



# The effectiveness of non-cash parking policies: A case study on illegal parking practices in the CSB mall

# D Ikhwandari<sup>1\*</sup>, M Azkiyah<sup>1</sup> and F Shafira<sup>1</sup>

- <sup>1</sup> Faculty of Law, Muhammadiyah University of Cirebon, Cirebon, Indonesia
- \*Corresponding author email: ikhwandari@gmail.com

#### **Abstract**

This research examines the implementation of non-cash parking using e-Toll and e-Money at CSB Mall Cirebon as part of the National Non-Cash Movement (GNNT) program. The study employs a qualitative case study method, incorporating literature review, field observation, and regulatory analysis. The findings indicate that while the system improves efficiency, transparency, and user convenience, it still faces significant obstacles, including low levels of digital literacy, limited ownership of e-money cards, insufficient top-up facilities, and technical disruptions. Moreover, illegal parking practices persist due to cheaper fees, weak supervision, inadequate socialization, and socio-economic factors related to low public income. For the system to succeed, improvements are required in digital literacy, the provision of adequate supporting infrastructure, stricter law enforcement, and government policies aimed at expanding formal employment opportunities for the community.

## **Keywords**

Cash parking, CSB mall, Illegal parking, Digital literacy

#### Introduction

Public services in Indonesia continue to evolve through the implementation of the National Non-Cash Movement (*Gerakan Nasional Non-Tunai |* GNNT), which is regulated by Bank Indonesia [1]. The adoption of non-cash payment systems in parking services is intended to improve service efficiency, minimize extortion practices, and strengthen transparency in revenue management within the parking sector [2].

Cirebon Super Blok (CSB)—a complex consisting of a mall, hotel, and shophouses located on Jalan Dr. Mangunkusumo No. 26, Pekiringan Subdistrict, Kesambi, Cirebon City—has operated since November 2011 and has become a lifestyle icon in the city [2]. CSB Mall currently employs an electronic parking system based on e-Toll/e-Money, replacing the conventional paper-ticket system. With *tap-in/tap-out* technology, visitors

**Published:** October 20, 2024

This work is licensed under a Creative Commons Attribution-NonCommercial 4.0 International License

Selection and Peerreview under the responsibility of the 5<sup>th</sup> BIS-HSS 2023 Committee are able to enter and exit the parking area more quickly, efficiently, and with minimal physical contact [3].

Despite this development, illegal parking practices remain widespread in the surrounding area. These practices not only cause financial losses for mall management but also reduce potential local government revenue derived from parking retributions. Illegal parking is in violation of Law Number 22 of 2009 on Traffic and Road Transportation [4], as well as the Cirebon City Regional Regulation on Parking Management [5].

Therefore, this study seeks to examine the effectiveness of the non-cash parking policy at CSB Mall Cirebon and to analyze the obstacles encountered in enforcing the law against illegal parking practices in the area.

#### Method

This study employs a qualitative descriptive case study approach to gain an in-depth understanding of parking management practices, particularly the implementation of the electronic parking system based on e-Toll/e-Money at CSB Mall Cirebon. Data were collected through academic literature review, direct field observations of electronic parking practices, and online news reports from local media in Cirebon. The analysis also draws upon relevant legal provisions, including Law Number 22 of 2009 on Traffic and Road Transportation [6] and Law Number 28 of 2009 on Regional Taxes and Retributions [7]. Through this approach, the research aims to provide a comprehensive description of the effectiveness and challenges of implementing the electronic parking system at CSB Mall, while also identifying the factors that influence visitors who are not yet actively using e-Toll/e-Money.

#### **Results and Discussion**

### Implementation and challenges of the non-cash parking system at CSB mall

CSB Mall has become one of the central hubs of economic activity in Cirebon City. The project stands on a 4-hectare land area with a total building size of 24,559.58 square meters. The investment value for its construction reached Rp287,338,571,551.90, making it one of the largest retail property investments in the Cirebon region [8]. CSB Mall offers a wide range of commercial and recreational facilities, including Hypermart, Matahari Department Store, Cinema XXI, fashion and electronics outlets, culinary and beauty tenants, as well as children's play areas, a gym, and a ballroom, thereby strengthening its position as a multifunctional destination.

One of the latest innovations marking the progress of facility management at CSB Mall is the adoption of an electronic parking system based on e-Toll and e-Money cards. This system replaces the previous manual, paper-ticket method. With *tap-in/tap-out* technology, visitors can now enter and exit the parking area more quickly, efficiently, and with minimal physical contact [9].

The non-cash parking system, supported by e-money cards and the Parkee application, represents an innovation aligned with the digitalization of public services. The *tap-in/tap-out* mechanism enables users to pay for parking within 3–5 seconds, making it more practical than manual cash or paper-ticket methods. This speed helps reduce vehicle queues, facilitates smoother traffic flow, and enhances user convenience. In addition to efficiency, the system also provides greater security by minimizing the risk of lost cash and payment errors. Furthermore, in the event of vehicle theft or disputes, electronic transaction records allow for easier reporting and investigation by authorities [10].

For mall management, the system increases transparency and accountability, as all transactions are automatically recorded and can be used for reporting, evaluation, and planning purposes. However, the system has not always functioned optimally. In some cases, technical problems have occurred, such as card-reading errors, undetected balances, or system failures during tapping. These disruptions cause vehicle queues, as users may need to attempt several times or seek assistance from parking attendants [11].

#### Factors affecting the low adoption of non-cash parking at CSB mall

The implementation of the non-cash parking system at CSB Mall continues to face several obstacles. The most prominent challenges include low levels of digital literacy, limited ownership of e-money cards, and inadequate access to top-up facilities [12]. Consequently, the success of this system does not solely depend on technological readiness, but also requires continuous education, effective socialization, and the provision of supporting infrastructure to ensure broader adoption [13]. Not all visitors have easy access to e-money cards or nearby top-up services within the mall area, which reduces their willingness to adopt cashless parking. For some, the lack of access to bank accounts or familiarity with digital financial services further hinders e-money card usage. In addition, the perception that digital payments are complicated, combined with insufficient top-up points, diminishes the practicality of the system [14].

Based on interviews, many visitors—particularly two-wheeled vehicle users—prefer parking outside the CSB Mall complex or along the roadside. Such practices contribute to traffic congestion and disorder. A major factor behind the persistence of illegal parking is weak supervision by relevant authorities, such as the Department of Transportation and the Civil Service Police Unit (*Satpol PP*), who are expected to conduct regular and consistent enforcement. This regulatory gap allows illegal parking attendants to operate without fear of sanctions, despite the provisions of Article 275(1) of Law Number 22 of 2009 on Traffic and Road Transportation, which obligates road organizers to ensure order and traffic flow [15].

Most illegal parking attendants come from low-income groups who depend on informal parking activities as their primary livelihood. Limited formal employment opportunities in urban areas make this work a practical choice despite its illegality. For them, informal

parking jobs present low barriers to entry, require no significant capital, and provide quick daily income. This reflects a structural problem in the provision of decent employment for low-income residents. It also illustrates a socio-economic dilemma, whereby economically vulnerable groups turn to informal and unlawful occupations. In principle, the state guarantees every citizen the right to decent work and livelihood under Article 27(2) of the 1945 Constitution. However, in practice, this constitutional guarantee remains far from optimal, particularly for the lower-income population, due to high unemployment rates and limited formal job opportunities [16], [17].

Illegal parking remains attractive because the rates charged are usually lower and the payment process simpler compared to the official non-cash parking system at CSB Mall. In fact, official parking rates have been regulated under the Cirebon City Regional Regulation on Parking Retribution Services on Public Roads, meaning that any charges beyond this regulation constitute a legal violation [5]. The low level of socialization by mall management and local government regarding the benefits and procedures of non-cash parking, as regulated in Bank Indonesia Regulation Number 20/6/PBI/2018 on Electronic Money, also contributes to public reluctance to adopt the system [18]. Furthermore, the persistence of illegal parking practices is often linked to negligence, and in some cases, alleged collusion with certain parties. These illegal levies can be classified as extortion under Article 368 of the Indonesian Criminal Code (KUHP) and are explicitly prohibited under Presidential Regulation Number 87 of 2016 on the Task Force for the Eradication of Illegal Levies [19].

Overall, the participation rate of CSB Mall visitors in using the e-Toll or e-Money-based non-cash parking system remains low due to these combined factors. This demonstrates that the success of the electronic parking system is not determined solely by technological readiness, but also requires improvement in digital literacy, adequate supporting facilities, and sustained public education efforts [20].

#### Conclusion

The implementation of non-cash parking at CSB Mall Cirebon represents an innovation that supports the digitalization of public services while enhancing efficiency and transparency in parking revenue management. This system has the potential to accelerate transactions, reduce vehicle queues, and provide greater convenience for users. However, its implementation still faces several obstacles, including low levels of digital literacy, limited ownership of e-money cards, inadequate top-up facilities, and recurring technical problems with card readers.

At the same time, illegal parking practices around the mall remain widespread due to cheaper rates, simpler payment methods, weak law enforcement, and socio-economic conditions in which low-income groups rely on informal parking work as their primary source of livelihood. Such practices not only result in financial losses for mall management and local government but also constitute violations of the law.

Therefore, the success of non-cash parking implementation cannot rely solely on technological readiness. It requires integrated efforts, including improving digital literacy, providing adequate supporting facilities, strengthening consistent law enforcement against illegal parking, and adopting government policies that expand access to formal employment opportunities for low-income communities. Only through such comprehensive measures can the non-cash parking system achieve its intended goals of efficiency, transparency, and sustainable urban governance.

#### References

- [1] "Bank Indonesia Regulation Number 20/6/PBI/2018 concerning Electronic Money," 2018.
- [2] CP Widna Alzena, A. Marom, and H. Nurcahyanto, "Implementation of the Electronic Parking Program (E-Parking) in Parking Management in Semarang City," *J. Soc. and Political Sciences*, vol. 2, 2024.
- [3] AICSB Mall, "csbmall.instagram.com." 2024.
- [4] "Law Number 28 of 2009 concerning Regional Taxes and Regional Retributions," 2009.
- [5] WK Cirebon, "Procedures for Collecting General Service Fees and Business Service Fees for Parking Services." 2024.
- [6] D. and P. RI, "Law of the Republic of Indonesia Number 22 of 2009," 2009.
- [7] Law Number 28 of 2009 concerning Regional Taxes and Regional Levies . 209AD.
- [8] M. Wieldan, "Feasibility Study on the Cirebon Super Block (CSB) Project in Cirebon City," 2009.
- [9] "CSB Mall.".
- [10] E. Lestari, C. Dyah, S. Indrawati, and A. Subarno, "Implementation of Electronic Parking (E-Parking) in Surakarta City," vol. 7, no. 2, pp. 154–162, 2023.
- [11] D. Saputra and B. Gürbüz, "Implementation of Technology Acceptance Model (TAM) and Importance Performance Analysis (IPA) in Testing the Ease and Usability of E-Wallet Applications," 2020.
- [12] F. Zhafirah, EM Hati, A. Roziqin, and UM Malang, "Institutional Arrangement Approach on E-Parking Innovation in Surabaya City, Indonesia," vol. 15, no. 1, pp. 42–58, 2023.
- [13] M. Zulhimi, "Effectiveness of the Electronic Parking System (E-Parking) in Parking Management in Banda Aceh City," 2023.
- [14] F. Fatmawati, Y. Mulyati, R. Rusliadi, and AN Aina, "Implementation of E-Parking Management Policy in Braga Area of Bandung City," vol. 13, no. 2, pp. 865–876, 2023.
- [15] L. Khoerunnisa, "Implementation of Article 275 Paragraph (1) of Law No. 22 of 2009 concerning Traffic and Road Transportation Regarding Violations of Pedestrian Facilities on Sidewalks in Bandung City," 2019.
- [16] H. Purwanti, "Balance Between Rights and Obligations." 2022.
- [17] Central Statistics Agency, "Cirebon City Open Unemployment Rate (TPT) 2024 is 6.29 percent." 2024.
- [18] GB Indonesia, "State Gazette," no. 70, 2018.
- [19] P. Liar, "State Gazette," no. 202, 2016.
- [20] P. City, WS Province, H. Agustin, and AE Betavia, "User Resistance to Use E-Parking System in Indonesia from the Status Quo Bias Theory Perspective:," vol. 86, no. Icobame 2018, pp. 186–190, 2019.