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## East London Joint Waste Plan consultation

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From Tom Bogdanowicz [REDACTED]  
Date Tue 20/05/2025 15:13  
To eljointwasteplan <eljointwasteplan@havering.gov.uk>  
Cc [REDACTED]

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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 of 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,

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Tom Bogdanowicz  
Senior Policy and Development Officer  
Correspondent *London Cyclist*

[London Cycling Campaign](#)



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