

Strategic Environmental Assessment (SEA)

Initial Screening Statement

For Shopfront Design Guide (Supplementary Planning Document)

October 2025

1. Introduction

This Initial Screening Statement has been prepared to help determine the need for a Strategic Environmental Assessment for the following document:

Shopfront Design Guide SPD – November 2025 Consultation Draft

A public consultation will take place on this document between **Friday 14th November and Friday 12th December 2025** (provisional dates).

The Council is reviewing, updating and consolidating two existing Supplementary Planning Documents (SPDs) into one new SPD. Its purpose is to provide guidance to planners and developers on the design of retail premises, shopfronts and signage, as well as the integration of security measures. It will aim to encourage entrepreneurship and economic activity by recognising the important part design can play in achieving this. In particular, it will look at the strengths of existing buildings and streetscapes, and how these can be enhanced by better design. The SPD will support and supplement Policies EN3 and DS3 of the adopted Core Strategy (and Policies EN4 and DS3 of the emerging Local Plan).

2. Strategic Environmental Assessment (SEA)

The requirement for a **Strategic Environmental Assessment (SEA)** is set out in the Government's practical guidance on applying *European Directive 2001/42/EC*, and in the *Environmental Assessment of Plans and Programmes Regulations 2004*. These documents place an obligation on local planning authorities to undertake an SEA on any land use plan or programme "*which sets the framework for future development consent of projects*".

The Government's *Planning Practice Guidance* (2014) states that supplementary planning documents "*may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the relevant strategic policies.*"

To determine whether significant environmental effects are likely the local planning authority should take into account the criteria specified in *Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004* and they should consult the relevant consultation bodies.

Section 7 provides details of the consultation which has been carried out with the Statutory Bodies and Section 8 provides the final determination outcome.

3. Sustainability Appraisal of the Local Plan

Sustainability Appraisal (SA) is the process by which the requirement for SEA Directive is applied to Local Plan documents. An SA is required under the Planning and Compulsory Purchase Act 2004 for all Development Plan Documents (DPDs).

The main difference between SEA and SA is that an SEA has more of an environmental focus, while an SA has a wider sustainability focus encompassing social, economic and environmental issues.

Although SEA and SA are distinct requirements, government guidance has recommended a single appraisal process and the guidance on undertaking SAs has been prepared so as to incorporate the requirements of the SEA Directive.

Relevant DPDs that have been subject to a Sustainability Appraisal are:

- Bradford Local Plan Core Strategy (adopted 2017)
- Bradford City Centre Area Action Plan (adopted 2017)
- Shipley and Canal Road Corridor Area Action Plan (adopted 2017)

In addition, a Sustainability Appraisal has been undertaken of the draft Preferred Options for the emerging Bradford District Local Plan (February 2021).

The *Town and Country Planning (Local Development) (England) (Amendment) Regulations 2009* removed the previously automatic need for an SA of SPDs, and the Government's *Planning Practice Guidance* (2014) states that "*Supplementary planning documents do not require a sustainability appraisal*".

4. Shopfront Design Guide SPD

The Council previously prepared and adopted the Shopfront Design Guide as an SPD in December 2007. This SPD provided guidance on the design of shop fronts throughout the district and supported policies in the Replacement Unitary Development Plan (RUDP) (Principle Policy UDP3 together with Design Policies D1, D9, D13 and Built Heritage Policies BH4, BH4A, BH5, BH6, BH8 and BH13). The Council also prepared and adopted the Shop Keepers Guide to Securing their Premises SPD in December 2012. This SPD provided guidance on how shop front security measures should be designed and integrated, including the installation of roller shutters. This SPD superseded Section 6 of the Shopfront Design Guide.

Since these SPDs were adopted there have been changes to national and local policy and local circumstances, as well as a changing retail environment which require the content of these documents to be reviewed and updated.

The Council is looking to streamline and amalgamate the content of these documents into one SPD. The new document will provide further guidance and supplement the details found in policies in the Core Strategy:

- Policy EN3: Historic Environment
- Policy DS3: Urban Character

and the Bradford City Centre Area Action Plan:

- Policy CL3: Active Frontages and Community Provision
- Policy BF1: The Nature of the Built Form

and the Shipley and Canal Road Area Action Plan:

- Policy SCRC/SE5: Shipley Town Centre and Primary Shopping Area

Core Strategy Policy DS3: Urban Character is the main parent policy for this SPD. The policy indicates that the "*design of shop front units should be consistent with the character, scale, quality and materials of the existing façade, building and street scene of which they form part*". The SPD will provide further details on the characteristics and principles which should be followed when designing new shopfronts, as well as providing information on the best use of materials. It will include examples of best practice in the different commercial locations across the district.

Core Strategy EN3: Historic Environment also emphasises the need of proposals to respect and reinforce the distinctive character of the District in which they are located. It makes specific reference to the Shopfront Design and Security Guides. The conservation and enhancement of the historic environment are particularly important in the district's centres – many of which form the historic core of each settlement. The SPD will therefore be important in ensuring new development is managed in a sensitive way which respects the historic assets of the District's retail centres.

The main objectives of the SPD include:

- Review and update – review and update the two current documents and combine them into one new supplementary planning document (SPD).
- New examples/case studies – identify new examples/case studies relevant to different contexts across Bradford District including city/town centres, traditional high streets and inner-city neighbourhoods.
- Modern shopfronts – introduce new content on modern shopfronts and how they can be designed successfully (the current guidance focuses mainly on traditional shopfronts).
- Security – consider a more responsive approach to external security measures in circumstances where there is demonstrable need (e.g. properties at high risk of crime), linked to good standards of design and wider enhancements to shopfronts.
- High quality design – ensure the highest standards of design are retained, especially in centres and historic areas and buildings.
- New solutions – include guidance on more recent innovations such as Hammerglass/glazed polycarbonate panels.
- Final output – create a design guide which is clear and concise, very practical and usable, and very visually engaging and distinctive to Bradford.

5. Screening Process

To assess whether an SEA is required, the Responsible Authority (Bradford Council) must undertake a screening process based on a standard set of criteria, and this must be subject to consultation with Historic England, the Environment Agency and Natural England.

Where the Responsible Authority determines that the plan or programme is unlikely to have significant environmental effects, and therefore does not need to be subject to full Strategic Environmental Assessment, it must prepare a statement showing the reasons for this determination.

The Council has undertaken a screening process using the criteria set out in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations

2004 (Annex II of the SEA Directive). These criteria are set out in Appendix 1 of this document, along with the Council's response in relation to the proposed SPD.

The initial screening finds that the proposed contents of the draft Shopfront Design Guide SPD are unlikely to have significant effects on the environment, and as such it will not be necessary to carry out an SEA on this document.

6. Conclusion

The Council believes that the new Shopfront Design Guide SPD will have positive environmental impacts in Bradford District based on the screening against the SEA Directive Criteria – see Appendix 1.

Furthermore, the SPD will not be setting new policy, it will be supplementing and providing further guidance on existing policies set out in adopted DPDs which have been subjected to SEA as part of full Sustainability Appraisals. It is providing an update to the existing SPDs, based on new national and local policy and changes in local circumstances.

Therefore, it is not considered that a full SEA is required for the Shopfront Design Guide SPD.

Appendix 1 – Response to the SEA Directive Criteria

1. Characteristics of the draft Shopfront Design Guide SPD having particular regard to:

SEA Directive Criteria (as specified in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004)	Bradford's Response	Is there a likely significant effect?
(a) The degree to which the SPD sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	The SPD will specifically provide support to Policies EN3 and DS3 of the adopted Core Strategy (Policies EN4 and DS3 of the emerging Local Plan). The Core Strategy currently provides the strategic framework for development in the Bradford District. The SPD will provide guidance on how to design shopfronts that are sympathetic to local character and the qualities of the district's commercial centres, whilst understanding the security needs of retail premises. The SPD will provide a robust and up-to-date design approach and guide for planners and developers. The SPD will not allocate resources.	No
(b) The degree to which the SPD influences other plans and programmes including those in a hierarchy.	The guidance provided in the SPD will be supplementary and in conformity with policies in the above stated DPDs which have been subject to full Sustainability Appraisals. The SPD sits in a hierarchy of documents but does not directly affect any other plans or programmes. It is influenced by higher tier planning policy including the National Planning Policy Framework (NPPF).	No
(c) The relevance of the SPD for the integration of environmental considerations in particular with a view to promoting sustainable development	The primary aim of the SPD is to provide additional guidance to developers on the design of shopfront and security measures which respect the individual character of the location in which the proposed development is situated. Specifically in areas of	No

SEA Directive Criteria (as specified in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004)	Bradford's Response	Is there a likely significant effect?
	historic importance the guide will provide solutions of how security measures can be incorporated into the design of shopfronts without harming the character of the area or the historic significance. The SPD can be used by planning officers to judge whether proposed developments have satisfied the policy requirements and adequately addressed any potential impacts on the townscape or any applicable heritage assets. The SPD is therefore relevant to the integration of environmental considerations in particular with a view to promoting sustainable development.	
(d) Environmental problems relevant to the SPD.	The SPD serves to address environmental issues. The policy content of the adopted Core Strategy and emerging Local Plan will additionally apply to forthcoming development proposals which include numerous thematic policies related to environmental protection. All Local Plan policies have been subject to Sustainability Appraisal within the context of the preparation of Local Plans. The respective SAs indicate that Core Strategy Policies EN3 and DS3 and emerging Local Plan Policies EN4 and DS3 would have a positive impact against a number of SA objectives. This includes positive impacts against SA objectives: 6 (Maintain and enhance the character of natural and man-made landscapes); 7 (Protect and enhance historic asset and their settings); 11 (Improve the quality of the built environment and make efficient use of land buildings); 13 (Provide social cohesion, encourage participation	No

SEA Directive Criteria (as specified in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004)	Bradford's Response	Is there a likely significant effect?
	and improve the quality of all neighbourhoods); and 14 (Create good cultural, leisure and recreation activities available to all). This Screening Report focuses on those (direct / indirect) environmental problems or sources of potential problems relevant to the SPD. The main environmental problems considered by the SPD are: • Heritage at risk • Impact on townscape The SPD will set out guidance to help to address and manage these problems. The SPD will help to support the policies to guide positive change and ensure adequate mitigation where necessary.	
(e) The relevance of the SPD for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The SPD will not impact on the implementation of community legislation on the environment.	No

2. Characteristics of the effects and of the area likely to be affected, having particular regard to:

SEA Directive Criteria (as specified in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004)	Bradford's Response	Is there a likely significant effect?
(a) The probability, duration, frequency and reversibility of the effects.	The overall impact of the SPD will likely be positive. It will seek to maximise the positive environmental effects of development and minimise or avoid negative impacts.	No
(b) The cumulative nature of the effects.	As the likely effects of this SPD will be largely positive any cumulative impacts will also be positive.	No
(c) The transboundary nature of the effects.	The guidance in the SPD will be limited to developments within Bradford District.	No
(d) The risks to human health or the environment (for example, due to accidents).	It is not envisaged that the guidance contained within the SPD will pose risks to human health or the environment.	No
(e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	The guidance in the SPD will be applicable to those relevant development types (mainly shopfront developments) as set out in the SPD. The SPD will apply across the full Local Authority area of the City of Bradford Metropolitan District, with the intended exception of the Saltaire World Heritage Site due to the very special nature of that site. The Council already has a Shopfront Design Guide specific to the Saltaire WHS in place.	No
(f) The value and vulnerability of the area likely to be affected due to —	The value and vulnerability of the area covered by the SPD has been considered. The SPD is applicable to developments across a number of areas within the Bradford District, which include a large amount of heritage assets including many conservation areas and listed	No

SEA Directive Criteria (as specified in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004)	Bradford's Response	Is there a likely significant effect?
(i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use	buildings in addition to the World Heritage Site (see 2e). These are protected by specific policies in the Core Strategy (and new draft Local Plan) which has been subject to assessment through a full Sustainability Appraisal. The SPD provides further guidance to support and reinforce the relevant parts of these policies.	
(g) The effects on areas or landscapes which have a recognised national, Community or international protection status.	The SPD will provide support to Policy EN3 of the adopted Core Strategy (Policy EN4 of the emerging Local Plan) which seeks to protect and enhance the district's heritage. These policies have been subject to assessment through a full Sustainability Appraisal. Although the Bradford District does not include any national landscape designations, it does border two (Yorkshire Dales National Park and Nidderdale National Landscape), and also includes the South Pennine Moors Special Protection Area (SPA)/Special Area of Conservation (SAC) and the Saltaire World Heritage Site. These designated sites are protected by separate policies in the Local Plan. The SPD is unlikely to have an impact on the internationally designated habitat sites or landscapes. In relation to the Saltaire World Heritage Site, the Council already has a Shopfront Design Guide specific to the WHS in place. The SPD will not replace this but will cross-refer and link to it. The relationship between the two documents will be carefully considered to ensure protection for	No

SEA Directive Criteria (as specified in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004)	Bradford's Response	Is there a likely significant effect?
	the site in support of Local Plan Policy EN3.	

7. Consultation with the Statutory Bodies

The three statutory consultation bodies were consulted on Monday 1st September for a period of 5 weeks until Monday 6th October 2025.

The following responses were received from the statutory bodies:

Statutory Body	Consultation Response
Historic England	Thank you for consulting Historic England about the above Screening Opinion. In terms of our area of interest, given the nature of the SPD, we would concur with your assessment that the document is unlikely to result in any significant environmental effects and will simply provide additional guidance on existing Policies contained within the Adopted Development Plan Document which has already been subject to a Sustainability Appraisal/SEA. As a result, we would endorse the Authority's conclusions that it is not necessary to undertake a Strategic Environmental Assessment of this particular SPD. The views of the other three statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made.
Natural England	Thank you for your consultation on the above dated and received by Natural England on 1st September 2025. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.

Statutory Body	Consultation Response
	Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again. Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.
Environment Agency	I can formally report that the Environment Agency do not usually contribute to SEA screening requests and would only expect to input at the formal consultation on the scoping stage. We acknowledge that both documents will aim to supplement parent policies within the adopted Core Strategy DPD, which itself was fully subject to the SEA process. We therefore won't have any comments to make on the SEA screening requests for either of these documents: • Landscape Character Assessment SPD • Shopfront Design Guide SPD

The responses from the consultation bodies support the Council's conclusion that a full SEA is not required for the SPD.

8. Determination

As stated above an assessment has been made against the SEA criteria to determine whether the SPD would have any likely significant effects. This assessment finds that the content of the SPD and its application is unlikely to have any significant effects on the environment. It identifies that there could be some potential positive effects but that these are not considered to be significant.

The Council has taken account of the consultation responses from the statutory bodies and determines that Strategic Environmental Assessment is not required for this SPD.

This determination is made on 24th October 2025.

9. Next Steps

Consultation on the draft SPD will now be undertaken in line with the relevant legislation and the Council's Statement of Community Involvement. The consultation responses will be considered and changes made where appropriate.