, mains power enhances energy efficiency, reduces site noise levels, and improves the reliability of on-site energy provision.
- Upgrading exterior lighting on the hoarding and interior lighting, including within the site cabins and welfare units, from outdated incandescent lights to new energy-efficient LED products and installing Passive Infrared (PIR) sensors to enable automatic, occupancy-based control. This reduces electricity consumption, decreases maintenance requirements due to LEDs' longevity, and enhances overall lighting quality.
- Procuring contracts with new renewable energy utility providers that ensure certification of energy from low-carbon or zero-carbon sources. This shift supports a measurable reduction in scope 2 emissions by replacing grid-averaged electricity with power generated from renewable technologies.

Water

- Rainwater harvesting tanks installed and grey water reuse to reduce reliance on potable water supplies and reduce the GHG emissions associated with water treatment and distribution.
- Installation of dual-flush toilets, enabling users to select a reduced volume "half flush". This measure reduces the water consumption per use, supports a more efficient operation of the site's sanitary system, and further contributes to ongoing reductions in both water demand and processing.

Contractor Good Practice

- Provision of dedicated recycling bins and implementation of on-site material segregation systems to ensure materials such as paper, cardboard, metals, plastics and timber are separated at source. This approach maximises recycling rates, reduces the volume of unrecycled material, and supports compliance with best-practice recycling standards.
- Systematic recording of travel to and from site for all staff and contractors to quantify transport-related carbon emissions. This aids the identification of opportunities to reduce travel-related emissions and supports continuous monitoring of the site's carbon footprint.
- Delivery of environmental toolbox talks on-site to raise awareness of best practices for reducing GHG emissions.
- Ensuring that all timber is sustainably sourced, preferably certified under schemes such as Forestry Stewardship Council (FSC) or Programme for the Endorsement of Forest Certification (PEFC).



Transport Fuels

- Increased provision of secure on-site cycling parking to encourage active travel among staff and visitors. This supports a modal shift away from private car use and promotes low-carbon commuting habits.
- Installation of two 7.4 kW EV (electric vehicle) pod charging points to provide convenient charging for visitors' and site vehicles. This reduces reliance on petrol and diesel vehicles whilst supporting the project's transition to lower emission transport options.

5.6.4 The Proposed Scheme's carbon assessment scope focuses on practical, on-site mitigation, including deconstruction plant and transport fuel use, site electricity consumption, high-level materials data, and potable water use, while excluding off-site transport routes and recovery/recycling outcomes. Within this defined scope, AtkinsRéalis has identified preliminary measures that prioritise switching to mains and renewable electricity, improving energy efficiency (e.g., LEDs and PIR controls), reducing potable water demand (rainwater/greywater reuse and dual-flush systems), strengthening contractor good practice (segregation, travel logging, toolbox talks, sustainable timber), and supporting lower-carbon travel through cycling facilities and EV charging. Collectively, these measures provide a clear, practical pathway to reduce decommissioning-related emissions and wider environmental impacts.

5.6.5 Therefore, it is considered that the Proposed Scheme is in accordance with the provisions of the NPPF, the London Plan, and Local Plan Policy GB7 'Construction Management'.

5.7 Noise and Vibration

5.7.1 A Noise and Vibration Assessment has been prepared, focusing on the potential for noise and vibration generation during the works to carefully take down the Tower. The assessment completed baseline monitoring that showed that existing noise levels around the site are typically 57–60 dB LAeq,10hr, measured over several months during low-impact maintenance works, establishing a reliable baseline for assessment. Baseline vibration surveys similarly found very low levels (generally below 1 mm/s) with occasional isolated spikes attributed to accidental disturbances rather than genuine environmental effects. The assessment identifies several sensitive receptors, including Kensington Aldridge Academy, the Kensington Leisure Centre, and multiple residential blocks (e.g., Treadgold House, Barandon Walk). All directly adjacent residential properties have been vacated, reducing the number of occupied receptors but maintaining them in the assessment for completeness. Noise modelling predicts façade noise levels of 67–75 dB LAeq,10hr during the most intensive stages of the Proposed Scheme, particularly when works occur at lower heights.

5.7.2 A noise risk assessment, using the London Authorities Noise Action Forum methodology from the London Good Practice Guide: Noise & Vibration Control for Deconstruction and Construction July 2016, categorises the site as high risk, driven mainly by proximity to receptors and the long programme duration, but mitigated through extensive good-practice measures, Best Practicable Means (BPM), and a detailed monitoring strategy. The vibration review confirms that exceedances recorded during Sequences 1 and 2 were largely due to monitor disturbance, such as plant equipment passing close to monitors, or environmental factors like animals or rainfall, rather than construction impacts. Once monitors were repositioned and protected, exceedances ceased, and vibration levels remained within acceptable peak particle velocity (PPV) thresholds (1–5 mm/s). The monitoring plan includes continuous unattended web-enabled noise and vibration monitoring with automated alerts at trigger and action levels, regular review of plant and methods, and relocation of monitors as the site evolves. Noise action limits (typically 70–75 dB LAeq,10hr) and vibration limits (3–5 mm/s PPV) are set in accordance with RBKC requirements and BS 5228.



- 5.7.3 Table 6.3 of the assessment sets out how the project applies BPM to minimise noise by ensuring strong site management, well-briefed staff and the use of effective hoarding, careful site layout and controlled access points. Plant and equipment meet recognised noise standards, are properly silenced, located away from sensitive receptors, and are switched off when not in use, with preference given to quieter technology and mains power. Vehicle movements are tightly managed to avoid idling, queuing, unnecessary reversing, and out-of-hours activity, while the works to carefully take down the Tower use low-impact, non-percussive methods wherever possible, including lifting out larger elements for processing in screened areas. Continuous monitoring of noise and vibration will be undertaken through regular audits, trigger alerts, and reviews of working methods, supported by a proactive community liaison process that provides clear communication, timely updates, and a structured approach to complaint handling.
- 5.7.4 The assessment concludes that, with BPM, robust monitoring, and the adopted mitigation measures, noise and vibration from the Proposed Scheme can be effectively controlled and are not expected to result in significant adverse effects at nearby sensitive receptors. Predicted levels are within acceptable parameters, and historical exceedances have been addressed through appropriate corrective actions. Future risks will continue to be managed through the real-time monitoring system, proactive investigations, and close coordination with the local authority throughout the programme.
- 5.7.5 Therefore, it is considered that the Proposed Scheme is in accordance with The London Plan Policy D14 'Noise', and Local Plan policies GB7 'Construction Management' and GB8 'Noise and Vibration'.

5.8 Landscape

- 5.8.1 A Townscape and Visual Assessment has considered the effects on identified receptors resulting from the Proposed Scheme. A site assessment was undertaken, evaluating the potential direct and indirect townscape and visual adverse effects resulting from the removal of a characterising townscape and defining element, as well as any beneficial effects arising from increased openness and/or the creation of a more coherent skyline.
- 5.8.2 The assessment utilised best practice and the methodology within the Guidelines for Landscape and Visual Assessment Third Edition (2013). It combined desk-based research and multiple winter site visits (2023 and 2026) to establish a conservative, "most visible" baseline. The study reviews townscape character within 750m of Grenfell Tower and visual influence across a 2km radius, identifying five Townscape Character Areas (TCAs) and fourteen representative viewpoints. Rather than applying conventional heritage-style value judgements, the assessment focuses on the extent and nature of visibility and influence, recognising the exceptional and sensitive context of Grenfell Tower. The assessment shows that while Grenfell Tower remains a defining landmark within the immediate Lancaster West Estate, its visibility is substantially constrained by surrounding built form and infrastructure, including the Westway, rail corridors, and adjacent institutional buildings.
- 5.8.3 The assessment concludes that significant townscape effects are likely only within the North Kensington Estates TCA, where the Tower remains a prominent and defining element of the local environment, exerting the strongest influence. Visual effects are predicted to occur, in part, due to different viewers' expectations. These visual effects are predicted from five close-range viewpoints where the Tower is a dominant or pronounced element: Walmer Road (Kensington Leisure Centre), Grenfell Road, Waynflete Square, Silchester Road, and Ladbrooke Crescent. Beyond 250m, visibility becomes sporadic, and effects are generally limited by intervening development, transport infrastructure such as the A40 Westway, and partial screening by vegetation. The assessment identifies no townscape or visual constraints that would prevent the completion of the works but acknowledges that the removal of the Tower will result in a profound change to views and perceptions at a local level.
- 5.8.4 Therefore, it is considered that the Proposed Scheme is in accordance with Local Plan Policy CD1 'Context and Character'.



5.9 Transport

- 5.9.1 The Transport Statement assesses the transport and access implications of the Proposed Scheme. The methodology draws on baseline transport and pedestrian movement data (2023 surveys), existing workforce travel patterns, detailed HGV routing and scheduling information, and local collision records. Trip generation for personnel, light vehicles and HGVs reflects the controlled, low-intensity nature of the works, with over 90% of the workforce travelling by public transport or active modes. Pedestrian Comfort Level (PCL) modelling was undertaken for AM and PM peaks using TfL methodology, while traffic surveys and DfT count points were used to understand baseline vehicle flows and assess the relative contribution of construction movements. HGV routing, frequency, and operating hours were evaluated against school peak windows and existing residential sensitivities.
- 5.9.2 The assessment concludes that the works to carefully take down the Tower have a negligible impact on the transport network. PCL results remain unchanged at A+/A across all links, indicating no perceptible effect on pedestrian conditions. Daily traffic associated with the works, typically 10 HGV movements and around 17 light-vehicle movements, represents a statistically insignificant increase against background flows. Parking impacts are minimal due to very low staff car dependency and limited subcontractor presence. Public impacts have been negligible, with no complaints raised and no collisions recorded involving site traffic. Mitigation and management measures, such as restricted HGV hours, school-time movement pauses, strict routing, and marshalled vehicle movements, ensure community safety, operational discipline, and compliance with national, regional, and local policy. Overall, the Statement concludes that the Proposed Scheme can continue without causing adverse transport or highway safety impacts.
- 5.9.3 Therefore, it is considered that the Proposed Scheme is in accordance with Chapter 9 'Promoting sustainable transport' of the NPPF, Policy T4 'Assessing and mitigating transport impacts' of The London Plan, and Policy TR5 'Land Use and Transport' of the RBKC Local Plan.

5.10 Flood Risk and Drainage

- 5.10.1 The Environment Agency's Flood Map for Planning shows that the Site is located in Flood Zone 1, which has a low probability of fluvial flooding. As the Site's area is approximately 0.51ha, a Flood Risk Assessment is not required as it is below the 1ha threshold. The Flood Map also shows that the Site is at risk from surface water flooding, with a 3.3% (1 in 30) chance of flooding each year.
- 5.10.2 A Drainage Strategy Report was undertaken by Curtins Consulting Ltd in February 2013, on behalf of RBKC, to support the discharge of condition 20 attached to the decision notice for planning application reference PP/12/01833/Q06. The application comprised demolition of the existing leisure centre and associated sports pitch and parking facilities, and construction of a new leisure centre, academy, residential units and associated hard and soft landscaping areas. Attenuation storage was provided in the drainage system, 600m³ in total, to ensure that 1:100 year storm events plus 30% climate change allowance can be safely stored without flooding buildings, key routes, or adjacent land.
- 5.10.3 The attenuation storage at the Site remains in place and will not be affected or removed as a result of the Proposed Scheme. As previously mentioned in Section 1.3, MHCLG are working with the local community to create a memorial at the Site. Details and the design of the memorial will be provided in due course, along with the submission for the necessary planning consent. As the Site's future design is currently not known, details cannot be provided as part of this application. It is considered that, as the existing surface water attenuation tanks will remain at the Site, there will be no significant change or increase to the risk of surface water flooding as a result of the Proposed Scheme. Therefore, the Proposed Scheme is considered to be in accordance with NPPF Chapter 14 'Meeting the challenge of climate change, flooding and coastal change', The London Plan Policy SI12 'Flood risk management', and Local Plan Policy GB11 'Flood Risk'.



5.11 Historic Environment

- 5.11.1 A Historic Environment Assessment has been prepared to identify relevant designated heritage assets, understand their significance and the contribution of setting, and assess the extent of harm arising from the Proposed Scheme. Archaeology was scoped out on the basis that the existing basement and foundations would already have removed earlier archaeological deposits.
- 5.11.2 The assessment considers nearby listed buildings and conservation areas, focusing on those whose settings could theoretically be affected by the Tower's removal. For all nearby Grade II listed buildings, including 1–2a Whitchurch Road, the Church of St Clement, and the group of Richard Norman Shaw buildings at Freston Road, the study concludes that the Proposed Scheme would not harm their historic environment significance. For the surrounding conservation areas (Oxford Gardens, Avondale, Avondale Gardens, Norland, Ladbroke, and Wood Lane), the Tower is visible in select long-range views, but in all cases, it is identified as part of a wider mid-20th century development that already contrasts with the prevailing Victorian or Edwardian character. Therefore, the Proposed Scheme would not harm the historic environment's significance of these conservation areas.
- 5.11.3 Overall, the assessment concludes that the Proposed Scheme would not harm the significance of any designated heritage asset assessed, including listed buildings or conservation areas. The historic environment significance, character, and appearance of the surrounding conservation areas would be preserved, giving rise to no significant adverse heritage impacts.
- 5.11.4 Therefore, it is considered that the Proposed Scheme is in accordance with the provisions of the NPPF, the London Plan Policy HC1 'Heritage conservation and growth', and Local Plan policies CD3 'Heritage Assets', CD4 'Heritage Assets – Conservation Areas', and CD5 'Heritage Assets – Listed Buildings'.

6. Conclusion

- 6.1.1 This Planning Statement has assessed the Proposed Scheme to carefully and sensitively take down Grenfell Tower under a non-urgent Crown Development application. The evidence presented demonstrates that the proposal is necessary, proportionate, and aligned with MHCLG's statutory responsibilities as landowner to ensure the long-term safety of the Site and the surrounding community.
- 6.1.2 The Statement has shown that the Proposed Scheme accords with national, regional and local planning policy. The sensitive works are required to address the ongoing structural deterioration of the Tower and to minimise risks to public safety, in accordance with the provisions of the Town and Country Planning Act 1990 and the National Planning Policy Framework. Each technical discipline has demonstrated that, with appropriate mitigation and management measures in place, the residual effects of the Proposed Scheme will be acceptable and will not give rise to significant adverse impacts.
- 6.1.3 The works are being undertaken using 'best practicable means', supported by a comprehensive and robust monitoring regime, designed to protect nearby residents, sensitive receptors and the wider community throughout the works period. The Proposed Scheme does not pre-empt future decisions regarding the permanent use of the Site. MHCLG continues to work with the local community to develop proposals for a future memorial, which will be subject to a separate planning application at the appropriate time.
- 6.1.4 Overall, the Proposed Scheme represents a well-considered, safety-led and policy-compliant approach to sensitively and carefully take down Grenfell Tower. It is, therefore, respectfully requested that the Secretary of State grant full planning permission for the Proposed Scheme.



APPENDICES

Appendix A. EIA Screening Evidence

OFFICIAL



[REDACTED]
Grenfell Programme Director
Grenfell Site and Programme Team

By email only:

[REDACTED]

Please ask for:

Tel:

Email:

Your ref:

Our ref:

Date:

[REDACTED]

PCU/EIASCR/K5600/3372396

25 September 2025

Dear Helen

**Request for a Screening Direction
Town and Country Planning (Environmental Impact Assessment) Regulations 2017
Proposal for: the deconstruction of Grenfell Tower, Grenfell Road, North Kensington
London W11 1TQ**

I refer to the letter and enclosures from your team received by email dated 3 September 2025, made under 5(6) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (S.I. 2017/571) ("the 2017 Regulations") for the Secretary of State's screening direction on the matter of whether or not the development proposed above is 'EIA development' within the meaning of the 2017 Regulations.

The above development falls within the description in column 1 of paragraph 10(b) 'Urban Development Project' of Schedule 2 to the 2017 Regulations but does not fall within any other description of development in Schedule 1 or 2. However, having taken into account all the submitted information, the development does not meet or exceed the applicable thresholds in column 2 of paragraph 10(b) of Schedule 2 to the 2017 Regulations. The proposal is **therefore not 'Schedule 1 development' or 'Schedule 2 development', and is therefore not "EIA development"**, within the meaning of the 2017 Regulations.

I am sending a copy of this letter and written statement to the Royal Borough of Kensington and Chelsea.

Yours sincerely,

[REDACTED]

Planning Casework Unit OFFICIAL
Ministry of Housing, Communities & Local Government
23 Stephenson Street
Birmingham
B2 4BH

Tel: 0303 444 8050
Email: pcu@communities.gov.uk



OFFICIAL

OFFICIAL



Head of Environmental Casework

This decision was made by officials on behalf of the Secretary of State, and signed on his behalf



OFFICIAL

AtkinsRéalis



AtkinsRéalis UK Limited

Nova North
11 Bressenden Place
Westminster
London
SW1E 5BY

Tel: +44 (0)20 7121 2000

© AtkinsRéalis UK Limited except where stated otherwise