

Meeting:	Board Meeting
Purpose of Paper:	For Noting
Classification:	Board Official
Name of Reporting Committee:	Pharmacy Practice Committee
Date of Reporting Committee:	13 th November 2024
Committee Chairperson:	Mrs Margaret Kerr

Paper Title:

Application for Inclusion in the Board's Pharmaceutical List – CASE No: PPC/INCL01/2024
– Mr Ramis Qureshi, Unit 476, 32 Elmfoot Grove, G5 0LR

Recommendation:

That the Board note the decision taken at the recent meeting of the Pharmacy Practice Committee as set out below.

1.	Summary of Consultation Analysis Report (CAR)
1.1.	Introduction
1.2.	NHS Greater Glasgow & Clyde undertook a joint consultation exercise with Mr Ramis Qureshi regarding the application for a new pharmacy at Unit 476, 32 Elmfoot Grove, G5 0LR.
1.3.	The purpose of the consultation was to seek views of local people who may be affected by this or use the pharmacy at its proposed new location. The consultation also aimed to gauge local opinion on whether people felt access to pharmacy services in the area was adequate.
1.4.	Method of Engagement to Undertake Consultation
1.5.	The consultation was conducted by placing an advertisement in the Glasgow Times Newspaper as well as being posted on NHS Greater Glasgow & Clyde's Social Media Programme. Stakeholders were also notified by NHS Greater Glasgow & Clyde and the questionnaire was available on the Board website. Respondents could respond electronically or request a hard copy.
1.6.	The Consultation Period lasted for 90 working days through to 28 March 2024.

1.7.	Summary of Questions and Analysis of Responses
1.8.	Questions covered: the neighbourhood; location of the proposed pharmacy; opening times; services to be provided; perceived gaps/deficiencies in existing services; wider impact; impact on other NHS services and optional questions on respondents' addresses and circumstances.

Questions	Positive- Yes / %	Negative – No / %	Don't Know / %
1. Do you think the area in the above map describes the 'neighbourhood' to which this application relates?	124 / 93%	9 / 7%	
2. Do you live within the above neighbourhood?	130 / 97%	4 / 3%	
3. Do you believe existing pharmaceutical services provided in/to the defined neighbourhood are adequate?	59 / 45%	72 / 55%	
4. What do you think about the Intended Applicant's proposed opening hours?	Just Right	Too Short	Too Long
Monday – Friday 09:00 – 17:30	93	17	15
Saturday 09:00 – 13:00	97	15	16
Sunday - Closed	100	16	6
5. What are your views on the provision of the pharmaceutical services proposed by the Intended Applicant? – These responses were written.			
6. Do you think the Intended Applicant's proposed Pharmacy will impact (either negatively or positively) other NHS funded services like GPs, Community Nursing, other Pharmacies, Dentists, Optometrists and Social Services?	56 / 435	74 / 57%	
7. Do you believe you receive your medication in a timely manner using the existing pharmacy services provided in and to the defined neighbourhood?	67 / 52%	62 / 48%	
8. How did you become aware of this consultation?	Advert – Glasgow Times 5 / 4%	NHSGG&C Website 14 / 11%	Other 112 / 85%

1.9.	In total 134 responses were received. All submissions were made and received within the required timescale, thus all were included in the Consultation Analysis Report. All submissions were received electronically, with no request from The Applicant or members of the
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	public for questionnaires in paper, large font type or translated in other languages.
1.10.	Of the 134 responses, 127 were submitted by individuals and two were submitted from a group or organisation. Five respondents did not specify.
1.11.	The PPC considered the approach the Applicant took to increasing awareness of the public consultation. Given the active nature of the Applicant, the PPC noted that the volume of responses was not high compared with other applications the PPC has seen. Nor did this result in CAR responses showing an overwhelming support for a new pharmacy in the area.
1.12.	The PPC spent time considering the comments in addition to the headline responses. Within the comments they found a mixture of responses, some in support of a new pharmacy, but also a number that did not support the application. The PPC notes that many comments reflected convenience, rather inadequacy of existing services.
1.13.	The CAR also provided very mixed support for the range of services being proposed, there were many comments in respect of substance misuse services which was an area that the Applicant proposed that further surveys of the public would be required.
1.14.	The PPC discussed the inherent limitations that the CAR provides as evidence, but felt that the range of responses and the attempts made by the Applicant to engage with the area provided the PPC with helpful information for its decision making.
2.	Decision
2.1.	The Committee in considering the evidence submitted during the period of consultation, presented during the hearing and recalling observations from site visits, first had to decide the question of the neighbourhood in which the premises, to which the application related, were located.
2.2.	Neighbourhood
2.3.	Discussion
2.4.	The committee considered that the application had clearly defined what was commonly known as Oatlands. It has many natural and physical boundaries, including major roads, railways, the river, parkland and distinctive new housing.
2.5.	On visiting the area members noted how quiet the area was and this was compared with far more visible people walking around in the Crown St area.

2.6.	Considering a neighbourhood for all purposes, the Committee took account of the school within the boundary, but noted that many children would travel outside the boundary for education. Shopping was only available at a convenience store level, it was expected that for main shopping purposes, Farmfoods, Aldi and Co-op were all outside the proposed boundary and would most likely be the main grocery shopping choices.
2.7.	The committee noted that there is no GP practice in the proposed boundary, nor any existing pharmacies, but there are ten within 1.1 miles of the proposed site.
2.8.	The Committee felt that the housing stock within the boundary was consistent and certainly added to the community feel that Oatlands has created and helps to reinforce the identity of Oatlands in comparison to New Gorbals.
2.9.	The Committee also considered that the area has grown and is now much more established. There continues to be building activity, but many of the additional housing stock referred to by the Applicant are outside of the boundary as shown in the application.
2.10.	The Committee noted that Oatlands is clearly an area where lots of families live, but there was less clear evidence of it being a neighbourhood for all purposes. Many services are already provided outside of the proposed neighbourhood meaning that the population are likely to travel in and out of the neighbourhood as described on a regular, if not daily, basis.
2.11.	The Committee also discussed that the proposed neighbourhood is quite small, both in terms of the actual area and the population within it, particularly given a large area is parkland. Other than the park, all recreational activities are in the surrounding area.
2.12.	Taking all of these factors into account the PPC agreed that the neighbourhood should be expanded to the west and to the south.
2.13.	The south boundary was agreed as the M74 as this provides a very clear physical boundary, while including some of the areas that service the community in Oatlands (recreational and retail).
2.14.	To the West, the PPC agreed that the boundary should be the A730, going south to the A728 where it intersects with the M74 and going north onto Gorbals St to the river Clyde.
2.15.	The Committee defined the neighbourhood with boundaries as follows:
2.16.	North –the River Clyde

	<p>East – A728 extending in the same line directly toward the M74</p> <p>South – M74</p> <p>West – A730, going south to the A728 where it intersects with the M74 and A730 going north onto Gorbals St to the river Clyde</p>
2.17.	Adequacy of existing provision of pharmaceutical services and necessity or desirability
2.18.	Having reached a conclusion as to neighbourhood, the Committee was then required to consider the adequacy of pharmaceutical services to that neighbourhood and, if the Committee deemed them inadequate, whether the granting of the application was necessary or desirable in order to secure adequate provision of pharmaceutical services in the neighbourhood.
2.19.	The Committee noted the developments that The Applicant described as taking place in the area are over a long period of time. The Committee acknowledged that the population has changed both by new builds as well as some areas being demolished and decided there was no significant impact in terms of the neighbourhood.
2.20.	The Committee paid attention to comments in the CAR about waiting times, convenience and how services are accessed noting that the response rate was not very high but was still inclusive of good information. The Committee paid particular attention to written responses.
2.21.	The Committee discussed the viability of a new pharmacy considering the volume of patients that are expected and number of prescriptions. The PPC noted that the proposed neighbourhood's population was very low to sustain a new pharmacy and coupled with the mixed support from the public expressed in the CAR. There was limited evidence provided to suggest that the neighbourhood's population would increase materially in the short term to increase the volume of prescriptions generated from within the neighbourhood.
2.22.	The Committee considered The Applicant's reliance on his family, particularly during the first year of opening. While that is a commercial decision for the Applicant, many of the reasons for reliance on that support were in respect of non-contractual aspects of running a pharmacy, such as delivery, extended opening hours and dispensing innovation and therefore would not be taken into account in the PPC's decision making.
2.23.	The Committee considered anecdotal evidence and comments in the CAR made about convenience, noting that it did not provide much evidence for inadequacy and that the existing pharmacies in the

	neighbourhood are not struggling in terms of dispensing or providing other services supported that.
2.24.	The Committee considered IP availability, noting that it is not a contractual service and therefore wouldn't be an indicator of inadequacy though they recognise that it is the future of pharmacy.
2.25.	The Committee was mindful that determination of adequacy would be a question applied to the facts and evidence revealed and established, and its conclusion reached would be after exercising appropriate judgement. It gave careful consideration to the evidence it had received from the Applicant, the CAR responses, the Interested Parties, the community bodies, its PPC member visits to the site; and it heard expert advice from contractor and non-contractor pharmacist members of the panel about the issues identified in the hearing and their knowledge of equivalent service delivery matters elsewhere in Scotland.
2.26.	The PPC considered the complaints that the Applicant referred to and discussed the GPC inspection reports provided as well as considering how compliant within existing pharmacies are dealt with.
2.27.	The PPC also referred to the NHSGGC PCSP. It clarifies that where there may be any inadequacies identified, the Board should look to existing pharmacies in the area to address that inadequacy in the first instance. The PCSP does not identify any areas of inadequacy in the GGC area.
3.	Conclusion
3.1.	Following the withdrawal of the Contractor and Non-Contractor Pharmacists in accordance with the procedure on applications contained within Paragraph 6, Schedule 4 of the National Health Service (Pharmaceutical Services) (Scotland) Regulations 2009, as amended, The Committee concludes that existing provision of pharmaceutical services to the defined neighbourhood is adequate.
3.2.	The PPC considered the location of the proposed pharmacy, its size and proposed layout, and the services proposed in the application.
3.3.	Taking account of all the representations made, and the information revealed by the CAR and submitted orally and in writing the Committee determines that it is neither necessary nor desirable to approve the application by Ramis Qureshi for admission to the Pharmaceutical List.