

DATE / REF

28/10/2025

22777/1

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Dear Tom,

Planning application Ref. 143678/FO/2025 - Velvet Cutters, Manchester – Daylight & Sunlight

We write in response to the comments received regarding 1 Constance Street dated 13 October 2025 in relation to GIA's daylight and sunlight report of the Proposed Development named Velvet Cutters, located at 10 Little Peter Street, Manchester (143678/FO/2025). This letter is intended to be read in conjunction with GIA's full daylight and sunlight report and appendices dated 29 July 2025 (the original report).

1.0 INTRODUCTION

GIA were instructed by Torsion Homes to provide daylight and sunlight advice in relation to the Proposed Development Velvet Cutters, located at 10 Little Peter Street, Manchester. GIA have undertaken technical analyses in order to understand the potential effects of the Proposed Development upon surrounding residential receptors.

The original report submitted alongside the planning application was based upon a daylight and sunlight assessment of the surrounding residential receptors.

It is understood that objections to the Proposed Development have been raised by the occupants of the property referred to as 1 Constance Street in the original report, in relation to daylight and sunlight effects. We have undertaken a detailed review of the comments provided by the neighbour's representative ('the comments'). The pertinent extracts from the comments are shown in bold in the sections below, followed by GIA's clarification of each point.

2.0 REVIEW OF REPRESENTATIVE COMMENTS

Address of Adjoining Properties

Whilst it is acknowledged that there are multiple interests located within 1 Constance Street, GIA are limited to the information that is publicly accessible at the time of our assessment. As floor-plans of the property are not accessible in the public domain, we have assessed the daylight and sunlight effects to the property in its entirety. Notwithstanding, our original report details the daylight and sunlight effects to the property as a whole, and the division of interests within the property would not alter the outcome of our assessment, or our view of the daylight and sunlight effects identified.

Window Key

Further clarification as to the location of windows within GIA's report has been requested. GIA have provided images below detailing the various numbers for the windows of 1 Constance Street. These correspond to the analysis results found in Appendix 04, submitted alongside our original report:

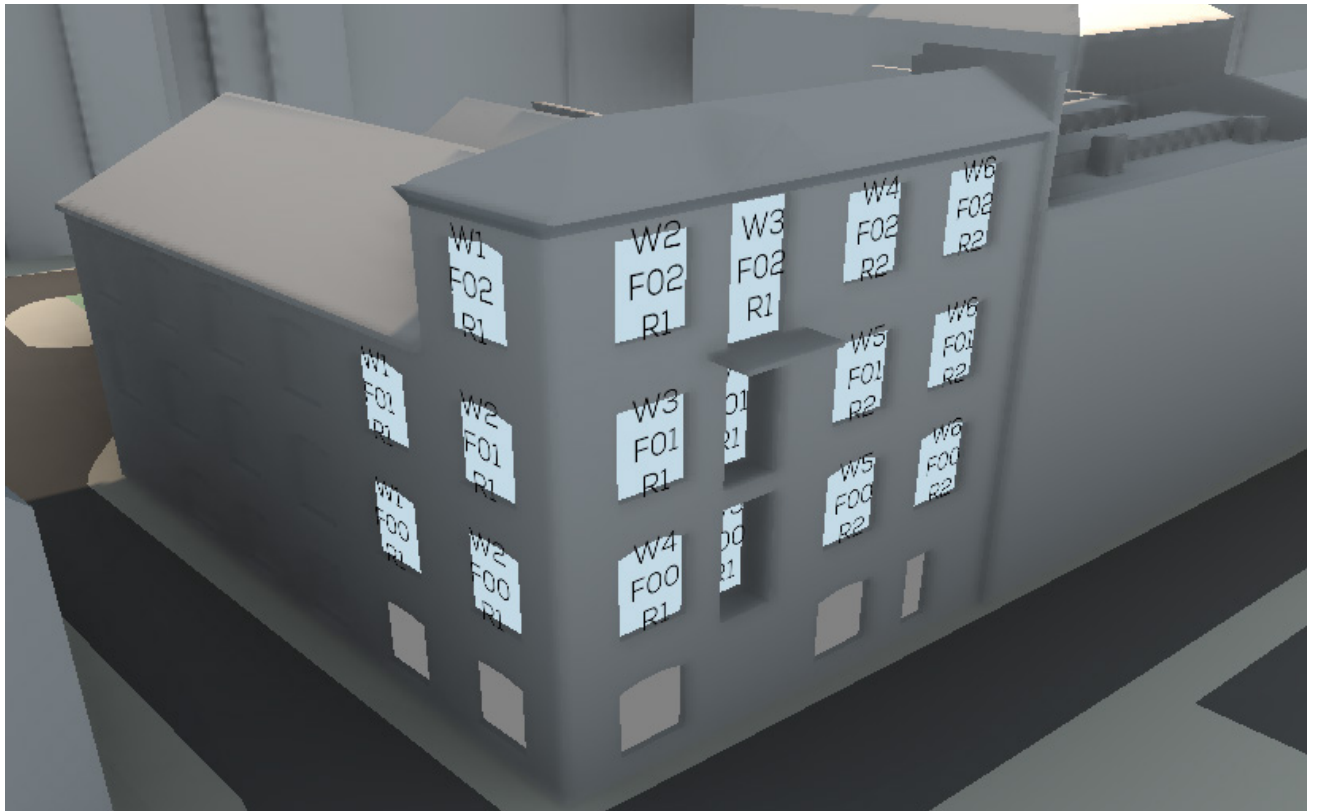


Fig. 01: Window Map for front of 1 Constance Street



Fig. 02: Window Map for rear of 1 Constance Street

No Sky Line tests for Daylight Distribution

The comments express concern that a No Sky Line (NSL) assessment for daylight distribution has not been undertaken. The NSL test measures how much of a room's floor area cannot see the sky due to external obstructions. As the calculation depends on the geometry of the space, including room dimensions and window positions, accurate internal layouts are essential. As noted in 5.5 of GIA's original report, Appendix D of the BRE states that: *"in most cases the position of the no sky line has to be found from plans. The calculation can only be carried out where room layouts are known. Using estimated room layouts is likely to give inaccurate results and is not recommended."*

It is acknowledged that the BRE decision chart (Figure 20 of the BRE Guide) provides the appropriate criteria for assessing daylight and sunlight effects when room layouts are known. However, as no verified room layouts are publicly available for 1 Constance Street, an NSL daylight assessment was not undertaken. As such, the approach within our original report remains consistent with the recommendations of the BRE Guide.

Annual Probable Sunlight Hours Tests

The comments note that an APSH test should be undertaken for the elevation of 1 Constance Street, fronting Constance Street. GIA have undertaken an Annual Probable Sunlight Hours (APSH) assessment for windows deemed suitable for testing, in accordance with the methodology outlined in the BRE Guidelines.

As set out in paragraph 3.2.13 of the BRE Guidelines, *"if a living room of an existing dwelling has a main window facing within 90° of due south, it should be considered for sunlight assessment."* All 12 windows overlooking Constance Street fall outside this 90° criteria, being oriented approximately 94° from due south, as illustrated below. As such, no APSH sunlight test is necessary for the windows fronting Constance Street on account of their orientation.

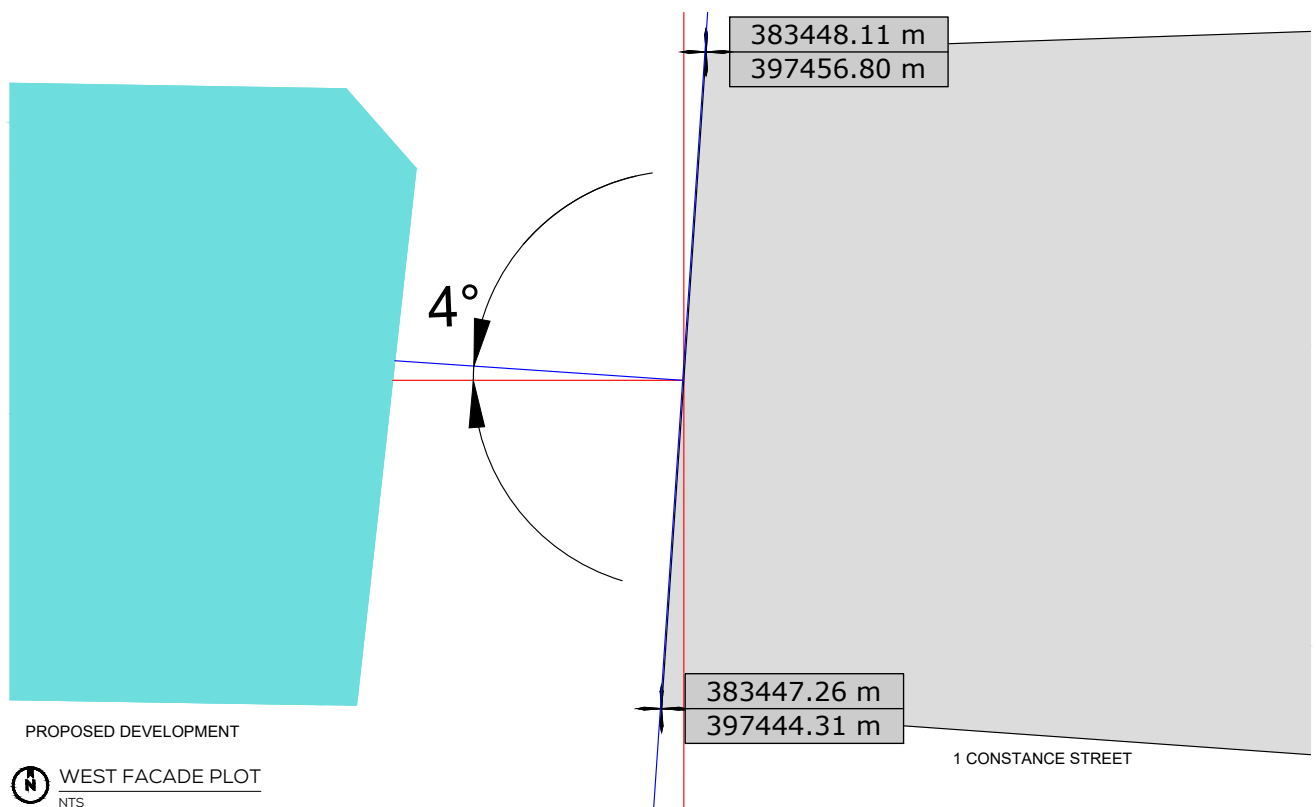


Fig. 03: 90 degree angle from due south test for 1 Constance Street

The APSH test has been undertaken for W5/F02, the location of which is shown in the window map image in Figure 02 above.

Impact on Sunlight to Neighbouring Amenity Spaces

The comments state that no sunlight amenity test has been undertaken for the three adjacent balconies at 1 Constance Street.

Paragraph 3.3.1 of the BRE Guidelines recommends assessing the availability of sunlight for open spaces that are typically used as amenity areas – such as main rear gardens of houses, communal gardens, courtyards, and roof terraces. As such, the juliet balconies and the small third-floor balcony at 1 Constance Street are not considered appropriate for assessment under the BRE criteria.

Furthermore, the amenity spaces are located to the east of the Proposed Development, and so no significant overshadowing effects are anticipated on account of their orientation in relation to the Proposed Development.

Cumulative Impact of Loss

The comments note that reductions in daylight should be considered in a cumulative context when assessing the potential impact of the Proposed Development on 1 Constance Street. It is important to note that any developments which have already received planning consent and are under construction are included within the existing baseline of our assessment. .

At the time of writing our report, the planning application for 1 Commercial Street (application reference 128433/FO/2020). was reviewed, with consideration to the details of the decision notice. The decision notice, dated 5 March 2021, specifies that development must commence within three years of the approval date. As the site continues to operate as a car park, the scheme was excluded from the baseline of our assessment.

Use of Mirror Image Methodology for Setting Baseline Results

The comments note that a mirror image assessment has been used by GIA to justify the results and provide mitigation. GIA's full report compares the daylight and sunlight conditions in the existing and proposed scenarios first and foremost, and it is acknowledged within our report that there would be changes to the retained daylight levels when compared to a development the same height and massing as 1 Constance Street.

As such, the mirror massing assessment was undertaken only as a supplementary comparison assessment to illustrate the effects of a development of identical height to it's immediate neighbours. Such supplementary analyses support a more contextual understanding of the daylight and sunlight results, particularly in relation to the Proposed Development site, which is currently clear. As noted in GIA's full report, the Proposed Development site was never intended to be clear, and has been identified within the Knott Mill Masterplan as suitable for contributing to the city's growing housing needs. The plan considers a proposed building of around 5–7 storeys appropriate for this area, and therefore an alternative baseline is beneficial as a comparative tool to understand the results in context, and comparing the proposed conditions only to those of the currently clear site would fail to consider the relevant context of the site.

The comments also note that 1 Constance Street dates back to around 1850, and so has enjoyed a level of light for many years. This is precisely the reason for further contextual analysis, as historical records show that the Proposed Development site was occupied until around 2008, was never intended to be cleared, and is allocated for further density of development. As such, the use of an alternative baseline provides useful contextual comparison, and serves only to supplement the primary results in GIA's report.

Legal Right to Light

Rights of light is a private legal matter, and therefore separate to planning considerations.

3.0 CONCLUSION

GIA have reviewed the comments and responses are provided in the letter above. We restate the conclusion of our original report, that the Proposed Development is of an appropriate height scale and design, and whilst there would be reductions to the levels of daylight and sunlight currently received by surrounding properties over the cleared site, the resulting levels of daylight would be commensurate with the expectations of the area.

Yours sincerely
For and on behalf of GIA



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Associate Director

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