

Preserve And Protect Barossa - Southern Barossa Winery & Tourist Accommodation Project (SBWTAP) Environmental Impact Statement (EIS) Submission

November 2025

Glossary

Code	Planning and Design Code
CPA	Character Preservation Act
CPD	Character Preservation District
DO	Desired Outcome
EIS	Environmental Impact Statement
FBI	Fire Behaviour Index
ODASA	Office for Design and Architecture SA
PO	Performance Outcome
PDI Act	Planning, Development and Infrastructure Act 2016
SACFS	South Australian Country Fire Service
SATC	South Australian Tourism Commission
SBWTAP	Southern Barossa Winery and Tourism Accommodation Project
SLP	Significant Landscape Protection
SPC	State Planning Commission
WWTP	Wastewater Treatment Plant

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Executive Summary

At its heart, this submission is about what Barossa stands for. The Character Preservation Act (CPA), Character Preservation District (CPD) and Significant Landscape Protection (SLP) overlay were created so that vineyards, open rural landscapes and small townships remain the focus of development decisions, not a backdrop for large resort-style projects. Barossans see these laws as a promise to past, present and future generations; the developer calls them '*challenges posed*' that the project '*responds to*', treating hard-won safeguards as hurdles to be cleared.

On a plain reading of the CPA, CPD, SLP overlay and the Planning and Design Code, a six-storey, 1,000-person resort on protected rural land is the opposite of what these tools are meant to deliver. The Code expects primary production and rural character to remain dominant, with any tourism clearly subordinate, visually recessive, and directed to townships or designated tourism zones, not standing alone in the Rural Zone as what is effectively a new mini-town. The Supreme Court's Geber decision confirms that this is not the kind of development the Rural Zone is intended to accommodate.

The submission also asks a simple question: if the region already has Novotel, Nexus Barossa, Oscar Seppeltsfield and other high-end projects in the pipeline, and the South Australia Tourism Commission's latest data show a healthy but not capacity-constrained market, why force another large resort into the CPD and SLP overlay instead of placing it in one of the townships that are actually zoned for it? The key demand report has been kept confidential, the economic case leans on dated strategies, and the EIS does not show any clear, unmet market that could not be served from safer, better-connected locations.

For locals, the risk is that this becomes a self-contained '*destination resort*' that pockets most visitor spend on-site while leaving main streets, small businesses and already-tight housing and labour markets to absorb the downsides. The EIS itself flags pressure on housing, rising costs, and staff poaching, but offers little comfort on how these impacts would be managed in a community already worried about affordability, workforce gaps, and the next generation's ability to stay in the valley.

Safety and landscape are another fault line between local expectations and the proposal. Barossans read the CPA, CPD and SLP as a clear signal to keep big, people-intensive projects away from high-risk bushfire hillsides and to protect the valley floor and hills face as a coherent rural landscape and potential World Heritage setting. Here, the EIS proposes to put more than 1,000 people on slopes with a '*Very High*' bushfire rating, a single compromised escape route, untested evacuation arrangements and no commitment to the expert's recommendation to close on Extreme as well as Catastrophic days.

Processing SBWTAP through a State-led, impact-assessed pathway has also sidelined the Barossa Council's detailed local knowledge and reduced the level of scrutiny normally applied to projects of this scale. At the same time, the proposal's stacked, urban-style hotel block falls well short of the landscape-led, Barossa-responsive design quality that would be needed to justify such a large built form in the CPD and SLP overlay.

The submission also points out that world-class wine regions, including those where InterContinental Hotels Group operates, almost always locate major hotels in towns rather than in the middle of working vineyards, both to protect landscape character and to reduce biosecurity risks such as phylloxera. Barossa's CPD and SLP overlay framework aims for exactly that pattern: townships as the natural homes for resorts, and vineyards as the protected engine room of the regional economy and identity.

In short, Barossans are not saying '*no*' to growth; they are saying '*put it in the right place*'. The CPA, CPD, SLP overlay, and relevant Code provisions are seen locally as positive, community-backed tools that maintain the balance between tourism, farming, and landscape. The Southern Barossa Winery and Tourist Accommodation Project proposal reads those same tools as obstacles, asks the Minister to set them aside for one resort on one rural hillside, and, in doing so, risks the very character, safety, and long-term opportunities that make the Barossa special, while setting a precedent that could weaken planning safeguards across South Australia.

Omissions and Inaccuracies

Report Withheld, Demand Case for Project Unproven

'Hotel demand for the Southern Barossa Wine and Tourist Accommodation Project has been assessed on the basis of a Scoping Study undertaken by Hotellerie' (Appendix 3, p 6, section 1.2.2 Hotel Demand Analysis).

The study *'supports the rationale and scale of the proposed resort development'* (Appendix 3, p 13, section 2.3 Rationale for hotel component).

'Strategic Alliance engaged a hotel consultant, Hotellerie, to undertake a Scoping and Feasibility study to determine the demand and level of tourist accommodation required in the Barossa Valley region.' (EIS, p 13, section 4.3.1 Project Evolution).

The Hotellerie scoping and feasibility report, which underpins the proponent's claimed demand for SBWTAP, has not been provided for public scrutiny and remains confidential (Appendix 3, p 5, section 1.1 Purpose of this report) despite requests for its release. This lack of transparency sits uneasily with the EIS Assessment Requirement that '*any*

technical and additional information relevant to the EIS that is not included in the text should be included in appendices' (Assessment Requirement EIS, p 17, section 5.9) and prevents decision makers and the community from testing the robustness of the hotel demand rationale, and proper scrutiny of the report's claims.

The proponent provides only selective, redacted material, preventing adequate examination of its methodology, findings, and limitations, and rendering the socio-economic assessment incomplete and unreliable. This lack of transparency and accountability in presenting critical evidence fundamentally undermines confidence in the decision-making process.

The Hotellerie study from 2023 is cited in the EIS as having *'identified that: Whilst record visitation has continued to grow within the region, the constraint in the market is the lack of accommodation offerings'* (EIS, p 13, section 4.3.1 Project Evolution). However, SATC's Barossa Regional Profile shows that by year-end December 2024, total overnight visitors to the Barossa were 244,000, down 23% on December 2019 and almost 29% on December 2023, indicating that visitation has softened rather than continued a record growth trajectory. Over the same period, average accommodation occupancy across the wine regions (including Barossa) was 61% in 2019, fell to 44% in 2020, and recovered to 65% in 2022–23 (primarily due to the Riverland floods increasing visitation to Barossa) and then eased back to 60% for Barossa in 2024 suggesting a generally healthy but not *'capacity constrained'* market. (SATC's Barossa Regional Profile YE Dec 2024).

Moreover, the recently refurbished 4.5-star award winning Novotel Barossa Valley Resort already provides 140 rooms, a luxury full-service Endota day spa, restaurant and bar, extensive conference facilities, and a wide range of leisure amenities, all adjacent to the championship Tanunda Pines Golf Course (currently undergoing major upgrades to an elite standard) overlooking the Jacob's Creek vineyards and adjacent to the world famous visitor centre. This existing resort offers a broader mix of facilities than the proposed SBWTAP hotel and spa alone. Yet, there is no evidence in the EIS that the Novotel is operating at or near capacity year-round, further undermining the claim that a fundamental shortage of high-quality rooms is the primary constraint on Barossa tourism growth.

The SATC profile further notes that *'a significant challenge for the Barossa is that awareness rarely extends beyond food and wine experiences'*, so the region is widely perceived as *'for drinkers only'* and *'a place for a short stay or long weekend only'*, with the perception that *'wine alone couldn't fill a holiday'*. These findings point to demand-side and product-mix constraints, limited breadth of experiences and reasons to stay longer, rather than a simple shortage of beds as the primary brake on performance. Taken together, this evidence calls into question the EIS claim that accommodation supply is the key constraint. Instead, it suggests that Hotellerie's conclusion is at best

time-bound and, at worst, misaligned with more recent SATC data (SATC's Barossa Regional Profile YE Dec 2024).

Considering the available evidence, the proponent's failure to reconcile the 2023 Hotellerie analysis with the latest SATC data on visitation, occupancy and regional performance renders its demand case incomplete and unreliable. In circumstances where existing constraints in Barossa tourism relate primarily to product diversity, positioning and length of stay rather than a demonstrable shortfall in room stock, there is no objective basis to regard a six-storey resort on protected rural land as a proportionate or necessary response. This disconnect between the evidence base and the scale, form and location of the proposal weighs strongly against approval of the development.

The EIS and Appendix 3 both lean heavily on the Hotellerie 2023 scoping study and a product gap argument, but the proponent's claim does not clearly demonstrate that SBWTAP will open genuinely new segments beyond those already being catered for by existing and committed projects and are untested and implausible in the light of the publicly available data.

The Economic Impact Report states that the hotel will '*diversify the region's visitor mix*' (Appendix 3, p 18, section 3.2.3 Operational Phase Impact) and target leisure travellers, conference attendees, and special event groups, and that an internationally branded hotel will help '*attract new visitor segments*' and strengthen the business events market.

However, the Barossa already has an internationally branded 4.5-star resort in the Novotel Barossa Valley, offering 140 rooms, a full service spa, extensive conference facilities, and resort amenities under a globally recognised Accor brand (#7 globally and #1 in Europe), which already serves many of the same high yield leisure and business events segments the SBWTAP claims to attract newly.

The same report also acknowledges that current average occupancy for Barossa is 60% across 1,311 rooms and that only around 20% of domestic nights in the Barossa are in hotels/resorts/motels, with a very high share in caravan parks, camping and friends/relatives, indicating that the primary constraint is not the absolute number of traditional hotel rooms but how the region is positioned and the type of experiences on offer. (Appendix 3, p 11, section 2.2.1.4 Tourism Growth and Accommodation Shortage, Barossa Regional Profile, p 4, Rooms in the Barossa and p 5, Visitor Use of Accommodation).

In parallel, the region is already seeing a pipeline of high end, experience rich accommodation and conference product that directly overlaps with the SBWTAP offer: the refurbished 4.5 star Novotel Barossa Valley Resort with 140 rooms, the luxury

Endota day spa, extensive conference facilities and direct access to Tanunda Pines Golf Course and proximity to Jacob's Creek world renowned visitor centre; the Nexus Barossa and Oscar Seppeltsfield hotel projects (together adding 200 luxury rooms, both with spas and event spaces); the award winning Seppeltsfield estate, already caters for a broad range of conferences and premium events.

In this context, the proponent's claim that SBWTAP is needed to '*attract new market segments*' appears largely untested: the EIS does not provide transparent evidence that the region's emerging supply of luxury and conference capable accommodation (including the Novotel, existing, Nexus, under construction (EIS p 27 Section 5.3.6 Regional International Identity), Oscar, construction due to start December 2025), will be insufficient to meet realistic demand scenarios, nor does it show that SBWTAP would target materially different markets rather than competing within the same high yield segments.

Given the scale of the proposal and the approved pipeline of new rooms, the proponent's failure to provide updated, capacity-constrained demand modelling that incorporates Nexus Barossa, Oscar Seppeltsfield and the existing Novotel means it has not identified any distinct incremental visitor segments that cannot reasonably be accommodated in existing or already approved stock. In the absence of clear evidence that unmet demand cannot be satisfied through this capacity or through future large-scale accommodation in appropriate township locations, there is no strategic or economic justification for a new six-storey resort on high bushfire risk protected rural land, and this disconnect between demonstrated need and proposed supply is a material consideration against approval.

The proponent's justification for SBWTAP relies on an audit gap report from 2011 and regional visitor strategies published before recent major developments. The South Australian Regional Visitor Strategy 2020 published in 2018 and the revised 2025 version published in 2022, both reuse key content e.g. '*development of '4-5 star accommodation product of scale that could meet unmet demand during major events and for conferences*', but since their release, the Nexus Barossa hotel has been approved and is under construction (EIS, p 27, section 5.3.6 Regional and International Identity), with Oscar Seppeltsfield also set to commence construction in December 2025. These new projects are directly filling the previously identified 'gaps' in Barossa premium accommodation supply, rendering much of the cited strategic context out of date and overstated, as argued in the EIS and its appendices. Continuing to reference these old documents fails to acknowledge this substantial new room supply and changing demand landscape, meaning the market gap no longer exists as previously described.

'It is acknowledged that a number of other accommodation projects have been proposed/approved in the Barossa... Should even 1 or 2 of these other projects

eventually come to fruition, there will remain ample demand for accommodation in the region to satisfy the occupation rates required to sustain these hotels.' (EIS, p 15, section 4.3.2 Project Rationale). However, the proponent provides no market data, modelling, or supporting evidence to justify this assertion; making such claims without rigorous analysis risks a dangerous oversupply that could dilute Barossa's premium reputation and undermine the long-term sustainability of the region's hospitality sector.

Given the scale of the proposal and the imminent addition of Nexus Barossa, Oscar Seppeltsfield, and the existing Novotel, the proponent's failure to provide a transparent, capacity-aware demand analysis means it has not demonstrated that any materially underserved market segments remain that would warrant a further large resort in a rural area. In the absence of clear, current evidence that such demand cannot be met within existing townships or tourism development zones, approval of another out-of-town six-storey resort on high bushfire risk protected rural land risks oversupply, dilution of Barossa's premium brand and avoidable pressure on the long-term viability of existing hospitality and tourism businesses, and on this basis the proposal should not be supported.

Missing Winery and Vineyard Operator

'The project was conceived in late 2022 after an approach was made to Strategic Alliance by an established Barossa wine label to assist with its expansion and growth.' (EIS p 13 section 4.3.1).

'The Winery and vineyards are to be operated by a separate undisclosed entity.' (EIS p 13 Section 4.2)

We understand that the proponent approached at least one established Barossa winery in 2023 regarding becoming the SBWTAP winery entity. However, the winery owner did not proceed due to the lease term offered, underscoring the need for the proponent to identify the winery operator and whether a genuine commitment exists.

The EIS does not clearly explain why a new winery and cellar door must be established at the SBWTAP site rather than through expansion or enhancement of existing winery facilities or by purchasing one of the several 500-ton winery facilities that were on the market in the Barossa in 2022. In this context, the winery component appears secondary to the hotel, raising questions about whether it is being appended to lend the proposal additional planning credibility and whether it will, in practice, ever be delivered within the stated timeframe.

The EIS also states, *'operational independence maintained between the Winery and the Hotel'* (EIS p 33, Section 6.2.2), implying that the winery's growth is not contingent on the hotel's construction and operation. This separation suggests the winery cannot

reasonably serve as a core justification for the hotel, and the proponent should clarify why a large resort on this site is needed to support the winery, rather than pursuing winery expansion at the existing site or in a more appropriate location.

Also, what happens if the winery fails commercially, which is a possibility given the current climate in the Australian wine industry?

'winery operator, details of whom will be advised at a later date.' (EIS p 37 section 6.3).

If there is a Barossa winery partner for this project, why is its identity not disclosed? Particularly when the hotel operator (IHG) is prominently named and promoted throughout the EIS. This lack of transparency around the winery entity raises reasonable questions about the status and certainty of the winery component, and the proponent should have clarified who the winery operator is and what commitment, if any, had been secured.

'The project will be delivered in two key stages: Stage 1 will involve the construction of the tourist accommodation facility and key site infrastructure. Stage 2 will deliver the winery, cellar door, and associated components... Stage 1 is anticipated to take approximately 24 months, with Stage 2 commencing roughly 12 months into the program.' (EIS p 37 Section 6.3).

'A staged construction and activation approach is anticipated... subject to final design and market demands' (EIS p 39 section 6.4.1).

Experience in South Australia shows a recurring pattern. Once approvals are granted and the most profitable elements are underway, other promised components are often reduced, delayed, or not delivered as initially described. Examples include commitments to return parts of the old Royal Adelaide Hospital site to Park Lands that were not realised, assurances that the Football Park oval would remain community open space that have since been wound back, and parkland *'returns'* associated with the O-Bahn project that were outweighed by new encroachments, as well as Glenside, where an earlier mid-rise, open-space vision has been reshaped to accommodate much taller towers.

In this context and given the explicit staging and market-contingent language around the SBWTAP winery, decision-makers should not rely on unsecured Stage 2 commitments: any consideration of approval should be subject to clear, enforceable conditions that tie the operation of tourist accommodation to the timely delivery and ongoing operation of the winery and associated primary production.

Given these uncertainties and the clear staging risks, the absence of a binding, enforceable staging framework and firm commercial commitments for the winery component means there is no reliable assurance that the integrated winery, cellar door and associated primary production outcomes will ever be delivered. In circumstances

where the proponent has not named the winery operator, disclosed executed agreements or explained how and when Stage 2 would proceed under varying market conditions, the proposal must be treated as a stand-alone resort on protected rural land in a high bushfire risk area, and this uncertainty as to delivery of the winery element is a material consideration against approval.

Greenhouse Gas (GHG) Emissions for Construction, Alternatives Assessment, and Site Selection Justification are Missing

'To ensure the development minimises greenhouse gas emissions associated with its construction and operation. Undertake a greenhouse gas (GHG) assessment that identifies: all sources GHG emissions that would be generated' (Assessment Requirements EIS, p 24 Climate Change and Resource Efficiency, CCRE2).

The GHG Emissions for construction have not been provided. A detailed, evidence-based assessment is required to ensure emissions are minimised and align with South Australia's net-zero targets.

The requirement for a comparative analysis of alternatives to SBWTAP, including the 'do nothing' option, is set out in the SBWTAP Assessment Requirements.

In the Assessment Requirements EIS Southern Barossa Winery and Tourist Accommodation Project, p 16, section 5.6 Project Alternatives, it states:

'Where relevant, feasible alternatives considered for the proposed project should be presented in the EIS described and evaluated the comparative environmental, social, and economic impacts (including the option of not proceeding). Where necessary for the assessment, each alternative and its potential impacts should be discussed in sufficient detail to enable an understanding of the reasons for preferring certain options and courses of action while rejecting others. This may be used to inform a justification of why the proposed project and preferred options should proceed.'

The proponent chose to purchase a rural site in a high-risk bushfire area with no existing infrastructure, within the CPD and SLP overlay. They could instead have bought a safer, more suitable site within a designated tourism development zone.

SBWTAP, in addition to the existing Novotel, Nexus Barossa (under construction) and Oscar (construction due to start in December 2025), risks oversupply of out-of-township luxury resorts in the Barossa, and state planning policy prioritises net-zero, compact development. Infill within townships reduces greenhouse gas (GHG) emissions by utilising existing infrastructure, minimising new roadworks, and supporting walkable, low-carbon communities.

The proponent has voluntarily chosen an unsuitable rural site in a high bushfire risk area and has not provided a defensible strategic, environmental or climate-related justification for this decision. In circumstances where South Australia has adopted clear emissions reduction and net-zero targets, the proponent has failed to quantify and compare the greenhouse gas profile of SBWTAP as a car-dependent rural build against a township-based alternative. The proposal is inconsistent with responsible regional planning and with contemporary expectations for climate policy. Given the well-established advantages of township locations – including existing infrastructure, lower per-visitor emissions, reduced environmental impact and broader economic and social benefits – the absence of a clear, evidence-based rationale for favouring this rural site further undermines the proposal and weighs strongly against approval.

Inadequate Baseline Environmental Characterisation

The EIS and appendices demonstrate systemic deficiencies in baseline study methodologies, failing to adequately characterise existing site conditions as required by the EIS Assessment Requirements (April 2025).

Specific deficiencies include:

1. Flora/Fauna (Appendix 12B): a single-day field survey (19 November 2024) was inadequate to detect 31 threatened fauna and 35 threatened flora species potentially present. No seasonal replication, no targeted threatened species surveys, and acknowledged inability to detect orchid species due to survey timing.
2. Air Quality (Appendix 8): No baseline odour or ambient air quality measurements. Entirely predictive assessment despite the WWTP being identified as a '*High Risk*' odour source within 300m of sensitive receivers.
3. Surface/Groundwater: No baseline water quality sampling, flow monitoring, or groundwater bore establishment despite Assessment Requirement PE3 mandating characterisation of 'seasonal variations' and 'existing monitoring information'.
4. Light: No baseline field survey or measurement of existing night-time darkness, skyglow, or light spill was undertaken. Assessment is limited to desktop simulation based on draft landscape plans and presumed compliance with Australian Standards, with all impact predictions deferred until after final lighting design and installation. There is no empirical data on pre-development light levels, no survey of light-sensitive locations, and no commitment to post-installation photometric monitoring or operational audits. Wildlife and rural

amenity protections rely on generic mitigation principles rather than specific, measurable, or enforceable controls.

Assessment Requirements (Table 2) specify that even 'STANDARD' assessments must be '*supported by quantitative assessment methods*'. The submitted appendices rely predominantly on desktop reviews, single-site visits, and predictive modelling without establishing baseline conditions against which impacts can be measured.

This represents a fundamental failure to establish the '*existing environment*' baseline required under Section 5.5 of the Assessment Requirements, which mandates '*description of the existing environment, including the immediate and broader location, identifying sensitive receptors*'.

Without robust baseline data, the EIS has not demonstrated compliance with impact thresholds, calibrated predictive models, or provided a measurable reference for ongoing monitoring or adaptive management.

Given the extent and nature of the information gaps in the EIS, the proponent has failed to undertake the comprehensive, multi-season baseline field studies required for all relevant environmental attributes (including flora, fauna, air, water, and visual/lighting) and expected under contemporary assessment requirements and technical guidance. In the absence of repeated seasonal and diurnal surveys, systematic monitoring, and targeted threatened-species work using best-practice methods, there is no reliable baseline against which to predict impacts, set thresholds, or design effective mitigation and adaptive management. The EIS is therefore fundamentally deficient.

Because methodologies are not documented in sufficient detail, the sampling design and its limitations are not transparently explained, and key data gaps remain unaddressed, the environmental assessment does not meet legal or best-practice expectations for an impact-assessed development of this scale. These baseline deficiencies are so significant that they justify treating the EIS as not fit for purpose and constitute an independent and sufficient basis for refusing the development rather than allowing it to proceed on the current, inadequate evidentiary foundation.

Bushfire Wrong Site

The proposed site (bordering Hoffnungsthal and Menzel Roads in Barossa) is incorrectly described; '*The topography surrounding the property is described as flat and slightly undulating in places, with average slopes less than three (3) degrees (refer to Figure 15).*' (Appendix 17, p 31, section 9.4 Topography).

This is a property near Naracoorte, not in Barossa (Appendix 17, p 34, Figure 15 - Shape and Aspect).

The actual proposed site *'is characterised by rolling slopes... The Hotel site... with an average slope of approximately 14.5%; The Winery site...averaging 9% slope, with some areas reaching up to 15%.'* (EIS, p 121, section 10.7.2.1 Site Topography). Steeper slopes can increase bushfire risk. *'Possible increased fire behaviour from the interaction of the varying slopes and grassland fuel, which are easily affected by wind changes'* (Appendix 17, p 28, section 9.1 Site Factors).

Because the bushfire assessment appears to rely on an incorrect characterisation of the site as *'flat to slightly undulating'*, apparently drawn from a different Naracoorte property rather than SBWTAP's documented slopes of around 14–15%, its conclusions about fire behaviour, exposure and risk management are inherently unreliable. In circumstances where slope is a critical determinant of bushfire intensity, spread and radiant heat exposure, the use of inaccurate topographic inputs invalidates the Bushfire Risk Assessment, the Bushfire Emergency Management Plan, and the development cannot be treated as acceptable on this basis.

Given the site's steeper slopes and high bushfire risk context, the proponent's failure to recalibrate the assessment using correct topography and to test whether more conservative operational measures, including full closure on Catastrophic and all Extreme fire danger days (for example, where the Fire Behaviour Index exceeds 49), are required, represents a serious safety and due-diligence deficiency. This reliance on flawed terrain assumptions and the absence of a precautionary, evidence-based operating regime together count significantly against approval.

Bushfire

Recent Bushfire Incidents Near the Site

Bushfire risk has increased with climate change, and there is *'increasing bushfire risk throughout Australia'* (Appendix 17, p 7, section 1 Executive Summary).

There have been multiple fires in the past 50 years near the proposed site, including along Tweedies Gully and Menzel Roads. There have been several recent fires within a 2 km radius of the site requiring multiple Country Fire Service (CFS) appliances and water bombers: Menzel Road (2023), Sugar Loaf Road (two separate fires in 2023), Barossa Helicopters (2018), and St Jakobi (2018).

Given the documented local fire history, the site's high bushfire risk context and its immediate exposure to flammable vegetation, there is no credible strategic or safety-based justification for locating a six-storey hotel and winery in this rural setting rather than in a less exposed township. In the absence of a rigorous, evidence-based explanation as to why a project of this scale cannot be directed to a lower-risk, better-

serviced township location consistent with contemporary bushfire-aware planning practice, the choice of site is unreasonable. This unjustified exposure of guests, staff, community and emergency responders to elevated bushfire risk is a material consideration against approval.

Very High Risk from Human Activity, Steep Terrain Amplifies Danger, Barossa Range

The SBWTAP has a '*Very High-Risk Rating*' Appendix 17, p 44, section 10.4 Qualitative Bushfire Risk Assessment)

Currently, the site has no buildings and is used only by vineyard workers. If the SBWTAP proceeds, there could be more than 1,000 visitors and staff on site (EIS Assessment Requirements, p 3, section 2 Description of Development).

The risk assessment is clear: '*increased human activity often has the most potential to increase ignition likelihood*' (Appendix 17, p 28, section 9.1 Site Factors). It also notes that '*increasing volume of human activity and vehicles accessing the area... [and] construction incidents further heighten bushfire risk*' (Appendix 17, p 28, section 9.1 Site Factors). The documentation explicitly recognises human activity as both an ignition source and a risk multiplier, confirming that more people on site will directly elevate bushfire risk.

The EIS confirms that the hotel site is located on steep terrain averaging approximately 14.5% slope, while the winery site averages 9% with some areas up to 15% (EIS, p 121, section 10.7.2.1 Site Topography). Critically, the bushfire risk assessment explicitly states: '*fire will burn faster uphill, especially when pushed by prevailing winds*' (Appendix 17, p 31, section 9.4 Topography). These steep slopes at the proposed development directly increase the rate and severity of bushfire spread.

Located on steep, sloping terrain in the foothills of the Barossa Range, any fire starting at the site would rapidly run uphill into the range, where rugged topography, limited access and challenging escape routes make active firefighting and asset protection extremely difficult and dangerous. Once established in the range, such a fire would be very hard to contain. It could cause widespread devastation across Barossa, posing an unacceptable threat to life, property, and regional values.

Bringing a six-storey, 1,000+ person resort into a location already assessed as Very High bushfire risk, on steep slopes that accelerate fire behaviour, is fundamentally at odds with contemporary bushfire-aware planning, which seeks to reduce, not intensify, exposure of people and assets in such environments. The combination of increased ignition likelihood from human activity, topography that drives fast upslope runs into the

Barossa Range, and limited evacuation capacity means this site cannot reasonably be regarded as suitable for a major accommodation use.

Where credible lower-risk township locations exist for large hotels, proceeding with SBWTAP on this exposed hillside would represent a conscious choice to elevate risk to guests, staff, neighbours and emergency responders beyond what is ethically or strategically defensible. These factors, taken together with the errors and omissions in the bushfire assessment, provide compelling grounds to find the development unacceptable on bushfire safety alone.

The development also increases direct bushfire risk to neighbouring properties, which would be exposed to additional ignition sources, embers, smoke and traffic congestion from evacuating guests and staff.

The unacceptably high risk that the SBWTAP poses to Barossa weighs heavily against approval.

Ignored Expert Safety Warnings

The proposed Bushfire Emergency Management Plan (BEMP) July 2025, prepared by SA Bushfire Solutions, recommends site closure on Catastrophic and Extreme days greater than 74 Fire Behaviour Index (FBI), (Appendix 17, p 67, section 7, Recommended Actions on forecast Fire Danger Ratings, Table 5 - Actions for Forecast Fire Danger Ratings, p 12, Southern Barossa Winery & Tourist Accommodation Project, Bushfire Emergency Management Plan).

Yet the proponent states, *'The site will be closed on declared Catastrophic Fire Danger Days.'* (EIS, p 103, section 10.5.2.5 Design Considerations and Mitigation Measures)

Lack of closure on the recommended extreme days would prioritise profit over the safety of the community, staff, and tourists.

The proponent's failure to adopt SA Bushfire Solutions' recommendation for closure on both Catastrophic and Extreme (FBI greater than 74) days creates an unjustified inconsistency between the independent expert advice and the proposed operating regime. In circumstances where any relaxation of this precautionary standard would expose guests, staff, and the surrounding community to a higher residual risk, the absence of robust, independent evidence supporting a lower closure threshold is unacceptable. This failure to apply or transparently justify a divergence from conservative, expert-endorsed operating standard further undermines the proposal and weighs strongly against approval.

Unsafe Single Escape Route

There could be more than 1,000 guests and staff on the SBWTAP site (EIS Assessment, p 3, section 2 Description of Development), with only one escape route to evacuate them, along with existing residents, in an emergency. The Hoffnungsthal and Lindner Road intersection on this escape route is so narrow that a CFS appliance and a car cannot pass simultaneously, and it cannot be significantly improved.

This situation presents an unacceptable and unsafe risk to the local community and tourists.

'A review of vehicle turn paths within the curved section of Hoffnungsthal Road indicates that simultaneous movements of a commercial vehicle (such as a Heavy Rigid Vehicle) and a car (B99 design vehicle) could not be accommodated within the existing carriageway width in the vicinity of the Lindner Road intersection. ... The increase in volumes associated with the proposal including increased commercial vehicle movements would, however, increase the probability of conflict. Desirably, widening would be undertaken... The ability to undertake significant improvement is limited by large significant and/or regulated trees for which removal would unlikely be approved' (Appendix 10, p 27, section 6.2.2 Detailed Review).

When more than 1,000 guests and staff are added to the existing rural population, all dependent on a single escape route that cannot safely accommodate simultaneous passage of standard vehicles and CFS appliances, the evacuation risk ceases to be a tolerable design challenge and becomes an inherent, unmanageable constraint. No amount of signage, traffic management or operational fine-tuning can change the geometry of the Hoffnungsthal–Lindner intersection or the regulatory obstacles to widening it.

In a worst-case bushfire scenario, emergency vehicles would be forced to share this constrained corridor with panicked evacuees, significantly increasing the likelihood of blockage, collision, or operational delay at precisely the time when seconds matter most. This is an unacceptable planning outcome that exposes both visitors and residents to avoidable danger and strongly supports refusal of a development of this scale on such a constrained rural road network.

The EIS does not provide a credible explanation of how the unacceptable evacuation and traffic risks to both guests and the local community would be managed in a major bushfire event. In circumstances where more than 1,000 people may need to evacuate along a constrained route that must also accommodate CFS operations, and where the geometric limitations at the Hoffnungsthal and Lindner Road intersection are already acknowledged, the absence of a detailed, scenario-tested emergency evacuation and traffic management assessment is a critical deficiency that weighs heavily against approval of the development.

Safer Alternatives Overlooked

With the increasing risk of bushfire, it is essential to note that *'Australia and the state of South Australia are among the most fire-prone areas in the world.'* (Appendix 17, p 18, section 7.1 Bushfires in Australia). Siting such a large hotel in a high-risk bushfire area, despite the availability of significantly safer options, presents an unacceptable risk to the community.

Tanunda is listed as one of the Closest Bushfire Safer Places for SBWTAP evacuees (Appendix 17, p 50, section 12.2 Closer Bushfire Safer Place), and it already has a Tourism Development Zone for large-scale tourist accommodation projects. Building major accommodation at established township sites, where multiple evacuation routes and proven bushfire safety infrastructure are in place, would offer much greater protection for visitors and locals. Prioritising township locations rather than expanding risky development into vulnerable rural zones aligns with current policy and the intentions of the Tourism Development Code Amendment, which encourages safer clustering of large-scale tourism projects.

The site is located in a high bushfire risk area, and safer township-based options are available within designated Tourism Development Zones. There is no persuasive justification for concentrating a six-storey hotel and winery in this exposed rural location.

In the absence of a clear comparative bushfire risk assessment showing that life safety for guests, staff and the surrounding community would be satisfactorily protected at SBWTAP compared with a township location, the choice of this high-risk rural site is unreasonable and weighs strongly against approval.

Local Firefighting Capacity Not Assessed

There is no explicit analysis in the EIS of whether local or regional fire appliances, most of which are designed for rural fires and typical low-rise development, can access or effectively fight a fire in a six-storey building. This is critical for the safety of guests, staff, and emergency responders, given the hotel's unusual height for the region.

The EIS fails to address the structural fire implications of placing a six-storey building in a rural CFS area where high-rise firefighting appliances are unlikely to be available, exposing future guests and the broader community to avoidable risk. This omission is a serious oversight, and in the absence of a detailed assessment prepared in consultation with the CFS – demonstrating that suitable appliances, reliable water supplies, access

arrangements and operational protocols will be in place to protect guests, staff and emergency responders during a significant structural fire – the proposal cannot be regarded as providing an acceptable level of fire safety and this weighs strongly against approval of the development.

Land tenure, protected areas and land use

Character Preservation Act (CPA), Significant Landscape Protection (SLP) Overlay and the Planning and Design Code

SBWTAP is located in the foothills of the Barossa Range, part of the Mount Lofty Ranges. The Adelaide Hills Face Zone is protected through strict planning controls that preserve the natural character and environmental values of the western face of the Mount Lofty Ranges. The protections extend along about 90 km from Gawler in the north to Sellicks Hill in the south, forming a visible green backdrop to metropolitan Adelaide. The same protection should apply in Barossa.

The Planning and Design Code clearly contemplates that any tourist accommodation, the scale of SBWTAP, should occur within appropriately zoned townships or locations specifically identified for such uses, not as isolated, urban-scale enclaves within the Rural Zone and SLP overlay.

The nominal, and as yet unnamed, ‘winery’ component appears to operate primarily as a thematic device rather than a genuine, viable primary production enterprise, meaning the dominant land use is, in substance, large-scale tourism and entertainment, contrary to the Code’s policy that value-adding tourist activities remain subordinate to, and demonstrably integrated with, bona fide rural production.

The proposal is fundamentally inconsistent with the objects of the Character Preservation (Barossa Valley) Act 2012 and the Character Preservation District (CPD) provisions, which require that primary production, natural and rural landscapes, and the special character of the Barossa remain the dominant and defining land uses.

A standalone, hill-face resort accommodating around 1,000 people functions as a de facto township in a location deliberately retained in primary production and Significant Landscape Protection. It therefore cannot reasonably be characterised as an ancillary tourism use compatible with the intent of the CPA and CPD.

The proposed hotel is within both the CPD and SLP overlay, designed to preserve rural land and protect Barossa's unique scenery. These overlays are not challenges to be overcome, as the developer contends: *‘The project’s design responds to the challenges posed by overlays such as Character Preservation, significant landscape protection...’* (Appendix 7, p 30, section 3.10 Tourism Development Code Amendment). This position

is at odds with the community's view of these safeguards as vital protections rather than mere hurdles.

These are not abstract planning concepts or personal preferences; they are statutory safeguards upheld by the Supreme Court of South Australia in *Geber Super Pty Ltd v The Barossa Assessment Panel* [2023] SASC 154, which confirmed that a resort of this nature must not be approved in the Rural Zone.

The developer also claims to be '*transforming currently vacant land into a visually engaging and curated environment*' (Appendix 22, p 31, section 4.2 Social Impact Matrix), misrepresenting the site's long history as productive vineyard and agricultural land, home to 50-year-old Shiraz vines until their recent removal from the proposed hotel site.

Barossa's tourism thrives because of its wine and rural landscape, not despite them; undermining these values directly contravenes the intent of the overlays and the region's long-term interests.

The EIS does not provide a clear or systematic explanation of how SBWTAP complies with the CPA, SLP overlay, Character Preservation District provisions or the Planning and Design Code's clear expectation that large-scale tourist accommodation be located within appropriately zoned townships or specifically identified tourism development zones, rather than as an isolated, urban-scale enclave in the Rural Zone. Nor does it justify a six-storey, de facto township of around 1,000 people, where the nominal '*winery*' operates largely as a thematic device and the dominant land use is large-scale tourism and entertainment, contrary to policy requiring value-adding tourist activities to remain subordinate to bona fide primary production and the preservation of rural and landscape character. In the absence of a rigorous, policy-by-policy justification showing that the proposal is genuinely compatible with the conservation, character and land-use objectives of the CPA, SLP overlay, Character Preservation (Barossa Valley) Act 2012 and the Planning and Design Code, the development should be regarded as fundamentally inconsistent with the applicable planning framework and be refused.

Protecting Barossa and South Australia's World Heritage Future

'The broader Mount Lofty Ranges region is currently under nomination for UNESCO World Heritage listing. The original bid has since been revised to target smaller zones that already possess heritage or character overlays.' (EIS p157, section 10.9.3.2).

The proposed SBWTAP is in the CPD and the SLP overlay, and it places the Barossa region's current World Heritage nomination at significant risk.

The potential loss of World Heritage eligibility would deprive Barossa and greater South Australia of profound and enduring cultural, economic, and reputational benefits. The broad, long-term advantages of UNESCO inscription demonstrably outweigh any short-term, narrowly distributed financial gains from SBWTAP construction and operations.

International precedent demonstrates that inappropriate large-scale development places recognised landscapes at risk of failing the UNESCO assessment, or of losing their existing designation. UNESCO stripped Liverpool of World Heritage status in 2021 after the approval of major new developments found to compromise the authenticity and integrity of the site's heritage values. The Liverpool case underscores the risks faced by South Australia, including Barossa, where significant new construction undermines nominated attributes.

Economic analysis consistently shows that World Heritage inscription brings significant, sustained increases in regional tourism, international visitation, employment, and global profile. By contrast, the hotel proposal indicates a one-off construction-phase benefit, limited ongoing hospitality employment, and modest annual revenues relative to the collective uplift delivered by heritage inscription.

World Heritage status would benefit present and future generations by safeguarding Barossa's unique landscape and cultural values, maximising economic opportunities from sustainable visitation, and upholding South Australia's reputation for cultural and natural heritage stewardship. Approval of SBWTAP may irreparably compromise both nomination integrity and future listing prospects, resulting in a net loss to the region and state compared with the strategic benefits of UNESCO recognition.

The EIS fails to present a substantive or transparent analysis demonstrating that the proposed development will not pose a risk to Barossa's World Heritage nomination, specifically in relation to the region's distinctive rural landscape character.

The EIS relies on general statements regarding compatibility with local character (EIS p157 Section 10.9.3.2) yet does not specify mitigation measures or rigorous protections to ensure that the landscape qualities and heritage attributes, central to both the Barossa's significance and its World Heritage case, are preserved. Given the scale, height and visibility of the proposed hotel in an open rural valley context, there are substantial grounds to conclude that it would erode the very rural landscape character that underpins the Barossa's World Heritage value case.

The EIS does not reference UNESCO management protocols, risk frameworks, or lessons from precedent cases where rural landscape integrity was decisive for heritage outcomes. Nor does it contain any independent expert analysis demonstrating that SBWTAP will not compromise the integrity, authenticity, or landscape values that underpin the Barossa and Mount Lofty Ranges World Heritage nomination.

In the absence of such evidence, the presumption must be that a large, visually prominent tourism complex within a sensitive agrarian landscape is more likely to diminish than reinforce the integrity and authenticity required for World Heritage listing.

To address this, the proponent would need to commission a rigorous assessment aligned with UNESCO criteria, demonstrate clear consistency with the Character Preservation and Significant Landscape Protection overlays, and identify specific mitigation measures to safeguard the region's agrarian and cultural landscape setting.

In addition, there is no evidence of careful engagement with international precedent or of a robust management framework to ensure that the project's scale, visibility and operational profile do not erode the attributes on which current and future World Heritage eligibility depends.

On the available material, there are therefore reasonable and defensible planning grounds to expect that the project, if approved in its current form, would place the Barossa and Mount Lofty Ranges World Heritage bid at measurable risk. This failure to demonstrate that the development can coexist with, rather than incrementally undermine, the emerging World Heritage bid is a substantial strategic planning concern that weighs strongly against approval of the proposal.

Benchmarking Against World-Class Wine Regions

The following are examples of the InterContinental Hotel Group's properties in globally renowned, premium wine regions:

1. Bordeaux in Bordeaux
2. Burgundy in Beaune
3. Central Otago in Queenstown
4. Champagne in Reims
5. Lavaux in Geneva
6. Mornington Peninsula in Sorrento
7. Napa in Napa
8. Piedmont in Turin
9. Porto in Porto
10. Prosecco Hills in Venice
11. Rioja in Logroño
12. Upper Middle Rhine Valley in Wiesbaden
13. Veneto in Verona
14. Wachau in Vienna

They are all in towns; none are in vineyards.

It is typical in acclaimed wine regions for large hotels to be located within townships, anchored in their communities rather than isolated among rural vines. Barossa should be no different.

Building large-scale resorts in townships preserves agricultural landscapes, reduces the risk of introducing disease into vineyards, maintains scenic value, and ensures tourists can integrate with local businesses and culture. World-class destinations do not sacrifice the very landscapes that underpin their global reputation, and Barossa deserves no less.

The EIS does not explain why a site subject to Character Preservation and Significant Landscape Protection overlays has been chosen for a development of this scale instead of a location within an identified tourism development zone, as contemplated by the Tourism Development Code Amendment. In the absence of a transparent alternatives assessment that evaluates suitable township and tourism-zoned options and provides a clear, evidence-based rationale for preferring this constrained rural site, the strategic site selection case is incomplete. It weighs strongly against approval of the proposal.

Unacceptably High Phylloxera Risk

The Barossa, on average, accounts for 27% of the total value of the South Australia grape and wine sector, contributing over \$740 million annually (Regional Development Australia, Barossa Gawler Light Adelaide Plains, Industry Profile – Wine).

The Barossa's 14,277 hectares of vineyards produce on average 65,000 tonnes of grapes annually (2000-25) worth \$114 million in 2025 (2025 South Australia Winegrape Crush Survey).

2,700 people are employed in the wine and grape sector in the Barossa, accounting for 9% of national wine sector employees. (Regional Development Australia, Barossa Gawler Light Adelaide Plains, Industry Profile – Wine).

Since 2001, exports of Barossa wine have grown from 402,000 cases to 1.2 million cases annually (Year ending September 2025), and in dollar terms from \$39 million to \$167 million (Year ending September 2025), and continue to grow (Wine Australia Export Dashboard).

Introducing a large, high-turnover hotel resort and winery, with potentially up to 1,000 guests and staff (Assessment Requirements EIS, p 3, section 2 Description of Development), in the middle of productive vineyards greatly increases biosecurity risks in a phylloxera-free region, with any outbreak potentially devastating Barossa's vineyards and long-term brand value.

The proponent proposes standard vineyard hygiene measures (fencing, controlled access, signage, sanitation protocols and staff training) (EIS, p 81, section 10.2.1.2 Mitigation Measures), which are appropriate for a working vineyard but do not alter the fact that placing a large, high turnover international hotel and events facility, in the middle of productive vines materially increases the number of potential pathways for pests and diseases into one of the world's oldest phylloxera free wine regions, potentially exposing the Barossa's wine economy and brand to an extreme consequence biosecurity failure.

Unlike vineyard staff, who are trained, understand the risks and have a direct stake in protecting vine health, hotel guests cannot realistically be expected to undertake biosecurity training or consistently comply with strict hygiene protocols, and a proportion will disregard signs and restrictions. In practice, this makes failure of vineyard-level biosecurity procedures more likely, as a direct and foreseeable result of siting a resort so close to vines. It stands in sharp contrast to other leading wine regions, where high-end accommodation is typically set back from vineyards. In this context, the problem is not just that the EIS has failed to demonstrate a low residual risk; it is that, on any common-sense view, the configuration of this proposal points towards an unacceptably high phylloxera risk that has not been credibly addressed.

The EIS does not demonstrate that the additional phylloxera risk created by SBWTAP's specific tourism and functions focus, and rural location can be reduced to an acceptable or genuinely negligible level. In circumstances where Barossa's vine heritage depends on maintaining a very high standard of biosecurity, the absence of detailed, independent expert analysis of SBWTAP-specific pathways, risk ratings and treatments is a significant deficiency. It weighs strongly against approval of the proposal.

Precedent and Planning Pathway Concerns

If approved by the Minister, this project risks setting a powerful precedent for large-scale tourism infrastructure on protected rural land throughout the CPD and SLP overlay.

Approving this proposal would create a direct conflict with the Greater Adelaide Regional Plan's direction to protect the Barossa and its rural hinterland from urban and township encroachment, and to focus higher-order tourism and accommodation growth in existing settlements and designated nodes. It would also set a damaging precedent for further '*resort first, token production later*' proposals in the CPD, undermining both the statutory purpose of the CPA and long-standing community and

government expectations about how growth will be managed in the Barossa landscape. A Ministerial-level approval of such a conspicuous resort would signal that CPD and SLP overlay controls can be overridden for speculative tourism projects, potentially inviting similar proposals across the district and State. This would incrementally erode the very qualities that underpinned the creation of these protections and the region's reputation as a carefully managed wine landscape, adversely affecting the prospects of a successful World Heritage listing application.

The concern extends to Barossa's entire rural fabric and to the integrity of its planning system. Once one major resort is permitted on protected land, it becomes difficult to argue against subsequent applications seeking comparable treatment, regardless of cumulative visual, environmental, and social impacts. The safer and more consistent course is to uphold the intent of the CPA and associated overlays by directing large-scale developments to zoned locations, as courts and policy frameworks already anticipate.

The EIS does not establish that SBWTAP delivers an exceptional public benefit of a kind that could justify setting a de facto statewide precedent for large-scale tourism resorts on protected rural land, despite foreseeable adverse implications for the World Heritage bid and similarly protected landscapes elsewhere in South Australia. It fails to demonstrate how approving this proposal would remain consistent with the Greater Adelaide Regional Plan's direction to protect the Barossa and its rural hinterland from urban and township encroachment, or with the statutory and policy intent of the Character Preservation District and CPA overlay.

A compelling justification for overriding longstanding character protection policies, including explicit analysis of cumulative impacts, strategic consistency, and the availability of alternative locations that would avoid undermining established protections, has not been provided. Without such robust justification, the proposal stands as strategically unsound, risking the incremental erosion of the Barossa's protected landscape through precedent-setting Ministerial approval.

Loss of Local Scrutiny

The decision to process SBWTAP as an impact-assessed development under a State-led pathway has also weakened an important layer of local scrutiny that traditionally safeguards the Barossa's character. Local government has longstanding knowledge of landscape values, land use conflicts and community expectations, and the removal of council as the primary assessment authority for a proposal of this scale is inconsistent with the spirit of the Character Preservation Act and the CPD framework.

The impact-assessed pathway was intended for genuinely state-significant projects that deliver unique public benefits, not for generic resort concepts whose demand case is unproven and whose impacts fall most heavily on a protected rural community. If a

development so clearly at odds with the CPA, CPD and SLP overlay can proceed by elevating it above local assessment, the durability of those protections is undermined, and a clear signal is sent that similar large-scale proposals could be advanced in other character areas through procedural circumvention rather than policy change.

Respecting the intent of the CPA and associated Code provisions requires that rural Barossa land not be treated as a blank canvas for urban-scale tourism experiments but as a landscape of high heritage, agricultural and scenic importance where large, dominant built form is fundamentally out of place. Approval of SBWTAP would therefore not only create a damaging precedent in substance but also erode confidence that the State will apply character protections robustly and consistently over time.

Planning Neutrality and Public Promotion

Public confidence in the planning system depends on a clear separation between ministerial or agency promotion of proposals and the impartial, evidence-based assessment that must occur under the Planning, Development and Infrastructure Act. In the case of SBWTAP, multiple public statements by senior figures have described the proposal as an exciting, globally connected development for the Barossa before the EIS was released or tested against policy, creating a perception that the project is being socially positioned as desirable in advance of statutory assessment.

When a development within the CPD and SLP overlay is repeatedly framed as a welcome addition to the region, community members can reasonably question whether their submissions and the technical evidence will be weighed on an even footing with early political enthusiasm. It is therefore essential that the State Planning Commission explicitly reaffirm planning neutrality in its handling of SBWTAP and make clear that the decision will rest solely on the Character Preservation Act, the Planning and Design Code and the merits of the EIS and submissions, not on prior promotional narratives.

Not Anti-Growth, but Pro Location

The issue is not whether Barossa should grow or attract tourism, but where and how that growth occurs.

Well-planned, appropriately located projects can provide jobs, stimulate the local economy, and enhance visitor experiences, particularly when sited within townships or appropriately zoned areas already identified for tourism infrastructure. Developments of this scale in locations such as land around the Novotel Barossa Valley Resort and Château Tanunda, or within town boundaries, can deliver the same jobs and visitation benefits without consuming protected rural landscapes.

Jobs and tourism are not dependent on locating a hotel in the CPD; any comparable development, appropriately located in a township tourism zone, would create similar employment while delivering greater benefits to local businesses. Visitors based in town can walk to cafés, pubs, restaurants, shops, galleries, and events, supporting main street economies rather than being confined to a self-sufficient rural resort. Framing opposition to this specific rural siting as anti-development mischaracterises a position that is, in fact, pro-development in appropriate zones and pro-protection of Barossa's legislated character areas.

The EIS does not demonstrate that a five-star resort of this scale must be located on land within the CPD and SLP overlays rather than in an existing township or zoned tourism area. In the absence of a compelling, evidence-based justification for choosing this high-constraint rural site, it is reasonable to conclude that comparable – and indeed superior – economic and employment outcomes could be achieved in appropriately zoned locations that better support main street businesses and uphold Barossa's character protection framework. The proponent's failure to undertake and present a rigorous site selection and alternatives analysis explaining why the development cannot feasibly be delivered in existing townships or zoned tourism areas is a significant strategic deficiency that weighs strongly against approval of the proposal.

Visual Amenity

Visual Amenity Obtrusive and Not Barossan

The Office for Design and Architecture SA (ODASA) noted that *'further refinements were needed to anchor the hotel within the landscape better and reduce visual dominance'*, along with a *'level of concern regarding building articulation'* (EIS, p 44, section 8.1.5 Office for Design and Architecture SA).

Notably, the EIS itself recommends that *'an interpretive specialist could help shape a more authentic and distinctive sense of place reflective of the Barossa region'* (EIS, p 44, section 8.1.5 Office for Design and Architecture SA), but the design does not deliver this outcome.

Community feedback recorded in the EIS clearly highlights that the *'Development does not blend into the landscape, with a comment suggesting it resembles 'shipping containers'* (EIS, p 45, section 8.2.1 Summary of Early Engagement Feedback). While the SBWTAP claims to *'offer a destination that is unmistakably Barossan'* (EIS, p. 29, section 6.1, Project Philosophy), the ODASA and community feedback highlight that the proposal fails to meet this standard.

The visual form of a six-storey hotel, resembling stacked '*shipping containers*,' is not '*unmistakably Barossan*,' directly contradicting the project's aim to offer a destination uniquely reflective of the region's character. (see Appendix 5a, p 37, Northern Elevation View).

While the proponent asserts that '*in terms of built form, the resort and winery reflect the region's historic and architectural traditions*' and that '*the horizontal architectural language is intended to settle the buildings into the land, offering a respectful response to the rural setting*' (EIS p28 Section 6.1 Project Philosophy), these intentions are not achieved. Stacked rectangles are simply a low-cost way to maximise hotel room space, with the design prioritising profit over being '*unmistakably Barossan*'.

The ODASA and community feedback, as well as the EIS itself, make clear that the design fails to anchor the hotel within the Barossa landscape or reduce its visual dominance.

As Antoni Gaudí stated:

'There are no straight lines or sharp corners in nature. Therefore, buildings must have no straight lines or sharp corners.'

Similarly, Frank Lloyd Wright believed '*organic architecture*' means integrating buildings with their surroundings through harmonious, flowing lines, not the imposition of rectilinear structures.

The stacked, container-like massing of the current proposal falls short of these principles and is inconsistent with the authentic and distinctive Barossa character the EIS claims to celebrate.

The EIS and associated visual material assert that the development 'will not be visible from Lyndoch Valley Road' (EIS, p 76, section 10.1.4. Visual Amenity and Impact), implying that the hotel will be effectively screened from views along the Lyndoch Williamstown Road.

This claim is inconsistent with the project's own architectural drawings, which show the hotel mass rising clearly above the boundary fence line (EIS, p 78, section 10.1.4 Visual Amenity and Impact and Appendix 5a, p 27, section 04 Massing + Spatial Planning, bottom diagram), and with the open sightlines across the site that allow views of moving vehicles on the road, indicating that a building of the proposed height will be visually prominent by day and, when illuminated, conspicuous from a wide area at night.

Taken together, the hotel proposal is not anchored within the landscape, appears visually dominant, lacks sufficient building articulation, and does not represent authentic Barossa character, as evidenced by community feedback and ODASA's

advice. The EIS does not satisfactorily substantiate the proponent's claim that the hotel will sit unobtrusively in the Character Preservation District landscape, given that the built form will be visible from key public roads and elevated vantage points, undermining the contention that its visual impact will be low or recessive.

The EIS does not demonstrate that SBWTAP satisfies the stated assessment criterion ‘to ensure adverse effects on visual amenity, landscape and open space values are avoided or minimised and opportunities to enhance these values are maximised.’ In the absence of a rigorous, policy-aligned justification showing that the hotel’s scale, form and visibility will not unreasonably erode Barossa’s valued rural landscape character, and that any residual impacts have been genuinely minimised, the proposal should be regarded as failing this objective, which weighs strongly against approval of the development.

Design Quality and Precedent

A development of this magnitude must earn its presence in the rural landscape through exceptional, Barossa-responsive design, not merely through compliance with generic built-form controls. The proposed hotel reads as a stacked, rectilinear, modular block, described by community members in the EIS consultation as resembling shipping containers, with little evidence of architectural ambition, craftsmanship or relationship to the valley’s curves, colours and textures.

Recent Barossa projects such as Nexus Barossa demonstrate that large buildings can be contemporary, commercially viable and yet visually recessive and landscape-led. Nexus’s low-profile, earth-integrated architecture softens visual impact and responds to its vineyard setting, whereas the SBWTAP resort imports an urban, box-like massing into one of the most sensitive parts of the CPD and SLP overlay. In this context, the SBWTAP building does not achieve the design excellence or regional specificity that might justify a six-storey structure on protected rural land and therefore fails the implicit 'design quality in exchange for impact' test that should apply in this landscape.

PO 2.2: Visual Subservience Required

The proposal appears to be in tension with the Planning and Design Code's expectation that tourist accommodation in rural and natural settings be clearly subservient to the natural environment (p 588, Planning and Design Code Version 2025.14).

The limited, largely proponent-driven visual assessment, combined with the scale and landmark form of a multi-storey building in a sensitive rural landscape, makes it difficult

to conclude that relevant performance outcomes, such as PO 2.2, are genuinely satisfied.

While the EIS asserts that the use of contextual materials and earth tones will achieve an acceptable outcome, the visual impact assessment is limited in scope and independence, provides few representative viewpoints, and does not convincingly demonstrate that the proposal will read as recessive in key views or that cumulative visual effects on the rural landscape have been robustly tested.

The development does not currently meet the Planning and Design Code's PO 2.2 test for being subservient to the natural environment and avoiding adverse visual and landscape impacts.

The current proposal does not demonstrate compliance with the requirement that development in rural landscapes be recessive, landscape-, and visually subservient, and meaningful changes would be required before such a finding could reasonably be made. To address this, the proponent would need to reduce the height substantially, bulk and massing of the hotel, re-site built elements away from prominent and visually sensitive locations, and commission an independent visual impact assessment with representative viewpoints (including night-time conditions) and enforceable mitigation measures showing that adverse effects on visual amenity and rural character have been genuinely minimised.

If the proponent is unwilling or unable to implement these substantive design changes and to demonstrate, through an independent and transparent VIA, that the resort is visually recessive and subservient to the natural environment, the assessment authority should not conclude that PO 2.2 is satisfied or that the proposal aligns with the Planning and Design Code.

Social and Community

Inadequate Public and Cultural Consultation

The planning and consultation process for the SBWTAP has failed to demonstrate transparency, inclusiveness, or procedural fairness. *'Stakeholder engagement on the project commenced in early 2024 in the form of preliminary meetings with key stakeholders such as government agencies/representatives (Council, Local Members, State Government Departments) as well as relevant private entities (local property owners and occupiers, nearby businesses)'* (Appendix 6, p 7, section 2.4 Engagement Activities).

However, many directly affected residents, including all four families on Menzel Road (the road from which the hotel would be accessed), became aware of the proposal only through media coverage in August 2024.

The community was expected to review 1,767 pages of the EIS and appendices, plus 837 pages of referenced additional documents, within just 30 business days during the pre-Christmas and peak summer holiday period, making meaningful public input virtually impossible.

Engagement with Aboriginal and Traditional Owners was incomplete. The Cultural Heritage Assessment consulted only Kaurna representatives, consistent with the registered native title claim. However, it did not involve the Peramangk people, despite well-established evidence that areas of the southern Barossa possess significant cultural and historical associations for both groups. As a result, the perspectives and values of all relevant Traditional Owners have not been adequately identified, acknowledged, or assessed.

This approach does not reflect best practice in public participation or cultural heritage assessment.

The EIS fails to show that affected community members and Traditional Owners have been afforded a meaningful, culturally appropriate opportunity to understand, review and respond to the proposal, including adequate and accessible timeframes for consideration and submissions. In a context where the project affects Country, cultural obligations and long-standing community interests, this lack of robust, good-faith engagement with all relevant Traditional Owner groups (including Peramangk) and the wider community represents a severe procedural deficiency that undermines the legitimacy of the assessment process.

Because submitters and the broader community are not given a genuine opportunity to review and comment on the proponent's formal responses to submissions before any decision is made, outstanding concerns cannot be said to have been properly heard or addressed within the decision-making framework. Taken together, these consultation failures justify treating the EIS as procedurally inadequate and weigh heavily against approval of the development.

South Australian Tourism Commission (SATC) Sustainability, Social Licence, and the Barossa Cultural Landscape

The SATC Sustainability Roadmap makes clear that tourism in South Australia is expected to support communities, protect natural and cultural assets, and build social licence, not undermine them.

It defines sustainable tourism as tourism that fully accounts for economic, social, and environmental impacts, *'supporting communities to prosper'* and *'protecting our unique natural assets'*, and commits SATC to the ambition *'to be valued locally for our positive impact'*. The Roadmap states that South Australia aims to be *'a world leader in sustainable tourism'*, with tourism that protects nature, respects culture, and creates positive social impact for host communities.

It highlights that maintaining community satisfaction and social licence is now a priority worldwide, and that South Australia must proactively manage tourism and monitor community sentiment to avoid disruption and loss of support.

In May 2025, Member for Schubert Ashton Hurn tabled a petition with 1,217 signatures in Parliament for a new Barossa Hospital. In comparison, the petition specifically opposing the SBWTAP has now reached 1,184 signatures (27/11/2025), demonstrating similarly strong and passionate engagement with this issue.

Against this policy background, locating a large-scale, six-storey hotel on protected rural land in the CPD and SLP overlay, in a landscape that the Barossa community understands as its cultural heartland of viticulture and heritage, runs counter to SATC's stated intent to protect natural assets, conserve green space and maintain social licence.

The Barossa wine community operates as a distinctive cultural group built around vineyards, winemaking, landscape, and shared heritage. Yet, the EIS recognises the project is already polarising the community and acknowledges the risk of division, which is inconsistent with SATC's emphasis on reducing disruptive tourism outcomes and building positive social and cultural impacts.

Considering the SATC Sustainability Roadmap, government agencies should not support a tourism project on protected rural land that:

1. Undermines established green space and protection objectives in the CPD and SLP overlay rather than contributing to increased protected area outcomes; and
2. Proceeds in the face of evident community concern and social licence risks in a region explicitly recognised for its cultural landscape and wine identity.

The SBWTAP, as proposed, is inconsistent with SATC's own sustainability commitments. Decision-makers have a moral and policy duty to favour models of tourism growth that enhance Barossa's cultural and natural assets and strengthen social licence, such as high-quality developments in existing townships and appropriately zoned tourism areas, rather than on protected rural land.

The EIS does not demonstrate that SBWTAP has obtained social licence from the Barossa community for a development of this scale on protected rural land in a high bushfire risk area, nor that it aligns with contemporary sustainability expectations. In the absence of an independently reviewed sustainability and social licence statement that quantifies impacts on protected rural land and green space, provides robust evidence of community support (for example, via statistically valid sentiment research), and compares the proposal with township-based alternatives capable of delivering similar or greater economic benefits at lower environmental and social risk, the project should be regarded as inconsistent with the SATC Sustainability Roadmap and this weighs strongly against approval.

Community Benefit, Isolation, and Economic Leakage

The SBWTAP forecasts that approximately '*30% of the annual visitor market will comprise conference and associate visitors*' (Appendix 3, p 18, 3.2.3 Operational Phase Impact).

Placing a conference oriented resort on isolated rural land, with limited public transport and well known taxi and rideshare constraints (EIS, p 21, section 5.3.3, Accessibility, Barossa Leader Article, Fare Call: Local taxi service makes change ahead of rideshare rollout 5/2/2025) means delegates will be bused directly from Adelaide airport to the hotel and will remain largely captive within the complex.

In practice, most will sleep, dine, drink coffee, shop, and even visit a winery, all without leaving the site, as the only convenient wine-tasting experience will be the resort's own winery. This reduces opportunities to frequent main-street businesses in Lyndoch, Williamstown, or other Barossa towns, or to explore the valley's diverse vineyards.

The design and siting of the resort suggest a deliberate business model focused on maximising on-site capture of visitor expenditure within a single private facility, thereby concentrating economic activity and undermining broader regional benefit. By contrast, a large hotel and conference venue located within an existing township would naturally disperse spending across cafés, restaurants, shops, and cultural venues, and allow guests to venture out to visit a range of wineries and cellar doors. Instead of becoming an isolated tourist bubble on protected land, tourism infrastructure should be

positioned to meaningfully integrate with and support the community that sustains Barossa's reputation.

A township location would allow guests to easily walk to renowned local events such as A Day on the Green, Adelaide Fringe regional shows, AFL Gather Round, Barossa Vintage Festival, Red Hot Summer Tour, Santos Tour Down Under, and Tasting Australia regional events, enhancing visitor experience while strengthening ties between tourism and the local economy. This active integration delivers authentic engagement, encourages longer stays, and maximises direct benefits for local businesses, making Barossa's appeal both accessible and sustainable for residents and visitors alike.

The EIS does not provide a specific or detailed analysis of economic integration with local businesses or the wider community. Instead, it assumes that economic benefits will flow automatically, while failing to address the risk that an isolated conference resort will concentrate activity on-site. The document lacks substantive mitigation measures or strategies to ensure that tourism infrastructure contributes broadly to regional economic dispersal, rather than creating a self-contained enclave.

The resort has been deliberately configured as a self-contained destination, with conference delegates expected to be transported directly from Adelaide and most food, beverage, spa and recreation needs met on-site, which will further reduce incidental spend in townships. In a region whose tourism model has historically dispersed visitors through cellar doors, main streets and locally owned operators, this concentration of activity in a single, privately controlled facility represents a structural shift away from community-integrated tourism toward enclave-style consumption.

This shift carries long-term opportunity costs: local businesses may see reduced patronage at precisely the times when resort occupancy is highest, and the Barossa's brand as an open, village- and vineyard-based destination risks being overshadowed by a closed, resort-dominated experience that does not require guests to meaningfully engage with surrounding towns. In these circumstances, headline visitor numbers associated with SBWTAP may overstate actual regional benefit while masking significant leakage of expenditure into a single corporate platform.

The proposal fails to identify clear, equitable mechanisms that would ensure genuine community benefit or meaningful economic integration with the broader Barossa region. By deliberately configuring the resort as a self-contained destination, built to capture the majority of visitor expenditure within a single private complex, the development risks structurally diverting economic activity away from local businesses, main streets, and community events. As a result, projected regional benefits may be overstated while significant economic leakage into a closed corporate platform remains

unaddressed, meaning the proposal does not provide measurable or widespread advantages to the region.

Intergenerational Responsibility

Barossa has been entrusted to the current community by those who came before, and there is a collective responsibility to pass it on, largely intact, to those who come after. Young residents already articulate this clearly, describing the valley's vineyards, open spaces, gum-studded hills, and close-knit community as fundamental to their identity and their decision to live and work here. (Barossa Leader, Letters to the Editor 13/8/2025).

Approving a resort that contradicts the intent of the CPD and SLP overlay on such a prominent rural site would be a step towards normalising the erosion of those values.

The issue is not simply a trade-off between job creation and preservation. Instead, it is about ensuring the Barossa's long-term character and global significance are protected by directing development to appropriate locations. Allowing poorly sited projects risks undermining the landscape and community that are the foundation of the region's enduring reputation and prosperity.

The EIS does not address how the project will protect Barossa's rural character and community values for future generations. It fails to explain how the development aligns with the intent of the CPD and SLP overlay, or how intergenerational stewardship will be maintained.

The failure to provide a clear assessment of long-term impacts on landscape, community, and policy objectives, or to identify specific, enforceable measures to safeguard these values beyond short-term economic interests, means the proposal is not in the public interest.

Housing Strain, Inflation, Affordability, and Intergenerational Impact

In the Regional Development Australia Barossa Gawler Light Adelaide Plains November newsletter, regional priorities include addressing workforce shortages, improving housing availability and affordability, and supporting small businesses.

The SBWTAP proposal threatens to intensify housing unaffordability and rental scarcity, with impacts that will reverberate for future generations.

Barossa already faces a constrained and owner-dominated housing market: *'Limited housing diversity... and increased demand from tourism or worker demand could strain affordability over time. 79.5% of dwellings in Lyndoch are owner-occupied, well above*

the SA average of 67.4%. Only 18.4% of dwellings are rented, which may reflect limited housing availability for non-owner residents, seasonal workers, or young people. ... potential risks that tourism-related housing demand (e.g. short-term holiday lets or staff accommodation needs) could reduce rental availability or drive up housing prices. Local concern may arise if tourism developments are seen to undermine housing access or change the rural residential character of the area. (Appendix 22, p 16-17, section 3.2.5 Income & Housing Costs).

There is a clear risk that intensifying tourism will worsen the situation: *'Short-term rental demand may also rise, both from staff requiring accommodation during peak construction or operational periods and from increased tourism spillover. This heightened competition for housing could impact affordability and further reduce availability for existing residents, especially renters.'* (Appendix 22, p 37, section 4.2 Social Impact Matrix).

A development of this scale imports demand for labour and short-stay beds, making it *'harder for young people, renters, or local workers to find housing. This may create pressure on the rental market and cause concern about changes to the area's character and affordability.'* (Appendix 22, p 17, section 3.2.5 Income & Housing Costs).

These impacts will accumulate as more tourism employment is generated: *'A significant increase in tourism-related employment opportunities could also reduce the availability of housing for local workers and place increased pressure on the existing housing supply.'* (Appendix 22, p 28, section 3.7 Other Projects & Cumulative Impacts).

The economic modelling is also explicit on the risks of local inflation and cost-of-living pressures, stating: *'Large-scale development may contribute to localised inflation, particularly in housing and service costs. Increased demand from incoming workers and rising tourism activity could elevate rental prices, stretch availability, and shift affordability thresholds. This may impact both residents and small businesses, limiting competitiveness and raising the cost of living. If unaddressed, inflation could dilute some of the project's wider economic benefits and create equity concerns within the region.'* (Appendix 3, p 19, section 3.3.2 Inflationary Pressures).

Moreover, the influx of external workers is expected to stretch not just housing, but other vital resources: *'Furthermore, recruitment from outside the region could place added pressure on housing, transport, and essential community services.'* (Appendix 3, p 19, section 3.3.1 Labour Market Pressures).

In summary, SBWTAP will likely accelerate housing pressure and cost-of-living increases for locals, limiting opportunities for renters, young people, and vulnerable residents, undermining what future generations value in the Barossa. The proponent

has not adequately addressed in the EIS how they intend to mitigate the adverse impact of the SBWTAP on the local community.

The EIS does not provide adequate analysis or mitigation strategies for the foreseeable impacts of increased housing demand, affordability strain, and inflation resulting from the proposed development. It fails to address how rising worker and tourist numbers will exacerbate pressure on an already limited rental market, increase living costs for existing residents, or limit housing access for young people and vulnerable groups. The failure to clearly identify the cumulative effects of the development on local affordability and housing supply, or to commit to specific, enforceable measures to protect residents from displacement and rising living costs across current and future generations, means the proposal is not in the public interest.

Poaching and Labour Market Competition from and to Local Businesses

- *'During operations, the demand for approximately 150 FTE roles may inadvertently draw staff away from existing businesses. Backed by a globally established brand, the hotel may offer more attractive conditions, unintentionally disrupting staffing stability for smaller local enterprises.'* (Appendix 3, p 19, section 3.3.1 Labour Market Pressures).
- *'The proposed hotel and winery development has the potential to exacerbate existing labour shortages in the Barossa region, particularly in hospitality and tourism roles that may already face recruitment challenges. By increasing demand for skilled and unskilled workers, the project may intensify competition with other local businesses and industries for a limited pool of employees, potentially driving up wages and impacting staff retention.'* (Appendix 22, p 40, section 4.2 Social Impact Matrix).
- *'Factors contributing to this include a low unemployment rate, an aging workforce, and reduced labour force participation. Given regional shortages identified, large-scale recruitment could increase competition for labour.'* (Appendix 3, p 70, Regional Impact Assessment, p 10, Economic Assessment Criteria: Workforce).
- *'While the modelling clearly indicates net positive economic effects, it does not examine whether the influx of construction or tourism labour might compete with local wine, food, and manufacturing sectors for skilled labour or influence wage expectations or input costs.'* (Appendix 3, p 70, Regional Impact Assessment, p 10, Economic Assessment Criteria: Workforce).

- *'A significant increase in tourism-related employment opportunities could also reduce the availability of housing for local workers and place increased pressure on the existing housing supply. Larger tourist accommodation projects will require a significant influx of workers both during the construction and operational phases, providing local jobs and partnership opportunities with local training establishments... This may intensify competition with other local businesses and industries for a limited pool of employees, potentially driving up wages and impacting staff retention.'* (Appendix 22, p 28, section 3.7 Other Projects & Cumulative Impacts).
- *'The introduction of a major development like the SBWTAP may intensify competition for skilled workers, potentially leading to construction delays, cost escalations, or talent displacement across other local projects.'* (Appendix 3, p 19, section 3.3.1 Labour Market Pressures).
- *'Intensify competition with other local businesses and industries for a limited pool of employees, potentially driving up wages and impacting staff retention.'* (Appendix 22, p 40, section 4.2 Social Impact Matrix).

Nexus Barossa is under construction (EIS, p 27, section 5.3.6 Regional and International Identity), Oscar Seppeltsfield is due to start construction in December 2025, and the Sandy Creek Tourism Project is currently under review (EIS, p 27, section 5.3.6 Regional and International Identity).

Taken together, these findings highlight a clear risk: each additional large-scale rural tourism development, such as SBWTAP, compounds workforce pressures in a region already experiencing skill shortages in hospitality, tourism, and related sectors. The EIS and its appendices repeatedly reference the dangers of *'talent displacement'* and *'intensified competition for skilled workers'* (Appendix 3, p 19, section 3.3.1 Labour Market Pressures), outcomes likely to result in higher wage expectations, retention difficulties, and operational strain for existing small- and medium-sized local businesses. With several major hospitality and tourism projects concurrently planned or underway, the potential for inflation, recruitment shortfalls, and instability for established enterprises is becoming an increasingly pressing concern.

The proponent has not sufficiently addressed in the EIS how they plan to mitigate the risk that SBWTAP will intensify competition for staff within an already tight local labour market. The EIS does not adequately address or propose mitigation for this risk. It fails to demonstrate how poaching, wage escalation, and retention pressures on small- and medium-sized Barossa businesses will be managed, especially given the cumulative impacts of concurrent tourism developments. While increased employment opportunities are positive, the absence of a plan to mitigate adverse effects on local

businesses could easily negate those benefits. The lack of any such planning weighs heavily against the proposal.

Transport and Traffic

Severely Limited Public Transport, Taxis & Rideshare Services Isolate Hotel Guests.

The EIS and Traffic Assessment confirm regional public transport is '*limited, reflecting the area's rural character and relatively low population density*' (Appendix 10, p 10, section 2.5 Public Transport) and serves mainly school and essential community needs, with infrequent or non-existent weekend/public holiday services.

Uber and rideshare were only authorised in mid-2025 and have a limited presence, with their introduction, local taxis ceased '*a number of their usual taxi services*' (Barossa Leader Article, Fare Call: Local taxi service makes change ahead of rideshare rollout, 5/2/2025) 'Taxis are refusing to work after 5 pm... So many horror stories!' (Ashton Hurn MP Facebook comments) leaving the region effectively unserved by commercial car transport in the evenings.

The EIS states that around 30% of guests are anticipated to be conference delegates. At the June 2025 information session, an Ekistics spokesperson said they expected many delegates would be bused up from Adelaide airport.

This means most guests, specifically those without vehicles, will be isolated at the resort, unable to access the broader Barossa economy or safely travel for off-site dining, tours, or emergencies. The project's assertion that Uber offers flexible options is undermined by the area's well-known lack of vehicles and drivers, as reported in local media and acknowledged in the EIS (p 21, section 5.3.3 Accessibility).

Lack of Integration with the Wider Economy

The development's promotion as a destination resort, combined with limited off-site transport, guarantees that many guests and event delegates will remain isolated at the resort rather than integrating with and benefiting the wider Barossa business community, directly contradicting regional economic development goals around spread and engagement.

Inadequacy and Upgrading of Local Roads

The existing rural roads (Hoffnungsthal, Menzel, and Tweedies Gully) were not designed for the level of usage proposed and will require significant upgrades, including shoulder sealing at the Hoffnungsthal and Lindner intersection; yet, shoulder sealing is likely inadequate for forecast heavy use by buses, service vehicles, and winery freight movements. (Appendix 10, p 27, section 6.2.2 Detailed Review).

Under-Provided and Poorly Distributed Parking for Winery and Events

In Appendix 10 (p 15–16, section 4.1 Winery), the proposal provides only 115 parking spaces for the winery, function centre and associated uses, against a planning code calculation of 176 spaces, while allocating 219 spaces to the hotel accommodation. This results in a substantial and inadequately justified shortfall for winery and event uses, based on optimistic assumptions about high car occupancy, shared use with hotel guests and frequent bus arrivals, none of which are supported by local empirical data or independent surveys. Taken together, the inconsistent over-provision for the hotel and under-provision for the winery and events, in a context of limited off-site transport options, means total parking is unlikely to ‘meet or exceed’ actual demand and instead creates a high risk of overspill, unsafe and informal parking and associated access and amenity impacts concentrated around the winery, function areas and adjoining local roads.

Heavy Vehicle and Freight Impacts Overlooked

The traffic forecasts and road upgrade recommendations almost entirely focus on guest, staff, and function visitor car and bus movements, rather than providing a clear, quantitative breakdown of the number or frequency of heavy vehicle (truck/grape delivery/bulk wine transport) trips.

While it is briefly stated that *'commercial vehicle access and circulation arrangements will also accommodate buses for customer access'*, and that *'the site must accommodate movements for large service and delivery vehicles including rigid vehicles typically associated with front-lift bin collection and keg delivery, as well as 12.5 m long large buses'*, (Appendix 10 p 13 section 3.2.2 Tourist Accommodation Site) there is no specific modelling or assessment of the cumulative wear and tear caused by grape truck freight and heavy vehicle traffic, nor is there an explicit estimate of loads associated with processing 500 tons of grapes. This is a significant omission, as heavy truck movements during vintage grape delivery and bulk wine transport for bottling will have a greater impact on local road wear and safety than estimated for visitor traffic.

Heavy Vehicle Road Wear and Ratepayer Exposure

Large resort hotels and wineries generate a significant increase in heavy vehicle movements during both construction and ongoing operations. Heavy vehicles are the dominant driver of road deterioration, and their axle loads are a critical input to the design of appropriate road construction and maintenance regimes.

Despite this, the Traffic and Access Assessment (Appendix 10) does not undertake any impact analysis based on heavy vehicle axle loads. It counts vehicle trips and qualitatively describes road upgrades, but does not convert forecast heavy vehicle movements into Equivalent Standard Axles or similar metrics used in contemporary design to estimate cumulative road wear. As a result, there is no assessment of incremental deterioration, reduced life or increased maintenance liabilities arising from the development's freight task. The EIS likewise does not address design life or maintenance needs related to heavy vehicle axle loading.

Taken together, this represents a significant omission: the traffic work may be adequate for intersection performance and capacity, but it fails to address the core question of how quickly local roads will be worn out by intensified freight movements and who will bear the associated renewal costs.

Further, any substantial upgrade of Hoffnungsthal Road required to accommodate the development's additional traffic and freight task should not be socialised onto local ratepayers.

The existing community did not create the step change in heavy vehicle movements associated with construction, winery operations, and hotel servicing; that increase flows directly from the private proposal.

In these circumstances, it is reasonable to expect the proponent to fund, or at a minimum substantially contribute to, the full cost of any major upgrade along the Lyndoch Valley Road–Hoffnungsthal Road approach to the site, rather than leaving Barossa Council and its ratepayers to subsidise freight and guest access for a single commercial project.

Road Intersection and Evacuation Risks

The assessment admits that the intersection of Hoffnungsthal and Lindner Road is currently sub-standard and, even after acknowledging it as an *'existing deficiency'* (Appendix 10, p 27, section 6.2.2 Detailed Review), states that *'simultaneous passage of a commercial vehicle (such as a Heavy Rigid Vehicle) and a car (B99 design vehicle) could not be accommodated'*. The likelihood and severity of conflicts would increase with increased traffic due to the development. However, meaningful upgrades are

limited by 'large (significant and/or regulated) trees' (Appendix 10, p 27, section 6.2.2 Detailed Review), 'for which removal would unlikely be approved', leaving ongoing hazards.

This will be exacerbated in emergencies (including bushfire evacuation), when the slow, narrow, and potentially blocked access routes heighten risks to guests, staff, and emergency responders.

Winery Freight and Access Loads

The EIS states that the winery's production capacity is up to 500 tons. With only 10-11 hectares of vines on site (an estimated yield of 57 tons based on Barossa's average yield of 5.2 tons per hectare from 2000-2025), 443 tons, or 89% of the grapes, will be delivered by truck, significantly increasing heavy vehicle movements. Crucially, the narrow, rural access roads were never intended to handle this volume or weight of traffic, with adverse impacts on shoulder life, road safety, and residents' amenity.

Funding and Ratepayer Risk

The EIS notes that road widening and upgrades will be needed, but concedes that *'it is likely that Council will seek such works to be addressed as part of the development.'* (Appendix 10, p 27 6.2.2 Detailed Review). If upgrades are not developer-funded, ratepayers will face higher costs for initial upgrades and ongoing maintenance due to substantial traffic increases, an unfair burden on the local community.

The limited space for road widening due to significant tree controls could lead to unresolved safety issues (Appendix 10, p. 27, 6.2.2 Detailed Review).

The report fails to demonstrate clearly: how all guests, staff and delegates will realistically travel to and from the site across weekdays, weekends and evenings; how local roads and intersections will be adequately upgraded, funded and maintained without shifting costs onto ratepayers; how freight and service vehicle movements associated with winery operations will be safely accommodated; and how safe access and evacuation will be assured under both regular and emergency conditions. It also fails to provide robust, independently evidenced peak-period parking demand analysis and a credible contingency plan for major events. In short, the proposal fails to demonstrate safe, sustainable and equitable access. All of these unresolved transport and traffic impact issues count significantly against approval.

Water, Wastewater and Waste Management

Excess Wastewater

The total wastewater generation at the site is approximately 26.4 ML/year (Appendix 16, p 1, 1 Executive Summary).

Barossa vineyards apply on average 1.1ML/ha of water (Sustainable Winegrowing Australia Regional Annual Results Barossa 2023/24).

The dispersal area for the treated wastewater is the existing vineyards on site. In total, the area available for irrigation is 10.7ha (Appendix 16, p 1, 1 Executive Summary).

Therefore, the irrigation requirement based on the Barossa average water use is 11.77ML (1.1ML x 10.7ha).

The balance is 14.63ML (26.4ML – 11.77ML).

Over the wet winter months, excess water will be stored in the 10.5 ML on-site dam (Appendix 16, p 1, 1 Executive Summary).

The excess is 4.13ML (14.63ML - 10.5ML).

On the proponent's own figures, the development would generate approximately 26.4 ML of wastewater per year, while the combination of vineyard irrigation and on-site dam storage can accommodate only about 22.27 ML, leaving an annual shortfall of at least 4.13 ML with no clearly defined, lawful disposal pathway. This is not a marginal discrepancy that can be tidied up through minor design refinement; it is a structural capacity gap that makes the current wastewater concept unworkable on this site.

In a setting with shallow, stressed groundwater relied upon by neighbouring properties, and where stormwater is hydraulically connected to local watercourses and aquifers, any persistent effluent surplus translates into an unacceptably high risk of nutrient, pathogen or chemical contamination. The absence of baseline groundwater quality data, monitoring bores, climate-resilience modelling or a robust contingency framework reinforces that the wastewater strategy rests on theoretical modelling rather than demonstrated site capacity.

Treating wastewater as a matter that can be deferred to post-approval conditions is inconsistent with the precautionary intent of impact assessment and with the PDI Act requirement to understand environmental risks before granting approval. In its current form, the wastewater system alone provides a sufficient and independent basis for refusal because the physical characteristics of the site do not support the safe disposal of the projected effluent load from a ~1,000-person resort and associated winery.

Groundwater and Bore Risk

Appendix 16 (p12, Section 5.5 Groundwaters) acknowledges that the site's groundwater is shallow, declining, and directly used by neighbours. The development will add significant wastewater and stormwater inputs. Even with the proposed treatment systems, there is a real risk that nutrients, chemicals, or pathogens could leach into the water table and pollute nearby bores, especially in wet years or when systems fail. Neighbouring bores are at risk. (Appendix 16, p 29-37 Table under Source of Risk).

Stormwater Concerns

The EIS (p127, section 10.7.3.3 Stormwater Management Strategy) confirms that stormwater is set to be discharged into an existing on-site watercourse. This watercourse can recharge the groundwater. Increased runoff from roofs and hard surfaces will carry contaminants, and detention systems may not handle extreme storms—raising the risk of untreated flows reaching the water table and affecting aquifer quality. The risk of untreated water reaching bores during heavy rainfall remains unacceptably high.

Wastewater Risks

The treatment and reuse system relies on ongoing maintenance; any breakdown or mismanagement could result in contamination. The risk assessments do not guarantee protection during all rainfall events or over the project's lifetime, especially as groundwater depth fluctuates.

Lack of Oversight

There is no independent, ongoing groundwater monitoring, nor is there community access to water quality data. Neighbours face unacceptable risk with no compensation if their water is impacted.

Proponent Requirements: Water, Wastewater, and Stormwater Management

The absence of:

1. A robust contingency plan for safe management of all excess treated wastewater during periods of low irrigation demand, wet weather, or system failure.
2. Rigorous, independent groundwater and bore monitoring programs, with regular sampling and reporting of water quality results to both authorities and the community.

3. Automatic system shutdown protocols and immediate notification procedures if contamination is detected in groundwater, bores, or surface water.
4. Acceptance of full liability and provision of assured, funded remediation for any confirmed water contamination affecting neighbouring properties, including compensation and restoration of bore water supplies.
5. A stormwater management system that eliminates direct discharge into on-site watercourses, with enhanced controls to prevent stormwater and contaminants from recharging the groundwater.
6. A commitment to ongoing, independent review and transparent reporting of all water management system performance, with accessible data for community stakeholders.

As these protections and commitments are not fully implemented and enforceable, the risk to local water supplies remains unacceptable and weighs heavily against approval.

Waste Storage and Handling Risks

The EIS and appendices show significant volumes of solid and liquid waste generated from hotel and winery operations, including hazardous chemical residues, putrescible waste, and winery by-products. The plans for on-site storage, temporary containment, and transport create multiple points where spills, leaks, or odours could impact neighbours and the environment.

Collection and Disposal Concerns

The EIS and appendices indicate reliance on external contractors and local infrastructure for waste removal. There is no certainty around waste pickup frequency, response to contractor failure, or contingency for excessive waste. Itemised protocols for hazardous material management and emergency response are vague or omitted.

Wastewater Integration Issues

The risk of cross-contamination between solid waste storage and stormwater/wastewater systems is not fully addressed, especially during high traffic or adverse weather events. The lack of strict separation raises concern about pollutants entering the water cycle.

The proponent has failed to:

1. Develop and publicly release a comprehensive waste management plan, with clearly defined protocols for segregation, containment, contractor oversight, and emergency procedures.
2. Provide evidence of secure waste storage infrastructure designed for flood and spill resilience.
3. Establish independent monitoring of waste storage and disposal, with transparent reporting.
4. Guarantee backup arrangements for waste removal if contractors are unavailable.
5. Commit to regular review and updating of waste procedures, with input from local community stakeholders.

In the absence of these guaranteed and verifiable measures, waste management poses an unacceptable risk to public health, the local environment, and neighbouring properties, and counts significantly against application approval.

Storm Water

Civil and Stormwater Management (Appendix 18)

Inadequate Reliance on the Silted Downstream Culvert and Informal Drainage

The stormwater strategy relies on a heavily silted 600 mm Hoffnungsthal Road culvert and informal rural drains to convey concentrated post-development flows from the site, assuming these assets will be cleaned and function at full capacity in the future. The report acknowledges siltation and gaps in the survey of key watercourses, yet uses these elements as critical control points for assessing flood risk. This creates dependence on third-party infrastructure and optimistic maintenance assumptions, rather than providing a self-contained on-site solution.

Conceptual Stormwater Design and Unverified Modelling Assumptions

Key stormwater management elements (drainage, basin geometry, scour protection, overflow paths) are deferred to later stages, yet the scheme claims compliance with peak flow and flood objectives. Critical assumptions regarding culvert performance and drainage geometry are made without surveyed data, and the assessment relies on models rather than physical safety margins, particularly in the context of climate change. This undermines confidence in the proposed controls' efficacy.

No Guaranteed Detention Despite Increased Imperviousness

The development increases the impervious area at both the hotel and winery, but provides no on-site detention, relying instead on modelled '*timing offsets*' to justify this. This approach is model-dependent, could increase downstream flood risk, especially as land use or rainfall patterns evolve, and does not offer a physical margin of safety.

Uncertain Performance of '*Retention Only*' Basins in Clay Soils

'*Retention only*' basins are proposed with reliance on soakage and evaporation to manage frequent flows, but the site is underlain by clay soils with very low permeability. There is no permeability testing or drawdown calculation provided to confirm that these can empty between events, raising the risk of chronic wetting, reduced water quality, and local instability.

Insufficiently Committed Water Quality and WSUD Outcomes

EPA stormwater pollutant reduction targets are claimed through conceptual MUSIC/WSUD measures, but no final treatment train design or an enforceable maintenance program is provided. Modelling uses standard parameters rather than site-specific values, leaving the claimed reductions unproven and vulnerable to later cost-cutting in design or maintenance.

High Risk Bulk Earthworks on Steep, Erosive Terrain

Extensive cut-and-fill is planned over sloping, clayey ground, but the treatment of material suitability, disposal, staging, and erosion control is addressed only in generic terms. Without clear, enforceable management plans, there is a significant risk of erosion, sediment loss, and downstream impacts during construction.

Weak Construction Phase Stormwater and Sediment Controls

Although construction-phase risks are acknowledged, specific drainage and sediment management plans are deferred to the future. This increases the short-term risk of significant runoff, erosion, and pollution during major earthworks, posing a threat to downstream properties and watercourses.

Uncertain Flood Immunity and Public Safety

Flood protection relies on modelled freeboards, assumed section capacities, and best-case maintenance, with minimal allowance for blockage, inlet failure, or cumulative flood events. Without a worst-case scenario analysis, the resilience of public roads, evacuation routes, and buildings remains unproven.

The Proponent has failed to:

1. Undertake a complete, independent survey of all downstream watercourses and culverts; design a self-contained on-site drainage system not dependent on Council culverts; and enter a binding agreement for ongoing inspection and maintenance of these assets.
2. Submit a detailed, independently peer-reviewed stormwater design (including surveyed catchment data, overflow paths, climate change sensitivity, and full pipe/channel sizing) for public exhibition before planning consent.
3. Provide physically sized on-site detention for both the hotel and winery, as required to ensure post-development flows do not exceed pre-development rates for key flood events, irrespective of timing assumptions.
4. Conduct geotechnical and infiltration testing; redesign basins for reliable drainage and maintenance; and provide a long-term, enforceable maintenance and inspection program.
5. Deliver a fully specified and committed WSUD treatment train, including final pollutant removal modelling and a binding, independently monitored maintenance program for at least five years.
6. Produce a detailed, certified earthworks, erosion, and sediment management plan, including progressive rehabilitation and an independent audit of construction-phase controls.
7. Complete a comprehensive, site-specific SEDMP for construction, monitored and enforced by an independent auditor with clear thresholds and shutdown criteria.
8. Carry out robust, peer-reviewed flood risk and safety assessments, including blockages, failures, climate scenarios, and safe egress/access planning, with results informing infrastructure upgrades before consent.

Because these protections and commitments are not fully implemented or enforceable, the risk to local water supplies remains unacceptable and weighs heavily against approval of the application.

Noise

Inadequacies in Noise Assessment

While baseline noise monitoring has been completed, the hotel assessment relies on assumed activity scenarios and mitigation recommendations that may not be implemented or independently verified post-construction. There are no requirements for ongoing operational noise monitoring or compliance audits, no formal engagement with local sensitive receivers regarding noise management, and no robust cumulative impact modelling. Controls on music and outdoor events are advisory only and lack legally enforceable limits, potentially exposing the community to future noise nuisance and amenity loss.

The EIS does not provide a clear or enforceable framework to manage and monitor operational noise from the hotel, functions, outdoor areas and plant, leaving substantial uncertainty about compliance with amenity thresholds and protection of nearby residents.

In the absence of:

1. Detailed post-construction noise monitoring at all nearby sensitive receivers, with data publicly reported and made subject to regulatory review.
2. Periodic operational compliance audits, particularly during peak function periods and evening/night hours, to ensure noise and music from the hotel, outdoor areas, and plant rooms do not exceed predicted impacts or amenity thresholds.
3. All acoustic mitigation measures recommended in the EIS as mandatory, enforceable consent conditions, including design verification before occupancy and routine compliance checks.
4. A comprehensive Community Noise Management Plan, including clear protocols for complaint response, adaptive management measures, and direct engagement with affected residents regarding their concerns, sensitivities, and desired outcomes.
5. Enforceable limits and event management protocols for all outdoor functions, music, and nighttime activities, with full input from local stakeholders. These controls should be included in the approved Operational Environmental Management Plan and reflected in the conditions of any development consent.
6. Commitment to reassessment of cumulative noise if other developments or new sources of regional noise arise during the hotel's operational life.

Due to these unresolved gaps and uncertainties, the development cannot be regarded as acceptable or in the public interest and weighs strongly against approval.

Light

Inadequacies in Lighting Assessment

The lighting impact assessment is desktop-only and provides no empirical measurement or characterisation of current night-time darkness, skyglow, or light trespass in the surrounding rural area. As such, actual baseline conditions and the degree of change and amenity loss cannot be robustly assessed. Assessment of the impacts of obtrusive lighting on wildlife and the preservation of the rural nightscape is based on modelled compliance and general mitigation principles, with final verification deferred until future design stages. No controls or adaptive management are mandated for operational years, and the process lacks a transparent avenue for community engagement or complaint resolution.

The EIS fails to provide a defensible lighting assessment and management framework, leaving unacceptable risks to local amenity, ecological values and the rural night sky.

The proposal does not:

1. Include a comprehensive baseline night-time light survey before construction, including skyglow, direct light spill, and visual observations at key sensitive receptors and ecologically sensitive boundaries.
2. Make post-installation photometric audits and compliance reporting mandatory and require all lighting installations to be subject to a binding, enforceable light management plan.
3. Impose species-specific and location-specific limits for lighting intensity, duration, and spectrum, especially near mapped wildlife habitat, watercourses, and residential dwellings.
4. Mandate ongoing operational monitoring, with regular reporting and direct opportunities for affected residents to register complaints or request adaptive mitigation.
5. Set explicit curfew periods and darkness preservation zones that reflect the regional character and community expectations, as binding consent conditions.

In the absence of enforceable, measurable safeguards, light pollution impacts cannot be reliably contained, which weighs heavily against approval.