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Cover Page

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FISH HOEK VALLEY RATEPAYERS & RESIDENTS ASSOCIATION

(Incorporating Fish Hoek, Clovelly and Sun Valley)

Central Circle, Fish Hoek 7975

Web: <https://www.fishhoekratepayers.com/> Facebook: www.facebook.com/FHVRRA/

Heritage Western Cape: Conservation Body

TO: DEON LOUW deon.louw@capetown.gov.za

SUBJECT: COMMENTS ON INFORMAL TRADING PLAN FOR WARD 64, SUBCOUNCIL 19¹

DUE DATE: 10 OCTOBER 2020

1. DISCUSSION

On 7 September 2020 Cllr Aimee Kuhl invited us to an open day session and to submit comments on a Draft Informal Trading Plan for Ward 64, Sub-council 19. We emailed our members and posted the main points on our FaceBook page for comments from the actual community this plan is supposed to serve². From that survey and stakeholder meetings, we comment as follows:

The City has subverted the legislative intention for supporting free markets. By the City adopting a tick-box mentality to provide the allusion of fulfilling this mandate, it has lost sight of empowering, supporting and nurturing informal traders to grow and realise their goal to become formal retailers. The City may claim that it offers more trading bays than are filled, but what the City has actually done is to bring slums into more upmarket areas. Bringing everyone down to the lowest common denominator is not a way to grow a prosperous, cohesive society. People do not choose to live in squalor, but not providing adequate facilities does just that. We highly recommend the City rethink its approach to restore dignity by providing retailer and manufacturing training, support in toilet and storage facilities, rubbish bins and waste collection services, water for consumption and food preparation as required by health inspectors, City management enforcing adherence to goods being contained within the trading bay area and not blocking wheelchair access on nearby pavements, not competing with nearby formal retailers for the same product lines and not sub-letting to other traders at ten times the monthly tariff.

The decline of Fish Hoek's High Street / Main Road towards our own Hillbrow will be exacerbated by further informal traders being provided limited facilities. The lowering of standards will create less employment opportunities for all as future investment will dry up.

In general, random, disparate trading bays nearby formal retail stores does not make good sense as retail space is all about location. Even pop-up stores don't work for long. One just needs to ask why did the previous retailer fold.

One way to accomplish a good balance between formal and informal traders would be to centralise all informal trading bays in Fish Hoek to be in very close proximity to their market, the interface between the Metrorail Station and the taxi rank. Fish Hoek may be a transport hub, but this area is the real target market of informal traders. However, the area must be a well-managed, fully serviced, centralised market which can be aesthetically pleasing that actually draws tourists, local customers

1 <http://www.capetown.gov.za/City-Connect/Have-your-say/Issues-open-for-public-comment/draft-informal-trading-plan-for-fish-hoek>

2 <https://www.facebook.com/FHVRRA/posts/616225478953509?> tn =-R
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and truly helps the local economy. NPO / BPO Angels Resource and Training Centre and Revamp the Valley³ have agreed to assist the traders (Eco Hoek).

Bayside Bazaar

Conspicuous my its absence is any mention of the current informal trading area at Bayside Bazaar, erf 7000 Fish Hoek, between the Fish Hoek Metrorail Station and 55 on Main in the train precinct which is closer to those who might actually purchase from informal traders. These containers and informal shacks are an eye sore, source of pollution with their night soil and meal cooking activities, which are dumped into the grate in the middle of the parking lot there. This stormwater grate flows directly to our beach.

There are currently seven traders in this venue that need to be accommodated in future solutions.

We support the following:

1. The existing containers be removed immediately;
2. The Bayside Bazaar area be used for parking;
3. This area be enclosed with spiked palisade fencing;
4. This parking area's entrance must be controlled during the day and locked at night to eliminate drug dealers and degenerates;
5. This parking area should be restricted to paid parking with the proceeds thereof being utilised for maintenance of the area and wages for the parking attendant;
6. This parking area must be restricted to non-passenger vehicles only as the screaming and shouting from taxis and their conductors is a major contributor to the destruction of local businesses.

The owner of 55 Main Road (Krinos building), Dr Carnie Mattison, has offered to pay the cost of:

1. Enclosing the area;
2. Security (visible policing);
3. Managing it on behalf of the City as a parking lot for non-commercial vehicles on the basis that all income derived from the parking will be utilised for payment of wages to an employee tasked with controlling and cleaning this parking area,

subject to a permissions agreement and land use agreements for an initial period of ten years with three additional ten year options at no cost to Dr Mattison.

The proposal entails the following:

We oppose all informal trading bays not within the centralised trading area as described above.

Annexure B :

Cnr Central Circle & Fifth Avenue

Please note that no one has ever traded here. The bays have been moved inside the civic centre's fenced area making them even less accessible to the targeted customers. One trading bay is located at the only park bench in the area. Residents often see the elderly sitting there as a resting place when they either live nearby or can't find parking sufficiently close to the Civic Centre offices, such as on days when the well attended University of the Third Age meet. The other trading bay is located where tariff paying markets advertise their events at the sign that announces the City offices. Their banners would then not be seen which could result in the City halls not being used (loss of tariff revenue to the City).

Annexure C:

Cnr Recreation Rd & First Avenue

No one has ever traded here.

Annexure D : First Avenue

Small packet fruit and veggie seller has been here for years. Rubbish build-up has been a problem in the past, but rubbish removal has been improving.

Annexure E :

Cnr Recreation & Main Rd

There has only ever been one wire art trader here.

**Annexure F:
Cnr Main Rd & Dunster Avenue**

No one really trades here.

**Annexure G :
Cnr Beach & De Waal Rd**

No one really trades here.

**Annexure H :
Cnr Main, Beach & Station Rd**

No one really trades here.

**Annexure I :
Cnr Main & Central Rd**

No one really trades at bay #1. Bays 2 and 3 are continuously problematic in rubbish generated, overflowing their stand which blocks wheelchair passage. These traders are not the ones registered with the City, according to them.

Annexure J: Main Road, erf 12812

No one really trades here.

Further comments on the Informal Trading Plan

Section 8.4.1 – by implication, does not allow sub-letting, yet this is what is happening. See our proposed managed solution above.

Section 8.4.2 – this makes no sense

Section 8.4.4 – 20 people cannot fit in this bay. Please amend to three.

Section 9.5.4 (a) – by implication, does not allow sub-letting. See our proposed managed solution above.

Section 9.5.4 (b) – there is direct competition between Annexure I: Cnr Main & Central Rd trading bays 2 and 3 and our major clothing retailer, AP Jones. The City is not monitoring properly. See our proposed managed solution above.

Section 9.5.4 (h), (i), (j) – really? Is this being monitored? See our proposed managed solution above.

Section 9.5.4 (l) - "allowing the individual to working permit". What kind of English is this?

Section 9.5.4 (m) – is this being monitored? See our proposed managed solution above.

Not mentioned is that food preparation for food traders and thus, to pass health certificate / inspections, need access to water for safety reasons.

Is the proposed tariff per trading bay of R104 per month fair?

Not fair - our main retailer pays R17,000 per month to the City. With no services being provided by the City, the tariff may seem reasonable. However, the ratepayers are paying for all the infrastructure, including the EPWP who sweep up the mess they make. City services should include a rubbish bin, waste collection, provision of electricity, water, ablution, shade, storage facilities and parking spaces. Obviously, the City will need to charge more to cover these services. As all tariffs go to the City and are not earmarked for Fish Hoek, the collection effort seems pathetic. The previous Fish Hoek Administration did not allow for informal traders and thus, did not collect trading bay tariffs.

After consultations with the informal traders, none interviewed pay their tariff directly to the City. They actually pay the entity registered with the City R1,000 per month. Something's not right. See our

proposed managed solution above.

A well managed environment for our informal traders to operate

As the paint de-marking the trading bay areas has faded, managing that traders stay within their respective bays would be difficult to enforce. The responses received indicate that the trading bay areas have never been managed. In particular, the two trading bays' goods and bay assistants chatting to themselves at the Town Square often require pedestrians to walk in the street or completely avoid by walking in the Town Square parking lot. This alone is sufficient grounds for most residents to claim that trust has been broken with the City. One commenter thought that managed informal trading was an oxymoron. Three meters by one meter is inadequate for most types of trade, yet it is too large for wheelchairs to pass between the vendor and pavement curb. On any day, at least one wheelchair can be seen in our CBD. A local gym occasionally "bombs" the pavement with an aggressive marketing campaign. Who is managing these usurpers? See our proposed managed solution above.

A positive relationship with the community

The community feels that trading bay areas are often untidy and sources of rubbish. The City could do a lot by adding properly serviced waste bins instead of relying upon EPWP to sweep the area once a day. See our proposed managed solution above.

Alternative products or services

There are three leather goods stands already at Town Square. Informal traders should not be competing amongst themselves, but worse, they are competing with a leather goods manufacturer and retailer in a shop on Upper Recreation Road between Main and Beach Roads. Worse yet is that several often sell socks, caps, backpacks and luggage in competition with our main department store, AP Jones, established in Fish Hoek over 100 years ago. Where is the City management? See our proposed managed solution above.

When we asked our community if anyone had purchased anything from an informal trader, two only responded in the affirmative, although neither confirmed these complied with our Category 2 traders requirement for providing semi-specialised goods and services to supply the surrounding "suburbs". Most just said that the vendors offer nothing to their interest and won't bother to visit any informal pavement stand in the middle of their own rubbish. Others have never witnessed any purchases at these trading bays.

Do our informal traders live near the informal trading bays?

None are known to live in Fish Hoek. Near is an ambiguous term. We do not want to encourage informal sleeping areas in the vicinity.

What should the trading hours be?

We suggestion hours of 09:00 to 17:00 weekdays and 09:00 to 13:00 on weekends.

Would you buy foodstuff from an informal trader?

The majority consensus was that none would buy foodstuff other than a properly packaged "boerie" roll that they watched being cooked, but otherwise, "no". Without the provision of water and sanitation pipe, food prep should not be allowed by the City Health Department.

City's basic service requirement is street lighting

Trading hours are during the day. The requirement for street lighting seems redundant. We think basic services should include daily cleaned, lit, public toilet / ablution facilities with a visible policing with a Law Enforcement Station next door to the single trading centre with cluster of bays to provide safety and to ensure taxis don't use the sink water to wash their taxis as they do now.

Clean Record

We think the informal trader selection criteria should include being VAT registered or present annual tax clearance certificates and that they have never been prosecuted for selling illegal or fake goods or substances.

Conclusion



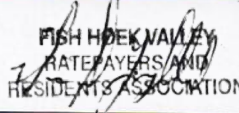
We fear the general decadence that characterises the existing informal trading areas in Fish Hoek will spread with the concomitant tendency to ignore or violate City regulations, block the pavement, litter, sell fake goods etc. This will have the effect of discouraging existing customers and driving out formal traders.

In general, most public responses were negative. Informal trading bays do not appear to be servicing the community that live here. If pavement trading is to help the economy, is VAT being collected or taxes paid to fund all the State's social programmes? The City should confirm that all vendors are VAT registered or it could have to pay their tax for condoning illegal trading as was required by the City when Revenue Services discovered that many labour brokers to the City were not paying VAT.

We offer an alternative managed, single market area, which we call Eco Hoek, instead of the fragmented trading bays up the noses of the formal retailers paying high monthly rates to the City and taxes to government's coffers.

For the City to allow pavement trading, it has to be prepared to constantly manage and enforce its rules. Is the City prepared to do that? Does it have the capacity? See our proposed managed solution above.

What are the City's plans for informal traders to become formal traders?

NAME & SURNAME	Dr. Carnie Mattison, owner: 55 on Main, Fish Hoek
SIGNATURE	
NAME & SURNAME	Andre Blom, Chair: Fish Hoek Community Police Forum
SIGNATURE	
NAME & SURNAME	Mike Reaper, Chair: Fish Hoek Business Improvement District
SIGNATURE	Abstained - but will submit separately
NAME & SURNAME	Lizelle Coombs, Chair: Angels Resource and Training Centre
SIGNATURE	Abstained - but will provide training
NAME & SURNAME	Brian Youngblood, Chair: Fish Hoek Valley Residents and Ratepayers Association (FHVRA)
CONTACT NUMBERS	Cell: 084 3 99 99 33
E-MAIL ADDRESS	bdyoungblood@gmail.com or FishHoekRRA@gmail.com
SIGNATURE	 FISH HOEK VALLEY RATEPAYERS AND RESIDENTS ASSOCIATION
DATE	25 September 2020

I CONFIRM THAT THE ENVISAGED TRADING AREA IS
BETWEEN THE STATION & THE GREEN ROOF DESIGNATED TAXI AREA.
AND THAT ACTION MUST BE TAKEN AGAINST TAXIS ON OR NEAR
ERF 7000 OR THE ENTRANCE TO THE STATION.
THE TAXI ANARCHY MUST BE REPLACED BY ORDER & CONFINEMENT
TO THE "GREEN ROOF AREA"
TAXIS MUST NOT BE PERMITTED TO PARK IN STATION
ROADS OR ON OR NEAR ERF 7000 & 55 ON MAIN.

