

IV. THEME FOUR: PLANNING FOR SUSTAINABLE TRAVEL AND CONNECTIVITY

• Policy option 17 - Towards a Net Zero Transport Network

We **welcome** the proposed measures for a **net zero transport network**, especially the role foreseen for **active travel**, the **integrated approach to land-use planning needs** in the RTPi, and the commitment to implementing Paragraph 104 (d) of NPPF 2019, i.e., to provide among others for **high quality walking and cycling networks**.

However, we would like to see a stronger commitment than merely proposing to “*support the delivery of improvements*”, or to “*take opportunities to support delivery*” of urgently needed measures.

What is urgently needed to address the climate (and health) emergency is a **more ambitious draft, with firm commitments to outcomes, deliverables, and (even approximate) timelines**. The **synergies with measures on air pollution** represent a win-win, in terms of addressing both population health, and climate change issues.

Overall, planning measures towards a zero carbon transport network should firmly integrate existing settlements, and new settlements (see policy option 18 for further detail) should be people-centred and incentivise active travel, while **planning out car dependency**.

The current priority given to motorised transport over active travel needs to be reversed. Alternative forms of transport must be made easier to access and use than driving, and also cheaper – the current **cross-subsidisation of polluting transport modes including private cars has to stop. Instead, externalities in terms of climate change and environmental damage have to be internalised, and fully passed on to end pricing** (as a result of a misguided cross-subsidisation policy, driving is currently relatively inexpensive).

We would advocate exploring **Low Traffic Neighbourhoods, Low Emission Zones, congestion charging and road pricing**, according to local needs / circumstances, as ways of reducing the amount of traffic and/or mitigating its effects. Funds raised must be **invested in improved and/or new cycle and pedestrian routes, and to reduce bus fares**. The pandemic showed that with fewer cars on the roads, people take to cycling.

Active travel depends on having **safe, segregated and continuous cycle routes, wide pavements free of obstacles and designed for use by wheelchairs and buggies, and convenient crossings over busy roads. Strategic networks for cargo bikes in urban settlements** for deliveries is not mentioned enough, but they are important.

The pace of electrification of transport needs to be increased through a better EV charging infrastructure. Cooperative promotion by the city, other districts and the county should boost a two-pronged trend: (1) decreasing the number of households with private car ownership, and (2) encouraging recourse to car clubs and car hire.

Car parking is not mentioned in the Plan, but **in combination with other measures (especially stepping up public transport), reducing car parking space can be used strategically to discourage car use.** New housing and commercial developments **should design out parking space and use car-free covenants, to redirect demand towards active travel.** Where absolutely necessary, car clubs / car-sharing schemes can be used. Incidentally, dual use of already existing car parks is a key omission in the Oxfordshire Plan 2050: building above car parks could add considerably to much-needed low-cost housing.

Improving public transport is vital if individual car use is to be reduced, and bus services need to be made much more convenient. **Climate-friendly bus users are currently often hit by periodic delays due to high levels of climate-unfriendly car use,** despite the provision of bus lanes and bus gates. Bus routes and times are not always convenient, and bus companies should be encouraged to cooperate, among others to provide joint ticketing and the routes and timing that users most need. Evening bus services in rural areas particularly need improvement.

Bus ticket prices are currently too high, and cross-subsidised car use too cheap to incentivise a more significant public transport uptake. Councils need to work with government to reduce bus / train fares. **Over 15 European cities have even made public transport free¹ and thereby revitalised city centres.**



Moreover, **bus stops themselves can become carbon sinks,** following the shining example of Utrecht, the Netherlands: More than 300 bus shelters roofs have undergone a green transformation, each with their new blanket of sedum. The bus shelters were commissioned by ClearChannel - **Leicester is already following suit with bee-friendly bus stops.**²

Applying joined up thinking with theme 3 in particular, action would also be needed to make **bus stops more attuned to the needs of vulnerable groups and increasingly extreme weather conditions.** Especially where bus frequencies are low, bus shelters should **provide adequate rain cover and seating, as a minimum,** for pregnant/nursing women, the infirm and the elderly. We do understand that modern “seating” in bus stops deliberately relies on “*hostile architecture*” to design out lingering and homeless sleeping³. However, on top of being a symptomatic behavioural quick-fix not exactly routed in philanthropy, this design is equally hostile to both the targeted, and **paying, vulnerable**

¹ <https://etiki.com/magazine/mobility/public-transport-is-free-in-these-17-european-cities/> .

² Source: <https://mobilane.com/projects/utrecht-opts-for-eco-bus-shelters-with-green-sedum-roofs/> , <https://www.leicestermercury.co.uk/news/leicester-news/bee-friendly-bus-stops-topped-5462984> ..

³ <https://www.bbc.co.uk/news/blogs-magazine-monitor-27760963> .

customers. The latter pay a disproportionately high add-on price, i.e., aggravated physical (and thus psychological) stress on from the ergonomically hostile “lean-on” structures.



⁴How?→

Another issue which needs addressing to make the city liveable for active and climate-friendly travel, notably pedestrians, are traffic lights’ extremely short green phases, which seem measured on the model of a fit 40-year-old crossing the road. This gives the vulnerable, our youngest and older residents not much of a chance to make it within the rather ambitious, automated time window. We appreciate that the short time windows also cut emissions from cars waiting at traffic lights, but: (1) in the long run, private car use should be disincentivised anyway, (2) **climate change requires the reversal of the obsolete traffic rule “slow defers to fast”**, and (3) this is quite a harsh “solution” inflicted on vulnerable groups, which also makes crossings more accident-prone. To devise inclusive **“8 to 80” cities** (see our comments below on policy option 18), **the length of traffic light green phases has to be re-thought.**

Rail: Restoring dormant lines and other solutions

The option of restoring disused railways, perhaps through Community Rail Partnerships or Light Rail, should be encouraged. The **Oxfordshire Rail Corridor Study (ORCS)** published in July this year⁶, commissioned and funded jointly by the *Department for Transport (DfT)* and the *Future Oxfordshire Partnership*, recommends a number of future improvements to increase interconnectivity across Oxfordshire. Produced by *Network Rail*, with oversight from the *Future Oxfordshire Partnership*, in **collaboration** with industry partners and the **County and City Councils**, the study includes a proposal for a new station at Wantage/Grove, subject to additional main line infrastructure.

Its recommendations have now been drawn together to form **‘Oxfordshire Connect’**, an overarching industry strategy for the county, which will be used to decide future investment priorities, including for the £69 million in funding confirmed by the DfT for the next stage of the *Oxford Corridor Capacity Phase 2 project*⁷. In this context, we **support the East–West railway line, and the proposal for a new station at Wantage/Grove, which must be completed as fast as possible.** Residents have campaigned

⁴ Source: <https://www.morebus.co.uk/world-breastfeeding-week> .

⁵ Source: <https://www.oxford-chiltern-bus-page.co.uk/301005.htm> .

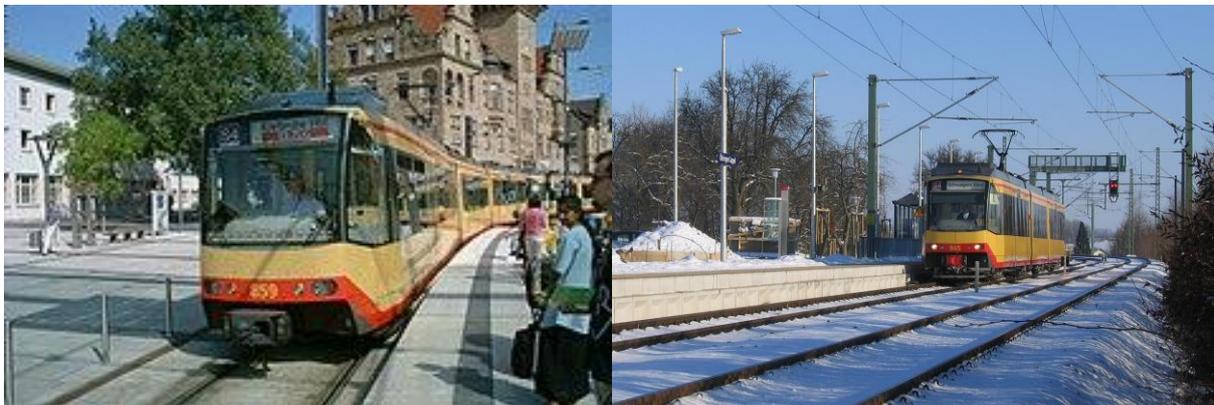
⁶ <https://www.globalrailwayreview.com/news/125871/study-expansion-oxfordshire-rail-network/> .

⁷ *Oxfordshire Connect* will also help to seek future funding through the UK government’s *Rail Network Enhancements Pipeline (RNEP)*.

for over 40 years, petitioning Network Rail to re-open it, for better connectivity and an **alternative to congested roads, which would simultaneously tackle climate change.**

The proposal to reopen the **Witney/Carterton rail line** is worth considering, too, especially the proposal getting the line gets close enough to Brize Norton to make it accessible for travellers to the RAF base. This would take a lot of personnel off the roads and, if the line is strong enough, possibly freight, too. Another advantage would be that (contrary to other dormant lines) the proposal by *Witney-Oxford Transport Group*⁸ does not involve cutting through any existing house estates, but instead tracks the road until it turns south to Carterton. This should mean not having compulsorily to purchase housing/residential land, and should also reduce objections from current residents.

A climate-friendly and “doughnut economics”-type long-term investment are *Dual System Trains*:



*Tram-train running in the streets of Heilbronn City (left), and on the main line in the outskirts (right)*⁹.

The “*Karlsruhe model*”¹⁰ is a **tram-train system**, initially developed and implemented by a German local transit authority (“*Karlsruher Verkehrsverbund, KVV*”). It **consists of tram/light rail trains and commuter/regional rail trains running on the same set of tracks**, generally between or outside of urban areas. Main advantages are

- the elimination of transfer between regional and urban public transport,
- shorter stop spacing compared to regional trains,
- extending existing rail networks into a city without complying with limiting heavy rail legislation,
- relieving platform capacity at large nodes,
- less vulnerable to accidents in adverse weather conditions than, e.g., trackless trams,
- relatively few investments in infrastructure, as tram-train uses existing infrastructure.

The vehicles are more cost efficient in the long term, but in return, require a greater up-front investment than regular trams. Examples of the Karlsruhe model implemented outside Germany include ***Tyne and Wear Metro*** here in the UK, the ***Rijn Gouwel line*** and ***Randstad Rail*** in the Netherlands, ***Athens Metro*** in Greece, and ***San Diego Trolley*** in the United States.

⁸ <https://witneyoxfordtransport.org.uk/> .

⁹ Source: https://en.wikipedia.org/wiki/Karlsruhe_model .

¹⁰ https://en.wikipedia.org/wiki/Karlsruhe_model .

Plans for replicating the Milton Keynes mass rapid transit or the Cambridgeshire autonomous metro have been getting some interest, as have **trackless trams**¹¹ using a dedicated tram/bus lane, which could run along the A40. However, whether trackless trams are an option depends on the exact local conditions, and there are a number of major concerns¹² indicating that in the long run, trackless trams at least may not be a cost efficient alternative:

- Systems can be unreliable and some have already been replaced, such as a magnetically guided busway in Eindhoven in the Netherlands;
- Not many different trackless tram systems exist, and they tend to use proprietary technology, creating a technology lock-in to a single supplier (with price implications): whether that supplier/technology will still exist when it is time to replace the fleet, is uncertain - whereas with regular buses/light rail, there is competition between multiple suppliers to choose from;
- Depending on the design of the road, buses driving over exactly the same spot multiple times can create rutting, resulting in poorer ride quality and more expensive repairs;
- Trackless trams have a lower capacity per vehicle than light rail, meaning more are needed to meet the same demand levels. More frequent service can only address this up to a point, which, when exceeded, loses benefits, for instance signal priority may disappear.

To integrate buses and trains with active travel, a network of transport hubs is needed. Bus stops as well as railway stations need cycle parking and easy pedestrian access. Hubs can also be used for transferring freight to cargo bikes or light goods vehicles, which would make more Low Emission Zones possible within urban centres. For both buses and railways (*“Rail & Ride”*) to truly function as hubs, both must provide **for adequate and realistic storage for bicycles, (e-)scooters and other active travel means.** **Current policies and capacity in Oxfordshire are not even getting close to being ready for the climate emergency,** with trains often providing only a tiny compartment for bicycles, while providing no space for pushchairs:



Available space in a typical bicycle compartment on a local train¹³.

Available space in a typical bicycle compartment on a local train¹³.

¹¹ <https://theconversation.com/trackless-trams-v-light-rail-its-not-a-contest-both-can-improve-our-cities-125134> .

¹² <https://www.greatauckland.org.nz/2020/08/06/what-are-trackless-tram/> .

¹³ <https://www.theguardian.com/lifeandstyle/bike-blog/2019/nov/04/rail-companies-bike-policy-bicycle-storage-trains> .



“RegioBiking”:

bicycle coaches on a regional train in Austria¹⁴.

Bus companies are operating similarly climate-inappropriate policies when it comes to storing bicycles or pushchairs, partly due to a failure to design buses fit for the climate emergency. **The types of buses we have in and around Oxford are currently a barrier to bikes, pushchairs, and wheelchair users. Articulated (bendy) single decker buses can provide more space.**

Transport hubs at main route bus stops and rail stations should be fit for the 21st century, and allow safe storage of more expensive vehicles such as electric bikes. **Current best practice is in evidence on Walton Forest, London¹⁵.**

• Policy option 18 - Sustainable Transport in New Development

We welcome the draft’s uptake of 15-minute neighbourhoods - for rural areas, 20 minutes may be more expedient – and fully agree that individual and collective **transport choices are a result of how development and infrastructure are planned**. The importance of this insight can hardly be overstated, and needs to be implemented in **designing out car dependency in new development** – a helpful checklist for this is available from *Transport for New Homes*¹⁶.

We welcome the insight by the *House of Commons Science and Technology Committee* that current fiscal incentives for cars are not sufficient to encourage consumers to purchase lower, and indeed, zero-emissions vehicles, and that “(...) **In the long-term, widespread personal vehicle ownership does not appear to be compatible with significant decarbonisation**¹⁷.” Identifying what does not work is

¹⁴ Source: <https://nationaler-radverkehrsplan.de/de/aktuell/nachrichten/neue-fahrradwagen-mit-je-24-stellplaetzen-fuer> .

¹⁵ <https://enjoywalthamforest.co.uk/get-moving/cyclehubs/> .

¹⁶ <https://www.transportfornewhomes.org.uk/the-project/checklist-for-new-housing-developments/> .

¹⁷ *Clean Growth: Technologies for meeting the UK’s emissions reduction targets: Government and Ofgem Responses to the Committee’s Twentieth Report of Session 2017–19 - First Special Report of Session 2019*, House of Commons Science and Technology Committee, 1 November 2019, p.18, point 30; see <http://publications.parliament.uk/pa/cm201919/cmselect/cmsctech/287/287.pdf>; see also <https://www.bbc.co.uk/news/business-49425402>.

the first, much needed step. What we need now, to successfully face the climate challenge, are positive counter-proposals creating a pull factor towards desirable outcomes.

One such outcome is pedestrianised towns - which we must fully embrace, and fast. These have long been an urban planning trend with our European neighbours, who are boasting very positive success stories. **Pontevedra**, for instance, is a particularly shining example: “(...) *The benefits are numerous. On the same streets where 30 people died in traffic accidents from 1996 to 2006, only three died in the subsequent 10 years, and none since 2009. CO2 emissions are down 70%, nearly three-quarters of what were car journeys are now made on foot or by bicycle, and, while other towns in the region are shrinking, central Pontevedra has gained 12,000 new inhabitants. Also, withholding planning permission for big shopping centres has meant that small businesses – which elsewhere have been unable to withstand Spain’s prolonged economic crisis – have managed to stay afloat*¹⁸.”

“How can it be that the elderly
or children aren’t able to use
the street because of cars?”

César Mosquera, Head of
Infrastructure, Pontevedra



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¹⁸ As one example, see <https://www.theguardian.com/cities/2018/sep/18/paradise-life-spanish-city-banned-cars-pontevedra> .

¹⁹ Source: <https://www.theguardian.com/cities/2018/sep/18/paradise-life-spanish-city-banned-cars-pontevedra> .

In the UK, **Bristol's** Council officers began work on further widening pedestrian zones last spring, restricting a major route for vehicles through the city centre, and drawing up plans to widen pavements to help physical distancing and improve cycle routes across the city. Bristol's Mayor sees the pandemic as chance to change travel habits and revitalise the city:

*"(...) It's important that"(...) as people begin moving again en masse **they don't go back to patterns that are 15 to 20 years out of date.** (...) We're trying to rebuild the city in a way that's fit for (...) **taking on the challenge of Covid** (...) but also dealing with the wider challenges of **social inequality, social immobility and climate and ecological emergencies.** We are in a crisis but we need to think about the **medium and long term** as well²⁰.*

A **community-led initiative in Redcliffe**, inspired by places across the world (e.g., the public space around *Bath Abbey*, *New York's high-line*, or *Berlin's Baugruppen* custom-built apartment blocks), is reclaiming underused space and puts people and quality design at the centre.

The initiative has set out a Neighbourhood Development Plan with many ambitious features, notably **integrating green infrastructure into the building and public realm**, including green roofs, energy and water, and meeting social needs by implementing "8 to 80" features (see further below), making the landscape more playable for all ages.

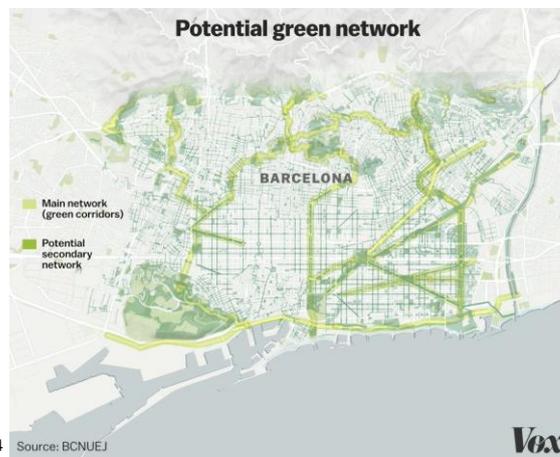


²⁰ <https://www.theguardian.com/uk-news/2020/may/21/bristol-reveals-plan-to-pedestrianise-historic-centre-in-covid-19-reforms> .

²¹ Source: <https://www.redcliffeforum.org/> .

An example where stepping up pedestrianisation has made it into the law is the federal state of **Berlin**: It was the first German Bundesland to adopt a “**pedestrian law**” in January this year. A new, pedestrian-focused amendment²² to Berlin’s regional mobility law from 2018 – initially focusing on improving traffic/safety conditions for cyclists - was passed with the support of the three-way governing coalition of Social Democrats (SPD), the Left and the Greens, as well as the business-friendly Free Democrats. The policy change is to redress the systemic asymmetry of the **traffic rule "slow defers to fast"**, imposing an incentives structure pre-dating the climate emergency. The new law pushes the **city's transformation** from car-first, **to pedestrian-first**, to improve quality of life for all citizens; and includes improvements such as longer green lights for pedestrians, safer school routes for kids, more crosswalks, more benches for older people and others in need of a rest along their route, curbs to be lowered to make them more wheelchair accessible, construction sites to ensure that pedestrians and cyclists can safely navigate around them, and city authorities are to crack down harder on illegal parking and dangerous driving.

Barcelona’s heavily polluted central **Eixample** district is now subject to an ambitious 10-year plan to reclaim the city’s streets from cars, and cut down pollution. Under this scheme, giving priority to pedestrians and cyclists, **one in three streets** are becoming **green zones**, and 21 public squares will be created at intersections, so that **no citizen is more than 200 metres from a square or small park**²³.



24 Source: BCNUJE

Vox 25

It is high time for us to catch up. **Fully embracing green, pedestrianised cities** would solve more than one problem at a time - **simultaneously addressing air pollution, sustainable urban infrastructure, accident and flood prevention**²⁶, **building carbon sinks and healthy communities.**

²² <https://www.dw.com/en/berlin-gets-germanys-first-pedestrian-law/a-56480003> ,
<https://www.zdf.de/nachrichten/panorama/berlin-fussgaenger-gesetz-100.html> .

²³ <https://www.theguardian.com/world/2020/nov/11/barcelona-launches-10-year-plan-to-reclaim-city-streets-from-cars> ; *Eixample* is the famous 20th-century grid in Barcelona devised by engineer *Ildefons Cerdà*.

²⁴ Source: <https://theconversation.com/sustainable-cities-after-covid-19-are-barcelona-style-green-zones-the-answer-150774> .

²⁵ Source: <https://www.vox.com/energy-and-environment/2019/4/10/18273895/traffic-barcelona-superblocks-gentrification> .

²⁶ <https://www.theguardian.com/world/2020/mar/16/how-helsinki-and-oslo-cut-pedestrian-deaths-to-zero> .

“8 to 80” Cities²⁷

In order to be sustainable, transport needs of all age tranches must be taken into account, and one of the most difficult questions facing urban areas is how they will go about making themselves more age-friendly.

To begin with, there should be more accessible surface transit, improved cycling and pedestrian infrastructure, and more programmable park space. However, in many aging societies where the proportion of seniors will grow as much as four-fold within two decades, public space improvements alone will not suffice to make large urban areas more suitable to the needs of older residents, especially in the case of car-dependent suburbs.

In Japan for instance, where the aging curve is further along, planning officials and architects have promoted “**universal design**” principles, which can be found in such amenities as multi-generational housing, to address the shortage of caregivers.

In a 2009 study²⁸ of age-friendly cities, the *Ontario Professional Planners Institute* recommended governmental collaboration to develop **community “hubs”**, housing a **range of services under one roof**. Government agencies were also urged to intentionally integrate (rather than segregate) age-related services, such as seniors’ drop-in centres and child-care facilities, as has been done successfully in several Scandinavian countries, Canada and Singapore²⁹, and in 2018 for the first time in the UK, in *Nightingale Centre Wandsworth*:



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²⁷ <https://www.880cities.org/>.

²⁸ <http://www.ontarioplanners.on.ca/pdf/call%20to%20action%20age-friendly%20communities%20june%2018,%202009.pdf>.

²⁹ <https://ideas.ted.com/whats-a-nursing-home-combined-with-a-childcare-center-a-hopeful-model-for-the-future-of-aging/>.

³⁰ <https://www.independent.co.uk/news/uk/home-news/elderly-children-intergenerational-care-home-nightingale-house-a8271876.html>.

Finally, we agree with the hierarchy the policy option proposes, but we believe the Plan’s vision should not be limited to merely “enabling” people to travel by active and sustainable means (although this is a key first step), but **beyond that, should create powerful incentives for active travel**. This also includes removing any disincentives, including addressing air pollution, which has a more damaging health impact at higher metabolic rates.

• **Policy option 19 - Supporting Sustainable Freight Management**

As much freight as possible should be transported by rail. We would very much support a network of cargo bikes and zero emission vehicles for local deliveries, along the lines of *Pedal and Post* in Oxford, with transfer hubs at railway stations and on the outskirts of urban centres. There could be an opportunity here to repurpose empty commercial units on the outskirts of towns.

The proposed EV charging infrastructure should also of course provide for goods vehicles as well as cars. We welcome, for example, initiatives such as the *Energy Superhub Oxford*³¹, which aims to use battery storage to power a network for electric vehicles and electric heating for homes and businesses.

Overall, we are somewhat disappointed by this policy option, and would urgently call for more ambitious measures with regard to sustainable freight management. In particular, we would like to see take-up of ‘last mile deliveries’ in the policy, and the reinforcement of cargo bikes as delivery options.



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• **Policy option 20 - Digital Infrastructure**

There is an important transformation in life and work taking place in society, thanks to the impact of the Internet. It started in 2000, but has accelerated during the Covid-19 pandemic. It is changing:

³¹ <https://energysuperhuboxford.org/about-the-project/> .

³² Source: <https://www.velove.se/overview>

1. **Where we work.** Many people no longer need to commute daily to London or Oxford for office jobs. Much of that kind of work can be done anywhere there is a good Internet connection.
2. **Shopping.** We order online and wait for the delivery. Town centre stores are closing, warehouses expanding and courier jobs are increasing.
3. **Public services.** Residents book services online, talk to their GPs over the phone and then meet in person only when it is necessary (and indeed possible).
4. **Socialising.** Even (or especially) the elderly have spent the last year communicating with friends and relatives online, countering to some extent the effects of social isolation. While younger people integrate online and face-to-face communications in their lives.

An increase in automation can deliver some results, as for instance in *Oxbotica's* self-driving cars and number plate recognition (products of machine learning that is sometimes called AI). But we should be mindful of the resulting carbon foot print, and the role increased automation plays in “delivering” social isolation, too.

Many of the digital infrastructure changes will have a beneficial impact on people and the environment in Oxfordshire, such as:

- **Making it possible to work from home in rural villages** rather than driving cars to Oxford and London, and set up new rural businesses;
- **Increased business start-ups**, competing with Belfast³³, relying on good Internet connections outside Oxford where office and housing rents are too expensive for new businesses;
- **Distribution of goods by bicycle and electric vehicles for Internet orders**, instead of driving to shopping centres;
- **Online co-ordination of social and business services** to better meet the needs of residents; and
- **Reduced social isolation** among the elderly and vulnerable, as shown in the *Digital Donnington*³⁴ project, supported by Oxford City Council.

To ensure that the benefits of these changes reach everyone, we need to do far more than has been proposed in the *Future Telecoms Infrastructure Review*³⁵. For commercial reasons, Internet Service Providers and Mobile Network Operators concentrate on areas with high population density. **Targets set as a fraction of population, such as 85% full fibre discriminate against people in rural areas.**

Government and local authorities have had to deliberately support rural connectivity. To quote the example of Northern Ireland, different providers in rural areas have received funding to set up microwave links to a village, and build wired Internet connections in the village. In Romania, the mobile

³³ <https://www.seedtable.com/startups-belfast> .

³⁴ Oxford City Council awarded £35,000 in grants to community groups as part of a #WeAreOxford campaign, to help connecting communities beyond the pandemic. *Donnington Tenants & Residents Association (DTRA)* received funding for its project to connect older, isolated members of the community online, https://www.oxford.gov.uk/news/article/1776/council_boosts_community_activities_with_weareoxford_grant .

³⁵ <https://www.gov.uk/government/publications/future-telecoms-infrastructure-review> .

networks are so good that **on a boat in the Danube delta³⁶, there is better connectivity than in parts of Oxfordshire**. This requires local investment from both the private and public sectors.

To improve rapid access to the possibilities of a better digital infrastructure, it is not enough to provide technical connectivity: people need support to change the ways they work and live.

• Policy option 21 - Strategic Infrastructure Priorities

The Oxfordshire Infrastructure Strategy, at least in its stage 1 plan, falls disappointingly short of the radical vision needed to transform our County in light of the Climate Emergency. The reason given for this is that the plans pre-date the declaration of a Climate Emergency in 2019 and recent climate action frameworks.

Inaction in the face of a looming threat is inexcusable and does **not meet the responsibility that Oxfordshire LAs have towards their citizens**. We should not sit back and wait to be **taken to court over failure to act**. As mentioned under policy option 12, in the context of *air pollution*, there is now a **precedent for failure to address excessive air pollution being officially established as a contributory cause of death**. In the landmark case mentioned above (*Ella Kissi-Debrah*), the coroner concluded that “(...) *There was a recognised failure to reduce the levels of nitrogen dioxide*” and that “(...) *Ella died of asthma, contributed to by exposure to excessive air pollution³⁷*”. **The coroner’s report is a clarion call for urgent and far-reaching action to redress the consequences of planetary overshoot.**

Specifically with regard to strategic infrastructure priorities, this means that there is an urgent requirement to redress the lack of infrastructure plans allowing for a socially just transition to a pollution-free, net zero carbon future.

A better framework is urgently needed to provide proper green infrastructure, not just walking and cycling routes, but also access to nature for all residents. The new government carbon pricing should help this shift, but it should happen sooner than the planned OXIS part 2.

The OXIS stage 1 plan is self-reflective of the **infrastructure shortfall and the funding gap** for existing plans, making it puzzling that changes in priority to address this have not been included. The overall focus on growth is misplaced, and does **not support the ambitions of the draft Oxfordshire 2050 plan**.

Given that the OXIS and the Oxfordshire 2050 plans must go hand in hand, we hope that priority will be given for infrastructure projects addressing the Climate Crisis and Oxfordshire’s socioeconomic inequalities in the OXIS’s stage 2 plan, as well as in the framework of the Oxfordshire 2050 plan.

³⁶ This may in part be due to the NATO context: <https://jamestown.org/program/romania-danube-flotilla-an-unparalleled-capability-on-natos-southeastern-flank-part-two/>.

³⁷ <https://www.bbc.co.uk/news/uk-england-london-55330945>.