



BID Hub:
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Attn: Mr N Slade,
Group Head Technical Services,
Arun District Council

Date: 14th August 2023

Dear Mr Slade,

BR BID Formal Response to Proposals: Two Hours Free Parking Scheme in Bognor Regis

The Bognor Regis Business Improvement District (BR BID) was voted in by two majority counts to represent the best interests of its business members. Since 2018, the BID has invested funds paid by businesses as a partnership contribution towards the continuation of the incentivised two hour parking scheme, and BID staff - whose salaries are paid by the businesses of Bognor Regis - have managed all aspects of scheme delivery. A 2022 consultation with businesses evidenced that the BID's work with partners to deliver the two-hour parking scheme *in its existing form* is ranked in the top three most impactful activity the BID carries out to both support businesses and to improve the town.

The latest iteration of the Two Hour Parking Scheme proposal recommends that all management of scheme delivery and direct payments for participation transfers to ADC Parking with effect from 1st January 2024. From this point, the scheme could be accessed independently via an electronic app downloaded to a smartphone, or with supported access for non-smartphone owners from ADC Customer Service staff during opening hours at the Bognor Regis Town Hall. For the calendar year 2024, ADC Parking propose delivery of a "dual scheme", with an unlimited number of electronic permits available to download and "as many as needed" cardboard discs available to purchase from ADC Customer Service staff based at the Town Hall. No cash payment options are available. The proposals recommend ADC's participation in a multi-agency working group to advise on management of a transition to virtual only permit scheme from January 2025. Following the one year "dual scheme", the proposals would see incentivised parking restricted to app-only access from 1st January 2025.

1. BID Formal Response: Summary

Following extensive consideration of documents and supplementary information provided by ADC Parking, at a meeting of the Bognor Regis Business Improvement District Board of Directors held on 10th August 2023, Directors unanimously agreed that the latest iteration of the proposal does not represent the best interests of businesses or the wider community and will most likely contribute to reduced footfall in the town centre, negatively impacting its economic viability during already challenging times. The speed of introduction of this proposed approach, which lacks any form of meaningful consultation with businesses, the community or its elected representatives, which cannot facilitate cash payment, which complicates or excludes access for members of the community, and is likely to reduce town centre footfall **does not** have the support of the Bognor Regis BID.

2. BID Formal Response – Specific Details

Bognor Regis Business Improvement District Ltd. A Company Limited by guarantee. Registered in England.
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Since the proposal to introduce changes to the existing scheme was informally presented in February 2023, the BID Chief Operating Officer has made significant efforts to caution ADC Officers and Senior Elected Members in writing, in person and by telephone as to the likely negative impact of pursuing this proposed approach on businesses and the community of Bognor Regis.

The BID's COO has repeatedly highlighted how the proposals complicate, limit or exclude access to the scheme for members of the Bognor Regis community and stressed the potential reputational damage from forcing through such significant changes in the timescale proposed, without any form of wider consultation. These concerns have not been adequately addressed in subsequent iterations of the proposal. BR BID's full paper accompanying this formal response expands on detail and refers to supporting evidence, and an overview of specific objections is summarised below:

1. Failure to acknowledge wider economic benefits of current scheme delivery

The draft proposal ignores the wider economic benefits of scheme delivery through a network of retailers from a range of sectors, failing to consider the impact this has on encouraging footfall across wider areas of the town, and directly into local businesses. Public perception of and support for the scheme in its existing form is high, and comments made on social media evidence its significance in attracting people to the town centre. Under existing arrangements, people understand that, by buying directly from local outlets they are both interacting with and directly supporting town businesses. The purely transactional process of downloading an app will not create the same response for customers and the message of helping the town's traders will be lost. BR BID **does not support** a scheme that undermines town centre footfall and negatively impacts businesses.

2. Limiting access: Restricted Payment Methods

The draft proposal omits the fact that **no payments can be made by cash**, either for the app or for the transitional 2024 disc. This marginalises the elderly and vulnerable and those without means to pay via card or electronic methods. The BID **does not support** a scheme that precludes payment using all forms of legal tender and is likely to reduce town centre footfall.

3. Limiting access: Digital Exclusion

For autonomous purchases, the proposed scheme requires users to purchase a permit online, accessed via a computer or smartphone. This may exclude or complicate access for those without access to technology, who will now require support (from ADC Customer Service Team) to purchase what is currently a straightforward transaction. At the time of writing, in person support from ADC Customer Services is only available from one location, Bognor Regis Town Hall, open weekdays between 9am and 4pm with the exception of Wednesdays (open at 11am). Some benefits of the electronic permit approach, such as extensions of time and the ability to transfer to different vehicle registrations appear to rely on having the app, which requires a smartphone device. This could again exclude access based on affordability and age demographics. The BID **does not support** a scheme that makes access more complicated for the elderly, vulnerable, or digitally excluded, and is likely to reduce town centre footfall.

4. Limiting access: Points of purchase and customer support

During the transitional “dual scheme” period, the draft proposal restricts purchase of the 2024 discs to one location at the Bognor Regis Town Hall, with its limited Monday – Friday opening hours, as opposed to current the network of 24 business locations positioned across the town centre. The majority of these businesses operate six days a week, including weekends, with longer opening hours, offering broader availability. By limiting to one single outlet, during Town Hall opening hours, disc purchases are no longer available to purchase by weekend visitors. The BID **does not support** a scheme that makes access more complicated for the elderly, vulnerable, or digitally excluded, and is likely to reduce town centre footfall.

5. Misrepresentation of outcomes: “Eliminate Misuse”

The draft proposal cites “misuse” of the disc scheme as a key driver for changes to delivery, making the bold claim that potential misuse would be “eliminated from January 2025” following the proposed move to app-based delivery. The evidence cited for this argument is weak, based on only one day of observation, and excludes any reference to breaches of parking by other means during the same time period. Misuse of an electronic permit is as feasible as “misuse” of off-street parking spaces by moving the dial on a disc, by overstaying the time purchased via the RINGO app or pay and display ticket, or by parking in spaces without purchasing any ticket at all. The proposal does not at any point recommend the more effective deployment of Enforcement Officers to monitor and enforce against misuse. The BID therefore **rejects the argument of misuse as presented as sufficient justification** for forcing radical changes to scheme delivery within the time frame outlined, and without wider consultation.

6. Misrepresentation of outcomes: Environmental impact

The draft proposal makes sensationalised, unquantified statements to the environmental impact of producing cardboard discs, which are used multiple times, in circulation for up to 12 months and easily recycled. The BID **objects to the use of hyperbole**, and requests modification of language used.

7. Penalises Bognor Regis Town Centre (1)

The proposal presents scheme simplicity and equity across both Bognor Regis and Littlehampton as local gains. In reality, the pressure to move from local to district management penalises Bognor Regis for its judicious governance of the scheme via an established delivery method which increases footfall across the town centre. Following 27 years of disparity in the availability, funding and delivery of the scheme in the two town centres, BR BID **objects to the argument as justification for such radical change** within the proposed timeframe and without genuine consultation.

8. Penalises Bognor Regis Town Centre (2)

The BID’s management of the two hour scheme in its current form generates only negligible “profit” after production, promotion, staffing and sale or return costs are accounted for. With the proposed transfer to ADC Management, the BID will need to adjust staffing with immediate effect, seriously limiting its capacity to deliver town centre improvements and events prioritised by businesses and supported by the community. BR BID **does not support** radical changes which affect employment and impact its capacity to deliver within the proposed timescale and without genuine consultation.

9. Prejudicial representation of Bognor Regis Businesses

The draft proposal is negatively biased against business participants that purchase, store, actively promote and provide staff to retail the discs to end users, making prejudicial and inaccurate statements regarding “profits” generated by the scheme in its current form. The draft proposal obscures the fact that any small “profits” generated by businesses are, in fact, payment for services rendered. The BID **strongly objects to this negative representation** of committed members of the business community who have contributed to the success of the scheme to date, and insists on a more accurate use of language to describe the services provided and costs associated with their delivery of the current scheme.

10. Penalises Independent Businesses

By assuming management and delivery of the scheme, ADC Parking will absorb all costs and retain all revenue from the sale of two-hour parking permits. However small the amount for scheme retailers, the proposed approach deprives independent businesses and charities in Bognor Regis of direct income for services rendered. BR BID **does not support** a scheme that deprives businesses of income within the timescale proposed and without genuine consultation.

11. Prejudicial representation of Bognor Regis BID

The draft proposal is negatively biased against the BID as scheme delivery partner, using prejudicial language and making inaccurate statements regarding “profits” generated by the current scheme, choosing to obscure the fact that any surplus revenue after direct and staffing costs is invested directly into town centre improvement activity. The BID **strongly objects to this negative representation** and insists on more accurate use of language to describe the costs associated in delivery of the current scheme, and precision as to how any revenue is invested.

12. Absence of costings : Scheme delivery

Despite committing to a revaluation of costs for current scheme delivery, the draft proposal provides no costings – actual or indicative – to inform decision making on changes that are likely to reduce town centre footfall. Similarly, while the proposal elects to negatively highlight “profits” made by both BR BID and local businesses retailing the discs, it omits any staffing, storage or production figures for ADC’s proposed dual-scheme delivery from January 2024. The proposal does not present any details of the costs involved in facilitating the MiPermit scheme, associated payment transaction costs, or potential losses via off street parking ticket sales by offering an unrestricted number of permits. The BID is **highly critical of the absence of credible costings data**.

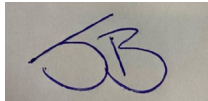
13. Absence of Genuine Consultation:

The recommendation for ADC Parking to participate in a working group with local stakeholders and business representatives *only after* the approach outlined in proposal is in motion, and the omission of wider community involvement evidences a disregard for genuine consultation. This approach is **not supported** by Bognor Regis BID.

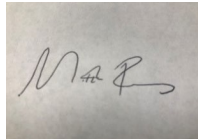
14. Narrow focus of Working Group:

The stated focus for the Working group to “advise on how the transition to virtual only permit scheme in January 2025 is managed” prevents meaningful discussion and debate about alternative provision for a fully accessible scheme in the future. This approach, with its predetermined outcome, does not reflect genuine consultation and **is not supported** by Bognor Regis BID.

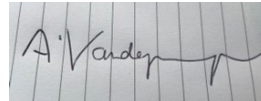
Signed by representatives of the BID Board of Directors:



James Boyle



Matthew Reynolds



Angela Vanderpump