

By email

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Dear Andrew

RE: PROPOSED DEVELOPMENT OF STOCKTONS, GREAT ANCOATS STREET, MANCHESTER ("the Proposed Development")

GIA are instructed to respond to the further daylight objection from the residents of Oxygen Towers, Store Street, Manchester ("Oxygen") and Urbanbubble Limited, which has been prepared by Akt. Rights to Light Surveyors Ltd ("AKT") and is dated 17 December 2025 ("the Stage 2 DS Review").

This response should be read in conjunction with GIA's 19th September 2025 response to the AKT Stage 1 DS Review dated 16 July 2025, some of which is repeated below for ease of reference.

The author of this response, Nicola Hensey, is a Director at GIA, has a LLB (Hons) degree in Law and has been specialising in daylight and sunlight matters for 18 years. GIA are the largest specialist daylight and sunlight advisor in the UK, with over 30 years of expertise in the discipline. Specifically, GIA have been operating in Manchester for 10 years and have advised on numerous large scale, complex developments in the city in that time.

Summary of the Stage 2 DS Review

The Stage 2 DS Review states that AKT has produced its own model of the site and surrounding context, within which it has run the eight assessment scenarios below to demonstrate the impact of the Proposed Development upon the daylight within Oxygen:

- Existing Baseline vs Proposed
- Mirror Massing Baseline vs Proposed
- Existing Baseline vs Proposed (Plus Emerging Context)
- Mirror Massing Baseline vs Proposed (Plus Emerging Context)
- Existing Baseline vs Proposed (Serving Suggestion 1)
- Existing Baseline vs Proposed (Serving Suggestion 2)
- Existing Baseline vs Proposed Cutback
- Mirror Massing Baseline vs Proposed Cutback

Based on the results of the above assessments, AKT state that their stance on the impact of the Proposed Development on Oxygen has not changed since the Stage 1 DS Review and conclude that:

"It is recommended that the planning committee take heed of this report and reject/defer the application decision until such time the design allows/maintains sufficient light into Oxygen Towers."

What Constitutes Sufficient Light?

Policy DM1 of the Manchester Core Strategy states:

"Development should have regard to the character of the surrounding area".

In other words, when considering acceptability of matters such as daylight and sunlight, the height, proximity and levels of light already established in should be taken into account.

This approach is endorsed by the BRE Guidelines, which state at paragraph 1.6 that the numerical guidelines “should be interpreted flexibly”, whilst the same paragraph goes on to state:

“in a historic city centre, or in an area with modern high-rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings”

Additionally, the National Planning Policy Framework (“NPPF”) states the following at paragraph 130 (c):

“...when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight...(as long as the resulting scheme would provide acceptable living standards).”

The Planning Practice Guidance (“PPG”) also supports this approach, stating:

Paragraph 007 Reference ID: 66-007-20190722

“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 [emphasis added] 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...”

Paragraph: 004 Reference ID: 66-004-20190722

“A range of considerations should be taken into account in establishing appropriate densities on a site or in a particular area. Tools that can assist with this include...characterisation studies [emphasis added] and design strategies, dealing with issues such as urban form, historic character, building typologies, prevailing sunlight and daylight levels [emphasis added], green infrastructure and amenity space...”

GIA have produced a detailed characterisation study as recommended by the Manchester Core Strategy, the NPPF & PPG which reviews whether the amount of visible sky that windows on the northern façade of Oxygen will see (Vertical Sky Component (VSC)) with the Proposed Development in place is comparable with other residential settings in Manchester City with a similar relationship as Oxygen and the Proposed Development.

The VSC assessment has been used to inform the study on the basis that the BRE guidelines state at paragraph F7:

“In assessing the loss of light to an existing building, the VSC is generally recommended as the appropriate parameter to use. This is because the VSC depends only on obstruction, and is therefore a measure of the daylit environment as a whole.”

The characterisation study provides a benchmark as to what is acceptable/sufficient daylight in context and, indeed, what residents living within Manchester city centre, in which a successful residential market operates and where properties are in high demand, experience when exercising choice in where they live.

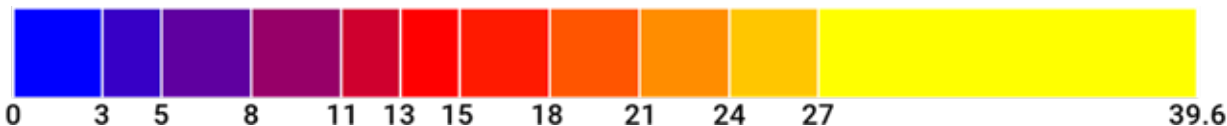
In addition to the Proposed Development, GIA has been involved in the planning applications for the following developments.

- Deansgate South
- Deansgate Square & Great Jackson Street

Detailed analysis models from these have, therefore, been used for the study.

Where GIA has not been involved in the relevant planning applications, a 3D photogrammetric model has been used to indicatively model windows evenly across the façades of the relevant building to enable the same technical assessments to be undertaken as they would in a detailed model.

All of the assessment results have been visualised to show the levels of visible sky (VSC percentage) from the windows based on the below key.



The range of visible sky levels from each window of the relevant façade of each relevant building is then summarised. In order to provide an overall understanding of the amount of visible sky each building can see, an average level of visible sky has been provided.

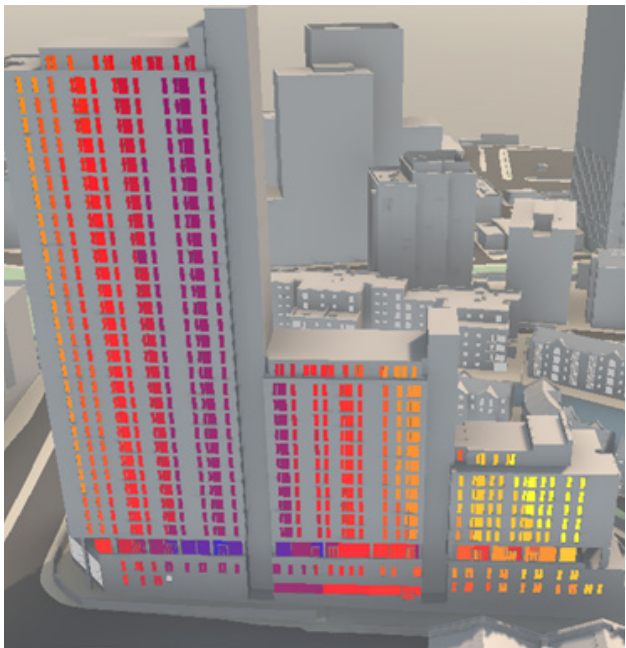
Below is a summary table of those average levels taken from established, successful residential buildings in the city centre, along with retained levels to Oxygen Towers with the Proposed Development in place.

Address	Average level of visible sky from the development facing elevation	Min VSC level
Deansgate Quay*	3.0%	0%
The Astley*	5.5%	1.4%
Hill Quays*	6.2%	0%
Millbank Street Apartments*	6.3%	5.6%
53-55 Great Ancoats Street*	9.1%	2.1%
12 Thomas Street*	10.2%	1.5%
Carding Building	13.4%	4.2%
The Birchin*	14.2%	3.2%
Jefferson Place*	15.3%	4.3%
Vox Apartments	15.6%	2.5%
Oxygen Towers (with the Proposed Development in situ)*	15.9%	3%
Linter Building	18.2%	2.8%

The above table shows a number of successful residential buildings that are recognised as positive urban environments that people choose to live in, thus giving practical, recognisable examples of living conditions in the city centre. A number of these locations receive VSC levels which fall below those anticipated by the BRE, but they are contextually appropriate for the city. It should also be noted that in the cases with an *, the resultant VSC levels reflect the impact of a development on an existing residential building, as distinct from levels which reflect an ‘internal’ impact (i.e. where one or more proposed block affects another one or more proposed blocks within the same development).

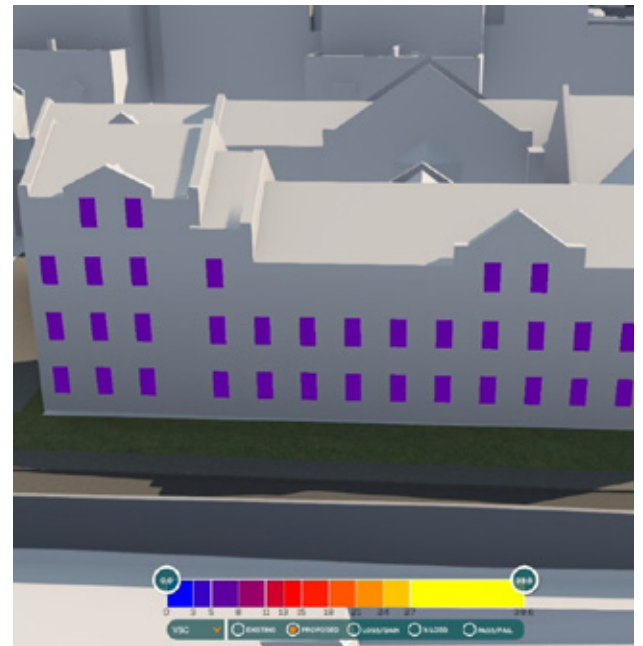
This table shows that the retained levels to Oxygen Towers will therefore be entirely in keeping/sufficient with expectations for daylight in the city centre.

Oxygen Towers – between 18.5m and 22.9m from the Proposed Development



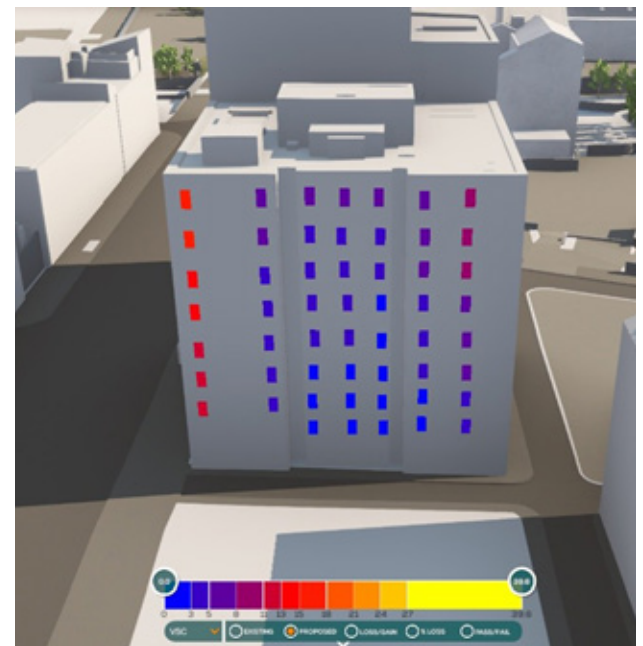
Sky visibility levels range between 3.0% and 39.6%
The average amount of visible sky for the building is 15.9%

Millbank Street Apartments – 19.5m from Oxygen Towers



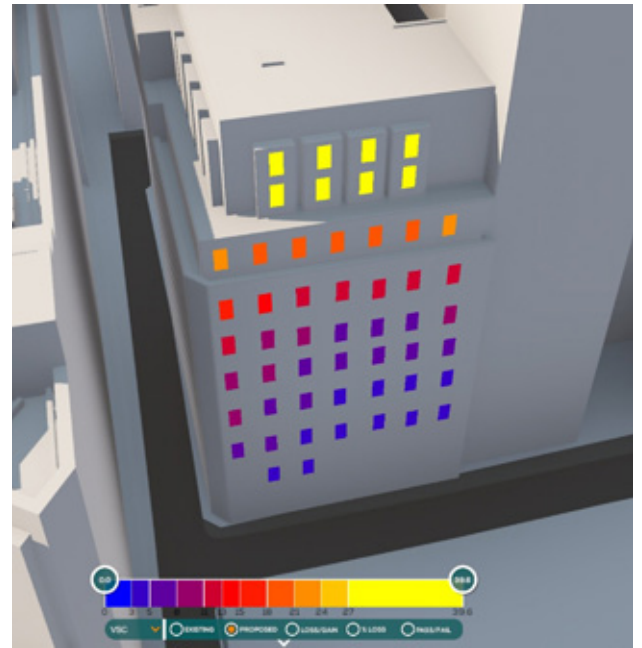
Sky visibility levels range between 5.6% and 7.4%
The average amount of visible sky for the building is 6.3%

The Astley – 5.6m from Oxid



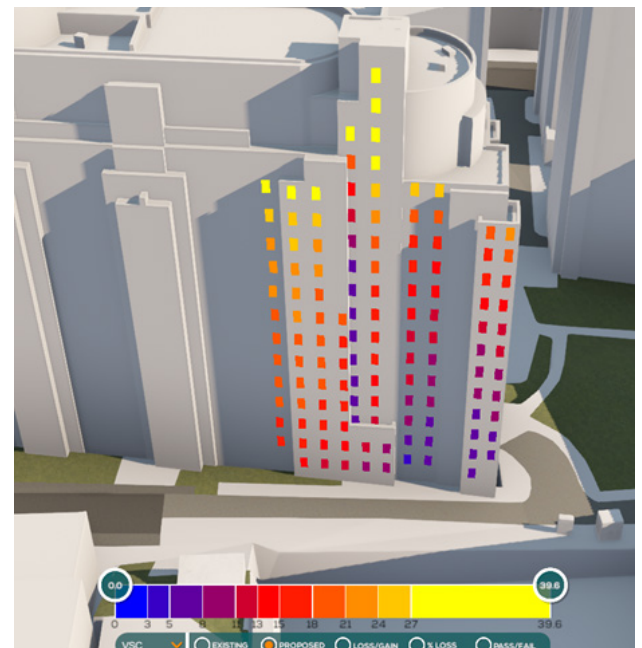
Sky visibility levels range between 1.4% and 16.5%
The average amount of visible sky for the building is 5.5%

The Birchin – 6.9m from Transmission House



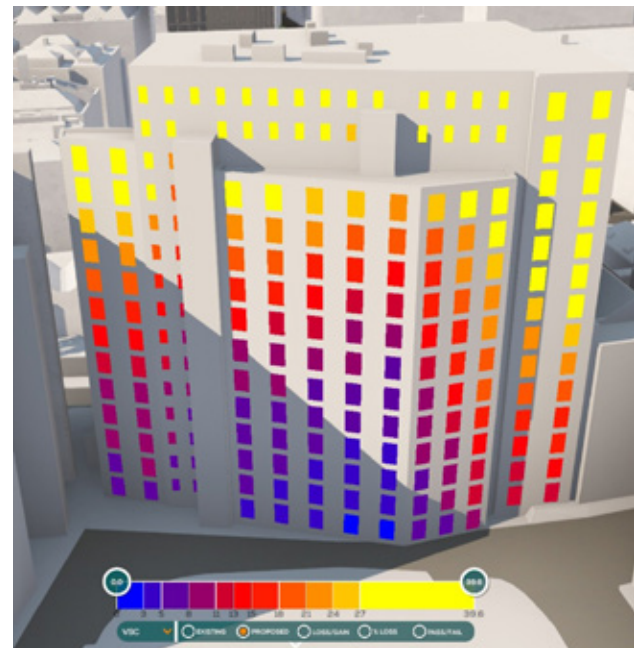
Sky visibility levels range between 3.2% and 33.1%
The average amount of visible sky for the building is 14.2%

Jefferson Place – 10.3m from Hallmark



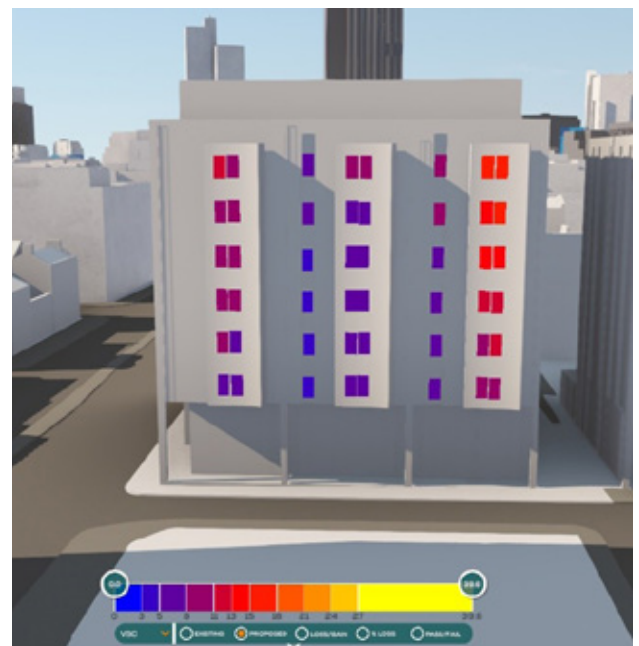
Sky visibility levels range between 4.3% and 36.3%
The average amount of visible sky for the building is 15.3%

Linter Building (Manchester New Square) – 15.9m from Carding Building



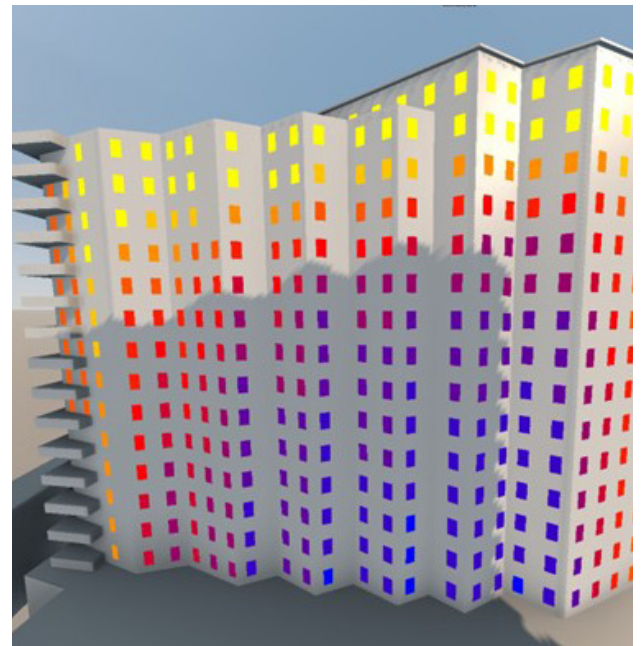
Sky visibility levels range between 2.8% and 39.4%
The average amount of visible sky for the building is 18.2%

53-55 Great Ancoats Street – 12.3m from Nuovo



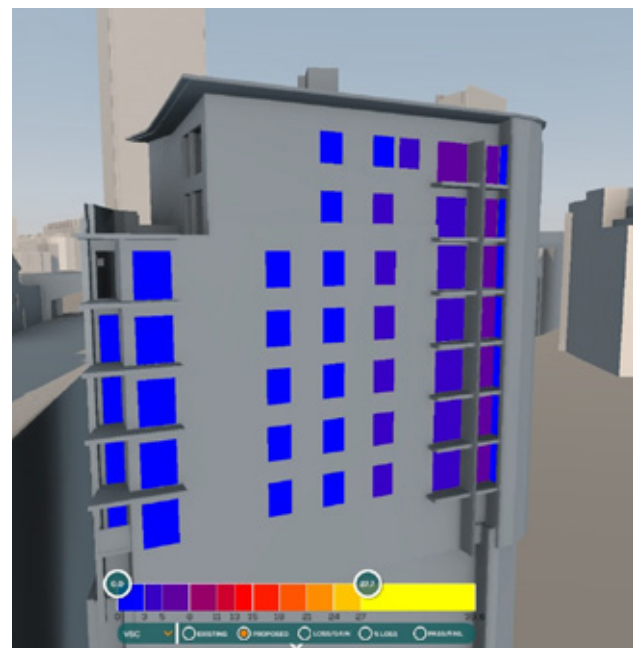
Sky visibility levels range between 2.1% and 16.1%
The average amount of visible sky for the building is 9.1%

Vox Apartments – 5m to 14m Apart



Sky visibility levels range between 2.5% and 39.3%
The average amount of visible sky for the building is 15.6%

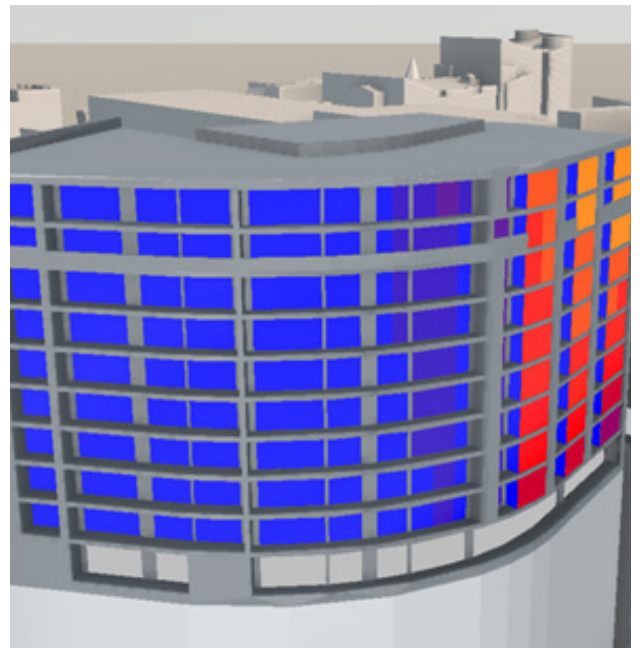
Deansgate Quay – 8.9m from Deansgate South



Sky visibility levels range between 0% and 10.1%
The average amount of visible sky for the building is 3.0%

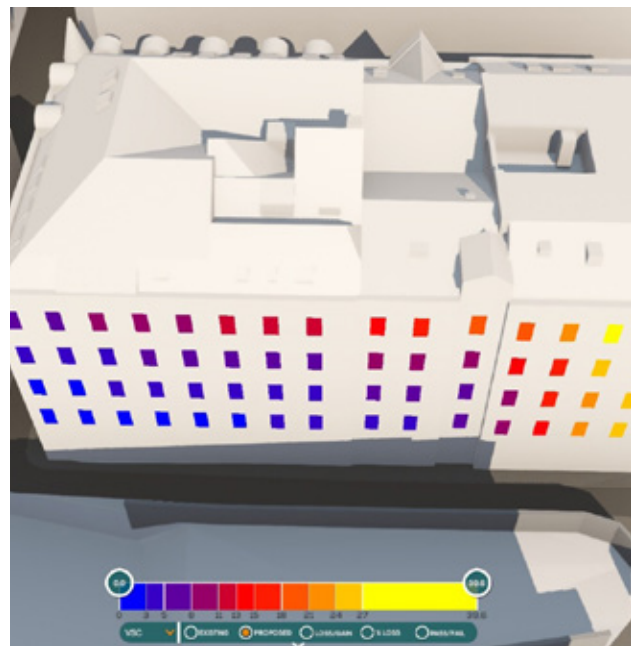
Consent for Deansgate South was granted on appeal (APP/B4215/W/21/3287525) with the inspector saying the following:
"The proposed development would result in reduced levels of daylight and sunlight in living rooms in flats in Deansgate Quay. But daylight and sunlight levels would be reduced by any realistic development on the appeal site and, on the basis of evidence provided at the Inquiry, to the same degree. Consequently, given also that CS policy CC6 emphasises the importance of maximising development opportunities in the city centre, reduced levels of daylight and sunlight in living rooms in Deansgate Quay would not be unacceptable."

Hill Quays – 22.5m from Deansgate Square & Great Jackson Street



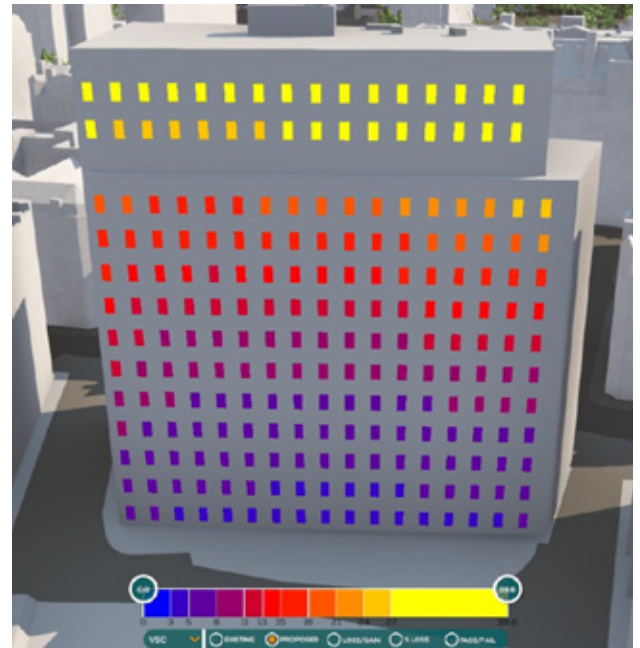
Sky visibility levels range between 0% and 33.8%
The average amount of visible sky for the building is 6.2%

12 Thomas Street – 4.8m from Glassworks



Sky visibility levels range between 1.5% and 32.0%
The average amount of visible sky for the building is 10.2%

Carding Building (Manchester New Square) - 15.9m from Linter Building



Sky visibility levels range between 4.2% and 35.5%
The average amount of visible sky for the building is 13.4%

The study clearly demonstrates that there are a number of successful residential buildings in Manchester with daylight levels that fall below those anticipated by the BRE in spite of which, they are recognised as positive urban environments that people choose to live in, and the levels of daylight are therefore contextually appropriate (sufficient) for the city environment.

Oxygen will evidentially maintain a level of daylight which is entirely in keeping with, and sufficient for, expectations in the city centre,

The AKT Assessments

GIA has not been provided with AKT's technical analysis model and, therefore, to comment on the accuracy of the analysis provided by AKT, we have only been able to compare the data and drawings provided with those produced from the assessments undertaken in GIA's technical analysis model.

General points of note:

AKT have, in each of their assessment scenarios, calculated the effect of the Proposed Development on Oxygen on the basis that the recently consented Former Central Retail Park buildings are already constructed. This is not the case. The AKT assessments will, therefore, differ from GIA's as a result of this additional massing.

AKT have assessed the effect of the Proposed Development upon the non-residential lobby and office space on the ground floor. We have, therefore, discounted these areas for the purpose of our comparison as these areas were not assessed by GIA in accordance with BRE guidelines.

AKT have assessed 900 residential windows. GIA have assessed 858. The reason for the difference is that AKT have assessed some mitigating windows which do not face the Proposed Development, and also because some windows have been assessed as individual panes of glazing by one consultant and as a single glazing pane by the other.

Retained Daylight with the Proposed Development in Place

Retained VSC levels from AKT assessment - 0.33% to 39.03% - Average (for context) 15.7%

Retained VSC levels from GIA assessment - 3.0% to 39.6% - Average (for context) 15.9%

The windows in the AKT assessment which are below 3% are located on the third floor under a deep overhang and face away from the site. AKT have modelled each individual pane of glass serving these rooms, whilst GIA have assessed the windows as one window on the basis the entire opening is there to allow light into the same space. The differing approaches alter where the assessment point is for VSC. The AKT assessment point is at the centre of every window pane and there are more windows in their assessment as a result, whilst the GIA assessment point is at the centre of the entire glazed opening.

For example, the third floor room with the glazing pane which receives 0.33% in the AKT assessment is pictured below. In this instance, AKT have considered each glazed pane as a separate window, whilst GIA have considered the opening as a whole, meaning there will be differences between the reported figures.



The specific pane which receives 0.33% is located on the corner facing away from the Proposed Development and directly towards a structural column. It receives 0.33% VSC both with and without the development in place, so it is unaffected by the Proposed Development and only receives such low levels because it faces that column.

GIA have considered this pane to form part of the entire glazed opening, so the separate VSC figure has not been reported on, but the window opening as a whole has. In any event, this pane is unaffected by the Proposed Development.

Overall, it is clear that there is very little difference between the analysis results produced by GIA & AKT, and GIA's characterisation study shows that Oxygen will evidentially maintain a level of daylight which is entirely in keeping with expectations (sufficient) for daylight in the city centre.

Retained Daylight with the Proposed Development and Emerging Context in Place

GIA has not undertaken this assessment as it was not a requirement to do so under EIA regulations. This is because neither of the areas of emerging context included in AKT's assessments currently benefit from a planning consent.

On this basis the retained daylight levels of this assessment should be ignored as any additional effect upon Oxygen from any emerging context will be considered as part of any future planning applications for the sites/ areas in question.

Cutbacks to the Proposed Development to Improve the Levels of Retained Daylight in Oxygen

GIA has not undertaken this assessment as our characterisation study shows that Oxygen will evidentially maintain a level of daylight which is entirely in keeping with expectations (sufficient) for daylight in the city centre.

Retained Daylight with Alternate Configurations of the Proposed Development

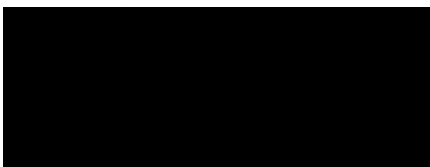
GIA has not undertaken this assessment as our characterisation study shows that Oxygen will evidentially maintain a level of daylight which is entirely in keeping with expectations (sufficient) for daylight in the city centre

Overall Conclusion

GIA and the Applicant fully acknowledge the points raised in the Stage 2 DS Review prepared by AKT on behalf the residents of Oxygen and Urbanbubble Limited.

The GIA and AKT technical analysis broadly aligns. The GIA characterisation study confirms that the levels of daylight being proposed are characteristic of Manchester city centre, and retained daylight levels to Oxygen are therefore considered to be sufficient and commensurate with the character of the area.

Yours sincerely



Nicola Hensey

Director

For and on behalf of GIA Surveyors Ltd