

Hinckley & Bedworth BC

FAO: Joe Fleetwood

By email only

10 February 2026

**Town & Country Planning (Development Management Procedure) (England)
Order 2015**

Application Reference: 25/01233/FUL

Site: Britannia Recreation Ground, Britannia Road, Burbage

Proposal: Creation of a 3G Artificial Grass Pitch (AGP) with perimeter fencing, hardstanding areas, storage container, floodlights, acoustic fence, Huddle unit and overflow, grasscrete parking area

Sport England Reference: PA/25/EM/HIN/72931

Thank you for consulting Sport England on the above application.

Sport England – statutory consultee role and policy

We understand that you have consulted us as a statutory consultee in line with the above Order. Therefore, we have considered the application in light of the National Planning Policy Framework (NPPF), in particular paragraph 104, and Sport England's Playing Fields Policy, which is presented within our 'Playing Fields Policy and Guidance Document': www.sportengland.org/playingfieldspolicy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field land remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.

The proposal and impact on playing field

The proposal would involve the construction of a 3G Artificial Grass Pitch (AGP) to accommodate a football pitch area of 91 x 55m with 3m run-offs (97m x 61m).

Hard standing viewing areas and goal storage areas would be constructed around the pitch along with perimeter barrier fencing and ball stop fencing to a height of 4.5m around the perimeter of the AGP facility.

The pitch would be lit by a 6 x 15m high LED floodlighting system. A maintenance/sports equipment store and 2.5 metre high Huddle Hub tea bar would be sited within the fence pitch enclosure. A 4.5 metre high acoustic barrier would be sited along the northern boundary of the AGP.

A Grasscrete overflow car park would be provided to the east of the proposed AGP and would be lit by 4m high lighting columns. The proposal would involve the relocation of an existing rugby pitch as shown on the Playing Field Layout Plan (Drw No: 09 Rev 00).

The Biodiversity enhancements, as included in the BNG Metric Cover Report (18.7.25), are to be delivered off-site through one of the environment banks. It appears that some areas of land required for the creation of earth bunds to facilitate this proposal would be sited to the north of the AGP and to the east of the car park as shown on the Proposed AGP Plan (Drw No: 04 Rev 00).

Sport England has been involved in pre-application discussions on this proposal. Prior to preparing this planning consultation response Sport England has sought the views of the Football Foundation (FF) and the Rugby Football Union (RFU), on the planning application as they act as Sport England's technical advisors in relation to their sport and its facilities. Their comments are summarised below:

FF

- This is a FF supported project. FF technical colleagues have been involved in the design throughout, have reviewed proposals prior to planning submission and confirm the design is compliant with FF and FA technical guidance.
- World Rugby Regulation 22 compliance was not included in full at the time of submission, as the programme of use was still being developed. However, the World Regulation 22 has been priced, and FF technical colleagues can confirm that the 3G pitch would be a fully Regulation 22-compliant system.
- Whilst proposals have included information on all technical aspects, FF would also expect to see a cross-section of design and construction materials included in plans, clearly showing surface pile length, infill type, sub-base and shock pad construction, fencing height and appearance, and infill retention boards.
- Hinckley and Bosworth undertook a PPS in 2025. The PPS indicates that there is a shortfall of four 11v11 3G pitches with a specific shortfall of two 11v11 3G FTPs in the "Urban South" sub area, which this would project would be located.
- This project is identified in the LFFP as a suitable site for the delivery of an 11v11 3G FTP to deliver opportunities for community football and rugby. This was determined through a feasibility study, which compared the site as an option against a local school and other parish-owned locations.
- Although the Parish has invested in grass pitch improvements, demand now exceeds what natural turf can provide. A 3G FTP will ease pressure on existing facilities and increase playable hours for football and rugby, in line with PPS

recommendations.

- The Burbage Neighbourhood Plan (2021) supports investment in leisure and community sport. The project aligns with Policy 42, which seeks to protect and improve local facilities and promote health, sustainability, and physical activity. It also supports Burbage's growing and ageing population through improved recreation infrastructure.
- Burbage has experienced significant housing growth, with more than 500 new homes either recently completed or in development. This population growth will increase demand for local sports infrastructure, particularly for youth and family use.
- Within the "Urban South" sub area of Hinckley & Bosworth, a FF funded 3G FTP has been refurbished at Hinckley Rugby Football Club (HRFC), which accommodates the training demand from FC Burbage and other FCs locally. The expectation is FC Burbage will migrate their training use to Britannia Road, creating capacity at HRFC to meet some of the other local need and demand outlined in the PPS. There are no concerns with regards to this displacement with all parties engaged.
- BRFC currently has a lease to play on a grass pitch at the application site. Whilst this pitch is not rated by Pitch Power, it is a basic park pitch which has had limited maintenance. This pitch will be replaced by the proposed 3G FTP as part of this project. As a result, BRFC will relocate to a purpose built NTP which was designed to be more level, better drained, and receive enhanced maintenance work. BRFC will have two adult teams that have committed to rotate use on the pitch every week in peak season from September to April. This will be an indirect benefit to BRFC as a result of the 3G FTP.
- Noise Impact Assessment and Sports Lighting Statement satisfies and mitigates potential FF concerns over noise and lighting.
- FF is supportive of this project, would recommend inclusion of a cross-section to be included in plans, and can confirm the pitch's commitment to WRR22 compliance.

RFU

- There is not enough information on pitch construction to demonstrate compliance with the World Rugby Regulation 22 specifications. Page 35 of the Design and Access Statement states the following:
"Importantly, this 3G facility is being designed as a multi-sport venue. Burbage Rugby Club – an active stakeholder in this project – will use the pitch for rugby training, particularly during darker and wetter months when grass surfaces are unplayable. The 3G surface will meet relevant specifications for both football and rugby training use, maximising community value."
- This suggests that the objective is to construct the pitch in accordance with World Rugby Regulation 22 standards. Assuming the pitch is tested and receives World Rugby accreditation, it will satisfy the technical requirements.

However, concerns have been raised regarding the quoted pile height of 40mm, as a minimum of 60mm is required, or at least 50mm in certain circumstances, though this is not advisable. Further analysis is necessary to ensure compliance with World Rugby Regulation 22.

- The Hinckley & Bosworth Playing Pitch Strategy emphasises the following points:
“The grass pitch rugby union shortfalls evidenced are predominately generated by training demand, amounting to a total of 6.75 match-equivalent sessions per week, rather than there being an insufficient level of provision to accommodate match play. As such, the focus of any World Rugby compliant pitches should first and foremost be transferring training activity from match pitches.”
- The proposed provisions aim to alleviate training demand on the single on-site pitch, thereby enhancing its overall quality. Presently, there is no fixed sports lighting solution for rugby training on-site. The rugby pitch is currently illuminated with mobile lights, which diminish the quality and capacity. The installation of a fixed sports lighting system on a World Rugby Regulation 22 compliant pitch, will address all current midweek deficiencies experienced by Burbage RFC.
- The primary requirement for Rugby Union pertains to midweek sports lit provision, rather than the demand for match play. It is crucial to acknowledge that the proposed Artificial Grass Pitch (AGP) is unsuitable for 15-a-side match play rugby activities. However, it may be employed for training purposes, including contact training, or for age-grade match activities. All Rugby Union activities conducted on the AGP must be overseen through comprehensive and regular risk assessments undertaken by a qualified individual, with particular attention to the pitch perimeter, markings, and pitch furniture.
- The relocation of the rugby union pitch will maintain the original dimensions and run-offs in accordance with World Rugby Law 1. Furthermore, this move is expected to improve the playing surface, as the current ground conditions, as highlighted in the PitchPower reports, indicate a superior quality compared to the existing location of the rugby union pitch. We kindly request that, upon completion of the relocation, a certified agronomist conduct a report to verify that the pitch quality meets or exceeds a ‘good’ standard.
- The Noise Impact Assessment concludes that there would be ‘no observed adverse effect’ and the proposals are considered acceptable. This is further supported by a Noise Management Plan; therefore, we have no objections to the noise impact. Additionally, we have no concerns regarding the lighting proposals and are satisfied with the mitigation measures outlined in the Sports Lighting Statement.
- We support the proposals in principle, as they contribute significantly to the improvement of midweek training facilities and the quality of natural turf pitches for Rugby Union. However, there is a concern regarding the stated pile height, and whether compliance with World Rugby Regulation

Assessment against Sport England's Playing Fields Policy and NPPF

The application relates to the construction of an outdoor sports facility which would lead to the loss of an area of playing field at the above site and could prejudice the use of playing pitches and sports courts at the site. The proposal therefore needs to be considered against paragraph 104 (c) of the NPPF (2024) and exception 5 of Sport England's playing fields policy. Exception 5 states that: *'The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.'*

As such, an assessment of the benefits of the new sports facility is required. Whilst Sport England does not wish to discourage new sports facilities, where they result in the loss of grass playing field, it is essential that there are sufficient benefits to the development of sport to outweigh the detriment caused by the loss of the playing field and to ensure that any sport facility does not have a negative impact on another sport facility.

In seeking to balance the potential loss of playing field against the provision of a new outdoor sports facility, Sport England will consider amongst other matters, the following factors:

- The need for the facility – has this been identified in a local sport and recreation strategy, a governing body facility strategy or similar document?
- Technical suitability – does the proposed facility meet the specifications set out in Sport England's Guidance Notes or a relevant National Governing Body of Sport's Guidance Notes?
- Community availability – will the facility be available to the community and if so, will the terms of availability be clearly set out in a community use agreement?
- Sports development – will the facility be linked into the local sports development network?
- Local level of pitch provision – does the local area have a shortfall of playing pitches that would be exacerbated by the current proposal?
- Can replacement playing field be provided on the site and/or existing outdoor sports facilities enhanced to compensate for the loss of the playing field?

Need for the Facility

Hinckley and Bosworth BC have a robust and up-to-date evidence base for playing pitches and outdoor sports facilities to inform decision making as required by Paragraph 103 of the NPPF (2024). The Council adopted its Playing Pitch Strategy (PPS) in 2025. As raised by the FF the PPS indicates that there is a shortfall of four 11v11 3G pitches in the Borough. The PPS goes further to identify specific shortfalls of two 11v11 3G FTPs in the "Urban South" sub area of Hinckley and Bosworth, which the application site is located within.

The FF also refer to the application proposal being identified in the Local Football Facilities Plan (LFFP) as a suitable site for the delivery of an 11v11 3G FTP to deliver opportunities for community football and rugby. This was determined through a feasibility study, which compared the site as an option against a local school and other parish-owned locations.

The Design and Access Statement (Statement) includes details of the key partner club for the 3G pitch which is FC Burbage who have over 35 teams. The Club has a rapidly growing girls' section alongside adult and youth participation. The Club would expand its girls' provision using the new facility. Daytime use by schools is also included in the proposed timetable along with new activities such as walking football, inclusive sessions and workplace wellbeing events.

The sports related benefits of the proposal for the community are outlined in the Statement including increasing the number of people playing in the community. The AGP would support a variety of playing formats. The observations received from the FF confirm that the community engagement findings for the project have outlined a strong community need for this AGP with a strong focus on inclusivity and increasing female participation at the site.

As such the 3G pitch would meet local demand for football within the Urban South analysis area.

As raised by the RFU, the PPS also includes text on the need for a World Rugby compliant 3G pitch for transferring training activity from match pitches. The FF has confirmed that World Rugby Regulation 22 compliance was not included in full at the time of submission of the planning application as the programme of use was still being developed. However, World Regulation 22 has been priced, and FF technical colleagues can confirm that the 3G pitch would be a fully World Regulation 22-compliant system.

Based on the above assessment it is considered that a strategic need for this community sports facility for football and rugby has been identified.

Technical Suitability

The FF has confirmed that the details submitted with the application for the 3G pitch would deliver a 3G FTP compliant with the FA Guide to 3G Football Turf Pitch Design Principles and Layouts with respect to the design of the proposal. Whilst the proposal has included information on all technical aspects, the FF would also expect to see a cross-section of the design and construction materials included in plans, clearly showing surface pile length, infill type, sub-base and shock pad construction, fencing height and appearance, and infill retention boards.

The need to agree and approve a cross-section of the design and construction materials would also address the RFU's concerns that the planning submission

lacks details on how the 3G pitch would be built to WR22 specifications. A planning condition should be imposed on any consent granted requiring the submission of these details prior to work commencing on the sub-base of the 3G pitch hereby approved.

Based on the above, whilst the 3G pitch provision would meet technical specifications, it has not been adequately demonstrated that the pitch would meet technical specifications to meet WR22 specifications. The submission of this detail can form part of a suitably worded condition. Based on this assessment it is considered that the facility would meet technical specifications.

Community Availability

The applicant is prepared to enter into a Community Use Agreement (CUA) to make the facilities available to the wider community. A CUA is required to be submitted as part of a planning condition to ensure that the proposed 3G AGP is used by the community in line with the details outlined in the Statement. This criterion would then be met.

Local Level of Pitch Provision

The proposed AGP would be built on playing field. The siting of the AGP would involve the loss of an adult grass rugby pitch. This rugby pitch would be relocated to another part of the playing field in place of an existing football pitch.

The RFU has confirmed that the relocation of the rugby union pitch would maintain the original dimensions and run-offs in accordance with World Rugby Law 1. Furthermore, this move is expected to improve the playing surface, as the current ground conditions, as highlighted in the PitchPower reports, indicate a superior quality compared to the existing location of the rugby union pitch.

The proposed AGP would result in the loss of a grass football pitch to accommodate the relocation of the displaced rugby pitch. The FF has provided information on the use of this grass pitch by BRFC who currently holds a lease to play on it. BRFC would relocate to the purpose built AGP which would be designed to be more level, better drained, and receive enhanced maintenance work. For the use of the remaining grass football pitch, BRFC have two adult teams that have committed to rotate use on the pitch every week in peak season from September to April.

The proposal to deliver the Biodiversity enhancements, as included in the BNG Metric Cover Report (18.7.25), off-site is welcomed. The proposal appears to use areas of land to the north of the AGP and to the east of the car park as shown on the Proposed AGP Plan (Drw No: 04 Rev 00) for the creation of earth bunds. The positioning of the earth bunds would not have a prejudicial impact on the use of the remaining playing field land at the site.

Based on the above, it is Sport England's opinion that the applicant has demonstrated that the remaining playing field land would be sufficient in size to satisfactorily accommodate the playing pitches and sports provision as shown on the Proposed Pitch Layout plan. This factor has therefore been met.

Replacement Playing Field

The application submission does not include information on any replacement playing field that would be provided.

Summary

Based on the evidence above, it is considered that the proposal would meet exception 5 of Sport England's playing fields policy and Paragraph 104 c) of the NPPF (2024) in that the benefits to sport of this outdoor sports facility would outweigh the loss of playing field.

Conclusion

Given the above assessment, Sport England's has no objection to this application, which is considered to accord with exception 5 in Sport England's playing fields policy and with Paragraph 104 (c) of the NPPF. This assessment is based on the following planning conditions being attached to the decision notice (if the Council is minded to grant approval):

Cross-sectional details required for the 3G AGP Condition:

No development shall commence on site until a cross-sectional drawing containing details of the design and construction materials to be used on the 3G Artificial Grass Pitch (AGP) has been submitted to and approved in writing by the local planning authority after consultation with Sport England. The cross-sectional drawing shall include details of the surface pile length for the carpet, the infill type, sub-base and shock pad construction, fencing height and appearance and the infill retention boards to be used on the scheme. The 3G AGP shall be constructed in full accordance with the approved details.

Reason: *To ensure the development is fit for purpose for rugby and football, sustainable and to accord with the NPPF (2024).*

Informative (artificial grass pitches – football). The applicant is advised that the pitch should be tested in accordance with The FA standard code of rules and be registered on the FA Register for 3G Football Turf Pitches.

Informative (artificial grass pitches – rugby). The applicant is advised that the pitch should be built in accordance with RFU guidance note 7: Artificial Rugby Turf and tested bi-annually by an accredited testing laboratory in order to achieve and maintain World Rugby Regulation 22.

Community Use Agreement Condition:

No development shall commence above the sub-base level of the Artificial Grass Pitch (AGP) hereby approved until a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the local planning authority, and a copy of the completed approved agreement has been provided to the local planning authority. The agreement shall include use of the AGP along with access to car parking and changing rooms and shall include details of pricing policy, hours of use, management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved agreement.

Reason: To secure well managed safe community access to the sport facility to ensure sufficient benefit to the development of sport and to accord with the NPPF (2024).

Informative: More information on Community Use Agreements including a model template is available on Sport England's website:

<https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/community-use-agreements>

If you wish to amend the wording or use another mechanism in lieu of the above conditions please discuss the details with the undersigned. Sport England does not object to amendments to its recommended conditions provided they achieve the same outcome and it is consulted on any amendments.

Please contact me if you wish to discuss the above further.

Yours sincerely,

Sharron Wilkinson, MRPTI
Planning Manager