1.0 Introduction

1.1 The Gleneagles Hotel is pleased to submit the following evidence to the Economy, Energy and Tourism Committee in order to assist its deliberations into the inquiry into the Scottish Government’s renewables targets. In this submission, the Gleneagles Hotel (hereafter “the hotel”) has concentrated its evidence on the ‘Planning and Consents’ section of the Committee’s ‘Call for Evidence’.

1.2 Of the two questions asked, ‘is the planning system adequately resourced and fit for purpose?’ and ‘how can national priorities be reconciled with local interests?’, this submission places more emphasis on the latter question, given the hotel’s experience of the matter to date. With regards the planning system, the hotel has questioned planning authorities processing a number of planning applications for wind farms, about the compatibility and suitability of locating such developments within the Ochil Hills and the surrounding Strathearn valley landscape of Perthshire. Whilst this evidence reflects local experience, the hotel is aware that a similar pattern is growing spatially across other parts of Scotland where the challenge will be to reconcile local interests (existing economic activities) with national interests (the recognised need for alternative sources of energy). It should also be considered that some existing economic activities manifest as local businesses with national interest and international appeal. As will be explained, the hotel is also a supporter of renewable energy as a whole. It considers the sector as a key component of the wider sustainability agenda which aims to put the future before the present.

1.3 In questioning how national priorities can be reconciled with local interests, the hotel wishes to offer a view. Inevitably, on-shore wind farm development brings about landscape change, potentially for 25-years or more. The cumulative effects of additional wind farms will change an unaltered landscape into a ‘wind farm landscape’. Therefore, the capacity of a landscape to accommodate onshore wind farms (being just one of a number of renewable energy sources) has reached a limit of acceptability in parts of the country; in relation to being compatible with other established economic land uses, such as the internationally-renowned hotel resort that is Gleneagles. Whilst protection is provided to ‘national’ categories of landscape, local and non-designated landscapes and other special places are less-protected. The hotel considers in this context there needs to be a sharper focus on the wider sustainability benefits of wind farms and the implications of them changing land uses and their effects – i.e. a balance needs to be struck between environmental and economic development; between local and national interests.

1.4 The purpose of planning, underpinning the planning system, is sustainable development, which it is stated:

“The Scottish Government believes that a properly functioning planning system is essential to achieving its central purpose of increasing sustainable economic growth. The way in which the planning system is structured and operated
should be directed towards that purpose and to supporting the Scottish Government’s five strategic objectives and fifteen national outcomes”. (Scottish Planning Policy (SPP) para 4). At SPP Para 33, a list of the strategic objectives and national outcomes can be found1 these also form the backbone to the Scottish Government's Economic Strategy (2011) six strategic priorities – which include “supportive business environment” and “transition to a low carbon economy”. The evidence here is that these objectives and priorities all have sustainable economic growth at the heart, but if not balanced will result in competing interests at the national (Scottish Government) and local (business, resident, authority and community) level.

1.5 A balance must therefore be struck between the competing land uses to achieve sustainable economic growth – renewable energy and tourism business being the interests in this evidence. This must produce a “quality of outcome” (SPP para 8). In the hotel's experience the quality of outcome in relation to wind farm development proposals and their operational reality i.e. the planned proposal compared with the operational development is a point of concern it wishes to emphasise (see 1.7 below). In relation to the Scottish Government's five key strategic objectives, the ‘supportive business environment’ and ‘equity’ objectives are considered to be often overlooked in relation to broad Government policy support for wind farm development, rather than the Government policy being set against protecting existing or established businesses, which already contribute to sustainable economic growth. This will be further explained in Section 1.7 below.

1.6 At the local planning authority level, the hotel's evidence in relation to balancing these competing interests is of broad satisfaction. The numerous wind farm proposals are being fairly assessed by the planning authorities, on their own merits – as these become more complex in nature due to the cumulative effects of further emerging new wind farm proposals in close proximity to each other, and to existing established businesses.

1.7 The hotel has also participated in the planning system as a supporter and developer of renewable energy (i.e. across a range of technologies, not just wind farms). This includes its expression of support for the now-operational Greenknowes wind farm in the Ochil Hills. In this case, being one of the first proposals in 2006-07, and being a supporter of the sector in principle, the hotel did not object. This was because the applicant's digital illustrations of the proposed wind farm did not raise the hotel's concerns about visual impact. However, the reality of the matter now, when the development is operational, the proposals were not fully accurate; as the evidence shows a marked visual impact on the hotel, as learnt from the feedback of visitors to the hotel. The Committee is asked to consider how local authorities can be further guided by national advisory agencies such as Scottish Natural Heritage in regard to visual impact assessment techniques to make the predicted “reality” of wind farms more “real” to help remove doubts about the representative accuracy of such

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1 SPP para 33 – five objectives are: learning, skills and well-being; supportive business environment; infrastructure development and place; effective government; and equity.
The fifteen outcomes include “a place for doing business in Europe”; “employment opportunities”; “valuing the environment”
techniques. This is a primary concern of the hotel as it examines further cumulative proposals surrounding the estate.

1.8 The hotel has also installed its own biomass boiler on-site. The technology is fit for purpose and installation should be encouraged within other commercial businesses. In this way, each individual contribution to reducing carbon consumption can be relied upon to generate future energy, rather than rely upon one reasonably mature sector (onshore wind) which it has been outlined, does not provide unlimited long-term support to the sustainability balance or quality of outcome in terms of land use and impacts. Wind farms are only one of a number of energy sources. The value of Scotland’s landscapes and special places must be recognised for future generations.

1.9 The hotel therefore trusts a balanced view of the sector is provided in evidence to the Committee. As a business, the hotel recognises the need for renewable energy; but it is also aware of what customer expectations are when they come to visit the hotel and the wider countryside and what message of Scotland they take away with them.

2.0 **Context**

2.1 The Gleneagles Hotel, located in the Strathearn valley, Perthshire is one of the world’s most coveted 5-star visitor resorts sitting in 850 acres of countryside. The natural beauty of its setting is a primary asset which has served the hotel and its visitors and economy well. When the Gleneagles Hotel opened in 1924 it was described as ‘a Riviera in the Highlands’ and ‘the eighth wonder of the world’. Today the hotel remains dedicated to excellence, just as it was in its earliest days when "the avowed intention of the management is to create happiness". The hotel was built by the former Caledonian Railway Company, with its own railway station. The Gleneagles Hotel is now owned by Diageo plc.

2.2 By the 1930s, golf and hotels were the height of fashion. Then as now, the Gleneagles Hotel was the glorious playground for people dedicated to leisure and pleasure in the most luxurious surroundings. Today the hotel adds all-year-round activity to its attraction, with an emphasis on health and well-being, considered also to be a sustainable approach to business.

2.3 In 1986, Gleneagles was awarded the Automobile Association’s supreme accolade of Five Red Stars, which it has retained every year. Since 1982, it has won more than 40 awards from the travel, catering and associated industries. Many of the awards commend the ‘experience’ of the whole, rather than specific aspects of a visit and much is attributed to the hotel’s setting in the countryside.

2.4 In 1993, the £5.9 million PGA Centenary Course, created by Jack Nicklaus, opened to complement the renowned King’s and Queen’s courses and form one of the world’s finest golfing venues. In 2014, Gleneagles will host the Ryder Cup international golf tournament between USA and Europe. It is an annual venue for other major golf tournaments, including past host of the Scottish Open and the Johnnie Walker invitational. The hotel’s experience of staging many of these similar events in the past has been the knowledge that television
and other media broadcast can send out immediate images of the surrounding countryside – and many viewers expect to see an unspoilt landscape as this is what they associate with Scotland as one of its cultural qualities.

2.5 In addition to the golf courses and hotel with spa facilities itself, the resort comprises timeshare holiday homes (Glenmor seasonal ownership) and a breadth of recreational pursuits which are provided within the hotel estate: equestrian / trekking, shooting, off-road driving, countryside walks and with other estates within Strathearn, falconry and fishing. These pursuits are provided to guests, visitors to the timeshare and the local community. The spirit of these pursuits is very much working alongside these activities in harmony with the landscape and surrounds. So reconciliation can be achieved between national and local interests in terms of sustainable economic growth, when these uses are compatible and complimentary.

2.6 In October 2011, the hotel commissioned an economic impact appraisal report of the resort on the local, regional and Scottish economy (prepared by 4-consulting), using the economic impact model produced by the Scottish Government (Office of the Chief Economic Advisor). The following are key indicators illustrating the economic scale and significance of the hotel resort in terms of its contribution to sustainable economic growth, another of the Scottish Government’s key objectives.

- Gleneagles employees over 800 people directly, on a permanent basis, plus further workers on flexible contracts according to season.
- The Gleneagles business sustains (directly and through the supply chain) nearly 1,300 jobs in Auchterarder, over 1,400 jobs in Perth & Kinross and nearly 2,000 jobs in Scotland providing a total income to employees in Scotland of £37m.
- Gleneagles sources 59% of goods and services from Scottish suppliers, above the average for the Scottish hospitality sector.
- A significant proportion of food is sourced locally. 61% of food is sourced from the Auchterarder area, 69% from Perth & Kinross and 91% from Scotland (compared to the Scottish average where purchases represent 45% from Scotland).

2.7 The resort is a supporter of sustainable development in its broadest sense, i.e. looking after resources today for future generations. It operates its own sustainability policy to make it become more environmentally friendly. Gleneagles recognises its environmental responsibility and is committed to working towards a sustainable future, aiming to become an environmentally friendly hotel "...to become the industry leader in environmental management and to contribute to a sustainable society." In that policy, there is no specific requirement for wind energy to be developed, however the message underlying is that to maintain its quality of setting and preserve the resources that makes the place so special, and achieve the right balance, requires the hotel to make careful selection of environmentally responsible interventions. The hotel has installed its own on-site biomass plant as well as a combination of other measures.
In its policy, Gleneagles has created a vision for the future, which encapsulates the following:
- Taking responsibility for its impact on the environment;
- Raising awareness and motivating a change in behaviour;
- Promoting environmental best practices; and
- Improving financial results, without compromising guest satisfaction.

The hotel is actively working towards the implementation of proactive measures to help protect and sustain the local, national and global environment for future generations. The hotel has won the Gold Award from the Scottish Green Tourism Business Scheme for its attention to reducing waste in all aspects of its operation – including sending its green wastes to composting; and off-setting carbon consumption through small interventions up to larger investment in on-site renewable energy plant. In aiming to become carbon-neutral, the hotel operates its own biomass plant on site which provides over half of all its domestic hot water and heating requirements.

With respect to team culture at the hotel, partnership is seen as a vital part of the hotel operation. From management to staff and including guests, everyone is encouraged to get involved in green tourism initiatives. One highly acclaimed example is where any funds raised by team members throughout the year are donated in support of the charity “Perthshire Big Tree Country” to support ongoing efforts to conserve and protect the region’s heritage trees and woodlands for future generations. The hotel considers if all team members are involved, they quickly become a part of the overall implementation and customer focus on this project. The hotel feels strongly that recent cases of commercial wind farm development proposals in the area fail to engage positively in partnership with local businesses (some community groups are being positively engaged by ‘community benefit’ but it is the hotel's experience that less progress is being made by applicants with the business community at large.

The foregoing has outlined to the Committee the emphasis the hotel places upon a need to take the widest approach to sustainable economic growth. It has demonstrated that national and local priorities can be reconciled in other nationally important land use developments, through sensitive understanding of the environment and land uses around it. More can be done, to help reconcile national and local interests with regard to wind farm development specifically. The main areas for examination are cumulative impact of the increase in number of wind farm projects in close proximity to each other; review of their compatibility with established businesses, particularly those that rely on the beauty and setting of their surrounds; and how the wider business community can be better-involved in the planning process in these circumstances.

Tackling Land Use and Renewable Development Incompatibilities

The Gleneagles Hotel surroundings are considered today to be equally valued as they were in the past. Indeed, in the emerging most up-to-date local development planning document that will shape land use change in the next 5-7 years, the local authority, Perth and Kinross Council, has paid recognition to the important role that hotel resorts, including Gleneagles, play in contributing to
sustainable economic growth. The Council recognise the region's resorts as major assets because of their history, setting, economic stature and worldwide appeal in promoting Scotland. Policy ED5 of the Councils emerging proposed Local Development Plan (January 2012) states “The improvement or expansion of these facilities [hotel resorts] will be encouraged and the landscape setting which is integral to their tourism offer will be protected from developments with the potential to adversely impact upon it”. The same plan sets out a spatial strategy for the future development of the Strathearn area, stating “Settlements in Strathearn are located within a very high quality landscape framework enjoyed by both residents and visitors. The Plan will have to strike a balance between identifying sufficient land to accommodate development needs while protecting the area’s assets.”

3.2 The hotel fully supports a plan-led system of planning. It is emphasised to this Committee the case, that policies of the emerging Perth and Kinross Local Development Plan for example, is evidence of positive planning for the future to help accommodate competing interests, in relation to striking a balance between the very attraction of an area for new development (whether that be for renewables or any other use) and the need to sustain and protect the asset for which that area is associated. The hotel commends the planning document for its ability to help reconcile local and national priorities and plan for future development with certainty.

3.3 The hotel resort estate comprises the land use designation known as a Historic Garden and Designed Landscape (HGDL). HGDL's are places coveted nationally for their historic and environmental relevance. Historic Scotland, which is the Government body responsible for HGDL's advise that HGDL's form a unique record of social, cultural and economic change through time. HGDL's are sites of national importance. Their inventories, drawn up with Historic Scotland, provide information on them to try to ensure that change is managed in a way that takes into account the qualities and significance of these landscapes and their constituent elements. This means seeking to retain key landscape features and characteristics for the future, while also allowing the landscape to accommodate modern demands. Through the HGDL, it is the philosophy of the hotel to protect and manage change in the surrounding countryside, that might be harmful or erode the quality of the setting of Gleneagles encapsulated by the HGDL – not to resist development.

4.0 Conclusion

4.1 As this evidence has demonstrated, the core of the planning system and our future custody of the land, is sustainable development. It requires balances to be struck upon various levels and tough decisions by our local authorities, directed by national policies and priorities. Wind farms can be important components of the energy mix, if developed in the 'right places' and with respect for the quality of assets they impact. It should also be considered that some existing economic activities manifest as local businesses with a national interest and international appeal which also need support to grow and develop in meeting the Government's other key objectives.
4.2 Wind farm development will result in at least 25-years of changed landscapes. Cumulative, and rapid, growth of more wind farms in areas of Scotland threaten the very essence of why these places are so well-regarded and known, and why established businesses can continue to make a significant contribution to grow the Scottish economy sustainably; based on the fine balance that has existed for many years.

4.3 Wind farm development is not the only response to climate change. Alternative, individual business and community responses must also be encouraged e.g. other non-wind farm renewable energy development contributions. Indeed the business community at large needs to be encouraged to be more involved with and work alongside developers seeking renewable energy developments.

4.4 The main areas recommended for future review or examination by the Committee is:

- Cumulative impact of the increase in number of wind farm projects in close proximity to each other in sensitive landscapes of Scotland. Some further guidance to applicants and decision makers is recommended, especially in the technique of accurate representation of visual impacts of wind farms and their prediction, specifically the cumulative visual impacts.
- Review of wind farm’s compatibility with established businesses, particularly those that rely on the beauty and setting of their surrounds;
- How the wider business community can be better-involved in the planning process in these circumstances.

4.5 The new raft of development planning policies being prepared by strategic and local planning authorities under the new planning regulations (Planning etc (Scotland) Act 2006) are already showing encouraging signs of the implicit need to encourage renewable energy. To maintain the balance, there must equally remain a need for policies to protect the quality of surrounding landscapes and places. Cumulative impacts of wind farm development in particular remains an area that needs careful and further attention.

Colliers International UK Ltd
29 March 2012