

WEPA



Willoughby Environmental Protection Association

30 March 2023

Sent via email

Dear Mayor and Councillors,

I am writing on behalf of the Willoughby Environmental Protection Association (WEPA) to raise our concerns about plans to cover an 80m sq area alongside the Northbridge Baths with artificial turf as part of the upgrade for this site. I understand that the infill is to be sand and that crusher dust will be laid underneath. We are concerned with this proposal for the following reasons:

- It is well known that plastic grass deteriorates over time and that parts of the blades migrate into surrounding areas. These plastics will end up over time in the baths and nearby bushland either via people's feet or through wind, hosing, rain or wave movement;
- research by the award-winning [Australian Microplastic Assessment Project](#) (AUSMAP) with Northern Beaches Council, funded by the NSW Environment Protection Authority, has noted that microplastics from synthetic turf are being found in heavy quantities in waterways near synthetic turf fields – this would be no different;
- the [NSW Synthetic Turf Study In Public Open Space Report](#) (p.38; p.40, p.45) prepared for the Department of Planning, Industry and Environment in August 2021 noted the propensity for overland water movement across synthetic turf to pollute waterways;
- this material will add to the microplastic load already being found at disquieting levels in our waterways and harbour and being ingested by fish and eventually humans (eg see [Sydney beaches and rivers contain high levels of microplastics, scientists find - ABC News](#));
- as the plastic grass is not as permeable as natural turf or sand it will accumulate lotions, food scraps, dirt etc and will need to be washed down. To keep the artificial surface hygienic, it is likely that chemical disinfectants will be required. The likelihood is that this will be washed into the baths;
- artificial turf is far hotter than grass or natural turf (even hotter than concrete) unless you wet it down at which stage this potentially polluted wastewater may enter the baths;
- there is accumulating research on the health impacts of the plastics in artificial turf and potential off-gassing while people and particularly children are lying and playing on such a surface – until the NSW Chief Scientist reports on this subject and more is known about these health impacts the precautionary principle should be applied;
- the foreshores around the baths currently have a unique natural look with bushland, coastal rocks and native eucalypts and also provide feeding grounds and habitat for local land-based

and aquatic animals. Artificial turf creates a biodiversity desert and increasing research is detailing its negative impact on the health of nearby bushland;

- crusher dust is proposed as a base for the artificial turf. It is generally used under pathways as it solidifies and stabilises the surface layer. There is concern that, as this base solidifies with footfall, it may impact the root systems of the angophora and other trees nearby;
- finally, there is no full-life recycling of artificial turf. It is not a sustainable product. Once it has worn out over a few years it will end up in landfill where it will continue polluting.

WCC has a strong commitment to [keeping our waterways clean](#) and [reducing plastics](#). While this may be a small part of the landscaping at the baths, it is a total inappropriate site for its use and fails to live up to the principles espoused by Council.

We would like to see the artificial turf proposed for the baths replaced with sand alone - which one would have thought far more appropriate for a beach next to a tidal pool in Middle Harbour.

I look forward to receiving your response to the issues raised above.

Regards

Dr Meredith Foley

Secretary, WEPA

wepa.org.au

wepasecretary@gmail.com

For further information about our concerns with the use of artificial turf in Willoughby LGA please see [WEPA Submission on the Use of Synthetic Alternatives to Natural Turf in Public Open Spaces](#)

3 June 2021