

APPLICATION MOHAMMED AMEEN - BURNTISLAND

I would like to thank the Panel for allowing me to speak today

The Applicants reason for making this application seems to be that the Pharmaceutical Services provided by current Contractors is inadequate.

Can I firstly point out that since a previous Application was refused in 2016 on the 9th May 2018 Lloyds Pharmacy at a cost of £247,000 (almost a quarter of a million pounds) relocated to even better premises than those deemed adequate at the Previous Hearing

The Applicant may state that the population of Burntisland (6,669) has only one Pharmacy and this is higher than the Scottish Average , however there are examples of Towns that have a ratio similar or indeed higher than that of Burntisland and provide an adequate service , , Linlithgow population 12,840 2 Pharmacies Dalgety Bay population 9,710 one Pharmacy.

During the Previous Hearing the Community Council Representative Mr Mac Donald had stated that the Lloyds premises were situated in a long narrow unit perhaps not fully suitable, at the conclusion of the previous Hearing Tom Arnott the Lloyds Pharmacy Area Manager approached Mr MacDonald and said that should he become aware of any issues in the future to contact himself or the Pharmacy Manager , at no time since then has any Area Manager or indeed the Pharmacy been approached , although hopefully the Community Council will have approved of the Investment Lloyds Pharmacy has made to further improve the service it provides to the Residents of Burntisland

Indeed during that Hearing and I quote Mr Arnott stated I am more than willing at anytime to meet with the Councillors to discuss any further improvements we can make no approach has ever been made

I would also point out that following feedback from the Community Council at a previous Hearing that Lloyds Pharmacy reviewed its Opening Hours , we no longer close at lunchtime and now open at 8.30 a.m. to align ourselves with the GP Surgery Further evidence that Lloyds Pharmacy continues and will continue to take any actions necessary to provide an adequate service to the Community of Burntisland At the Previous Hearing it was stated that our premises were not adequate We have invested almost a quarter of a million pounds in relocating our premises to futureproof them to allow us to provide a more than adequate service to the residents of Burntisland .

The Panel will also be aware that right next door to Lloyds Pharmacy Dears Pharmacy has opened , and although neither ourselves nor indeed the Health Board wanted this facility, it is still able to take in prescriptions and dispense them off site and return them to Patients. In effect there are now 2 Pharmacies able to dispense prescriptions .

I am sure the Panel will agree that any issues that the Applicant has raised about Lloyds service levels , are negated by the opening of Dears Pharmacy being able to dispense prescriptions

I would also point out that since the last PPC the Pharmacy in Aberdour has increased its Opening Hours and indeed the Applicants proposed Opening Hours simply mirror those currently in place.

The Panel will have noted that the vast majority of the New Housing that the applicant refers to, is private housing many of which are large 3 and 4 Bedroom properties I feel it is also fair to say that the vast majority of the residents of these properties do not work in Burntisland , and so on a daily basis they leave the neighbourhood and access all kinds of services at or near their place of work
Indeed there is no Secondary School in Burntisland and pupils travel to Kirkcaldy on a daily basis to attend Secondary School

Demographics taken from the Scottish Index of Multiple Deprivation show the residents of Burntisland to be generally affluent the vast majority in Good Health and with a more than adequate level of Access to Services including Pharmaceutical Services .

I agree that the population of Burntisland has grown, however it has only grown by 400 residents since 2011 at the same time Lloyds Pharmacy has moved to new premises and has increased the Staffing Levels and Indeed the Pharmacist Cover in the Pharmacy in order to meet the needs of the Residents of Burntisland

The Applicant in support of his application has carried out a Consultation Exercise

If it is part of the New regulations is that the Applicant “must establish the level of Public Support of the residents in the neighbourhood to which the application relates

“ **Then** the Applicant has either tried and failed to gain the support of the residents by not trying to access all residents or , as is the case in Burntisland there is little Public Support for this Application

From a Population of 6,669 the applicant received 451 Responses 6.7% of the population AND OF THOSE RESPONSES only 382 5.7% of the population in response to Question 2 Do you think there are any Gaps or Deficiencies in the existing level of Pharmaceutical Care said there were 5.7%

This Applicant has a history of obtaining high response rates to the Consultation Analysis Reports indeed at Townhill the response rate was 21.1% and in Pumpherstoun 21.0%

I am sure the Panel will agree that such a low response indicates that the vast majority of the residents of Burntisland see no need for another Pharmacy.

The reason for this is that Lloyds Pharmacy in Burntisland provides an adequate service to the residents of Burntisland

The Applicant has provided letters of support.

I have attended many Pharmacy Practice Committee and National Appeal Panel Hearings and at very few of these has there not been a letter of support from the Local Community Council.

I agree that the population of Burntisland has grown, but only by 400 residents since 2011 however at the same time Lloyds Pharmacy has moved to new premises and has increased the Staffing Levels and Indeed has recently benefitted from a further increase in Staffing Levels of 37.5 hours

Athas our Pharmacist is about to start his Independent Prescribing Course and is a great advocate for Pharmacy First, the Pharmacy has a full time Accredited Checking Technician

Lloyds Pharmacy in Burntisland is fully engaged in all Core Services including MCS (previously Chronic Medication Service) Pharmacy First

The Pharmacy was rated as Satisfactory on its most recent GPHC Inspection with no Action Points

The Pharmacy has a good relationship with the GP Surgery and the Practice Pharmacist

Lloyds Pharmacy offers a full collection and Delivery Service which is FREE Although this is not a Core Service IT IS STILL AVAILABLE

The Panel must take account as to whether the granting of an Application would adversely impact on the security and sustainable provision of existing NHS primary medical and pharmaceutical services in the area concerned.

The following is taken from the NHS (PHARMACEUTICAL SERVICES) (SCOTLAND) REGULATIONS AS AMENDED)

Should the panel deem the existing service inadequate but also consider the applicants business not likely to be viable , and therefore not securing adequate provision of pharmaceutical services , the Application should be refused

The following is also taken from the NHS (PHARMACEUTICAL SERVICES) (SCOTLAND) REGULATIONS AS AMENDED)

The viability of existing service providers is also relevant in this context

If granting the application would affect viability of those who currently provide a service in the neighbourhood , then it may be that granting the application would have a negative effect upon services in the neighbourhood as a whole Such an application may be refused . Similarly , if the granting of an application would have a detrimental effect

upon the provision of services in the neighbourhood for some other reason , then refusal may be justifiable

I can assure the Panel that the granting of a Contract in Burntisland would have a seriously adverse effect on the future viability of Lloyds Pharmacy in Burntisland

WE HAVE SEEN NO PRESCRIPTION GROWTH IN THE 12 MONTHS TO 31ST MARCH 2022 HOWEVER IN THE SAME PERIOD WE HAVE SEEN PHARMACISTS COSTS INCREASE BY £35,666 I am sure the Panel will **agree this is a significant cost increase**

In all Areas of Scotland Community Pharmacies are struggling to find Pharmacists and granting an unnecessary Contract would only exacerbate the current shortage

The Applicant provides a list of services he will provide

All the services that are available are already adequately provided by Lloyds Pharmacy

The Pharmaceutical Care Services Plan in NHS Fife makes no mention of the need for a further Pharmacy in Burntisland and actually states

“It would appear that overall there are no identified gaps in the provision of Pharmaceutical Services in NHS Fife and it is important to continue to support development of Community Pharmacy Services through Staff Training and ensuring a robust infrastructure for continued delivery of Pharmaceutical Services that meet the needs of the population”

In addition the report has not identified unmet need for new Community Pharmacies across Fife

As stated Lloyds Pharmacy have increased , and will continue to increase Staffing Levels and Pharmacist Cover as necessary to ensure it continues to meet the needs of the residents of Burntisland , as well as reviewing Opening Hours if there is a need .

Lloyds Pharmacy has invested £247,000 in relocating to better premises , Pharmacists Costs have increased significantly and there is no reason to think that in the current climate these costs will reduce

I would ask the Panel to base their decision on the current service provision not any historical or perceived issues

I can assure the Panel that the granting of a Contract in Burntisland would have a seriously adverse effect on the future viability of Lloyds Pharmacy in Burntisland

The Panel must take account as to whether the granting of an Application would adversely impact on the security and sustainable provision of existing NHS primary medical and pharmaceutical services in the area concerned.

The Local Area Pharmaceutical Committee do not support the Application as it is not NECESSARY as there were no identified Gaps in the current Pharmaceutical Service available in Burntisland

I am unaware of any complaints to the Health Board regarding the current service

I would therefore ask the Panel to refuse this application as it is neither necessary nor desirable in order to secure the adequate provision of Pharmaceutical Services in the neighbourhood in which the premises are located