Draft Orders and Environmental Statement - A720 Sheriffhall Roundabout scheme

By email to: a720sheriffhallroundabout@transport.gov.scot
Sent 29/01/20

Objection from Transform Scotland

We would like to make the following representations in response to the statutory consultation on the above project. We do not intend to comment on the details of the proposals, rather set out arguments relating to the overall scheme as a matter of principle. We object to the scheme on the following grounds.

1. Effectiveness

Evidence collected over many decades shows clearly that major road schemes ultimately prove to be the victims of their own ‘success’. This phenomenon has been known to transport planners since the 1930s but was clearly identified as ‘induced’ traffic in the report published in 1994 by the Standing Advisory Committee on Trunk Road Assessment, which concluded that ‘[a]n average road improvement, for which traffic growth due to all other factors is forecast correctly, will see an additional [i.e. induced] 10% of base traffic in the short term and 20% in the long term.’

The M25 around London and the new Queensferry Crossing are just two examples amongst many. A mere 18 months after its completion in 1986, the M25 orbiting London had reached the traffic flows expected in 2000. Closer to home, the Queensferry Crossing has greatly increased traffic over the Forth compared with that across pre-existing bridge and one million extra journeys have been made over it in the last recorded year, despite a pledge from Transport Scotland that any increased cross-Forth travel would be made by public transport.

The benefits of moving traffic more quickly across the Sheriffhall junction into the already congested outskirts of the City of Edinburgh are also questionable.

2. Opportunity cost

This project comes with a huge opportunity cost. The £120 million could, and should, be spent on investment in public transport, walking and cycling. It would have a much more positive impact if used, for example, to extend the tram system across Edinburgh; create a dense network of urban cycle paths such as those found in the Netherlands and Denmark; reduce the cost of public transport; and close city centre streets to general road traffic for the benefit of pedestrians.

The consultation material makes mention of consultation with non-motorised users to ensure that provision for all users is incorporated in the proposed scheme. While the provision made may be an improvement on what exists at present, any benefits will be overwhelmingly outweighed by the harm caused elsewhere. These benefits could equally be provided in a much cheaper and more sustainable manner.
3. Climate Emergency

Thirdly, and most importantly, there is the most pressing problem facing humankind, namely climate chaos.

We know from the landmark report by the UN Intergovernmental Panel on Climate Change (IPCC) that urgent and unprecedented action is needed to reach the targets set to avoid catastrophic climate change. In the light of this, the Scottish Parliament has declared a climate emergency and pledged to lead by example by cutting carbon emissions. Similarly, The City of Edinburgh Council has committed to becoming carbon neutral by 2030.

We also know that the basic rationale for this project is ‘the need for grade-separation at Sheriffhall roundabout [which] was initially identified in the Strategic Transport Projects Review (STPR) in 2008’, but that perceived need was identified over 12 years ago, well before the Scottish Government’s decision to respond meaningfully to climate change.

It is an established fact that there has been a failure to reduce emissions in transport in Scotland for 30 years — and recent years have seen a renewed growth in emissions. Projects such as Sheriffhall will merely reinforce that trend and embed increased emissions and pollution for years to come. The only way to reverse this trend is to change policy on the provision of road capacity and switch funding to sustainable alternatives which will have the effect of reducing, rather than increasing, emissions.

Conclusion

In the long run, this project will fail the desired objective of reducing congestion. The money required to fund it would be better spent on transformative actions to decarbonise transport, which accounts for over one-third of Scotland’s greenhouse gas emissions, and it, and any similar projects, will seriously undermine the Scottish Government’s declared climate targets.

Consequently, we object very strongly to this project on the grounds set out above and recommend that the Scottish Government instead reconsider its commitment to taking forward the design and construction of the scheme.