

GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION – MD3015

Title: London Legacy Development Corporation (LLDC) transition – approval of reset LLDC, ending of planning powers and Mayoral Development Area boundary consultation

Executive summary:

The London Legacy Development Corporation (LLDC) is a Mayoral Development Corporation established in 2012 by statutory instrument under the Localism Act 2011. Approval is sought for the body to move to a “reset LLDC” model from 1 April 2025, with a reconstituted Board and governance structure; and (subject to consultation) a reduced geographical development area from 1 December 2024. Approval is also sought to formally remove all the LLDC’s town-planning functions from the same date; these would then return to the four London boroughs of Newham, Hackney, Tower Hamlets and Waltham Forest. The continued purpose of the reset LLDC would be to deliver the ongoing management and regeneration of the Queen Elizabeth Olympic Park area. Approval is sought for the LLDC to consult on the Mayor’s proposal to reduce the Mayoral Development Area (MDA). It is also proposed that the LLDC begins work on preparing a statutory transfer scheme, relating to the transfer of the LLDC’s planning functions back to the four boroughs.

Decision:

That the Mayor:

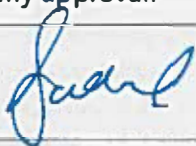
1. approves the move to a “reset LLDC” model of operation from 1 April 2025 with a reconstituted Board and governance structure, the removal of its town-planning functions from 1 December 2024 and (subject to consultation) a reduced MDA from the same date
2. decides, for the purposes of sections 204(2) and (3) of the Localism Act 2011, that from the start of 1 December 2024 the LLDC shall cease to exercise, as regards the whole of its MDA, the entirety of the town-planning functions conferred on it by SI 2012/No. 2167; and is asked to notify the Secretary of State by letter that he has made this decision
3. authorises the LLDC to undertake a consultation on the Mayor’s proposals for a reduction in the LLDC’s MDA boundary from 1 December 2024, including with those mentioned at paragraph 4.4, below, and to report back to the Mayor on the consultation in due course
4. authorises the LLDC to negotiate and prepare a statutory transfer scheme under section 216 of the 2011 Act for later submission to the Mayor in relation to the transfer to the four boroughs of planning-related matters, and to report back to the Mayor in due course.

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:

8/9/22

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

Decision required – supporting report

1. Introduction and background

- 1.1. The Localism Act 2011 provides the legislative basis for the Mayor of London to designate Mayoral Development Areas (MDAs) and to establish Mayoral Development Corporations (MDCs) with regeneration powers over the area. MDCs are created by an Order (statutory instrument) made by the Secretary of State for Levelling Up, Housing and Communities.
- 1.2. The London Legacy Development Corporation (LLDC) was formed in April 2012 as the first ever MDC established by a statutory instrument (SI 2012/No. 310). This instrument contained a map of the MDA to take forward commitments made in the original London 2012 bid in relation to the physical and socioeconomic regeneration of Queen Elizabeth Olympic Park (QEOP) and the surrounding area. It was granted town-planning powers through a further statutory instrument (SI 2012/No. 2167; see 1.16, below) from 1 October 2012.
- 1.3. On 1 April 2012, the LLDC took on all the property, rights and liabilities of the Olympic Park Legacy Company; and the property, rights and liabilities located in the LLDC area from the London Thames Gateway Development Corporation (LTGDC).
- 1.4. The MDA is QEOP and neighbouring districts including Hackney Wick, Fish Island, Bromley-by-Bow, Sugar House Lane, the Carpenters Estate and Westfield Stratford City (see the area bounded by the dotted black line on the plan at appendix 1). The LLDC's area includes land in the boroughs of Newham, Hackney, Tower Hamlets and Waltham Forest. The Mayors and Leaders of these four boroughs are members of the LLDC Board.
- 1.5. The LLDC's responsibilities include 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 for strategic investment in the area more broadly. The 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 is also the Local Planning Authority for its area; and, as a result of SI 2012/No. 2167 (see 1.16, below), took on certain planning functions of the four boroughs within it.
- 1.6. Under section 215 of the Localism Act 2011, the Mayor is required "to review, from time to time, the continuing existence of any existing MDCs". The Mayor asked the LLDC Board to bring forward recommendations in relation to the LLDC's future.
- 1.7. Therefore, the LLDC has been working with GLA, the boroughs and other stakeholders to develop a strategic approach for the future delivery of ongoing functions, and the long-term operation and oversight of QEOP. This process is referred to as transition.
- 1.8. Guiding all decision-making is an agreed set of transition principles. These are that oversight and operation of QEOP must: retain the integrity and maintain the quality of the estate; carry the flame of the regeneration vision; be democratically accountable; and, London Stadium aside, aim to become financially sustainable without ongoing GLA grant-funding.
- 1.9. There remains significant work to do to fulfil the commitments made in the original London 2012 bid with respect to the regeneration of east London. However, it is anticipated that a large part of the LLDC's direct role in this will be complete by 2025. With a robust prioritisation of its workload as set out in the QEOP Strategy to 2025, key objectives will have been delivered by 2025 and plans will be in place for the next phase of the LLDC.
- 1.10. As a result of the work undertaken, the LLDC Board is recommending the decisions set out in the "Decision" section above, and outlined below, to the Mayor of London.

Reset LLDC from 1 April 2025

- 1.11. Certain elements of the LLDC's current remit will need to continue beyond transition. These include overseeing the long-term management of the estate; realising the ongoing delivery of legacy and inclusive economy aims; coordinating future inward investment and strategic oversight for the area; and delivery of ongoing housing development responsibilities. Following consideration of options and corporate structures, in March 2022 the LLDC Board agreed that a "reset LLDC" model was the structure to be recommended to the Mayor to deliver these functions. Under this model the current LLDC legal entity, as an MDC and functional body with statutory functions under the Localism Act 2011, remains but with a reduced MDA boundary, revised functions (which include the ending of its town planning role) and governance, and with a more commercial focus, in order to reduce QEOP's call upon the public purse. It is proposed that the LLDC operates in this "reset mode" from 1 April 2025. The reset LLDC Board would consist of at least ten diverse members appointed by the Mayor including an independent chair; an elected member from each of the boroughs whose land sits within the reduced MDA (as per the Localism Act 2011); a young person; and members with significant track records in delivering inclusive growth across a range of skillsets. The Mayor will be asked to approve the necessary board appointments in due course.

Reduced Mayoral Development Area from 1 December 2024

- 1.12. Under the Localism Act 2011, the Mayor may exclude land from an approved MDA and so redraw the LLDC's boundary (additional land cannot be added). 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. A consultation document is being prepared that sets out the proposed revised boundary (bounded by the red line on the map at Appendix 1). The rationale for the current LLDC area was that it included a core area where the LLDC owns, manages or operates land; and a broader surrounding area where the LLDC has town-planning powers. Once the LLDC returns town-planning powers to the boroughs on 1 December 2024 (see section 1.16) there will no longer be any rationale for this surrounding area to remain within the LLDC area. The proposed reduced LLDC area therefore corresponds to the core area where the LLDC owns, manages or operates land.
- 1.13. The existing LLDC area includes Eton Manor, which lies within the London Borough of Waltham Forest (LBWF). The LLDC does not own, manage or operate any land at Eton Manor; and so, once the LLDC no longer has town-planning powers, there will no longer be any rationale for it remaining within the reduced LLDC area. The LLDC Board (including the LBWF) is content with the removal of Eton Manor from the LLDC area. The new LLDC boundary will therefore not include any land that lies within the LBWF; and as a result, the LBWF will no longer be entitled to a seat on the LLDC Board. The Mayor of London has agreed with the Leader of the LBWF (and the Mayors of the other growth boroughs) that a 'special relationship' will be developed between the LLDC and the LBWF to ensure that LBWF residents continue to enjoy the socioeconomic benefits of the developments at QEOP.
- 1.14. It is proposed that the consultation will be carried out by the LLDC on the Mayor's behalf in Autumn 2022. The proposed new boundary (if approved) will come into effect on 1 December 2024 (the same date as the return of full town-planning powers to the four boroughs).
- 1.15. The outcome of the consultation will be reported to the Mayor in due course; he will be asked to decide whether to formally approve the new reduced MDA, and, if so, to write to the Secretary of State and publicise that decision. The Secretary of State is then under an obligation to make a statutory instrument to substitute a new map in SI No.310/2012, showing the reduced MDA, and to submit it for Parliament's approval under the negative resolution procedure.

Revocation of planning functions from 1 December 2024

- 1.16. The London Legacy Development Corporation (Planning Functions) Order 2012 (SI. 2012 No. 2167) came into force on 1 October 2012 and conferred a set of town-planning functions on the LLDC.

This gave effect to a decision by the then Mayor that the LLDC was to exercise those functions in respect of the whole of its MDA. These functions are as follows:

- The 2012 Order made the LLDC the local planning authority for the whole of its MDA (the planning functions area) in relation to all types of development for the purposes of part 3 of the Town and Country Planning Act 1990 (the 1990 Act) (article 3).
- It conferred on the LLDC the functions of the 1990 Act and the Planning (Listed Buildings and Conservation Areas) Act 1990, which are specified in part 1 of schedule 29 to the Local Government, Planning and Land Act 1980 (the 1980 Act) (article 4).
- It also conferred on the LLDC the functions of schedule 8 to the Electricity Act 1989 so far as they are applicable to applications for consent under section 37 of that Act (article 5).
- The 2012 Order applied other provisions of the 1990 Act specified in part 2 of schedule 29 to the 1980 Act to the LLDC; and to the planning functions area, subject to the modifications set out in that part (article 7).
- The 2012 Order also revoked the planning functions order under which the LTGDC and the Olympic Delivery Authority (ODA) (since abolished) exercised planning functions as local planning authorities, in relation to the types of development and for the purposes specified in those Orders, for their areas. The effect of the 2012 Order was that they ceased to be the local planning authorities, and those functions became exercisable instead by the LLDC in relation to the planning functions area. Outside that area the planning functions of the LTGDC and the ODA reverted back to the relevant borough councils.
- The Order also contained transitional provisions in relation to matters being carried out at the time it came into force.

- 1.17. In February 2020, the LLDC's Board approved a high-level strategic approach for the evolution of the organisation in 2025, including the handing-back of town-planning powers to the four boroughs before the end of December 2024. The formal extinguishment of the LLDC's planning role requires the Secretary of State to make a statutory instrument to revoke the 2012 Order – at which point the four boroughs will resume their normal planning functions within their respective areas.
- 1.18. The Mayor has already written to the Secretary of State to give advance notice of this proposal. This Mayoral Decision form invites the Mayor to decide that, from the start of 1 December 2024, the LLDC's current town-planning functions (conferred on it by the 2012 Order and listed in paragraph 1.16, above) shall be revoked as regards the whole of the LLDC's MDA. (At this point the four boroughs will resume their role as local planning authority for those parts of the MDA that are within their respective boroughs.) The Mayor is requested to write to the Secretary of State to inform him of this decision, which will be publicised on the LLDC's website. Again, the Secretary of State is then obliged to bring forward a statutory instrument for Parliament's approval.
- 1.19. With the Mayor's approval (via this Mayoral Decision), it is proposed that the LLDC will start work on preparing a statutory transfer scheme, under section 216 of the Localism Act 2011, covering the transfer of planning-related matters to the four boroughs. These matters include, for example, records, live planning applications, live planning enforcement cases and appeals, and staff (if applicable). The boroughs must consent to any transfer to them. The Mayor will be asked to approve the statutory transfer scheme in due course.

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 Games, and the creation of QEOP, to develop a dynamic new heart for east London – thus

creating opportunities for local people, and driving innovation and growth in London and the UK. These remain the aims of the reset LLDC.

2.2. The purpose of the boundary consultation is to seek views on the proposed reduced boundary from 1 December 2024, over which the reset LLDC will exercise regeneration powers to deliver its aims and the 2030 Vision for QEOP, which is: "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. The 2030 Vision for QEOP, and these three strands, are shown in the diagram below.



2.4. Since fully reopening in 2014, over 37m visits have been made to QEOP and its venues, which have held over 100 major sporting and cultural events since 2012. To date, the LLDC has supported the delivery of over 25,000 jobs at QEOP, alongside more than 11,500 homes across the wider MDC area.

3. Equality comments

3.1. Under section 149 of the Equality Act 2010 (the Equality Act), as a public authority, the LLDC and the GLA must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; 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 comprise age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status.

3.2. The proposed move to a reset LLDC model, a reduced MDA boundary and the ending of the LLDC's planning functions are not expected to have any negative impact on those with protected characteristics.

4. Other considerations

Key risks and issues

- 4.1. There is a risk of negative feedback on the proposed reduced MDA boundary. This risk is being mitigated by engagement with key stakeholders including the LLDC Board; four neighbouring boroughs; developers and landowners; and QEOP partners, all of whom are positive about the proposals.

Links to mayoral strategies and priorities

- 4.2. The ongoing regeneration of the revised LLDC area will deliver across Mayoral strategies and priorities including the Mayor's Good Growth priorities, Skills for Londoners, the Economic Development Strategy for London, the London Housing Strategy, the Culture Strategy, the Transport Strategy, the London Environment Strategy, and a number of the Mayor's policies in the London Plan.

Consultations and impact assessments

- 4.3. The LLDC has been working closely with the four boroughs within its current boundaries on transition plans through the Growth Borough Partnership (membership is borough Mayors and Leaders) and the Borough Transition Group, plus a range of specialist working groups.
- 4.4. The Localism Act requires the Mayor to consult on revising the MDA boundary with the London Assembly and "any other person whom the Mayor considers it appropriate to consult". It is proposed the latter category could include signposting the document on the QEOP website to the following persons: members of Parliament whose constituency contains any part of the original or revised area; each constituency member of the London Assembly whose Assembly constituency contains any part of the original or revised area; the neighbouring boroughs; stakeholders; and members of the public. It is proposed that the LLDC undertakes the consultation on the Mayor's behalf, and submits a report to the Mayor in due course on the consultation responses for him to decide whether or not to approve the new proposed boundary.
- 4.5. Consultations would take place with any relevant LLDC staff who might transfer to the boroughs under the transfer scheme in accordance with the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE).

5. Financial comments

- 5.1. A key objective in establishing a reset MDC is that it should become financially sustainable over time so that it can operate without any revenue grant-funding from the GLA, except for the ongoing subsidy required for the operation of the London Stadium. The level of income that can be generated from activities will largely determine delivery of this objective – the most significant element of which is the Fixed Estate Charge (FEC), as income from the FEC is projected to increase over time in line with the increase in the number of commercial and residential occupiers. The Mayor has committed to undertake a review of the FEC.
- 5.2. An estimate of the grant-funding that LLDC may require in 2025-26, the first full financial year of operations of a reset LLDC, will be assessed as part of the 2023-24 formal budget-setting process.

6. Legal comments

- 6.1. This section covers legal issues not otherwise addressed in this Mayoral Decision. The procedure for reducing the size of the MDA and removing its planning functions has been set out above.
- 6.2. The reset LLDC will remain in existence as a statutory body and MDC with the same range of 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 Mayor has the power, under section 204(2)(a) of the 2011 Act (removal or restriction of planning functions), to decide that the LLDC is to cease to have, in its entirety (as respects the whole of its MDA), the town-planning functions conferred on it by the previous Mayor's decisions under section 202(2), (3) or (4) of the 2011 Act, as implemented by the 2012/No. 2167 Order. If the Mayor makes such a decision he must: publicise the decision; and notify the Secretary of State of the decision. Under section 204 subsection (6) of the 2011 Act, the Secretary of State must give effect to that notified decision and bring forward an amending Order to implement the new decision under the negative resolution procedure, which will formally revoke the 2012 Order with transitional provisions.
- 6.4. The decision the Mayor is asked to take in recommendation 2 in the Decision box, above, is a decision that from 1 December 2024, the LLDC shall cease to exercise all the town-planning functions conferred on it under the 2012 Order as regards the whole of the MDA. The Mayor is not required by section 204 of the 2011 Act to undertake any consultation before making this decision.
- 6.5. The LLDC will need to assess the staffing implications of moving to the reset LLDC model. If the LLDC proposes any staff redundancies in relation to this, it will need to consult with staff and/or their representatives as appropriate about those proposals prior to taking any final decisions in relation to such redundancies, in accordance with statutory requirements and its own organisational change policy.
- 6.6. In addition, an assessment will need to be undertaken as to whether or not TUPE applies to the transfer of planning powers back to the boroughs; and, if they do not, whether any transfer should proceed as if they did (per statutory guidance) or exceptional circumstances exist. If the statutory transfer scheme makes provision for staff to transfer to the boroughs, then under section 218 (4) that transfer is to be treated on the basis that TUPE applies.

7. Planned delivery approach and next steps

Activity	Timeline
Publicise date of planning powers transfer	Autumn 2022
Commence public consultation on reduced boundary	Autumn 2022
Prepare and issue Mayoral reduced boundary consultation response report	December 2022
Mayoral Decision to approve the reduced boundary	February 2023
Mayor to notify Secretary of State of alteration of MDA boundary	March 2023
Statutory instrument laid before Parliament by Secretary of State	2023 (DLUHC to confirm)
Mayoral Decision to approve statutory transfer scheme	2024 (date TBC)
Town-planning powers return to relevant boroughs; MDA boundary changes	From 1 December 2024
Reset LLDC in place	From 1 April 2025

Appendices and supporting papers:

Appendix 1 – Current LLDC MDA and proposed reset LLDC boundary

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 the 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:

Philip 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 5 September 2022.

✓

EXECUTIVE DIRECTOR, RESOURCES: Enver Enver on behalf of David Gallie

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

Signature:



Date:

5/9/22

CHIEF OF STAFF:

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

Signature:

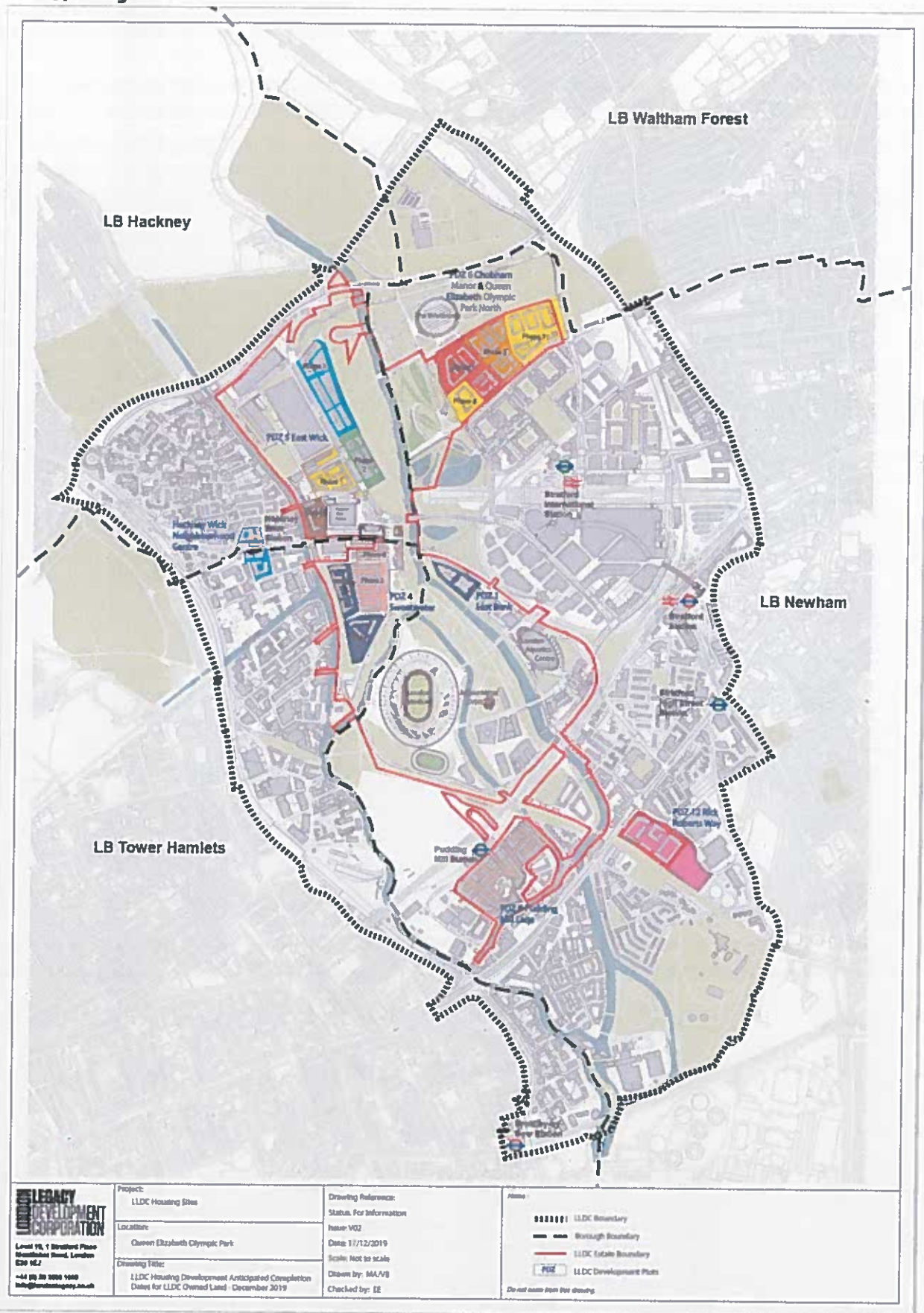


Date:

4/9/22

Appendix 1

Current LLDC MDA (black dotted line) and proposed reset LLDC boundary (red line), subject to consultation*



* The final version of the proposed boundary will be included in the consultation document; this may include minor amendments from the above map.

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 by 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.

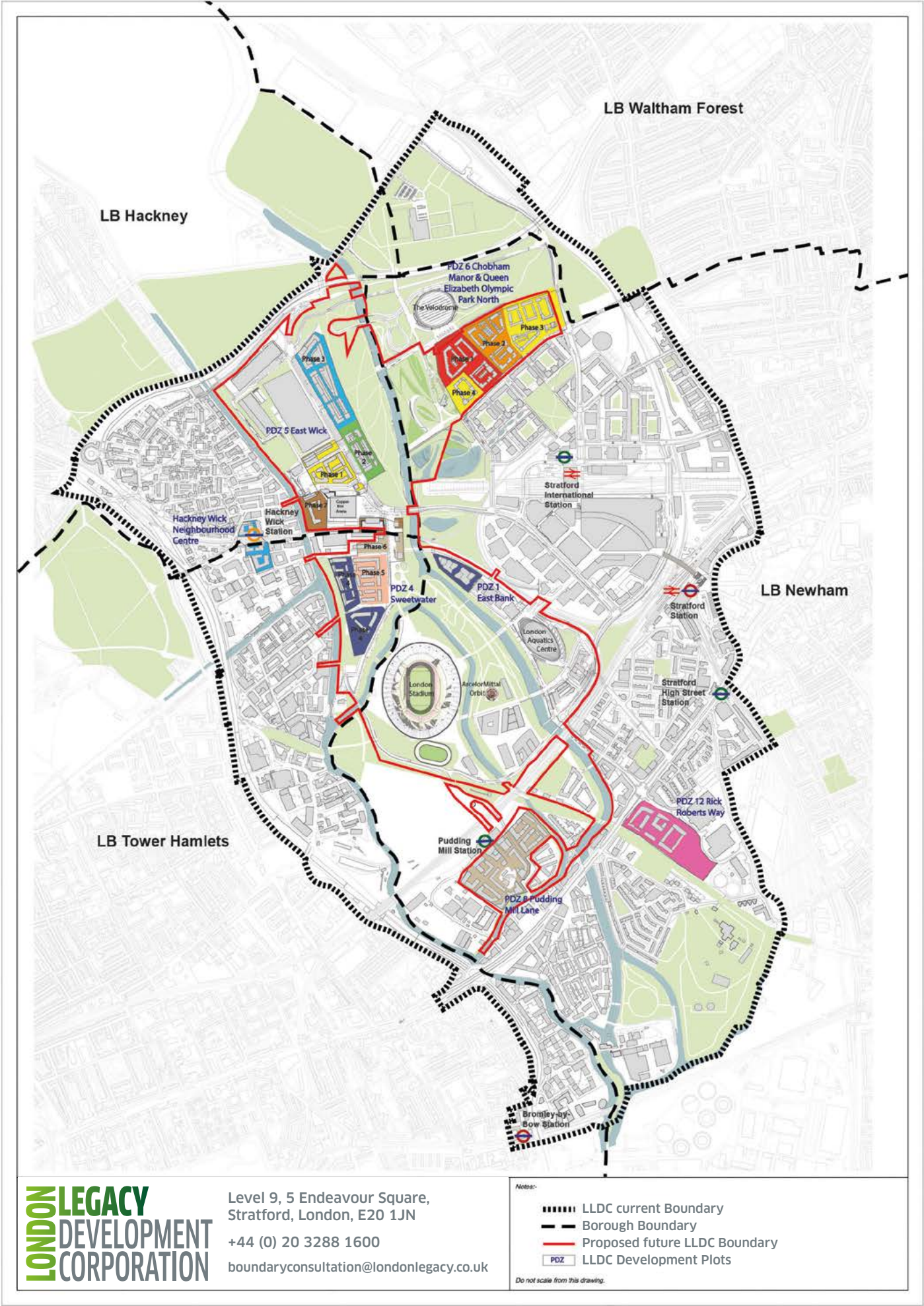
5. NEXT STEPS

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.





EQUALITY IMPACT ASSESSMENT

Purpose of an Equality Impact Assessment	<p>Public authorities are subject to a public sector equality duty under section 149 of the Equality Act 2010. To comply with the duty public authorities must have 'due regard' to the need to eliminate unlawful discrimination, advance equal opportunities and promote good relations between people when carrying out their functions. An equality impact assessment (EIA) is a tool to help evidence that this has been done, assessing the likely significant effects and impacts of the proposal and the design of any measures necessary to mitigate potential adverse impacts. It is a document which is kept under review on an on-going basis, along with any appropriate mitigations, if the proposal is confirmed.</p>
Name of policy, practice or procedure	<p>The transition to the next phase of Queen Elizabeth Olympic Park (QEOP) and London Legacy Development Corporation (LLDC), including the return of LLDC's Town Planning functions to the relevant London Boroughs (Hackney, Newham, Tower Hamlets, Waltham Forest, collectively known as the 'Growth Boroughs'), the proposed reduction of the LLDC Mayoral development area, and the anticipated reduction in LLDC's staffing and financial resources after 1 April 2025.</p>
Background	<ul style="list-style-type: none"> • When London was awarded the 2012 Olympic and Paralympic Games in July 2005, it was on the basis not only of a vision of a spectacular summer of sport, but also – more importantly - an inspirational transformation programme: 'the regeneration of an entire community for the direct benefit of everyone who lives there'. • A core part of the vision was to inspire young people and to deliver a stronger future for them. The host Boroughs contained some of London's most deprived neighbourhoods and communities. The financial and emotional investment from the London 2012 Games gave a huge boost to long held and ambitious plans to transform the post-industrial landscape, and to create stronger economic conditions and better life chances for its residents. • This ambition has been at the heart of LLDC's mission since its establishment in 2012: <i>To use the opportunity of the London 2012 Games and the creation of Queen Elizabeth Olympic Park to change the lives of people in east London and drive growth and investment in London and the UK, by developing an inspiring and innovative place where people want - and can afford - to live, work and visit.</i> • LLDC's corporate priorities and objectives are set out in the QEOP Strategy to 2025 and performance against these is outlined in regular corporate performance reporting available on the Queen Elizabeth Olympic Park website. • LLDC's work is underpinned by four priority themes which emphasise the organisation's commitment to equalities:

EQUALITY IMPACT ASSESSMENT

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| | <ul style="list-style-type: none"> ○ Delivering inclusive growth and community well-being ○ Delivering sustainable development and responding to the climate emergency ○ Delivering high quality design ○ Delivering inclusion and diversity ● Under section 215 of the Localism Act 2011, the Mayor of London is required “to review, from time to time, the continuing in existence of any existing Mayoral Development Corporations (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 for the removal of LLDC’s Town Planning functions from 1 December 2024; and for LLDC to maintain its status as an MDC beyond 1 April 2025 with a reduced remit, a reconstituted Board and governance structure and (subject to consultation) a reduced Mayoral development area. ● The proposal in relation to the LLDC Mayoral development area is that this should be reduced to include the core part of the Queen Elizabeth Olympic Park estate in which LLDC owns, manages or operates land. The anticipated removal of LLDC’s Town Planning functions, means that there will no longer be a strong rationale to retain the existing broader Mayoral development area beyond this date. This proposal was consulted upon, under the requirements of the Localism Act 2011, between March and May 2023. ● The Mayor of London has been clear that LLDC should move towards financial sustainability over the long term, excluding the London Stadium. LLDC is currently heavily reliant on funding from the GLA to support delivery of its objectives: the GLA revenue subsidy is currently £24.4m excluding the London Stadium. LLDC will seek to reduce this subsidy by driving down costs and maximising the commercial value of the Park and its assets, while maintaining delivery of social value and community benefits. ● As a result of these changes there will be a significant reduction the staffing and financial resources available to LLDC as part of this next phase of Queen Elizabeth Olympic Park. One of the consequences of this is that LLDC will no longer be resourced to directly deliver programmes, engagement and outreach activity in the way it has to date. ● LLDC has prepared for this over the past few years by working closely with partners – for example the Growth Boroughs, and partners involved in East Bank, the Good Growth Hub, and SHIFT – to explore how they can step up and lead in these areas after April 2025, with a smaller LLDC focusing on strategic oversight and coordination. A range of alternative funding sources and arrangements are also being |
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EQUALITY IMPACT ASSESSMENT

	<p>explored. These discussions are ongoing.</p> <ul style="list-style-type: none"> • The LLDC Board will be reconstituted from April 2025 to include at least ten diverse members appointed by the Mayor of London including an independent Chair; an elected member from each of the Boroughs whose land sits within the reduced Mayoral development area; a young person; and members with significant track records in delivering inclusive growth across a range of skillsets. In addition, an Inclusive Economy Committee will be chaired by one of the elected Borough members on the Board to oversee and scrutinise the impact of specific activity in this area (in addition to Investment and Audit Committees). This governance will ensure a strong and continued focus on equality and delivering with and for local communities. • The purpose of this EIA is to review the potential impact of these changes on those with protected characteristics external to LLDC (local communities, residents, businesses, visitors etc). As discussions are still ongoing with respect to future arrangements for some elements of LLDC's current remit, this EIA will be kept under review and updated as necessary.
Scope	This EIA assesses the equality impacts of the transition to the next phase of QEOP and LLDC on protected groups. A separate EIA is being developed in relation to organisational changes within LLDC.
Who is affected by the proposed changes?	Local communities, residents, businesses and visitors within both the current and the proposed reduced Mayoral development area – as well as in the surrounding area - could be affected by these proposed changes.
Who has been consulted on these proposed changes?	<p>All proposed changes in the scope of this EIA have been developed in close collaboration with the Growth Boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest. They have been approved by the LLDC Board, which includes representation from the Mayors and Leaders of the London Boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest, as well as independent members with a wide range of expertise in urban regeneration and associated fields.</p> <p>Proposal to reduce the LLDC Mayoral development area</p> <p>In addition to the above, the proposal to reduce the LLDC Mayoral development area has been informed by discussions with Elevate (formerly Legacy Youth Voice), which is made up young people from the Growth Boroughs, representing diversity in age, as well as ethnicity, gender and lived experiences; strategic fora such as the Park Panel which includes representation from local community and resident groups; and residents forums such as Your Neighbourhood Talks.</p>

EQUALITY IMPACT ASSESSMENT

	<p>Under section 199 of the Localism Act 2011, the Mayor of London “<i>may alter the boundaries of a Mayoral development area so as to exclude any area of land</i>”, but before doing so must consult the London Assembly and any other person whom he considers appropriate. The proposal for consulting with different groups was set out in MD3015.</p> <p>Between 7 March and 9 May 2023 LLDC conducted a consultation on behalf of the Mayor of London on the proposal to reduce the LLDC Mayoral development area. The consultation was published on the QEOP website. 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 to invite their responses. 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 which includes representation from local community and resident groups. The Growth Boroughs additionally took steps to draw the consultation to the attention of their residents.</p> <p>Consultation responses</p> <p>A total of six responses were received to the consultation, from the London Assembly, the four individual Growth Boroughs, and the Chair of the Growth Borough Partnership. All six were supportive of the overall proposal.</p> <p>At a special Plenary session of the London Assembly on 18 May 2023, Assembly members raised questions and broader recommendations about the future of LLDC’s activities, including community engagement. These are being addressed in a separate response to the Assembly, which is appended to this EIA, and where applicable later in this assessment.</p>
Supporting data	<p>Maps showing current and proposed new LLDC Mayoral development area.</p> <p>QEOP Visitor Survey 2021-2022 (completed Sept 2022)</p> <p>LLDC Inclusive Design Standards May 2019</p>
Owner (Directorate/Unit)	Paul Brickell, Executive Director of Regeneration and Community Partnerships, LLDC
Assessment conducted by (name)	Clare Beamish, Head of Strategy and Transition, LLDC
Contact email/telephone no.	clarebeamish@londonlegacy.co.uk

EQUALITY IMPACT ASSESSMENT

Date of assessment	September 2023
Review date	This EIA will be regularly reviewed as plans for the post-2025 oversight and operation of Queen Elizabeth Olympic Park continue to crystallise and, where appropriate, will inform decision-making about future LLDC priorities. At a minimum it will be updated alongside the development of the initial draft organisational change proposal for the future LLDC, which will be subject to formal consultation from April 2024, and prior to the transfer of town planning powers and the reduction of the LLDC Mayoral development area in December 2024. It will also be monitored in the first year of change through the Inclusive Economy Committee.

EQUALITY IMPACT ASSESSMENT

Analysis of the potential impact of the proposed change on individuals from protected groups and action proposed

AGE

Impacted by this change Y/N	Y
Background information	
<p>ONS data shows that nearly two thirds of the local population¹ is under 34.</p> <p>The age of visitors to QEOP has remained fairly consistent since 2018, with latest figures showing 12% of visitors in the 18-24 age bracket; 30% in the 25-34 age bracket; 33% in the 35-44 age bracket; 14% in the 45-54 age bracket; 5% in 55-64; and 5% over 65. LLDC does not collect data on the age of residents in QEOP neighbourhoods.</p> <p>LLDC currently directly delivers youth engagement activity to ensure that the Park is accessible to young people, that they have an opportunity to shape its future development, and that they are aware of and able to access the opportunities created by regeneration of the area. This includes programmes such as Elevate (formerly Legacy Youth Voice); and events such as East Summer School which offer unique opportunities to local young people to develop new skills and engage with the range of institutions located on the Park. LLDC also engages with local schools to ensure pupils are aware of and able to access events, facilities and opportunities on the Park.</p>	
Potential negative impact	
<p>The anticipated reduction in LLDC's staffing and financial resources after April 2025 may reduce its capacity to directly deliver some of the youth programmes and activities outlined above.</p>	
Potential mitigations	
<p>QEOP will continue to be a place which welcomes residents, workers, students and visitors of all ages regardless of the proposed changes. The Park has been designed to offer something for everyone, and this will continue to be the case eg play areas for children; 'outdoor classroom' for local schools; leisure facilities and parklands to be enjoyed by all ages.</p> <p>LLDC is working with the Growth Boroughs, East Bank partners, and other Park partners to agree the future approach to youth engagement from April 2025 onwards.</p> <p>LLDC's Park Champions programme gives people of all ages the opportunity to volunteer on the Park; this will continue beyond 2025.</p>	

¹ 'Local population' in this report refers to the population of the four Growth Boroughs: London Boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest.

EQUALITY IMPACT ASSESSMENT

LLDC's Neighbourhood Priorities Fund ² has supported community groups of all ages – remaining funds will be transferred proportionally to the Growth Boroughs to administer after town planning functions transfer.		
Action	Person responsible and timeline	Progress update
Agree future approach to youth engagement with the Growth Boroughs, East Bank partners, and other Park partners.	LLDC Executive Director of Regeneration and Community Partnerships – by 1 December 2024	

DISABILITY

Impacted by this change Y/N	Y
Background information	
<p>ONS data shows that approximately 13% of the local population is disabled under the Equality Act. In terms of visitors to the Park, latest figures show that 2.6% of visitors are limited in their day to day activities a little or a lot because of a health problem or disability.</p> <p>Following the London 2012 Games, LLDC invested £10m in delivering a Paralympic legacy programme that delivered a broad range of projects creating opportunities for disabled people while recognising and celebrating the impact of disability sport, arts and culture. A key strand of this has been to ensure that all developments in and around Queen Elizabeth Olympic Park are delivered to exemplary standards of inclusive design, to ensure delivery of inclusive places and neighbourhoods that can be used easily and enjoyed by everyone, equally. These standards go beyond Building Regulations and minimum compliance and seek best practice solutions that raise the bar for inclusion and accessibility.</p> <p>The Built Environment Access Panel (BEAP), which consists of technical experts, residents and community members with lived experience and knowledge of inclusion and disability in the built environment, reviews all development work on the Park as well as significant third-party schemes.</p>	

² The LLDC collects the Community Infrastructure Levy (CIL), a standardised charge on development, and ring-fences 15% of receipts to be spent in consultation with local communities. The LLDC manages this sum through the Neighbourhood Priorities Fund (NPF) which enables local communities to bid for funding for projects that will address the demands that development places on the LLDC area.

EQUALITY IMPACT ASSESSMENT

Potential negative impact

The return of LLDC's town planning functions to the Growth Boroughs on 1 December 2024 is likely to reduce LLDC's direct influence in relation to the standard of inclusive design delivered across future developments in the area surrounding QEOP.

The anticipated reduction in LLDC's staffing and financial resources after April 2025 may have an impact on LLDC's capacity to continue to support the work of the Built Environment Access Panel (BEAP).

Potential mitigations

LLDC will continue to be responsible for delivering remaining QEOP developments to exemplary standards of inclusive design that are recognised by the industry to create equal access for all users of the Park. In relation to future developments in the area surrounding QEOP, LLDC will work with the Growth Boroughs to emphasise the importance of these standards and to encourage them to prioritise this in their decision making as planning authorities.

Future arrangements for BEAP are currently under discussion.

LLDC will continue to champion the work of the Global Disability Innovation Hub which was initiated at LLDC and is now based at UCL East's campus on the Park.

Action	Person responsible and timeline	Progress update
<ul style="list-style-type: none"> Ensure Borough planning teams are fully briefed on LLDC inclusive design standards in advance of the transfer of town planning functions, and encouraged to prioritise inclusive design in their future decision making as planning authorities. Agree future of the Built Environment Access Panel. 	LLDC Director of Design – by 1 December 2024	

GENDER REASSIGNMENT

Impacted by this change Y/N N

LLDC does not collect data on gender reassignment in relation to visitors, residents, businesses and communities in and around Queen Elizabeth Olympic Park.

EQUALITY IMPACT ASSESSMENT

Potential negative impact		
None identified.		
Potential mitigations		
None identified.		
Action	Person responsible and timeline	Progress update
N/A		

MARRIAGE AND CIVIL PARTNERSHIP

Impacted by this change Y/N	N	
LLDC does not collect data on marriage and civil partnerships in relation to visitors, residents, businesses and communities in and around Queen Elizabeth Olympic Park.		
Potential negative impact		
None identified.		
Potential mitigations		
None identified.		
Action	Person responsible and timeline	Progress update
N/A		

PREGNANCY AND MATERNITY

Impacted by this change Y/N	N	
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EQUALITY IMPACT ASSESSMENT

LLDC does not collect data on pregnancy and maternity in relation to visitors, residents, businesses and communities in and around Queen Elizabeth Olympic Park		
Potential negative impact		
None identified.		
Potential mitigations		
None identified.		
Action	Person responsible and timeline	Progress update
N/A		

RACE

Impacted by this change Y/N	Y
Background information	
<p>In 2021/22 40% of visitors to Queen Elizabeth Olympic Park were from Black, Asian and Minority Ethnic (BAME) groups. This proportion has increased year on year from 27% in 2018/19. The proportion of BAME visitors from the four local boroughs is also increasing, from 31% in 2018/19 to 45% in 2021/22. This compares to a local population of which 52% are from a BAME background. This increase is a result of proactive efforts to raise awareness of what the Park has to offer; a broad programme of events on the Park; and effective and targeted marketing activity.</p> <p><u>In relation to the proposal to reduce the LLDC Mayoral development area</u>, a specific issue was raised by the London Assembly in the consultation process in relation to planning for Gypsy, Roma and Traveller need. LLDC has addressed this through policy and a site allocation within its adopted Local Plan and has also allocated S106 funding towards future delivery. This responsibility relates to the LLDC's function as Local Planning Authority; the four local Boroughs will take on this responsibility from the point at which town planning functions are transferred on 1 December 2024.</p> <p>Until that point, LLDC will continue to provide support through its responsibilities as Local Planning Authority and hold the currently allocated funding to support delivery of Gypsy, Roma and Traveller sites as set out in the Local Plan. For example, £2 million in S106 funding has been allocated to London Borough of Hackney to support the delivery of approximately nine pitches at Bartrip Sreet South in Hackney Wick. The funding allocation</p>	

EQUALITY IMPACT ASSESSMENT

period for this has been extended while LB Hackney continues to undertake detailed investigations into the site. This will need to be claimed by LB Hackney before the transfer of planning powers as the current allocation of the money has an end date of 30 November 2024.

Potential negative impact

The anticipated reduction in LLDC's staffing and financial resources after April 2025 may reduce its capacity to directly deliver community engagement activities and events, as well as targeted marketing activity, to increase the appeal of QEOP to BAME communities. Over time this may reduce engagement with Queen Elizabeth Olympic Park among BAME communities.

Potential mitigations

Queen Elizabeth Olympic Park will remain a place which welcomes residents, workers, students and visitors of all races regardless of the proposed changes. Between now and April 2025 LLDC will continue to focus on increasing the proportion of visitors to the Park from BAME communities in order to better reflect the local population, and will continue to actively support local community groups and networks of all races and ethnicities.

LLDC will work with the Growth Boroughs, East Bank partners, and other Park partners to agree the future approach to community engagement and events beyond April 2025 which ensures that people of all races and ethnicities can continue to access Queen Elizabeth Olympic Park, shape the ongoing development and activation of the Park, and access the opportunities created by regeneration of the area.

Action	Person responsible and timeline	Progress update
<ol style="list-style-type: none"> Where future resources allow, ensure that targeted marketing activity of Queen Elizabeth Olympic Park can continue beyond 2025 in order to maintain its appeal among communities of all races and ethnicities. Work with the Growth Boroughs, East Bank partners, and other Park partners to agree the future approach to community engagement and events. 	<ol style="list-style-type: none"> LLDC Director of Communication, Marketing and Strategy LLDC Executive Director of Regeneration and Community Partnerships <p>By 1 December 2024</p>	

RELIGION OR BELIEF

Impacted by this change Y/N Y

ONS data shows that the largest religion represented in the local population is Christianity (31.8%), followed by Muslim (24.1%), Hindu (2.7%) and Judaism (1.9%).

EQUALITY IMPACT ASSESSMENT

Potential negative impact		
The anticipated reduction in LLDC's staffing and financial resources after April 2025 may reduce its capacity to directly deliver community engagement activities and events to ensure that a range of views, opinions and religious beliefs and practices are taken into account in shaping the ongoing development and activation of the Park.		
Potential mitigations		
Queen Elizabeth Olympic Park will remain a place which welcomes residents, workers, students and visitors of all religions and beliefs, regardless of the proposed changes.		
LLDC will work with the Growth Boroughs, East Bank partners, and other Park partners to agree the future approach to community engagement and events beyond April 2025 which ensures that people of all religions and beliefs can continue to access Queen Elizabeth Olympic Park, shape the ongoing development and activation of the Park, and access the opportunities created by regeneration of the area.		
LLDC will continue to consider all faiths in the design of and events at the Park. This includes a multifaith prayer room available at Timber Lodge, and kiosks as well as events catering to religious dietary requirement eg London Halal Festival.		
Action	Person responsible and timeline	Progress update
Work with the Growth Boroughs, East Bank partners, and other Park partners to agree the future approach to community engagement and events.	LLDC Executive Director of Regeneration and Community Partnerships – by 1 December 2024	

SEX

Impacted by this change Y/N	Y
Background information	
ONS data shows that just over half the local population (50.7%) is female. Latest data shows that approximately 58% of visitors to Queen Elizabeth Olympic Park are male, compared to 42% female.	
In 2022 LLDC worked with Arup on a specific project in relation to the safety of women and girls which was commended at the annual Planning Awards. This produced a series of recommendations for improving safety in and around Queen Elizabeth Olympic Park which LLDC is in the	

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process of implementing in conjunction with stakeholders. One of the commitments from the project was to prepare [Urban Design Guidance: Creating places that work for women and girls](#) to give context and practical guidance on how development schemes and urban interventions can achieve a gender inclusive urban environment through design and management.

Analysis of potential negative impact

There is unlikely to be any negative impact – LLDC will continue to prioritise oversight of the ongoing implementation of the [Safety of Women and Girls report](#) recommendation within post-2025 staffing and financial resources.

Potential mitigations

Queen Elizabeth Olympic Park will remain a place which welcomes residents, workers, students and visitors of all genders, regardless of the proposed changes.

Action	Person responsible and timeline	Progress update
Prioritise resources within LLDC to ensure the ongoing implementation of the Safety of Women and Girls report recommendations.	LLDC Executive Director of Park, Operations and Venues – by 1 December 2024	

SEXUAL ORIENTATION

Impacted by this change Y/N N

LLDC does not collect data on sexual orientation in relation to visitors, residents, businesses and communities in and around Queen Elizabeth Olympic Park.

Potential negative impact

None identified.

Potential mitigations

None identified.

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Action	Person responsible and timeline	
N/A		

PEOPLE ON LOW INCOMES

Impacted by this change Y/N	Y	
Background information		
<p>A key element of the original bid for the London 2012 Games was an ambition to maximise the regeneration benefits of for the host boroughs in order to achieve socio-economic convergence with the London average by 2030. Progress was tracked over a number of years following the Games against a range of indicators of deprivation, with some notable successes in population, business and employment growth, educational attainment, unemployment and economic activity. More information on this can be found here.</p> <p>LLDC has continued to work closely with the Growth Boroughs to deliver shared priorities of inclusive growth and provide sustainable socio-economic initiatives to support local residents on low incomes. A range of programmes, including the Good Growth Hub and Build East, have been driven by a dedicated Regeneration and Communities directorate at LLDC.</p>		
Potential negative impact		
<p>The anticipated reduction in LLDC’s staffing and financial resources after April 2025 will reduce its capacity to directly deliver socio-economic initiatives and programmes to support people on low incomes in and around the Park.</p>		
Potential mitigations		
<p>Inclusive Economy will remain a key priority of the future LLDC overseen by a new Inclusive Economy Committee, to be chaired by an elected Borough member of the LLDC Board. LLDC is currently working with the Growth Boroughs and other Park partners to shape future Inclusive Economy activity and secure external funding for this.</p>		
Action	Person responsible and timeline	Progress update
Work with the Growth Boroughs, East Bank partners, and other Park partners to agree the future approach to Inclusive Economy and secure ongoing funding to deliver this.	LLDC Executive Director of Regeneration and Community Partnerships – by 1 December 2024	

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Conclusion
<p>The transition to the next phase of LLDC including the transfer of LLDC’s planning functions to the Growth Boroughs, the reduction in the LLDC Mayoral development area and the associated reductions in terms of its staffing and financial resources may adversely impact persons with protected characteristics whether they live in the geographic confines of the existing area, the reduced area or indeed the surrounding area or if they are visiting the area.</p> <p>LLDC currently ensures that all developments in and around Queen Elizabeth Olympic Park are delivered to exemplary standards of inclusive design, to ensure the creation of inclusive places and neighbourhoods that can be used easily and enjoyed by everyone, equally. The transfer of LLDC’s planning functions to the Growth Boroughs on 1 December 2024 will reduce LLDC’s ability to directly influence the implementation of these standards through the planning process in relation to future developments in the area surrounding QEOP.</p> <p>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. It will be important to agree the future approach to the Built Environment Access Panel, to ensure that those with lived experience and knowledge of inclusion and disability in the built environment can continue to review future development work in and around the Park.</p> <p>The anticipated reduction in the staffing and financial resources of LLDC from April 2025 onwards is likely to have some impact on LLDC’s ability to continue to directly deliver a range of existing projects and activities, as outlined in this assessment. As set out at the outset of this review, LLDC has prepared for this by working closely with partners to explore how they might step up and lead in these areas after April 2025, and a range of alternative funding sources and arrangements are also being explored. These discussions are ongoing.</p> <p>Responses from the Growth Boroughs to the LLDC Reduced Area consultation reiterated the broader imperative to address entrenched issues of inequality in and around the Park. Inclusive economy will remain at the heart of QEOP and the work of the future LLDC. LLDC is currently working closely with the Growth Boroughs and other Park partners to shape the approach to post-2025 Inclusive Economy activity and secure external funding for this.</p> <p>The transition to the next phase of LLDC is being undertaken noting that LLDC was formed with the purpose of regenerating its area and overseeing delivery of a meaningful physical, social, economic and community legacy from the 2012 Olympic and Paralympic Games. While there</p>

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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 continuing legacy agenda and there is increasingly effective collaboration with the Boroughs. Against this background, we consider that the changes are justified, notwithstanding the adverse impacts identified, but we will keep this under review with an open mind and on an ongoing basis.

LLDC will continue to work closely with the Growth Boroughs, its range of Park partners, and with local communities to ensure that Queen Elizabeth Olympic Park remains a place which is accessible and welcoming to all, regardless of disability, gender, race, ethnicity, or sexual orientation.

This EIA will be kept under review as future arrangements for the post-2025 oversight and operation of QEOP become clearer.

The London Legacy Development Corporation (Establishment) Order 2012

