#### https://yoursay.sa.gov.au/barossa-eis/surveys/barossa-eis

- 1. Name
- 2. Email

### 3. What is your interest in the draft EIS?

- Local community member
- Local business owner
- Local property owner
- Interested individual
- Local government
- Community group
- Development industry
- Non-government organisation
- State Agency
- Member of Parliament
- Other (please specify)

### 4. Do you support the construction of the SBWTA

- Definitely agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree

### • Definitely disagree

## 5. The proposed location was selected based on criteria including land availability, water and power supply and land use Zoning. What are your thoughts on the proposed location?

The location is inappropriate and conflicts with the Character Preservation Act's protected rural land and Significant Landscape Protection overlays, which are designed to preserve viticulture and landscape character.

The site is in a high bushfire-risk area with steep slopes, past fire history, inadequate access for emergency evacuation, and limited public transport.

The site lacks basic infrastructure: existing on-site water is unsuitable, so a mains water connection is required; the existing power supply requires new transformers; and there is no suitable wastewater, stormwater, or road infrastructure for a development of this scale.

The SBWTAP's stacked rectangular modules resemble shipping containers and lack authentic Barossan architectural character.

Better alternative locations exist within townships and tourist development zones that would avoid landscape, bushfire, and biosecurity risks, utilise existing infrastructure, and align with planning policy. The site selection has not been transparently justified against safer, less constrained alternatives.

## 6. The development site is surrounded by various horticulture, agriculture and commercial businesses. Do you have any feedback on how the development may interact with existing land uses and business in the area?

The site is rural and isolated, with most surrounding businesses focused on primary production. Nearby commercial activity is limited to Barossa Helicopters (which also hosts the Barossa Rodeo for one day a year), Lyndoch Lavender Farm, The Dairyman Barossa (primary production with off-site food sales and on-site tourist accommodation), and Norm's Farm, which offers tourist accommodation.

The development poses significant biosecurity risks to surrounding vineyards, including the potential introduction of phylloxera due to high visitor turnover, yet insufficient measures are proposed to address this risk.

Stormwater runoff, erosion and possible groundwater contamination from wastewater could harm neighbouring properties and primary production.

The self-contained resort model risks economic leakage with limited benefit to local towns and businesses, while competing for scarce skilled hospitality and construction labour and placing pressure on local housing and rental availability.

As a self-contained resort, the development concentrates visitor spending on-site rather than dispersing benefits through Barossa townships and existing businesses.

Traffic, noise, light spill and visual intrusion will negatively impact the rural amenity that existing businesses and residents depend upon.

# 7. The facility is expected to create approximately 461 FTE construction jobs and 229 FTE ongoing jobs once built. What are your thoughts on the benefits that the facility will have for the local Barossa economy and South Australia more generally?

The employment claims look optimistic and ignore significant downsides and risks. Construction and hospitality labour is already scarce in the region and will be further exacerbated by workforce demand from the Nexus and Oscar projects.

The project may displace workers from existing businesses rather than create net new employment. There is no transparent analysis of cumulative hotel supply (existing Novotel, new Nexus and Oscar projects under construction or starting soon), raising serious concerns about oversupply and long-term viability.

A self-contained rural resort will generate limited spending in local townships and may damage the Barossa's premium brand positioning. The development jeopardises the Barossa's World Heritage bid, which has clear evidence of delivering far greater financial benefit and increased tourism than an isolated resort ever could.

Housing pressure, workforce displacement, infrastructure costs (roads, emergency services, water, power) borne by ratepayers, and inflation-driven cost escalation would seem to outweigh any claimed benefits.

Contemporary SATC data shows declining visitation, with occupancy around 60% — not supporting a shortage of rooms claim. Existing Novotel, Nexus (under construction) and Oscar (construction starting December 2025) already serve the premium market.

### 8. If concerned about the development, what are the main planning and/or environmental issues that the assessment should focus upon?

The EIS has critical gaps and omissions across multiple disciplines:

- Lack of transparency: Withheld feasibility report, refusal to name the winery operator (if one exists), and no right of reply for the community on feedback gained from submissions.
- Bushfire assessment error: The EIS contains a critical error: topography used appears to be from Naracoorte rather than the actual site (14.5–15% slopes).
  Single evacuation route cannot safely handle simultaneous CFS and civilian evacuation.
- **Bushfire:** The site is completely unsuitable, with a high bushfire risk in the foothills of the ranges, posing an unacceptable risk to guests, the local community and the wider region, with incorrect site topography referenced, no commitment to closure on Extreme days, unsafe access/evacuation, and insufficient local firefighting equipment for a large six-storey building.
- **Demand and alternatives:** No assessment of oversupply risk with Novotel/Nexus/Oscar, no genuine comparison of township alternatives, missing winery operator, no GHG assessment for construction emissions.
- **GHG and location choice**: No comparison of GHG emissions from constructing and servicing the large rural SBWTAP resort with building a similar facility in an

existing township, where use of existing roads, services, and infrastructure would significantly reduce embodied and operational emissions.

- Land use and heritage: Conflict with Character Preservation Act and Significant Landscape Protection overlays, biosecurity risks, and inconsistency with World Heritage aspirations.
- **Visual impact and design:** Six-storey building not visually subservient, highly visible from main roads, shipping-container design not authentically Barossan.
- Water, waste, noise, light: Inadequate groundwater and stormwater assessment, risks to neighbouring properties, insufficient site-specific baseline light studies, unresolved and unenforceable noise management arrangements
- **Social and cultural:** Inadequate consultation with Traditional Owners (Peramangk people not consulted), affected residents initially excluded, limited social licence.
- **Economic:** Inflation impacts on construction costs and viability are not addressed.
- Wastewater crisis: The site generates 26.4 ML/year wastewater but can only manage 22.27 ML via irrigation and dam storage a 4.13 ML annual shortfall with no lawful disposal pathway, risking groundwater contamination.
- **Withheld demand evidence**: The central 2023 Hotellerie demand study remains confidential, preventing public scrutiny of the project's core justification.
- Planning procedure concern: State assessment pathway bypassed local council, removing critical local oversight of Character Preservation Act compliance.

#### 9. How could the development be improved?

The development should be relocated to a township or tourism development zone with existing infrastructure, lower bushfire risk, better access and services, and no conflict with protected landscape overlays.

The proponent has not publicly released any demand or feasibility studies, has not identified or secured a committed winery operator, and has not demonstrated sufficient demand given the existing and approved large-scale supply at Novotel, Nexus and Oscar. It has not undertaken multi-season baseline environmental studies (including site-specific noise and light), committed to mandatory closure on Extreme fire danger days with safe evacuation, or reduced hotel height and bulk to achieve genuine visual subservience and authentic Barossan character. There has been no transparent consultation with Peramangk Traditional Owners, no opportunity for submitters to respond to the proponent's submission feedback, no complete construction GHG

assessment, and no truly independent, enforceable assessments of bushfire, water, biosecurity (including phylloxera), traffic and social impacts—failures that together justify refusal rather than conditional approval.

Given wastewater deficiencies, bushfire risks, and withheld demand evidence, relocation to a township is the only viable improvement.

### 10. Do you have any other feedback about the EIS that you would like to share?

The EIS fails to meet the assessment requirements for transparency, rigour and completeness. Key reports are withheld, baseline studies are missing, the winery operator is unnamed (if one exists at all), and there is insufficient evidence of demand, social licence or environmental safety. The proposal conflicts with the planning framework designed to protect the Barossa's cultural landscape, rural character and World Heritage potential. Approving this development would set a dangerous precedent for a large-scale urban-style tourism project in protected rural areas. It could jeopardise the region's World Heritage bid, which offers far greater long-term economic and tourism benefits. Therefore, the Minister and State Planning Commission should refuse the proposal.

I endorse the 'Preserve and Protect Barossa' submission available at https://preserveandprotectbarossa.org/PreserveAndProtectBarossa-SBWTAP-Submission.pdf