



**Your Ref** PRW/sh  
**Our Ref** AG/PCL/9439  
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Mr P Williams  
 Forward Planning Team Leader  
 Mid Devon District Council  
 Phoenix House  
 Phoenix Lane  
 Tiverton  
 EX16 6PP

Dear Mr Williams,

**REGULATION 6 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012**

**APPLICATION FOR DESIGNATION OF A NEIGHBOURHOOD AREA - CREDITON**

We write on behalf of our client, Waddeton Park Ltd, who have interests in Mid Devon District. We enclose representations on our client's behalf in response to Crediton Town Council's request for designation as a 'Neighbourhood Area'.

The *Neighbourhood Planning (General) Regulations 2012* set out the procedure that relevant bodies (such as Town Councils) must follow in order to designate a 'Neighbourhood Area'. These Regulations state that such an application must include:

- A map which identifies the area to which the area application relates;
- A statement explaining why this area is considered appropriate to be designated as a Neighbourhood Area; and
- A statement that the organisational body making the area application is a relevant body for the purpose of Section 61(G) of the 1990 Act.

The Town Council's letter dated 20<sup>th</sup> February 2014, with accompanying plan, clearly follows the correct procedure as set out by the Regulations. The Town Council consider it appropriate to designate the whole Parish area as a 'Neighbourhood Area'. It is difficult to fault the logic of the Town Council, as there must surely be a strong presumption that any 'Neighbourhood Area' will be the same as the relevant Parish boundary. Whilst there is limited case law, due to the nascent status of the process, the *Neighbourhood Development Plans* (NDP) that are in place (and those which are emerging) give credence to Crediton Town Council's approach i.e. that the whole Parish is considered to be an appropriate 'Neighbourhood Area'. In this instance there are no compelling reasons, nor justification to deviate from this fast becoming established approach.

Therefore, we wholeheartedly support the designation of the whole Parish of Crediton as a 'Neighbourhood Area'.

Thank you for the opportunity of commenting. We ask that you acknowledge receipt of these comments and keep us informed of all future stages of the neighbourhood plan process.

Yours sincerely,

Alex Graves BA (Hons) PG Dip MRTPI  
**For PCL Planning Ltd**