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1st October 2026

Dear Philip

Former Cannon Factory site, between Watermead Way, Ashley Road and Burdock Road, Tottenham, London, N17 9LJ – Independent EIA Screening Opinion Request Review

Case Reference: HGY/2026/2329

Local Planning authority: London Borough of Haringey (LB Haringey)

Applicant: TH2026 LLP

Introduction

This letter sets out an independent review by Ramboll of the EIA Screening Opinion request for a forthcoming planning application of the former Cannon Factory site. The purpose of the review is to provide environmental specialist expertise to help inform the EIA Screening Opinion.

Ramboll have undertaken the following:

- Review of the EIA screening opinion request by the Applicant (Trium, dated 14 August 2026);
- Review of the project characteristics against the EIA Regulations 2017.

The guidance set out in the Town and County Planning (Environmental Impact Assessment) Regulations 2017 Screening Matrix has been used to inform Ramboll's independent review.[1]

Description of the Project Development

The proposed development is for a residential and hotel-led development. It would comprise two buildings ranging from approximately 8 to 25 storeys, with a maximum height of approximately 85.5 metres above Ordnance Datum.

One building would provide approximately 450 purpose-built student accommodation rooms with associated amenity, ancillary and commercial floorspace. The second building would provide a hotel of up to approximately 170 rooms.

The proposals would also include public realm, landscaping, pedestrian and cycle access, cycle parking, servicing, deliveries, drainage, utilities and other associated works.

[1] Town and County Planning (Environmental Impact Assessment) Regulations 2017 Screening Matrix: TCPA_EIA_Screening_Matrix_2017_Regs_Nov_2021.pdf

No basement is proposed, although the buildings may incorporate an approximately 1.5-metre sunken slab. The proposed development is intended to be car-free, apart from any necessary Blue Badge parking provision. Servicing and deliveries would be accessed from Burdock Road.

The site is approximately 0.3 hectares and has been cleared following the implementation of earlier planning permissions. It is currently enclosed by construction hoarding and contains crushed material and limited areas of scrub.

EIA Regulations – Schedule 2 EIA Category Review and Location of the Site
The proposed development does not fall within any of the descriptions in Schedule 1 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended.

The site area is approximately 0.3 hectares and therefore does not exceed the 1-hectare threshold for urban development that is not dwellinghouse development or the overall 5-hectare threshold.

The proposed development would provide approximately 450 purpose-built student accommodation bedspaces. Purpose-built student accommodation is a sui generis use, and the bedspaces would not necessarily constitute conventional self-contained dwellinghouses. However, the Applicant notes that the London Plan applies a ratio of 2.5 student bedrooms to one conventional home for monitoring housing delivery. On this basis, approximately 450 student rooms would equate to approximately 180 homes.

Given the scale and nature of the accommodation and the potential interpretation of the 150-dwelling threshold, the Council has screened the proposed development as Schedule 2 development on a precautionary basis.

The site is also located within the Lea Valley Tier 3 Archaeological Priority Area. An Archaeological Priority Area does not constitute a sensitive area as defined by Regulation 2.

The site itself is not within a sensitive area as defined by Regulation 2 of the EIA Regulations.

Use of Natural Resources
The proposed development would introduce two substantial buildings of between approximately 8 and 25 storeys onto a currently cleared site. Construction would require foundations, piling, excavation, installation of a sunken slab, drainage and utility works, hard and soft landscaping, public realm and associated infrastructure.

The proposed development would therefore result in a permanent physical change to the site, although it would not materially alter the wider topography outside the site.

The physical changes to the site would be permanent but would occur on previously developed land within an established regeneration area. The physical alteration of the land is not, in itself, likely to result in a significant environmental effect.

The height and massing of the proposed development could result in townscape, visual, heritage, daylight, sunlight, overshadowing and wind effects.

Construction would require land, water, energy and construction materials. The development would also generate embodied carbon through the manufacture and transport of construction materials and the construction process.

Once operational, the student accommodation, hotel and commercial uses would consume water and energy and would generate wastewater and waste.

The proposal would not result in the loss of agricultural land, forestry or identified mineral resources.

The site does not contain agricultural land or known mineral resources. The site is within the Lea Valley Tier 3 Archaeological Priority Area, where Enfield Silt and brickearth deposits may preserve prehistoric and later archaeological or palaeoenvironmental evidence.

Groundwater and nearby designated ecological sites may also represent sensitive environmental resources, depending on the presence of impact pathways.

An Energy Statement, Whole Life-Cycle Carbon Assessment where required by policy, Circular Economy Statement, drainage information and other relevant application documents should demonstrate how resource use would be minimised. Subject to appropriate design, procurement and management measures, the use of natural resources is not expected to give rise to likely significant environmental effects.

Waste
Construction would produce excavation, construction and packaging waste. The site has already been substantially cleared, although existing crushed materials and any remaining structures or hardstanding may require removal, treatment or reuse.

Operational waste quantities will arise from the student accommodation, hotel, commercial uses and associated public areas but is not expected to generate waste at a scale likely to affect regional waste-management or landfill capacity significantly.

A Construction Environmental Management Plan or Construction Management Plan should identify the likely waste streams, application of the waste hierarchy, opportunities for reuse of existing crushed material, recycling targets and intended management routes. Operational waste storage and collection arrangements should be addressed through the detailed design and a Delivery and Servicing Management Plan.

Subject to these mitigation measures being in place, likely significant waste effects can be avoided.

Pollution and Nuisances
The whole of the London Borough of Haringey is designated as an Air Quality Management Area for nitrogen dioxide and particulate matter. The site is also close to an identified air-quality focus area.

Construction could generate dust and emissions from construction plant and vehicles. Operational emissions could arise from servicing, deliveries, taxis and any emergency generators. The main energy strategy is expected to be electricity-led, using air-source heat pumps rather than combustion plant.

The proposed development is intended to be car-free and the operational increase in road traffic is expected to be limited. Construction effects would be temporary and capable of mitigation through established dust-control measures, construction logistics and compliance with the applicable Non-Road Mobile Machinery standards.

An Air Quality Assessment should accompany the planning application and confirm the construction dust risk, construction and operational traffic assumptions, effects on existing and future receptors, the proposed energy strategy and any emissions from emergency generators.

Subject to these matters and appropriate mitigation being secured, significant air-quality effects are unlikely.

Noise and Vibration
Construction activities would generate noise and potentially vibration from piling, groundworks, construction plant and vehicle movements.

Sensitive receptors include nearby residential properties, and the Harris Academy opposite the site, commercial occupiers, users of surrounding streets and occupants of existing and emerging developments. London Underground, railway and utility infrastructure may also be sensitive to vibration and ground movement.

Operational noise could arise from building-services plant, hotel and commercial activities, servicing, deliveries and increased activity. The proposed development could also introduce additional artificial lighting and reflective façades.

Construction and operational noise effects are likely to be localised and may be controlled through construction management, appropriate working hours, plant design, acoustic specifications and servicing controls. However, an acoustic report is required to demonstrate the likely magnitude of effects and the suitability of the site for student and hotel accommodation.

Daylight, Sunlight and Overshadowing
The lighting strategy should demonstrate that spill and glare would be controlled in accordance with relevant guidance. A proportionate solar-glare assessment should consider railway drivers, railway signals, road users and nearby sensitive receptors.

The potential effects on London Underground, railway and utility infrastructure should be addressed through appropriate asset-protection consultation and technical assessments.

Contamination of Land or Water
The historical industrial use of the site, made ground, potential buried obstructions, groundwater conditions and existing crushed materials may present contamination risks.

Construction would involve excavation, piling and below-ground works that could disturb contaminated soils or create pathways to groundwater. An elevated unexploded ordnance risk has also been identified at desk-study stage.

These risks are typical of previously developed urban land and should be capable of management through a Phase 1 Geoenvironmental Desk Study, a preliminary conceptual site model, intrusive ground investigation, remediation where necessary, verification and appropriate construction controls.

The planning application should establish that the proposed foundation, excavation and drainage works would not mobilise contamination or adversely affect groundwater, neighbouring buildings, London Underground assets, railway infrastructure or Thames Water infrastructure.

Subject to the ground investigation and subsequent mitigation measures, likely significant effects related to ground conditions are likely to be avoided.

Existing Pollution and Environmental Damage
The site lies within the Haringey Air Quality Management Area and near an air-quality focus area. It is also within a dense urban environment affected by road traffic, railway activity, construction and other existing noise sources.

The Air Quality Assessment and Acoustic Report should demonstrate that the proposed development would not materially worsen existing conditions and that acceptable conditions could be provided for future occupants.

Subject to appropriate design and mitigation, existing pollution conditions are not expected to result in any permanent, long term significant adverse environmental effects.

Population and Human Health
Relevant health and safety risks to humans include fire, flooding, construction accidents, unexploded ordnance, structural and ground movement risks and risks associated with construction close to railway, London Underground and utility infrastructure.

The proposed development would not introduce industrial processes or hazardous substances at quantities likely to create a major-accident risk.

Fire safety, structural safety, unexploded ordnance, construction safety and asset-protection matters would be controlled through detailed design, the Building Regulations, relevant health and safety legislation and consultation with infrastructure operators.

Construction could affect nearby residents, students, school users, workers, pedestrians and cyclists through noise, dust, vibration, traffic, temporary access changes and construction activity.

Once operational, the proposed development would introduce approximately 450 student rooms, a hotel of up to approximately 170 rooms and commercial floorspace. This would increase the number of people using the site and surrounding area and could affect demand for health, transport and other local services.

The effects are likely to be local and capable of mitigation. However, the Health Impact Assessment should address the combined health pathways associated with air quality, noise, transport, access, safety, housing conditions, open space and local services.

The assessment should also consider vulnerable groups, including children and young people attending Harris Academy, existing residents and people with disabilities.

Water Resources
Construction could affect surface-water drainage and groundwater through excavation, piling, dewatering, accidental spillages and disturbance of contaminated ground.

The completed development would introduce buildings, hardstanding, drainage infrastructure and increased foul-water demand.

A Flood Risk Assessment and Drainage Strategy should demonstrate the applicable sources of flood risk, the proposed sustainable drainage measures, surface-water discharge arrangements, climate-change allowances and the management of exceedance events.

The assessment should also address groundwater conditions, the potential effects of the sunken slab and foundations and the capacity of the foul-water network.

Subject to confirmation of drainage and sewer capacity and appropriate construction pollution controls, significant water-resource or flood-risk effects are unlikely.

Biodiversity
The site itself is largely cleared and is expected to have limited habitat value. The site contains limited scrub and may provide habitat for nesting birds or other urban wildlife. The surrounding area may provide habitat connections, including to the Lee Valley.

A Preliminary Ecological Appraisal and any necessary protected-species surveys should identify the habitats and species present and define avoidance, mitigation, compensation and biodiversity-enhancement measures.

Significant effects are not expected given the limited habitat currently present on the site, but this conclusion must be confirmed through appropriate ecological survey and assessment.

Based on its consultation response, Natural England has identified the potential for effects on:

- Walthamstow Reservoirs Site of Special Scientific Interest;
- Lee Valley Special Protection Area;
- Lee Valley Ramsar site; and
- Epping Forest Special Area of Conservation.

The information presently available does not yet adequately establish whether pathways exist through recreational pressure, water demand, wastewater, air quality, lighting, hydrology or other mechanisms. The Applicant should provide sufficient ecological information to identify the relevant impact pathways and demonstrate whether likely significant effects can be excluded.

If likely significant effects on a European site cannot be excluded at the screening stage of the Habitats Regulations Assessment, the competent authority would need to undertake an appropriate assessment.

With appropriate mitigation measures, it is likely that likely significant ecological and biodiversity effects can be avoided.

Landscape, Townscape and Visual Effects
The site is within the Tottenham Growth Area and a wider regeneration context characterised by existing and emerging tall buildings. It is not within a nationally designated landscape or a London View Management Framework viewing corridor.

The proposed development would reach approximately 25 storeys and 85.5 metres above Ordnance Datum and could affect local townscape character, conservation areas, heritage assets and identified or valued views.

The regeneration context and presence of other tall buildings do not, by themselves, demonstrate that significant townscape effects are unlikely.

A Heritage, Townscape and Visual Impact Assessment should be undertaken. It should assess the proposed development against the existing baseline and relevant cumulative scenarios and explain the sensitivity of affected townscape character areas.

The conclusions should be supported by accurate visual representations proportionate to the scale and height of the proposed development.

The proposed development would be visible from local streets, surrounding residential development, the railway corridor, open spaces and potentially more distant locations.

Historic England advises that, given the height of the buildings, the proposed development may be visible over a large area and could affect the significance of heritage assets at some distance from the site.

The Applicant refers to a Zone of Theoretical Visibility prepared using VU.CITY and a visual study area extending up to approximately 2 kilometres. In line with Historic England's consultation response, the built heritage, townscape and visual assessment should 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.

The Applicant should provide the Zone of Theoretical Visibility as part of the assessment to justify the extent of the study area. Viewpoints should be agreed with the Council's conservation and design officers and should consider relevant conservation-area appraisals, management guidance and protected or important views.

Cultural Heritage and Archaeology

The site does not contain a designated heritage asset and is not within a conservation area. The nearest identified listed building is the Grade II listed property at 62 Monument Way, approximately 530 metres from the site.

Other designated and non-designated assets are present in the wider area, including conservation areas, buildings along High Road and Bruce Grove, the Grade II listed Drapers' Almshouses and the locally listed former Eagle Pencil Factory at Berol House.

The site is also within the Lea Valley Tier 3 Archaeological Priority Area.

For built heritage, Historic England considers that the proposed height could result in effects on heritage assets over a wider area than that currently considered. The Heritage, Townscape and Visual Impact Assessment must demonstrate that the study area is sufficient to identify all assets whose significance could be affected.

A Zone of Theoretical Visibility should be used to inform the heritage study area and viewpoint selection. The assessment should consider views towards, from and within relevant conservation areas and the settings of listed and locally listed buildings.

For archaeology, the Applicant's assumption that twentieth-century development has severely disturbed archaeological deposits has not been adequately demonstrated. Greater London Archaeological Advisory

Service (GLAAS) advises that the site appears to have remained largely undeveloped during much of the modern period and that Enfield Silt or brickearth deposits may preserve prehistoric or later evidence. Archaeological evidence has previously been identified at Ferry Island and North Island to the south. An Archaeological Desk-Based Assessment should be undertaken. It should:

- Include a search of the Greater London Historic Environment Record;
- Consider the former route or field boundary identified between Hale Farm and the River Lea;
- Assess the survival, depth and archaeological potential of Enfield Silt or brickearth;
- Review the results of relevant geotechnical investigations;
- Assess the effects of piling, foundations, the sunken slab, services and other ground disturbance; and
- Identify whether field evaluation or other mitigation is required.

Transport and Access

The site is within an area of high public-transport accessibility, with a Public Transport Accessibility Level (PTAL) of 5. Tottenham Hale rail, underground and bus stations are approximately 250 metres from the site.

Surrounding routes are used by pedestrians, cyclists, residents, workers and pupils attending Harris Academy. The development would alter pedestrian and cycle movements and would provide new public realm and connections

The proposed public-realm and active-travel improvements may provide beneficial effects. However, the effects of construction, servicing, deliveries and the increased number of site users on pedestrian and cyclist amenity and safety have not been quantified adequately.

The Transport Assessment should consider severance, pedestrian and cyclist delay, amenity, fear and intimidation, road safety and accessibility, including access for disabled people.

Construction vehicles would use Burdock Road and Watermead Way. Operational trips would include taxis, servicing, deliveries, waste collection, hotel activity, student movements and travel associated with the commercial floorspace.

The Applicant estimates an increase of approximately 30 to 40 vehicle trips, but the period over which this figure applies and the trip-generation assumptions for each use have not been clarified. LB Haringey Transportation requires the following information as part of the planning application to evaluate the transport effects:

- Forecast construction vehicle movements for each phase of construction;
- Proposed construction routes and holding arrangements;
- Measures to avoid the morning and evening highway peaks;
- Measures to avoid school arrival and departure periods;
- Clarification of the forecast 30 to 40 operational vehicle trips;
- Confirmation of whether the forecast includes servicing, deliveries and taxis;
- Assessment of student move-in and move-out periods;
- Details of Blue Badge parking and accessible pick-up and drop-off;
- Effects on Harris Academy and its pupils during construction and operation; and
- An Outline Construction Logistics Plan capable of informing a secured Construction Environmental Management Plan.

The assessment should also consider cumulative construction traffic where nearby developments may be constructed concurrently.

Land Use
The site is vacant and cleared. Surrounding uses include residential development, commercial premises, Harris Academy, roads, railway infrastructure, public transport facilities and public open space.

The surrounding Tottenham Hale area is undergoing substantial regeneration. Existing, approved, under-construction and emerging developments include Berol Quarter, the Strategic Development Partnership sites, 29–33 The Hale and emerging proposals at Ashley House.

The proposed development would reuse previously developed land within an identified growth and regeneration area. Direct loss of an existing active community use would not occur.

Construction could temporarily affect neighbouring occupiers and users through noise, dust, traffic and access changes. The completed development would introduce a substantial student population, hotel guests, workers and visitors.

Effects on surrounding uses should be managed to acceptable level of impacts through good design through good design and through good construction management during the construction programme.

Land Stability and Climate
The site is not known to be unusually susceptible to earthquakes, landslides or natural ground instability. However, made ground, previous industrial use, groundwater, piling, excavations, nearby infrastructure and a potential unexploded ordnance risk require consideration.

The height and form of the buildings may also influence local wind conditions. Climate change could increase the frequency and severity of extreme heat and intense rainfall.

Ground risks should be capable of control through investigation, foundation design, monitoring and asset-protection measures.

A wind microclimate assessment should consider pedestrian comfort and safety for the existing, proposed and cumulative scenarios. It should assess entrances, footways, crossings, cycle routes, public realm, amenity areas and other sensitive locations using an appropriate methodology such as the Lawson criteria.

The assessment must demonstrate that safe and suitable wind conditions can be achieved through the design, rather than relying on mitigation that has not been defined or secured.

An overheating assessment and drainage strategy should address future climate conditions. Subject to these assessments, significant climate-resilience effects are unlikely.

Cumulative Effects
The wider Tottenham Hale area contains a number of additional existing, approved, under-construction and emerging tall and high-density developments. The Applicant has identified the following developments in the vicinity of the proposed development that has the potential to cause likely significant effects:

- Berol Quarter, Ashley Road;

- the remaining Strategic Development Partnership sites;
- 29–33 The Hale; and
- emerging proposals at Ashley House.

Whilst not consented, the combined and cumulative effects for the proposed development and the emerging Ashley House proposals are important for London Borough of Haringey to consider due to the proximity of the two sites and the overlapping potential for combined townscape, visual, heritage, wind and construction effects.

Transboundary Effects
Effects on another European Economic Area state the nature, location and scale of the proposed development are such that it would not result in transboundary effects.

No likely significant transboundary effects are anticipated.

Conclusion
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 LB Haringey 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 LB Haringey and take into account measures to avoid likely significant effects related to cumulative schemes.

Yours sincerely

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