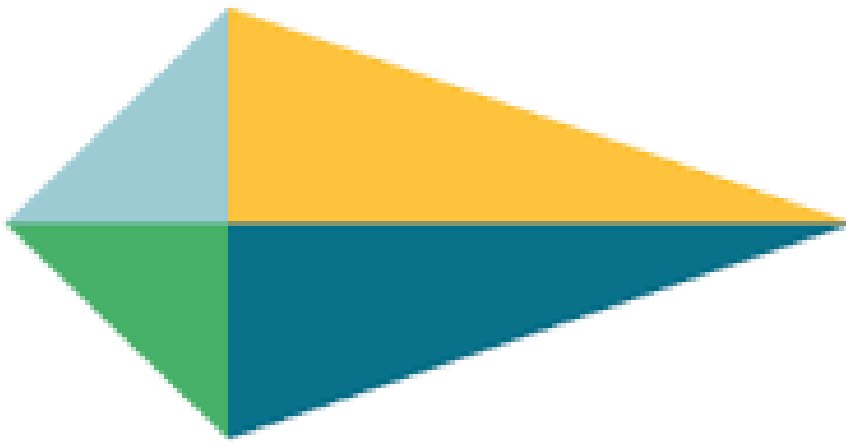


# East Suffolk Council Leisure



November 2024

East Suffolk Council Policy for new  
Artificial Grass Pitches (AGP's)

## 1. Introduction to report:

Artificial Grass Pitches (AGP's) have been seen to provide a high-quality surface that are an integral part of modern community sport. They are durable, all year-round playing surfaces that can be used intensively in all weathers. If properly maintained, they can provide up to 80 hours a week playing opportunities which compares favourably against grass pitches which on average can sustain 6 hours of playing time per week.

East Suffolk has a limited number of pitches in the district, but clubs and other organisations are keen to provide more to help develop football and opportunities for the community and funding applications, including CIL, are increasing. The cost of a new AGP with surface, fencing and floodlights is more than a million pounds for each facility.

The problem that East Suffolk Council (ESC) and other councils are facing is the environmental impact of these pitches. These have mostly related to microplastics in the form of rubber infill getting into the ecosystem, chemical leaching into the soil, loss of greenspace, excessive heating, surface water run-off and the need for greater focus on the end-of-life recycling of pitches. In September 2023, the European Union (EU) Commission completed the adoption of the EU REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) restriction on the sale of intentionally added microplastics onto the European market, which includes rubber infill for 3G AGPs.

The Commission has confirmed an eight-year transition period before the new restriction becomes effective and from October 2031, you will no longer be able to purchase rubber crumb within the EU.

The ruling does not prevent the continued use of this material for AGPs, nor does it prevent the construction of new pitches with rubber crumb infill before 2031 – but it may make the maintenance of these pitches after this time difficult, due to accessing material.

The Department for Environment, Food & Rural Affairs (DEFRA) recently commissioned an evidence-based project to review emissions of intentionally added microplastics in the United Kingdom (UK), including rubber infill.

DEFRA is expected to report the projects findings in spring 2025 and will inform any future regulatory actions in the UK.

The Sports Councils – Sport England, Sport Wales, Sport Scotland, Sport NI – and leading sport bodies continue to work together and with respective governments to understand what the EU ban will mean for the stock of 3G AGPs in the UK, and the timings for any legislative decisions.

Therefore, this policy sets out to advise ESC officers and members when making decisions on funding applications for clubs and organisations to

build AGP's until the outcomes and directions from the DEFRA report is completed and published, when this will be further reviewed by ESC. It is important to note that this policy relates to decisions ESC may make in respect of AGPs on our own land and assets or where ESC funding is involved. This policy does not influence planning decisions and is not planning policy. At the present time it is unlikely that an AGP could be refused planning permission on environmental grounds so long as the correct pollution prevention measures are included in the design

Where possible the surface or the location of the Artificial Grass pitch should support other sports.

## 2. Background:

In 2019 Suffolk Football Association (Suffolk FA), produced as part of a national piece of work, the East Suffolk Local Football Facility Plans (LFFP's). Within this work, all local football clubs were contacted by a consultant to understand the club's current facilities, their ambitions for development and growth and their facility needs to achieve this. From this work, the improvement needs for clubs and organisations were identified to support the development of their facilities and therefore increase participation and standards. A list of new third generation pitches were identified across the district. Please note FTP is Football Training Pitch.

# 3G FTP'S

**East Suffolk – 2020 LFFP position**

534 teams and a need for 14 11v11 3G FTPs

Supply (2020): 1x 11v11 Alan Hutchinson Field, Bernards Soccer School, Ipswich FC Training Ground, Kesgrave High School and Kirkley & Pakefield Sports and Social Club

Shortfall of **ten** 11v11 3G FTPs - Ipswich Town FC not available for community use.

Identified LFFP projects (2020):

1) Felixstone Leisure Centre	8) Leiston Leisure Centre
2) Waveney FC	9) Halesoworth Area
3) Felixstowe & Walton FC	10) Bungay Town FC
4) Framlingham Sports Ground	
5) Kesgrave Community Centre or Kesgrave High School	
6) Woodbridge/Ufford Area	
7) Oaks Farm	

Logos: UK Government, Premier League, Football Foundation, FA. Text: TOGETHER FOR FOOTBALL

### East Suffolk Local Football Facility Plans - Steering Group REFRESH



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East Suffolk has several 3G pitches on the 'planned/required' list within the East Suffolk Local Football Facility Plan. In 2021, the first LFFP's were produced for all districts and boroughs in the country and the East Suffolk

plan is produced by the Suffolk Football Association and supported by the Football Foundation and Sport England.

As the Local Football Facility Plans (LFFPs) are now five years old they are being reviewed to bring the plans up to date. The Football Foundation has commissioned consultants at KKP to lead this process alongside the County FA, in which there are also colleagues from Sport England represented.

An initial meeting was held on 24<sup>th</sup> July 2024 to review the previous LFFP and consider potential projects.

In the previous LFFP, it was identified there were over 500 teams in East Suffolk and a shortfall of 10 AGP's.

### **3. Overview:**

ESC does not presently have any directly owned 3G pitches, however, there are several that are planned for both directly owned ESC land or land leased out to football clubs and other non-East Suffolk land. The East Suffolk Local Football Facility Plan was produced 5 years ago and is currently being reviewed. Areas identified as requiring a 3G pitch in the current document include:

- Leiston (on Alde Valley Academy) to be shared between the Academy and ESC
- Proposed new Felixstowe Leisure Centre
- Dellwood Avenue (Felixstowe and Walton FC)
- Halesworth
- Kesgrave
- Lowestoft
- Framlingham
- Bungay

# 3G FTP'S- 2024

East Suffolk PPS - 2021

Analysis area	Number of teams (20/21 season)	3G requirement	Current number of available 3G pitches	Potential shortfall
Area 1 - Aldeburgh, Leiston, Saxmundham & Villages	40	1	-	1
Area 2 - Beccles, Bungay, Halesworth & Villages	80	2	1	1
Area 3 - Carlton Colville, Kessingland, Southwold & Villages	27	1	-	1
Area 4 - Felixstowe Peninsula	65	2	-	2
Area 5 - Framlingham, Wickham Market & Villages	40	1	-	1
Area 6 - Kesgrave, Rushmere St Andrew, Martlesham, Carlton & Flynn Valley	105	3	1	2
Area 7 - Lowestoft & Northern Parishes	132	3	2	1
Area 8 - Melton, Woodbridge & Deben Peninsula	41	1	-	1
East Suffolk	532	14	4	10

The revised LFFP will concentrate on AGP's and ancillary facilities such as changing rooms/toilets and car parking with specific targeting of female and disability access.

## INVESTMENT KPIs to FY25

3

National Football Facilities Strategy (NFFS) continues to be the 10-year strategy, with 5 key objectives of Quality, Inclusivity, Sustainability, Engagement and Usage. The following KPIs provide short term focus for identifying priorities locally and should flow through the methodologies where appropriate:

Priority	
Equal access for women and girls	100% of projects
Underrepresented groups	75% of projects
Levelling up	60% of projects in highest 40% of areas
On the pitch	75%+ of funding
Multi-sport: adding value to football	40% of projects adding value
Clubs & communities: investment and asset ownership	40% of projects



## 4. Conclusion:

Artificial Grass Pitches are excellent facilities to support sport in the community, especially for football. However, there are issues with the current 'rubber crumb' used as infill. Therefore, to balance between community sport facility benefits and the environmental issues, and until the DEFRA report, due to be published in 2025 and the subsequent findings are published, the following should be minimum requirements for ESC to support proposed

AGP funding applications being brought forward (this does not affect planning application decision making):

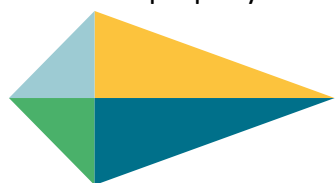
- The proposed facility must be included within the 2024 revised Local Football Facility Plans.
- The proposed facility must be supported by The Suffolk FA and Football Foundation
- The proposed request for funding should have the remainder of funding already confirmed and should not be more than 30% of the overall project funding required.
- The proposed facility must be constructed meeting the Football Foundation and European Technical Guidance since 2020, installing containment measures. These include: containment measures - containment barriers on a pitch's perimeter fencing, Installing decontamination grates and boot cleaning brushes at all player and vehicle entrance gates, ensuring all stormwater drains around a pitch have suitable microfilters to capture any infill being carried by surface run-off, etc and keeping a dedicated maintenance brush within the boundaries of the pitch, so it cannot carry infill into the surrounding environment.
- The applicant provides a business plan that shows at least a 10-year financial plan that includes maintenance and sinking fund for the pitch replacement.
- A development plan shall be produced that shows how the new pitch will increase participation and a proposed programme of use.
- The proposed new facility, if possible, should support other sports, e.g. rugby and if it is a replacement should not adversely affect other sports.

## **5. Joint Statement including Sport England, the Department for Culture, Media and Sport (DCMS), Sport Scotland, Sport Wales, the Grounds Management Association, Football Foundation, The Football Association, Cymru Football Foundation, Welsh Rugby Union, Rugby Football League, Sports and Play Construction Association and England Rugby:**

Artificial Grass Pitches (AGPs) provide a high-quality surface that are an integral part of modern community sport.

Recognised as durable, safe, year-round playing surfaces, they're able to withstand intensive use and all kinds of weather.

A properly maintained AGP can sustain up to 80 hours of use a week, providing an average of around 1,400 playing opportunities. This compares favourably to a good quality grass pitch, which can sustain just six hours a week, accommodating an average of around 100 playing opportunities.



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This means many people are able to engage in sport and physical activity regardless of the weather when otherwise matches would be cancelled.

AGPs therefore enable more people to experience the benefits of being active, such as improved physical health and mental wellbeing and improved confidence.

They're used for playing many different sports, including football, hockey and rugby; and provide safe spaces for people to come together and connect, helping unite communities.

It's critical that our sports facilities are flexible and resilient to reflect the real everyday requirements of users and meet societal changes.

However, concerns have been raised about the environmental impact of these pitches. These have mostly related to microplastics in the form of rubber infill getting into the ecosystem and the need for greater focus on the end-of-life recycling of pitches. We understand these concerns and are taking them very seriously.

In September 2023 the European Commission completed the adoption of the EU REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) restriction on the sale of intentionally added microplastics onto the European market, which includes rubber infill for 3G AGPs.

The Commission has confirmed an eight-year transition period before the new restriction becomes effective and from October 2031, you'll no longer be able to purchase rubber crumb within the EU.

The ruling does not prevent the continued use of this material for AGPs, nor does it prevent the construction of new pitches with rubber crumb infill before 2031 – but it may make the maintenance of these pitches after this time difficult.

The transition period is important because it allows the 3G AGPs that are in widespread use by communities across Europe, to continue to be used and maintained until they reach their end-of-life.

Replacement surfaces are very expensive, and many communities would simply be unable to afford to do so before the end of the transition.

The Department for Environment, Food & Rural Affairs (DEFRA) recently commissioned an evidence project to review emissions of intentionally added microplastics in the UK, including rubber infill.

The project is expected to report in spring 2025 and will inform any future regulatory actions in Great Britain.

The Sports Councils – Sport England, Sport Wales, Sport Scotland, Sport NI – and leading sport bodies continue to work together and with respective governments to understand what the EU ban will mean for the stock of 3G AGPs in the UK, and the timings for any legislative decisions.

As stakeholders, in the community sport landscape we're committed to exploring alternative artificial pitch systems, more sustainable infill products and increasing recycling capacity available to sports providers nationwide.

This commitment is reinforced through Sport England's Sustainability Strategy 'Every Move'. Sport England will work with partners and stakeholders, including the Football Foundation, to explore viable alternatives to the rubber infill used in third generation 3G AGPs and improved recycling opportunities and processes, given concerns about plastic pollution and waste.

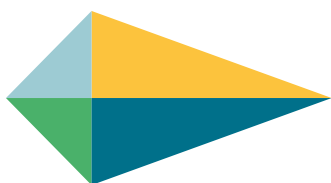
Examples of this include the Football Foundation's significant investment in its own 'test hub' to research alternative infill materials.

Many of the alternatives to rubber crumb are new to the market, and little is known about their performance, durability, availability, lifecycle cost and importantly the impact on player experience.

We are entering a period where there will be choices to make and it's important that data exists to help future AGP owners make the right choice for their pitch.

Until we have a clearer understanding of these alternatives, we believe that the adoption of containment measures is an important and responsible approach to prevent the migration of microplastics.

The Football Foundation has followed European Technical Guidance since 2020, installing containment measures on all its funded pitches.



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We know from studies around Europe that good design can reduce infill loss by 98%.



In partnership with the Football Foundation, Sport England is also undertaking research on the efficacy of containment measures, and we're committed to making the research available as soon as possible.

We acknowledge the difficulty in trying to balance the health and well-being benefits that come from the use of 3G pitches with environmental sustainability factors. However, it is also important to note that there are currently no widely available alternative infill products with proven durability on the market that are as effective, suitable for all UK weather conditions and deliver the required performance standards.

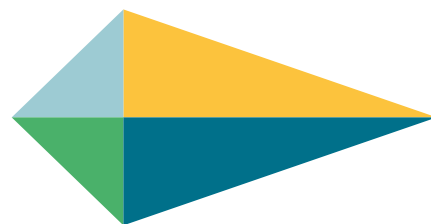
We'll continue to work with partners across the UK and Europe to research and reduce the spread of microplastics into the environment.

More information will be published as discussions progress.

# We are East Suffolk

Our aim is to deliver the highest quality of life possible for everyone who lives in, works in and visits East Suffolk. To help us achieve this, we will use this strategic plan as our compass to guide all our decisions.

Our five key themes show the direction we will take. All themes are interconnected and complement each other.



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