

APPLICATION UMAR RAZZAQ

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 only because there are no Pharmacy Premises in his definition of the neighbourhood

There are, as the Panel is aware numerous examples from Pharmacy Practice Committee Hearings and numerous National Appeal Panel Hearings that adequate Pharmaceutical Services can be provided to a neighbourhood from Pharmacies situated out with that neighbourhood and this is the case in this in Windygates

Indeed the Panel will see from The Advice and Guidance for those Attending THE PHARMACY PRACTICES COMMITTEE they must consider WHAT ARE THE EXISTING PHARMACEUTICAL SERVICES IN THE NEIGHBOURHOOD OR IN ANY ADJOINING NEIGHBOURHOOD

I do not disagree with the Applicants definition of the neighbourhood however, I am sure that on their site visit the Panel found it difficult to determine where Kennoway ended and Windygates began. and vice versa

There are numerous Existing Pharmacies situated NEAR TO Windygates which the residents of Windygates (which is a Rural Village) currently utilise, the Lloyds Pharmacy in Kennoway is only 1.3 miles from the Applicants proposed site.

The residents also use the Pharmacies in Leven indeed There are 7 Pharmacies within 3 miles of the Applicants proposed Pharmacy.

The Applicants proposed opening hours include Full Day Opening on a Saturday and 6 hours on a Sunday, I note that Fife Health Board in their Pharmaceutical Care Services Plan indicate that the current provision of Pharmaceutical services on a Sunday is adequate to meet the needs of the residents of Fife.

The Pharmacist costs alone based on these hours would be £105,000 and staff costs of £74,000 as a minimum.

The Applicant has stated these opening hours simply to add some substance to his Application NOT because there is a need. And I would also question the viability of a Pharmacy opening for 59 hours per week at this location.

The Applicant could at any time reduce these hours to the minimum Health Board expectation of 9am to 5.30 pm Monday to Saturday and 4 hours on a Saturday.

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

On visiting the Applicants proposed site, I noted that the existing Post Office only opens from 9am to 3pm on a Monday and Thursday and only 9am to 1pm on a Tuesday Wednesday and Friday I assume this is because of a lack of demand

On my original visit for the previous PPC I also asked the Counter Assistant if she knew where the Pharmacy was to be sited she said they had only heard through rumour about a Pharmacy and had no detail, she very kindly phoned her Line Manager, who was also unsure of the situation, I found this surprising as any refitting of the premises which may affect the security of the Post Office would surely have had to be discussed with the Post Office, reading the Landlords letter to the Applicant (dated 25th October 2018) there is no mention of the existing Post Office, however on visiting the Post Office on the 2nd November I was informed that the Post Office is to remain open within the premises

I am sure that like myself the Panel must be wondering how a Pharmacy with a Consultation Room can be fitted into what is a small space

On visiting Windygates I could see no evidence of major housebuilding and therefore the population is likely to remain static for the foreseeable future indeed since 2011 the population has only increased by 10 people.

Information about Fife's Towns and Villages shows that Windygates has a population of 1,860 making it 38th of the 65 listed towns and villages in Fife and as stated the population has hardly increased since 2011 I would have to question the viability of a Pharmacy in Windygates

The Applicant may point out that Contracts have been granted in other parts of Fife with small populations.

There is however a major difference in the circumstances, for example Falkland Population 1,160. Falkland is a rural village. Falkland is also used by the residents of Strathmiglo Population 1,000 or the residents of Freuchie population 1,240 (a total of 3,400).

It is interesting to note that according to the latest Scottish Index of Multiple Deprivation the 3 Data zones that represent Windygates (SO 1009615 to SO1009617) residents of Windygates are ranked 4917, 3155 AND 4,794 this shows the neighbourhood to be fairly affluent and this is reflected in the Health Statistics that rank the 3 Datazones as 4225, 2758 and 4,137 of the 6,976 Data zones in Scotland

Windygates is NOT a deprived Area it is a Rural Village fairly affluent with a generally Healthy population

Situated at the Applicants proposed site are the Wok Inn ,a Keystone Convenience Store , a pub and Williamsons Electrical Contractors hardly the centre of a Community and proof that on a regular basis the residents of Windygates leave their neighbourhood to access services such as Banks Supermarkets GPs and other services including Pharmaceutical Services , and for many to attend their place of work and indeed there is higher than average Car Ownership (83%) this was also highlighted at a previous PPC

Indeed, in Kennoway there are the following businesses

A CO OP Foodstore , Beauty and the Beach , Tasty Treats , a Chinese Takeaway, Kings Taxi Office , Ramzan Curry House , Stuarts Bakers, a Premier Convenience Store and Post Office , Lorraine Hair Care , Keystone Convenience Store A Pizza Takeaway , the Little Friar Fish and Chip Shop , a Petrol Station Scotbet Bookmakers and The GP Surgery
I am sure the residents of Windygates are travelling outwith Windygates to use these facilities

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.

As stated at a previous Hearing the Lloyds Pharmacy in Kennoway could lose up to 30% of its prescriptions This could seriously impact on the long term viability of the LLOYDS Pharmacy in Kennoway

All existing Pharmacies offer all Core Services and the Lloyds Pharmacy in Kennoway is fully engaged with AMS , CMS now known as Medicine Case Review (currently 793 Live Patients) and Pharmacy First
Lloyds Pharmacy has no Capacity issues, as well as the Dispensary Team the Pharmacy can also utilise the Off-Site Assembly Facility, which ensures there will never be any Capacity issues
Although Collection and Delivery is not a Core Service this FREE service is offered by all existing Pharmacies, and if a Patient is genuinely housebound then a Pharmacy in Windygates would make no difference to their access to Pharmaceutical Services.

I would also point out that there has been no growth in prescription numbers over the previous 12 Months to March 2019 the time of the First Hearing and no prescription growth from then until now

CONVENIENCE IS NOT A REASON FOR GRANTING A PHARMACY CONTRACT.

And this Application is all about Convenience NOT NECESSITY

I note that Councillor David Alexander points out that many years ago there was a Pharmacy in Windygates however it closed, **I assume it was not viable**

The Area Pharmaceutical Committee do not support this Application and both they and Evelyn McPhail stated that the granting of this Application may exacerbate the current shortfall of Pharmacists and Pharmacy Technicians in NHS Fife a situation that is becoming much worse not just in Fife but throughout Scotland in fact in some Areas it could be described as being at crisis point

Evelyn McPhail also stated that there are no deficiencies / gaps in the provision of Pharmaceutical Services in Windygates identified in the Pharmaceutical Care Plan and points out that Pharmaceutical Services are currently being provided by other Pharmacies

Community Pharmacy Scotland have stated that the cost of a new Pharmacy Contract to the Health Board is between £30,000 and £50,000

The CAR Report shows that from a population of 6,470 (the combined population of Kennoway and Windygates) only 141 Responses were received 2.17% of residents I find it difficult to believe that all the responses only came from residents of Windygates (1,860) however even then the response rate is only 7.5% and of those only 116 in response **to Question 2**

Do you think there are any Gaps / Deficiencies in the Existing provision of Pharmaceutical Services in the neighbourhood replied positively 116 represents **only 1.8%** of the residents, or 6.2% hardly overwhelming support

In response to **Question 4**

Do you think the pharmaceutical services being proposed by Windygates Pharmacy are required within this neighbourhood only 102 respondents agreed with this statement

1.6% or 5.4%

The residents of Windygates on a regular basis travel outwith the neighbourhood to meet their daily needs and access services including Pharmacy Services

This Application is all about Convenience not Adequacy or need

CONVENIENCE IS NOT A REASON FOR GRANTING A PHARMACY CONTRACT

The Panel must consider WHAT ARE THE EXISTING PHARMACEUTICAL SERVICES IN THE NEIGHBOURHOOD OR IN ANY ADJOINING NEIGHBOURHOOD

Having examined the NHS Fife 2018/2019 Pharmaceutical Care Services Plan I can see no reference to there being a need for a Pharmacy in the Applicants proposed neighbourhood
This is the 2018 / 2019 Plan

I quote

There are 85 Contracted Community Pharmacies in Fife .These are well distributed across the Region and meet the access needs of the vast majority of the population with no large gaps identified In addition the Report has not identified unmet need for New Community Pharmacies across Fife , although the services delivered through existing Pharmacies may require ongoing scrutiny

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 the 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

As regards Sunday Opening (and I quote from the Fife Healthboard Pharmaceutical Care Services Plan)

There would appear to be NO UNDERPROVISION in terms of opening hours for NHS Fife For example the number of Pharmacies that open 7 days a week has now increased from 8 to 9

This Application is all about CONVENIENCE as current services are adequate

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 Lloyds Pharmacy in Kennoway could lose up to 30% of its prescriptions This could seriously impact on the long term viability of the LLOYDS Pharmacy in Kennoway

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

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