

Title of meeting:	Health and Wellbeing Board
Date of meeting:	15 th February 2023
Subject:	Pharmaceutical Needs Assessment 2023 and wider pharmacy issues
Report by:	Matt Gummerson, Head of Strategic Intelligence and Research, Public Health Portsmouth
Wards affected:	All
Key decision:	Yes/No
Full Council decision:	Yes/No

1. Purpose of report

- 1.1 The Health and Wellbeing Board (HWB) has a statutory responsibility to publish a statement of the needs for pharmaceutical services of the population in its area, referred to as a Pharmaceutical Needs Assessment (PNA). The current PNA was published in October 2022 and stated that further losses of pharmacy provision in the city were likely to create a gap. A consolidation application approved by NHS England (NHSE) in November 2022 has resulted in the closure of the Rowlands Pharmacy at 24 Elm Grove, Southsea, PO5 1JG, and consolidation onto the site at 30 Osborne Road, Southsea, PO5 3LT. This paper therefore proposes that the PNA approve a revised PNA for consultation that identifies a gap.
- 1.2 The NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013 were amended from 1st October 2022 so that HWBs will have 30 days to submit representations on consolidation applications rather than the previous 45 days. Portsmouth's PNA makes clear that, in most circumstances, the HWB will indicate that granting a consolidation would create a gap. This report therefore proposes a more streamlined local process for agreeing that response.

2. Recommendations

- 2.1 The HWB is asked to:
 - 2.1.1 Approve the proposed changes in section 4 that will form part of revised PNA 2023.
 - 2.1.2 Agree that the draft PNA can be signed off for consultation by the joint-chairs of the HWB by 1st March 2023.
 - 2.1.3 Agree that the HWB response to future consolidation applications can be approved by the joint-chairs of the HWB as part of a revised process set out in section 6

3 Background

- 3.1 The PNA is a report on the local needs for pharmaceutical services. It is used to identify gaps in current services or improvements that could be made to current or future service provision. The PNA needs to be seen within the wider context of the role of community pharmacies in supporting the vision and priorities of the Integrated Care System (ICS). This will be discussed in more detail following a presentation at the HWB about the Integrated Care Board's (ICB) plans for a new Community Pharmacy Strategy for Hampshire and the Isle of Wight. This will cover a range of issues that are wider than the scope of the PNA, including:
- the changing balance between in-person collection of prescriptions vs online options, and the risks this potentially creates around the other vital roles pharmacies play in accessing advice and guidance and purchasing Pharmacy Only Medicines
 - the workforce and funding pressures facing the pharmacy system
 - how local partners can work together to mitigate these risks and challenges including to health inequalities.
- 3.2 The specific content of the PNA is set out in schedule 1 of the NHS (Pharmaceutical & Local Pharmaceutical Services) Regulations 2013. Portsmouth published its most recent PNA on 1st October 2022.
- 3.3 The Portsmouth PNA 2022 stated that the HWB consider the location, number, distribution and choice of pharmaceutical services serving the Portsmouth residents to meet the needs of the population. However, it also made clear that "*further reductions in provision of services would require an updated assessment of the needs of the local population*". On 24th October 2022 the HWB was notified that a consolidation application resulting in the closure of the Rowlands Pharmacy at 24 Elm Grove, Southsea, PO5 1JG, and consolidation onto the site at 30 Osborne Road, Southsea, PO5 3LT had been granted. In line with the 2022 HWB, this creates a gap which necessitates producing an updated assessment of the pharmaceutical needs for Portsmouth.
- 3.4 While the HWB response to the consolidation application in July 2022 did not identify a gap, this was assessed against the previous (2018) PNA that applied at the time. A gap can therefore only now be identified by issuing a new PNA, which requires a 60 day consultation with a range of specified organisations. This report therefore asks the HWB to approve the production of a revised draft PNA for consultation, as summarised in section 4 below. The population health analysis that forms the bulk of the PNA has not been updated since the last PNA was agreed so this will not change. Neither will the overall conclusions i.e. that:
- a) with the exception of gaps created by the additional closures (Elm Grove, Drayton Community Pharmacy, Sainsbury's Lloyds Farington), coverage is sufficient based on current levels of provision.
 - b) the HWB would not support any further consolidation requests unless there were obvious advantages in terms of operational robustness (workforce etc) that clearly outweigh any loss of service / coverage.

3.5 As the PNA now makes clear that further closures would create a gap, in future this can just be addressed by issuing a supplementary statement, rather than a revised PNA. These supplementary statements would still be brought to the HWB for information. Their effect would be to allow another pharmacy to apply to open in place of the closing pharmacy, if that consolidation application was refused by NHSE in line with the HWB's recommendation.

4 Proposed Portsmouth PNA 2023-2026

4.1 The majority of the analysis that makes up the PNA published on 1st October remains unchanged. The following sections will be updated to reflect the loss of three community pharmacies since that date:

- Section 4 - description of services available in each locality
- Section 6 - access to NHS pharmaceutical services
- Section 11 - gaps in provision

4.2 Gaps in provision will be clearly identified as set out below, with further detail in Appendix 1.

4.2.1 **The closure of the Rowlands Pharmacy at 24 Elm Grove, Southsea, PO5 1JG, and consolidation onto the site at 30 Osborne Road, Southsea, PO5 3LT, creates a geographical gap in the community served by the previous site on Elm Grove.** The HWB is satisfied that there is a current need for a pharmacy with disabled access, on or within 100m to the north or south of Kings Road or Elm Grove (Southsea, PO5). The pharmacy would be required to be open between 10:00 - 19:00 Monday to Friday, providing the following services:

- all essential services
- the community pharmacist consultation service
- the new medicine service
- hypertension case finding service
- supervised consumption service
- Hepatitis C Testing Service
- Smoking Cessation Service, and
- flu vaccinations

4.2.2 **The closure of the Lloyds Pharmacy at Fitzherbert Road, Farlington, PO6 1RR, creates a geographical gap in the community served by the previous site.** The closure of this site and that at 246b Havant Road, means there is only one pharmacy provider in the ward. The HWB is satisfied that there is a current need for a pharmacy with disabled access, in Drayton and Farlington ward. The pharmacy would be required to be open between 09:00 - 18:00 Monday to Saturday and 10:00 to 16:00 on Sunday, providing the following services:

- all essential services
- the community pharmacist consultation service
- the new medicine service
- hypertension case finding service
- supervised consumption service

- Hepatitis C Testing Service
- Smoking Cessation Service, and
- flu vaccinations

4.2.3 The closure of Drayton Community Pharmacy at 246b Havant Road, Drayton, PO6 1PA on 15th February 2023 creates a gap for a pharmacy offering the 'out of hours' services (as provided by a 100 hours pharmacy) operating in the area which could be met by a new pharmacy or by an existing provider increasing their hours. The HWB is satisfied that there is a current need for a pharmacy that is open as a minimum between 17:00 and 22:00 seven days per week with disabled access, in the northern locality of Portsmouth to the east of the A3, providing the following services:

- all essential services,
- the community pharmacist consultation service,
- smoking cessation service,
- the new medicine service, and
- flu vaccinations

4.3 As well as identifying the gaps created by the recent closures, the conclusion will reiterate the point made in the 2022 PNA that "*the Health and Wellbeing Board (HWB) would not wish to see reductions in the current availability of pharmaceutical services. Pharmacies are a crucial part of primary health services in the city*". On this basis, future closures of pharmacies will be considered to create a gap that another provider offering similar services could fill.

5 Revised process for approving the HWB response to consolidation applications

5.1 In November 2017 the HWB agreed a procedure for how to meet its statutory duty to make a representation to NHSE on consolidation applications of community pharmacies in its area (i.e. where pharmacy businesses on two or more sites propose to consolidate to a single existing site).

5.2 The procedure involved different approaches for applications considered by the HWB to be either contentious or non-contentious. In each case however the procedure involved consultation with HWB members and ward councillors impacted by the application. This would consider information provided in the application and, where useful, spatial analysis undertaken by the PCC Public Health Intelligence team to support identification of gaps in pharmaceutical provision.

5.3 It was agreed in 2017 that this procedure would be reviewed following any change to the Regulations. From 1st October 2022 the Regulations were amended to reduce the time available to the HWB to submit its response from 45 days to 30 days from date of notification of an application. This would make meeting the previously agreed procedure challenging. Furthermore, the changes describe in section 3.5 makes this procedure unnecessary. Under the PNA published in October 2022, and reiterated in the proposed PNA 2023, almost all consolidation applications will be

opposed by the HWB. There may be exceptions where the impact on services to residents will be minimal e.g. if two pharmacies in very close proximity offering a similar range of services wished to consolidate.

5.4 With the new PNA making the HWB's response to future consolidation applications clear in advance, and the reduced timeframe making consultation with the wider board impractical in a meaningful sense, it is proposed that:

5.4.1 the HWB response to future consolidation applications can be approved by the HWB chairs following a recommendation by the Director of Public Health.

5.4.2 HWB members and ward councillors affected are informed of consolidation applications and the proposed HWB response at least 10 days before submission.

6 Reasons for recommendations

6.1 PNAs are relevant when deciding if new pharmacies are needed, in response to applications by businesses, including independent owners and large pharmacy companies. Applications are contested by applicants and existing NHS contractors and can be open to legal challenge if not handled properly. They also inform commissioning decisions by local commissioning bodies.

6.2 The content of PNAs is set out in Schedule 1 to the NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013. They must include:

- A statement of the pharmaceutical services provided that are necessary to meet needs in the area;
- A statement of the pharmaceutical services that have been identified by the HWB that are needed in the area, and are not provided (gaps in provision);
- A statement of the other services which are provided, which are not needed, but which have secured improvements or better access to pharmaceutical services in the area;
- A statement of the services that the HWB has identified as not being provided, but which would, if they were to be provided, secure improvements or better access to pharmaceutical services in the area;
- A statement of other NHS services provided by a local authority, the NHS Commissioning Board (NHS England), an Integrated Care Board (ICB) or an NHS Trust, which affect the needs for pharmaceutical services;
- An explanation of how the assessment has been carried out (including how the consultation was carried out); and
- A map of providers of pharmaceutical services.

6.3 There is a regulatory duty (NHS (Pharmaceutical & Local Pharmaceutical Services) Regulations 2013 No 349: Part 2: Reg 8) to have a 60 day consultation about the contents of the assessment it is making. It is proposed that this consultation will be undertaken from 1st March 2023, closing on Monday 1st May 2023.

5. Integrated impact assessment

5.1 An Integrated Impact Assessment was completed on the previous PNA and the findings remain applicable to this updated PNA.

6. Legal implications

6.1 There is a statutory duty requiring the Health and Wellbeing Board to undertake and publish this needs assessment under section 128A of the National Health Service Act 2006 and regulations made under that section, namely the National Health Service (Pharmaceutical & Local Pharmaceutical Services) Regulations 2013 ("the 2013 Regulations")

6.2 Regulations 3 to 9 and Schedule 1 of the 2013 Regulations set out the detailed requirements as to the content of needs assessments and the manner in which the assessment is to be made and published.

7. Director of Finance's comments

7.1 There are no direct financial implications arising from the recommendations within this report.

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Signed by:

Helen Atkinson, Director of Public Health

Appendices:

Appendix 1 - Draft updated section to PNA identifying a current gap

Background list of documents: Section 100D of the Local Government Act 1972

The following documents disclose facts or matters, which have been relied upon to a material extent by the author in preparing this report:

Title of document	Location
Pharmaceutical Needs Assessment 2022	https://www.portsmouth.gov.uk/wp-content/uploads/2022/03/portsmouth-pharmaceutical-draft-needs-assessment-2022-accessible.pdf

The recommendation(s) set out above were approved/ approved as amended/ deferred/ rejected by on

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Signed by:

Appendix 1 - Draft updated section to PNA identifying a current gap

Section 2.1 on p46 [Pharmaceutical needs assessments: Information pack for local authority health and \(publishing.service.gov.uk\)](#)

The regulations require Pharmaceutical Needs Assessments to include statements of the pharmaceutical services that the HWB has identified that are not provided within its area but which the board is satisfied:

- need to be provided in order to meet a current need

Such gaps could be for:

- a pharmacy providing a specified range of services

The regulations are silent as to how the health and wellbeing board identifies any gaps. It is suggested that there are three levels where gaps may exist. 1. geographical gaps in the location of premises – are premises in the right locations? Are there any current gaps in the spread of premises? 2. geographical gaps in the provision of services 3. gaps in the times at which, or days on which, services are provided

Portsmouth's 2022 PNA stated that "*further reductions in provision of services would require an updated assessment of the needs of the local population*". Below is the proposed text for the sections in our revised PNA in which we will identify gaps.

1. The closure of the Rowlands Pharmacy at 24 Elm Grove, Southsea, PO5 1JG, and consolidation onto the site at 30 Osborne Road, Southsea, PO5 3LT, creates a geographical gap in the community served by the previous site on Elm Grove.

An estimated additional 2,009 residents are no longer within a 5 minute walk of a pharmacy as a result of this closure. While the expectation is not that everyone will be within 5 minutes' walk of a pharmacy, there are large numbers of older residents in sheltered and retirement accommodation in the area for whom the distance to alternative provision is potentially too far and this does represent a reduction of provision of services geographically. In addition, the closed site was accessible to disabled people while the continuing site is not.

Kings Road / Elm Grove is a busy road with lots of footfall from people of all ages, including those who travel through the area to reach the city centre. It includes several substance misuse and homeless services. A pharmacy here can meet the needs of a wide range of communities beyond those living in close proximity. There is currently no supervised consumption service available in the evening in the south locality, which could be an additional barrier to getting people with supervised consumption needs back into work. Barriers to accessing support for this client group can lead to additional pressures on emergency healthcare services.

Taking into account the above information, the Health and Wellbeing Board is satisfied that there is a current need for a pharmacy with disabled access, on or within 100m to the north or south of Kings Road or Elm Grove (Southsea, PO5). The pharmacy would be

required to be open between 10:00 - 19:00 Monday to Friday, providing the following services:

- all essential services
- the community pharmacist consultation service
- the new medicine service
- hypertension case finding service
- supervised consumption service
- Hepatitis C Testing Service
- Smoking Cessation Service, and
- flu vaccinations

2. The closure of the Lloyds Pharmacy in Sainsburys at Fitzherbert Road, Farlington, PO6 1RR

The closure of the Lloyds Pharmacy at Fitzherbert Road, Farlington, PO6 1RR, creates a geographical gap in the community served by the previous site. The closure of this site and that at 246b Havant Road, means there is only one pharmacy provider in the ward. The 2022 PNA made clear that further reductions in pharmacy provision in the city would create gaps in coverage. The closure of the Lloyds pharmacy at Fitzherbert Road means the loss of a site with considerable footfall and easy access for a range of people due to its location in a large supermarket.

It results in an additional 1,838 residents no longer being within a 10 minute walk of a pharmacy. There are additional communities, including areas with high proportions of older residents and pockets of severe deprivation, who are outside of that 10 minute walk radius already and for whom this represents a further reduction in their ability to access pharmaceutical services. The vast majority of residents not within a 10 minute walk of a pharmacy, including as a result of these closures, are in the northern locality of Portsmouth.

Taking into account the above information, the Health and Wellbeing Board is satisfied that there is a current need for a pharmacy with disabled access, in Drayton and Farlington ward. The pharmacy would be required to be open between 09:00 - 18:00 Monday to Saturday and 10:00 to 16:00 on Sunday, providing the following services:

- all essential services
- the community pharmacist consultation service
- the new medicine service
- hypertension case finding service
- supervised consumption service
- Hepatitis C Testing Service
- Smoking Cessation Service, and
- flu vaccinations

3. The closure of Drayton Community Pharmacy at 246b Havant Road, Drayton, PO6 1PA on 15th February 2023 creates a gap for a pharmacy offering the 'out of hours' services (as provided by a 100 hours pharmacy) operating in the area which could be met by a new pharmacy or by an existing provider increasing their hours.

The PNA states that 100 hour pharmacies have given Portsmouth residents greater access to pharmaceutical services by extending opening hours both in the morning and late into the evening plus extended weekend coverage. These pharmacies meet an identified need for pharmaceutical services for both 'out of hours' dispensing services and for the general population who wish to seek professional help for health and lifestyle advice, treating minor ailments and conditions that may be managed by self-care.

The closure of one of the four 100 hour pharmacies will reduce the public's access to these services and potentially increase pressure on other parts of the primary of the care system. Closure of this site would mean there is only one pharmacy providing these extended hours in the northern part of the city and none at all on the eastern side of the city.

Taking into account the above information, the Health and Wellbeing Board is satisfied that there is a current need for a pharmacy that is open as a minimum between 17:00 and 22:00 seven days per week with disabled access, in the northern locality of Portsmouth to the east of the A3, providing the following services:

- all essential services,
- the community pharmacist consultation service,
- smoking cessation service,
- the new medicine service, and
- flu vaccinations

Figure 1. Map showing 10 minute walk times to Portsmouth pharmacies without the pharmacies at Elm Grove, Havant Road and Fitzherbert Road

