



*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:	19th March 2019	
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 Pharma Supply Ltd to consolidate two pharmacies (Blake's Pharmacy, 91, Blatchington Road, Hove, BN3 3YG with Trinity Pharmacy, 3 Goldstone Villas, Hove, BN3 3AT).

Under the NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013 (the Regulations), 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 a 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, subject to having received certain assurances as detailed in the report.

### **Glossary of Terms**

**HWB** – Health and Wellbeing Board

**PNA** – Pharmaceutical Needs Assessment

**NHS England** – National Health Service England

## **1. Decisions, recommendations and any options**

- 1.1 That the Board agrees that the following representation should be made to NHS England:
  - a) That the proposed consolidation of two pharmacies (Pharma Supply Ltd trading as Blake's Pharmacy, 91 Blatchington Road, Hove, BN3 3YG with Trinity Pharmacy, 3 Goldstone Villas, Hove, BN3 3AT) does not create a gap in pharmaceutical services subject to receiving confirmation from Pharma Supply Ltd that the number of pharmacists available to provide services in the consolidated pharmacy, in comparison to the previous number across both sites, will be sufficient to prepare and provide prescriptions without causing untoward delays.
  - b) The Board further notes that there is a reduction in hours due to lunchtime closure and asks whether this can be rectified by Trinity Pharmacy and whether the pharmacy can have a loop fitted for people with hearing impairments.
- 1.2 If the response to the above issues is that the consolidation of the pharmacies will not reduce service provision, then the Board would not consider that a gap in services is being created as defined in the Regulations.

## 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 Tuesday February 12<sup>th</sup> 2019, with a response due from the HWB within 45 days i.e. by March 29<sup>th</sup> 2019.
- 2.2 At the HWB meeting in 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. A supplementary statement has been published to record the previous consolidation which took place August 2018.
- 2.3 The consolidation of pharmacies is a growing national trend. Primary Care Commissioning advises that nationally there were 12 applications for consolidations of pharmacies in 2017/18 and 23 in 2018/19 (as at 25.02.19). The South East region has had the second highest number of applications over this period (8) after the North Midlands (9).
- 2.4 The merger and consolidation of Blake's and Trinity pharmacies will reduce the number of pharmacies in the city from 55 to 54 (including one distance selling online pharmacy). This translates to 18 pharmacies per 100,000 residents,<sup>1</sup> (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). The median provision of pharmacies in 2018 in Kent, Surrey and Sussex was 19 per 100,000 and 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 is due to the proximity of pharmacies in the city and the increasing numbers of pharmacist roles and the numbers of non-medical prescribers which supports increased access to pharmaceutical advice and support overall in the city. The recently published JSNA on Adults with Multiple Long Term Conditions (2019) identified the following pharmaceutical roles in the community: Clinical medication reviews and

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<sup>1</sup> This is based on Office of National Statistics mid-year estimates 2016.

prescribing advice carried out by CCG Medicines Optimisation Pharmacists and Pharmacy Technicians and Consultant cardiac pharmacist; Medicines optimisation in Care Homes and Cluster Pharmacists who identify patients at high risk of frailty.

- 2.5 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 pharmacy has four other pharmacies within 1 km distance of the closed pharmacy, which is only 500 meters from the remaining pharmacy. In addition the provision of enhanced services will be increased at the remaining pharmacy with the continuation of a needle exchange and intention to provide an emergency contraception service. The remaining pharmacy is also a Healthy Living Pharmacy and provides smoking cessation. The other four pharmacies within walking distance of the remaining pharmacy also provide smoking cessation and emergency hormonal contraception services.
- 2.5 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 500m apart along Blatchington Road and Goldstone Villas. There are also four other pharmacies within walking distance from Trinity pharmacy. Trinity Pharmacy is also on the same site as Trinity GP Practice which had a registered list size of 23,103 in December 2018.
- 2.6. In terms of loss of access due to changes in opening hours, there will be a loss of 5 hours per week because Trinity pharmacy is not open at lunchtimes. Although this should be mitigated by its proximity to Boots in George Street which is open at lunch time, the Board would like Trinity pharmacy to commence opening during lunchtime hours.
- 2.7. The most recent Supplementary Statement published by BHCC <http://www.bhconnected.org.uk/content/needs-assessments> (February 2019) to reflect changes in opening hours in the city since June 2018, shows an overall reduction of 31½ per week in pharmacy opening hours, mainly as a result of the previous pharmacy consolidation as five pharmacies have increased their hours.
- 2.8. The PNA steering group will continue to monitor the impact on the capacity of all pharmacies in the city regarding workload.

### **3. Important considerations and implications**

#### Legal:

- 3.1 As referred to in the report, the Regulations 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 HWB 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: 01/03/19

#### Finance:

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

Finance Officer consulted: David Ellis

Date 01/03/19

#### 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.
- 3.3.1 An Equalities Impact Assessment has been completed as part of the Supplementary Statement process and is included as Appendix 1. The equalities issues identified include that there will be an improvement in disability access, with the provision of an accessible toilet at Trinity Pharmacy. The provision of emergency contraception will also improve provision for women and young people. If the waits for dispensing is increased this may have a detrimental impact on older people.

Equalities Officer consulted: Anna Spragg

Date: 05/03/19

### **Supporting documents and information**

Appendix 1: Pharmacy consolidation Equality Impact Assessment Blake's into Trinity pharmacy

