

## CITY OF PLYMOUTH

**Subject:** A Business Improvement District for the Plymouth Waterfront  
**Committee:** Cabinet  
**Date:** 15 November 2011  
**Cabinet Member:** Councillor Fry  
**CMT Member:** Director for Development and Regeneration  
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**Ref:**

**Key Decision:** Yes  
**Part:** I

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### Executive Summary:

This report sets out the City Council's support for the emerging private sector Business Improvement District (BID) proposal for Plymouth's Waterfront, currently being developed by the Plymouth Waterfront Partnership. It defines the Council's financial support for the BID as well as a commitment to establish baseline agreements for the City Council's existing services within BID area. Any business contributions through the BID that come from the private sector are effectively additional investment over and above the support made by the City Council which totals c.£2m/annum.

The Board of PWP have recently taken the decision to proceed to a BID ballot following extensive consultation with over 600 businesses, and independent market research which has identified that 59% of Waterfront businesses supported the principle of establishing a BID.

This report recommends that the City Council signals its strong support for the BIDs establishment by the private sector. The establishment of a Business Improvement District for the Plymouth Waterfront would support the City's Visitor Plan, prepared by Destination Plymouth.

The Local Economic Strategy 2006-2021 and Beyond (LES) identifies the visitor economy (Tourism and Culture) as a priority growth sector which has the potential to generate 7,000 additional jobs over the next ten years. Tourism is a significant industry in Devon and Cornwall and has been recognised in the heart of the South West (HotSW) LEP prospectus. The Visitor Plan is a key component of the implementation of the LES; setting out a framework for realising the potential of Plymouth's visitor economy to 2026.

A Business Improvement District (BID) is a private sector led management organisation for a precisely defined geographical area, where business rate payers have identified projects and services that will have a positive impact on their trading environment. Businesses within the area vote to invest collectively in delivering these improvements which are wholly additional to those already delivered by local, statutory bodies.

The Plymouth Waterfront Partnership (PWP) will be responsible for delivering the Waterfront BID. PWP is an independent, not for profit company limited by guarantee, which currently operates as a voluntary membership partnership with a Board of Directors representing all the key business sectors in the BID area, run by and for local businesses.

PWP, supported by the City Council, continues to conduct extensive consultations with the business community in the Barbican and Waterfront following investment in the Waterfront Manager post. The BID is about investment in the area and sustainable partnerships. The BID legislation does not require that the Local Authority endorse the BID proposals, however it is essential that Plymouth City Council confirms its support, financial and in kind.

Once a BID has been established all businesses contribute a BID Levy based on the rateable value of their premises (hereditaments) to ensure fairness and equity. BIDs have a maximum duration of five years.

PWP will provide leadership and management and be directly accountable to Waterfront businesses for the delivery of the BID Business Plan, working in partnership with Plymouth City Council, Destination Plymouth, the Police Authority, Plymouth University and other public agencies to benefit businesses located within the Waterfront area.

PWP have yet to decide on the precise BID boundary area, however it will cover the primary attraction areas of The Barbican, Sutton Harbour, The Hoe and foreshore. It may also encompass Millbay and Royal William Yard to ensure a wide view is taken on the visitor experience. The Waterfront BID area will buffer against the boundary of the City Centre Company's existing BID area, ensuring enhanced links between the two areas and a seamlessly positive visitor experience.

There are already 110 BIDs in the UK, including Falmouth, Newquay, Tavistock, Taunton, Torbay, Bristol and Plymouth. A mark of their success is that 99% of BIDs are renewed by business ballot after their first term.

The full draft version of the Waterfront BID Business Plan will be available from 6 October 2011 at: [www.waterfrontbid.co.uk](http://www.waterfrontbid.co.uk).

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### **Corporate Plan 2011-2014:**

Through the Waterfront Partnership and the consolidation of resources the City will attract more visitors and visitor spend, increasing the number of jobs within the visitor economy, encouraging enterprise, improving skills and making Plymouth a thriving regional centre.

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### **Implications for Medium Term Financial Plan and Resource Implications: Including finance, human, IT and land**

The City Council will continue to provide existing statutory services and in kind support, such as premises, ICT, legal and administration at current levels. In addition, provision of BID levy billing, collection and enforcement costs (through the Courts to a maximum value of £9,000 per annum), payroll, accountancy and invoice payment support.

Through the Waterfront BID the City Council will be held accountable to the business community and required to maintain their existing levels of service within the Waterfront. BID projects will be entirely additional to existing City Council services.

National BID legislation enables the PWP to establish a contractual agreement with the City Council over its provision of existing services in the Waterfront area to guarantee that they continue throughout the five year BID lifetime.

The proposed Waterfront BID projects and services will be entirely additional to any services already delivered by Plymouth City Council. PWP will establish a contractual agreement with Plymouth City Council to regularly review Council services delivered within the Waterfront BID area. Once the Waterfront BID has been established, the Council will be contractually obliged to maintain agreed standards to conform to baseline service level agreements for all services provided (and listed in the body of this report)

The Waterfront BID Levy will be payable by all businesses located within the boundary of the defined Waterfront BID area. Plymouth City Council will be required to contribute approximately £15,000 per annum in BID Levy payments as it owns properties located within the proposed BID boundary.

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**Other Implications: e.g. Community Safety, Health and Safety, Risk Management and Equality, Diversity and Community Cohesion:**

None. Destination Plymouth and Plymouth Waterfront Partnership, will continue to ensure that its activities support these objectives

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**Recommendations and Reasons for recommended action:**

It is recommended that the Cabinet:

1. Endorse the principles and overall approach of the draft Waterfront BID Business Plan 2012-2017.  
**Reason:** To confirm the partnership approach to the Business Improvement District and establishing a framework for service improvement mechanisms within the Business Improvement District area.
2. Approve the City Council's existing and new financial, match and in kind contributions (totalling £3,157,000) and continued commitment to support the Waterfront BID at existing levels through the proposed BID Contract for the provision of services within the Waterfront Business Improvement District area.  
**Reason:** To enable the Plymouth Waterfront Partnership to implement the Business Plan 2012 - 2017.
3. Authorise the Chief Executive to instruct a Ballot Holder to undertake a ballot of appropriate businesses with the Waterfront Business Improvement District area.  
**Reason:** To enable a ballot in the Business Improvement District area to be conducted in accordance with Section 35 of the Representation of the People Act 1983.
4. Delegate to the Chief Executive authority to vote on behalf of the City Council in the Waterfront Business Improvement District ballot.  
**Reason:** To discharge the City Council's responsibilities in relation to the ballot as an occupier within the Waterfront Business Improvement District area in a timely manner consistent with the Business Improvement District ballot programme and in order to achieve the City Council's wider economic and regeneration objectives for the city centre.
5. Delegate to the Chief Executive authority to approve the Waterfront Business Improvement District Contract provided that it accords with the general principles set out in this report.  
**Reason:** To allow the Business Improvement District Contract to be formally signed after the Business Improvement District ballot and in advance of the formal commencement of the new Business Improvement District for the period 2012-2017.

6. PWP will be made responsible for managing Street Trading activity within the Waterfront BID area, with any surpluses generated from street trading, café licenses, events, fairs, festivals being transferred from PCC to PWP following the end of each financial year.  
**Reason:** To enable the PWP (working closely with PCC, promoters, event managers and others) to generate revenues that can then be reinvested for the BID's delivery.
7. The City Council may assist PWP with cash flow over the initial 6 months of its new BID.  
**Reason:** This will ensure that PWP can establish a trading operation and deliver BID projects.
8. Request the Overview and Scrutiny Commission to insert into their scrutiny work programme a review of the Business Improvement District proposals with a view to making a recommendation to the City Council regarding exercising its power of veto.  
**Reason:** To meet the requirements of Regulation 12 of the Business Improvement District (England) Regulations 2004 in relation to the use of the power of veto and to provide independent scrutiny of the Business Improvement District proposals.

**Alternative options considered and reasons for recommended action:**

**Option 1: Progress waterfront management through a different vehicle using a voluntary contributions approach**

This has been rejected by PWP because the anticipated income and levels of commitment would be significantly reduced as a result of differential contributions from different businesses.

**Option 2: Amend some of the assumptions in the Business Improvement District Business Plan**

This was rejected as the level of service provision within the waterfront has to be enhanced above pre-Business Improvement District levels for the duration of the BID Business Plan in order to meet the requirements of the regulations. In addition experience in delivering the City Centre BID Business Plans demonstrates the added value of a realistic but challenging programme of integrated initiatives in leveraging other sources of income above the basic Business Improvement District levy.

**Option 3: Abandon the Business Improvement District Model**

This was rejected as it might mean that some of the services and management to be undertaken by the Plymouth Waterfront Partnership would have to be managed in-house and it is not considered this would achieve value for money or efficient operations.

**Background papers:**

Draft Plymouth BID Business Plan (see [www.waterfrontbid.co.uk](http://www.waterfrontbid.co.uk) )

**Sign off:**

Fin	<b>DevF111 20037</b>	Leg	<b>DVS 13246</b>	HR		Corp Prop		IT		Strat Proc	
Originating SMT Member											

## **1.0 Introduction**

### **1.1 The Waterfront Vision**

Through this report the City Council is responding to the Plymouth Waterfront Partnership's draft Waterfront Business Improvement District Business Plan (2012-17). Approval of the report's recommendations will signal the Council's strong support for the proposed BID and also provide match funding towards the cost of the BID's delivery by the private sector represented by the Plymouth Waterfront Partnership.

Plymouth's Waterfront is the magnificent jewel in the City's crown - by joining forces with key partners the Waterfront BID will be able to maximise this wonderful asset for the benefit of businesses, visitors and the wider city and its economy.

As part of a wider framework, the Waterfront BID will identify and support visitor economy related commercial development opportunities, to enable the Waterfront to become an outstanding visitor destination. This will provide new jobs, better leisure facilities and improved pedestrian, cycling and other transport links with the City Centre, preserve the area's extensive maritime heritage and improve and better maintain public space.

To secure this huge opportunity requires a complete step change in dedicated delivery and management of the area and annual investment from both the private and public sector through the Waterfront BID.

### **1.2 The Waterfront Objectives**

The BID will focus on business priorities of increasing visitor numbers, customer spend and commercial success through:

- Leadership - Providing a strong business voice to lobby and influence for future investment and public realm improvements for the Waterfront.
- Marketing – Regional and national campaigns and more events linked to local businesses, to attract new customers and increase loyalty, whilst radically improving visitor signage and information.
- Operational management – Tough contracts will hold the City Council and all area service providers to account for the standard of existing cleansing, maintenance and other services. BID investment will only be used to pay for additional services prioritised by businesses.
- Finance – Attracting significant match funding in addition to contributions from businesses for expenditure within the Waterfront.

### **1.3 The Waterfront Targets**

The Waterfront BID will help the City to:

- Grow visitor spend by 25% by 2020. This means visitor numbers would increase by 800,000 from 4 million to 4.8 million and visitor spend would rise by £63 million from nearly £252 million to £315 million. Waterfront businesses will be positioned at the heart of this growth.
- Target a 33% growth in jobs in the visitor economy. That means 2,800 new jobs in the city by 2020 and 4,000 new jobs by 2026. Again, with the Waterfront securing much of this uplift.

- Strengthen Plymouth's position as the regional centre for Devon and Cornwall, by creating a great day out and evening destination, resulting in increased visitor numbers.

## **2.0 How Will the BID Be Managed?**

The Waterfront BID will be managed by PWP which will be directly accountable to Waterfront businesses for the co-ordination of the Waterfront area and the successful delivery of the Waterfront BID.

The Waterfront BID's governance will be the responsibility of the PWP Board with operational matters overseen by the Waterfront BID Stakeholder Advisory Board, giving Waterfront businesses and other stakeholders control in formulating strategy and overseeing BID project delivery. In addition, as a member of the PWP, businesses will also have a vote on major decisions.

Business BID Levy contributions will be spent entirely to service the area within the boundary of the Waterfront BID. This will ensure fair representation for businesses investing within their own areas.

The Waterfront BID will encompass the core areas of the Barbican, Sutton Harbour, The Hoe, Notte Street, Vauxhall Street. It may also include Bretonside and Sutton Road.

## **3.0 The Costs to Businesses**

In February 2012 the businesses will have to decide whether to vote Yes or No to fund delivery of the final Waterfront BID Business Plan. If a majority of businesses vote Yes, then all businesses in the BID area will be required to contribute an annual BID Levy payment, based on the rateable value of the premises that the business occupies.

The proposed annual BID Levy is based on 1.5% of a business property's rateable value (RV). For example, if the RV is £30,000 a business will pay £450.00 per annum, that's £8.65 per week.

50% of businesses within the Waterfront area will pay less than £500 per annum. 30% of businesses within the area will pay less than £100 per annum.

## **4.0 The Development of the BID**

The BID Business Plan has been driven at every stage by business owners and managers seeking to improve their trading environment and profitability.

PWP has listened to business concerns, ideas and priorities, evolving this BID Business Plan from a highly structured, detailed, democratic consultation process, involving a number of key stages

The total budget (direct contributions plus match funding) will be invested to drive customer numbers and spend by more effectively marketing the Waterfront, improving the visitor experience and maximising the economic potential of the city's most spectacular asset.

The Plymouth Waterfront Business Improvement District Business Plan and the proposed projects within it are the result of extensive consultation with Waterfront businesses on what they want.

## 5.0 Value for Money

If a majority of businesses vote yes, all 600 identified businesses within the Tourism, Leisure, Retail and Professional Services sectors in the Plymouth Waterfront area will be required to contribute through a Levy. The Plymouth Waterfront Partnership will then aim to secure match funding which could multiply the five-year investment from £1 million to £6.2 million.

Based upon rateable value, the average Waterfront business will pay an annual levy of £353 (£6.79 per week ) in return for significantly higher benefits in terms of visitor spend and other advantages.

Based upon existing rateable values within the Waterfront area:

33% of businesses will pay less than £100 per year

54% of businesses will pay between £100 and £500 per year

7% of businesses will pay between £500 and £1,000 per year

5% of businesses will pay between £1,000 and £5,000 per year

1% of businesses will pay more than £5,000 per year

## 6.0 Projected Budgets over 5 years

Total Estimated Levy Income from  
Waterfront Businesses £1,025,000

Total value of existing City Council  
Services and Match Funding £2, 032,000 (anticipated)\*

Total Other Match Funding  
e.g. subscriptions, trading income,  
grants, etc £3,148,000 (projected)

**Total 5 Year Project Expenditure £6,205,000 (projected)**

\*Based upon current projected budgets which could be subject to change.

### 6.1 City Council contributions – financial and in kind

Assuming the Waterfront BID is successfully established, Plymouth City Council will contribute the following match funding over the 5 years of the BID's lifetime:

Plymouth City Council Funding	Value	Existing or New Resources	Cash or In Kind
Seconded Staff	£148,000	Existing	Cash
Environmental Services	£600,000	Existing	In Kind
Office, ICT and Business Admin	£125,000	Existing	In Kind
BID Levy Collection	£50,000	New	In Kind
Maritime Services	£496,000	Existing	In Kind
Car Park Improvements	£436,000	Existing	In Kind
Grounds Maintenance	£177,000	Existing	In Kind

Total of in kind and match funding c.£2,032,000.

In addition, the City Council is asked to contribute projected match funding as follows:

Plymouth City Council Match Funding	Value	Existing or New Resources	Cash or In Kind
Hoe Park Events	£425,000	Existing	In Kind
Street Trading Surplus	£350,000	New	Cash
Local Transport Sustainability Fund (Signage)	£350,000	Existing	In Kind

Total in kind and match funding is c.£1,125,000.

In addition, PWP will be made responsible for managing Street Trading activity within the Waterfront BID area, with any surpluses generated from street trading, café licenses, events, fairs, festivals being transferred from PCC to PWP following the end of each financial year.

The City Council may assist PWP with cash flow over the initial 6 months of its new BID in order for it to establish a trading operation and delivery of BID projects.

## **6.0 Why have a Waterfront BID?**

The implementation of the BID will result in delivery of significant improvements, providing a private sector-led approach to managing the Waterfront area and attracting more visitors and customer spend.

## **7.0 How will the Waterfront BID maximise its impact?**

The BID Levy will be paid by every business and ring fenced for projects identified in the final BID Business Plan.

The BID Levy is match funded by Plymouth City Council and other partners to generate further funds from additional sources. This Waterfront BID aims to lever £2 of additional match funding for every £1 of BID levy received from businesses within the Waterfront BID area, to maximise the delivery of project and service improvements.

## **8.0 Waterfront Service Baselines**

The proposed Waterfront BID projects and services will be entirely additional to any services already delivered by Plymouth City Council. PWP will establish a contractual agreement with Plymouth City Council to regularly review Council services delivered within the Waterfront BID area. Once the Waterfront BID has been established, the Council will be contractually obliged to maintain agreed standards to confirm to baseline service level agreements for the following services:

- **Safety**
- Closed Circuit Television (CCTV)
- Community safety and management
- Licensing and enforcement
- Street lighting



- **Cleanliness**
- Graffiti and fly posting removal
- Gully cleansing
- Power washing, e.g. planters/litter bins
- Public conveniences
- Street cleansing (inc. bin emptying/washing)
- Waste collection (Trade and Domestic)
  
- **Promotion**
- Attractions (inc Smeaton's Tower, Elizabethan House and Merchant's House)
- Events and Tourist Information Centre marketing
- Mount Wise and Tinside Lido
  
- **Statutory**
- Environmental health
- Planning
- Plymouth Trading Standards Service
- Environmental health
  
- **Other Services**
- Administrative support
- Car parking
- ICT provision and office space
- Major events
- Maritime services
  
- **Maintenance**
- Grounds maintenance (inc. weed spraying)
- Highways maintenance and management
- Traffic signals and pedestrian crossings
- Trees and landscape development
- Waterfront slipways

## **9.0 Waterfront BID Ballot**

All non-domestic rate paying businesses within the proposed BID area will be eligible to vote on the final Waterfront BID Business Plan. A four week postal ballot will be held between February 1 and March 2, 2012.

Each person entitled to vote in the Waterfront BID ballot shall have one vote in respect of each hereditament in the geographical area of the Waterfront BID on which non-domestic rates are payable.

The ballot will have to meet two tests. First, a simple majority (above 50%) of those voting must vote in favour. Second, those voting in favour must represent a majority of the aggregate rateable value of hereditaments voting.

The ballot papers will be forwarded to those ratepayers who are eligible to vote on 1st February 2012 and must be returned by 5pm on 2nd March 2012.

### **10.0 The Waterfront BID Levy, Liability and Collection**

The Waterfront BID Levy will be payable by all businesses located within the boundary of the defined Waterfront BID area.

The Waterfront BID Levy will be set on the 1st April 2012, based on the rateable value shown in the 2010 Local Non-Domestic Rating list, updated for any changes in ratepayer appeals, additions and removals from the list to date. For new assessment, splits and mergers (of rateable values) brought into the list between 1st April 2012 and 31st March 2013, the rateable value used will be that as shown in the Non-Domestic Rating 2010 at the date the new or amended assessment is brought into that list. The Waterfront BID Levy will not be adjusted to reflect any changes to the rateable value during 5 years of the Waterfront BID. In addition any "Taken out of Rating" cases will be deleted from the effective date as advised by the Valuation Office Agency to the City Council's Non-Domestic Rates section. The Waterfront BID levy will be increased each year by the annual inflationary factor for Local Non-Domestic Rate bills as calculated by H.M. Government.

The following types of businesses within the Waterfront BID area will be exempt from paying the BID Levy:

Commercial car parking spaces that are rated separately; concessions; on-street traders, kiosks and promotions; telephone masts, and advertising poster drums. The Waterfront BID Levy will not be reduced where the ratepayer is a charity or non-profit making organisation. The BID levy will also not be affected by the Government's Small Business Rate Relief Scheme which came into effect on 1st April 2005. The Waterfront BID Levy is payable on the whole rating assessment irrespective if part or all of it is empty. In the case of empty properties, the Waterfront BID levy will be collected at 100% from either the owner or leaseholder (if an occupational lease exists).

The BID levy will be collected by Plymouth City Council annually on 1st April. The Council will reimburse the PWP with BID Levies on a monthly basis. The average BID Levy collection rate will be 1.5%.

### **11.0 Governance and management**

The current PWP Board of Directors will represent all business sectors currently operating in Plymouth. This will occur by co-option until the first Annual General Meeting. BID Members will be eligible to vote at Annual General Meetings. The full board will meet at least quarterly.

The Waterfront BID Sounding Board management committee will meet regularly and will be responsible for the delivery of BID projects, with operational sub-groups covering specific themes and projects.

## **12.0 Alteration of BID Arrangements**

The Waterfront BID area and the BID Levy percentage (other than inflationary increases announced by Government for NNDR) cannot be altered within the five year lifetime without an Alteration Ballot.

The Waterfront BID projects, headings, costs and timescales can be altered by the Board, within the constraints of BID income - providing that the Waterfront BID's aims are adhered to.

The Waterfront BID Sounding Board management committee and any sub-groups will manage budgets within their areas of speciality.

## **13.0 Commencement and Duration of the BID**

The Waterfront BID's first term will start on 1st April 2012 and will operate for five years.

A postal ballot of business ratepayers in the Waterfront BID area, based on the list of non-domestic ratepayers, will take place between 1st February and 2nd March 2012. The result of the ballot will be publically announced by 8th March 2012.

If the Waterfront BID proposal is approved, it will operate for five years from 1st April 2012 until 31st March 2017. At or before the end of this period, the Board may choose to seek renewal of the Waterfront BID's mandate.

## **14.0 Projects Identified by Waterfront Businesses**

Since October 2010, the Plymouth Waterfront Partnership (PWP) has surveyed more than 800 Waterfront businesses, held 121 consultation meetings and organised a major Waterfront Business conference. The Waterfront Business Plan and projects within this summary document are the result of the priorities identified by businesses.

### ***Permanent and Dedicated Management***

Establish a Waterfront management structure accountable to businesses to prioritise and deliver benefits for all users. Taking control of the trading environment by co-ordinating and championing business and partner efforts to regenerate the area, whilst working in partnership with and holding the City Council to account for delivery of existing services.

### ***Improve Marketing***

Deliver a five year marketing plan to position Plymouth's Waterfront as a major UK visitor destination targeting new markets including day visitors, short breaks and the US East Coast visitor market. Improved website and visitors guides, promoting Plymouth's waterfront, sailing events and the city as a national conference destination including conference enquiry handling.

### ***Major Events***

Establish a major Summer Shore-side Events Programme, by creating on-shore events that complement existing on-water sports, delivering themed weekend activities and drawing prestigious tall ships. Creating a major new event with international profile to extend the Summer season into September.

### ***Visitor Welcome, Access, Signage and Information***

Dramatically improve signage and interpretation to tell Plymouth's many stories. Develop enhanced pedestrian and cycling links between the City Centre and Waterfront. Seek to deliver additional, free short term berthing to increase yacht visits. Create linked boat, cycle and pedestrian trails.

### ***Safer Waterfront***

Work with partners to employ a new Evening and Night Time Economy Manager. Deliver improved management and promotion of shops, pubs and late licensees. Provide a dedicated 24 hour hotline with a one hour rapid response. Create family orientated Bank Holiday weekends.

### ***Cleaner Waterfront***

Ensure that the Council's cleansing standards are maintained and operationally manage existing Council cleansing staff to ensure a Waterfront rapid response clean team with highly visible blue Waterfront uniforms. Employ a Waterfront Caretaker to promptly tackle urgent maintenance, painting and repairs. Anti-litter campaigns and a community volunteers' programme for regular Waterfront clean ups.

### ***Waterfront Environment***

Develop attractive planting schemes to secure award-winning status and dress vacant shop windows, providing artistic and creative displays. Ensure a repaint of Plymouth's iconic Smeaton's Tower. Provide Christmas illuminations focused on linking the City Centre with the Barbican. Commission a bespoke 'visitor welcome' training programme for Waterfront staff, bus and taxi drivers.

### ***Inward Investment and Regeneration***

Establish an agreed vision for development of key Waterfront sites and seek funding for targeted improvements. Lead economic development in the Waterfront, encouraging new businesses and brands to invest. Coordinate efforts to create mini-destinations nationally famed for their individuality e.g. The Barbican, Sutton Harbour, The Hoe and Royal William Yard.

### ***Lobbying and Influence***

With the power of a strong BID mandate, PWP will use its business voice to lobby for: more static/mobile CCTV cameras; better Barbican street lighting; car parking and gateway improvements; improved maintenance and repair of Waterfront public toilets; tackling waste hotspots including using bin stores and seagull proof bins. PWP will also be the primary consultee for City Council strategies and major planning applications within the Waterfront area.

### ***BID Member Benefits***

Use the buying power of the BID to provide reduced utility and insurance costs; gain increased networking and advertising opportunities; free listing of BID Members on the Visit Plymouth and PWP websites; reduced cost of Chamber of Commerce and Federation of Small Businesses membership; create a Privilege Card for all Waterfront businesses, with promotional offers on entertainment, food and shopping.