

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 ET AL

SUBJECT: COMMENTS ON INFORMAL TRADING PLAN FOR WARD 64, SUBCOUNCIL 19

DUE DATE: 21 FEBRUARY 2020

1. DISCUSSION

On 10 February 2020 Deon X. Louw invited internal comments on an Informal Trading Plan for Ward 64, Sub-council 19. As the ratepayers association covering the Fish Hoek CBD, we emailed our members and posted the main points for pre-public comment from the actual community this plan is supposed to serve¹. From that survey, we offer the following as guidelines to your comments. Many points raised are housekeeping items in your respective areas that need to be addressed before granting approval.

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?

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.

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?

When we asked our community if anyone had purchased anything from an informal trader, two only

1 https://www.facebook.com/FHVRRA/posts/616225478953509?__tn__=-R
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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.

Location of informal trading bays

Where should the informal trading bays be located? Provision has been made for bays at:

1. the Fish Hoek Civic Centre (2x parking lot),
2. Station / Beach Road (6x),
3. Beach Road (1x taxi rank),
4. Main Road (1x next to Warren's Pharmacy, 2x pavement by Town Square, 8x Shoprite end of Dunster Ave),
5. along First Avenue / Main Road (1x),
6. First Avenue / Recreation Road (3x opposite Wellwood Chapel) for seven days a week.

Many de-marked bays are always empty. Fish Hoek is clearly not a sustainable area for pavement vendors.

The two at the Civic Centre are problematic. One 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 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).

The two, actually three spaces are currently occupied, at Town Square are problematic in that rate paying pedestrians do not have access to the pavement as the informal traders have not left sufficient space for walking or wheelchairs.

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

Conspicuous by its absence is mention of Bayside Bazaar behind 55 Main (Krinos Building) and Metrorail 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.

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 (why did the previous retailer fold?). Our alternative proposal is a well-managed, fully serviced, centralised market can be aesthetically pleasing that actually draws tourists and truly helps the local economy. The owner of 55 Main Road (Krinos building), Carnie Mattison, has offered to provide such a lockable space subject to permissions and land use agreements. NPO / BPO Angels Resource and Training Centre and Revamp the Valley ² have agreed to assist the traders (Eco Hoek).

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.

Is the proposed tariff per trading bay of R93 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.

What should the trading hours be?

2 <https://mailchi.mp/d88177c1c588/launching-an-eco-market-for-the-south?e=4464cbb814>

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.

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

I 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.

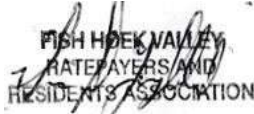
In general, most public responses were negative. Informal trading bays do not appear to be servicing the community that live here. If pavement trading is to help the economy, is VAT being collected or taxes paid to fund all the State's social programmers? The City should confirm that all vendors are 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 offered an alternative 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?

Often the open period for public participation is too short. So, we started early this time. We hope that you accept our comments to improve your document.

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

NAME & SURNAME	Brian Youngblood, Chair: Fish Hoek Valley Residents and Ratepayers Association (FHVRRA)
CONTACT NUMBERS	Cell: 084 3 99 99 33
E-MAIL ADDRESS	bdyoungblood@gmail.com or FishHoekRRA@gmail.com
SIGNATURE	
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