

Johannesburg, 28 August 2014

CUBES
CENTRE FOR URBANISM
& BUILT ENVIRONMENT STUDIES

FOLLOW UP

CUBES Submission to City of Johannesburg, re: ‘Informal Trading: Inner City Promulgation and Designation of Trading Areas’, after the consultation meeting held at the Metro Center, 06 August 2014.

PART II

CUBES further submits the following comments and suggestions, in addition to those submitted on the 17th of August 2014, in the light of new information provided by the City of Johannesburg on the process, on a second round of consultations at street and area level.

COMMENT 5 (Note: comments 1 -4 included in the submission of 17th August 2014)

CUBES supports the exploration of an area or precinct-based approach to street trading management, and processes involving all relevant stakeholders to find locally relevant agreements and design solutions, to allow for all users to enjoy the inner city streets.

1. Research indicates that this area-based / precinct-based approach is most productive and efficient when general principles regarding street trading have been engaged with and agreed upon, at inner city or city level.
2. Precinct-based negotiation does not replace meaningful engagement at the inner city and city level, but is an additional layer. Both processes take time and ideally both continue to occur simultaneously.
3. Precinct-based negotiation should include all relevant stakeholders: residents, property owners and traders of the precinct, but also the representatives and support organizations they choose to invite. In reality the playing field is not even - for instance street trader organizations are often more able to put decisions and proposals in perspective than individualized street traders. Excluding representatives from organizations, associations and other civil society groups which have relevance for the conversation is likely to exacerbate inequalities rather than contribute to a more balanced debate.
4. In the case of new areas needing to be considered for trading promulgation, street trader representation is also required. In other words the absence of street traders in the area should not lead to street traders not being represented in the discussion. A variety of street trader organizations and other relevant civil society groups would need to be invited.

SUGGESTION 5

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1. The commitment by city policy and strategic documents, reiterated in the presentation made to stakeholders between 29th of July and the 6th of August, that street traders should be included and accommodated in the city, should be the starting point of area-based conversations which complement city or inner-city level discussions.
2. Precinct-based engagement on promulgation of street trading should include relevant city officials, users of the precinct, and also relevant civil society organizations. A democratic, just, and pragmatic process could be:
 - The City to publicise area-based/ precinct-based workshops: to make them open to all instead of exclusive.
 - The workshop to elect task teams (with representatives of each sector in each) to take the process forward and propose precinct-based agreements on:
 - o Streets and spaces where trading can occur (possibly, under which condition) / street and spaces where trading should not occur (or, under which condition)
 - o Alternatives to accommodate existing traders (if relevant)
 - o A structure for the joint management of street trading at a precinct-level (city officials, representatives of all stakeholders).
 - The City to allocate some resources to these precinct committees, including design capacity to explore how to best accommodate different land uses in the dense inner city space.

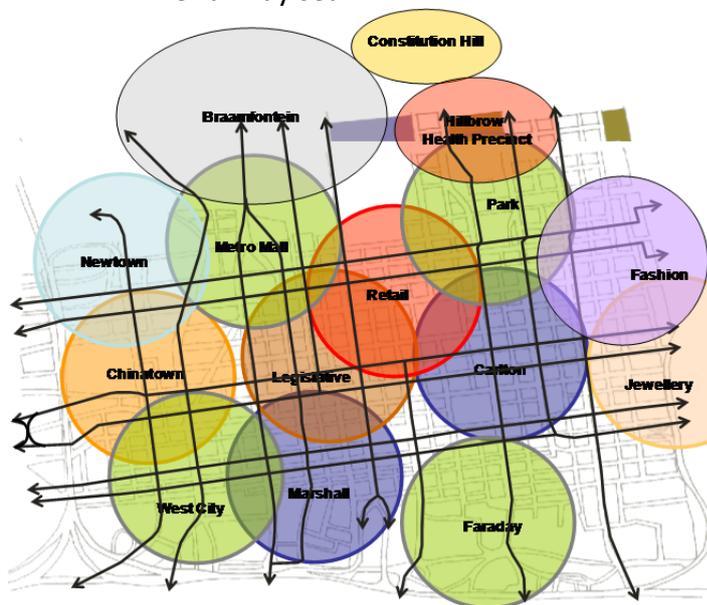
COMMENT 6

The City of Johannesburg has called for inputs from all sectors of society, without really defining what kinds of inputs were expected, and what was or what was not opened for discussion.

1. It is unclear for instance whether the City wants to start on a blank slate as far as the inner city is concerned (and re-open debate on spaces that were formerly prohibited for trading), or if it wants to add restrictions to those already existing.
2. The lack of publicity on individual and organizational submissions (as mentioned in comment 1 of the submission of 17th August 2014) is detrimental to a genuine debate opening on which spaces should be opened or restricted for street trading. Conducting street or area debates without a clear picture of the whole impacts negatively on constructive debates – for example by restricting a fair discussion of alternative trading spaces in the event that street traders need to be relocated from a specific precinct.

SUGGESTION 6

1. We once again call for information and transparency, that can only be beneficial to all of us (City and civil society) to find sustainable and pragmatic solutions (i.e. information on the submissions, all stakeholders' meeting for those submissions to be presented, summarized, and debated; information on the meetings for precinct or street-based discussions).
2. We would like to suggest that all precincts (as determined by the inner city road map) be reopened for debate on the sustainability and management of street trading. Each precinct could follow the process indicated above. This would include submissions made by a variety of individuals and organizations that could be discussed in their broader, precinct context. That would reopen the debate on the place of street trading in the city. Such precincts include:
 - Braamfontein
 - Hillbrow and Berea
 - Yeoville and Bellevue
 - Greater Ellis Park, Doornfontein and New Doornfontein
 - Newtown
 - Inner City Southwestern Precinct
 - Fordsburg, Vrededorp and Pageview
 - Inner City Eastern Core
 - Inner City Central Core
 - Bertrams, Jeppestown and Troyeville
 - Industrial Belt
 - The railway seam



Source: Inner City Roadmap 2014

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