

FURTHER NOTE

SILCHESTER NEIGHBOURHOOD PLAN

1. Regulation 14 Consultation

As set out in my earlier Note, I wrote to the Borough Council on the 7th July 2025:

(1) Could you please let me know if there has been a full and focused Regulation 14 Consultation by the Parish Council with the residents of Silchester? I am aware that the village magazine was delivered three weeks after the start of the Regulation 14 Consultation. The Parish Council website simply stated that the Consultation started on the 6th November.

(2) In the response dated 8th July 2025 the Borough Council has referred me to the following documents – the Parish Council’s Consultation Statement April 2025; the Silchester Neighbourhood Plan Comment Compliance Check letter; the Silchester Neighbourhood Plan Compliance Check List and the Borough Council’s advice note for Neighbourhood Plans which includes advice on community engagement.

In reviewing the list of documents, I note the Borough Council provides advice to its Parish Councils in a Neighbourhood Plan protocol document. For effective community engagement it recommends holding events/drop-in sessions, adverts/posters, letters/flyers to everyone in the neighbourhood area, questionnaires/comments forms, use of websites, social media, and e-mail, and notice in parish newsletters/local magazines. I am satisfied that the community engagement process during the preparation of the neighbourhood plan has adopted this recommended approach.

Paragraph 8.6 of the protocol document reinforces the need for all consultation material to include details of the plan, details of where and when the plan can be viewed (including the locations of hard copies), details of how to make representations, and the date by which representations must be submitted. Paragraph 8.7 reminds Parish

Councils to keep all the consultation material for examination. This is consistent with the requirements of the Neighbourhood Plan regulations¹.

Borough Council's Compliance Check

The Council's compliance check list letter dated 15th May 2025 confirms its view that the statutory consultation undertaken to date by the Parish Council does comply with the requirements and regulations set out under Paragraph 4 of Schedule 4B of the TCPA 1990 and as prescribed by Regulation 14 of the Regulations.

It states:

The Consultation Statement demonstrates that these requirements have been satisfied: (1) The Consultation Statement (dated April 2025) shows that the Regulation 14 consultation was publicised via a variety of means including emails to statutory consultees and non-statutory consultees (including local community groups), information on the parish council website, posters on village notice boards, and information about the consultation in the parish newsletter. As such, it is considered that through the consultation methods outlined above, the Regulation 14 consultation would have brought the Plan to the attention of people who live, work, or carry on business in the area. Example documents can be found in Appendices G to L of the Consultation Statement.

Examination Comments

The Appendices G to L in the Consultation Statement includes examples of the Regulation 14 consultation which took place between 6th November 2024 and 18th December 2025 including an extract of the Parish Council website, the text used in consultation material, statements that the materials were posted on notice boards and included in the village newsletter.

Notably, in respect of consultation with residents the consultation involved:

¹ Paragraph 4 of Schedule 4B of the TCPA 1990 and The Neighbourhood Planning (General) Regulations 2012, Section 14.

- A newsletter delivered to residents in the last week of November – (approximately 24th November 2024 onwards) allowing a 3½ week period in which to make representations
- Details of the consultation on five local notice boards and the Pavillion
- A note on the Parish Council website which states the consultation commenced on 6th November 2024 with a link to the Plan documents. Notably, the information contained within Appendix G of the Consultation Statement does not demonstrate that the website included the necessary information required by the regulations including details of how to make representations, and the date by which representations must be submitted.
- Email notification to Community Groups

Request for information from Parish Council

To support the conclusion that the Regulation 14 consultation requirements are met, can the Parish Council provide a screenshot of the website which demonstrates that it included details of how to make representations, and the date by which representations must be submitted.

Request for review from Borough Council

In the light of the comments above, do the Borough Council still consider that the Plan, as submitted, complies with the requirements The Neighbourhood Planning (General) Regulations 2012, Section 14.

2. Strategic Environmental Assessment

The Borough Council completed a Screening Opinion on the draft Plan in October 2024 ahead of the Regulation 14 consultation. Specifically, the screening opinion considers the impact of draft policy S8 - Site Allocation – at that time, an allocation of approximately eighteen homes.

The Borough Council considered that:

‘the impacts upon the Silchester Conservation Area and heritage could be considerable and widespread and the potential significant environmental effects resulting from the Neighbourhood Plan have not

already been considered and dealt with through a Sustainability Appraisal of the LPA's Adopted Local Plan. In light of the above an SEA will be required.'

I am satisfied that the Borough Council's conclusions are appropriate and a strategic Environmental Assessment Report, dated March 2025, was submitted in accordance with the regulations.²

In response to a request for links to the relevant Neighbourhood Plan evidence base, the Borough Council has provided me with a Scoping Report. However, this document is an early exploration of the potential policy areas that the neighbourhood Plan might consider rather than a specific SEA Scoping document.

As stated in legislation³ and national guidance,⁴ the scoping stage needs to identify the scope and level of detail of the information to be included in the environmental report. A key aim of the scoping procedure is to help ensure the strategic environmental assessment is proportionate and relevant to the neighbourhood Plan being assessed.

Request for information from the Parish Council

Can the Parish Council please confirm whether a separate SEA Scoping Report was prepared or whether the Parish Council consider that the 'scoping stage' is included in chapter 2 of the SEA Report?

The SEA regulations, complemented by national guidance, requires a consultation with the consultation bodies on the scope of the strategy environment assessment. It is not clear from the submissions that such a consultation was completed. Can the Parish Council clarify the preparation and the process of the SEA Scoping Stage in accordance with the SEA regulations.

Request for information from the Borough Council

The SEA is required to identify reasonable alternatives and for these to be evaluated (Section 12 of the Regulations). An evaluation can include alternative sites and an evaluation of the neighbourhood plan if it were not to be made.

² The Environmental Assessment of Plans and Programmes Regulations 2004.

³ The Environmental Assessment of Plans and Programmes Regulations 2004, Section 12.

⁴ Strategic environmental assessment and sustainability appraisal, 31st December 2020.

In response to the Regulation 16 consultation the Borough Council's states the SEA has not considered any reasonable alternative to the allocated site. For clarity, does the Borough Council consider that the SEA fails to meet the requirements of the regulations and national guidance to identify reasonable alternatives?

EDWARD COUSINS

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22nd July 2025