

Report for: Cabinet - 17 June 2025

Title: Broadwater Farm Resident Access

Report authorised by: Barry Francis, Corporate Director of Environment and Resident Experience

Lead Officer: Mark Stevens, Director of Resident Experience

Ward(s) affected: Bruce Castle, Tottenham Central, West Green

Report for Key / Non-Key Decision: Key Decision

1. Describe the issue under consideration

- 1.1 This report considers the principle of providing additional access and egress by motor vehicle for Broadwater Farm residents as well as the proposed consultation and decision-making processes.

2. Cabinet Member Introduction

- 2.1 The Bruce Grove West Green Low Traffic Neighbourhood (LTN) has delivered significant safety improvements since implementation, the December 2024 Cabinet report showed that road traffic collisions halved across the area. However, we recognise that the unique geography of Broadwater Farm (BWF) creates particular challenges for residents. Located centrally within our largest LTN, with some of the lowest public transport accessibility levels in the borough, BWF residents face longer diversionary routes than most when accessing services to the south via Philip Lane.
- 2.2 This targeted proposal addresses equity concerns whilst preserving the environmental and safety benefits that LTNs deliver for our communities. With only 41% of BWF households on average owning cars—below the borough average—this measured exemption will benefit those who need it most without undermining traffic reduction objectives. Our proposal simply ensures that this 'LTN within an LTN' doesn't inadvertently disadvantage residents who rely on private vehicles for essential journeys, whilst maintaining the integrity of the wider network that has made our streets safer for everyone.

3. Recommendations

It is recommended that Cabinet:

- 3.1 Approves, subject to statutory (traffic order) consultation:
- a) changes to the existing traffic filter in Gloucester Road as set out in Appendix A
 - b) introduction of a new Low Traffic Neighbourhood (LTN) exemption that would allow residents who live on Broadwater Farm to apply for one permit that would entitle them to drive a single motor vehicle to which they are the registered keeper through the traffic filter defined in 3.1(a).

- 3.2 Approves the commencement of statutory (traffic order) consultation associated with the recommendations in 3.1 in accordance with The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 (the "Regulations"), such consultation not to commence until after the conclusion of the call-in period following this decision.
- 3.3 Delegates authority to the Corporate Director of Environment and Resident Experience, following consultation with the Cabinet Member for Climate Action, Environment and Transport, subject to key decisions being considered by Cabinet, to:
- a) consider any objections arising from the statutory (traffic order) consultation and take a decision whether to make the associated traffic order(s)
 - b) approve the amendment to the LTN exemption criteria, taking into account any objections arising from the consultation.

4. Reasons for decision

- 4.1 The reasons for the recommendations in this report are set out in detail in Section 6 of this report.

5. Alternative options considered

Do nothing

- 5.1 This option would retain the current status quo whereby the majority¹ of motorists living on Broadwater Farm access their home via roads leading to and from Lordship Lane or Bruce Grove. The current location of traffic filters (mainly to the south of the Broadwater Farm) mean that most Broadwater Farm residents cannot directly access their home via roads leading to and from Philip Lane.

Remove the Gloucester Road traffic filter

- 5.2 This option would enable Broadwater Farm residents motor vehicle access to and from Philip Lane. However, it would also create a 'leaky' LTN whereby any motorist could drive through. This would undermine one of the key principles of the LTN and therefore this option has been discounted.

Alternative traffic filters

- 5.3 Two other existing traffic filters have the potential to increase access to Broadwater Farm residents. However, both have been discounted for the following reasons:
- Diagonal traffic filter at the junction of Higham Road and Dongola Road: the Council does not provide exemption permits for diagonal filters in the borough due to the increased risk of collision in such a layout.
 - Mount Pleasant Road, south of its junction with The Avenue: this filter currently provides exemptions in a southbound direction only. Due to the

¹ Exemption permits are already available for some motorist groups, as set out in paragraph 6.6

proximity of the zebra crossing and that Mount Pleasant Road was (pre-LTN) one-way, the location is not considered suitable for two-way exemptions.

6. Background information

Cabinet decision (December 2024)

- 6.1 In December 2024, Cabinet approved the making permanent of the Bruce Grove West Green (BGWG) LTN² after it had been operating on a trial (experimental) basis since November 2022 and was subject to an interim review in July 2023³, following which, in September 2023, a new experimental traffic order was made that included additional exemption provisions for Haringey Blue Badge holders and changes to some traffic filters.
- 6.2 As part of that decision, it was agreed that *“The council will undertake a review on access by motor vehicle for Broadwater Farm residents should the trial scheme become permanent.”*

Broadwater Farm, traffic filters and exemptions

- 6.3 For the purposes of this report, ‘Broadwater Farm’ includes all properties within Broadwater Farm estate and those properties on Moira Close which is a cul-de-sac that is only accessible via Adams Road which runs through the estate.
- 6.4 The map contained in Appendix B shows the boundary of Broadwater Farm and the surrounding traffic filters that create the BGGW LTN.
- 6.5 All properties within an LTN remain accessible by car, although routes may have changed following the LTN’s introduction. Access to properties within an LTN are via ‘internal’ roads which connect to ‘boundary roads’. Boundary roads tend to be main roads (for example ‘A’ or ‘B’ classified roads) where most motor vehicle traffic is expected to flow – these are mapped in Appendix C.
- 6.6 LTN exemptions enable motorists to pass through specified traffic filters and are currently available to the following motorist groups following a successful application process:
- Haringey Blue Badge holders
 - people with health conditions, access needs and disability needs – known as an ‘individual circumstance’ exemption
 - urgent safety matters
 - special educational needs and disabilities (SEND) transport
 - Haringey services transporting people with a disability and Transport for London’s Dial-a-Ride service

² Coming into effect in February 2025

³ <https://www.minutes.haringey.gov.uk/ielIssueDetails.aspx?IId=83749&PlanId=0&Opt=3#AI76029>

- emergency services
- Council refuse and cleansing services

6.7 Exemption permits may be granted to a specific traffic filter or a group of filters. Filters are grouped by the LTN area in which they are located, as shown in Figure 1. Where the exemption applies (eg 'Permit holders X3A') this is shown on the traffic sign associated with that filter.

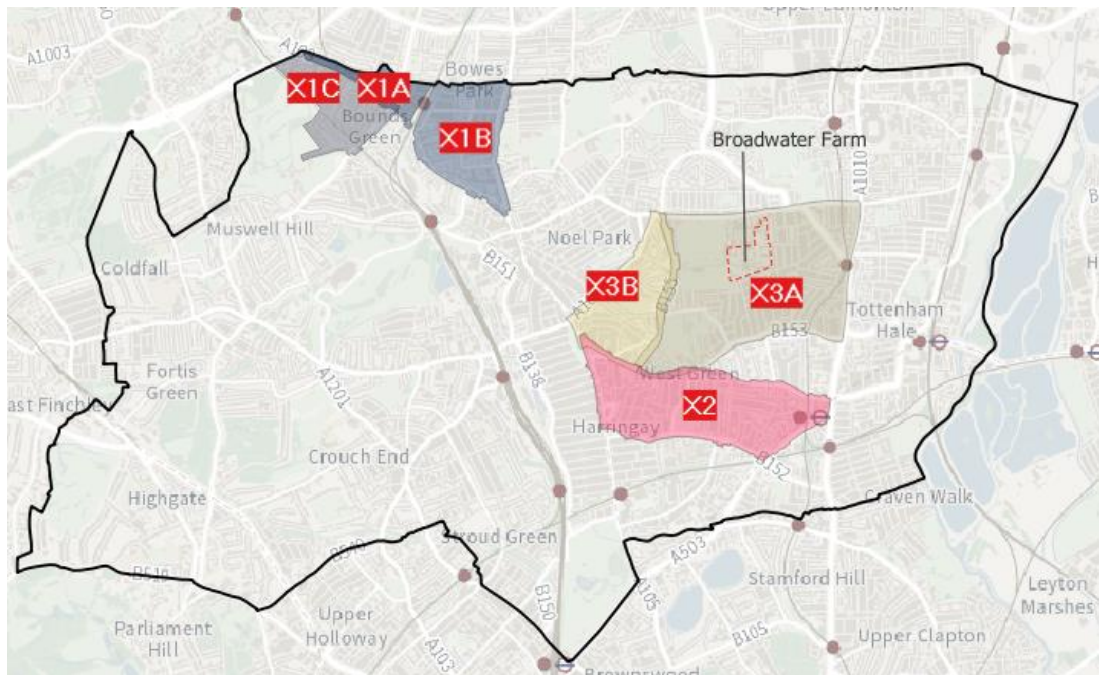


Figure 1 - Map showing the location of Broadwater Farm and the LTN filter groups
(X1 = Bounds Green, X2 = St. Ann's, X3 = Bruce Grove West Green)
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Objective of the proposal

- 6.8 In line with the decision taken by Cabinet at its meeting in December 2024, an initial assessment has been carried out to determine how motor vehicle access to Broadwater Farm could be improved.
- 6.9 The objective of the assessment was to:
- Identify traffic filter(s) that could be changed that would increase motor vehicle routes to Broadwater Farm;
 - Maintain the integrity of the overall LTN. i.e. ensure that non-local, through-traffic could not pass through the LTN; and
 - Consider what changes (if any) would be required to the LTN exemption criteria to enable delivery of objective (A)

Proposal

- 6.10 As set out in recommendation 3.1(a), it is proposed that the traffic signs for the existing traffic filter on Gloucester Road are changed to allow a new (and additional) category of exemption (X3A-BWF) through that filter. For the avoidance of doubt, any X3A permit holders will be permitted to continue driving through this filter.
- 6.11 As set out in recommendation 3.1(b), it is proposed that one X3A-BWF exemption is made available to any resident who is the registered keeper of a motor vehicle and lives in Broadwater Farm.
- 6.12 To enable these proposals to be implemented, the associated traffic orders would need to be amended and, in line with legislation, this would be subject to statutory (traffic order) consultation and consideration of any objections. Further detail on the consultation and future decision-making process is set out in paragraphs 6.18 to 6.21.

Rationale for the proposal

- 6.13 To date, the criteria for an LTN exemptions have, primarily, been on the basis of need rather than the basis of location. For example, exemptions are available to any resident with a Blue Badge (need) so long as they live in Haringey (location). The exemption proposed in this report recommends a location-based exemption for Broadwater Farm residents, complementing the existing need-based exemptions, due to the unique circumstances (set out below) of Broadwater Farm within the LTN.
- 6.14 Justification for this new exemption is based upon Broadwater Farm's unique situation and the collective effect of the following:

- a) **Public Transport Accessibility Level (PTAL).** PTAL is a measure which rates locations by distance from frequent public transport services. As shown in Figure 2, Broadwater Farm has some of the lowest PTAL scores within an LTN. Therefore, residents within this area are more likely to be reliant upon walking, cycling and/or cars.

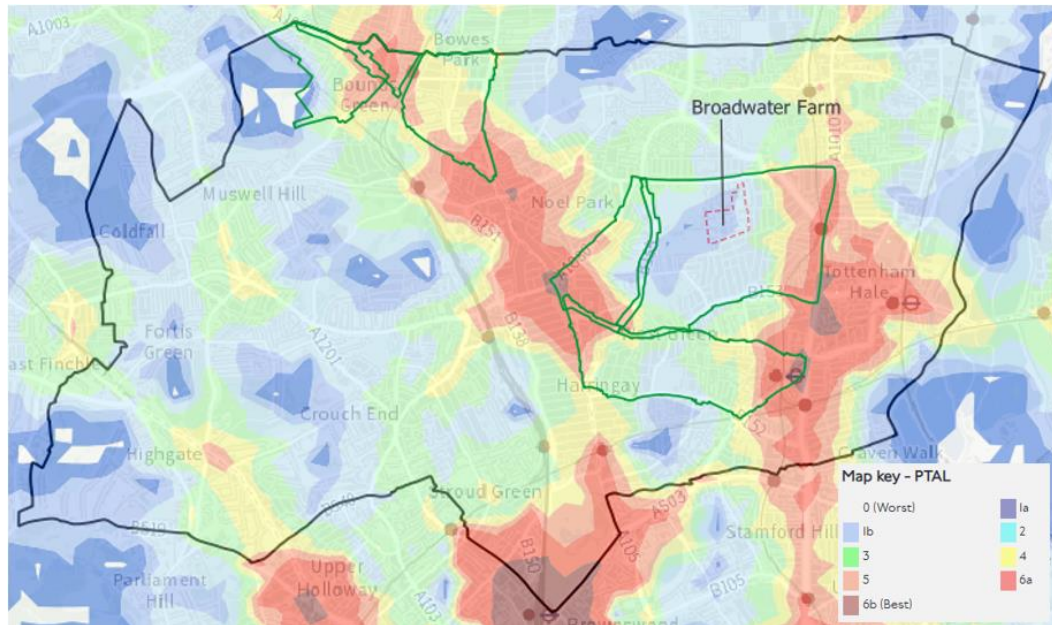


Figure 2 - Public Transport Accessibility Levels (PTAL)

- b) **Location.** Those living in properties towards the southern perimeter of Broadwater Farm (e.g. Debden, Croydon, Tangmere, Willow Road House) are located centrally within BGWG, which is Haringey's largest LTN. Due to the position of the traffic filters immediately to the south, these residents are at a greater distance from a boundary road than most (see Appendix B). For those wanting to drive to services, jobs, family or friends to the south Broadwater Farm, there is no direct access to Philip Lane and therefore must currently drive (see Figure 3) either via A10 High Road or Lordship Lane, Downhills Way, Belmont Road. Therefore, the LTN has a higher impact upon these residents (by motor vehicle) than most others.

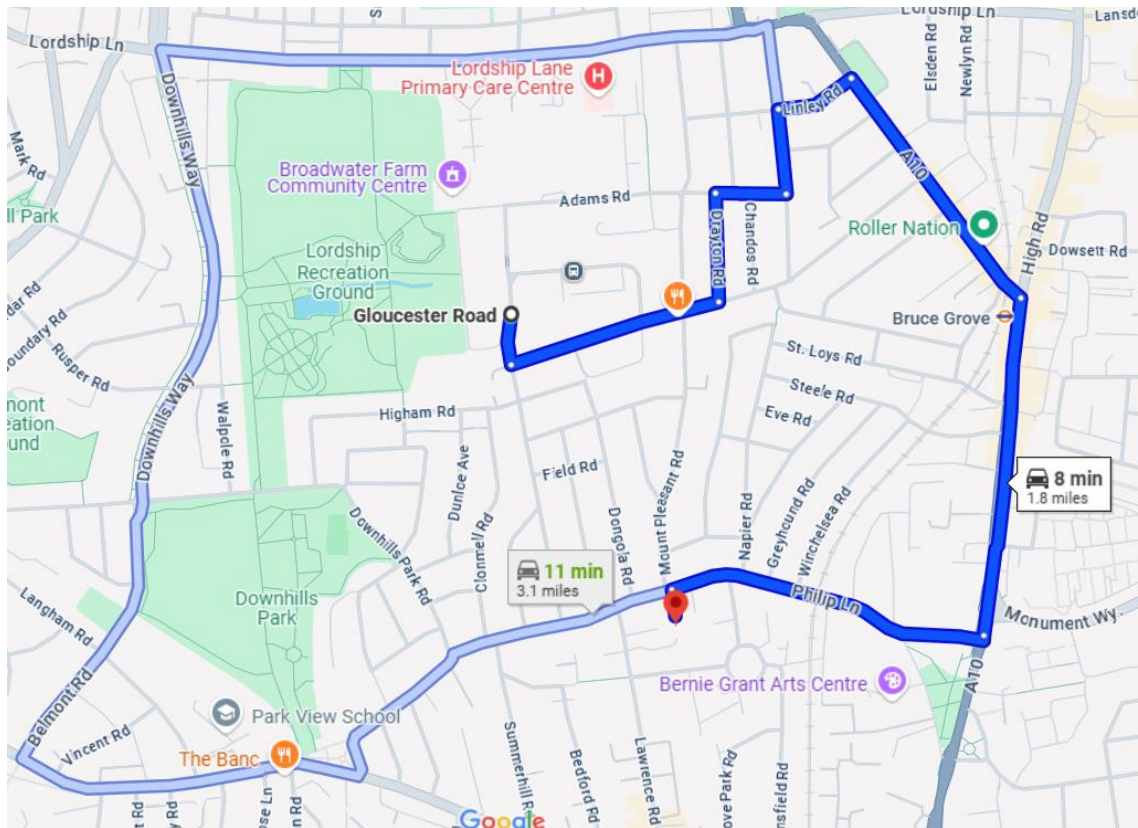


Figure 3 – Google Maps navigation routes from BWF (Gloucester Road) to Lawrence House Surgery

- c) **Population density.** Census 2021 data (see Figure 4) shows that BWF has a very high population density with one output area over 42,000 per square kilometre (which is equal approximately 1,000 properties), compared to the authority average of 8,930. This data should be considered alongside the justification in paragraph 6.14 (b), i.e. the LTN has a greater impact upon this area than most (due to its central position within the LTN) and more people live in this area than most.

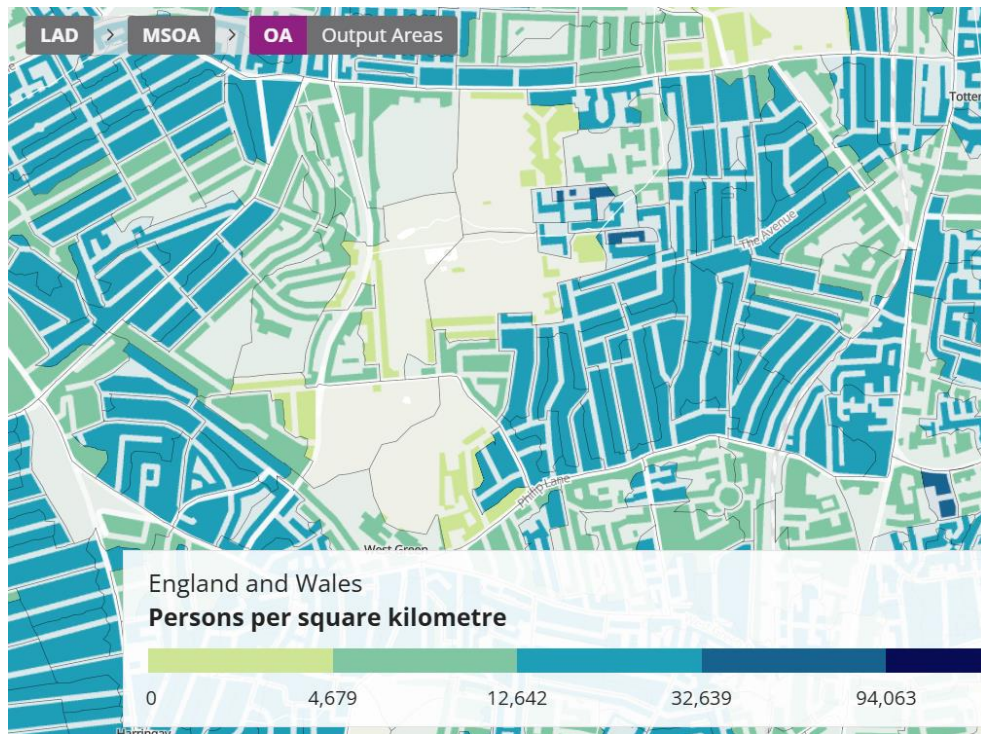


Figure 4 - Census 2021 population density

- d) **Car ownership.** Census 2021 data (see Figure 5) shows car ownership varies across the output areas that comprise Broadwater Farm with values ranging from 25 to 60% (average 41%) of households with 1 or more car or van - this compares to the authority average of 47.3%. This would indicate that, if implemented, there would be a lower percentage take-up of exemptions and, potentially (depending on origin and destination of trips), less impact upon surrounding roads when compared to other areas. The potential impact is discussed further in paragraph 6.15. Data taken from the Broadwater Farm Estate Parking Design and Management Plan, March 2022, identifies that there are approximately 1,000 parking spaces across the estate, of which about 600 are in use.



Figure 5 - Census 2021 car ownership

- e) **Local demand.** Whilst not unique to Broadwater Farm, a petition⁴ was received in April 2024 requesting that all residents within BGWG LTN should be eligible for an exemption to allow them to drive through filters in Area A (X3A) and Area B (X3B) filters. This petition was considered by Cabinet as part of the final decision making of the trial LTN but this request was not considered acceptable as, in its totality, it would undermine the integrity of the LTN. The recommendations contained in this report do address some of the petitioners' requests (i.e. those who live on Broadwater Farm) whilst ensuring that the integrity of the LTN remains largely intact by not allowing access for all motor vehicles.

Traffic impact of the proposal

- 6.15 An assessment of the potential traffic impact of the proposals has been carried out and the key findings / assumptions are:
- Of the 600 parking spaces occupied within the Broadwater Farm estate plus the parking spaces within Moira Close, it is estimated that a maximum of 400 vehicles per day may drive to/from Philip Lane via the proposed amended traffic filter on Gloucester Road.
 - The routes that drivers will use will depend upon time of day and direction of travel. The existing network of one-way streets will also influence the routes selected.

⁴ <https://www.minutes.haringey.gov.uk/mgEPetitionDisplay.aspx?ID=138&RPID=30968912&HPID=30968912>

- c. Southbound routes towards Philip Lane (which is expected to be higher in the AM period) may include some or all parts of the following streets:
- Dongola Road
 - Field Road
 - Chester Road
 - Higham Road
 - Gloucester Road
 - Clonmell Road
 - Downhills Avenue
 - Lismore Road
 - Alton Road
 - Downhills Park Road
- d. Northbound routes towards Broadwater Farm (which is expected to be higher in the PM period) may include some or all parts of the following:
- Mount Pleasant Road
 - Kitchener Road
 - Dongola Road
 - Kitchener Road
 - Higham Road
 - Clonmell Road
 - Alton Road
 - Lismore Road
 - Dunlow Avenue
 - Downhills Avenue
 - Downhills Park Road
- e. As there are wide variety of routes available to drivers, the impact of additional traffic is likely to be distributed across several roads.

6.16 As part of the Broadwater Farm regeneration programme and associated 'Construction Management Plan', it has been agreed (through the adopted LTN exemption approval/rejection process) that some construction vehicles will be permitted to be driven through the traffic filter on Gloucester Road. The number of these vehicles are limited and therefore the combined impact is considered, on balance, to be acceptable.

6.17 In addition, it is recognised that the W4 bus route serves this area and part of its route includes Higham Road as well as passing through the traffic filter on

Gloucester Road (which includes an existing local bus exemption). The recommendations contained within this report are not expected to adversely impact bus journey times.

Consultation and decision making

- 6.18 Prior to making a traffic order, the Regulations require the authority to carry out a 21-day consultation with specified persons (Section 6) as well as publish the proposal in a newspaper, the London Gazette where relevant and take other steps it may consider appropriate (Section 7).
- 6.19 For this proposal, the other steps considered appropriate are:
- a. Display of notices in roads affected by the order
 - b. Letter drop to all properties on Broadwater Farm as well as those properties on streets that are likely to be affected by the order (see map in Appendix D)
 - c. Email to key stakeholders, including ward members
 - d. Raise awareness of the consultation through focused and local networks
- 6.20 The authority will comply with all other procedures set out in the Regulations, such as the making available for public inspection the deposited documents. The proposal will be available for comment via the council's traffic order system on <https://streets.appyway.com/haringey>.
- 6.21 Before making the order, the authority must consider all objections that have been made in writing, state the grounds on which it is made and sent to the address specified in the notice of proposal. Recommendation 3.3 of this report sets out that consideration of any objections are delegated to an officer.

Duties under s122 RTRA and s16 NMA

- 6.22 The Council has a duty under section 122 of the Road Traffic Regulation Act (RTRA) 1984 to (so far as practicable having regard to certain specified matters) "secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway." Officers consider that the following matters are of particular relevance:
- a) The proposals secure and maintain reasonable access to premises
 - b) The proposals do not change the passage of heavy commercial vehicles and so, in turn, preserve the character and amenities of the area affected
 - c) The proposals recommend changes to one traffic filter within a wider Low Traffic Neighbourhood and the proposals are likely to have very limited change in air quality. Therefore, the proposal has due regard to the national air quality strategy, prepared under section 80 of the Environment Act 1995.

d) The proposals do not restrict the passage of public service vehicles.

- 6.23 The decision-making process also engages the network management duty in the Traffic Management Act 2004 s16. Officers, in their capacity as the network management authority, have had in mind the s16(1) duty to manage the applicable road network with a view to achieving the objectives in s16(1)(a)-(b). But, like the s122(1) duty, this is not absolute. The duty to achieve, as described, is “so far as may be reasonably practicable having regard to their other obligations, policies and objectives”. Officers consider that their recommendations are consistent with and do discharge the s16(1) duty and that the appropriate course of action is to adopt their recommendations.

Human Rights

- 6.24 While the proposal may potentially impact certain residents' human rights - such as Article 1 of the First Protocol (the right to peaceful enjoyment of possessions), Article 8 (the right to respect for private and family life, home, and correspondence), and Article 14 (prohibition of discrimination), the proposal accords with the law as the Council is permitted, under the RTRA, to restrict or regulate traffic.
- 6.25 The Council also pursues the legitimate aim of securing the expeditious, convenient and safe movement of vehicular and pedestrian traffic and provides exemptions for persons who require greater assistance such as children who use SEND transport (which would be eligible for a SEND exemption) or those with a long term chronic health condition that makes sitting in a car very difficult (and would be eligible for an Individual Circumstances exemption) and is therefore considered proportionate.

7. Contribution to the Corporate Delivery Plan

- 7.1 Carrying out consultation that exceeds the statutory minimum aligns with the Corporate Delivery Plan (CDP 2024-26) that identifies the Council will increase “opportunities for residents to participate in decision-making”.
- 7.2 The CDP also identifies that “we believe residents deserve and flourish in safe, clean and green neighbourhoods”. By maintaining the integrity of the LTN (i.e. not allowing general through-traffic), the proposals contained within this report support the stated objective of the LTN to “reduce the volume of through motor traffic on residential streets within the study area”.

8. Carbon and Climate Change

- 8.1 By maintaining the integrity of the LTN (i.e., not allowing general through-traffic) this, broadly, aligns with the overall transport objective contained within the Climate Change Action Plan⁵ to “Reduce emissions related to road transportation by 50%

⁵ [final haringey climate change action plan - march 2021.pdf](#)

by 2025 by growing public and active travel options, low carbon travel options and infrastructure.”

9. Statutory Officers’ comments

Finance

- 9.1 The cost of implementing the recommendations in section 3 above is approximately £20k. This will be funded from the approved General Fund Capital Programme, Walking and Cycling Action Plan (WCAP) LTN delivery. Currently, there is a budget of £708,000 for this scheme so the recommendation can be afforded.

Strategic Procurement

- 9.2 Strategic Procurement has been consulted in the preparation of this report. Strategic Procurement notes the recommendations in section 3 of this report do not include a procurement decision.

Director of Legal & Governance

- 9.3 The Council's power to regulate or control vehicular and other traffic via a traffic order is contained within section 6 of the Road Traffic Regulation Act 1984 (RTRA) and as described in paragraph 6.18 to 6.21 of this report, before such an order is made the measures proposed to regulate or control traffic must be consulted on.
- 9.4 Section 122 of the RTRA requires the Council to have regard to factors pointing in favour of imposing a restriction on the movement of traffic and those pointing in favour of securing the convenient and safe movement of such traffic, balancing the various considerations and concluding that the restrictions represent an appropriate outcome and section 16 of the Traffic Management Act 2004 that the Council will manage its road network with a view to securing the expeditious movement of traffic on that network and facilitating the expeditious movement of traffic on road networks for which other local authorities are responsible for.
- 9.5 The factors which have pointed in favour of making the changes to the existing traffic filter on Gloucester Road and introducing an exemption for residents of Broadwater Farm are set out in paragraph 6.22 of this report and how the expeditious movement of traffic on the Council's road network will be achieved is set out in paragraph 6.23 of this report.
- 9.6 The impact of the decision on persons' human rights is considered to be proportional as set out in clause 6.23 and 6.24 above and therefore lawful.
- 9.7 The decision to approve the changes to the existing traffic filter on Gloucester Road and introduce an exemption for residents of Broadwater Farm identified in section 3 of this report is an executive decision that can be exercised by Cabinet in accordance with the Council's Constitution.

Equality

- 9.8 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
 - Advance equality of opportunity between people who share a relevant protected characteristic and people who do not
 - Foster good relations between people who share a relevant protected characteristic and people who do not.
- 9.9 The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/belief, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.
- 9.10 Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic
- 9.11 A history of Equality Impact Assessment associated with the LTN, of which this proposal is linked to, is set out below:
- [Decision to implement the LTN on a trial basis](#) (December 2021)
 - [Decision to amend the exemption criteria](#) (July 2023)
 - [Decision relating to the interim review of the LTN](#) (July 2023)
 - [Decision relating to the making permanent of the LTN](#) (December 2024)
- 9.12 This proposal is being considered with the legitimate aim of exempting one car per household from a community of residents based on their unique circumstances within the LTN. The recommendations are made after considering car ownership data, population density, local demand and the anticipated impact of the exemption on the area affected by the specific exemption.
- 9.13 At this stage, the available data does not suggest that the recommendations contained in this report will have an adverse effect on groups sharing protected characteristics. It is noted that any Haringey residents holding a Blue Badge by reason of disability already hold an exemption or can apply for one and can drive through the LTN filters where exemptions apply.
- 9.14 Should the recommendations in this report be approved, an EqlA will be developed as part of the next stage of decision making. Preparation of the EqlA will be considered alongside any objections to the statutory (traffic order) consultation.
- 10. Use of appendices**
- Appendix A – Scheme plan
 - Appendix B – Bruce Grove West Green LTN and traffic filters

- Appendix C – LTN traffic filters and internal / boundary roads
- Appendix D – Map showing letter drop area

11. Background papers

- 7/12/21 – [Cabinet approval to implement trial LTN](#)
- 25/7/22 – [Cabinet Member approval of LTN exemptions](#)
- 11/7/23 – [Cabinet approval to make permanent 6 School Streets in 3 LTNs](#)
- 11/7/23 – [Cabinet approval of LTN interim review](#)
- 11/7/23 – [Cabinet approval of Interim Review of LTN Exemptions Procedure](#)
- 10/12/24 – [Cabinet approval to make BGWG LTN permanent](#)