

AtkinsRéalis



# Historic Environment Assessment

Ministry of Housing, Communities and Local  
Government

April 2026

100122279-ATR-XX-HE-0001

# GRENFELL TOWER

# Notice

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# 1. Introduction

This Historic Environment Statement has been prepared by AtkinsRéalis on behalf of 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 the works to carefully take down the Grenfell Tower, Grenfell Road, North Kensington, London, W11 1TG (the 'Site'). The 0.51-hectare Site is located within the Royal Borough of Kensington and Chelsea (RBKC).

The Site is now classified as 'Crown land', as land in which MHCLG has a relevant interest. MHCLG and the Secretary of State are responsible for its maintenance.

This application for Crown Development is submitted pursuant to section 293D of the Town and Country Planning Act 1990 (as amended).

MHCLG's appointed Principal Contractor is carefully and sensitively taking down Grenfell Tower (the 'Tower'). These works are being conducted under permitted development (PD) rights granted to the Applicant by Part 19 Class Q of Schedule 2 of The Town and Country Planning (General Permitted Development) (England) Order 2015. This application aims to secure the necessary consent to complete the works, noting that this does not include the basement. Notification to utilise these PD rights was issued by MHCLG on the 23<sup>rd</sup> of September 2025.

## 1.1 The Proposed Scheme

The Proposed Scheme comprises the sensitive works to carefully 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.

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".*

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 will be supported by a luffing jib tower crane located to the north-east of the building.

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.



## 1.2 Historic Environment Assessment

This Historic Environment Assessment has been prepared as part of the application for planning permission to complete the sensitive works to carefully take down Grenfell Tower. This Statement:

- Summarises national and local policy for the historic environment;
- Describes the significance of the nearest designated heritage assets affected and the contribution of their settings to their significance, proportionately; and
- Assesses the impacts on the heritage assets in terms of harm, as required by the National Planning Policy Framework (NPPF) and weighs harm against the wider public benefits of the proposed Scheme.

Archaeology is excluded from this application, as Grenfell Tower is being carefully taken down within its footprint. Grenfell Tower's basement and foundations will have removed any archaeology within its footprint relating to the history of the site before the Tower was built.

Preparation of this assessment has been informed by consultation of the National Heritage List for England, local authority information about conservation areas, MHCLG Planning Casework Unit pre-application advice, and a site visit undertaken on 23<sup>rd</sup> March 2026.

The Heritage Assets are shown on the maps in Appendices A and B.



## 2. Legislation and Policy

### 2.1 Legislation

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 requires that the local planning authority shall 'have special regard to the desirability of preserving a listed building or its setting, or any features of special architectural or historic interest it possesses' when determining applications for development.

Section 69 of the 1990 Act requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

### 2.2 National Policy

Section 16 of the NPPF (2024) contains current national policies for the historic environment.

Paragraph 207 of the NPPF requires a description of the significance of the heritage assets affected by a proposal including the contribution made by their settings to be included in the planning application. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 208 states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) and should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Paragraph 212 states 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.

Paragraph 214 states that 'where a proposed development will lead to substantial harm to, or total loss of significance of, a designated heritage asset, local planning authorities should refuse consent', unless the substantial harm or total loss is necessary to achieve sustainable public benefits that outweigh the harm or loss. Paragraph 215 identifies that where there would be less than substantial harm, this harm should be weighed against the public benefits of the proposal.

Paragraph 220 states 'not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance' such that the significance of elements affected need to be assessed under paragraph 195 or 196 as appropriate, with their contribution to the significance of the Conservation Area or World Heritage Site 'as a whole' taken into account.

### 2.3 Regional Planning Policy

The London Plan 2021 is the relevant regional policy. Policy HC1 covers Conservation and Growth.

Section C and D of the policy cover development proposals. Section C states 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".



Section D states that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. As Grenfell Tower's basement would be retained, there would be no archaeological impacts.

## 2.4 Local Planning Policy

Local planning policy is set out in the Royal Borough of Kensington and Chelsea New Local Plan 2024. Policies relevant to this assessment comprise:

- Policy CD3 Heritage Assets – Section E of this policy requires that where development is proposed in the setting of a designated heritage asset:
  1. *The Council will look for opportunities to enhance or better reveal the significance of the designated heritage asset.*
  2. *Where the setting of the designated heritage asset makes a positive contribution to its significance, development which affects that setting will be permitted if it preserves or enhances the significance of the designated heritage asset.*
  3. *Where the setting is neutral or harmful to the significance of the designated heritage asset, development proposals will be expected to make the effect no worse while opportunities should be taken better to reveal that significance.*
- Policy CD4 Heritage Assets – Conservation Areas. This policy requires development to preserve or enhance the character or appearance and significance of conservation areas, and that development in conservation areas should take opportunities to enhance the character and appearance of its setting.
- Policy CD5 'Heritage Assets – Listed Buildings' requires development to preserve the special architectural or historic interest and significance of listed buildings, and reinforces the tests in relation to substantial harm and less than substantial harm as set out in the NPPF.

The Royal Borough of Kensington and Chelsea has prepared and adopted Conservation Area Appraisals for their conservation areas. Within each of these there is a map setting out the key views that particularly contribute to the historic environment significance and character and appearance of the conservation area. These are called Important Views and are discussed in the assessment below, where relevant.

## 3. Assessment

The significance of the nearest individual heritage assets is discussed below, and the impact on them from the Proposed Scheme is assessed.

The assessment assesses the impacts on designated heritage assets only.

This includes individual listed buildings outside the boundaries of conservation areas within 600m of the Grenfell Tower and conservation areas with boundaries within 600m of the Site. The listed buildings within the conservation areas are considered as part of the conservation areas.

### 1 and 2a Whitchurch Road (Grade II Listed Building)

1 and 2 Whitchurch Road (NHLE 1225245) is a three storey red brick house, built in 1863 by J F Bently, displaying Romanesque influence. It has distinctive arched windows, arranged in an echelon on its east elevation, lighting the entrance steps. Its facades face towards the mid-20<sup>th</sup> century estate to its north (which includes Grenfell Tower) and east. Its two principal elevations are best viewed from the north, looking away from Grenfell Tower and the modernist Lancaster West estate, and from the south east, on the approach from Treadgold Street which includes Grenfell Tower. The Proposed Scheme would therefore not harm the property's historic environment significance.

### Church of St Clement (Grade II Listed Building)

The 1867 Church of St Clement, on Treadgold Street (NHLE 1265169) was built by J P St Aubyn. It was built in the Early English style and has early 20<sup>th</sup> century single-storey vestries and side chapel. It is built with yellow brick, with red and yellow brick polychromatic arches and some stone decoration. It has a clock cupola/tower.

The street pattern is historic and the church is designed to be viewed from the north, north-east and south-west. Though the mid-20<sup>th</sup> century Lancaster West estate detracts from this in *historic environment* terms, the church has very strong links with the local community.

The Proposed Scheme would not harm the church's historic environment significance.



Figure 3-1 - The view west towards the Church of St Clement (NHLE 1265169) from Treadgold Street.

## Group of listed buildings at the north end of Freston Road

There is a group of six grade II listed buildings west of the Proposed Scheme, to the east of the A3220 West Cross Route. These include:

- The Latimer AP Academy group of listed buildings (NHLE 1358568, 1079813 and 1191729), formerly a Board School, by Richard Norman Shaw, including the main 1879 building, a single storey late 19<sup>th</sup> century school room to its east and the late 19<sup>th</sup> century caretaker's house.
- The related Harrow Club (NHLE 1079811), a former 1887 church and the building to its west (NHLE 1079839), and the former 1877 clergy house (NHLE 1079812) all by Richard Norman Shaw.

The buildings are significant because of their architecture and their design by R Norman Shaw, a major architect of the period and exponent of the Queen Anne Revival style. These examples are relatively muted examples of the style and are built with yellow brick with red brick dressings.

Their setting is dominated by nearby towers and the mid-20<sup>th</sup> century blocks and spaces to their east and the major road network to the west, with the Hammersmith & City and Circle London Underground lines to their south-east and east. The massing of the closer 20<sup>th</sup> century structures means that Grenfell Tower does not impact on the listed buildings' significance.

The Proposed Scheme would not harm the historic environment significance of this group of listed buildings.

## Oxford Gardens Conservation Area (RBKC CA 1)

Oxford Gardens Conservation Area (RBKC CA 1) is north of the A40 Westway. The character of the conservation area consists mostly of streets of two storey terraced housing dating between 1869 and 1926. St Helens Gardens within the conservation area is aligned towards Grenfell Tower. The Oxford Gardens Conservation Area Appraisal document does not identify the view under the classification of being an Important View in the conservation area (meaning a view that forms part of the conservation area's historic environment significance)<sup>1</sup>. The top of Grenfell Tower's scaffolding is visible above the roofline of the conservation area's buildings at the north-west end of St Helen's Gardens. However, the conservation area appraisal acknowledges that the area is surrounded by large scale major roads, industrial development and modern housing and there is a more prominent tower much nearer to the southern boundary, which imposes on the suburban view. The Proposed Scheme would remove an element of the large-scale modern developments from the conservation area's setting. The Proposed Scheme would, however, not harm the historic environment significance of the conservation area.

## Avondale Conservation Area and Avondale Gardens Conservation Area (RBKC CA 29 and 24)

Avondale Conservation Area and Avondale Gardens Conservation Area are covered by the same Conservation Area Appraisal<sup>2</sup>. Avondale Conservation Area is a two and three storey residential area that was built between 1860 and 1895. Avondale Gardens is an early 1920s development of two storey houses set around a garden square. The Conservation Area Appraisal identifies that the conservation areas form a contrasting area of low-rise housing within a townscape of much larger, later developments. The Important Views within these conservation areas<sup>3</sup> include important views that look north towards Grenfell Tower on Sirdar Road (a view into the south end of Avondale Conservation Area from beyond its south boundary), and on Avondale Gardens.

Grenfell Tower forms part of the larger scale mid 20<sup>th</sup> century development around the conservation area. The Proposed Scheme will lead to the loss of a part of this wider mid 20<sup>th</sup> century development, reducing the contrast with the 19<sup>th</sup> to early century character of the conservation areas to a very small degree.

The Proposed Scheme would remove an element of the large-scale modern developments from the conservation area's setting. However, the Proposed Scheme would not harm the historic environment significance of the conservation area.

## Norland Conservation Area (RBKC CA 2)

Norland Conservation Area mainly consists of a planned residential estate dating from the 1840s and 1850s, mostly consisting of two to four storey housing. Two streets provide channelled views towards Grenfell Tower. These are Addison Avenue, one of the main streets of the conservation area, and Princedale Road, which is set at an angle to the main grid of the conservation area.

The view on Addison Road was historically designed to be closed by St James's Church and is classified as an Important View in the Norland Conservation Appraisal<sup>4</sup>. The current temporary works, rather than Grenfell Tower itself feature in this view. Views along Princedale Road also include the temporary works on the site, rather than Grenfell Tower itself. The Proposed Scheme would not harm the historic environment significance of the conservation area.

<sup>1</sup> Royal Borough of Kensington and Chelsea. 2021. Oxford Gardens-St Quintin Conservation Area Appraisal, p.54, Fig 5.1

<sup>2</sup> Royal Borough of Kensington and Chelsea. 2015. Avondale and Avondale Park Conservation Area Appraisal.

<sup>3</sup> Royal Borough of Kensington and Chelsea. 2015. Avondale and Avondale Park Conservation Area Appraisal, p.36, Fig 5.1

<sup>4</sup> Royal Borough of Kensington and Chelsea. 2020. Norland Conservation Area Appraisal, page 59, Fig. 4.1



## Ladbroke Conservation Area (RBKC CA 3)

Ladbroke Conservation Area was a planned speculative development largely built between 1820 and 1870. It mostly consists of stuccoed (or partly stuccoed) classical terraces of four or five storeys. The street pattern ripples out from the top of Notting Hill, with extensive communal gardens and with facades of prominent buildings of the estate closing views down its streets. The northern end of the conservation area is more varied. The views along roads that are aligned towards Grenfell Tower are on Rosmead Road, Ladbroke Crescent, and Cornwall Crescent, all of which are identified as Important Views in Ladbroke Conservation Area Appraisal<sup>5</sup>. On Rosmead Road two of the mid 20<sup>th</sup> century estate towers are visible, and a crane relating to Grenfell Tower is visible rising above the 19<sup>th</sup> century terraced housing on Elgin Crescent. On Ladbroke Crescent and Cornwall Crescent, the Grenfell Tower is visible. The Proposed Scheme would remove a mid-20<sup>th</sup> century element above the roovescape of the largely mid-19<sup>th</sup> century townscape.

Given the size of the conservation area and the large amount of mid-20<sup>th</sup> century development in its setting, the Proposed Scheme would not harm the historic environment significance of the conservation area.

## Wood Lane Conservation Area (Hammersmith and Fulham CA 42)

The conservation area was designated to protect development around BBC Television Centre (built 1954) (NHLE 1393371). There has been large scale development to its east which has effectively screened the Television Centre from the land beyond, to its east.

The Proposed Scheme would not harm the historic environment significance of the conservation area which is centred on the BBC building.

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<sup>5</sup> Royal Borough of Kensington and Chelsea. 2015. Ladbroke Conservation Area Appraisal. p.53, Fig. 1.5



## 4. Conclusions

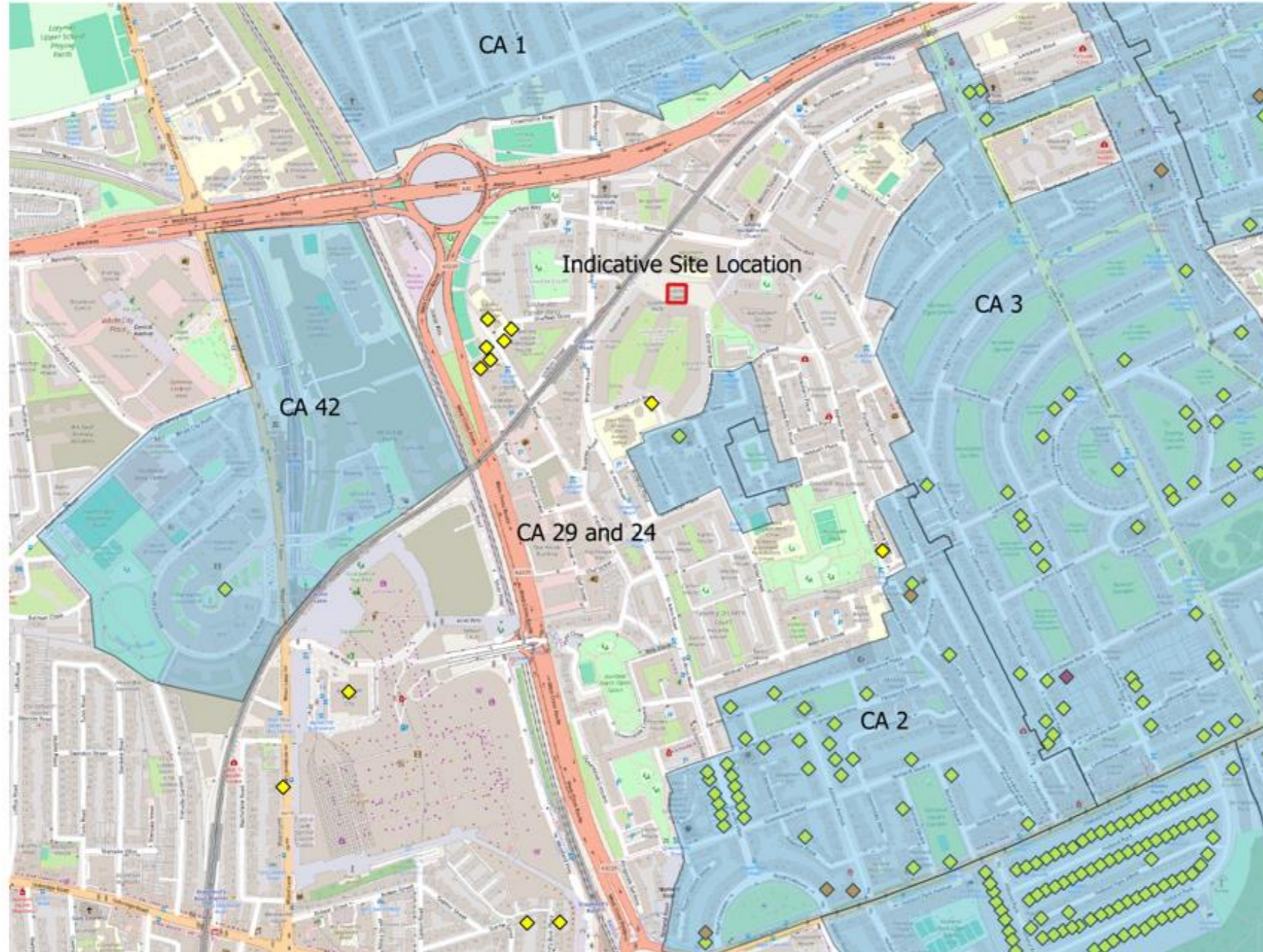
The Proposed Scheme would not harm the significance of the heritage assets assessed. In historic environment terms, the two nearest listed buildings would not be harmed, and the Church of St Clement would maintain its communal relationship with the local community. This is in accordance with national and local planning policy in respect of the historic environment, and would not give rise to harm to historic environment significance. The conservation areas' historic environment significance and their 19<sup>th</sup> to early 20<sup>th</sup> century characters would be preserved.



## 5. Appendices





# Appendix A. Location of designated heritage assets






Map showing Indicative Site Location, Conservation Areas and Listed Buildings within study area

**Legend**

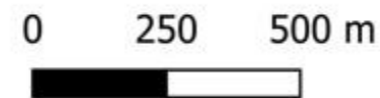
Base mapping

-  Site location
-  Conservation Areas

Listed\_Building\_points

-  Grade I
-  Grade II\*
-  Grade II

OpenStreetMap



Drawn By: MK  
Date: 31/03/26

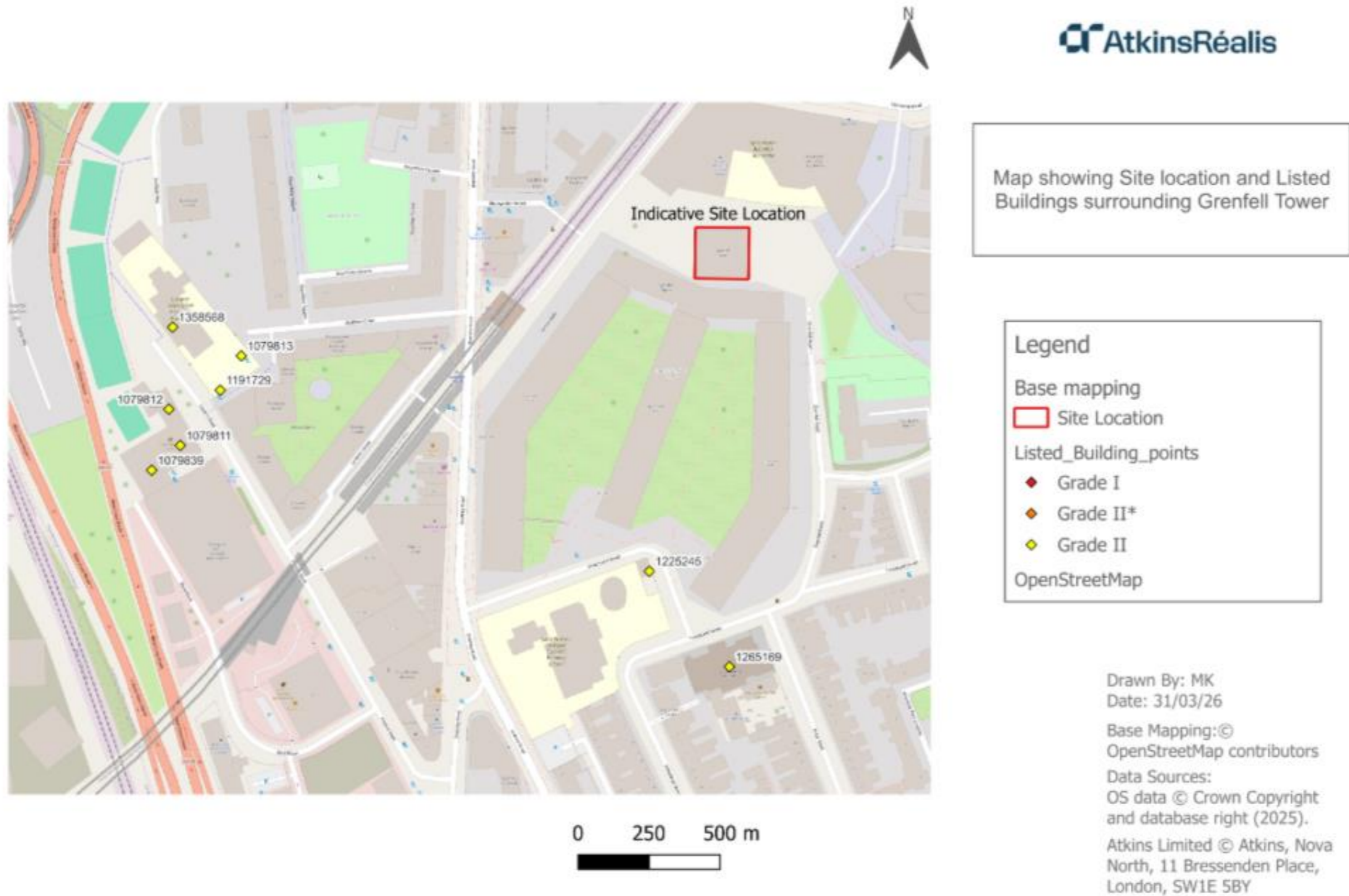
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# Appendix B. Detailed map of listed buildings referenced in the assessment



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