

**AILA QUEENSLAND POSITION PAPER ON
SEQ SCENIC AMENITY & THE SCENIC AMENITY GUIDELINE 8**

1 BACKGROUND

As Landscape Architects we are vitally involved in shaping sustainable urban and rural landscapes at district and regional levels. Our professional expertise includes a range of planning, design and management processes using various techniques and approaches to protect and enhance landscape. As a profession, our ethics focus on stewardship of the landscape and we make a significant contribution to the identification and management of landscape values.

Some practitioners specialise in the field of landscape evaluation and visual assessment, drawing upon an extensive body of international research and surveys regarding scenic quality and community preferences. Expertise and experience includes assessing landscapes values across the regional scale, including scenic amenity values.

The community expects valued landscapes will be identified, conserved and managed through appropriate planning and development control, especially in a rapidly growing region such as South east Queensland (SEQ).. A regional scale framework for scenic amenity was therefore required in an area which had for several decades used a range of approaches and techniques (mainly based on expert assessment) with variable outcomes reflected in local planning schemes.

In SEQ, regional planning required a consistent and community-based approach to the key question:

What are the landscape values of South East Queensland which residents consider should be protected in the Regional Plan and in Planning Schemes?

In response to this need, and the perceived limitations of expert methods to predict community preferences, the Regional Landscape & Open Space Advisory Committee and Brisbane City Council in 1999 initiated a pilot study which has become the Scenic Amenity Methodology (“the SAM”). This was progressively developed and trialed over a 5 year period, culminating in endorsement by SEQROC (now the Council of Mayors) and implementation by several local governments, followed by release of Implementation Guideline No. 8 (*Identifying and Protecting Scenic Values*) (“Guideline 8”) in 2007 by the Office of Urban Management (now Department of Infrastructure and Planning). The SAM has subsequently been incorporated into the Draft 2009 – 2026 SEQ Regional Plan, the Draft SEQ Natural resource Management Plan, the SEQ SoE report and the draft Ecosystem Services mapping undertaken by SEQ Catchments.

The Australian Institute of Landscape Architects (AILA – Queensland Group) has been supportive of this initiative and the extent to which the process (and the media) engaged the wider SEQ community. As the lead profession engaged in landscape planning and impact assessment including scenic amenity, we appreciate that scenic amenity is now being given its long-overdue recognition as a significant issue in regional and local planning, however, concerns initiated at the first release of the SAM regarding the assumptions and direction of the SAM¹, remain unresolved. Several of our members, with experience in landscape evaluation, participated in the SEQ Scenic Amenity Study Advisory Committee in 2004/05, and have expressed these concerns since 2001, both directly with the Steering Committee and through the Regional Landscape & Open Space Advisory Committee. The continued development and application of the SAM without an appropriate peer review process (refer section 2.2) and despite the continued concerns raised by our profession, whose responsibility to the community include maintaining the highest level of professional conduct in landscape planning and management, has resulted in the preparation of this position paper. Notwithstanding our concerns regarding SAM, AILA supported the concept of a consistent approach based on wide community input, and also applauded the recognition that scenic amenity is important to regional sustainability.

The proposed consolidation of the SAM and Guideline 8 into the Regional Plan increases the urgency for AILA (Queensland) to express its concerns regarding the methodology and its application in both regional and local planning policy. This discussion paper summarises the various concerns expressed by AILA (Queensland) members, and recommends further work to establish a consistent and credible landscape evaluation method which incorporates community values, and which can be adopted by landscape architects, Local and State governments, by other disciplines and the development industry. Ideally a comprehensive approach would address a range of landscape values as well as scenic assessment, at regional and district scales, and would apply to planning, development control and landscape management.

2 AILA (Qld) POSITION STATEMENT

2.1 Support for a consistent method and community scenic preferences

AILA (Qld) applauds the recognition afforded by the SAM in the development and promotion of scenic amenity as a significant issue to be addressed in managing regional growth. We also support the principle of integrating community scenic preferences into a rigorous and consistent approach to landscape evaluation.

Development of the comprehensive data arising from the community preference studies has been a valuable process in that it has raised awareness of scenic amenity priorities among the community and represents an important and necessary first step forward in establishing a regional approach. The scenic preference data forms a valuable resource showing the relative attractiveness of photographed scenes, as perceived by a representative sample of SEQ residents. In addition, the scenic preference methodology provides a useful basis for further development, to prepare a comprehensive method for scenic amenity assessment.

However, SAM's present form, is only a first step or layer of assessment that in itself cannot provide an appropriate framework within which the conservation of scenic amenity values and development can be appropriately considered and managed by planners, policy makers and designers. There remains additional tasks that need to be completed to enable SAM to continue to be a meaningful tool in identifying landscapes that have scenic significance.

2.2 Limited Peer Review and inequitable access to SAM

The expert panel review of SAM, May 2005, was undertaken by a statistician, community member and independent researcher, the panel did not include a landscape architect or, in particular a practitioner in the field of landscape assessment. Nor did it involve anyone with expertise in the application of scenic amenity identification and protection in QLD. AILA (Qld) consider the expert panel review to have been undertaken without appropriately qualification professional input or expertise in the areas of the study and therefore inadequate to meet the criteria of a properly performed peer review.

In addition to limitations of the peer review process, attempts by AILA member to review SAM (albeit voluntary and informal review) have been restricted by limited access to SAM's base data files, GIS mapping and algorithms.

The development of the mapping tools to fulfill SAM roles has been funded by the Queensland Government and copyright rests with the Government through the Department of Infrastructure and Planning. However despite requests to OUM (now DIP) for GIS files and an explanation of the algorithms used to undertake the mapping, access to this information remains inaccessible to AILA practitioners.

A properly conducted peer review process should be undertaken with appropriately qualified peers. Access restrictions to SAM methodology must be lifted to enable all practitioners that may have cause to implement a scenic amenity study to have equitable access and not be the privileged domain of the initial developer

2.3 Limitations of SAM to identify and protect landscape values.

The definition of scenic amenity in Guideline 8 is “ a measure of the relative contribution of each place in the landscape to the collective appreciation of open space as viewed from places that are important to the public” (Department of Natural Resources, 2001)”. In simple terms SAM classifies

landscapes into ‘what landscape looks better than another landscape’ based on photographic images, and combines this with ‘which areas do we look at most’ to derive scenic amenity values. The methodology does not address ‘what makes a landscape distinct or different from another landscape’, which becomes an important issue when identifying regional distinctive landscape features. The sole emphasis of SAM on making judgments based on photographic images has produced a methodology that favours scenes of naturalness, without consideration of the complex interaction of other aspects of the landscape that contribute to its distinctive regional character. AILA considers that scenic amenity is only one of many elements of the landscape which should be considered in evaluating regional landscape values, and that scenic amenity should also consider landscape character. The community’s often interchangeable use of the word landscape (referring to character) and scenery emphasises the perception that scenic amenity refers also to landscape character not just the visual expression of natural scenery, albeit one that most people relate to most strongly. In addition other landscape attributes such as cultural landscape values, historic landscape values as well as recreational landscape values are also significant.

Guideline 8 should in the first instance illustrate the context of scenic amenity in the total spectrum of landscape values. This approach would give a greater appreciation of the landscape as a complex and interactive resource as is illustrated in national and international research and surveys regarding scenic amenity and landscape evaluation.

2.4 Protection of Scenic Amenity Values across a hierarchy of scales.

It is not only regionally significant ‘scenic’ landscapes around south-east Queensland that are highly valued and cause community concern regarding development threats. The attractive landscapes that people are familiar with in their district of living, working, and in their recreational journeys through south-east Queensland, are essential to ‘sense of place’. These district features, such as rural scenes, a small knoll of trees amongst housing; tree-lined creeks at road crossings or a patch of remnant bushland, contribute to district and local identity. Such landscapes of more modest ‘scenic amenity’ are highly valued, especially where there may be no highly scenic forested hills. People grow a knowledge and sense of attachment to their district through continuity of the presence of undeveloped, naturalistic landscapes and these become highly valued.

An objective in the establishment of the scenic amenity study was the maintenance of sufficient areas and key features of valued landscapes in the face of development, at regional and district scale, and it was hoped that this would be a major input into the Regional Plan, and subsequently into local Planning Schemes.

These ‘sense of place’ landscapes and features are part of community identity, appreciated by residents, and visitors from other districts. Understanding the cultural aspects of landscapes is a key step in identifying places and features of value to each community, and in developing the planning procedures to protect or manage those landscapes. This will facilitate the integration of development while supporting each community’s crucial links to its landscape setting.

The SAM and Guideline 8 have not as yet fully established a procedure to achieve this integration, in that they do not recognise cultural ties to the landscape, nor the role of ‘sense of place’ landscapes in community identity (especially in the peri-urban and rural districts), and in that sense do not adequately capture landscape values. They do not yet provide a procedure to assess what forms the valued landscape framework, from the district to the regional scale, of south-east Queensland’s towns, villages or travel routes; and do not serve the need expressed by the community for scenic amenity to be a vital part of planning schemes and the development assessment processes.

Guideline 8 must be further developed to more fully illustrate how scenic amenity values are integrated across a hierarchy of scales where the regional planning frameworks can be integrated with more detailed descriptions at the local planning level (district landscape values) and detailed strategies for their protection outlined.

2.5 Other Scenic Amenity Values

Although the SAM has identified landscape attributes widely regarded as attractive (“scenic preferences”), and those parts of the landscape which can be seen (“visual exposure”)², these are only part of the landscape values which require protection through regional and local planning. Other landscape values include:

- landscape viewsheds/settings that may consist of a number of regionally as well as significant and not so significant district landscapes.
- landscape features that are the focal points, the large-scale ‘icons’ and the small-scale combinations of elements, which contribute to sense of place.
- landscape character of a district that creates a sense of place. Features and/or landform types are characteristic of the region or district, that contribute to its ‘image’ rather than just the special regionally significant places that may account for 5% of a total landscape in any one district.
- cultural/historic landscapes are often very significant to district, regional and national communities, e.g. location of land fall at the town of 1770. Landscapes are important to cultural groups and represent our history or heritage in a range of district settings
- Development pressure on landscapes. There is a need to identify these sensitive landscapes that are most likely to experience development pressure and ensure that these landscapes regardless of regional significance are protected, e.g. problems with protecting landscapes along major arterials

These extra ‘layers’ of information should be added and a consistent basis for such assessments should be the subject of further development of Guideline 8.

2.6 Community Preferences

The community scenic preference studies (‘What’s in a View’) have provided an excellent and well-validated database, but by definition had to be broad scale. Most people find trees, water, mountains and rural scenery attractive, and industrial development unattractive. These preferences have been confirmed by the SEQ studies, which partly validate the widely-used “scenic quality” ratings derived largely from US studies. However this new SEQ information has only limited applicability without further analysis of the features which make one place more scenically attractive than another. ‘What’s in a View’ uses 4 Domains (Bush, Coast, Urban³ & Rural) and the Visual Elements (e.g. path, people, fence, garden, grass mown, native pine, water inland, water ocean, estuary etc) represent only broad land use and land type categories. They distinguish several types of grass cover but do not distinguish between moving and still water, rugged mountains and rounded hills, tall dense rainforest and open eucalypt woodland etc. (which are distinguished in, for example, the USFS scenic quality ratings).

An assessment of aesthetic values will inevitably include subjective elements, and these are not abolished simply by surveying a wide sample of opinions. Subjectivity arises also from design of the survey, and analysis of the results. For example, public surveys often show that residents do not find ‘iconic’ scenes especially attractive. However if the survey question was “which scenes would you show a visitor?”, a different set of priorities might emerge.

There is a need to expand ways to identify scenic preferences, that in no small part, take into account landscape integrity and a suite of local landscape values that may well be outside those that have been used to date to define scenic preference. The further development of Guideline 8 should take this into consideration

² AILA has agreed that the term “scenic amenity”, as defined by SAM, represents a combination of scenic preferences and visual exposure. However the draft SEQ Regional Plan (2008), the Natural Resources Management Plan (2008) and the State of the Region Technical Report (2008) now adopt wider definitions, implying that this parameter represents a wider range of landscape values.

³ Although the SAM was initially intended to address only open space (non-urban) landscape, it appears that this boundary became ‘blurred’ where urban elements are viewed from open space, and the scenic amenity maps now extend across the entire urban footprint. The scenic and other amenity values in non-urban open space is so fundamentally different from those in urban/suburban areas (where urban design criteria more appropriately apply) that the two should not be addressed in a single methodology.

Scenic Preference studies should be seen as a valuable adjunct rather than a corner stone to the system

2.7 Consideration of Urban Areas

SAM's assumptions results in all built form causing a decline in scenic amenity values irrespective of the nature of that form, i.e. heritage building or industrial warehouse are rated the same. This outcome should have raised some 'warning signals' that the methodology's emphasis on natural landscapes makes it inadequate to identify a variety of scenic amenity values across the region and would have limited application, especially in or adjoining urban areas. Without further 'unpacking' of these community preferences, the SAM outcomes cannot be readily used or adapted for land use planning or development assessment.

Assessments of urban landscapes/streetscapes are a very complex consideration and it is not appropriate to compare quality urban landscapes with rural and natural ones. It is considered that SAM should only be applied to non urban areas or outside urban footprint areas.

2.8 Context and Setting in Photo Data Sets

Although the data set is extensive and useful, it is nonetheless based on photographs which often lack context, and which vary considerably in depth of field. Some are short-distance (close-up) views of creeks etc which are not part of a wider scene, and some are long distance views showing open panoramic scenes. Some of the latter have foreground elements (trees etc) which add interest, while other photos have little or no foreground features. Slight differences in photo point position can change the attractiveness of the photograph, although the scene remains the same. Similar considerations apply with respect to the depth of field of views shown in photographs.

There are conceptual and technical difficulties in 'translating' photo-based preferences for certain proportions of visual elements (trees, mountains, water etc), as seen from viewpoints at ground level, into maps based on digital terrain models. This methodological step is largely a 'black box' with unknown opportunities for subjective interpretation. We are not sure if this step is just a simple land use map (ignoring the proportions preferred in photographs), or if it involves more complex algorithms requiring GIS expertise. This step has never been used or verified by any of our members with experience in scenic evaluation, so we cannot attest to its reliability or repeatability. Unless and until the method is capable of being applied by landscape evaluation experts, it will not be widely used.

Guideline 8 should give clearer guidance on how photosets should be established to ensure consistency across Scenic Amenity Studies. Techniques to use a fuller set of district, sub regional and regional views should be included in data set establishment and evaluation.

2.9 Icon and Regional distinctive Landscape values

As highlighted in section 2.3 SAM does not distinguish icon or regionally distinctive landscape features because the framework of the methodology is limited to assessing scenic images from photographs without regional or even national context. The result is regionally distinctive landscape features that are acknowledged as icon images of SEQ such as the Glasshouse Mountains are rated the same as any rocky outcrop on a mountain. This is incongruous with the objectives of SAM to identify and protect scenic amenity values in the SEQ region. Similarly the values attributable to Pumistone Passage (one of only 5 passage landscapes of its kind in Australia) and Morton Island rate very low (identified as locally important to low scenic amenity values) in the scenic amenity mapping. These results indicate the mapping is too simplistic in its application and that 'expertise in the field of landscape assessment is required to provide input into distinguishing what makes up the icon and important regional landscapes of SEQ in the context of both regional and national significance as has been undertaken in other States of Australia and overseas.

Guideline 8 should allow for an overlay of iconic landscapes that as a results of the limitations of the methodology do not rate as of regional significance.

2.10 SAM as a development assessment tool

AILA (Qld) has consistently opposed the extension of the SAM to provide a development assessment 'tool', rather than just as a 'flag' which alerts approval agencies regarding threats to high value

landscapes. A metric approach to development assessment is inconsistent with performance-based planning and development control.

The quantitative approach is especially unsound when used to calculate declines in scenic amenity resulting from development. It assumes that (as a simplified example), if the public rates a 'Rural' photo with no structures as 4.0, and a similar photo with a road as 2.0, the presence of that road has reduced scenic amenity by a value of 2.0. The development assessment 'tool' goes further and calculates that, if the road occupies 10% of the photo, then roads generally have a multiplier of -20; which is to be used in visual assessment of new roads.

These multipliers exaggerate the influence of the photo point, as well as reinforcing our criticism of an arithmetical approach. We do not consider it necessary or wise to use the same method for identifying high-value landscape features and for development assessment. This is too prescriptive at this early stage in the development of a new methodology. It would be sufficient to map such areas in such a way that their values are identified and 'flagged' as triggers for protection and management through policies and more detailed evaluation.

In addition the scenic amenity look-up table in Guideline 8, which sets the rating against which development assessment percentages are measured, has been segmented into 2 regions and assumes that where a landscape of low value, rated 4 and below (encompassing many urban areas), 'the scenic amenity is reduced where visual exposure is higher'. In practice, this means highly visible urban areas have the least scenic amenity value (irrespective of the nature or form of these urban areas) and imply further uncontrolled development can apply under the provision of a percentage of visible development. This is clearly incompatible with community expectations towards the protection of scenic amenity values.

Guideline 8 be reviewed as a guidance to management of regionally significant landscapes and its application as a development assessment tool reconsidered in regard to incompatibilities with the performance based approaches used in most local planning schemes.

2.11 Consideration of district and private scenic amenity values

The scenic amenity maps derived from the SAM are based on visual exposure to public places, not private residences, district roads, etc. It is unclear whether the same tool is intended to be used for assessment of visual impacts on district landscapes and residential views. While the visual exposure modeling is suitable for such purposes, techniques of broad scale landscape evaluation and mapping are generally not appropriate for assessing visual impacts of single projects on individual houses or sites.

When the outcomes of the Scenic Amenity Study and Guideline 8 are applied to planning schemes, significant district and private landscape values are not protected, e.g. Yandina Quarry

As stated above it should be made clear in Guideline 8 that SAM for the greater part identifies regionally significant landscapes and give guidance to the strategies for control and management of district and private landscape values in the face of potential change and development pressure

3 SUMMARY

The South East Queensland Guideline 8 "*Identifying and Protecting Scenic Amenity Values*" (Office of Urban Management 2007) is a major initiative in scenic amenity assessment and mapping at the regional scale. The Scenic Assessment Methodology (SAM) is a bold departure from previous approaches used in Australia and overseas, and attempts to identify and rate community preferences for scenic amenity in a non-subjective and non-expert manner, then use the same rating tool for development assessment.

Guideline 8, and its methodological tools have attempted for the first time to establish a consistent process for the assessment of landscape values throughout the SEQ region, but have done so in a prescriptive manner that differs from performance based planning and development control.

AILA (Qld) has provided comments and constructive criticism of the methodology over the past six years, through participation in the process by several practitioners experienced in landscape evaluation. The AILA Regional Landscape Working Group has now reviewed Implementation Guideline No.8 and consolidated its concerns regarding the method and the outcomes of its application. We remain concerned that the method, without further development, will lose credibility and reliability, and will deliver results which are inconsistent or ineffective in guiding regional and local plans.

AILA (Qld) considers that Guideline 8 is a useful preliminary document which has raised awareness and established scenic amenity as a significant issue for consideration in planning, but now needs to be more fully developed to become a meaningful tool in the management of scenic amenity values in South East Queensland.

AILA Qld Regional Landscapes Committee authors: John van Pelt, Tony Prineas, Rachel Piper, Leona de Ridder, Sian Crawford, Alan Chenoweth, Catherine Brouwer