



Department of State Development, Infrastructure, Local Government and Planning  
1 William Street,  
Brisbane 4000  
Via Email: [windfarms@dSDLGP.qld.gov.au](mailto:windfarms@dSDLGP.qld.gov.au)

4 September 2023

**Re: State Code 23: Wind Farm development and associated planning guidance (DRAFT August 2023)**

The Queensland Chapter of the Australian Institute of Landscape Architects (AILA) welcomes this opportunity to comment on the *Draft State Code 23: Wind farm development* and associated planning guidance. We have a longstanding interest in this issue. In particular, aspects of the guidance relevant to the assessment of impacts of wind farms on landscape and visual amenity values. As evidenced by our submissions to the original draft wind farm state code made on 19 November 2015 and our recent submission in anticipation of this revised code, dated 22 November 2022.

AILA is the peak national body for Landscape Architecture and champions quality design for public open spaces, stronger communities and greater environmental stewardship. With our members, we anticipate and develop a leading position on issues of concern in the industry. AILA's newly released [Climate Positive Design Guidelines](#) and national position statement on [Urban Green Infrastructure](#) examine how landscape architecture plays an important role in developing these strategies.

Landscape Architects are the professional experts in Landscape and Visual Impact Assessment and our members are often consulted in Environmental Impact Assessment and other forms of environmental assessment of major infrastructure developments including wind farms. Our Queensland members work in accordance with the principles set out in our [AILA Guidance Note for Landscape and Visual Assessment \(June 2018\)](#). This response has been prepared by AILA members who are actively engaged by government and the development industry to provide Landscape and Visual Impact Assessments (LVIA), including wind farm developments, in Queensland, Australia and overseas.

Please find attached feedback from AILA Queensland regarding State Code 23, recommending that:

- PO15 (which replaces former policy PO9) is redrafted to ensure assessments consider all potential landscape and visual amenity values at risk of impacts. We recommend that the PO not only includes consideration of the direct impacts of the wind farm development on sites identified as having high landscape and/or scenic values but also includes consideration of impacts on identified areas that fall within the viewshed or zone of visual influence of the proposed wind farm.
- The wording of PO15 be adjusted so that where a LGA does not have overlay mapping, a landscape and visual impact assessment should be undertaken to understand the potential impact on landscape and visual values.
- Clarity is given that landscapes valued at a national or international level (for example national parks or world heritage areas) on account of their views, scenic amenity values or landscape character values, also require particular consideration in the LVIA.



- PO15 is adjusted to ensure both a landscape and visual impact assessment (LVIA) be undertaken that includes a description of the potential impacts on scenic amenity and landscape values as well as views.
- In recognition of legitimate public interest, all LVIAs should include an assessment of impacts on public views including through the production of visualisations and not just those located in an area of high scenic amenity defined by an LGA (i.e. views towards the proposal should be considered from surrounding areas that are not considered to have scenic value e.g. urban areas).
- LVIAs should be required to consider the cumulative impacts where multiple wind farms are being developed and/or are proposed in a locality.
- The wording of the second bullet in the PO15 supporting action be modified to include an assessment of how the turbines visible from public view points and/or viewing corridors impact scenic amenity values and measures to reduce the impacts.

AILA would appreciate the opportunity to remain involved in the development of this important state code and request a meeting with SARA to discuss the issues raised above. Please contact Melanie West, AILA Queensland Chapter Manager on 0417 666 622 or [melanie.west@aila.org.au](mailto:melanie.west@aila.org.au) to coordinate this with AILA.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tessa Leggo', with a small dot at the end.

**Tessa Leggo**  
AILA Queensland President



## Comments on evolution of landscape and scenic amenity policy (was PO9 now PO15)

AILA is encouraged with some of the wording of the proposed changes to State Code 23 PO15 from former PO9 that strengthens the policy in relation to state legislation as requested in our 22 November 2022 submission. However, we remain concerned that the provisions are still weaker than the July 17 code in relation to the adequate assessment of landscape and visual impacts. Our concerns include the risk that landscape and visual impacts will not be adequately considered in an assessments and that communities and landowners will not be adequately informed about potential impacts on views and landscape values. A comprehensive and transparent assessment process is a fundamental requirement for social licence to operate and will be increasingly important in ensuring the long term viability of renewable energy projects across Queensland. We consider, based on our experience conducting recent LVIAs, that community concern associated with the potential landscape and visual impacts of wind farms will become increasingly more prevalent, as more projects are constructed in Queensland.

To enable ease of comparison we set out below a table comparing the current and former codes for ease of reference in our commentary that follows:

<b>DRAFT State Code 23: Wind Farm Development August 2023</b>	<b>State Code 23: Wind Farm Development (v3.0) February 2022</b>	<b>State Code 23: Wind Farm Development July 2017</b>
<b>State Code PO15</b>	<b>PO9</b>	<b>PO15</b>
<b>Areas identified by a state or local government as having high scenic amenity</b>	<b>Areas identified by a local government as having high scenic amenity</b>	<b>Character, scenic amenity and landscape values</b>
PO15: Development in an area identified by state or local government planning instruments as having high scenic amenity is sited and designed to protect the scenic amenity and landscape values of the locality and region.  <i>(Note: emphasis from policy)</i>	PO9: Development in an area identified by a local government as having high scenic amenity is sited and designed to protect the character, scenic amenity and landscape values of the locality and region.	PO: Development avoids, or minimises and mitigates, adverse impacts on the character, scenic amenity and landscape values of the locality and region through effective siting and design.
<b>Performance Outcome:</b> No acceptable outcome is prescribed	<b>Performance Outcome:</b> No acceptable outcome is prescribed	<b>Performance Outcome:</b> This Performance Outcome seeks to ensure that wind farm development minimises impacts on landscape and visual amenity values, particularly landscapes recognised as being of local importance. It also seeks to ensure that the wind farm and its component infrastructure are designed to minimise



		impact. No acceptable outcome is provided.
<b>Planning Guideline</b>		
<b>Context</b>	<b>Context</b>	<b>Context</b>
<p>This performance outcome only applies to areas identified in a state or local government planning instrument as having high scenic or landscape amenity.</p> <p>In order to access a suitable wind resource, wind farm developments may be located in exposed and highly visible areas (such as ridgelines and hilltops) which may be identified by a local government as having particular scenic amenity. The height and potential scale of wind farms and wind turbines creates an unavoidable level of visibility which may impact on local perceptions of scenic amenity.</p>	<p>This performance outcome only applies to areas identified in the relevant local government planning scheme as areas of high scenic amenity.</p> <p>In order to access a suitable wind resource, wind farm developments may be located in exposed and highly visible areas (such as ridgelines and hilltops) which may be identified by a local government as having particular scenic amenity. The height and potential scale of wind farms and wind turbines creates an unavoidable level of visibility which may impact on local perceptions of scenic amenity.</p>	<p>In order to access a suitable wind resource, wind farm developments may be located in areas of high scenic amenity or landscape value. The height and potential scale of wind farms and wind turbines creates an unavoidable level of visibility, and may impact on local perceptions of scenic amenity or landscape value. A visual assessment should be undertaken to understand and minimise the impact of a wind farm project on landscape significant to the local community. The visual assessment should not only include the turbines structures themselves, but also include the ancillary structures including wind farm monitoring towers and electrical infrastructure connecting wind turbines and substation(s).</p>
<b>Supporting action – PO15</b>	<p><b>Meeting acceptable outcomes and performance outcomes: Character, scenic amenity and landscape values</b></p> <p><b>PO9 Areas identified by a local government as having high scenic amenity</b></p>	<p><b>Meeting acceptable outcomes and performance outcomes: Character, scenic amenity and landscape values</b></p> <p><b>PO9 Character, scenic amenity and landscape values</b></p>
<p>If the relevant state or local government planning scheme has identified the site in an area of</p>	<p>A visual impact assessment report is required to demonstrate compliance with PO9.</p> <p>The report must:</p>	<p>Demonstrating compliance with this performance outcome of the code may include, but is not</p>



<p>high scenic amenity, a visual impact assessment report is required to demonstrate compliance with PO15. The report must:</p> <ul style="list-style-type: none"> <li>• include visual simulations or photomontages demonstrating the anticipated visual appreciation of the proposed turbines from key public viewpoints and viewing corridors</li> <li>• an assessment of how the turbines visible from view points and/or viewing corridors does not adversely impact on the scenic amenity.</li> </ul> <p><b>Methodology</b> Not defined</p>	<ul style="list-style-type: none"> <li>• include a description of the potential impacts on scenic amenity or landscape values</li> <li>• identify and propose measures to avoid or minimise adverse impacts from the development on scenic amenity identified by a local government, including view corridors and viewpoints</li> <li>• include visual simulations or photomontages demonstrating the anticipated visual impact of the development in the context of the surrounding area, and from key public viewpoints.</li> </ul> <p><b>Methodology</b> Not defined</p>	<p>limited to, the following actions:</p> <ul style="list-style-type: none"> <li>• Undertake a visual impact assessment report that identifies and proposes measures to avoid or minimise adverse impacts from the development on significant landscape values and scenic amenity, including view corridors and viewpoints. The relevant local government planning scheme or regional plan may assist in identifying scenic amenity and/or landscape values to be addressed.</li> </ul> <p><b>Methodology</b> In order to address the impacts on scenic amenity or landscape values, a visual assessment should take into consideration the Queensland Government's (2007) Identifying and protecting scenic amenity values. The visual assessment report should include the following content:</p> <ul style="list-style-type: none"> <li>• a description of the potential impacts on scenic amenity or landscape values</li> <li>• visual simulations or photomontages demonstrating the anticipated visual impact of the</li> <li>• development in the context of the surrounding area, and from key public view points</li> <li>• a landscaping plan that details any proposed measures such as materials, finish or colour</li> </ul>
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		<ul style="list-style-type: none"> <li>• which are intended to minimise visual impacts of associated wind farm structures.</li> </ul>
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AILA supports the Department of State Development, Infrastructure, Local Government and Planning's aim to protect landscape and visual values across the State, including the values of areas identified as having high scenic amenity values in a state or local government planning instrument. However, we are concerned about the implications of the revised wording for the following reasons:

**Trigger for assessment**

The current interpretation of the revised PO15 (former PO9) is that the code only applies if the actual site/part of the site is located in an area identified as having high scenic amenity values in a state or local government planning instrument. Limiting the Code trigger to the actual site and not the project viewshed will expose high scenic amenity and landscape values to risks of impact and does not align with how a community views the landscape and scenic values of an area or region. As the Queensland Government will appreciate, the visibility of large structures such as wind turbines, that are typically between 240m and 300m, can extend for many kilometres (in practice, up to and beyond 30 km) from the Site, potentially affecting scenic amenity values for an extensive area, including in parts of an LGA or an adjacent LGAs located well beyond a project site boundary that may fall within an area identified as having high scenic amenity.

The AILA considers that the correct interpretation of this code needs to be expanded as follows to ensure protection of landscape values and to give certainty to developers and practitioners undertaking a landscape and visual impact assessment.

- *Recommendation: AILA recommends that PO15 (former PO9) is redrafted to ensure assessments consider all potential landscape and visual amenity values at risk of impacts. We recommend that the PO not only includes consideration of the direct impacts of the wind farm development on sites identified as having landscape and/or scenic values in a state or local government planning instrument (e.g. high scenic amenity overlay or 'high landscape value area) but also includes consideration of impacts on identified areas that fall within the zone of visual influence of the proposed wind farm.*

**Consistent scenic amenity baseline**

The AILA is concerned that the mapping of scenic amenity, landscape and visual amenity values is not sufficiently advanced across all Queensland LGAs to provide the baseline required to ensure the assessment of impact is equitable across the state.

Many (if not most) LGAs in Queensland have not undertaken a scenic amenity study and those studies that do exist vary in their currency and have not been prepared at a time when large scale renewable energy projects such as wind farms were envisaged. Those councils that have



undertaken scenic amenity studies have not necessarily developed these into scenic amenity values of the LGA as a mapped overlay or formally adopted the findings of these studies. This is particularly the case in the most rural LGAs, which may not have sufficient resources to commission a comprehensive scenic amenity study. There is a risk that high landscape and scenic amenity values important to the community will be missed as a result of the code's reliance on mapped values where it is known that these values are not adequately mapped across the state. The role of the Landscape Architect, as a landscape character and visual assessment expert, is to identify these values, in consultation with the LGA and community, to ensure those landscape and scenic amenity values considered important to the local community are adequately considered.

Furthermore, as many LGAs have policies within the strategic framework of their planning scheme that seek to protect 'scenic amenity and character', including authorities that list the types of landscape features considered to be of value (e.g. forested ridges), which are not mapped as 'areas', these values and areas should be identified within the project viewshed as part of the impact assessment process. These provisions should be recognised in some form and trigger a proportionate landscape character and visual impact assessment.

The AILA recommends that the requirement for an assessment not be limited to mapped high scenic amenity landscapes, in LGA's that do not have any scenic amenity mapping (or equivalent such as high landscape value area), but should be extended to require a suitably qualified landscape and visual assessment expert to prepare a baseline that takes into consideration the mapped as well as community and / or professionally identified areas of high landscape and scenic amenity values.

- *Recommendation: AILA recommends that, at a minimum, the wording of PO15 be adjusted so that where a LGA does not have overlay mapping a landscape and visual impact assessment should be undertaken to understand the potential impact on landscape and visual values.*

### Recognition of national and/or international scenic amenity values

The wording of PO15 focuses on areas of local and state scenic value and does not explicitly recognise areas that may be mapped or recognised at national or international level. As it does not always follow that values recognised at a higher scale are reflected in State policy or local planning schemes, there is a risk that impacts on the landscape character and scenic amenity value of these areas may be missed.

For example, the code does not mention other designated protected areas such as national parks (many of which have management plans which acknowledge the scenic value of these areas) or World Heritage Areas. As these protected landscapes are not often mentioned in State policy and are not managed by the relevant LGA the local planning scheme will often be silent on the scenic amenity value of these areas, so they will not necessarily trigger an assessment under the State Code as currently drafted (although may require an EPBC PER assessment).

- *Recommendation: AILA recommends that landscapes recognised at a national or international level on account of their views, scenic amenity values or landscape character values (including national parks) are noted in PO15.*



## Landscape character values

Where triggered, the PO15 planning guideline requires production of a visual impact assessment report. The associated requirements relate solely to visual impact assessment. There is no mention of landscape impact assessment in the supporting action. As the assessment of scenic amenity and landscape are separate (albeit related) processes, AILA recommends that this be redrafted to say *landscape and visual impact assessment report* given the emphasis of the Code to ensure wind farm development "is sited and designed to protect the scenic amenity and landscape values of the locality and region" We also recommend that the wording is revised to require a landscape and visual impact assessment (LVIA) that addresses both of these separate but interrelated issues.

- *Recommendation: AILA recommends that PO15 is adjusted to ensure both a landscape and visual impact assessment be undertaken that includes a description of the potential impacts on scenic amenity and landscape values.*

## Local views obtained by residents and communities and cumulative visual impacts

By focussing only on scenic amenity areas identified in State policy or a local planning scheme, it appears that PO15 can be addressed without adequately assessing the impacts of wind farms on the views and landscape experience of local people generally, unless the wind farm site is located in an area of high scenic amenity. The former July 2017 code (PO9) recognised that wind farms "may impact on local perceptions of scenic amenity" and required the assessment "to understand and minimise the impact of a wind farm project on landscape significant to the local community". Views that are important to a local community often include areas that are not necessarily included in a scenic overlay. The potential landscape and visual impacts of wind farms are consistently raised by local communities as a major concern. Undertaking a full LVIA, including producing visualisations from a range of public locations that are likely to be experienced by people in the area of all proposed wind farms, enables a local community to understand the likely visual impact and provides some confidence in the assessment process.

The code as currently written means that Queensland communities (in contrast to communities in other states such as NSW) may not have access to transparent information about how a wind farm proposal will affect views in their area. With the need to achieve a social license to operate wind farms becoming an increasing issue across the state, this approach risks an inconsistent approach to the assessment and communication of issues that are of greatest concern to communities. Indeed the need to consider landscape character and visual impacts of large scale wind farm projects individually and cumulatively becomes greater as wind farms (and other infrastructure e.g. electricity transmission lines and solar farms) proliferate throughout the state, strengthening the need to provide assessments supported by clear illustrations and photomontages.

- *Recommendation: AILA recommends that all LVIAs should include an assessment of views including through the production of visualisations and not just those located in an area of high scenic amenity defined by State policy or an LGA. We also recommend that there is a requirement to consider the cumulative visual impact of wind farms in communities where multiple wind farms (and/or other forms of large scale infrastructure) are in existence and/or proposed.*

## Assessment requirement





The code as currently written requires that the visual impact assessment includes an assessment of *how the turbines visible from view points and/or viewing corridors does not adversely impact on the scenic amenity*. Since it is acknowledged that large turbines will inevitably be visible in most situations and it is generally not possible to screen them through the application of mitigation measures such as vegetation planting due to their scale, the purpose of a visual impact assessment should be to identify how the turbines actually affect scenic amenity values and what measures have been taken to reduce this impact (i.e. relocating turbines). In most cases it is not reasonable to demonstrate t no adverse impacts but a reduction in impacts may be possible.

- *Recommendation: AILA recommends that at a minimum the wording of the second bullet in the PO15 supporting action be modified to state:*
  - *Include an assessment of how the turbines visible from public view points and/or viewing corridors impact scenic amenity values and measures to reduce the impacts.*