**Detailed Comments on the Transmission Guideline**

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| 5 Key assessment issues and considerations,  Visual Impact Assessment | Factors include the following principles that underpin the methodology …  *‘a view from a dwelling is more sensitive to change than from a local road where views are more intermittent and less frequent’.* (p22)  *‘a view from a rural dwelling is more sensitive than a view from an urban dwelling.’* (p22) | AILA does not agree with the premise that a view from a dwelling is more sensitive to change than a local road.  Public viewpoints are available to a greater number of receivers and this assumption is an oversimplification.  The AILA working group also do not agree that a view from a rural dwelling is more sensitive than a view from an urban dwelling. The justification for this being that urban dwellers are more familiar with infrastructure, such as local poles and wires, does not justify this general assumption. | AILA recommend that the sensitivity levels be revised to align more closely to bet practice and guidance from across Australia and internationally, which |
| Landscape Character Assessment | *‘The purpose of undertaking a landscape character assessment is to understand the sensitivities of the landscape and to help determine the overall impact of a project on an area’s character and sense of place.’*  *… ‘It is important that the baseline analysis is prepared in consultation with the community, local council and affected landholders to ensure that landscape values and characteristics are accurately identified.’* | Following the guidance does not address the impact of a project on the intangible elements such as ‘sense of place’.  Our members experience difficulty engaging with communities during the impact assessment phase of a project. | Suggest ‘sense of place’ be removed from the landscape character assessment. This is an issue of landscape values and it is not clear how this can be addressed through a landscape character assessment.  AILA suggest that topic specific consultation be removed from the guideline, and that the impact on landscape values and sense of place be addressed separately.  AILA suggest the DPE facilitate the preparation of community informed landscape character mapping for REZs to support the development of these areas. The possibility of meaningful and unbiased community input into the identification of the landscape character baseline is unrealistic in the context of a landscape and visual impact assessment. |

**Detailed Comments on the Transmission Guideline – Technical Supplement**

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| Glossary of terms |  | Many of these definitions do not align with recognised guidance. Suggest these either be refined to reflect other guidance for LCVIA or be qualified as being the meaning for the purpose of assessing transmission in NSW. | AILA recommend that an introductory paragraph be added that says … ‘For the purposes of the assessment of Large-Scale Transmission projects in NSW the following definitions have been adopted’ or similar. |
| Glossary of terms | Landscape character definition | AILA recommends that the definitions align with current best/accepted practice. | **Definition of Landscape Character**  *Landscape character is the distinct and recognizable pattern of elements that occurs consistently in a particular type of landscape. It reflects the unique combination of both natural and human factors that make one landscape different from another. This includes the physical elements like geology, soil, climate, flora and fauna, and the way these elements interact with each other. It also encompasses human influences such as historical, cultural, and economic activities that have shaped the land. Landscape character is an objective assessment of the physical and visual attributes of a landscape.*  **Definition of Landscape Values**  *Landscape values are the perceived, subjective qualities attributed to a landscape by individuals or communities. These values reflect the personal, cultural, social, and spiritual significance that a landscape holds for people. Landscape values are inherently subjective and can vary greatly among different observers or* groups. Landscape values can include a wide range of perspectives, such as aesthetic appreciation, cultural heritage significance, recreational enjoyment, spiritual connection, or ecological importance. |
| Private receiver | Terminology between private and public views should be differentiated. A viewpoint is typically referring to a public location, which can be experienced by the greater community, photographed and assessed. | Suggest private receivers not be called ‘viewpoint’ but ‘private receiver view’ or ‘private dwelling view’.  The term ‘viewpoint’ should be used for public viewing locations as per traditional approach to VIA. |
| 1.2 Application of the technical supplement | *‘The guideline does not apply to the augmentation of existing transmission corridors or development immediately adjacent to existing transmission lines.’ p6* | ‘Transmission corridor’ is not defined. Does this exclusion include existing large-scale transmission?  This exclusion is unlikely to be aligned with community views, as the scale of transmission such as Humelink, and CWOREZ transmission (for example) are much larger than the existing 330kV lines, and consequences on landscape character and visual amenity greater. | Suggest there be some explanation as to why this exclusion has been adopted.  It is not on the basis that there will be no visual effects / impacts as a result of the augmentation of existing transmission corridors, but perhaps to encourage the co-location of transmission line infrastructure.  A definition should be provided for ‘transmission corridor’ so it is clear when this exclusion applies.  The guideline should confirm what scale of transmission infrastructure this applies to, and what distance between existing and proposed transmission lines is ‘immediately adjacent’. |
| 1.3 General  requirements | *‘The proponent must engage with the community, including the indigenous community, … throughout the preparation of the assessment to verify the outcomes and to consult on any measures proposed to mitigate impacts.’ (p7)* | The purpose of having the community ‘verify’ the results of a technical assessment, when they are not qualified or experienced to do so, seems like it would add little value.  Furthermore, community engagement should be undertaken where there is an opportunity to influence the outcome, there is intentionally limited opportunity to influence the outcome of the visual impact assessment in this guideline.  Would add substantial time and cost to the visual assessment.  Unsure how the indigenous community could be specifically engaged on what is a very European approach to categorising and analysing landscape character and visual impact. | Suggest ‘verify the outcomes’ be removed from the guideline.  AILA recommends that a topic specific community consultation task, including engagement with the indigenous community, be excluded from the visual assessment guidelines.  Instead, surrounding land holders, the broader community, and indigenous community, should be engaged on landscape and visual issues as a part of the community engagement process and the cultural heritage assessment/indigenous engagement process, which are supported by specific guidelines. This allows suitably qualified practitioners to undertake this work within relevant policy frameworks, and positive relationships to be developed with the community and traditional owners, rather than within the context of an impact assessment. |
| 1.4 Approach to assessment, Dwellings | *‘dwellings that have development consent’*  *‘proposed dwellings that are subject to a development application’* | Risk that in locations where there are no existing transmission lines, that future houses can be identified within the Setback distance from the identified corridor, as a way of having the alignment moved away from their property (regardless of the actual views from their dwelling). | AILA recommend that dwellings that do not exist be given a lower visual sensitivity and not be subject to the Setback distances (i.e. not automatically a high visual impact) |
| 1.4 Approach to assessment, Easement affected receivers | *‘If a private landholding would host the proposed transmission infrastructure … private receivers on that land do not need to be assessed in accordance with this document.’* | It is not clear what properties will host the project infrastructure until late in the route selection and refinement process.  Therefore, this exclusion would not practically reduce the amount of private dwelling assessment that needs to be undertaken.  The transmission route and easement continues to change throughout the engagement, and design process. The LCVIA would potentially need to be revised as these changes to the footprint occur.  This could encourage developers to cross more private properties, to exclude dwellings from assessment. | Ensure this exclusion is clear in the detailed description of the methodology in sections 3 and 4 of the draft document. |
| 2. Landscape character assessment | *Study area to 5km* | Transmission projects are not likely to influence the landscape character of areas at this distance. | AILA recommend that the study area for the landscape character assessment be reduced to 1.5 kilometres, to align with the visibility mapping, or 2 kilometres which has proven to be suitable on other projects. |
| 3. Visual impact assessment framework, 3.1 Setbacks | *‘A sensitive receiver will trigger a high visual impact if it is located within the relevant setback distance* | These setbacks will effectively be a design input, that will require transmission easements to be more fully contained within the land holdings of the affected land holders i.e. potentially increasing the impact for the easement affected land holder dwellings. | Clarify that this is only for non-easement affected private views.  Provide clarification to confirm if this ‘high’ visual impact rating can be revised by applying the detailed assessment or mitigated. |
| 3. Visual impact assessment framework, 3.1 Setbacks | *‘rural areas are typically more sensitive to transmission infrastructure compared to urban areas’* | Unsure of the basis of this assumption. This conflicts with most guidelines where sensitivity of an area is increased by the number of viewers / people affected. | The AILA review group do not agree that urban areas have a lower sensitivity in all situations.  This statement should reconsidered and, if included, supported with a reference to confirm the basis upon which this assertion relies. |
| 3.2 Visual impact assessment process (p19) | *‘This method is designed to weight vertical changes in magnitude more than horizontal changes. This reflects best practice understanding of visual impacts’.* | The AILA working group not agree with this a consistent rule of thumb for visual impact assessment. | A reference should be provided to support this assertion.  Or, if this is the NSW DPE’s view, then this could be stated as such and noted to be applicable only for the assessment of transmission infrastructure in NSW (to prevent it from being erroneously applied to other project types). |
| Table 3 Viewpoint sensitivity levels and examples |  | The emphasis on private over public views is not consistent with best practice. | These sensitivity levels should be revised to ensure public domain views include some high sensitivity scenarios. |
| 3.3 Dwelling entitlements | *…‘dwelling entitlements located within the relevant setbacks.’* | It is assumed that this applies to non-easement affected dwellings within the setback only. | Further clarity should be provided to confirm that the consideration of dwelling entitlements does not apply to easement affected properties. |
| Viewshed mapping |  |  | Suggest the visibility of towers be limited to 1.5km (or whatever the study area is), as the mapping would show areas not practically visible due to the process of line of sight visibility analysis on a linear project. |
| Scoping map (p30) | *‘the location of public viewpoints and private receivers (including whether they are easement affected).* | Whether the receiver is easement affected or not won’t be known at scoping stage. | Suggest changing terminology to ‘receiver within study corridor’, this essentially is shortlisting but no dwellings can be eliminated from assessment until an easement is determined. |
| 4.2 Environmental Impact Statement, General requirements | *‘All public viewpoints and private receivers identified in the scoping report need to be assessed in some level in the EIS’.* | Implies a level of assessment for all, even easement affected dwellings, as they were identified in the Scoping stage. | Consider excluding easement affected dwellings once this is known. |
| 4.2 Environmental Impact Statement, Representative receivers and viewpoints | *‘representative viewpoints should be selected and assessed in lieu of multiple dwellings.’*  *‘Representative viewpoints should only be used for views from the public domain along public roads.’* | It is not clear when representative viewpoints can be used. | Suggest this be revised to say representative viewpoints can ‘also’ be used for views from the public domain along public roads’. |
| 4.2 Environmental Impact Statement, Setback assessment | *‘If a sensitive receiver is located within the relevant setback (and not easement affected) a photomontage should be prepared’.*  *‘Proponents should use best endeavours to gain access to private land and to prepare photomontages’.* | Unsurprisingly a challenge for AILA practitioners is gaining access to private property for the purposes of VIA. | The guidelines should clarify what is meant by best endeavours. i.e. set some parameters on number of attempts and/or timeframe. |
| 4.2 Environmental Impact Statement, Setback assessment | A dwelling can have an exception from the setback if it … *‘would not occupy more than 12 or 16 degrees for rural sensitive receivers and urban sensitive receivers, respectively.’*  *‘If the private receiver is eligible from an exemption from the setback, then a visual impact assessment should also be undertaken’* | This seems to suggest that a dwelling can be eliminated from the setback – automatic high impact – if no one tower exceeds a 12 or 16 degree threshold. Not the number of grid squares x sensitivity.  This could allow for tower micro siting to eliminate high visual impacts, as AILA practitioners have found that most close range examples were assessed as a moderate visual impact using the guideline. | DPE to clarify this exemption.  AILA suggest that the weighting of visibility differently between private dwellings in rural and urban areas does not reflect best practice, and should be removed. |
| 4.2 Environmental Impact Statement, Figure 9 Proportionate visual impact assessment |  | Indicates that all moderate or higher (assume only non-easement affected dwellings) will need field visit and photomontages. | DPE to clarify intent.  Options for alternative methods should be allowed for. |
| 4.2 Environmental Impact Statement, Calculating magnitude | Existing screening should be considered effective, and a cell is not occupied if: …  *‘existing vegetation would substantially screen (to the point where transmission towers are barely discernible through vegetation) elements of the project such that any residual view would be very intermittent’.* | This text, and illustrated examples, set a high bar for vegetation screening effectiveness.  Figure 13. Visual reference for considering the existing vegetation screening – shows some examples where cells are counted and the transmission tower is not discernible.  The AILA working group are concerned that this opens up the visual assessment to disagreement – AILA practitioners consider some of the cells shown as highlighted should not be counted/included. | AILA suggest Figure 13 be revised to allow for less screening – on the basis that the type of screening typically expected of mature eucalypts in NSW is preferred over solid blocks of vegetation that may not be characteristic of the local landscape. |
| 4.2 Environmental Impact Statement, Assessment against performance objectives | *‘If screening is proposed to mitigate an impact, a photomontage must be prepared to visualise the effectiveness of the vegetation’* | This could be many additional photomontages – on the basis that for high visual impacts ‘*all reasonable efforts’* are to be made ‘*to avoid the impact’*, and that regarding moderate visual impacts for private views … *‘visual impact mitigation should be implemented within the project corridor and / or offered to the affected landowner and should be proportionate to the scale of the impact’.* | AILA recommends that DPE qualifies the number of additional photomontages that need to be prepared to demonstrate the effectiveness of screening e.g. to a representative sample of those views experiencing the greatest impacts. |
| 4.2 Environmental Impact Statement, Assessment against performance objectives | *‘Where screening is proposed, the EIS must also include: … evidence that the proposed planting can achieve the mitigation outcomes within a reasonable timeframe’* | What evidence is expected?  What is a reasonable timeframe? | Suggest examples of what is expected to be provided as ‘evidence’ and what is considered by DPE to be a ‘reasonable timeframe’ be included.  AILA members should not be required to ‘verify’ the effectiveness of screening vegetation when there are many factors outside the designers control. It should be the proponent’s responsibility to ensure works are installed in accordance with the drawings, maintained and managed to achieve the desired screening effect. |
| 4.2 Environmental Impact Statement, Assessment against performance objectives | *‘Where screening is proposed … details of consultation with affected landowners, including evidence of how any feedback has been addressed.’ (p40)* | Consultation on specific off-site landscape treatments is typically undertaken when the project footprint is determined i.e. so we know who will be affected, and to what degree. This is difficult to do when tower positions are not fixed (as this can have a substantial effect on the magnitude of change – grid squares occupied as per the guideline).  This will add time and cost, with potential for engagement and discussions about planting being undertaken with land holders based on worst case assumptions that are then refined and the need for planting is no longer needed. | Suggest the EIS include options for mitigation, but meaningful engagement be undertaken when there is some certainty about the need for screening vegetation. This is on the basis that the preference is to avoid the impact through measures such as alignment refinement and tower repositioning, and screening being investigated when there is no opportunity to refine the design to avoid the impact. |
| 3.2 Visual impact assessment process, calculating magnitude |  | Concern that the grid system is based on a refined easement and the specific location of towers – as in the EIS we typically these are not determined so we will be assessing a worst case height and indicative tower locations. The actual impacts will vary. | This locational flexibility needs to be acknowledged in the guidelines. |

**Detailed Comments on the Large-Scale Solar Guideline – Technical Supplement**

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| Dwelling definition and entitlements | *Define dwelling and clarify assessment requirements for dwelling entitlements, in accordance with the draft Wind Energy Guidelines (2023), where relevant* | The draft Wind Energy Guidelines and Draft Transmission Guidelines require consideration of dwelling entitlements within an identified setback zone.  As the Solar Energy Guideline does not have a defined visual setback zone, it is unclear how this approach would be applied to solar energy projects.  For solar energy projects, there is a greater ability to successfully mitigate visual impacts of a solar development within the project site, compared to wind farms and transmission, due to their horizontal nature. | It is recommended that the application of dwelling entitlements to the Solar Energy Guidelines is limited to Approved Development Applications for dwellings where proposed visual mitigation measures are identified as having limited effect. If it can be demonstrated that proposed mitigation measures will provide successful screening in the future, no further assessment is considered necessary. |
| Methodology update | *Update the assessment methodology in line with the proposed approach for wind and transmission to allow a more proportionate approach that does not rely exclusively on photomontages* | The current requirement to visit all private properties that are identified for ‘detailed assessment’ through the preliminary assessment (i.e. Scoping Report) is overly arduous and leads to substantial increases in cost and time. | In particular, we recommend that digitally generated ‘wireframes’ or ‘3D modelled views’ be permitted as a standard means of eliminating as many ‘viewpoints’ as possible from requiring preparation of a photomontage (which involves visiting private residences and taking suitable photographs).  Only those ‘viewpoints’ shown to have a potential visual impact or moderate or higher (based on wireframes) should be required to have further visualisations prepared.  AILA also suggest that in the context of community sentiment in regional NSW, options that meet the needs of the assessment team be prepared and may be photomontage or other digitally generated image. |
| ‘Inset photomontage (s)’ (page 21 and page 37) |  | The guideline states:  ‘*the assessment of each viewpoint must also include a full-size 50 mm image of the area of the photomontage with the highest magnitude (see below) that more appropriately represents the view of the development from the human eye (see Appendix B),* [refer page 21.  However, the example shown in Appendix B *is not of an image based on a 50mm focal length but one that is wider and therefore depicts distortion and is not a truly ‘representative view’* [page 37].  The title on that image also states that: *‘The inset image(s) provide an accurate representation of the view when the document is viewed at 100% zoom and at arms length from the screen [page 37].* | It is recommended that:   1. the requirement for a more detailed photomontage should be based on an image equivalent to a standard 50mm focal length. That is with an aspect ratio of 3:2. 2. The example image in Appendix B be revised to reflect that change. 3. The title instead say something similar to: ‘To view each ‘inset’ photomontage most realistically (portraying most closely the view that would be seen in the landscape), enlarge each image to A3 size (on screen or in print), then, view the image at a comfortable arm’s length’. |
| Number of photomontages prepared for each private residence | The Guidelines do not clearly state on the number of photomontages (or visualisations) required. | Additional guidance on the number of photomontages would provide greater certainty, reduce the risk of multiple visits to any one property and clarify expectations of both residents and assessors. This would reduce both costs and time in the project’s development. | It is recommended that in most cases one photomontage from a ‘worst case’ vantage point at the residence is sufficient to ascertain the level of private view impact. Where possible visual professionals should discuss that selection with the property owners while at the property, however, the final selection should be by the visual professional.  More than one photomontage should only be prepared in exceptional circumstances, with a maximum of two photomontage for any one property. |