

Planning and Place

Kensington Town Hall, Hornton Street, London, W8 7NX

Director of Planning and Place

[REDACTED]



Crown Development Case Team
Planning & Environmental Applications Service
Planning Inspectorate

By email only

Date: 2 July 2026

reference: CROWN/2026/0000003

Dear Sir/Madam,

**The Town and Country Planning 1990 (Section 293D)
The Town and Country Planning (Crown Development Applications) (Procedure and Written Representations) Order 2025**

**The works to take down Grenfell Tower
at
Grenfell Tower, Grenfell Road, North Kensington, London, W11 1TQ**

The Royal Borough of Kensington and Chelsea (RBKC), acting in its duty and function as Local Planning Authority (LPA), offer the following technical information to assist the Planning Inspectorate in its consideration of the above referenced Crown Development Application. This letter also contains the responses of the Lead Local Flood Authority and the Local highway Authority.

This application relates to the ongoing process of deconstruction of Grenfell Tower. The Council recognise that this is a sensitive issue and one that is of huge importance to bereaved, survivors and local residents. We are providing this consultation response to support PINs in ensuring the deconstruction can continue as carefully and sensitively as possible. We would encourage the Applicant to continue to engage with the local community to understand any concerns from their perspective.

The Grenfell Tower site was transferred to Government ownership, becoming Crown land, so that the Council would have no role in managing the site or determining its future, in accordance with the wishes of the bereaved, survivors and local residents. The deconstruction works are therefore overseen by MHCLG rather than managed by the Council. As this is a Crown development application, the Planning Inspectorate is responsible for administering and examining the application and for providing an independent and impartial assessment of the Government's proposals. The Council's role is limited to acting as Local Planning Authority consultee, providing technical planning comments to assist the Planning Inspectorate in its consideration of the application.

Planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise, as set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004. The development plan consists of the Council's Local Plan 2024 (local

development plan planning policies for the borough) and the London Plan 2021 (spatial development strategy for Greater London).

The main planning considerations applying to the site and associated policies are:

	Local Plan 2024	London Plan 2021
Design	CD1: Context and Character CD15: Views	
Heritage	CD3: Heritage Assets CD4: Heritage Assets – Conservation Areas CD5: Heritage Assets – Listed Buildings	HC1: Heritage Conservation and Growth
Living conditions	GB7: Construction Management GB8: Noise and vibration	D14: Noise
Green and blue infrastructure	GB11: Flood Risk GB12: Sustainable Drainage GB14: Green and Blue Infrastructure GB16: Trees GB17: Waste Management	G1: Green Infrastructure G6: Biodiversity and Access to Nature G7: Trees and Woodland SI12: Flood Risk Management SI13: Sustainable Drainage
Air Quality	GB6: Air Quality	SI1: Improving Air Quality
Transport	TR5: Land Use and Transport TR6 Part C: Road safety TR6 Part F: Safeguarding public access GB7: Construction management	T4: Assessing and mitigating transport impacts T7: Delivery, servicing and construction

The **National Planning Policy Framework (NPPF)** (December 2024) provides the Government's overarching planning policy framework and is a material consideration in the determination of planning applications.

The national **Planning Practice Guidance (PPG)** is also a material consideration. The PPG builds on the policies in the NPPF by adding practical context and technical details.

The main relevant supplementary planning documents (SPDs) of relevance adopted by the Council are:

- Air Quality SPD (2009)
- Greening SPD (2021)
- Noise SPD (2009)

- Transport and Streets SPD (2016)
- Trees and Development SPD (2023)

The following Mayoral Supplementary Planning Guidance (SPG) and London Plan Guidance (LPG) are also relevant:

- The control of dust and emissions during construction and demolition SPG (July 2014);
- Air Quality Neutral LPG (February 2023)
- Sustainable Transport, Walking and Cycling draft LPG (December 2022).

The LPA has not carried out a full assessment of the application against all development plan policies and guidance set out above, nor does it draw any final conclusions as to whether there is compliance with the development plan as a whole. It will be for the Planning Inspectorate to carry out this assessment. The information contained in this letter is intended to assist the Planning Inspectorate in their assessment and is limited to a review of the technical information provided by the Applicant alongside their application.

Noise and Nuisance

Policy background

Policy D14: Noise of the London Plan seeks to improve, manage and mitigate noise. Development proposals should manage noise by, inter alia, avoiding significant adverse noise impacts on health and quality of life, and mitigating and minimising potential adverse impacts of noise.

Policy GB8: Noise and Vibration of the RBKC Local Plan is relevant. It requires that development must not result in unacceptable noise or vibration impacts on nearby residential amenity, including both construction and operational phases. Proposals must be supported by a Noise and Vibration Impact Assessment. Applications that fail to meet adopted standards which would harm surrounding amenity, will be resisted. The Noise SPD (2009) provides further technical guidance on assessing noise impacts of proposed developments.

Policy GB7: Construction Management of the Local Plan requires that relevant development (as specified in the RBKC Code of Construction Practice (CoCP)) must not create unacceptable impact on local residential amenity including neighbouring properties as a result of demolition impacts by complying with the Code.

Comment

The CoCP categorises sites based on their size and likely impacts, and ordinarily a pre-commencement planning condition requires that the specified details are agreed with the Council's Construction Management Team.

The taking down of the Tower has been taking place for some time and has been in line with the requirements of the CoCP such as no weekend working, noise/vibration monitoring, community liaison etc. In such circumstances the Code and bond scheme are not necessary in the particular circumstances of the case.

The Council's Noise and Nuisance Team has reviewed the submission, in particular the Noise and Vibration Assessment (*Document EEMC-PPAR001-201 Rev 5, dated 29 April 2026*). It is their view that the report sets out sufficient information and the measures detailed in table 6.3 (recommended good practice measures) are noted as being adequate to ensure alignment with policy GB8 of the Local Plan and policy D14 of the London Plan.

In considering whether to impose conditions to mitigate the adverse effects of the development, such as ensuring compliance with the Noise and Vibration Assessment and secure implementation of, and adherence to, the measures in table 6.3, the Planning Inspectorate is advised that works at the site to date have been observed by Officers as being well managed in accordance with relevant Development Plan policies.

Air Quality

Policy background

Improving air quality is the aim of London Plan Policy SI1, seeking to ensure development proposals do not lead to further deterioration of existing poor air quality, or create new areas that exceed air quality limits. Development proposals must be at least Air Quality Neutral. Measures to reduce emissions during demolition and construction are required, following best practice. Local Plan Policy GB6 reinforces these requirements and provides further detail to encourage effective controls and measures to reduce emissions.

Policy GB6 of the Local Plan repeats these requirements and requires all development to meet air quality neutral benchmarks. An air quality assessment is required for *significant demolition*. Development involving dusty works are required to produce a Dust Risk Assessment to identify potential impacts and appropriate mitigation to protect local sensitive receptors.

Comment

The entire Borough has been declared an Air Quality Management Area due to exceedances of the Annual Mean and 1-hour Mean for Nitrogen Dioxide (NO₂) and the Annual Mean and 24-hour Mean for Particulate Matter (PM₁₀) objectives.

Based on the submitted documentation, the principal sources of emissions associated with the works are expected to arise from the deconstruction activities and associated vehicle movements. These sources have the potential to emit nitrogen oxides (NO_x), nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}).

The submitted Air Quality Assessment, prepared by EEMC, applies appropriate IAQM and Mayor of London guidance to assess baseline conditions, sensitive receptors, and construction dust impacts, with conclusions indicating pollutant concentrations below relevant objectives and a robust identification of high dust risk during deconstruction. While minor omissions in 2024 monitoring data are noted, these do not materially affect conclusions given the inclusion of representative reference data. The assessment appropriately identifies nearby sensitive receptors and categorises dust risks as high during deconstruction, necessitating enhanced mitigation and monitoring.

Proposed measures, including continuous particulate monitoring, visual inspections, dust suppression, and NRMM compliance, are considered suitable, although monitoring should support, not replace, proactive on-site management. Construction traffic is unlikely to exceed IAQM thresholds and therefore does not require detailed assessment.

Subject to implementation of the recommended mitigation and monitoring regime, the assessment is considered adequate and consistent with best practice guidance. The Council encourages the Applicant to continue to monitor this issue closely and provide assurance to local people, as they have done so far.

The air quality and dust assessment are satisfactory and adequately addresses the requirements for site Environmental Management including dust mitigation and fugitive dust monitoring for the

duration of the remaining demolition work. This is in alignment with the relevant development plan policies above.

Lead Local Flood Authority

Policy background

Policy SI 12 of the London Plan requires development to manage current and future flood risk from all sources in a sustainable and cost-effective manner, informed by strategic and local flood risk evidence. Proposals must minimise and mitigate flood risk and address residual risk.

Policy SI 13 of the London Plan requires development proposals to aim to achieve greenfield run-off rates and ensure that surface water is managed as close to its source as possible.

Policy GB11 of the Local Plan requires development proposals to address and reduce flood risk and its impacts.

Policy GB12 of the Local Plan requires development to contribute towards the reduction in the rate and volume of surface water run-off into the combined sewer network and aim to achieve greenfield run-off rates.

Comments

The Council has statutory duties through the Flood and Water Management Act 2010 as Lead Local Flood Authority for the Borough.

The site is in the North Kensington Critical Drainage Area.

The application documents include a Planning Statement (Atkins Realis report reference 100122279-ATR-XX-PL-0001 dated April 2026) that covers flooding and drainage in Section 5.10. The information acknowledges the existing drainage system and attenuation tank that is within the site boundary and confirms that, "the attenuation storage at the Site remains in place and will not be affected or removed as a result of the Proposed Scheme".

The Planning Statement sets out that the Proposed Scheme is unlikely to alter the drainage to the site and will not increase the risk of flooding on the site or elsewhere. The Lead Local Flood Authority concludes that the information provided is adequate and aligns with requirements of development plan policy.

Transport and Highways

Policy background

London Plan policy T4 requires transport assessments to ensure that impacts on capacity of the transport network at the local level, network-wide and strategic level are fully assessed.

London Plan policy T7 requires that, during construction, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times.

Local Plan policy TR5 requires development to be located in suitable areas where the transport requirements can be met in a sustainable manner and requires transport assessments for large developments.

Local Plan policy TR6 Part C requires measures to improve road safety and policy TRC Part F seeks to ensure development does not reduce access to existing footways used by the public.

Local Plan policy GB7 relates to impacts on local residential amenity from demolition and construction.

Comment

The works commenced in September 2025 under permitted development rights afforded through statutory instrument. They have been carried out in adherence to a Traffic Management and Logistics Plan (TMLP) that was produced last year, informed by local engagement, including with Council officers. The TMLP has been operating satisfactorily with no reports of undue impacts from site traffic.

The planning application is supported by a Transport Statement (April 2026) produced by AtkinsRéalis. This document assesses the development proposals in the context of the transport networks in the vicinity of the site, including pedestrian routes, public transport services and the road network. The assessment concludes that trips generated by the development works would have a negligible impact on the transport network, with no perceptible effect on pedestrian conditions. Daily vehicular traffic associated with the works, typically ten HGV movements and approximately 17 light-vehicle movements, would not materially impact on local traffic conditions. The Council as highway authority agrees with these findings; they reflect the circumstances in the local area since the development works commenced, with no reports hitherto of significant issues.

The TMLP is cited within the transport statement but has not been submitted with this planning application. Under Local Plan Policy GB7 and London Plan Policy T7, development works that generate a significant number of HGV movements are required to have a Construction Traffic Management/ Logistics Plan in place to mitigate construction traffic impacts on highway users and local residential amenity. The scale of the works proposed on this constrained site trigger this policy requirement. Accordingly, a planning condition requiring adherence to an acceptable Traffic Management and Logistics Plan would address this requirement. Alternatively, the Applicant could be asked to submit the extant TMLP to the Crown Application Service prior to determination so that it could be referred to on a planning decision, doing away with the need to impose a condition requiring it.

The application proposals are consistent with the relevant development plan policies. The Council encourages the Applicant to continue to monitor this issue.

Ecology

Policy background

The NPPF expects the planning system to protect sites of biodiversity interest and provide net gains for biodiversity, and London Plan Policy G6 requires development proposals to manage impacts on biodiversity and aim to secure biodiversity gain.

Local Plan policy GB14 requires development to enhance habitat to increase biodiversity and for relevant development, to achieve a minimum 10 per cent biodiversity net gain.

Under the statutory framework (introduced by the Environment Act 2021) all development (subject to some exceptions) is required to achieve a 10 per cent biodiversity net gain.

Comments – Ecology

A Preliminary Ecological Appraisal has been submitted alongside the application. It records habitat features on site that have potential to support bats, nesting birds and foxes. The building is recorded as having low suitability for bats with a number of potential roost features suitable for individual bats, created by gaps and crevices where initial building removal works have already been carried out. However, no evidence of bats has been recorded during the works to date. No potential roost features have been recorded on site trees.

17 trees within the site have potential to support nesting birds. Pigeons have been recorded within the Tower structure. Due to high levels of disturbance, it's unlikely that any priority bird species will be present within/on the Tower structure.

The Precautionary Method of Working recommended to check for presence of bats and nesting birds is suitable and aligns with the requirements of development plan policy.

Comments – Biodiversity Net Gain (BNG)

The Applicant has submitted a Biodiversity Net Gain Baseline Report and a Biodiversity Net Gain Statutory Metric spreadsheet. It advises Initial habitat survey were carried out on 24.03.2021, with updates on 08.01.2026 and 30.01.2026.

Four small trees have been lost since the 2021 survey. Baseline data has assumed these are still in situ, in line with the BNG degradation principle. All other trees are to be retained.

The baseline is 0.85 habitat area units, of which 0.73 units will be retained, resulting in a net loss of -0.12 area habitat units and a -13.90% net change. No hedgerow or watercourse area units on site.

The Applicant is required to deliver a minimum 10% net gain for biodiversity, to meet legislative and local plan requirements. Therefore, an additional 0.20 units need to be provided of suitable distinctiveness to meet trading rules.

The Applicant has set out why there are no suitable on-site options. Therefore, delivery of BNG would be through the purchase of registered off-site biodiversity gains. Purchase of statutory biodiversity credits would be considered as a last option.

Any approval given by the Planning Inspectorate would be subject to the statutory biodiversity gain condition under paragraph 13 of Schedule 7A of the Town and Country Planning Act. The condition is deemed to apply to every planning permission granted for the development of land in England (unless exemptions or transitional provisions apply), and there are separate provisions governing the Biodiversity Gain Plan.

Any future submission of a Biodiversity Gain Plan would detail any off site or statutory biodiversity credits. Because this is the approach, there would be no requirement to consider planning obligations in this instance.

Trees

Policy background

London Plan Policy G7 expects proposals to ensure that existing trees of value (Category A and B and lesser category trees where these are considered by the local planning authority to be of importance to amenity and biodiversity, as defined by BS5837:2012) are retained wherever possible, and to include additional tree planting.

Local Plan Policy GB16 resists development which results in the damage or loss of trees of townscape or amenity value, or gives rise to a threat, immediate or long term, to the continued well-being of such trees. It requires adequate protection of existing trees during construction.

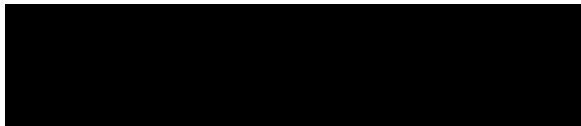
Comment

Document 100122279-ATR-XX-PL-0004 - *Further Information Response* provides information on trees. It notes that existing protection measures are in place for all retained trees on the site. This aligns with the requirements of RBKC Local Plan Policy GB16 Part D and London Plan policy G7.

Conclusions

As previously noted, the LPA has not carried out a full assessment of the application against all development plan policies and guidance. No final conclusions are drawn as to whether there is compliance with the development plan as a whole, which will be a verdict for the decision maker. The information contained in this letter is intended to assist the Planning Inspectorate in their assessment and is limited to a review of the technical information provided by the Applicant alongside their application. I hope that the information is of assistance

Yours faithfully,

A large black rectangular box redacting the signature of the Director of Planning and Place.

**Director of Planning and Place
The Royal Borough of Kensington and Chelsea**