



Unlocking potential for a better built environment

DAYLIGHT & SUNLIGHT

IMPACT ON NEIGHBOURING PROPERTIES REPORT

Velvet Cutters, Manchester

Torsion Homes

29 July 2025

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1 EXECUTIVE SUMMARY

GIA have assessed the Ollier Smurthwaite Architects' scheme (the "Proposed Development") for Velvet Cutters, Manchester to understand the potential changes in light to the relevant sensitive receptors.

- 1.1 GIA have been instructed by Torsion Homes to provide daylight and sunlight advice in relation to the Proposed Development of Velvet Cutters, Manchester.
- 1.2 GIA have undertaken daylight and sunlight assessments on the adjacent residential properties to understand the potential effect of the proposed development on their amenity.
- 1.3 The technical analysis has been considered by reference to the criteria and methodology within the Building Research Establishment handbook (BR209, 2022) which, when published, recognised that it *"is advisory and the numerical target values within it may be varied to meet the needs of the development and its location."*¹
- 1.4 The approach to be taken to daylight and sunlight issues has been considered carefully by a number of recent appeal decisions from the Inspectorate. A two-stage process is to be adopted. This was examined more recently at the appeal at Goldsworth Road, Woking with the Inspector fully endorsing the two stage approach (PINS Ref: APP/A3655/W/21/3276474) which stems from the High Court decision on the application of Melanie Rainbird and The Council of the London Borough of Tower Hamlets.
- 1.5 With the Proposed Development in place, two of the three neighbouring properties assessed, 1 Constance Street and 357-361 Deansgate, experience changes to their daylight and sunlight levels.
- 1.6 Upon successful completion of the Proposed Development, 48/66 (73%) windows across three properties will fully accord with the published guidelines for VSC daylight. For APSH sunlight, 26/35 (74%) windows will fully accord with the published targets.
- 1.7 It is inevitable when constructing buildings in an urban environment that alterations in daylight and sunlight to surrounding properties can occur. It is well-established and accepted that the BRE Guidelines, which set out the numerical benchmark for daylight and sunlight assessments, are predicated on a relatively low-rise suburban environment. The Planning Practice Guidance (PPG) – Making Effective Use of Land, updated December 2023, Paragraph: 007 Reference ID: 66-007-20190722 states that:
- 1.8 *"All developments should maintain acceptable living standards. What this means in practice, in relation to assessing appropriate levels of sunlight and daylight, will depend to some extent on the context for the development as well as its detailed design. For example, in areas of high-density historic buildings, or city centre locations where tall modern buildings predominate, lower daylight and sunlight levels at some windows may be unavoidable if new developments are to be in keeping with the general form of their surroundings."*
- 1.9 The Proposed Development site is currently a cleared surface car park, and the buildings that previously occupied the site were demolished pursuant to an approved application for a 5 storey office building (086164/FO/2008/C1). As such, the surrounding properties were never intended to receive the levels of daylight and sunlight they currently receive over the existing cleared site, and this places a significant burden on the Proposed Development site to maintain the current levels of daylight and sunlight.
- 1.10 Critically, the Proposed Development is also located within the Knott Mill Masterplan, whereby a 5-7 storey development has been considered appropriate for the site. As such, where appropriate, GIA have undertaken further contextual analyses to better understand any changes in daylight.

¹ Littlefair, P. (2022). Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice. Hertfordshire: HIS BRE Press, p 85 para F1

- 1.11 Overall, having considered the relevant local policies and the Government's recognition for increased flexibility on daylight and sunlight matters, it is our view 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.
- 1.12 This report is supported by several documents, drawings and results which are all enclosed within the Appendices as listed on the Contents Page. All assumptions used in collating this report can be found in Appendix 03.

2 THE SITE

GIA have been instructed to review and advise on the daylight and sunlight impacts associated with the implementation of the Proposed Development known as Velvet Cutters, Manchester.

THE SITE

- 2.1 The site is bound by Little Peter Street to the north, Constance Street to the east, the Commercial Street car park to the south and the Sun House building to the west.
- 2.2 Figure 01 below illustrates the existing site. Further drawings are enclosed at Appendix 03 of this report.

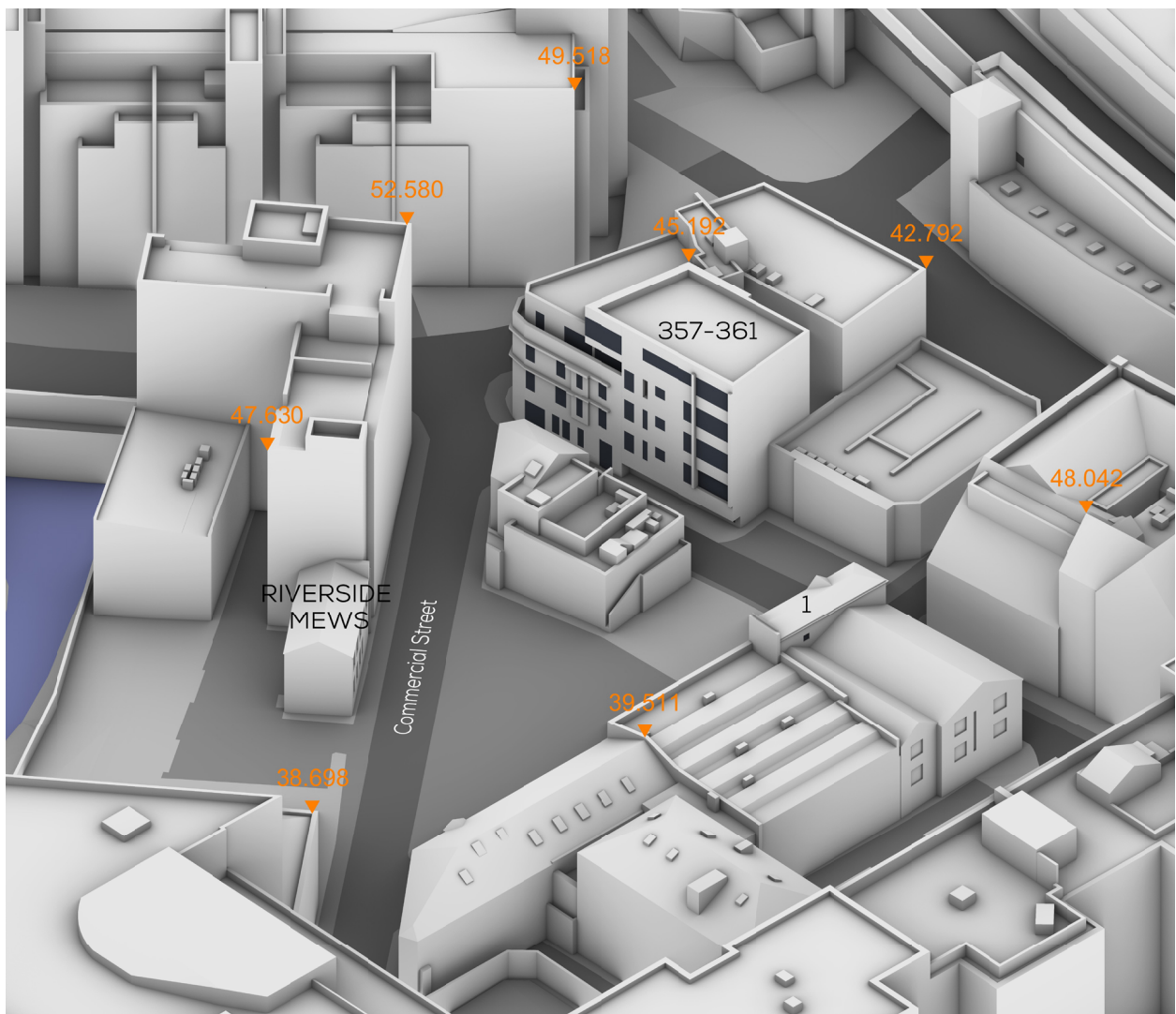


Figure 01: 3D model of the existing site

PROPOSED DEVELOPMENT

- 2.3 Our analysis is based on the Proposed Development massing models produced by Ollier Smurthwaite Architects, issued on 15 July 2025.
- 2.4 GIA's understanding of the Proposed Development is illustrated in Figure 02 and further drawings are enclosed at Appendix 03.

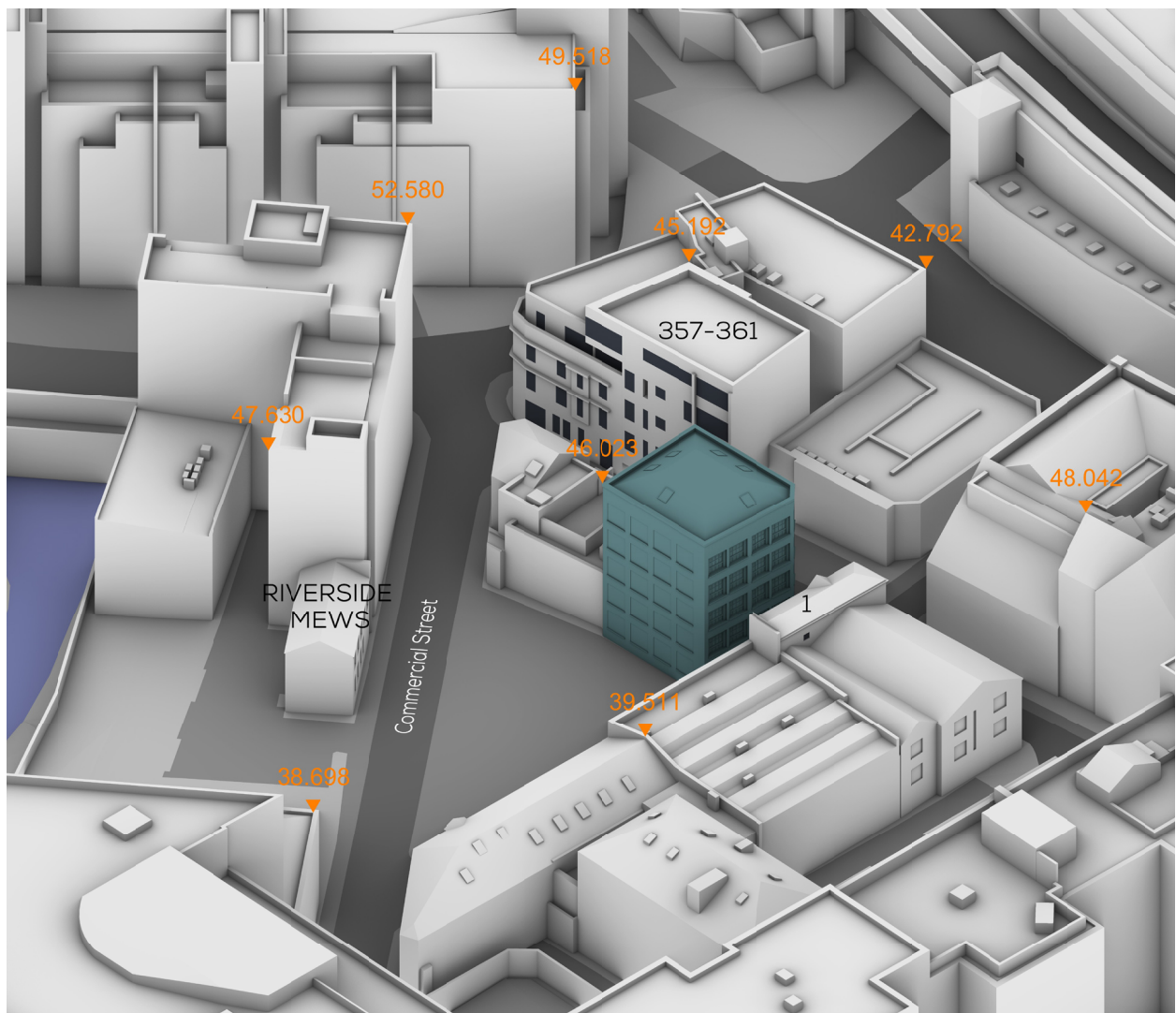


Figure 02: 3D model of the Proposed Development

MIRRORED BASELINE

- 2.5 Where an existing building has windows that are unusually close to the site boundary, such as 1 Constance Street, an approach may be adopted to ensure that a new development matches the height and proportions of existing buildings. This approach involves setting the VSC, daylight distribution and APSH targets for this building to that of a “mirror image” building of the same height and size, an equal distance away on the other side of the site boundary.
- 2.6 Figure 03 below illustrates the mirrored baseline used in our assessment (shown in purple). Further drawings are enclosed at Appendix 03 of this report.

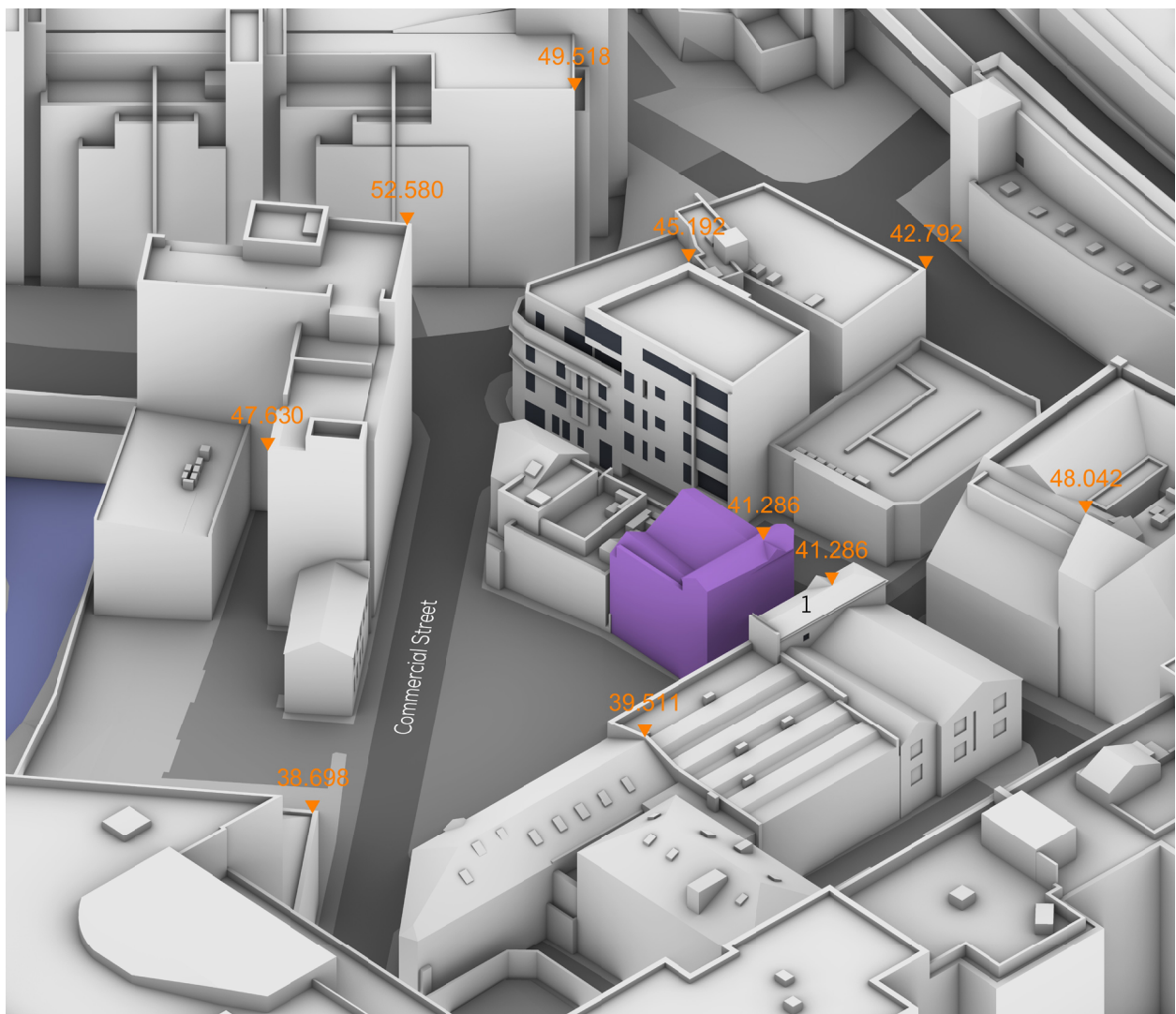


Figure 03: 3D model of the mirrored baseline

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3 POLICY & THE WIDER CONTEXT

3.1 Below we have detailed sections from the following documents as they are, in our opinion, the most pertinent in relation to daylight and sunlight matters and how we have approached the effects of the Proposed Development on the relevant neighbouring properties:

- National Planning Policy Framework (updated 2024); and
- National Planning Practice Guidance (updated 2021).
- Manchester Core Strategy (2012-2027)
- Regional Centre (EC3) and City Centre (CC1-CC10).
- Knott Mill Masterplan (October 2019)

NATIONAL PLANNING POLICY FRAMEWORK (DECEMBER 2024)

The NPPF highlights the Government's recognition that increased flexibility is required on daylight and sunlight in response to the requirement for higher density development by stating that "when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)

NATIONAL PLANNING PRACTICE GUIDANCE (JUNE 2021)

- 3.2 In light of the update to the Government's Planning Practice Guidance, GIA have considered the relevant paragraphs which relate to daylight and sunlight.
- 3.3 Paragraph 6 of the NPPG (Ref ID: 66-006-20190722) acknowledges that new development may cause an impact on daylight and sunlight levels enjoyed by neighbouring occupiers. It requires local authorities to assess whether the impact to neighbouring occupiers would be "unreasonable".
- 3.4 Paragraph 7 (Ref ID: 66-007-20190722) refers to the wider planning considerations in assessing appropriate levels of daylight and sunlight. The test is whether living standards are 'acceptable' and recognises that acceptability will depend to some extent on context.

MANCHESTER CORE STRATEGY (2012-2027)

- 3.5 Policy DM1 – Development Management – States that all developments should have regard to the effects on amenity including privacy, light, noise, vibration, air quality and odours.

REGIONAL CENTRE (EC3) AND CITY CENTRE (CC1-CC10)

- 3.6 Core Policy EC3 (The Regional Centre) states that new housing development should 'complement the development of mixed use employment areas', and will generally be appropriate for 'apartment' and 'higher density residential development'. The mix of housing and density will be informed by 'its location relative to the city centre and public transport facilities (especially the Metrolink).
- 3.7 Core Policies CC1-CC10 (City Centre Development Strategy) specifies the Castlefield area as a priority for residential development, particularly of high density (CC3). Proposals should promote sustainable and mixed communities with a variety of housing options to accommodate different household circumstances (CC3 8.36). Development should also 'provide aesthetic quality and strong references to the City's past.'

KNOTT MILL MASTERPLAN (OCTOBER 2019)

- 3.8 The Knott Mill Masterplan, developed by the Knott Mill Association on behalf of local landowners, was submitted to Manchester City Council in October 2019. The Masterplan aimed to guide future development in this distinctive area, recognising its significant potential to contribute to meeting the growing demand for new homes in the city centre. As a result, the Masterplan was approved in principle, with a key recommendation stating that:

"The buildings should be of an appropriate height, scale and design, in keeping with the identified character assets, and in a different form to the number of tower buildings currently under construction within the city centre."

- 3.9 It is discussed within this strategy that 5-7 storeys is appropriate for the proposed site.

4 BRE GUIDELINES & CONTEXT METHODOLOGY

The Building Research Establishment (BRE) have set out in their handbook 'Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (BR209, 2022)', guidelines and methodology for the measurement and assessment of daylight and sunlight.

BUILDING RESEARCH ESTABLISHMENT GUIDELINES (BR209, 2022)

- 4.1 The BRE Guidelines note that the document is intended to be used in conjunction with the interior daylight recommendations found within the British Standard BS EN 17037 Daylighting in Buildings and the Chartered Institution of Building Services Engineers (CIBSE) LG 10 Daylighting – a guide for designers.
- 4.2 The BRE handbook *"is intended for use in rooms in adjoining dwellings where daylight is required, including living rooms, kitchens, and bedrooms. Windows to bathrooms, toilets, storerooms, circulation areas, and garages need not be analysed. The guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops, and some offices."*
- 4.3 The BRE Guidelines provides two methodologies for daylight assessment of neighbouring properties, namely;
- The Vertical Sky Component (VSC); and
 - The No Sky Line (NSL).
- 4.4 There is one methodology provided by the BRE Guidelines for sunlight assessment, denoted as Annual Probable Sunlight Hours (APSH).
- 4.5 It is an inevitable consequence of the built-up urban environment that daylight and sunlight will be more limited in dense urban areas. It is well acknowledged that in such situations there may be many planning and urban design matters to consider other than daylight and sunlight.
- 4.6 Paragraph 4.5.10 notes that *"numerical values given are purely advisory. Different criteria may be used based on the requirements for solar energy in an area viewed against other site layout constraints. Another important issue is whether the existing solar panels are reasonably sited, at a sensible height and distance from the boundary. A greater loss of solar radiation may be inevitable if panels are mounted close to the ground and near to the site boundary."*¹

4.7 Appendix 02 of this report elaborates on the mechanics of each of the above assessment criteria, explains the appropriateness of their use and the parameters of each specific recommendation.

4.8 The following table provides a summary of the criteria set out within the BRE Guidelines for daylight and sunlight. For daylight and sunlight, the BRE Guidelines outline the approach within the accompanying Appendix I, in terms of assigning criteria to assess the effects:

"Adverse impacts occur when there is a significant decrease in the amount of skylight and sunlight reaching an existing building where it is required...The assessment of impact will depend on a combination of factors, and there is no simple rule of thumb that can be applied."

"Where the loss of skylight or sunlight fully meets the guidelines, the impact is assessed as negligible or minor adverse. Where the loss of light is well within the guidelines, or only a small number of windows or limited area of open space lose light (within the guidelines), a classification of negligible impact is more appropriate. Where the loss of light is only just within the guidelines and a larger number of windows or open space are affected, a minor adverse impact would be more appropriate, especially if there is a particularly strong requirement for daylight and sunlight in the affected building or open space."

"Where the loss of skylight or sunlight does not meet the guidelines in this book, the impact is assessed as minor, moderate or major adverse. Factors tending towards a minor adverse impact include:

- *Only a small number of windows are affected;*
- *The loss of light is only marginally outside the guidelines;*
- *An affected room has other sources of skylight or sunlight; and*
- *The affected building only has a low level of requirement for skylight or sunlight."*

¹ Littlefair, P. (2022). Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice. Hertfordshire: HIS BRE Press, p 29 para 3.3.17

4.9 The classification of major adverse is documented within Paragraph 7 of the BRE Guidelines:

“Factors tending towards a major adverse impact include:

- a large number of windows are affected;*
- the loss of light is substantially outside the guidelines;*
- all the windows in a particular property are affected;*
and
- the affected indoor spaces have a particular strong requirement for skylight or sunlight, e.g. a living room in a dwelling”.*

Beneficial impacts occur when there is a significant increase in the amount of skylight and sunlight reaching an existing building. Beneficial impacts should be worked out on the same principals as adverse impacts.”

4.10 The BRE Guidelines do not provide any Guidance on what constitutes a moderate adverse impact.

4.11 The initial numerical criteria for determining the magnitude of effect is based on percentage alterations, as follows:

Magnitude of Effect	Percentage Alteration
Negligible	0-20%
Minor	20-29.9%
Moderate	30-39.9%
Major	40%+

4.12 When considering the significance of daylight and sunlight effects, professional judgement has been used. Consideration has been given to the proportion of rooms/windows affected, as well as the percentage alterations, absolute changes, retained daylight and sunlight levels and sensitivity of the receptor. This is in addition to any other relevant factors, including mitigating factors such as location and nature of the development, balconies, overhangs or design features which may also affect the determination of assigning the criteria.

5 DAYLIGHT & SUNLIGHT IMPACTS TO NEIGHBOURING PROPERTIES

This section details the daylight and sunlight impacts in relation to the relevant properties neighbouring the Site.

- 5.1 A three-dimensional computer model of the site and surrounding properties was produced based on photogrammetry. Where available we have included floor plans of the relevant properties and this context model has been used to carry out the technical assessments. All relevant assumptions made in producing this model can be found in Appendix 01.

RELEVANT SENSITIVE RECEPTORS

- 5.2 GIA have identified the following properties as relevant for daylight and sunlight assessment:
- 1 Constance Street
 - Riverside Mews
 - 357-361 Deansgate
- 5.3 Riverside Mews will meet the numerical recommendations set out within the BRE Guidelines and is not discussed further.
- 5.4 1 Constance Mews and 357-361 Deansgate are fully discussed in the following sections. All results can be found in Appendix 04.

1 CONSTANCE STREET

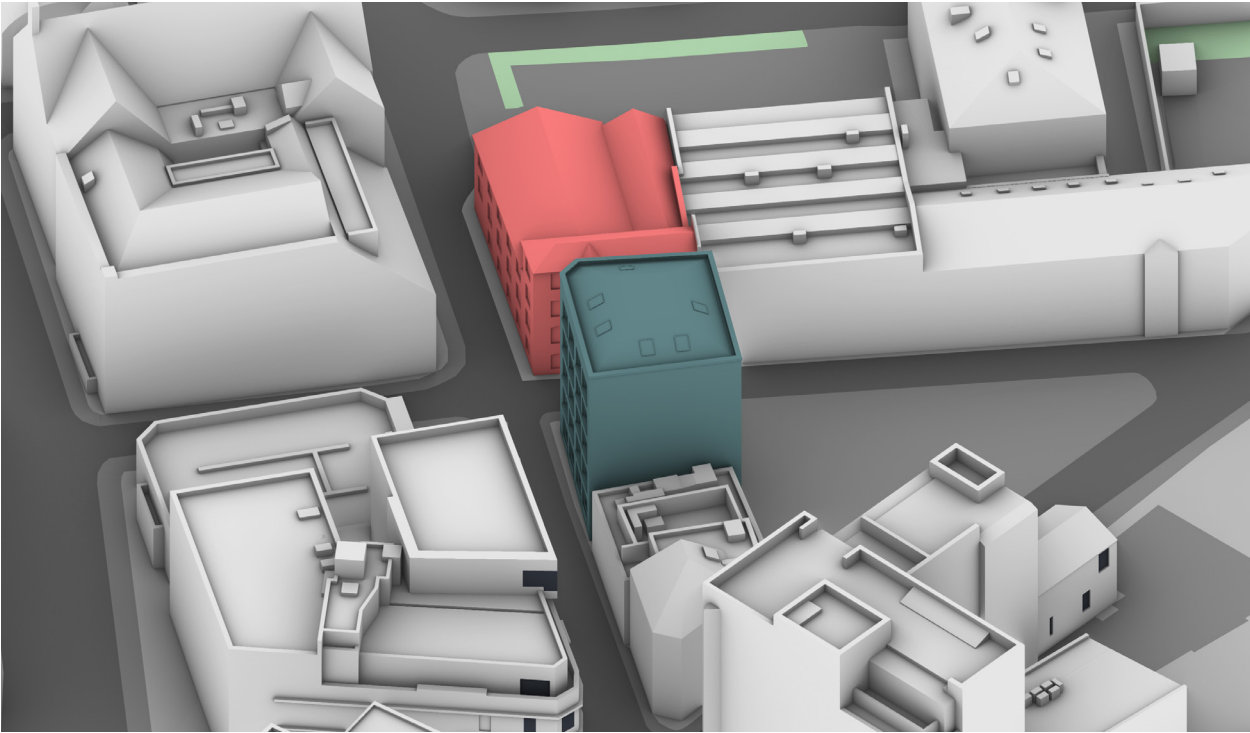


Figure 04: Rendered Image of 1 Constance Street

VERTICAL SKY COMPONENT					VERTICAL SKY COMPONENT				
WINDOW					WINDOW				
TOTAL	PASS	LOSS			TOTAL	PASS	LOSS		
		20-30	30-40	40+			20-30	30-40	40+
18	6	0	1	11	18	7	5	2	4

Table 01 - Existing Baseline - VSC Results - 1 Constance Street

Table 02 - Mirrored Baseline - VSC Results - 1 Constance Street

ANNUAL PROBABLE SUNLIGHT HOURS							
WINDOW							
TOTAL	PASS	ANNUAL (%)			WINTER (%)		
		20-30	30-40	40+	20-30	30-40	40+
1	1	0	0	0	0	0	9

Table 03 - APSH Window Results - 1 Constance Street

Daylight

- 5.5 For NSL, 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.” No room layouts are publicly accessible, and so no NSL daylight assessment has been undertaken.
- 5.6 In order to understand the effects of the Proposed Development on 1 Constance Street, it is important to consider the site within its context. 1 Constance Street is built up to its boundary and is located in close proximity to the Proposed Development site, amking deviations from the numerical criteria innevitable.
- 5.7 The BRE discusses the neighbourliness of surrounding properties, stating that *“another important issue is whether the existing building is itself a good neighbour, standing a reasonable distance from the boundary.”* As such, 1 Constance Street is a poor neighbour in BRE terms, and In situations such as this the BRE recommends a more contextual approach.
- 5.8 This approach involves setting the VSC, daylight distribution and APSH targets for this building to that of a “mirror image” building of the same height and size, an equal distance away on the other side of the site boundary.
- 5.9 Using the mirrored baseline, 7/18 (39%) windows fully accord with the BRE criteria. Of the 11 windows which do not, 5 experience a reduction of 20-30%, 2 experience a reduction between 30-40% and 4 a reduction greater than 40%.
- 5.10 Overall, when compared to a building matching the height and mass of 1 Constance Street itself, whilst there would be greater reductions in VSC daylight, the majority of differences would constitute a minor adverse reduction. Given the constraints of the site, any building of 5-7 storeys would impart similar effects and so the effects of the Proposed Development are considered in keeping with the expectations of development in the area,

Sunlight

- 5.11 Only 1 Window faces within 90 degrees of due south. The window will fully accord with the BRE criteria for APSH sunlight.

357-361 DEANSGATE

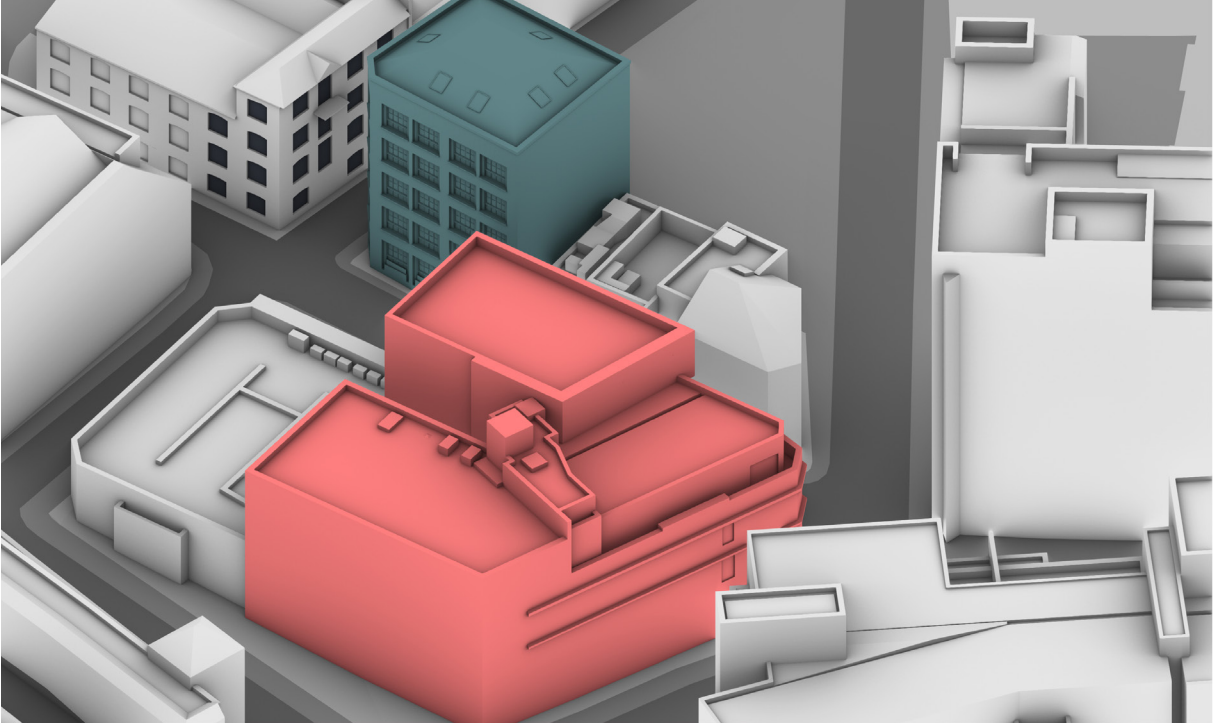


Figure 05: Rendered Image of 357-361 Deansgate

VERTICAL SKY COMPONENT				
WINDOW				
TOTAL	PASS	LOSS		
		20-30	30-40	40+
36	30	3	2	1

Table 04 - VSC Results - 357-361 Deansgate

ANNUAL PROBABLE SUNLIGHT HOURS							
WINDOW							
TOTAL	PASS	ANNUAL (%)			WINTER (%)		
		20-30	30-40	40+	20-30	30-40	40+
31	22	0	0	1	0	0	9

Table 05 - APSH Window Results - 357-361 Deansgate

Daylight

- 5.12 For NSL, 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.” No room layouts are publicly accessible, and so no NSL daylight assessment has been undertaken.
- 5.13 For VSC daylight, 30/36 (83%) windows would fully accord with the recommended numerical criteria. Of the remaining windows, three experience less than a 25% reduction, three experience reductions of between 31–32%, and one window experiences a reduction of more than 40%.
- 5.14 As noted previously, the Proposed Development site is currently a clear surface car park located in an area of significant density. As such, changes in the level of daylight received by the surrounding properties are to be expected.
- 5.15 Notwithstanding, the results of our assessment show that in the context of 357–361 Deansgate, these changes will be isolated in context to the building as a whole, and generally minor in nature.

Sunlight

- 5.16 We have assessed APSH sunlight for windows facing within 90 degrees of due south, and 22/31 (71%) windows assessed would fully accord with the BRE criteria.
- 5.17 Upon reviewing the APSH results in detail, eight of the nine windows which do not meet the criteria fail on account of winter sunlight hours. The significant height of surrounding buildings obscures sunspots in the winter months when solar altitude is at its lowest, making the target of 5% challenging to meet. Notwithstanding, these windows achieve good levels of APSH on an annual basis, and so it is our view that the sunlight received by 357–361 Deansgate can be considered acceptable in the context of urban development.



What we do:

Building Surveying
Daylight & Sunlight
Light Obstruction Notices
Measured Surveys
Party Wall & Neighbourly Matters
Rights of Light
Solar PV
Wind Analysis

Where we are:

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