



26 February 2020

Michael Lennon
Planning Commissioner
State Planning Commission
DPTI.planningengagement@sa.gov.au

Dear Sir,

Eudunda Farmers Limited owns and operates 20 Foodland and IGA supermarkets throughout country South Australia and employs over 700 people in these country towns.

We have been consulted by and strongly support the submission made by Colin Shearing from the SA Independent Retailers.

Our major concern is Out-of-Centre development.

The main problem is where a supermarket development occurs outside the main commercial area of a town. An example is Mannum where the original main street has been decimated by the construction of a major supermarket some 1.5kms away on the approach to the town. This new centre has shifted a significant amount (say 50%) of the retail traffic away from the old shopping area. Many shops in the old shopping area have closed because of reduced viability. The old shops relied on the traffic produced by the surrounding shops. They have not been replaced by shops in the new out-of-town centre. The new centre has a majority of vacant shops. Some of the new shops have never had a tenant during the 9 years since it was built.

We would like to ensure shops and in particular full-line supermarkets are kept to the main business area of the town currently described as District Town Centres. If larger stores are warranted, these existing centres should be expanded. The opening of completely new centres should be avoided.

On-Line shopping is also having an impact on traditional bricks and mortar retailing and is reducing their viability.



To ensure the existing retailers remain viable, the new code needs to make sure any proposal is properly considered to show a strategic fit with the town centre.

To do this, the proposals need to be publicly notified, they should show that the proposal will not detrimentally impact other existing centres and they should show that any new development passes a net community benefit test.

One of the reasons for Out-of-Centre development is to provide better carparking facilities because of the lack of carparking in the traditional Main streets.

Councils need to be encouraged to develop carparking in and around the existing shops to improve their viability.

Main Street programs have been and should continue to be used to improve the public realm, streetscapes and the overall presentation of the main streets and townships and to encourage uplift and private investment.

Some of these have resulted in a reduction of carparking due to tree planting or street furniture. These initiatives should consider the impact on the viability of the shopping precinct and in particular should be trying to increase the amount of parking.

Yours Sincerely



Alistair Schuller
Managing Director

Cc: Stephan Knoll, Minister for Planning [REDACTED]