



Although a formal committee of Brighton & Hove City Council, the Health & Wellbeing Board has a remit which includes matters relating to the Clinical Commissioning Group (CCG), the Local Safeguarding Board for Children and Adults and Healthwatch.

Title: **Pharmaceutical Needs Assessment**

Date of Meeting: **10th July 2018**

Report of: **Alistair Hill, Director of Public Health on behalf of Brighton & Hove Pharmaceutical Needs Assessment Steering Group**

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Wards Affected: **All**

FOR GENERAL RELEASE

Executive Summary

The Health and Wellbeing Board (HWB) has a statutory responsibility to publish a revised Pharmaceutical Needs Assessment (PNA) every three years. The PNA maps current pharmaceutical services, identifying gaps and exploring possible future needs. It's used by NHS England to decide upon applications to open new pharmacies and informs the commissioning of pharmaceutical services.

The most recent PNA was approved by the HWB in March 2018 and published in April 2018. This followed an extensive range of surveys with the public and professionals about the provision of local pharmacy services; as well as a statutory two month public consultation.

An application has now been received by NHS England from Paydens Ltd to consolidate two pharmacies (Paydens Ltd trading as Ashtons Pharmacy, 98 Dyke Road, Brighton, BN1 3JD and Canterbury Pharmacies Ltd, trading as Watt & Co Chemist, 110 Dyke Road, Brighton, BN1 3TE).

Under the NHS (Pharmaceutical and Local Pharmaceutical Services) regulations 2013 Regulation 26A, the HWB is required to make a written representation to NHS England indicating whether, if the application were granted, the proposed

closure of the pharmacy and its removal from the pharmaceutical list would or would not create a gap in pharmaceutical services. NHS England must refuse an application if it would create a gap in pharmaceutical services and the HWB must publish a supplementary statement if the closure does not create gap in pharmaceutical services. This is to prevent future unsuccessful applications to replace the closing pharmacy – as there is no gap to be filled.

The purpose of this paper is to request for the HWB to make a representation to NHS England that the proposed consolidation of the two pharmacies would not create a gap in pharmaceutical services and to approve the process for delegating authority to the Director of Public Health, in liaison with the Chair of the HWB and PNA Steering Group, if requests for consolidation of pharmacies falls within a 45 day time period that the HWB is not meeting.

Glossary of Terms

Chapter 11 is a Table of abbreviations used in the report.

1. Decisions, recommendations and any options

- 1.1 That the Board agrees that the following representation should be made to NHS England:
The Board requests that NHS England ensures that the proposed consolidation of two pharmacies (Paydens Ltd trading as Ashtons Pharmacy, 98 Dyke Road, Brighton, BN1 3JD and Canterbury Pharmacies Ltd, trading as Watt & Co Chemist, 110 Dyke Road, Brighton, BN1 3TE) does not create a gap in pharmaceutical services; the Board would like assurance regarding the space available and if this is sufficient for the demand required by patients, details regarding the number of pharmacists available to provide services in the consolidated pharmacy in comparison to across both sites when open and whether the time to prepare and provide prescriptions will be increased.
- 1.2 If answers to the above issues are that that the consolidation of the pharmacy will not reduce service provision, the Board seeks assurances that the proposed consolidation of the two pharmacies would not create a gap in pharmaceutical services that could be met by a routine application to meet a current or future need for pharmaceutical services, secure improvements, or better access, to pharmaceutical services.
- 1.3 The Board approves delegating authority to the Director of Public Health in liaison with the Chair of the HWB and the PNA Steering Group for sending representations to NHS England, if a request for a consolidation of a pharmacy happens within 45 days when the HWB is not meeting.

2. Relevant information

- 2.1 Paragraph 19(5), Schedule 2 of the NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013 (as amended) requires the Health and Wellbeing Board to make representations on consolidation applications to NHS England. Those representations must (in addition to any other matter

about which the Health and Wellbeing Board wishes to make representations) indicate whether, if the application were granted, in the opinion of the Health and Wellbeing Board the proposed removal of premises from the pharmaceutical list would or would not create a gap in pharmaceutical services that could be met by a routine application (a) to meet a current or future need for pharmaceutical services, or (b) to secure improvements, or better access, to pharmaceutical services. The Health and Wellbeing Board's representations should be sent 45 days following receipt of the letter. The letter from NHS England was received by the Health and Wellbeing Board Friday 8th June 2018, after having being sent to the incorrect address. The 45 day period officially started by NHS England on 27th April 2018. Considering the circumstances an extension has been given for the HWB to respond by 15th July 2018.

- 2.2 At the HWB meeting March 2018, the Board approved the process for supplementary statements delegating authority to the Director of Public Health working with the PNA Steering Group to identify and implement any future amendments to the PNA and to bring back a full revised PNA to the HWB in April 2021. As this consolidation of a pharmacy results in a closure this is being reported to the HWB. For future consolidation of pharmacies if these fall within a time whereby the HWB is not meeting, it is requested that approval for such a consolidation is delegated to the Director of Public Health in liaison with the Chair of the HWB and the PNA Steering Group.
- 2.3 The merger and consolidation of these two pharmacies will reduce the number of pharmacies in the city from 56 to 55 (including one distance selling online pharmacy). This translates to 19 pharmacies per 100,000 residents,¹ excluding the distance selling pharmacy compared to a range of 18 to 26 per 100,000 for our comparable local authority neighbours (where 2018 PNA data has been published) with a median of 19 per 100,000. This is the same as 19 per 100,000 for Kent, Surrey and Sussex and lower than 22 for England. The PNA Steering Group has previously concluded this number of pharmacies and pharmacists is sufficient to meet pharmaceutical needs of residents in Brighton and Hove. This due the proximity of pharmacies in the city and the increasing numbers of pharmacist roles (such as through the Better Care work) and the numbers of non-medical prescribers which supports increased access to pharmaceutical advice and support overall.
- 2.4 In terms of any loss of service provision resulting from this merger, the PNA Steering Group does not think a gap is being created because the remaining merged pharmacy (Ashtons Pharmacy, 98 Dyke Road) will continue to be open for 91 hours per week and will offer the same range of advanced and enhanced services, as well as those previously provided by the 40 hour pharmacy at Canterbury Pharmacies Ltd, trading as Watt & Co Chemist, 110 Dyke Road. The application confirms there will be no reduction of services offered or interruption to service provision. Chlamydia screening, condom supply and emergency contraception are the services that Ashtons was not providing and following this consolidation will start to provide. This change

¹ This is based on Office of National Statistics mid-year estimates 2016.

strengthens the opportunity for the pharmacy to better integrate services, offering a broader range of enhanced services within one location.

- 2.3 In terms of any loss of geographical access to pharmacy services, the PNA Steering Group does not think a gap is being created by this change. The two pharmacies proposing to consolidate are approximately 110m apart either side Seven Dials roundabout. There is also another Pharmacy (Charter) approximately 500m by road from Seven Dials roundabout.
- 2.4 The PNA steering group will continue to monitor impact on the capacity of all pharmacies in the city regarding workload.
- 2.5 Other changes to pharmacies since publication of the PNA are changes of ownership to Glenhazel Ltd for Healthy U Pharmacy, 59, Lustrells Vale, Saltdean and Traherne Pharmacy 13, Hove Park Villas and a change in hours for the Traherne Pharmacy from 8.30-6.30 pm to 9.00 – 6.30 pm.

3. Important considerations and implications

Legal:

- 3.1 The National Health Service (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013 (“the Regulations”) Regulation 26A set out the legislative basis and requirements of the Health and Wellbeing Board to review applications for consolidation of two or more pharmacies. The proposals set out in this paper are consistent with the requirements of the Health and Wellbeing Board as set out in the Regulations. The H&WB does not have the power to make a decision on the matter, but it can make representations to NHS England.

Lawyer consulted: Elizabeth Culbert

Date 13th June 2018

Finance:

- 3.2 There are no financial implications as a direct result of this application.

Finance Officer consulted: David Ellis

Date 12th June 2018

Equalities:

- 3.3 Equality Act 2010 requirements were incorporated within the full PNA document. During the PNA process we took into consideration protected characteristics and vulnerable groups at each stage of the process and details relating to how services affect different groups are detailed in the main report.

A review has been conducted regarding access issues relating to the consolidated pharmacy premises. The consolidated pharmacy premises at Ashtons Pharmacy, 98 Dyke Road will have wheelchair access and has a separate consultation room, which is the same level of access as the Canterbury pharmacy. An in-depth review will be undertaken to look at equalities issues relating to future supplementary statements and PNAs.

Equalities Officer consulted: Sarah Tighe-Ford

Date 12th June 2018