



Australian Institute of Landscape Architects

19 November 2015

Queensland Government,
Department of Infrastructure, Local Government and Planning
State Assessment and Referral Agency (SARA),
PO Box 15009, City East, Queensland 4002

By email: windfarms@dilgp.qld.gov.au.

Dear committee,

Draft wind farm state code and guideline consultation 2015: Response by AILA Queensland

The Australian Institute of Landscape Architects (AILA) provides this letter in response to the draft wind farm state code and associated draft wind farm state code planning guideline, intended for incorporation into the State Development Assessment Provisions (SDAP).

As the national representative body for Landscape Architects, AILA represents over 2,500 active and engaged members who are shaping the world around us, committed to designing and creating a better Australia. Landscape Architects are a key profession set to tackle the challenges facing Australian cities and regions. From water sensitive urban design to coastal resilience, from transport route selection to the design of new roads, from regional landscape planning to environmental impact assessment, Landscape Architects are at the forefront.

Our members are often engaged in Environmental Impact Assessment and other forms of environmental assessment of major infrastructure developments including windfarms. This response has been prepared by members who have been engaged in preparing Landscape and Visual Impact Assessments (LVIA) in Queensland, Australia and overseas.

AILA supports the Queensland government in providing a clear and coordinated approach on the planning of wind farm developments in Queensland. We support the appointment of the State Assessment and Referral Agency (SARA) as a single lodgement and assessment point for all wind farm development applications where the state has a jurisdiction under Queensland's overarching planning legislation—the Sustainable Planning Act 2009 (the Planning Act).

AILA does, however, have some specific comments and concerns in relation to **Section 3.6 Meeting performance outcomes: visual amenity**, listed under the relevant subheadings from the draft guidelines below.

3.6.1 P07 Visual amenity

Change

'P07 Development minimises adverse impacts on identified visual amenity and or landscape values of the locality or region;



To read;

'P07 Development minimises adverse impacts on visual amenity and or landscape values of the locality or region

Context

AILA recommend that the term Landscape and Visual Impact (LVIA) assessment be used to make it clear that both visual values and impacts on the landscape as a whole are to be considered. Landscape amenity values have been a key issue that have arisen following community consultation on previous windfarm EIS.

Although there is consideration of lighting in relation to ecological and civil aviation impacts, it is essential that reference to the assessment of lighting impacts on related landscape uses be considered. The introduction of lighting into rural landscapes can be a key concern of affected landowners and needs to be considered.

We also note the necessity of considering impacts such as blade glint. This issue is separate to visual amenity and should be considered under a separate subheading with shadow flicker (PO3).

A separate issue that currently does not appear to be covered within the code is cultural heritage. We recommend that separate performance outcome(s) need to be developed in relation to the avoidance of adverse impacts on culturally significant structures, sites and landscapes.

Supporting actions

Acceptable Outcome A07.1

Change

A07.1. The following actions may support demonstrating compliance with the code:

- a visual impact assessment report that demonstrates compliance with the relevant codes and/or policies that specifically identifies scenic amenity and/or landscape values to be protected within the applicable local government planning scheme or regional plan; or
- a statement that there are no provisions in the relevant local government planning scheme or regional plan specifically identifying scenic amenity and/or landscape values to be protected.

To read;

A07.1. The following actions may support demonstrating compliance with the code:

- a Landscape and visual impact assessment report that describes the landscape and visual values of the site and wider context, including any codes and/or policies that specifically identifies scenic amenity and/or landscape values to be protected within the applicable local government planning scheme or regional plan; and



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- an assessment of the impacts on the landscape and visual values that concludes that no significant adverse impacts have been identified.

Context

We consider that demonstrating full 'compliance' with visual amenity codes and policies is likely to be impossible in the case of wind farms, due to the nature of visual impacts which cannot be empirically 'measured' but need assessment by a qualified professional. Assessment of the impact of the proposal on the visual values of the area and the likely impact of the proposed wind farm on them (including appropriate mitigation terms of location, layout and/or turbine selection/design), the impacts and their significance should then be clearly articulated to inform decision-making.

We are concerned about the implications of the second bullet point which enables the proponent to state that there are no provisions in the relevant local government planning scheme or regional plan specifically identifying scenic amenity and/or landscape values to be protected. Many authorities have not done scenic amenity assessments due to lack of resources so the absence of scenic and landscape amenity codes does not mean that these values do not exist.

Acceptable Outcome AO7.2

We note that other ancillary infrastructure such as roads have potential visual impact and these should also be identified and discussed.

Methodology for undertaking a visual impact assessment.

As noted above, AILA recommends that the term Landscape and Visual Impact Assessment be used.

AILA strongly objects to the requirement to prepare the assessment in accordance with South East Queensland Regional Plan 2005-2026 Implementation Guideline No. 8 Identifying and protecting scenic amenity values. This report evolved primarily as a tool for regional landscape planning and regional level scenic amenity protection in South East Queensland rather than a tool for the detailed assessment of proposals.

Technically, the document does not apply to the rest of Queensland (although it is acknowledged that other Queensland regional areas have adopted some of the methodology in their own regional assessments).

The methodology for the identification of scenic amenity values recommended by this document is a regional-scale methodology that needs to be carried out by the local authority at a whole-of-council level. If such a study has already been published it is a useful source of information on landscape and visual values for the windfarm assessment and should be referred to. However, if an assessment of this scale has not already been done by the relevant planning authority, it is too onerous to expect a windfarm proponent to undertake such a study.

In addition, certain data would not be available to windfarm proponents. For example, scenic preference values are based upon the SEQ public preference survey that are not necessarily applicable for, say, central Queensland landscapes. Undertaking consultation to establish new

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baseline regional scenic preference values falls beyond the scope of what it would be reasonable to expect a landscape and visual impact assessment to undertake.

Most importantly, the development assessment tools included in this report (i.e. section 5 of Implementation Guideline No. 8) are contested by key professional bodies including the Australian Institute of Landscape Architects (AILA) and are not considered suitable for landscape and visual impact assessment purposes since they are based upon simplistic quantitative techniques relying upon measurement of seen development and % change which is inconsistent with best practice for landscape and visual impact assessment.

It is recommended that the methodology refers to the need for a professional qualified and experienced in landscape and visual impact assessment, for example an AILA Registered Landscape Architect, to undertake the landscape and visual impact assessment.

Furthermore, it is recommended that the methodology be developed by the qualified practitioner based upon international best practice in EIA and LVIA for windfarm developments drawing upon documents such as the LVIA methodology associated with the Draft National Windfarm Guidelines, the Guidelines for Landscape and Visual Impact Assessment 3rd edition (GLVIA) and/or various documents produced by Scottish Natural Heritage. These documents are consistent with wider EIA methodologies relying upon an assessment of sensitivity and magnitude to determine the significance of the impact. They also facilitate assessment of more subjective elements including the design and layout of a windfarm to respect landscape pattern and topography that may significantly enhance the appearance and compatibility of a windfarm in its landscape setting.

It is noted that AILA is currently in the process of preparing guidelines for landscape and visual assessment for Queensland and, ultimately, these should be referred to although these are not available at the current time.

AILA looks forward to the findings and recommendations of the consultation.

Should you have any queries or wish to discuss please contact Katie Roberson, Queensland Chapter Manager, AILA on 0417 666 622 or katie.roberson@aila.org.au

Yours sincerely,

Shannon Satherley

AILA QLD Vice President