



5 April 2025

Planning Policy
Department for Place
PO Box 1954
Bristol
BS37 0DD

By email: policy.consultation@southglos.gov.uk

Dear Sir or Madam,

South Gloucestershire Local Plan Regulation 19 Publication Draft Objection to Policy LP14 – A Missed Opportunity to Harness Pilning Station as a Transport Solution

We write on behalf of the **Pilning Station Group** in response to the South Gloucestershire Local Plan Regulation 19 Draft. We are deeply concerned about the continued neglect of Pilning Station in transport strategy planning, especially in light of the proposed expansion of the Severnside Employment Area via Policy LP14.

The Regulation 19 Local Plan fails to include a policy to safeguard **Pilning Railway Station**, despite its critical potential role in supporting workforce accessibility to the new employment area at Severnside. **Pilning Station Group** objects to this omission for the following reasons:

1. Pilning Station as an Overlooked Transport Solution:

Pilning Station is a vital, yet grossly underutilised, strategic transport asset sitting within metres of the proposed development site "Land East of B4055". Any serious attempt to address transport capacity, congestion, and sustainable commuting to and from the Severnside area must include the revitalisation of Pilning Station. To exclude it from consideration while simultaneously proposing to remove land from the Green Belt for more development is both short-sighted and contradictory to national planning principles.

2. Equal Weight for Rail and Road Solutions:

The draft Local Plan rightly acknowledges the pressures the B4055 and surrounding rural road network will face from increased industrial traffic, particularly from HGVs. The Infrastructure Delivery Plan confirms these roads are not suitable for significant commuter or freight traffic.

Yet no mention is made of Pilning Station, the only existing heavy rail link in immediate proximity to the proposed development. It sits on the main Cardiff to Bristol line, with infrastructure in place and the potential for direct connections to central Bristol, South Wales, and beyond. The ARUP study further notes that the station "offers improved connections to a wider variety of places than the other options, and seeks to make better use of an underutilised asset."

Enhancing Pilning Station's services and accessibility would provide immediate, clean, and efficient commuting options for workers, significantly reducing road traffic and the need for costly road upgrades or mitigation measures.

3. Compliance with the National Planning Policy Framework (NPPF):

The National Planning Policy Framework (NPPF) requires planning authorities to consider sustainable transport solutions at the earliest stage. Ignoring Pilning Station as a commuter hub fails this directive, particularly when February 2021 feasibility studies demonstrated that Pilning could support hourly services in both directions using existing timetable allowances. There are no exceptional circumstances to justify further Green Belt loss while a viable rail-based alternative solution remains ignored.

4. Economic Growth and Green Belt Protection:

Rather than expanding Severnside into the Green Belt, South Gloucestershire Council should focus efforts on unlocking the potential of the land already allocated by ensuring it is accessible to a wider labour market. This cannot be achieved through road infrastructure alone. Public transport, especially rail, must play a central role.

Enhancing Pilning Station would:

- Open Severnside to commuters from both sides of the Severn without car dependency;
- Relieve pressure on inadequate road networks such as the B4055, Berwick Lane, and Easter Compton routes;
- Support the delivery of strategic employment growth without compromising the Green Belt;
- Align with both local and national net-zero carbon targets.

5. Infrastructure Strategy Alignment:

The **Core Strategy** established the importance of comprehensive transport planning to unlock development potential at Severnside. Safeguarding Pilning Station aligns with these goals and mirrors best practices from other local plans (e.g., the Mole Valley Local Plan 2020-2039 and the Wiltshire Core Strategy), which protect unfunded infrastructure of strategic significance. Local authorities play a role in **safeguarding infrastructure projects** that are deemed nationally significant (**NSIPs**), even if funding is not immediately available. This includes monitoring and enforcing Development Consent Orders (DCOs) and ensuring alignment with long-term strategic goals.

6. Complementary Role in an Integrated Transport Network:

ARUP's Strategic Case (attached herewith) highlights that Pilning Station could "form a hub for the local area, serving in-commuters switching to rail, visitors to leisure and retail opportunities, and local residents' trips." Its integration would bring significant environmental benefits by encouraging public transport use and providing an alternative to car dependency.

Our Position

We strongly object to Policy LP14 and the proposed expansion of the Severnside Employment Area unless and until a commitment is made to:

1. Recognise Pilning Station as a strategic transport node;
2. Safeguard land and investment for station enhancement and improved service levels;
3. Integrate rail into the Local Plan's employment and transport strategy on an equal footing with road proposals.

South Gloucestershire has an opportunity to lead by example: protect the Green Belt, invest in sustainable public transport, and make development genuinely inclusive and accessible.

We urge you to amend the Local Plan accordingly.

Also attached is the Strategic Case for Pilning Station, completed by ARUP in 2021. This document highlights the need to improve connectivity in Pilning and provides a detailed assessment of various options to address these concerns.

We appreciate your attention to this matter and look forward to your response.

Yours sincerely,

Olga Taylor

Chair of Pilning Station Group

Encl. Pilning Station Strategic Case, ARUP 2021

NOTES

- a) Pilning is located on the South Wales Main Line and is the last station in England before the Severn Tunnel. Its service suffered progressive rundown and was reduced in 2006 to one train each way on Saturdays only. Trains can only call during daylight hours as the station lighting has been removed.
- b) Despite stiff local opposition, the station's footbridge was controversially demolished in November 2016 to make way for electrification wires, cutting off access to the westbound platform altogether and rendering the service "one direction only" (towards Bristol). To return, passengers have to go through the Severn Tunnel into Wales, change at Severn Tunnel Junction and return the way they have just come, extending a 20-minute journey to one-hour-plus.
- c) The history of the area's inhabitants campaigning for improved services at Pilning station goes back to the end of the 19th century. It was revived by a local resident Jonathan King between 1990 and 2014, leading to the establishment of Pilning Station Group in its current form in 2016, with a purpose to represent users and potential users of Pilning Station, dismayed by the demolition of the station footbridge earlier that year. The Group is supported by the local MP, Severnside businesses and leisure attractions, as well as the local community.

Further information and background: see www.pilningstation.uk