

Habitats Regulations Assessment (HRA) 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 Habitats Regulations Assessment (HRA) 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. Habitats Regulation Assessment (HRA)

Bradford Council (as a competent authority) is required to consider whether its planning documents would have a significant adverse effect upon the integrity of internationally designated sites of nature conservation importance including 'European Sites' (now referred to as Habitat Sites) which are designated within the District.

This consideration is undertaken through a process known as a Habitats Regulations Assessment which is a requirement of the Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulations).

European sites (Habitat sites) provide important habitats for rare, endangered or vulnerable natural habitats and species of exceptional importance within Europe. These sites consist of Special Areas of Conservation (SACs, designated under the Habitats Directive) and Special Protection Areas (SPAs, designated under European Union Directive 2009/147/EC on the conservation of wild birds (the Birds Directive)). (These directives were translated into UK law and have been retained following the UK's exit from the European Union) (European Union (Withdrawal) Act 2018 and Conservation of Habitats and Species Regulations 2017).

Bradford District includes an area of the South Pennine Moors designated as a Special Protection Area (SPA) and a Special Area of Conservation (SAC). These are protected because they contain habitat types which are rare or threatened, and due to the importance of breeding bird populations.

3. HRA Screening of the Local Plan Core Strategy

The adopted Local Plan Core Strategy for Bradford was subject to HRA screening and assessment throughout its development. The final HRA documents for the Core Strategy are:

- HRA Screening Assessment for the Draft Core Strategy DPD (by Environ, 2012)
- Further Engagement Draft of Core Strategy: Appropriate Assessment (by UEEC, 2013)
- Publication Draft Core Strategy HRA Report (by UEEC, February 2014)
- HRA for the Bradford District Core Strategy: Appropriate Assessment Report (by UEEC, December 2014)

The Core Strategy HRA identified a range of likely significant effects on the South Pennine Moors that could result from the Core Strategy for the Bradford District including:

- Loss of supporting habitats (directly or indirectly);
- Increased water demand;
- Impacts on water quality;
- Increased emissions to air;
- Collision mortality risk and displacement due to wind turbine developments;
- Recreational impacts, including walkers, dogs, trampling and erosion;

- A range of urban edge effects, including fly-tipping, invasive species, wildfire and increased predation.

It concluded that taking into account the range of avoidance and mitigation measures incorporated into the plan, the Core Strategy will not result in adverse effects on the ecological integrity of the European Sites.

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 shopfronts 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 shopfront 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. Conclusion

The purpose of the Shopfront Design Guide SPD is to support and provide guidance on policies contained within the Core Strategy DPD, as such it is considered that the HRA screening and assessment for the Core Strategy is relevant to the SPD.

The potential effects of the Shopfront Design Guide SPD on the integrity of the Protected Habitat Sites (European Sites) are deemed to have been considered during the HRA screening and assessment of the policies in the Core Strategy. The SPD parent policies (Policy DS3: Urban Character and EN3: Historic Environment) were assessed as having no negative effect on the integrity of the protected sites. They were considered to be either policies which would not in themselves lead to development (because they relate to design) or they are intended to conserve or

enhance the natural, built or historic environment where enhancement measures will not be likely to have any negative effects on a Habitats Site (European Site).

Given that the SPD plays a supporting role to the policies, it is unlikely to have any adverse effects on the integrity of the Habitat Sites (European Sites) either alone or in combination with other plans or projects. As the SPD does not introduce new planning policy it is recommended that no further Habitats Regulations Assessment work is required.

6. Consultation with Natural England

Consultation on this initial screening statement was carried out with the Statutory Body Natural England for a period of 5 weeks from Monday 1st September until Monday 6th October 2025.

The Council received the following response:

Statutory Body	Consultation Response
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. 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.

7. Determination

As stated above it is not considered that contents and application of the SPD will have any adverse effects on the integrity of the European sites (Habitat Sties) either alone or in combination with other plans or projects. The consultation response from Natural England has been reviewed and any further comments received at the SPD public consultation stage will be taken into consideration. Therefore, at this time it is determined that HRA is not required, but this may change if the consultation process highlights any concerns.