

**Report for:** Corporate Director of Environment and Resident Experience following consultation with Cabinet Member for Resident Services and Tackling Inequality – 27 February 2026

**Title:** Amendment to exemptions to Gloucester Road traffic filter

**Report authorised by:** Eubert Malcolm, Director of Environment

**Lead Officer:** Simi Shah, Group Manager Traffic & Parking Projects  
Tim Walker, Programme Manager

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

**Report for Key/  
Non-key decision:** Non-key decision

## **1. Describe the issue under consideration**

- 1.1. This report sets out the outcome of statutory consultation on a proposed amendment to the exemptions available for the Gloucester Road traffic filter within the Bruce Grove West Green Low Traffic Neighbourhood (the LTN). The proposal would allow eligible residents of Broadwater Farm to apply for one exemption, enabling one vehicle of which the resident is the registered keeper to pass through the filter. For the purposes of this report “Broadwater Farm” refers to properties on the Broadwater Farm estate and those properties that are accessible solely via roads that pass through the estate, such as Moira Close and Grant Close.
- 1.2. Following consultation, this report recommends implementing the change under an Experimental Traffic Order (ETO) to allow monitoring and further engagement before any permanent decision is taken to make the exemption permanently available.

## **2. Recommendations**

It is recommended that the Corporate Director of Environment and Resident Experience:

- 2.1. Considers all objections, other representations received in response to the proposed permanent traffic order, notice<sup>1</sup> of which was published on 16 July 2025, and officer’s responses to those objections as set out in Section 6 and Appendix A - Consultation Report.
- 2.2. Considers the Equality Impact Assessment contained in Appendix B.
- 2.3. Approves the update to the LTN Exemption Criteria contained in Appendix C.
- 2.4. Approves the making of an Experimental Traffic Order (ETO) to amend the LTN Exemptions in relation to the Gloucester Road traffic filter so that residents of Broadwater Farm are eligible for an exemption, which would be available on the

---

<sup>1</sup> <https://www.thegazette.co.uk/notice/4927749>

same terms as those proposed on 16 July 2025, notably one exemption per eligible resident who must also be the registered keeper of that vehicle.

- 2.5. Authorises the Head of Highways and Parking to make the ETO and install the associated traffic signs, to give effect to the recommendations in 2.4, as shown in Appendix D.
- 2.6. Delegates authority to the Head of Highways and Parking to consider any objections received during the six-month statutory objection period and, together with any monitoring data captured, decide whether to make the order permanent, modify it, or revoke it before the Experimental Traffic Order expires after 18 months subject to all key decision regarding the making of the ETO permanent being referred to the Council's executive to take.

### **3. Reasons for decision**

- 3.1. The recommendations are intended to provide a fair and proportionate means of enabling improved access for residents of Broadwater Farm, while carefully balancing the concerns raised during the statutory consultation and ensuring that the overall objectives and integrity of the LTN are broadly maintained.
- 3.2. The decision does not result in a contract being awarded or expenditure in excess of £500,000 being incurred nor any virements, so it is not a key decision for that reason.
- 3.3. The decision will also not result in significant impact on communities living or working in West Green, Tottenham Central and Bruce Castle wards, in particular, it will not result in substantial public interest/significant social, economic or environmental risk and so is not a key decision for this reason.

### **4. Alternative options considered**

#### Do nothing

- 4.1. This option would not proceed with the proposed traffic order, and the LTN would remain unchanged. All existing traffic restrictions introduced as part of the LTN, following extensive consultation, would stay in place. This option would address many of the objections raised during the statutory consultation. However, it would not address the unique circumstances of Broadwater Farm identified in the June 2025 Cabinet Report<sup>2</sup> prior to consultation.

#### Make the traffic order as a permanent order

- 4.2. This option would make the proposed Gloucester Road exemption permanent as per the proposed order. However, many objections focused on the principle of conferring benefits on some residents while non-eligible streets may experience additional traffic, raising equity and displacement concerns. Proceeding without robust monitoring risks undermining LTN objectives if impacts on traffic, access and road danger are not demonstrably assessed.

---

<sup>2</sup> <https://www.minutes.haringey.gov.uk/mgAi.aspx?ID=82503>

### Remove filter entirely

- 4.3. This option would remove the Gloucester Road traffic filter in full, restoring unrestricted motor vehicle access. While it would address the unique circumstances of Broadwater Farm relating to resident access, it was previously discounted because removing the filter would create a leaky LTN, allowing through-traffic to re-enter the area and undermining the aims of reduced road danger and traffic volumes, including through Broadwater Farm itself. It would also risk increased vehicle movements on local streets and could reverse the wider benefits already delivered by the LTN.

## **5. Background information**

- 5.1. The LTN was approved by Cabinet in December 2021<sup>6</sup> as part of Haringey's Streets for People programme, supporting the priorities set out in the borough's Walking and Cycling Action Plan<sup>6</sup>. It came into effect in November 2022 under an Experimental Traffic Order, introducing a network of traffic filters designed to reduce through-traffic, encourage walking, cycling and wheeling, and create quieter and safer streets for residents across the area.
- 5.2. An interim review of the LTN<sup>8</sup> and exemption procedures<sup>3</sup> was completed in July 2023, drawing on traffic data, monitoring and community feedback. Cabinet agreed to continue the trial with amendments to some traffic filters and the exemption criteria. These changes aimed to refine the scheme while maintaining its wider objectives.
- 5.3. Following a further objection period during 2023 and 2024, Cabinet approved<sup>4</sup> making the LTN permanent in December 2024. As part of that decision, Cabinet acknowledged the particular access challenges experienced by Broadwater Farm residents due to the estate's location at the centre of the LTN and agreed that options to improve access should be explored.
- 5.4. In June 2025, Cabinet approved<sup>5</sup> commencement of a statutory consultation on a proposed exemption that would allow eligible Broadwater Farm residents to drive one registered vehicle through the Gloucester Road traffic filter. This proposal responded to issues around Broadwater Farm resident access to the south, particularly towards Philip Lane.
- 5.5. A statutory consultation on the proposed traffic order was carried out from July to September 2025, in accordance with the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 (LATOR). Residents and stakeholders were invited to submit objections and representations on the proposal.

## **6. Consultation and consideration of objections**

- 6.1. In accordance with Regulation 13(a) of the LATOR, the authority has considered all objections duly made and not withdrawn during the statutory consultation. The notice of proposal invited objections and other representations; while the statutory

---

<sup>3</sup> <https://www.minutes.haringey.gov.uk/mgAi.aspx?ID=76029>

<sup>4</sup> <https://www.minutes.haringey.gov.uk/mgAi.aspx?ID=80905>

<sup>5</sup> <https://www.minutes.haringey.gov.uk/mgAi.aspx?ID=82503>

duty relates to objections, the authority has had regard to all representations received.

### Engagement and communications

- 6.2. Appendix A (Consultation Report) sets out full details of the consultation process, communications and all feedback received. A summary is provided below.
- 6.3. Statutory consultation on the proposed amendment to the exemptions relating to the Gloucester Road traffic filter was carried out between 16 July and 10 September 2025 in accordance with LATOR. The consultation followed established council processes, including notices being published in a local newspaper and the London Gazette, notice of proposals sent to statutory consultees, documents made available for public inspection and sought to ensure residents and stakeholders across the affected area had clear and accessible opportunities to participate.
- 6.4. To support awareness and engagement, a letter drop was delivered to approximately 3,800 properties around the proposed traffic filter. Public notices were installed on lamp columns across key locations to signpost residents to further information. A dedicated webpage was published, providing background documents and plans, alongside a link to the traffic order portal (AppyWay) where formal objections and representations could be submitted. A news item was also posted on the Broadwater Farm Commonplace platform, ensuring targeted visibility for local residents.
- 6.5. In addition to general communications, emails were issued to key stakeholders and community groups, including statutory bodies and groups representing those with protected characteristics.
- 6.6. Alternative formats and translations were made available on request to support inclusive participation.

### Participation and headline results

- 6.7. A total of 152 responses were received:
  - 88 responses (58%) objected
  - 57 responses (37%) supported the proposal
  - 7 responses (5%) expressed neutral views
- 6.8. A petition opposing the proposal, containing 81 signatures, was also received and is included in Appendix A2.
- 6.9. Emergency services raised no objections to the proposal.

### Objections

- 6.10. The principal themes raised by objectors were:
  - Concerns about increased traffic, pollution, and road danger and loss of LTN benefits (quiet and safer streets, reduced emissions), particularly in roads to the south of the Gloucester Road traffic filter
  - Perceived unfairness of exemptions for one group of residents only

- Criticism of consultation process and lack of transparency.

Other representations (supporting and neutral)

- 6.11. While the legal duty under Regulation 13(a) applies only to objections, the council has also had regard to supporting and neutral representations. Supporters highlighted that the current LTN arrangements had led to:
- A feeling that Broadwater Farm had been inadvertently isolated
  - Isolation from essential services (GPs, schools, shops).
  - Taxi cancellations and long detours
  - Concerns about mobility, especially for carers, disabled residents, and families.
- 6.12. Supporters suggested that the proposal would help improve access to Philip Lane and surrounding services.

Consideration of objections

- 6.13. The table below responds to each principal objection theme with the officers' recommended response to that theme.

<b>Objection theme</b>	<b>Response</b>
Concerns about increased traffic, pollution, and road danger and loss of LTN benefits (quiet and safe streets, reduced emissions), particularly in roads to the south of the Gloucester Road traffic filter	<p>The recommendations in this report recognise these objections and respond to them by proposing an Experimental Traffic Order rather than a permanent order. This provides a controlled, evidence-led means of assessing any changes in traffic volumes, routing patterns and road danger before any permanent decision is made.</p> <p>The proposed exemption remains tightly defined: one exemption per eligible resident who must also be the registered keeper of the vehicle, limited to residents of Broadwater Farm; the filter continues to prevent general through-traffic. This maintains the core protective function of the LTN while enabling a targeted response to the access issues identified.</p> <p>Under the ETO, the Council will implement a structured monitoring plan, including traffic counts, speed surveys, collision data and compliance analysis. If monitoring demonstrates material adverse impacts - such as increases in traffic that could undermine LTN benefits - the ETO enables timely modification of the arrangements, including tightening eligibility or applying other operational adjustments. This staged approach ensures that the wider benefits of the LTN - quieter streets, reduced emissions and lower road danger - are preserved, while providing an equitable and evidence-based solution for Broadwater Farm residents</p>
Perceived unfairness of exemptions for one group of residents only	Cabinet has previously recognised the unique circumstances of Broadwater Farm, including its location at the centre of the borough's largest LTN, limited direct access to the south via Philip Lane, below-average public transport accessibility, and below-average car ownership. These conditions mean that

	<p>residents experience longer diversionary routes than most LTN households for car journeys.</p> <p>The proposed exemption is therefore considered a proportionate and targeted response to address this specific, evidenced access challenge.</p> <p>Importantly, the exemption is limited to residents of Broadwater Farm and is defined as one exemption per eligible resident who must also be the registered keeper of the vehicle. This avoids creating a “leaky LTN” while responding to the equity issue identified in the June 2025 Cabinet decision.</p> <p>Other residents continue to benefit from LTN protections and, where they face specific needs, may still apply through existing need-based exemptions, such as Blue Badge or individual-circumstance exemptions.</p> <p>The recommended ETO route allows the Council to evaluate whether the residence-based exemption remains proportionate and equitable in practice before any permanent decision is taken</p>
<p>Criticism of consultation process and lack of transparency</p>	<p>This objection theme centred around the point that Cabinet had taken a decision<sup>6</sup> (in June 2025) prior to statutory consultation taking place. The suggestion made was that the Council had predetermined that the exemption would be implemented.</p> <p>The council disagrees with this suggestion. The June 2025 Cabinet decision authorised commencement of statutory consultation on the proposed amendment and made clear that the Council would be required to consider all objections duly made before determining whether to make the associated traffic order, in accordance with LATOR. The Cabinet report also confirmed that the outcome of the consultation, together with officer recommendations, would be brought forward in a subsequent report for decision by the Corporate Director of Environment and Resident Experience (or Cabinet if a key decision was required).</p> <p>In relation to the statutory consultation itself, the Council has complied with—and in several respects exceeded—the requirements of LATOR. Consultation on the draft order was carried out between 16 July and 10 September 2025, substantially longer than the 21-day minimum period set out in the Regulations. Public notices were placed on street; approximately 3,800 properties received a consultation letter and plan; the draft order and supporting documents were published on the AppyWay portal; materials were made available online and, by request, in accessible formats; and direct communications were issued to statutory consultees, emergency services, community groups and ward members.</p>

<sup>6</sup> <https://www.minutes.haringey.gov.uk/ieListDocuments.aspx?MIId=11157>

In view of the above, the Council considers that it has complied with LATOR and with its constitutional and delegated decision-making processes. The recommended use of an ETO further reinforces transparency by providing a six-month statutory objection period after implementation, allowing residents and stakeholders to submit representations based on real-world experience before any permanent decision is made.
--

### Statutory Consultees (Regulation 6)

- 6.14. Although there is no requirement to consult the general public before an experimental traffic order is made, statutory consultees need to be notified, which has been done by e-mail. No responses had been received from those consultees when this report was finalised, however, if responses are received and raise concerns not already considered by officers as set out in this report, those concerns will be reported to the Corporate Director of Environment and Resident Experience to consider together with officers' recommended response.

## **7. ETO monitoring framework**

- 7.1. If approved, the ETO will operate for a maximum period of 18 months. During that time, monitoring will include:
- Traffic volumes and speeds (automatic counters, manual surveys). These surveys will be carried out 'before' the ETO is introduced and once the scheme was operational.
  - Road danger indicators (collision data, speed surveys).
  - Exemption permit uptake
  - Compliance analysis
- 7.2. Opportunity for any person to object to the ETO for a period of six months from the date the order is made (that period would be extended for a further six months if any modifications to the ETO are made within the first 12 months of operation).

## **8. Project costs**

- 8.1. The total estimated cost associated with the recommendations is £30,000, excluding staff costs.
- 8.2. Aspects covered by the total cost include traffic signs, consultation and communication costs and traffic counts. These costs are required to enable the delivery of the project.
- 8.3. These costs will be fully met from the Council's Capital Programme (Scheme 4014- Walking and Cycling Action Plan (LTN))

## **9. Duties under s122 RTRA/s16 NMA/human rights**

- 9.1. The Council has a duty under section 122 of the Road Traffic Regulation Act 1984 (RTRA) 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.

9.2. The decision-making process also engages the network management duty in section 16 of the Traffic Management Act 2004 (NMA). 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.

9.3. Whilst amending the LTN 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 LTN is deemed to serve the general public interest, particularly regarding public health and safety. The proposal has been designed to ensure any interference is proportionate.

## **10. Contribution to the Corporate Delivery Plan 2024-2026 high-level strategic outcomes**

10.1. The proposal supports the Corporate Delivery Plan 2024–26 by:

- 10.2. Increasing opportunities for residents to participate in decision-making through consultation and engagement.
- 10.3. Maintaining safe, clean and green neighbourhoods by preserving LTN integrity while addressing equity concerns.

## **11. Carbon and Climate Change**

11.1. The proposal broadly aligns with the Climate Change Action Plan objective to reduce emissions from road transport by maintaining LTN principles and limiting exemptions to a defined group.

## **12. Statutory Officer Comments**

### **Finance**

12.1. The reports seeks approval from the Corporate Director of Environment and Resident Experience to implement the Experimental Traffic Order (ETO) to

amend the Gloucester Road traffic filter for a maximum period of 18 months. The amendment will enable the residents of Broadwater Farm to use their motor vehicle to pass through the filter.

- 12.2. The expected costs associated with this change is circa £30k which will be financed from the Capital Programme (Scheme 4014- Walking and Cycling Action Plan (LTN)).

### **Procurement (BV/ERE - 2/26)**

- 12.3. There are no procurement implications arising from the recommendations set out in 2 above

### **Legal**

- 12.4. The Council can make experimental traffic orders to restrict the movement of vehicular and other traffic (including pedestrians) on an experimental basis under sections 9 and 10 of the Road Traffic Regulation Act 1984.
- 12.5. There is no requirement to consult the general public before an experimental traffic order is made but when a consultation has been undertaken, like has been done in respect of the proposed amendment to the LTN Exemptions in relation to the Gloucester Road traffic filter, the Council must take into account the representations received in response to that consultation before taking a decision.
- 12.6. The representations received in the respect of the consultation undertaken in respect of amending the LTN Exemptions in relation to the Gloucester Road traffic filter on a permanent basis are sent out in Appendix A - Consultation Report to this report and officers' recommended responses regarding the same are set out in section 6 of this report. A judgment is to be exercised as to how much weight each representation should carry and whether or not to approve any of the measures in the proposals in light of those representations.
- 12.7. The Courts have held that a decision maker must consider consultation responses with 'a receptive mind' and be prepared to change course if persuaded by a response, but is not under a duty to adopt the views of consultees.
- 12.8. The decision to approve the amendment to the LTN Exemptions in relation to the Gloucester Road traffic filter is an executive decision that can be exercised by the Corporate Director of Environment and Resident Experience in accordance with the Council's Constitution.

### **Equality**

- 12.9. The Council has a Public Sector Equality Duty under the section 149 of 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 those protected characteristics and people who do not

- Foster good relations between people who share those characteristics and people who do not.
- 12.10. The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.
- 12.11. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

#### Summary of the Equality Impact Assessment (EqIA)

- 12.12. The Equality Impact Assessment (Appendix B) undertaken for this proposal identifies that introducing a residence-based exemption for eligible residents of Broadwater Farm is expected to have positive or neutral equality impacts overall. Broadwater Farm has comparatively low public transport accessibility, sits at the centre of the borough's largest LTN and has below-average car ownership, which together result in longer diversionary routes to the south than for most other LTN households.
- 12.13. Consultation commenced in July 2025 which included publication of a notice of proposal, on-street notices, a letter drop to Broadwater Farm and nearby streets likely to experience routing changes, emails to stakeholders/ward members, and use of local networks. Engagement ensured accessibility for protected groups (plain-English materials, accessible formats on request, and channels suitable for residents with limited digital access).
- 12.14. Consultation responses from supporters referenced accessibility and mobility needs, including for disabled residents, older people, carers, pregnant women and families with young children. The proposed exemption is therefore expected to reduce journey times for essential trips for these groups while preserving the wider benefits of the LTN.
- 12.15. The EqIA finds no evidence of direct or indirect discrimination. The proposal does not alter or diminish access to any of the Council's existing need-based LTN exemptions, which remain available to residents with protected characteristics (including Blue Badge, SEND transport and individual-circumstance exemptions). Potential adverse impacts, such as possible increases in vehicle movements on neighbouring streets, will be monitored during the Experimental Traffic Order (ETO) period. The ETO provides safeguards, including a statutory six-month objection period after implementation and the ability to modify or revoke the arrangements if monitoring indicates disproportionate impacts on any protected group.
- 12.16. The EqIA will remain a live document during the experimental period and will be refreshed as monitoring data and feedback are received. If the evidence indicates unintended negative impacts for residents with protected characteristics, further mitigations or adjustments will be considered before any decision is made to make the arrangements permanent.

### **13. Use of Appendices**

Appendix A – Consultation report

Appendix B – Equality Impact Assessment  
Appendix C – Exemption criteria  
Appendix D – Proposed ETO Plan

**14. 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](#)
- 17/6/25 – [Cabinet approval of Broadwater Farm Resident Access](#)