

BCP HEALTH AND WELLBEING BOARD



Report subject	Pharmaceutical Needs Assessment: Supplementary statement
Meeting date	20 July 2023
Status	Public Report
Executive summary	To update on changes since the Pharmaceutical Needs Assessment (PNA) was published in October 2022.
Recommendations	<p>It is RECOMMENDED that:</p> <p>The Board</p> <p>(a) approve publication of the supplementary statement.</p> <p>(b) delegate authority to the Director of Public Health to publish such further statements as required.</p> <p>(c) note response to NHS England on a consolidation request</p>
Reason for recommendations	<p>Each Health and Wellbeing Board must publish a PNA under section 128A of the NHS Act 2006 (amended). Part 2 of the NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013 sets out the detailed requirements. The Board must publish a new PNA every 3 years, or where there are significant changes. A Supplementary Statement can explain changes to the availability of pharmaceutical services, where:</p> <p>(i) There has been a change to the availability of pharmaceutical services and this change is relevant to the granting of applications to open a new, or relocate a pharmacy; or to provide additional services; and</p> <p>(ii) the HWB is satisfied that the publication of a revised PNA would be a disproportionate response or is already in the process of producing an updated PNA but is satisfied that there is a need for a supplementary statement in order to prevent significant detriment to the provision of pharmaceutical services.</p> <p>As further changes in pharmacy services are expected it would be helpful if further supplementary statements could be issued as they occur, hence the delegation to the Director of Public Health.</p>

Portfolio Holder(s):	Councillor David Brown, Portfolio Holder Health and Wellbeing
Corporate Director	Sam Crowe, Director of Public Health
Contributors	Jane Horne, Consultant in Public Health
Wards	All
Classification	For Decision

Background

1. The Pharmaceutical Needs Assessment (PNA) is a statement of the need for pharmaceutical services in an area. In September 2021 BCP Health and Wellbeing Board agreed to develop a single PNA to cover both the BCP and Dorset Health and Wellbeing Board areas.
2. The latest PNA was published in October 2022.
3. Since then, there have been changes in the availability of pharmaceutical services. Three pharmacies in BCP have closed, 2 pharmacies in Dorset council area have changed ownership, and we are aware of applications for a further change of ownership in DC and a consolidation of two pharmacies onto one site in Poole. A recent application for relocation in DC has been declined.

Lloyds Pharmacy changes

4. Following a national review, Lloyds Pharmacy plans to close all its outlets inside Sainsbury's this year. The three BCP closures are because of this plan.
5. The closest alternative pharmacy for Lloyds in Castlepoint is the Boots at Castlepoint (1 minute on foot). For the Lloyds at Talbot Heath, the nearest alternative is in Wallisdown, 4 minutes by car or 12 minutes on foot. The Lloyds inside Christchurch Sainsbury's held a 100-hour contract. The nearest alternative pharmacy is in Somerford (4 minutes by car or 7 minutes on foot), however, this has a standard 40-hour contract so does not have the extended opening hours that the Christchurch pharmacy had. The nearest alternative 100-hour pharmacies are Castle Lane, or in New Milton, Hampshire, between 12 and 17 minutes by car.
6. In closing the pharmacies Lloyds is responsible for communication to patients about this, including supporting vulnerable patients to nominate a new pharmacy and contacting patients where medication has not been collected close to the closure date.
7. There are no further Lloyds pharmacies inside Sainsbury's across Dorset. However, Lloyds Pharmacy nationally have also sold, or are in discussion about selling, many of their other pharmacies.

8. We have ten remaining Lloyds' pharmacies. It is not yet clear whether locally we can expect further closures or changes of ownership, as Lloyds continue to review the need for their remaining pharmacies.

Choice of Supplementary statement or revised PNA

9. The Department of Health and Social Care publish guidance to support health and wellbeing boards develop their PNAs. This includes guidance on whether changes should result in producing a new PNA.
10. Core members of the virtual PNA Steering group, who oversaw the publication of the October 2022 PNA, considered the guidance and the changes in pharmaceutical services to date. They agreed that it was disproportionate to produce a new PNA including public consultation at this time because:
- It is not yet clear that the situation has stabilised,
 - The current PNA does not identify any gaps, and an initial look at the data suggests that using a 20-minute drive time this would not change,
 - If the PNA were to identify gaps in the areas where closures have occurred, it is unclear whether there would be capacity for other community pharmacies to pick this up.
 - New legislation came into force 25 May 2023 that may result in further changes to 100-hour pharmacies over the next few months.
11. A supplementary statement has therefore been drafted that sets out those changes that have already occurred. Once issued it will become part of the PNA.

Summary of financial implications

12. There are no significant financial implications from this report. Activity previously delivered at pharmacies that have now closed will be picked up either by other community pharmacies in the vicinity or through distance-selling pharmacies (online pharmacies).

Summary of legal implications

13. The NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013 came into effect in April 2013 in line with changes in the NHS at that time. Responsibility for developing, updating and publishing local PNAs shifted to Health and Wellbeing Boards in local authorities.
14. The Regulations require PNAs to be reviewed and published every three years, however for the most recent PNA this interval was extended due to COVID.
15. The Regulations set out a Schedule of Information and a minimum 60-day consultation period with specified consultees as part of the development process.
16. Section 198 of the Health and Social Care Act allows two or more Health and Wellbeing Boards to make joint arrangements in how they discharge their functions. All local PNAs published since 2013 have been developed as a single PNA to cover the whole Dorset system.

17. The PNA is used by NHS England, via Primary Care Support England, to support commissioning intentions for pharmaceutical services and forms the basis for their decisions to:
- grant applications for new pharmacies
 - grant applications to change the premises from which a listed pharmacy business is allowed to provide pharmaceutical services
 - change the pharmaceutical services that a listed pharmacy business provides.
18. The Health and Wellbeing Board is a statutory consultee for such applications to NHS England.
19. Schedule 2, paragraph 19(5) of the Regulations 2013 (as amended) requires Health and Wellbeing Boards to respond on applications to consolidate two pharmacies on one site. Appendix 2 sets out the recent response to a consolidation application for BCP.

Summary of human resources implications

20. There are no direct HR implications of the report.
21. The PNA published in October 2022 concluded that based on the consultation on the draft PNA the current pharmacy workforce challenge is a high priority for the Dorset system to address. Pharmacy leaders in Dorset recognise the workforce challenges in relation to registered Pharmacists and Pharmacy technicians. Various initiatives have been underway since 2019 to address some of the challenges, but none of them are likely to have rapid results.

Summary of environmental impact

22. The analysis within the 2022 PNA considered access, with drive time as the key measure. To balance access against the need for travel within the rural areas of the county, the PNA Steering Group agreed a 20-minute drive time as the right maximum cut-off to identify gaps.
23. When seeking views from local stakeholders about the recent application to consolidate two sites into one, comments highlighted that in the more urban area it may be appropriate to use different access criteria. Comments were incorporated into the consolidation response (appendix 2) and will be fed into the next PNA development round.

Summary of public health implications

24. Community pharmacies are a vital community asset. They see high footfall in places convenient to the local population. They may provide other services as well as pharmaceutical services. These may include public health services.
25. The 2022 PNA identified 142 community pharmacies in across Dorset (74 in BCP Council and 68 in Dorset Council), plus 2 distance selling pharmacies. All provide essential pharmaceutical services. The PNA stated that there is appropriate provision for the Dorset population, with no current gaps.

Summary of equality implications

26. The 2022 PNA included formal consultation. One of the questions asked about any consideration required to make sure services do not have adverse impacts on any specific groups of people. Comments were incorporated into a first stage Equality Impact Assessment (EQIA) for the PNA.

Summary of risk assessment

27. Risk that the PNA is not sufficiently robust will fall on the commissioner of pharmaceutical services as there is a risk of challenge to their decision making. NHS England delegated commissioning responsibility to NHS Dorset in April 2023.

28. Risk from closures of community pharmacies will also fall on public health who commission public health services from community pharmacies.

29. Risk is currently considered to be LOW.

Background papers

- [Development of the PNA - HWB paper 14 October 2021](#)
- [Pharmaceutical Needs Assessment \(PNA\) - 2022-2025](#)
- [The National Health Service \(Pharmaceutical and Local Pharmaceutical Services\) Regulations 2013 \(legislation.gov.uk\)](#)
- [DHSC - pharmaceutical-needs-assessment-information-pack \(October 2021\).pdf](#)

Appendices

Appendix 1: Dorset PNA Supplementary statement, June 2023.

Appendix 2: Response on behalf of BCP Health and Wellbeing Board

Appendix 1: Supplementary Statement

Supplementary statement to the Public Health Dorset Pharmaceutical Needs Assessment 2022 – 2025, published October 2022

Public Health Dorset produced the 2022 PNA for Bournemouth, Christchurch and Poole (BCP) Health and Wellbeing Board, and Dorset Health and Wellbeing Board.

Date supplementary statement issued: July 2023

1. Closing of a pharmacy

The following pharmacies have closed:

- Lloyds in Sainsburys at 1 Lyndhurst Road, Christchurch (FHL51)
This was a 100-hour pharmacy. It closed on 13 March 2023.
- Lloyds in Sainsburys at Castlepoint, Bournemouth (FDL19)
This was a 40-hour pharmacy. It closed on 18 April 2023.
- Lloyds in Sainsburys at Talbot Heath, Poole (FRH25)
This was a 40-hour pharmacy. It closed on 18 April 2023.

2. Change of ownership

The following pharmacies have changed ownership:

- the pharmacy at 1 Frederick Treves House, St. Johns Way, Poundbury, Dorchester.
Aunpharma took over the ownership from Rowlands pharmacy on 1 March 2023. The new trading name is Poundbury Pharmacy (FN115)
- the pharmacy at 26 Abbotsbury Road, Weymouth.
Weymouth Pharma took over the ownership from Boots on 24 April 2023. The new trading name is Weymouth Pharmacy (FPN51).

Supplementary statement issued by: Jane Horne

Post: Consultant in Public Health

Date: to be added

Sent via email to:
PCSE, Market Entry

Date: 5 April 2023
Ref: **ME2383 - CAS-193016-G7V8V1**
Email: publichealth-enquiries@dorsetcouncil.gov.uk
Tel: 01202 224400

Dear Colleague,

Re: ME2383 - L Rowland & Co (Retail) Ltd - CONSOL - BH15 2PG - CAS-193016-G7V8V1

Thank you for advising us of this application for consolidation of two pharmacies onto one site. This letter sets out the Bournemouth, Christchurch and Poole (BCP) Health and Wellbeing Board view as required under Schedule 2, paragraph 19(5) of the NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013.

The Dorset Pharmaceutical Needs Assessment (PNA), published in October 2022 and available at [Pharmaceutical Needs Assessment \(PNA\) - Public Health Dorset](#) uses a definition of necessary services as dispensing of medicines and other essential services within a 20-minute drive time. The PNA notes that, based on this definition, there are no current gaps in the provision of necessary services identified in any of the localities across BCP Council. Although there is housing growth planned, based on the information available at the time of developing the PNA no future gaps have been identified in any of the localities across BCP council.

The application is for Rowlands pharmacy, currently at 315 Wimborne Road to consolidate with the Rowlands pharmacy at 14 Parkstone Road. There are other pharmacies within the local area and this change would have no impact on overall 20-minute drive time to pharmacies within the locality. The application confirms that there will be no reduction in opening hours, and that all the services currently offered between the two pharmacies will continue to be available at the 14 Parkstone site.

Based on the above, the application does not create a gap in pharmaceutical services. However, in discussion with local stakeholders there was strong support that consolidation on the 315 Wimborne Road site would provide a better spread of pharmacies leading to improved choice and better access than consolidation on the 14 Parkstone Road site.

We also noted that the application does not make specific reference to staffing levels, although we know that there is a shortage of pharmacists in Dorset. Consolidation may go some way to ensure that we make the best use of our staff, so further assurance that staffing levels will reflect the consolidated workload would be helpful. In particular assurance on continued levels of access to pharmacy professional advice and that there would be no reduction in activity for advanced services such as the New Medicines Service, Community Pharmacist Consultation service or Hypertension case-finding service would be helpful.

Yours sincerely

On behalf of the BCP Health and Wellbeing Board