

Bruntisland Application – 26<sup>th</sup> May 2022

Morning everyone

I would like to thank you for allowing me the time to present my objection to this application today.

In order to grant an application, it is clear that we must consider the legal test and determine whether the current provision is adequate. We must consider the current provision within the neighbourhood and from those without the neighbourhood.

We, Omnicare Pharmacy currently provide a pharmaceutical service to our own neighbourhood Aberdour as well as outlying areas such as Burntisland and Dalgety bay. We provide all contracted pharmaceutical services, with opening hour of 9am to 5.30pm Monday to Friday and Saturday 9am to 12.30pm.

This has not always been the case, until we bought the pharmacy in 2017 the opening hours were half of what they are now. The pharmacy only opened half days and in our opinion wasn't offering a full pharmaceutical service. The delivery service was limited albeit the community enjoyed visiting the pharmacy and was only utilised by those housebound patients in Aberdour, Burntisland and Dalgetty Bay.

In terms of providing a pharmaceutical service to the neighbourhood of Burntisland, we collect prescriptions from the surgery in Burntisland daily and delivery medication daily as well as in emergency situations later in the day. Our driver works full time and not only delivers to Aberdour and Burntisland but Dalgety as well. While this is not a contracted service it helps many patients who are housebound and cannot reach any pharmacy close to where they live.

Our prescription number have grown over the last 5 years not dramatically, but as a result of our increased opening hours and more residents of Aberdour using our services instead of having to go to Dalgety bay or Burntisland. We also service a couple of care homes in the area.

Do we do many prescriptions for the residents of Burntisland, very few. Have numbers of prescriptions dispensed by us from Burntisland or even Dalgetty bay grown over the last 5 years, not dramatically.

So where do people from Burntisland access pharmacy services, Lloyds Pharmacy, in the heart of their high street. Lloyds provide all core contracted services, full opening hours 6 days per week along with a delivery service.

Since our increased opening in 2017, Lloyds have also enhanced their service by moving into a large purpose built premise. I am sure Tony representing Lloyds will be able to give you further details, however having a close relationship with the surgery in Burntisland there has been no discussion with them regarding patients either having poor access to pharmacy services or any inadequacies in pharmacy service.

All of these changes have come about since the previous application decision in 2008 to refuse the application on the grounds that the then existing pharmaceutical service was adequate. They noted then access to pharmaceutical services is readily available on foot, by public transport or by car and the panel did not find the availability of parking spaces to be an issue.

In the application in 2016 the PPC found existing services to be inadequate, however the application was neither necessary or desirable to secure adequate provision.

So what do we know that since those decisions

- Opening hours have increased
- The pharmacy premise in the neighbourhood has been dramatically enhanced
- There has been no significant change in population to put pressure on existing services.

Out with pharmacy services what has changed dramatically to affect access to pharmaceutical services.

The population of Burntisland hasn't grown significantly, at the point of the previous application in 2016 the population was stated at 6,500. It is now around 6,600.

Dalgetty bay has a population of around 10,000 with one pharmacy servicing that neighbourhood.

Obviously, demographics can play a part in those that require more access to healthcare service, however equally there are more people within Burntisland that don't require as much pharmacy intervention. Working families will also travel outside the neighbourhood to access pharmacy services. Including parents with children in secondary education, who travel daily to drop off and collect their children in Dalgetty Bay. They will also do their main shopping outwith Burntisland.

Around 70% of the population of Burntisland work and will travel to the likes of Edinburgh, Kirkcaldy, Glenrothes or Dunfermline for this purpose. There is every likelihood they will use pharmacy services in these areas.

The public consultation was carried out to obtain the level of support of the residents of Burntisland, of the population only 451 residents took part. This represents 6.8% of the population.

Only 5.7% of the population of Burntisland said there were gaps/deficiencies and even less 5.2% said the services being proposed by Burntisland pharmacy were actually required. I am no statistician but that is by no means overwhelming support and clearly demonstrates the majority of the population feel the current service is adequate.

The APC clearly state in their correspondence

- Population is stagnant, something I have also concluded
- No plans for significant large scale housing proposals which would affect prescription volumes at surgeries and pharmacies
- They noted substantial investment in the current pharmacy
- Pharmaceutical care services document identifies no gaps/unmet need within the current network
- No material change since previous applications were rejected

## The legal test

So by definition, the legal test states the committee must consider whether the existing provision in the relevant neighbourhood is adequate.

In order to decide this, then you need to consider if the population of the defined neighbourhood has poor access to pharmacy services. The answer to this is no, there is a pharmacy in Burntisland and provides all core services in a large high street unit, purpose built for this exact purpose. Our pharmacy in Aberdour also provides access to services for those that work in the village or pass through for convenience. A prescription pick up point has also been created in Burntisland to allow residents to collect prescriptions at their convenience. Is this a full pharmacy service, no, however it does add to how people access their medication.

Within the neighbourhood of Burntisland is there an inadequacy in the existing pharmacy service. Again, the answer is no.

Is adequacy measured by how long patients need to wait on a prescription, no, pharmacies need time to accurately fulfil prescriptions. The applicant has clearly demonstrated through many local publications, Burntisland is a flourishing community, patients are probably more than happy to leave a prescription to be made up and go and enjoy the local shops and booming community.

During the pandemic there was huge pressure put upon pharmacy services, queues were common and still are. The profession has adapted and there is a huge benefit of having a large space within a pharmacy, Lloyds pharmacy is able to support this.

Does the applicant's premise have the space to provide this, NO. Will it force patients to queue outside, YES. Does it alleviate a potential inadequacy, NO it doesn't.

There has been no complaints from the local surgery over services, we haven't heard reports of frustrated customers coming into us complaining about accessing pharmacy services in Burntisland.

Many of the comments in the CAR are over convenience and this is not relevant and should not be considered.

Viability is a significant factor and is required to be taken into account. Granting this application would certainly have a negative impact on current service provision. Recruitment within community pharmacy is a huge issue across Scotland, we ourselves have been advertising for a pharmacist for our Leven branch for nearly a year. We have had no applicants. Creating an additional service in a neighbourhood where it's not required will put further pressure on service.

There is a reason the legal test is clear, it is to stop new contracts being approved in neighbourhoods where there is no need and there is adequate provision of services. This is an example of this exact situation.

The existing pharmacy provision to Burntisland from within and located out with is adequate and the application should therefore fail.

