Georgia Crowley
Lichfields
The Minster Building
21 Mincing Lane
London EC3R 7AG

Our ref: HGY/2026/2329
Contact: Philip Elliott

Date: 23/10/2026

Dear Georgia

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017

Location: **Cannon Factory, Ashley Road, Tottenham, London, N17 9LJ**

Proposal: **Pursuant to Regulation 6 of the EIA Regulations please find attached a formal request for the Council's EIA Screening Opinion for the proposed development at the Cannon Factory.**

Proposed Development: **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.**

Thank you for the screening opinion request in relation to the development above, which was received on 17/08/2026 by the Local Planning Authority.

Officers consider there is sufficient information provided for the Local Planning Authority to adopt an opinion and a Screening Opinion in relation to the proposed development is set out below. Pursuant to Regulation 5(5) and having regard to the information submitted, the Local Planning Authority has adopted the Screening Opinion that **the proposal is not EIA development** as described in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 **and an Environmental Statement is not required to accompany a planning application**.

This screening opinion has been considered in the context of the Environmental Impact Assessment Regulations 2017 as a whole. The Local Planning Authority has considered the potential environmental impact of the above development in accordance with the above Regulations, having regard to the selection criteria for screening specified in Schedule 3 of the Regulations and the guidance to these Regulations set out in the National planning practice guidance (PPG).

The Council (LB Haringey) hereby determines that the proposed development is not likely to have a significant effect on the environment and that an Environmental Impact Assessment is therefore not required. However, it must be noted that this response is specific to this development proposal. Any material alterations to this proposal will require a further EIA screening. The Council's assessment has been informed by the third-party review carried out by Ramboll on behalf of The Council attached at Appendix 2. All consultee responses received are attached at Appendix 1.

Yours sincerely

Catherine Smyth
Head of Development Management and Planning Enforcement
Planning Service

SCHEDULE 2 DEVELOPMENT SCREENING OPINION
TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017

Conclusion of Screening Opinion review

The proposed development would comprise a high-density residential and hotel development on a small, previously developed urban site within the Tottenham Hale growth and regeneration area.

Its principal environmental impacts and effects would arise from the height and massing of buildings of up to approximately 25 storeys, associated construction activity, increased occupation and activity, and its relationship with existing and emerging development.

Many potential effects are likely to be localised and capable of being addressed through established assessment, design, mitigation and planning controls. These include construction dust, land contamination, waste, operational air quality, drainage, operational noise and resource use.

Subject to further environmental assessments and securing relevant mitigation measures, we are of the view that likely significant effects can be avoided, and an EIA can be screened out for the planning application.

It is recommended the Applicant provides the following information as part of the planning application to ensure that LB Haringey have the requisite environmental information and reassurance that the necessary mitigation measures are proposed to avoid likely significant effects:

- An ecological assessment identifying potential pathways to Walthamstow Reservoirs SSSI, Lee Valley SPA, Lee Valley Ramsar site and Epping Forest SAC.
- A Shadow Habitats Regulations Assessment where necessary to establish whether likely significant effects on a European site can be excluded.
- An Archaeological Desk-Based Assessment meeting the requirements identified by GLAAS and informed by relevant geotechnical information.
- The Zone of Theoretical Visibility used to define the heritage and visual study areas.
- A Heritage, Townscape and Visual Impact Assessment methodology identifying the proposed study areas, receptors and viewpoints and addressing Historic England's comments.
- Further transport information addressing construction vehicle movements by phase, peak and school-hour restrictions, operational trip generation, servicing, deliveries, taxis, Blue Badge provision, student move-in and move-out periods and effects on Harris Academy.
- An Outline Construction Logistics Plan demonstrating that the proposed construction access and vehicle movements are deliverable.
- Sufficient wind, daylight, sunlight, overshadowing, solar-glare, noise and vibration assessment and mitigation information to demonstrate that there will be no long-term significant effects.

For each of the relevant standalone topic assessments that will accompany the planning application – i.e. wind microclimate, daylight and sunlight and heritage, townscape and visual assessments - it is recommended that a cumulative scenario is included to make sure combined impacts and effects are understood by The Council as part of the planning determination process. It is also recommended that any outline construction environmental management plans and construction logistics plans are consulted with The Council and take into account measures to avoid likely significant effects related to cumulative schemes.

Based on the assessment of the criteria in Schedule 3 and pursuant to Regulation 5(5) and having regard to the information submitted, the Local Planning Authority has adopted the Screening Opinion that **the proposal is not EIA development** as described in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and thus **an Environmental Statement is not required** with any subsequent planning application.

Appendix 1 – Consultation Responses

Representations (9)

1. Environment Agency

Received: 14 September 2026
Comment:
Inappropriate consultation

Thank you for consulting us on the above application, received on 19/08/2026.

We have no comments to make in respect of the proposed development. This consultation is inappropriate, and we did not need to be consulted because: Other - EIA Screening opinions fall outside of our external consultation matrix

If you require any additional information, or want to discuss these matters further, please contact us.

2. Greater London Archaeological Advisory Service (GLAAS)

Received: 07 September 2026
Comment:
Recommend Pre-Determination Archaeological Assessment

Thank you for your consultation received on 19 August 2026.

The Greater London Archaeological Advisory Service (GLAAS) give advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

Assessment of Significance and Impact

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [77751] Area: The Lea Valley

The site of the proposed new build appears largely undeveloped in the modern era. Its Enfield Silt geology preserve prehistoric and later activity elsewhere in the borough, including just to the south at Ferry Island and North Island. The First Edition OS shows a possible fossilised linear route, preserved as a parallel field boundaries and planting, crossing the site from Hale Farm which lies under Down Lane Recreation Ground, down to the Lea.

Any EIA Scoping Report or full planning application should be accompanied by an Archaeological Desk Based Assessment which discusses the survival and levels of brickearth on the site, in conjunction with geotechnical investigation results if appropriate.

Planning Policies
NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 207 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. A field evaluation may also be necessary.

NPPF paragraphs 212 - 215 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non-designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 216). Conservation can mean design changes to preserve remains where they are.

NPPF paragraphs 202 and 210 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Applicants should therefore expect to identify appropriate enhancement opportunities.

If preservation is not achievable then if planning consent is granted, paragraph 218 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Archaeological consultants can advise on the possible implications of such mitigation requirements for the development programme and costs.

Recommendations

I have looked at the information you have supplied and at the Greater London Historic Environment Record. I have recommended below what more information I would need to advise the planning authority on the effects on archaeological interest and their implications for the planning decision.

I therefore recommend that the following further studies should be undertaken to inform the preparation of proposals and accompany a planning application:

Desk Based Assessment
Desk-based assessment produces a report to inform planning decisions. It uses existing information to identify the likely effects of the development on the significance of heritage assets, including considering the potential for new discoveries and effects on the setting of nearby assets. An assessment may lead on to further evaluation and/or mitigation measures. All desk-based assessments should include a search of the Greater London Historic Environment Record.

I will need to agree the work beforehand and it should be carried out by an archaeological practice appointed by the applicant. The report on the work must set out the significance of the site and the impact of the proposed development. I will read the report and then advise you on its implications for the planning application.

This advice relates solely to archaeological considerations, is provided without prejudice to the local authority's decision-making role, and may be shared with the local authority on whose behalf it is given. You should also consult Historic England's Development Management team on statutory matters.

3. Historic England

Received: 03 September 2026
Comment:
Thank you for your letter of 20 August 2026 regarding a request for a Screening Opinion in respect of an Environmental Impact Assessment (Trium, August 2026) for the proposed redevelopment of former Cannon Factory site, between Watermead Way, Ashley Road and Burdock Road, Tottenham in Haringey.

The information provided indicates that the proposals would involve the demolition of the structures on site and the development of two new buildings ranging between 8-25 storeys, with a maximum height of 85.5m AOD, to accommodate student accommodation units and a hotel.

The report explains that the development site does not contain any designated heritage assets, and that there are no locally listed buildings within the site. The nearest listed building is the Grade II listed 62B Monument Way, located approximately 530m to the west of the site.

Given the heights of the structures associated with the proposed development and the surrounding landscape character, this development is likely to be visible across a very large area and could, as a result, affect the significance of heritage assets at some distance from this site itself.

We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

It will be for your Council to determine what should be included in an EIA Screening in light of this report, and to be satisfied that no impact on important or protected views would result from these proposals. We

suggest that a Zone of Theoretical Visibility Study would help determine the extent of impact on the historic environment.

We recommend that any additional viewpoints to be considered in the assessment are agreed in consultation with your Council's Conservation Officer. Appraisals and management guidelines for nearby and more distant conservation areas may identify specific viewpoints relevant to these proposals, and these should also be considered.

We await further consultation from your Council in the event of an application being submitted, or from the developers at pre-application stage. If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Please note that these comments do not address archaeology. Please contact the Greater London Archaeological Advisory Service (GLAAS) for advice on these matters.

4. LBH Carbon Management

Received: 14 September 2026
Comment: The development should model wind impacts with future weather modelling too.

5. LBH Flood & Water Management Lead

Received: 21 September 2026
Comment:
Thank you for consulting us on the above application reference number HGY/2026/2329 for Request for an Environmental Impact Assessment ('EIA') Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), 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') at Cannon Factory, Ashley Road, Tottenham, London, N17 9LJ

Having reviewed the applicant's submitted EIA screening Opinion report letter dated 14th August 2026 as prepared by Trium Environmental Consulting LLP and as mentioned within the Appendix 2 of the above documents, we can confirm that the application does not currently include a Flood Risk Assessment (FRA) or Drainage Strategy. As part of any future Outline or Full Planning Application, the applicant will be required to submit an FRA and Drainage Strategy demonstrating the following:

1. The proposed development will not result in an increase in surface water runoff from the site. Drainage calculations should therefore be provided to establish the pre- and post-development runoff rates, assess the impact of any increase in impermeable area, and identify the attenuation volumes required to appropriately manage runoff from the developed site.

2. Detailed hydraulic calculations should be submitted, together with a drainage network layout clearly cross-referencing all drainage components. The assessment should consider the full range of design storm events, up to a seven-day duration, using industry-standard software such as Micro-Drainage or an equivalent approved modelling package.

The modelling should demonstrate that No surcharge occurs within the drainage system during the 1 in 1 year rainfall event; No flooding occurs on-site during the 1 in 30 year rainfall event; and any exceedance flooding during the 1 in 100 year rainfall event, including the appropriate climate change allowance, is safely contained within designated areas without posing a risk to buildings, critical infrastructure, neighbouring land, or site users. Critical storm analyses and supporting model outputs should also be provided.

3. The applicant should use the latest Flood Estimation Handbook (FEH) rainfall data for all hydraulic modelling and drainage calculations. The use of the older FSR rainfall methodology will not be accepted for this assessment.

4. Evidence should be submitted confirming that a suitable and agreed point of discharge is available for the proposed surface water drainage system.

5. Any overland flow routes generated as a result of the development should, wherever practicable, follow existing flow pathways. A plan should be submitted showing both existing and proposed exceedance flow routes, demonstrating that flood risk will not be increased to neighbouring properties or other vulnerable receptors.

6. A management and maintenance plan for the proposed surface water drainage system should be provided. This should clearly identify maintenance responsibilities, inspection frequencies, and the measures necessary to ensure the system remains effective throughout the lifetime of the development.

7. Please see the link below to our SuDS Guidance and Technical Assessment requirements, which should be followed when preparing the drainage submission. I have also attached a copy of Haringey's drainage pro forma, which must be completed and submitted as part of any future application.

Microsoft Word - Haringey SuDS Guide - Requirements for LLFA TA Issued Living Draft 11.03.2016 FINAL.docx

6. LBH Transportation

Received: 01 September 2026

Comment:

The applicant has provided in Appendix 2: Consideration of Schedule 3 EIA Screening Criteria, a review of the potential for significant environmental effects some analysis on traffic and transport. The following points need to be addressed:

1. The applicant needs to be more specific as to the envisaged construction vehicle trip generation by each phase of the works and to ensure movements avoid high peak hours (08:00-09:00, 17:00-18:00) and school pick-up/drop-off times (08:00-09:00 and 15:00-16:00).
2. A Construction Logistics Plan progressing to a full Construction Environmental Management Plan needs to be proposed. The CEMP will be secured via a pre-commencement condition.
3. The forecast 30-40 extra vehicular trips per day needs to be much more specifically explained in relation to how this is assumed in terms of the different site uses and whether or not this includes servicing and delivery activity.
4. The applicant has noted that the site will be car-free but has not mentioned anything about disabled parking provision.
5. The applicant needs to mention the transport/traffic impact of the PBSA use at move-in and move-out times e.g. at the end and start of the academic year etc.
6. The site is opposite a school, which is a sensitive location, consideration needs to be given as to how the traffic and transport impact will be mitigated in respect of the school site during construction and full operation.

Transport Recommendations:

The above-mentioned issues need to be addressed before the transport and traffic considerations can be accepted in the EIA.

7. Natural England

Received: 27 August 2026

Comment:

Thank you for the above consultation received by Natural England on 19th August 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

It is Natural England's advice, on the basis of the material supplied with the consultation, that the proposed development has potential likely significant effects on statutorily designated nature conservation sites or landscapes and further consideration is required.

Schedule 3(2) of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 requires consideration of the selection criteria for Schedule 2 EIA development and identification of 'environmental sensitivity'.

The proposed development is located within or has the potential for adverse effects on the following designated sites:
- Walthamstow Reservoirs Site of Special Scientific Interest (SSSI)
- Epping Forest Special Area of Conservation (SAC)
- Lee Valley Ramsar
- Lee Valley Special Protection Area (SPA)

Summary
Natural England has not assessed the significance of any impacts on these designated sites or landscapes. The proposed development may therefore be likely to have significant effects on the interest features for which these sites are notified or the purposes of designation and we advise you to consider further whether an Environmental Impact Assessment (EIA) is required.

Should you decide that an EIA is not required, Natural England advises that sufficient information on the potential impacts of this proposal upon these designated sites/areas is submitted with any subsequent planning application. We would be pleased to discuss this further with the applicant through our Discretionary Advice Service.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this proposal is likely to affect protected species to such an extent as to require an Environmental Impact Assessment (EIA). The developer must provide sufficient information for your authority to assess whether protected species are likely to be affected and, if so, whether appropriate avoidance, mitigation or compensation measures can be put in place. Further information is included in Natural England's standing advice on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. This development proposal may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land or on local landscape character that may be sufficient to warrant an EIA. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the proposed development before determining whether an EIA is necessary.

Should you determine that an EIA is not required in this case, you should ensure that the application is supported by sufficient biodiversity, landscape and other environmental information in order for you to assess the weight to give these material considerations when determining the planning application.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that this response relates only to the EIA screening consultation. Natural England may wish to provide advice should your authority consult us on any subsequent planning application and associated environmental assessments.

8. TfL

Received: 14 September 2026
Comment:
Thank you for consulting TfL Spatial Planning. TfL has attended formal GLA pre-application discussions with the applicant.

I note from Appendix 2 re traffic and transport that various matters will be addressed within the Transport Assessment (TA) which will be submitted to support the future planning application.

The Transport Assessment should be in line with TfL best practice and include assessment of cumulative impacts from nearby and neighbouring development sites in the Active Travel Zone (ATZ) assessment, and an outline TfL Construction Logistics Plan (CLP) as a chapter in the Healthy Streets TA.

TfL is satisfied for Haringey Council to determine this screening application, please feel free to contact me if you have any queries.

9. Thames Water

Received: 20 August 2026

Comment:

Waste Comments:

Waste Comments: Thank you for giving Thames Water the opportunity to comment on the above application. Thames Water are the statutory sewerage undertaker for the area and would like to make the following comments: The EIA Regulations 2017 set out in Schedule 4 that water and wastewater issues may need to be covered in an EIA. Thames Water consider the following issues should be considered and covered in either the EIA or planning application submission: 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met 2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met. 3. Build – out/ phasing details to ensure infrastructure can be delivered ahead of occupation. 4. Any piling methodology and will it adversely affect neighbouring utility services. Should the developer wish to obtain information on the above issues they should contact our Developer Services department on 0800 0093921

Water Comments:

Water Comments: Thank you for giving Thames Water the opportunity to comment on the above application. Thames Water are the statutory water undertaker for the area and would like to make the following comments: Thames Water are satisfied that the report has considered the Water needs of the development as set out in The EIA Regulations 2017 Schedule 4.

Appendix 2 – Third Party Independent EIA Screening Opinion Request Review by Ramboll