

14 August 2026

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Dear Philip,

RE: Cannon Factory – Request for an Environmental Impact Assessment (EIA) Screening Opinion

We write on behalf TH2026 LLP (hereinafter referred to as the 'Applicant') to request that the London Borough of Haringey ('LBH') adopts an Environmental Impact Assessment ('EIA') Screening Opinion in relation to the proposed redevelopment at the former Cannon Factory site, between Watermead Way, Ashley Road and Burdock Road, London, N17 9LZ ('the Site').

The Applicant is seeking full planning permission for the redevelopment of the Site to provide two buildings, one consisting of approximately 450 student accommodation units, and the other being a hotel with up to 170 rooms with a provision of commercial floorspace within the student accommodation block.

Application of the EIA Regulations

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017¹ (as amended) (the 'EIA Regulations') provide screening criteria and thresholds at which certain types of development projects should be screened to determine whether a project is an 'EIA Development'.

Regulation 2 of the EIA Regulations defines 'EIA Development' as development which is either Schedule 1 development, where EIA is mandatory, or Schedule 2 development, where the development is of description mentioned in column 1 of the table in Schedule 2 where —

- (a) any part of that development is to be carried out in a sensitive area; or
- (b) any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development.

For Schedule 2 Development, the local planning authority should consider whether the development is likely to have significant effects on the environment, that would trigger the need for an EIA.

These definitions have been applied to the Proposed Development and discussed below.

Schedule 1 Development?

The Proposed Development does not fall under any of the descriptions within Schedule 1, and therefore it is not 'Schedule 1 Development'.

Schedule 2 Development?

The Proposed Development does fall within the definition under paragraph 10(b) 'Urban Development Projects', as listed in Column 1 of Schedule 2. However, for this type of development to be 'Schedule 2 Development', it must be:

¹ His Majesty's Stationary Office (HMSO) 2017. *The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (as amended in 2018 and 2020)*.

- (a) carried out in a 'sensitive area' (as defined under regulation 2 – refer to **Appendix 1** at the end of this letter), or
- (b) one where any applicable threshold or criterion for paragraph 10(b) development is respectively exceeded or met, which in this case are that:
- the development includes more than 1 hectare of urban development which is not dwellinghouse development; or
 - the development includes more than 150 dwellings; or
 - the overall area of the development exceeds 5 hectares.

With reference to the 150 dwellings threshold, PBSA differs from traditional 'residential dwellings' as it is primarily used by full-time students and falls under a separate use class (Sui Generis) and circa 450 PBSA beds specifically refers to bedspaces, not self-contained units. However, PBSA could be considered as containing 'dwellings' and therefore has been considered as such, with reference to the screening criteria/thresholds.

In accordance with London Plan Policy H1 'Increasing housing supply', student accommodation will contribute to housing targets at a 2.5:1 ratio, with 2.5 PBSA bedrooms / units counting as a single home. As such, 450 PBSA bedspaces equate to approximately 180 residential dwellings, in terms of meeting London housing targets. Therefore, should the proposed PBSA use be assumed to be 'dwellings', it could be interpreted that the Proposed Development exceeds the 150-dwelling threshold, constituting 'Schedule 2 development'.

Given that the Proposed Development could constitute Schedule 2 Development, it triggers the need to be screened by the LBH to determine whether or not the project constitutes 'EIA Development'. Therefore, this document constitutes a Request for an EIA Screening Opinion from the LBH.

In accordance with the EIA Regulations, consideration has therefore been given within this document as to the potential for significant environmental effects as a result of the Proposed Development.

Whilst the EIA Regulations set the legislative context for EIA Screening, reference to UK Planning Practice Guidance (PPG)² should also be considered by a local planning authority in reaching an EIA Screening Opinion. PPG states:

"It should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits."

The PPG also provides indicative criteria and thresholds for schemes falling within Schedule 2 10(b), above which significant effects may be likely. These comprise:

"Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination. Sites which have not previously been intensively developed: (i) area of the scheme is more than 5 hectares; or (ii) it would provide a total of more than 10,000 m² of new commercial floorspace; or (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings)."

Information Required for Screening

Regulation 6(2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017² (as amended) (the 'EIA Regulations') require that the following information be provided with a screening opinion request:

- (a) a plan sufficient to identify the land;
- (b) a description of the development, including in particular -

² His Majesty's Stationary Office (HMSO) 2017. *The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (as amended in 2018 and 2020)*.

- (i) *a description of the physical characteristics of the development and, where relevant, of demolition works;*
 - (ii) *a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;*
- (c) *a description of the aspects of the environment likely to be significantly affected by the development;*
- (d) *to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from:*
 - (i) *the expected residues and emissions and the production of waste, where relevant; and*
 - (ii) *the use of natural resources, in particular soil, land, water and biodiversity; and*
- (e) *such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment"*

With regard to the EIA Regulations, the Proposed Development falls under the Description of Development in Schedule 2 10(b) of 'Urban Development Projects'. For this type of development, consideration must be given to whether the Site is located in a 'sensitive area' (see **Appendix 1**), or whether the associated relevant screening thresholds and criteria are met or exceeded.

The following sections and contents of this letter provide the relevant information required for consideration by the Local Planning Authority (in this case, the LBH).

The Site and Surrounding Context

The Site location and indicative planning application red line boundary is shown in **Figure 1** and can be identified using (National Grid Reference TQ 34439 89768).

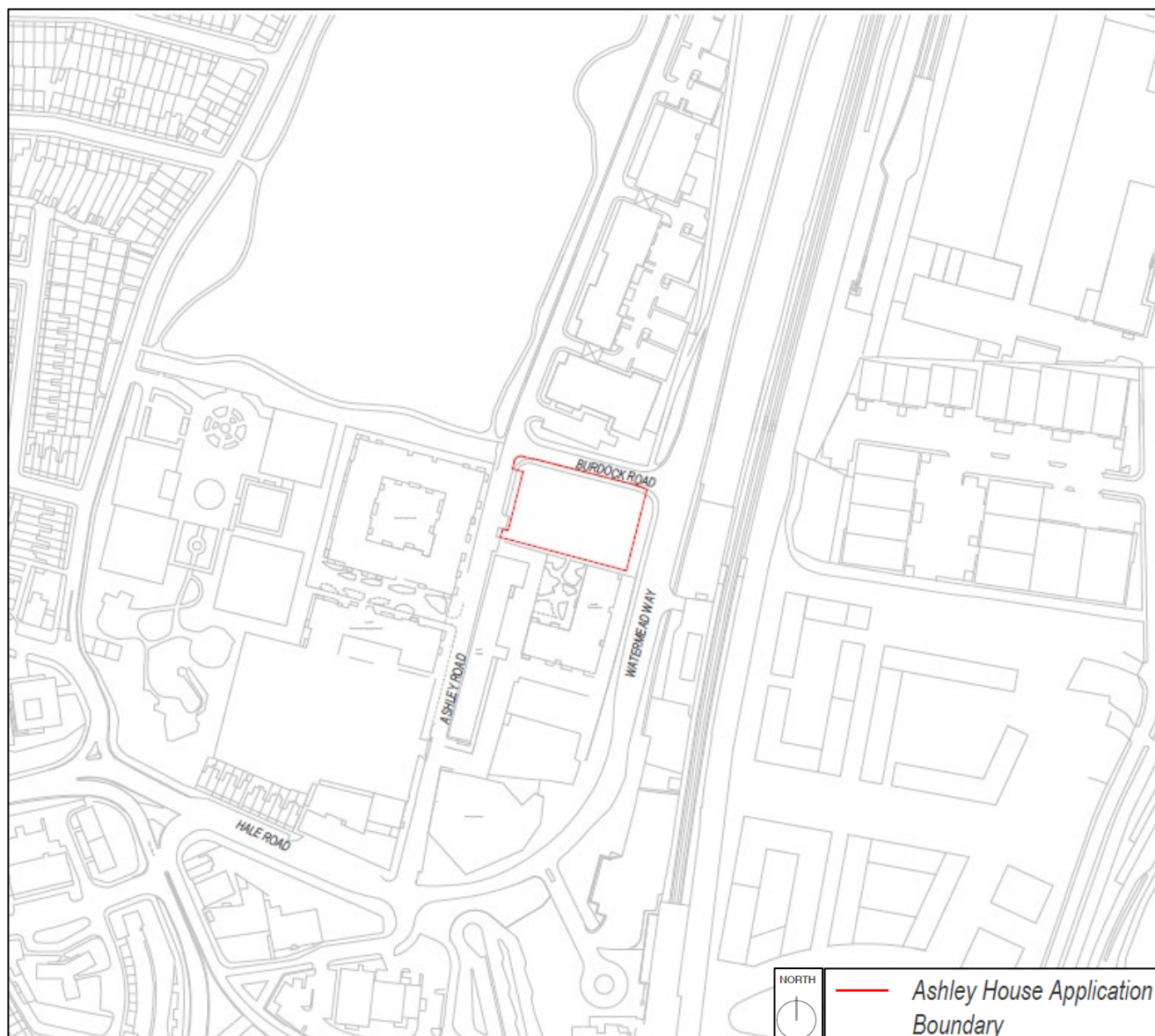
The Site is located within the administrative boundary of the LBH and is bordered to the:

- North by Burdock Road beyond which lies Harris Academy secondary school;
- East by Watermead Way (A1005), beyond which lies Network Rail offices and Tottenham Hale railway lines;
- The Gessner Apartments (residential) and Berol House (commercial) to the south; and
- Ashley Road (one-way street) and The Sessile apartments (residential) to the west.

The existing Site is secured by construction hoarding and has been cleared following implementation of Planning Application Reference: HGY/2016/4165 and RM HGY/2018/2353, confirmed lawfully implemented by LDC HGY/2023/1622, with crushed material still present on-site and small areas of scrub.

The Site is broadly rectangular in shape and is approximately 0.3 hectares in area.

Figure 1 Indicative Site Red Line Boundary (Not to Scale)



The wider surroundings of the Site include a mix of residential properties, commercial and educational uses, Down Lane Park, and the railway.

The surrounding area have been characterised by recent regeneration and development, in line with local and regional planning policy, including associated demolition works occurring on the Site in line with the planning permissions implemented or delivered across the Ashley Road South Masterplan, including Planning Application Reference: HGY/2016/41653: (and associated application NMA HGY/2018/2210, RMA HGY/2018/2353, NMA HGY/2022/4230 and NMA HGY/2023/0890) at Ashley House and Cannon Factory, as well as Ashley Gardens (ref. HGY/2017/2045) which delivered the Gessner and Rosa Luxemburg, and Berol Quarter (ref. HGY/2017/2044) which delivered the Gessner and subsequent applications (ref. HGY/2023/0261 (amended by S73 HGY/2025/0930)) which grants planning permission for the redevelopment of Berol House and 2 Berol Yard.

The surrounding area has also been subject to wider regeneration under the Statagic Development Partnership (Planning Application Reference: HGY/2018/2223) submitted in 2018 and approved in 2019. This contained 6 plots of which 4 out of the six plots have been completed. The remaining Plots (Plot B) is currently under construction with completion expected end of the summer and final occupation is autumn / winter whilst Plot F (the Pavillion) is understood not be coming forward at this time.

³ London Borough of Haringey Planning Portal. Available at: [Register View](#).

The whole borough was designated as an Air Quality Management Area (AQMA). LBH have designated an AQMA for the whole borough for exceedances of the annual mean nitrogen dioxide (NO₂), and 24-hour mean particulate matter (PM₁₀) AQO's.

There are no designated archaeological assets within the Site or in the immediate surroundings however, the Site does lie within an Archaeological Priority Area associated with the Lea Valley terrace gravels and former floodplain. This APA is classified as Tier 3 by the GLHER.

The Site does not lie within a conservation area and with no known heritage assets however, the surrounding area within a 1km radius from the Site includes several designated heritage assets comprising of conservations areas, listed and locally listed buildings. The closest designated heritage asset to the Site is Grade II listed No. 62 Monument Way, located approximately 530m south-west of the Site. The Site is located within Townscape Character Area 1: Tottenham Growth Area.

In relation to surrounding transport infrastructure, the Site lies within a PTAL 5, indicating the Site has a high level of accessibility to transport. The closest stations, both rail and bus, in proximity to the Site include Tottenham Hale station, Tottenham Hale bus station and Tottenham underground station which is approximately 250m from the Site. Main access to the Site is from Burdock Road (running parallel to the Site on its northern boundary). The main surrounding highway network includes Ashley Road (to the west) and Watermead Way (A1055). With the previous building having been demolished, there are no active trip-generating uses on-site.

The Proposed Development

A full (detailed) planning application will be submitted for the redevelopment of the Site to construct two buildings, likely to range in height from 8-25 storeys (with a maximum mAOD of approximately +85.5) containing purpose-built student accommodation (PBSA) with approximately 450 rooms, associated amenity and ancillary space (Sui Generis), and a hotel with up to approximately 170 rooms (Class C1) together with public realm, access, servicing, and other associated works. There is provision of commercial floorspace proposed within the PBSA block (Use Class E).

There are no basements proposed however, there is likely to be a 1.5m sunken slab beneath both blocks.

The Energy Strategy is likely to consist of Air Source Heat Pumps for heating and hot water. Ventilation for the student accommodation units and associated amenity spaces will be fitted with Mechanical Ventilation Units

The Proposed Development will be car-free with no car parking provided. Vehicle access for servicing and deliveries will be provided off Burdock Road (as per the existing access/egress route). Long and short-stay cycle parking will be provided on-site as part of the proposals.

Consideration of Significant Environmental Effects

The potential for significant environmental effects has been considered in respect of the construction works, and once the Proposed Development is complete and in operation. The following aspects of the environment have been considered:

- Air Quality;
- Archaeology;
- Climate Change;
- Daylight, Sunlight and Overshadowing, Solar Glare and Light Pollution;
- Ecology;
- Ground Conditions;
- Townscape and Visual Impact Assessment;
- Built Heritage;
- Noise and Vibration;
- Major Accidents and/or Disasters;

- Socio Economics and Health;
- Traffic and Transport;
- Waste;
- Water Resources and Flood Risk; and
- Wind Microclimate.

The review of the likelihood for significant environmental effects for each aspect of the environment is presented in **Appendix 2**.

In line with Regulation 6(2)(e), information has also been provided as relevant in Appendix 2 on *‘any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment’*.

Cumulative Effects

The EIA Regulations require that the potential for cumulative effects during either the construction or operation of a development project are considered in determining whether a development project is ‘EIA development’.

It is noted that the EIA Regulations only refers to *‘cumulation with other existing development and/or approved development’*. However, best practice dictates that cumulative assessments should have regard to other development projects which are ‘reasonably foreseeable’ (i.e. usually those under construction or with planning permission) with more limited consideration given to proposals for which determination is still pending. Such a review is only capable of being carried out based on publicly available information.

Other development projects that meet the following selection criteria have been reviewed to allow for the consideration of whether significant cumulative effects with the Proposed Development are likely:

- schemes that are subject to a high degree of certainty of being delivered (i.e. those that are reasonably foreseeable) or at early stage of construction;
- schemes located within 1.0km of the redline boundary of the site; and
- schemes which produce an uplift in gross floor area of ≥ 1 ha or schemes providing 150 residential units or more.

These are as follows:

- Berol Quarter, Ashley Road, London, N17 9LJ, London
- Strategic Development Partnership (SDP) Sites, Welbourne, North Island, Ferry Island, Ashley Road East and Ashley Road West, Station Road, London, N17, London – Plot B and Plot F
- 29-33, The Hale, London, N17 9JZ

Details of these schemes are set out in **Appendix 3**.

In addition to these schemes, whilst not a requirement of the EIA Regulations, consideration has also been voluntarily given to the emerging proposals at the nearby Ashley Road site, which is the subject of an EIA Scoping Opinion Request. This is due to the proximity between the two site locations, and the likely interest of consultees as to whether the two sites have considered each other in terms of potential combined environmental impacts. Consideration can only be based upon available information, and as such as has been based upon the information presented within the EIA Scoping Opinion Request, as set out within **Appendix 3**.

The outcome of the cumulative assessment review is also located within **Appendix 2**.

The Planning Application Technical Reports

As referenced within **Appendix 2** as relevant, the following technical reports which consider potential environmental impacts will accompany the future planning application:

- Acoustic Report;
- Air Quality Assessment;

- Archaeology Assessment;
- Ecological Impact Assessment (EcIA) Report and Biodiversity Impact Assessment;
- Construction Environmental Management Plan;
- Construction Logistics Plan;
- Contaminated Land Assessment;
- Daylight, Sunlight Assessment;
- Solar Glare Assessment;
- Delivery and Servicing Management Plan;
- Drainage Report (including Sustainable Drainage Systems (SuDS) Strategy);
- Flood Risk Assessment;
- Energy Statement;
- Health Impact Assessment;
- Heritage, Townscape, Visual Impact Assessment;
- Transport Assessment (including Travel Plan);
- Wind And Microclimate Assessment; and
- Shadow Habitat Regulations Assessment.

Summary Statement

The Proposed Development constitutes Schedule 2 Development and so needs to be screened by the local planning authority to determine whether the project constitutes 'EIA Development'. The Application has therefore submitted this EIA Screening Opinion Request to the LBH for its consideration.

As can be seen from the Consideration of Schedule 3 EIA Screening Criteria set out in this letter (**Appendix 2**), although some environmental impacts are expected to occur during the Proposed Development's implementation, they would be managed by adopting good practice and controls, such that sensitive receptors would not be permanently disrupted or harmed. Any environmental impacts would be localised and would be considered typical for development of a currently cleared and vacant site, and one which is subject to an allocation in an urban location.

The Applicant will submit a suite of individual environmental reports (as set out earlier in this document) to comprehensively assess the environmental impacts that could arise from the Proposed Development to satisfy planning requirements and allow the LBH to take a robust decision on the acceptability of the proposals.

In accordance with Regulation 6(6)(a), the LBH should adopt their EIA screening opinion within 3 weeks of the date of receipt of this request for an EIA screening opinion.

Kind Regards,

Rachel Naylor

Partner

For and on behalf of Trium Environmental Consulting LLP

Appendix 1: Sensitive Area Definition

Appendix 2: Consideration of the Environment

Appendix 3: Cumulative Schemes

Appendix 1: Sensitive Area Definition

Definition of 'sensitive area' within the EIA Regulations (within Regulation 2 – 'Interpretation')

"sensitive area" means any of the following—

- (a) land notified under section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981(23);*
- (b) a National Park within the meaning of the National Parks and Access to the Countryside Act 1949(24);*
- (c) the Broads (25);*
- (d) a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage (26);*
- (e) a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979(27);*
- (f) an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000(28) as confirmed by the Secretary of State;*
- (g) a European site."*

Appendix 2: Consideration of Schedule 3 EIA Screening Criteria

Aspect of the Environment	Review of the Potential for Significant Environmental Effects
Archaeology	The baseline information for the Site has been informed by a review of the Greater London Historic Environment Record (GLHER) data, as well as the National Heritage List for England (NHLE) and data from Haringey Council. The study area utilised comprised a 500m buffer from the Site. There are no designated archaeological assets within the Site or within immediate proximity. The Site is located within an Archaeological Priority Area associated with the Lea Valley terrace gravels and former floodplain. This APA is classified as Tier 3 by the GLHER as it covers a vast landscape with a perceived potential to contain in particular palaeoenvironmental remains associated with wetland and riverine environments, as well as associated prehistoric exploitation of this landscape. Whilst there has been no previous archaeological fieldwork at the Site, previous work has identified evidence for prehistoric and Saxon / Medieval / Post Medieval activity within the historic core of Tottenham Hale to the south; however, the Site was likely located beyond this historic core within an area of hinterland. Historic mapping suggests that the Site was utilised as pasture or arable land until mid-20th century development and further late 20th century redevelopment. It has since been entirely cleared of built form. It is very likely that the Site has experienced severe disturbance as a result of cumulative phases of 20th century development and demolition. This would have truncated any pre-20th century archaeological remains and reduced their importance in EIA terms. The Proposed Development will involve below ground works relating to the construction works associated with the new buildings, e.g. excavations/pilings/foundations. However, it is considered very unlikely that there would be significant effects to archaeological remains as a result of these works when considering that any surviving archaeology would most likely be truncated and of a negligible to low importance depending on its character and dating. With reference to the cumulative schemes set out within the main body of this report, no cumulative effects are likely to arise. Archaeological effects will be addressed by way of a full Archaeological Desk Based Assessment which will be submitted to support the future planning application, and if necessary, appropriate archaeological mitigation can be secured and undertaken through the planning process (via suitably worded planning conditions).
Ground Conditions	The baseline information for the Site and surrounding area has been informed by a Phase 1 Geotechnical and Geo-environmental Desk Study, which is nearing completion. Relevant environmental and historical information has been reviewed within appropriate study radii, extending up to approximately 1 km from the Site where applicable. The desk study undertaken to date has identified a number of potential ground-related constraints associated with the historical industrial use of the Site, Made Ground, groundwater, potential buried obstructions and nearby third-party infrastructure. These are however considered typical of a previously developed urban site and are expected to be manageable through appropriate further investigation, design and construction measures. During enabling and construction works associated with the Proposed Development, potential effects associated with contaminated soils, groundwater, excavation, piling, and ground movements would be managed through appropriate ground investigation, construction methodologies, monitoring and mitigation measures. The Phase 1 Geotechnical and Geo-environmental Desk Study will establish a preliminary Conceptual Site Model (CSM) and Preliminary Risk Assessment and inform the scope of the subsequent site-specific Ground Investigation. The Ground Investigation will be used to confirm ground and groundwater conditions and assess potential contamination risks. Ground investigations will be secured by way of a suitably worded planning condition, and construction related measures and mitigation would form part of a site-specific CEMP. Appropriate mitigation and management measures will be developed following completion of the Desk Study and Ground Investigation and incorporated into the design and construction methodology, where required. These may include measures for the management of contaminated soils and groundwater, dust and soil arisings, groundwater monitoring, ground movement and vibration monitoring, and appropriate procedures for unexpected contamination. Particular consideration will be given to adjacent buildings and infrastructure, including London Underground assets and existing Thames Water infrastructure. A detailed UXO risk assessment will also be required prior to intrusive works due to the elevated UXO risk identified at desk-study stage. Following completion of the Proposed Development, significant permanent effects associated with ground conditions and contamination are not anticipated, subject to completion of the recommended site-specific ground investigation and implementation of any remediation, foundation, groundwater or asset-protection measures identified as necessary through the subsequent assessment and design process. On this basis, significant adverse environmental effects in relation to ground conditions and contamination are not anticipated. With reference to the cumulative schemes set out within the main body of this report, no cumulative effects are likely to arise. Therefore, ground-related effects will be addressed through the Phase 1 Geotechnical and Geo-environmental Desk Study which will be submitted to support the future planning application, subsequent Ground Investigation and, where required, appropriate mitigation secured through the detailed design, construction process and/or suitably worded planning conditions.

Aspect of the Environment	Review of the Potential for Significant Environmental Effects
Traffic and Transport	The Public Transport Accessibility Level (PTAL) for the site is 5, indicating a high level of public transport accessibility. This is due to the close proximity of Tottenham Hale Station, Tottenham Hale Bus Station and Tottenham Hale Underground Station, together with the range of local bus services available in the immediate area. The surrounding highway network is formed primarily by Ashley Road, Burdock Road and Watermead Way. Ashley Road is a one-way route with a 20mph speed limit, while Burdock Road is a two-way local road. The area includes signalised junctions with pedestrian phases and forms part of a Controlled Parking Zone, specifically The Hale CPZ, which assists in managing on-street parking demand. Burdock Road will be maintained as the primary access/egress point for the site. Construction traffic will arrive at regular times over the course of a day to match the needs of the site and will be regulated by the site construction hours restricted to weekday and to lunchtime on Saturdays. The anticipated number of vehicle trips by construction traffic are likely to be of a level that can be managed uniformly across a day. There will be additional Heavy Goods vehicle movements accessing the site during the construction phase, but the nature of the local highways means that this additional activity will not be significantly noticeable to any sensitive receptor and can be managed to ensure HGV movements are restricted to appropriate roads and not local roads -. construction routing will use the Burdock Road/ Watermead Way junction to access the site, instead of using Ashley Road, this is the quickest route to the local highway network. HGV trips will also likely be scheduled outside of peak traffic hours, which will avoid additional potential congestion on the surrounding road network during these peak times. It is therefore not likely that any of the categories⁴ identified within the IEMA Guidelines for the Environmental Assessment of Road Traffic⁵, would require any further consideration or an assessment in an EIA. Suitable mitigation measures to ensure potential impacts on surrounding sensitive receptors (i.e. pedestrians, cyclists and other road users) are reduced would be designed and implemented through a Construction Logistics Plan (CLP) and/ or Construction Environmental Management Plan (CEMP). These documents would be secured and agreed with LBH via suitably worded planning conditions. It is also expected that construction workers would make use of public transport to get to and from the site due to the good availability of public transport options in the area, with no on-site parking provided. Due to the number of routes to and from the site via public transport it is expected that additional trips would be split across the network and would negligibly influence total passenger numbers. A Travel Plan would be prepared for the demolition and construction works to encourage sustainable travel to and from the site. With the implementation of good practice measures during the demolition and construction works, significant effects on sensitive receptors are considered unlikely from construction related traffic and transport. With regards to operational traffic, the traffic forecasts for the Proposed Development have been forecast using the industry standard TRICS database. There will be a very slight increase in vehicular trips of approximately 30-40 vehicular across the local network, but this is comparing against a vacant existing site condition with no associated trip generation. There is to be no parking proposed. The site is highly accessible, and the combination of no parking and excellent public transport encourages people to use other, more sustainable modes of transport minimising any impacts on nearby residential streets. In addition, there will only be low vehicle movements from delivery vehicles and taxis. This volume of trips is expected to be imperceptible on the wider network, and therefore unlikely to cause adverse effects relating to severance, pedestrian/cycle, vehicle and bus delay, and accidents and safety. The operational Proposed Development is not expected to generate or attract hazardous loads Following the completion of the development there is expected to only be minimal HGV movements to and from the site being limited to the weekly refuse collections. Therefore, it is not expected to result in changes that could affect perceptions of amenity, fear and intimidation given the nature of the surrounding highway network. In addition to trips generated directly by new residents themselves, an increase in delivery vehicles is expected. It should be noted however, that over the years, delivery companies such as DHL, FedEx, DPD etc. have invested heavily in route optimisation technology. As a result, new residents do not mean a proportional increase in delivery vehicle numbers i.e. if DPD is delivering to existing estate residents, they will not send entirely new vehicles to deliver to new residents as deliveries will be consolidated to reduce the operator's costs. The development will deliver new pedestrian and cycle improvements across the site creating improved permeability across the wider area, including traffic free spaces. The completed development is not expected to result in any changes that would significantly impact the public transport network. Whilst there would be an increase in public transport users during peak times, these would be split across multiple options across the transport network and so would be unlikely to result in a significant uplift in the network.

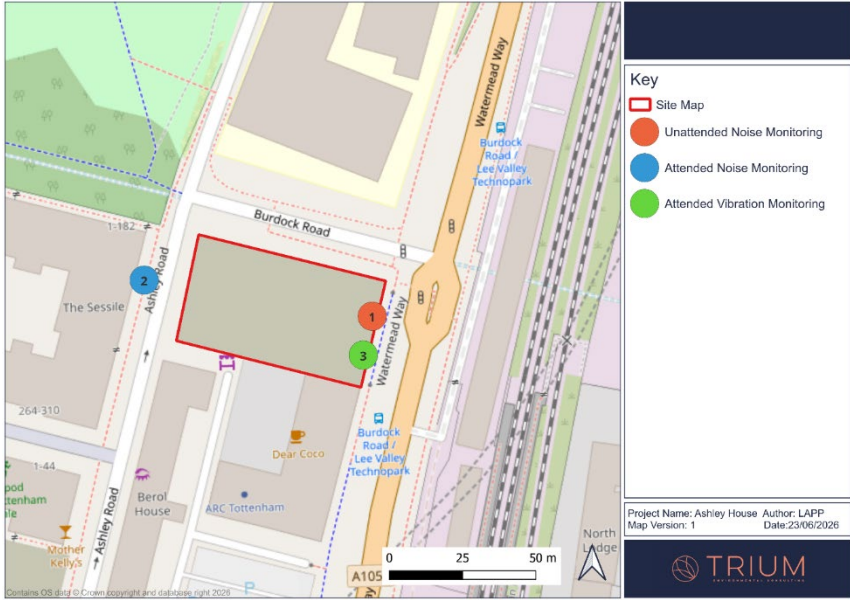
⁴ Severance of Communities; Road vehicle driver and passenger delay; Non-motorised user delay; Non-motorised amenity; Fear and intimidation on and by road users; Road user and pedestrian safety; and Hazardous / Large loads

⁵ IEMA, 2023. Guidelines for the Environmental Assessment of Road Traffic

Aspect of the Environment	Review of the Potential for Significant Environmental Effects
	Embedded mitigation measures and enhancements integral to the Proposed Development (embedded mitigation) will form part of the transport strategy, such as the new pedestrian and cyclist connections and cycle parking provision, in addition to large areas of new public realm. These will be detailed within the Transport Assessment (TA) which will be submitted to support the future planning application. Management plans required by planning policy will be prepared and will accompany the planning application. This includes a Framework Travel Plan, Outline Construction Logistics Plan and Delivery & Servicing Management Plan. These will be set out as part of the TA. With reference to the cumulative schemes set out within the main body of this report, no cumulative effects are likely to arise when considering the car free nature of the Proposed Development, and on the basis that should the construction periods of nearby sites overlap, logistics and traffic routing will be coordinated and managed as required, so that adverse effects do not occur to the local road network.
Air Quality	The site is in the Haringey Air Quality Management Area (AQMA), designated for annual mean NO₂, and 24-hour mean PM₁₀. It is also located close to one of the Greater London Authority's (GLA's) air quality Focus Areas; these are locations with high levels of human exposure where the annual mean limit value for NO₂ is exceeded. The site is not located in proximity to any significant industrial or waste management sources that are likely to affect the Proposed Development, in terms of air quality. The LBH currently operates automatic monitoring stations, measuring NO₂ concentrations, with two being located within 3km of the site (Haringey Roadside and Haringey Wood Green). Wood Green also monitors PM₁₀ and PM_{2.5}. A review of the monitoring data has shown that NO₂ concentrations at Haringey Roadside were below the NO₂ Air Quality Objective's from 2021-2024. Exceedances of the annual mean NO₂ Air Quality Objective's of 40µg/m³ were recorded at the Haringey Wood Green monitor from 2021-2024. All other AQO's for NO₂, PM₁₀, and PM_{2.5} from 2021–2024 were met at the Haringey Wood Green monitor from 2021-2024. Given the baseline air quality in the vicinity of the Proposed Development and the size of the site, HDVs during the construction programme are unlikely to exceed the EPUK/IAQM screening criteria⁶ in regard to annual average daily traffic (AADT) flows. Therefore, adverse effects as a result of construction traffic emissions are unlikely to be considered significant. Temporary generation of dust from site establishment, excavation and construction will be managed through the implementation of appropriate best practice management and control practices, construction dust would be minimised. Mitigation measures would be agreed with the LBH, and in accordance with IAQM guidance⁸ the use of effective mitigation measures is likely to ensure any residual effects would be not significant. Construction plant emissions such as the use of Non-Road Mobile Machinery (NRMM) during construction would also be temporary, localised, and compliant with LEZ NRMM standards. Any effects from NRMM would be not significant. The Proposed Development would be car-free, with the exception of Blue Badge parking. Provision would also be made for vehicle, cycle and pedestrian access arrangements, together with cycle storage in accordance with current policy requirements. The Energy Strategy is likely to be electricity-led and comprise air source heat pumps, which will not generate on-site emissions, and Mechanical Ventilation Heat Recovery (MVHR) for each unit. Emergency diesel generator(s) may be proposed for the provision of back-up power; however, only used for routine testing or during an outage. The location of any flue would ensure adequate dispersion away from sensitive receptors. If applicable, effects from emergency generator(s) would likely be not significant. Based on an expected low vehicle trip generation and the proposed energy strategy, in accordance with the Environmental Protection UK & IAQM, Land-Use Planning & Development Control: Planning for Air Quality⁷, the Proposed Development is not expected to give rise to significant air quality impacts. The effect of the Proposed Development on off-site human and ecological receptors would be not significant. Based on the pollutant concentrations observed in local monitoring, it is considered the AQO's are likely to be met for future users of the site. The effect of local air quality on future users of the Proposed Development would therefore be not significant. With reference to the cumulative schemes set out within the main body of this report, no cumulative effects are likely to arise. Should construction works overlap between the Proposed Development and the closest cumulative schemes, Berol Quarter and Ashely House, it is expected that like the Proposed Development, Berol Quarter and Ashley House would adopt suitable best practice measures to ensure no adverse effects relating to dust from activities or vehicle track out. An Air Quality Assessment will be submitted to support the future planning application, which will also outline the relevant mitigation measures and controls anticipated to be secured by planning condition.

⁶ Institute of Air Quality Management, Land-Use Planning & Development Control: Planning for Air Quality (January 2017), Available online: <https://iaqm.co.uk/guidance/>

⁷ Environmental Protection UK & Institute of Air Quality Management (2017), 'Land-Use Planning & Development Control: Planning for Air Quality', EPUK & IAQM, London

Aspect of the Environment	Review of the Potential for Significant Environmental Effects
Noise and Vibration	An environmental noise and vibration survey has been undertaken to establish baseline levels. Dominant noise sources are road traffic noise from Watermead Way and Hale Road, with less frequent traffic on Ashley Road and Burdock Road. Train movements from the railway line to the east of the site are occasionally audible but not dominant. Vibration from the railway's existing operation has been assessed to be low. The noise survey locations are presented in the below figure.  Noise sensitive receptors have been identified close to the site. The key receptors for assessment are residential dwellings on Ashley Road and Watermead Way, and the Harris Academy Tottenham school. These receptors are considered sensitive to noise and vibration during the construction and operational phases of the Proposed Development. With regards to construction noise, sensitive receptors are likely to experience differing scales of adverse noise effects. However, these effects would be temporary, associated with specific construction activities occurring intermittently. Noise and vibration will be managed as far as practicable through the implementation of Best Practicable Means (BPM), as defined in Section 72 of the Control of Pollution Act (CoPA) 1974. All works will be undertaken in such a manner as to reduce disturbance from noise and vibration to the necessary minimum. During the detailed development of the construction programme and preparation of the CEMP, appropriate best practice measures (BPM) to reduce potential noise and vibration effects at nearby noise-sensitive premises will be defined and agreed with LBH. These will include, as appropriate, measures relating to the CEMP and Construction Logistics Plan (CLP), such as site hoarding and acoustic screening, working hours, plant selection and working methods. The primary mechanism for the control of construction noise and vibration will be through Section 61 consent under CoPA. The Section 61 process will establish appropriate noise and vibration limits at nearby sensitive receptors, together with monitoring and reporting requirements. Regular engagement will also be undertaken with nearby sensitive receptors throughout the construction works. This will provide advance notice of potentially disruptive activities and enable particularly sensitive periods to be identified and where reasonably practicable, construction activities will be programmed or adapted to avoid or reduce disturbance. The appointed contractor will be required to implement BPM throughout the construction works and comply with the agreed Section 61 controls. The requirement for the implementation of BPM, preparation and implementation of the CEMP, and use of the Section 61 process can be secured through an appropriately worded planning condition. It is assumed that other nearby sites that are under construction at the same time as the Proposed Development would adopt these measures to ensure disturbance is minimised. During operation of the Proposed Development, commercial noise break-out from ground floor commercial units is expected to be controlled by the building facade. Operational building services plant noise limits will be set by LBH to be achieved by the Proposed Development at nearby noise sensitive receptors. Based on these limits being achieved, no adverse effect on nearby noise sensitive receptors is expected. The need to control operational noise from the completed development can be secured by the LBH via planning condition. Road traffic noise increases will be minimal, as the Proposed Development will be car free. An Acoustic Report will be submitted to support the future planning application, which will summarise the results of environmental noise surveys, identify plant noise limits, and provide outline assessments of noise impacts for the completed development.

Aspect of the Environment	Review of the Potential for Significant Environmental Effects
Water Resources and Flood Risk	The site is located within Flood Risk 2. The closest surface water resource to the site is the River Lea, located approximately 350m to the east of the site. Due to the distance of the water body and lack of linkages, effects to this water body are not likely. The closest surface water receptor to the site is Thames Water's Surface Water sewer, located approximately 20 meters east from the site. As only a small connection of a maximum of 2 litres per second is likely to be proposed, no significant effects to this receptor are expected. Thames Water asset maps also indicate a trunk sewer running directly beneath the site. This is likely to have a significant bearing on the design and positioning of any load-bearing piles, and so engagement with Thames Water is taking place to agree build-over and proximity requirements. Subject to that, permanent disruption to the asset or to downstream receptors would not be expected. The site sits within a Source Protection Zone. The scale of the construction works are not likely to generate significant adverse effects on flood risk, water quality or capacity. Standard mitigation measures relating to surface water management, drainage and waste, contamination prevention for ground water, and water usage, can be included in a CEMP (or equivalent) and, secured through a planning condition. T Once operational, the Proposed Development will include Sustainable Urban Drainage Systems (SUDS). Thames Water will be consulted in relation to foul and surface water drainage. Significant adverse effects on flood risk, water quality or capacity are not considered to be likely. Given the site sits within a Source Protection Zone, infiltration would not be proposed as part of the surface water drainage strategy. Attenuation with a restricted discharge to the public sewer network is likely to be the appropriate approach, and so any permanent effect on groundwater quality as a result is not likely. With reference to the cumulative schemes set out within the main body of this report, no cumulative effects are likely to arise. A Flood Risk Assessment and Drainage Report will be submitted to support the future planning application.
Ecology	The Site is not subject to any statutory or non-statutory nature conservation designation. Several internationally designated statutory sites lie within the wider area, including the Lee Valley Special Protection Area (SPA) and Ramsar site 450m east, and Epping Forest Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) 4.4km north-east. The closest non-statutory sites are the Down Lane Recreational Ground Local Site of Importance for Nature Conservation (SINC), approximately 15m north-west; and Tottenham Hale to Northumberland Park Railsides Borough SINC, 60m east. Scheduled work during the construction phase of the Proposed Development have potential for adverse effects on these non-statutory sites through noise and dust generation during trackout. However, these impacts can be mitigated through standard measures secured via a Construction Environmental Management Plan (CEMP), as well as adoption of best practice measures in line with the Institute of Air Quality Management (IAQM) guidance⁸. With these measures in place, the effects are not likely to be significant. Construction activities also have potential to generate dust and airborne emissions affecting these designated sites. An Air Quality Assessment is to be submitted in support of the future planning application, with the potential impact upon the Lee Valley SPA and Ramsar, Walthamstow Reservoirs SSSI and Epping Forest SAC & SSSI considered as required. However, with standard mitigation secured through a CEMP and best practice measures included the potential for significant air quality effects is considered unlikely. The Proposed Development could give rise to increased recreational pressure on nearby statutory designated sites. The Site falls within the Zone of Influence for recreational impacts on Epping Forest SAC SSSI, though Haringey contributes less than 1% of the SAC's visitors⁹ and the car-free nature of the Proposed Development reduces potential for impact. Recreational pressure on the Lee Valley SPA and Ramsar is not considered a significant issue as access across the site is either permit-controlled or actively managed by the London Wildlife Trust. The Site and adjacent off-Site areas support no notable Priority Habitats under the UK Biodiversity Action Plan (BAP) or ancient woodland (and no irreplaceable habitats). The nearest such habitat is deciduous woodland 15m north-west, in Down Lane Park. Semi-improved grassland, traditional orchard and open mosaic habitat also appear in the desk study but are all at least 1km away with no connecting habitat that leads onto the Site. The Site was largely cleared following demolition of the previous building in line with the extant consent and has since remained vacant and unmanaged. It now comprises mostly bare gravel and unsealed ground with scattered ruderal and ephemeral vegetation, and localised introduced shrub habitat in the south-eastern and south-western corners. A section of denser ruderal and ephemeral vegetation with a higher diversity of species is present along the northern boundary of the Site. Large, mostly unvegetated, compacted rubble mounds that are around 4m high dominate the eastern and western sides of the Site. Built linear features are also present in the form of paved footpaths on the northern part of the Site. These habitats are common in urban settings and of negligible biodiversity value overall, except for the introduced shrub and denser ruderal and ephemeral vegetation, which hold value only within the immediate survey area. The Site supports common colonising species, consisting primarily of a mix of ruderal vegetation, scattered, patchy grasses and scattered shrub typical of unmanaged urban land. The denser ruderal and ephemeral area along the northern boundary supports a greater diversity of species, though these remain common and widespread. This includes butterfly bush (<i>Buddleja davidii</i>), which is not listed as an invasive species on Schedule 9 of the Wildlife and Countryside Act 1981 but is considered as an invasive species within London. Consequently, the flora on Site is considered to be of biodiversity value within the immediate survey area only.

⁸ IAQM (2024) *Guidance on the assessment of dust from demolition and construction, Version 2.2. January 2024. Institute of Air Quality Management, London.*

⁹ Liley, D. (2020) *Epping Forest Visitor Survey (2019). Unpublished report by Footprint Ecology for Epping Forest District Council*

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	The site may offer limited nesting opportunities for urban birds within its shrub patches and margins. Standard mitigation including timing demolition outside the breeding season, or a precautionary ecologist check within 24 hours of works starting will avoid adverse impacts, with any active nests protected by a buffer zone until fledging. The Site is therefore considered of limited biodiversity value for birds within the immediate survey area. The Site offers negligible suitability for commuting or foraging bats, as the recently established vegetation has not had time to develop meaningful foraging resources, and negligible suitability for roosting bats as no roost features or suitable trees or structures are present. Protection measures through the CEMP and a sensitive lighting strategy will still be needed to avoid significant effects on bats using and commuting via the Site to the nearby off-Site deciduous woodland. Given the nature and scale of the Proposed Development, the limited presence of habitats of any ecological value and limited suitability for protected species, the overall ecological value is at Site Level only. It is considered that, with appropriate mitigation measures applied during the construction and operational phase which will be detailed within an Ecological Appraisal which will be submitted to support the future planning application, impacts on biodiversity are not likely to be significant. With reference to the cumulative schemes set out within the main body of this report, no cumulative effects are likely to arise.
Daylight, Sunlight and Overshadowing, Light Pollution and Solar Glare	The site currently comprises of a vacant site, following the demolition of the former low-rise industrial building. Immediately to the north is the low-rise Harris Academy Tottenham, and to the northeast is the Lockwood Industrial Park, comprised of low-rise industrial or commercial uses. To the north-west is Down Lane Park. To the west is commercial uses comprising Network rail buildings. To the south is the part 2 part 5 storey commercial building Berol House. Also to the south is The Gessner Apartments, a part 12, part 13 and part 14 storey residential building, along with its associated public realm. To the west of the site is The Sessile, a part 8, part 10 storey residential building. For daylight and sunlight assessments, the primary focus is on residential receptors where the requirement for natural light is considered the strongest. Notwithstanding this, other uses such as schools and hospitals are also considered sensitive, as they also have a reasonable expectation for natural light. Given the vacant nature of the site, the majority of surrounding residential buildings will currently receive relatively high levels of daylight and sunlight for an urban area. There are some surrounding receptors which sit in high density, and these properties experience lower levels of daylight and sunlight, especially where they are served by overhanging balconies. With regards to the relevant existing surrounding outdoor amenity areas, there is the central amenity area within the Sessile Apartments to the west, as well as Down Lane Park, which ranges from the west to northwest, which have the potential to be affected. There is an amenity area associated with The Gessner Apartments immediately to the south, however due to its orientation, this will be unaffected. As the existing site is vacant, there will be limited sources of artificial lighting which have the potential to cause light spill to neighbouring sensitive uses. The train tracks to the east approaching and departing Tottenham Hale Station, sit approximately 50m from the Proposed Development such that the Proposed Development is unlikely to sit within 30 degrees of the train drivers' focal point in either direction, and so solar glare effects would not be expected. The construction works associated with the Proposed Development are considered to be less relevant for Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare, as the completed Proposed Development presents the worst-case assessment, given that the Proposed Development will be fully built out to its greatest extents in this scenario. Therefore, a quantitative assessment of the effects associated with the demolition and construction phase is not necessary, as the likely impacts would be the same or less than those described in the Completed Development scenario. In the Completed Development scenario, the Proposed Development will introduce new buildings onto the site of various heights and massing. These new buildings have the potential to affect daylight and sunlight levels to existing surrounding receptors, as well as overshadowing to surrounding amenity spaces. The Proposed Development has been subject to design stage testing to inform the design and reduce impacts on Daylight, Sunlight and Overshadowing. In regard to Daylight and Sunlight, the impacts are likely limited to a small number of the most proximate receptors, which include The Gessner Apartments, Sessile Apartments and the Harris Academy Tottenham. Initial assessments suggest that the impacts are in line with those typical for an allocated site for development in a central urban development area such as this, and in line with precedent elsewhere within London and the Tottenham Hale site allocation. Mitigation has been embedded in the scheme through the design process to help minimise the impact on neighbouring receptors through design. With regard to Overshadowing, the impacts will be limited to Down Lane Park and the public realm within the courtyard of Sessile Apartments. Significant effects are not expected to either space due to the nature of the Proposal and its offset position from these receptors. In respect of Cumulative impacts, the proposal sits within 100m of the emerging Ashley Road proposals and the Berol Quarter consented scheme, and such has the potential to present cumulative impacts to neighbouring properties. Notwithstanding the schemes proximity to one another, they are sufficiently offset in orientation such that they are unlikely to effect the same elements of the neighbouring properties. The Ashley Road emerging proposals sit to the southwest of the Cannon Factory site and as such whilst both schemes may be visible from the The Gessner and Sessile Apartments, they will be seen from different facades and therefore different blocks and units within these receptors would be affected. The Berol Quarter proposals also sit to the south of the Cannon Factory site and again, this is only likely to affect the southern facades of the Sessile Apartments and The Gessner, whilst the Cannon Factory proposals will only have the potential to affect the northern facades of The Gessner, and the eastern facades of the

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	Sessile Apartments. Therefore, these schemes are not considered likely to cumulatively interact, and no further consideration is required With regard to light pollution, the Proposed Development is unlikely to generate significant light spillage effects as the typical use of residential lights is likely insufficient to cause nuisance light spillage, and the primary function and lighting design of the hotel will not be dissimilar from traditional residential uses, where the primary function of the rooms are for sleeping and so the lighting is not likely to generate significant light spill and the use of blinds / curtains will further mitigate this. There are no industrial uses proposed within the scheme and specialist lighting, such as flood lights, is not required. As such, it is considered that the impact of the Proposed Development in relation to light spillage will not be significant. It is assumed that a detailed lighting strategy will form a planning condition attached to the planning permission, if consented. As part of such a future planning condition, the lighting strategy will be designed to ensure that the fully complete and operational development is compliant with the 'ILP Guidelines 10. Compliance with the ILP Guidelines ensures that any obtrusive light (nuisance) and spill light as a result of the Proposed Development will be within the recommended levels as to not cause a nuisance or adversely affect the receptors. Therefore, no significant light spill effects will occur. With regard to Solar glare, as noted above whilst the proposal sits in proximity to the train tracks approaching Tottenham Hale Station, this is c.50m to the east and so the proposal will be at too great of an angle from the drivers focal point to cause significant glare issues. The proposal is also surrounded by a number of minor roads and the dual carriage way A1055 (Watermead Way). In terms of decision points for car drivers, there is only one main junction on this primary road, a set of traffic lights where Burdock Road meets the dual carriage way. As this junction is in such proximity to the proposals, it is not considered likely to present significant glare issues, as the drivers will be able to look at traffic lights away from the proposal. Whilst the potential for significant glare is considered to be very low, this will be assessed separately and submitted to support the future application. A Daylight, Sunlight, Overshadowing and Solar Glare Report will be submitted to support the future planning application to consider the potential daylight and sunlight effects on receptors and the associated amenity spaces where relevant, as well as Solar Glare. Therefore, the local planning authority will have the full information before them to make a reasoned judgement on the planning application, in regard to potential daylight, sunlight, overshadowing and solar glare effects. As discussed above, the anticipated effects to neighbours are commensurate of that which would be expected within a site which is currently cleared of any built form, and within an urban area, particularly relating to a site subject to an allocation.
Townscape and Visual	The Site falls within a number of significant strategic planning designations, including: Upper Lee Valley Opportunity Area; Tottenham Hale District Centre; Tottenham Area Action Plan; and Tottenham Housing Zone. Collectively, these policy designations support substantial growth, regeneration and housing delivery within Tottenham Hale, establishing the area as one of London's key regeneration and intensification locations. The wider planning framework promotes mixed-use redevelopment, tall buildings in appropriate locations, improved connectivity, and the creation of a new metropolitan centre around Tottenham Hale Station. The Site is located within Townscape Character Area 1: Tottenham Growth Area, an area that has undergone substantial change in recent years and continues to experience significant regeneration and redevelopment. The Proposed Development presents an opportunity to improve the townscape function and appearance of the Site, whilst strengthening its integration with the established and emerging neighbourhood. The proposals have the potential to contribute positively to the streetscape by introducing visual interest and increasing the diversity of the built environment. The visual study area has not been defined by a radius, although representative viewpoints proposed for assessment have been informed by a site visit, the location of heritage receptors, townscape considerations, and any views identified in the statutory development plan. The viewpoints have been further refined through the preparation of a zone of theoretical visibility (ZTV) for the Proposed Development up to 2sqkm from the centre of the Site, using VU.CITY software. Through consultation with the LBH, additional views were requested, which were duly explored and added into the visual scope. The Proposed Development is anticipated to have a beneficial effect on the visual amenity experienced by local residents and people moving through the area. From a number of locations, views are already characterised by existing tall and large-scale development. Where visible, the Proposed Development would be appreciated as part of the wider cluster of existing and emerging taller buildings associated with the ongoing transformation of Tottenham Hale, contributing to the area's evolving character and townscape composition. Where visible, the Site is located at distance from the nearest heritage assets, with the exception of the former the Eagle Pencil Factory. The heritage assets exist within a context already influenced by modern tall buildings, experienced over distance and incidental to the significance. The proposed redevelopment of the Site is unlikely to result in harm to heritage assets through changes to their setting. Accordingly, significant effects on the heritage assets are considered unlikely. In townscape terms, the immediate area is undergoing significant transformation in accordance with strategic planning objectives for Tottenham Hale and the wider Upper Lee Valley Opportunity Area. The Proposed Development is to be designed with careful regard to the existing and emerging townscape context, seeking to provide a contemporary and well-considered architectural response. Any changes arising from the proposals would be experienced within the context of ongoing regeneration and the established trajectory of growth and intensification across the Tottenham Hale area. From the wider townscape receptors, the principal effects are likely to be from areas of intervisibility. Where visible, the Proposed Development would be viewed in conjunction with existing and emerging tall and large-scale buildings across Tottenham Hale and would contribute to the evolving townscape as a complementary component of the area's planned

¹⁰ 2021, Institute of Lighting Professionals: Guidance Note 1 The Reduction of Obtrusive Light'

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	growth and regeneration. In this context, it is not anticipated that the Proposed Development would result in substantial or permanent disruption to the character of the wider townscape during construction or operational scenarios, with the proposals being experienced as part of the area's continuing programme of growth and regeneration. Visually, the Proposed Development would be apparent in a range of local views, although it is not situated within any London View Management Framework view corridors or the views and vistas identified within the Urban Characterisation Study (2015) in which the Site is not located within any of the identified viewing corridors. A view from Alexandra Palace is provided for completeness, although the panorama is oriented east, away from the Strategically Important Landmark (St Paul's Cathedral), towards the Site. Any visual effects experienced during the enabling and construction works would be temporary in nature and limited to the duration of those activities. Once completed and operational, the Proposed Development would be experienced within the context of the existing and emerging pattern of development across Tottenham Hale and would not result in harm to visual receptors or their visual amenity. As a whole, the Proposed Development will affect the townscape and visual amenity experienced by receptors within the surrounding area. However, these changes are expected to be beneficial to the character and function of the townscape and are considered wholly commensurate with the emerging context of high-density development across Tottenham Hale's strategic growth and regeneration area. When considered alongside consented, under-construction and emerging cumulative schemes, including the emerging Ashley House redevelopment proposals, the Proposed Development would contribute to the continued evolution of the townscape character, reinforcing the area's transition towards a denser and more urban environment. Collectively, these developments would support the strategic objectives for growth and regeneration within Tottenham Hale area. A Heritage, Townscape, and Visual Impact Assessment (HTVIA) will be produced and submitted to support the future planning application, which will assess the effects of the Proposed Development on built heritage, townscape character and visual receptors. The HTVIA will include Accurate Visual Representations (AVRs) prepared by a specialist visualisation company and will be undertaken in accordance with relevant planning legislation, policy, and guidance.
Built Heritage	The (built) heritage assessment describes the significance of any heritage assets affected by the Proposed Development, including any contribution made by their setting. The heritage assessment will be carried out in accordance with the Historic England guidance documents GPA2: Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) and GPA3: Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition) (Historic England, 2017). The Site is not located in a conservation area and does not comprise any heritage assets. There are heritage assets within the surrounding area up to 1km from the Site, comprising of conservation areas, listed buildings and locally listed building identified on the LBH Local list; however, these are generally located at least 500m from the Site boundary. Consideration has also been given to heritage assets located beyond the defined study area; this includes designated assets of higher grading, as well as the Grade II listed Drapers' Almshouses which has been specifically identified by the LBH during pre-application discussions due to the alignment of Bruce Grove and the open nature of their courtyard arrangement. The closest designated heritage asset to the Site is No. 62 Monument Way, located approximately 530m south-west of the Site at its nearest point. No. 62 Monument Way is a Grade II listed late 18th-century three-storey house with a basement, built in brown brick with a stone-coped parapet. The building retains sash windows with gauged red brick arches and a decorative Georgian entrance with a radial fanlight and classical doorcase. A two-storey rear extension dates from the mid- to late-19th century. Beyond this, the nearest designated heritage assets are located at a distance of approximately 600m or greater from the Site. These assets are primarily concentrated along the historic routes of High Road and Bruce Grove, with the wider townscape comprising a limited number of more isolated designated heritage assets. There are a number of non-designated heritage assets on the LBB Local List within 1km of the Site, the closest being No. 25 Berol House (formerly the Eagle Pencil Factory), located south of the Site on the western side of Ashley Road. Constructed in 1907, the locally listed former industrial building is a long red and yellow brick structure characterised by a regular bay rhythm, pilasters, corner towers and a prominent central gable. Retained as part of the wider Berol Quarter regeneration scheme, it has been reused to provide flexible workspace and retail accommodation, with new development of varying heights, including towers of up to approximately 30–32 storeys. Where visible, the Site is located at distance from the nearest heritage assets, with the exception of the former the Eagle Pencil Factory. The heritage assets exist within a context already influenced by modern tall buildings, experienced over distance and incidental to the significance. The proposed redevelopment of the Site is unlikely to result in harm to heritage assets through changes to their setting. Accordingly, significant effects on the heritage assets are considered unlikely. Given the separation distances involved between this site and the potential future developments coming forward within the locality, as well as the established context which already accommodates substantial tall and large-scale development, the change arising from the Proposed Development in addition with emerging future schemes would be unlikely to materially alter the significance or appreciation of heritage assets. As stated above, heritage will be assessed within the Heritage, Townscape, and Visual Impact Assessment (HTVIA) which will be submitted to support the future planning application.
Socio Economics and Health	The scale of the works will not generate significant effects in respect of socio-economics or health considerations either during the construction works or on completion and occupation of the Proposed Development. The likely benefits relate to temporary job creation during construction, job creation during operation (including the approximately 170 room hotel), and local spending from additional workers, students, and hotel guests. Whilst there

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	will be beneficial effects relating to these aspects of the scheme, they would not be at scale which would result in significant beneficial effects. As the residential element is entirely PBSA, there will be no traditional residents or demand on local schools. Any increased use of local health facilities (such as GPs) is unlikely to be significant given the student demographic (including the consideration that students may stay with their pre-existing GPs), as well as the scale of the PBSA provision. With reference to the cumulative schemes set out within the main body of this report, no significant cumulative effects are likely to arise.
Climate Change	Based on the scale of the Proposed Development and the uses proposed, in the context of relevant greenhouse gas emission benchmarks and budgets and the fact that the Proposed Development will incorporate carbon mitigation measures (committed to within the Energy Statement, which will be submitted to accompany the planning application), it is considered unlikely that the contribution of GHG emissions associated with the Proposed Development (including embodied carbon within materials and operational carbon emissions) would lead to material changes in climate conditions over the life of the Proposed Development. In terms of the impact of climate change on the Proposed Development itself, the Proposed Development will incorporate into the design climate change resilience measures, particularly with regard to the energy strategy and flood risk. As such, it is considered unlikely that potential impacts from changes in climate conditions would result in significant effects on the Proposed Development.
Major Accidents and/or Disasters	The only major accidents or disasters that could potentially be considered 'likely' and which are relevant to the Proposed Development are flood risk (which has been considered above) and fire risk (which will be managed through building design in accordance with relevant British Standards) and are therefore not considered to be significant effects. A Flood Risk Assessment and Drainage Strategy is being produced to support the future planning application.
Wind Microclimate	Within the Greater London area, the dominant wind direction is from the southwest. The Proposed Development comprises redevelopment of the Site to provide two main buildings, a podium, along with active frontage with amenity on the ground level. Pedestrian level wind effects of a magnitude capable of being significant in EIA terms are typically associated with buildings that are substantially taller than their surroundings and which introduce large, exposed areas of public realm, which is not the case for the Proposed Development. The Site lies to the north of the Tottenham Hale area, with built-up urban context in which the surrounding built form is of broadly comparable scale to that proposed, particularly to the south and south-west. This is particularly important due to shelter that would be provided from the dominant winds. The magnitude of wind microclimate effects, and the circumstances in which detailed assessment are warranted, are well established in practice, including through the Lawson Comfort Criteria. A wind assessment will be undertaken of the Proposed Development (both in isolation, and when considering cumulative schemes) and where there are raised winds, mitigation will be developed to ensure no significant environmental wind effects are present, and locations are suitable for their intended use. This process will be reported upon with a Wind Microclimate Report, which will be submitted to support the future planning application.
Waste	In accordance with best practice measures, a Construction Method Statement (CMS) will be prepared, which will include details of the types of waste stream that will likely be generated on-site throughout the construction works, along with the relevant recycling / disposal route. Waste minimisation strategies incorporated in the design and procurement strategy, and information on how waste will be managed during the construction works (e.g. the employment of the waste hierarchy strategy, to minimise the volume of waste produced and to divert waste from landfill as far as possible) will also be outlined within the CMS. A Delivery and Servicing Management Plan (DSMP) will also be produced for the Proposed Development once operational, which would detail the waste storage and waste collection / management system to be incorporated into the Proposed Development, to mitigate any impacts due to waste. The scale of the construction works, and Proposed Development (once operational), will not generate substantial amounts of construction or operational waste. Therefore, it is anticipated that significant waste effects are not likely to arise as a result of the Proposed Development.

Appendix 3: Cumulative Schemes

[illegible]

		• Up to 500m2 of commercial/employment and community floorspace (Use Class E and F2) will be split at the ground floor levels of the shared-living and affordable block; • Landscaping and new public realm; • The Proposed Development will be car free with the exception of blue badge parking. Provisions will be made for vehicle, cycle and pedestrian access arrangements as well as cycle storage in accordance with current policy requirements; • The Energy Strategy is likely to be electricity-led and consists of Air Source Heat Pumps (ASHP). Mechanical Ventilation Heat Recovering Units are expected to be provided for each of the units; • Provision will be made for a mix of publicly accessible and private open space, including children's playspace; and • No basements are proposed however, there will be a sunken slabs.		
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