

Proposed Beaully to Denny 400kv Steel Tower Double Circuit Overhead Transmission Line

Public Inquiry – Stirling Session

Precognition of James Fraser DipTP, MA, MTS

Tourism and Economic Impact

On Behalf of Objector – Stirling Before Pylons

*Old Strevline, thou stand'st beauteous on the height
Amid thy peaceful vales of every dye
Amid bewildered waves of silvery light
That maze the mind and toil the raptured eye
Thy distant mountains spiring to the sky
Seem blended with the mansions of the blest.*

The Ettrick Shepherd

1. INTRODUCTION

- 1.1 My name is James Fraser and I am a Senior Associate with the Market Specialists, a company that undertakes a wide range of tourism consultancy work, primarily in the UK. I am a qualified planner, but for most of my career I have specialised in tourism and worked in senior posts in the tourism sector. I was awarded an honorary MA degree last year by Stirling University in recognition of my contribution to Scottish tourism. I am a member of the Tourism Society and the European Union of Tourist Officers, as well as a past Chairman of the Scottish Association of Tourist Officers and the Scottish Area Tourist Boards Chief Executives Group. I am also a regular contributor to national and international conferences and some of the themes I have recently given presentations on include 'Sustainable Tourism in Scotland's National Parks' (Scottish Council for National Parks Conference) and 'Making the Most of Heritage Destinations' (European Tourism Conference) and 'Realising the Tourist Potential of Braveheart' (West Sweden Film Tourism Conference).
- 1.2 I have 30 years experience of working at a strategic level in the tourist industry with tourist agencies and local authorities, including 23 years in the Stirling area in senior roles as Director of Tourism with Loch Lomond, Stirling & Trossachs Tourist Board (1983 – 1996); Chief Executive of Argyll, the Isles, Loch Lomond, Stirling & Trossachs Tourist Board (1996 – 2005); and Area Director of Visit Scotland for Argyll, Stirling and Forth Valley (2005 – 2006). I therefore have a very detailed knowledge of tourism and the economy in the Stirling area and believe I am well positioned to comment authoritatively on the likely impact of the proposed transmission line on the well being of the local tourist industry, the quality of the visitor experience and other aspects of the local economy which rely on the outstanding and unique heritage and environmental setting of the Stirling area to achieve success.

- 1.3 I am very familiar with the transmission line proposals as during my time with the Area Tourist Board and Visit Scotland I was involved in various stages of Scottish & Southern Energy consultations. In addition to contributing to the Tourist Board, Area Tourism Partnership and Visit Scotland formal submissions I dealt with a number of representations from local tourism businesses within close proximity of the proposed transmissions line between Braco and Denny, who are very concerned about the impact on their businesses if the preferred route is approved and goes ahead. Earlier this year I also attended the Strategic Session of the Public Inquiry in Perth when tourism impacts and issues were being considered.
- 1.4 While I was party to the submission made by Riddel Graham, Visit Scotland's Director of Strategy, Partnership & Communications, (letter dated 12 December 2005) I left Visit Scotland before the more detailed submission prepared by Professor Stephen Page, was compiled and lodged. I wish to make it clear I am no longer an employee of Visit Scotland and therefore cannot speak on their behalf. I am attending the Inquiry and submitting this precognition as a tourism expert witness on behalf of Stirling Before Pylons.

2. SCOPE OF EVIDENCE

- 2.1 I intend to briefly refer to national tourism trends and outline in more detail the importance of tourism to the economy of the Stirling area and the Hillfoots. I will also touch on the future prospects for growth within the context of the framework of tourism and economic development strategies and action plans.
- 2.2 I will highlight the significance of tourism and the economic activity within close proximity of the proposed transmission line including Sheriffmuir, Dumyat, Stirling University, the National Wallace Monument, Stirling Castle, Stirling Waterfront, Forthside and a cluster of private sector businesses, several of whom have lodged formal objections to the proposals. I also intend to demonstrate

the importance of their landscape setting to their continuing success.

- 2.3 I will refer to the strands of evidence presented by others in the landscape, recreation, history and culture precognitions on behalf of Stirling Before Pylons to show how they collectively play a crucial role in the promotion and attraction of tourists and day visitors to the Stirling and Ochils area and the overall quality of the visitor experience. Drawing on national and local visitor surveys I will argue that insufficient weight and consideration has been given by Scottish & Southern Energy to the impact of their proposals on the touristic appeal of the area and the quality of the visitor experience which is characterised by iconic heritage attractions in a stunning and unique environmental setting.
- 2.4 I will also refer to Stirling Council's ambitious plans to develop Stirling Waterfront as a new quarter of the City Centre and the new Sports Village and High School currently under construction linked to the major new 'gateway' access road off the A91 near the proposed route of the transmission line. I will argue that the Scottish & Southern Energy proposals will adversely affect some of the views from the new gateway route and the new development sites, which will be used by large numbers of local residents and visitors. I will also argue insufficient consideration has been given to the growing importance of the A91 as a tourist and commuter route and the impact of Scottish & Southern Energy's proposals on the views from this heavily used road.
- 2.5 I will clearly illustrate the potential tourism related economic impacts of the transmission line proposals, drawing on local data used by local economic and tourism bodies to monitor visitor volumes and expenditure levels. I will relate this to some of the impact work undertaken by David Keddie on behalf of the applicant and argue that the scale of impact on the profitability and the ability of some businesses to reinvest in improvements will be significant.

- 2.6 I will comment on some of the other impacts of the proposed transmission line in terms of the quality of the visitor experience, the attraction of inward investment and the appeal of Stirling University Campus, which is a major contributor to the Stirling and wider Forth Valley economy.
- 2.7 I intend to comment on and challenge some of Scottish & Southern Energy's evidence on the impacts on tourism in the Stirling area as indicated in their Environmental Impact Statement, precognitions and supplementary documents. I will argue that if a comprehensive cost benefit analysis had been completed, taking account of factors such as cumulative loss of tourist expenditure over a period of time; the impacts on the quality of the tourist and recreational experience; and impacts on views currently enjoyed by local residents and students at Stirling University campus, then this would have clearly demonstrated there is a strong case for undergrounding significant stretches of the proposed transmission line and diverting it to the west of the city.
- 2.8 I intend to conclude by outlining the reasons why I believe that the economic and related quality impacts on the unique historical and environmental setting of the Stirling area could be significant, and suggest that Scottish and Southern Energy should seize the opportunity to be 'a good neighbour' and make a positive contribution to Stirling's outstanding skyline by removing the existing 132 kv power line and undergrounding the proposed new 400 kv transmission line along a route to the west of the city. I will argue this represents a sensible and realistic way forward as it completely removes adverse economic and visual impacts and should lead to an enhancement of Stirling's outstanding and unique historic and environmental setting.

3. IMPORTANCE OF TOURISM

National Context

- 3.1 The importance of tourism to the Scottish economy is well documented in annual surveys published by Visit Scotland and the most recent research confirms tourism has recovered well since 2001 with some growth in both the value and volume of tourism until 2006, when there was a flattening out and slight decrease. International volume and value continues to show considerable growth, but maintaining volume and value from domestic tourism is proving more challenging. Tourism generates £4.16 billion for the Scottish economy and employs 200,000 people, which represents 9% of the total workforce.
- 3.2 The table below shows that while there was a small decrease of 1.3% in the value of tourism to Scotland (£4.16 billion) in 2006, there was a more substantial decrease of 7.2% in total tourist trips from 17.26 million in 2005 to 16.01 million last year. This masks a 14.2% increase in international visits and a 19.1% increase in expenditure compared to 2005 against declines of 10.2% and 9.5% respectively in the UK domestic market.

Table 1: Scotland's Volume and Value – IPS/UKTS

Jan-Dec	Trips (m)			Spend (£m)		
	2005	2006	%Change	2005	2006	%Change
International	2.39	2.73	+14.2%	£1,208	£1,439	+19.1%
Domestic	14.87	13.28	-10.7%	£3,006	£2,720	-9.5%
Total	17.26	16.01	-7.2%	£4,214	£4,159	-1.3%

Source: International Passenger Survey 2005 and 2006, UKTS 2005 and 2006
Note: Spend in nominal prices

- 3.3 This represents a setback for the Scottish Government's ambition to grow Scottish tourism by 50% in value and 20% in volume by 2015. Visit Scotland considers the growth ambition is still achievable, but will require significant intervention by both the private and public sectors, sustained over a number of years. In the Scottish Government's policy document – 'The Next Decade – A Tourism Framework for Change' (Document StBP/1/8) it is stated

investment should be built around the five main levers identified for growth, namely investment, increased marketing, quality, improved selling and a 24/7 year round industry.

3.4 I will return to the growth target and tourism trends later when I discuss and challenge some of the statements in the Tourism and Recreation Chapter of the applicants Environmental Impact Statement and the precognition of David Keddie for the strategic session of the Public Inquiry. However, at this stage it is important to note the 50% growth target is an aspiration and evidence to date suggests it is going to be difficult to achieve, particularly when Scotland is still so heavily dependent on the UK domestic market. The combination of a continuing decline in the value of tourism in real terms and the potential decreases in turnover forecast by the applicants in the Environmental Statement and David Keddie's Strategic Session precognition could have a significant impact on the profitability of tourism businesses within the area and the viability of some businesses within close proximity of the proposed transmission line.

3.5 My own view is that we are unlikely to achieve the 50% tourism growth target by 2015 due to growing international competition and under-investment in product development and marketing, compared to emerging short haul markets in Europe and long haul markets such as the Pacific Rim, where the scale of investment in tourism is significantly outstripping Scotland. I anticipate Scotland will continue to enjoy some growth in overseas arrivals, but this will be insufficient to compensate for the outflow of UK domestic visitors. While overseas markets are growing the vast majority of trips to Scotland are still from the UK. Scottish visitors made 40% of trips, 43% are from England and Wales and only 17% by overseas visitors (2006).

Regional Context

- 3.6 Regional data has historically been collated from extrapolations of the International Passenger Survey and the UK Tourism Survey and the sample sizes relating to each region have generally been too small to make meaningful comparisons on a year-by-year basis. While data is published I do not think there is any merit in considering the trends due to the low sample size and large margin of error. More recently, Visit Scotland has recognised the weaknesses in breaking down data from National and UK wide surveys and steps have been taken, along with other National Boards to invest more in the sample sizes of annual national visitor surveys. The International Passenger Survey has also been extended to capture overseas arrivals at Prestwick and Aberdeen Airports and via Rosyth Ferry, which in part, along with the growth in budget airlines, explains the large growth in overseas arrivals. More accurate data on trends is available from the annual business surveys undertaken by the former Argyll, the Isles, Loch Lomond, Stirling & Trossachs Tourist Board. A profile of visitors to the region, along with volume and value data and current and future trends, is summarised in the Argyll, Loch Lomond & Forth Valley Tourism Partnership's publication 'A Framework for Growth' (Document St BP/6/1).
- 3.7 Holiday and conference tourism in the region is worth £451 million annually, of which, UK residents generate 88%. There are 2.4 million holiday and conference trips to the area and the total number of bed nights annually is 9.2 million. Day trip tourism is also important in the region and in particular to some of the more popular destinations such as Loch Lomond and Stirling.
- 3.8 Tourist numbers, bednights and the overall value of the industry in the region have enjoyed mixed fortunes since 2001, but like the national situation there has been some growth in overseas visitors, but not quite so marked. UK tourism in the peak summer months has declined with notable exceptions being coaching hotels and self-catering. There has also been some growth in short breaks in the shoulder months, which has boosted occupancy levels and the

profitability of a range of tourism related businesses. More than half (51%) of the UK visitors to the area originate in Scotland, while only 17% of all visitors are from overseas which is in line with the national position.

- 3.9 One in ten of the workforce in the region is employed in tourism and a higher proportion of people in popular tourist areas such as Stirling and Argyll are directly or indirectly dependent on tourism for employment.

Stirling Area

- 3.10 For a number of years national and local economic and tourism agencies have sponsored STEAM Reports, which provide a very useful trend analysis of tourist and day trip expenditure, numbers and traffic which is broken down by the City of Stirling (Dunblane /Bridge of Allan/City of Stirling corridor), Clackmannanshire, Falkirk and Rural Stirling. The most recent report covers 2005 and includes comparative information for 2004 (Document StBP/6/7). I draw heavily on the data for the Stirling area and Clackmannanshire in this section and also in later sections where the economic impact of the proposed transmission line is calculated using the percentage decreases in business predicted in the Environmental Impact Assessment and in David Keddie's evidence at the strategic session of the Public Inquiry.

- 3.11 The STEAM report confirms that tourism is the major economic activity in the Stirling area generating £245.62 million of income in 2005, which represents a 2% increase on the previous year. In contrast tourism in the Clackmannanshire area was worth £16.12 million in 2005 with more than half of this being generated in the Hillfoots area. A total of 4.26 million tourist days were spent in the Stirling area in 2005, which is made up of 1.1 million days in serviced accommodation, 762,000 in non-serviced accommodation, 255,000 staying with friends and relatives and 2.14 million day visitors. In Clackmannanshire there were 397,260 tourist days with

57% staying with friends and relatives, 32% staying in tourist accommodation and the balance (11%) made up of day visitors.

3.12 The breakdown of expenditure for the Stirling area and Clackmannanshire is detailed in Table 2 below. In the total column all the Stirling City area corridor and half of the Clackmannanshire total is included as this broadly reflects the area, which lies within the 10 km boundary either side of the line referred to in the Environment Impact Statement.

Table 2: Analysis by Sector of Expenditure 2005 (£'s millions)

	City of Stirling	Clackmannanshire	Total
Accommodation	43.59	2.15	44.66
Food & Drink	38.40	2.90	39.85
Recreation	12.64	0.87	13.07
Shopping	26.75	1.51	27.50
Transport	31.05	2.63	32.36
Indirect Expend	67.52	4.32	69.68
VAT	26.67	1.76	27.55
Total	246.62	16.2	254.67

Source: STEAM Report 2005

3.13 Other interesting statistics from the STEAM report include the breakdown of the number of visitors, staying tourists and day visitors and tourism related employment.

Table 3: Tourist Numbers and Employment

	City of Stirling	Clackmannanshire	Total *
Staying Visitors	756,000	106,000	809,000
Day Visitors	2.14m	41,000	2.18m
Total	2.89m	137,000	2.98m
Direct Employment	5,020	453	5,246
Indirect Employment	1,526	98	1,575
Total	6,546	551	6,771

***Includes City of Stirling corridor and half of Clackmannanshire**

- 3.14 A useful snapshot of the profile of visitors to the Stirling area, the reasons for visit and views on services and facilities is available in the 2006 Stirling Visitor Survey (Document StBP/6/12) which was sponsored by Stirling Council. This is one of a series of visitor surveys commissioned by the Council every three years since 1994 and the 2006 survey report includes some comparative information from previous surveys.
- 3.15 A total of 1,501 face-to-face interviews were conducted between August and October in 2006 and some more in-depth interviews were also undertaken to obtain feedback on perceptions of the City of Stirling and the nearby Loch Lomond and the Trossachs National Park.
- 3.16 Interestingly 39% of the visitors interviewed were UK residents while 33% were from Europe and a further 17% were from North America. Almost two out of 3 UK visitors (61%) were Scots, while 34% were English. Sightseeing/visiting attractions (39%) were the main reasons for visiting Stirling, while 14% were visiting friends and relatives and 13% mentioned touring/stopover as the main reason for visiting Stirling. This reinforces the importance of Stirling's strategic location at the heart of Scotland and the appeal of its outstanding heritage and unique environmental setting which is dominated by Stirling Castle, the National Wallace Monument, rocky crags and the backdrop of the Ochil Hills.
- 3.17 Almost three out of five (58%) of those interviewed were first time visitors, which is well above the national average and probably reflects the timing of the interviews over the August to October period. Not surprisingly most Scots (94%) were repeat visitors and 50% other UK visitors had been to Stirling before. Interestingly 25% of North Americans had visited Stirling before, which reflects the appeal of heritage attractions and continuing impact of the Braveheart film, which firmly placed Stirling in key overseas markets as a 'must see' destination.

- 3.18 Seven out of ten visitors had visited or were planning to visit Stirling Castle, with one out of two including the National Wallace Monument and one in four including the Bannockburn Heritage Centre or the Old Town Jail in their itinerary. This emphasises the importance of the Castle and the National Wallace Monument as major heritage attractions and I contend also suggests stringent measures should be taken to protect their environmental setting.
- 3.19 Visitors who participated in the in-depth interviews were asked questions on their perceptions of Stirling as a tourist destination and words used by them to describe Stirling included –, **historical, nice, small, scenic landscape, beautiful, clean, pretty, friendly and romantic**. These attributes are all major strengths of Stirling and in my view the proposed installation of a large scale powerline and pylons, cutting through the Ochil escarpment and marching across the flat carseland of the Forth Valley, which forms an important scenic backdrop to Stirling’s heritage attractions and the Stirling University Campus, would be regrettable and not in the best interests of protecting and conserving Stirling’s unique setting and fostering the well being of the local tourist industry.

4. IMPORTANCE OF SPECIFIC SITES AND FACILITIES

- 4.1 The overall scale of tourism in the Stirling area is not surprising given the importance and appeal of iconic heritage attractions such as Stirling Castle, the National Wallace Monument and Bannockburn Heritage Centre, the popularity of the Stirling University Campus for conferences, meetings and holiday vacations, the supporting range of tourist accommodation, catering and retail outlets in and around Dunblane, Bridge of Allan and the City of Stirling and the popularity of Dumyat and the Ochils for hillwalking. There are significant clusters of tourism related businesses in the area, including some four and five star standard tourist accommodation and catering outlets, which generate large annual turnovers and are major employers locally.

4.2 I am not convinced from reading the Environmental Impact Statement and supporting documentation that the applicants and their advisers fully understand the dynamics of tourism and the wider economy in the Stirling area, or the importance of specific sites and facilities and their environmental settings to the overall appeal of Stirling as a major tourist destination and an attractive inward investment location. If they do, then this does not come through very clearly in the Environmental Impact Statement and I contend, as a result, there is a tendency to understate the potential cumulative impacts of the proposed transmission line. Comments on some of the more significant sites and facilities, the importance of the landscape setting to their appeal and the potential impacts of the transmission powerline proposals are therefore detailed below.

Sheriffmuir

4.3 While no detailed count of annual visitor numbers to the site of the Battle of Sheriffmuir is undertaken, locals and the proprietors of the Sheriffmuir Inn confirm the area is popular with tourists and local residents. In a previous submission by the Stirling Before Pylons Group it was estimated at least 100,000 people a year drive along the Sheriffmuir Road with a number stopping to take short walks, to visit the site of the battle and patronise the nearby Sheriffmuir Inn. Historian Virginia Wills provides a detailed description of the battle and its importance in a separate pre-cognition, but from a tourism perspective, while the site is less well known and visited than other battlefields, it undoubtedly has potential to attract more visitors linked to some low key and sensitive on site interpretation and promotion. Unlike other battlefields where there are large-scale visitor facilities, much of the charm and appeal of Sheriffmuir lies in the atmospheric nature of the open and 'wild' moorland. The removal of the existing pylon line would be welcome, but in my view the erection of a lesser number of much larger pylons and the associated cables would detract from the atmosphere and visual amenity of the battlefield and surrounding area.

- 4.4 The battle which took place in 1715, has an interesting story and is of interest to visitors as it was fought between a Jacobite force under the Earl of Mar and the Hanoverian force under the Duke of Argyll. While the battle was inconclusive more Jacobites and clans fought here than at Culloden, which is currently the subject of a £7 million redevelopment programme as part of the Highland Year of Culture.

Dumyat and the Ochils

- 4.5 This is a very popular area with walkers and a scenically important area benefiting from an Area of Great Landscape Value designation. Dumyat Hill and the Cocksburn Reservoir area is recognised as the most heavily used part of the Ochils and is within close proximity of the Sheriffmuir Road. Dumyat Action Group undertook some useful visitor survey work in 2004 and estimated 36,000 visitors accessed the Dumyat/Cocksburn Reservoir area from the Sheriffmuir Road. Nicki Baker's precognition shows that taking account of trends in user numbers, and those who access the reservoir from Bridge of Allan side gives a conservative estimate of an additional 15,000 to the area who would be adversely affected by the new power line. Interestingly, 75% of the visitors are from the Central Belt and 25% visit the area at least once a month. This confirms Dumyat and the Ochils are an important local and regional recreation resource as well as forming an important backdrop to Stirling and its major historic tourist attractions. It is unfortunate the proposed powerline will affect much of the area with the installation of larger and more visible pylons which will be exacerbated by the removal of large swathes of trees on the slopes down through Yellowcraig Wood towards the busy A91 commuter and tourist route.

Stirling University Campus

- 4.6 The University's Campus is widely acknowledged to be one of the most beautiful in Europe and has been sensitively developed over the 40 years to respect the scale of the site and the Airthrey Castle Historic Garden and Designated Landscape (HGDL). The campus

setting is one of the University's main unique selling points in terms of student recruitment and the generation of holiday and conference businesses. The University's Strategic Plan Overview for 2006-10 also confirms the importance of the campus as 'one of the University's most outstanding assets and the important role it plays in providing a place to stay and work and social, cultural and recreational resources for the University and the local community'. The University campus caters for 9,000 students and has a vibrant conference and vacation letting business supported by the Stirling Management Centre, extensive catering and meeting rooms and 2,000 bedspaces, all within the University Campus. It has an annual turnover of £78 million, employs 1,822 staff and has an overseas income of £15 million. Students spend around £50 million annually in the Stirling area. The Innovation Science Park on the University Campus is also a major employer and has grown in importance in recent years. The University is therefore a major contributor to the Stirling and wider Forth Valley economy.

- 4.7 The University is an objector to the proposed route of the transmission line and grounds for objections include the adverse impact upon the environment and amenity of the University Campus and the consequent damage to the operation of the University and the viability of its business plan. The proposed larger pylons will be visible from a number of locations on the campus, including the open views from Airthrey Castle and the eastern gardens of the GDL.
- 4.8 I share the concerns expressed by the Director of Estates and Campus Services in a letter of objection dated 28 November 2006. The University is a major contributor to the economy, educational, cultural and sporting life of the Stirling area, an important generator of conference and holiday tourism business and also plays a major inward investment role, particularly in the growing field of bio-sciences. It is clearly evident from the University's submission and marketing materials that the quality of the campus environment and the scenic backdrop is a key asset and this will be damaged by

the proposed prominent pylons in close proximity to its eastern boundary. The Director of Estates and Campus Services also outlines some justifiable concerns on the potential damage to the operation of the University and the viability of the business plan which is at odds with the comments of David Keddie on behalf of the applicants, who suggests the impacts will be minor.

Witches Craig Caravan Park/Coffee Bothy and Blairlogie Farm Shop

4.9 These very successful high quality tourism businesses are within close proximity of the proposed transmission line and while some adjustments to the route have been agreed by the applicant to respond to some of the operators' initial concerns, the siting of the pylons and the associated wirescape will still impact adversely on the views from the businesses. The success of these award-winning businesses is heavily dependent on the quality of their landscape setting and views out of their sites to the Ochil Hills and the National Wallace Monument. They are understandably very concerned that the proposals to site seven pylons, which are approximately 46-50 metres high and almost twice the height of the existing pylons, between Yellowcraig Wood on the slopes of the Ochils and the Powis roundabouts will impact adversely on their businesses.

4.10 I support the view of the operators of these businesses, who employ more than 40 people, that the impact on their trading performance and the quality of views is likely to be significant and I do not agree with the assertions by David Keddie that the impact will be minor and can be addressed by additional investment in marketing and absorbed as part of the normal cyclical changes in tourism trends relating to macro issues. It should be of some concern to the Inquiry Reporters that these highly successful tourism operators have serious concerns about the detrimental impact the proposed route of the transmission line will have on their businesses. They are concerned it will be necessary to invest additional resources in marketing activities to try and compensate for loss of trade due to the impact of the proposals if they are

granted planning consent, but more importantly they have serious reservations about the long term legacy of large scale pylons and additional wirescape damaging the quality of the existing views from their businesses. These family-run businesses have worked hard over a considerable number of years to build up successful award winning operations and I believe their concerns and interests should be material considerations for the Inquiry Reporters.

The National Wallace Monument

- 4.11 This iconic landmark heritage attraction is now one of the most popular paid visitor attractions in Scotland, following the extensive interest in the story of Sir William Wallace, Scotland's National Hero, generated by the blockbuster film Braveheart. The Monument at the height of the Braveheart phenomenon attracted almost 180,000 visitors, but some 12 years after the release of the film numbers have settled down to around 120,000 visitors per year. This excludes the estimated 80,000 who annually walk up to the base of the Monument, or get no further than the Braveheart statue in the car park. Interestingly, the Monument generates an annual turnover of more than £1 million and the charitable trust Stirling District Tourism Ltd uses some of the surpluses to support other heritage attractions and initiatives in the Stirling area. In other submissions, rightly in my opinion, much is made of the iconic nature of the Monument and its stunning setting perched on top of the Abbey Craig with 360-degree panoramic views over Stirling, the Forth Valley and the Ochil Hills.
- 4.12 Visitor surveys and regular feedback from staff at the Monument confirms the historic appeal of the building and the awareness generated by Braveheart as key motivations for the majority of visits, but importantly the quality of the views from the top and the bottom of the Monument are consistently commented on by a high proportion of visitors and are an important factor in generating repeat visits. I was responsible for overseeing the management of the Monument for more than ten years and was in regular contact with staff and visitors and also monitored the results of regular

visitor surveys and can confirm the quality of the panoramic views featured highly in feedback from visitors.

- 4.13 The visual impact of the existing pylon line is limited from the base of the Monument, but the profile of the proposed larger pylons, which are likely to be sited within 1 km of the Monument, will be much greater from the top and detract from the views to and from the Monument and across the flat carseland of the Forth Valley beside the A91. The pylon line on the scarp slope from the top of the Monument will also be particularly visible.
- 4.14 Staff at the Monument have expressed concerns about the impact of the proposed larger scale transmission line on the quality of the views and the consequent knock on effects on the overall quality of the visitor experience. In the telephone survey conducted by David Keddie on behalf of the applicants, staff suggested the transmission line could have a major impact on visitor numbers and might affect up to 25%. However, if their worst fears on impact on trading aren't realised even at the lower 4.3% estimated impact suggested by David Keddie, this could result in the annual loss of over £40,000 in income at the Monument, which I would argue is significant. At the upper threshold of 15% referred to in the Environmental Impact Statement this would rise to over £150,000 and seriously impact on the profitability of the Monument and the ability to reinvest in improvements, as well as reducing the capability of Stirling District Tourism Ltd to cross-subsidise other heritage related activities in the Stirling area. Importantly, the proposed pylon line would adversely impact on the quality of the views currently enjoyed by all visitors to the Monument.

Stirling Castle and the Old Town

- 4.15 Stirling Castle is the second most visited historic property in Scotland, with over 400,000 visitors annually (paid admissions and evening corporate events). The Castle is home to Scotland's finest renaissance palace, the Great Hall, the Chapel Royal and the Argyll and Sutherland Highlanders Regimental Museum. The adjacent Old

Town, which sweeps down the hill towards the River Forth, has the largest concentration of listed buildings in Scotland outwith Edinburgh's Old Town and includes Scotland's finest renaissance townhouse (the Argyll's Lodging), together with historic Broad Street, where the Mercat Cross and Tolbooth and much of the medieval street plan still survives. Other important structures include the medieval walls alongside the Back Walk, the Guildhall, Mar's Wark, the Old Town Jail and the Church of the Holy Rude.

- 4.16 Major features of the Castle and Old Town are their strategic geographic position and outstanding landscape setting with views to the east across the River Forth to the National Wallace Monument and the Ochil Hills and to the west towards the Trossachs, Campsie Hills and Loch Lomond. There are also striking views of the Castle, the Monument and the Ochils from the west and the M9 and it is no surprise that famous writers and poets over the years have vividly described how Stirling combines the attractions of the carse, river and crag in a classic Scottish landscape. More detail on the importance of the history of the Castle and Old Town and literary descriptions of their strong landscape setting appears in the submissions prepared by Drs Elspeth King and Fiona Watson, who are experts in their respective fields.
- 4.17 Over a 20 year period, as part of Futureworld and the Stirling Initiative, an impressive £150 million has been invested by public agencies and the private sector in regenerating the Old Town in a sensitive way and now many of the buildings are used for tourism purposes including hotels, a youth hostel, restaurants and visitor attractions. Over £20 million has been spent in painstakingly restoring the Castle alone and more investment on the Palace block is planned as part of the ongoing efforts to ensure Stirling is one of Europe's leading heritage tourism destinations.
- 4.18 Some of the achievements in repositioning and regenerating Stirling are outlined in the 'Stirling-A City at Heart' publication (Document StBP/6/10), which formed part of the successful bid to secure city

status. More information on the heritage significance of Stirling and some of the plans to make the most of Stirling as a tourist destination are covered in 'Stirling-A Strategy for Fulfilling the Town's Potential' (Document StBP/6/13). This publication also has some useful background information on proposals to capitalise on the untapped potential of the River Forth waterfront, which I refer to in the next section.

- 4.19 The historic significance of Stirling Castle and the Old Town and their importance to the efforts to position Stirling as a leading heritage tourist destination is clearly illustrated above. It is also evident that the landscape setting and views in and out of what is the historic core of Stirling are outstanding and sustained efforts require to be made to protect this special environment. It is therefore understandable why Historic Scotland employees at the Castle and others have expressed strong concerns about the impact of the proposed transmission power line on what is described as 'a classic Scottish landscape'. The larger pylons will have more visibility from the Castle Esplanade and ramparts as well as other vantage points in and around the Old Town.
- 4.20 In the business survey, undertaken by David Keddie on behalf of the applicants, an Historic Scotland employee is quoted as saying visitor numbers at Stirling Castle could drop as much as 25%. While I tend to agree with David Keddie that the impact on numbers will not be as high as this, due to the strong visitor appeal of the Castle, I do share the Historic Scotland employee's concern that the taller and bulkier pylons will detract from visitor enjoyment of the views across the River Forth looking towards the National Wallace Monument, the Ochil Hills and the winding River Forth.
- 4.21 I am firmly of the view that qualitative and quantitative considerations should be taken account of in determining the impact of this planning application and due weight should be given to the special qualities of Stirling's unique blend of heritage sites of national and international importance and outstanding environment

which contribute so much to the appeal of the area as a major tourist destination.

Stirling Waterfront, Forthbank and the A91

- 4.22 Now that most of the restoration works in the Old Town have been completed Stirling Council and other partners are focusing considerable attention and financial resources on realising the potential of the land alongside the River Forth between the Railway Station in the city centre and the A91 arterial route, which skirts the eastern boundary of the city and is close to the preferred route for the proposed transmission power line. This is part of Stirling Council's wider economic strategy 'Making Stirling Work' (Document StBP/6/11) which outlines plans to grow the Stirling economy by capitalising more on what is described in the foreword as a striking area in terms of its history, beauty and easily accessible location at the heart of Central Scotland.
- 4.23 The proposed £5million 'city gateway' route shown on the attached plan (see Appendix 1) was completed several years ago and after several abortive attempts work is now well underway on the first phase of an ambitious mixed development comprising of housing, hotel and conference centre, cinema multiplex and extensive riverside walkways at Stirling Waterfront. An important part of the development is a new high level bridge walkway, which will reconnect the city centre with the River Forth. The new 'city quarter' will be complemented by a Sports Village which is currently under construction alongside a new High School in the loop of land bounded by the A91, the River Forth and the new 'city gateway' access road. Work is well advanced on the new High School and the initial phases of the Sports Village are nearing completion with the successful relocation of Stirling Cricket Ground and the provision of all weather sports fields beside Forthbank Stadium.
- 4.24 The concentration of new housing, leisure, tourism and educational facilities alongside the new 'city gateway' access route and the River Forth is designed to make the most of the waterside location and

the open views across to the National Wallace Monument and the Ochil Hills. The new developments will be a major magnet for local residents and visitors to Stirling and add to the already heavy traffic flows in and around Springkerse Retail Park and Industrial Estate as well as on the A91. While there is some tree screening alongside the A91 the tops of the proposed large pylons and associated wirescape will be visible from the new Sports Village and the pylons will be visible from some parts of the more distant Waterfront development. Also the pylons and wirescape will dominate the eastern flank of part of the A91 between the Hillfoots and the 'city gateway' access route and detract greatly from the views.

- 4.25 In other submissions, and the one from Nicki Baker in particular, more detailed comments are made on the visual impacts of the proposed transmission powerline beside the A91 and here I just want to stress the growing importance of the route in commuting and tourism terms. I would argue at certain times of the day throughout the year it is as busy or busier, than the A9 north of Perth alongside other stretches of the proposed powerline route and it is likely to get busier as the Stirling Waterfront development and Sports Village are completed and more houses are built in Clackmannanshire.
- 4.26 The growing importance of the A91 route, the open nature of many of the views and the impact on views into and out of Stirling and Clackmannanshire do not appear to have been taken fully account of and given sufficient weight in the Environmental Impact Statement. While a number of references are continually made to the existing pylon line to justify the routing, it should be remembered when the line was first erected more than 50 years ago there was no Stirling eastern bypass. It was also a significant distance away from the built up area of Stirling and tourism and commuting flows were very low.
- 4.27 All of the above adds weight to the case for rejecting the preferred route for the proposed transmission power line to the east of

Stirling and reconsidering the option of undergrounding to the west of the city. The current proposal will significantly detract from the quality of the views on the eastern flank of the city which is being increasingly used by visitors, locals and commuters and will become more important as the major recreational, tourist, residential and educational developments alongside the River Forth and the new 'city gateway' route from the A91 are completed.

Bannockburn

4.28 The historic importance of the battle of Bannockburn is well documented but academics regularly debate the extent of the battlesite. Here I just want to highlight the importance of Bannockburn as part of the rich mix of historical attractions in the Stirling area. The existing Bannockburn Heritage Centre attracts around 65,000 visitors a year and the National Trust for Scotland acknowledge that the existing facility is underperforming and inadequate given the importance of the battle in Scottish history and the high visitor throughputs enjoyed at other historic sites in Stirling.

4.29 Ambitious plans have been drawn up to make more of the Battle of Bannockburn which involves investing around £12million in demolishing the existing Heritage Centre and providing an extensive range of built and outdoor battlefield visitor facilities designed to interpret the battle and associated events more imaginatively. It is anticipated the new investment will take place well in advance of the 800th anniversary of the battle of Bannockburn in 2014. It is unlikely the current proposed routing of the transmission powerline will impact on these plans.

Tourist Routes

4.30 In the Environmental Impact Statement (para 27.4.8.6) it is acknowledged that the transmission line would be visible at many points on the tourist/visitor route network, as well as from the key tourist and visitor focal points. The line would be visible from various points on the M9, M80, M876 and A9 routes, which are all

used extensively by visitors travelling to and from the Stirling area, Central Scotland and the Highlands. The scale of impact varies, but is significant when account is taken of the importance of the quality of the scenery and the natural environment which consistently feature strongly in surveys as being key factors in influencing holiday decisions.

5. QUANTITATIVE AND QUALITATIVE IMPACTS

- 5.1 While the applicants have attempted to quantify the tourism economic impacts of the proposed transmission line in percentage terms, linked to a survey of businesses operating within 10 km of the line, disappointingly, no attempt is made to calculate this in monetary terms for the entire Beaully to Denny route, or for specific stretches of the route such as Braco to Denny, which are the subject of more detailed scrutiny at local sessions of the Public Inquiry. This, in my opinion, is a major shortcoming when detailed tourism volume and value data has been available for a number of years for some parts of the route from STEAM Reports (Document StBP/6/7), which are sponsored and used heavily by local tourism and economic bodies. An extrapolation of the data for the Braco to Denny area is relatively easy to obtain and could have been used with other data to assess the cost benefit analysis of alternative options, including undergrounding to the west of Stirling. I will return to this shortly and demonstrate clearly the tourism economic impacts of the current proposals and how it would represent good value for money, in tourism and amenity terms, to pursue the underground option in the Stirling area.
- 5.2 An effort was also made by the applicants to audit a range of tourist and recreational facilities along the route and to assess landscape and visual impacts of the transmission line but, disappointingly, no quantitative assessment of effects upon the wider tourism and recreation activities and resources has been undertaken. This is very unfortunate as it would have been extremely useful if some quantitative and qualitative visitor survey work was undertaken at

selected locations along the route. This would have helped to obtain a clearer understanding of potential visitor impacts as well as providing an insight to visitors' perceptions of the proposals and, in particular, the likelihood of repeat visits. In the context of the overall cost of the development proposals, original visitor survey work of this nature would have represented a very modest investment. In my opinion this is a regrettable omission as qualitative issues are becoming increasingly important in influencing holiday and day trip decisions and the propensity for repeat visits.

5.3 Some systematic analysis of potential impacts on a topic-by-topic basis has been undertaken, but no serious attempt is made to draw these strands together to give a comprehensive overview of the qualitative and quantitative impacts of the proposals on the tourist industry, other aspects of the economy or indeed the local population's enjoyment of Stirling's outstanding environmental setting. In this respect I share some of the misgivings expressed by Professor Stephen Page in the Visit Scotland submission on some of the shortcomings of the Environmental Impact Statement. I do not accept the assertions by the applicants and David Keddie that what has been acceptable at other public inquiries in terms of impact assessment work is adequate or comprehensive enough in this instance, given the special nature of Stirling's heritage and environmental setting and the importance of tourism in such a concentrated area .

5.4 Notwithstanding these comments, a genuine attempt has been made by David Keddie, on behalf of the applicants, to assess the potential scale of economic impacts on tourism businesses which operate within 10 km of the proposed transmission line but I disagree with some of the weightings he has given to the level of impact on percentage of turnover loss and the assumptions on the extent of long-term residual impacts. Before I comment further on the potential tourism economic impacts in the Stirling area, the business survey results and the assumptions made by David Keddie in more detail, it is important to understand the factors influencing

the choice of holiday destination and related quality issues which are key drivers of tourism in Scotland and the Stirling area.

Tourism Attitude Surveys

- 5.5 VisitScotland undertakes regular holiday intention surveys in priority target markets to obtain information on factors influencing the choice of Scotland as a holiday destination; to get feedback on the quality of the visitor experience and to find out the likelihood of visitors recommending Scotland as a holiday destination and their future intentions. The 2005 Tourism Attitudes Survey (Document StBP/6/17) provides more detailed information on the research findings.
- 5.6 The most important factors in determining the choice of Scotland as a holiday destination are scenery and natural environment, followed by the number of things to see and do and the attitude of local people. Interestingly, 92% name scenery as very important or important and 89% mention the natural environment as very important or important. The responses in different markets also consistently rate the quality of the scenery and the natural environment very highly. When asked if any factors have become more important in recent years when choosing a holiday destination, scenery and the natural environment again featured very highly. Scenery (70%) and the natural environment (65%) have clearly become the more important factors for visitors when choosing to holiday in Scotland.
- 5.7 While the impact of the transmission line proposals on the scenery and the environment is covered in some detail in the Environmental Impact Assessment, I am not convinced their overall importance and contribution to the tourist industry and the quality of the visitor experience are fully understood by the applicants and this is evident from the way the weighting of impacts are assessed. Factors such as landscape designations, as opposed to visitor appeal and popularity, are given more weighting and consequently, in my opinion, the full and true extent of the impact of the transmission

line proposals on tourism in a number of locations, including the Stirling area, are understated. Also other qualitative issues such as the impact on cultural tourism, which are an important element of the visitor experience, are also lacking in coverage in the Environmental Impact Statement as is the potential impact on inward investment prospects.

- 5.8 In the Stirling area scenery and the environment, along with the heritage appeal of the City, are important drivers of tourism. The combination of Scotland's first National Park, the rich history and heritage and the location of Stirling at the meeting point of the Highlands and Lowlands all contribute to the popularity of the area as a holiday and day trip destination.

Economic Impact on Tourism

- 5.9 In the applicant's Environmental Impact Statement and David Keddie's precognition for the Public Inquiry Strategy Session extensive coverage is given to the results of a survey of tourism-related businesses and the likely economic impacts of the proposed transmission line in the short, medium and longer term. To support some of their assumptions used in calculating impacts the following two surveys were drawn upon:

- 'Investigation into the Potential Impact of Wind Farms on Tourism in Scotland' Visit Scotland 2002 (Document APL 10/6/8)
- 'Scotland/Northern Ireland Interconnector Tourism Impact Assessment' Scottish & Southern Energy (Document APL 10/6/10).

- 5.10 There was an interesting exchange of views between Professor Page and David Keddie on the business survey techniques used and the reliance on the Wind Farm Study and the Interconnector Tourism Impact Assessment, and they were matters, which were largely dealt with at the strategy session. I am content to base my

comments relating to the potential economic impacts on tourism of the proposed transmission line in the Stirling area on the business survey findings but have some reservations on some of the contents and findings of the two studies referred to above.

5.11 I do, however, have major concerns about David Keddie's interpretation of the business survey results and in particular the classification used to describe the scale of significance of economic impacts on individual tourism businesses and attractions; his conclusion that the impact will be 'negligible' despite concerns being expressed by almost half the businesses interviewed; the assertion that the duration of residual effects in the Stirling area are likely to be short term; and the suggestion that any downturns in business turnover as a result of the transmission line will be 'subsumed' within the fluctuations of the wider tourism economy, as opposed to compounding business trading prospects. I am also concerned that no attempt appears to have been made to ask businesses for views on the economic impact during the construction phase, which could be severe particularly for the cluster of businesses in close proximity to the line at highly visible locations such as Blairlogie, the Abbey Craig and Stirling University Campus.

5.12 It is interesting to note the VisitScotland wind farm study included some research on visitor attitudes to the impact of transmission lines and 51% of those interviewed claimed that electricity pylon lines detracted from the overall quality of visitor experience making this the most negative type of facility/development in the eyes of most visitors. In contrast, 29% of the respondents felt that wind farms and turbines detracted from the experience – a similar proportion to those mentioning wires and poles. Not surprisingly, only 1% of the respondents considered electricity pylons and wires enhanced the experience. When asked about the impact wind farms would have on future intentions to visit 26% claimed they would be less likely to return and 15% stated they would 'steer clear' of the area. It is reasonable to conclude from this research that the proposed larger and more dominant pylons and additional

cable lines will detract from the Stirling visitor experience and impact adversely on visitor numbers. I also support the views expressed by David Keddie, in his strategy session precognition and the applicants, in the Tourism and Recreation Chapter of the Environmental Statement, that the 15% 'steer clear' figure from the Wind Farm Study could represent the initial impact of the large scale transmission line before the impact settles down at the 4.3% or lower level over the medium term but I fundamentally disagree that this could be described as being 'negligible'.

5.13 I accept that the research was undertaken five years ago and in the interim a considerable number of additional wind farms have now been constructed including the controversial and highly visible Braes of Doune development, which would, I am sure, attract a higher percentage of negative responses from visitors if the survey, was repeated now. Nonetheless, it is clear from the research findings that the visual intrusion associated with electricity pylon lines was not popular with a high proportion of the visitors interviewed. Also the conclusion drawn from the study by David Keddie and the applicants, that just because some of the respondents stated they 'get used to pylon lines as they have been around for a long time', the proposed larger scale intrusion in the Stirling landscape is acceptable, does not stand up to close scrutiny in my opinion.

5.14 In David Keddie's precognition for the strategy session he mentions, in evidence given at the Ayrshire Interconnector Public Inquiry, he estimated that the economic impact on tourism would be no greater than 10% and this was accepted by the Reporter. He also refers to the Ayrshire Interconnector 'after the event' research and the finding that only 2% of businesses cited the transmission line as having a negative impact on tourism performance. He then goes onto conclude the impact on tourism of the Beaully - Denny transmission line will be 'negligible' and proceeds to put a positive 'spin' on the findings of his business survey despite the fact that 46% of the businesses participating considered there would be a negative impact on their business turnover. I can think of no other

development in recent years generating such a high and widespread negative response from the tourism business community.

- 5.15 I also have some concerns about drawing too many conclusions from the Ayrshire Interconnector Study when assessing the potential impact of the proposed transmission line in the Stirling area. The scale of tourism and concentration of tourism businesses and iconic visitor attractions in close proximity to the line is much greater in the Stirling area. I also believe the outstanding landscape setting and the relationship between major heritage attractions such as the Monument and the Castle, the River Forth and the backdrop of the Ochil Hills are much more significant contributory factors to the success of tourism businesses in this area. There is also a danger that a number of businesses could have ceased trading or changed ownership during the lengthy gap between the Ayrshire pre and post surveys, which could have dampened down the percentage of businesses commenting unfavourably on the impact of the interconnector power line and it is difficult to ascertain this from the survey report.
- 5.16 There are some confusing and contradictory estimates of impact in the Environmental Impact Assessment with a mention of a potential initial drop of 10 – 15% in tourism turnover while David Keddie’s strategy session precognition refers to an impact in the region of 3.2% which, under cross examination, was subsequently raised to 4.3%. This demonstrates how difficult it is to make an accurate judgement on the likely economic impact of the transmission line on tourism in the Stirling area and reinforces the need for more robust pre and post tracking surveys, although I accept other factors also have an influence on trends in tourism business performance.
- 5.17 For the purposes of calculating the likely size of impact on the tourist industry in the Stirling area I have used a number of different percentage points on the 4% to 15% ‘scale of impact’ referred to by the applicants and David Keddie. I have applied them to the STEAM Report findings detailed in an earlier section,

which estimates the value of tourism in the Stirling area (including part of Clackmannanshire) was £255 million in 2005. I consider it is appropriate to use data from this report, which has been independently compiled on an annual basis by a reputable company on behalf of local economic and tourism bodies who are interested in monitoring the volume and value of tourism locally in the absence of more robust regional tourism statistics.

Table 4: Tourism Economic Impact of Transmission Line in the Stirling Area

Percentage Drop In Turnover	Value of Tourism* (2005)	Annual Tourism Turnover Loss
15%	£255 million	£38.25 million
10%	£255 million	£25.5 million
7%	£255 million	£17.85 million
5%	£255 million	£12.75 million
4%	£255 million	£10.2 million

***Source: STEAM Report 2006**

5.18 On the basis of the above table it is evident the annual loss in tourism turnover in the Stirling area in the initial year after the completion of the transmission line could range from £25.5 million to a staggering £38.5 million. If the annual loss remained at the lower end of this estimate for a 5–10 year period after the initial year, this would equate to £66.3 million to £117.3 million. If the annual loss for, say, 3 years was at the mid-point of the range (10%) and the lower point (4%) for a further 7 years the cumulative impact would be a reduction in income of £147.9 million. If there is a residual impact over the 50 year lifetime of the transmission line of, say, 4% after the initial year then the cumulative loss of income would be even greater at £585.3 million.

5.19 **Interestingly, even at the lower level of the forecast tourism revenue losses - 10% year 1 and 4% thereafter - this works out to £66.3 -£102 million over a 5-10 year period, which is broadly in line with David Keddie’s prediction of 10-15% in the first year and 4.3% thereafter. This would be equivalent to the cost of undergrounding a significant length of the**

transmission line. On tourism economic impact grounds alone, without taking account of other important factors such as loss of amenity for visitors, Stirling area residents and students at Stirling University Campus and the impact on the attractiveness of the area for inward investment, there is a compelling case for pursuing the undergrounding option to the west of Stirling and rejecting the current overhead transmission line proposal.

- 5.20 The business survey revealed that almost half (46%) of all the operators contacted were of the opinion that the proposed transmission line would have an adverse effect on visitor numbers and business turnover. In the Braco to Denny corridor, the impact was considered to be considerably higher. In the Braco, Strathallan and Sheriffmuir area 57% of the tourism operators stated there would be a negative effect on their business while in the Blairlogie, Stirling and Denny areas this dropped to 48%. These are large numbers and reinforce the scale of genuine concern within the local tourism business community about the potential impact of the larger transmission line and this should be fully taken account of by the Inquiry Reporters.
- 5.21 Given the scale of concern expressed by tourism operators in the area it is surprising David Keddie is so dismissive of the survey findings and repeatedly plays down the likely level of financial impacts and suggests that a number of operators are exaggerating the scale of impacts. While I accept the loss of visitor numbers at the National Wallace Monument and Stirling Castle is unlikely to be as high as the 25% suggested by respondents to the survey, there are reasonable grounds for accepting the views of other businesses on the likely level of impacts, particularly those in close proximity to the line who are heavily reliant on the quality of the landscape for business success. The failure to give due weight to the survey findings suggests the applicants and their representatives were just going through the motions to satisfy the requirements of the Environmental Impact Statement.

- 5.22 I am also concerned that only an impact of over 15% is considered to be major with 10-15% being considered as moderate and below 10% is classified as minor. I would strongly dispute this value judgement as the consequences for any business losing up to 15% of their annual turnover is significant and impacts adversely on their profitability and ability to reinvest in improvements to compete effectively and meet the demands of increasingly discerning customers. In my view any loss of turnover due to the impact of the transmission line is regrettable and more weight should be given to the level of concerns expressed by businesses responding to the survey and in written representations.
- 5.23 Mention is made by David Keddie, that any impact on business turnover will be short term, but there is little evidence presented to substantiate this other than the results of the Ayrshire Interconnector Assessment findings, which I have questioned the relevance of earlier. Given the pylons will be prominently sited in what is arguably is one of the best classic views in Scotland and in close proximity to a number of tourism businesses who cite the quality landscape setting as a key factor in their business success, I am of the opinion there will be a long term 'legacy' impact from this development, which could adversely affect the turnover levels of some businesses.
- 5.24 I also take issue with the suggestion by David Keddie that 'any detrimental tourist or economic impact experienced in the area is likely to be outweighed or subsumed within the effects and impacts on tourism of extraneous factors, and indeed the marketing and promotional efforts of VisitScotland and its partners'. I highlighted earlier that there was a slight decline in Scottish tourism in 2006 and expressed the view there is no guarantee this will not continue, despite the aspirations to grow Scottish tourism, due to growing international competition and other factors such as under investment in marketing and product development. Far from being 'outweighed' or 'subsumed' by this, the impact of the transmission

line could compound the situation in the Stirling area and contribute to more challenging trading conditions for a number of tourism businesses. There is also evidence that the level of investment in marketing Stirling as a tourist destination is in decline with Stirling Council almost halving its contribution to VisitScotland in the current financial year for marketing and visitor services activities. If this continues to be the case the rate of recovery for some businesses will take much longer.

6. CONCLUDING REMARKS

- 6.1 I have demonstrated that tourism is a vitally important industry in the Stirling area and is currently worth around £250 million annually as well as being a major source of employment. I have also highlighted the efforts to establish Stirling as a leading European heritage destination combining the sensitive development and promotion of iconic heritage attractions with an outstanding and unique environmental setting in the heart of Scotland.
- 6.2 The significance of tourism, recreational, educational and economic activity at a number of locations in close proximity to the proposed transmission line has been outlined in some detail, along with evidence on the importance of their high quality landscape settings to their continuing success.
- 6.3 I have referred to the findings of VisitScotland Tourism Attitudes Surveys which confirm the importance of scenery and the natural environment when choosing to holiday in Scotland and the more local visitor surveys which reinforce the importance of scenery and the environment to the appeal of the Stirling area as a visitor destination.
- 6.4 I have commented, primarily from a tourism perspective, on the likely adverse affects of the transmission line and the larger pylons on specific sites and tourist facilities and have concluded that the applicants underestimate the scale of visual and economic impacts

and also understate the importance of some sites and facilities and their environmental settings to the overall appeal of Stirling as a major tourist destination and attractive inward investment location.

- 6.5 I have argued that qualitative and quantitative considerations should be taken account of in determining the full extent of the impact of this planning application and due weight should be given to the special qualities of Stirling's unique blend of heritage assets of national and international importance and outstanding environment which contributes so much to the appeal of the area as a popular tourist and day trip destination.
- 6.6 I have drawn attention to the new 'city gateway' access off the A91, near the proposed route of the new transmission line, and the major developments underway at Stirling Waterfront and Forthside designed to make the most of the waterside location and the open views across to the National Wallace Monument and the Ochil Hills. I have pointed out this area will become a major magnet for local residents and visitors and add considerably to the already heavy traffic flows on the A91 and conclude the new pylons and wirescape will dominate the eastern flank of part of the A91 and greatly detract from the views.
- 6.7 I have set out some reasons why I think there are shortcomings in the assessment of the qualitative and quantitative impacts of the proposed transmission line and contend more could have been done at relatively modest cost by the applicants to calculate the monetary value of impacts on the tourist industry and to assess visitor perceptions of the proposals at a cross section of sites along the route.
- 6.8 I have raised a number of concerns on the interpretation of the business survey results undertaken on the applicant's behalf by David Keddie and in particular have challenged the classification used to describe the scale of significances of economic impacts on individual tourism businesses and attractions; his conclusion that

the impact will be 'negligible' despite concern being raised by almost half of the businesses interviewed; the assertion that the duration of the residual effects in the Stirling area are likely to be short term; and the suggestion that any downturn in business turnover will be subsumed with the fluctuations of the wider tourism economy.

- 6.9 I have used the 4% to 15% 'scale of impact' referred to by the applicants and David Keddie, along with the STEAM findings on the value of tourism to calculate the likely size of impact of the proposed transmission line. This reveals the annual loss in tourism turnover in the Stirling area could range from £10.2 million to a staggering £38.5 million. If the annual loss remained at the lower end of this estimate for a 5 – 10 year period this would equate to £66.3 million to £117.32 million, which I understand is what it might cost to underground a significant length of the transmission line.
- 6.10 On tourism grounds alone, without taking account of the many other important factors which should have formed part of a comprehensive cost benefit analysis, I have concluded there is a compelling case for rejecting the current overhead transmission line proposals and pursuing an undergrounding option to the west of Stirling.
- 6.11 I am strongly of the opinion that Scottish & Southern Energy should seize the opportunity to be a 'good neighbour' and make a practical contribution to improving Stirling's impressive skyline, by removing the existing power line and undergrounding the proposed new line along a route to the west of the City. I contend this represents a sensible and realistic way forward, as it removes adverse long term economic and environmental impacts and should lead to an enhancement of Stirling's outstanding historic and unique environmental setting. This is also entirely consistent with national and local sustainability agendas and priorities and would result in

the project leaving a positive long-term legacy for current and future generations to enjoy the special qualities of the Stirling area.