



Unlocking potential for a better built environment

DAYLIGHT & SUNLIGHT

IMPACT ON NEIGHBOURING PROPERTIES REPORT

St Michael's Place, Huyton

Genr8 Kajima

30 July 2026

GIA No: **22348** Fee Quote: FQ0015192

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1 EXECUTIVE SUMMARY

GIA have assessed the Proposed Development for St Michael's Place, Huyton to understand the potential changes in light to the relevant sensitive receptors.

- 1.1 GIA have been instructed by Genr8 Kajima to provide daylight and sunlight advice in relation to the Proposed Development for St Michael's Place, Huyton.
- 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."
- 1.4 Our assessment of the Proposed Development is based upon the detailed model for the Council HQ, and maximum parameters model for the wider site. Further detailed assessment of the outline elements will be undertaken at reserved matters stage as required.
- 1.5 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.
- 1.6 Upon successful completion of the Proposed Development, for Vertical Sky Component ("VSC"), 66/80 (83%) windows across eight properties will fully accord with the BRE recommendations.
- 1.7 For No Sky Line ("NSL") 45/47 (96%) rooms and for Annual Probable Sunlight Hours ("APSH") sunlight, all rooms will fully accord with the BRE recommendations.
- 1.8 Overall, the majority of windows and rooms assessed would not experience any noticeable reductions in daylight or sunlight, and where noticeable reductions do occur, they are generally minor in BRE terms.
- 1.9 There are some larger changes in the levels of daylight received by the properties at 12-18 Archway Road, and given that the area of the site adjacent to these properties is currently a clear, surface car park, changes to the existing light levels are to be expected if the site is to be developed. Notwithstanding, the properties at 12-18 Archway Road will still retain levels of daylight that are contextually appropriate for an urban environment.
- 1.10 In summary, it is our view that the Proposed Development would not impart unacceptable impacts that affect the amenity and living conditions of surrounding neighbours.
- 1.11 Table O1 presents the VSC daylight, NSL daylight and APSH sunlight results for all assessed properties. The adjacent map in Figure O1 shows the location of each property.

Map Number	Name/Address of Building	Percentage of Windows Compliant for VSC Daylight	Percentage of Rooms Compliant for NSL Daylight	Percentage of Rooms Compliant for APSH Sunlight
1	12-18 Archway Road	16/25 (64%)	14/16 (88%)	6/6 (100%)
2	Brookfield House	22/22 (100%)	18/18 (100%)	9/9 (100%)
3	6 Archway Road	9/9 (100%)	7/7 (100%)	3/3 (100%)
4	1 Rupert Road	8/11 (73%)	3/3 (100%)	1/1 (100%)
5	24 Archway Road	11/13 (85%)	3/3 (100%)	1/1 (100%)
	Total	66/80 (83%)	45/47 (96%)	20/20 (100%)

Table 01 - Daylight & Sunlight Levels

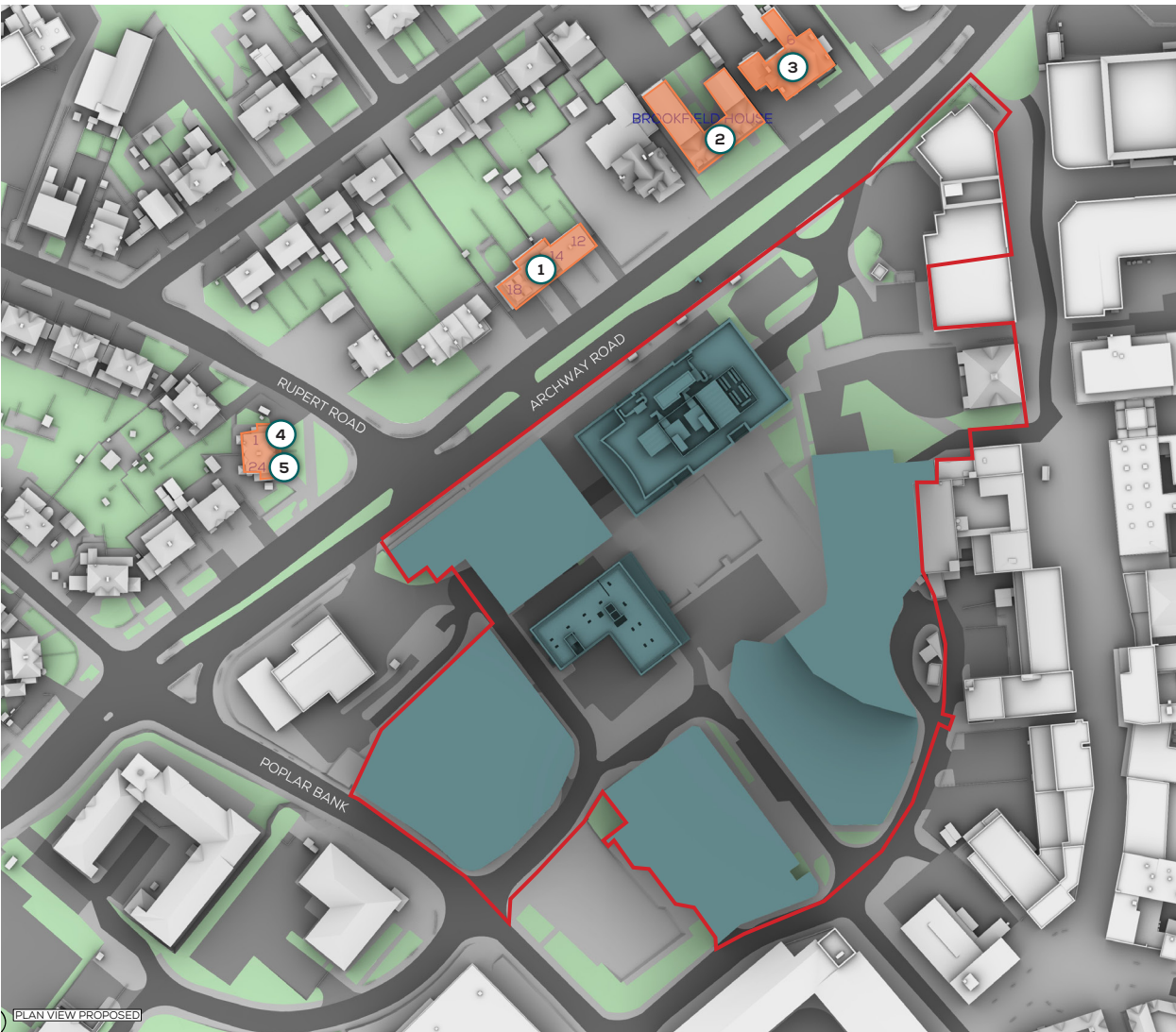


Figure 01: Address Map of Surrounding Properties

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 St Michael's Place, Huyton.

THE SITE

- 2.1 The site is bound by Archway Road to north, existing commercial properties to the east and south, and Poplar Bank to the west.
- 2.2 Figure 02 below illustrates the existing site. Further drawings are enclosed at Appendix 03 of this report.

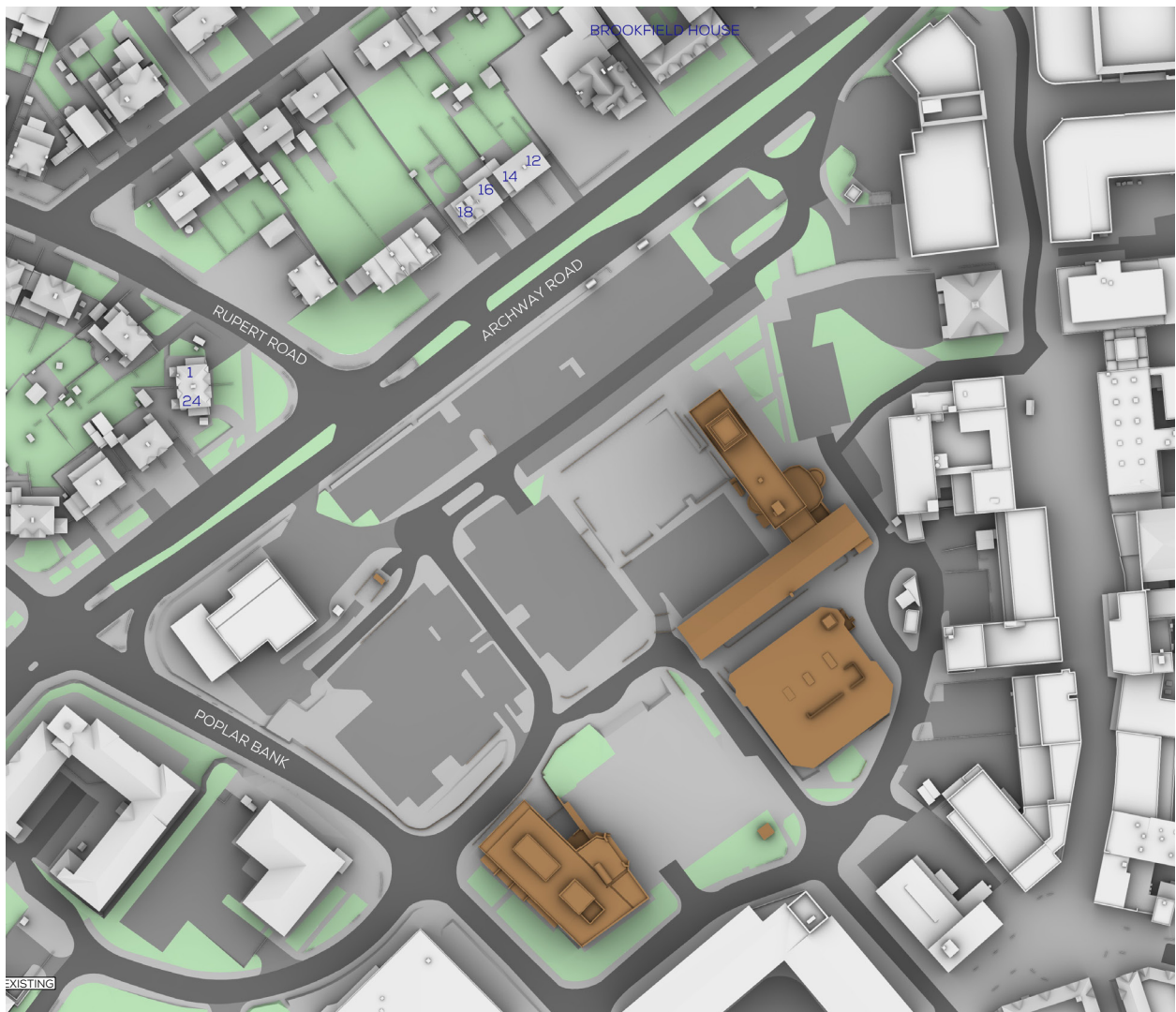


Figure 02: 3D model of the existing site

PROPOSED DEVELOPMENT

- 2.3 Our analysis is based on the Proposed Development massing models produced by Lucid Studio, issued on 27 July 2026.
- 2.4 GIA's understanding of the Proposed Development is illustrated in Figure 03 and further drawings are enclosed at Appendix 03.



Figure 03: 3D Perspective View of the Maximum Parameter Proposed Development

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 (2024); and
- National Planning Practice Guidance (updated ` 2021).
- Knowsley Local Plan Core Strategy (2016)

NATIONAL PLANNING POLICY FRAMEWORK (DECEMBER 2024)

3.2 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)

3.3 In light of the update to the Government's Planning Practice Guidance, GIA have considered the relevant paragraphs which relate to daylight and sunlight.

3.4 In light of the update to the Government's Planning Practice Guidance, GIA have considered the relevant paragraphs which relate to daylight and sunlight.

3.5 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".

3.6 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.

KNOWSLEY LOCAL PLAN CORE STRATEGY(JANUARY 2016)

3.7 Aligning with principles of national planning policy, Paragraph 9.6, Protecting Local Amenity, in Knowsley Council's Core Strategy states that *"the design of new development should avoid unacceptable impacts that affect the amenity and living conditions of building occupants. Such effects can include light."*

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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.

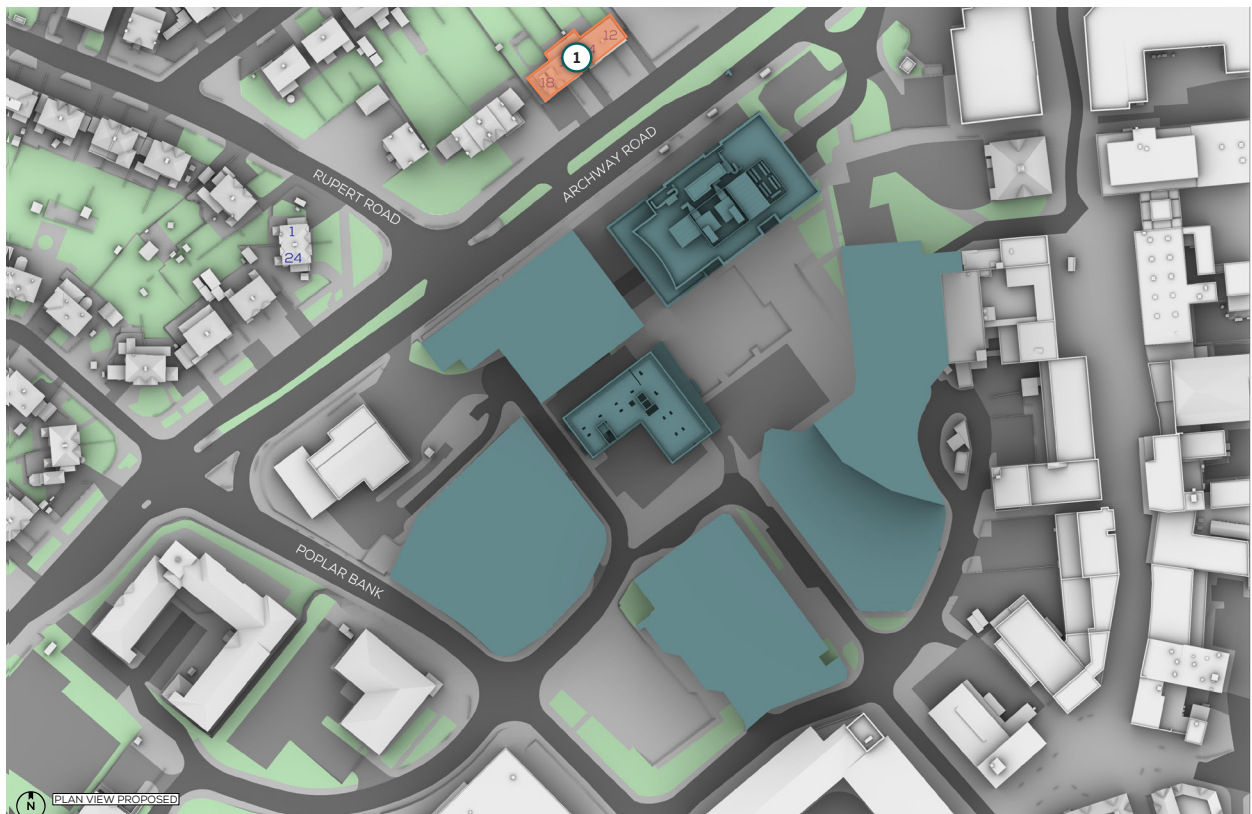
- 5.1 A three-dimensional computer model of the site and surrounding properties was produced based on photogrammetry. Where available we have included floor plans of the relevant properties and this context model has been used to carry out the technical assessments. All relevant assumptions made in producing 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:
- 12-18 Archway Road
 - Brookfield House
 - 6 Archway Road
 - 1 Rupert Road
 - 24 Archway Road
- 5.3 The following properties meet the numerical recommendations set out within the BRE Guidelines and are not discussed further:
- Brookfield House
 - 6 Archway Road
- 5.4 The remaining properties are fully discussed in the following section. All results can be found in Appendix 04.

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12-18 ARCHWAY ROAD



VERTICAL SKY COMPONENT					NO SKY LINE				
WINDOW					ROOM				
TOTAL	PASS	LOSS			TOTAL	PASS	LOSS		
		20-30	30-40	40+			20-30	30-40	40+
25	16	7	2	0	16	14	1	1	0

Table 02 - VSC Results - 12-18 Archway Road

Table 03 - NSL Results - 12-18 Archway Road

ANNUAL PROBABLE SUNLIGHT HOURS							
ROOM							
TOTAL	PASS	ANNUAL (%)			WINTER (%)		
		20-30	30-40	40+	20-30	30-40	40+
6	6	0	0	0	0	0	0

Table 04 - APSH Results - 12-18 Archway Road

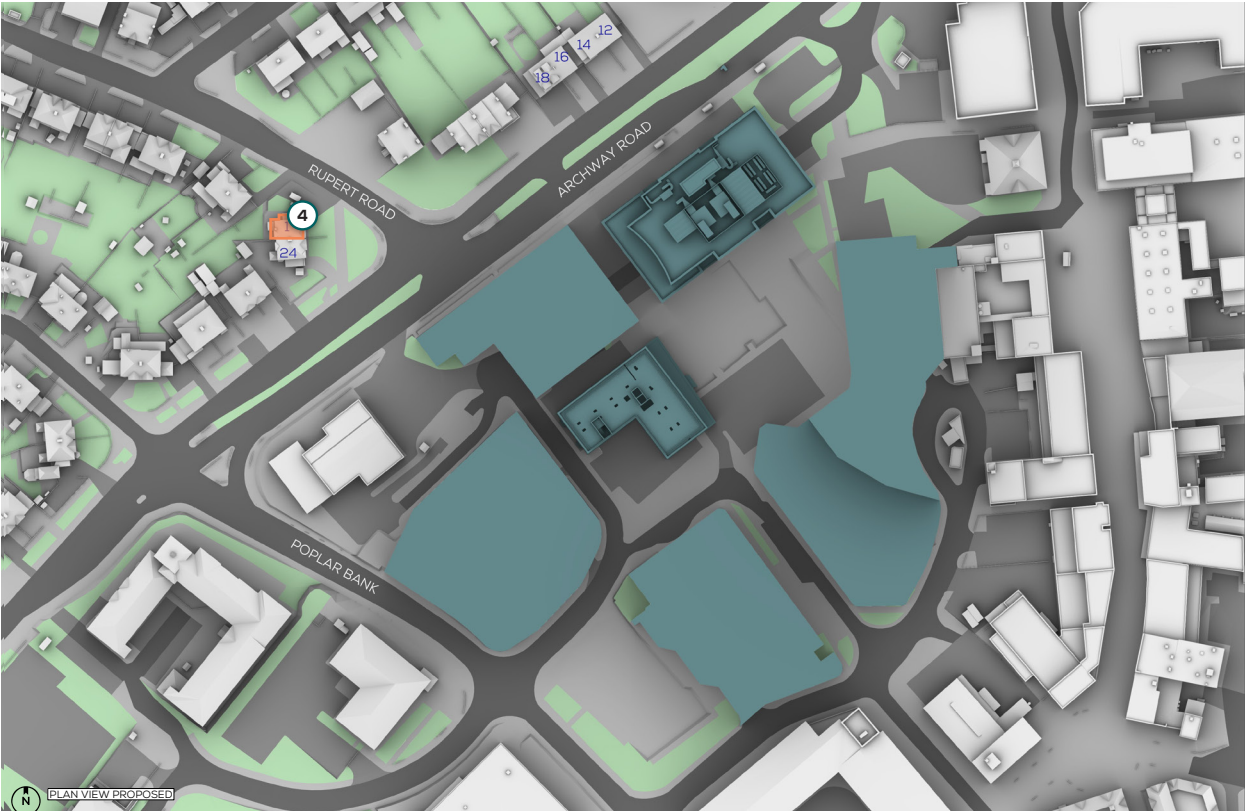
Daylight

- 5.5 The residential properties at 12-18 Archway Road are to the north-west of the Proposed Development.
- 5.6 The various assessments outlined within the BRE guide compare the conditions in the existing scenario to those with the Proposed Development in place. As such, the results of each assessment is dependant on both the existing and proposed configuration of the site in equal measure.
- 5.7 This is a key consideration in respect of understanding the results to 12-18 Archway Road, as the area of the site adjacent to these properties is currently a clear, surface car park, and so introducing any new massing adjacent to these properties would lead to reduction of some degree.
- 5.8 For VSC daylight, 16/25 (64%) windows would fully accord with the BRE recommendations. Of the nine that fail to meet the criteria, seven would experience a minor reduction between 20-30% and two would be reduced between 30-40%.
- 5.9 When examining the effects in detail, there is a bedroom window affected at 12 Archway Road would experience a minor changes in VSC daylight of 20.1% (against a BRE recommendation of less than a 20% change).
- 5.10 Of the remaining eight windows between 14-18 Archway Road, five serve bedrooms which the BRE states to have a lesser requirement for daylight.
- 5.11 For NSL daylight, 14/16 (88%) rooms would fully accord with the BRE recommendations. Of the two that fail to meet the criteria, a bedroom would experience a reduction of 26.4%, which has a lesser daylight requirement and a living room of 32.7%.
- 5.12 The living room would experience a light loss of 2.8 sq. m and retain 66.8% of sky visibility in the proposed scenario.
- 5.13 Overall, the existing configuration of the site means that introducing significant massing will inevitably lead to some changes in the level of light received by the surrounding properties. Notwithstanding, it is our view that these changes would not impart unacceptable impacts that affect the amenity and living conditions of building occupants.

Sunlight

- 5.14 GIA have considered six rooms and eight windows within 12-18 Archway Road that face within 90° due south of the site relevant for sunlight assessment.
- 5.15 There is a single window serving a living room that experiences an annual sunlight alteration of 21.4%, and will retain 22% APSH in the proposed scenario. However, the living room benefits from a mitigating window, and the overall room meets the BRE recommendations.
- 5.16 As such, for APSH, all rooms assessed would fully accord with the BRE recommendations.

1 RUPERT ROAD



VERTICAL SKY COMPONENT					NO SKY LINE				
WINDOW					ROOM				
TOTAL	PASS	LOSS			TOTAL	PASS	LOSS		
		20-30	30-40	40+			20-30	30-40	40+
11	8	2	1	0	3	3	0	0	0

Table 05 - VSC Results - 1 Rupert Road

Table 06 - NSL Results - 1 Rupert Road

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

Table 07 - APSH Results - 1 Rupert Road

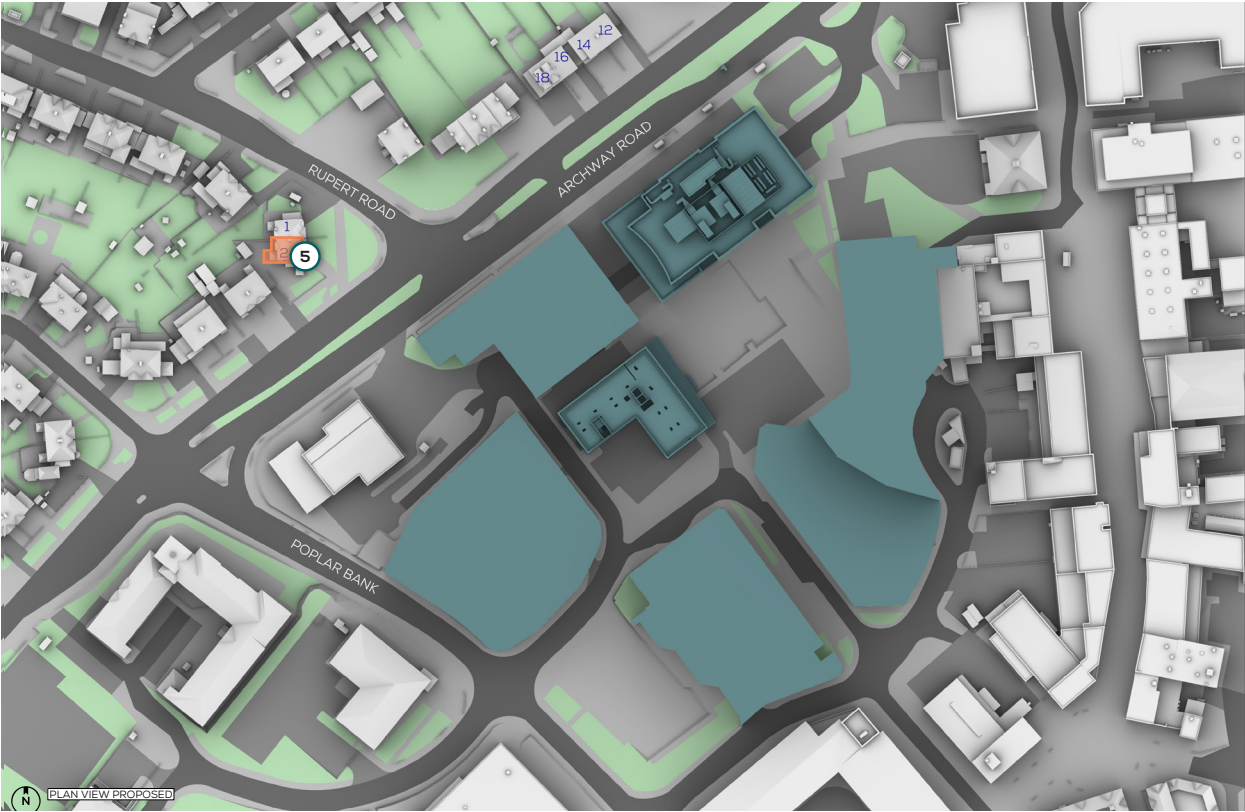
Daylight

- 5.17 The residential property at 1 Rupert Road is to the north-west of the Proposed Development.
- 5.18 With the Proposed Development in place, this property will fully comply with the BRE recommendations for NSL daylight.
- 5.19 For VSC daylight, 8/11 (73%) windows would fully accord with the BRE recommendations. Of the three that fall short of the criteria, two experience minor reductions of 20.6% and 25.7% and the remaining a reduction of 32.3%.
- 5.20 When examining the effects in detail, all three windows that fall short of the VSC criteria serve rooms with alternative windows. The BRE states that where a room is served by more than one window of a similar size, the mean VSC to the room can be calculated. When adopting this approach in respect of 1 Rupert Road, all three rooms would meet the VSC requirement.
- 5.21 As such, 1 Rupert Road would fully accord with the BRE recommendations for VSC daylight, and the amenity of the occupants would not be affected.

Sunlight

- 5.22 GIA have considered one room and two windows within 1 Rupert Road that face within 90° due south of the site relevant for sunlight assessment.
- 5.23 With the Proposed Development in place, the living room and its serving windows will fully accord with the BRE criteria for APSH sunlight.

24 ARCHWAY ROAD



VERTICAL SKY COMPONENT					NO SKY LINE				
WINDOW					ROOM				
TOTAL	PASS	LOSS			TOTAL	PASS	LOSS		
		20-30	30-40	40+			20-30	30-40	40+
13	11	2	0	0	3	3	0	0	0

Table 07 - VSC Results - 24 Archway Road

Table 08 - NSL Results - 24 Archway Road

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

Table 09 - APSH Results - 24 Archway Road

Daylight

- 5.24 The residential property at 24 Archway Road is to the north-west of the Proposed Development.
- 5.25 With the Proposed Development in place, this property will fully comply with the BRE target criteria for NSL daylight.
- 5.26 For VSC daylight, 11/13 (85%) windows would fully accord with the BRE recommendations. The two windows that fail to meet the criteria, experience minor alterations of 20.7% and 27.3%.
- 5.27 Notwithstanding, as with 1 Rupert Road, both windows that fall short of the VSC criteria serve rooms with alternative windows, and when calculating the VSC to the room, both rooms would fully accord with the BRE criteria for daylight.
- 5.28 As such, 24 Archway Road would fully accord with the BRE recommendations for VSC and NSL daylight, and the amenity of the occupants would not be affected.

Sunlight

- 5.29 GIA have considered one room and three windows within 1 Rupert Road that face within 90° due south of the site relevant for sunlight assessment.
- 5.30 With the Proposed Development in place, the bedroom and its serving windows will fully accord with the BRE criteria for APSH sunlight.

6 CONCLUSIONS

GIA have undertaken a daylight and sunlight assessment in relation to the Proposed Development known as St Michael's Place, Huyton. The technical analysis has been undertaken in accordance with the BRE handbook.

- 6.1 GIA have undertaken daylight and sunlight assessments on the adjacent residential properties to the St Michael's Place Proposed Development to understand the potential effect on their amenity.
- 6.2 Our assessment of the Proposed Development is based upon the maximum parameters model for the site. Further detailed assessment of the outline elements will be undertaken at reserved matters stage as required.
- 6.3 Upon successful completion of the Proposed Development, for Vertical Sky Component ("VSC"), 66/80 (83%) windows across eight properties will fully accord with the BRE recommendations.
- 6.4 For No Sky Line ("NSL") 45/47 (96%) rooms and for Annual Probable Sunlight Hours ("APSH") sunlight, all rooms will fully accord with the BRE recommendations.
- 6.5 Overall, the majority of windows and rooms assessed would not experience any noticeable reductions in daylight or sunlight, and where noticeable reductions do occur, they are generally minor in BRE terms.
- 6.6 There are some larger changes in the levels of daylight received by the properties at 12-18 Archway Road, and given that the area of the site adjacent to these properties is currently a clear, surface car park, changes to the existing light levels are to be expected if the site is to be developed. Notwithstanding, the properties at 12-18 Archway Road will still retain levels of daylight that are contextually appropriate for an urban environment.
- 6.7 In summary, it is our view that the Proposed Development would not impart unacceptable impacts that affect the amenity and living conditions of surrounding neighbours.



What we do:

Climate & Resilience
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Light Obstruction Notices
Measured Surveys
Party Wall & Neighbourly Matters
Rights of Light
Solar PV
Wind Analysis

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