To: Oxfordshire Open Thought, c/o Oxfordshire Growth Deal, Speedwell House, Speedwell Street, Oxford OX1 1NE

From: Hazel and Steve Dawe, Cowley Area Transport Strategy – [www.catg.org.uk](http://www.catg.org.uk)

53 Bulan Road Oxford OX3 7HU – 12th August 2021

**Submission Oxfordshire Infrastructure Strategy consultation**

In view of the very poor questions online and user-unfriendly design, and the heroic failures of assumptions in your summary report, we have decided to make this submission in hard copy. Our submission can be seen in OTHER RELEVANT SUBMISSIONS at [www.catg.org.uk](http://www.catg.org.uk) to allow downloading of a copy if desired.

**Assumption failures and omissions:**

We must bear in mind the IPCC report concerning the Climate Emergency, and the linked ecological emergency emphasised by the global loss of about 150 species per day and the UK being the most environmentally-impoverished country in Europe. This means minimising additional physical infrastructure - including the use of concrete and tarmac - is a vital part of cutting UK greenhouse gas emissions and of protecting existing biodiversity.

We are, frankly, horrified by the absence of strategic thinking in County documentation we have seen to date about Adaptation to Climate Change – including in this Summary Report. We have done some preliminary research on what Adaptation, with enhanced mitigation, would require for Oxford. This can be seen under REPORTS at [www.catg.org.uk](http://www.catg.org.uk)

New homes on greenfield sites do not just create new roads, but also a variety of other infrastructure incl schools, play areas, GPs surgeries, shopping units etc. So, homes bought by local councils for council and keyworker housing in existing urban settlements will generate far less carbon emissions in retrofitting and operation than the total carbon burden of new construction.

The exodus of EU citizens and what appear to be declining birth rates according to the Office of National Statistics mean that fantastical housing projections are even less meaningful than before. Such projections have never considered the complete Climate Emergency and related Ecological Emergency implications of the casual spread of infrastructure across the landscape. Consequently, the purchase of homes by councils for council housing and keyworker shared ownership schemes is to be favoured over new build, provided sustainable retrofitting is done.

We reiterate our opposition to any trunk road building and our support for re-opening all disused rail lines. We note that the supposed infrastructure requirements for Oxfordshire have about £3bn of projected funding against a deemed need for £9bn. This alone provides a good reason to drop ALL road building, and most road ‘improvement’ projects other than those adding bus lanes, or creating more (preferably segregated) cycle tracks.

Dual use of car parks is a key general omission in this strategy. We can reduce traffic movements by diminishing car parking, using car parks private and public for housing around their fringes, above surface level and with the abolition of car parks in areas with heavy traffic congestion - all to discourage car movements in favour of active travel and public transport use.

Where new build for passivhaus standard housing is desirable is the disused plots in industrial estates and science parks. With increased home working, use of such sites may diminish - especially if Oxfordshire's councils strongly support home working to cut traffic movements, improve family life and support facilities in the localities where people live.

Online shopping, aided by the Corona Virus, has created a lot of vacant units in shopping areas which should be adapted for homes or non-commercial usages - e.g. charity shops. Allowing people who work in commercial centres to live within walking distance of workplaces would be a good use of declining shopping centres.

Infrastructure retention and repair, such as repairing roads and pavements, is always preferable to wholly new build, and this is likely to be more efficient in terms of carbon implications and resource demand. The existing built environment should, as a principle, be re-purposed to meet the actual demand for very low-cost housing for Oxfordshire, within existing settlements.

Strategic gaps which are barriers to increasing population through new home building include an inadequate NHS due to under-funding and staff shortages. There is also a crippling lack of investment in teaching in our schools. Neither of these problems are likely to change under the present Government, or under the present scale of the overall tax base.

We reject the building of new Park and Rides and expansion of existing ones since services and Active Travel should deal with commuting. Encouraging car movements by over-generous car parking provision is what has encouraged substantial vehicle movements in the County; progressive reduction in car parking year on year will contribute to cutting car use.

**Comments on the Summary Report:**

**p.3.** It is not possible to have ‘..sustainable, clean, healthy and inclusive growth..’ unless air pollution from buildings and transport is eradicated. Housing and consequent transport expansion planned for Oxfordshire makes this a meaningless statement. **Growth is not desirable**, only prosperity without growth, with minimal environmental impacts.[[1]](#footnote-1)

**p.4.** The primary needs for all biodiversity are protection from development and damage. Restoration is certainly desirable too, but the precautionary principle and the polluter pays principle both need applying through the planning system and the enforcement of environmental law and regulations.

**p.10.** Growth in infrastructure cannot be associated with decarbonisation when more use of cement and tarmac are involved. This is misleading.

**p.13.** Reducing road transport emissions depends upon a) avoiding induced traffic increases by not increasing roads or road space for vehicles; b) ensuring existing settlements use the existing built environment for additional housing units, and car parks, and industrial-science park spaces to ensure people are able to live near where they work; c) a major effort to ensure that those who can work at home and wish to do so have the right to do so, to cut commuting by car; d) increasing the cost of journeys into urban areas by the use of Electronic Road Pricing – see our report on applying this to the Oxford City Region under REPORTS at [www.catg.org.uk](http://www.catg.org.uk) Adaptation to Climate Change is in itself a source of key infrastructure considerations which are not present in this summary report (see our Assumptions/Omissions section above).

Recovery of nature begins with a commitment not to damage it further by development. Building the wrong homes, at the wrong prices, in the wrong places is a strategic failure in infrastructure thinking and of Oxfordshire 2050 as an idea.

**p.14.** Better walking arrangements require more pedestrianised areas, with improved cycle tracks, to help stop tailpipe and non-exhaust emissions from vehicles. These are strategic County-wide needs for urban settlements of more than 10,000 people as a minimum and in some communities of smaller size plagued by traffic.

**p.15** Whilst the summary document refers to Active Travel, there is too much proposed road building, implied road widening and emphasis on junction improvements which appears to be for vehicles rather than cyclists. Active Travel spending should exceed such spending to compensate for decades of under-investment as a health promotion measure, and as an action to reduce greenhouse gas emissions.

**p.17** The absence of sufficient water in the Swindon and Oxfordshire Water Resource Zone by 2023 is a major constraint upon home building and consequent population increase in the County. Bearing in mind signs of population decrease nationally and locally, housing projections need to be revised downwards to allow use of the existing built environment particularly.

**p.18** Mobility and connectivity assumptions were dealt huge blows by the importance of local facilities to households through the Corona Virus crisis. Also, mobility and connectivity are less important to the millions who can and should be enabled to work from home. Local facilities and infrastructure are a priority for these reasons, and in a country with far more online shopping than before. Strategic networks for cargo bikes in urban settlements for deliveries is not mentioned and is of vital importance. The hollowed-out town and City Centres with their empty shops should be re-purposed for very low-cost housing, rather than being sustained by the idea that the ‘new normal’ looks just like pre-pandemic.

**p.22** There is no Zero Emission Zone in Oxford. There are only plans for an Ultra-Low Emissions Zone. The elimination of all vehicle movements in an ULEZ, therefore removing tailpipe and non-exhaust emissions, would be needed for a ZEZ. Also, emissions from buildings would have to be zero too.

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1. Tim Jackson, *Prosperity without Growth,* 2ND edition, 2017. [↑](#footnote-ref-1)