APPENDIX C

Ref	Comment Received From	Comment	Steering Group Response
1	Community Pharmacy Lincolnshire, the Local Pharmaceutical Committee	q1- 3.1.1 Choice of community pharmacies: The paragraph and accompanying table adds nothing of value to discourse of the PNA. The inference of the inclusion of the paragraph is that choice of provider is related to the ratio of independent contractors to multiple providers, but that bears no factual relationship to choice as patients find it in any given location. A location with only one pharmacy contractor provides the same amount of choice no matter whether that provider is an independent contractor or a multiple, nor can such a crude metric describe the choice available across the continuum of the opening hours offered by pharmacy contractors across Lincolnshire. Appendix A: There remain discrepancies in the opening hours when compared with NHS Choices. The quality payments process has validated the data on NHS Choices and Community Pharmacy Lincolnshire strongly urge the PNA to adopt the data from NHS Choices, rather than the current mix of core and supplementary hours described. Corrections have been sent under separate cover by email.	Paragraph in section 3.1.1 has been updated within the PNA. Appendix A - hours updated and amended as per information received and available
Page 129	An elected member or employee of a local authority	q1- Inaccuracies exist within the assessment and data/appendices changes have taken place since it was formulated!	The PNA is an assessment in a moment of time. Data regarding services has been updated and is believed to be correct as of the 27th February 2018. The PNA will be kept under constant review and any relevant changes will be updated through supplementary statements.
Ğ	A member of the public	q1- The information has changed since this document was first compiled	Due to no specific detail of which information has changed it is difficult to respond. The PNA will be kept under constant review and any relevant changes will be updated through supplementary statements. No change has been made to the PNA
4	North Kesteven District Council	q1- From the information provided, gaps in provision of services appears to be minimal. On the whole, access to pharmaceutical services appears to be reasonable in North Kesteven. The maximum drive travel time is 30 minutes, and in most cases 20 minutes. North Kesteven has the benefit of three 100-hour pharmacies, five community pharmacies that open beyond 6pm Monday to Friday, and three that open on Sundays. However, this is assuming that patients are able to travel to point of collection, or are eligible/qualify for home delivery services. Consideration must be given to those who are less able and subsequently in need of additional support to reach pharmaceutical services.	Residents of lincolnshire do travel to access other services and most community pharmacies do offer delivery service for those who require it. Outside of this there are Distance Selling Pharmacies too. Consideration has been made for all groups. No change has been made to the PNA

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5	Response formulated at a meeting of the South Kesteven District Council Rural Overview and Scrutiny Committee, in conjunction with Members of the Communities and Wellbeing Overview and Scrutiny Committee	q1- Please note: The responses to this survey relate to provision in South Kesteven only and not wider Lincolnshire.	Noted
6	A healthcare or social care professional	q1- Quality report	Noted. Thank you for your feedback
7	An elected member or employee of a local authority: LCC & SKDC	q1- Good report. Low return to the original summer 2017 consultation	Noted
∞ Pag	An elected member or employee of a local authority: North Lincolnshire HWB	q1- I am responding on behalf of the North Lincolnshire Health & Wellbeing Board. We recognise that our respective residents will utilise pharmacy services that are most convenient to them, ignoring administrative boundaries. We are pleased to note there are no identified gaps in provision and would support the continuation provision of services utilised by our population.	Noted
Page 130	An elected member or employee of a local authority: Health Scrutiny Committee for Lincolnshire (Lincolnshire County Council)	q1- The Health Scrutiny Committee for Lincolnshire tends to agree that there are no gaps in service provision. The Committee would like to make reference to the extension of GP opening hours, as part of the national GP Forward View initiative, and how these extended hours would ideally be reflected in an extension of the opening hours of local pharmacies.	Consideration has been given to practices that provide extended access currently. The PNA will be kept under constant review and any relevant changes will be updated through supplementary statements. No change has been made to the PNA
10	An elected member or employee of a local authority: East Lindsey District Council	q1- East Lindsey experiences significant growth in population in the summer season, but increasingly year-round. The increase in numbers is mentioned in the PNA. However, there is concern that the levels of Saturday and Sunday pharmacy opening may not be sufficient. Whilst the consultation results show only a small percentage of people wanting to access services at weekends, by definition these are predominantly residents as tourists are unlikely to have completed the survey and their needs may therefore not have been addressed. ELDC is also keen to understand whether there need to be changes to pharmacy opening hours to align these to changes in GP opening hours which are being extended. We would also like to be sure that where GP practices are merging and/or relocating (e.g. in Louth) that alignment with pharmacy locations and opening hours will be considered and reviewed.	Pharmacy has demonstrated that it will adjust to market/seasonal demand. Where NHS England recognises pharmacy does not meet the demand they have mechanisms to address this. Regarding GP practices merging - NHS England and CCG work together on merges and pharmacies are consulted along with any other stakeholders. No change has been made to the PNA
11	A healthcare or social care professional	q1- Pharmacists now refusing to request medication from surgeries causing a lot of disruption for patients + surgeries.	Noted - your feedback will be provided to local commissioners and the LPC. This is outside of the scope of the PNA and therefore no change has been made to the PNA

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12	A member of the public	q2- I understand the reasons but it seems to be going back a few steps	Due to no specific detail it is difficult to respond. The PNA will be kept under constant review and any relevant changes will be updated through supplementary statements. No change has been made to the PNA
13	North Kesteven District Council	q2- Having considered the information that has been provided in the assessment, it is fair to say that the conclusions are reasonable.	Noted
14	Response formulated at a meeting of the South Kesteven District Council Rural Overview and Scrutiny Committee, in conjunction with Members of the Communities and Wellbeing Overview and Scrutiny Committee	q2- The conclusions appear to be aimed at saving money. Data in the report suggests that by 2021 (the end of the life of this PNA) the population of South Kesteven will have increased by 5.8% (higher than the England average), aligned to this our population is ageing. These factors place additional demands on pharmaceutical services as more people will use the services and as people live longer these demands often become more frequent.	The PNA will be kept under constant review and any relevant changes will be updated through supplementary statements. No change has been made to the PNA
15	A healthcare or social care professional	q2- The only 2 conclusions - which do not say there are no gaps are ruled out by being outside its terms of reference - nonsense!	Noted
Page	An elected member or employee of a local authority: LCC & SKDC	q2- I read government funding is changing.	Funding is due to change however during the PNA no announcement was made which impacted on the service provision. No change has been made to the PNA.
Δ ⁷	An elected member or employee of a local authority: Health Scrutiny Committee for Lincolnshire (Lincolnshire County Council)	q2- The Health Scrutiny Committee for Lincolnshire tends to agree with the other conclusions contained within the draft PNA regarding the provision of pharmaceutical services in Lincolnshire.	Noted
18	Other'	q2- The cutbacks in the pharmaceutical budget means that any application from multiples (known high street pharmacy) must be looked at in great detail if at all. They are consolidating dispensing operation and in some areas, they are operating like an Internet Pharmacy contract and dispensing is done under spoke and hub model which pose a lot of potential risks in a rural area where the turn around for prescribing, dispensing and delivery may not reflect immediate medication change.	Noted.
19	An elected member or employee of a local authority	q3- Change to providers have already taken place. Inaccuracies exist in the service providers Appendix 1 Pt2	Noted. Appendix A has been updated with the information that was available.
20	A member of the public	q3- I can only comment on SKDC	Noted
21	North Kesteven District Council	q3- This question is difficult to answer without a more thorough understanding of pharmaceutical services in Lincolnshire, and would be better answered by service providers and clinicians.	Noted. All groups were invited to take part in the consultation

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22	Response formulated at a meeting of the South Kesteven District Council Rural Overview and Scrutiny Committee, in conjunction with Members of the Communities and Wellbeing Overview and Scrutiny Committee	q3- It is considered that at the time of publication the draft report very accurately reflected the services provided. However, some service provision has now changed, for example; the Dispensing Practice at The Little Surgery, 21 St Mary's Street, Stamford has now closed. It was also noted that Grantham and District Hospital has its urgent care services listed as a 'minor injury unit', but does in fact still have A&E provision. In view of the above, the draft PNA currently reflects that services 'moderately accurately' and should be reviewed before final publication.	We have received confirmation from NHS England regarding The Little Surgery and this has now been changed in Appendix B. We have not listed A+E services within the PNA as this is out of scope of the PNA
23	A healthcare or social care professional	q3- Appendix 1 part 3 New Springwells surgery - the pharmacy is not 7.7 miles but 9.5miles	The distance is confirmed from NHS Choices. No change has been made to the PNA
24	An elected member or employee of a local authority: Health Scrutiny Committee for Lincolnshire (Lincolnshire County Council)	q3- The Health Scrutiny Committee for Lincolnshire believes that moderately accurately reflects how pharmaceutical services are provided in Lincolnshire.	Noted
25 Page 26	An elected member or employee of a local authority	q4- Under provision compared overall to UK	Provision may be lower however the assessment concluded that service is sufficient and there are no gaps. No change has been made to the PNA
066 1327	North Kesteven District Council	q4- Again, this question is difficult to answer without a more thorough understanding of the needs of people in Lincolnshire, and would be better answered by patients and clinicians.	Noted. All groups were invited to take part in the consultation
27	Response formulated at a meeting of the South Kesteven District Council Rural Overview and Scrutiny Committee, in conjunction with Members of the Communities and Wellbeing Overview and Scrutiny Committee	q4- It is noted that a public survey was undertaken during the summer of 2017; however, only 1145 responses were received from across the county. This is just 0.15% of the GP registered population of Lincolnshire. In this respect it questioned whether this level of response adequately reflects the needs and opinions of the entire population. Much of the data used in the draft PNA is taken from the 2011 Census. While this may be the most current data available in some instances it is likely that some will now be out of date and not necessarily reflect current need. Since the publication of the consultation document it is noted that there have been changes to repeat prescription ordering in the South and South West CCG areas which includes South Kesteven. As a result, patients who use a pharmacy to order repeat medicines on their behalf will instead be asked to order repeat prescriptions directly from their GP practice. Whilst the aims of this are fully understood (to make prescribing safer, less wasteful and more cost efficient), there are concerns that this will create barriers, particularly for older and vulnerable residents and may lead to some not having their medication available when needed.	Noted. The number of responses is as we would expect for a county wide questionnaire. The following were taken into account when producing the PNA:When assessing the provision of necessary services in Lincolnshire and each of the seven PNA localities, Lincolnshire HWB has considered the following: The map showing the location of pharmacies within Lincolnshire in relation to localities and population density, indicating that pharmacies are generally located within areas of higher population density (Map A) The proportion of district population not born in UK; BME levels (Table 6) The location of community pharmacies in Lincolnshire and car journey travel time (Map B) The location of community pharmacies in Lincolnshire and surrounding areas and car journey travel time (Map C) The number, distribution and opening times of pharmacies within each of the seven PNA localities

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Page 133	An elected member or employee of a local authority: LCC & SKDC An elected member or employee of a local authority: Health Scrutiny Committee for Lincolnshire (Lincolnshire County Council)	q4- We are a rural county &I it is what it is. q4- The Health Scrutiny Committee for Lincolnshire believes that the draft PNA 'moderately accurately' reflects how pharmaceutical services are provided in Lincolnshire. The Committee is aware of that the scope of the Pharmaceutical Needs Assessment is limited to essential services provided by community pharmacists, and services such as the provision of advice to patients on minor ailments falls outside its scope. The Committee would like	 and across the whole of Lincolnshire (Appendix A) The choice of pharmacies covering each of the seven PNA localities and the whole of Lincolnshire (Appendix A) Location and opening hours of GP practices, including those providing extended opening hours (Appendix B) Results of the public questionnaire (Section 5) Proposed new housing developments (Table 14) Projected population growth (Figure 4, Table 2)The questionnaire is only one element of the assessment. Your concerns regarding repeat prescription ordering will be forwarded to local commissioners and the LPC as this is out of scope of the PNAThe most upto date has been used in all cases. Regarding your comment on repeat prescriptions this has been forwarded on to the CCG however is outside of scope of the PNA. No change has been made to the PNA. Noted Noted. Your feedback with be forwarded to local commissioners and LPC to note
		to emphasise the importance of advice provided by pharmacists on minor ailments, as a means of preventing pressure on GP surgeries and accident and emergency departments.	
30	An elected member or employee of a local authority: East Lindsey District Council	q4- As for question 1, there is a concern that whilst the consultation has been conducted with residents, the views and needs of tourists are unlikely to have been captured and may vary from those of residents, particularly in relation to Saturday and Sunday opening hours. Many tourists are unlikely to be registered with a GP and may draw more heavily on pharmacy services than residents. In addition, with national and local campaigns encouraging people to access pharmacy services rather than GP / A&E, they will only do this where there is both availability of staff and space for a private conversation. This needs to be reviewed to ensure that both are available especially at the busiest times.	Pharmacy has demonstrated that it will adjust to market/seasonal demand. Where NHS England recognises pharmacy does not meet the demand they have mechanisms to address this. No change has been made to the PNA.

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Page 134	An elected member or employee of a local authority	q5- There are many gaps, these need correction and further consideration	Without the details of where the gaps are it is difficult to respond. However when assessing the provision of necessary services in Lincolnshire and each of the seven PNA localities, Lincolnshire HWB has considered the following: The map showing the location of pharmacies within Lincolnshire in relation to localities and population density, indicating that pharmacies are generally located within areas of higher population density (Map A) The proportion of district population not born in UK; BME levels (Table 6) The location of community pharmacies in Lincolnshire and car journey travel time (Map B) The location of community pharmacies in Lincolnshire and surrounding areas and car journey travel time (Map C) The number, distribution and opening times of pharmacies within each of the seven PNA localities and across the whole of Lincolnshire (Appendix A) The choice of pharmacies covering each of the seven PNA localities and the whole of Lincolnshire (Appendix A) Location and opening hours of GP practices, including those providing extended opening hours (Appendix B) Results of the public questionnaire (Section 5) Proposed new housing developments (Table 14) Projected population growth (Figure 4, Table 2)The overall assessment has led to the conclusions in the report.
32	A member of the public	q5- Growth in populations and the way services are delivered. If pharmacies being asked to take on more roles	Noted

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33	North Kesteven District Council	q5- It is clearly important that the PNA models provision against growth projections as part of assessing adequacy. One case in point is Witham St Hughes which has been an area of growth in recent years but where provision of a pharmacy has lagged behind. The draft PNA appears to reflect future needs, and makes explicit reference to initiatives that could have an impact on the provision of services in the next three years. These include the relocation of secondary care based services, developing integrated pathways of care and out of hospital care initiatives. The PNA acknowledges predicted population growth from planned housing developments in particular, and the HWB will consider responses from the public, pharmacy contractors and other stakeholders involved in these developments as they progress during the three year time span of the PNA.	Noted
34 Page	Response formulated at a meeting of the South Kesteven District Council Rural Overview and Scrutiny Committee, in conjunction with Members of the Communities and Wellbeing Overview and Scrutiny Committee	q5- The significant housing growth planned in South Kesteven will have an impact on the future provision within the district. This is acknowledged in the draft PNA and it is welcomed that the HWB will monitor the development of major housing sites and produce supplementary statements where necessary. We would be pleased to work with the HWB to progress this where appropriate.	Noted
	An elected member or employee of a local authority: LCC & SKDC	q5- Funding and primary care changes can affect future services.	Noted
36 55	An elected member or employee of a local authority: North Lincolnshire HWB	q5- The pressure on our local hospitals to cope with rising demand and population means there is a need to keep pharmacy provision under review to ensure pressure is taken off secondary care provision where possible.	Noted
37	An elected member or employee of a local authority: Health Scrutiny Committee for Lincolnshire (Lincolnshire County Council)	q5- The Health Scrutiny Committee for Lincolnshire believes that the draft PNA 'moderately accurately' reflects the future pharmaceutical needs of the people in Lincolnshire. The Committee would like to reiterate its statement in response to question 4, emphasising the importance of advice provided by pharmacists on minor ailments, as a means of preventing pressure on GP surgeries and accident and emergency departments. The Committee has been assured that the development of the PNA reflects future housing developments.	Noted
38	An elected member or employee of a local authority: East Lindsey District Council	q5- ELDC accepts that some modelling has been done, but with data showing population, life expectancy and years lived in poor health all increasing, there is concern that there will be significant demands on pharmacy. This is particularly the concern where increases in dementia and similar conditions could mean staff needing to take more time with individual patients. Nationally there is media concern about demand on staff at Boots and the increasing risk of mistakes. The public need reassurance in relation to this.	The PNA will be kept under constant review and any relevant changes will be updated through supplementary statements. Second comment is outside of scope of the PNA. No change has been made to the PNA

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39	Other'	q5- The recent NHS England transformation plans focus on keeping the resources well within primary care, and using commercials pharmacies to provide services can mean profits are taken out of the local area.	Noted
40	An elected member or employee of a local authority	q6- Distance to travel / regular access to pharmacy - surgery / gaining appointments for review	Noted