Circular Head Council Draft Amendment PSA 2023/1 Scenic Protection Areas

Tasmanian Planning Commission Hearing
Circular Head Municipality
Stanley Coastal Landscape Assessment (SCLA)

11 April 2024





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QUALIFICATIONS

- Doctor of Philosophy, Deakin University, Geelong, Australia (Ecological Principles, Species Loss, Climate Change)
- Master of Landscape Architecture, University of Massachusetts, Amherst, USA (Landscape Planning/Perception Research)
- Bachelor of Arts in Geography (with minor in Economics), University of Montana, Missoula, USA

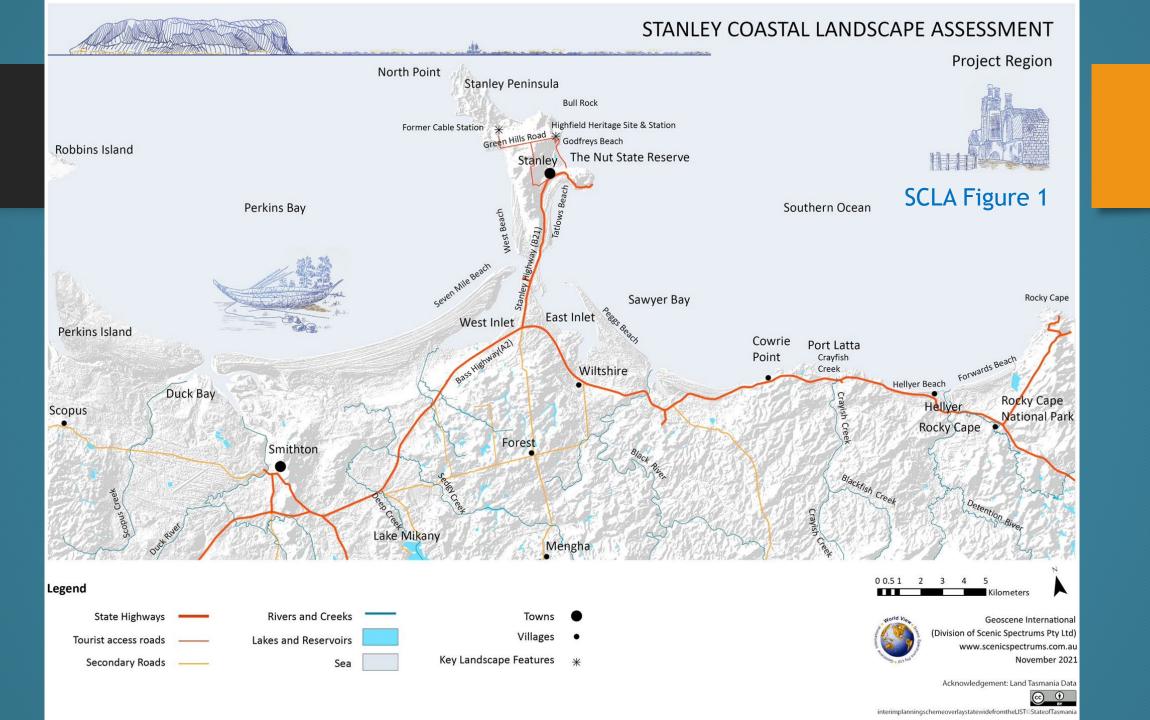
Order of Presentation

- 1. Overview of the Stanley Coastal Landscape Assessment;
- 2. Observations Regarding Draft Amendment PSA 2023/1; and
- 3. Response to Questions.



by Dr. Dennis N. Williamson Geoscene International (A Division of Scenic Spectrums Pty Ltd)





Stanley Coastal Landscape Assessment (SCLA) - A Deep Landscape Values Assessment

The Stanley Coastal Landscape Assessment (SCLA) report is presented in three parts:

- Part A Landscape Description and Assessment of the region's natural and cultural landscapes, including: geoconservation sites; landscape setting units, flora and fauna species, land use, tourism attractions and facilities, Aboriginal and European history, and cultural heritage;
- Part B Scenic and Visual Landscape Assessment of scenic quality classes, viewpoint sensitivity levels, viewing distance zones, and scenic value areas; and
- Part C: Overall Landscape Significance, including Aboriginal and European cultural heritage and scenic, tourism and natural conservation values, and key recommendations.



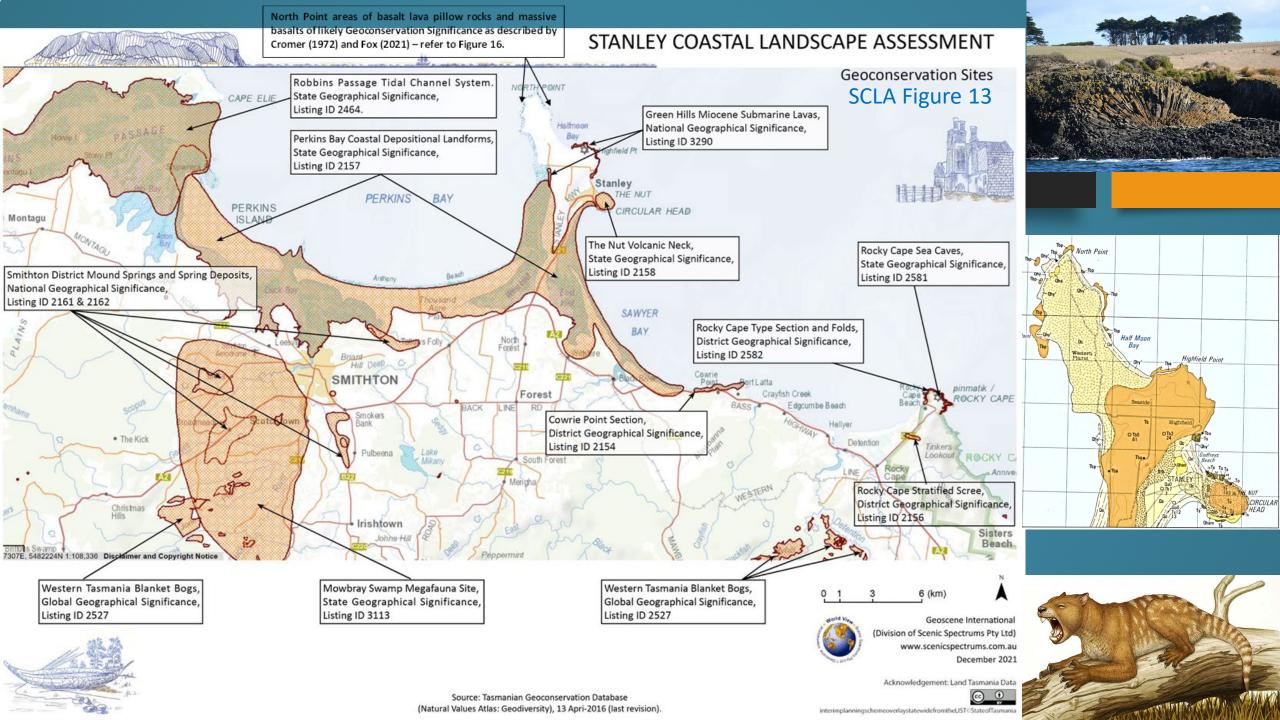






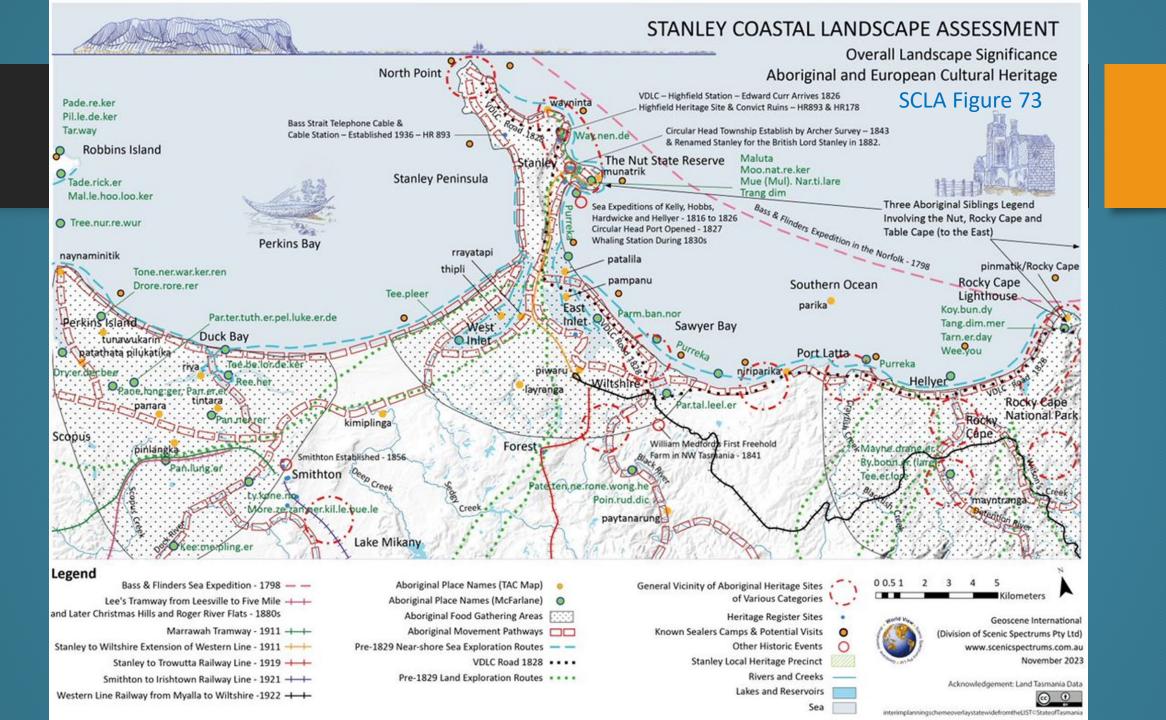
Key Findings & Recommendations: Geologic Sites of Significance

- Region comprised of volcanic basalt and coastal sedimentary landforms, creating a series of uplifted mountain ridges,
 hills and plateau that are flanked on the north and in the intervening valleys by coastal plains and basins.
- The area contains Geoconservation Sites of global to district significance. Areas at Rocky Cape are ~1.5 billion years old, volcanic formations at The Nut and fringing Stanley Peninsula that are collectively of "World Class" and currently under assessment by the Australian Heritage Council for possible inclusion on the National Heritage List, and the Mowbray Swamp Megafauna Site near Smithton.
- Volcanic sites at North Point on Stanley Peninsula should be officially investigated and assessed by the Tasmanian Geoconservation Database Reference Group to determine whether they should be added to the Tasmanian Geoconservation Database (TGD) and on the Tasmanian Natural Values Atlas via the annual Geoconservation Site Significance & Listing Process.
- Areas of the Stanley Peninsula have recently been nominated for the National Heritage List and should be for the Tasmanian Heritage List. Includes areas of:
 - The Nut and volcanic features of Plum Pudding Rock;
 - West Beach submarine lava and lava lobes; and
 - Highfield Point and North Point.



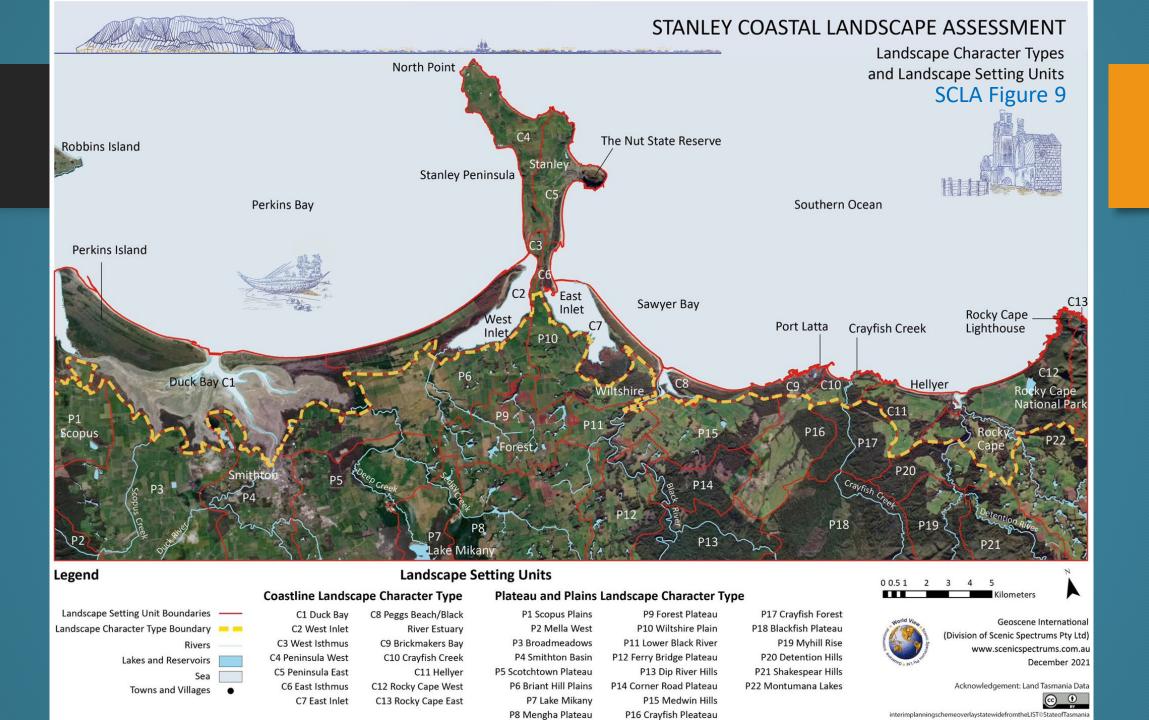
Key Findings & Recommendations: Aboriginal and European History & Cultural Heritage

- The Region exhibits a rich and significant combination of Aboriginal and European History and Cultural Heritage.
- The Stanley Peninsula Area (as delineated in Figure 73) should be designated in the Circular Head Local Provisions Schedule (LPS) under the Local Historical Heritage Code.
- Other areas that should be considered for inclusion as a Local Historic Landscape Precincts include:
 - the Smithton Basin Area;
 - the Duck Bay Area; and
 - the Rocky Cape Area, as delineated in Figure 73/Slide 14 (incl. the Shakespeare Hills Area).

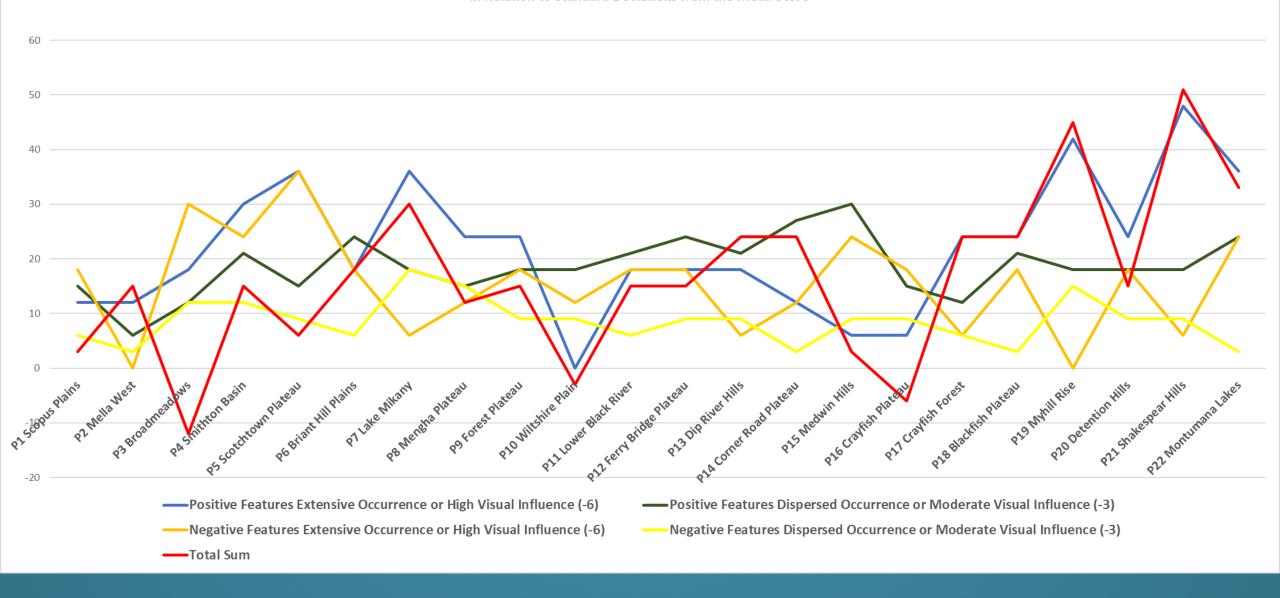


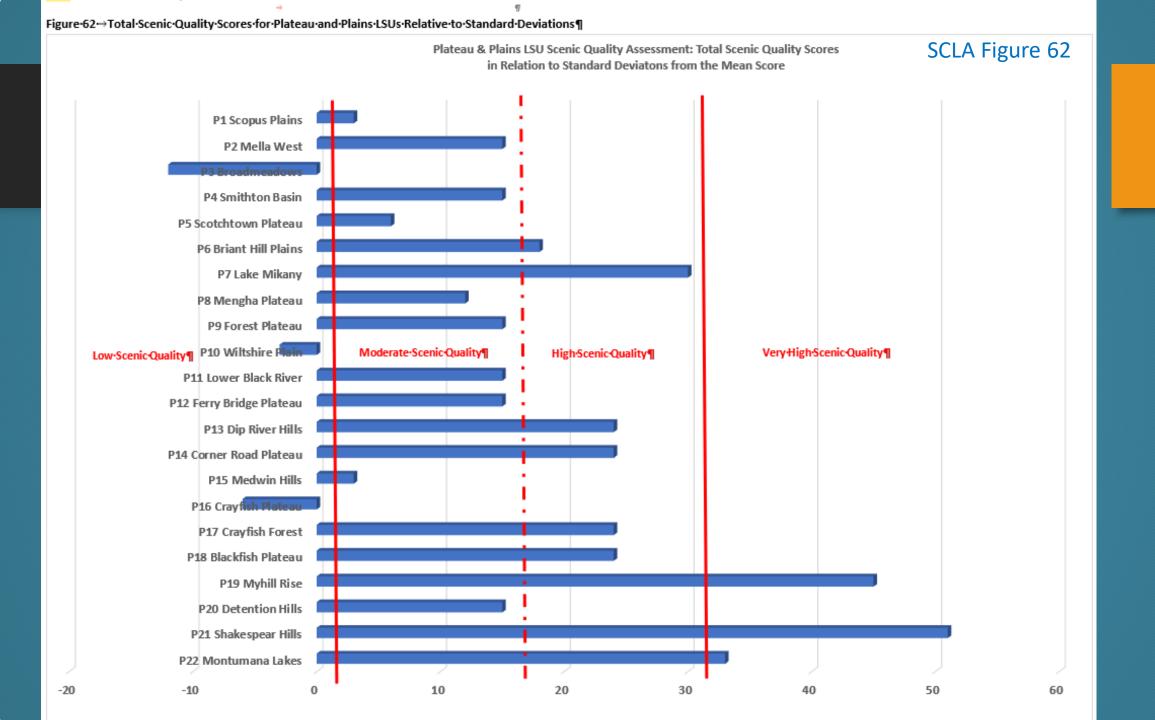
Key Findings & Recommendations: Assessment of Scenic Quality Classes

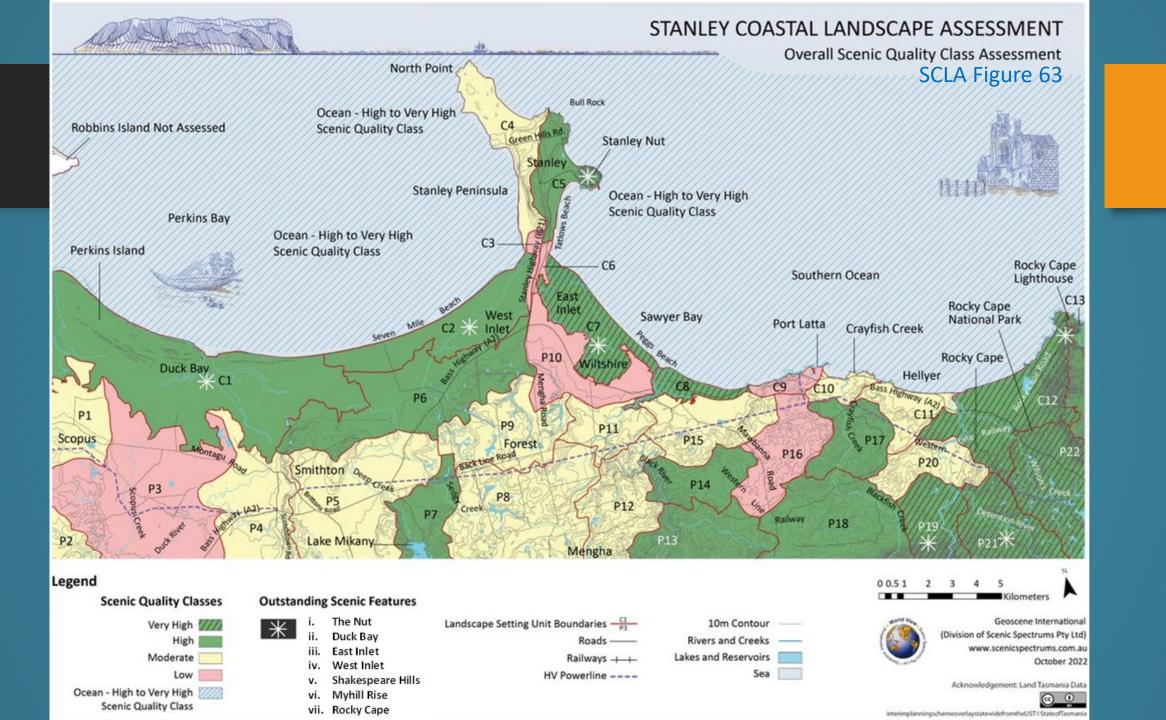
- 35 Landscape Setting Units (LSUs) within the Coastline and the Plateau & Plains Landscape Character Types (refer to SCLA Figure 9, Slide 16).
- Each LSU has been assessed for Scenic Quality based on the Relative Occurrence or Visual Influence of (refer to Part B of SCLA report):
 - Landforms;
 - Vegetation;
 - Waterforms;
 - Cultural Heritage Features (Visual Only);
 - Native Wildlife Features (Visual Only); and
 - Scenically Detracting Landscape Alterations.

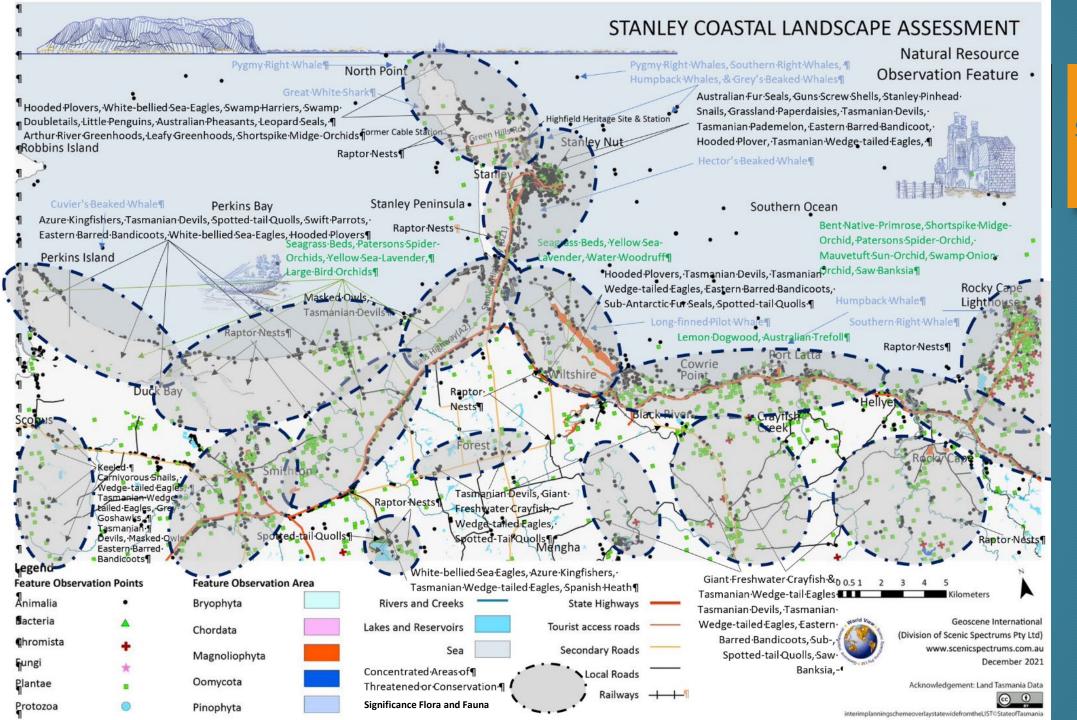


Plateau & Plains LSU Scenic Quality Assessment: Occurrence of Positive and Negative Landscape Features in Relation to Standard Deviations from the Mean Score









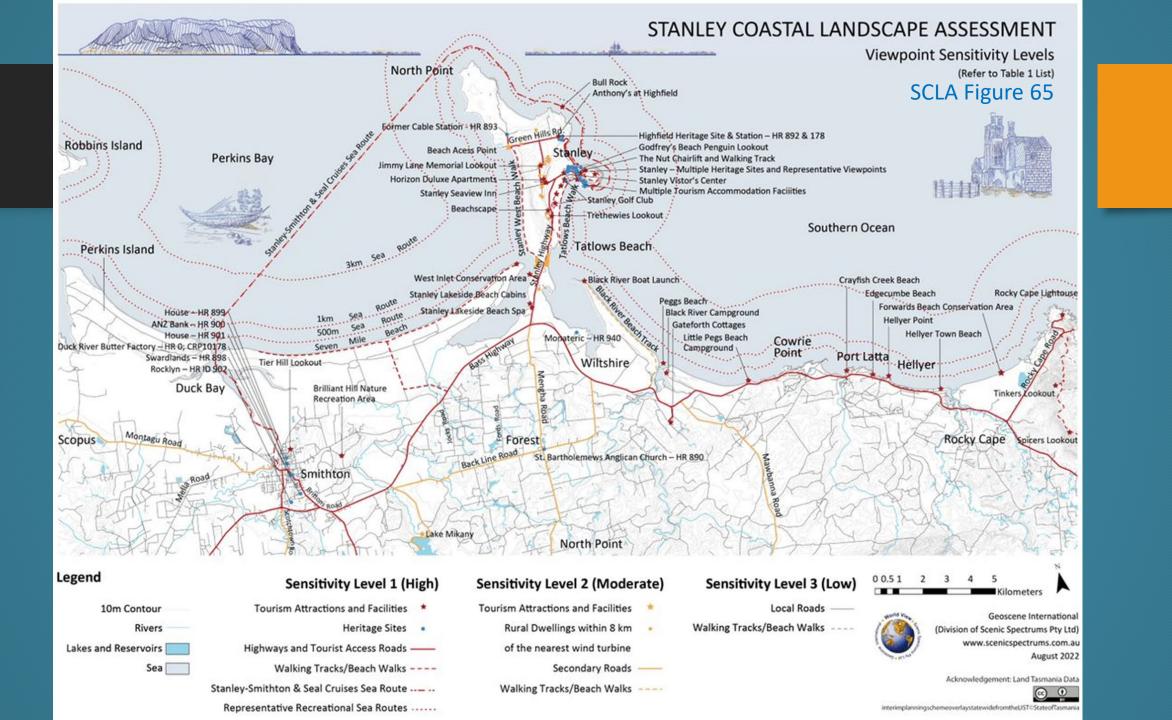
SCLA Figure 23

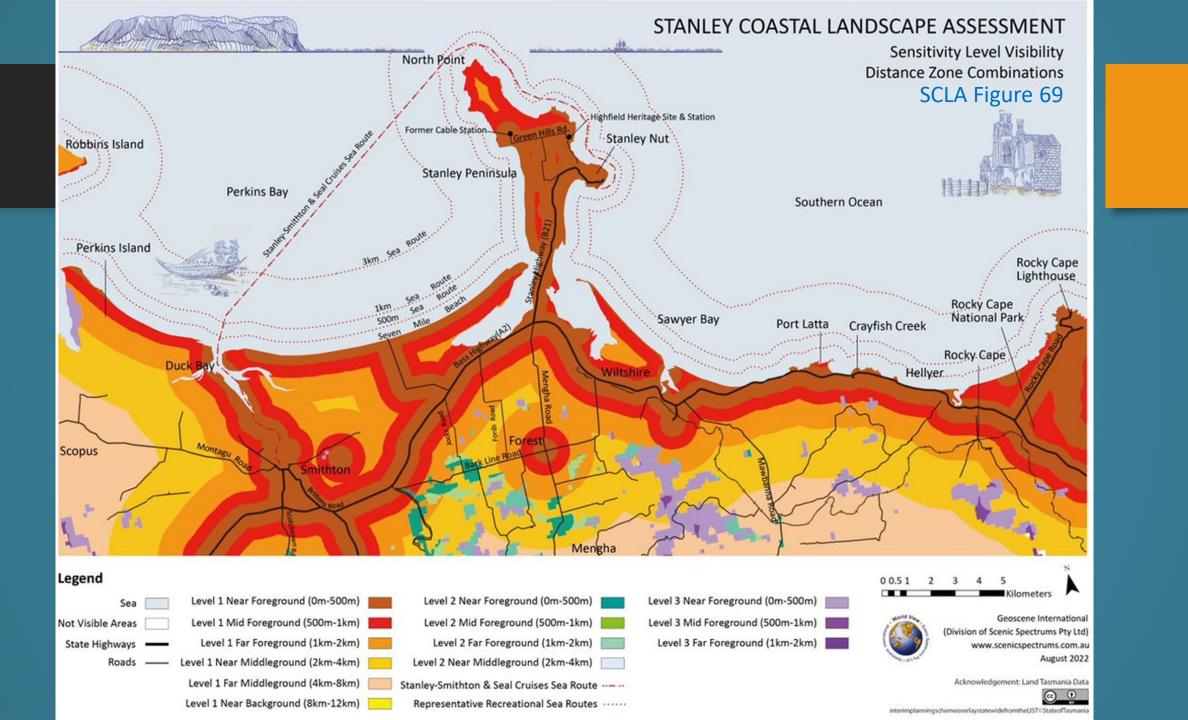
Key Findings & Recommendations: Scenic Value Areas

Scenic Value Areas (SVAs) have been assessed by combining assessments of the following factors using a combination matrix:

- Scenic Quality Class;
- Viewpoint Sensitivity Levels; and
- Visibility Distance Ranges.

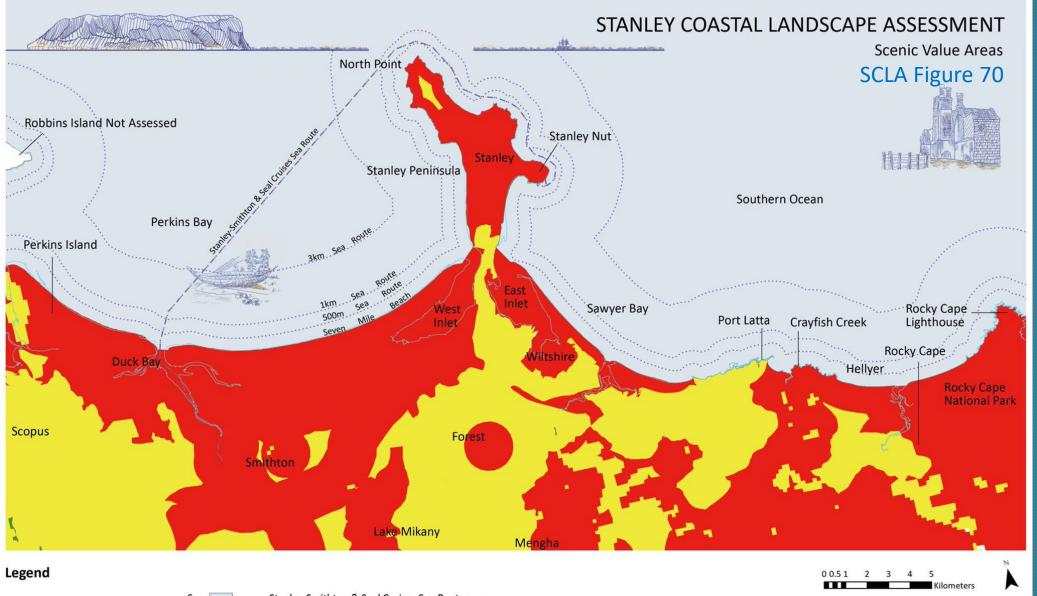
(Refer to SCLA Figures 65, 69 and 70 and Table 16 in Slides 22-25)



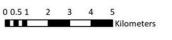


Scenic Value Area Combination Matrix

																							SCL	A Tal	ole 1	6
	Viewer Sensitivity Level –Visibility Distance Ranges																									
		1NF (0 m – 500 m)	1MF (500 m – 1 km)	1FF (1 km – 2 km)	1NM (2 km – 4 km)	1FM (4 km – 8 km)	2NF (0 – 500 m)	2MF (500 m – 1 km)	2FF (1 km – 2 km)	3NF (0 m – 500 m)	1NB (8 km – 12 km)	1MB (12 km – 20 km)	1FB (20 km – 32 km)	2NM (2 km – 4 km)	2FM (4 km – 8 km)	3MF (500 m – 1 km)	2NB (8 km – 12 km)	2MB (12 km – 20 km)	2FB (20 km – 32 km)	3FF (1 km – 2 km)	3NM (2 km – 4 km)	3FM (4 km – 8 km)	3NB (8 km – 12 km)	3MB (12 km – 20 km)	3FB (20 km – 32 km)	NV –(Not Visible)
Scenic	Very High and High	SVA 1	SVA 1	SVA 1	SVA 1	SVA 1	SVA 1	SVA 1	SVA 1	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2
Quality Class	Moderat e	SVA 1	SVA 1	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3
	Low	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 2	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3	SVA 3
Scenic Value Area Key		Scenic Value Area 1 (Very High and High Scenic Value)							Scenic Value Area 2 (Moderate Scenic Value)						Scenic Value Area 3 (Low Scenic Value)											









Geoscene International (Division of Scenic Spectrums Pty Ltd) www.scenicspectrums.com.au December 2021

Acknowledgement: Land Tasmania Data



Tasmanian Scenic Protection Code Assessment for the Southern Tasmanian Council's Authority (STCA)

- The process of assessing Scenic Value Areas reflects that developed for the STCA (Inspiring Place and Geoscene International, 2018. Refer to SCLA Figure 4 in Slide 27.)
- The preceding baseline assessments and subsequent Scenic Value Areas establish a basis for further recommended Scenic Protection Areas and the development of Optional Performance Criteria (or Visual Performance Standards) against which proposed landscape developments can be assessed to determine Development Applications as:
 - Allowed;
 - Allowed with Specified Conditions; or
 - Refused.

Stage 1: Baseline Scenic Assessments

- Landscape Character Types
- Scenic Quality Frames of Reference
- Scenic Quality Classes (High, Moderate, Low)



- Key Viewpoints & Travel Routes
- Viewer Sensitivity Levels (Levels 1, 2, 3)
- Visibility- Distance Ranges (8 Ranges: Near Foreground to Far Background)



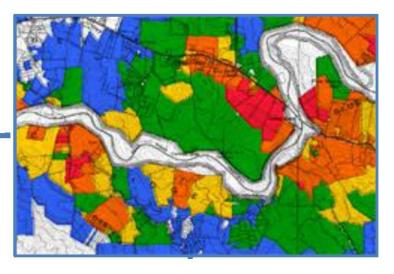
Stage 4: Development Applications (DA) – Landscape Alteration Description & Analysis

- Development Alteration Types
- Visual Characteristics
- Location
- Visibility/Distance
- Visual Magnitude



Stage 2: Scenic Value Areas

- Represents Overall Relative Scenic Value
- High, Moderate & Low SVAs (SVA 1, 2, 3)



Stage 3: Scenic Protection Areas & Scenic Road Corridors (LPS Overlay Tables)

- Exclude Non-Relevant Planning Zones
- High & Medium SPAs (High & Mod. SVAs)
- Scenic Road Corridors (from High SVAs)
- LPS SPC Management Objectives

Optional Performance Criteria (Future SPC)

- Landscape Character Settings
- Scenic Integrity/Visual Magnitude/Dominance
- Scenic Quality
- Key Landscape Features Disruption
- % Horizontal View Altered
- Exterior Colour/Reflectivity/Lighting
- Cumulative Visual Impacts
- Other Criteria as Determined

Stage 5: Assessment of Proposed Alterations Against Scenic Management Objectives

- Alteration Description (Terminology & Concepts)
- Cross-Sections, Sketches, Simulations, Photomontage as Needed
- Relative Degree of Change to Scenic Quality/Integrity
- Mitigation Options Analysis
- Mitigation Effectiveness
- Management Objectives
 Achievable with or without
 Mitigation (Yes or No)

Stage 6: Development Application Determination

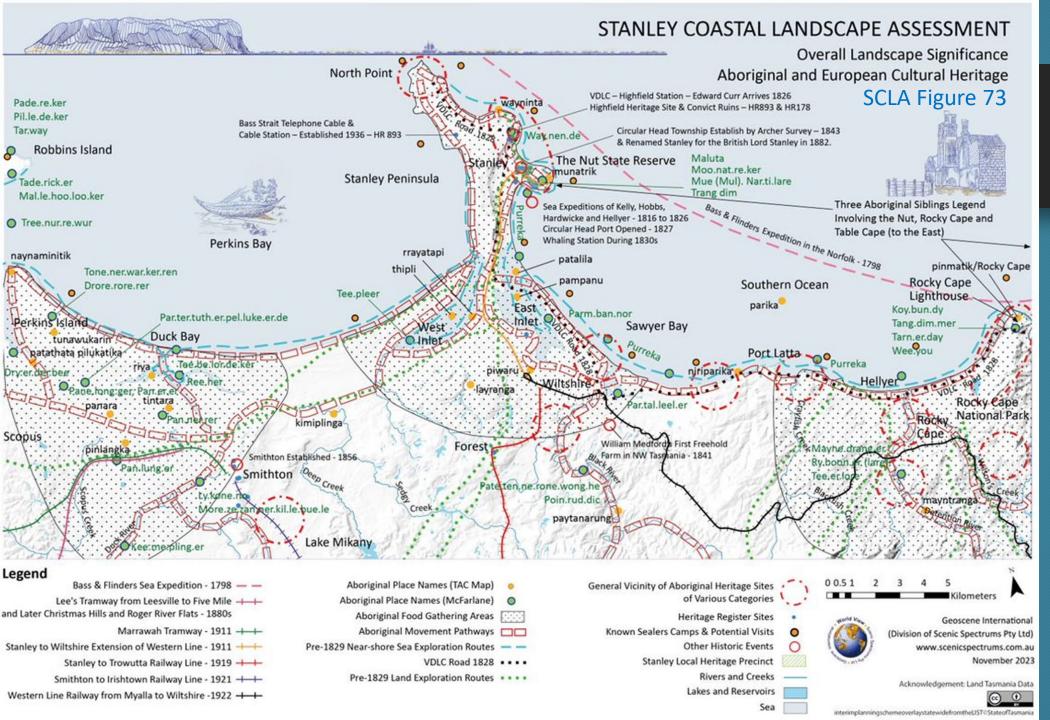
Optional Outcomes:

- a. DA Allowed
- b. DA Allowed with Specified Conditions
- c. DA Refused

SCLA Figure 4

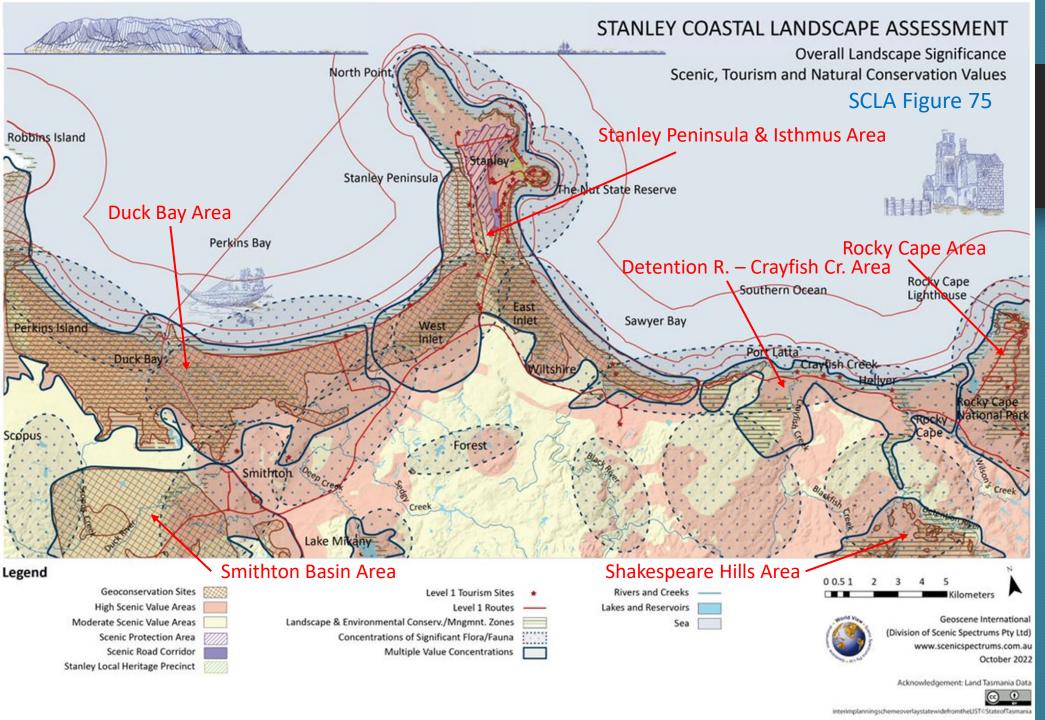
Key Findings and Recommendations: Overall Landscape Significance

- A review and summary of the relative degree of concentration and significance of combination of cultural heritage values and of scenic, tourism and natural conservation values.
- Final evaluation entails consideration of the relative Overall Landscape Significance of all resource attributes and values:
 - Evaluations of the Overall Landscape Significance of Aboriginal and European Cultural Heritage and of Scenic, Tourism and Natural Conservation Values (SCLA Figures 73 & 75, Tables 19 & 20 in Slides 29 32); and
 - Evaluation and Recommendations regarding future conservation and protection status and actions.



Three Combined Cultural Heritage Areas Assessed:

- StanleyPeninsula &Isthmus (17 –Very High)
- Rocky Cape (13High to VeryHigh)
- Duck River (10Moderate)



Six Scenic, Tourism & Natural Conservation Areas Assessed:

- Stanley Peninsula & Isthmus (54 – Very High
- Duck Bay (49 High to Very High)
- Rocky Cape (47 High to Very High)
- Shakespeare Hills (35 Moderate)
- Detention River –Crayfish Creek (34 –Moderate
- Smithton Basin (23 Low to Very Low)

SCLA Table 19

Overall Landscape Significance of Scenic, Tourism and Natural Conservation Values

Overall Landscape	Multiple Value Concentration Areas											
Significance: Scenic, Tourism and Natural Conservation Values	Rocky Cape Area	Shakespeare Hills Area	Detention River – Crayfish Creek Area	Stanley Peninsula Area	Duck Bay Area	Smithton Basin Area						
Scenic Value Area	Very High (10)	High to Very High (7)	High to Very High (7)	Very High (10)	Very High (10)	Moderate (5)						
Outstanding Scenic Features	1 – Very High (10)	2 – High to Very High (7)	0 – Low (3)	3 – Very High (10)	1 – High to Very High (7)	0 – Very Low (0)						
Tourism Attractions & Accommodation	Moderate (5)	Low to Moderate (3)	Moderate (5)	Very High (10)	Moderate (5)	Low – Very Low (3)						
Geoconservation Sites	3 – Moderate (5)	10 – Very High (10)	1 – Moderate (5)	4 – High to Very High (7)	3 – Very High (10)	5 – High to Very High (7)						
Concentrations of Significant Flora & Fauna	High to Very High (7)	Moderate (5)	High to Very High (7)	Very High (10)	Very High (10)	Moderate (5)						
Landscape Conservation & Management Zones	Very High (10)	High to Very High (7)	High to Very High (7)	High to Very High (7)	High to Very High (7)	Low to Very Low (3)						
Total Scores	47	35	34	54	49	23						
Translation to Qualitative Ratings	High – Very High	Moderate	Moderate	Very High	High – Very High	Low – Very Low						

Mote: Geoconservation Sites have been rated based on the combination of the number of individual sites, their overall geographic extent within the assessed area and their relative significance level (e. g., Global, National, State or District).

SCLA Table 20

Cumulative Overall Landscape Significance Ratings of Multiple Value Concentration Areas

Concentrated Value Areas: Aboriginal and European Cultural Heritage		Rocky Cape Area		Stanley Peninsula & Isthmus Area	Duck River Area		
Multiple Value Concentration Areas: Scenic, Tourism and Natural Conservation Values	Rocky Cape Area	Shakespeare Hills Area	Detention River – Crayfish Creek Area	Stanley Peninsula Area	Duck Bay Area	Smithton Basin Area	
Sub-Total Scores: Overall Landscape Significance of Cultural Heritage (Aboriginal + European)	13	13	13	17	10	10	
Sub-Total Scores: Overall Landscape Significance: Scenic, Tourism and Natural Conservation Values	47	35	34	54	49	23	
Cumulative Total Scores: Overall Landscape Significance	60	48	47	71	59	33	
Qualitative Translation	High - Very High	Moderate	Moderate	Very High	High - Very High	Low to Very Low	

Note: This type of cumulative assessment of overall landscape significance, involving many different types of resources and resource attributes, can never be precise. However, this type of assessment is designed to provide a reliable indicative assessment of overall landscape significance. Based on the evidence presented, the relative qualitative ratings resulting appear to present a correct picture of the relative importance or significance of the cumulative landscape attributes for the areas assessed.

Cumulative Overall Landscape Significance Ratings of Multiple Value Concentration Areas

A review and summary of the relative degree of concentration and significance of combination of cultural heritage values and of scenic, tourism and natural conservation values:

- Stanley Peninsula & Isthmus Area (71 Very High);
- Rocky Cape Area (60 High to Very High);
- Duck Bay Area (59 High to Very High);
- Shakespeare Hills Area (48 Moderate);
- Detention River Crayfish Creek Area (47 Moderate); and
- Smithton Basin (33 Low to Very Low).

Key Recommendation: Scenic Protection Code – Scenic Protection Areas

The Circular Head LPS should include the following areas under the Scenic Protection Code (SPC) as Scenic Protection Areas:

- the Stanley Peninsula Area (including West Inlet, East Inlet, the Black River Estuary and Peggs Beach areas);
- the Rocky Cape Area (including the Forwards Beach and Rocky Cape West areas);
- the Shakespeare Hills Area (including the rivers, forests, and blanket bog areas of LSUs P18, P19 and P20);
 and
- the Duck Bay Area (including most or all of LSU C1) as delineated in Figure 63 and Figure 75.

Key Recommendation:

Scenic Protection Code – Scenic Protection Areas

The Circular Head LPS should consider the following areas under the Scenic Protection Code (SPC) as Scenic Protection Areas on a more limited basis:

 portions of the Black River and Mosquito Creek within LSU 13 – Dip River Hills; and

the area immediately surrounding Lake Mikany in LSU.

Other Findings of Note: National Heritage List and Tasmanian Heritage Register

Findings regarding the six Multiple Value Concentration Areas regarding the National Heritage List (NHL) and the Tasmanian Heritage Register (THR) include:

- The Stanley Peninsula & Isthmus Area meets multiple criteria for the NHL and the THR (Cultural/Natural History, Aesthetic, Cultural/Spiritual Association, etc.;
- The Rocky Cape Area meets Aesthetic criteria and possibly Natural or Cultural History and Association with a Cultural Group for Cultural/Spiritual reasons for the NHL and THR;
- The Duck Bay Area meets the Aesthetic criteria for the NHL and possibly the THR. It possibly meets
 Natural/Cultural History criteria for the NHL Association with a Cultural Group for Cultural/Spiritual
 reasons for the THR;

Other Findings of Note: National Heritage List and Tasmanian Heritage Register

Findings regarding the six Multiple Value Concentration Areas regarding the National Heritage List (NHL) and the Tasmanian Heritage Register (THR) include:

- The Shakespeare Hills Area possibly meets NHT criteria for Natural/Cultural History and for demonstrating a class of Australia's Natural Places/Environment in terms of the Western Tasmanian Blanket Bogs and possibly meets the Aesthetic criteria for the THR;
- The Smithton Basin Area possibly meets NHT criteria for Natural/Cultural History, for demonstrating a class of Australia's Cultural regarding heritage transport and industries and technical achievement regarding it's major tramway networks. This area possibly meets THR criteria regarding a place of importance to the course/pattern and understanding of Tasmania's history, as well as being a place that demonstrates principle characteristics of a class of place in Tasmania's history.

Observations Regarding Draft Amendment PSA 2023/1

PSA/1 proposes to amend CIR-Table C8.1 Scenic Protection areas by:

- Removing CIR-C8.1.1 Green Hills Stanley;
- Including CIR-C8.1.1 Stanley Peninsula;
- Including CIR-C8.1.2 Marrawah;
- Including CIR-C8.1.3 Coastal Estuary and Islands;
- Including CIR-C8.1.4 Eastern Gateway; and
- Including CIR-C8.1.5 Sumac Lookout.

The amendment would also remove CIR-Table C8.2 Scenic Road Corridor, to amend the Scenic Protection Area Code Overlay Map, and to remove the Scenic Road Corridor Overlay Maps.

Overlap and Agreement with SCLA Areas and Recommendations

- As noted on pp. 113-114 of the SCLA report, I agree with Removing CIR-C8.1.1 Green Hills Stanley and the associated Scenic Road Corridor and maps.
- Those areas that overlap, in whole or in part, with areas recommended for application of the Scenic Planning Code via Scenic Protection Areas include:
 - CIR-C8.1.1 Stanley Peninsula;
 - CIR-C8.1.3 Coastal Estuary and Islands; and
 - CIR-C8.1.4 Eastern Gateway.
- Observations and Comments on these areas follow.

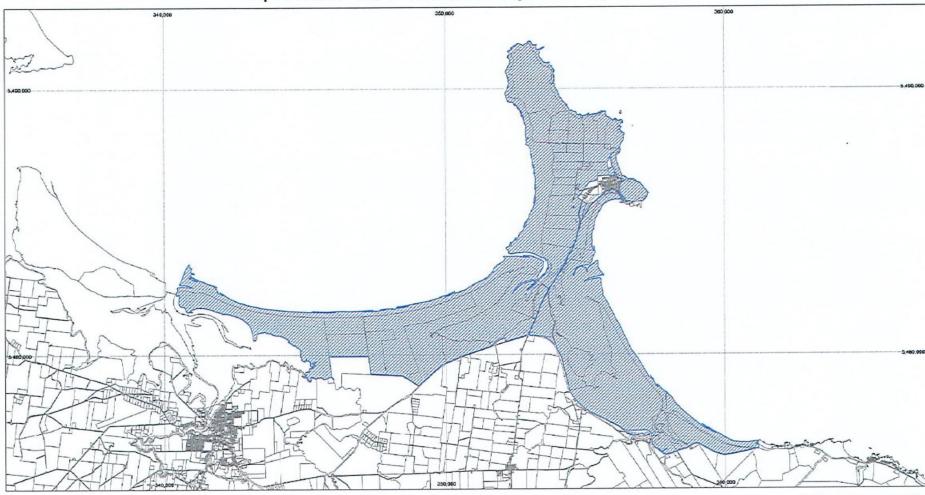
CIR-C8.1.1 Stanley Peninsula

- Very similar to SCLA Stanley Peninsula & Isthmus Area but includes some of Duck Bay Area
- The Scenic Protection Area names, descriptions and scenic values listed in the Table 1 Local Provisions are generally adequate, although the map reference to the "Stanley Peninsular" is both grammatically and geographically incorrect it is a Peninsula.
- The proposed Description states that "the village of Stanley is excluded from the SPA as a Local Historical Heritage Code already exists over this area in the Tasmanian Planning Scheme Circular Head". This statement seems to make the assumption that the Local Heritage Code adequately covers issues of scenic protection. There is no reason why the Scenic Protection Code and the Local Historical Heritage Code cannot both be applied over the township, and they probably should.
- In addition, the Scenic Protection Code does not address the broader areas of heritage significance that influence the landscape character and quality of Stanley Peninsula as a whole. As outlined in SCLA Section 5.8, a Local Historic Landscape Precinct should also be considered by the Council for application to areas of the peninsula., as mentioned previously.



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Map 1. Scenic Protection code overlays in Stanley Peninsula





Tasmanian Planning Scheme - Circular Head Local Provisions Shedule Scenic Protection Code - Stanley Peninsular







Coordinate System; GDA94 MGA Zone 55 Zone data From Circular Head Council Base topographic data from: The LIST State of Tasmania Print Date: 08/08/2023

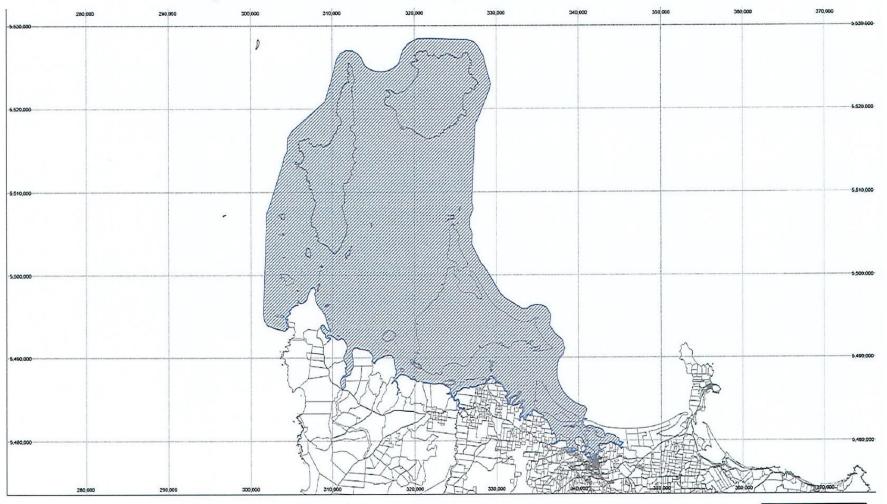
CIR-C8.1.3 Coastal Estuary and Islands

- The SCLA Duck Bay Area makes up much of the Southeastern portion of this SPA. However, it does not extend inland along the estuaries, wetlands and coastal plain as far as it should. All of Landscape Setting Units C1, C2 and P6 should be included within this SPA or within the Stanley Peninsula SPA (refer to Figures 9 and 63 for LSUs).
- The Scenic Protection Area names, descriptions and scenic values listed in the Table 1 Local Provisions are generally adequate. However, the map reference to the "Stanley Peninsular" is both grammatically and geographically incorrect it is a Peninsula.



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Map 3. Scenic Protection code overlays in Coastal Estuaries and Islands





Tasmanian Planning Scheme - Circular Head Local Provisions Shedule Scenic Protection Code - Coastal Estruaries and Islands







Coordinate System: GDA94 MGA Zone 55 Zone data From Circular Head Council lase topographic data from: The LIST State of Tasmania Print Date: 08/08/2023

CIR-C8.1.4 Eastern Gateway

- Includes much of the SCLA Rocky Cape Bay Area but omits Detention River Estuary,
 Pebbly Bay and most of the Shakespeare Hills.
- The southwest boundary appears to be an arbitrary straight line and does not seem to follow ridgelines as would be expected if it is to "extend to the visual limits of the seen view from the highway corridor (e.g., the enclosing ridges of the Shakespeare Hills)" as stated in the description. It would be improved if extended to the coast along Pebbly Bay and to include all of the Shakespeare Hills.
- This Scenic Protection Area should include all of Landscape Setting Units C12, C13, P19, P21 and P22, and should probably extend further to include LSUs P13, P14, P17 and P18, as per SCLA Figures 9 and 63.



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SA76,500 7 -6,473,500-5,472,000 5,470,500

Map 4. Scenic Protection code overlays in Eastern Gateway



Tasmanian Planning Scheme - Circular Head Local Provisions Shedule Scenic Protection Code - Eastern Gateway



382,500





Coordinate System: GDA94 MGA Zone 55 Zone data From Circular Head Council Base topographic data from: The LIST State of Tasmania Print Date: 08/08/2023

Further Observations and Comments

I support the Council's proposed Amendment PSA 2023/1 in principle but raise the following issues:

■ As per SCLA p. 21: The weaknesses and difficulties with the <u>Tasmanian Planning Scheme – State Planning Provisions</u> for C8.0 Scenic Protection Code (SPC) have been outlined in SCLA Section 4.7 (pp. 112 – 114) and have previously documented for the STCA by Inspiring Place and Geoscene International (2018). These are issues that are not referenced in the proposed Draft Amendment PSA 2023/1 (specifically in Table 1), although they have been outlined the Scenic Values Assessment and Management report (SVMR, pp. 47-52).

Refer to

- State Planning Office, 2024. Tasmanian Planning Scheme State Planning Provisions, C8.0 Scenic Protection Code. Service Tasmania, Tasmanian Planning Commission, Tasmanian Government, Weblink: https://planningreform.tas.gov.au/planning/scheme/state_planning_provisions
- Inspiring Place and Geoscene International, 2018. Guidelines for Scenic Values Assessment Methodology and Scenic Protection Code. prepared for the Southern Technical Reference Group, Southern Tasmanian Councils Authority, September 2018, 115 pp.
- Inspiring Place and Entura, 2022, Circular Head Municipality Scenic Values Assessment and Management, Section 4.2 Draft Local Provisions, p. 138.

Further Observations and Comments (continued)

- This lack of reference may be due to standard LPS protocols/formatting, however, it would seem appropriate for the Amendment to make at least a footnoted reference to the C8.0 Scenic Protection Code (SPC) of the TPS/SPP, including the following aspects that have an over-ruling effect on implementation of the SPC, including:
 - C8.4 Use or Development Exempt from this Code;
 - C8.5 Use Standards (for which there are none); and
 - C8.6 Development Standards for Buildings and Works (including the Objective, Acceptable Solutions and Performance Criteria).

Further Observations and Comments (continued)

The proposed Management Objectives are basically acceptable, but they are very broad-brush. They would not be easily implemented and would leave the Council with inadequate planning guidelines and interpretation to ensure the desired management objectives are achieved under all situations. For example, in the case of the proposed CIR-C81.1 Stanley Peninsula's Management Objectives, the following questions should be considered:

- What exactly is the "visual composition" and "landscape character" that the Council want to retain and protect?
- What type of visual impacts are likely to "permanently alter or degrade its landscape character"?
- What are considered to be the "publicly sensitive viewpoints" or how should they be defined and categorised?
- What are considered to be the "prominent features of significant scenic, cultural and social interest"? and
- How is it proposed "to minimize potential visual impact of new development or works on scenic values"?

Further Observations and Comments (continued)

- In this regard, I have provided further suggestions for the Council's development of more specific and more comprehensive landscape protection guidelines, including Visual Performance Standards (VPS) in Section 4.12 (pp. 127 132) of the SCLA report.
- These guidelines and VPS could be applied to the proposed SPAs and/or to the Multiple Value Concentration Areas identified in the SCLA (refer to Slides 30 32, Figure 75 and Tables 19 and 20).
- In general, I applaud Circular Head Council for its initiative in commissioning the SVMR assessment and for its proposed Amendment PSA 2023/1. This takes a very positive step in the direction of establishing more relevant Scenic Protection Areas for the municipality. Although I have noted some potential issues with implementation and recommended a more specific framework of SPC guidelines for their implementation, none of this is intended to criticise the Council for its positive efforts or its level of community consultation, which has been very good as far as I am aware.

Response to Questions