

Submission on 'Infrastructure for a Better Future'

[REDACTED], 14.6.21

The number of heavy trucks being driven through Wellington from the motorway through Vivian Street, Victoria Street, Webb Street, Willis Street, Brooklyn Road, Owhiro Road and Happy Valley Road to and from the Southern Landfill and C and D and T&T Landfills is excessive and is harming the people who live in, work in and use these streets and roads. People including pregnant women, children, the elderly and people with disabilities, are dealing with noise, diesel fumes and particles from uncovered loads polluting the air in their homes and workplaces, along with flying litter and debris and traffic hazards, both as road users and pedestrians. In response to this I opened an petition on the Wellington City Council website entitled '*Stop trucks coming off the motorway and using Wellington streets to transport waste to tips*'. It closed on 1 June 2021 with 52 signatures and will be presented to the Environment and Planning Committee of the WCC on 24 June 2021. The petition can be viewed here <https://wellington.govt.nz/have-your-say/petitions/petitions/closed/2021-02-stop-trucks-coming-off-motorway-and-using-wellington-streets-to-transport-waste-to-tips>

Local people can to some extent, understand waste being transported right by them from local projects. Petition signees have indicated that waste generated beyond their local area should be banned from the landfills on Happy Valley Road as we have human and legal rights to noise levels that are not excessive, traffic safety on our roads, footpaths and at our bus-stops and crossings; and, clean air in our homes, workplaces and streets. See the appendix to this submission for data on truck numbers and air quality. I have identified the following factors as potentially able to help with the situation:

- Policy analysis. When local government analyses and develops policy options, it needs to include the minimization, eradication and avoidance of harms from the transport of waste and other transport as an important criteria for analysis.
- Policy Developments. The Solid Waste Management and Minimisation Bylaw, WCC, 2020 introduces new construction and demolition waste planning requirements for high-value building projects (valued at \$2 million or more); and, the establishment of waste operator licensing by February 2023 (applicable to waste collectors who transport more than 20 tonnes of waste per year). It is good that these initiatives will eventually provide more data. My question is does the new bylaw reflect the sacrifices some Wellingtonians are being required to make to their health and safety and how long term detrimental will the effects on them be?
- Policing. All trucks need to have their commercial vehicle inspection certified at Level 7, which is: Carried out by qualified vehicle safety officers (VSOs), constables or road police, and focuses on exhaust. Police should also enforce covering of loads. <https://www.police.govt.nz/advice-services/driving-and-road-safety/commercial-vehicle-safety-team-cvst>
- Location of where waste is deposited. Councils should source landfills out of the pathway of residential suburbs to dispose of dirt and demolition waste, as well as divert waste into other projects e.g. infill, new roads, cycle trails. If material is being recycled it is being trucked in and then out again polluting the same roads twice. The Southern Landfill is the only tip in the Wellington Region to take asbestos, which means a lot of extra truck kms.

- Use of electric trucks, biofuels and green hydrogen.
- Minimise need for waste as a mixer. E.g. currently bulk (non-compacted) waste is taken to the Southern Landfill to be mixed with sewerage sludge in Wellington.
- Compact any waste that is to be transported.
- Specialised truck highways and routes. Create underground rail or road tunnels from the motorways to tips. Ferry vehicles containing waste to tips.
- Do not use tips to revenue raise: E.g. consultation about the proposed extension of the Southern Landfill in Wellington resulted in an unreasonably high weighting attached to revenue raising, compared with other criteria against which the proposal was to be assessed. I was surprised by this as I attended a couple of consultation meetings and no-one that I heard speak mentioned any value attached to revenue raising at all. In the other hand we need to discourage situations where waste is transported to a tip further away because of cheaper pricing.

My epetition does not mention it, but another problem in our neighbourhood is the diesel buses that have been used since the trolley buses were taken away. I support actions to decarbonize the public transport fleet.

Data Appendix

Quantity of trucks

Data on trucks going towards the three Wellington tips (from the local area, as well as from the motorway) has been provided by two sources:

1. A petition signee who wishes to remain anonymous:

“Over the past couple of years I have noticed the number of heavy trucks driving south and north on Brooklyn Road and then Owhiro Road to and from the Southern Landfill (probably T&T Landfill as it is trucks) has increased dramatically. Over summer last year, over a four day period, I counted the number of heavy trucks only (excluding vans, utes and cars). They were constant and during one, 1 hour period at 11am on each of these days I counted 150 trucks (roughly 75 going to the landfill, and 75 going back towards town).”

Source: Email to [REDACTED], 17.3.21.

Monday 3 May 2021, 2.15-3.15pm, note the road was officially closed during the time of this count due to a traffic accident. “I was standing near the bus stop at the entrance to the Helen Street ramp. There were 80 trucks uphill and 36 downhill, many carrying dirt uphill. This was not cars, vans, utes, buses or light trucks - only big trucks (one tray and two-tray) = 116 big trucks per hour. Around one-quarter had very heavy loads (e.g. cranes, big loads of wood, cars). They were particularly noisy, and I could hear them coming from about 200 metres away either side (from probably around the Washington Avenue turnoff for the uphill ones and from even before the Brooklyn lights for the downhill ones). Trucks and traffic have been moving solidly all afternoon near the top of the hill. I heard the sirens around that time and saw ambulances going past. I saw some coming downhill with dirt in them - must have been turned around.”

Source: Email to [REDACTED] 3.5.21.

Tuesday 4 May 2021, 12.15 to 1.15pm. “84 uphill and 34 downhill = 120 trucks an hour. There were uncovered dirt trucks, plus [REDACTED] has demolition waste trucks that are very noisy and have uncovered loads of construction waste. This is where the particles fly off, especially in the wind. More buses today - hardly any yesterday because they would have been diverted because of the accident.”

Source: Email to [REDACTED] 4.5.21.

Wednesday 5 May 2021, 9.15 to 10.15am. “Big trucks only - 76 uphill and 56 downhill = 132 an hour. Several trucks had construction rubble, especially broken up concrete or bricks or just tangled material with reinforcing in it. Brick and concrete dust are both bad. Two more truck names are [REDACTED] (the latter had a huge, heavy and noisy truck).”

Source: Email to [REDACTED] 5.5.21.

2. [REDACTED], Chief Infrastructure Officer, Infrastructure and Delivery, WCC

First count done in June 2016 on Brooklyn Rd between Bidwell Street and Washington Avenue

- Average Heavies per day – 80 (driven up by large number of Class 14 vehicles - 18 wheelers etc.)
- Average number of rubbish truck type heavies per day - 199

Second count done in March 2019 on Brooklyn Rd between Nairn Street and Bidwell Street

- Average Heavies per day – 49 (not so many Class 14 trucks)
- Average number of rubbish truck type heavies per day - 126

Source: Email to [REDACTED]

13.4.21, from [REDACTED]

Air Quality

I put together the following table using data from the GWRC's Air quality monitoring reports <http://www.gw.govt.nz/air-quality-2/>, using the current air quality data for Willis Street AQ, for the Tuesday after Easter 6.4.21.

| | Highest level (time) | 11am | 3pm |
|---|------------------------|------------|-----------|
| Black Carbon (AE33) (ug/m3) | 7.939 (12.51pm) | 0.439 | 1.042 |
| Black Carbon UVPM (AE33)(ug/m3) | 11.721 (8.24am) | 0.519 | 0.914 |
| Carbon Monoxide (ppm) | 0.4444822 (9.15am) | 0.0736764 | 0.1162347 |
| Carbon Monoxide 1 hr fixed average (mg/m3) | 0.3248793 (9am) | 0.1265366 | 0.1319257 |
| Carbon Monoxide 8 hr moving average (mg/m3) | 0.2128980 (2pm) | 0.2000994 | 0.2016467 |
| Carbon Monoxide 8 hr moving average (ppm) | 0.1703184 (2pm) | 0.1600795 | 0.1613174 |
| Nitric Oxide (ppb) | 15.4840700 (8.40am) | 4.5759500 | 4.2209210 |
| Nitrogen Dioxide (ppb) | 15.9146900 (8am) | 5.4510780 | 3.7180060 |
| Nitrogen Dioxide 1hr Average (ug/m3) | 25.1012780 (3am) | 12.0786348 | 9.9863720 |

N.B.: It is expected that levels would be higher in Webb Street before the intersection with Willis Street and at the Brooklyn traffic lights.