

Dear Secretary of State,

I am writing to you as Chair of Long Ashton Parish Council and on behalf of our community just outside of Bristol. Thank you for responding positively to our earlier letter to the Secretary of State, this has allowed us to complete our deliberations, hold an EGM of the Parish Council and agree this fuller submission contained in this letter.

**The Long Ashton Parish Council respectfully request that the application be called in by The Secretary of State for further consideration as this is an issue of national importance, sets a precedent and is in direct conflict with the National Planning Policy Framework (NPPF), conflicts with the draft North Somerset Local Plan (2040) and the recommendation of Bristol City Council that the application should be refused.**

North Somerset District Council wrote to you on 16 January 2025, and you confirmed receipt of their submission on 20 January. Their submission to you refers to a planning application on green belt land on the edge of Bristol in North Somerset for the office headquarters of EPIC, which, to our surprise, was recommended for approval by the officers of North Somerset Council and then agreed 8–5 by the North Somerset Planning and Regulations Committee on behalf of the whole Council.

We are a small Parish Council conforming to democratic processes with limited resources but determined to support our community, who were 96% against the application, along with others, including Bristol City Council, South Bristol, and many other parish councils in North Somerset. Additionally, there were 728 objections submitted via the North Somerset Council Planning Portal, compared to just 43 submissions in support. Objections have also been lodged by an unusually high number of statutory bodies, including Historic England, highlighting the significant and irreparable harm this development would cause to the green belt, national and local heritage, landscape, environment, and agricultural land.

**Application No: 23/P/2185/FU2 Proposal: Hybrid planning application (full and outline elements) with Environmental Statement for the construction of new office campus (Use (Class E(g)(l)) with associated external and below ground works. Full application (on a phased basis) comprising three office buildings, culinary building, training centre and auditorium. New accesses from the public highway, internal site roads and footpaths, public realm works, site drainage, landscaping, solar PV field, ancillary plant, servicing and other associated works. Below ground works including ancillary plant, car and cycle parking and geothermal borefield. Outline application comprising two further office buildings (access, layout, scale and landscaping for approval, appearance to be reserved for subsequent approval) [amended description]. Site address: Epic Systems (Healthcare), Land SW of Long Ashton Park and Ride, off Gurney Roundabout (A370) and Colliters Way, Long Ashton.**

## The Planning Application

Hybrid planning permission (full and outline elements) is sought for the construction of a new low density office campus development in the Green Belt on the edge of Bristol in Long Ashton. The development comprises three office buildings, a culinary building, a training centre and auditorium with associated access, parking, groundworks, landscaping and a solar PV field. The outline application comprises two further office buildings, with access, layout, scale and landscaping for approval with appearance reserved for subsequent approval. The Gross Internal Area (GIA) of the proposed development equates to 104,545 square metres.

## Conflict with The National Planning Policy Framework

The application raises significant issues of national importance, namely that it conflicts with National Planning Policies on making the best use of land as it fails to follow a sequential approach to land selection contrary to planning guidance on sustainable development and the policy set out on town centres and the Green Belt.

## Town Centres

The decision is contrary to national policy around Town Centres. Epic's submission 'Town Centre Use Sequential Assessment' prepared by Rapleys LLP fails to justify why an out-of-town low density campus style development in the green belt is their only option for securing development and economic growth. This is in direct conflict with the requirements set out in the National Planning Policy Framework (paragraphs 91-92) or within the National Planning Practice Guidance (Town Centres and Retail paragraphs 11-12). The applicants have failed to consider flexibility contrary to NPPF which states that when applying the sequential test applicants should show flexibility.

Indeed, the Planning Officers report to the Committee (Jan 15) states that, "*Epic have particular and exacting requirements in terms of any prospective site.*" Not only is it a requirement that all roles at Epic are located within the same campus, but also that staff have "*a stimulating natural environment also allows staff to step outside and recharge as required. Urban locations will therefore not provide the environment that is required for Epic's work and productivity.*".

In opposing the development, Bristol City Council have stated that:

*"on the basis of the information provided it is evident that the sequential approach is not sufficiently addressed and that there are sequentially preferable locations at which the proposed development could be located. It has not been demonstrated why national planning policy should set aside in this case. The City Council therefore maintains and reiterates the concerns that it has previously expressed regarding the proposal's consistency with national planning policy for centres.*

*Paragraph 5.8 of the Town Centre Use Sequential Assessment acknowledges that there are sites within BCC boundaries that are capable of cumulatively delivering this development at the proposed scale set out in the development proposal and in a*

*sequentially preferable location. The justification given for why these sites were not seen as suitable is not elaborated on in detail. The document states that should the development take place in these locations then it would impact the operational requirements of the offices (as set out in paragraphs 2.12 to 2.19 of the assessment). BCC does not consider that these constitute persuasive market or locational requirements for the purposes of paragraph 12 of the NPPG.” (Bristol Council’s submission of 04/10/2024)*

This is indeed backed up by the Parish Council’s own independent reports on site selection (see two Reports from Planning Potential for LAPC dated 24/03/24 and 20/09/24).

The Parish Council contends that Epic’s lack of flexibility amounts to a preference rather than a need. Other businesses operate successfully within higher density office buildings within city and town centres as indeed has Epic for the last 8 years. To allow Epic to exercise a preference contrary to National Planning Policy, would be to undermine the planning system both locally and nationally.

Epic has stated that if it does not relocate to this site, it cannot remain at its existing three offices within Bristol City Centre and will vacate the city centre and indeed the country. However, well established national planning policies should not be cast aside in response to the threats of individual companies, particularly where, with some flexibility, they could be accommodated on other sites with considerably less impact. Furthermore, if granted, the decision would have a negative impact upon the vitality of town centres, particularly at a time where many smaller businesses are struggling post Covid changes to working from home. The proposal will also result in the relocation of existing Epic jobs within Bristol City centre and the termination of a lease on three office buildings as these jobs will move to the new campus.

### Sustainable Development

The proposal for a major out of town office campus on a green field location within the Green Belt is inconsistent with relevant national and local planning policies which aim to secure sustainable development. The out-of-town location would be liable to result in significant reliance on car journeys, particularly given the lack of public transport links. National planning policy advises that new development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location (NPPF paragraph 159). Inward investment of this type could be favourably located within the city, close to the two universities, the three large hospitals, close to a range of housing and where there is good public transport, cycling, pedestrian friendly public realm, and a major train station, Temple Meads, with short journey times to the airport and London. This is not the case on the Green Belt site where the road network cannot cope today let alone with over 1,000 more cars in the proposed development, there are few possibilities for major shared transit solutions and the economic gains from clustered proximity with other partners cannot be easily made. While acknowledging the proposed environmental measures, the location of the proposal and its transport implications are inconsistent with the principles in national planning policy.

## Green Belt

The site of the proposed development remains within the designated Green Belt the status of which has not been proposed for any change in the emerging North Somerset Local Plan. Indeed, North Somerset Council employed consultants to conduct a review of the Green Belt whilst preparing their draft local plan 2038. Their consultants concluded that application site was of high value in terms of the green belt functions that it performs. The proposal would represent an unplanned development which would affect the openness of the existing Green Belt, and which would considerably erode the separation of Bristol from the village of Long Ashton. It would also mean that the active farm utilising the land would have to close. Having regard to emerging national planning policy, the site does not appear to conform with the proposed definition of 'grey belt'.

Whilst it may be necessary and appropriate on occasion to amend green belt boundaries, this should be done through the local plan process. This site has not been redesignated in the local plan and certainly has not been proposed as employment land, despite North Somerset having been aware of Epic's proposed application towards the end of the plan making process. The site therefore has not been subjected to a rigorous assessment of alternative employment sites within North Somerset by the council nor put forward for public consultation in the selection of 'options' and 'preferred options' during the plan making process. This undermines the whole of the plan making process and significantly erodes public confidence in plan making. It sends the message that large or wealthy companies can do as they wish and do not have to follow the same rules that apply to others. This therefore has implications beyond just the local area.

Indeed, in the NS Planning Committee Report of 15<sup>th</sup> January 2025, the Council, by their own admission, conclude that the proposal is contrary to a substantial amount of its planning policies and in conflict with the emerging draft local plan as a whole.

The proposal is in particular conflict with Core Strategy policy CS20 which seeks to support a successful economy, boost economic performance and to provide a wider range of job opportunities within Weston Super-Mare, Clevedon, Nailsea, Portishead and then within settlement boundaries. The site is not within any settlement boundary and its location, on the edge of Bristol does little to address employment growth within those settlements. It would encourage commuting from those areas, particularly given its proposed parking facilities, rather than integrating employment opportunities within those areas of greater need. Any economic benefits would far more likely favour Bristol, yet despite this, Bristol City Council oppose this development.

In addition to the main concerns over the lack of a thorough sequential site selection, impact upon town centres and the considerable negative impact to the Green Belt, other harms arise including the loss of Grade 3a agricultural land, the loss of a farm, and harm to the historic and natural environment.

For the reasons above, we contend that the application represents a complete departure from the NPPF. It is also in direct conflict with the Draft North Somerset Local Plan as a whole. The application is particularly controversial, to the extent that Bristol City Council object to it. To proceed without further review and rigorous scrutiny would seriously undermine confidence in the planning system at both national and local level. The application is of a similar scale and raises similar issues to application APP/MO6555/V/22/3311877 Land at Bradly Hall Farm which was called in and subsequently refused. We therefore ask that, for consistency of approach, this application is also subject to a Planning Inquiry by The Planning Inspectorate and therefore ask the Secretary of State to call this application in.

Yours sincerely,

Dan Smith  
Chair of Long Ashton Parish Council