



MEETING PAPER

Subject: DC/25/0008/FUL - Barnards Meadow Barnards Way Lowestoft Suffolk - Resurfacing of the existing 3G pitch, in addition to increasing the pitch footprint on the northern side. Associated development comprising the installation of a fence around the new spectator area, along with other minor works and refurbishment

Meeting: Planning Committee

Date: 27 February 2025

CONFIDENTIAL/NON-CONFIDENTIAL

Recommendations and sources provided by the Committee members:

Under delegated authority, the Planning Committee provided the following consultee response:

The Planning Committee of Lowestoft Town Council considered this application and it was agreed to recommend refusal of the application on environmental and health grounds as the rubber crumb infill used for 3G pitches presents an environmental hazard and adds pollution to the environment. Should the Local Planning Authority be minded to approve the development, the Committee requests the application be addressed by the East Suffolk Council Planning Committee, due to the public health implications, and that Lowestoft Town Council be permitted to send a representative to the meeting to speak on the Town Council's position and concerns.

The following sources were supplied by members of the Committee to support this response:

The following link on the position of 3G pitches by Sport England was supplied: [Position statement on 3G pitches | Sport England](#)

Real grass pitches have lots of benefits for the environment, including absorbing carbon dioxide, producing oxygen, cooling the air, and creating a home for wildlife especially insects, which 3G pitches do not provide. Whilst they are great for ensuring that athletes can play sports all year round, 'third generation' (3G) artificial grass pitches come with a host of environmental concerns including the use of microplastics, flooding risks, the inability to recycle them, negative impact on biodiversity and increased temperatures.

3G pitches are made of a rubber crumb infill which is composed largely of recycled tyres (which presents an environmental hazard) this is to keep the artificial fibres upright and to provide a more realistic playing surface. However, this infill material is easily dislodged from the pitches onto the skin, clothing and shoes of sports players. Additional rubber is also blown or washed off pitches by

poor weather and these ragments of rubber infill then find its way into sewers, resulting in an increased number of microplastics in our oceans.

Waste management is also a huge problem for this industry, with artificial grass pitches lasting just under ten years. The cost of landfilling artificial grass is high and there are no verified recycling options available in the UK at present. More recently, many of the materials used in the pitches are recycled but these still need to eventually be disposed of when the pitch comes to the end of its life.

It adds pollution to the environment and is going to be banned in the EU from 2031.

[GENAN Q and A Infill 120324 UK.pdf](#)

The rubber crumb has also been linked to health issues

[Rubber Crumb - Is it the new asbestos? | Pitchcare](#)

The design and access statement (pg. 16) states a shock pad will be laid beneath the turf, which allows for a reduced amount of infill, with several infill mitigation measures also to be installed (pg. 22) including infill containment barrier, decontamination grates, boot cleaning stations and a mowing margin to prevent grass contamination. But how will the applicant prevent wind-blown contamination and how do they intend to dispose of the old artificial grass pitch in a sustainable way?

Feedback received from East Suffolk Council:

On submission of the consultee response agreed under delegated authority, we received the following query from East Suffolk Planning:

Can I ask how the Town Council has reached this conclusion that the replacement 3G sports pitch is an environmental hazard and adds pollution to the environment? This application is for a replacement 3g Sports pitch and new spectator area to provide improved facilities for Suffolk FA. The current facilities are at the end of life and are in need of replacement/renewal, as evidenced by the applicant and Sport England.

Sport England raise no objection to the application and Environmental Protection Officers raise no objection or comments either. If there were environmental hazards or a risk of pollution/contamination risk from the resurfacing material, this is a matter that environmental health officers would have raised in their response.

The applicant provided the following clarification on this matter:

I can confirm that there are no environmental impacts associated with the replacement 3G sports pitch surfacing material.

The design includes the industry recommended practice of installing infill retaining boards to the inside of the fence to prevent the migration of rubber infill outside the pitch and also installation of floor grilles and boot brushes outside the gates to further guard against carry over of rubber crumb infill.

Ultimately, the key objective of this application is to provide a modern and safe football facility for the health and wellbeing of the local community and all other users groups.

East Suffolk Council hopes this addresses any concerns raised.

East Suffolk Council also confirmed Sport England, the statutory consultee on sports related planning applications in England, raised no objection, but they requested a planning condition to ensure the Artificial Grass Pitch meets FIFA Quality Concept for Football Turf – FIFA quality or equivalent internal standard. This is designed for pitches that undergo a rigorous array of tests evaluating durability, safety and performance. (This consultee comment can be found on the East Suffolk Planning portal, [submitted 14 February 2025](#)).