#### Naushad Tahsildar

# ERM discusses the issues surrounding landscape and visual impact assessments in developing countries where there is an absence of international and local legislative framework.

The role of environmental impact assessment (EIA), also referred to as environmental and social impact assessment (ESIA), has been crucial to the development control process in most parts of the world since its inception in the 1970s. EIAs are formally required for certain types of projects across developed and emerging economies and implemented through a number of country-specific regulations requiring identification of significant impacts.

International Finance Institutions (IFIs) such as the International Finance Corporation (IFC), European Bank for Reconstruction and Development (EBRD) and the Asian Development Bank (ADB) also have their own environmental and social standards. These standards, in particular the IFC's performance standards, have driven international best practice and are particularly useful in developing countries where EIA regulations or guidelines do not exist or are in development.

#### Landscape and visual impact assessments (LVIAs)

LVIA is a separate but closely-linked process that operates within the overall framework of EIA. LVIA aims to ensure that all possible effects of change and development, both on the landscape itself and on views and visual amenity, are taken into account in development control decision making.

In developed countries, LVIA is more common place. Even in some developed countries, for example in the US, LVIAs are carried out intermittently. Some projects receive very detailed visualisation studies, while others do not. In such cases it depends on the legal drivers and public concern/attention to the effects of a particular development. In the US, in the last few decades there has been a growing trend of considering landscape as a cultural resource, where the term 'cultural resource' is used to refer to landscape that includes not only the landscape but also buildings, structures and other man made elements which all come together to form a culturally relevant and interrelated entity. The trend is still growing, though in general it remains an area with many gaps with no regulatory requirements and/or guidelines.

While LVIAs are more commonly, though not always routinely, undertaken in developed countries, they are often noticeable by their absence in the EIA of major projects undertaken in developing countries.

### Absence and ad-hoc inclusion in developing countries

The key reason for the omission of LVIA in developing countries is often the absence of a regulatory framework in the relevant country, as well as the absence of landscape and visual impacts as a standalone topic in international best practice guidelines and regulatory requirements. The IFC's <u>performance standards</u> and <u>environment health and safety guidelines</u> which were revised in 2012, for example, do not include explicit reference to the assessment of landscape and visual impacts from new development.

However, while it's unusual, LVIAs are sometimes undertaken in developing countries, triggered by developments in or close to ecotourism areas and areas known for scenic values or driven by international clients' internal requirements/standards. Sometimes LVIAs are driven by IFI lenders, though this may be more to do with interpretations by individual lender staff rather than lender performance standards.

On a positive note, the importance of landscape has, to a certain extent, been recognised in two new IFC performance standards, entitled:

- Cultural heritage
- · Biodiversity conservation and sustainable management of living natural resources

These standards are helpful and will increase the extent to which landscape is considered in consent decision-making and investments in new projects in developing countries, though will not necessarily bring about consideration of all landscape and visual impacts which might occur.

## Missing out on benefits

In not explicitly and routinely carrying out LVIAs in undertaking EIA for new projects, there is the potential for important aspects of the landscape and visual amenity to be overlooked, and for impacts and practical mitigation to be excluded from decision making and consenting.

Even where LVIAs are not formally required they can benefit the EIA process as a whole. Informal use of LVIA can be a very useful way of considering different forms of development or interactions between a new development and other projects that may possibly bring about environmental change <sup>(1)</sup>

This is certainly our experience as a global EIA consultancy. We have found a number of benefits of carrying out LVIAs on projects where they might not, under normal circumstances, have been undertaken. Experience from recent projects in Egypt and Turkey has shown that stakeholders and regulatory authorities were pleased to see that an assessment of landscape and visual impacts had been undertaken to better inform development control decision-making. This has set a positive benchmark for new development projects and consultation/ consenting in these local areas. The guidance used in this case was based on UK guidance with a pragmatic approach to application.

In the absence of international guidelines on LVIA, the opportunity to carry out such assessments in international EIA is being missed, even on the most significant, large-scale projects. In many cases landscape and visual issues are being considered only on an *ad-hoc* basis and the scope, methodology and quality of these assessments vary from project to project.

Where projects are developed in countries where there are no local LVIA guidelines, and in the absence of international guidelines, the most common oversight in this situation is to propose no or little consideration of landscape and visual values. Not far behind, however, is the error of insisting on doing an LVIA just how it would be carried out in a developed country, rigidly applying the associated guidelines. That can also lead to unfortunate consequences, including in the end doing nothing at all with respect to landscape and visual impacts. Therefore a pragmatic approach to carrying out an LVIA is recommended in such situations such that it benefits the EIA process and the quality of decision-making.

As a global consultancy, we are seeing a much greater need for collaboration with our social assessment colleagues to help understand how different cultures react to changes in visual amenity and landscape, as these reactions can be very different in different countries around the world. In particular, stakeholder engagement can be a very important part of assessing landscape and visual impacts from a new development (ie in some parts of the world, economic progress might be seen as far more important than landscape and views by stakeholders, while in other countries, stakeholders may feel strongly that landscape and views should be protected). We are very interested in the views and thoughts of other IAIA members and international EIA practitioners on the role that LVIA might play so as to achieve a more consistent and beneficial consideration of landscape and visual impacts in EIA and consent decisions for new development.

Naushad Tahsildar is a Principal Consultant in ERM Impact Assessment and Planning Practice, based in Oxford, UK. Naushad is an EIA specialist as well as a trained Architect and Planner, specialising in environmental assessment and management. Naushad is ERM's lead for landscape/townscape and visual impact assessments.

<sup>(1)</sup> Landscape Institute and Institute of Environmental Management & Assessment (2013) Guidelines for Landscape and Visual Impact Assessment (Third Edition).