**Note: submissions can be made here:**[*https://www.planning.nsw.gov.au/policy-and-legislation/open-space/synthetic-turf-study*](https://www.planning.nsw.gov.au/policy-and-legislation/open-space/synthetic-turf-study)

**Submissions close 29 April, 2024**

*Dear sir/madam,*

**Submission to Draft Guidelines on Synthetic Turf in Public Open Space**

I/we take this opportunity to comment on the adequacy of the Draft Guidelines on Synthetic Turf in Public Open Space.

Unfortunately, the Draft Guidelines are seriously unbalanced. Just one page and the odd scattered sentence are devoted to the serious environmental and health dangers of synthetic or plastic turf. However 30 pages are devoted to Guidelines – and they are no more than mere guidelines – to the installation of plastic grass playing fields. The Draft Guidelines err too heavily in promoting rather than seriously advising on synthetic or plastic turf.

Specifically, I/we would like to make the following submissions:

1. Given the health and environmental dangers of plastic turf – as cursorily outlined on page 18 of the Draft Guidelines – we believe that the Guidelines should recommend the precautionary principle i.e. when in doubt about the serious and negative impacts of a project, it is best to delay implementation.
2. A further reason for a practical moratorium on the installation of plastic grass field is the fact that an inter-departmental committee is still working on recommendations flowing from the report of the Chief Scientist and Engineer on synthetic or plastic grass issued in 2022. That response is to go to State Cabinet for decision later in 2024.
3. Sites listed on the State Heritage Registry should be specifically excluded from the installation of plastic turf fields. The use of such materials in heritage sites is discordant with their character.
4. The Guidelines should mandate the responsibility of the Department of Planning and the Environmental Protection Agency to issue regular updates about scientific research into the health and environmental impacts of plastic turf, news of action taken overseas in relation to plastic turf and the latest advice on the installation and proper maintenance of natural turf playing fields.
5. If, despite considering the environmental and health dangers and the advisability of applying the precautionary principle, a public body insists on proceeding with the installation of plastic turf then there should be the following statutory requirements:
* all the chemicals used in the composition of the proposed plastic turf field shall be listed in the Development Application
* an Environmental Impact Assessment shall be undertaken by a body approved by the Environmental Protection Agency and subject to public exhibition and comment for at least 28 days
* the Heritage Council is notified of the project and the Council required to advise on permissibility and/or suitability of the proposed installation
* these steps shall be taken and reported to the decision-making body prior to the decision to proceed to public exhibition of the DA for the plastic turf field or fields
* the DA is to include a mandatory environmental and financial assessment of the natural turf alternative
* the DA will also list what pre-existing social and sporting activities will be excluded by the installation of plastic turf
1. The Draft Guidelines refer to the development of guidelines for best practice irrigation of natural turf fields. Details of this project including timelines and stakeholder involvement should be made publicly available. These guidelines must cover both installation and maintenance protocols, aligning with sustainable and efficient water use strategies for public open space management. We believe an example of comprehensive guidelines can be found at <https://www.hunterwater.com.au/home-and-business/information-for-business/best-practice-guidelines>
2. The Guidelines should also include references to the latest best practice for the installation and upkeep of natural turf fields.

I/we look forward to a positive response to this submission,

Yours faithfully

Name:

Address:

Email: