



Woodbury Parish Neighbourhood Plan

Submission Version Representation Form

The proposed Woodbury Parish Neighbourhood Plan has been prepared by Woodbury Parish Council. It has been formally submitted to East Devon District Council who are legally required to undertake public consultation. The consultation closes at **9am** on **27th November 2025**.

Please use this form to make representations (comments) on the Plan, or preferably, submit your comments direct through our consultation portal online at:
<https://woodburyparishneighbourhoodplanreg16.commonplace.is/>.

Using this form

Please use a separate form for each representation you wish to make and state your name or organisation on each page. Please note we cannot accept anonymous responses. Your name, address and your comments will be made publicly available on our website. Other personal details (signature, personal email address and telephone number) will not be visible, however your representation will be shared in full as submitted with the independent examiner.

If you are not responding through the consultation portal, please return your completed form(s) and any additional information to East Devon District Council:

By email: planningpolicy@eastdevon.gov.uk

By post: Angela King, Planning Policy team, East Devon District Council,
Blackdown House, Border Road, Heathpark Industrial Estate, Honiton, EX14 1EJ

Representations received after 9am 27th November 2025 may not be accepted.

Data Protection

Any personal information you provide will be held and used by East Devon District Council for the purpose of producing the neighbourhood plan and may inform other Planning Policy work. Your information may also be shared within East Devon District Council for the purposes of carrying out our lawful functions. The content of your representation including your name will be made available on our website, and your representation with all contact details will be supplied to the independent examiner specifically for the sole purpose of the examination of this neighbourhood plan submission. Otherwise your personal information will not be disclosed to anybody outside East Devon District Council without your permission, unless there is a lawful reason to do so, for example disclosure is necessary for crime prevention or detection purposes. Your information will be held securely and will not be retained for any longer than is necessary. There are a number of rights available to you in relation to our use of your personal information, depending on the reason for processing. Further detail about our use of your personal information can be found in the [Neighbourhood Planning Representations Privacy Notice](#) on the data protection pages on our website.

Part A – Personal Details

Please enter your details as appropriate below. Please note your full name and address must be provided as a minimum. Please see page 1 for details on how we use your data.

Your Personal Details

Title:	
First name:	
Last name:	FWS Carter & Sons
Job Title (where relevant):	
Address:	C/O Agents
Postcode:	
Telephone number:	
Email address:	

Your Agent's Details

If you are using an agent, please fill in your title, name and organisation above and the full contact details of the agent below. Where applicable, an agent will be the point of contact for any correspondence.

Title:	Mr
First name:	Nick
Last name:	Matthews
Job Title (where relevant):	Planning Director
Address:	Savills, Dock House, Welshback, Bristol
Postcode:	BS1 4SB
Telephone number:	01179100300
Email address:	

Part B - Representation Details

Enter Your Name/Organisation in the box below (Please state this on each sheet):

Question 1

To which section of the Neighbourhood Plan submission does this representation relate?
Please state in the box below the point of reference for your representation (this means the policy, paragraph number or other reference as appropriate)

Section 7 and Policy 12.

Question 2

Please use the box below to explain why you are supporting or objecting to this part of the plan. If your comment relates to a specific area of land or site please identify it on a map if possible. (Continue on a separate sheet as/if necessary.)

Enter Your Name/Organisation in the box below (Please state this on each sheet):

Savills on behalf of FWS Carter and Sons

Question 4

If your representation is seeking a change to the Plan, do you consider it necessary to speak at the examination?

Please note if you select 'No' your representation(s) will still be fully considered by the independent Planning Inspector by way of written representations.

Please select as appropriate:

- No, I do not wish to speak at the examination
- Yes, I wish to speak at the examination

If you have answered yes above and wish to speak at the examination, please outline in the box below why you consider this to be necessary:

The Greendale Business Park is a major employer in Woodbury and wider across East Devon. Restricting its contribution in the manner proposed within Policy 12 would stifle economic growth and investment contrary to Government policy. Robust representations are submitted and these should be examined at the forthcoming Examination of the Neighbourhood Plan.

Please note this will not be regarded as a binding decision but will help us in our planning of the examination. The Inspector will ultimately determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the examination. If the Examiner does not consider it necessary to hold a public examination, consideration will be given by way of written representations.

Future Correspondence

Please indicate by selecting yes or no as appropriate, whether you wish to be notified of:

1. The publication of the recommendations of any person appointed to carry out an independent examination of the Woodbury Neighbourhood Plan? Y N
2. The adoption of the Woodbury Neighbourhood Plan? Y N

Enter Your Name/Organisation in the box below (Please state this on each sheet):

Savills on behalf of FWS Carter and Sons

Signature

Please sign and date your form in the box below.

Please note a signature is required by the Planning Inspectorate. If filling in the form electronically it can be an 'electronic signature' by typing in your name in the box. If you provide a handwritten signature we will ensure that it is not published on-line but it will be visible on the paper copies available at our offices and sent to the Inspector.

Signature: Nick Matthews

Date:

25.11.2025

21 November 2025
Woodbury NP Representations by Savills on behalf of Greendale (Nov 2025)



Woodbury Neighbourhood Plan (WNP)

Nick Matthews MTCP MRTPI

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Dear Sir / Madam,

**Woodbury Neighbourhood Plan (WNP)
Regulation 16 Submission Version**

We welcome the opportunity to comment upon the emerging Woodbury Neighbourhood Plan (WNP) Regulation 16 Submission Version (September 2025).

Our client, FWS Carter and Sons, is a significant landowner within the WNP area. Its principal landholding is the Greendale Business Park (GBP), a major local employment area which is home to approximately 220 businesses ranging from long-standing multi-national companies to small start-up enterprises. There are currently approximately 3,000 employees working across the GBP. Before we comment upon the draft policies of the WNP, it is helpful to set the scene by providing background on the GBP and the proposals for its future expansion.

The Greendale Business Park – Background and Context

The GBP has expanded incrementally over the years in response to considerable market demand. There has, and continues to be, significant interest in operating at GBP, especially among small-medium sized enterprises (SMEs), due to the provision of good quality, affordable accommodation. Rental levels are considerably lower than other employment locations within the authority area and given the ongoing inflationary pressures and consequential economic challenges facing many businesses, affordable accommodation is crucial to their long-term sustainability.

In addition to accommodation, one of the greatest challenges for businesses, particularly SMEs and start-ups, has been the rising cost of energy. Commercial enterprises do not benefit from the Government energy price cap and so have been particularly hard hit by the energy crisis following the war in Ukraine. As widely reported in the media, rising energy prices have significantly impacted businesses across the country. This has not been the case at GBP – not only does the Business Park provide affordable accommodation, but it also benefits from its own direct, locally sourced renewable energy. Occupiers have saved money on energy bills in recent years, allowing these businesses to further invest in their productivity and staffing rather than spending money on energy.

FWS Carter and Sons have invested significantly in the on-site Anaerobic Digestion (AD) plant which, for the vast majority of time, supplies 100% of the electricity needs of the Business Park. The major component of the



'diet' for the AD plant is the highly calorific cattle manure which is recovered from the on-site sheds. On average there is approximately 50 tonnes of manure being fed into the AD plant daily; manure that has travelled no distance. The energy from the AD plant is therefore not only a reliable source of electricity but generated from a genuinely sustainable source.

In a drive to further enhance its sustainability credentials and contribution towards *net zero*, photovoltaic arrays have also been installed on the rooftops of a number of buildings within the Business Park, these include a 750KW array on one of the largest buildings at GBP. In total, the GBP generates approximately 1MW of electricity from photovoltaics.

Combined the AD Plant and photovoltaics generate sufficient energy to meet the needs of an expanded Business Park with this renewable energy all being generated on site.

There are two very strong benefits to this:

- The sustainability of the energy generation is a core value and ESG objective for many businesses. Securing 100% of the energy needed by the business from on-site renewable generation is therefore an attractive proposition; and
- Energy generated by the on-site AD plant and photovoltaics has been estimated to save occupiers approximately 20% in energy costs when compared to electricity sourced from the national grid; a substantial cost-saving for SME businesses.

The continued success and expression of confidence in the Business Park has been a catalyst for the owners to investigate the potential for further future expansion. It is the objective of FWS Carter and Sons to undertake the expansion in a planned and coordinated manner. To that end, a masterplan for the expansion of the GBP has been prepared and this submitted to East Devon District Council (EDDC) through the Local Plan process in order to inform the allocation of areas for growth.

The Masterplan (a copy of which is appended to this representation) is based on a systematic and robust analysis of environmental and landscape considerations in the locality. Robust technical investigations were undertaken to inform this Masterplan, including landscape & visual impact, transport, drainage, and ecology assessments.

The benefits of the Masterplan were assessed and found to be able to deliver a major boost to the East Devon economy:

- creating an estimated 1,368 new permanent jobs;
- generating circa £90m Gross Value Added, which represents a 3.5% growth on the GVA in East Devon (2020);
- delivering an additional £2.3m in business rates, approximately half of which would go to the authority to support local priorities;
- rebalancing the employment market, diluting the reliance placed upon the service industry and boosting average wages;
- addressing unemployment; and
- reducing out-commuting from the authority to employment in Exeter and elsewhere.

The environmental-led masterplanning of the Business Park demonstrated how these considerable economic benefits could be delivered in a manner which would not only have a limited impact on the environment but which would accord with (and in some cases exceed) many of the emerging policy aspirations.

In the remainder of this representation we comments on the specific policies of the WNP which are relevant to our client's interests.

Utility Infrastructure

FWS Carter and Sons are committed to supporting the transition to a green economy and strongly support the objectives of Policy 5: Green Energy Initiatives. To that end they have invested heavily in renewable energy generation; investment which, as explained above, means that for the vast majority of the time 100% of the electricity needs of the GBP are met through on-site generation.

The proposed expansion of the GBP would continue in that vein; increasing the renewable energy generation on site in order to meet the needs of future occupiers. In that respect, the Masterplan proposals for the GBP would comply with Policy 5 of the WNP and positively support it's aspirations for sustainable growth.

Environment

The WNP contains three proposed policies relating to the environment which together seek to enhance the natural landscape, secure a biodiversity net gain and support wildlife in new developments.

As explained above, these environmental considerations have been at the forefront of the masterplanning process undertaken by FWS Carter and Sons for the expansion of the GBP.

Landscape

In developing the Masterplan for the GBP, landscape sensitivity, and the potential visibility of new development at the Business Park, were assessed using LiDAR land height data and photography. A 'Zone of Theoretical Visibility' assessment was undertaken, to understand the impact of new buildings of varying heights across the business park expansion land. Views from Woodbury Salterton were specifically considered and assessed.

Visibility from key receptors was a key factor in the masterplanning of the site, and indeed landscape impact was the driving force behind the selection of the areas proposed for development. This robust exercise found that the development of Plots F1 and H (the two development areas within the reduced site boundary) could reach heights of 12m-14m before they would become visible from the National Landscape to the south of GBP.

It is recognised that the development of the site would change the local landscape character. To assist with integrating the expanded Business Park into the local landscape, additional tree planting in the forms of orchards and woodlands are proposed at the perimeter of the Masterplan area to provide a natural form of visual mitigation from viewpoints in Woodbury Salterton. As noted within the Masterplan, these interventions would mitigate any perceived negative impacts on the landscape.

Landscape impact has therefore been carefully considered and addressed as part of the Masterplanning proposals in accordance with Policy 7 of the WNP.

Biodiversity Net Gain and Wildlife Enhancement

The Masterplan demonstrated that the site is capable of delivering significant on-site gains in biodiversity. The preparation of the Masterplan was informed by a detailed desk-based ecological study and a Phase 1 Habitat Survey which found that the site mainly comprised agricultural (arable) land of low ecological value.

The Masterplan was subsequently designed with the biodiversity metric in mind, along with the objectives of the Clyst Valley Regional Park (with specific focus on the Grindle Brook corridor). Development areas are concentrated on those parts of the site with low biodiversity value, with surrounding areas providing a net biodiversity gain through habitat creation. New habitat features are proposed, such as meadow grassland, orchards, woodland planting, wetlands, new and enhanced species-rich hedgerows, along with bird/bat/invertebrate boxes within built areas.

FWS Carter and Sons have committed to providing at least 25% BNG through the development, exceeding the aspirations of EDDC and the statutory minimum of 10%. This would be achieved through the provision of new woodland planting etc. The proposals are therefore not only entirely compatible with Policies 8 and 9 of the WNP but would deliver biodiversity enhancements which represent a significant public benefit.

Business

We agree with much of the supporting text in Section 7 of the WNP in relation to business and economic growth.

- Paragraph 7.1 recognises the valuable business and employment opportunities that exist within the neighbourhood plan area for many residents;
- Paragraph 7.2 acknowledges the importance of economic growth to promote and sustain higher standards of living. It also recognises that business and economic conditions are constantly changing and this needs to be reflected in the response to future growth; and
- Paragraph 7.6 outlines the business objectives which generally encourage employment opportunities.

Yet despite this very positive recognition of the importance of economic growth to livelihoods and well-being, and the acknowledgement that business and economic conditions are constantly changing, the WNP applies a blanket moratorium on the growth of the existing (and demonstrably successful) business parks beyond their current footprint. This moratorium on their future growth appears to be at odds with the generally positive support for business in the WNP.

Many of the businesses within the GBP are small startup enterprises in need of affordable accommodation. Examples of SME businesses which have become established in the GBP include:

- Powder Keg Brewery – an award winning local start-up craft ale brewery .
- Just Wood Furniture – a family-run company specialising in bespoke, handmade furniture making beautiful kitchens, cabinets, wardrobes, and more.
- Parris Paint – a company which offers a range of high-quality vehicle painting and body repair services.

These and many others need the opportunity to establish and grow. The GBP has provided that opportunity, providing suitable, low-cost space but it is now at capacity. There is a long list of businesses of different sizes looking for new accommodation and whom have registered their interest for space on the GBP. There is unfortunately simply not the space available however to accommodate these requirements within the existing footprint of the Business Park.

For that reason, we strongly object to the proposed moratorium on the growth of the existing GBP at Paragraph P12.1 in Policy 12. There is no evidence to support such a moratorium and indeed doing so would conflict with the broader objectives of supporting small business growth within the Neighbourhood Plan area. We therefore recommend that Paragraph P12.1 of Policy 12 is deleted.

Conclusion

As explained within this representation, the proposals for the GBP contained in the expansion Masterplan would largely comply with the policies of the WNP, delivering an expanded Business Park which would:

- be powered by renewable energy generated on site, in accordance with Policy 5;
- deliver new landscaping which would mitigate the visual impact of development; and
- secure biodiversity net gain and wildlife enhancement which would exceed the statutory requirements and those of the emerging local plan, and thus comply with Policies 8 and 9;

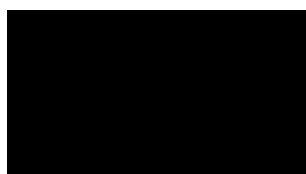
The only area of conflict with the emerging policies comes in relation to a single line within Policy 12 which seeks to limit the growth of the Business Park to their existing footprint.

Government has been clear that there is a need to boost economic growth and productivity. Business parks such as GBP provide an incredibly valuable source of affordable and sustainable business floorspace for a range of businesses of different types and sizes. Placing a moratorium on further growth of GBP at a time when (a) there is demonstrable demand for growth; and (b) that growth would achieve environmental, social and economic benefits is contrary to the broad thrust of Government policy.

Rather than place a moratorium on the expansion of the GBP, the WNP should actively support the principle of sustainable growth which is compatible with its broad environmental social and economic policies.

We would welcome the opportunity to meet with the Parish Council and to explain our representations and the proposals for the GBP further if that would be of assistance.

Yours faithfully



Nick Matthews MA MTCP MRTPI
Director