

Reference:

17 November 2025

Attention: Minister for Planning
c/- Mr Robert Kleeman
Manager – Crown and Impact Assessment
Department for Housing and Urban Development

By email: spreps@sa.gov.au

Dear Hon Minister Champion MP,

Strategic Alliance EIS Submission

Thank you for the requesting Council's comment in relation to the Southern Barossa Winery and Tourism Accommodation project pursuant to Section 113(5)(a)(iii) of the *Planning, Development and Infrastructure Act 2016*.

This submission provides Council's considered opinion in relation to the proposed development and provides detailed comments under key headings.

Summary

In summary, Council has had significant challenges with the development in that it presents strong arguments for support but also as a Council that has unique legislative conditions upon which it has to preserve the character and has listened to many in its community, the overall submission is balanced against improved design and infrastructure outcomes whilst raising long term rural land use policy direction and character.

The comments are largely focused on the hotel component, however, raise that no matter your decision and with community input and work Council is undertaking in 2026 clear character policy with the Planning and Design Code in partnership with your commitment in the Greater Adelaide Regional Plan (GARP) to address these issues in 2027.

We welcome the opportunity to make comment and outline caution in your decision making to ensure the balance of development and character is maintained.

This submission acknowledges the significant scale of the tourist development. While the proposal introduces substantive built form into a locality that is presently devoid of this form of development, the design is responsive to the site and has a low visual impact upon the locality.

The assumption that there is sufficient demand to sustain multiple major resorts should be further considered, given there is potential for hundreds of new rooms to come online in the Barossa as a result of the proposed Nexus, Oscar, Sandy Creek Resort and this proposal. Transport availability and access to workers are also fundamental issues that warrant further consideration.



The Barossa Council

Some concerns regarding the combined wastewater and trade waste system are also identified as well as in relation to the bushfire hazard assessment.

If approved, an infrastructure agreement with Council will be essential to facilitate road upgrades required to support the development.

Demand for the project

The proposed tourist accommodation resort is stated to fill a known gap in the market for luxury, branded accommodation and is expected to attract new visitor segments, including international guests and conference delegates. The market analysis suggests that even if other approved projects proceed, there will be sufficient demand to sustain multiple providers.

Hotel demand for the project has been assessed on the basis of a Scoping Study undertaken by Hotellerie in 2023 and examined tourism trends, accommodation performance and market gaps in the Barossa. This Scoping Study remains confidential and it is therefore difficult to validate the market analysis regarding demand, especially in relation to the multiple proposals that are currently approved/proposed.

The assumption that there is sufficient to sustain multiple major resorts should be further considered, given there is potential for hundreds of new rooms to come online in the Barossa as a result of the proposed Nexus, Oscar, Sandy Creek Resort and this proposal. While competition among proposals is part of ordinary market dynamics, there is a need to avoid oversupply.

Notwithstanding above, it is noted the development of a 4-5 star accommodation product is a priority of the SA Regional Visitor Strategy.

Size of development

The scale of the proposed hotel far exceeds the numerical standard quoted in DPF 6.3 of the Rural Zone of 100m² and it is noted this is one of the reasons for the declaration of the development as an Impact Assessed development, given that the project cannot be properly considered under existing pathways (ie. as a code assessed development against the Planning and Design Code). Pursuant to the judgement of Geber, resort scaled development should be located in Tourism Development Zones.

Performance Outcome 6.3 of the Rural Zone seeks:

PO 6.3

Tourist accommodation is associated with the primary use of the land for primary production or primary production related value adding industry to enhance and provide authentic visitor experiences.

The proposal will be associated with the use of the land for viticulture, albeit it is substantially larger in scale than anticipated in the Rural Zone.

It is noted the GARP released on 17th March 2025 proposes a Code Amendment for the Character Preservation District to support local government in pursuing improvements to the Character Preservation District Overlay to reinforce the character values in the Barossa Valley whilst supporting primary industries. In this regard, The Barossa Council is committed to working with the State to undertake the necessary investigations to support this Code Amendment. As part of this work, there is a need to review the criteria for resort scaled development.

The review of the Character Preservation District also has synergies with the proposed action within the GARP to undertake a Code Amendment focused on 'Tourism Development' within wine regions to protect valued landscape character.

Scale, siting and design

The scale, siting and design of the hotel is one of the most challenging aspects of the proposed development. It is acknowledged the design element in particular is highly subjective and that opinions may differ widely in relation to the acceptability of the architectural design for the site.

The building is proposed to be six storeys in height, set well within the site and below the ridgeline, with the objective of minimising visual prominence. It is noted an amendment to the design has occurred since the original design was conceived to lower the eastern building flank by 3m.

The building is arranged in response to the site's topography, with the building being terraced on the contour lines to preserve existing views and facilitate passive solar access. The architecture adopts a low-profile horizontal massing strategy, utilising natural and locally sourced materials such as timber and stone.

It is noted the building has gone through two rounds of design review with the Office for Design and Architecture SA (ODASA). While the Design Review advice is not provided within the EIS documentation, the EIS notes feedback supports the project's ambition to integrate architecture and landscape site cultural sensitivity, site-specific design and connection to country.

The ODASA comments suggest there are elements of the design that should be further refined to better anchor the hotel within the landscape and to reduce visual dominance. It is considered the overall design is considered to be broadly acceptable but there is opportunity to further respond to ODASA's feedback.

It is noted the proposal includes the preservation of the vineyard frontage together with a strong landscape strategy that incorporates use of vegetated buffers. These elements further seek to limit the visual impact of the hotel in the landscape, in particular, the southern elevation visible to the land upslope at the rear.

In relation to the winery development, the building incorporates articulation in the form of the broken up gable roof forms. This is considered broadly acceptable. It is noted the development incorporates fire tanks, rainwater tanks and a pump room forward of the building which are prominent and could be resited to reduce their visual impact to the street.

Landscape and visual impact assessment

A Landscape and Visual Impact Assessment (LVIA) has been prepared by Landskap that provides an assessment of the suitability of the development in the existing landscape context. The LVIA concludes the proposed hotel will have a low visual impact on the local area noting that:

- Limited public views will occur only along short sections of Hoffnungsthal Road and Menzel Road. Long range views will be extremely limited due to existing vegetation and ridges to the east, south and west of the site.
- The development is set below the skyline and incorporates balanced cut and fill approach.
- Materials will comprise muted colours and low reflective finishes that complement the surrounding landscape;
- Extensive new planting is proposed.

The LVIA notes the development will have high visual notability from several adjacent properties. Given the scale of the hotel of some 150 rooms, it is to be expected there would be some localised visual notability.

The conclusions drawn in the LVIA are considered to be reasonable and reflect the unique siting of this proposal which has relatively limited viewshed impacts due to a position of adjacent ridgelines and which significantly preclude views and generally do not allow views beyond 2km radius.

Character Preservation Act 2012

The site is located within the Character Preservation District established under the Character Preservation Act 2012. Section 6 of the Act states that:

6 – Objects

(1) The objects of this Act are –

- (a) To recognise, protect and enhance the special character of the district while at the same time providing for the economic, social and physical well being of the community; and
- (b) To ensure that activities that are unacceptable in view of their adverse effects on the special character of the district are prevented from proceeding; and
- (c) To ensure that future development does not detract from the special character of the district; and
- (d) Otherwise to ensure the preservation of the special character of the district.

(2) A person or body involved in the administration of an Act must, in exercising powers and functions in relation to the district, have regard to and seek to further the objects of this Act.

7 – Character values of district

(1) The following character values of the district are recognised:

- (a) The rural and natural landscape and visual amenity of the district;
- (b) The heritage attributes of the district;
- (c) The built form of the townships as they relate to the district;
- (d) The viticultural, agricultural and associated industries of the district;
- (e) The scenic and tourism attributes of the district.

(2) The character values of the district are relevant to –

- (a) Assessing the special character of the district; and
- (b) The policies to be developed and applied by any state planning policy and the Planning and Design code under the Planning, Development and Infrastructure Act 2016 in relation to the district.

The Character Values include the rural and natural landscape and visual amenity of the district, the viticultural and associated industries of the district and the scenic and tourism attributes to the district. It is noted the GARP acknowledges tourism is a legislated element of the special character of the Barossa Character Preservation District. The Barossa is internationally recognised for the wine produced and continues to be valued for the authenticity of experience. The GARP further notes the combination of wine and food activities, historic townships, attractive rural landscapes, conservation parks and forest reserves that work together to attract visitors to the district.

The EIS states “The proponent seeks to embody the tangible and intangible values of the Barossa region through every layer of its design and delivery”. Further, the proposal seeks to respond to these tangible and intangible values through its siting and architectural expression, integrating built form into the rolling hills and preserving ephemeral creek lines. Materials embodied in the development comprise local stone for retaining walls, landscaping and footpaths, timber and earth-toned materials. Horizontal architectural language is proposed to settle the buildings into the land and approximately 10-11ha of vineyard will be retained, revitalised or replanted.

Bushfire Hazard

The site is located within a Hazards (Bushfire – High Risk) Overlay under the Planning and Design Code.

(08) 8563 8444 | barossa@barossa.sa.gov.au | barossa.sa.gov.au

43-51 Tanunda Road (PO Box 867), Nuriootpa SA 5355 | ABN: 47 749 871 215

The EIS is accompanied by a Bushfire Risk Assessment and Bushfire Emergency Management Plan, prepared by SA Bushfire Solutions. The Bushfire Risk Assessment recommends the site be closed on declared days of 'Catastrophic Fire Danger'. The EIS adopts this recommendation meaning guests would need to find alternative arrangements for accommodation on such days. The EIS provides no details on how this will be administered in practice.

An error is also contained in the Bushfire Risk Assessment. Figure 15 shows a map of a site located in the south-east (Naracoorte) which is not relevant to the development. The topography of the site is also described under Section 9.4 of the report as being "*flat and slightly undulating in places, with average slopes less than three (3) degrees (refer to Figure 15)*". It is unclear to what extent this error has been taken into account within the bushfire risk assessment.

Housing needs for workers

The EIS notes that during construction, the project will support over 460 full time equivalent jobs across traders, suppliers and professional services. For ongoing operations, it is forecast that the development will employ 150 people.

There is limited consideration within the EIS given to the current shortage of housing availability to cater for the workers during construction and ongoing operations. If workers accommodation is proposed on-site, further details regarding this aspect should be provided for assessment.

Transport services

The proposed development is expected to increase demand for local food, wine, transport and event services, thereby helping to strengthen the broader Barossa economy. Notwithstanding, the EIS is silent on public transport needs and current issues being experienced by visitors regarding lack of transport options and a lack of uptake on ride share platforms such as Uber.

Given the scale of the development, how is it anticipated that demand for transportation to and from the site will be serviced.

Traffic and Access

A Traffic and Access assessment has been prepared by traffic consultants, Cirqa. Early engagement with Council's Infrastructure & Environmental Services Directorate has taken place in relation to necessary upgrades that are required to the road network. These include:

- At the Lyndoch Valley Road and Hoffnungsthal Road intersection – channelised right turn intersection and auxiliary left turn treatment;
- Hoffnungsthal Road and Lindner Road intersection – shoulder widening and sealing for two-way movements;
- Hoffnungsthal Road – recommendation to reduce the speed limit to at least 80km/h;
- Sealing of Menzel Road.

The proposed road upgrade works are considered to be generally appropriate, subject to entering into an Infrastructure Agreement with Council. In addition, the following comments are identified:

- Potential conflict of visitor vehicles and commercial winery operation vehicles (up to articulated vehicles) is undesirable.
- Any tree removal to accommodate the driveway access and any road upgrade works is subject to separate approval of Council.
- The driveway access point to the hotel should be amended so that it is perpendicular to Menzel Road to minimise potential high speed ingress/egress vehicle movements.

- The proposal to reduce speed limits on Hoffnungsthal Road is subject to Department for Infrastructure and Transport approval.
- Measures should be in place to prevent vehicles larger than 11m rigid from accessing the loading dock.

Integration with Trails

The EIS is silent in respect to the opportunity to integrate the development with nearby trails, however, page 2 of the fact sheet released in relation to the consultation states *"Publicly accessible amenities, including a cellar door, restaurant, day spa and walking trails will invite both visitors and residents to engage with the site"*.

Given this, will the proposal integrate with walking trails on public/Council land, such as linkages to the Heysen Trail? If so, further consideration of this matter will be required and agreement with Council.

Environmental Health matters

In relation to the wastewater, the EIS highlights that the proposed wastewater system is subject to approval from SA Health. The following matters should be clarified in relation to the wastewater design:

- The watercourse runs through the position proposed for the ABSORBS bed. Being a lined bed, the 50m mandatory setback may not apply. SA Health should clarify this as part of their assessment.
- More detailed information in relation to the dimensions of the ABSORBS bed should be provided.
- A soil category should be confirmed in relation to the evapotranspiration of the ABSORBS bed.
- More detailed information is needed to enable calculation of the maximum secondary treatment ie. maximum hydraulic load and the maximum organic load for the ABSORBS.
- There are concerns in relation to the collection of wastewater in the storage dam together with trade wastewater. The wastewater irrigation area should be separated from the trade wastewater irrigation areas. The soil category for the wastewater irrigation areas also needs to be confirmed and there are restrictions on-site due to watercourses which do not appear to have been fully considered in the report.
- Council does not typically approve water balancing methods as they are not generally accepted in South Australia.

If approved, the wastewater system should be subject to a full assessment by SA Health and the Environment Protection Authority pursuant to the *SA Public Health Act 2011* and *Environment Protection Act 1993* and appropriate approval granted.

A food safety review will be necessary in relation to the proposed restaurants. Detailed layout of the restaurant areas will be required to ensure that these areas comply with Food Safety Standards under the *Food Act 2001*. In addition, the public pool and spa will need to be registered.

Conclusion

The proposal has garnered significant community interest and alternative viewpoints and that is acknowledged by Council. The Council believes there are challenges with the proposal scale and other matters raised in our submission and those of others in the community that require further review and analysis by advisors to the decision maker and to ensure alignment with the Objectives of the Character Preservation Act 2012.

Thank you again for the opportunity to provide comment in relation to the Southern Barossa Winery and Tourism Accommodation project.

Should you wish to discuss this matter further, please contact Aaron Curtis, Senior Manager – Development Services, acurtis@barossa.sa.gov.au or 8563 8492.

Yours faithfully

Mayor Bim Lange