
Re: 145297/FO/2026 - 404 Wilbraham Road

From Joshua Lee <[REDACTED]>
Date Fri 08/05/2026 12:10
To Melissa Sullivan <[REDACTED]>

Hello,

Thats brilliant - thanks as always.

Josh

Joshua Lee
Assistant Planning Officer
Area Team



Desk 213, Floor 6, Manchester City Council, Growth & Development Directorate,
Planning, Building Control & Licensing, PO Box 532, Town Hall, Manchester, M60 2LA
[REDACTED]

From: Melissa Sullivan <[REDACTED]>
Sent: 08 May 2026 12:03
To: Joshua Lee <[REDACTED]>
Subject: RE: 145297/FO/2026 - 404 Wilbraham Road

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Hi Josh,

Thank you for the updated plan, it appears to address my comments. I am therefore now satisfied with the information provided for this application.

I have summarised my comments below:

- The Reasonable Avoidance Measures (RAMs) for nesting birds and hedgehogs stated in the addendum report should be followed and secured by condition, when habitat removal takes place.
- The bat and bird boxes should be secured by condition and implemented.
- BNG:
 - The proposal is well exceeding 10% net gain on-site, with a gain of 0.09 habitat units (+554.92%) and a gain of 0.02 hedgerow units (+38.46%). Due to the limited habitat creation on-site, a simple landscape management plan (LEMP or similar) can be provided to detail the management of the on-site habitats and the gains can be secured by condition.

A full 30-year Habitat Management and Monitoring Plan (HMMP) is not considered to be required for this application.

- The statutory **Biodiversity Gain Condition** will apply should this planning application receive permission. To discharge the condition, the following is required: Biodiversity Gain Plan (using DEFRA template), final BNG metric (with all relevant information filled in, including the Start tab) and landscape management plan. Please see [Biodiversity net gain - GOV.UK](https://www.gov.uk/guidance/biodiversity-net-gain) for how this should be dealt with on the decision notice.

In summary, GMEU are satisfied that this application can be forwarded for determination and that any permission if granted is supported by the conditions recommended above including the Biodiversity Gain Condition.

If you have any queries about these comments, please let me know.

Kind regards,

Melissa Sullivan
Ecologist

Greater Manchester Ecology Unit
Tameside MBC, Dukinfield Town Hall
King Street, Dukinfield,
Tameside, SK16 4LA



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From: Joshua Lee [REDACTED]
Sent: 06 May 2026 08:11
To: Melissa Sullivan [REDACTED]
Subject: Re: 145297/FO/2026 - 404 Wilbraham Road

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Hello,

Hope this should now resolve the outstanding issues -

The bird boxes were on the plan they were above the lower grd flats bike store and were hidden by background lines on the drawing. These have now been moved and are more conspicuous. Drawn as requested and now more clearly as requested.

The hedge will now only be Yew and is shown as only Yew.

Link to updated plan:

<https://manchestercitycouncil.my.salesforce.com/sfc/p/QH00000G3ISb/a/SI00000HN2tl/Jnpa6yPTlpB0Mnrzw7lkuThjOmQctJMhfBEXGoF2h.k>

With thanks

Josh

Joshua Lee

Assistant Planning Officer

Area Team



Desk 213, Floor 6, Manchester City Council, Growth & Development Directorate,
Planning, Building Control & Licensing, PO Box 532, Town Hall, Manchester, M60 2LA

From: Joshua Lee <[REDACTED]>
Sent: 30 April 2026 06:56
To: Melissa Sullivan [REDACTED]
Subject: Re: 145297/FO/2026 - 404 Wilbraham Road

Hello,

Thanks for this as always,

I will go back to the agent with the feedback.

Josh

Joshua Lee

Assistant Planning Officer

Area Team



Desk 213, Floor 6, Manchester City Council, Growth & Development Directorate,
Planning, Building Control & Licensing, PO Box 532, Town Hall, Manchester, M60 2LA

T [REDACTED]

From: Melissa Sullivan [REDACTED]
Sent: 29 April 2026 15:11
To: Joshua Lee <[REDACTED]>
Subject: FW: 145297/FO/2026 - 404 Wilbraham Road

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Hi Josh,

Thank you for providing the attached updated documents to address my comments dated 17/04/2026 for this application.

I have the below further comments:

- Bat boxes – whilst the southern aspect would be preferred, I am fine to accept one box on the east and one on the west of the building.
- Bird boxes – there now appears to only be one location for the swift boxes. I assume this is because all 4 boxes going to be in one location, but this should be confirmed.
- BNG – the proposed hedgerow has been amended in the Landscape Plan which now says 'Yew or Oval-leaved Privet'. The latter is still not native to England (neither was the previous Portuguese Laurel). As per my previous comment - the Landscape Plan should be amended to include native species in the hedgerow only. If a 'non-native and ornamental hedgerow' is proposed, the proposal will be achieving a loss in hedgerow units and the trading rules aren't satisfied. It's therefore important that native species are used only.

Kind regards,

Melissa Sullivan
Ecologist

Greater Manchester Ecology Unit
Tameside MBC, Dukinfield Town Hall
King Street, Dukinfield,
Tameside, SK16 4LA

Tel: [REDACTED]



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From: Joshua Lee [REDACTED]
Sent: 22 April 2026 09:15
To: Melissa Sullivan <[REDACTED]>
Subject: Re: 145297/FO/2026 - 404 Wilbraham Road

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Hello,

The applicant has updated the plans and submitted a revised addendum report based on your feedback.

I have attached them directly as we are currently moving our back office system so cannot update the case file this week.

Thanks

Josh

Joshua Lee

Assistant Planning Officer
Area Team



Desk 213, Floor 6, Manchester City Council, Growth & Development Directorate,
Planning, Building Control & Licensing, PO Box 532, Town Hall, Manchester, M60 2LA

From: Joshua Lee [REDACTED]
Sent: 17 April 2026 11:22
To: Melissa Sullivan [REDACTED]
Subject: Re: 145297/FO/2026 - 404 Wilbraham Road

Hello,

Thanks for your consult as always,

Josh

Joshua Lee

Assistant Planning Officer
Area Team

Desk 202, Floor 6, Manchester City Council, Growth & Development Directorate,
Planning, Building Control & Licensing, PO Box 532, Town Hall, Manchester, M60 2LA

From: Melissa Sullivan <[REDACTED]>
Sent: 17 April 2026 11:20
To: Joshua Lee <[REDACTED]>
Subject: RE: 145297/FO/2026 - 404 Wilbraham Road

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Hi Josh,

Thank you for the updated documents for this application. I have the following comments:

I am mostly satisfied with the updated information and the Reasonable Avoidance Measures (RAMs) for nesting birds and hedgehogs stated in the addendum report should be followed and secured by condition, when habitat removal takes place.

Bat and Bird Boxes:

There are a few discrepancies and issues with the bat/bird boxes as below, however this can be resolved to discharge the associated condition for biodiversity enhancements, as opposed to prior to determination of this application.

- Bat boxes:
 - We'd recommend that the two proposed bat boxes are moved to a south, south-east or south-west facing aspect, as per best practice guidelines. They are currently on a north and west aspect on the Landscape Plan however they should be subject to some sunlight during the day, and north facing is sub-optimal for bats.
 - The Addendum report states that when ordering the bat boxes, it should be specified that these are to be installed on trees, however the Landscape Plan shows that the boxes are to be placed on the building. The report and landscape plan are therefore contradicting each other.
- Bird boxes:
 - Swift boxes are proposed and on the Landscape Plan and they are noted to be placed at a minimum of 2m. However, best practice advice states that swift boxes should be placed higher than this, e.g. 4-5m or ideally higher, and they should have a clear flight path. We would recommend the box near the northern boundary is moved to the east side of the building to allow for a clear site path and it should be confirmed if boxes at 4-5m high are feasible on the proposed building.

BNG:

- In the BNG metric, a native hedgerow is proposed (0.033km), however the Proposed Landscape Plan states that the proposed hedgerows will be 'Yew or Portuguese Laurel', the latter of which is not native to England. Therefore, the Landscape Plan should be amended to include native species in the hedgerow only. If a 'non-native and ornamental hedgerow' is proposed, the proposal will be achieving a loss in hedgerow units and the trading rules aren't satisfied. _

Provided that a native hedgerow can be implemented and the Landscape Plan updated, I am satisfied with the BNG assessment, and the proposal is well exceeding 10% net gain on-site, with a gain of 0.09 habitat units (+554.92%) and a gain of 0.02 hedgerow units (+38.46%). Due to the limited habitat creation on-site, a simple landscape management plan (LEMP or similar) can be provided to detail the management of the on-site habitats and the gains can be secured by condition. A full 30-year Habitat Management and Monitoring Plan (HMMP) is not considered to be required for this application.

The statutory **Biodiversity Gain Condition** will apply should this planning application receive permission. To discharge the condition, the following is required: Biodiversity Gain Plan (using DEFRA template), final BNG metric (with all relevant information filled in, including the Start tab) and landscape management plan. Please see [Biodiversity net gain - GOV.UK](#) for how this should be dealt with on the decision notice.

If you have queries relating to this advice, please do not hesitate to contact me.

Kind regards,

Melissa Sullivan
Ecologist

Greater Manchester Ecology Unit
Tameside MBC, Dukinfield Town Hall
King Street, Dukinfield,
Tameside, SK16 4LA

Tel: [REDACTED]

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From: Joshua Lee <[REDACTED]>
Sent: 13 April 2026 11:12
To: Melissa Sullivan <[REDACTED]>
Subject: Re: 145297/FO/2026 - 404 Wilbraham Road

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Hello,

Thanks for this as always,

The agent has provided an updated BNG metric and condition assessment, along with an addendum to the original docs to be reviewed. They are on the case file.

Ecology report	13 Apr 2026	ADDENDUM TO ECOLOGICAL CONSTRAINTS & BNG
ASSESSMENT		
Ecology report	13 Apr 2026	BNG CONDITION ASSESSMENT
Ecology report	13 Apr 2026	STATUTORY BNG METRIC

Can you review and provide your feedback?

Thanks

Josh

Joshua Lee
Assistant Planning Officer
Area Team

Desk 202, Floor 6, Manchester City Council, Growth & Development Directorate,
Planning, Building Control & Licensing, PO Box 532, Town Hall, Manchester, M60 2LA
[REDACTED]

From: Melissa Sullivan <[REDACTED]>
Sent: 24 March 2026 11:11
To: Joshua Lee [REDACTED]
Subject: 145297/FO/2026 - 404 Wilbraham Road

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Hi Joshua,

Thank you for consulting GMEU on the application at 404 Wilbraham Road, Manchester.

The application is accompanied by an Ecological Constraints Survey report (April 2025) and a Biodiversity Net Gain Assessment (Feb 2026), authored by Rachel Hacking Ecology. Based on the submitted information, GMEU have the following comments:

Ecological constraints

As per the report, the site could potentially support hedgehog and nesting birds. However, the report fails to make any specific mitigation measures (apart from recommending Reasonable Avoidance Measurements (RAMs) will be sufficient to minimize this risk) however this hasn't actually been provided. Additionally, no enhancement recommendations have been made which is contrary to Section 15 (paragraph 187) of the NPPF 2024 which states that planning policies and decisions should contribute to and enhance the natural and local environment. We'd expect at least some enhancement recommendations to be made such as bat and bird boxes onto the proposed building.

Biodiversity Net Gain (BNG)

The BNG report is effectively an exemption statement, claiming that the proposal would meet the de minimis exemption (less than 25m² of habitat removal / 5m of hedgerow removal) and that the site is all 'Developed land; sealed surface'. Given that the site appears to be full of discarded materials, including old potted plants etc, I understand that it isn't easy to determine and map the habitats accurately, however I would say from the drone photographs and review of aerial imagery and Google Street View (May 2025), that there appears to be a reasonable amount of vegetation present on the site which will be removed to facilitate the development.

The conifer tree is noted to be container grown as opposed to rooted in the ground, however, photograph 2 doesn't really evidence this. The trunk looks fairly significant, and I would be surprised if the tree was still only rooted to a container. Additionally, this tree would still be removed regardless of whether it is rooted or not, which would not meet the de minimis exemption as even one small tree is approximated to be 41m² (as per the BNG tree helper). Whilst I've not extensively searched for this, I'm unaware of any BNG guidance to state that habitats in containers do not need to be considered in a BNG assessment. Also, it is stated that the hedgerow is ivy only, however from Google street view, I can see that there is sycamore present too. Ivy would still be rooted to the ground and the plans show that the full 'hedgerow' will be removed to facilitate the development which would be more than 5m.

Based on the above and in accordance with BNG guidance, I don't believe that this proposal would be exempt from a BNG assessment given that there are trees/hedgerows and potted vegetation present onsite which are to be removed to facilitate the development resulting in the loss of habitat and hedgerow units. Therefore, a BNG assessment is required for this application, prior to determination and the assessment should detail how the applicant will achieve a minimum 10% net gain either on-site or off-site.

Summary

In summary, insufficient information has currently been provided for this application and more information, including a BNG assessment, is required prior to determination.

Kind regards,

Melissa Sullivan
Ecologist

Greater Manchester Ecology Unit
Tameside MBC, Dukinfield Town Hall
King Street, Dukinfield,
Tameside, SK16 4LA



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