

LONDON LEGACY DEVELOPMENT CORPORATION

Reduced Area Consultation

Report to the Mayor of London



MAYOR OF LONDON

LONDON LEGACY
DEVELOPMENT
CORPORATION

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1. INTRODUCTION

London Legacy Development Corporation (LLDC) was established in April 2012 as the first ever Mayoral Development Corporation (MDC) under the Localism Act 2011 (“the 2011 Act”), to take forward commitments made in the original London 2012 bid in relation to the physical and socio-economic regeneration of Stratford and the surrounding area. It became a planning authority within its Mayoral development area on 1 October 2012.

Under Section 215 of the 2011 Act, the Mayor of London is required “...to review, from time to time, the continuing in existence of any existing MDCs”. Accordingly, the Mayor asked the LLDC Board to bring forward recommendations in relation to the future of LLDC.

In September 2022, the Mayor of London, via Mayoral Decision 3015, approved a recommendation to remove LLDC’s Town Planning functions from 1 December 2024 subject to the necessary Parliamentary procedures; and for LLDC to maintain its status as a Mayoral Development Corporation beyond 1 April 2025 with a reconstituted Board and governance structure and (subject to consultation) a reduced Mayoral development area from the same date.

The Mayor of London asked LLDC to conduct a consultation, on his behalf, on his proposal to reduce the Mayoral development area covered by LLDC to the core part of the Queen Elizabeth Olympic Park estate in which LLDC owns, manages or operates land, from 1 December 2024.

The consultation was live on the Queen Elizabeth Olympic Park website from 7 March to 9 May 2023. Section 199 (2) (a) of the 2011 Act specifically requires the Mayor of London to

consult the London Assembly in relation to any proposed alterations to a Mayoral development area. LLDC contacted the Chair of the London Assembly directly with an invitation to discuss the proposed reduction of the LLDC area. LLDC officials presented an informal briefing to the London Assembly Planning and Regeneration Committee on 19 April 2023, and the LLDC Chief Executive, Lyn Garner, and Executive Director of Regeneration and Community Partnerships, Paul Brickell, appeared before a special Plenary session of the Assembly on 18 May 2023.

Section 199 (2) (b) provides that the Mayor must consult any other person whom the Mayor considers it appropriate to consult. The consultation was drawn to the attention of individuals or groups who were consulted in relation to the original designation of LLDC as an MDC, under 197(4) of the Localism Act 2011. This included each constituency member of the London Assembly whose Assembly constituency contains any part of the existing Mayoral development area; each Member of Parliament whose parliamentary constituency contains any part of the existing area; and each London Borough Council whose Borough contains any part of the existing area (also referred to as the Growth Boroughs). It was additionally drawn to the attention of other stakeholders with a particular interest in the future of LLDC and Queen Elizabeth Olympic Park, via the LLDC stakeholder newsletter and strategic fora such as the Park Panel through which LLDC engages with local organisations and groups.

This report summarises the responses received from the consultation and presents a recommendation to the Mayor of London on this basis.

2. BACKGROUND

The [LLDC Reduced Area Consultation document](#) sets out the background to the establishment of LLDC on 1 April 2012 and its achievements to date. It discusses the next phase of Queen Elizabeth Olympic Park from 2025, and the implications this will have for the evolution of LLDC as an organisation. It sets out the rationale for the proposal to reduce the LLDC Mayoral development area, the various options that were considered in developing the proposal, and the views of key partners who would be affected by the change.

The proposal to reduce the LLDC Mayoral development area from 1 December 2024 to the core part of the Queen Elizabeth Olympic Park estate in which LLDC owns, manages or operates land, is based on the following considerations:

- The revocation of all LLDC's Town Planning functions and the return of these to the relevant Boroughs on 1 December 2024, meaning that all planning applications after this date will need to be made to the Borough in which a site is located. This removes a key rationale for the broader geographical area for which LLDC is currently responsible;
- The anticipated completion of a number of core developments in the wider LLDC area by 2025, for example a new neighbourhood centre at Hackney Wick Central around the recently upgraded Hackney Wick Station will be nearing completion;
- The increasingly effective collaborative working between LLDC and the Boroughs on shared priorities, particularly on the inclusive economy agenda;
- The growing number of academic, cultural, business and community partners establishing themselves in and around Queen Elizabeth Olympic Park with the potential to play a significant role in the ongoing delivery of London 2012 commitments; and
- The views of Park partners and other key stakeholders.

In developing the proposal consideration was given to the continued inclusion in the reduced area of four areas of land: land owned by the Lee Valley Regional Park Authority (LVRPA), which includes parklands, the Lee Valley VeloPark, and the Lee Valley Hockey and Tennis Centre at Eton Manor; East Village; Westfield Stratford City; and International Quarter London (IQL).

Following discussions with stakeholders relevant to these areas, LLDC's recommendation is that these should not be included in the proposed reduced Mayoral development area. The principal rationale for this is that, once Town Planning functions have been returned to the Boroughs, LLDC will have no other role in relation to these areas and there will no longer be a rationale for inclusion.

The partner landowners responsible for these areas (LVRPA, Lendlease for IQL, Delancey for East Village, and Westfield) have confirmed that, while they wish to retain a strong strategic relationship with LLDC, they do not believe it is necessary to be within the LLDC Mayoral development area in order to achieve this. In light of this advance engagement these partners did not formally respond to the consultation.

3. OVERVIEW OF RESPONSES AND RECOMMENDATION TO THE MAYOR OF LONDON

A total of six responses were received to the consultation, from:

- **London Assembly**
- **London Borough of Hackney**
- **London Borough of Newham**
- **London Borough of Tower Hamlets**
- **London Borough of Waltham Forest**
- **Mayor Rokhsana Fiaz, Chair of the Growth Borough Partnership¹**

All six respondents were supportive of the proposal to reduce the LLDC Mayoral development area from 1 December 2024 to the core part of the Queen Elizabeth Olympic Park estate in which LLDC owns, manages or operates land.

Areas for omission or retention

Respondents were asked whether there are any areas of the proposed reduced LLDC Mayoral development areas which should be omitted. No areas for omission were identified.

Respondents were asked whether there are any additional areas within the current Mayoral development area that should be retained. The London Borough of Newham suggested that Rick Roberts Way should be included, as LLDC will continue to have significant land ownership and development activity in this area. LLDC has discussed this directly with the London Borough of Newham.

Rick Roberts Way includes a development site currently owned by LLDC, along with sites owned by the London Borough of Newham, St William, and GLP Europe. Procurement is nearing conclusion to appoint a developer to deliver

approximately 450 new homes, as well as ancillary retail and community space, on LLDC's land. The residential development is anticipated to start on site in 2025 and be completed by 2028. It has been agreed that LLDC will dispose of its freehold ownership of the site on practical completion. This means that LLDC will own the land and manage its delivery under the terms of the Development Agreement until it is built out, at which point it will be transferred.

LLDC understands that Newham's principal concern in relation to Rick Roberts Way is to ensure that close collaboration with LLDC is maintained, and that progress with development of the site is not impacted by its exclusion from the LLDC Mayoral development area. LLDC has been able to provide firm reassurances on both these issues.

LLDC's commitment to the successful development of the site will remain regardless of whether it is within or outside its formal Mayoral development area. To this end, LLDC has coordinated the completion of an Urban Design and Landscape Framework for the combined LLDC, Newham and St William sites, and has more recently commissioned a public realm study with the adjacent landowners. More broadly, LLDC has been able to reassure Newham that it will retain an ongoing leadership and coordination role in relation to delivery of the long-term vision for Queen Elizabeth Olympic Park and the surrounding area, which means that its focus will not be limited by the physical boundary of its Mayoral development area.

The recent Queen Elizabeth Olympic Park Fixed Estate Charge (FEC) Review, undertaken by the Deputy Mayor of Planning, Regeneration and Skills to look at the charging model used for the upkeep and maintenance of the Park and its venues, specifically considered Rick Roberts Way and its geographical position to determine whether it should be included in the

¹ The Growth Borough Partnership is the formal governance body overseeing the input of the four Boroughs neighbouring Queen Elizabeth Olympic Park (Newham, Hackney, Tower Hamlets and Waltham Forest) to planning for the future of LLDC and the Park.

FEC boundary. This concluded that the physical barrier of Stratford High Street means that the benefits of the Park cannot be said to be the same for Rick Roberts Way as for those neighbourhoods which are within or adjacent to the Park boundary. As a result, the decision was taken to exclude Rick Roberts Way from the FEC boundary, meaning that future residents will not be liable to contribute to the upkeep of Queen Elizabeth Olympic Park. This is a position supported the London Borough of Newham. The points made in relation to its exclusion from the FEC boundary apply equally to the Mayoral development area, and to include the site within the latter but outside the former would be unusual.

Having confirmed the ongoing strong collaboration between LLDC and Newham to drive successful development of Rick Roberts Way, but with LLDC having no long-term ownership of any land at the site beyond 2028 and residents in the neighbourhood not being liable to contribute to the upkeep of Queen Elizabeth Olympic Park through payment of the FEC, LLDC proposes that Rick Roberts Way remains outside the reduced Mayoral development area. The existing delivery strategy for the site will be unaffected by this change, and LLDC and Newham will continue to work closely together to deliver this in line with the agreed timetable.

Other points raised

The response from the London Assembly, while supportive of the proposal to reduce the LLDC Mayoral development area, sets out a number of broader recommendations in relation to the future of LLDC and Queen Elizabeth Olympic Park. The Assembly has requested a response from the Mayor of London to these prior to implementing the proposed change. LLDC will support the development of a formal response to these recommendations in line with timescales agreed with Assembly officers.

The responses from the Growth Boroughs recognise the ongoing positive partnership working with LLDC to secure the long-term success of Queen Elizabeth Olympic Park, as reflected in the Memorandum of Understanding signed between the GLA, LLDC and the four Growth Boroughs in October 2022.

There are a number of common themes raised in responses from the Growth Boroughs, which are already under active consideration as part of ongoing work on the next phase of the Queen Elizabeth Olympic Park and the evolution of LLDC. These are summarised below and set out in more detail in Section 4:

- The importance of the London Borough of Waltham Forest continuing to shape activity around the Park and connect its residents to the opportunities it presents;
- The continued role of Park partners in generating economic benefit and access for local residents;
- The ongoing need to ensure that the benefits of regeneration in the Park are fairly distributed, and that the needs of local communities are met;
- The need for transparency around what is delivered in and around the Park, and the contribution local residents can make;
- The importance of timely implementation of the recommendations of the recent Fixed Estate Charge (FEC) review, in particular in relation to transparency, democratic accountability, and the extent to which local residents fund and benefit from activity in the Park;
- The importance of LLDC retaining an ongoing leadership and coordination role in relation to delivery of the long-term vision for Queen Elizabeth Olympic Park, and continuing to act as a convenor, advocate and promoter of the area as a Great Estate.

With no objections to the proposal via the LLDC Reduced Area Consultation, LLDC therefore recommends that the Mayor of London formally approves the reduction of the LLDC Mayoral development area from 1 December 2024 to the core part of the Queen Elizabeth Olympic Park estate in which LLDC owns, manages or operates land.

4. SUMMARY OF RESPONSES

LLDC invited views on the proposed reduction of the LLDC Mayoral development area and welcomed written responses to four specific questions. This section summarises the responses received. Not all respondents structured their input in line with the four questions; points have been included under the most appropriate question as far as possible.

Question 1: Do you agree that the Mayoral development area covered by LLDC should be reduced to include the core part of the Queen Elizabeth Olympic Park estate in which LLDC owns, manages or operates land.

All respondents responded positively to this question.

Of particular note was the recognition by the London Borough of Waltham Forest that the proposed reduced area would exclude land owned and managed solely by Lee Valley Regional Park Authority, meaning that no land would be included within the administrative boundary of Waltham Forest. Notwithstanding this, the Leader of Waltham Forest Council reiterated a commitment to continuing to play a central role in future decisions about the area which will greatly affect the residents, businesses and wider communities of the Borough. This was echoed in the responses from the other Growth Boroughs.

A consequence of the removal of Waltham Forest land from the LLDC Mayoral development area is that the Borough would no longer have a statutory place on the LLDC Board. The Leader of Waltham Forest Council reiterated the request, made to the Mayor of London on 10 February 2022, for non-statutory representation on the Board. This is echoed in the response from the London Assembly, which recommends that

Waltham Forest maintains an advisory place on the LLDC Board.

The Localism Act 2011 is clear that only those Boroughs that have territory within an MDC area should be represented on an MDC Board. LLDC supports the position of the Mayor of London, set out in his letter to the Leader of Waltham Forest Council on 23 February 2022, in this regard. This states that a seat on the LLDC Board would not be necessary to ensure that Waltham Forest residents benefit fully from development at Queen Elizabeth Olympic Park. Instead, the Mayor's suggestion is that a meaningful Memorandum of Understanding should be drawn up to set out how a 'special relationship', short of Board membership, can be nurtured between Waltham Forest and LLDC to ensure the protection of social and economic benefits for Waltham Forest residents.

Waltham Forest have requested that this 'special relationship' includes appropriate integration to proposed new LLDC Inclusive Economy sub-committee, in view of the significant work that Waltham Forest has undertaken in recent years to connect its residents to jobs and training activities at Queen Elizabeth Olympic Park. LLDC is happy to support this. It has already been agreed that one of the three Growth Borough Mayors will chair the Inclusive Economy sub-committee to oversee progress in this area.

The Growth Borough responses additionally raise the need for local voices to be represented in decision-making structures going forward. This is in line with the recommendations of the recent FEC Review and principally affects developments which fall within Borough boundaries but will be retained within the LLDC Mayoral development area, for example, East Wick in Hackney and Sweetwater in Tower Hamlets. The Boroughs emphasise the need for them to play an active part in discussions about ongoing management arrangements about these sites, and about the handover of assets such as highways and bridges on completion.



The response from Hackney notes that some elements of historical land transactions made under the Olympic Land Agreement as part of preparation for the London 2012 Games may still require completion. It acknowledges that this is under active discussion and should ideally be completed in line with the timing for the proposed reduction of the Mayoral development area. This is noted by LLDC.

The response from Tower Hamlets suggests that, on the basis that the LLDC Mayoral development area is defined by ownership, management and operation of land, it should be reviewed further at such point that these responsibilities are altered by the completion of development platforms. LLDC will take this point into account.

The response from Newham emphasises the need to be clear about what the future LLDC will look like after the reduction in the Mayoral development area. It underlines the importance of LLDC retaining its focus on driving growth and opportunity in east London and continuing to partner with neighbouring Boroughs to ensure that the Park continues to deliver shared strategic aims. The Reduced Area Consultation document provides some detail about the focus of the evolved LLDC; this is something which will be further developed with oversight from the LLDC Board on which the Borough Mayors and Leader all have a seat.

The response from the London Assembly requests a timeline to provide clarity on the future of LLDC, including an end date to its status as an MDC. This will be taken forward directly with the London Assembly.

Question 2: Are there any areas of the proposed reduced LLDC Mayoral development area which you think should be omitted, and why?

No areas were suggested for omission from the proposed reduced LLDC Mayoral development area.

The response from Tower Hamlets reiterates the points made above in relation to the Sweetwater development. The response from Hackney notes that Here East and Plexal will remain within the LLDC Mayoral development area, and emphasises the need for future governance arrangements for LLDC and the delivery and resourcing of inclusive economy initiatives to ensure that opportunities presented by these and other Park partners can be effectively harnessed for the benefit of local residents.

Hackney supports the retention of the Wallis Road pedestrian bridge within the proposed reduced Mayoral development area.

Question 3: Are there any additional areas within the current Mayoral development area which you think should be retained, and why?

Section three of this report outlines the suggestion from the London Borough of Newham that Rick Roberts Way should be retained within the reduced Mayoral development area, and the reassurance that LLDC has been able to give Newham about its ongoing commitment to development of the site. On this basis LLDC proposes that Rick Roberts Way remains outside the reduced Mayoral Development area.

As above, the rationale for the exclusion of Waltham Forest land has been accepted by the Growth Boroughs on the understanding that the Borough would continue to play a part in shaping activity in and around Queen Elizabeth Olympic Park, and that Waltham Forest residents would continue to be connected to the opportunities this presents. While non-statutory membership on the LLDC Board remains the preferred mechanism of all Growth Boroughs to achieve this, integration into the Inclusive Economy sub-committee and the development of a robust 'special relationship' enshrined in a Memorandum of Understanding, is felt to be an acceptable alternative.

There were no objections raised to the exclusion of land at East Village, Westfield Stratford City, and International Quarter London. Growth Borough responses highlight the need to ensure that socio-economic opportunities produced in these areas are closely tied to local residents via LLDC's partnership and governance arrangements.

The response from Hackney notes that the proposed reduced Mayoral development area would no longer include the Hackney Wick Masterplan sites. It requests the continued support of LLDC to ensure the success of the neighbourhood centre and the delivery of masterplan principles in Hackney Wick and Fish Island, including the Creative Enterprise Zone initiative. Where relevant, it also emphasises the need for the Borough to be kept involved in discussions on any housing management and community issues after freeholds are transferred to Notting Hill Genesis at practical completion.

The response from the London Assembly notes that 3 Mills Studio is not included in the proposed reduced Mayoral development area, but that LLDC has provided assurances that it will continue to hold the studio as an asset while this is consistent with its long term financial plan, and will continue to collect any revenue

generated. The London Assembly has requested more information about how 3 Mills Studio will be managed in future.

Question 4: Do you believe the proposal to reduce the LLDC Mayoral development area brings risk to the ongoing delivery of London 2012 commitments and the vision for Queen Elizabeth Olympic Park?

While no specific risks were raised in relation to the proposal to reduce the LLDC Mayoral development area, a number of observations were made in relation to the future of Queen Elizabeth Olympic Park more broadly.

The responses from the Growth Boroughs all make the point that there is some way to go to achieve the ambitions of the QEOP vision and address entrenched issues of inequality. They state that partners should continue to increase their ambition and the scale of what can be achieved, and that the right structures and partnerships – with partners both inside and outside the proposed reduced area – will be crucial to better connect local communities to the opportunities arising from growth. They commend the work led by the Inclusive Economy working group, which comprises representation from LLDC and the Growth Boroughs, in this area. Key issues to resolve are highlighted as resourcing, funding and governance of the delivery of inclusive economy objectives in and around Queen Elizabeth Olympic Park. LLDC's ongoing leadership and coordination in delivering the vision for Queen Elizabeth Olympic Park is recognised as being of continued critical importance.

The need for expedited implementation of the recommendations of the recent FEC Review is another common theme, in particular in relation to greater transparency around charging, increased engagement with local residents, and pathways to better incorporate local voices.

The response from the London Assembly emphasises the importance of maintaining strong community engagement and participation in the development process. It urges LLDC to provide detail on how the recently established Community Review Panel will be managed and maintained after 1 December 2024, and encourages the retention of other existing resident structures such as the Built Environment Access Panel. The future of these groups are all under active consideration.

5. NEXT STEPS

A Mayoral Decision request will be submitted in line with the recommendation in this paper.

If the Mayor approves this recommendation, he will be requested to notify the Secretary of State for Levelling Up, Housing and Communities. The Secretary of State will then be under an obligation to prepare a statutory instrument to substitute a new map in SI No.310/2012 setting out the reduced Mayoral development area, and to submit this for Parliament's approval under the negative resolution procedure.

The reduction of the LLDC Mayoral development area is not expected to have any significant negative impact on anyone with protected characteristics under section 149 of the Equality Act 2010. The Mayor of London's Equality, Diversity and Inclusion Strategy will continue to inform LLDC's vision and mission for Queen Elizabeth Olympic Park.



