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Dear Mayor Sadiq Khan

## **Draft New London Plan: Representations from Moorfields Eye Hospital NHS Foundation Trust and UCL Institute of Ophthalmology**

The following outlines the representations from Moorfields Eye Hospital NHS Foundation Trust and the UCL Institute of Ophthalmology on the key policies within the draft London Plan.

### **Project Oriel**

Our core belief is what motivates all of us on a day-to-day basis and this belief underpins the vision and objectives for Project Oriel. Our sight is a critically important sense. Sadly, sight loss is an increasing reality for many people - every five seconds someone in the world goes blind. It is estimated that by 2050 there will be 4 million people in the UK living with sight loss. The ageing population is adding to this challenge, resulting in greater and more complex demand for eye services as one in five people over the age of 75 live with sight loss.

The experience of losing sight is distressing, can be isolating and costly for the individuals affected. Putting the people affected by sight loss at the centre of care is essential if we are to support their needs. We are motivated by the core belief that people's sight matters. Project Oriol will enable delivery of this core belief by providing an environment in which innovation can flourish, inspiring improvements in people's sight.

## **The Partners**

Moorfields Eye Hospital NHS Foundation Trust ("Moorfields") is the leading provider of eye health services in London and the wider UK. Over the last 200 years it has developed a national and international reputation for providing the highest quality of ophthalmic care. It employs 2300 staff, focused on eye healthcare. Services are commissioned from commissioners across the UK but, its largest contracts are with London NHS Clinical Commissioning Groups (CCGs) from North West London, South West London, North East London and North Central London. Moorfields has over 40% of the London market and is by far the largest provider of inpatient and outpatient hospital ophthalmology services in England, over double the size of the second largest ophthalmic provider.

University College London (UCL) is consistently ranked as one of the world's leading universities, with over 11,000 staff and nearly 40,000 students. It is the top-rated university in the UK for research strength, as rated in the Research Excellence Framework (REF) 2014, the system for assessing the quality of research in the UK higher education sector. UCL is a long-standing centre of excellence in biomedical science subjects and is internationally recognised for its strength within the field of biomedical research.

UCL Institute of Ophthalmology ("IoO") is a world-class centre of excellence. Working closely with Moorfields, the two organisations combine high quality eye healthcare with ophthalmic research and education, which directly benefits 100,000s of Londoners every year.

Moorfields and IoO in their own rights have significant established global reputations of excellence and are top-ranked internationally as stand-alone institutions in the field of ophthalmology, providing globally-recognised research, excellent education and outstanding clinical care. As a collaborative partnership, they build on these individual strengths. The outcome is a partnership assessed as 'the best in the world for research in ophthalmology' and 'the world leader in eye-disorder prevention and treatment' (Boston Consulting, 2012). The partnership is the only joint University Clinical



NHS Partnership in the UK that is ranked number one globally in any medical field.

Together, Moorfields and UCL IoO are progressing life changing eye disease research on conditions such as glaucoma, diabetes, age related macular degeneration, children's eyes and vision, ocular surface disease and ocular repair regeneration and pharmaceuticals.

In 2016/17:

- Moorfields had 729,351 patient contacts, with more than 586,000 outpatients and over 102,000 visits to its A&E.
- Moorfields supported 125 active projects, recruiting over 2,000 patients to clinical studies,
- IoO had 142 active research grants.
- Moorfields and IoO together published over 600 research papers.

The Moorfields City Road site is the organisation's central London base, and provides comprehensive general and specialist outpatient, diagnostic and surgical services, emergency surgery and a 24 hour A&E. Most research and teaching activities are also based at City Road. It houses the world's largest children's eye centre, the Richard Desmond Children's Eye Centre. It is supported by an extensive portfolio of over 30 sites, located in London and the south east of England, bringing eye health care nearer to patients homes and work. The patients seen at these sites directly benefit from the collaborative partnership of Moorfields and IoO.

The IoO site in Bath Street adjoins Moorfields and provides research and educational facilities. Neighbouring the hospital allows collaborative working between the organisations and through Moorfields network of sites benefits the wider population.

Jointly the partners' aim is to continue to be world-leading in eye-disorder prevention and treatment using a translational model of research and care. The principles of translational research span the fields of research, education and clinical care. It is recognised as a highly effective process by leading global healthcare and research institutions. Translational research provides a continuum of innovative research, education and clinical care with the aim of increasing the scale and speed of progress from scientific discovery to patient and societal benefits.

The London Plan consultation is an opportunity for Moorfields and UCL to highlight with the Mayor the importance of their combined proposals for Project Oriel, which is to build a new eye hospital, research and educational facility at the preferred St

Pancras Hospital site. In developing a new facility, the partners aspire to create the best possible patient experience, attract and empower their people, invent and innovate together to be at the leading edge, educate people to be the very best and drive efficiency and effectiveness.

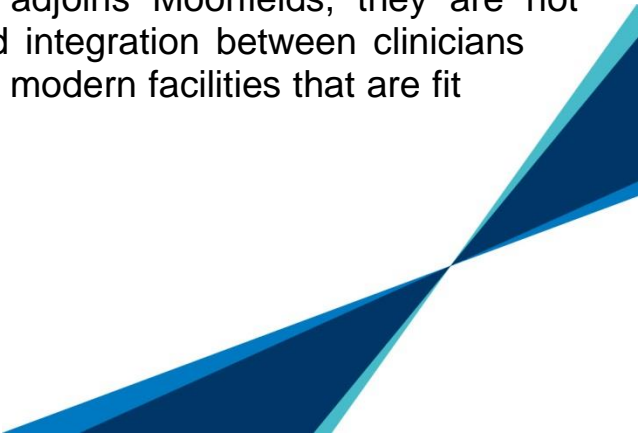
The funding of the new facility hinges on the ability to maximize the value of the City Road Island sites.

### *The future of Moorfields Eye Hospital and the Institute of Ophthalmology*

While the partnership is ranked as the world leader in the field of ophthalmology, it must constantly evolve in order to maintain this position in the light of an increasingly competitive global translational research arena. The partnership's existing infrastructure is no longer fit for the purposes for which it was originally intended, does not maximise opportunities to deliver sustainable and excellent science and in the case of the hospital, does not meet patient expectations. The infrastructure is significantly limiting the ability of the partners to continue delivering excellence due to the constraints of historic design, fragmentation, highly inefficient layout, the lack of interlinking, and the lack of space for growth.

The hospital has been the subject of piecemeal modifications, refurbishments and upgrading works over a period of time. It is increasingly difficult to ensure compliance with statutory requirements and best practice. Backlog maintenance was assessed by Moorfields in November 2016 at £66m. Even if this level of investment was made, continued investment would then be required to keep the buildings in an acceptable state. The limitations of the estate mean that the Trust would still not be able to deliver truly pioneering care.

The IoO site comprises several linked buildings which have been developed on a piecemeal basis over a number of years. The latest condition survey shows the buildings have been maintained to a fair standard, but due to the age and original life expectancy of some of the components and buildings, most notably the temporary lecture cabins, a proportion of the estate is in need of replacement. The current premises were constructed primarily with a view to fundamental research activities, with limited space available for education activities. Currently education activities are primarily delivered from temporary building structures behind the main Institute of Ophthalmology building on Bath Street. Research activity is inhibited by the poor estate and inadequate adjacencies within the estate. While the IoO site adjoins Moorfields, they are not physically linked. To foster greater collaboration and integration between clinicians and researchers, there is a need to co-locate in more modern facilities that are fit



for 21<sup>st</sup> century research, education and care.

UCL and Moorfields have stated strategic ambitions, recognised at board /governingcouncil level, for the development of an integrated, co-located health, education and research facility to be developed in the St Pancras area to ensure the ongoing success of the joint partnership of Moorfields and UCL Institute of Ophthalmology. This is recognised in Moorfields 'Our vision of excellence' strategy 2017-2022, UCL's 2034 Strategy, and UCL's Faculty of Brain Sciences Strategy 2015-2018.


This strong ambition is robustly underpinned at a local, regional and national level.

Moorfields is part of the North Central London estates devolution pilot, which is the umbrella group in North Central London, whose aim is to work collaboratively to produce a joint timeline for decision-making and estates planning. This project is the anchor scheme for the pilot. Moorfields is also an integral part of the North Central London Sustainability and Transformation Plan (STP), which is the local health and social care plan to ensure necessary transformation is realised over the next five years which will lead to a sustainable local health economy. The STP's Case for Change recognises one of the key areas of focus will be to address: 'buildings that are old, expensive to run and not fit for purpose, and develop buildings that support patient and clinical needs'.

Project Oriel is a prioritised scheme within the STP and is fully aligned with the STP's strategic direction. The STP states the proposed development of the St. Pancras site (the preferred location option) would 'develop world class research facilities for... ophthalmology enabling practice to reflect the best evidence'.

Moorfields has been planning a new hospital for many years, but the lack of a suitable and affordable site has hindered this aim. The collaboration with IoO has accelerated the need to find a new site. This proved difficult in London where competition for sites is fierce and where sites of the magnitude required and with good accessibility are very difficult to secure. The St Pancras Hospital site offers a once in a generation opportunity to relocate Moorfields and IoO together.

If action is not taken, the success of the partnership is under severe threat. The partners are unable to develop and expand leading edge research programmes, entice and retain the best people, attract necessary investment, train the next generation of researchers and clinicians, and provide the standard of care a growing patient population requires in the 21st century.



Given the constrained and fully occupied nature of the existing City Road site, only a re-development off-site offers a practical long-term solution. The preferred location is at St Pancras, close to the Francis Crick Institute, other academic institutions and complimentary organisations in the MedCity cluster.

The significant source of funding for the new facility will derive from the disposal of the City Road island site for alternative uses.

### *Representations on the Draft London Plan Policies*

**Policy GG2 Making the best use of land** prioritises the development of opportunity areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned tube and rail stations, sites within and on the edge of town centres, and small sites.

Development should *“proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach.”*

Those involved in planning and development must *“Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London’s distinct and varied character.”*

We welcome and support this policy. The City Road island site is not surplus public sector land and is required to facilitate the development of a future facility, ideally at St Pancras. The City Road Island site is significantly under developed given its highly accessible and central location. Further, it is a brownfield site adjacent to the City Fringe Opportunity Area.

In addition, the preferred St Pancras site will become surplus to the requirements of the Camden and Islington NHS Foundation Trust once healthcare service changes and re-locations have taken place from that site.

**Policy GG3 Creating a healthy city** seeks to improve Londoners’ health and reduce health inequalities through various means including by ensuring that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities.

We strongly support the aims of this policy. As set out above, Moorfields and UCL together are the world leaders in ophthalmology. The benefits to Londoners health are significant by the presence and collaboration of these two organisations. This is under significant threat from fundamental defects in the current estate. To ensure London continues to benefit from the successes of these organisation, they must move to new and improved facilities.


**Policy GG5 Growing a good economy** seeks to conserve and enhance London's global economic competitiveness. Part of this involves ensuring that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and center for learning.

We strongly support the aims of this policy. Given the status of Moorfields and UCL, the work undertaken here and the international influence, these two organisations are a clear and demonstrable manifestation of London's global competitiveness. If this competitiveness is to be conserved and enhanced, the new facility at St Pancras will give them the best possible opportunity. Furthermore, by bringing Moorfields and UCL in to the MedCity cluster, there will be further opportunities to benefit from agglomeration and to encourage the development of new organisations around them.

**Policy GG6 Increasing efficiency and resilience** aims to help London become a more efficient and resilient city through measures including, taking an integrated approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.

Moorfields and UCL, given the influence these organisations have in the local, regional, national and international field of ophthalmology should be considered as strategic infrastructure for London. The coordination of the delivery of a new facility involves a number of major organisations working together for the benefit of Londoners and this policy is thus welcomed.

**Policy SD4 The Central Activities Zone (CAZ)** sets out that *“The unique international, national and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions as well as local uses, should be promoted and enhanced.”* And *“(G) The CAZ as a centre of excellence and specialist clusters including functions of state, health, law, education, creative and cultural activities, and other more local Special Policy Areas should be supported and promoted.”*



The supporting text sets out the strategic priorities of the CAZ. These include but are not limited to: (e) centers of excellence for higher and further education and research, and (f) centers of medical excellence and associated specialist facilities.

We welcome the strength of policy support for education, research and medical excellence. However, it is not definitively clear whether the preferred St Pancras Hospital site sits within the CAZ or adjacent to it. If it is the latter, we would strongly urge the CAZ boundary to be extended to include the entirety of the preferred St Pancras Hospital site given its future development potential as a new home for Moorfields and UCL and also for the other parts of the site.

**Policy H1 Increasing housing supply** supports the redevelopment of surplus utilities and public sector owned sites for housing delivery. Islington's Ten-year housing target (2019/20 – 2028-29) is identified as 7,750 equating to an annualised average of 775.

We welcome this policy though noting that the City Road island sites are not surplus public sector land. However, it has the ability to deliver a strategic quantum of housing in a highly accessible location to the benefit of Islington and London as a whole.

**Policy S1 Developing London's social infrastructure** sets out that *“Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.”*

The policy goes on to stipulate that: *“Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless:*

- 1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood, or;*
- 2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services.*

This policy is strongly supported. In relation to the City Road island site, the best use of the site is to subsidise the creation of a new, integrated research hospital. The creation of this new facility on public sector land represents an important rationalisation of these two estates for the benefit of Londoners.





Furthermore, there will be no loss of the services that Moorfields and IoO provide. It is envisaged that there will be a decant from the City Road island site to the preferred St Pancras site with continuity of service throughout. Also, given the regional and national catchment of the facility and the excellent public transport, the relocation to the neighbouring borough will have a minimal impact on patient access.

We welcome the recognition of the North Central Strategic Transformation Plan (STP) through this policy and note that the STP is completely in alignment with these proposals.

**Policy S2 Health and social care facilities** states:

*A Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:*


- 1) identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies*
- 2) understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes*
- 3) regularly assess the need for health and social care facilities locally and sub-regionally, addressing borough and CCG cross-boundary issues*
- 4) identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision*
- 5) identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.*

*B Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported.*

*C New facilities should be easily accessible by public transport, cycling and walking.*

The supporting text sets out the following:

*Development and regeneration proposals for an area provide an opportunity to re-think how land and buildings are used and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation*



*and release of surplus land for other priorities. The London Estates Board aims to improve the way surplus and underused NHS assets are identified and released, and provide a single forum for estate discussions in London, ensuring early involvement of London Government partners. Membership includes NHS partners, local Government, the GLA and national partners (central Government, NHS England, One Public Estate and the national NHS property companies).*

We strongly welcome and support this policy. We are encouraged by the dLP's requirement that boroughs should work with the NHS and that boroughs should take account of NHS Five Year Forward View, regional strategic health policy documents and the STP. The relocation of Moorfields and IoO is recognised throughout these documents and goes to the heart of the future of these two institutions.

We also strongly support the policy for release of buildings and land for other uses. While we have noted the City Road island site is not surplus, its release for other uses is crucial to the successful role Moorfields and IoO play in local, regional and national health provision and international research and learning.

We also welcome the support for high quality new and enhanced facilities such as those proposed at the preferred St Pancras hospital site. This is particularly relevant where public transport accessibility is so high.

Lastly, we also welcome the recognition of the London Estates Board and the role it can play in facilitating the swift re-use of assets, particularly those involved in this project at St Pancras Hospital and the City Road island site.

**Policy E8 Sector growth opportunities and clusters** seeks to ensure sufficient space for laboratories and theatres. Furthermore, the policy aims for '*Innovation, including London's role as a location for research and development should be supported*'. In addition, '*London's higher and further education institutions and their development across all parts of London should be promoted*'. Furthermore, '*Clusters such as Tech City and MedCity should be promoted*'.

The supporting text to this policy also goes on to highlight the life sciences sector as a particular opportunity. Specifically, the golden triangle of London, Oxford and Cambridge and within that, the MedCity area of London.

We strongly support this policy and welcome the vision of drawing together all the different facets of life sciences and promoting these through the dLP. Translation from research to clinical work is at the heart of the partnership between Moorfields and

UCL and collocating this new facility in the MedCity area of London can only be a greater benefit.

Yours sincerely

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