

*The Scottish Rights of Way and Access Society*

**PAPER FROM SCOTWAYS ASSESSING MATERIAL IN THE ENVIRONMENTAL STATEMENT RELEVANT TO OPEN-AIR RECREATION**

**Introduction**

1. This paper sets out observations from the ScotWays witness on some selected parts of the Environmental Statement (and the developer's access plan) that bear on ScotWay's evidence on open-air recreation. In this analysis, only limited reference is made to impacts on the Cairngorms National Park, because the Park Authority is a main party to the inquiry; likewise for open-air recreation interests in and around Tomintoul/Glen Livet where there is a strong effort to promote open-air recreation.

**Market Research Surveys**

2. **Surveys of attitudes to wind farms** The developer makes much in the ES (Chapter 21) of its own survey of tourist visitors and it refers to other similar surveys to argue that effects on tourism will be limited. Wind developers often pray-in-aid surveys that aim to document public support for wind farms, either in terms of public preference or of there being no economic consequences for the local tourism industry. While these surveys claim to reflect public opinion, as captured at the time of survey, they have limitations, either technical or conceptual, as argued below. There are five reasons why such claims should be set aside or treated with caution.

- First, this is a topic of survey (opinion on wind farms and their impact on scenic values) for which there can be no settled opinion: very large and unusual structures are being erected in increasing numbers in settings where development of this scale would not have previously been readily consented, and there clearly is a challenge to and uncertainty in public opinion over their effects on amenity. This uncertainty is fuelled by the heavy publicity for climate change and the dynamic nature of debate on this matter. Without doubt, a proportion of the population do and will continue to like wind turbines, and there is good public support for renewables generation, but surveys can often show a good proportion of interviewees in the no-strong-view/uncertain/neutral response categories, which, when added to 'don't know' responses is indicative of an unsettled opinion in this evolving issue.

- We have yet to see the cumulative effect of increased development of wind power ahead, as the present (and lengthening) queue of wind development proposals reach consent and construction. So surveys of this kind are fuzzy snapshots of opinion (at the time of survey) that cannot be depended on for judgments with longer-term implications. Even if one agreed with interpretations of survey data that the effects of one wind farm would be negligible, assertions to this end have to be tested against the wider context of the growing cumulative impact of many such developments. There is a close analogy here with hydro-development in the Highlands in the 1950-60s, for which it took time and growing experience of the impact of hydro schemes to understand their seriously damaging consequences to Scotland's scenery (and also to habitats), and for this to be recognised by informed opinion, and eventually acted on.
- Many of the local surveys (as set out in the Dorenell questionnaire) have questions that have an inevitable simplicity, in that the respondents are faced with a site name and location for which they are unlikely to have any pre-knowledge; for which it is most unlikely (say at Dorenell) that there will be any direct personal experience (given its isolation and that most respondents are from outwith the area); about a development that is not yet in place; and on which respondents, even with some pre-briefing, on what is inevitably a complex set of information, can have only limited perceptions about the nature, scale and potential impact of the proposal.
- Some of the market research surveys explore whether respondents will be sufficiently deterred from making return visits (ignoring the reality that a proportion of tourist visitors will inevitably be once-only customers). Inquiry of this kind explores speculative areas of future behaviour for a matter (will the respondent return) that will inevitably be governed by a wide range of factors, such as experience of past visits; cost and quality of services; value for money; and exchange rates; the draw of local social or family connections; or alternative holiday options. Disaggregating from all of these factors whether a wind farm will make the difference is quite uncertain. But this is asking the wrong question. It would be better to explore the degree to which encounters with wind farms affect the respondents expectations of their visit, or their image of Scotland: even these are difficult opinion questions for which responses would have to be interpreted with caution. But tourism marketing sells images and expectations of Scotland,

and failure to deliver on the expectation is what we need to know about.

Discontented visitors tend to slip away silently, to spread damaging word of mouth messages.

- Claims are made (on the return-to-visit responses) that the economic consequences for tourism are negligible or modest. It is a cynical argument to imply that the impacts have to be proven through measurable loss in income from tourism, because the dynamic of the tourism economy, both nationally and locally, is influenced by a wide range of domestic and international factors, such that a direct and measurable correlation between levels of visits and tourism income would not be clear until very serious damage to Scotland's scenery had been done. Attempts to calculate overall national estimates of future losses to the tourism economy on the basis of speculative responses on return visits don't make practical sense.

3. In addition, many of these local surveys are of an ad hoc nature, lacking in their reports any of the basic information that one would expect from a market research study, such as sampling procedures and structure, and lacking sufficient information to confirm that the survey adheres to Market Research Society standards. Even the wind industry 'survey of the moment', the Caledonian University study for government (CD/R/1) is moved (3.7) in its general conclusions on its wide-ranging review of existing surveys to state that: *"Most of the literature surveyed has not been refereed or formally published. Some of it is best described as advocacy; some of it rather poorly conducted opinion surveys"*.

4. **The developer's local survey** In the ES, the developer leans on its own local survey to assert that the development will have no material effect on tourism (and by implication on enjoyment of the countryside by visitors). This local survey appears to have some of the usual limitations of ad hoc surveys (the survey sampling structure being not available). From what is available, it does appear fair to comment as follows:

- the sample size is small, but some of the reported data on its structure suggest that it is a bit uneven (for example, the proportion of overseas visitors is rather high, possibly on account of an emphasis on distilleries as sampling sites; likewise the proportion of day visit trips is high, although the weekend time of survey will

- have contributed to this latter bias and, correspondingly, the number of visitors from south of the Border is low, surprising for a bank holiday weekend);
- the survey is particularly open to the concern (mentioned above) that awareness of the site will be extremely low, given its isolation – pointing at the development location on a map (as described in the questionnaire, is a rather simplistic approach) – Dorenell is not the known name of the hill and was not even on the former 1” maps; and
  - responses to the re-visit question (Qn.14.5) are not convincing, in the huge proportion opting for the neutral response – nor is the confident interpretation of this response justified.

5. **National surveys of attitudes to wind farms** There is a range of more-than-local surveys that explore attitudes to wind farms, some which are well-structured and truly national surveys, some conducted on a national basis, but still dealing with local data. The ES refers to two of the most cited surveys in the second category – the MORI survey of *Public Attitudes to Windfarms* 2003, and the more recent Caledonian University study on *The Economic Impacts of Wind Farms on Scottish Tourism* 2008 (CD-R/1). Both surveys are official responses to strongly articulated local concerns about wind development: also, in part, they were a challenge to the earlier VisitScotland-NFO System Three study of *Tourist Attitudes to Wind Development*<sup>1</sup>, which in my opinion is still the best constructed assessment of this research theme, because it engaged respondents in a structured process of raising awareness of the issues, rather than gather snap responses by standard interview technique: it has some limitations in being an older survey with a small sample.

6. Of the two main surveys mentioned above, the 2003 MORI study is a professionally conducted survey with a fair-sized sample overall, but with respondents drawn from populations local to ten existing wind farms, to assess their opinions from their experience of their local wind farm. But it is a telephone survey with a low response rate, and there are assertions by critics of wind development that the sampling frame is such that few respondents live close to the study wind farms,

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<sup>1</sup> *By NFO System Three, for VisitScotland, Investigation into the Potential Impact of Wind Farms on Tourism in Scotland, 2002, which was repeated in Wales (2003) in similar format, both cited in the ES. Both are experimental studies in the depth to which they engaged the respondents in the subject of survey, but have small samples that do not justify the degree of detailed analysis made of the data, Both are now a bit dated. Results from this piece of research give more comfort to those opposed to wind farms than more recent studies. This survey is sometimes (wrongly) criticised about the deselection of certain categories of visitors from interview, but this misunderstands the experimental purpose of this study, which was to research the views of visitors here primarily to enjoy Scotland's beauty*

with 89% of the sample in the outer 10-20 km distance from their local site. The 2008 Caledonian University study is ambitious having several components, from an initial wide-ranging literature review, on to on-site interviews of visitors and internet surveys, followed by economic modeling of the likely economic outcomes based on the survey and other information. These two studies are just too complex to assess here but, each has significant limitations and whatever their merits and demerits, each has to be evaluated against the factors set out in para 2 above.

**7. *Values for Scotland's scenery*** Finally in this section, there is ample good quality survey data that attest to the significance of Scotland's scenery to the tourism economy, as the main factor that draws people to visit this country, especially north of the Highland edge. These data have emerged as responses to general tourism surveys over decades, and from more specific recreation surveys, and it is astonishing how readily these data are just set aside in this debate. Through being the prime attraction for visitors, fine scenery has significant economic benefits for society, especially in the remoter parts of the country. However, the recreation community would set aside assertions that scenery itself can be sensibly valued in an economic sense: its importance to them is that their engagement with natural beauty is an expression of human values, and that the beauty of our land has an intrinsic worth to society that rises far above claims to monetary value.

## **Landscape and Enjoyment**

**8. *The link between scenery and enjoyment*** The quality of Scotland's natural heritage – principally its scenery – is of very high importance to the public's enjoyment of open-air recreation, and is often at the heart of what gives an area recreational value. The qualities that people enjoy as part of this recreation are often closely linked to the character of the landscapes they are visiting. I will say some more about this in my precognition: this part of this paper offers my assessment of the way in which the ES addresses landscape and related matters that impinge on or connect with the recreational interest.

**9. *The ES landscape appraisal*** Assessment of the effects of the development proposal on its adjacent and wider setting uses the conventional LVIA methodology, which centres on the effects arising on the resource – the character of the landscape – also on the visual effects arising locally and at wider distances. The assessments

of change cited in the ES for the appropriate landscape character areas immediately adjacent to the development site (Moorland and Forest, and Simple Upland Plateau and Hills) are that, when in operation, the wind farm would cause high landscape change and the impact would be substantial. These are assessments we can agree with, if only on common sense grounds, given the exposure of the site, the scale of the development and its elevation – but the language of assessment used here, even as explained in the introduction to Chapter 9, does not do justice to the domineering nature of the effects that would be experienced within proximity to the proposed site.

10. The visual assessment is in part dependent on the ZTV maps. As might be expected for hilly countryside, which is dominated by ridges and basins, the predicted visibility varies a lot according to the ups and downs of the terrain, but two features stand out from the overall ZTV map (Fig 9.4): first the strong north-east trend of visibility on higher ground, which arises from the general northeast-southwest trend of the underlying geological structure in this part of Scotland (but this is lost to the south over the Cairngorms granite massif); second is the degree to which the development is potentially visible from considerable distances from somewhere on almost all elevated terrain – a consequence of the high elevation of the proposal. It will also be visible on lower terrain, although it follows that for lower level recreation opportunities, particularly those in sheltered woodland or plantations, the development will not often be visible, but it would be wrong to extend this to an assumption that the development would have no impact on people taking recreation on low ground: inevitably they will see it locally, and when moving around the area will have some sight of it. However, the substantive effects will fall on people either visiting open land for their recreation, both in an inner zone closer to the site, or elsewhere on higher ground.

11. **General points on visual effects** The analysis includes the usual assessments made from a selection of viewpoints, chosen as being in some way either representative or distinctive locations from which the effects of development would be experienced by significant numbers of people, and the analysis concludes with an assessment of the cumulative effects arising from other wind developments in this part of Scotland, and some overall summary comment. ScotWays cannot repeat the survey work leading to these assessments, nor can we comment on it all and we have a perspective driven by the interests of people using the area. But we have several general concerns about this kind of assessment.

- First, in the general conclusions, (para 9.863 *et seq. of the ES*) there is an implicit downplaying of the impacts of the effects over a wide area around the site of the proposed development – see the arguments to suggest that it will have beneficial landscape effects (para. 9.865); there is emphasis in the text on the viewpoints analysed, and the small number of them affected at a significant level, which elides the reality that these viewpoints are not the whole story (para 9.869 and repeated at 9.878 for cumulative effects and at 9.882); and the emphasis on how well the design has been pursued (para 9.882) glides past the harsh reality of the real impact.
- Inevitably, the site is not going to be visible from a good number of locations according to local terrain, elevation and land cover; it may be either not noticeable or particularly prominent, according to varied conditions of lighting, according to time of day, or atmospheric conditions either reducing or enhancing the long view. But any implicit averaging out the effects is not justifiable – no-one can see or experience the average, and this approach particularly diminishes the gross effect, especially in proximity to the site itself, and other adjacent places where the effects will be seriously damaging to the beauty of this part of Moray. It is quite wrong to argue (para 9.885) that the cumulative outcome is that Dorenell would associate with the larger wind farms to the northwest. The purpose of assessing cumulative impacts should be to analyse what extra impacts and issues arise, rather than assert that the new impact would fit comfortably with what damage has already been done to the landscape.
- From the recreational stance, the emphasis in the LVIA methodology on objectivity in relation to place and visual effects does not properly encompass what is important to people – especially, but not exclusively, those using the area for recreation – which is the emotive and intangible experiences of enjoying the outdoors: this is what underpins to the recreational value of the land which will be developed and its surrounds. These effects may be less dominant at a distance and less arousing of strong emotive responses, but they challenge the recreational experience in other ways, mentioned below.
- There is a tendency in the analysis (for example at paras 9.175 and 9.177) to describe the visual effect of the proposal, when experienced through big views from high ground, as being just one element of the wider panorama, especially where that panorama includes a range of diverse man-influenced elements. This

may be a conventional analysis from a design perspective, but it does not accord with the common sense expectations of the recreational visitor. Whatever the composition of the foreground view as seen by people ascending any hill – and the view from the top is the reward, the goal of those who make the effort – the expectation is of an ascending gradient of reduced human influence, and this is the wider expression of the experience gained through the climb. A heavily engineered moving structure on high ground of natural character is patently discordant and out of place. These are objects that do not just fit in to the wider scene: they are eye-catching and obtrusive and damage the beauty of the area.

**12. Viewpoint hills** There is a number of well-visited viewpoint hills relatively close to the development site, many with a westward aspect towards high ground as their main attraction. Others such as Ben Aigen or Ben Rinnes have commanding all-round views that are already affected by wind development. Some of these hills are more for the serious walker, others attract a wider range of walking and family groups: and some are well-regarded destinations for the local community. Other hills that will be affected will have fewer visits, which is not to devalue their importance to those who visit them. The analysis broadly sets them into three groupings, and this approach is followed below.

- First, there are some well-visited hills that are relatively close to the development site, some of which have been viewpoints in the formal landscape analysis, notably: Ben Rinnes, Corriehabbie Hill (which is closest of all, and curiously it is barely mentioned in the ES – except impliedly at para 9.178 – and where the impact will be serious), and Carn Mor (of the Ladder Hills), all of which are Corbetts. (Cook's Cairn itself was listed as a Corbett in the Munros tables until the early 1980's, apparently demoted on OS re-survey). To these higher hills close to the development, we have to add The Buck, other tops at the northern end of the Ladder Hills, and the perhaps less visited hills southeast of Dufftown. The ES viewpoint assessment of hills in this category notes that the effects will be significant. We would add: '...and a serious devaluation of the recreational experience'.
- In the range of visited viewpoint hills a further away from the development site there are Tap o Noth, the Balloch, the Cromdale Hills, the Correen Hills, Ben Aigen, and other viewpoint hills to the east. Viewpoints within this zone that are assessed in the analysis are given impact ratings of slight or low or medium: at

distances of up to ten miles. That may be judged optimistic; indeed the accompanying photographic representations must under-rate the impact (as is normally the case). Again it is counter-intuitive to imply that the diversity of features on intervening land somehow mitigate the impact of very prominent constructions on hill-tops: those who lift their eyes to the hills literally do that, with reasonable expectations of an unsullied scene.

- The same understatement of effect can be seen in accounts for more distant viewpoints – say Morven, or the western end of the Bennachie ridge. Clearly at these greater distances, the development will be much less prominent, but the sharpness of visibility, and the clarity and direction of natural light at the time may become dominant factors in determining what can be seen. Modern turbines are striking objects, these are turbines at the top end of the height range used on terrestrial sites, and an obtrusively located wind development in the right lighting conditions – say in low-level evening light – can be a notable feature at significant distances. At these more distant locations, the horizon becomes a more important element of the landscape in limiting the view and acting as a focal point in it.

13. **Local landscape designations** We cannot accede to the overall assessment that the impact on the local AGLV (para 9.821) will be moderate: inevitably there will be areas within the designated area where the development will either be not visible or partially screened, while in other areas, it will be a substantial feature as displayed on the ZVT maps. The essence of a designation is that it aims to protect a defined-area landscape considered to be of merit. Much is made in this section of the effects of other existing wind farms on the AGLV – surely it cannot be acceptable to argue that other detractors (outwith the AGLV) help to provide justification for a major new impact within the designated area. It is also false logic to argue that the effects of a new and major detractor on the AGLV can be averaged out on a taken-overall basis; and it is wrong to submit that a designated area can be subject to a process of attrition of this kind – its purpose is to safeguard the whole area; and it is misleading to imply that there are no serious impacts, given the high proportion of the southern part of the AGLV within the zone of close visibility to the proposed development site.

14. **Wildness** The landscape section of the ES considers the implications of the SNH policy statement on *Wildness in Scotland's Countryside*. It is recognised, (para. 9.173 *et seq.*) that wildness is part of the landscape character of the simple upland plateaux and hills unit, but the assessment of the impacts of the development is

downplayed, say at para. 9.179. Elsewhere, the assessment addresses the effects of the proposed development on the extensive search area for wild land, depicted for the Cairngorms (and extending southwards into far distant Atholl) in the search areas map attached to the SNH paper, and it does so in ways not envisaged in the policy statement. In particular: it treats the search area almost as if it were a kind of delimited area of wild land, almost heading towards treating it as a kind of designation, complete with a new acronym. A main role of search areas is to act as a starting point for debate about the extent of land within and beyond the area so delimited, where wildness can be experienced, and at what quality of experience.

15. The origins of the SNH policy statement *Wildness in Scotland's Countryside* (CNP11) (and for which I was the main author) go back into the former Countryside for Scotland, which recognised the concept as a distinctive element of Scotland's remoter terrain, as far back as its Park Policy statement of 1974<sup>2</sup>, and it became part of subsequent policy statements, such as that on Popular Mountain Areas<sup>3</sup> and carried into SNH as an inherited policy stance. Continued debate on the matter was, in practice, overtaken by early priorities in the new SNH. But the need to take the matter forward became more evident with the growth of ambitions for development in the remoter areas of Scotland (including the coast) especially for renewables and fish farming. The statement about wild land in the now overtaken NPPG 14 also implied the need for some practical guidance from the agency with wild land issues within its remit – namely, SNH.

16. There are obvious sensitivities attached to a policy of this kind, one reason for it not being an early priority for SNH, as a new agency forging (indeed, required to forge by Government at the time) a more sensitive approach to handling relationships with communities and representative bodies over environmental issues. This kind of sensitivity was particularly attached to the map, because any spatial representation of wild land would be bound to be interpreted by some interests as being antipathetic to development interests, or even as a starting point to some future round of unwanted statutory designation – the latter was never a consideration in the policy development, and I must assume that this will continue to be the case.

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<sup>2</sup> *A Park System for Scotland: Countryside Commission for Scotland, 1974*

<sup>3</sup> *The Mountain Areas of Scotland – Their Conservation and Management: Countryside Commission for Scotland, 1990*

17. However, if SNH could describe in words what wildness and wild land were, as constructs, it ought to be able to provide some spatial guidance, and it was evident that, without some indication on a map, there would be uncertainty, leaving too much space for a range of widely differing spatial interpretations of where wildness could be found. The search areas map does not in practice resolve such uncertainty, indeed by its focus on the more obvious core areas where wild land might be found, it could be said to have avoided the more difficult issues of attempting to delimit land of value for its wild character that lies outwith these core areas. This arose because the map was drawn in the light of the general constraint of sensitivity, and with certain broad factors in mind:

- first, the aim was to provide only a generalised depiction of the core areas where wild land might be more readily identified – so the approach was cautious;
- the depiction drew back from including land that might be thought sensitive for local community interests, recognising that NPPG 14 (now NPF 2) lays the task of safeguarding land of wild character on the local authorities, who ought to have a role in identifying locally the extent of wild land within their own context; and
- there are some exclusions from the depiction where the degree of existing impairment was thought to be significant (which some might contest) and some candidate areas that are of more limited areal extent were not included (either on mainland Scotland, or small off-shore islands), again to avoid undue precision at this stage.

18. ScotWays argues that wildness can be found beyond the core area centred on the Cairngorms. That extension is particularly to be found over the area of the Ladder Hills and into the upper catchment of the Blackwater and its adjacent hills – an issue that I will revisit in the precognition.

## **Other Issues**

19. ***Safeguards for Rights of Way*** Three main rights of way run through or close to the development site (GM17-19 as shown on Fig 21.2) and, as set out in our letter of objection, they will be seriously affected. Statutory access rights do not overtake rights of way (and other non-statutory rights) via s.5 of the Land Reform Act; hence, rights of way are, in some limited regards, superior to statutory access rights, in not

being restrained by restraints under the 2003 Act, say the landowner's ability to create temporary closures.

20. Setting aside for the moment the effects on the user, which I will refer to in my precognition, ScotWays takes the view that no turbine should be within one overall height distance from a right of way. Scotland, England and Wales have closely parallel technical planning guidance on developments for wind power in setting a one full height separation for transport routes, but only the Welsh TAN<sup>4</sup> has explicit provision adding public rights of way to this advice. As noted in our objection, the appellant's layout for turbines allows for some of them to be almost on top of some ways, and others apparently to be closer than one full height.

21. **Access Management Plan** The developer has prepared, along with the local outdoor access forum, a paper that sets out the approach (inter alia) of how public access will be handled during construction, and after ScotWays has welcomed this document as setting a good standard of practice: the principles set out here are the right ones, especially for continued access during construction and, should consent be forthcoming, this document should be part of the statement of working methods that is normally part of the conditions for any consent. Alternatively this material should form an explicit condition on its own.

22. **The Development as a Visitor Attraction** It is suggested (as is sometimes the case for other wind developments) that the Dorenell development could be a visitor attraction, perhaps as a visitor centre, or that the development be part of a green image for the area. In our view this is not a very practicable idea, not least because the site is difficult to access, unless there is some intention that the public are to be able to drive on the private road network for the development: otherwise it is very difficult to interpret a site for which the visitor can have no direct experience. Also, there is no evidence that the public have a sufficient interest in wind farms for them to become visitor attractions. Two attempts to run wind farm visitor centres, in North

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<sup>4</sup> *While there is no specific Scottish guidance in the relevant PAN to NPF2, the equivalent Welsh Assembly TAN does extend the separation advice for roads etc to rights of way used in the Scottish and English advice, and ScotWays uses this recommendation solely in terms of site design for rights of way and other routes used by the public – not necessarily, of course as an endorsement of the development. Welsh Assembly TAN 8., Annex C, p39, para 2.25 advises setting back to blade-tip height '...from any public highway (road or other right of way)...'. The next para advises that attention should be given to the BHS advice on greater separation for riders.*

Norfolk and Cornwall, have failed<sup>5</sup> even with the benefit of considerable amounts of public investment. Generally wind farms are not attractive sites for open-air recreation. They can attract early 'curiosity' visits, and some access roads or the internal roading for larger wind developments can be attractive to mountain bikers. One example of this is the large Whitelee scheme southwest of Glasgow, which has a very extensive road network, attractive for off-road cyclists because there is entry to it from both west and east, allowing for circuits to be made using local public roads. It is on relatively flat terrain so gradients are not challenging, thereby also offering safe roads for family cycling. So the main attraction here is the new access network, itself accessible to a large adjacent population.

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ScotWays

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<sup>5</sup> *The Delabole wind farm Visitor Centre closed in 2004, having only achieved around 10% of its anticipated visitor numbers (the building has been converted to offices). The Swaffam Ecotech Centre (centred on a turbine which can be climbed to a viewing platform) also closed after financial difficulties, but after a second injection of public monies it changed its role and market to be more of a community and conference centre alongside its educational role. Another major eco-centre, the Earth Centre near Doncaster, very heavily funded by the Millennium Lottery Fund, also failed on account of poor visitor numbers. Sadly, there seems to be limited prospect for eco-tourism centres of this kind that do not have heavy public subsidy.*

## **Annex 1 A brief note on national visitor surveys**

A1. Beginning with a generality, the level of investment in survey of tourism is far too small, given the size of the UK tourism economy, and a good proportion of present research effort is linked to marketing, such that data on visitors' activities are thinner than desirable. The main survey of domestic tourism – the United Kingdom Tourism Survey – was in the past criticised as being 'not fit for purpose' in a review<sup>6</sup> undertaken by UK Statistics and this led to welcome improvements in method and a doubling in sample size – notionally this sample is now 100,000 per annum, a seemingly huge sample but this includes non-responses the first entry question on the omnibus survey used for the UKTS, so the number of holiday trips picked up is less than half of this figure – still a large sample, but the data are spread across the whole of the UK. Overseas visitors are picked up through the International Passenger Survey on exit from the UK, and the validity of data for Scotland has long been criticised on sampling grounds. The main domestic day-trip visitor survey – the Scottish Recreation Survey is run by SNH, and this (by virtue of the interests of its main sponsor) is strong on outdoor recreation, and with an acceptable sample size, but it is limited to Scottish residents.

A2. In summary, data on use of the countryside by visitors are weak in coverage, there being a number of surveys for different segments of the market that do not connect one with the other; sample sizes are such that only limited weight can be placed on data disaggregated at the very local level; survey managers change format too often, thereby limiting the accumulation of trend data; and the coverage of activities in the countryside is weak. The only integrated, on-the-ground survey across different categories of visitor, which is generally relevant to this area is the HIE/HOST 2002-3 survey of tourism in the Highlands and Islands. It also needs some health warnings, of being just out of area (but only just) and it is now somewhat dated; the 2010 Cairngorm National Park Visitor Survey is also integrated and useful. However, none of the above mentioned (the SNH survey apart) are outdoor recreation surveys, being visitor surveys with a little recreation content.

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<sup>6</sup> Review of Tourism Statistics, Report 33 by the Office for National Statistics, 2004

