

GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION – MD3202

Title: London Legacy Development Corporation Transition – approval of reduced Mayoral development area

Executive Summary:

The London Legacy Development Corporation (LLDC) is a Mayoral Development Corporation established in 2012 by statutory instrument under the Localism Act 2011. As described in MD3015 (Appendix 1), LLDC was authorised to undertake a consultation on the Mayor's proposals for a reduction in LLDC's Mayoral development area (MDA). The consultation has concluded, and the consultation report is attached (Appendix 2). Approval is sought for the MDA to be reduced in size (to be effective from 1 December 2024) and for the necessary notification to the Secretary of State for Levelling Up, Housing and Communities to be given.

Decision:

That the Mayor in accordance with his powers set out in section 199 (1) of the Localism Act 2011:

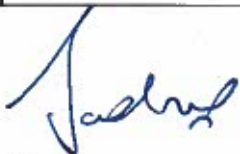
1. having considered the consultation report on the proposed reduction in the Mayoral development area (Appendix 2), the Equalities Impact Assessment (Appendix 4), and all the information and advice in this Decision document, and having decided that no further information is needed to support his decision
2. having made the decision in MD3015 that from 1 December 2024 the London Legacy Development Corporation (LLDC) shall cease to exercise, as regards the whole of its Mayoral development area (MDA), the entirety of the town-planning functions conferred on it by SI 2012/No.2167, and subsequently notified the relevant Secretary of State by letter
3. makes an alteration to the boundary of LLDC's MDA so as to exclude the land as set out on the map at page 10 of the Reduced Area Consultation (Appendix 3) to take effect from 1 December 2024 and authorises:
 - (a) publication of the alteration
 - (b) notification of the alteration to be given to the Secretary of State by letter
 - (c) notification of the alteration to be given to the LLDC.

Mayor of London

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Date:

20/12/23

PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR

Decision required – supporting report.

1. Introduction and background

Background

- 1.1. The London Legacy Development Corporation (LLDC) was the first ever Mayoral Development Corporation (MDC) established under the Localism Act 2011 and was created to take forward commitments made in the London 2012 Olympic and Paralympic bid in relation to the physical and socio-economic regeneration of Queen Elizabeth Olympic Park (QEOP) and its surrounding area. The statutory instrument which created LLDC, SI 2012/310, referred to a map (Appendix 5) demarcating the geographic extent of the Mayoral development area (MDA) encompassing the site of the QEOP and surrounding areas. Town planning powers were granted to LLDC by a further statutory instrument, SI 2012/2167 (“the 2012 Order”).
- 1.2. On 1 April 2012, LLDC took on all the property, rights and liabilities of the Olympic Park Legacy Company Limited, and property, rights and liabilities located in the LLDC MDA from London Thames Gateway Development Corporation¹.
- 1.3. The current LLDC MDA is the QEOP and neighbouring districts including Hackney Wick, Fish Island, Bromley-by-Bow, Sugar House Lane, Carpenters Estate and Westfield Stratford City (see Appendix 5). The LLDC MDA includes land in the boroughs of Newham, Hackney, Tower Hamlets and Waltham Forest (known collectively as the “Growth Boroughs”) and the three Mayors and the Leader of these four boroughs are members of the LLDC Board.
- 1.4. LLDC’s current responsibilities relate to the development of land in and around QEOP and the provision of a single point of contact for developers, landowners and businesses, as well as to strategic investment in the area more broadly. LLDC also has responsibilities in relation to the management of the QEOP estate, and the delivery of socioeconomic outcomes which ensure that local communities benefit from investment in the area. The LLDC has also been the Local Planning Authority for its area and, as a result of the 2012 Order, it took on certain planning functions from the Growth Boroughs.
- 1.5. Under section 215 of the Localism Act 2011, the Mayor is required “...to review, from time to time, the continuing in existence of any existing MDCs”. In early 2020, the Mayor asked the LLDC Board to bring forward recommendations in relation to the future of the LLDC. As a result of the work undertaken, in March 2022, the LLDC Board made a series of recommendations to the Mayor which were subsequently approved via MD via [MD3015](#) (see Appendix 1) in September 2022, comprising the move to a “reset LLDC” model of operation from 1 April 2025 with a reconstituted Board and governance structure, the removal of its town planning functions from 1 December 2024 and (subject to consultation) a reduced MDA from the same date. The Mayor authorised LLDC to negotiate and prepare a Statutory Transfer Scheme in relation to the transfer of LLDC’s town planning functions back to the four boroughs and to report back to the Mayor in due course. The Mayor also authorised LLDC to undertake a consultation on the proposed reduction of the LLDC MDA from 1 December 2024, and to report back to the Mayor on the consultation in due course.

Consultation for a reduced Mayoral development area from 1 December 2024

- 1.6. In March 2022, following discussions with the four boroughs and neighbouring landowners and stakeholders, the LLDC Board approved a proposal that the LLDC MDA should be reduced from 1 December 2024 to the core area where LLDC owns and/or manages or operates land, noting that this would be subject to consultation. As noted above, in September 2022 the Mayor, via MD3015,

¹ Former lead regeneration agency for east London, with the power to compulsorily buy and develop land to create new homes and jobs which was dissolved in 2013.

authorised LLDC to undertake a consultation on the Mayor's proposal for a reduction in LLDC's MDA on his behalf.

- 1.7. The rationale for the proposal of a reduced LLDC area is based on the return of LLDC's Town Planning functions to the Growth Boroughs, which removes a key rationale for the broader geographical area for which LLDC is currently responsible. It is also informed by the anticipated completion of a number of core developments in the wider LLDC area in the next few years; the increasingly effective collaborative working between LLDC and the Growth Boroughs on shared priorities; and the growing number of partners in and around QEOP with the potential to play a role in the ongoing delivery of London 2012 legacy commitments.
- 1.8. Under the Localism Act 2011, the Mayor may decide to exclude land from an MDA (which will in effect re-draw the LLDC's boundary). Before doing so, the Mayor must consult the London Assembly and any other person whom the Mayor considers it appropriate to consult on any new boundary proposals.
- 1.9. The LLDC Reduced Area Consultation document was published on the QEOP website and was open from 7 March 2023 to 9 May 2023 (the consultation document can be found [here](#)). The LLDC Chief Executive wrote to the Chair of the London Assembly, local Assembly members, the Chair of the Growth Borough Partnership and local MPs inviting them to respond. Information about the consultation was also included in the LLDC stakeholder newsletter (which reaches approximately 800 stakeholders) and shared through strategic forums such as the Park Panel.
- 1.10. The London Assembly requested an extension to the consultation period, which was granted until 30 May 2023. The LLDC's Executive Director of Regeneration and Community Partnerships briefed the London Assembly Planning and Regeneration Committee on the proposals in the consultation on 19 April 2023, and both the LLDC's Chief Executive and the Executive Director of Regeneration and Community Partnerships appeared before a special Plenary session of the Assembly on 18 May 2023 to answer questions about the proposal.

Reduced area consultation report and responses

- 1.11. A total of six responses were received to the consultation, from London Assembly Members, the four Growth Boroughs, and the chair of the Growth Borough Partnership. All six responses were supportive of the proposal. In developing the proposal for a reduced area, LLDC had previously engaged with Lee Valley Regional Park Authority; Lendlease (for International Quarter London), Delancey (for East Village) and Westfield Stratford City. These partners did not respond to the consultation.
- 1.12. Respondents were asked whether there were any areas of the proposed reduced MDA which should be omitted; none were suggested. Respondents were also asked about any additional areas within the current MDA that should be retained. The London Borough of Newham ("the LB of Newham") suggested that the Rick Roberts Way development site should be retained in the reduced MDA, because LLDC will continue to have significant land holdings and oversee development activity in this area. The LB of Newham requested reassurance that if Rick Roberts Way were to be excluded, LLDC would continue to "work in close collaboration on future plans and development for Rick Roberts Way and [to have] in-depth conversations on LLDC's future role in this area".
- 1.13. The proposal to exclude Rick Roberts Way from the reduced MDA was based on the geographical position of the site, which is separated from the core QEOP area by Stratford High Street, and the fact that the freehold on the LLDC land will be transferred on practical completion (c.2028) to a development partner selected through a competitive procurement process (approved under DD2636). It is also informed by recent Fixed Estate Charge Review, which concluded that future residents of Rick Roberts Way should not be liable to contribute to the upkeep of Queen Elizabeth Olympic Park as 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.
- 1.14. LLDC has discussed this directly with the LB of Newham and has written to confirm its continued commitment to the successful development of the site regardless of whether it is within or outside the

MDA. Rick Roberts Way forms an important part of the LLDC Housing Delivery Programme and Portfolio Approach to Affordable Housing. It also still forms part of the Legacy Communities Scheme Planning Consent, until such time as the development partner submits a revised application. More broadly, LLDC will retain an ongoing leadership and coordination role in order to deliver the long-term vision for QEOP, which means that its focus will not be limited by the physical boundary of its MDA but extend into the surrounding area to ensure that QEOP is successfully embedded in the wider area to maximise QEOP's social and economic regeneration. This will not include the discharge of any planning functions as these are being handed back to the boroughs for the whole of LLDC's MDA.

- 1.15. LLDC is also working with the London Borough of Waltham Forest to nurture a 'special relationship' with LLDC which is short of Board membership to ensure that its residents benefit from opportunities created on and around the Park, and that the continued regeneration of QEOP is a success, given that the reduced MDA will no longer include land within the borough.
- 1.16. It should be noted that there are some small areas of land outside the proposed reduced area which LLDC will continue to own or have an interest in for a period of time in support of or incidental to its objective to secure the regeneration of the area. These include Three Mills Studios which LLDC will continue to hold as an asset (this is consistent with LLDC's long-term financial plan); Hackney Wick Central, the freehold of which LLDC will retain until the development is complete at which point it will be transferred to the developer; and various other pieces of land which LLDC will either retain or is in active discussions with a view to disposal.
- 1.17. A report (included at Appendix 2) has been prepared for the Mayor summarising the responses to the consultation and recommending that he formally approves the proposed reduction of the LLDC MDA as presented in the consultation document. In July 2023 the LLDC Board received an update on the progress of work related to the transfer of planning powers and approved the submission of the report to the Mayor. A map of this reduced LLDC MDA was included at page 10 of the consultation document (see Appendix 3).

Next steps

- 1.18. If the Mayor decides to reduce the LLDC MDA, he must publicise the decision and notify the relevant Secretary of State and LLDC. The Secretary of State will then be under an obligation to amend the original order to alter the boundaries of the MDA to exclude any area of land. LLDC officers are working closely with officials from the Department for Levelling Up, Housing and Communities (DLUHC) to prepare a Statutory Instrument (SI) to substitute a new map of the reduced MDA for the existing one, as well as the SI required to effect the transfer of town planning functions. Once prepared, these SIs will be laid before Parliament via the negative resolution procedure in April 2024 to be in place on 1 December 2024. This timetable is dependent on DLUHC resources.

2. Objectives and expected outcomes.

- 2.1. The original objectives of the LLDC were to use the once-in-a-lifetime opportunity of the London 2012 Olympic and Paralympic Games and the creation of QEOP to develop a dynamic new heart for east London, creating opportunities for local people and driving innovation and growth in London and the UK. These will remain the aims of the reset LLDC.
- 2.2. The purpose of the reduced area consultation was to seek views on the proposed reduced area from 1 December 2024 over which the reset LLDC will exercise regeneration powers to deliver its aims and the 2030 vision for QEOP as: "An innovative London metropolitan centre with a global focus, powered by inclusive growth, with community and opportunity at its heart". The 2030 Vision for QEOP has three strands:
 - **Inclusive Growth:** A place in which people want to invest, enhancing local lives as well as national economic growth
 - **Community:** An attractive and inspiring place where people come together to achieve great things

- Opportunity: A place where local talent is celebrated and the benefits of regeneration can be shared by all.
- 2.3. Since fully reopening in 2014, over 37 million visits have been made to the QEOP and its venues, which have held over 100 major sporting and cultural events since 2012. To date, LLDC has supported the delivery of over 11,000 end-use jobs on the QEOP, against a target of 40,000 by the mid-2030's, alongside more than 13,000 homes across the wider MDA.

3. Equality comments

- 3.1. Under section 149 of the Equality Act 2010 (the Equality Act), as public authorities, LLDC and the GLA are subject to a public sector equality duty which means that, when carrying out their functions, they must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation and any other conduct that is prohibited by or under the 2010 Act, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not. Protected characteristics under the Equality Act include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status.
- 3.2. LLDC since its inception has worked closely with the Growth Boroughs and with local communities to ensure that QEOP is a place which is accessible and welcoming to all, regardless of disability, gender, race, ethnicity, or sexual orientation, and that a diverse range of views are factored into ongoing development and management of the Park.
- 3.3. The alteration of the boundaries of the MDA that this Mayoral Decision refers to is one part of the transition to the next phase of QEOP and a reset LLDC. This also includes changes such as the transfer of LLDC's planning functions to the Growth Boroughs from 1 December 2024, and the anticipated reduction in LLDC's staffing and financial resources from 1 April 2025. These changes will impact on persons with protected characteristics whether they live in the geographic confines of the existing MDA, the reduced MDA or indeed the surrounding area or indeed if they are visiting the area.
- 3.4. LLDC has undertaken an equality impact assessment (see Appendix 4) to document its consideration of the impacts of the transition to the next phase of QEOP and LLDC, on persons with protected characteristics under the Equality Act.
- 3.5. As set out in MD3015, from April 2025 LLDC will have a smaller remit. The anticipated reduction in the staffing and financial resources of LLDC from 1 April 2025 onwards is likely to have some impact on LLDC's ability to continue to directly deliver a range of socio-economic programmes and community engagement projects and activities which may have an adverse effect on some protected groups. LLDC is currently working with the Growth Boroughs and Park partners to shape and agree the post-2025 delivery approach in these areas, and this will be kept under review.
- 3.6. The transfer of LLDC's planning functions to the Growth Boroughs on 1 December 2024 may reduce LLDC's ability to directly influence the implementation of existing exemplary accessibility and inclusive design standards through the planning process in relation to future developments in the area surrounding QEOP. Consideration is being given as to how LLDC can support the Growth Boroughs to continue to uphold high standards of accessibility and inclusion in order to avoid any potential negative impact on persons in protected groups. The Growth Boroughs are also subject to the public sector equality duty.
- 3.7. The transition to the "reset model" of LLDC and the reduction of the MDA are being undertaken noting that the LLDC was formed with the purpose of regenerating and overseeing delivery of a meaningful physical, social, economic and community legacy from the 2012 Olympic and Paralympic Games. While there is still a significant amount of work to do, the core developments undertaken by the LLDC have been completed or are near completion, there are growing numbers of cultural, academic and community partners in the area who are committed to a continuing legacy agenda and there is increasingly effective collaboration with the Growth Boroughs.

- 3.8. Against this background, LLDC consider that the changes are justified, notwithstanding the adverse impacts identified, but will keep this under review on an ongoing basis.

4. Other considerations

Key risks, issues and mitigations

- 4.1. LLDC officers are working closely with DLUHC officials to mitigate any risk of delays to the preparation of the SI revoking planning powers and the SI to substitute a new map setting out the reduced MDA for the existing one referenced in SI No.310/2012, and the submission of these for Parliament's approval under the negative resolution procedure.

Links to Mayoral strategies and priorities

- 4.2. The ongoing regeneration of the revised MDA will help to deliver Mayoral strategies including the Mayor's Good Growth priorities, the Skills Roadmap, the Economic Development Strategy for London, London Housing Strategy, Culture Strategy, Transport Strategy, London Environment Strategy and several of the Mayor's policies in the London Plan.

Consultations and impact assessments

- 4.3. LLDC has been working closely with the four neighbouring boroughs on plans for the next phase of LLDC through the Growth Borough Partnership (membership is Borough Mayors of Hackney, Newham and Tower Hamlets and the Leader of Waltham Forest), Borough Transition Group senior officers and LLDC officers, plus a range of specialist working groups.
- 4.4. The Localism Act 2011 requires the Mayor to consult before making a decision to alter the MDA with the London Assembly and "any other person whom the Mayor considers it appropriate". The LLDC Chief Executive wrote to the Chair of the London Assembly, local Assembly members, the Chair of the Growth Borough Partnership and local MPs whose constituency contains any part of the original and revised area to invite their responses. The reduced area consultation document was available on the QEOP website and information about the consultation was also included in the LLDC stakeholder newsletter (which reaches approximately 800 stakeholders) and shared with strategic fora such as the Park Panel.
- 4.5. There are no conflicts of interest to declare from any of the officers involved in the drafting or clearance of this decision.

5. Financial comments

- 5.1. The financial implications arising from this work programme relate to:
- direct costs associated with the transition (i.e., the cost of professional advice (such as legal, HR and tax), project and staff-related costs (such as pension and redundancy costs)
 - the associated impact of the transition on LLDC's budget from 1 April 2025 onwards.
- 5.2. The GLA is aware that provisions for the direct costs have been included within LLDC's approved 2023-24 budget and its 2024-25 budget submission. Once LLDC's budget is set by its Board in March each year following the conclusion of the GLA Group budget process, LLDC is required to monitor and report on its expenditure on a quarterly basis; thereby reducing the risk of in-year overspends relating to these items.
- 5.3. The Mayor's Budget Guidance 2024-25, published in July 2023, highlights that LLDC's future funding allocations from the Mayor will reduce from 2025-26 reflecting the lower funding amounts required as LLDC will be a smaller organisation following transition; and notes that the final level of grant required for the reset LLDC will be determined during 2024-25.

6. Legal comments

- 6.1. The alteration of the boundaries of the MDA is part of the transition to the “reset model” for the LLDC.
- 6.2. The reset LLDC will remain in existence as a statutory body and MDC with the same range of functions (except its town planning functions) under the Localism Act 2011 (“the 2011 Act”) that it currently has. It will remain a functional body within the GLA Group and be subject to the normal processes and procedures that apply to a functional body, including approval of its budget and council tax requirement (if any) as part of the annual budget-setting process. The Mayor will appoint the reset Board (including giving consent to the appointment of substitute members of committees) in the normal way under the 2011 Act. The Mayor’s ability to give the LLDC guidance and directions will remain.
- 6.3. The process by which the Mayor may alter the boundaries of an MDA to exclude any area of land is set out in section 199 of the 2011 Act.
- 6.4. The Mayor is required to consult the London Assembly and any other person considered appropriate before making such an alteration – see section 199(2). Appendix 2 sets out the consultation process and the responses to the consultation. Any alteration must be publicised and notified to the Secretary of State and the LLDC under section 199(3) of the 2011 Act. The Secretary of State must then give effect to the alteration by making an order – see section 199(4). In practice, this means preparing a Statutory Instrument to substitute a new map (see Appendix 3) setting out the reduced MDA for the existing one referenced in SI No.310/2012 (see Appendix 5) and submitting this for Parliament’s approval under the negative resolution procedure.
- 6.5. LLDC can exercise its specific powers outside the reduced MDA (such as owning, having an interest in and regenerating and developing land), if they are exercised for the purpose of its object to secure the regeneration of the reduced MDA, or for purposes incidental to securing the regeneration of the reduced MDA, and the Mayor is referred to paragraphs 1.14 and 1.16 above.
- 6.6. In taking the decision requested, the Mayor must have due regard to the Public Sector Equality Duty and the Mayor is referred to section 3 above.
- 6.7. The Mayor is asked to have regard to all of the information and advice in this form and its appendices when making his decision.
- 6.8. To the extent that the decision to reduce the MDA leads to LLDC employee redundancies then the LLDC will need to ensure that it follows the appropriate processes and consults with any affected staff.

7. Planned delivery approach and next steps

Activity	Timeline
Mayoral decision to approve the reduced MDA	December 2023
Mayor to notify the relevant Secretary of State of alteration of MDA boundary	December 2023
Statutory Instrument laid before Parliament by Secretary of State	April 2024 (DLUHC to confirm)
Town planning powers return to relevant boroughs; reduced MDA effected	From 1 December 2024
Next phase of LLDC with new structure and governance in place	From 1 April 2025

Appendices and supporting papers:

Appendix 1: MD3015

Appendix 2: London Legacy Development Corporation reduced area consultation report to the Mayor of London, August 2023

Appendix 3: LLDC revised Mayoral Development Area, page 10 from the reduced area consultation document, March 2023

Appendix 4: Equalities Impact Assessment

Appendix 5: Mayoral Development Area – existing map from SI No.310/2012

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will either be published within one working day after it has been approved or on the defer date.

Part 1 – Deferral

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

Drafting officer:

Jamie Dean has drafted this report in accordance with GLA procedures and confirms the following:

✓

Sponsoring Director:

Phillip Graham has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.

✓

Mayoral Adviser:

Jules Pipe has been consulted about the proposal and agrees the recommendations.

✓

Advice:

The Finance and Legal teams have commented on this proposal.

✓

Corporate Investment Board

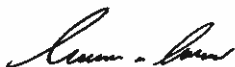
This decision was agreed by the Corporate Investment Board on 18 December 2023.

✓

INTERIM CHIEF FINANCE OFFICER:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature:



Date:

18/12/2023

CHIEF OF STAFF:

I am satisfied that this is an appropriate request to be submitted to the Mayor

Signature:



Date:

18/12/2023

