

My ref:

Your ref: CAS-114240-Q5G0Q9

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Dear Mr Speight

Consolidation onto the site at 64 St Marys Street, Ely, Cambridgeshire, CB7 4EY of Advanced Pharmacy already at that site and St Marys Pharmacy currently at 50 St Marys Street, Ely, Cambridgeshire, CB7 4EY.

Thank you for consulting the Cambridgeshire Health and Wellbeing Board on the above application; this is a response on behalf of the Cambridgeshire Health and Wellbeing Board.

The Cambridgeshire Health and Wellbeing Board is required to:

"...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.

Current Cambridgeshire Pharmaceutical Needs Assessment 2017.

The current Cambridgeshire Pharmaceutical Needs Assessment (PNA), published July 2017, states that:

Current provision of local pharmaceutical services

Key finding: There is currently sufficient pharmaceutical service provision across Cambridgeshire. No need for additional pharmaceutical service providers was identified in this PNA.

Cambridgeshire has one pharmaceutical service provider per 4,258 people, equivalent to 23 pharmaceutical service providers per 100,000 resident population in Cambridgeshire. This is the same as the national average of 23 per 100,000 resident population and slightly lower than the East of England average of 24 pharmaceutical providers per 100,000 resident population.

Estimates of the average number of people per pharmaceutical service provider across Cambridgeshire have remained relatively stable since 2011.

As of July 2016 there were:

- 110 pharmacies in Cambridgeshire (only slightly more than 109 in July 2013 and 101 in January 2011).*
- 43 dispensing GP practices in Cambridgeshire (unchanged from July 2013 and January 2011).*
- One Dispensing Appliance Contractor (unchanged since 2011).*

Taking into account current information from stakeholders including community pharmacies and dispensing GP practices, the number and distribution of pharmaceutical service provision in Cambridgeshire is sufficient. The distribution of pharmacies and dispensing GP practices appears to cover the county well with few gaps and some concentrations. Some geographical gaps appear to exist in some of the less populated areas in the north and southern fringes of the county but these localities are served by suppliers from outside the county. In terms of postal addresses, across all of Cambridgeshire, there are only 67 postal addresses registered as a residential property that are located more than 20 minutes away by car from a pharmacy or dispensing surgery.

Review of the locations, opening hours and access for people with disabilities, suggest there is adequate access to NHS pharmaceutical services in Cambridgeshire. There appears to be good coverage in terms of opening hours across the county. Overall, out of 110 community pharmacies, 45 (41%) are open after 6pm and 26 (24%) are open after 7pm on weekdays; 90 (82%) open on Saturdays; and 22 (20%) open on Sundays. The out of hours service, Hertfordshire Urgent Care is required to arrange for the provision of a full course of treatment, if clinically necessary, before a community pharmacy is open.

Home delivery services can help to provide medications to those who do not have access to a car or who are unable to use public transport. Of the pharmaceutical providers who completed the questionnaire, 89 pharmacies (95.7%) and 21 dispensing GP practices (61.8%) have some form of delivery service in operation, which is more than in 2013.

The proportion of providers reporting that they have wheelchair access to consultation facilities has increased since 2013 from 80.4% to 93% of community pharmacies and from 86.8% to 88.2% of dispensing GP practices.

All community pharmacy and GP dispensing practices who responded to the questionnaire considered local provision to be 'adequate' or better, with 39% of pharmacies and 56% of dispensing GP practices reporting provision as 'excellent' and 55% of pharmacies and 41% of dispensing GP practices as 'good'.

Cambridgeshire PNA Supplementary Statement 2020

A Supplementary Statement was issued by the Health and Wellbeing Board in July 2020 reaffirms the position of the 2017 PNA, it states: *The current Cambridgeshire PNA expires in July*

2020 and the Cambridgeshire PNA Steering group started the production of the next version of the PNA. The steering group had produced a draft 2020 PNA and had consulted with pharmaceutical services as part of that process. The Draft PNA was due to be published for the 60 day statutory consultation in March 2020, in the light of Covid-19 the PNA steering group decided not to proceed with the public consultation and instead take the findings from the draft PNA and issue a Supplementary Statement reflecting the current position of pharmaceutical services in Cambridgeshire.

In addition the Department for Health and Social Security announced: “The Pharmaceutical Needs Assessments (PNA) are due to be renewed and published by Local Authority Health and Wellbeing Boards in April 2021, however due to current pressures across all sectors in response to the COVID-19 pandemic, the requirement to publish renewed PNA’s will be suspended until April 2022. Local Authority Health and Well Being Boards will retain the ability to issue supplementary statements to respond to local changes and pharmaceutical needs during this time. The NHS Pharmaceutical and Local Pharmaceutical Services Regulations 2013 will be updated in due course.”

The supplementary statement therefore is an updated picture of pharmaceutical needs in Cambridgeshire, but still should be read in conjunction with the 2017 PNA.

The position at the July 2020 Supplementary Statement is that a review of numbers of community pharmacies from NHS Digital data¹ and dispensing general practices from NHS England data² shows that the total number of pharmaceutical service providers (community pharmacies and dispensing general practices combined) per 100,000 resident population in Cambridgeshire remained unchanged from the time of the 2017 Cambridgeshire County Council PNA, within which provision was deemed adequate. It concludes that: *Several large-scale housing developments are in progress in Cambridgeshire and have been considered when assessing the need for local pharmaceutical services. **The level of growth has not resulted in any need for additional pharmaceutical services.***

A review undertaken in January 2022 for this application of the numbers of community pharmacies from data provided by the Cambridgeshire & Peterborough Local Pharmaceutical Committee and dispensing general practices from Cambridgeshire & Peterborough Clinical Commissioning Group data shows that the total number of pharmaceutical service providers (community pharmacies and dispensing general practices combined) per 100,000 resident population in Cambridgeshire has reduced, from 23 to 22, compared to provision at the time of the 2017 Cambridgeshire PNA.

¹ Source <https://digital.nhs.uk/data-and-information/publications/statistical/general-pharmaceutical-services/in-2008-09---2018-19-ns>

² <https://www.england.nhs.uk/mids-east/our-work/pharm-info/>

Time of Review of Cambridgeshire Pharmaceutical Provision	Community Pharmacies	Dispensing General Practices	Total Pharmaceutical Providers	ONS Mid-Year Population	Pharmaceutical Service Providers per 100,000 Resident Population
January 2017	110	43	153	651,940 (mid-year 2016)	23
January 2020	108	40	148	651,428 (mid-year 2018)	23
January 2022	106	40	146	657, 204 (mid-year 2020)	22

Cambridgeshire now (January 2022) has one pharmaceutical service provider per 4,501, compared to 1 per 4,402 residents at January 2020, and one per 4,261 residents at the time of the 2017 PNA.

A reduction of one community pharmacy, from 106 to 105, as a result of this consolidation application being approved would result in the rate of pharmaceutical service providers per 100,000 resident population in Cambridgeshire remaining at 22/100,000.

Distance & Travel Times

In terms of the proposed consolidation of the pharmacies to the one site at 64 St Marys Street, Ely it is important to consider access to any existing pharmacy provision and any resulting gaps in provision from the loss of one location.

The 2008 White Paper 'Pharmacy in England: Building on Strengths, Delivering the Future' states that it is a strength of the current system that community pharmacies are easily accessible and that 99% of the population – even those living in the most deprived areas – can get to a pharmacy within 20 minutes by car and 96% by walking or using public transport.

The maps in **Appendix 1(A-D)** were created using the Strategic Health Asset Planning and Evaluation (SHAPE)³ mapping tool and illustrate a travel times by cycling, walking, car and Public Transport, 20 minutes is recognised nationally as an acceptable journey time) from the closing and consolidated sites to identify any gaps in accessibility. The maps show that accessibility to pharmacy services in Ely by all modes of transport remain unaffected by the closure of the 50 St Marys Street site, the current pharmacy sites are only 50 meters apart with a journey time on foot between the two of a few minutes. Ely residents will still have access to a pharmacy within a journey time of 15 minutes by walking or 12 minutes by cycling, and all residents will have access to a pharmacy with 20 minutes by other modes of Transport.

³ <https://shapeatlas.net/>

There are 4 other pharmacies in Ely (3 within the city centre) as shown in Appendix 2, the closest (Boots Pharmacy) is less than a ten minute walk from closing site

Opening times

The proposed opening times on the application form for the consolidated site leads to a reduction in opening hours as a result of the consolidation as the closing site is a 100 hours pharmacy.

The total opening times as stated on the application form are as follows:

Site 1 (64 St Marys Street Ely – Consolidated Site)		Site 2 (50 St Marys Street, Ely – Closing Site)	
Monday	09:00-19:00	Monday	12.00 – 18:30
Tuesday	09:00-18:00	Tuesday	12.00 – 18:30
Wednesday	09:00-19:00	Wednesday	12.00 – 18:30
Thursday	09:00-18:00	Thursday	12.00 – 18:30
Friday	09:00-18:00	Friday	12.00 – 18:30
Saturday	09:00-17:00	Saturday	09:00 – 16:30
Sunday	Closed	Sunday	Closed
	55 Hrs		100 Hrs

100 Hour Pharmacies

100 hour pharmacies are pharmacies which are contracted to open for at least 100 hours per week for the provision of pharmaceutical services).

The closing site is a 100 Hour pharmacy, and the proposed consolidated site is not proposing to continue the 100 hours service, therefore if the consolidation is approved it would lead to a loss of a 100 hour pharmacy in Ely, however, there are two remaining 100 Hour pharmacies (Tesco and Sainsbury's) Tesco is a 6-10 minute drive from the closing pharmacy and Sainsbury's is 5-6 minutes away by car. This is shown in Appendix 2.

Primary Care Network (PCN) Profile

Both pharmacies (closing site and consolidated site) are located in the "Ely North PCN), the PCN has the following characteristics (reported in the 2019 PCN Profile):

- There are almost 37,900 people registered with Ely North PCN, with higher proportions of the population aged under 18 years and over 65 years compared to the South Alliance, CCG and England. The population is estimated to increase by almost 25% between 2021 and 2036.
- The PCN has a higher proportion of White British ethnic group compared to the South Alliance, CCG and England.
- Relative deprivation is higher for the PCN compared to the South Alliance but lower than the CCG and England. Approximately 9% of children and 10.3% of older people live in poverty.
- Recorded obesity in adults is statistically significantly higher than the South Alliance.
- It is estimated that 15% of adults smoke, which is statistically significantly higher than the South Alliance.

- Estimates of people reporting long-term activity-limiting illness and being in Good or Very Good health are statistically worse than the averages for the South Alliance, which may be a reflection of the relatively older population.
- The PCN has statistically significantly high recorded prevalence of CHD, hypertension, stroke, asthma, COPD, diabetes and cancer compared to the South Alliance averages. This may relate to the relatively high older people population in the PCN.
- The PCN has statistically significantly higher rates of Children's early help cases than the South Alliance
- Overall adult social care rates are statistically significantly higher than the South Alliance
- The first outpatient attendances, elective admissions and emergency admission rates are statistically significantly higher than the South Alliance

Changes to Service Provision

There are no proposed changes to the dispensing of appliances and no change in advanced and enhanced services across the two sites the consolidated site already provides all the services currently provided at the closing site and continue to do so.

Premises Facilities (Access)

The consolidation removes a site which has limited car parking which is on street, to one closer to public parking, there is no change in access to car parking for existing users of the consolidated site (64 St Marys Street) and little change for current users of the closing site.

Housing Growth in Ely

There are concerns that the consolidated site may not be able to cope with the additional growth due to housing growth. Ely is an area for Housing growth identified in the East Cambridgeshire Local Plan and referenced in the current Pharmaceutical Needs Assessment. The consolidated site is not proposing any enlargement of space, the current waiting area, consulting room, storage and staff areas etc. will have to take on the existing clients from the closing site as well as any from the planned growth in Ely. The documents provided don't give an indication of current numbers of people served at the closing site and the expected extra demand that will transfer to the consolidated site.

There will be additional pressure on staff at the consolidated site to deliver vital public health services including flu vaccines, LFT distribution and pandemic delivery services at a time of high demand on these services, and an increasing reliance on community pharmacies generally. Therefore the Health and Wellbeing Board is concerned at the consolidation of demand on a pharmacy that does not propose to expand its capacity, serving a high growth area.

Summary and Conclusions

In summary:

- Cambridgeshire now (January 2022) has one pharmaceutical service provider per 4,501, compared to 1 per 4,402 residents as at January 2020, and one per 4,261 residents at the time of the 2017 PNA. A reduction of one community pharmacy as a result of this consolidation application, from 106 to 105, would result in the rate of pharmaceutical service providers per 100,000 resident population in Cambridgeshire remaining at 22/100,000.

- Accessibility to pharmacy services in Ely by all modes of transport remain relatively unaffected by the closure of the 50 St Marys Street site, the vast majority of Ely residents will still have access to a pharmacy within a journey time of 15 minutes by walking or 12 minutes by cycling, and all residents will have access to a pharmacy with 20 minutes by other modes of Transport.
- The proposed opening times for the consolidated site do lead to a reduction in opening hours compared to the current actual opening hours as the closing site is a 100 hours pharmacies, however there are two remaining 100 Hour pharmacies (Tesco and Sainsbury's). Tesco is a 6-10 minute drive from the closing pharmacy and Sainsbury's is 5-6 minutes away by car.
- There are no proposed changes to the dispensing of appliances and no change in advanced and enhanced services provided.
- The Health and Wellbeing Board is concerned that the consolidated site does not propose to expand its physical capacity, and therefore there may be additional pressures resulting from increased use of the consolidated site from former customers of the closing site, in addition Ely is a high growth area.

Therefore in conclusion, it is the opinion of the Cambridgeshire Health and Wellbeing Board that the proposed removal of premises from the pharmaceutical list (the consolidation of the 50 St Marys Street site and 64 St Marys Street site) 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, but is concerned that the consolidated site may not be large enough to cope with the pressures put on it by the consolidation and transfer of clients and the anticipated growth in Ely.

Yours sincerely

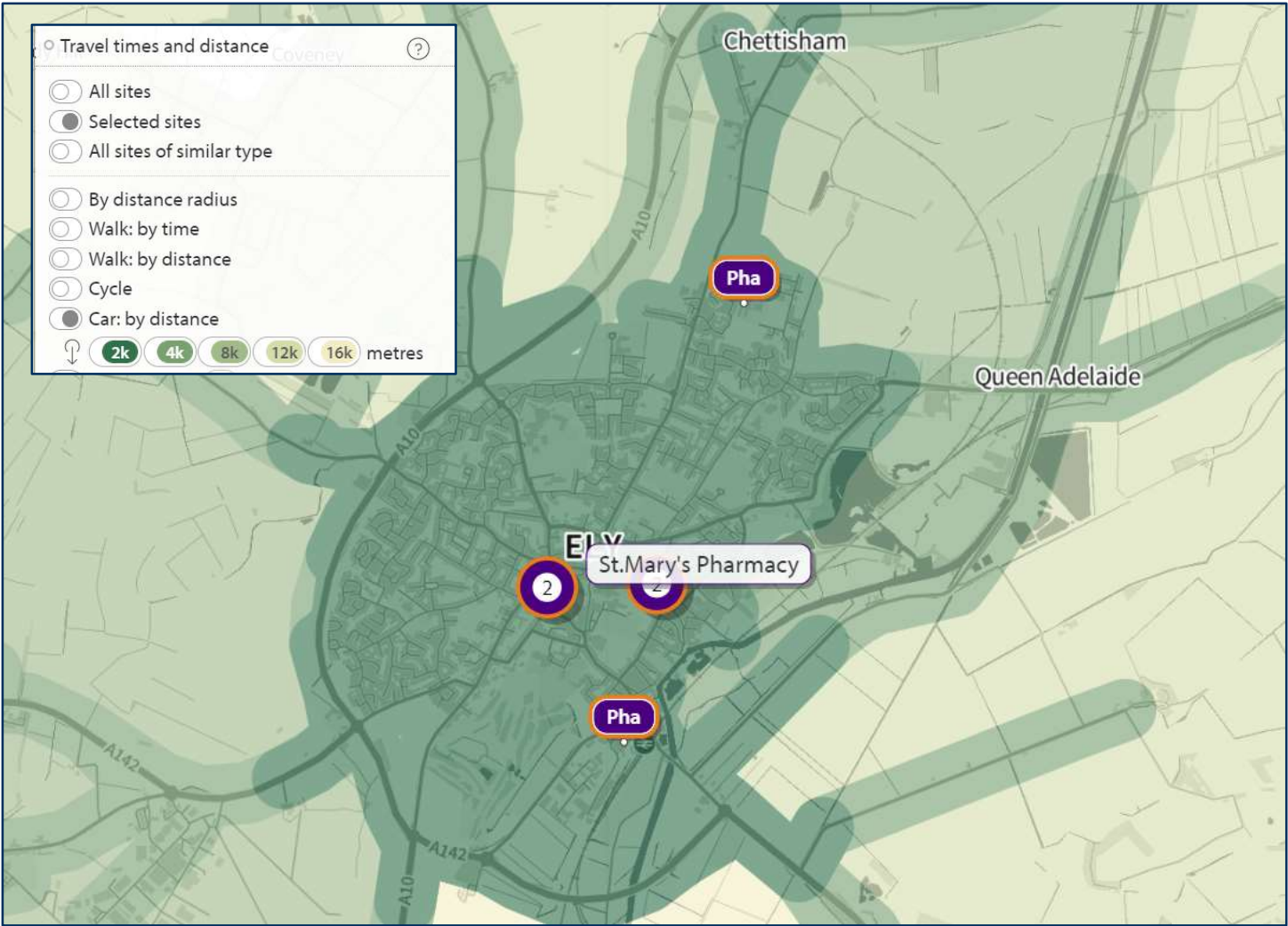


Iain Green
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For and on behalf of the Cambridgeshire Health and Wellbeing Board

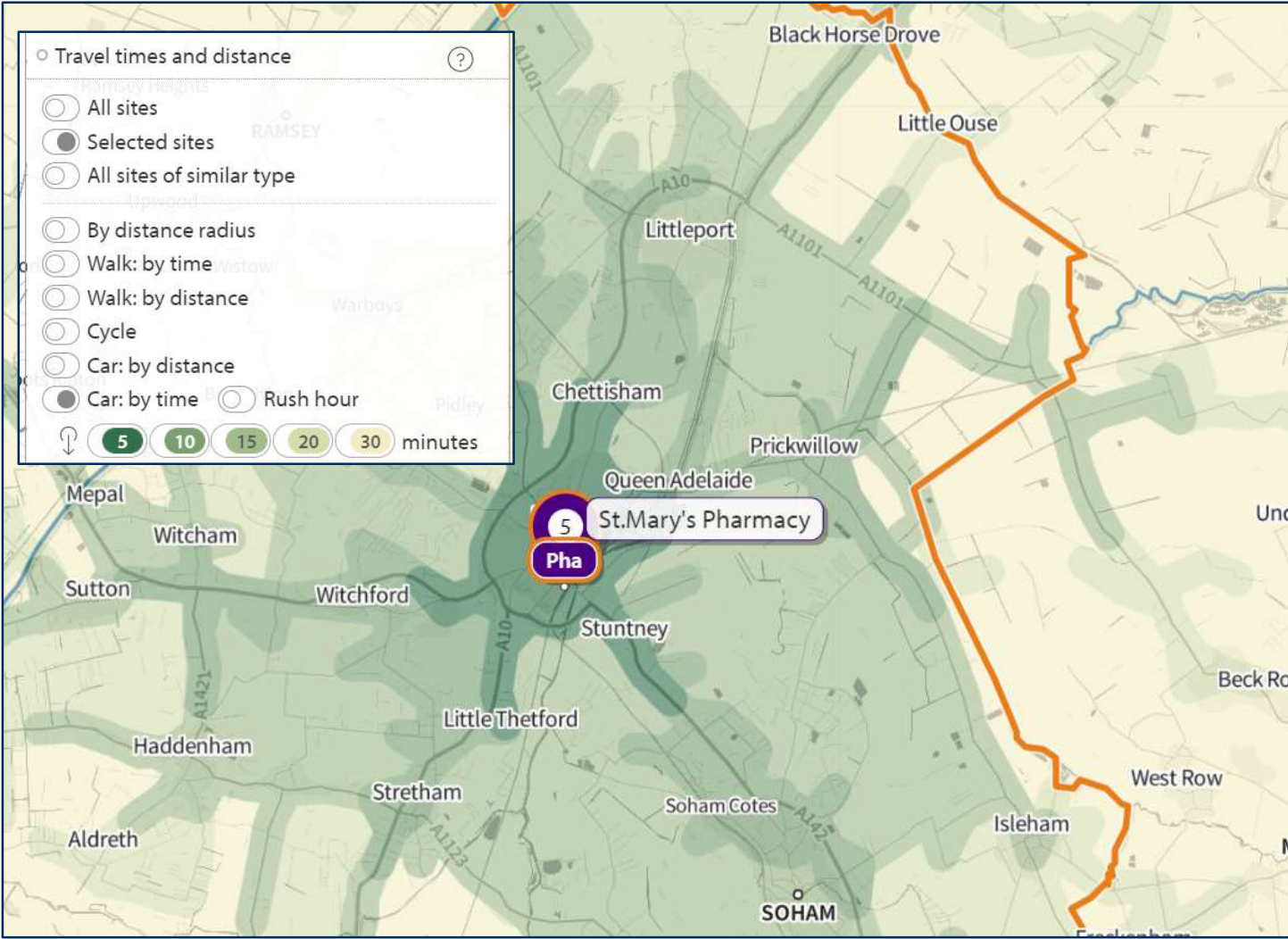
Appendix 1A – Travel Time by Walking



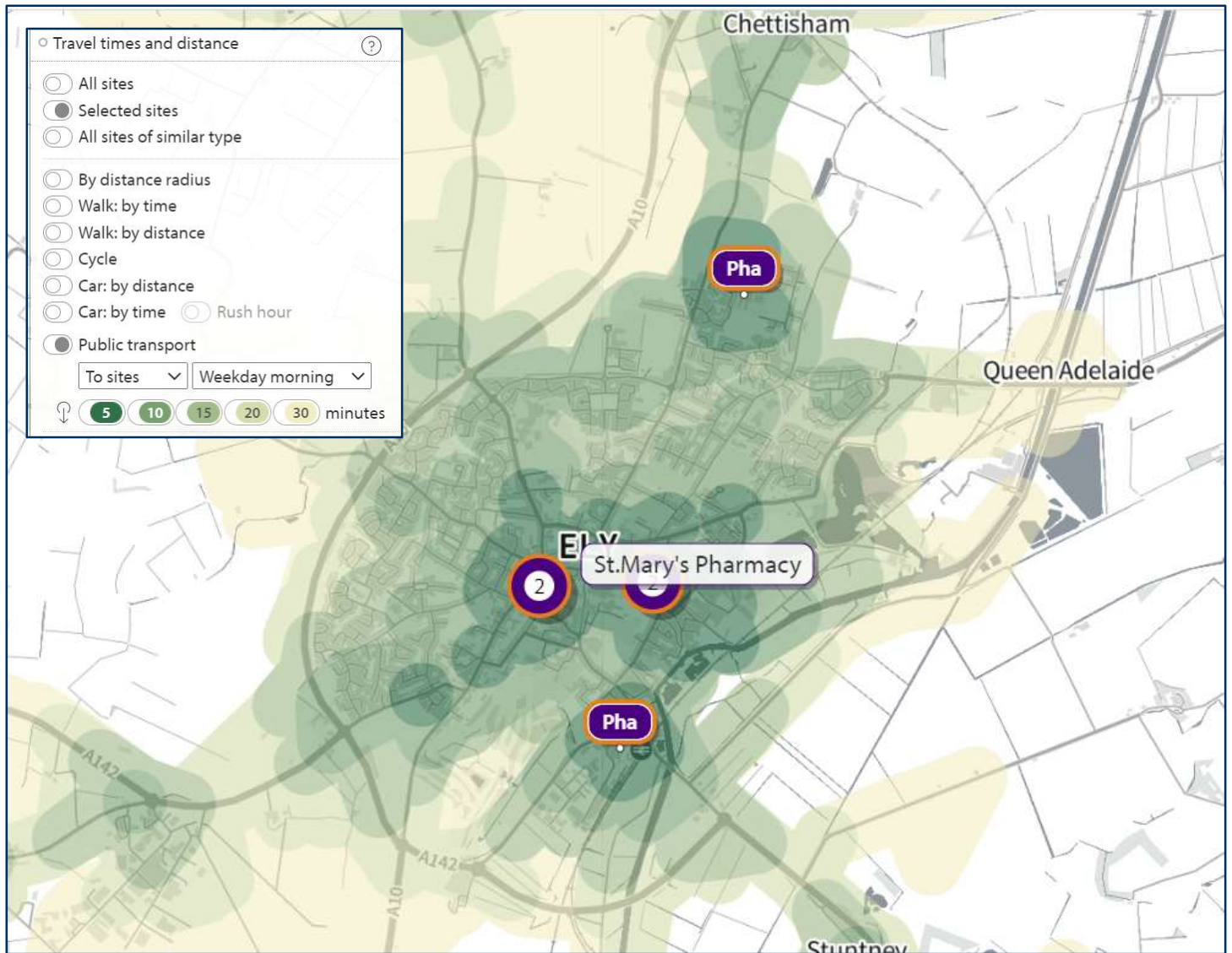
Appendix 1B – Travel Time by Cycling



Appendix 1C – Travel Time by Car



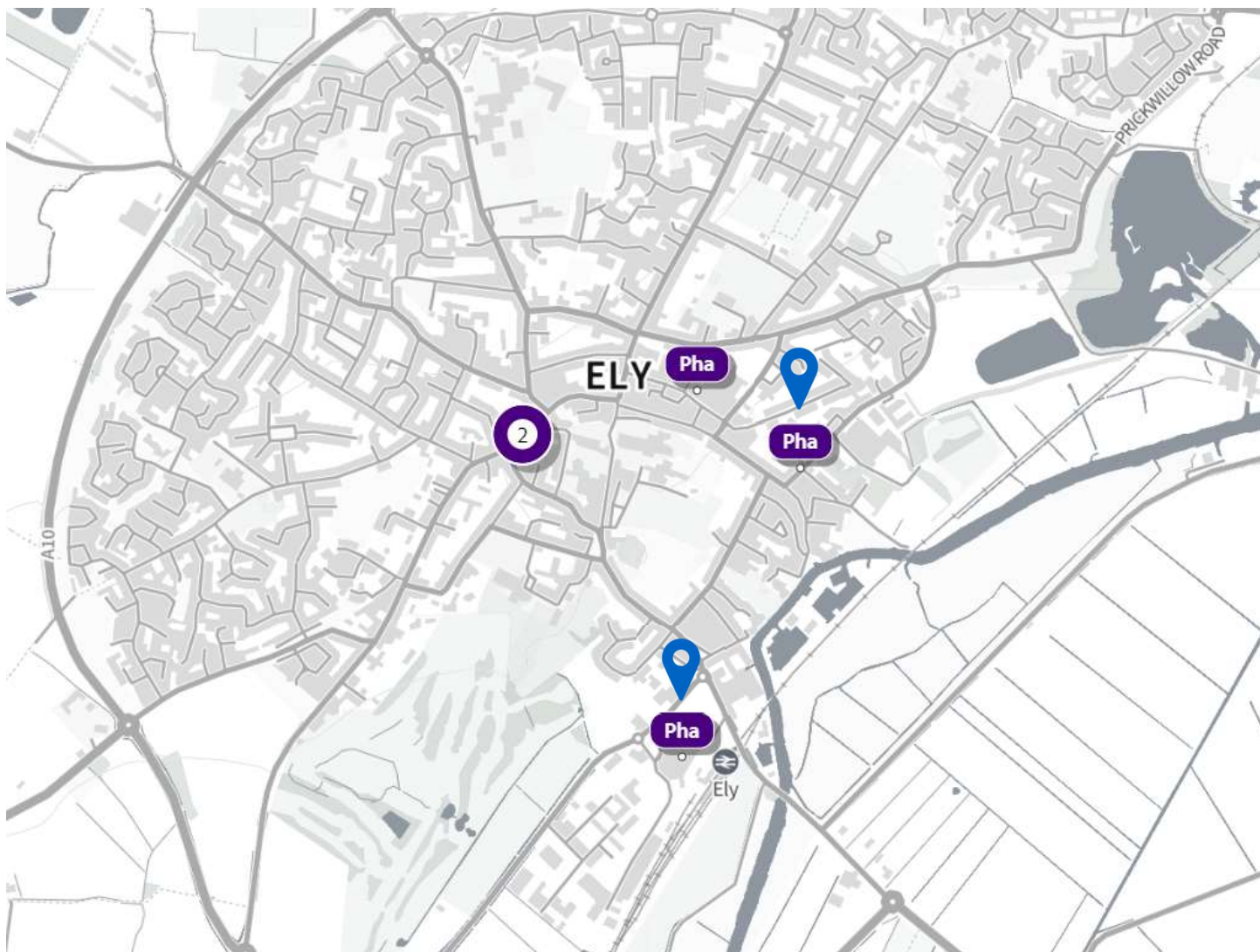
Appendix 1D – Travel Time by Public Transport



Appendix 2 –Closing and Consolidated sites



Appendix 3 – 100 Hours Pharmacies



100 Hours Pharmacy