

21st May 2021

Love Wimbledon Business Improvement District's formal response to Plan Wimbledon's proposal for designation as a Neighbourhood Forum

Love Wimbledon BID is supportive of neighbourhood planning in urban areas, but we have significant concerns about the neighbourhood planning boundary being proposed by Plan Wimbledon and the adopted constitution of the proposed Forum. In particular we are very concerned about the inclusion of Wimbledon Town Centre, as the Central Business District (CBD) within the designation application. To formulate our response, we have sought professional advice on Neighbourhood Planning and consulted with businesses and property owners of Wimbledon on the Plan Wimbledon proposal.

Existing situation and current regulations

There is a lack of clarity in the proposal about the aims and aspirations of Plan Wimbledon with regard to the Town Centre. There is no reference to, or therefore a clear understanding of, the approach or relationship with the existing SPD adopted in November 2020 that has been developed through 8 years of extensive consultation, or indeed the recent consultation on the update to the Local Plan.

Since the launch of Future Wimbledon in 2013, Love Wimbledon BID has invested significant effort to widely consult and influence the development of the masterplan and subsequent SPD. Whilst we don't consider the masterplan to be perfect, we understand the SPD guidance, together with the Local Plan policy framework for the centre, namely policies CS.6, CS.7, CS14 and CS18-20 which are all *strategic* policies and therefore provide a strong statutory basis for planning purposes, with which any neighbourhood plan would have to be in conformity. Yet these current and strategically important documents are not referred to within the Plan Wimbledon proposal.

Wimbledon Town Centre is designated as a Major Centre in the London Plan and indeed is Merton's only Major Centre. It is also designated as a GLA Opportunity Area with Colliers Wood and South Wimbledon in the emerging London Plan. Its role, as a CBD therefore is significant beyond Wimbledon. Having invested so much time and effort relating to the centre's strategic as well as our local role, Love Wimbledon wants to build on what is already there in terms of the SPD Guidance and emerging Local Plan Policies.

Proposed area and size

Love Wimbledon BID welcomes and supports the view of Plan Wimbledon that the Town Centre is vital for accessing local services, shops, workplaces, hospitality, and as a key transport hub. Whilst there is no theoretical limit to the size of a neighbourhood planning area, with over 100 Forums now established in the GLA area, we note that most are in the 10-20,000 population bracket. There are exceptions such as Mill Hill (27,000), Finsbury Park and Stroud Green (30,000), Isle of Dogs (28,000), but these do not include centres of the same planning status as Wimbledon.



The proposed physical boundary and resulting population is of a large 'town' rather than a 'neighbourhood' size & larger than any other neighbourhood area of which we are aware. Whilst populations of 40,000 are more common outside of metropolitan areas – for example in market towns, these are mostly led by Town Councils with a long track record of engagement and delivery.

We have met with the group to discuss our concerns several times. We have been told that Bracknell provides a good precedent for a Wimbledon Neighbourhood Plan. Physically, Bracknell is very different from Wimbledon as a stand alone 'new town' with a purpose built retail/commercial heart surrounded by concentric residential area, a less diverse demographic mix (85% White British), and mobility/transport reliance on the car. It has a Town Council and sits within a unitary authority.

Wimbledon in contrast is part of a national capital, has a distinct CBD with a strategic 'national' transport hub, a large office hub as well as a thriving retail centre which serves Wimbledon and beyond. It has both a town centre AND a village centre and a vastly different demographic across the borough with high density housing adjoining the CBD, a lack of commercial office supply to meet the demand, which is crucial to the footfall of the retail offer for both locals and visitors. Wimbledon also has an established Business Improvement District.

We are aware of no neighbourhood plan designations of the size proposed within a metropolitan borough which have included a major centre with an up to date planning framework. We are aware of smaller retail centres in London boroughs being included but the inclusion of larger centres have been initiated by either business led qualifying bodies (e.g. Central Ealing, Soho, Mayfair) or qualifying bodies with significant business and real estate interests represented (e.g. Hyde Park and Paddington, Finsbury Park and Stroud Green). We are concerned therefore given the present make-up and governance structure of Plan Wimbledon, the boundary and scale is inappropriate and crucially prevents the BID forming a business led qualifying body to progress a neighbourhood plan for the CBD area in the future.

Within the Plan Wimbledon proposed area, representing around a third of the borough of Merton, there is a large disparity of businesses within the area as well as a diverse demographic group of residents. SW19 is the largest postcode in London and the name Wimbledon has international recognition, so it is understandable that people far and wide identify with the name, but the proposed bloated area will create an impractically wide and broad scale of diverse interests to meaningfully consult with, let alone reach agreement and we believe will result in the dilution of meaningful conversations and resultant policies.

Governance

The Plan Wimbledon constitution explains that businesses can join, as single entities but they do not appear to have a vote on the plan as businesses per se. There also appears to be no recognition of property owners or asset managers, which we find surprising given that the proposition to include a major metropolitan centre, but once again most likely relates to the unwieldy size of the proposed area. There is no indication of how the business representation would be meaningful in terms of the governance structure of the proposed forum and Love Wimbledon BID, as a business representative organisation could join only as an associate member, with no voting rights.

Love Wimbledon has been meeting with various representatives of this group over the past three years and have experienced significant anti-BID and anti-business rhetoric, in public meetings, in person and feedback from businesses after representations have been made to them by members of this group. This negativity inevitably brings into question the true agenda of the forum and demonstrates their lack of commitment to full stakeholder engagement and their competency in being able to host an open consultation where all parties are valued and listened to.

Timing of consultation

This six-week consultation launched on April 12th 2021, a not insignificant day for many businesses across England as they re-opened after 4 months of lockdown. Many hospitality businesses have only re-opened

this week, not allowing for a meaningful consultation with these important stakeholders in the town. If Plan Wimbledon were serious about involving members of the CBD area, this timing should have been adjusted to take this into account.

Feedback received by Love Wimbledon

Love Wimbledon has undertaken its own consultation with businesses and property owners and the feedback we have received is resoundingly negative to this proposal.

85% of businesses with a range of commercial interests in Wimbledon do not support a resident led neighbourhood plan covering the CBD area and verbal feedback from a Strategic Leaders Forum yesterday also supported this evidence. We have received statements such as:-

"There is adequate planning control exercised by LB Merton. Further layers of control will add to an already lengthy process and will make Wimbledon a less attractive place in which to invest."

"There is already in place a planning framework, it may not be perfect but it is fair and provides the local neighbourhood an opportunity to put forward their concerns."

"...the existing local and regional planning policy context does this already for Wimbledon Town Centre through policies contained within the New London Plan (which was adopted in March 2021), the Core Strategy and Site and Policies Plan (which are soon to be replaced by the New Local Plan), and the Future Wimbledon Supplementary Planning Document ('SPD') (which was adopted in November 2020). All of these documents have been subject to extensive periods of public consultation, set visions for their specific geography, and strive to deliver growth in the right way. The best example of this is the Future Wimbledon SPD which in many ways has a similar scope to that of a Neighbourhood Plan albeit it is focussed on Wimbledon Town Centre. The Future Wimbledon SPD provides a clear spatial and visual framework for Wimbledon under a series of visions and in many ways identifies broad areas for redevelopment and the design considerations. With that in mind, it is suggested that PlanWimbledon consider re-defining the boundaries of the Neighbourhood Area so that it excludes the area already covered by the Future Wimbledon SPD given the scope of that document and to reflect its very recent adoption."

"I've been a business owner in Wimbledon since 2000 and believe Love Wimbledon has been a great support and behind all the good things that go on in Wimbledon. They are the organisation who will be best for the future of not only the businesses but also the residents"

Customer facing businesses are also reporting to us disingenuous communications and representations about what Plan Wimbledon is and what they are trying to achieve.

Relationships

In spite of the negativity, as mentioned above Love Wimbledon has continued to meet representatives of the group throughout this time and attended public meetings in an effort to keep communications open, however in a recent meeting with members of the steering committee they objected to our independent adviser, someone with long experience of neighbourhood planning attending a meeting.

Love Wimbledon's Proposition

We are determined, working with Merton Council, property owners, businesses, service providers and residents, to maximise our influence over the future spatial development of the Town Centre (i.e. Love Wimbledon BID's agreed boundary) and how the existing 2020 masterplan develops out. Hence it is our longer term aim to pursue a business-led Neighbourhood Forum and Plan which truly reflects business as well as residential issues.

A business-led Neighbourhood Forum and Plan, proposed by Love Wimbledon BID would need support from both residents and businesses in a referendum. The current proposition would not require this, and businesses could only have a say via their employees if they lived locally and, significantly, would not incorporate the views of the real estate property owners. Many existing business-led Neighbourhood Forums have a balance of business and resident representation on their steering groups (e.g. Hyde Park and Paddington, Central Ealing, Mayfair, Spitalfields). We also feel, as an existing community organisation, and

through our extensive business network, that Love Wimbledon is very well placed to facilitate a dynamic dialogue between residents, businesses, and real estate interests.

Love Wimbledon will be seeking advice on the non-strategic policies design, transport, environment and social policies any neighbourhood plan might be able to bring forward in relation to the CBD area to further develop our thinking on this.

Conclusion

In summary, Love Wimbledon cannot support the proposal for Plan Wimbledon's designation as a Neighbourhood Forum with its current structure and a proposed boundary that will include the CBD and BID area. We believe the size of the area is unmanageable, the consultation has been unprofessional and carried out under dubious circumstances, the proposed governance will not be representative of all stakeholders and the implementation of this proposal will fetter progress and development of the CBD.