



RE: East London Joint Waste Plan consultation

From Andy Brooke [REDACTED]**Date** Wed 28/05/2025 09:26**To** Tom Bogdanowicz <Tom.Bogdanowicz@lcc.org.uk>; eljointwasteplan <eljointwasteplan@haverling.gov.uk>**Cc** DAVIES Glen <glen.davies@ext.soprasteria.com>; Lilli Matson <LilliMatson@tfl.gov.uk>

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Good morning all,

We would welcome the opportunity to introduce CLOCS as a recognised national standard and a framework to ensure all stakeholders are working to create the right environment for the safest vehicle journeys. Unfortunately, road safety is often seen as a problem belonging only to fleet operators and while operators certainly have a role to play in improving vehicle and driver standards, the client and contractors can also do their bit to mitigate the risks to vulnerable road users and the communities they work in.

The CLOCS Standard includes requirements around logistics planning, risk assessments, route planning, traffic marshals, vehicle checks and much more, all of which complement the efforts made by operators.

Waste operators have these same responsibilities and should be asked to look at their own site operations as part of this consultation.

If there is an opportunity to speak to the relevant parties, we would be delighted to provide a presentation live or over Teams. Further information on CLOCS can be found [here](#) and the CLOCS Standard is [here](#) with an easy-to-read summary further down that page.

If you have any queries at all, please don't hesitate to get in touch.

Kind regards,

Andy

Andy Brooke | CLOCS Programme Director

Mobile No: 07841708675 | **Email:** andy.brooke@secbe.org.uk

South East Centre for the Built Environment Limited, 100 Longwater Avenue, Green Park, Reading, RG2 6GP

Company No: 5338703 VAT No: 861 533 624

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From: Tom Bogdanowicz <Tom.Bogdanowicz@lcc.org.uk>**Sent:** 20 May 2025 15:10**To:** eljointwasteplan@haverling.gov.uk**Cc:** Andy Brooke <andy.brooke@secbe.org.uk>; DAVIES Glen <glen.davies@ext.soprasteria.com>; Lilli Matson <LilliMatson@tfl.gov.uk>**Subject:** East London Joint Waste Plan consultation

Dear Sir or Madam,

We write, on behalf of the London Cycling Campaign, in response to the consultation on the East London Joint Waste Plan.

Our prime concern is the safety of vulnerable road users.

FORS and CLOCS

The Plan statements on road safety (cited below) should be clearer regarding what site owners and contractors must do, and should, in addition to specifying FORS (Silver grade rather than just registration) as a requirement, and DVS (which is mandatory across all of Greater London anyway), require that all waste operations and sites meet the Construction Logistics and Community Safety (CLOCS) standard notably with regard to marshalling at entrances and agreed road access routes to sites. Either CLOCS (c/o SECBE) or TfL can provide full details of FORS, [CLOCS](#) and suitable wording for the document.

Hardstanding

We were unable to find reference in the document to specification of level hardstanding access to landfill sites, whether in London or beyond. Provision of hardstanding areas for vehicles at landfill and other sites eliminates the need for using N3G (off-road) HGVs which represent a significantly higher degree to danger to vulnerable road users. This [document](#) explains the issues and provides specification for good practice sites.

6.100 Proposals should reference the use of Direct Vision Lorries for waste vehicles or the use freight operators who can demonstrate their commitment to TfL's Freight Operator Recognition Scheme (FORS) or similar.

6.101 Transport for London's (TfL) Direct Vision Standard (DVS) for HGVs should be applied and freight operators should demonstrate their commitment to TfL's Freight Operator Recognition Scheme (FORS) or similar. The DVS is intended to enhance road safety by ensuring that HGV drivers have better visibility, thereby reducing the risk of accidents involving vulnerable road users like pedestrians and cyclists.

Copying Andy Brooke at Secbe, Glen Davies at FORS, Lilli Matson at TfL.

Best regards,

Tom Bogdanowicz

Senior Policy and Development Officer

Correspondent *London Cyclist*

[London Cycling Campaign](#)

020 7234 9310



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