ekistics

Southern Barossa Winery and Tourist Accommodation Project

Response Document

30 March 2026

REF# 01504-006

ACKNOWLEDGEMENT TO COUNTRY

Ekistics respectfully acknowledges the traditional owners and custodians of the land on which we work, and we pay our respects to Elders past and present.

PROPRIETARY INFORMATION STATEMENT

Revision	Description	Author	Date
Version 0	Response Document (Draft)	RT, JB & SJ	13 January 2026
Version 0	Response Document (Draft : Peer Review)	RT & RM	1 February 2026
Version 0	Response Document (Draft : Client Issue)	RT	3 February 2026
Version 1	Response Document (Final)	RT & SJ	5 February 2026
Version 2	Response Document (Final Post Agency Referrals)	RT	30 March 2026

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APPENDICES

1. EXECUTIVE SUMMARY

The Southern Barossa Winery and Tourist Accommodation Project (SBWTAP), proposed at Lot 110 Hoffnungsthal Road, Williamstown, comprises the establishment of a winery and cellar door, construction of a 5-star luxury resort hotel with conference and wellness facilities, as well as supporting infrastructure, car parking, landscaping, and site improvements. The application is being assessed as an Impact Assessed development under section 108(1)(c) of the *Planning, Development, and Infrastructure Act 2016*.

The project's Environmental Impact Statement (EIS) was released for public consultation from 5 November 2025 to 17 December 2025. During this period, 237 representations were received from the members of the public. In addition, a number of State Government agencies, as well as the Barossa Council, were referred to the proposal for comment.

Submissions raised queries and provided comments, both positive and negative, across a range of themes, including traffic and access, visual and landscape impacts, wastewater and stormwater management, economic and social impacts, investment opportunities, job creation, and flow-on tourism benefits for the region, amongst others.

This supplementary Document has been prepared as a response to the matters raised during the public and State Agency consultation period. It provides a summary of the issues and comments raised, alongside the proponent's responses, including:

- Clarifications and/or amendments on proposal;
- Additional technical information and supporting data; and
- Proposed refinements and commitments to mitigation measures.

Key commitments of the SBWTAP, as identified in the EIS, include:

- Preparation and implementation of a **Construction Environmental Management Plan (CEMP)** to manage construction-related impacts, including noise, dust, vibration, erosion and sediment control, contamination risk, resource use, emissions, and protection of vegetation and habitats.
- Preparation and implementation of a **Construction Management Plan (CMP)** addressing construction staging, hours of operation, workforce management, site logistics and coordination with environmental controls.
- Preparation and implementation of a **Traffic Management Plan (TMP)** to manage construction and operational traffic impacts and maintain safe and efficient access.
- Ongoing negotiations with Council and DIT with respect to required upgrades to existing transport infrastructure.
- Entry into an **Infrastructure Agreement/Deed** with Barossa Council and the Department of Infrastructure and Transport (DIT).
- Preparation and implementation of an **Operational Environmental Management Plan (OEMP)** incorporating odour management, operational lighting controls, waste management, and emergency response procedures.
- Detailed **Landscaping Plan** for the curated landscaping areas around the hotel and winery (incorporating recommendations of the fire hazard management plan).
- Preparation and implementation of a **Native Vegetation Management Plan**, including revegetation and rehabilitation of creek lines using indigenous species.
- Implementation of a **Weed Management and Rehabilitation Plan** as part of the OEMP to manage invasive species during construction and operation.
- Preparation and implementation of a **Bushfire Emergency Management Plan (BEMP)** and **Fire Hazard Management Plan (FHMP)** to address bushfire risk during construction and operation.

- Implementation of a **Sustainability Strategy** addressing energy efficiency, water efficiency, waste minimisation, and climate-responsive design.
- Delivery of a regionally significant tourism and hospitality development supporting long-term employment, skills development, and local procurement opportunities.
- Preparation and implementation of a **Wayfinding and Signage Strategy**.
- Finalisation of a **Materials Schedule** to ensure high-quality, contextually appropriate finishes consistent with landscape and character objectives.
- Ongoing collaboration with the **Kaurna Yerta Aboriginal Corporation (KYAC)** to safeguard cultural heritage, promote community participation and respect the site's cultural significance.
- Exploration of employment and training opportunities in collaboration with IHG, KYAC and other relevant stakeholders.

Following public consultation, the Proponent has committed to the preparation and implementation of additional management measures in response to submissions and agency feedback. These include:

- **Soil, Erosion and Drainage Management Plan**, to be implemented as part of the CEMP and CMP.
- **Noise Management Plan**, to be incorporated within the OEMP.
- **Wastewater Management Plan**, to be incorporated within the OEMP.
- **Bushfire Survival Plan (BSP)**, to be incorporated within the BEMP.

2. INTRODUCTION

This Response Document has been prepared on behalf of the proponent to address matters raised during the public consultation period for the **Southern Barossa Winery and Tourist Accommodation Project (SBWTAP).**

In accordance with statutory requirements, the EIS was released for a 30-business-day (6-week) public consultation period from 5 November 2025 to 17 December 2025, providing stakeholders, councils, state agencies, and members of the community with the opportunity to review and comment on the proposal.

This document systematically summarises and responds to the issues, questions and concerns raised in the representations received. Where relevant, it identifies clarifications, additional technical information, and proposed refinements or commitments to mitigation measures that further inform the assessment of the project's potential environmental, social, and economic impacts.

The purpose of this document is to demonstrate how the matters raised during consultation have been carefully considered and to assist the relevant assessment authority in its evaluation of the proposal.

The Impact Assessed pathway is summarised in *Figure 2-1*. The preparation of this Response Document represents the seventh stage of the statutory process.

Importantly, the responses provided should be read in conjunction with the EIS and its associated appendices, as well as the following new technical memos and letters summarised below.

Appendix 1 Acoustic - Response Letter : Sonus

Appendix 2 Traffic - Technical Memorandum : CIRQA

Appendix 3 Response Letter to ODASA : Baukultur

Appendix 4 Flora and Fauna Assessment - Response Letter : Succession Ecology

Appendix 5 Sustainability Strategy - Response Letter : Dsquared

Appendix 6 Wastewater - Technical Memorandum : Fluid Environmental

Appendix 7 Stormwater and Civil - Technical Memorandum : MLEI

Appendix 8 Bushfire - Technical Memorandum : SA Bushfire Solutions

Figure 2-1 : Impact Assessed Pathway process flowchart.

3. CONSULTATION AND REPRESENTATIONS SUMMARY

The early non-statutory engagement and formal statutory engagement were undertaken for the SBWTAP and delivered as part of the EIS process, as outlined in Section 8 of the EIS.

3.1. Early Non-Statutory Engagement

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), intending to provide a brief introduction to the project and gather feedback.

A community and stakeholder 'Open Day' information session was held at the Lyndoch Institute on Saturday, 28th June 2025. The Open Day provided the community with an early opportunity to discover more about the project, with several project team members present to directly answer questions, address concerns from the public, and talk through the current concept. The Open Day was well attended, with 40 attendees across the 3-hour session. The attendees were invited to populate their comments, concerns, and feedback onto post-it notes on a number of plans, images and posters made available for review. Project team members also recorded other comments during discussions on feedback forms, with all feedback collated and summarised as part of the Engagement Report, submitted as part of the EIS submission. Feedback received during this consultation event was not considered official representation, which can only be lodged during a formal consultation process organised by DHUD.

It is important to highlight that a large proportion of the submissions received during formal consultation largely reflected the same issues raised through the early engagement phase. The EIS preparation and its supporting documentation and technical studies were therefore largely informed by these issues. The public and agencies, therefore, provided submissions on an EIS that was prepared on the basis of their early feedback.

Figure 3-1 Photos from 28th June 2025 'Open Day' Drop-in Sessions

3.2. Formal Statutory Engagement

Public consultation on the EIS was undertaken between **5 November 2025 and 17 December 2025**, in accordance with statutory requirements. Stakeholders, Councils, State Government agencies, and members of the community were invited to provide submissions on the SBWTAP.

A total of **249 submissions** were received during the **30-business-day public consultation period**, comprising **12 government agency submissions** and **237 submissions from individuals, businesses, and community members**, all of which are addressed in this response document.

The 237 non-government submissions were received from a broad cross-section of stakeholders, including:

- Local Property Owners (20)
- Local Business Owners (19)
- Local Community Members (99)
- Interested Individuals (98)
- Others (1)

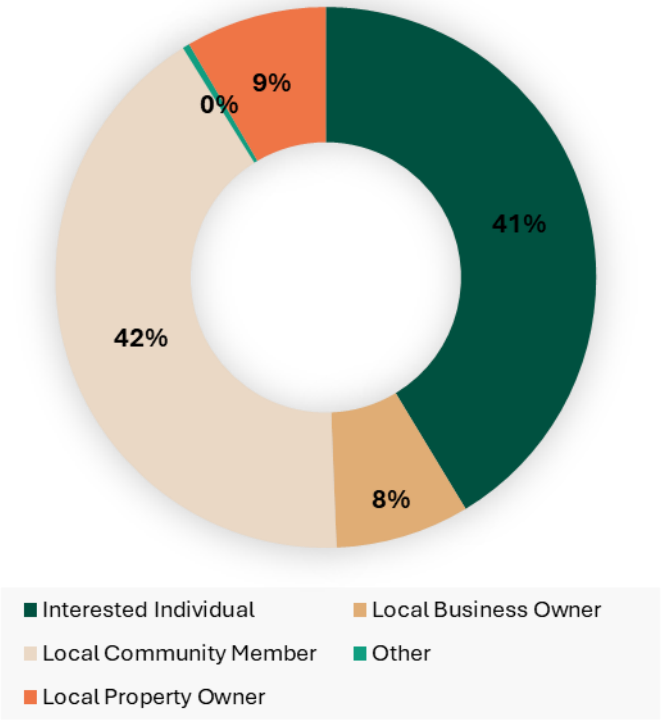

Figure 3-2 : Distribution of Submissions by Stakeholder Type.

The twelve (12) submissions received from government agencies were provided by:

- Aboriginal Affairs and Reconciliation (AAR)
- Department for Environment and Water (DEW)
- Department for Health and Wellbeing (DHW)
- Department for Infrastructure and Transport (DIT)
- Environment Protection Authority (EPA)
- Native Vegetation Council (NVC)
- Northern and Yorke Landscape Board (NYLB)
- Office for Design and Architecture South Australia (ODASA)
- Department of Primary Industries and Regions (PIRSA)
- South Australian Country Fire Service (CFS)
- South Australian Tourism Commission (SATC)
- The Barossa Council

Formal submissions were received via the following channels:

- Via Email
- Plan SA/ YourSay submission forms
- Hard copy and postal submissions

In addition to written submissions, **verbal and informal feedback** was provided by attendees at:

- An in-person drop-in session held on **27 November 2025** (16 attendees), and
- An online information session held on **3 December 2025** (8 attendees).

The submissions raised a wide range of issues, with key themes including:

- **Environmental matters**, including biodiversity, native vegetation, flora and fauna, bushfire risk, water management, visual and landscape impacts, and air and noise quality.
- **Social considerations**, including community wellbeing, public safety, emergency access, and impacts on local amenity.
- **Economic and regional planning matters**, including potential impacts on local businesses, employment, tourism, and housing availability, as well as consistency with Barossa Character Preservation objectives and State Planning Policy.

Some submissions provided detailed commentary across multiple topics, reflecting the interconnected nature of the issues raised. Others focused on a single issue, consistent with the specific interests or concerns of individual stakeholders. Of the 237 non-government submissions received, **more than 100 explicitly referenced or endorsed the 'Preserve and Protect Barossa' submission**, either through direct citation, attachment, or incorporation by reference.

3.2.1. The 'Preserve and Protect Barossa' submission

'Preserve and Protect Barossa' (PPB) submission raises a broad range of concerns regarding the SBWTAP, including its strategic justification, environmental performance, bushfire risk, social and economic impacts, and consistency with statutory planning frameworks. It questions the adequacy of the project's demand justification, including the absence of publicly available supporting data, reliance on confidential reporting, and the use of outdated regional strategies that do not account for recently approved accommodation projects in the Barossa. The PPB submission also raises uncertainty regarding the winery component, including the absence of an identified operator and the conditional staging of key elements, which it argues undermines the project's characterisation as an integrated wine tourism development.

This submission raised concerns about the perceived deficiencies in baseline environmental information relating to flora, fauna, water, air, noise, and lighting, noting a reliance on modelling and limited survey data, which may affect the reliability of impact assessments and mitigation measures. Bushfire risk is highlighted as a significant issue, with concerns raised regarding site topography, the accuracy of supporting data, and reliance on a single constrained access road for evacuation and emergency response.

The PPB submission further asserts that the proposal is inconsistent with the Character Preservation Act, the Significant Landscape Protection overlay and the Planning and Design Code, characterising the development as an urban-scale resort within a protected rural landscape and raising potential implications for the Barossa's World Heritage nomination. Additional matters raised include the adequacy of community and Traditional Owner consultation, potential economic leakage from nearby townships, workforce and housing pressures, transport and traffic impacts, wastewater and stormwater management, groundwater protection, and the adequacy of noise and lighting controls to protect local amenity and landscape character.

4. RESPONSE TO SUBMISSIONS

The Proponent acknowledges the submissions received from the community and feedback from the Barossa Council and State Agencies.

For the purposes of minimising confusion and facilitating ease of cross-referencing with the EIS, submissions, agency responses, and council comments have been addressed under relevant assessment headings. Where multiple submissions raised similar or overlapping matters, these have been grouped and addressed collectively to avoid repetition. All individual submissions and agency comments have been considered in full, and where relevant, specific matters unique to particular respondents have been addressed separately.

4.1. Amenity and Environmental Quality

4.1.1. Noise

The noise impacts were previously assessed in Section 10.1.2 of the EIS, supported by the Environmental Noise Assessment report (EIS - Appendix 9) prepared by Sonus Acoustic Engineers. In response to the submissions received, an additional technical memorandum addressing the matters raised has been prepared by Sonus and is provided in ***Appendix 1***.

Enforceable noise limits are anticipated to be added as a condition of consent should the proposal obtain development approval. The relevant noise limits are as follows:

- For music noise, limit the level of music played in various areas to the following:
  - Within the ballroom of the hotel, 98 dB(A) (105 dB(C));
  - Outside of the hotel or winery, a level of 73 dB(A) (81 dB(C)) at 3m from a performer;
  - Within the function space of the winery with the doors open, a level of 79 dB(A) (87 dB(C));
  - Within the function space of the winery with the doors closed, a level of 100 dB(A) (108 dB(C));
- For all other noise sources (i.e. mechanical plant, patrons, car parking, and vehicle movements):
  - An average goal noise level of 52 dB(A) during the day (7:00am to 10:00pm);
  - An average goal noise level of 45 dB(A) during the night (10:00pm to 7:00am);
  - The above average goal noise levels would be measured and assessed in accordance with the *Environment Protection (Commercial and Industrial Noise) Policy 2023*.

It should be noted that efforts have and will continue to be made in subsequent design development to minimise the noise generated by the proposal, as guests and visitors of the hotel and winery would also be impacted by any unreasonable noise generated from within the site. The ‘self-interest’ need of the operators to manage noise levels will also ensure acceptable noise levels at surrounding residential locations.

It is anticipated that, should approval be granted, a Noise Management Plan would be prepared as part of the Operational Environmental Management Plan (OEMP), particularly targeting noise generated by functions and events.

With respect to concerns on the perceived cumulative noise exposure from helicopter operations, the applicant wishes to confirm that there is no intent to construct a helipad or provide helicopter services to guests of the hotel from the site itself. As such, there will be no cumulative noise exposure from helicopter operations. The only helicopters operating in the locality are owned by Barossa Helicopters, and whether the proposed development ultimately results in increased activity for this existing nearby

business is out of the scope of this assessment. When considering the cumulative noise impacts from the hotel and winery, the Acoustic Assessment concluded that ambient noise levels measured at the site are low enough not result in unreasonable cumulative noise impact for the nearby noise-sensitive receivers.

4.1.2. Transport and Traffic

A number of public submissions raised concerns regarding the potential traffic and transport impacts of the SBWTAP, particularly in relation to increased vehicle movements, road network capacity, safety, and site accessibility during both the construction and operational phases.

These matters were previously assessed in Section 10.1.3 of the EIS, supported by the Traffic and Access Impact Assessment (TAIA) prepared by CIRQA Pty Ltd (EIS - Appendix 10). The TAIA examined existing traffic conditions, proposed access arrangements, forecast construction and operational traffic generation, road safety considerations, and the capacity of the surrounding road network to accommodate the development. The assessment also identified transport infrastructure upgrades to mitigate potential impacts and ensure the safe and efficient operation of the project.

Some submissions also acknowledged potential positive aspects of the project in relation to traffic and transport. These included recognition that the proposed development, in conjunction with the identified infrastructure upgrades, could improve site accessibility, formalise visitor access routes, and enhance safety and traffic flow during peak periods and events.

In response to the submissions received, a technical memorandum addressing the matters raised has been prepared by CIRQA and is provided in ***Appendix 2***. The key matters raised in submissions, and the Proponent's responses, are addressed below.

Construction Traffic and Vehicle Movements

Submissions raised concerns regarding construction traffic volumes, heavy vehicle movements, road safety, and potential disruption to local roads.

As outlined in Section 10.1.3.2 of the EIS, detailed construction traffic and logistics arrangements would be finalised following the appointment of a construction contractor and documented within a Construction Environmental Management Plan (CEMP), to be prepared prior to the commencement of construction.

The CEMP will be prepared in consultation with relevant statutory authorities and will include:

- nomination of approved haulage routes utilising appropriate arterial and collector roads
- measures to minimise the use of constrained local roads
- scheduling and management of heavy vehicle movements
- temporary traffic control arrangements, signage, and speed management where required
- safety controls to protect other road users, pedestrians, and cyclists
- procedures for managing complaints and responding to unforeseen traffic issues.

These measures will ensure that construction traffic impacts are appropriately managed and minimised for the duration of the works.

Operational Traffic Impacts and Network Capacity

Concerns were raised regarding the ability of the surrounding road network to accommodate traffic generated by the completed development.

The TAIA confirms that the immediate and broader road network has the capacity to accommodate the forecast operational traffic volumes associated with the development, subject to the implementation of identified infrastructure upgrades. The assessment considered weekday and weekend peak periods, event-related demand, and seasonal variations associated with the proposed

land uses. With the proposed mitigation measures in place, the development is not expected to result in unacceptable levels of congestion, deterioration in levels of service, or adverse road safety outcomes. The assessment also confirms negligible impact on adjacent businesses and local roads, including Barossa Helicopters, Lavender Farm, and Tweedies Gully Road.

Transport Infrastructure Upgrades

Section 10.1.3.6 of the EIS outlines the transport infrastructure upgrades identified in the TAIA as necessary to support the development and mitigate traffic impacts.

Where required, upgrades to public road infrastructure will be undertaken at the Proponent's cost and in consultation with, and subject to the approval of, the Barossa Council and the Department for Infrastructure and Transport (DIT). This approach ensures that development-related traffic impacts are appropriately addressed and that the local and regional road network continues to operate safely and efficiently.

On-site Car Parking Provision

Concerns were raised regarding the adequacy of on-site parking and the potential for overflow parking on surrounding roads. As detailed in Section 10.1.3.5 of the EIS, the development will provide a total of 334 formalised on-site car parking spaces, comprising:

- 115 spaces for the winery component, including two accessible spaces and two dedicated bus bays; and
- 219 spaces for the hotel component.

While standard land use rates under the Planning and Design Code would indicate a higher theoretical parking requirement, a reduced provision has been proposed based on a detailed demand-based assessment. This assessment considers shared patronage between uses, staggered peak demand periods, the use of tour buses and shuttle services, and comparable data from similar developments.

The proposed provision reflects actual parking demand and ensures that peak periods can be accommodated on-site without reliance on informal or on-street parking.

Accessibility and Transport Services

Submissions raised concerns regarding the availability of practical transport options for guests, including the suggestion for a 24-hour dedicated chauffeur service. The Proponent advises that IHG will enter into a contractual relationship with a designated chauffeur service attached to the hotel to provide guest transport services, including airport transfers and private chauffeur services. These services can be booked online or via the IHG guest App.

More broadly, regional accessibility to the site is addressed in Section 5.3.3 of the EIS, which details existing road connections and the availability of public transport, rideshare services, coach services, and interstate transport links servicing the wider area.

The Proponent acknowledges that public transport in the Barossa is limited in frequency and coverage, and that rideshare uptake in rural areas is currently variable. Guests and staff are therefore expected to rely primarily on private vehicles, car-pool arrangements, private coach services/arrangements, or the hotel's concierge-coordinated transport. While public transport and rideshare access are limited, the assessment assumes these conditions will continue, and does not rely on future improvements; private tours and hotel-coordinated transfers are available to ensure adequate transport options for visitors. Wider expansion of public transport services, new bus routes, or regional network upgrades, while a positive result for the proposal, are outside the scope of the development, and the proposal is not reliant on future network improvements and/or expansions.

External Pedestrian and Cyclist Trail Linkages

Several submissions raised matters relating to pedestrian and cyclist trail connections beyond the site.

The provision of external trail linkages is not proposed as part of the project, as it falls outside the development footprint and land ownership. Priority has been given to internal pedestrian and vehicle circulation, designed to ensure safe access for all users within the site. That said, where opportunities exist to connect to external networks, the proponent has no objection to these being highlighted and promoted to guests and visitors.

Safety and Emergency Management

Operational safety, including emergency access and evacuation, will be addressed through the project's suite of management plans, including:

- the Emergency Response Plan (ERP) contained within the Operational Environmental Management Plan (OEMP)
- the Bushfire Emergency Management Plan (BEMP)
- the Fire Hazard Management Plan (FHMP).

These plans establish procedures for emergency vehicle access, evacuation routes, traffic control during emergency events, and coordination with emergency services. Together, they ensure that both construction and operational transport risks are appropriately managed.

Matters Outside the Scope of the Project

Several submissions raised matters that extend beyond the scope of the SBWTAP and its direct traffic impacts, including:

- the use of unsuitable local roads (such as Tweedies Gully Road) by GPS navigation systems;
- broader regional intersection road upgrades that are beyond the project are identified as impacted;
- the extension of public transport services, including new or expanded bus routes and rail services.

These matters relate to regional transport planning, navigation software algorithms, and long-term infrastructure provision, which fall under the responsibility of relevant government authorities rather than individual development proponents. While the Proponent will implement all reasonable mitigation measures associated with traffic generated by the project, it is not feasible or appropriate for the development to fund or deliver broader regional transport infrastructure or public transport network expansions unrelated to its specific impacts.

4.1.2.1. The Barossa Council

The Barossa Council raised a number of comments relating to transport accessibility, vehicle conflict, access design, and servicing arrangements associated with the proposed development. These matters have been considered and addressed in the CIRQA technical memorandum.

Notwithstanding the raised matters, the Council has raised no concerns with the general traffic impact assessment or its conclusions. In particular, Council accepted that the traffic generated by the development, including both light and heavy vehicles, can be appropriately accommodated within the capacity of the local road network.

4.1.2.2. Department for Infrastructure and Transport

The Department for Infrastructure and Transport (DIT) provided comments relating to external road works, junction treatments, and compliance with Austroads standards. These matters have been considered and addressed in the CIRQA technical memorandum.

Apart from the matters raised, DIT has raised no concerns with the overall traffic impact assessment or its conclusions. In particular, DIT acknowledges that traffic generated by the development, including both light and heavy vehicles, can be accommodated safely and efficiently on the arterial road network.

4.1.3. Visual Amenity, Design and Character Preservation

4.1.3.1.Public Submissions:

A number of the public submissions provided feedback on matters related to architectural design, scale and mass, visual impacts, and the alignment of the built form with the values of the Barossa Character Preservation District (and associated legislation). The level of interest in the design approach is understandable, given that the development is intended as a notable destination venue, and the introduction of the hotel building in particular will be apparent in the locality.

4.1.3.2.Development Outside of a Township

A key issue raised related to the selected site location of the development, which being outside, rather than within, an existing urban area or township. As explained in the EIS, this location is, in part, why the project is undergoing the more robust 'impact assessed' planning assessment pathway available.

In response to this query, we highlight that a fundamental aspect of this project's success lies in the resort facility being a 'destination,' not just a place to stay overnight. The unique offering for guests is intended as a holistic and immersive 'Barossa' experience. As such, the project's success depends on the ability to **offer an experience that cannot be replicated in or near an existing built-up area**, town, or city. The secluded, tranquil, and exclusive locality attributes provide a number of interrelated strategic, environmental, cultural, and experiential advantages which distinguish these exclusive tourism destinations from their city or town-based tourism counterparts.

The site's value lies in its unique landscape - rolling hills, vineyards, mature trees, scenic views, wildlife, and a distinct Australian character that appeals especially to international visitors. These qualities cannot be replicated in township settings, particularly on more constrained land holdings within Township Zones.

The siting of the development on a generous piece of land, well set back from neighbours, allows for the retention of mature vegetation, substantial revegetation and creek restoration, immersion within vineyards, extensive rainwater harvesting, and extensive tree planting. Much of this would not be feasible on a site within, for example, Tanunda, Lyndoch, or other local Barossa townships.

There are many benefits to siting these types of tourism facilities outside of townships, for example, large hotel facilities within a township can add significant localised tourism pressure to regional towns, including streetscape impacts, heritage challenges, traffic, and service demands. Locations where the activities can be highly controlled, contained, and curated are preferred, and sites outside of townships provide these opportunities. Furthermore, these remote facilities attract visitors seeking unique, place-based experiences, which help diversify these regional economies, whereas in established townships, which are already economically active, this catalytic effect is diminished.

Lastly, we note that the 'Preserve and Protect' submission argued that hotels of this calibre in premium wine regions are usually located within a township and not within the rural landscape. Examples to the contrary can be observed in:

- Marqués de Riscal, Spain;
- Mont Rochelle, South Africa;
- Awasi Mendoza, Argentina;
- Rosewood Castiglion del Bosco, Italy;
- Les Sources de Caudalie, France.

Luxury hotels located in scenic locations are not uncommon occurrences and represent a potential yet untapped resource in the Barossa.

4.1.3.3.Suitability of Architectural Design

The diverse range of views regarding the suitability of the architectural design is acknowledged, including both positive comments and those who have concerns regarding the form and scale of the building.

Many submissions were complimentary of the design and the low, linear form adopted, as contrasted by other more visually prominent hotels approved in the region in recent years. The design intent to 'hide' rather than 'trumpet' the location of the hotel was appreciated by many.

Notable concerns about the apparent scale and mass of the building are also raised in many submissions. The adopted design approach has been comprehensively addressed in the EIS and associated architectural documentation. This matter is further addressed in the sections below.

The 'Preserve and Protect' submission raises a number of matters, but at its core, the submission suggests that the scale of the proposal is fundamentally inconsistent with the Character Preservation District and Significant Landscape Protection Overlay, and states that large hotel accommodation should only be built in townships/tourism zones, not rural areas.

Options on architecture are almost always diverse and subjective. We note the Preserve and Protect submission suggests, amongst other statements, that the project:

- *…falls well short of the landscape-led, Barossa-responsive design quality that would be needed to justify such a large built form;*
- *…risks the very character, safety, and long-term opportunities that make the Barossa special; and*
- *…is fundamentally inconsistent with the objects of the Character Preservation (Barossa Valley) Act 2012 and the Character Preservation District (CPD) provisions.*

Respectfully, we disagree with these statements, and while varying opinions regarding the design are acknowledged, the design team, proponent and hotel operator have formed the view that the design approach adopted is sound and highly responsive to the site and local character. Substantial design evolution and refinement have occurred over a number of years, taking account of key stakeholder requirements as well as early public engagement and ODASA feedback, culminating in the proposal as lodged. Of note was the previous height amendment, which resulted in a significant reduction in scale of the eastern building wing by over 3 metres. On this basis, no further changes to the architectural design of the project are proposed.

4.1.3.4.Visual Impact and Character Preservation

The Project Team stand by the findings of the comprehensive Visual Impact Analysis undertaken, which, in our view, clearly demonstrates that, overall, the visual impact of the project is negligible for all but a few immediate properties. This is a result of the clever siting and placement of the building on the site, within a natural valley below ridgelines.

Importantly, we reiterate and acknowledge that:

- While the potential visual effect resulting from the proposed development will have degrees of visual change in the immediate locality, it will not have any notable visual impact more broadly across the wider landscape of the area, during the day or night.
- In the immediate locality, the impact is confined to the valley and predominantly from public roads and immediately neighbouring properties.

- The development is not visible from Lyndoch Valley Road or properties to the west due to distance, terrain, and vegetation.
- The hotel is partially visible halfway along Hoffnungsthal Road heading east, hidden at the Hoffnungsthal/Menzel intersection, and only becomes visible farther east, especially from 183 Hoffnungsthal Road.
- Although the winery is visible from the Lavender Farm's western edge, proposed plantings will largely screen it.
- As you head south on Menzel Road, the hotel becomes more noticeable until it disappears again near the southwest corner of the site, hidden behind the southern ridgeline.
- Visibility of the rear of the hotel from 117 Menzel Road is highly apparent (from their surrounding paddocks rather than from their home). However, its low profile, position below the ridge, natural materials, and boundary vegetation help reduce the hotel's visual impact compared to the previous design.

While the area's rolling hills create a feeling of openness, the ridgelines, valleys, vines, and vegetation keep the site visually enclosed except from higher points to the south. The sensitive approach to siting, separation, and scale ensures the hotel building will remain below the surrounding ridgelines and minimally visible. The compact, low-set building form results in a **site coverage of only 5%,** highlighting the efficiency of the buildings and the compatibility of the building size in the context of this location.

In this context, it is critically important to note that the Character Preservation (Barossa Valley) Act 2012 and the associated Character Preservation District Overlay do not prohibit the building of tourism development. The intent of these protections is not to restrict all development but rather to ensure that new development appropriately responds to the character values while also balancing the economic, physical, and social well-being of the community. In fact, the **Character Preservation legislation and associated planning policy support investment in the economic base of the district by enabling a range of tourism-related activities which will enhance and reinforce the quality and diversity of the landscape and experiences available to visitors.** SBWTAP directly supports this goal, while, in our view, also appropriately respecting and protecting the visual amenity and natural beauty derived from the expansive rural views, the undeveloped backdrop of the Barossa Range and escarpment, remnant native vegetation, large River Red Gums, open space, rolling hills and watercourses.

Similarly, the proposal responds to the objectives of the Code's Significant Landscape Protection Overlay, recognising the high value of the landscapes and views associated with the site and its surroundings. The natural environment is the key major attraction of the site and a critical element of delivering an authentic Barossa experience.

4.1.3.5.The Geber Decision

Submissions referring to *Geber Super Pty Ltd v Barossa Assessment Panel [2023] SASC 154* and raising concerns regarding consistency with the Planning and Design Code, overlays and rural character are noted.

The Geber decision concerned a different proposal, site, and assessment process, and turned on the specific Rural Zone policies and deficiencies in the Panel's consideration of those matters. It does not establish a general prohibition on tourism development in rural areas nor require refusal of impact-assessed development.

The current application is impact assessed and determined by the Minister. Under sections 95 and 115 of the Planning, Development and Infrastructure Act 2016, the Minister must consider the EIS, the Planning and Design Code, relevant overlays, State and Regional planning policies, and the environmental, social, and economic impacts of the proposal as part of a broader merits-based assessment.

Concerns regarding land use compatibility, rural character, primary production, zoning intent, and policy compliance are addressed through the EIS and the Assessment Report and will be considered as part of the Minister's statutory determination.

Accordingly, while the submissions are acknowledged, the Geber decision is not determinative of the outcome of this application, which must be assessed on its own merits under the current legislative framework.

4.1.3.6. The Barossa Council

Barossa Council provided a considered response which recognises the challenges as well as the significant opportunities presented by the project. From a design perspective, Council noted that "*The scale, siting and design of the hotel is one of the most challenging aspects of the proposed development*." The proponent concurs, which is why the design process was so extensive and thorough. Not only must the design respond to its site and local context, but also be a viable design configuration that can function effectively for its intended tourism accommodation use.

Council's informed comments on the design aspects of the project are welcomed, as was their attendance at the Design Review sessions. We also appreciate Council's feedback on the visual impact, where they noted that "*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 a 2km radius*."

We note Council's comments regarding the Character Preservation Act 2012 and refer to the previous commentary provided on this topic (Section 4.1.3.4. Visual Impact and Character Preservation above), noting that Council appear generally comfortable with how the project responds to its Character Preservation legislative obligations.

We note Council's desire for a review of the siting and prominence of infrastructure associated with the winery, such as fire tanks, rainwater tanks and so on, and while the location of key services is essentially dictated by Authorities, the proponent has no objection to a review of the location and/or ability for additional screening, which could be undertaken as part of detailed design phase should be project be approved.

4.1.3.7. Office for Design and Architecture South Australia

ODASA provided a detailed submission on the project, which followed the proponent's participation in two (2) Design Review Sessions prior to lodgement. Following these Design Review sessions, design refinements were made in response to the feedback and suggestions made. The most notable of these was the reduction in height of the eastern building wing by over three (3) metres.

On review of the ODASA referral comments, the architects, Baukultur, have prepared a detailed response to the comments (refer to ***Appendix 3***).

In our view, the adoption of many of the key ODASA comments would necessitate fundamental design changes to the scheme, which are not feasible for the hotel product sought, nor acceptable to the operator. We reaffirm that the proposed linear, horizontal form (much of which is nestled into the hillside), the building's internal and external composition and the architectural expression and materiality have evolved through careful design testing, as well as a practical understanding of the operational requirements of a large hotel.

While a more terraced design form was tested early on, this resulted in an enlarged building footprint, more land disturbance, operational inefficiencies, and, in the view of the design team, a diluted architectural clarity. A simplified, compact building form preserves space for vineyards and land for landscaping, shortens guest and housekeeping travel through the building, better aligns structure, and services and simplifies the bushfire strategy with centralised emergency management.

While we respect the feedback provided by ODASA and have benefited from the guidance provided through the pre-lodgement Design review sessions, after careful deliberation, the project team has resolved not to make any further amendments to the hotel architecture.

4.2. Biological Environment

4.2.1. Biosecurity

The development recognises the sensitivity of the Southern Barossa's viticulture, the phylloxera-free status of the region, and the importance of protecting surrounding vineyards and the broader agricultural economy. The biosecurity risks associated with the SBWTAP were previously covered in Section 10.2.1 of the EIS, supported by the Preliminary Flora and Fauna Assessment prepared by Succession Ecology (EIS - Appendix 12), and the Landscape Package and Proposed Flora Species List prepared by Landskap (EIS - Appendix 13).

Submissions raised concerns regarding the potential biosecurity risks associated with the SBWTAP, particularly in relation to:

- **Phylloxera and pest risk :** The introduction of a large, high-turnover hotel, events, and winery in the middle of productive vineyards could increase the likelihood of pests or pathogens entering the phylloxera-free region, threatening surrounding viticulture and the Barossa's long-term reputation.
- **Visitor hygiene and compliance**: Standard vineyard hygiene measures are designed for trained staff and may not be sufficient for large numbers of transient visitors or international guests. Concerns were raised that visitors may disregard signage and hygiene protocols, increasing the risk of vineyard-level biosecurity failure.
- **Operational risk from tourism focus :** Submissions questioned whether the specific tourism and events focus, and the rural location, could be managed to reduce phylloxera and pest risks to an acceptable or negligible level.
- **Protection of viticulture and regional reputation :** The Barossa's globally significant old and exceptional vines are irreplaceable assets. Submissions emphasised the need to safeguard surrounding viticulture operations from trespass, operational conflicts (e.g., spraying, dust, noise, odour), and pest incursion.

The SBWTAP has comprehensively addressed biosecurity risks through the EIS, with risks managed via an integrated framework of site design, operational controls, and ongoing monitoring. The mitigation framework applies uniformly to all contractors, equipment, vineyard inputs, and visitor-related activities.

Biosecurity mitigation measures outlined in the EIS, and to be implemented through detailed operational protocols, include the development of formal biosecurity policies and procedures to manage risks to the productivity and profitability of viticulture within the region. These measures include, but are not limited to, the following:

- **Vineyard Inputs:** All planting stock and vineyard inputs will be sourced from accredited nurseries and certified suppliers.
- **Access and Visitor Management:** Vineyard areas will be protected through fencing, controlled access points, and strategically placed multilingual signage. Dedicated sealed parking areas are provided for visitor vehicles, separated from vine rows. Designated viewing platforms and "Photo Zones" are incorporated to enable vineyard appreciation without physical access to operational areas. A vineyard visitor log will be maintained to record access and support traceability. These measures are specifically designed to physically separate visitors from vine rows, reducing reliance on visitor awareness or individual compliance.
- **Sanitation:** Footwear, vehicle, and equipment hygiene protocols will apply to all vineyard workers, contractors, machinery entering vine rows, and visitor tours. Multiple fixed and mobile sanitisation stations will be provided across the site.

- **Monitoring and Response:** Ongoing monitoring will include the use of Phylloxera traps, periodic root inspections, and monitoring of harvested grapes and waste products to prevent pest or pathogen transfer. A Phylloxera management zone register will be maintained to support monitoring and traceability. Annual Phylloxera risk assessments will be undertaken in accordance with Vinehealth Australia standards, supported by a formal incident response protocol for any suspected incursion.
- **Training and Visitor Engagement:** Vineyard and winery staff will be trained in pest identification, hygiene, and reporting procedures. The project will work with hotel representatives to educate visitors on biosecurity requirements and encourage compliance.
- **Integration with Site Design:** As highlighted in the Baukultur design principles, vineyard showcasing is a central design element. All design and operational measures are carefully integrated to allow safe and immersive visitor engagement while maintaining biosecurity and protecting vineyard productivity.

Through this combination of design-led controls, operational procedures, and monitoring, SBWTAP ensures that biosecurity risks associated with tourism, events, and vineyard operations are mitigated to a level considered acceptable and negligible. These measures protect the phylloxera-free status of the region, safeguard surrounding vineyards and viticulture industries, and maintain the long-term economic viability and reputation of the Barossa Valley as a premium wine-producing region.

4.2.1.1. Department of Primary Industries and Regions

The SBWTAP has comprehensively addressed biosecurity risks associated with replanting and establishing approximately 11 hectares of vineyard through the measures outlined in the EIS and further detailed in the above section. These include sourcing all planting stock and vineyard inputs from accredited nurseries and certified suppliers, implementing strict sanitation protocols for all contractors, machinery, and equipment, and maintaining ongoing monitoring and incident response procedures, including Phylloxera traps, periodic root inspections, and a Phylloxera management zone register.

In line with PIRSA's preference, the project is committed to prioritising the use of South Australian suppliers and contractors wherever practicable. This approach not only supports the local economy but also ensures all vineyard inputs and operations originate from a region recognised as free of grape phylloxera and other exotic plant pathogens. Contractor management protocols will include verification of prior work locations and compliance with biosecurity hygiene standards to minimise risk from interstate operations.

Overall, the integrated framework of sourcing, operational controls, and monitoring provides robust measures to mitigate biosecurity risks to vineyard productivity and regional viticulture.

4.2.2. Flora and Fauna

A few public submissions raised concern regarding the potential impacts of the project on biodiversity values, including the adequacy of ecological surveys, potential effects on threatened flora and fauna, and the loss of native vegetation.

These matters were previously assessed in Section 10.2.2 of the EIS, supported by the Preliminary Flora and Fauna Assessment Report (PFFAR) and EPBC Act Self-assessment prepared by Succession Ecology (July 2025) (EIS - Appendix 12).

In response to the submissions received, an additional technical memorandum addressing the matters raised has been prepared by Succession Ecology and is provided in ***Appendix 4***.

The key matters raised in submissions, and the Proponent's responses, are addressed below.

Biodiversity Values and Survey Methodology

In response to a public submission questioning the single-day field survey (19 November 2024) and the absence of targeted threatened species surveys, Succession Ecology provided a detailed memo clarifying the assessment methodology. The memo notes that a desktop assessment, combined with the field survey, provided sufficient information to identify ecological constraints and opportunities across the 21.5-hectare project area. This included reviewing relevant State and Federal databases, previous reporting, remote sensing imagery, and site vegetation mapping. While some trees of high ecological value, particularly large River Red Gums along the watercourse, were identified, the proposed development footprint avoids impacts to these trees.

The EPBC Act Self-assessment concluded that the project is unlikely to result in significant impacts to any Matters of National Environmental Significance (MNES), including the Grey-headed Flying-fox (Pteropus poliocephalus), which was the only species deemed potentially affected. The assessment determined that there is no real chance of a significant impact on this species, and no nationally important GHFF camps will be affected. Similarly, none of the 35 threatened flora species were considered likely to occur in or be impacted by the development footprint. Although the timing of the field survey limited the detection of threatened orchid species, the desktop assessment confirmed that the site's agricultural landscape is unlikely to support these species. Overall, the PFFAR found the project area suitable for development, noting opportunities to enhance biodiversity through the control of invasive weeds and the promotion of native vegetation.

Native Vegetation and Landscaping

The Proponent confirms that native vegetation clearance is not proposed, as outlined in Section 10.2.2.4 of the EIS. While minor clearance of vegetation may be required to install service infrastructure and utility connections (i.e., grasses or low shrubs), this will be minimised and subject to micro-siting assessment when final service plans are known and approved.

The creek line will be rehabilitated through the removal of pest species, planting of native vegetation, and implementation of erosion management measures. Additional native plantings along the creek line and pathways throughout the site will further enhance these rehabilitation initiatives. Proposed landscaping will feature native and drought-tolerant species. An indicative tree planting palette has been provided in Section 10.8.3.2 of the EIS, indicating the style and mix of vegetation suitable across different areas of the site. Final species selection will be determined through a detailed landscaping plan, which will address design, planting depth, layout, and irrigation requirements for each landscaped area. This plan will be developed in collaboration with architects, service engineers, and specialist lighting engineers to ensure integration with the overall site design.

4.2.2.1. Native Vegetation Council

The Native Vegetation Council (NVC) provided comments regarding the identification, protection, and future management of native vegetation associated with the project. This included consideration of remnant and regenerating vegetation within the site, vegetation within riparian areas and road reserves, and the proposed approach to landscaping and revegetation.

Apart from the matters raised, the NVC has raised no concerns with the overall approach to native vegetation management. In particular, the NVC acknowledges that the EIS appropriately applies the mitigation hierarchy, prioritises the avoidance of remnant vegetation, and proposes landscaping and plantings that support biodiversity and ecological resilience.

The proponent notes and will continue to implement the NVC's recommendations, including avoiding the clearance of remnant River Red Gums with hollows, protecting native roadside and riparian vegetation through buffers where practicable, and prioritising native species in garden design to enhance biodiversity, habitat, and climate resilience. These matters have been addressed in the EIS through the application of the mitigation hierarchy and the inclusion of the Proposed Flora Species List prepared by Landskap (EIS - Appendix 13). The flora species list identifies a combination of ornamental and native species and is

indicative only, with final species selection to be confirmed during the detailed design phase to ensure alignment with ecological objectives and statutory requirements.

All future works will comply with the *Native Vegetation Act 1991* and relevant guidelines. The proponent remains committed to managing native vegetation in a manner that supports ecological values and biodiversity outcomes.

4.2.2.2. Department for Environment and Water

The Department for Environment and Water (DEW) provided comments confirming that the EIS adequately meets the relevant Assessment Requirements, enabling the identification of potential impacts, mitigation and management measures, and compliance with recognised, agreed, or legislated standards and guidelines. DEW notes that recommendations set out in the EPBC Act Self-Assessment and the Preliminary Flora and Fauna Assessment (EIS - Appendix 12) have been carried through to the EIS.

DEW notes that no significant impacts to listed species or ecosystems are anticipated, and advises that the retention of existing habitat, targeted weed management, and revegetation with native plants may result in a net environmental benefit. In particular, DEW considers that the proposed mitigation and management measures are sufficient to avoid any significant risk to flora and fauna from minor potential impacts associated with construction-related noise, water use, fire, waste, and pest management.

4.2.2.3.Northern and Yorke Landscape Board

The Northern and Yorke Landscape Board (NYLB) notes that no clearance of native vegetation is proposed. The Board is satisfied that the proposed works are located within exotic-dominated pasture and that the ecological impacts are not significant. As such, no further comment is required from the Board in relation to ecological impacts.

NYLB supports the proposed mitigation measures, including the preparation and implementation of a Weed Management Plan.

The Proponent acknowledges the requirements of the *Landscape Act 2019* in relation to the management and transport of declared pest plant material and confirms that, should removal and off-site transport of declared species be required, early engagement will be undertaken with the Northern and Yorke Landscape Board and any necessary permits, including PIRSA approvals, will be obtained prior to works proceeding.

4.3. Climate Change and Resource Efficiency

4.3.1. Climate Change Adaptation

The Sustainability Strategy Report included in the EIS submission describes the project's holistic approach to sustainability and initiatives to reduce its environmental impact, including a reduction in operational energy required, greenhouse gas emissions, water use, and waste. Appendix A of the Sustainability Strategy Report details the project's climate adaptation principles, along with the detailed risk assessment that was conducted and the resultant mitigation measures that have been included in the project to improve its resilience to future climate change. The project's response is in line with the best practice climate change resilience design response.

In addition, an additional technical memorandum addressing the matters raised has been prepared by DSquared, provided in ***Appendix 5***.

4.3.1.1.Department for Environment and Water

Following comments from the Department, the Proponent has confirmed that battery energy storage will be integrated into the proposal during Detailed Design.

4.3.1.2.Native Vegetation Council

The landscaping schedule for the proposal includes a careful selection of native plant species that are better adapted to a hotter climate and will minimise the need for irrigation.

4.3.2. Greenhouse Gas Emissions

4.3.2.1. Department for Environment and Water

Considerations of embodied carbon were not included within the EIS Assessment Criteria, despite inputs from the Department. Consequently, these matters are out of the scope of this assessment. Development of the project instead focuses on operational carbon emissions and includes a suite of measures designed to minimise such emissions far beyond the standard practice of most developments of scale. These measures were informed by a greenhouse gas emissions analysis, with details provided in Section 10.8.4 of the EIS.

4.3.3. Wastewater Management & Air Quality

Several public submissions raised concerns regarding the potential impacts of the SBWTAP, particularly in relation to wastewater management, recycled water reuse, irrigation capacity, and air quality/odour from wastewater treatment and storage systems.

These matters were previously assessed in Section 10.1.1 and Section 10.3.5 of the EIS, supported by the Odour Impact Assessment prepared by Linnery Engineering Services (EIS - Appendix 8), and the LCA for Wastewater Treatment Design and Reuse Report prepared by Fluid Environmental (EIS - Appendix 16).

In response to the submissions received, a technical memorandum addressing the matters raised has been prepared by Fluid Environmental in discussion with Linnery Engineering Services, and is provided in ***Appendix 6.***

The key matters raised in submissions, and the Proponent's responses, are addressed below.

Air quality and Odour

The proposed development has been assessed with reference to NEPM guidelines, which focus on likely site contaminants rather than all possible pollutants. The ABSORBS™ wastewater treatment system selected for the development has a proven record of negligible odour generation across more than 100 installations, including high-capacity sites. Evidence from comparable systems, such as a 275 kL/day mining camp and treated water storage dams in the Northern Adelaide Plains, confirms that odours are not anticipated. Contingency measures, including the installation of charcoal filters or aeration, can be applied if required, without material cost or operational impact.

Wastewater Generation versus Irrigation Capacity

Submission raised queries regarding the alignment between annual wastewater generation (~26.4 ML) and irrigation/storage capacity (~22.27 ML) are addressed by noting that the Peak Design Flow (PDF) approach used in the calculations is deliberately conservative, assuming 100 % occupancy of the hotel, function centre, and winery facilities. Actual annual wastewater generation is expected to be significantly lower, with modelling indicating ~21.3 ML at 80 % occupancy and ~16.1 ML at 60 % occupancy. The ABSORBS™ dual-zone distribution system further reduces net generation by approximately 15 % through beneficial reuse.

The system meets sustainable irrigation requirements, aligns with FAO guidelines, meets sustainable water allocation requirements, and reduces reliance on groundwater resources.

Wastewater Treatment Risks

The proponent confirms that potential risks associated with system failure, mismanagement, or rainfall events have been considered. The ABSORBS™ treatment and reuse system is designed and operated under multi-barrier treatment standards in accordance with the *Australian Guidelines for Water Recycling: Managing Health and Environmental Risks 2006*.

Disinfection processes, including chlorine and UV treatment, are applied, and storage lagoons are incorporated into the design. Comparable recycled water irrigation schemes, such as the Willunga Basin Water Company and Virginia Pipeline Scheme, have operated successfully for decades without significant environmental impact, demonstrating the reliability and sustainability of the proposed approach. Therefore, the proposed recycled water irrigation risks are no greater than those of conventional groundwater irrigation.

Monitoring and Oversight

Independent monitoring and regulatory oversight will be provided through SA Health approval processes, with reporting obligations reviewed by the EPA. Licensed abstraction, water quality monitoring, and a Wastewater Management Plan will ensure environmental protection and community safeguards. Irrigation density within the development is lower than much of the surrounding Barossa region, further mitigating site-specific risks. No development will proceed without SA Health approval, ensuring compliance with all environmental and public health requirements.

4.3.3.1. Environment Protection Authority

The EPA raised a number of comments relating to the management of winery and human-generated wastewater, including the treatment process, storage, irrigation, odour control, and compliance with setback requirements. These matters have been considered and addressed in the supporting technical memorandum prepared by Fluid Environmental Pty Ltd.

For further clarification, the winery effluent (production) is treated in a separate system as detailed in Section 2.5 of the Odour Impact Assessment prepared by Linnery Engineering Services (EIS – Appendix 8). The human-generated effluent is treated through a dedicated treatment train, as detailed in the Wastewater Treatment Design and Reuse report prepared by Lucid Consulting (EIS – Appendix 16). Following treatment, the treated winery effluent will be combined with the treated recycled water from the hotel and winery in the irrigation balance storage for reuse on-site.

4.3.3.2. Northern and Yorke Landscape Board

The Proponent acknowledges the advice provided by the NYLB regarding wastewater management. The Proponent confirms that treated wastewater storage and reuse will be designed and managed in accordance with the Barossa Water Allocation Plan and relevant statutory requirements. All required permits for the construction of wastewater storage infrastructure and the use of treated wastewater will be obtained from the Department for Environment and Water, should the proposal be approved, and all applicable Environment Protection Authority requirements will be met at the detailed design and operational stages.

4.4. Economic Impacts

Numerous submissions, including that of the Barossa Council, highlighted the project's positive economic impact on the region. Specifically, they noted the creation of local employment opportunities and the growth of the tourism sector through improved accommodation options. Additionally, the development is expected to contribute to both local and regional economies by

increasing visibility for local businesses and incorporating locally sourced products and supply chains in its construction and ongoing operations.

4.4.1. Economic Benefits

Some submissions raised doubt regarding the purported economic benefits of the project for the region, with some representatives pointing out that visitors would be confined to the hotel and would not visit other locations in the region or spend money at local businesses. While we appreciate that how guests of the hotel choose to spend their time during their visit is out of the control of the operator or others, it is highly unlikely that guests would not take advantage of their visit to the Barossa and explore the region. Visitors are expected and encouraged to venture out in the Barossa region (in addition to the Adelaide Hills), take part into unique activities (such as a helicopter tour of the locality), discover the local food and wine scene (beyond what is offered on the site between the hotel and the winery), explore the Australian landscape via local hikes and bike rides. The hotel experience will aim to facilitate a whole of 'Barossa' encounter for guests, including the provision of local tourism information and promotions at local venues. The proponent has already received contact from local businesses who are keen to partner with the hotel to deliver an immersive experience of the local Barossa culture, including food, wine, and nature. It is also anticipated that local supply chains will greatly benefit from the proposal, both during the construction and operational phases by providing the materials and equipment required for the construction of the buildings, as well as the produce to be used at the restaurant and bar.

Similarly, it is the preference of the hotel operator to employ locally residing community members into the 150 hotel staff positions required. Experience with other regional hotels suggests that up to 83% of the hotel employees will live locally. As highlighted in the Regional Economic Impact Analysis submitted with the EIS, a significant portion of the local population currently commutes outside of the Barossa region to access work, resulting in unmet local demand. The proposal would result in an opportunity for people to access local employment, reducing the need to commute long distances and further strengthening the economic base of the region. While staff movement within the hospitality sector of the region is anticipated, the proposal is not expected to drain existing businesses of their staff, as a variety of roles will be on offer from IGH. New population growth in nearby areas such as Concordia will also supplement the local employee pool.

Further, pressure generated by the project on the local housing market is expected to be negligible as employees attracted to the region by the hotel are likely to find housing in Concordia and Gawler, as the supply of new dwellings is simply greater and more affordable in those areas.

4.4.1.1. Visitation/Demand

Other submissions brought concerns regarding the hotel booking rate being subject to seasonal changes, with low periods of attendance during the off-season. While booking rates are indeed influenced by the seasons, and expecting the proposed hotel to be fully booked all year round is unrealistic, the hotel being situated in such a unique natural landscape will be surrounded by a scenery constantly changing throughout the year. Winters in the Barossa offer a lush and green landscape while remaining dry enough to allow for outdoor excursions, which is in stark contrast with the dry and Mediterranean landscape of the summer months. While traditionally, rural hotels in Australia have the highest demand in summer, the Barossa, with the offer of Winter 'reds' and its impressive changing scenery, is anticipated to attract visitors all year round.

Concerns were raised in some public submissions regarding contradictions between the EIS and supporting documents from the SA Tourism Commission ('SATC') on the year-on-year visitation growth. Page 3 of the SATC Barossa Profile displays 4 graphs showing a steady increase in types of visitations or expenditure between 2010 and 2024. All 4 graphs show an overall steady, if not moderate, increase over the 14 years, with a dip around 2019 and 2020 attributed to the Covid 19 pandemic and closure of

Australian borders. All numbers post 2019 show an increase in visitation and expenditure compared with the previous years, which is aligned with Section 4.3.1. of the EIS.

Confusion seemed to have arisen from a SATC report highlighting a 60% occupancy rate in the current hotel offering of the Barossa, which was then labelled as “not a ‘capacity-constrained’ market”. The EIS made a clear distinction here between the types of accommodation currently provided (bespoke, smaller-scale accommodations) and the lack of 5-star resort-style accommodation operated by an internationally recognisable brand. The economic analysis provided in the EIS demonstrated that the proposal aimed at attracting a different type of clientele than the one currently visiting and staying in the Barossa.

4.4.1.2.Provision of Documentation

Comments highlighted the fact that the Hotel Demand Analysis was not made publicly available for consultation. This particular document, being commercial in confidence and containing research analysis on the tourism situation in Barossa, cannot be made public.

As demonstrated in the Regional Economic Impact Analysis submitted with the EIS, and supported by the Barossa Product Gap Audit prepared by the Australian Government, the region lacks large scale luxury hotel offering. The only similar establishment nearby is Novotel Barossa Valley, which features 140 rooms. This is not only insufficient for the region but also highlights a lack of competition in the sector, which needs to be filled. Although other similar projects received Planning Consent in recent years, such as Nexus, Oscar and the Sandy Creek Resort, there is no guarantee that any of them will make it to the construction phase. In addition, the point of difference with the Southern Barossa Wine and Tourist Accommodation Project is that it will provide an immersive experience within a functioning winery in conjunction with a world-class offering through IHG. The project will both satisfy unmet demand in this sector, as well as seek to attract new international tourists to the region through an internationally recognised brand. None of the other projects approved are currently internationally recognised brands. While the Oscar is built, it may eventually secure a known operator; this detail has not been publicly released, and furthermore, the site of the Oscar is more than 20km away from the SBWTAP site.

4.5. Hazards

4.5.1. Bushfire

In response to the submissions received, an additional technical memorandum addressing the matters raised has been prepared by SA Bushfire Solutions and is provided in ***Appendix 8***.

4.5.1.1.Response to Agency Referral (SACFS) and Barossa Council

Although significant concerns emerged from the community in regard to bushfire safety, SACFS does not oppose the project and recommends amendments to the proposal to ensure optimal protection from bushfire events and efficiency in protocols should a bushfire event happen nearby. These suggestions have been incorporated into the project as follows.

Fire Danger Days Protocols

The public consultation process, as well as further discussion between CFS and the project team, resulted in a review of the Draft Bushfire Emergency Management Plan (BEMP). While this document will be further resolved and finalised in collaboration with the hotel operator at a later stage of the project, the Draft BEMP now recognises the need to embody the following protocols and closure thresholds during fire danger days.

1. For Extreme Fire Danger Days, the emergency management strategy does not rely on default evacuation. Instead, occupants will be managed on site in accordance with the Bushfire Emergency Management Plan (BEMP) and under the direction of the Emergency Control Organisation (ECO), unless changing conditions or a specific, credible threat necessitate an alternative response.

2. Management of the site during Catastrophic Fire Danger Days will be established on best practice procedures in South Australia for high-occupancy uses in bushfire-prone environments. When required, site closure will be implemented in a planned and orderly manner, supported by advanced fire weather forecasting and communication, to ensure occupants are relocated off-site prior to the onset of hazardous conditions.

This approach is based on a risk assessment recognising that evacuation during extreme fire weather may result in greater risks than remaining on the site, in particular for people with limited mobility, those unfamiliar with the local rural landscapes or with limited English proficiency. Uncoordinated large groups could also result in a hazard of their own on rural roads. A defined Emergency Control Organisation and advanced fire weather monitoring, provided by the Bureau of Meteorology, will allow the elaboration of effective protocols and forecasting of fire weather up to four days ahead, enabling proactive planning.

This distinction reflects contemporary bushfire risk management principles, which recognise that evacuation is not universally the safest response in all fire weather conditions. Where a site has been purpose-designed, constructed, and managed to reduce bushfire exposure, a managed shelter-in-place strategy during Extreme fire weather may provide a lower residual risk outcome than evacuation along constrained rural road networks.

The managed shelter-in-place strategy provides enhanced resistance to ember fire attack, radiant heat and flame contact through a BAL 19 construction standard, a carefully managed vegetation and defendable spaces provided with dedicated on-site fire water fighting supplies and infrastructures.

Notwithstanding the above, all operating responses and emergency management actions (for bushfire) remain subject to real-time conditions and incident-specific advice or direction from emergency services, including the South Australian Country Fire Service.

Bushfire Resilience

In response to representations received on the need for increased bushfire resilience and safety measures, the following initiatives have been adopted.

A Bushfire Emergency Management Plan (BEMP) and Fire Hazard Management Plan (FHMP) will be prepared and appropriately updated, as indicated in section 6.4 of the EIS. In addition, the company and/or its operators will be required to engage on a regular basis with on-site training and routine practice of the emergency response. A Bushfire Survival Plan (BSP) will be designed specifically for the purpose of any guests that may be in residence during a bushfire event. The BSP will be on display once finalised and construction of the hotel is completed.

A manifest box will be located at the main entrance of the site, and static fire water tanks for bushfire and building fires will be installed in accordance with CFS requirements.

A 20m Asset Protection Zone will be implemented around the hotel (or to the property boundaries – whichever comes first) where vegetation shall be established and maintained as follows:

1. The number of trees and understorey plants existing and to be established within the APZ shall be reduced and maintained such that when considered overall, a maximum foliage coverage of 30% is attained, and so that the leaf area of shrubs and trees is not continuous and not within 5m of surrounding hazardous vegetation.

2. Careful selection of the vegetation will permit the ‘clumping’ of shrubs where desirable, for diversity, and privacy and yet achieve the ‘overall maximum foliage coverage of 30%. These clumps shall not exceed 5m2 and shall be separated by at least 5 metres.
3. Trees and shrubs shall not be planted closer to the building(s) than the distance equivalent to their mature height.
4. Trees and shrubs must not overhang the roofline of the building, touch walls, windows, or other elements of the building.
5. Shrubs must not be planted under trees or must be separated by at least 1.5 times their mature height from the trees’ lowest branches.
6. Grasses within the zone shall be reduced to a maximum height of 10cm during the Fire Danger Season.
7. No understorey vegetation shall be established within 2 metres of the habitable building (understorey is defined as plants and bushes up to 2 metres in height).
8. Flammable objects such as plants, mulches and fences must not be located adjacent to vulnerable parts of the building, such as windows, decks, and eaves.
9. The APZ shall be maintained to be free of accumulated dead vegetation and debris, including leaves, twigs, and bark.
10. Reduction of vegetation shall be in accordance with the *SA Native Vegetation Act 1991* and the *SA Native Vegetation Regulations 2017.*

Report Corrections

Some representations noted that the Bushfire Risk Assessment, in Appendix 17 of the EIS, contained errors, including a generalised description of the topography of the site and an incorrect map. Comments were made regarding the accuracy of the risk assessment itself due to those errors.

The Bushfire Risk Assessment does not rely on a single averaged slope value, nor does it assume flat terrain. Slope is a recognised factor influencing bushfire behaviour, particularly the rate of spread and radiant heat exposure. The site comprises rolling terrain with variable slopes, consistent with foothill Barossa landscapes. Slope expressed in percentage terms within broader project documentation equates to single-digit degree slopes and does not represent extreme escarpment conditions. The assessment adopts a precautionary, qualitative risk framework aligned with ISO 31000 and the National Emergency Risk Assessment Guidelines (NERAG), resulting in a Very High pre-mitigation risk classification. Nonetheless, the topography description has been updated to more accurately reflect the terrain of the subject site, and the location map was corrected.

Access & Egress

As raised during consultation, the intersection of Hoffnungsthal Road and Lindner Road presents geometric constraints limiting the simultaneous passage of emergency vehicles and general traffic. In addition, the intersection cannot be widened due to the presence of regulated/significant trees.

To mitigate vehicular conflict during bushfire events, the evacuation protocols were revised to only trigger relocation of guests in case of Catastrophic Fire Danger Days and not Extreme Fire Danger Days. This will allow an orderly and planned evacuation of the site, if necessary, instead of a reactive evacuation and therefore minimise vehicular congestion.

Additionally, signage will be installed, in conjunction with Council, along Hoffnungsthal Road, displaying clear egress to Lyndoch and Williamstown.

4.5.2. Infrastructure and Services

A number of submissions raised concerns regarding the capacity of existing utility infrastructure, including electricity and water supply, noting reported issues such as brownouts and water scarcity in the area.

The Proponent confirms that discussions and negotiations with relevant service providers are well advanced, and that the proposal has received positive preliminary feedback. Final servicing arrangements will be confirmed and implemented in consultation with the relevant authorities should the development be approved.

4.6. Physical Environment

4.6.1. Surface Water, Groundwater & Flooding

A few public submissions raised concerns regarding the potential impacts of the SBWTAP, particularly in relation to potential impacts to downstream watercourses, aquifer quality, neighbour bore water, and the adequacy of conceptual stormwater and waste management measures.

These matters were previously assessed in Section 10.5.3 and Section 10.7.3 of the EIS, supported by the Civil & Stormwater Management Report prepared by MLEI Consulting Engineers (EIS - Appendix 18). In response to the submissions received, a technical memorandum addressing the matters raised has been prepared by MLEI Consulting Engineers and is provided in ***Appendix 7***.

The key matters raised in submissions, and the Proponent's responses, are addressed below.

Stormwater Management and Retention

The development incorporates retention basins (196 kL for the hotel, 144 kL for the winery), rainwater harvesting (50 kL for hotel irrigation, capturing ~3,500 m² roof area), and bioretention swales to manage peak flows, attenuate runoff, and provide water quality treatment consistent with WSUD principles. Concept-level modelling confirms post-development peak flows will not exceed pre-development conditions. Detailed design will finalise basin sizing, locations, discharge points, and overflow controls.

Groundwater Protection & Neighbouring Bores

No new groundwater extraction is proposed. Existing licensed groundwater allocations for vineyard irrigation will continue to be managed in accordance with licence conditions. Salinity monitoring and adaptive management will continue to support sustainable irrigation practices.

Flood, Erosion, and Sediment Controls

Proposed conceptual earthworks, drainage pathways, and stormwater detention measures demonstrate that feasible outcomes can be achieved to minimise downstream flood and erosion risks. Detailed design will include geotechnical and infiltration testing, final basin geometry, SEDMPs, and construction-phase controls to ensure ongoing performance and compliance.

The concept design demonstrates that compliant and effective stormwater, wastewater, and flood management solutions are achievable. Detailed design, regulatory approvals, and ongoing operational measures will further ensure that risks to downstream watercourses, groundwater, and neighbouring properties are appropriately managed.

4.6.1.1. Environmental Protection Authority

The EPA raised a number of comments relating to stormwater management, including the design of detention basins, bioretention swales, erosion control measures, and maintenance requirements. These matters have been considered and addressed in the supporting technical memorandum prepared by MLEI Consulting.

Notwithstanding the raised matters, the EPA has raised no concerns regarding the general stormwater management strategy or its effectiveness. In particular, the EPA accepted that the proposed measures, including detention basins, swales, permeable

paving, and watercourse rehabilitation, are suitable to manage post-development flows, achieve water quality targets, and minimise erosion and sediment transport, subject to the preparation of a Soil, Erosion and Drainage Management Plan and consideration of ongoing maintenance.

4.6.1.2. Department for Environment and Water & Northern York Landscape Board

The Northern and Yorke Landscape Board (NYLB) and DEW have provided comments regarding the management of surface water and groundwater for the project. These comments have been noted and are addressed below.

Surface Water Capture : The proposed development includes a rainwater harvesting system for the hotel component with a total tank capacity of 50 kL. The captured water will be used for on-site landscape irrigation only. The roof area available for capture is approximately 3,500 m².

Subject to detailed design, should captured runoff exceed thresholds that trigger licensing under the *Barossa Water Allocation Plan* and the relevant Notice of Authorisation to Take Water, the proponent will engage with the Department for Environment and Water during detailed design to confirm whether a licence is required. Controlled overflow and non-capture measures will ensure environmental flows are maintained in accordance with Water Allocation Plan principles.

Stormwater Retention and Detention : Stormwater management includes retention basins with capacities of 196 kL for the hotel and 144 kL for the winery. These basins are designed to attenuate peak flows, provide water quality treatment, and maintain downstream flow regimes. Detailed design will confirm final basin sizes, locations, and discharge points, and will address water affecting activity permit requirements, as necessary.

Groundwater Use : No groundwater extraction is proposed for the construction or operation of the development. Existing licensed groundwater allocations for vineyard irrigation only (15.8 ML from Barossa Prescribed Water Resources Area bores and 10 ML from Barossa Infrastructure Limited) will continue to be managed in accordance with licence conditions. Salinity monitoring will be maintained to support adaptive water management under the *Draft Barossa Water Allocation Plan 2025*.

Engagement and Detailed Design : The proponent acknowledges that final elements, including roof capture licensing, basin configurations, discharge structures, and access-related drainage, will be resolved during detailed design. Ongoing engagement with the NYLB and DEW will ensure alignment with the *Landscape SA Act 2019*, the current and draft Water Allocation Plans, and water affecting activity requirements.

4.7. Social and Community

4.7.1. Aboriginal Cultural Heritage

The main concern raised by public submissions on the topic of Aboriginal Cultural Heritage relates to a perceived lack of engagement with Traditional Owners. Particular reference was made to the Peramangk People.

Although it is acknowledged that the Barossa Valley holds cultural significance to three Aboriginal groups (being the Kaurna People, the Peramangk People, and the Ngadjuri People), Kaurna was identified as the relevant Recognised Aboriginal Representative Body for the project site, as determined in the Assessment Criteria, prepared in conjunction with the relevant government agencies.

Accordingly, in-depth consultation took place with the Kaurna Yerta Aboriginal Corporation (KYAC), as the Traditional Owner of the Land. A successful engagement allowed for discussions regarding the project, as well as a site walkover with KYAC

representatives and the proponent team, facilitated via ACHM, to gather feedback and assist in identifying areas or sites of significance. The overall design was positively received, and several important considerations and concerns were raised during the discussion. This led to modifications in the design of the proposal, such as positioning of the buildings on site, management of culturally significant items and adequate representation of Aboriginal ties to the Land. More details are available in the Baukultur response to ODASA in ***Appendix 3***.

Notwithstanding, early and iterative communication with the Peramangk and Ngadjuri People was also undertaken as part of broader stakeholder engagement phases, as indicated in the Engagement Plan submitted with the EIS.

Feedback was received from the Aboriginal Affairs and Reconciliation (AAR) through the Attorney General's Department, in regard to the appropriate steps to be taken in the event of an accidental archaeological discovery.

5. CONCLUSION

This Response Document has been prepared to comprehensively address matters raised during public consultation of the Southern Barossa Winery and Tourist Accommodation Project (SBWTAP). It demonstrates that all submissions have been carefully considered and responded to through clarification of the proposal, refinement of management measures, and the preparation of additional technical assessments where required. The extent of consultation undertaken, both prior to and during formal exhibition of the EIS, has directly informed the final design, operational commitments, and mitigation framework for the Project.

Issues raised through consultation encompassed a broad range of environmental, social, and economic considerations, including visual amenity and landscape character, traffic and access, bushfire risk, biodiversity, water and wastewater management, biosecurity, and alignment with State and regional planning policy. As detailed throughout this document, these matters have been assessed against relevant statutory requirements and best-practice guidance. Independent specialist advice confirms that potential impacts can be effectively avoided, mitigated, or managed through the proposed design response and the implementation of comprehensive construction and operational management plans. Importantly, no government agency has objected to the proposal, and agency feedback indicates that, subject to appropriate conditions, the development can be undertaken in a manner consistent with applicable legislative, policy and technical standards.

In its final form, the SBWTAP represents a well-considered and carefully sited development that responds to the distinctive landscape and character of the Southern Barossa, while supporting regional economic diversification, tourism growth, and local employment. The proposal is consistent with the intent of the Impact Assessed pathway by appropriately balancing environmental protection with social and economic outcomes and by embedding clear, enforceable commitments to mitigation, management, and monitoring. Having regard to the matters raised through consultation and addressed herein, the Proponent maintains that the SBWTAP is suitable for approval and can be delivered in the public interest, consistent with the objectives of the *Planning, Development and Infrastructure Act* 2016 and the State Planning Policies.

APPENDIX 1

Acoustic - Response Letter : Sonus

sonus.

Ekistics
Level 3, 431 King William Street
Adelaide SA 5000

S8402C8

Attention: Rebecca Thomas **29 January 2026**

Dear Rebecca,

SOUTHERN BAROSSA WINERY & TOURIST ACCOMMODATION PROJECT
RESPONSE TO PUBLIC CONSULTATION

An Environmental Noise Assessment for the Southern Barossa Winery and Tourist Accommodation Project was prepared by Sonus in August 2025 (Sonus report reference S8402C6) (the **Acoustic Assessment**). This letter provides a response to matters that were raised in relation to the Acoustic Assessment, during the public and agency consultation. The matters are summarised as follows:

- There was concern that the EIS does not provide a clear or enforceable framework to manage and monitor operational noise from the hotel, functions, outdoor areas and plant. Issues included the absence of management / monitoring plans and enforceable noise limits.
- The EIS does not model helicopter cumulative noise exposure, peak operating scenarios, or account for exposure over extended periods.

Responses

As the hotel guests would be most impacted by any noise that would be generated at the development, managing noise to a suitable level at the hotel would also result in a suitable level of noise at the surrounding residential locations, which are located at a much greater distance.

It is common practice for any condition of consent to provide enforceable noise limits, that could be referred to in the event of a complaint. For this project, the relevant noise limits are summarised below:

- For music noise, limit the level of music played in various areas to the following:
    - Within the ballroom of the hotel, a level of 98 dB(A) (105 dB(C)).
    - Outside of the hotel, a level of 73 dB(A) (81 dB(C)) at 3m from a performer.
    - Outside of the winery, a level of 73 dB(A) (81 dB(C)) at 3m from a performer.
    - Within the function space of the winery with the doors open, a level of 79 dB(A) (87 dB(C)).

  - Within the function space of the winery with the doors closed, a level of 100 dB(A) (108 dB(C)).
  - The above music levels would be measured using the L_{10} descriptor over a 15-minute measurement period.
- For all other noise sources (e.g. mechanical plant, patrons, car parking and vehicle movements):
  - An average goal noise level (L_{eq}) of 52 dB(A) during the day period (7:00am to 10:00pm).
  - An average goal noise level (L_{eq}) of 45 dB(A) during the night period (10:00pm to 7:00am).
  - The above average goal noise levels would be measured and assessed in accordance with the *Environment Protection (Commercial and Industrial Noise) Policy 2023*.

It is noted to be good practice for entertainment venues and hotels (where relevant) to have a management plan in place for functions and events. Given the nature of the high-end hotel development, it is likely that the hotel operator would have such plans and procedures in place to manage the noise impacts for their guests and surrounding noise sensitive receivers.

In relation to the issue of helicopter noise, it is understood that the hotel operator will not have any helicopters operating from the site and as such, there will not be any cumulative noise exposure from helicopter operations in the area, or any peak operating scenarios and extended operating periods to model and consider with respect to helicopter operations.

Nevertheless, the Acoustic Assessment does consider the cumulative noise impacts from the new hotel and winery, along with all other noise sources in the locality (including the existing helicopter charter business). The Acoustic Assessment concluded the following in relation to cumulative noise exposure:

> *"…the low background noise levels measured at the site indicate that the average noise levels from the helicopter business, and other activity in the area, is negligible. As such, there are not any predicted cumulative impacts for the nearby noise sensitive receivers."*

If you have any questions or require clarification, please call me.

Yours faithfully
Sonus Pty Ltd

Simon Moore
Manager
0402 857 579
smoore@sonus.com.au

APPENDIX 2

Traffic - Technical Memorandum : CIRQA

Technical Memo

To:	Ryan Moyle/Rebecca Thomas (Ekistics)		
From:	Ben Wilson (CIRQA)		
Copy:	Nick Argyros/Melody Young (Turner & Townsend)		
Date:	29 January 2026	**Project no.:**	24590
Project:	Southern Barossa Winery and Tourist Accommodation Project Response to Referral Agency and Community Consultation Comments		

I refer to the Southern Barossa Winery and Tourist Accommodation Project (SBWTAP) and the responses received from referral agencies and the community during recent consultation processes. As requested, this technical memorandum addresses the matters raised.

1. REFERRAL AGENCIES

1.1 THE BAROSSA COUNCIL

Comments provided by The Barossa Council in respect to the proposals are provided below, followed by our response.

Comment Received	CIRQA Response
"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."	Noting the current limitations on public transport and rideshare accessibility within the vicinity of the site, the impact assessment assumed that access associated with the site would be via private vehicles supplemented with private bus services (particularly for groups) and private transfer/tour services (by external operators and potentially by the hotel operator). Should there be future improvements in accessibility by other modes (public transport/rideshare), this would be a positive outcome. However, the proposal is not reliant on this occurring.
"Potential conflict of visitor vehicles and commercial winery operation vehicles (up to articulated vehicles) is undesirable."	Full separation of light and commercial vehicles was considered for the winery. However, such arrangements were not possible due to the sight

	distance restrictions for access provision on Hoffnungsthal Road. Ingress movements have been separated for the two vehicle streams, however, due to the constraints, egress movements are proposed to be shared. The arrangement therefore optimises separation of the vehicle stream within the bounds of the constraints (i.e. ensuring safe access provisions). Noting this occurs over a short distance and where all vehicles will be travelling in a forward direction, the arrangements are considered safe and acceptable. Notably, light vehicle movements are not required in areas where commercial vehicles would undertake turnaround or reversing manoeuvres.
"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 driveway design has been adopted to accommodate the turning movements of the design vehicles associated with the site. Further review (comprising additional delineation to define the perpendicular approach or realignment) can be addressed as part of detailed design.
"Measures should be in place to prevent vehicles larger than 11m rigid from accessing the loading dock."	Typical service and delivery vehicles (including large food and beverage trucks, large linen service trucks, large refuse collection vehicles) are 11.0 m or less. It is not anticipated that larger vehicles would be required to access the loading dock (nor are specific measures considered required).

In addition to the above, I note that The Barossa Council has raised no issue with the general traffic impact assessment undertaken nor the conclusions that the associated traffic movements (including both light and heavy vehicles) can be accommodated on the local road network.

1.2 DEPARTMENT FOR INFRASTRUCTURE AND TRANSPORT

Comments provided by the Department for Infrastructure and Transport (DIT) in respect to the proposals are provided below, followed by our response.

Comment Received	CIRQA Response
"Subject to Deed for works and detailed design. Issues that may require further clarification/confirmation, include: *• Lighting of junction* *• Land requirements at junction to cater for turn*	This is the intended approach in respect to the external works and considered appropriate.

treatments *• Future entrance statement or tourist/service centre signage (AS1742.6).* *• All treatments are as per Austroads Guide, DIT Master Spec[ification]"*	
"Basic Left Turn (BAL) is required with full depth pavement instead of shoulder sealing."	The recommended treatment has been based on the provisions of the Austroads' Guidelines (which notably does not require sealing of the shoulder). Nevertheless, this matter can be negotiated further with DIT as part of preparation of the Deed and further design inputs.

In addition to the above, I highlight that DIT has raised no issue with the general traffic impact assessment undertaken nor the conclusions that the associated traffic movements (including both light and heavy vehicles) can be accommodated on the arterial road network.

2. COMMUNITY

Key matters raised during through the community consultation process are identified below, followed by our response.

Comment Received	CIRQA Response
Potential for impact on access for the Barossa Helicopters and Lavender Farm sites as a result of increased traffic volumes.	As detailed in the traffic impact assessment report, the forecast traffic volumes are well within the capacity of the adjacent road network (subject to the external works noted). It is also noted that The Barossa Council has raised no issue with such conclusions. There would be negligible impact on accessibility for Barossa Helicopters and Lavender Farm sites as a result of the proposal. In reality, there will likely be some positive impacts given there may be 'shared trips' between the subject proposals and these two nearby sites.
Potential for need to upgrade Tweedies Gully Road as a result of increased traffic volumes.	As detailed in the traffic impact assessment report, the level of traffic movements likely to be undertaken via Tweedies Gully Road will be very low. The anticipated volumes would not warrant upgrade of this road. Notably, Council has not raised issue with the assessment in respect to Tweedies Gully Road.
Proposed location of the winery complex (and its access points) should consider the impact to the	The proximity of the Hoffnunsthal Road/Tweedies Gully Road intersection and the associated sight distance limitations (due to the vertical alignment

nearby "blind road junction" (Hoffnunsthal Road/Tweedies Gully Road intersection).	of Hoffnungsthal Road in this area) was a key consideration in the planning and design of the access arrangements for the Winery. The proposed location of the Winery access points have been based on achieving sufficient separation and sight distance from the intersection and the associated road environment constraints in its vicinity.
Potential for GPS 'tools' to direct vehicles associated with the sites via Tweedies Gully Road.	This was considered and reviewed during preparation of the traffic impact assessment. Typical GPS 'tools' such as Google Maps and Apple Maps identify the primary access route as being via the Lyndoch Valley Road/Hoffnungsthal Road intersection rather than via Tweedies Gully Road for all major directions via the broader arterial road network. Nevertheless, allowance has been made in the assessment for a proportion of drivers to utilise the Tweedies Gully Road route. In addition, the proponent has advised that the access route via Lyndoch Valley Road/Hoffnungsthal Road intersection can be reinforced through information provided to guests, staff and suppliers of both the tourist accommodation and winery facilities.
Perceived inadequacy of local roads to accommodate the additional traffic volumes.	Impacts on the surrounding road network has been considered in line with industry standard methodologies, standards and guidelines. The assessment has identified that there is adequate road (and intersection) capacity within the study area (and beyond) to accommodate the additional movements (noting the recommendations in respect to external works to ameliorate impacts). Notably, neither DIT nor The Barossa Council has raised issue with the conclusions form in respect to such matters.
Query in respect to heavy vehicle movement numbers.	In respect to the Winery, based on operational information provided, it is anticipated that there would typically be approximately 8 service/delivery trucks per week associated with general operations (or just over 1 commercial vehicle movement per day). This includes

	consideration of the winery operations as well as the cellar door and restaurant. During vintage, there would be an additional (average) of approximately 5 grape delivery trucks per week. In addition, there would be infrequent transport of bulk wine, finished goods and/or bottled wine from the site anticipated to equate to up to 14 movements across the year (well below one movement per week on average). Including additional allowance for bus access associated with visitors, it is anticipated that volumes would generally average in the order of 2 to 4 commercial vehicles per day during vintage (and less at other times). Such volumes are very low. In respect to the tourist accommodation, comparison has been made to the traffic volumes recorded in the vicinity of the Novotel Barossa (as discussed in the original traffic impact assessment). The data indicates an average of just below 15 commercial vehicles per day access the Novotel site (which would include service and delivery vehicles as well as buses). The Novotel is of a similar size to the subject proposal, albeit includes a golf course. The above volume is therefore likely to be conservative for application to the subject proposal. Nevertheless, for conservatism, it is assumed a similar level of commercial vehicles will be associated with the subject site. Notably, the commercial vehicle classification from the data includes small and medium trucks as well as larger delivery trucks (such as the 11.0 m trucks anticipated for the subject proposal) and buses (no articulated vehicles were recorded). It is anticipated that such movements would generally be spread across approximately 14 hours of the day (potentially later for occasional bus movements at the end of functions/events). Therefore, there would be an average of approximately one commercial vehicle accessing the site each hour. Such volumes are low and would present negligible impact or conflict risk within the site or on the surrounding road network.

Limited access by public transport, taxis and rideshare.	As detailed above, it has been assumed accessibility levels associated with such modes will be as per existing conditions (i.e. limited). Should increased access by such modes be achieved in the future, this would be a positive outcome. However, the assessment is not reliant on such an outcome. It is also noted that reference was made to limited benefit to the broader region due to limited transport accessibility. We do not concur with such comments noting that: • many guests will access the site via private vehicle (and be able to access other locations); • there are private tours available within the Region for guests without vehicles (or those that wish not to drive particularly to/from wineries); and • it is not uncommon for conference guests in Regional locations to be bussed to/from broader destinations/attractions.
Under provision of car parking for the Winery component.	A detailed (and conservative) assessment of parking provision for the Winery was included in the traffic impact assessment report. This has been based on typical methodologies for assessment of the associated land use components, including consideration of observations/data from similar facilities. Notably, direct application of the Planning and Design Code's DTS/DPF rates commonly overestimates parking demands associated with such facilities and this has been acknowledged during numerous development applications for wineries within South Australia. This includes wineries previously approved by The Barossa Council, which has notably raised no concern in respect to the level of parking proposed.

I trust the above sufficiently responds to the matters raised by the referral agencies and the community (in respect to traffic matters). However, please feel free to contact me should you require any further information.

Yours sincerely,

BEN WILSON
Managing Director | CIRQA Pty Ltd

APPENDIX 3

Response Letter to ODASA : Baukultur

baukultur

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Ground Floor 28 Franklin St
Adelaide SA 5000

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ABN 59 638 145 150

19 January 2026

Kirsteen Mackay
Government Architect
Office of Design and Architecture South Australia
91 Halifax Street
Adelaide SA 5000
Kaurna Country

Dear Kirsteen

Re: Southern Barossa Winery and Tourist Accommodation Project

Thank you for your letter dated 19 December 2025.

As part of the Environmental Impact Statement assessment process, please find attached our response.

The Design Team acknowledge and appreciate your support for a contemporary, high-quality tourist accommodation and winery development in the Barossa, and recognition of the significant economic and social benefits the project will deliver. In particular, the development will contribute to increased tourism visitation, strengthen the region's position as a premium destination, and generate ongoing local employment opportunities during both construction and operation.

We also note your acknowledgement of the amendments undertaken by the design team in response to comments received following the second Design Review Panel meeting. These changes have been carefully considered and are aimed at directly addressing the Panel's feedback. Key amendments included a reduction in the overall visual impact of the development through lowering the eastern wing by one storey and sinking the entire development further into the site, thereby significantly improving the building's scale and relationship to the surrounding landscape to the south whilst maintaining view amenity to the north.

In addition, endorsement has been provided by the IHG design manager and engineer, confirming that the design appropriately responds to and resolves the functional matters raised by the Design Review Panel. To further contextualise the proposal, a footprint study of buildings of comparable scale within the Barossa has also been undertaken, demonstrating that the proposed development sits comfortably within the established built form and is consistent with the scale of existing regional developments.

A key recommendation of the Design Review Panel was to break the building into a 'collection of terraced built form elements'. In response, the design team undertook a detailed investigation of this recommendation, including testing its spatial, operational, environmental and visual implications against the project's objectives and constraints.
Through this analysis, it became clear that a fragmented, terraced arrangement would introduce significant functional inefficiencies, increase site disturbance, and compromise both the architectural clarity of the proposal and its relationship to the landscape. In particular, the terraced approach was found to be less effective in delivering a compact footprint, streamlined hotel operations, and a cohesive built form outcome.
As a result, and based on this evaluation, the design team has intentionally adopted a 'stacked' configuration for the hotel accommodation, as it better aligns with the project's functional,

environmental, and architectural objectives. This approach has been adopted for the following reasons:

Minimise the building footprint. A scattered, low-density approach to accommodating the hotel's required floor area would consume significantly more site area than the proposed stacked arrangement. This would materially reduce the land available for ongoing vineyard operations and agricultural use. By contrast, a more consolidated form enables the necessary hotel functions to be accommodated efficiently while preserving a greater proportion of the site for viticulture. The spatial inefficiency of dispersed resort-style developments is evident in comparable projects elsewhere, which frequently require many hectares of land to deliver similar accommodation and amenity offerings.

Minimise guest and housekeeping circulation. Reducing travel distances through a more compact footprint is essential to delivering a high-quality guest experience while improving housekeeping operational efficiency. By minimising internal circulation distances, guests experience smoother and more intuitive wayfinding, reduced walking times, and a greater sense of comfort and convenience throughout the building. Similarly, a more efficient layout supports housekeeping staff by shortening travel routes, reducing repetitive movement, and enabling more streamlined servicing of rooms. Together, these efficiencies contribute to improved operational performance, enhanced guest satisfaction, and a more functional and sustainable overall design outcome.

Engineering efficiency. By stacking the building vertically, key structural elements—such as columns, walls, and footings—and major building services—such as pipes, ducts, and cable pathways—can be strategically aligned across floors. This vertical coordination simplifies design, reduces the need for offsets or additional structural interventions, and minimises clashes between disciplines during construction.
The result is a more efficient use of materials, as fewer transfers, beams, and complex support structures are required. This reduction in material quantities not only lowers construction costs but also significantly decreases the building's total embodied carbon. In addition, streamlined service routes improve constructability and can shorten the overall construction programme, further contributing to cost savings and environmental performance. The efficiencies achieved through a more compact footprint also contribute to improved financial viability in both capital and operational expenditure.

Fire and Safety Management. A more condensed building footprint materially improves the project's ability to meet Bushfire Attack Level (BAL) requirements and overall emergency management outcomes. The current design achieves a BAL rating of 19, largely through the strategic management and removal of hazardous vegetation within the required setback distances and siting the building no closer than 18 metres to any boundary. Achieving this outcome would be substantially more complex, less reliable, and require significantly more vineyard removal if the hotel were dispersed across multiple separate buildings.
The consolidated built form also enables essential fire-fighting infrastructure, equipment, and controls to be centrally located. This improves the clarity of fire source identification, reduces response travel distances for emergency services, and minimises the extent of fire-fighting infrastructure required across the site. In addition, a single building simplifies guest and staff muster arrangements, providing clearer, more manageable and more effective emergency evacuation and coordination in the event of a bushfire or other emergency.

Built Form. The design team considers that fragmenting the building into smaller components of uniform height would disproportionately accentuate vertical proportions and create an unnecessary sense of visual tension and fragmentation within the landscape. By contrast, the adopted design deliberately emphasises the horizontal articulation of the building elements, allowing the built form to sit more comfortably within the rolling topography of the Barossa. This

horizontal emphasis reduces the perceived visual mass when viewed from the north and enables the building to read as a more grounded, integrated, and landscape-responsive form against the hills beyond.

The following responds directly to the concerns expressed in the letter from ODASA to Robert Kleeman on 19th December 2025

Item : Design Principles and contextual / cultural analysis

We appreciate your acknowledgment and support for our community engagement process and the walk on country with Kaurna elders.

On Tuesday 4th February 2025, prior to a pedestrian archaeological survey, George Economou (the Client) and Chris Watkins met with representatives of the Kaurna Yerta Aboriginal Corporation (KYAC), including Darren Wanganeen, Kitanah Wanganeen, Shine Wanganeen, and Tyrese Wanganeen. The meeting provided an opportunity to present the project design in detail and to engage in a comprehensive discussion regarding cultural outcomes, potential concerns, opportunities for cultural tourism, and future employment prospects for KYAC representatives and the wider Kaurna community.

Overall, the design was received positively. However, several important considerations and concerns emerged during the discussion, which have since been addressed by the design team to ensure the project is culturally sensitive and responsive:

Creeks and Natural Watercourses – KYAC representatives identified the creeks and natural watercourses on the site as significant cultural and environmental features. They emphasised that all future development should avoid interference with these areas. Additionally, these natural features were highlighted as opportunities for guided Kaurna storytelling when the building is operational. In response, the design has been carefully adapted to ensure that the building and internal road network are sited away from these watercourses, preserving their integrity and enabling cultural interpretation.

Labelling of Sacred Trees and Culturally Significant Elements – It was made clear that labelling sacred trees or other items of cultural significance is inappropriate. Cultural knowledge is intended to be shared through spoken storytelling by those authorised to do so, rather than through signage. As a result, all labelling and signage of these elements will be avoided, ensuring that the transmission of cultural knowledge remains respectful and authentic.

Cultural Representation in Built Form – The representatives explained that attempting to reflect Kaurna culture directly in the architectural or landscape design could be considered offensive. They emphasised that cultural heritage is best conveyed through storytelling and engagement, rather than through physical motifs or design symbolism. The design team has acknowledged this guidance and committed to ensuring that cultural interpretation is delivered through appropriate educational and experiential methods rather than through building form.

Ridgelines and Potential Burial Sites – The ridgelines of hills were historically used as burial grounds. Interestingly, these ridgelines also represent prime locations for the proposed building due to the maximisation of views across the landscape. KYAC representatives discussed the likelihood of discovering human remains, noting that it is considered low because of shallow burial practices due to the presence of sub-surface rock, and historic agricultural activity that may have disturbed any intact remains. Nevertheless, an Unanticipated Finds Procedure has been developed in consultation with KYAC and is outlined in the Environmental Impact Statement (EIS) to manage any such eventuality respectfully and appropriately.

Beyond these design considerations, KYAC representatives expressed a strong interest in discussing future employment opportunities for First Nations people in the operation of the hotel. This topic was highlighted as of particular importance, surpassing other discussion points in significance. The Client agreed to explore these opportunities further in collaboration with IHG and KYAC, and other relevant stakeholders. This commitment underscores the project's broader goal of creating meaningful economic and cultural benefits for the local Aboriginal community alongside the development of the hotel.

Through this engagement, the project has incorporated KYAC guidance to ensure that the design, construction, and operational strategies are culturally sensitive, environmentally responsible, and inclusive, while also delivering a high-quality experience for guests. The consultation has provided a foundation for ongoing collaboration with KYAC to safeguard cultural heritage, promote community participation, and respect the site's historical and spiritual significance.

Item : Built form siting, massing and response to topography

We acknowledge your reference to the Visual Impact Assessment provided as part of the EIS documentation as going 'some way' toward demonstrating the limited visual impact of the built form from various vantage points around the site, noting that these viewpoints were identified in consultation with the Design Team by DHUD.

We also note your observations regarding the prominence of the singular, linear built form and its horizontal expression within the undulating landscape. As outlined above, this is a deliberate and considered outcome of the design. The scheme purposefully emphasises the horizontal articulation of the building elements to complement—rather than compete with—the rolling topography of the Barossa, ensuring the built form sits comfortably, coherently, and responsively within the landscape.

Two buildings were suggested by the Design Review Panel as examples for the design team to explore how to better reduce the visual prominence and ground the building to form part of the landscape. These were Kandalama Hotel, Sri Lanka by Geoffrey Bawa, and Therme Vals, Switzerland by Peter Zumthor.

<u>Kandalama Hotel</u>
This example is an iconic architectural masterpiece comprising a series of 5-6 story stacked accommodation blocks flanking a central amenities block arranged in a lineal pattern with each block rotated to trace the geometry of the steep cliff face to the rear. The blocks are separated creating interstitial spaces revealing views to the surrounding environment. The building is carved into the rock face, with vegetation growing over its roof and walls, making it appear to emerge from the surrounding tropical jungle.

1. The Barossa Hotel adopts a similar planning strategy and siting strategy of 'carving' into the hill (up to 7m deep) to reduce the apparent visual bulk from the rear (south) whilst maintaining views to the front (north).
2. The interstitial spaces between the blocks of the Kandalama Hotel create opportunities to reveal the view from the circulation routes, however the extra circulation length results in up to 240m of travel distance between guest rooms and the centrally located guest amenities. Currently the Barossa Hotel requires up to 100m of travel distance which is at the upper end deemed acceptable by both Client and Operator. Additional travel distance due to the introduction of interstitial spaces have therefore not been adopted.
3. Whilst the square/rectangular proportions of the accommodation blocks work visually against the carved cliff backdrop, in our opinion, this proportion would result in a visually jarring experience against the horizontally rolling hills of the Barossa Hotel site backdrop. Therefore a low, linear horizontal proportion has been adopted which subtly counterpoints the rolling hill backdrop.

4. The tropical location of Kandalama allows lush vegetation to grow over the roof and walls, visually 'immersing' it into the surrounding jungle environment. Since the ability to grow vegetation over the Barossa Hotel is limited, the design instead utilises materials such as oxidised steel, natural stone and rough concrete which will naturally weather and visually blend into the site.

Therme Vals
This example is an iconic architectural masterpiece, partially embedded into a Swiss mountainside and topped with a grass-covered roof. It appears as though carved from the local Vals quartzite, creating a cave-like sanctuary of water, light, and stone that feels both ancient and contemporary. The design employs monolithic stone slabs, carefully placed openings, and shifting light to evoke the experience of a grotto, seamlessly integrating with the surrounding landscape while offering a meditative, multi-sensory journey through its pools and spaces. Visitors move through a labyrinth of interconnected areas, each with varying temperatures, sounds, and light, guiding them on an unhurried, introspective exploration.

1. The Barossa Hotel adopts a similar siting strategy by 'carving' into the hillside—up to 7 metres deep—to reduce the apparent visual bulk when viewed from the rear (south), while preserving expansive views to the front (north).
2. The use of narrow slit openings strategically positioned windows, and light-reflecting water elements in the Therme Vals create dramatic, ever-changing atmospheres and moods. The Barossa Hotel adopts similar design strategies, employing carefully placed windows to frame glimpsed views, narrow vertical openings within circulation routes to subtly register the time of day, and a palette of raw and refined natural materials that echoes the utilitarian materiality characteristic of traditional Barossa buildings

The design team refers the Design Review Panel to the highly regarded ESO Hotel at Cerro Paranal (or Residencia) in Chile by Auer+Weber+Assoziierte and Hernán Marchant as a precident.

The ESO Hotel is the on-site accommodation complex for staff working at the Paranal Observatory in Chile's Atacama Desert. It is not a commercial hotel - it is more like a remote short-term research residence for astronomers, engineers, and visiting teams - however its functions are similar.

Similar to the Barossa Hotel design strategy, the building is conceived as a singular, horizontal, low-profile form embedded within the landscape. It is carefully set into the low surrounding hills to preserve the desert horizon and long-distance views from the front, while simultaneously minimising its visual presence from the rear. https://divisare.com/projects/257641-auer-weber-roland-halbe-eso-hotel-cerro-paranal

Item : Site movement strategy and arrival experience

The Design Team appreciates your acknowledgment of the challenges associated with incorporating the required technical infrastructure on the site and the intent to keep the creek line free of vehicular traffic with the view to achieving an immersive landscape experience.

While the proposed planning has been reviewed and approved by both the Client and, critically, the IHG Global Design Manager and operational engineers to ensure functional performance, we propose to further explore opportunities to minimise overlap between guest and service traffic during the design development phase. This review will examine circulation patterns, entry and exit points, and service access routes to ensure both safety and efficiency.
The process will be undertaken collaboratively with IHG, incorporating their expertise and insights into guest experience priorities. The goal is to optimise movement throughout the site, reduce potential conflicts, and maintain a seamless and high-quality experience for guests, while ensuring service operations remain discreet and efficient. By taking this collaborative,

detailed approach, the project aims to achieve an outcome that balances operational functionality with exceptional guest experience.

The site movement strategy has been developed to minimise the extent of bitumen road across the site, thereby maximising areas available for landscape, guest amenity, and vineyard. A further preference is to limit creek crossings to a single crossing on the western side of the site. This approach requires a shared access strategy, whereby guest and service vehicles enter the site via the same entry point. Guest vehicles proceed to the porte cochère along a tree-lined boulevard, while service vehicles diverge into a discreet, screened service area to the rear of the site. The dramatic “guest arrival reveal” is intentionally delayed until guests pass through the front entrance lobby.

This movement strategy has been developed in collaboration with the IHG Global Design Manager, following consideration of several alternatives, and is therefore the preferred solution.

The design of the fire egress stairs to the south of the building is still under development; however, the intent is for these stairs to serve both day-to-day guest circulation and emergency egress requirements.

Item : Landscape and pedestrian movement

Showcasing viticulture is a central design principle of the project, reflecting the importance of integrating the site’s vineyard character into the guest experience. However, this must be carefully managed to ensure that no biosecurity risks are introduced or amplified. All design and operational measures will be developed to protect the vineyard from pests, diseases, or other threats, while still allowing guests to experience and engage with the viticultural landscape in a safe and immersive way. This approach balances the project’s aesthetic and experiential goals with the practical requirements of maintaining a secure and healthy vineyard environment.

The design intent is to ensure that all plant and equipment are discreetly located or effectively screened from the view of hotel guests, maintaining the aesthetic quality and guest experience throughout the property. This includes careful consideration of visual, acoustic, and operational impacts to ensure that service elements are unobtrusive while remaining fully accessible for maintenance and operation. Detailed strategies for achieving this, including specific screening methods, landscaping integration, and equipment placement, will be developed and refined during the Design Development stage of the project in collaboration with the project team and relevant stakeholders.

The wayfinding and signage strategy will be developed in the subsequent stages of the project, with a focus on creating clear, intuitive, and accessible guidance for all visitors. While suggestions have been made to incorporate interpretive elements along pedestrian paths, it is critical that any such features are implemented with full awareness and respect for the cultural sensitivities identified during our walk on country with KYAC representatives. This ensures that the project’s design respects and celebrates the heritage and traditions of the local custodians without compromising cultural integrity.

Material selections throughout the project, including interior finishes, landscaping elements, and signage, will be carefully informed by the site’s cultural heritage. This approach seeks to create a cohesive design narrative that reflects and honours the local context, providing an authentic and culturally sensitive experience for guests while integrating seamlessly with the overall architectural and landscape vision.

By combining thoughtful wayfinding, culturally respectful interpretive elements, and heritage-informed material choices, the project aims to balance functional clarity, visitor engagement, and deep respect for the site's cultural significance.

Item: Environmentally Sustainable Design (ESD) and materiality

The Design Team acknowledge and appreciate support for the early engagement of our ESD Consultant to inform key design decisions. Multiple ESD workshops have been undertaken with key items agreed for further exploration during Design Development. Some of these include:

1. All electric building
2. Reduction in embodied energy compared with standard practice
3. Energy efficiency
4. Water conservation, storage and re-use on site
5. Solar power and batter storage
6. Provision of facilities for EV's
7. Provision of opening façade to all rooms for fresh air
8. Waste reduction, recycling and on-site composting
9. North facing facade, minimal east/west facing façade
10. Embedding into the site to achieve thermal stability
11. Double glazing
12. Use of stone harvested from site

The overall sustainability strategy, including the design of the HVAC system, is still under development. Both the Client and Operator are fully committed to reducing greenhouse gas emissions, while also balancing the need to minimise operational costs through efficient energy use. The ongoing design process will prioritise solutions that achieve both environmental and economic performance, ensuring the building operates sustainably without compromising functionality or comfort.

The walls identified as off-form concrete serve a primary structural function, providing the necessary strength and durability for the building. The choice to form these walls from rough-sawn timber reflects the project's commitment to the utilitarian use of materials and embodies the overarching design principle of 'rough to refined,' which defines both the interior and exterior material palette. This approach creates a dialogue between raw, tactile surfaces and more polished, refined elements, reinforcing the building's architectural narrative.

The exposed concrete surfaces are intended to interact naturally with their environment, gradually capturing moisture, dust, and light to develop a subtle, organic patina over time. This evolving texture enhances the sensory experience of the space and contributes to the building's sense of authenticity and material honesty. By embracing the natural aging process of the materials, the design celebrates imperfection, impermanence, and the richness of tactile, sensory engagement, creating a space that feels both grounded and thoughtfully curated.

Item: Internal Layout

The corridor lengths, averaging approximately 80 m with a maximum of 100 m, are a deliberate outcome of multiple critical design considerations. First, the arrangement ensures that all guest rooms benefit from northern views, which offer the highest quality outlooks and natural light, whereas southern views are less desirable. Second, maintaining these corridor lengths allows the building to be kept at a lower overall height; reducing corridor lengths would require additional floors, resulting in a taller building that would have a greater visual impact and potentially compromise the project's integration with the site. Third, the corridors facilitate a centralised organisation of common guest amenities and back-of-house services, optimising operational efficiency and creating a clear and legible spatial hierarchy.

baukultur

Creating further opportunities for guests to engage with the northern side of the building, similar to design strategies seen in the Kandalama example, would necessitate much longer corridors (up to 240m in the Kandalama example). Such lengths would be impractical for guest circulation and operational functionality.

The Client, IHG Global Design Managers, and the technical team are fully aware of the corridor lengths and their implications. While shorter corridors would naturally be preferable, all stakeholders agree that the current configuration is entirely serviceable. Importantly, the benefits of providing high-quality views to every room and reducing the overall building height significantly outweigh the trade-off of longer travel distances. This approach represents a careful balance between guest experience, operational efficiency, and architectural integration with the site.

Summary

The Design Team wish to thank the Design Review Panel for their time, constructive suggestions, and recommendations aimed at improving the design of the Southern Barossa Tourism and Winery Project. All suggestions and recommendations have been carefully considered by the design team and reviewed with the client. Where proposals were deemed to provide a positive contribution, were feasible, and appropriate to the project's objectives, they have been incorporated into the design.

Following this process of evaluation, a number of suggestions were not adopted due to considerations relating to hotel operations, biosecurity, impacts on vineyard operations, potential negative effects on culturally sensitive areas, bushfire risk management, economic viability, or differing architectural perspectives.

Yours sincerely,

Chris Watkins
Director
Baukultur

Cc George Economou
Cc Rebecca Thomas, Ekistics

APPENDIX 4

Flora and Fauna - Response Letter : Succession Ecology

Succession Ecology Document Reference: ES0126-08

Succession Ecology
ABN: 56 605 880 028
1/938 South Road
Edwardstown, SA 5039

28 January 2026

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Glenn Christie
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Phone 0409 282 096

Nick Argyros
Project Director, Australia
Turner & Townsend

Response to public comment – Threatened Flora and Fauna assessment

Dear Nick,

A public submission on the Southern Barossa Winery and Tourist Accommodation Project (SBWTAP) included commentary about the adequacy of the ecological surveys undertaken to date.

Succession Ecology performed a desktop and field assessment of the SBWTAP Project area to assess its ecological values and substantiate the Preliminary Flora & Fauna Assessment Report (PFFAR), which was prepared to support the Development Application. The objective of our report was to provide an overview of the ecological constraints and opportunities posed by the site that may affect the development. The commissioned scope of work did not include targeted surveys for threatened flora or threatened fauna species.

Briefly stated, the PFFAR found that, from an ecological perspective, the project area was suitable for development. This conclusion derived from our desktop and field assessments. The desktop assessment included extracting relevant ecological records from state and federal databases, reviewing relevant reporting and remote sensing imagery, and preparing initial vegetation mapping. The field survey included observations of flora and fauna across the 21.5-ha site, most of which is planted to grapes. Although some trees of high ecological value occur on site, particularly large River Red Gums along a watercourse, impacts to them could easily be avoided. In fact, the preliminary concept drawings indicated no need for their removal. The project area was also noted to offer opportunities for ecological improvement. These opportunities included controlling invasive exotic weeds, fostering native trees and shrubs, and bolstering amenity values. In this way, the SBWTAP has the potential to increase ecological value and biodiversity in the project area if ecological recommendations are implemented.

The commentary referenced above did not take into account the desktop assessment performed prior to the ecological site investigations. The desktop assessment noted that eight of the threatened fauna species were likely or highly likely to use habitat in the area. However, this number does not account for the siting of the proposed development, which is almost entirely in agricultural land and not expected to impact any of the high-value trees on site. Given the siting, only one species was deemed potentially impacted by the development.

This potentially impacted species is Grey-headed Flying-fox (Pteropus poliocephalus; GHFF) is listed as Vulnerable under the Environment Protection and Biodiversity Conservation Act 1999 (Cth; EPBC Act). It was deemed possible that this species may be impacted by the proposed development. As a result, Succession Ecology was additionally commissioned to prepare a EPBC Self-assessment, which addressed this and other Matters of National Environmental Significance, all of which are protected under the EPBC Act. A Significant Impact Assessment was undertaken to evaluate the potential for impacts to GHFF, with the outcome that there is not a “real chance or possibility” for a Significant Impact. The assessment found that the proposed action will have negligible impacts on individual GHFF, and no impact upon any Nationally important GHFF camp, such as the one in Adelaide’s Botanic Park. Therefore, no federally threatened fauna species was considered likely to be impacted by the development.

Similarly, none of the 35 threatened flora species that were assessed were deemed likely to use habitat in the area. Therefore, no threatened flora species was considered likely to be impacted by the development. Both the PFFAR and the public submission noted that the timing of site investigations was suboptimal for the detection of threatened orchid species. However, the desktop assessment found that no orchid species was deemed likely to occur in the Project area, and few orchid species persist in any landscape that has been transformed for agriculture.

Given the low risk of impacts to any threatened fauna or flora species due to the condition of the site and the footprint of the proposed development, it is reasonable and appropriate that the baseline ecological survey was not replicated seasonally, and that no targeted threatened species surveys have taken place.

Cordially,
Dr. C. E. Timothy Paine
Ecology Team Manager
Succession Ecology

APPENDIX 5

Sustainability Strategy - Response Letter : Dsquared

Attention to:
Ryan Moyle
Senior Associate
Ekistics

21st January 2026

Dear Ryan,

Re: Southern Barossa Winery and Tourist Accommodation Precinct, EIS Response

We provide the following advice in response to queries on the project's Sustainability strategy raised through the EIS Assessment process.

Comment raised by	Comment raised	dsquared response
DEW	*Suggest also consider undertaking an assessment of embodied greenhouse gas emissions arising from the construction of the infrastructure and identify emissions minimisation approaches in this area.*	References to embodied carbon were omitted from the EIS Assessment Criteria prior to lodgement of the EIS submission, and therefore this matter was not specifically addressed in the EIS submission. The EIS Assessment Criteria are instead focussed on operational carbon emissions, and the project has responded by incorporating a range initiatives to reduce its operational carbon emissions compared to a standard practice development, which are described and demonstrated in the EIS submission.
Public consultation	*EIS does not adequately address whether additional large-scale tourism development aligns with genuine sustainability or climate adaptation principles.*	Please refer to the Sustainability Strategy Report included in the EIS submission which describes the project's holistic approach to sustainability and the initiatives to reduce its operational energy, greenhouse gas emissions, water use, waste, and environmental impacts compared to a standard practice development. The project's climate adaptation principles are described in Appendix A of the Sustainability Strategy Report included in the EIS submission. This describes the detailed risk assessment that was undertaken by the project team and the resultant mitigation measures that have been included in the project to improve its resilience to future climate change. The project's response is in line with best practice climate change resiliency design response.

We trust these responses adequately address the queries raised, but if you require any further information please let me know.

Yours sincerely,

Jarrad Braham
Associate
jarrad@dsquaredconsulting.com.au

APPENDIX 6

Wastewater - Technical Memorandum : Fluid Environmental

EIS Response prepared by Fluid Environmental
27/01/2026

This document has been prepared for Turner & Townsend in response to matters raised following the EIS for the Southern Barossa Winery and Accommodation Project. Specifically, this covers matters raised that relate to the wastewater treatment, storage and beneficial reuse of treated wastewater.

This should be read in conjunction with the Fluid Environmental Pty Ltd (2025) LCA for Wastewater Treatment Design and Reuse at Barossa Hotel - Lyndoch Report.

Agency	Details of Issue
Barossa Council	*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.* **Response:** The ABSORBS™ system as proposed is a lined system for the treatment and reuse of treated water. The setback distance for the Lined ABSORBS™ is 10m from a water course and on land above 1 in 10year flood level (SA Health Code (2013) Appendix B Tabe B1 setbacks for devices and treatment system components) The detailed design will comply with these requirements
Barossa Council	*More detailed information in relation to the dimensions of the ABSORBS bed should be provided.* **Response:** Each ABSORBS™ is (2 x) 60m x 12m or ≈1400m^2. The ABSORBS™ will be constructed in accordance with the SA Health approval (currently under review). Detailed design of the ABSORBS™ will be included in the application to Health in accordance with SA Health Code (2013). The opportunity to further treat the winery wastewater (polish) through the ABSORBS™ has been raised. This can be done with a 21% increase in the size of the ABSORBS™ Filter. This discussion will be had and if it is deemed advantageous from an environmental protection perspective this will be included in the detailed design. Final configuration of the ABSORBS™ will be completed following a detailed site survey.
Barossa Council	*A soil category should be confirmed in relation to the evapotranspiration of the ABSORBS bed.* **Response:** Soil Category will be established as part of the LCA to be undertaken over the irrigation area (dispersal area), a requirement of the SA Health Code and Application. It has not been undertaken at this point as it doesn't affect preliminary design.
Barossa Council	*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.* **Response:** The methodology used is based on expected use and occupancy of the site. The calculation of BOD_5 and Hydraulic loading has been done in accordance with the SA Health On-site Wastewater Management Code (2013) Appendix E. This is the approved method under the Code and will be reviewed by SA Health through the wastewater application and approval process. Calculation of the wastewater load was prepared by Lucid Consulting Australia.
Barossa Council	*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.* **Response:**

	There is no regulatory requirement to separate the waste streams (Recycled Water (RCW) and treated winey water). The SA Health Code (2013) does not require separation. The soils will be assessed see BC3. All wastewater setbacks have been considered and met, see BC1.
Barossa Council	*Council does not typically approve water balancing methods as they are not generally accepted in South Australia.* **Response:** It is not clear what Council is refering to when discussing' water balancing methods'. If what is being referred to is the water balance model and the dam storage models Table 10 and Table 13, respectively of the LCA for Wastewater Treatment Design and Reuse at Barossa Hotel - Lyndoch Report. These are mandatory requirements for the design of sustainable recycled water projects. In Section 8 of the WW report it mentions flow balancing, this has been changed to "The conventional wisdom for recycled water projects is that winter storage is required when rainfall exceeds evapotranspiration (EPA Victoria, 2009; Thomas, 1991) for wastewater generation vs irrigation requirement balancing". The SA EPA Wastewater Irrigation Management Plan (2009) (WIMP) requires consideration of "over-winter storage and requirements for flow equalisation, and the mixing of various strength wastewaters prior to treatment/disposal" so not only is balancing accepted in SA it is a mandatory requirement. The modelling of the storage has been undertaken in a 90th percentile rainfall year a further requirement of the WIMP.
Barossa Council	*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.* **Response:** The Wastewater (WW) Application is prepared and lodged with SA Health. If SA Health deem it necessary, they refer the application to the EPA for comment. This project and its WW Application will follow that process and due to the nature and size of the project the application will be referred to the EPA.
	The Odour Impact Assessment only addresses potential odours from the proposed winery operations, with management of winery wastewater identified as being the highest risk. It does not address odour associated with human wastewater from the proposed winery cellar door/restaurant/function centre or the tourist accommodation/restaurant/function centre. *The wastewater treatment systems proposed for the winery wastewater and human-generated wastewater would be enclosed, except for a 10.5 ML irrigation balance storage lagoon. The irrigation balance storage lagoon is a potential source of odours that could affect sensitive receivers.* **Response:** The National Environment Protection (Assessment of Site Contamination) Measure (ASC NEPM) does not limit testing *only* to what is immediately obvious. Rather, it focuses on identifying **potential** contaminants based on a site's history (sampling what is "likely" to be present) while also considering potential health and aesthetic risks, including odour, if they are triggered by site investigations Schedule B4 Site Specific Health Assessments Furthermore, Part 4 of the Ambient Air Quality (NEPM) which addresses pollutant monitoring, allows flexibility in choosing what to monitor at each station (i.e., not all pollutants at all stations) based on the likelihood of relevant concentrations. Odours are not expected to be an issue (see below) and there are simple mitigation strategies if odours are identified as problem. The position taken is that air quality impact assessment is not required, that self-assessment will be undertaken during the commissioning phase of the treatment and storage systems and continued as part of the programmed maintenance of the system **Human Wastewater Treatment System.**

Fluid Environmental has installed over 100 ABSORBS™ systems and without exception there has been no odour problems on these sites. These installations have ranged from 30m^2 (≤900L/d) to 6132m^2 (275,000L/d). The system has been selected due to its low operational and maintenance cost and odour generation. The system is well understood not to produce odours.

This was an important issue for the developers: to demonstrate to them that odours are not an issue they were taken to a function centre site in the Adelaide Hills to a 300m^2 ABSORBS™ installation and asked to assess the odour while standing on the system. None of the persons present noticed any odours.

In the 275kL/day system it has been built adjacent (withing 50m) of a 1100person mining camp. There have been no odour complaints and no regulatory requirement for odour assessment. Further to this, over the 100 installations of ABSORBS, there have been no requirement for odour assessment and more specifically no complaint from customers.

Yes, an odour assessment has been undertaken for the Winery Wastewater SBR plant. There is good reason for this as SBR plants have large aeration requirement where by odours can be released through the aeration process. Further to this the Winery Wastewater will have a much larger organic load, that is often responsible for odours.

Understand the risk:
The risk of odours for the ABSORBS™ WW treatment system are negligible. Any odour assessment would not produce an outcome.

Mitigation strategy:
However, if in the event odours are found in the future then charcoal filters can be added. The venting of the treatment system is through 100mm DWV pipes with whirly caps. These can be fitted with the filters without cost penalty.

Wastewater Storage Dam
The storage dam will not develop odours. The experience with stored treated water provides that odours will not be an issue.

2 examples to support the dam will not be a source of odours.

1. As part of the Reclaimed Water Research Project (University of Adelaide and CSIRO) on the Northern Adelaide plains dam water was sampled and tested from 10 locations across the NAP, first Monday of each month for 12 months. There were no odour issues that arose from treated recycled water stored in the WRSV balance storage after weir 5 and from any of the on-farm dams.
2. The 275kL/day miming camp treatment plant is arguably the best example of comparable treated wastewater storage. The treatment train is the same as the one proposed for The Barossa Hotel. There are no odours from the dam. There are two likely sources of odour from dam storage:
    - From the treated human wastewater, and/or
    - From eutrophication of water in the dam due to high nutrient load.

   Neither of these are likely due to the treated water quality as shown below.

Water Quality data form the 275kL ABSORBS™ System

Water Source	TSS mg/L	Turbidity NTU	NH4-N mg/L	TKN mg/L	Org. N mg/L	TN mg/L	TP mg/L	BOD mg/L	COD mg O2/L	FOG mg/L
ABR influent	560	500	68	92	24	92	14	630	1000	110
ABR effluent	76	50	77	89	12	89	14	250	420	<10
Post ABSORBS	10	0.66	0.031	11	11	75	2.5	10	20	
Final Water Qua.	10	0.41	0.051	11	11	75	2.7	5	20	
ABR effluent Red.	**-86%**	**-90%**	**13%**	**-3%**	**-50%**	**-3%**	**0%**	**-60%**	**-58%**	**-91%**
ABSORBS Red.	**-87%**	**-99%**	**-100%**	**-88%**	**-8%**	**-16%**	**-82%**	**-96%**	**-95%**	
Total System Red.	**-98%**	**-100%**	**-100%**	**-88%**	**-54%**	**-18%**	**-81%**	**-99%**	**-98%**	

Understand the Risk
The risk of odours emanating from the dam is negligible due to i) the treated water quality and ii) the location of the dam in relation to on-site or off-site sensitive receptors. It can be seen that there is adequate oxygen in the ABSORBS™ treatment system due to 99% reduction on BOD_5 and the 100% oxidation of Ammonia to other forms of nitrogen.

Mitigation strategy:
However, in the event odours are found in the future, the most appropriate mitigation strategy is aeration stopping anoxic conditions developing and increasing water turbulence. This can be retrofitted with very little effort as there will be power at the dam for irrigation pumps.

Note: the two mitigation strategies discussed can be installed without significant cost impact over and above that which would be incurred during construction.

EPA

It is stated in the Odour Impact Assessment that after treatment in the Sequencing Batch Reactor, the clarified water would be transferred to a buffer tank before being passed into the ABSORBS system for removal of any remaining fine solids. It would then be transferred to a 10.5 ML irrigation balance storage lagoon. In contrast, the report, LCA for wastewater treatment design and reuse at Barossa Hotel (27 June 2025) (the 'Wastewater Treatment Design and Reuse report'), prepared by Fluid Environmental Pty Ltd, states that the treated winery wastewater would be transferred directly to the irrigation balance storage lagoon to be mixed with the treated human generated effluent. The Wastewater Treatment Design and Reuse report does not propose that the treated winery wastewater would pass through the ABSORBS system.

The EPA seeks clarification as to whether the treated winery wastewater would be passed through the ABSORBS system. If not, then clarification is sought about the impact on the quality (particularly BOD) of the treated wastewater to be transferred to the irrigation balance storage lagoon.

Response:
The target water quality from the Winery Water Treatment System is < 30BOD_5 and < 30TSS. This is the requirement for the treatment of human wastewater, AS1546.3 STS for secondary treatment and albeit it is higher than the organic load from the ABSORBS™ system. It represents <4% of the total water and therefore will not negatively impact total water quality.

EPA

The Odour Impact Assessment did not address human-generated wastewater. Given that most of the wastewater produced at the Southern Barossa Winery and Tourist Accommodation Project would be human generated wastewater, the potential air quality impacts should be assessed to meet Assessment Requirement AEQ1

Response:
We have undertaken a number of larger scale ABSORBS™ wastewater systems that required EPA approval including

- Yalata Aboriginal Community (75kL/d, 26.0kg BOD_5/d)
- Adelaide Hills restaurant (12kL/d, 9kg BOD_5/d)
- Point Boston (109kL/d, 36kg BOD_5/d))
- McLaren Vale (to be installed Feb 26 49.8kL/d, 24.0kg BOD_5/d)
- Aldinga Beach (30kL/d, 23.1kg BOD_5/d)
- Edinburgh for Renewal SA (8.4kL/d, 5.6kg BOD_5/d)

None of these developments required an AEQ1 odour assessment. It therefore feels onerous to require an assessment for this site at this time. Due to the high level of confidence in the proposed system design and the mitigation strategies proposed we feel that an odour assessment is not required at this point.

EPA

It is stated in the Wastewater Treatment Design and Reuse report that the ABSORBS system can achieve a 24% reduction in nitrogen, however the Arris website suggests a 21% reduction is achieved. For a 24% reduction to be assumed for this development, the testing results should be provided.

Response:
The ABSORBS™ treatment system is continually being researched and compliance tested at the Handorf Compliance Testing Facility (SA Water). As a result, there is constantly further updated information being generated. The 24% quote is the latest result from compliance testing for the ABSORBS™ system hydraulic and organic loading rates. It can be seen in the water quality data provide in EPA1 that nitrogen reduction is 18%. Irrespective of the level of Nitrogen reduction there will be a crop nitrogen deficit.

It can be seen in Table 15 of the LCA for Wastewater Treatment Design and Reuse at Barossa Hotel - Lyndoch Report in the nutrient removal table that there is a deficit of 1449kg of nitrogen. Meaning there is a shortfall of applied nitrogen to the cropping system that will require supplementary nitrogen as part of the vineyard management maintenance of 'good crop health' for the lucerne.

	If the worst-case scenario is assumed, no nitrogen is removed by treatment, there will be an additional 510kg of nitrogen for crop production, still << the 1449kg deficit. The vineyard agronomist/manager will use best practice water quality analysis and petiole analysis to balance nitrogen requirement. Nitrogen will largely be a post treatment management issue, but, the proposed nitrogen management across the treatment, storage and crop production is sustainable.
EPA	*It is not clear how the lucerne would be irrigated to ensure that occurs. For example, how would the subsurface irrigation occur underneath the lucerne, as well as the vines (particularly given the vines are already well established)?* **Response:** It is common practice for interrow groundcover/crop production and vineyard operators to have row planters. The soil will be prepared and before planting lucerne, drip irrigation will be installed below the cultivation level for inter row cropping. Lucerne will then be planted. The irrigation design will be undertaken in the detailed design works for the project.
EPA	*SA Health's On-site wastewater systems code (2013) requires that irrigation of treated effluent occur more than 50m from the watercourses that traverse the site and any bore on the site. Details regarding the location of the irrigation areas suggest the minimum setback distance from watercourses will not be achieved.* **Response:** The ABSORBS™ water treatment system sighting has been discussed in BC1. The Lined ABSORBS™ is 10m from a water course and on land above 1 in 10 year flood level (SA Health Code (2013) Appendix B Table B1 setbacks for devices and treatment system components). For the safe and sustainable irrigation of the cropping system the decision has been made to treat water and disinfect water to a quality that allows it to be used as recycled water not treated wastewater. **In doing this, it alters the setbacks required**. The wastewater team are working with SA Health on the Log Reduction Targets and the treatment train to minimise setback requirements. As an example: the SA Health (1999) Reclaimed Water Guidelines state that for Class A RCW no specific setbacks are required. Classes B, C and D have greater setbacks for spray irrigation of 30, 50, and 100m respectively for spray irrigation. The Australian Guidelines for Water Recycling: Managing health and environmental risks (2006) provide a balance between treatment and on-site controls to ensure the safe (human and environmental) and sustainable irrigation. We will be establishing the LRVs required for irrigation with minimal setbacks. This will be established in the risk-based assessment for irrigation of RCW and setback requirements and will be part of the SA Health Approval. This approach has been taken being aware of setback distances for treated wastewater and RCW.
EPA	*Explain where and how chlorination of the human-generated wastewater would occur on site* **Response:** There are a couple of accepted methods for chlorination of treated wastewater from the ABSORBS™ including contact chlorination and dosing with sodium hypochlorite. Either of these methods are approved by SA Health and method will be included in the detailed design to SA Health. The chlorine contact chamber can be seen in Figure 2 Wastewater design concept, layout and site plan (LCA for Wastewater Treatment Design and Reuse at Barossa Hotel - Lyndoch Report). Chlorination will be undertaken in the ABSORBS™ collection tank and pumped to the CT Tank with an inline static mixed to ensure chlorine mixing. The CT tank has been sized using the US EPA Disinfection Profiling and Benchmarking Guidance Manual (EPA 815-R-99-013, 1999). The calculation for sizing was for an unbaffled tank with a flow rate residence time that meet the require CT.
EPA	*Explain how swimming pool backwash water is to be managed, if it cannot be directed to the ABSORBS system.* **Response:** Provided by MLEI: "Summary of proposed pool water management approach • Filtration system: Ultra-Fine Filtration (UFF) is proposed, which does not require backwashing.

	• Black water (filter dumps): Small volumes only; to be discharged to sewer (or equivalent) at a restricted rate, subject to review and confirmation by the services consultant (Lucid). – To the ABSORBS • Grey water (TDS bleed-off): Classified as grey water and potentially suitable for reuse, subject to services consultant review and approval. • Quantities: Final discharge and reuse volumes will be confirmed during detailed design. Following the identification of the volumes of filter dumps have been established it will be included in the overall project wastewater balance model. It will be included in the application to SA Health.
EPA	*Explain how the storage dam would be constructed as per the guidance contained in the EPA's Wastewater Lagoon Construction guideline (2019).* ***Response:*** *This question is somewhat asked and answered. The designers are well aware of the Wastewater Lagoon Construction Guideline (EPA 509/2019) the dam will be constructed in accordance with this guideline. It is likely that the dam will have a 2mm HDPE Liner.* *Final detailed will be in the detailed design for the wastewater system.*
EPA	*Explain how surface runoff would be prevented from entering the storage dam, e.g. constructing diversion bunds or swales.* **Response:** The cheapest way to build dam storage is to dig down and use that spoil to build banks. As the banks are higher than ground level this mitigates the risk of runoff entering the recycled water storage dam. This will be covered in the detailed design.
EPA	*Explain how potential odours from the dam would be managed and if an aerator would be installed in the dam* **Response:** See EPA1 odours have been discussed in that response
Public Consultation Matters	*Suggests missing data in EIS on estimated water usage for the development* **Response:** The volume of generated wastewater is stated in Section 4.1 of the LCA for Wastewater Treatment Design and Reuse at Barossa Hotel - Lyndoch Report. The methodology use is based on expected use and occupancy of the site. The calculation of BOD_5 and hydraulic loading has been calculated in accordance with the SA Health Code (2013) Appendix E. This is the approved method under the Code and will be reviewed by SA Health through the wastewater application and approval process. Calculation of the wastewater load was prepared by Lucid Consulting Australia. The volumes use in the Wastewater Report will be used in the wastewater Application to Health.
Public Consultation Matters	*Air quality and odour survey is missing* **Response:** Covered in EPA1
Public Consultation Matters	*Previous advice suggests 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 and that the annual usage is 11.77ML: Action: Review this apparent discrepancy and provide advice accordingly on how any shortfall (if real) will be managed.* **Response:** As a point of clarification, the potable water to be used for this project will by supplied by SA Water. What this means is that any wastewater and therefore treated recycled water will not be supplied from groundwater resources. To the contrary as the recycled water is a 'new' resource it will likely mitigated the requirement for ground water abstraction for irrigation therefor having a positive impact on the aquifer rather than the negative risk put forward. It is incumbent on us to assess and model environmental impacts honestly, fully and truthfully when undertaking assessments. The SA EPA states "It is an offence under the legislation to provide false or misleading information (whether by inclusion or omission) to a site contamination auditor or consultant who is preparing a report in relation to site contamination". The discussion on Excess Water (in the "Preserve and Protect Barossa" document) is incomplete and in the case under discussion incorrect. At best it is a back of the envelope calculation of crop water

demand. The proponent states the Barossa vineyards apply on average 1.1ML of water. Albeit this number may be correct there will be a bell curve of irrigation rates used in the Barossa. The proposed irrigation rate applied to this project will fit that bell curve. That is to say that 1.1ML of irrigation is not the only irrigation rate that is used in the Barossa.

Note: *Pers. Comm.* Stephen Smith formerly of the Northern Adelaide and Barossa Catchment Water Management Board (NABCWMB) (who worked on the Adelaide and Mount Lofty Ranges Natural Resources Management Board Water Allocation Plan (WAP) Barossa Prescribed Water Resources Area 2009) advised that the origin of the 1.1ML irrigation rate came about from a calculation of the available water (sustainable aquifer yield) divided by the irrigation area for the Barossa. He advised that the 1.1ML/ha came about as a result of the WAP and that growers manage the use of their water according to this limitation. That is to say they use less water in some areas to make more water available in other areas.

The methodology used to assess crop water requirements has used the FAO Irrigation and Drainage Paper 56: Crop Evapotranspiration - Guidelines for Computing Crop Water Requirements (1998) is accepted by the SA EPA and to that end environmental regulators across Australia for estimating crop water requirements.

Using this methodology and in a 90th percentile rainfall year (that is a very wet year) there is adequate area to meet the irrigation requirements. But it is critical that the project does not do environmental harm, in ensuring this it is important to understand the process in undertaking the modelling of crop water demands. There is a discussion of the methodology used from Irrigation and Drainage Paper 56 in the LCA for Wastewater Treatment Design and Reuse at Barossa Hotel - Lyndoch Report, Section 6.3.2.

Further to this the calculation of the generation of wastewater is well laid out in SA health On-site Wastewater Systems Code Appendix E. This table provides the peak wastewater generation for a wide range of development activities. It is important to understand that the code requires the calculation of wastewater to be what is called Peak Design Flow regardless of the actual daily flow.

What does this mean for this project:

- That daily wastewater generation be calculated for the hotel development at 100% occupancy and 100% of the restaurant and other facility use;
- That daily wastewater generation be calculated for the winery cellar door and function centre at 100% of capacity; then
- This conservative daily hydraulic and organic load for each activity is then multiplied by 365 to get the yearly wastewater generation used in modelling dispersal area (irrigation) requirement.

It can be seen that this generates a very conservative estimate of wastewater generation (over estimates) but this is what is required under the SA Health Code and is called Peak Design Flow (PDF). It is this PDF that is used for the design of the wastewater treatment and dispersal system. All will agree that the occupancy of the hotel and/or function centre will not be at 100% every day of the year.

As an example, an 80% wastewater generation would be approximately 21.3ML/a (see below). If the 60% suggested by the resonant to the EIS the annual wastewater generation would be 16.1ML/a. This demonstrates that the average occupancy has a significant impact on the average annual wastewater generation which would be less than the PDF.

Modelled wastewater generation at different Hotel and Winery facility occupancy rates

Peak Design Flow (ML/a)	Venue Use % of capacity	ML/a	ABSORBS (-15%) ML/a
26.4	100%	26.4	22.6
	90%	23.9	20.4
	80%	21.3	18.3
	70%	18.8	16.1
	60%	16.2	14.0
	50%	13.7	11.8

Further to this, the treatment system that has been selected for this development has an unusual design feature in that it had dual zone distribution system. About 15% of the water is dosed to the upper layer of the filter while the balance 85% drains to the lower capture (reuse) infrastructure. This process delivers Advanced Secondary Treatment (AS1546.3:2017) with very low energy input.

The 15% is beneficially used by plants grown over the surface of the filter bed. Alone, this 15% reduction would see the annual wastewater generation to be 22.6ML/a. However, compounding the 80% use of the facility and the 15% beneficial reuse at the ABSORBS filter the net wastewater generation will be <18.3ML/a. Similarly, as discussed above at 60% occupancy annual wastewater generation would be 14.0ML/a.

The calculated Peak Design Flow of 26.4ML/a and the recycled water irrigation of the vineyard and amenity areas is adequate for the beneficial reuse of wastewater with significant buffer when considering actual flows verses PDF. In fact, 18.3L/ is << 22.27ML/a (31% reduction for irrigation and storage for 80% occupancy) calculated in the public response to the FAO Irrigation and Drainage Paper 56 calculated demand. Interestingly, supplementary irrigation would be required to achieve 1.1ML/ha which is the Barossa average irrigation rate.

Importantly, the 18.3ML/a is an irrigation rate of 1.7ML/a for 10.7ha, this rate is not outside of a sustainable irrigation rate for the combined vine and lucerne cropping system as calculated in the WW Report. Neither would the 26.4ML/ha or 2.5ML/ha/a at 100% wastewater generation.

Further to this in the "Preserve and Protect Barossa" document highlights that the development is in a "setting with shallow, stressed groundwater" there is nothing in the taking and use of groundwater for this project that will be outside of the sustainable WAP and licence conditions. Any comment to the contrary about risk to neighbouring properties is fear mongering and not in line with the science used by the NABCWMB in generating the WAP. The WAP also allows for water trading within the catchment indicating that regardless of the location licenced abstraction from the aquifer is sustainable.

The design of the wastewater treatment system as stated in the LCA for Wastewater Treatment Design and Reuse at Barossa Hotel - Lyndoch Report will comply with the Australian Guidelines for Water Recycling: Managing Health and environmental risks (2006) so the claim in "Preserve and Protect Barossa" document that effluent surplus translates into an unacceptably high risk of nutrient, pathogen or chemical contamination is without foundation and incorrect.

The statement *"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*" is a clear indication that Preserve and Protect Barossa do not understand the process. No development will proceed until the wastewater application has been made and approved by SA Health and within that process reviewed by the SA EPA. So simply, no development will proceed without the SA Health approval regardless of any other approval pathway.

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.

Response
The risks highlighted are manageable and will be covered in the SA Health Approval including the recycled water approval under the Australian Guidelines for Water Recycling: Managing Health and environmental risks (2006) where it is a requirement for multi barrier treatment processes to ensure the safe and sustainable beneficial reuse. This includes chlorine, and UV disinfection and there will be significant disinfection within the storage lagoon.

It might be advisable that the Preserve and Protect Barossa group pay a visit to the Willunga Basin Water Company with vineyard irrigatin using recycled water to understand the real risk and not some theoretical risk!

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.

In another wastewater application within the Barossa with Andrew Solomon from the EPA he advised that they do not have the capacity to enforce the installation of monitoring bores and then review the ongoing monitor the data. Adequate protection will be included in the approval application to SA Health and reviewed by the EPA.

It is important to understand that the risk from this irrigation project is no greater than the risk from irrigation of ground water directly to grapes. The Willunga Water Company and the Virginia Pipeline Scheme (VPS) have had >25years operation without significant sustainability issues. It is important to understand that it is easy to highlight some theoretical risk/s but to look at it clearly, scientifically and without prejudice, there are a number of matters that help understand the risks:

- The irrigation risks are not greater that if vines were irrigated on site with groundwater;
- The groundwater abstraction is in accordance with the Barossa WAP where acceptable risk has been assessed by the NABCWMB and contained withing the licence and transfer conditions;
- Being that recycled water is being used, part of the licence conditions will include water quality monitoring and reporting to SA Health;
- The EPA will require that a Wastewater Irrigation Management Plan where recycled water risk management plan (RMP) is also required;
- In the first 18years of the VPS a Wastewater Irrigation Management Plan Report was prepared annually to SA Health, SA EPA, and Water Reticulation Systems Virginia to meet licence conditions;
- The irrigation of 26.4ML although not insignificant, however, it is not a large undertaking when compared to growers on the NAP taking up to 1GL of water and irrigating at a rate of 8ML/ha; and
- The irrigation density within the greater development area is less than the irrigation density within much of the Barossa further mitigating site specific risks.

The take home message is that the proposed wastewater irrigation is both manageable and sustainable where risks have been assessed. It is important to understand the developers of this project have no interest in having an unsustainable irrigation project on the doorstep of a 5-Star hotel and function facilities.

If further queries arise from the responses included in this document do not hesitate to contact me.

Jim Kelly
Director
Fluid Environmental Pty Ltd

APPENDIX 7

Stormwater & Civil - Technical Memorandum : MLEI

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To	Melody Young Turner & Townsend	**Date**	28/01/2026
From	Anthony Giannini	**Ref.**	A2024-14356
Subject	Technical Memorandum – Civil and Stormwater Management EIS Responses	**Project**	Southern Barossa Winery and Tourist Accommodation Precinct

Purpose of this Memorandum

This Technical Memorandum has been prepared to respond to civil and stormwater related matters raised during the Environmental Impact Statement (EIS) review process for the proposed Southern Barossa Winery and Tourist Accommodation Precinct. The intent of this memorandum is to clarify the basis of the concept-level stormwater management strategy, address the matters raised, and outline how outstanding items will be appropriately resolved during subsequent detailed design phases.

Design Stage Context

The Civil and Stormwater Management Report has been prepared at concept design level, consistent with the purpose of the EIS process. At this stage, the objective is to demonstrate that:

- A compliant and feasible stormwater management solution exists;
- Downstream flood risk and water quality impacts can be appropriately managed;
- No critical civil or hydrological constraints exist that would prevent development approval.

A number of matters raised in the EIS review relate to detailed design, contractor methodology, or operational maintenance, which are not typically developed or finalised at the concept design stage, nor should form a part of the EIS review process. These items will be addressed during detailed design, construction documentation, and operational phases, as appropriate.

Response to Key Stormwater and Civil Issues Raised

Discharge to Watercourses and Pollution Concerns

Concerns have been raised regarding stormwater from the development discharging directly into existing watercourses and the potential for pollution.

The concept design adopts a multi-layered stormwater treatment train, including:

- Rainwater harvesting tanks capturing roof runoff;
- Bioretention swales within developed areas;
- Vegetated retention basins providing both flow attenuation and water quality treatment.

Stormwater discharge to watercourses is unavoidable for a site of this scale and topography, and the proposed discharge methodology is consistent with best-practice water sensitive urban design

(WSUD) principals. Importantly, stormwater is treated prior to discharge and peak flows are controlled. The suggestion that all site runoff should be fully contained without discharge is considered extreme and unreasonable, particularly given the rural context and the existing natural drainage function of the site.

Detention, Retention and Discharge Reduction Strategy

Concerns were raised regarding the effectiveness of the discharge reduction strategy.

The review comments do not fully acknowledge the distributed retention volumes proposed across the site, including:

- Retention storage within detention basins;
- Retention provided by rainwater tanks.

In addition, it has been demonstrated that peak flows will not increase during design rainfall events due to changes in time of concentration resulting from drainage formalisation, avoiding cumulative flows. Concept-level DRAINS modelling indicates that post-development peak flows at the downstream Hoffnungsthal Road culvert are maintained at or below existing conditions, with modelling demonstrating that peak hydrographs do not coincide with upstream catchment peaks. This provides a net reduction in downstream flood risk.

Design solutions also exist for worst-case scenarios, including culvert blockage, inlet failure, and back-to-back rainfall events, and will be assessed in detail during the detailed design phase.

Performance of Retention Basins

Concerns have been raised regarding the performance of the proposed retention basins, including assumptions relating to soil infiltration characteristics and their influence on basin performance.

At the concept design stage, basin sizing, locations, and storage volumes have been developed on a conservative basis to demonstrate feasibility and compliance, without reliance on infiltration to achieve critical flood mitigation or discharge control outcomes. The proposed basins are designed to function effectively as detention and retention systems under low-infiltration or worst-case soil conditions, with controlled outlet structures governing discharge rates.

Soil infiltration rates across the site have not yet been confirmed through detailed field testing, which is appropriate for the current stage of design. Targeted infiltration testing and geotechnical assessment were always intended to be undertaken during the detailed design phase to refine basin performance, water quality treatment behaviour, and drawdown times. These investigations will inform final basin geometry, lining requirements (if any), and vegetation selection but do not represent a constraint to concept approval.

There is no identified dependency on high soil permeability for the proposed stormwater strategy to operate effectively. Accordingly, uncertainties associated with soil infiltration assumptions do not present a risk to downstream flood protection or compliance with discharge criteria at this stage of assessment form a peak flow perspective.

Maintenance of Bioretention Swales and Basins

Concerns relating to long-term maintenance requirements have been raised.

While maintenance considerations inform design, operator maintenance practices are not a determining factor for development approval. The proposed bioretention swales and basins represent standard, widely adopted WSUD infrastructure with well-established maintenance regimes.

Maintenance responsibilities will be addressed through the project's operational management plans and asset ownership arrangements. As such, maintenance considerations should not carry undue weight in the assessment of development feasibility at the EIS stage.

Similarly, concerns regarding optimistic assumptions around Council-owned drainage infrastructure maintenance fall outside the scope of the proposed development and should not be attributed to the project.

Surface Water Interaction with Wastewater Dams

Concerns regarding surface water entering wastewater dams are acknowledged.

The detailed design will allow for physical separation of surface water drainage systems from wastewater infrastructure through:

- Finished surface grading;
- Drainage diversion measures;
- Bunding and freeboard allowances where required.

Detailed design will confirm final levels and protection measures to ensure no adverse interaction occurs under both normal and extreme rainfall conditions.

Gaps in Information, Survey and Modelling Assumptions

Some requests for additional information relate to survey extents and data that are unreasonable at the concept stage, including:

- Detailed surveying of downstream watercourses;
- Full survey of large upstream catchments beyond the site control.

The modelling undertaken uses accepted assumptions consistent with available datasets, aerial data, and regional information, which is appropriate for concept design. Further investigations, including detailed culvert surveys, on-site watercourse survey, and soil infiltration testing, are intended to be completed to support detailed design and should not prevent approval at this stage.

Unverified Modelling Outcomes

The modelling outcomes presented are suitable for concept-level assessment and demonstrate that compliant solutions are achievable. Independent peer review of the concept model has been undertaken within MLEI prior to EIS submission. Partial verification is already inherent in the EIS review process and should be undertaken by the EIS reviewer.

Detailed modelling and a further detailed peer-review will occur as a part of the detailed design Phase of the project.

Bulk Earthworks on a Sloping Site

The site's sloping topography has been acknowledged and addressed through a preliminary bulk earthworks strategy demonstrating feasible cut-and-fill outcomes. Detailed earthworks optimisation, balancing, and construction methodology are detailed design or contractor-led activities and will be detailed at later staged of the projects.

No critical earthworks or stability risks have been identified at the concept stage.

Construction Phase Stormwater and Sediment Controls

Several comments relate to construction-phase stormwater and sediment control measures.

Detailed Soil Erosion and Drainage Management Plans (SEDMPs) are contractor deliverables and are not typically developed at concept design stage. The Civil and Stormwater Management Report confirms that appropriate construction-phase controls are intended to be implemented in accordance with regulatory requirements and best practice.

Conclusion

The stormwater management strategy presented within the EIS submission is appropriate for concept design and demonstrates that:

- Flood risk and water quality impacts can be effectively managed;
- Compliant stormwater detention, retention, and treatment solutions are achievable;
- No critical civil or stormwater constraints exist;
- Outstanding matters raised within the EIS submission response can be appropriately resolved during detailed design, construction, and operational phases.

While further investigations and refinements are anticipated, these are typical for a project of this scale and should not be considered barriers to development approval at this stage.

Feel free to contact the undersigned should you have any queries.

Kind Regards,

MLEI Consulting Engineers

Anthony Giannini *MIEAust CPEng NER*
Associate/Senior Civil Engineer

APPENDIX 8

Bushfire - Technical Memorandum :

SA Bushfire Solutions

TECHNICAL MEMORANDUM

Project: Southern Barossa Winery & Tourist Accommodation Project
Client: Turner & Townsend Pty Ltd
Prepared by: SA Bushfire Solutions
Purpose: Response to Public Consultation Feedback
Date: 20 January 2026

Executive Summary

This Technical Memorandum has been prepared to assist the proponent and the planning authority in responding to bushfire-related matters raised through public consultation and agency review for the Southern Barossa Winery & Tourist Accommodation Project.

The memorandum addresses submissions relating to site characterisation, topography, bushfire behaviour, evacuation feasibility, access constraints and proposed emergency management arrangements. It clarifies and corrects specific textual inaccuracies identified in the Bushfire Risk Assessment, provides additional technical explanation regarding slope, fire behaviour and bushfire risk classification, and responds to concerns regarding operating conditions under elevated Fire Danger Ratings.

In particular, the memorandum clarifies the intended operating philosophy underpinning the Bushfire Emergency Management Plan, including:

- proactive site closure and early relocation of occupants on forecast Catastrophic Fire Danger Days;
- a managed, on-site emergency management approach for Extreme Fire Danger Days below the Catastrophic threshold; and
- the role of access constraints, emergency service requirements and Bushfire Safer Places as secondary, contingency measures, rather than default evacuation assumptions.

The memorandum confirms that the Bushfire Risk Assessment adopts a precautionary, qualitative risk framework consistent with contemporary bushfire risk management practice. It further confirms that the proposed emergency management strategy has been developed to prioritise life safety, minimise reliance on unplanned or reactive evacuation, and maintain access for emergency services during fire emergencies.

1. Purpose and Scope

The purpose of this Technical Memorandum is to provide a structured and transparent response to bushfire-related issues raised through public consultation and agency review of the Southern Barossa Winery & Tourist Accommodation Project.

Specifically, the memorandum:

- responds to submissions alleging deficiencies in site characterisation and bushfire risk assessment methodology;
- formally corrects and clarifies aspects of the topographic description used within the Bushfire Risk Assessment;
- explains the basis of the bushfire risk classification and associated mitigation framework;
- clarifies the intent and status of draft operating thresholds referenced in the Bushfire Emergency Management Plan during consultation;
- outlines the approach to site closure, evacuation and managed shelter-in-place under varying Fire Danger Rating conditions; and
- provides context regarding access constraints and the identification of Bushfire Safer Places as contingency measures within broader emergency management planning.

The memorandum is intended to support informed planning decision-making by clearly articulating the technical basis of the bushfire risk assessment and emergency management strategy, while distinguishing between forecast-based, planned responses and incident-specific actions directed by emergency services.

2. Site Identification and Mapping Clarification

All bushfire assessment figures, including Figure 15 – Slope and Aspect, were prepared specifically for the Southern Barossa Winery & Tourist Accommodation Project site at Lot 102 Hoffnungsthal Road, Williamstown. No mapping, slope data or topographic assumptions have been derived from any unrelated site. The incorrect JPEG image was used on the report from a previous assessment and has been rectified.

3. Topographic Description – Correction and Amendment

A sentence within the Bushfire Risk Assessment describing the site as flat with average slopes less than three degrees is acknowledged as overly generalised. This sentence will be formally corrected to more accurately reflect the mapped terrain conditions.

Replacement Text - *"The site is characterised by rolling terrain, with slopes ranging from generally gentle to moderate across the development footprint, including localised steeper areas associated with landform variation and drainage features. Slope mapping indicates a range of slope classes across the site, which have been considered in the bushfire risk assessment and mitigation framework."*

4. Response to Allegations Regarding Risk Validity

The Bushfire Risk Assessment does not rely on a single averaged slope value, nor does it assume flat terrain.

Slope is a recognised factor influencing bushfire behaviour, particularly rate of spread and radiant heat exposure. The site comprises rolling terrain with variable slopes, consistent with foothill Barossa landscapes. Slope expressed in percentage terms within broader project documentation equates to single-digit degree slopes and does not represent extreme escarpment conditions.

The assessment adopts a precautionary, qualitative risk framework aligned with ISO 31000 and the National Emergency Risk Assessment Guidelines (NERAG), resulting in a Very High pre-mitigation risk classification.

5. Operating Conditions – Closure Thresholds and Extreme Fire Danger Days

The Bushfire Emergency Management Plan (July 2025) was submitted as a draft document to support impact assessment and public consultation. It is noted that this draft included discussion of elevated Fire Behaviour Index (FBI) values (≥75) as a trigger for heightened risk consideration and operational decision-making. That draft material was intended to inform discussion with the proponent and regulators and was not a finalised or adopted operational commitment.

Following further review and consideration of site design, construction standards, infrastructure provision and emergency management capability, the operating thresholds proposed in the draft Bushfire Emergency Management Plan have been reassessed in consultation with the project team.

It is confirmed that the revised operating position is as follows:

- Site closure will occur on declared Catastrophic Fire Danger Days, consistent with established best practice in South Australia for high-occupancy uses in bushfire-prone environments. Closure will be implemented in a planned and orderly manner, supported by advance fire weather forecasting and communication, to ensure occupants are relocated off site prior to the onset of hazardous conditions.

- For Extreme Fire Danger Days (FDI 75–99), the emergency management strategy does not rely on default evacuation. Instead, occupants will be managed on site in accordance with the Bushfire Emergency Management Plan and under the direction of the Emergency Control Organisation (ECO), unless changing conditions or a specific, credible threat necessitate an alternative response.

This approach reflects a risk-based assessment that recognises evacuation during Extreme fire weather may introduce greater overall risk than remaining on site, particularly for:

- elderly or mobility-impaired persons,
- visitors unfamiliar with rural environments,
- people with limited English proficiency, and
- large groups requiring coordinated movement under stress.

The site has been specifically designed and will be operated to support this managed shelter-in-place strategy, including:

- Bushfire Attack Level (BAL) 19 construction, providing enhanced resistance to ember attack, radiant heat and flame contact;
- Managed vegetation and defendable space, reducing fire intensity and radiant heat exposure in proximity to buildings;
- Dedicated on-site fire water supply and firefighting infrastructure suitable for defensive use;
- A defined Emergency Control Organisation (ECO) with clear roles, authority and communication protocols; and
- Advance fire weather monitoring, including review of forecast Fire Danger Ratings and fire weather conditions up to four days ahead, enabling proactive planning and escalation of controls.

Under this framework:

- Catastrophic Fire Danger Days and FDI ≥100 trigger proactive site closure and relocation of occupants off site.
- Extreme Fire Danger Days (FDI 75–99) trigger enhanced preparedness, increased monitoring and on-site management of occupants, rather than precautionary evacuation.

This distinction reflects contemporary bushfire risk management principles, which recognise that evacuation is not universally the safest response in all fire weather conditions. Where a site has been purpose-designed, constructed and

managed to reduce bushfire exposure, a managed shelter-in-place strategy during Extreme fire weather may provide a lower residual risk outcome than evacuation along constrained rural road networks.

Notwithstanding the above, all operating responses and emergency management actions (for bushfire) remain subject to real-time conditions and incident-specific advice or direction from emergency services, including the South Australian Country Fire Service.

6. Evacuation, Access Constraints and Single Egress

Public submissions raise concerns regarding evacuation feasibility given the potential for more than 1,000 guests and staff to be present on site during peak periods and reliance on a single vehicular access and egress route.

The Bushfire Risk Assessment and supporting traffic documentation acknowledge geometric constraints at the intersection of Hoffnungsthal Road and Lindner Road, including limitations on the simultaneous passage of emergency vehicles and general traffic, and the restricted ability to significantly widen the intersection due to regulated and/or significant trees.

Emergency management planning for the site is therefore structured to avoid unplanned or reactive evacuation during elevated fire danger conditions. The Bureau of Meteorology provides Fire Danger Rating forecasts in advance, enabling proactive decision-making.

Where a Catastrophic Fire Danger Rating is forecast for the following day, the Emergency Control Organisation will advise guests and staff in advance that the site will be closed and that occupants are required to relocate off site in a calm and orderly manner prior to the onset of hazardous conditions. This planned approach avoids last-minute evacuation and reduces congestion on surrounding roads.

For Extreme Fire Danger Days below the Catastrophic threshold, the emergency management strategy does not rely on evacuation. Occupants will remain on site and be managed in accordance with the Bushfire Emergency Management Plan under the direction of the Emergency Control Organisation. This approach avoids the risks associated with large-scale, unscheduled evacuation along constrained rural roads and ensures that surrounding road networks remain clear for emergency service access and response if required.

Accordingly, reliance on a single constrained egress route informs a risk-based, staged response, where early closure and relocation occur only when forecast conditions indicate that evacuation can be safely and effectively undertaken in advance, and where managed shelter-in-place provides a lower overall risk outcome during Extreme fire weather.

7. Bushfire Safer Places – Lyndoch, Williamstown and Tanunda

Public submissions note that Tanunda is identified in the Bushfire Emergency Management Plan as a Bushfire Safer Place for evacuees from the site and raise concern that this implies reliance on evacuation to a township location during bushfire events.

Appendix 2 of the Southern Barossa Tourism Code Response and Bushfire Risk Assessment identifies multiple Bushfire Safer Places within the surrounding area. The townships of Lyndoch and Williamstown are geographically closer to the site than Tanunda and represent the nearest designated Bushfire Safer Places in accordance with existing regional emergency planning arrangements.

The identification of these townships as Bushfire Safer Places reflects established State emergency management frameworks and provides contingency refuge options only. Their inclusion does not imply that evacuation to any township is the default or preferred response under elevated fire danger conditions.

As outlined in Sections 6 and 7, the emergency management strategy for the site is designed to avoid unplanned or reactive evacuation wherever possible. Where a Catastrophic Fire Danger Rating is forecast, proactive site closure and early relocation of occupants off site will occur in advance, prior to the onset of hazardous conditions. In this context, Lyndoch, Williamstown and Tanunda represent potential off-site destinations available to occupants once they have safely departed the site.

For Extreme Fire Danger Days below the Catastrophic threshold, occupants will remain on site and be managed under the direction of the Emergency Control Organisation in accordance with the Bushfire Emergency Management Plan. Under these conditions, reliance on evacuation to a township-based Bushfire Safer Place is neither assumed nor required as part of the planned response.

Accordingly, the identification of Lyndoch, Williamstown and Tanunda as Bushfire Safer Places should be understood as secondary, contingency measures, rather than as an indication that the development depends on township evacuation to manage bushfire risk. The primary life-safety strategy remains early, planned closure on Catastrophic days and managed shelter-in-place during Extreme fire weather, supported by site design, construction standards and emergency management arrangements.

8. Summary

This Technical Memorandum confirms that the Bushfire Risk Assessment and Bushfire Emergency Management Plan have been prepared to inform planning assessment based on the current site design, access arrangements, construction standards and proposed operational model. It is recognised that bushfire risk is dynamic and influenced by changing land use, vegetation condition, climate, operational practices and regional emergency management arrangements.

Accordingly, it is expected that the Bushfire Emergency Management Plan and associated bushfire management operational statements will be reviewed at least annually, and following any significant change to site layout, operations, access, vegetation management or emergency management arrangements. This review process should ensure that all bushfire prevention, preparedness, response and recovery measures, including policies, procedures and training, remain current, effective and aligned with contemporary best practice and emergency service expectations.

Ongoing review and update of bushfire management documentation is an essential component of maintaining an appropriate level of life safety risk over the life of the development and supports adaptive management in response to evolving fire risk, operational experience and regulatory requirements.

Yours sincerely,

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