8th November 2026

Dear Development Management Team

Planning Application 120096 Manchester United Artificial Pitch & Lighting

Thank you for the opportunity to provide commentary on this planning application. We object as this cannot be described as sustainable development and there are several unresolved issues. The proposal's effects on Green Belt openness, landscape, lighting, ecology, biodiversity and drainage are not acceptable. With this in mind, we ask that the council refuses permission. If permission is granted, the necessary mitigation should be secured by precise, enforceable conditions and obligations.

Further information is set out in the paragraphs below:

Green Belt and Landscape impact

The application site is within the Green Belt. The proposal adds eight columns, each **18.3 metres high**, as well as three utility enclosures, in a rural landscape. The applicant relies on existing planting and earth bunds to limit visual effects, but that screening will not be effective in all seasons or from all relevant public viewpoints.

We appreciate that the applicant is seeking greater use of the pitches, but the impact on Green Belt openness (including the cumulative effect with previously permissioned columns, and other approved developments, such as the BESS and the recently approved Carrington Relief Road) must be genuinely minimised, along with the impact on the landscape character of Carrington Moss and the surrounding area. The applicant accepts that the proposal would not contribute to the Mossland landscape aims and it must be noted that earlier approvals of similar columns do not show that adding further columns causes no harm.

Eight columns, each 18.3m high with 4 or 8 luminaires, are substantial vertical structures which will stand above much of the bunds and tree line. Suggesting that the proposal "*strikes an appropriate balance*" is insufficient evidence to meet policy criteria.

If the council considers the development appropriate, the claimed need to maintain a world class facility should not substitute for a properly evidenced case for very special circumstances, consideration of less harmful alternatives or genuinely sustainable development.

Light pollution and other disturbances

The proposed lighting may change how the site and surrounding area (including the adjacent SBI) are experienced after dark. The council should, therefore, require a more comprehensive lighting assessment showing the cumulative impact of all permissioned developments on the intrinsic dark skies in this area. That assessment should consider glare, sky glow and effects on species.

We are concerned that the applicant's intention is to enable greater use of the pitches, but paragraph 6.25 of the Planning and Green Belt Statement suggests "*this would not be to a level which would materially intensify the use of the site and, therefore, would not result in undue noise or disturbance*". The Council should secure more information prior to determining the application to ensure that human and wildlife harms are minimised.

We note there is a welcome acceptance of the expected enforceable planning condition limiting operational hours.

Biodiversity net gain

The Biodiversity Net Gain Assessment records the loss of 1.43 habitat units, a 100% on-site loss, and states that the habitat trading rules are not satisfied. It identifies potential habitat banks (albeit using the same site reference for two of them) but does not demonstrate in the information provided that suitable units are available, secured or allocated to this development.

Given the perimeter of the whole of the Manchester United Training Ground site (which we understand is 44 hectares), it is extremely disappointing that the applicant has ruled out onsite BNG, without giving any reasons. This 2024 article[1] suggests that they "*actively manage the biodiversity of the Carrington Nature Reserve and use it as an educational tool*". The Manchester United reserve could have been identified as a beneficiary for BNG. There is also an adjacent SBI (albeit on the land of a different landowner). The absence of the New Carrington Masterplan means environmental and ecological improvement opportunities in the area are being missed, including those that could support the Nature Recovery Strategy. This means that local communities are suffering increasing harm, with the benefits accruing to other areas.

PfE policy JP-G8 expects the mitigation hierarchy to be followed. The applicant should show that on-site and own-land options were genuinely considered before market units.

There are some discrepancies between the different reports on the portal (floodlight and GRP footprint is given as 2.07 sq m in the PEA, for example, but as 0.0006 ha (6 sq m) in the BNG report). These discrepancies must be checked by the planning officer.

Any off-site gain must be secured and must deliver the required biodiversity gain before development begins, with the relevant management and monitoring arrangements in place.

Ecology

We can see no comments on the portal from the GMEU and would welcome sight of their feedback. We believe the ecological evidence is insufficient. No bat survey has been done (apart from a daytime preliminary roost assessment), for example, despite the Preliminary Ecological Appraisal (PEA) suggesting that the adjacent woodland habitat is likely to support good populations of pipistrelle and *Myotis* bats, and that it will be affected by the lighting. The effect of the development (including the cumulative effect with previously permissioned columns, and other approved developments, such as the BESS and the recently approved Carrington Relief Road) must be genuinely established and mitigated prior to permission being granted, particularly as the anticipated operational use (up to 9pm) overlaps with dusk foraging, when bats are most active.

There is no reference to the adjacent Manchester United reserve (which does contain a pond and is regularly subject to surface water flooding) or the nearby SBIs, particularly Birch Moss Covert.

Information about protected nocturnal species is redacted but we are aware of their substantial presence in the area.

The planning officer should secure further information prior to permission being granted.

[1] https://www.bbc.co.uk/sport/articles/cxe9nzdrm0do

Synthetic surface and drainage

There is currently no feedback from the LLFA on the portal and, whilst the Planning and Green Belt Statement suggests the synthetic pitch will remain permeable and that drainage will not be affected, the planning officer should ensure that those claims are supported by the detailed specification and drainage information, including how runoff will be managed and how the surface will be maintained and replaced. The council should also be satisfied that the design will not increase flood risk and will prevent surface materials, fibres or other pollutants escaping into surrounding land or water courses before determining the application.

With all of the above in mind, we believe the planning officer should defer determination until the applicant has resolved the outstanding issues set out above and should refuse permission if the full evidence does not demonstrate that the proposal's effects on Green Belt openness, landscape, lighting, noise, ecology and drainage are acceptable. If permission is granted, the necessary mitigation should be secured by precise and enforceable conditions and obligations.

Kind regards

Marj Powner

Chair, Friends of Carrington Moss