28 November 2025

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From	Laura Farrell	**Project No.**	12677938
Project Name	DWER Smiths Beach WA LVIA Peer Review		
Subject	The Smiths Beach Project Yallingup – Coastal Tourism Village Landscape and Visual Peer Review		

1. Introduction

GHD has been engaged by the Department of Water and Environmental Regulation (DWER) to undertake an independent peer review of the visual and landscape assessment work prepared for the Smiths Beach Project, located at Sussex Location 413, Yallingup, Western Australia.

This review draws on the following inputs:

- Visual and Landscape Assessments prepared by EPCAD (2021)
- Visual and Landscape Assessments prepared by Ecoscape (2022)
- Relevant sections of the Environmental Scoping Document (ESD)
- Relevant sections of the Environmental Review Document (ERD)

As requested, GHD has undertaken this review with reference to the following planning and environmental frameworks:

- State Planning Policy 6.1 – Leeuwin-Naturaliste Ridge (WAPC, 2008)
- State Planning Policy 2.0 – Environment and Natural Resources (WAPC, 2003)
- Visual Landscape Planning in Western Australia: A Manual for Evaluation, Assessment, Siting and Design (WAPC, 2007)
- City of Busselton Local Planning Scheme No. 21
- EPA Environmental Factor Guideline: Social Surroundings

I (Laura Farrell) conducted a site visit of Smiths Beach and the surrounding area including the section of the Cape to Cape Track from Canal Rocks Car Park to Smiths Beach on 13 September 2025.

1.1 Purpose of this report

This review aims to determine whether the information and conclusions presented regarding visual amenity impacts and proposed mitigation measures are policy-aligned, and sufficient to inform the EPA's assessment process.

1.2 Scope of work

The scope of this peer review includes:

- Has EPCAD (2021) Visual and Landscape Assessment (VLA) been prepared in accordance with:
  - State Planning Policy 6.1 – Leeuwin-Naturaliste Ridge (WAPC, 2008)
  - State Planning Policy 2.0 – Environment and Natural Resources (WAPC, 2003)
  - Visual Landscape Planning in Western Australia: A Manual for Evaluation, Assessment, Siting and Design (WAPC, 2007)
  - City of Busselton Local Planning Scheme No. 21
  - EPA Environmental Factor Guideline: Social Surroundings (2023)

- Has the proponent clearly identified the key visual amenity values within the development envelope
- Provide comment on the accuracy of visual interpretations of proposed development (illustrative views)
- Is the proposal design consistent with Statement of Planning Policy 6.1
- Advise how the proposal will affect the public's visual amenity of the area
- Advise whether the potential impacts on visual amenity from the proposal, in particular siting of elements within the development envelope have been accurately predicted in the ERD:
    - Wastewater treatment plant (WWTP) located at a geographical high point at the rear of the property.
    - Western holiday homes, with a design that is not recessive and siting of the buildings extends westwards into an area with low visual absorption capacity
    - Hotel/eco suites design is not recessive, with siting of the buildings west of the curve of the bay towards Smiths Point may enclose the bay, alter the natural landscape character at Smiths point and dominate beach views, rows of suites may appear stacked up the slope and create the effect of a three-storey building
    - Community hub/hotel siting of the buildings is close to the beach and may insert a dominating built element to the natural beach landscape and well-recreated area, and design is not recessive.
- Advise whether the mitigation measures proposed by the proponent to manage impacts to visual amenity are appropriate.
- Review and reference information relevant to the EPA's assessment, including the ERD and Ecoscape 2022.

1.3 Limitations

This report: has been prepared by GHD for Department of Water and Environmental Regulation and may only be used and relied on by Department of Water and Environmental Regulation for the purpose agreed between GHD and Department of Water and Environmental Regulation as set out in section 1.1 and 1.2 of this report.

GHD otherwise disclaims responsibility to any person other than Department of Water and Environmental Regulation arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described in this report (refer section 1.4 of this report). GHD disclaims liability arising from any of the assumptions being incorrect.

1.4 Assumptions

- The review is based on documentation provided to GHD by DWER, including the EPCAD (2021) and Ecoscape (2022) Visual and Landscape Assessments, and relevant sections of the ESD and ERD. No additional material has been considered unless explicitly supplied.
- The review is based on a scoping meeting with the EPA and the site visit (13 September 2025) have been completed.
- GHD has not undertaken independent verification of baseline data, modelling, or visual simulations included in the assessments.
- The review is limited to visual and landscape planning matters and does not extend to other landscape architectural, environmental, or planning disciplines unless directly relevant to visual amenity.
- GHD's review does not constitute legal advice or a formal planning determination.
- All findings and recommendations are based on professional judgement and interpretation of the materials reviewed, within the scope defined by the EPA through DWER.

1.5 Qualifications and experience

This review has been undertaken by Laura Farrell. I am a Technical Director with a dual background as a Registered Landscape Architect and Spatial Scientist. I bring extensive expertise in Landscape and Visual Impact Assessment (LVIA) and Landscape Character Assessment across Australia (in particular Western Australia), the UK, and Ireland for the last 19 years. My experience spans a wide range of large-scale infrastructure, commercial, and residential developments, including rail, motorways, transmission lines, wind farms, mining, and port projects.

I have contributed to numerous complex impact assessments for significant infrastructure initiatives. In addition to my project work, as a leading authority in my field, I deliver Continuing Professional Development courses on LVIA nationally for the Planning Institute of Australia and the Australian Institute of Landscape Architects, supporting industry capacity and best practice.

I have not been involved in the preparation of the proponent's Visual and Landscape Assessment (EPCAD 2021) or the subsequent Ecoscape (2022) review and holds no commercial or financial interest in the Smiths Beach Project. The review has been prepared independently to ensure impartiality and objectivity. Below are my qualifications:

– B. AgrSc.(Hons) Landscape Horticulture, University College Dublin
– MSc. of Spatial Information Management, Dublin Institute of Technology
– AILA Registered Landscape Architect No: 2019

2. Peer review

2.1 General note

The EPCAD (2021) report has been prepared on behalf of Smiths 2014 Pty Ltd (the proponent) to identify the potential impacts, propose mitigation and environmental outcomes as defined in *Table 5 Preliminary key environmental factors and required work* in the *Smiths Beach Project, Yallingup – Coastal Tourism Village, Environmental Scoping Document - Assessment Number: 2340 (2023)* under points 97 – 102.

The Ecoscape (2022) report was commissioned by the Smiths Beach Action Group during the public review period to provide a peer review and technical assessment of the visual landscape and environmental aspects associated with the Smiths Beach Project.

2.2 Has EPCAD 2021 VLR been prepared in accordance relevant guidance

The focus of this section is to ensure that the EPCAD (2021) VLA, in addition to relevant sections of the ESD and ERD, have been prepared in accordance with relevant Western Australian planning and environmental guidance. The review considers alignment with the following key documents:

– State Planning Policy 6.1 – Leeuwin-Naturaliste Ridge (WAPC, 2003)
– State Planning Policy 2.0 – Environment and Natural Resources (WAPC, 2003)
– Visual Landscape Planning in Western Australia: A Manual for Evaluation, Assessment, Siting and Design (WAPC, 2007)
– City of Busselton Local Planning Scheme No. 21
– EPA Environmental Factor Guideline: Social Surroundings (2023)

The review focuses on the methodology, structure, and content of each assessment, with reference to the expectations and principles outlined in the above guidance.

2.2.1 Statement of Planning Policy 6.1 Leeuwin Naturaliste Ridge

EPCAD (2021) references the Leeuwin-Naturaliste Ridge State Planning Policy (LNRSPP) as a guiding framework for assessing landscape and visual impacts associated with the Smiths Beach proposal. The report includes the policy's objectives verbatim and identifies the site as a designated tourist node within a Travel Route Corridor and an area of Natural Landscape Significance. It also acknowledges the influence of adjacent features such as the Leeuwin-Naturaliste National Park and the Principal Ridge Protection Area.

That said, in my opinion, EPCAD's interpretation of the LNRSPP lacks depth in several key areas. The policy's overarching vision is not included, and specific Policy Statements (PS) and Land Use Strategies (LUS), notably PS 1.3 and LUS 1.20, which are directly relevant to Smiths Beach, are not explicitly cited in the policy framework section. In my opinion, their inclusion would have strengthened the assessment's alignment with the policy and clarified its foundation.

In my opinion, EPCAD's Section 2.2 (The Visual Character) does make a meaningful contribution by classifying the site within three LNRSPP landscape categories: a Travel Route Corridor with Natural Landscape Significance, a corridor with Rural Landscape Significance, and an area of Rural Landscape Protection. The report also notes that a small area in the south-eastern corner of the site should be reclassified as having Natural Landscape Significance due to its topographic and vegetative qualities.

Nonetheless, I consider the integration of the LNRSPP into EPCAD's assessment framework to be limited. While the policy likely informed the broader approach to landscape character management, the robustness of the assessment could have been enhanced through more explicit application of relevant PS and LUS provisions in the development of the Visual Management Objectives (VMOs).

The Ecoscape (2022) report provides a review of the LNRSPP, including its vision, objectives, and spatial classifications. Ecoscape concludes that the proposal does not comply with the LNRSPP and that the landscape values identified in the policy will be "*significantly and permanently diminished*" at Site 413. This conclusion is supported by further analysis throughout the report, including mapping of visual absorbance capacity and key

landscape values, which demonstrate that the proposed built form would potentially encroach into areas that they have identified as having extremely low visual tolerance and high wilderness-like character.

2.2.2 State Planning Policy 2.0 – Environmental and Natural Resources

State Planning Policy 2.0 (SPP 2.0) provides foundational guidance for the protection and sustainable management of Western Australia's environmental and natural resources. It emphasises the intrinsic value of the environment and outlines key policy measures for safeguarding significant natural, cultural, and visual features, particularly within sensitive landscapes.

EPCAD (2021) demonstrates clear alignment with SPP 2.0. The policy is explicitly referenced in Section 2.1.2 of the report's Policy Framework, and Section 5.9, *focused on landscape,* is included in Appendix 1. EPCAD acknowledges the site's location within a region of natural landscape significance and applies the policy's principles by:

– Recognising the need to identify and protect high value landscapes,
– Considering the capacity of the landscape to accommodate change,
– Emphasising sensitive siting and design of development proposals, and
– Supporting the use of landscape or visual impact assessments (VIA) for proposals that may affect sensitive areas.

This approach reflects responsible planning consistent with SPP 2.0's objectives. EPCAD integrates this additional layer of policy guidance, reinforcing the importance of landscape protection in a region subject to tourism and development pressures.

In summary, EPCAD's inclusion and application of SPP 2.0 strengthens its assessment by embedding landscape protection within a recognised planning framework.

2.2.3 Visual Landscape Planning in Western Australia: A Manual for Evaluation, Assessment, Siting and Design

The EPCAD (2021) report references the WAPC (2007) Manual as the basis for assessment. This manual outlines a five-step process and three VMOs, *Best Practice Siting and Design, Protection and Maintenance, and Restoration or Enhancement of Degraded Character*, which guide how landscape character should be managed.

In my opinion, the EPCAD (2021) assessment provides only limited detail about the proposed development. It does not adequately demonstrate how potential visual changes arising from project staging, vegetation clearing, Asset Protection Zone (APZ), landscape planting, or built form have been considered, to show that the VMOs can be achieved or that visual impact can be minimised. In my opinion the report is limited in the following areas:

– No formal impact assessment of the magnitude, duration and significance of each specific visual impact is provided.
– No discussion on the whether impacts would be temporary or permanent or whether the effect would be beneficial, neutral, or adverse.
– No evidence or discussion was provided within the report of likely changes to defined landscape character.
– No timelines for development or description of changes over time including for construction stage, establishment and how the landscape will mature and develop over time, has been provided.
– A methodology on how the illustrations and Zone of Visual Influences (ZVI) were produced was not provided and this limits our ability to understand their technical accuracy.
– Little to no description of the general type of views that may result from the development such as new feature views, removal of canopied or enclosed views, screening of panoramic views, has been provided for identified viewpoints.

While EPCAD states broad compliance with the guidelines, in my opinion, the assessment lacks the robustness required given the scale of the project, the sensitivity of the site, and the value placed on the area by the community.

Refer to Appendix A for a table that summarises the response of EPCAD to the VIA report requirements.

2.2.4 City of Busselton Local Planning Scheme No. 21

EPCAD references the City of Busselton Local Planning Scheme No. 21 as the basis for assessment. The Scheme outlines specific provisions for Sussex Location 413 Smiths Beach Road, Yallingup, which guide how landscape character should be managed in relation to development.

In my opinion EPCAD (2021) responds to Clause 3(a) of Schedule 2, which requires a Visual Impact Analysis and Management Plan to be endorsed for the site, and Clause 2(g) of Schedule 8, which mandates a Visual Landscape Assessment as part of the Structure Plan. Clause 4(a) of Schedule 8 further requires that the Developable Land Area be informed by the overriding need to protect visual amenity, natural landscape, and environmental values. The site's inclusion within the Landscape Value Area Special Control Area also triggers Clause 5.4.2, which restricts development on or near ridgelines where it may substantially detract from visual amenity, considering cumulative impacts. EPCAD's assessment incorporates these provisions to demonstrate alignment with the Scheme's statutory requirements for landscape protection.

In my opinion EPCAD (2021) assessment demonstrate alignment with the statutory planning framework and landscape protection provisions of the City of Busselton Local Planning Scheme No. 21. This assessment incorporates the required visual and environmental considerations.

2.2.5 EPA Environmental Factor Guideline: Social Surroundings

EPCAD (2021) references the EPA's Guidance Statement No. 33 (2008), specifically Part D (Social Surroundings), noting the objective to ensure visual amenity is considered and that measures are adopted to reduce adverse visual impacts on the surrounding environment as low as reasonably practicable. This approach aligns with the current EPA Environmental Factor Guideline: Social Surroundings (Nov 2023), which reinforces the need to protect aesthetic, cultural, and social values from significant harm. The guideline emphasises the importance of identifying and mitigating impacts on visual amenity where there is a clear link between environmental change and its effect on people's experience of place. EPCAD's consideration of visual matters and its application of management measures demonstrate some consistency with the EPA's updated expectations for assessing and protecting social surroundings, however in my opinion this is limited for the reasons outlined in 2.2.3.

2.3 Has the proponent clearly identified the key visual amenity values within the development envelope

The EPCAD (2021) report provides a description of the site's landscape context and acknowledges the regional significance of Smiths Beach and the Leeuwin–Naturaliste Ridge. The report breaks down the area into several primary and secondary character areas as well as site-specific character units.

However, it then categorises the site into two broad "*Wilderness Quality*" areas called 'Wilderness-like' and 'Naturalistic' and outlines general character descriptions and VMOs for these two areas. The relationship and shared values between the different types of character units is not identified or described.

The report does not clearly define or justify the key visual amenity values that underpin the site's significance. Specifically:

– There is no concise statement outlining what matters most to the public in terms of visual amenity, nor is there a structured framework that identifies and ranks these values.
– Public receptor sensitivity and the relative importance of views are not assessed or prioritised, which limits the ability to understand how different user groups may be affected.
– Key view corridors and experiential sightlines from prominent public locations such as Smiths Beach, Torpedo Rocks, and the Cape to Cape Track are not explicitly mapped or analysed in terms of their contribution to visual amenity.
– While the two "*Wilderness Quality*" areas are presented, their link to specific visual amenity values is not demonstrated in a way that supports transparent decision-making.

In my opinion, while EPCAD (2023) report identifies landscape components and outlines management intent, it does not provide a clear or comprehensive identification of visual amenity values within the development envelope. This limits the robustness of the assessment.

2.4 Provide comment on the accuracy of visual interpretations of proposed development

Below are images captured by GHD, Ecoscape, and EPCAD. All photographic images by GHD were captured using a Canon 6D Mark II with a 50 millimetre fixed focal length lens on a 35 millimetre full frame format camera at a camera height of 1.6 metres using a Manfrotto MH057A5 Panoramic Head which is considered international best practice[1] for this type of photography. Existing views were represented using a panorama technique. This technique involves the stitching together of a number of adjoining images using the Adobe Photoshop software program. All images are represented with a 90-degree horizontal field of view. We do not know the technical details of the images captured by Ecoscape, and EPCAD. The below images from Torpedo Rocks and Torpedo Rocks Carpark assist in provide a direct comparison of the different photos captured. As illustrated below while there is some general alignment with the imagery used for the illustrative view at Torpedo Rocks. The imagery used as part of the viewpoint assessment differs. This should be considered when review imagery associated with the viewpoint analysis.

In my opinion the EPCAD (2021) image (refer to Figure 7) introduces a perceptual distortion that seems to understate the prominence of the headland in the view. The panoramic framing flattens spatial depth, diminishing the apparent scale and visual dominance of the headland within its setting and skews the perspective. This reduces the legibility of elements, creating an impression that does not accurately reflect the visual experience from this viewpoint.

In my opinion the images within the report may not reliably depict the views experienced on site.

Figure 1 ***Torpedo Rocks (GHD)***

Figure 2 ***Torpedo Rocks – existing view (Ecoscape 2022)***

[1] Based on *GLVIA3* (Landscape Institute & IEMA) and *NatureScot Visual Representation of Wind Farms v2.2*, which set out internationally recognised standards for accurate and consistent LVIA visualisations.

Figure 3 *Torpedo Rocks – proposed built form 3D model proposed built form 3D model (source Smiths Beach Action Group) (Ecoscape 2022)*

Figure 4 *Illustrative View from Torpedo Rocks. Proposed site layout depicting built form integration within the underlying landscape. (EPCAD 2021)*

Figure 5 *Illustrative View from Torpedo Rocks. Proposed site layout depicting built form integration within the underlying landscape, secondary image provided within report. (EPCAD 2021)*

Figure 6 Torpedo Rocks Car Park (GHD)

Figure 7 Torpedo Rocks Car Park – existing view (EPCAD)

2.4.1 EPCAD visual interpretations

EPCAD provides two artists' impressions (from Torpedo Rocks and from the Beach). Image parameters such as camera, lens type, GPS location, camera height, date, and bearing are not disclosed. Baseline photographs are not paired with the Illustrative Views. A detailed method statement on production of modelling outputs or verification steps has not been provided other than general statements about software used and survey data that was available. The Illustrative views appear to represent a view of mature vegetation. No illustrations have been provided for different stages of the development.

In my opinion on this basis, the images are illustrative only and cannot be relied upon as a technical representation of the views.

2.4.2 Ecoscape visual interpretations

Ecoscape reviews EPCAD's imagery and comments on the likely under-representation of built form scale and contrast, particularly on the western headland slopes. Ecoscape utilises qualitative overlays and massing indications, but does not present new, verified photomontages with complete metadata. The review is credible in its interpretation, but the absence of verifiable imagery limits confirmation of its accuracy.

In my opinion on this basis, the images are illustrative only and cannot be relied upon as a technical representation of the views.

2.4.3 Viewshed of Cape to Cape Track and western headland Appendix 3 EPCAD(2021)

A review of the visibility from the Cape to Cape Track was assessed through ZVI mapping for a number of locations along the track, four Line of Sight analysis, two cross-sections and a site visit with photography. The ZVI analysis was offered for the Cape to Cape Track with and without vegetation.

For this section of the EPCAD report the following information was provided with regards to preparation of the ZVIs: *"Our analysis of this location has exceeded this guidance. The exercise was undertaken using a survey accurate computer-generated virtual environment that enables comprehensive analysis of multiple sections, ZVI's and movement corridors to be assessed. These could be assessed with and without the LIDAR survey of vegetation."*

The two cross-sections provided are limited in their extent and only illustrate the context to the first built element rather than extending across the whole of the site as identified in the ESD requirement Task No. 101 refer to Table 1 "*Provide terrain cross sections from the highest point of the track west of the development, across the project site to the horizon."*

I placed little value in the Line of Sight due to no production method being provided and confusing representation.

It does not provide the parameters or method used to produce the analysis.

I did identify one location (S33°39'46" 115°00'24") (Figure 8) adjacent to the track with evidence of access that may afford a view towards the development. The view is from an outcrop with evidence of informal access by walkers. Figure 9 provides additional context with a walker illustrated on the track.

After review of the information provided and a site visit to this section of the track my opinion is that the visual interpretations presented by EPCAD (2021) provides a balanced assessment from the track.

Figure 8 ***View from elevated rocks adjacent to the Cape to Cape Track looking north-west (GHD)***

Figure 9 ***View from elevated rocks adjacent to the Cape to Cape Track looking north-west with walker on track (GHD)***

2.5 Is the proposal design consistent with Statement of Planning Policy 6.1

The following commentary relates to Statement of Planning Policy 6.1 Leeuwin-Naturaliste Ridge Policy and in particular LUS 1.21

> "*The size, nature and location of any development in the development investigation areas at Smiths Beach must be determined having regard to the overriding need to protect the visual amenity and environmental values of the area*"

EPCAD (2021) outlines precinct intentions and general mitigation measures. The documentation does not demonstrate view-based compliance testing against SPP 6.1 nor does it establish quantified, enforceable controls for height, bulk, siting, colour, or lighting. The following observations were made:

- The placement of hotel/eco suites on the mid-slope above Smiths Beach and western dwellings in areas of low visual absorption capacity is likely to be visually prominent from key public viewpoints, contrary to the requirement for built form to remain recessive and subordinate.
- Risk of skyline intrusion on views from the Beach. The WWTP location on elevated ground reduces confidence that the natural ridge profile will be maintained.
- The tailored APZ may shift vegetation structure away from the natural coastal heath pattern, introducing contrast that is inconsistent with protection and maintenance objectives.
- No realistic photomontage imagery to provide evidence outcomes.
- Commitments are general and do not demonstrate protection of night-time amenity for the beach or track.

In my opinion, the current design does not demonstrate consistency with SPP 6.1's overriding need to protect visual amenity and environmental values.

2.6 Advise how the proposal will affect the public's visual amenity of the area

In my opinion, the proposal will result in a noticeable change to the visual experience of the area, particularly from publicly accessible locations. As identified in the EPCAD (2021) report, there are numerous locations in the surrounding landscape where open or partial views toward the development site are available.

Areas to the east of the development site already contain existing development and, in my opinion, appear to have a higher capacity to absorb the type of change proposed. The proposed built form in these areas is generally viewed in the context of existing buildings, and while change will be visible, it may be perceived as an extension of the current settlement pattern.

However, the western portion of the site, particularly the area proposed for the Western Holiday Homes, is more sensitive. In my opinion, introducing built form into this area has the potential to affect views from locations that currently offer a high degree of natural character and visual amenity. These areas have a lower capacity to accommodate change, and the siting and design of buildings here will be critical.

A concern highlighted by Ecoscape (2022) was raised with regards to potential impacts to views from the western portion of Smiths Beach, noting that some views toward the ridgeline may be interrupted. In my opinion the impact on these views warrants closer scrutiny. The viewpoints, particularly in terms of how the proposed development may alter the perceived openness and natural character of the area need further understanding. I do note that an Illustrative View has been included from the Smiths Beach further to the north-east, however this is at a distance from the aforementioned location and provides a different visual context.

Overall, while the proposal includes mitigation measures and a landscape-led design approach, I believe the visual amenity impacts will vary across the site. Some areas may accommodate change more readily, while others, especially those with high scenic value and low visual absorption capacity, require careful consideration to avoid adverse effects.

2.7 Advise whether the potential impacts on visual amenity from the proposal, in particular siting of elements within the development envelope have been accurately predicted in the ERD.

In my opinion the Hotel/eco suites design is not recessive, with siting of the buildings west of the curve of the bay towards Smiths Point, which may visual enclose the bay, altering the natural landscape character at Smiths Point and dominate beach views. Rows of suites may appear stacked up the slope and create the effect of a three-storey building.

In my opinion the Community hub/hotel siting of the buildings is close to the beach and may insert a dominating built element to the natural beach landscape and well-recreated area, and the design is not recessive.

2.7.1 Wastewater Treatment Plant (WWTP)

The ERD identifies the WWTP within the infrastructure zone on the southern boundary, partially within an existing firebreak to reduce vegetation clearing. It is located at a geographical high point to the south of the property. However, it does not predict how the WWTPs' siting at a local high point may influence visual amenity, nor does it consider visibility from public viewpoints or potential screening measures.

The ERD identified the following APZ with regards to the WWTP:

– 27 m wide APZ will be created to the south-west, south and south-east of the enclosure; and
– 13 m wide APZ is to be created to the north of the enclosure.

In my opinion the ERD does not provide a prediction on the potential visual amenity impacts associated with the WWTP location.

2.7.2 Western Holiday Homes

The ERD notes community concerns regarding visual prominence near the western boundary and aims to retain existing vegetation and canopy cover where possible.

The ERD identified the following APZ modifications with regards to the holiday homes:

– Nominated areas of increased tree retention are nominated within the holiday home precincts because these locations are away from direct interfaces, where targeted tree retention of up to 40% canopy cover is proposed, provided trees are under pruned and the understorey is highly managed. It is noted that further clearing may be required for fire mitigation requirements in line with SPP 3.7.
– Of particular importance is the retention of the existing Moodjar (Nuytsia floribunda or WA Christmas Tree) around the Western Holiday homes, which has cultural significance to the local Nyoongar people.

In my opinion the ERD provides only a partial and low-confidence prediction of potential visual amenity impacts for the western holiday homes.

2.7.3 Hotel / Eco Suites

The ERD describes local vegetation and landscaping outcomes but does not predict how the siting and form of the hotel/eco suites may alter visual amenity, particularly in relation to the enclosure of the bay, slope stacking, or perceived building height.

In my opinion ERD does not accurately predict the potential visual amenity impacts of the hotel/eco suites.

2.7.4 Community Hub / Hotel (Beachfront)

The ERD acknowledges potential alteration to visual amenity from new beachfront development but does not predict the degree to which the community hub or hotel may appear dominant or contrast with the natural beach landscape.

In my opinion ERD does not accurately predict the potential visual amenity impacts of the community hub and beachfront hotel.

2.8 Advise whether the mitigation measures proposed by the proponent to manage impacts to visual amenity are appropriate

In my opinion, while the mitigation measures proposed by EPCAD are appropriate in principle, they are not sufficiently defined to provide confidence in their effectiveness in protecting visual amenity, particularly from key public viewpoints.

The proposal adopts a landscape-led site planning approach, aiming for a dispersed, low-rise built form that retains vegetation and uses materials complementary to the surrounding landscape. However, the measures remain broad and lack the necessary detail to be reliably assessed. There is no view-based testing, no quantified controls around building height or setbacks, and no clear articulation of how these measures will perform visually over time, especially in the early years post-construction when exposure is highest.

The tailored APZ is a notable concern. It diverges from the site's existing vegetation character and risks appearing as a contrasting band on visible slopes. This modification could significantly alter the Granite Heath / Open Heath / Tree Outcrop character units, yet the visual implications of this change are not addressed in the assessment.

Furthermore, the absence of a structured visual impact assessment, such as magnitude, duration, and significance of impacts, limits the ability to understand how the proposal will affect the landscape character and views. The lack of realistic and comprehensive visual simulations, especially from key viewpoints, further undermines the reliability of the proposed mitigation measures.

Overall, I do not consider the measures sufficient to reliably protect visual amenity. Without more rigorous testing, clearer controls, and a stronger alignment with the WAPC (2007) framework, the proposal leaves too much uncertainty around its visual outcomes.

3. Concluding remarks

GHD has undertaken an independent peer review of the VLA prepared for the proposed Smiths Beach Project in Yallingup, Western Australia. The review considered the VLAs prepared by EPCAD (2021) and Ecoscape (2022), alongside relevant sections of the ESD and ERD. The review was conducted with reference to key planning and environmental frameworks, including:

– State Planning Policy 6.1 – Leeuwin-Naturaliste Ridge
– State Planning Policy 2.0 – Environment and Natural Resources
– Visual Landscape Planning in Western Australia (WAPC, 2007)
– City of Busselton Local Planning Scheme No. 21
– EPA Environmental Factor Guideline: Social Surroundings (2023)

The EPCAD (2021) assessment engage with relevant policy frameworks. This assessment demonstrated alignment with several planning policies, particularly SPP 2.0. However, this assessment currently provides no reliable visual modelling.

A key limitation identified is the absence of technically verifiable photomontages. EPCAD's visualisations are illustrative and lack essential metadata such as camera location, lens specifications, and modelling methodology. Ecoscape critiques these visualisations but does not present new verified imagery. As a result, neither assessment enables independent verification of visual impact predictions, which limits confidence in the accuracy of the visual interpretations presented.

To support the review, GHD has prepared supplementary comparison imagery using best practice methods. This includes a 90-degree panoramic image captured during the site visit, compared against similar viewpoints at Torpedo Rocks from both EPCAD and Ecoscape. The comparison highlights discrepancies in scale, visibility, and contrast that warrant further consideration.

The ERD outlines a range of mitigation measures intended to manage visual impacts. While these measures are appropriate in principle, they are not sufficiently defined or tested to ensure protection of visual amenity from key public viewpoints. Specific elements of the proposal, including the siting of the hotel/eco suites, western holiday homes, and wastewater treatment plant, require closer scrutiny in terms of their potential visibility from Smiths Beach, Torpedo Rocks, and the Cape to Cape Track.

In my opinion, the EPCAD (2021) assessment provides only limited detail about the proposed development. It does not adequately demonstrate how potential visual changes arising from project staging, vegetation clearing, APZ, landscape planting, or built form have been considered, to show that the VMOs can be achieved or that visual impact can be minimised. Key view corridors and public receptor sensitivity are not adequately assessed, and the relationship between character units and visual values is not clearly articulated. While EPCAD states broad compliance with the guidelines, in my opinion, the assessment lacks the robustness required given the scale of the project, the sensitivity of the site, and the value placed on the area by the community. The assessment also lacks a documented photomontage methodology or detailed production process to support transparency and technical accuracy.

EPCAD (2021) outlines precinct intentions and general mitigation measures. The documentation does not demonstrate view-based compliance testing against SPP 6.1 nor does it establish quantified, enforceable controls for height, bulk, siting, colour, or lighting. The following observations were made:

– The placement of hotel/eco suites on the mid-slope above Smiths Beach and western dwellings in areas of low visual absorption capacity is likely to be visually prominent from key public viewpoints, contrary to the requirement for built form to remain recessive and subordinate.
– Risk of skyline intrusion on views from the Beach. The WWTP location on elevated ground reduces confidence that the natural ridge profile will be maintained.
– The tailored APZ may shift vegetation structure away from the natural coastal heath pattern, introducing contrast that is inconsistent with protection and maintenance objectives.
– Commitments are general and do not demonstrate protection of night-time amenity for the beach or track.

In my opinion, the current design does not demonstrate consistency with SPP 6.1's overriding need to protect visual amenity and environmental values.

Overall, while the proposal includes mitigation measures and a landscape-led design approach, I believe the visual amenity impacts will vary across the site. Some areas may accommodate change more readily, while others, especially those with high scenic value and low visual absorption capacity, require careful consideration to avoid adverse effects.

An assessment of landscape and visual impacts for a site of this sensitivity and a project of this scale would generally be expected to include photomontages produced in accordance with industry accepted standards for key public viewpoints, supported by a transparent production methodology. This would typically involve photomontages at construction stage, Year 1 post-construction and often at a stage where the vegetation has matured approximately Year 7.

In conclusion, the review has identified several issues that warrant further attention. The absence of photomontages limits the ability to audit predicted visual outcomes. The proposed mitigation measures lack the specificity and performance testing needed to provide confidence in their effectiveness. Further refinement of the visual assessment and mitigation strategy is recommended to ensure the protection of visual amenity in this highly valued coastal landscape.

Appendix A

Summary response of EPCAD to the VIA report requirements

Table 1 VIA report criteria

Step	Components	EPCAD (2021)
Step 1: Determine Visual Management Objectives	Describe existing visual landscape character and context	*EPCAD (2021) provides a description of landscape character units across several figures, though the consistency and integration of these units is limited.* *Figure 5 presents Site Contextual Local Landscape Character Units, while Figure 6 outlines Site Landscape Character Units. These units differ from one another, and the rationale for their delineation is not clearly explained.* *Figure 7 introduces Detail Site Landscape Significances with slightly different boundaries, but no accompanying written context is provided to clarify its relationship to the previous figures.* *Figure 8 identifies two additional character units—Wilderness-like Character and Naturalistic Character—based on topographic prominence along the ridgeline. These units do not directly align with those in Figures 5, 6, or 7, and appear to be defined by elevation rather than broader landscape attributes.* *In summary, while EPCAD identifies multiple character units, the lack of a consolidated mapping framework and clear explanation of how these units relate to one another limits the effectiveness of the character analysis.*
	Identify visual management objectives (VMO) for the site	Defined VMOs for *Wilderness-like Character* and *Naturalistic Character* areas only. Did not define VMOs to the character areas identified and described in *Figure 5 Site Contextual Local Landscape Character Units* and *Figure 6. Site Landscape Character Units.*
	Reference any prior visual landscape evaluation	References multiple historical studies and previous assessments.
Step 2: Describe Proposed Development	Analysis, describe and illustrate main visual components of the proposal	Provides very high level brief description of the development but instead focuses on the Key objectives/ Elements of the iterative design approach. No cross reference to other documents used to provide the bases of the assessment
	Include development options and alternatives	Focuses on the preferred design; iterative process described but alternatives not explicitly compared.
	Provide plans showing locations and the extent of major visual features. Include cross-sections and elevations of buildings and other major structures, showing key dimensions such as height, colours, and proposed materials.	Includes a brief overview of proposed development illustrated in *Figure 1. Key Elements of the Design Approach* and *Figure 13. Proposed Site Layout.* No details were offered on the elevations of buildings and other major structures, showing key dimensions such as height, colours and proposed materials that form the basis for the assessment. Two cross-sections are provided to illustrate the relationship between the Cape to Cape Track and the nearest edge of the development; however, these are limited in scope and do not extend across the full site or address the full range of built form elements.
	Include a projected time-line describing changes to a proposed development over a period of time.	No timelines for development or describing changes over time have been provided.

Step	Components	EPCAD (2021)
	Include Illustrations, drawings, or simulations of the proposed development should be realistic and comprehensive. They should be based on actual photography.	Two illustrative views were provided. Additional commentary on accuracy of visual interpretations is provided in section 2.4 below.
Step 3: Describe Potential Visual Impacts	List likely changes to landscape character.	The report identifies that: "*The potential changes to the landscape character were assessed using different development forms and as it was considered detrimental to the landscape to introduce an urban form, strategies for integration were adopted.*" No evidence or discussion was provided within the report of likely changes to defined landscape character.
	Identify the extent of area likely to be affected by the development (e.g. viewshed analysis).	Viewshed mapping provided; includes Zone of Visual Influence (ZVI). An analysis was offered for the Cape to Cape Track with and without vegetation. However, a description of how the viewshed analysis were undertaken and the information/parameters used for analysis were not provided other than a reference to the use of a "*…comprehensive computer model…*"
	Identify key views that may be affected by the proposal (regional and local level) and assesses changes to view.	EPCAD (2021) identifies 12 valued views in Section 2.3.3, referencing previous assessments. The report reviews a total of 70 viewpoints. However, not all of the 12 valued views were selected for detailed assessment. The omitted views appear to be more distant and potentially less impacted, but no justification is provided for their exclusion. For most viewpoints, a brief statement is included indicating whether the development is visible, and the relevant VMO is noted. Despite the breadth of viewpoints reviewed, the assessment lacks written analysis or discussion of how views may change. Each viewpoint is accompanied by a photograph with vertical lines indicating the horizontal extent of the proposed development. ZVI mapping is provided for some viewpoints, but the methodology and parameters used to generate these analyses are not clearly described. Overall, the assessment does not provide sufficient detail to understand the nature and magnitude of visual change from key public viewpoints
	Identify the main views to and from the development. Where will the development be seen from and how will it look from these viewpoints?	Of the 70 viewpoints reviewed, 2 illustrations of the proposed development have been provided. On each of the photography line are provided to illustrate the extent the development with occupy in the view.
	Describe the general type of views that may result from the development such as new feature views, removal of canopied or enclosed views, screening of panoramic views.	Generally little to no description of the general type of views that may result from the development such as new feature views, removal of canopied or enclosed views, screening of panoramic views, has been provided for identified viewpoints.

Step	Components	EPCAD (2021)
	Identify and describe likely changes to the visual landscape character and views throughout the staging of the project, with particular reference to the different stages of development operations.	A project timeline has not been provided. No discussion has been provided of impacts over time including construction, establishment and how the landscape will mature and develop over time.
	Assess the magnitude, duration, and significance of each specific visual impact.	No formal impact assessment of the magnitude, duration and significance of each specific visual impact is provided. It does identity visibility and VMO for each viewpoint.
	Assess the capacity of the landscape to accommodate the proposed development options without altering its valued visual landscape characteristics. How sensitive is the landscape to the proposed development type? Determine whether the proposed development would introduce a totally new element to the landscape or simply retain what is already there.	No structured discussion on capacity of the landscape to accommodate the proposed development or visual absorption capacity analysis provided other than some general statements about design intent: "*To address minimising adverse visual impacts, the approach to development has been to adopt Visual Management Measures as design responses rather than to consolidate significant change to an area that would then be in contrast to the character. Consolidating to an area was considered to create an intrusive urban-like element into all potential views and is an outcome that could be delivered under the current Structure Plan. To address this challenge, the Proposal has adopted landscape led site planning and design to achieve a form that can contribute to the landscape positively, creating an unobtrusive tourism facility that retains vegetation through a dispersed low rise built form and utilises materials that are complementary in colour and texture to the existing landscape.*"
	Determine if an impact will be temporary or permanent and whether the effect will be beneficial, neutral, or adverse.	No discussion on the whether impacts would be temporary or permanent or whether the effect would be beneficial, neutral, or adverse.
Step 4: Develop Visual Management Measures	Determine if objectives can be met	States that objectives are met through design; lacks performance testing.
	Propose mitigation measures (e.g. screening, siting, design changes)	Includes vegetation retention, material selection, and siting strategies.
	Use cross-sections and vegetation modelling to test visibility	Two cross-sections and some 3D vegetation modelling have been provided with regards to views from the Cape to Cape Track.
Step 5: Prepare Final Recommendations	Summarise findings and significant impacts	Embedded in design narrative; not presented as a standalone summary.
	Compare development options and their visual outcomes	Iterative design process described; alternatives not formally compared.
	Recommend conditions, mitigation, and monitoring strategies	General design principles provided; lacks specific conditions.
	Include annotated maps, tables, and graphics	Extensive mapping and visuals; lacks annotation and metadata.

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