

Just Space submission to London Assembly Planning and Regeneration Committee

Mayoral Development Corporations (MDCs)

Context

The experience of the pandemic changes so much. It affects different classes and categories of Londoners in such different ways, had some impacts which were immediate, during lockdown, others which are continuing and more which are yet to come like a wave of deferred evictions. Just Space is a network of community and activist groups across the city which —like everyone else— could not meet for months on end. But we wanted to take action on the urgency of the changes seen to be needed. This led about 60 groups to collaborate in putting together the [Community-led Recovery Plan for London](#), copies of which have been sent to all Assembly Members.

Central features of this recovery plan and its 44 policy proposals are the renewed focus on the locality, on lifetime neighbourhoods, the re-orientation of policy towards a caring city, away from a city of property development, and much more substantial emphasis on fairness and democracy in decision making. Unless and until London's massive inequalities of income and wealth can be changed, the most urgent need, made more visible by the pandemic, will continue to be a radical increase in social/council housing. These needs could not be met mainly through the Opportunity Area mechanism used so far this century. In this context the London Assembly's insistence on scrutiny of OAs is potentially crucial in re-thinking how London can solve its most pressing problems.

Earlier in this Assembly session the Planning and Regeneration committee had a brief discussion of Opportunity Areas with some GLA and Borough officers. They received written [input from Just Space](#) but no community representatives were otherwise involved. Just Space had summarised the very serious community criticisms of OAs which had arisen over the 20 years of London Plan activity and in many cases been supported by Inspectors of the Plans. We called for a complete halt on further designations until the completion of a thorough review of the programme to date, along with many changes in the way existing OAs are managed and monitored.

The Committee [recommended](#) some improvements in public consultation at the designation and planning stages of OAs and better monitoring plus a major review. Rather than initiating such a review, the Committee is saying the Mayor should do a review of OAs. We look forward to being consulted on the scoping study for any such review or - better still - being party to a more independent review.

Meanwhile academic research has added fresh terminology and analysis to the understanding of Opportunity Areas, including MDCs. Robinson and Attuyer (2021) characterise them as 'spaces of exception' where the normal planning rules of the city do not apply or are able to be flexed. (They also have a lot to say about OPDC - see below.) Fern and others (2021) use the phrase "soft areas" to contrast the relatively malleable planning policies and rules applying there with those found elsewhere in the city. Both teams emphasise the changing purposes for which OA designation has been used: the early OAs had been predominantly former railway and industrial lands which lent themselves to redevelopment for housing and/or contemporary employment needs. More recently, OAs

involve redevelopment of areas already built-up and occupied, and have been aimed at modernising infrastructure (with developments expected to carry the costs of major new transport infrastructure) and intensifying development of all kinds —but especially housing as part of the new conventional wisdom that it is imperative to maximise housing output without loss of Green Belt or spillover beyond the GLA boundary.

The Just Space submission on OAs and the Committee deliberations both paid little attention to the two OAs which are subject to Mayoral Development Corporations (MDCs) because these are to be considered at the next meeting of the Committee, postponed from March to June 2022 and now to November.

Just Space and its member groups have been actively engaged in both MDC areas despite there being absolutely no public resources to support such activity. This document collates the experiences of those groups and the experience in the EiPs of the two respective Local Plans and the London Plans. Some of the groups referred to here will also be submitting their own evidence to the Committee.¹ Contributions have come from the following though not all will necessarily subscribe to everything said.

- London Tenants Federation
- Games Monitor
- Grand Union Alliance GUA
- Old Oak Neighbourhood Forum OONF
- Harlesden Neighbourhood Forum HNF
- Save Hackney Wick

There is an important argument that most of what has been ‘developed’ in and around the Olympic Park would have happened anyway, or might even have happened sooner or better without the Games; that the wide LLDC boundary attributes benefits to the influence of the Games and dignifies what are really quite mundane property developments by associating them with the Olympics. The present submission does not address these issues though they have great weight and challenge the official history of East London. A statement from Julian Cheyne of Games Monitor is attached at JustSpace.org.uk/MDC

This submission seeks rather to examine the performance of the LLDC and of the OPDC from the standpoint of social justice: is it just (as in our name, Just Space) in delivering benefits to the deprived people of their localities and London, i.e. the justice of the impacts of development as between social classes and of the democratic processes involved.

In both cases it could be argued (and it is argued by many) that the normal processes of local government could have planned the development of the areas better than a development corporation did. This is a hypothetical question: what if history had been different? We touch on these questions especially in relation to LLDC and what should happen next and in the final section on whether, and under what conditions, the Mayoral Development Corporation idea should be used again.

Development Corporations in England

The development corporation model has been used successfully since the post-war period. From the late 1940s, new town development corporations (NTDCs) were established to deliver over 20 new towns across England, such as Telford and Milton Keynes. Then in the early 1980s, urban development corporations (UDCs) were used to lead the renewal of former industrial areas in many English cities, helping to transform areas such as London

Docklands and Royal Albert Dock in Liverpool. Since 2011, a new generation of mayoral development corporations (MDCs) has emerged to tackle complex development challenges in London and mayoral combined authority areas. It's important to emphasise key differences between these three versions.

- The postwar new towns were funded by low-interest long-term loans from the Treasury and were able to buy (mostly rural) land at existing use value. They thus captured a high proportion of land value uplift and were returning net profits by the time they were privatised in the 1980s.
- The Urban Development Corporations of the 1980s received a lot of public land when designated but had to pay market prices for any land which they subsequently bought. UDCs were funded through revenue and capital grants (not loans) from the Treasury, and they were never conceived as a land-value-capture mechanism: on the contrary, their job was mainly to spend public money to create attractive conditions for private investment.
- The latest Development Corporations, including the two in London, have to pay market prices (which often include prospects of development value) for any land they buy. Unless they can secure central government grants (which can come with strong conditions as in the HIF negotiated and lost by the OPDC), or the Mayor can raise loans against land (as in the case of the LLDC), they have no specific or guaranteed capital funding so they depend on up-front land value capture - either through S106 agreements or CIL. Funding of complex development is thus structurally difficult and most of the growth of land values is harvested by private interests within and beyond the designated areas and beyond the timescale of the scheme.

The Mayoral Development Corporation (MDC) emerged in the 2011 Localism Act, which made a number of changes to the GLA Act, and devolved a number of planning powers to the local level. This included a number of provisions regarding neighbourhood planning, consultation, and community right to build. Many of these tools, like the Neighbourhood Forum, offered the possibility for increasing democratic local engagement related to planning practices. On the other hand, following the 2008 financial crisis, the UK entered the long period of austerity, which radically reshaped the relationship between central and local government (Gray & Barford, 2018). In a seminal article that is widely applied in the UK (Hamnett, 2014; Davies & Blanco, 2017; Gray & Barford, 2018), Peck (2012) argues, drawing from the US context, that austerity can be concentrated at the urban level when the central state offloads a fiscal crisis onto local authorities by devolving powers without a sufficient revenue stream to support the provision of public services. Expanding the mandate of local authorities without the proper funding devolves conditions of austerity to the local level. This also incentivizes local governments to seek funding from other sources, notably from private sector investment, to fill the shortfall in public finances and public services. In the case of London, a major source of revenue to support housing and urban regeneration is developer contributions, negotiated through S106 agreements prepared during the course of planning applications. For MDCs, the lack of available funding to cover the costs of the regeneration (transport and general infrastructure as well as social infrastructure) exacerbates pressure to secure more revenue from developers, leading to an intensification of pressure to densify developments and cut corners on planning policy. The Mayor of London is permitted to designate development areas, the object of which is to “secure the regeneration of its area“ (*Localism Act 2011*, section 8 (2), ss 201). These pressures to secure funding through property development are evident in the two London MDCs.

An MDC is therefore both a development agency and a functional body of the GLA granted planning powers by Mayor Johnson. MDCs principally make Local Plans and do development management (processing planning applications and negotiating developer contributions). But the Localism Act enables them to also operate as developers in their own right. MDCs are not, however, housing or highway authorities, nor do they take over other borough powers. Their dual role as development agency and planning authority creates an inherent tension between the ‘delivery’ arm and the ‘planning authority’ arm within the MDCs, as the planning function should regulate the development function and determine clear policies which are applied in development management. This tension has been openly challenged in the case of both corporations as leading to compromises in the kinds of planning policies prepared, and in their implementation.

London Legacy Development Corporation LLDC

Antecedents to the LLDC; origins of Legacy and Convergence agendas

Bernstock (2014) presents a detailed review of the legacy of the Olympic project, providing context for the formation of the LLDC. She notes that “London’s approach to legacy is relatively unique in that it established an infrastructure to secure legacy in the pre-event phase” - dating back to the establishment of the London Thames Gateway Development Corporation in 2005 and the Olympic Development Authority in 2006 - but that during the protracted process, “those charged with leading on legacy both within individual agencies and the agencies themselves have changed and therefore it is fair to conclude that there has been a lack of continuity which is not conducive to legacy.” The formation of the LLDC in 2012 presented the opportunity for a unified governance body to manage development in the Park and surrounding Opportunity Area land, which had been expanded in each successive London Plan. However, the LLDC faced challenges reconciling the wider ill-defined Olympic legacy aims and the objectives of the host boroughs, attempting to deliver on an ill-defined social mandate. The social dimension of the mandate was diluted over years of administrative churn while the LLDC tried to fulfil its duties for development with insufficient funding. Meanwhile the boroughs all pursued actual policies (through planning and estate ‘regeneration’) which fostered gentrification. The outputs between 2010 and 2019 were as follows:

	Social Rented	Affordable Rent	Intermediate	Private /Market	TOTAL	% Social Rent	% Market
2010-19							
Barking & D.	737	536	711	3080	5064	15	61
Greenwich	2261	301	1550	9068	13180	17	69
Hackney	1269	350	1303	9276	12198	10	76
Newham	1270	327	1522	10686	13805	9	77
Tower Hamlets	2465	1181	1390	13386	18422	13	73
Waltham Forest	373	924	1102	3956	6355	6	62
TOTAL	8375	3619	7578	49452	69024	12	72

Source: [London Plan Annual Monitoring Report 16, 2018/19. March 2021. Mayor of London.](#)

Capacity for the pre-event preparation for the legacy aims and language surrounding Olympics can be traced all the way to the foundation of the London Development Agency

(LDA) in 2000, which was created for the purpose of coordinating inter-borough economic development. Working closely with the ODA, the LDA was instrumental in the execution of compulsory purchase orders that decanted residents and businesses in the Olympic Park from 2006 - 2011, and the consolidation of ownership of Olympic Park land in preparation for the games. The 2008 London mayoral election led to an overhaul of administrative responsibilities for the games, and key staff and control of land were transferred from the LDA, to the newly minted Olympic Park Legacy Company, an agency dedicated to the long-term planning of the Park.

From 2005 - 2012, the London Thames Gateway Development Corporation (LTGDC) oversaw planning in the Lea Valley area surrounding the Olympic Park. The agency was governed by the five host boroughs' partnership board, and eventually produced the 2009 Strategic Regeneration Framework/Convergence Framework that contested and amended the legacy aims, providing the opportunity to measure and monitor progress on the legacy planning frameworks over time. However this word 'convergence' was imprecise and misleading and the boroughs stopped pretending that it was their guiding principle when they wound down their monitoring from 2016.

When the London Legacy Development Corporation (LLDC) was established in 2012, it was given Development Control powers for the entire designated area, powers which were previously shared by the ODA, representing the interests of the Mayor, and the LTGDC, representing the interests of the Host Boroughs. This was aimed at solving the inconsistencies in sharing planning powers between multiple authorities. Local authorities opposed this shift, amid concerns by the host boroughs over a top-down emphasis on physical regeneration at the expense of social programmes and community investment to support existing residents, and a need to maintain constructive, direct relationships with each of the host boroughs.

The language used to describe the LLDC on its website shows the tension between local and regional aims, between community-focused reinvestment and wider growth objectives, in what is viewed as a singular opportunity to reimagine the area: *Formed in April 2012, the London Legacy Development Corporation's purpose is to use the once-in-a-lifetime opportunity of the London 2012 Games and the creation of Queen Elizabeth Olympic Park to develop a dynamic new heart for east London, creating opportunities for local people and driving innovation and growth in London and the UK. (LLDC Website; queenelizabetholympicpark.co.uk)*". In our review and experience of the LLDC, the community-focussed goals have been neglected.

Powers

The LLDC gathered the planning powers of the 5 boroughs with parts of their territory in its area, and took over the portfolios of the Olympic Park Legacy Company, the Thames Gateway Development Corporation, and the Olympic Delivery Authority. For reasons which were never made explicit the area designated included extensive land in the Opportunity Area but outside the Olympic Park, meaning much of the area had little or no relationship with the Games. The designation, as for any Opportunity Area, established housing and jobs targets for the area without consultation or public scrutiny. When the creation of the LLDC was ratified by the London Assembly, *Building Design* described the LLDC as "Britain's most powerful unelected planning body in modern times." (Hopkirk, 2012)

Money

We have not been able to explore the detailed financial history of the LLDC so this next comment is tentative. Our understanding is that the corporation was (and is) expected to generate profits to pay down some or all of the remaining debt incurred by its predecessor organisations in acquiring land, displacing 600 residents and many manufacturing and other firms, building the Games venues, infrastructure and Park and later converting the Stadium for football. Further loan financing from the GLA to enable development (c.£500million) places the risk of ensuring development returns firmly on the LLDC. The pressure to generate capital receipts in this way must have been a substantial influence on the corporation's priorities in favour of intensifying development and minimising its obligations to address the needs of local people and new residents.

Extending the logic of devolved austerity from the great financial crisis, the LLDC has been tasked with delivering revenue savings of £7.4 million in 2020-21 and £2.1 million in 2021-22 (23% and 8% of its revenue budget, respectively) in order to pay down the GLA's deficit. Incredibly, the LLDC is on track to meet these in-year savings requirements, despite a one third decrease in trading revenue. It is important to recognize that these savings mask serious "structural funding pressures over the medium term"; this is in large part because an inability to operate the London Stadium has reduced costs enough to account for 70% of these savings (London Assembly, 2021b). The London Stadium remains a loss-leader for the LLDC, costing a quarter of the LLDC's annual revenue expenditure from 2019-20. As the Assembly's budget and performance committee quipped "it is ironic that by having fewer large-scale events, thanks to COVID-19, the Park is haemorrhaging less money than if it were business as usual" (ibid).

Expected costs for the East Bank development have ballooned since the pandemic began. While cost-modelling is still inconclusive, confirmed costs have already increased by as much as £151 million since the pandemic began (London Assembly, 2021b). Additionally, the returns from the LLDC's major housing development sites are in question as materials cost and housing price inflation increase. Many of the new development sites are meant to deliver 50 percent affordable housing, which would require significant subsidy. It is unclear from where this funding will be secured. Given the demands to generate revenue returns to cover loans for infrastructure investment, S106 income seems unavailable to pay for affordable housing. Limited subsidy funding relies on participation of registered housing providers, and meeting overall housing targets as a priority has meant that higher cost housing products predominate. In large part because of the cost burden of capital projects the LLDC is estimated to have decreased in value by £381 million, as measured by net asset value (LLDC Annual Report 2012-13; 2019-20).

Weak statement of legacy for pre-existing residents

The LLDC initial brief was defined without enough precision. In particular it was never clearly stated that the corporation should ensure that benefits went to the pre-existing residents of the area. It was those residents whose deprivation had been such an important part of the London Olympic bid and it had been the prospect of their social and economic legacy (as well as sporting legacy) which had given the bid such momentum. In fact the establishment of the LLDC never embodied this objective clearly, relying instead on the imprecise concept of convergence. This was an enormous problem because, logically, convergence could be achieved by any combination of better health, welfare and income among the pre-existing communities or the dilution or replacement of poor people by new residents in better health,

income and welfare. To have distinguished between these two sources of ‘convergence’ would have required careful longitudinal research, the need for which was never established in the convergence monitoring unit established by the boroughs. In any event the monitoring unit was being wound down by the boroughs in 2016 and ended in 2018. (LTF/JS 2016)

This failure to stress the fundamental redistributive aims for the corporation’s work was carried through into the Draft Local Plan of 2017 and, despite strong community representations in the public consultations and EiP, remained the case in the adopted Local Plan of 2021 where the mission statement notes the objective of the LLDC as “creating opportunities for local people *and* driving innovation and growth in London *and* the UK” (LLDC, 2014, emphasis added). There is no clarity on how the LLDC would concretely prioritise these multiscale ambitions.

In fact it has been property development considerations which have been dominant in the corporation’s work. The narrative associated with their tourism, reinvestment, and growth objectives is clear and action-oriented. Objective 4 of the Vision statement reads that the LLDC will “secure the infrastructure required to support growth *and* convergence” (emphasis added).

Sagoe (2018) advanced three critiques of the governance of the LLDC. First, that the wider context of the English planning system at the time has structured the LLDC into “privileging economic growth goals, market-based criteria, the role of the private sector, financial considerations, and technocratic forms of governing within their housing and regeneration plans”; Second, the statutory arrangements have reinforced the influence of people who support these priorities on the Corporation’s plans, especially for housing and regeneration. Third, he found that participants who are challenging these policy goals and rationalities, and seeking to privilege social justice goals and principles, have had marginal influence on the LLDC’s plans.

Accountability and public engagement

The LLDC is governed by an appointed board of directors and describes itself as accountable to Londoners through the Mayor of London. The Mayor is able to direct LLDC in the exercise of its functions, and to delegate functions to it. But the ‘oversight’ role of the Mayor of London has been weak. Before 2016, the Mayor was represented at LLDC meetings by an ‘observer’, suggesting some degree of separation. Then after June 2016, Jules Pipe, who had been on the LLDC Board as Mayor of Hackney, seamlessly re-joined the Board in his new role as (London) Deputy Mayor for Planning. During the controversy over the demolition of Vittoria Wharf, the Mayor of London was asked by residents to scrutinise the LLDC’s conduct in relation to two bridges. They were never answered directly by the Mayor, only Jules Pipe, who offered no scrutiny. In this way, the LLDC and Mayor together put up an impenetrable barrier against the local public, representing the fundamental conflict of interest in the Mayor’s position as both the one who directs and appoints the LLDC and is mandated to ensure its oversight.

Further, In a highly unusual and irregular move, the LLDC assigned Board members to its planning committee, where they would be responsible for determining the LLDC’s own projects, in which the LLDC had a material interest. This represents a wider conflict of interest in the Corporation’s dual role as planning authority and developer, a conflict which is also apparent in the OPDC.

Although the Board and the Planning Committee have one elected councillor from each borough among their members, their voices are diluted by appointed members who dominate both. Our view is that this does not constitute an effective route to local accountability of the MDCs: community groups in the LLDC area have found it hard to build any sort of co-production or strong engagement with the corporation, despite some constructive consultation meetings in the early years. In the case of Vittoria Wharf, for example, concerns of Tower Hamlets Mayor John Biggs, representing his constituents, were ignored.

The LLDC was required, as the local planning authority, to make a Local Plan and take it through the public Examination process. In the LLDC case our members at the London Tenants Federation, who acted as support to local groups with some funding from the Trust for London, write “1. Having a Local Plan for the area covered by an OA has been valuable, bringing all the full opportunities for community participation including the EiP (that is, compared with many OAs where there is none of that). 2. Having a somewhat independent corporation responsible for doing the regeneration appeared at first to have some democratic benefits, providing a countervailing power centre to the one-party administration of Newham. It enabled a beleaguered and abused community at Carpenters to form the Greater Carpenters Neighbourhood Forum and do a community plan with what seemed to be a listening ear. However in the end LLDC deferred to Newham Council on most issues and, since LLDC was only the planning authority and did not get ownership of the land (including Carpenters), this was of limited value in the long run.”

The Corporation’s allocation of so much potential housing land in the Park for elite cultural institutions at East Bank may have made it harder for them to achieve their housing targets, tending to push towards densities at Carpenters higher than were compatible with the Greater Carpenters Neighbourhood Forum’s Community Plan. By this time the Trust for London funds which had supported LTF and Just Space in their work with the Neighbourhood Forum had been spent and there was thus no further support for the Forum’s efforts.

Another instance of the LLDC’s apparent disregard of community views was its decision to grant permission for the Madison Square Gardens (MSG) Sphere. This is the most recent example of how undemocratic planning has become when all the local borough representatives on the LLDC Board voted against this project but it was still passed.

In 2017 the Assembly’s Regeneration Committee asked the LLDC whether it had carried out customer satisfaction surveys of the residents and artists they had been engaging with. The LLDC replied they had “well over 80% customer satisfaction – we will give you the figures.” After an FOI request to find these figures, a table from 2016 was presented which listed satisfaction rates for a number of stakeholders, not including residents (attached at the end of this document). The focus was clearly on the Olympic Park, not the extended LLDC-controlled zones such as Hackney Wick / Fish Island, where there are high concentrations of residents. Residents conducted their own survey and found the vast majority did not feel they had been consulted by the LLDC or had any involvement in their plans.

Accountability and the loss of creative workspace

A successful, internationally recognised creative community grew up in Hackney Wick and Fish Island over ten years, starting in about 2006. The LLDC seemed to view this community as temporary: their housing development plans represented the future use of the land and

they did not value the creative industries and low-cost space. Some of these spaces, such as Vittoria Wharf / Stour Space were established community hubs that could have provided for both incoming and existing populations, as there is a notable lack of such spaces within the new housing developments.

Wanting to demolish Vittoria Wharf, the LLDC and the Mayor of London claimed re-provision of low cost artists' workspace would be through 8,400 sqm of space in the Hackney Wick Masterplan Area and at Here East. These were outside Fish Island and would not support Fish Island's extensive creative community, as 8,400 sqm was only 10% of the low-cost creative space in occupation across Hackney Wick Fish Island at the time. Rents would be much higher also.

In 2016 the Assembly's planning committee chaired by Navin Shah AM conducted a meeting at Vittoria Wharf and wrote the report titled '[Creative Tensions](#)' which urged the Mayor to tackle the need for affordable creative workspace and recommended that the proposed demolition of Vittoria Wharf should be reviewed. [Shah letter at [JustSpace.org.uk/MDC](#)]

The Save Hackney Wick campaign strongly opposed the demolition of Vittoria Wharf, a waterside industrial building containing artists' studios and named an Asset of Community Value, which was caused by plans to build a footbridge (H16) and road bridge (H14) between Fish Island and the former Olympic park. The road bridge would bring through-traffic into Fish Island, a rare low-traffic area, and would enable a new, polluting, road system through the Park. A map is at the end of this document.

The LLDC's main justification for the bridges was an extant permission dating from the early Olympics plans in 2007. The plans conflicted with Mayor Khan's pledges to improve air quality, reduce traffic and safeguard creative work spaces: in fact, the bridges would make each of these problems worse. The project was not justified in transport terms: even a feasibility study by the LLDC did not support the principle of the footbridge. Each bridge would cost an estimated £3 million but the LLDC never revealed the actual cost to the taxpayer.

There were 1,600 local objections to the demolition and bridges, including from local MP Rushanara Ali and the Tower Hamlets mayor John Biggs, who opposed H16 footbridge and wanted revisions to the road bridge. There were also 6,300 petition signatures.

The LLDC steadfastly ignored and rejected all calls to re-examine the project, claiming the bridges were a 'requirement' of the 'Sweetwater' development, a joint venture on the former Olympic Park by the LLDC as landowners, Balfour Beatty and Places for People. This 'requirement' was never explained and it again highlighted the conflict of interest involved in the LLDC's combined roles as landowner, developer and planning authority. Save Hackney Wick reported on the Mayor's and LLDC's false or misleading statements given at this time. [see Nine False Statements at [JustSpace.org.uk/MDC](#)]

Cross-party Assembly members Russell, Gavron, Boff and Shah, who wrote letters to the Mayor, Jules Pipe and the LLDC in support of local people, will recall the impossibility of changing their course. They wrote to Peter Hendy following his Confirmation Hearing as LLDC Chair (July 2017) of the need to engage with the community representatives and asked for a halt to demolition plans. A final cross-party letter (2018) presses the Unanswered Questions in relation to the Mayor and the LLDC's actions.

Both the acting LLDC Chair, who was also Chair of the Planning Committee, and the CEO ignored Save Hackney Wick campaign's request that the LLDC Board - as applicants for the bridges project - re-think the principle of their bridges instead of solely relying on the formal procedures of the planning process, which did not permit discussion due to the extant permissions (which they had awarded themselves).

Responding to the strength of feeling from the community, Nick Bitel was the only Board member to raise doubts about the process, saying: "I don't think that we ever as a Board really had much discussion in the light of the complaints, as to whether or not we thought it was sensible that those bridges should go ahead. That decision came some time ago, and when it became clear it was a controversial matter touching on the reputation of the LLDC. I wonder if at that point someone should have brought it back." (LLDC Board minutes)

CEO David Goldstone's reply was: "We definitely did have a discussion with investment committee members...it may have been an informal meeting, partly for that reason, because it would be difficult for board members with planning committee obligations." (LLDC Board minutes) There is no record or proof of any discussion in the Investment Committee's minutes. These conflicting roles within the LLDC as both developer and planning authority ensured that the building of the bridges and demolition of Vittoria Wharf were never questioned.

Delivery of housing to meet local needs

The Kerslake Review of GLA housing delivery (2022) has what are presumably the latest available statistics on housing output in the LLDC area:

- 3.78. Across the MDC, as a planning authority, LLDC has a target to deliver 33,000 new homes by 2036. By March 2021, 11,519 homes have been built across the MDC supported by LLDC's planning functions, including 23 per cent affordable housing.
- 3.79. On land owned by LLDC, there is a target to deliver 5,774 homes by 2032. Between 2016-17 to 2021-22 LLDC has delivered 923 homes on its own land, including 39 per cent affordable housing.

The Corporation in its Annual Monitoring Report for 2020/21 does give some breakdown of the "affordable" total (LLDC 2020/21), showing that only 10% of the year's completed dwellings were at Social or London Affordable rents although the total for all "affordable" categories was 25% of all completions to that date. Figures at borough level are tabulated on page 5 above. There is a good deal of text suggesting that the affordable proportion may increase in future years and the corporation has applied much of the cash-in-lieu of in-kind S106 contributions to pushing up the "affordable" content of the Chobham Farm scheme to get as close as they have to their target.

In view of the predominant London-wide need for low-rent housing and the even more pressing needs in Newham and East London more widely, this is a deeply unsatisfactory housing performance, especially from a body which has inherited so much public land. A member of the LLDC Planning Decisions Committee, Cllr Sharman concluded in a memorandum that the housing output in the LLDC territory was overwhelmingly causing gentrification, not meeting local need, and is thus the reverse of what had been promised in the Olympic Games 'Legacy' statements (at [JustSpace.org.uk/MDC](https://www.justspace.org.uk/MDC))

LLDC: conclusion

We consider that the Assembly P&R Committee should report on three topics:

1. **The outcomes of the LLDC's work have been very disappointing.** Above all they have failed to secure substantial benefits as a positive legacy for the deprived communities of East London in whose interests the Olympic and Paralympic Bid had been promoted and the Games launched. Because developments of predominantly market homes in the relevant boroughs have also contributed to gentrification, house price and rent rises in and around Newham, the net effects on those poor communities are often negative even though a few hundreds have benefitted from new 'affordable' housing production. The monitoring and research which would have been needed to gauge these effects and their beneficiaries was initially weak and was later discontinued. The Corporation's conflicting founding objectives were partly to blame, leading to community needs being deprioritised. So too was their failure to represent pre-existing communities in their decision structures, planning and personnel.

2. There was a fatal built-in **conflict of interest** between the LLDC's role as a planning authority, making the Local Plan and determining applications, and its role as a landowner/developer and thus often an applicant for its own permissions. The planning role of deciding on the objectives of the local plan as a democratic body and then carrying out development management according to the policies of the plan was too often subordinated to the financial interests and wider development aims of the Corporation. This is a general concern, and we have also documented some specific cases where this conflict was particularly controversial.

3. **Ongoing work of LLDC:** We understand that the LLDC is likely soon to be disbanded (Kerslake 2022 §3.80). Some functions, notably planning, would then revert to the boroughs. That separation is probably to be welcomed. However some agency/ies will be needed to manage the land, buildings and services of the Park and the Assembly should put its weight behind demands that whatever new or existing bodies are given these responsibilities have a clear brief to prioritise legacy benefits for established poor communities and to ensure that those communities have a strong direct voice in the services to be provided, the prices charged and so on.

The Assembly should also press for the reinstatement of effective monitoring of the social and economic impacts of the developments, including by longitudinal studies of people and enterprises affected so that the emancipation of previously deprived people can be distinguished from their dilution and displacement by richer people.

We indicate the **wider implications for MDCs in general**, after the discussion of the OPDC.

Old Oak Park Royal Development Corporation OPDC

Initiation

The Old Oak and Park Royal Development Corporation (OPDC) is the second MDC commissioned in London, formed in April 2015 to coordinate the substantial regeneration and development potential associated with the construction of the HS2 and Crossrail projects in the Old Oak area. Its founding [document](#) says “The principle objective is to establish a single body which possesses the necessary planning powers to co-ordinate regeneration, development and physical transformation across three London Boroughs. It is the Mayor’s intention that this will be achieved through a strong plan, clear direction and governance structure that will support this scale of development for the benefit of the area and the communities that surround it.” In response to consultation summarised in the founding document, it was agreed that existing business and residents would each have a seat on the Board, while elected councillors from the three boroughs would serve on the Planning Committee. Periodic reviews were to take place, the first in 2017.

Powers

The complexity of the challenges faced by the OPDC were and are immense: the effective integration of the transport interchanges, after the HS2 and Crossrail projects were already far advanced; the redevelopment potential of the existing industrial and railway lands is substantial but requires costly new physical and social infrastructure to enable a high quality new bit of London to be realised. The challenge evidently calls for extensive coordination of planning and implementation amongst the three boroughs and the GLA. Interacting informally was seen to be insufficient and the creation of a new special agency was seen by the then Mayor as necessary.

The OPDC is the Planning Authority for the OPDC area, responsible for developing and implementing planning policy. It thus formulates policy and has development management functions, including negotiating, processing and approving planning applications. Like the LLDC, it has a delivery arm which can undertake development in its own right (not simply overseeing the activities of private developers). The relationship amongst these different activities has been a cause of concern for local residents. A “Chinese wall” between planning and development functions is widely discussed. However, policy developments have been strongly influenced by negotiations with private developers, i.e. the development management function. This is closely associated with the need to generate finance for the onerous infrastructure needs of the area. Planning policy has also responded to OPDC initiatives to undertake developments in their own right without any formal planning applications or consultations (as in the attempt to secure central government funding to CPO 25% of the land of a major landowner).

The Old Oak Neighbourhood Forum (OONF) has long felt that the development management function dominates policy development, and that the delivery team wins battles within OPDC and compromises the neutral and objective determination of major applications in line with the democratically-influenced development plan. This tension can exist in any LPA undertaking its own developments, but is more acute in the MDCs given the scale of

ambition and targets. As part of ongoing community concerns regarding the governance of OPDC, Old Oak Neighbourhood Forum has pushed the corporation into drawing up a Local Planning Authority and Delivery Agent Protocol (OPDC 2019) But from an outside perspective it seems that the delivery teams have become more dominant in recent years. This conflict of interest between planning and development functions (both in terms of development management and in the OPDC's role as a developer) parallels the conflict described for the LLDC above. But for the OPDC this is arguably even more serious given the absence of any funding or asset base.

Money

The OPDC is tasked with ambitious development plans, estimated to cost between £1.5bn and £2.5bn in infrastructure and affordable housing costs, but with no capital funding and no adequate mechanism for capturing land value growth on a sufficient scale. In this context, the role of planning gain (S106 incomes), rather than being used to mitigate the planning implications of a development, is the prime source of development financing. S106 receipts are largely unable to be directed to addressing community infrastructure needs; rather, the efforts to secure additional financing from this source are having extreme impacts on existing residents, including loss of key community assets (as in the developer-initiated removal of a local pentecostal church and numerous associated community functions from 2 Scrubs Lane, in an extremely deprived community). The resultant developments are producing a sub-optimal built environment for existing and future residents. As it stands, the development must fund itself - by pushing developments to include extremely tall buildings (a number over 50 stories), at higher densities.

As recognized by Pinson (2009) and reinforced by Robinson and others (2016; 2020) the governance of development in London under conditions of fiscal austerity has taken the form of an intense version of 'governing by project', wherein the value gains generated on-site through the intensification of land use are relied upon to fund the development. One of the main tools for development funding is developer contributions (S106) that are derived from future expected profit from the development arising within the development area. There is a direct trade-off between different uses of this money —for affordable housing, or for infrastructure, for producing policy-compliant play spaces or open spaces— and the intensification of schemes.

As development in London is generally self-funded in this way, most projects are paid for by direct developer contributions rather than from pooled tax income streams at a municipal level or from general/national taxation. In their case study on the Old Oak Park Royal Development Corporation, Robinson & Attuyer (2021) treat the OPDC as paradigmatic of a "London-style" of extractive development, writing that large-scale urban development in London like the OPDC "exposes an idiosyncratic regulatory regime characterised by significant territorial fragmentation and intensifying reliance on highly delimited planning gain incomes to support all the costs of the development, including substantial infrastructure and welfare provision." This is not a simple story of international speculation and the abdication of a social mandate by local authorities. Rather, it is important to focus on how the administrative and financial procedure for development and planning in local councils has become tied to development financing. Stated in another way: "because of the state's dependence on planning gains to finance their operations under conditions of austerity, in the normal course of good-faith operations to secure "'public' benefit [...] state actors also intensify the function of the developer to generate the resources needed to realise state interests" (ibid).

Because of the scale of ambition, the MDC exacerbates the conflict of interest between planning policy and determination of planning applications, in which plan-making bodies are expected to intensify developments and minimise social infrastructure provision (and affordable housing) to deliver sufficient financing to ensure the overall development programme is paid for.

The lack of funding for infrastructure development made inter-jurisdictional cooperation between the GLA, the OPDC and the three London boroughs hosting the redevelopment scheme fundamental to realising the project. To some extent, then, as in the LLDC, there is access for democratic representatives to influence the process. But as in the LLDC, these representatives are out-voted by the Mayor's own appointees on both the OPDC Board and the OPDC Planning Committee, again denying any meaning to the Mayor's oversight function. Moreover, the OPDC has undermined and refused to support neighbourhood planning in its area, consenting only to a very truncated OONF area which has no overlap with any areas planned for development, and inclusion of a very small portion of the extreme edge of the OPDC in the Harlesden NF which otherwise lies mostly outside the OPDC area in Brent. One can speculate that this is to ensure there is no allocation of S106 funds to community control through neighbourhood planning.

This evidence has focused on the Old Oak part of the OPDC's territory. The Corporation area also includes **Park Royal**. This area has seen initiatives to collaborate with business organisations (including a business representative on the OPDC Board and for a time a designated OPDC employee to build business networks). Park Royal was also the focus of some Lottery and Arts Council England funding secured by the OPDC, "Great Places". These activities have been seen quite positively by some business interests and landowners. However, consequent on London Plan directives to protect the quantity of Strategic Industrial Land in the OPDC area, and the exclusion of the Car Giant land from the Local Plan, the pressure to intensify development in Park Royal has grown. At the same time, industrial land values across London have risen sharply, as a result of demand from major logistics companies and for sites for large data centres. The OPDC's latest planning policy envisages a wholesale "regeneration" of Park Royal, with no provision for protection or replacement of existing businesses or jobs. In terms of resultant employment numbers, the new developments in Park Royal include a number of data centres which do not generate high levels of employees. It appears that planning policy and property market pressures will gradually extinguish or displace many existing firms. As a major employment centre, and London's largest remaining Industrial cluster, there appears not to be an adequate OPDC attention to the future of the existing firms and their workers (more than 1700 businesses and more than 43,000 jobs are at stake in the OPDC area). It is hard to see this as meeting the Mayor's targets of "good growth" - for the Mayor's Development Corporation to extinguish a major industrial and employment district.

Performance and Public Engagement

The far flung residential and business communities around the area had not worked together prior to the OPDC, and have benefited from innovation and support to participate effectively in local planning processes. The London Tenants Federation and Just Space, with grant support from Trust for London, helped establish the Grand Union Alliance of local organisations across the boroughs as an initial response, informed partly by community group experiences with the LLDC. An application to establish a neighbourhood forum covering the 280 hectare Old Oak half of the MDC/Opportunity Area was refused and a smaller 22 hectare area outside the OPDC allowed to proceed in East Acton, while the Old Oak Neighbourhood Forum was confined to existing residential areas not slated for

development. More generally, the corporation's public engagement in the development of its plans appeared to start constructively with positive and open engagement with community ideas, including maintaining lower rise buildings on the sensitive edges to the development adjacent to existing neighbourhoods. But since 2016 these engagements have become increasingly reluctant and inadequate, despite the negotiation and adoption of the Statement of Community Involvement (SCI) supporting community engagement in both plan development and planning application review. This SCI was considered to be innovative at the time. The details of this worsening engagement record are set out in the OONF's submission to the OPDC Planning Committee (OONF May 2022). Low points in engagement included the secretive Master-planning process associated with the HIF and repeated revisions to the Local Plan through numerous versions, with limited advance public consultation on changes.

The Harlesden NF had hopes of benefiting from improved stations and social infrastructure and much improved connectivity to and beyond the canal as the early plans were hammered out for the northern area of OPDC. However the sluggish pace, the withdrawal of Car Giant and the subsequent scramble by developers for scraps of land was a great disappointment, leaving residents with no improvements in prospect and much to lose as they find themselves sharing social infrastructure with large new populations while heavy construction traffic worsens their already poor air quality. Reflective of the way in which development management priorities (and securing financing) are in tension with planning policy development, residents have described the evolving plans for Scrubs Lane "as written backwards to accommodate permissions already granted". More broadly the OPDC Local Plan has moved in the direction of encouraging very tall buildings anywhere in the development area (losing the sensitive edges negotiated with GUA and OONF), with no clarity as to the proposed heights of buildings, even in close proximity to existing uses.

The Local Plan which emerged in draft in 2017 tried to square the circle of solving these problems but was subject to heavy challenges which were sustained through an Examination in Public which extended over 4 years. The Inspector found the Car Giant part of the plan 'unviable' and required it to be excluded from the site allocation, effectively sending the plan back for further work and requiring a reduction in the ten-year housing target and rephrasing of planned output into later periods. A patchwork of development sites open to intense developments now constitutes the focus of the plan, rather than a coherent and integrated new piece of London.

Local groups persuaded the Inspector to hold extra EIP hearings in January 2022. One of these was on whether the Draft Plan conforms with the new London Plan Policy D9 on tall buildings. The Inspector told OPDC officers to come up with further modifications and there were many further changes made in these final months, though without further public consultation or - according to the public record - approval by the OPDC or its Planning Committee. This meant that even the minimal local public engagement via the elected councillors on the Committee was by-passed (OONF Feb 2022). While the original Statement of Community Involvement was hailed as a positive achievement when adopted, there have been breaches of this agreement with regards to the commitment in the SCI for OPDC to hold 'stakeholder workshops' at early pre-application stage on major schemes, involving applicants, planning officers, and local residents. OONF is awaiting a response from OPDC's Director of Planning on whether they will hold such sessions on a number of current schemes in the pipeline. An innovative Community Review Group has been appointed by the OPDC, which provides scope for community-based perspectives on planning applications in progress. However, these are purely advisory and seem to have had little impact, as in the case of a recent development brought forward by Imperial College

London, where concerns about open and play space, lack of community facilities, affordable housing, and building heights and design were ignored.

Local community groups have challenged the origins and appropriateness of the 25,000 housing target for the OPDC Local Plan at every stage of the process. This target was set in the London Plan prior to being tested in planning policy, and has been used by the OPDC to justify development densities, and sustained by the Mayor despite changes to the London Plan by Planning Inspectors to clarify that such targets should be seen as purely indicative. Residents continue to try to fight off applications for hyper-dense buildings at North Acton (the current one being an application from Imperial College for two 55 storey towers and one 56 storey tower as part of a 7-building development, with segregated provision of affordable housing in a separate building on a busy road, and off-site) and have written in April 2022 to the OPDC calling for urgent talks on the latest modifications to the Plan and on the cumulative nature and impact of the various planning applications and proposals for North Acton (OONF 12 April 2022).

In many ways the most remarkable failing of the OPDC had been the misleading assertion it made to government in a bid for infrastructure funding that Car Giant was behind their plans when in fact the firm had explicitly withdrawn. This episode led to the loss of scarce infrastructure funding, without which it is extremely hard to see how the development of the designated area can be achieved. The report of the Assembly's Scrutiny Committee explored this in detail (London Assembly 2021).

In addition to the impacts of the extreme challenges the OPDC faces to finance delivery of a new neighbourhood for London which meets the needs of existing and future residents, this section has outlined how the OPDC has failed to operate to adequate standards, alienating the major developer through questionable secretive processes; failing to operate an open and engaged process of planning policy development; has backtracked on public engagements to mitigate the impacts of the development on existing areas; and has failed to implement agreements to ensure public engagement in planning applications. Residents (current and future) are bearing the brunt of both the financial and operational inadequacies.

Delivery of housing to meet local needs

The Kerslake inquiry into GLA housing delivery (2022) is the most recent report on housing outputs and plans in the OPDC area. It says

- *3.96. Across the MDC, as a planning authority, OPDC has a ten-year London Plan target to deliver 13,600 homes and a long-term target to deliver 25,500 new homes. By March 2021, 3,032 homes have been started across the MDC supported by OPDC's planning functions, including 430 student homes.*

It adds that no dwellings have been started yet by direct provision - i.e. provision by OPDC or its partners. Thus perforce, no 'affordable' dwellings other than those secured via S106 have been started.

We should add that student homes carry no S106 affordable housing obligations and that the extensive production of Build-to-Rent (BtR) also avoids affordable housing obligations on the normal scale, having instead a proportion of "discounted market rent". Student rooms are

normally scaled down so that 2.5 student rooms are treated as 1 unit of housing output for target purposes.

We find data on social (council) rent dwelling output or plans from the OPDC less than comprehensive, and the data in the Kerslake report is only for the aggregate “affordable” category. We echo the demand of the Assembly Planning and Regeneration Committee in its recent recommendations (2022) on Opportunity Areas that the Mayor should monitor and publish, among other variables, housing outputs broken down by both size and tenure (including rent levels). The OPDC Annual Monitoring Report for 2020/21 does give figures for that year showing that, of the total “affordable” dwellings (219 habitable rooms) “secured” 194 were intermediate, i.e. for shared ownership or London Living Rent while only 25 (4% of the habitable rooms) were in the combined category of Social Rent + London Affordable Rent. Furthermore, ALL of these “affordable” homes have been in the North Acton part of the designated area where development management is delegated by OPDC to Ealing Council. Further detail from this OPDC report on the houses “secured” via S106 agreements to date suggests that a total of 4035 houses have been approved, with 61 of those being social rent, so only 1.5% of the total - 28% by Habitable Room of the overall affordable rent housing products negotiated, which make up 24% of all affordable homes. By contrast, shared ownership makes up 59%. Most social rent level housing is being delivered as 3-bed units, which are certainly in need, but recording by habitable rooms exaggerates the impact on housing need and minimises the impact on developers’ profitability. Intermediate housing forms 76% of affordable homes provided, largely two bed shared ownership along with 34% at the highest discounted market rents. This is a very long way from the objective assessed housing need of the three constituent boroughs, and especially of the OPDC’s surrounding areas, amongst the poorest in London.

It is hard to escape the conclusion that the production of the low rent homes which are the urgent need at London level and locally have become a very low priority for the OPDC, with developers circumventing the real needs and the Mayor’s requirements very effectively. However the repeated revisions designed to generate enough planning gain to pay for all the infrastructure, meet the profit expectations of land owners and achieve target proportions of social and “affordable” housing have led to escalations in building heights and densities way beyond what was envisaged and negotiated with communities in the earlier stages of planning (agreed by all community parties and recorded in Robinson & Attuyer 2021).

OPDC: conclusion

We urge the Committee to report on at least these 3 issues:

1. Financing and Planning: The MDC model adds limited value as a ‘co-ordinating’ agency unless underpinned with substantial Government funding for infrastructure alongside the funding expected from on-site planning gain as a form of land value capture. In fact, our experience suggests that the scale of ambition associated with an MDC in the absence of funding yields very poor outcomes for residents and extremely poor delivery on affordable housing, notably at social rents. Robinson and Attuyer (2020) note that an overreliance on developer contributions brings with it attendant constraints on project viability, forcing a reduction in affordable housing, and an increase in concessions on building height and density as a means of development financing. The tendency has been for planning policy and public engagement to be overridden by concerns to finance development. Given that the OPDC area for development is now simply a fragmented collection of sites for development, better immediate

and long term outcomes for housing delivery and 'place-making' might be achieved by alternative arrangements.

2. In terms of local knowledge and accountability, a 'corporation' model which replaces elected Borough councillors with Mayoral appointees was always going to carry risks of diminishing feedback and views from constituents and local residents. This has become increasingly evident at OPDC in recent years. The OPDC Board meeting on March 24th was inquorate despite the attendance of two new Mayoral appointees, increasing the size of the Board to 14 members. Borough Leaders do not always bother to attend and appointees have little affinity with the local area. A local community leader previously on the Board was not replaced with any similarly-connected people when her term expired. Boards made up largely of appointees see reduced questioning and challenge, and a drift towards 'group think'. The preparation and extensive modification of the OPDC Local Plan became very largely an officer-led exercise, with, in our view, the OPDC 'delivery arm' in the ascendancy over 'planning' colleagues.

3. Governance concerns. While both the LLDC and OPDC operate on a statutory basis, their internal organisation culture has proved weak when it comes to basic issues of governance and transparency (e.g. refusals of FoI/EIR requests, meetings and key discussions conducted in private sessions).

The London Assembly has made occasional efforts to scrutinise the work of both the OPDC and LLDC, but has no resources to carry out detailed reviews. Public focus and media attention on the activities of the OPDC has proved to be surprisingly limited over the 2015-22 period. The Corporation keeps a low profile, having issued an average of 7 press releases a year. Many of these have covered appointments of Board members and individual staff, or have been 'good news' stories on peripheral activities rather than on core planning concerns.

Conclusions - on MDCs generally

Across the LLDC and the OPDC we have observed:

1. The ambition of an MDC has intensified development to secure financing; and has led to governance failures in pursuit of these goals
2. The accountability of MDCs is compromised by the lack of local voice on the boards and planning committee and by the Mayor's conflicts of interest in appointing and directing the MDC, and being responsible for oversight. The Development Corporations have undermined statutory requirements for neighbourhood planning.
3. There are significant conflicts of interest between planning policy and the management of development, and with Development Corporations acting as developer.

The Committee may want to give thought and make proposals on the MDC mechanism as such and its deployment on future London projects. That would need more debate than is conceivable within the June 2022 meeting and might best be pursued within the larger evaluation of Opportunity Areas which has already been mandated.

Development Corporations could be claimed to offer benefits of single-minded (even mission-oriented) attention to a purpose, put together, directed and staffed for that purpose and with unambiguous objectives from the outset. And by gathering and channelling money from various sources together they should offer clear financial transparency. But could those benefits be combined with stronger oversight of internal governance, and a democratic accountability to the citizens and workers of the areas where they operate? There is a risk of reducing democracy by layering an inscrutable appointed organisation on top of the borough machinery, itself often doubtfully democratic. Additionally, the need to shore up finance through intensifying developments can lead to less than transparent governance and diminished engagement with the wider public and affected communities.

No amount of clever design of special agencies could solve the problem that big development on complex sites cannot be achieved by organisations which don't own the land and don't have the money. Major urban transformations in our sort of economy boost land values both within their patch and also for miles around and for years to come but the current London model simply tries to capture some of this value through initial negotiated developer contributions and high value developments. Then, when that doesn't offer all the social infrastructure and social housing that is needed, additional density and height are added to an extent that is unacceptable to citizens and environmentally dangerous. This will be a problem of Opportunity Areas whether or not they have MDCs, but MDCs magnify the ambition and scale of development in ways that have become harmful to sustainable development in London.

To reiterate the scope of this submission and place it within the greater literature of Just Space publications: this is a descriptive document analysing the performance of Mayoral Development Corporations. It is not the place to propose detailed new approaches to London's development; over the years, Just Space has published a large body of critical, prescriptive work reflecting community opinions and analysis, and has a lot to say about alternative visions for planning elsewhere.

A few key publications include the Just Space response to the Mayor's Housing Strategy ([linked here](#)) and the Just Space response to the draft London Plan ([linked here](#)). Most recently, in the wake of the pandemic, Just Space released its *Community-led Recovery Plan for London* ([linked here](#)). Beyond these major publications, Just Space serves as a platform for community voices, regularly publishing supporting documents from community groups and activists ([see publications here](#)). This particular submission is inter-relates with this wider array of literature, which add nuance and an additional range of perspectives on issues related to community planning that could not be accommodated within the scope of this document.

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Overall and audience approval ratings



2016	TOTAL	Tenants / Event Organisers / Operators	Developers	Neighbouring landowners	Community Groups / Local Business	Interested/ influencers
Overall rating 2016	82%	84%	89%	94%	81%	76%
Overall rating 2015	88%	93%	97%	99%	77%	85%
Change	-6%	-9%	-8%	-5%	+4%	-9%

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