

Apartment 10, 6 Foley Street, Mona Vale NSW 2013
ph: 02 9979 5570

11 March 2019

Ms Claire Ryan
Planner - Northern Beaches Council
c/o Village Park, 1 Park Street
Mona Vale
NSW 2103



Dear Ms Ryan,

Re: **Development Assessment/Application No. DA2019/0123**

Address: Lot 26 DP 654262 80-82 Mona Vale Road MONA VALE

The attached submission opposes approval of the above DA lodged by Organic Food Markets and fully details cogent reasons to support this position.

However, included within the submission is an alternative relocation site that meets the needs of all key stakeholders, especially the market's loyal customers.

Yours Sincerely,

A large, stylized handwritten signature in black ink, appearing to read "Peter McDonald".

Dr Peter McDonald



Email: teamjest@bigpond.com

Submission

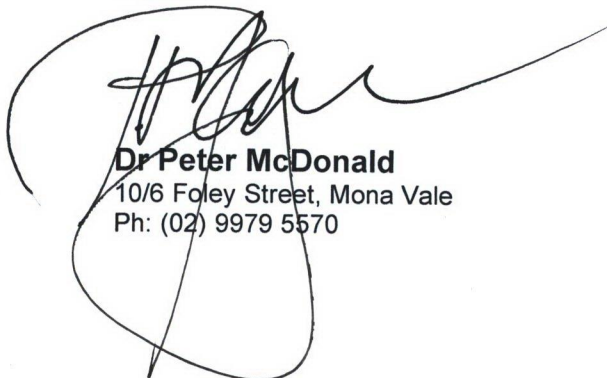
Application No: DA2019/0123

Address: Lot 26 DP 654262 80-82 Mona Vale Road
MONA VALE

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Signed:



Dr Peter McDonald
10/6 Foley Street, Mona Vale
Ph: (02) 9979 5570

1. Major Errors, Inconsistencies & Omissions

DA2019/0123 - Supporting Documents

The following details the major Errors, Inconsistencies & important Omissions within the above DA supporting documents:

1. Plans:

- a) Have incorrectly shown the Foley Street Carpark lower Exit (Only/No Entry) as a point of vehicle Entry.
- b) Have omitted the residential buildings on Foley Street directly opposite the Pittwater RSL Club.
- c) Have omitted the government bus stops on each side of Foley Street.

2. Environmental Impact Statement & Operational Management Plan:

These January 2019 documents are riddled with major inconsistencies, as exemplified by the following direct quotes –

EIS

“... access hours of 6.30am to 2.00pm and trading hours of 7.30am to 12.30pm”; “Traders arrive in a time period approximately 90 minutes before the advertised time of commencement for shoppers. Equally a period of approximately 90 minutes is used to take down and clear the market” (Pages 2, 3).

“... market set-up will commence at 7.00am with an advertised commencement time for customers of 8.30am. From 8.30am onwards the site will be cleared of all traffic movements” (Page 3).

OMP

“From 6.30am allow traders to start setting up”; “Most traders will park behind their stall ...” (Page 2).

“... at 12.30pm commence packing up. Traders are only to get their vehicle when they have packed down and are ready to load” (Page 4).

Note: DA seeks approval for a market to trade from 7.30am to 12.30pm (Page 2).

3. Parking & Traffic Impact Report:

- a) Inconsistencies in the operating hours of the market (cf. 2.) are continued:
"The Sunday market is proposed to operate between 6.30am to 1.30pm with stall owners arriving after 6.30am. Trading hours will be between 8.00am and 12.30pm. Traders will leave the site by 1.30pm". (Page 6)
- b) Incorrectly states that each of the three Collector Roads - Foley Street, Vineyard Street, and Warriewood Road "... carries two traffic lanes in each direction." (Page 9). In reality, the *single* traffic lane in each direction on Foley Street is separated by unbroken double lines.
- c) Has omitted, hence not taken into consideration, another key Collector Road – Jubilee Avenue (An important Entry/Exit point to the RSL Club's Carpark for traders vehicles, which will be closed during trading hours).
- d) Has omitted, also not taken into consideration, the 3Tonne Load Limit that applies to Foley Street, and Warriewood Road and been on street signage since 2010. Advanced warning signs of these forthcoming 3T Load Limit restrictions were installed on Mona Vale Road and Jubilee Avenue in 2013. (Note: 4.5T truck is a very popular stallholder vehicle).
- d) Static parking demand figures provided are contrary to the market operator's experience that "*markets tend to generate a flow of traffic across the market hours rather than a large flow inwards at opening and out at closing*" (EIS, Page 3).

4. Parking & Traffic Impact Report versus Plans:

Report shows Scenario B (Table 3-5, Page 15) as sacrificing **153** car parking spaces for a Sunday market. However, there are only **104** car parking spaces currently 'available' within the existing carpark area shown in the Plans.

Finally, to enable this DA to be fully evaluated the following must be provided:

- A.** Re-work of the Plans, Environmental Impact Statement, Operational Management Plan, and Parking & Traffic Impact Report to rectify the major errors, inconsistencies and omissions as highlighted in 1 – 4.
- B.** Layout Design that shows how the Frenchs Forest Markets will be replicated in the parking spaces currently available in the specified area within the RSL Club's carpark – “... *designed to accommodate a large proportion of the traders vehicles behind their stall for the duration of the market*” (EIS, Page 2).
- C.** Traffic Management Plan which reflects the flow of traders, market customer and RSL Club member vehicles over the entire 7 hour period the market is operating.
- D.** Noise Impact Report examining these Sunday Markets real-time impact on the sleep disturbance and amenity of the RSL Club's nearby residents, also over the entire 7 hour period the market is operating.

2. Proposed Space to Replicate **Frenchs Forest Market is Grossly** **Understated**

To arrive at the above ‘firm’ position, I have undertaken the following:

1. Downloaded and analysed **15** example Photos of the Frenchs Forest Market (hereafter FFM) from their extensive Online Photo Gallery (refer overleaf).
2. Visited FFM on Sunday 3 March 2019 from 9.00am to 9.45am to experience ‘live’ the validity of what these **15** Photos illustrate.
3. Leveraged the above activities, customer experience with similar food markets and taken account of the market operator’s suggestion that *‘most of the 70-100 traders vehicles will be behind their stall for the duration of the market’* (EIS, Page 3) to derive a more reasonable estimate of how many RSL car spaces will be required to replicate the FFM.

Overall, the example Photos and ‘live’ FFM market experience have served to validate that 3-4 metres of aisle/walkway space is needed for market customers to be able to comfortably move, browse, stop, buy, mingle, eat & drink.

Moreover, there were numerous instances of traders using a lot more than one Gazebo (3, 6, 9, or 12) to display and sell their wares. This is especially the case for those traders selling fresh produce (fruit & veg, meat, fish, and dairy), the predominant reason why people usually attend such weekly markets.

Although there were some examples of trader vehicles being parked behind Gazebos/stalls in the more open Parkway Hotel carpark, the very restrictive ‘curb & gutter’ nature of the RSL carpark will limit this from happening within the confines of a single car space.

For each of the ‘to scale’ plots we have depicted (refer overleaf) a small vehicle – car, or van, or truck and a single or double Gazebo – within the dimensions of a single or double RSL car space. In the Table that follows, the extra square metres and %’s for each of these six plots have been calculated.

Table 1

<u>Vehicle/Gazebo Mix</u>	<u>Trader Area/s</u>	<u>RSL Car Space Area/s</u>	<u>Extra Space Required</u>	<u>Extra Space Required</u>
	(m2)	(m2)	(m2)	(%)
<u>Exhibit 1a)</u>				
Small Car & 1 Gazebo	22.20	13.75	[8.45]	[61%]
<u>Exhibit 1b)</u>				
Small Car & 2 Gazebos	28.80	27.50	[1.30]	[5%]
<u>Exhibit 2a)</u>				
Small Van & 1 Gazebo	23.10	13.75	[9.35]	[68%]
<u>Exhibit 2b)</u>				
Small Van & 2 Gazebos	28.20	27.50	[0.70]	[2%]
<u>Exhibit 3a)</u>				
Small Truck & 1 Gazebo	24.00	13.75	[10.25]	[75%]
<u>Exhibit 3b)</u>				
Small Truck & 2 Gazebos	30.60	27.50	[3.10]	[11%]

In the absence of a detailed Layout Design for a ‘transplanted’ FFM market, the above results for the six possible options in Table 1 indicate that:

- a) Single Gazebo options would require from **61%-75%** more space (or 8.45-10.25 extra m2) than is provided by a single RSL car space.
- b) The ‘knock-on’ effect of **2** facing single Gazebo options would drastically shrink the width of a central aisle/walkway between them from 6.2 metres to 2.4 metres (small car), to 1.8 metres (small van), to 1.2 metres (small truck).
- c) On average, two car spaces per trader, is a reasonable basis for suggesting that at least **200** car spaces or more will be required versus the **104** currently ‘available’ within the existing carpark area shown in the submitted Plans.

To round out this part of the submission, in Table 2 (overleaf), we have adjusted the ‘Parking Demand versus Supply’ figures for each of the Six Time Blocks – as per Scenario B, Table 3-5, Page 15 within the Greys Consulting’s Parking & Traffic Impact Report, 7 January 2019.

Table 2

<u>Parking Demand</u>	<u>08.00</u>	<u>09.00</u>	<u>10.00</u>	<u>11.00</u>	<u>12.00</u>	<u>13.00</u>
Market Stalls (incl. small vehicles)	200	200	200	200	200	200
Traders Vehicles ("overspill")	43	43	43	43	43	43
Market Customers	154	155	157	155	157	0
RSL Club Members	0	29	39	55	79	196
"Return & Earn" Installation	5	5	5	5	5	5
<u>Total Demand (1):</u>	<u>402</u>	<u>432</u>	<u>444</u>	<u>458</u>	<u>484</u>	<u>444</u>
<u>Total RSL Supply (2):</u>	<u>397</u>	<u>397</u>	<u>397</u>	<u>397</u>	<u>397</u>	<u>397</u>
<u>Deficit (1 minus 2):</u>	<u>[5]</u>	<u>[35]</u>	<u>[47]</u>	<u>[61]</u>	<u>[87]</u>	<u>[47]</u>

Taking account of all of the parking demand needs on a Sunday, the escalating car space deficits from **5** to **87** vehicles (refer Table 2) will compel their drivers to exit the Pittwater RSL car park and onto the three Collector roads which only have very limited parking available.

This represents a potential market customer versus RSL Club member conflict over 'rights to use' the car park that will need to be prudently considered when the Traffic Management Plan is developed.

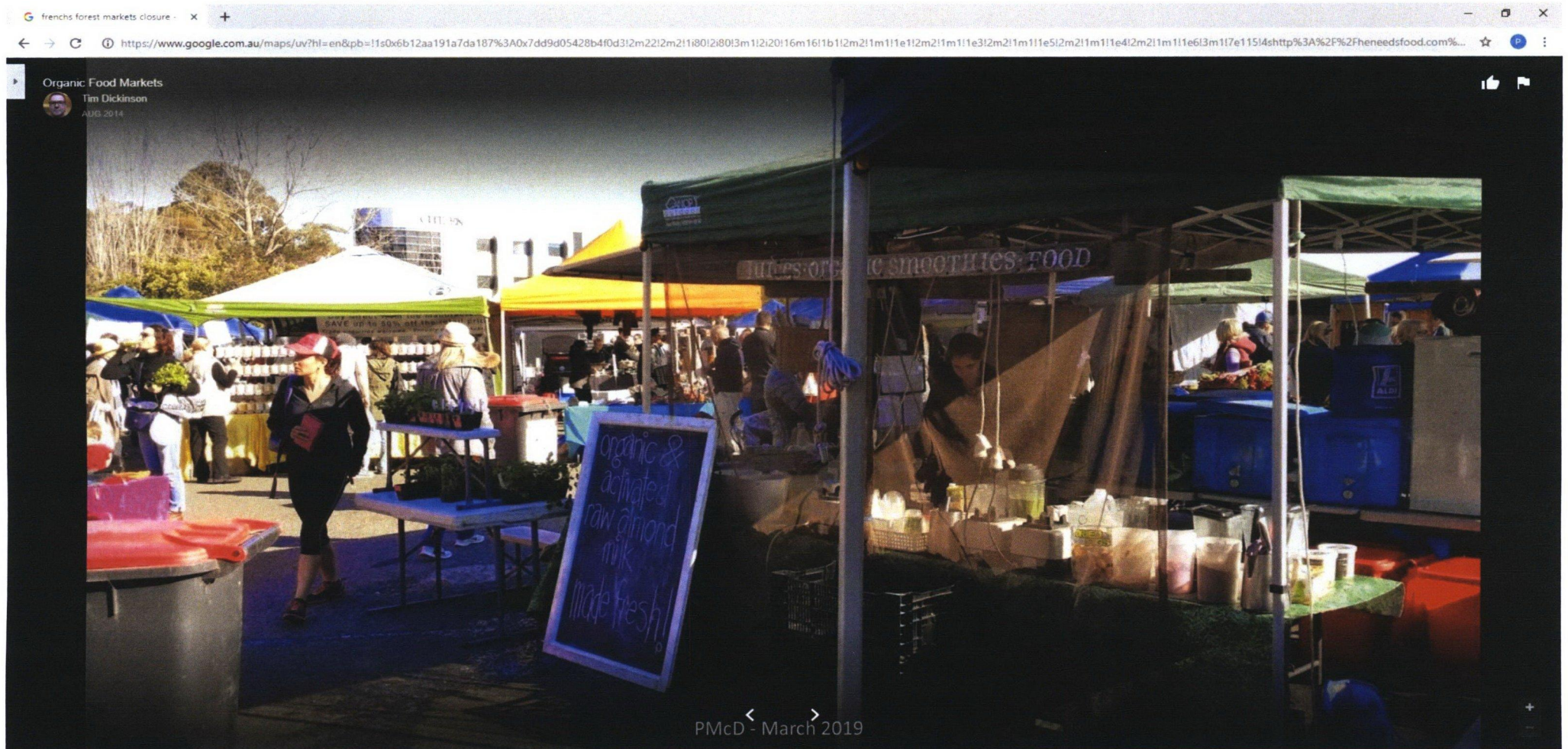
Frenchs Forest Markets – Example 1.

(Heaps of Space for Market Customers to Mingle, Browse & Buy)



Frenchs Forest Markets – Example 2.

(Selling to Market Customers from More than One Gazebo)



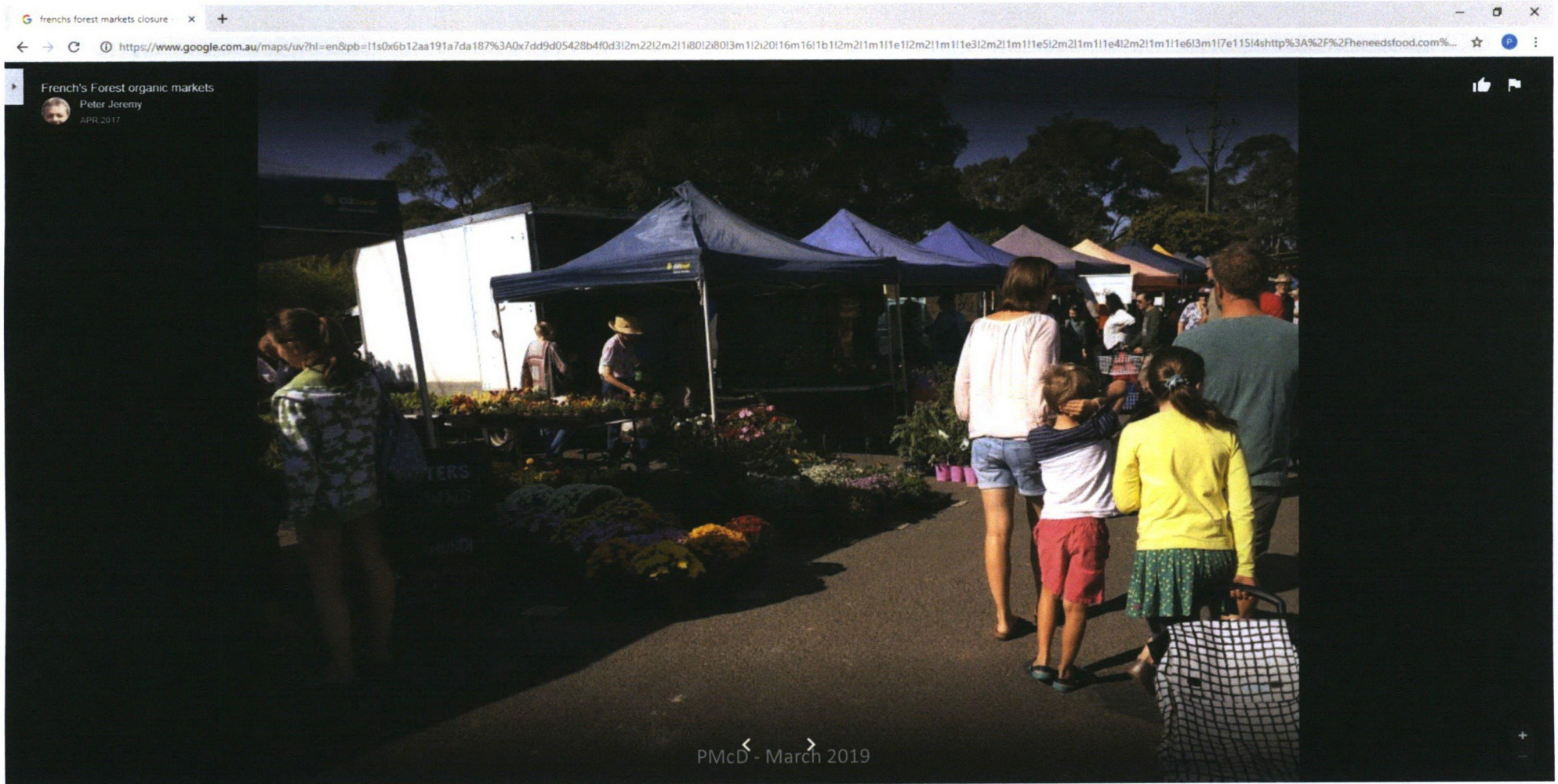
Frenchs Forest Markets – Example 3.

(Space for Market Customers to Move, Browse, Stop, Mingle, Buy)



Frenchs Forest Markets – Example 4.

(Able to Replenish Stock of Fresh Flowers from Trader's Behind Stall Truck)



Frenchs Forest Markets – Example 5.

(Heaps of Space for Market Customers to Mingle, Move, Eat & Drink)



Frenchs Forest Markets – Example 6.

(Multi-Gazebos, Tables & Chairs for Market Customers to Eat & Drink)



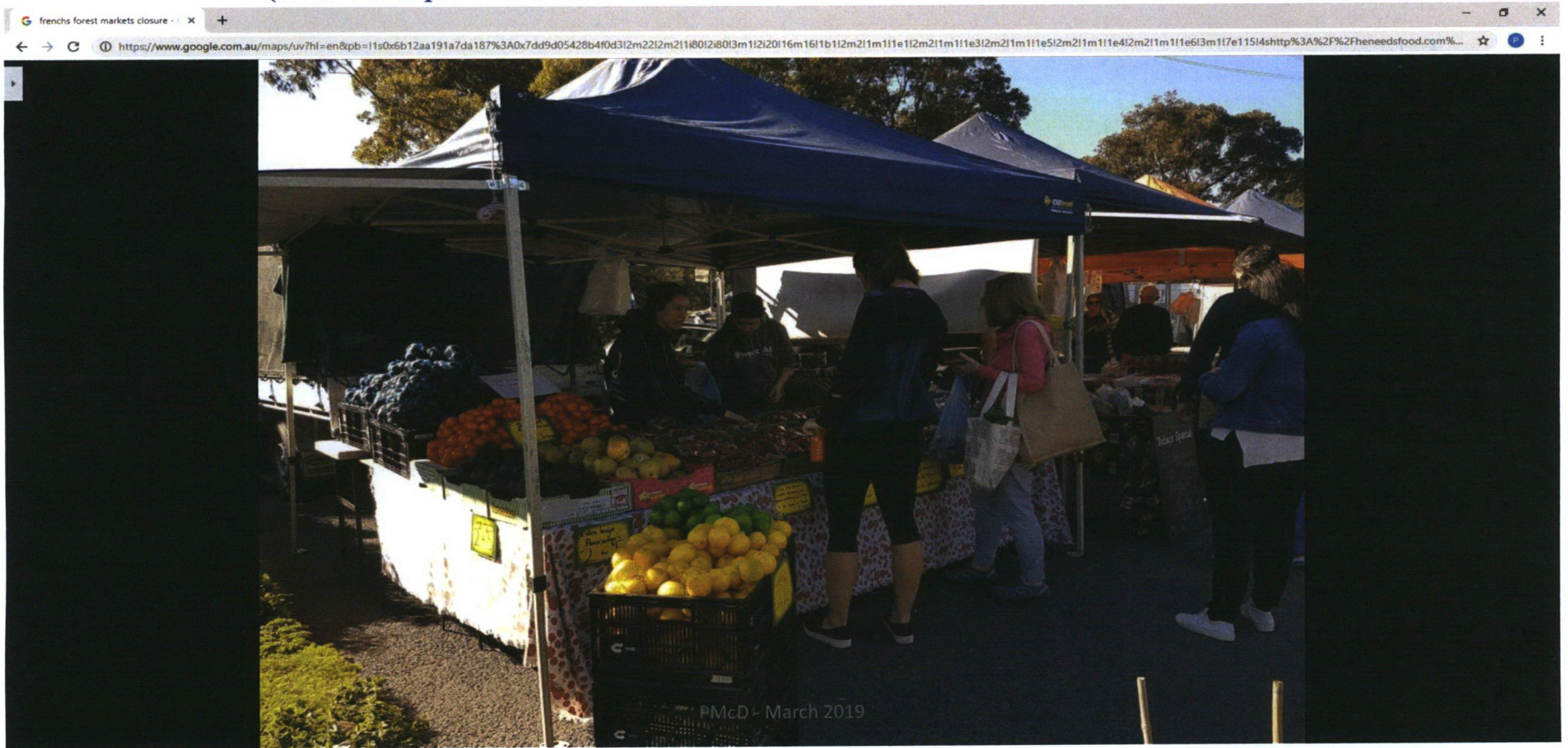
Frenchs Forest Markets – Example 7.

(Multi-Gazebos to Present & Sell High Quality Fresh Seafood)



Frenchs Forest Markets – Example 8.

(Able to Replenish Stock of Fresh Food from Trader's Behind Stall Truck)



Frenchs Forest Markets – Example 9.

(Lots of Space, Multi-Gazebos, Tables & Chairs for Market Customers to Eat & Drink)



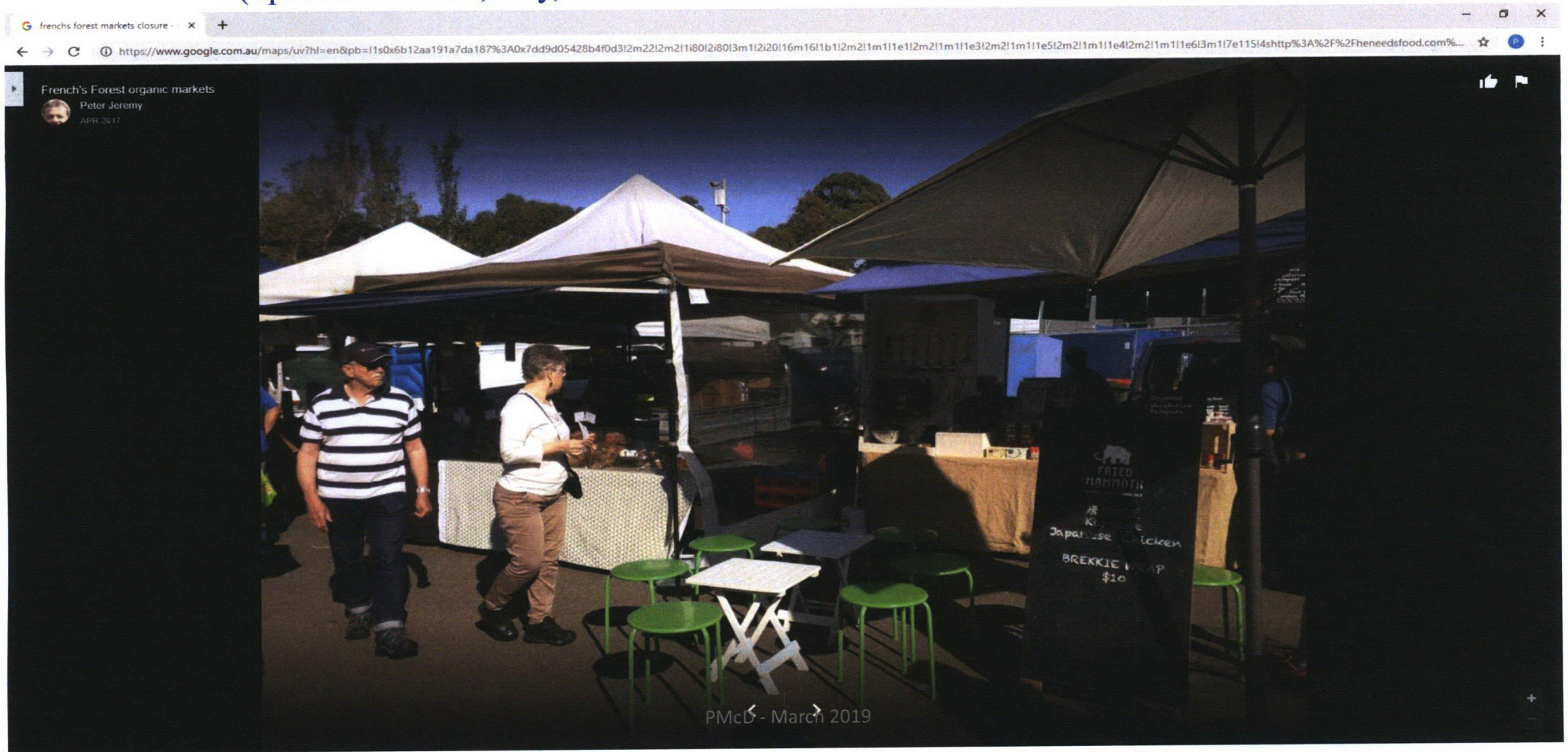
Frenchs Forest Markets – Example 10.

(Hot-Food Alley with Space to Eat-on-the-Run, Tables & Chairs to Eat & Drink)



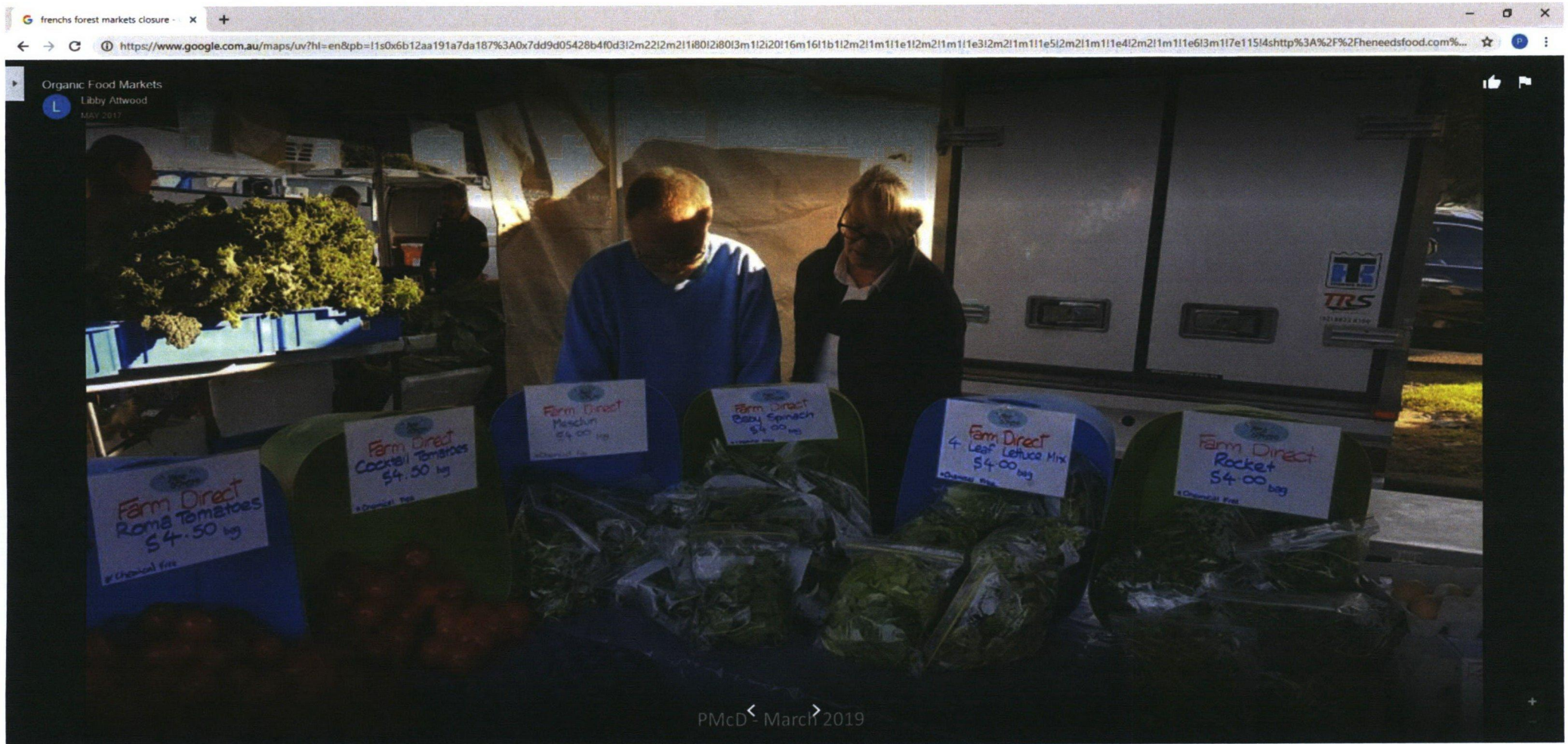
Frenchs Forest Markets – Example 11.

(Space to Browse, Buy, Tables & Chairs for Market Customers to Eat & Drink)



Frenchs Forest Markets – Example 12.

(Replenishing Stock of Fresh Vegetables from Trader's Behind Stall Truck)



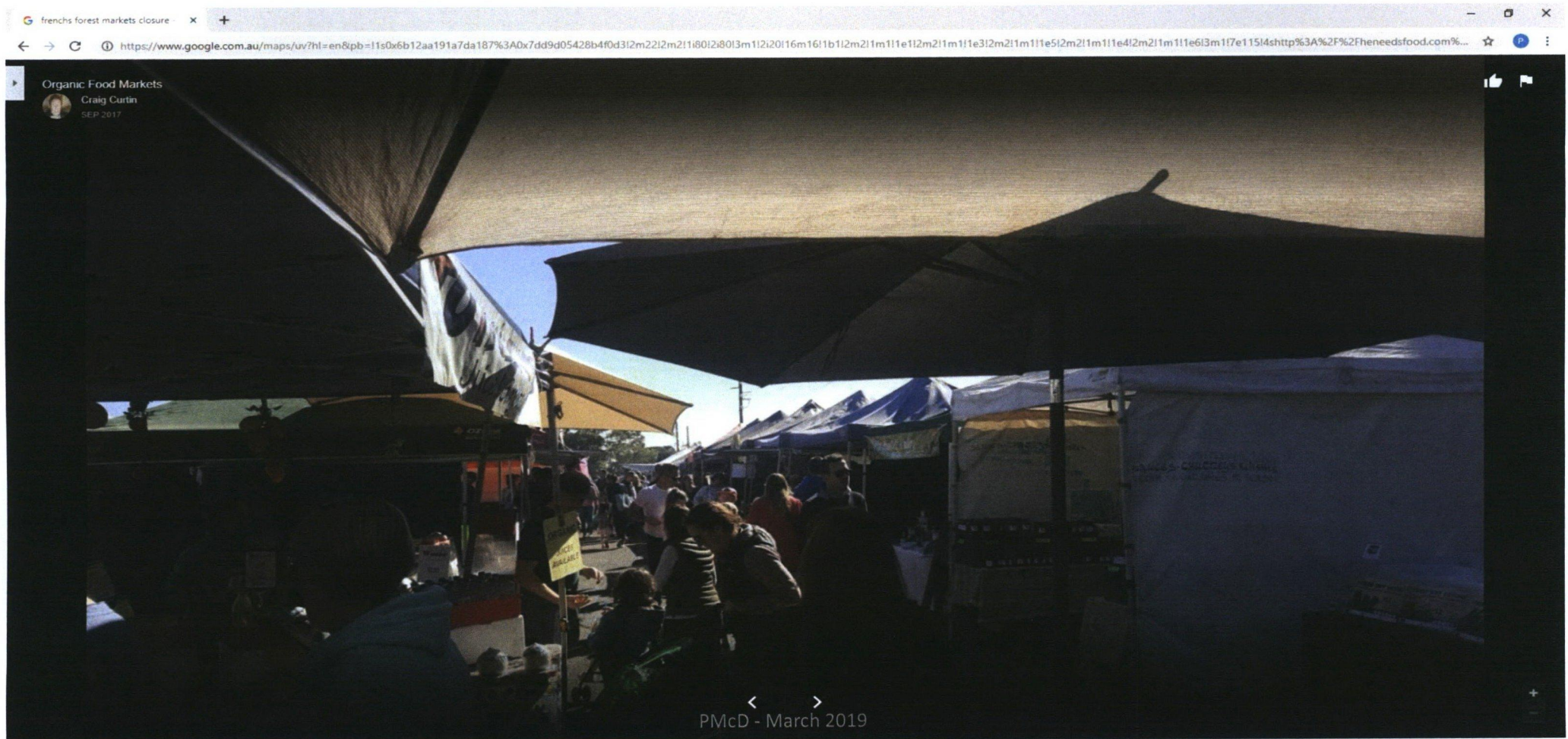
Frenchs Forest Markets – Example 13.

(Freedom for Market Customers to Eat-on-the-Run, Eat & Drink at Tables & Chairs)



Frenchs Forest Markets – Example 14.

(Standard Corridor between Stalls for Market Customers to Browse, Shop, Move, Mingle)



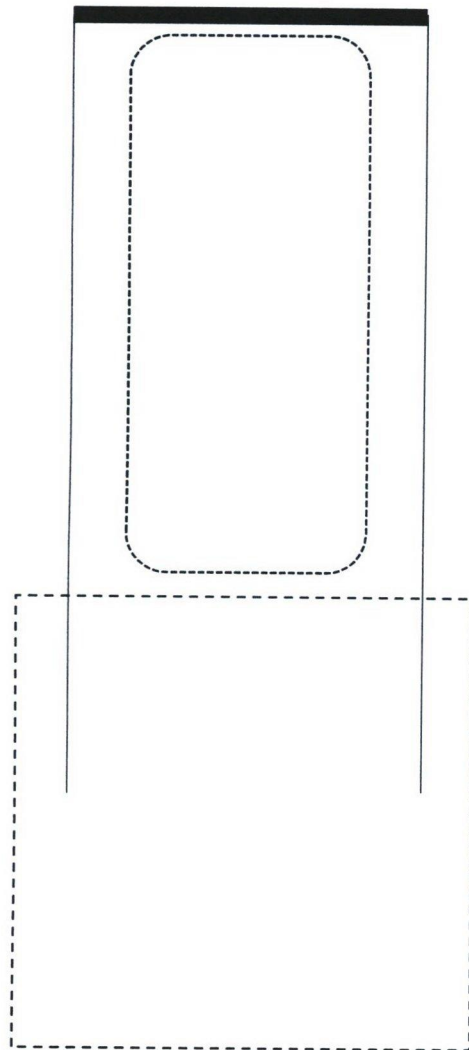
Frenchs Forest Markets – Example 15.

(Very Wide Corridor between Stalls for Market Customers to Browse, Shop, Eat & Drink)

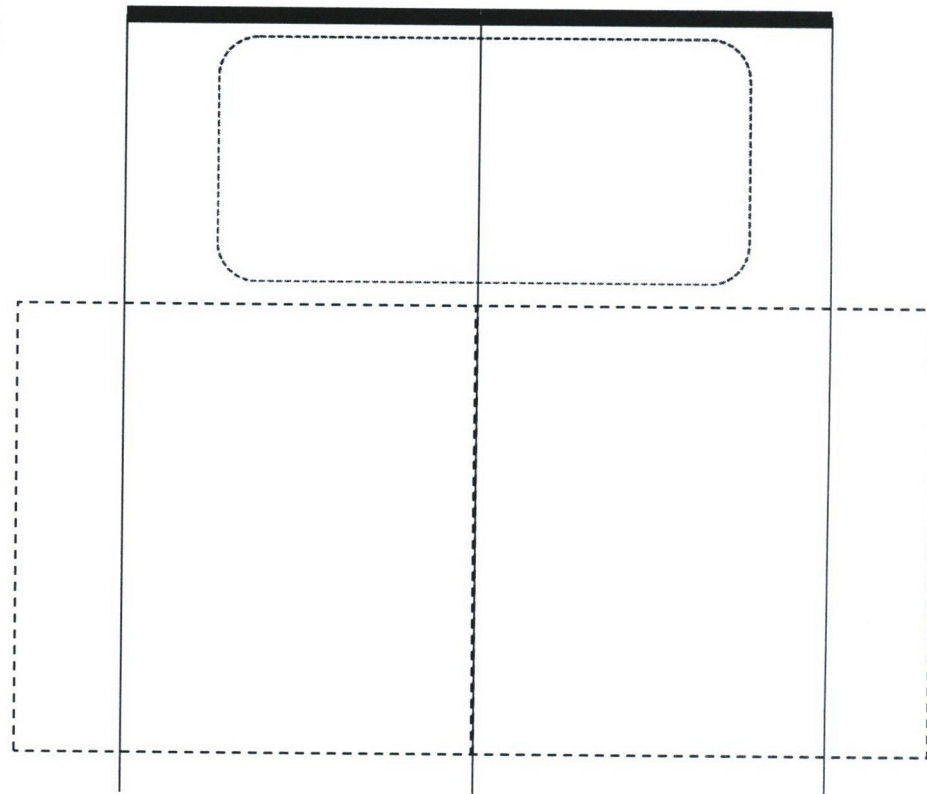


Exhibit 1: Small Car (Toyota Corolla Hatch)

a)



b)



Key:

RSL carspace 2.5m x 5.5m



Small Car 1.8m x 4.4m

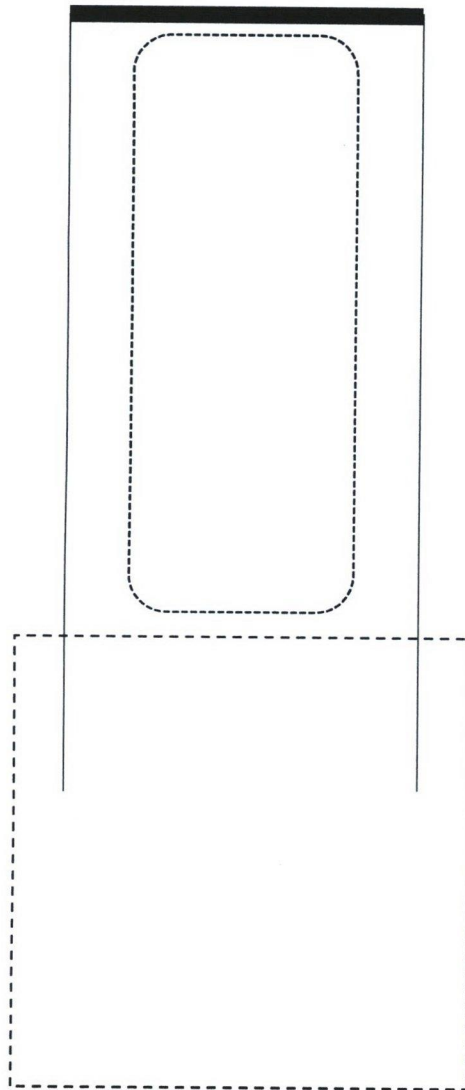


Gazebo 3.0m x 3.0m

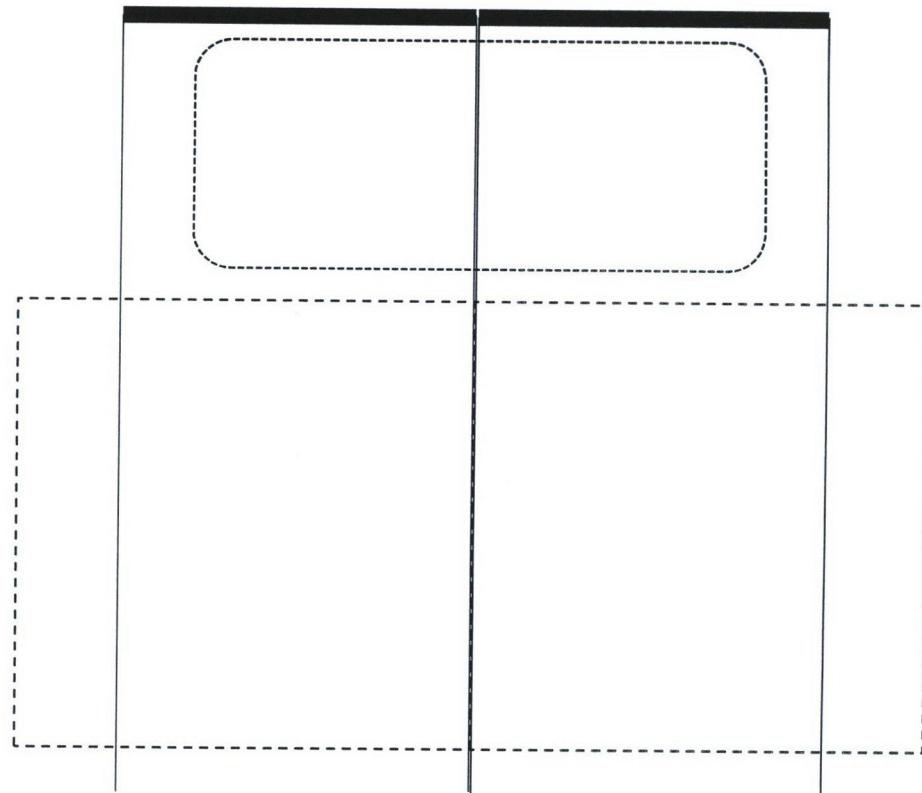


Exhibit 2: Small Van (Toyota Hi-Ace)

a)



b)



Key:

RSL carspace 2.5m x 5.5m



Small Van 1.7m x 4.7m

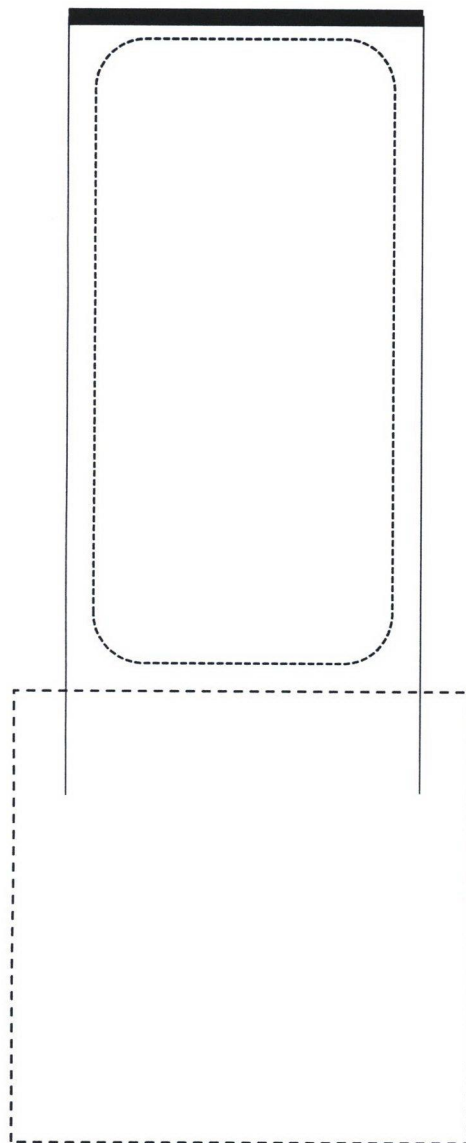


Gazebo 3.0m x 3.0m

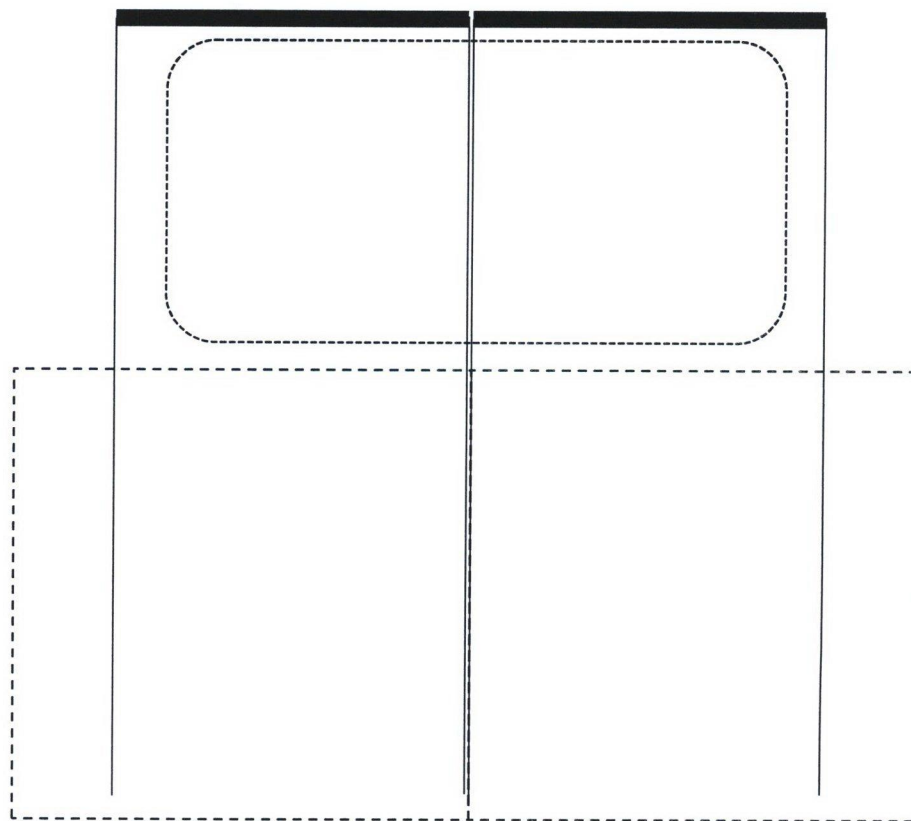


Exhibit 3: Small Truck (Izuzu NLR45-150)

a)



b)



3. Likely Market Traffic Flow

Entering/Exiting the RSL Carpark

Will Be Intolerable & Risky!

In line with the market operator's experience that "*markets tend to generate a flow of traffic across the market hours rather than a large flow inwards at opening and out at closing*" (EIS, Page 3), it was necessary to develop 'vehicle movement' estimates in explicit detail (Refer Table 3).

Table 3

Sunday 'Vehicle Movement' Estimates by Hourly Time Blocks.

	<u>07.00</u>	<u>08.00</u>	<u>09.00</u>	<u>10.00</u>	<u>11.00</u>	<u>12.00</u>	<u>1.00</u>	<u>Totals</u>
<u>Arrivals:</u>								
Traders	77	43	0	0	0	0	0	120
Market Customers	0	154	198	200	198	190	0	940
Club Members*	0	0	29	10	16	24	117	196
Sub-total:	<u>77</u>	<u>197</u>	<u>227</u>	<u>210</u>	<u>214</u>	<u>214</u>	<u>117</u>	<u>1256</u>
<u>Vehicles/Minute</u>	<u>1.3</u>	<u>3.3</u>	<u>3.8</u>	<u>3.5</u>	<u>3.6</u>	<u>3.6</u>	<u>1.9</u>	<u>3.0</u>
<u>Departures:</u>								
Traders	0	0	0	0	0	43	77	120
Market Customers	0	154	198	200	198	190	0	940
Club Members	0	0	0	15	5	8	12	40
Sub-total:	<u>0</u>	<u>154</u>	<u>198</u>	<u>215</u>	<u>203</u>	<u>241</u>	<u>89</u>	<u>1100</u>
<u>Vehicles/Minute</u>	<u>0.0</u>	<u>2.6</u>	<u>3.3</u>	<u>3.6</u>	<u>3.4</u>	<u>4.0</u>	<u>1.5</u>	<u>2.6</u>
<u>Total Movements</u>								
Traders	77	43	0	0	0	43	77	240
Market Customers	0	308	396	400	396	380	0	1880
Club Members	0	0	29	25	21	32	129	236
Grand Totals:	<u>77</u>	<u>351</u>	<u>425</u>	<u>425</u>	<u>417</u>	<u>455</u>	<u>206</u>	<u>2356</u>
<u>Vehicles/Minute</u>	<u>1.3</u>	<u>5.9</u>	<u>7.1</u>	<u>7.1</u>	<u>7.0</u>	<u>7.6</u>	<u>3.4</u>	<u>5.6</u>

* Note: Club member 'arrivals' created on an *incremental* basis to deliver 196 car spaces required by 1.00pm

These 'vehicle movement' estimates have been computed on a *flow versus static* basis using the 'raw' parking data featured in Scenario B, Table 3-5, Page 15, Greys Consulting Parking & Traffic Impact Report, 7 January 2019.

When undertaking this task, it has been assumed that:

1. Trader and local staff (20%) vehicles of 120 are in place by 8.30am and have cleared the site by 2.00pm.
2. Market customers arrive, do their shopping and depart within an hour.
3. Club member arrivals have been created on an *incremental* basis to deliver the 196 car spaces required by 1.00pm (as per Scenario B).
4. Half of the Club members depart within two hours after having breakfast, or brunch, and so forth.

On a normal Sunday, the estimated total baseline figure for 'vehicle movements' is **236** which consists entirely of RSL Club members using their club.

On a Sunday with the market in full swing, there would be a 10-fold increase in this total 'vehicle movements' figure to **2356**, with excessive vehicle noise, congestion, and pollution totally *destroying* the amenity of nearby residents.

Just imagine, every 8 seconds on Sunday morning from 8.30am to 12.30pm on Foley Street a vehicle will stop, pivot and either enter or exit the RSL carpark.

Furthermore, imagine some of the hourly *deficits* in parking demand versus supply (Refer Table 2, Section 2) being *tensely fought out* in the carpark, before one of the drivers exits the carpark more quickly than anticipated.

In net, an intolerable and volatile carpark Entry/Exit set of circumstances for all parties concerned!!

Note: the market operator has rightly indicated that the Jubilee Avenue Entry/Exit will be closed for any vehicle movements during the market trading hours.

4. Excessive Noise on Sunday Mornings Will Severely Impact Resident Amenity!

In the absence of a Noise Impact Report we are unable to fully appreciate these Sunday Markets *real-time* impact on the sleep disturbance and amenity of nearby residents.

However, we were fortunate to discover and extract unsolicited comments about the Markets within 'verified reviews' of Guests' overall Parkway Hotel experience. Let me underscore that the term 'verified' means that the person providing the review *actually* stayed overnight as a paying Guest at the Parkway Hotel versus a non-Guest *fake* review from a person without such experience.

Visit <https://www.booking.com/reviews/au/hotel/parkway.html> to read these 'extracted' Frenchs Forest Markets' comments and the entire 'verified reviews'. Over the sixteen months in which these unsolicited comments were made, only one was positive, whilst the other ten comments (provided in the next two pages) were negative.

Taken as a whole they raise three fundamental issues:

1. Noisy traders chose to ignore the market operator's operational management plan and set up *extremely early* on a Sunday morning without thinking about disturbing the sleep of the Parkway Hotel's paying guests.
2. Uncontrolled 24/7 access to the Parkway Hotel carpark (same applies to the RSL carpark) has allowed traders to arrive as early as they like and then idle for a few hours until the bump-in officially starts.
3. Parkway Hotel had either no interest in monitoring any 'guest experience' reviews or chose not to advise the market operator of the negative comments about the Markets they had found.

Extracts of Comments Made about the Frenchs Forest Markets Made Within
'Verified Reviews' of the Parkway Hotel.

5 November 2017

"We were told there was going to be a farmers' market on the following day and it would be advisable to park our vehicle around the side of the building to avoid getting blocked in as they began setting up at 6am. This was quite acceptable to us and we complied. The real problem arose when trucks and people started arriving in trucks around 2.45am on Sunday morning and they started setting up. The trucks had loud reversing alarms, the motors were left running in many vehicles and the people were very noisy as they were unloading and setting up. The result of this was that we were unable to get back to sleep. Around 5.30am we got up, had breakfast and left the premises to drive back to Newcastle. As we hadn't had much sleep I had a bit of trouble staying awake and had to keep stopping to recover".

Terrence O'Brien

15 January 2018

"Was not told upon check-in that we would be woken up at 3am by market stalls setting up. We left at 5am looking for another place to sleep".

Greg

26 February 2018

"I hated the fact that there is a farmers' market there on Sunday morning and wasn't told about it, they started setting up at 4am which with a small child isn't great. Not to mention my car was backed in, very hard to get out".

Ellie

26 February 2018

"Being woken up at 4.30am by the people setting up the stall for the farmers' market (was a negative)".

Brendan

4 June 2018

"Only advised of farmers' markets after check-in. Stall holders don't care how much noise they make at 3am in the morning. Avoid at all costs".

Letitia

30 July 2018

"There are markets on Sunday in the carpark of the Hotel. They are supposed to start setting up at 5.30am, not the case when we stayed. One person started putting up his marquee at 12.50am. The hotel advises you not to park your car out the front as it will be blocked in. You will have to wait until the markets are over before you can leave".

Nicole

5 August 2018

*"Hopeless- have stayed there before and put up with the Organic Markets and their noise from **4am** on Sunday morning".*

Greg

26 November 2018

*"Then on Saturday night we got home to them setting up the Sunday markets they have on the property. From **midnight** on we got no sleep due to the noise coming from the stall people setting up right outside our door. There was a tap outside our door that the market people use, this was constantly in use all night. They give no thought to the people staying in the rooms what so ever. They tell you nothing about the markets and all the noise, either at reception or on booking.com".*

Anonymous

31 January 2019

*"Sunday market set up in carpark next to room had people setting up and making noise from **before 6am**, which is unacceptable".*

Anthony

11 February 2019

*"People were setting up for the markets from **1am** Sunday morning and very noisy".*

Anonymous

These Guest comments only provide a *reflective* sense of what it feels like to have your sleep disturbed when the stillness of very early Sunday morning is completely smashed by the thoughtless behaviour of some traders.

Gauging the noise effects of the likely 10-fold increase in the flow of vehicle Entry/Exit movements, as well as the *hubbub* of passenger/market customer movements throughout the market's 7 hours of operation, remain to be examined and revealed.

5. ‘Organic Food Markets’ **Name is Blatantly Misleading &** **Deceptive!**

Decades ago it might have been possible for owners to make credence claims, such as ‘organic’, to gain a competitive advantage for their businesses, brands, or products.

For at least the past six years, the ACCC’s Compliance & Enforcement Policy has listed credence claims (claims that consumers cannot easily verify for themselves) as a priority area – refer www.accc.gov.au or contact the ACCC Infocentre on 1300 302 502.

In 2013 the ACCC firmly rejected the argument of eight companies that the word ‘organic’ was not a representation but part of the brand name. All companies were required to (and did) remove ‘organic’ from the name of the brand, the other two stopped making and selling the brand.

To quote, Deputy Chair, ACCC, Delia Rickard – “*Manufacturers cannot hide misleading claims in their brand name*”. On the same basis, market operators cannot hide any misleading ‘organic’ claims in their trading name/s.

Immediately prior to joining the ACCC as Deputy Chair, in June 2012, Delia held a range of positions at the Australian Securities & Investments Commission (ASIC) where she led much of ASIC’s consumer protection work. In August 2017, Delia was re-appointed Deputy Chair of the ACCC for a further five years.

Website research of the 79 traders listed in the ‘Waste Management Plan’ Addendum, which supports this DA, indicates that only 5 have earned ACO or NASAA Certification (viz; *Eclipse Organics, Beeswax Wraps, Hand n Hoe, Honest to Goodness, and More Health*).

While another 5 use ‘organics’ in their trading name to describe what they produce without any substantiation and/or reference to AS 6000:2015 (viz; *Block 11, Noble Organics, Pariva Organic Produce, St Malo Bakery, and Wild Nature*).

In net, I would argue that the market presence of **1 in 16** stall holders who can *rightfully* claim 'organic' falls *significantly* below what the trading name 'Organic Food Markets' actually represents to market customers.

Furthermore, I imagine the ACCC would not take kindly to any individual or entity that appears to be complicit in encouraging and/or permitting the use of 'organic' in the name of a weekly food market (note: the ACCC have been made aware of this possibility).

To be found to do so, would contravene relevant sections of the Trade Practices Act 1974 which deal with misleading representations.

6. 'Re-birth of Frenchs Forest Markets in a Fresh, Conflict-free, Local Location!'

If you were to *re-imagine* a local location that would substantially meet the needs of the Frenchs Forest Market operator, traders, local staff, local businesses, market (esp. loyal) customers, tourists, the Council – and is free of 'substitute' business and ongoing resident conflicts - then the spacious Warringah Aquatic Centre (WAC) precinct would have to be top of your list!

A site visit and walk around last week confirmed that there are multiple opportunities to comfortably place a Sunday food market within part of the massive, tree-lined carpark area. Huge grassed areas above the carpark will allow lots of market customers to peacefully gather, chat, eat and drink after shopping.

Also readily available are the necessary water, power, and toilet facilities. WAC is well buffered from the nearby industrial park by natural bush and just as easily accessed by vehicle as the existing Frenchs Forest Markets.

While WAC may have been previously considered and rejected in the 3-4 years 'notice to relocate' the operator of the existing Frenchs Forest Market has had, key changes in the overall market environment now demand a major re-think.

1. The Education Department has not yet determined to relocate The Forest High School.
2. If a decision was made to relocate The Forest High School, students would not move until the new high school was built.
3. The Forest High was NOT included in the \$6bn the NSW Government has committed to spend to deliver 170 New and Upgraded Schools over the next 4-5 years.
4. Persistent softer economic conditions have stalled the growth of housing development such as that envisaged in the yet to be developed Frenchs Forest Town Centre – the trigger to either force The Forest High School to relocate or to progressively re-distribute its students to other NBC high schools.

When you stop and think about it, with smart, future-forward planning there is no good reason why a re-born French Forest Market could not coexist with whatever re-development of the WAC precinct might occur 5plus years from now.

To set this major re-think in wider context, directly quoted below are concluding remarks from the Federal Government's "*Understanding the Characteristics of Australian Farmers' Markets*" report, (RIRDC Publication No. 14/040, June 2014).

"While there are clearly many positive aspects of farmers' markets, an issue arising from the surveys was the increased competition between farmers' markets with some farmers' markets being deemed less viable because of the introduction of newer farmers' markets within proximity of each other. Equally, the demographics and size of the potential customer base in a location may not sustain a farmers' market. Therefore this research study has concluded that the goal and future for the farmers' market movement should not be about growing the number of farmers' markets but about growing the market share of individual markets with a particular region".

Last week, the principal author of this Report, Vicki Woodburn, said that she believes the above key research conclusions are just as applicable to today, as they were when she reported them.

Furthermore, when distinguishing between metro (versus truly local/rural) located farmers' markets, Vicki suggested that complementary food markets might be viable and positively build community. However, two head-to-head *essentially* substitute food markets in close proximity to one another, regardless of what day of the week they operate, places the viability of each food market and community spirit at risk!