Report on the consultation results for Wirral's Draft Pharmaceutical Needs Assessment 2025 – 2028

Wirral Health and Wellbeing Board and Wirral Council

September 2025

# Report on the consultation results for Wirral's Draft Pharmaceutical Needs Assessment 2025 – 2028

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Version Number	Date	Status	Actions
1.0	June 2025	Draft report	Report on results of public consultation for draft PNA 2025 - 2028
2.0	September 2025	Final report	Report on results of public consultation for draft PNA 2025 - 2028

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# Consultation on Draft Pharmaceutical Needs Assessment (PNA) 2025 - 2028

This section outlines the elements both required in the legislation and those steps taken to engage local residents and partners in the review of the draft PNA content.

# Legislation

#### **Regulatory Statements**

The National Health Service (NHS) Pharmaceutical and local Pharmaceutical services Regulations (2013) set out the legislative basis for developing and updating PNAs and can be found at: <a href="http://www.legislation.gov.uk/uksi/2013/349/contents/made">http://www.legislation.gov.uk/uksi/2013/349/contents/made</a>

Part 2: Regulation 8 sets out the mandatory consultation elements that must be adhered to when completing a new Pharmaceutical Needs Assessment.

#### Guidance

Pharmaceutical needs assessments: information pack
Produced in October 2021, and can be found at:
<a href="https://www.gov.uk/government/publications/pharmaceutical-needs-assessments-information-pack">https://www.gov.uk/government/publications/pharmaceutical-needs-assessments-information-pack</a>

#### **Consultation Groups**

There is a statutory requirement to consult on the draft PNA, for a minimum period of 60 days, prior to finalisation and publication by the local Health and Wellbeing Board. Regulations stipulate some mandated consultee groups.

#### Range of consultation groups and routes

# Pharmaceutical regulations state that the draft document must be distributed to:

- Cheshire and Merseyside Integrated Care Board (ICB) and Wirral Place Partnership (formerly Wirral Clinical Commissioning Groups (CCG)
- Community pharmacies
- Dispensing Doctors (if situated within Wirral boundary currently none)
- Healthwatch
- Local NHS trusts that include local Hospital Trusts, Mental Health Trusts and Community Health Service providers
- Local Pharmaceutical Committee (LPC)
- Local Pharmaceutical Services (LPS) (no current contracts for Wirral)
- Local Medical Committee (LMC)
- Local Pharmaceutical Network (LPN)
- Neighbouring Health and Wellbeing Boards
- NHS England (NHSE)

Locally, the draft PNA was also distributed to:

#### **Public Sector**

- GPs and other Primary Care staff
- · Adult Social Services
- Neighbouring Local Authorities
- · Public Health staff

#### **Patients and Public**

- Older People's Parliament
- Voluntary Sector Groups
- Community Sector Groups
- Faith Sector Groups

#### **Methods**

#### Formal consultation on the draft Pharmaceutical Needs Assessment (PNA) 2025-2028

This local consultation was conducted using a range of methods to reach residents, interested parties and mandated consultees, including:

- Press releases to range of local media including Wirral View
- Council Website
- Council Engagement contacts via email distribution
- Local Pharmaceutical Committee website and bulletin
- Existing contact lists for statutory consultees and partners
- Social media
- Local press
- Partner networks

The formal process began on Wednesday 9th April 2025 and closed on Sunday 15th June 2025 (68 days in total). The legislation allows for full documentation to be published online, and this was available via Wirral Council's 'Have Your Say' public engagement platform. This platform provided access to the online survey facility and draft PNA for review. This enabled residents and partners to review the PNA and then leave feedback on its content.

An Easy Read version of both the draft PNA and the PNA survey were also available on the Have Your Say platform.

In addition, hard copies of the PNA were made available at four library venues across the borough (aligned to former constituency boundaries). At the libraries, residents were able to review a paper version of the draft PNA and, if they wished, feedback via paper survey responses.

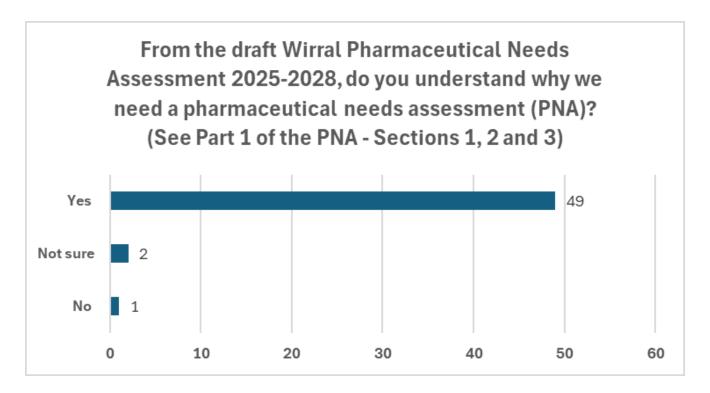
Finally, members of the public could request (via email or telephone) an Easy Read PNA with embedded survey or a paper version of the PNA survey, to be sent to them, with provision for paid return postage envelopes. (See <u>Results of Consultation</u>)

# **Results of consultation**

This section presents an overview of the results from the PNA consultation and highlights any changes that were made to the draft document on the basis of feedback received.

Fifty-two (52) responses were received, forty-six (46) via the online facility and six (6) via paper copies, and those combined results are outlined below.

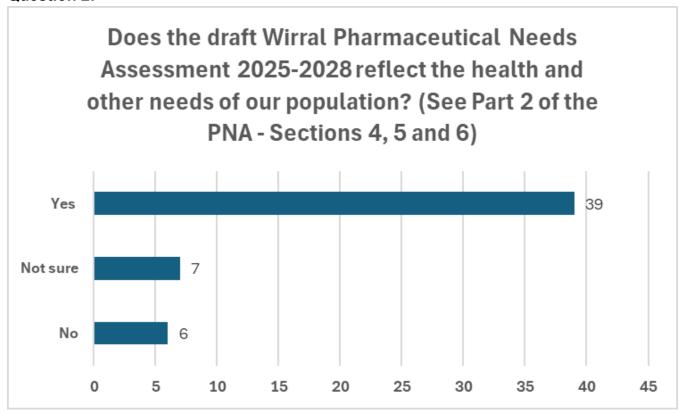
#### Question 1:



#### **Key findings from Question 1:**

- Of those who responded (n~52) to the consultation.
  - 94% (n~49) agreed that the need for a PNA was accurately reflected in the draft local Pharmaceutical Needs Assessment.
- Details of the comments received can be seen in <u>Summary Section</u> of this report.
- **Outcome**: The comments received did not result in any material changes to the draft Pharmaceutical Needs Assessment.

#### Question 2:

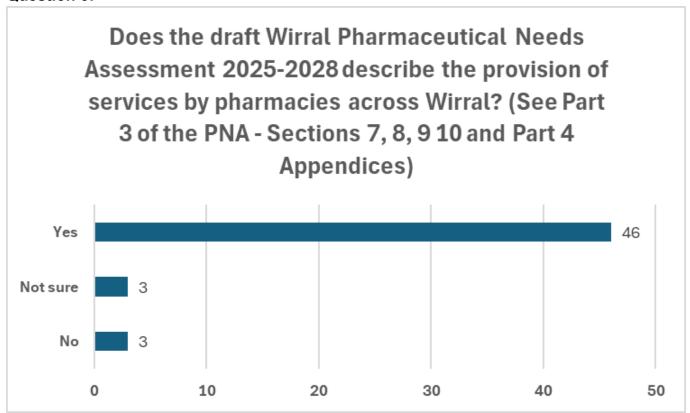


# **Key findings from Question 2:**

- Of those who responded (n~52) to consultation Question 2.

  - Some respondents were unsure (n~7 or 13.5%) and some suggested it did not reflect local health needs (n~6 or 11.5%).
- Details of the comments received can be seen in <u>Summary Section</u> of this report.
- Outcome: The comments received did not result in any material changes to the draft Pharmaceutical Needs Assessment.

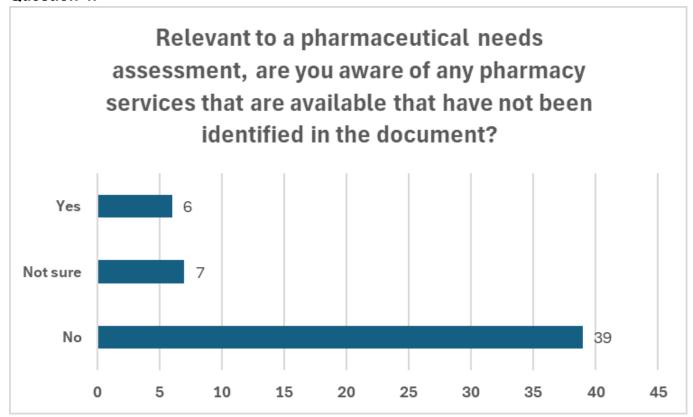
#### Question 3:



## **Key findings from Question 3:**

- Of those who responded (n~52) to consultation Question 3:
  - 88.5% (n~46) agreed that the draft PNA describe the types of services that are, and can be, provided across Wirral
- Details of the comments received can be seen in Summary Section of this report.
- Outcome: The comments received did not result in any material changes to the draft Pharmaceutical Needs Assessment.

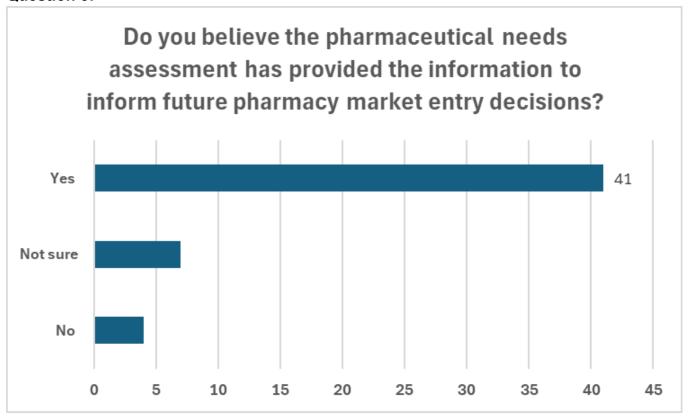
#### Question 4:



# **Key findings from Question 4:**

- Of those who responded (n~52) to consultation Question 4:
  - Just 11.5% (n~6 of 52) felt there were further pharmacy services that are available that had not been identified in the document in the draft Wirral Pharmaceutical Needs Assessment 2025-2028.
  - The majority, 75.0% (n~39) confirmed all services that could be included, were included.
  - With 13.5% (n~7) unsure if there anything else that needed to be added.
- Details of the comments received can be seen in <u>Summary Section</u> of this report.
- **Outcome**: The comments received did not result in any material changes to the draft Pharmaceutical Needs Assessment.

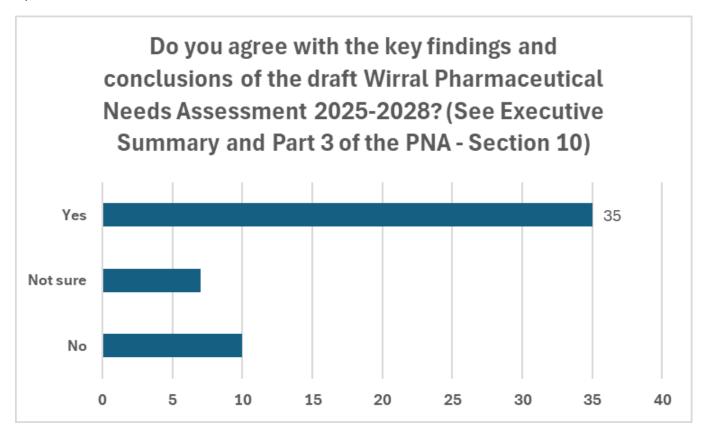
#### Question 5:



# **Key findings from Question 5:**

- Of those who responded (n~52) to consultation Question 5.
  - 78.8% (n~41) agreed the draft pharmaceutical needs assessment provided the information to inform future pharmacy market entry decisions
  - o Some respondents were unsure (n~5 or 13.5%) and felt the content did not inform future market entry requests (n~4, or (7.7%).
- Details of the comments received can be seen in Summary Section of this report.
- Outcome: The comments received did not result in any material changes to the draft Pharmaceutical Needs Assessment.

#### Question 6:



# **Key findings from Question 6:**

- Of those who responded (n~52) to consultation Question 6.
  - 67.3% (n~35) agreed with the key findings and conclusions of the draft Pharmaceutical Needs Assessment 2025-2028.
  - o Some respondents were unsure (n~7 or 13.5%) and
  - 10 did not agree with key findings and conclusions (19.2%).
- Details of the comments received can be seen in <u>Summary Section</u> of this report.
  - One instance of this lack of specificity has been identified in the draft PNA document and will be addressed in the final version (see Comment 6/Response 13/Letter (i)
- **Outcome**: The comments received did not result in any material changes to the draft Pharmaceutical Needs Assessment.

# Question 7: Do you have any further comments about the Wirral Pharmaceutical Needs Assessment (PNA) 2025-2028?

### **Key findings from Question 7:**

- Twenty Six (26) comments were received
- Details of the comments received can be seen in Summary Section of this report.
- Outcome: The comments received did not result in any material changes to the draft Pharmaceutical Needs Assessment.

# Question 8: For your pharmacy...Please can you review the information in the document and the Appendices for accuracy?

#### **Key findings from Question 8:**

- Two pharmacies provided information to address the presentation of their pharmacy details that were included the draft PNA
- Details of the comments received can be seen in <u>Summary Section</u> of this report.
- **Outcome**: This information will be updated and published in the final PNA in September/October 2025.

## **Conclusions**

Fifty-two (52) responses were received. Overall, the vast majority of responses were supportive of the content in the Wirral Pharmaceutical Needs Assessment (PNA) 2025-2028 and agreed with the conclusions and recommendations made.

A small number of comments were received where respondents indicated that they disagreed with content or conclusions made. All comments received are presented below (Results of Consultation), along with the response and any resulting action.

A number of respondents highlighted operational issues in relation to local pharmacy provision. Addressing operational issues is outside the scope of the PNA, but issues raised will be shared with the most appropriate partner, commissioner and/or contract manager for their consideration and potential action.

The content and conclusions in the draft PNA have not been materially changed following this consultation.

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# Results of Statutory Consultation

# Responses to Questions – qualitative answers

Q	Detail	Survey	Comment from	Response on behalf of Wirral Health and Wellbeing Board
1 F	From the draft	Response Not sure	consultation 1.0	Noted
	Nirral	Not suic	The document	Noted
	Pharmaceutical		is huge, and I	OUTCOME: No change to the draft PNA
	Needs		have visual	g :
Δ	Assessment		acuity issues	The PNA Development Group are aware that the PNA is a large and technical
	2025-2028, do			document, and efforts were made to keep the document as succinct as possible
_	ou understand			keep this complex document as short as possible whilst including all the statutory
	why we need a			content the legislation and guidance requires.
	oharmaceutical			An Facy Dood version was also produced
	needs assessment			An Easy Read version was also produced.
	PNA)? (See			
	Part 1 of the			
	PNA - Sections			
1	l, 2 and 3)			

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
1	From the draft Wirral Pharmaceutical Needs Assessment 2022-2025, do you understand why we need a pharmaceutical needs assessment (PNA)? (See Part 1)	No	2.0 Not very clear?	OUTCOME: No change to the draft PNA  The PNA Development Group recognise that the PNA is a large and technical document that must provide a comprehensive picture of need and provision to inform future commissioning decisions, enabling the best control of entry decisions to be made.  Efforts were made to ensure the document is as clear as possible whilst ensuring that all statutory content required is included. Guidance stipulates that findings and recommendations in the PNA must be clearly and precisely worded and address the key Regulatory Statements.  It is appreciated that some of this is very technical. An Easy Read version was produced to help address this and make content more accessible for members of the public and other lay readers.  Part 1 of the PNA (pages 1-25) provides a full and detailed account of the need for an assessment. Part 2 and 3 provides local context around the need of our residents, concluding with Part 4 summary of information in the main document. An Easy Read version is also provided.

Q?	Detail	Survey		Response on behalf of Wirral Health and Wellbeing Board
1	From the draft Wirral Pharmaceutical Needs Assessment 2022-2025, do you understand why we need a pharmaceutical needs assessment (PNA)? (See Part 1)	Not sur		OUTCOME: No change to the draft PNA  It is recognised that some residents may not feel consultation processes meet their needs in terms of feedback and outcomes. The PNA statutory consultation was undertaken following legislation and guidance. Local communications about the consultation were clear in relation to purpose and process.
2	Does the draft Wirral Pharmaceutical Needs Assessment 2025-2028 reflect the health and other needs of our population? (See Part 2 of the PNA - Sections 4, 5 and 6)		1.0 My pharmacy is not disability a	Noted  OUTCOME: No change to the draft PNA  Data in the draft PNA highlights the responses received in the Pharmacy Contract Survey in relation to accessibility.  This is an operational issue and outside the scope of the PNA. The respondent will be contacted and asked to share details of the pharmacy. This information will then be shared with Community Pharmacy Contract Lead for their consideration and response.
2			As a 78 year-old, I am very head walking 50 - 60 miles a week a any health medications. I am odiet. My generation is a very much of its avoidable if the NHS resourced coaching for health. One challed the social impact of having a hubble to one's peers	Noted  althy - and not on on a vegan najor it denge is nealthy

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
2		Not sure	3.0 Not very clear	OUTCOME: No change to the draft PNA  See answer to Question 1/Comment 2
2	Does the draft Wirral Pharmaceutical Needs Assessment 2025-2028 reflect the health and other needs of our population? (See Part 2 of the PNA - Sections 4, 5 and 6)	No	4.0 There is an increasing representation of older and younger people than the national average, although number of PNA ration is good it is not representative of the locations of the people in Wirral so does not address the needs in areas of high population	OUTCOME: No change to the draft PNA  Within Section 5, Population Profile, the PNA presents an overview of population demographics, population structure and information on a number of health and socio-economic factors that may impact on pharmaceutical need. The sections also include a number of maps to show any variation within Wirral. This provides a broad base to be able to assess local need.  The ratio of population-to-pharmacy is included at electoral ward level, and although this varies, there is coverage in all wards.
2		Not sure	5.0  Needs are not static. They are constantly changing. There should be provision for this in the planning.	OUTCOME: No change to the draft PNA  The PNA considers both at current and future population need. Taking account of prospective future housing/planning developments (Section 4.4). This is in-keeping with the national PNA guidance. The regeneration projects expected on Wirral remain under review as do increases in population and these, amongst other factors, will be considered within the lifetime of this PNA and future PNAs.  Also see answer to Question 6/Comment 11

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
2	Does the draft Wirral Pharmaceutical Needs Assessment 2025-2028 reflect the health and	Not sure	You ignore what people write so why should I bother writing anything	OUTCOME: No change to the draft PNA  See answer to Question 1/Comment 3
2	other needs of our population? (See Part 2 of the PNA - Sections 4, 5 and 6)	Not sure	<b>7.0</b> Future population planning	OUTCOME: No change to the draft PNA  See answer to Question 2/Comment 5
2		Not sure	8.0 Not sure this has been fully explained	OUTCOME: No change to the draft PNA  See answer to Question 1/Comment 2
2		Not sure	9.0 Some housing developments, such as the one at Wallasey docks may be underserved by locally available services, except for car owners. This needs to be considered along with the development of more brown field building schemes.	OUTCOME: No change to the draft PNA  See answer to Question 2/Comment 5  Also, see answer to Question 2/Comment 4

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
2	Does the draft Wirral Pharmaceutical Needs Assessment 2025-2028 reflect the health and other needs of our population? (See Part 2 of the PNA - Sections 4, 5 and 6)	No	10.0 2 chemists in West Kirby have closed and one has no Pharmacist	OUTCOME: No change to the draft PNA  At time of writing there were 5 community pharmacies in West Kirby. No notifications of closure have been received. Any confirmed changes in provision will be included in the final PNA.
2		No	11.0  We are pleased to see specific reference to the life outcomes of people with learning disabilities in section 5.5.3. The data and evidence are limited -especially in relation to change. We expect there to be more older people living with both physical and learning disabilities (as referenced) but also see increasing numbers of neurodiverse young people, which will impact on how pharmacy services are delivered.	OUTCOME: No change to the draft PNA See answer to Question 2/Comment 5

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
3	Does the draft Wirral Pharmaceutical Needs Assessment 2025-2028 describe the provision of	No	My pharmacy is not disability accessible	OUTCOME: No change to the draft PNA  See answer to Question 2/Comment 1
3	services by pharmacies across Wirral? (See Part 3 of the PNA - Sections 7, 8, 9 10 and Part 4	Not sure	2.0 Not very clear	OUTCOME: No change to the draft PNA  See answer to Question 1/Comment 2
3	Appendices)	No	There is a major gap in representation of PNA, outside office hours, the current provision does not meet the needs in high population areas to get to an out of hours pharmacy. this put enormous pressure on low income people to have to taxi to a PNA service outside of their area	OUTCOME: No change to the draft PNA  This PNA has identified a number of changes to opening times since the last PNA (2022-2025) was published.  The PNA concludes that there is a lack of essential pharmaceutical services within the borough at certain times: Monday to Saturday 9.00-10.00pm, and Sunday 4.00-10.00pm.
3		Not sure	4.0 You ignore what people write so why should I bother writing anything	OUTCOME: No change to the draft PNA  See answer to Question 1/Comment 3

Q?	Detail	Survey Response	Comment from consultation	Respor	nse on behalf of Wirral Health and Wellbeing Board
3	Does the draft Wirral Pharmaceutical Needs Assessment 2025-2028 describe the provision of services by pharmacies across Wirral? (See Part 3 of the PNA -	Not sure	As some pharmaceutical chemists have some medicines and medication and some do not have what you need, and you end up going back to chemist if not in the chemist you go to. Have them send text message when prescription is ready as some do and some do not. Have more information easy read booklets and have longer appointments.  6.0  The JSNA covers geographical and access issues in some detail but does not thoroughly outline accessibility from the service provision perspective.  We have seen considerable variation in pharmacy practice, in particular  1) The use of blister packs but some pharmacies do not dispense using blister packs and others charge for it. Whilst not dispensing via blister packs may save cost to pharmacy practice it creates greater risk in delivery (especially where people organize their own medicines (or lack capacity therefore a team or advocate does it for them) and passes cost 'down the line' as support organizations create policies and process to ensure safety. The medicine regime for people with complex disabilities can be complicated, and we believe that enhanced services should be available in such circumstances.  2) Access and communication -we see variation in practice around reasonable adjustments for people with learning.		E: No change to the draft PNA operational issue and outside the e PNA. The respondent will be and asked to share details of the This information will then be shared bunity Pharmacy Contract Lead for their on and response.
3	Sections 7, 8, 9 10 and Part 4 Appendices)	No			OUTCOME: No change to the draft PNA  Data in the draft PNA highlights the responses received in the Pharmacy Contract Survey in relation to accessibility.  This is an operational issue and outside the scope of the PNA. The respondent will be contacted and asked to share details of the pharmacy. This information will then be shared with Community Pharmacy Contract Lead for their consideration and response.

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
4	Relevant to a Yes pharmaceutical needs assessment,		1.0 I am aware of all	Noted OUTCOME: No change to the draft PNA
4			2.0 I use the NHS location on Liverpool's London Road for my jabs. I walk extensively across Liverpool - Otterspool Promenade, Leeds-Liverpool Canal, Walton Hall Park, TransPennine Route etc.	Noted OUTCOME: No change to the draft PNA
4		Yes	3.0 Taking blood pressure	Noted OUTCOME: No change to the draft PNA
4		Yes	A.0  New medicines service, Covid vaccinations, blood pressure service, 24 hour / ABPM blood pressure monitoring service, NHS 111 referrals for emergency supply of medicines and minor ailments, travel advice / vaccination services, differential diagnosis for more serious health conditions and appropriate signposting for red flag symptoms, assessment of need and supply of compliance aids / blister packs, ordering of medication for vulnerable patients, liaising with GP practices/consultants to help patients with queries about the safe supply of their medication, discharge medicines service.	OUTCOME: No change to the draft PNA Many of the services listed in this comment are covered within the draft PNA document or are not those services that have to be considered as part of the PNA process.  It is recognised that some pharmacies will provide a range of services privately which does add to the access opportunities for residents.

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
4	Do you believe the pharmaceutical needs assessment has provided the information to inform future pharmacy market entry decisions?		5.0 Should be more info about Dental awareness and emergency services.	OUTCOME: No change to the draft PNA
4			I think walk in pharmacies out of hours chemists do not always work. I think chemists should be open on a Sunday as if you go to a walk in hospital your prescription gets sent to ASDA Liscard and if you are elderly or disabled it is a long walk. Include hospital chemists and HealthWatch Wirral.	OUTCOME: No change to the draft PNA  The draft PNA concludes that there is a lack of essential pharmaceutical services within the borough at certain times: Monday to Saturday 9.00-10.00pm, and Sunday 4.00-10.00pm.  Travel times are considered in the draft PNA with a range of travel maps included.  Acute Hospital Pharmacy Services are noted in the draft PNA. Legislation and guidance do not require these Hospital Pharmacy services to be included in detail as the PNA reflects community pharmacy provision.  HealthWatch Wirral are a member of the PNA Development Group.

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
5	Do you believe the No 1 pharmaceutical		1.0 My pharmacy is not disabled accessible	Noted OUTCOME: No change to the draft PNA See answer to Question 2/Comment 1
5	inform future pharmacy market entry decisions?	Not sure	2.0 See my previous comments. A revision to NHS health strategy could significantly reduce the demand for pharmaceutical support.	OUTCOME: No change to the draft PNA
5		Not sure	3.0 Not very clear	Noted OUTCOME: No change to the draft PNA See answer to Question 1/Comment 2
5		Not sure	There is no mention of how the pharmacies are / should be funded to enable them to operate for longer hours. The assessment only mentions improvement grants and the additional cost of complying with disability legislation.  My local pharmacy is stopping opening on Saturdays, which is down to lack of funding / support for pharmacies by both national and local government.	OUTCOME: No change to the draft PNA  Guidance stipulates that the PNA should be an assessment of local need and provision. Contractual arrangements and funding of provision are outside the scope of a PNA.

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board	
5	Do you believe the pharmaceutical needs assessment has provided the information to inform future pharmacy market	No	5.0 The public sector is incapable of assessing what the private sector requires due to its substandard skill set.	OUTCOME: No change to the draft PNA	
5	entry decisions?	Not sure	There is no connection to the Wirral plan for the next 10 years, so this totally makes no sense in light with the plan to build so many houses. these PNA services need to be there in order to ensure the new demand for services is meant, although this is a 3 year plan surely the service should be indicating to PNA providers the current planning expectations	Noted  OUTCOME: No change to the draft PNA  See answer to Question 2/Comment 5  See answer to PNA  See answer to Question 2/Comment 5  The the new rivices is the this is a rely the be NA  Burrent	
5		No	7.0 Needs are not static. They are constantly changing. There should be provision for this in the planning.	OUTCOME: No change to the draft PNA  See answer to Question 2/Comment 5	

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
5	Do you believe the pharmaceutical needs assessment has provided the information to inform future	Not sure	8.0 You ignore what people write so why should I bother writing anything	OUTCOME: No change to the draft PNA  See answer to Question 1/Comment 3
5	pharmacy market entry decisions?	Not sure	9.0 Future population planning difficult to predict	OUTCOME: No change to the draft PNA  See answer to Question 2/Comment 5
5		Not sure	10.0 Unclear	OUTCOME: No change to the draft PNA  See answer to Question 1/Comment 2
5		Yes	Agree it will inform future market entry decisions, but I do not think the walk in service works if you are unwell. As I ended up at the Drs because the chemist does not treat me. I think more feedback from chemists and people accessible send you text to say what did you think of services? Stay open longer on Sunday.	OUTCOME: No change to the draft PNA  This is an operational issue and outside the scope of the PNA. The respondent will be contacted and asked to share details of the pharmacy. This information will then be shared with Community Pharmacy Contract Lead for their consideration and response.
5		No	Asked to refer to question 6, response 13.0 below	OUTCOME: No change to the draft PNA  See answer to Question 6/Comment 13

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
6	Do you agree with the key findings and conclusions of the draft Wirral Pharmaceutical Needs Assessment 2025-2028? (See	No	1.0 My pharmacy is not disabled accessible	OUTCOME: No change to the draft PNA  See answer to Question 2/Comment 1
6	Executive Summary and Part 3 of the PNA - Section 10)	No	2.0 See above comments. 4(2) and 2(2)	OUTCOME: No change to the draft PNA
6		Not sure	3.0 The figures in the PNA did not appear to reflect the local area.	OUTCOME: No change to the draft PNA  The PNA uses a range of data and sources to understand and present local need. Where available, data is presented at electoral ward level to help ensure that variation in both need and provision can be assessed.
6		Not sure	4.0 Not very clear.	OUTCOME: No change to the draft PNA  See answer to Question 1/Comment 2

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
6	Do you agree with the key findings and conclusions of the draft Wirral Pharmaceutical Needs Assessment 2025-2028? (See Executive Summary and Part 3 of the PNA - Section 10)	Not sure	There is no mention of how the pharmacies are / should be funded to enable them to operate for longer hours. The assessment only mentions improvement grants and the additional cost of complying with disability legislation.  My local pharmacy is stopping opening on Saturdays, which is down to lack of funding / support for pharmacies by both national and local government.	OUTCOME: No change to the draft PNA  Guidance stipulates that the PNA should be an assessment of local need and provision. Contractual arrangements and funding of provision are outside the scope of a PNA.  The finalised PNA is used by NHS Pharmacy commissioners when assessing applications to open a pharmacy.
6		No	this is not complete and does not meet the needs no facts are presented to support the conclusions provided	OUTCOME: No change to the draft PNA  See answer to Question 1/Comment 2

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
6	Do you agree with the key findings and conclusions of the draft Wirral Pharmaceutical Needs Assessment 2025-2028? (See Executive	Not sure	7.0 I feel there is an effort to match the needs assessment to the planned spend. Almost like putting the cart before the horse.	OUTCOME: No change to the draft PNA  See answer to Question 1/Comment 2  See answer to Question 6/Comment 5
6	Summary and Part 3 of the PNA - Section 10)	No	Pharmacies should be able to prescribe and supply medication, do basic tests like UTI checks, cholesterol, Vitamin b injections. My parent's pharmacist says there is a waiting list for delivery. My 94 and 96 year old parents cannot get out themselves anymore. We often go to collect, and it is either not ready, incomplete or they spend ages trying to find it. Urgent acute medication can take a week to get.	OUTCOME: No change to the draft PNA  This is an operational issue and outside the scope of the PNA. The respondent will be contacted and asked to share details of the pharmacy. This information will then be shared with Community Pharmacy Contract Lead for their consideration and response.
6		Not sure	9.0 You ignore what people write so why should I bother writing anything	OUTCOME: No change to the draft PNA  See answer to Question 1/Comment 3

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
6	Do you agree with the key findings and conclusions of the draft Wirral Pharmaceutical Needs Assessment 2025-2028? (See Executive Summary and Part 3 of the PNA - Section 10)	No	Pharmacy does not need to be open until 10pm	OUTCOME: No change to the draft PNA  A range of information was used to consider population need in relation to pharmacy provision. This included pharmacy opening hours and current provision of Urgent Treatment and Walk-In services.  These services are generally open until 10.00pm at designated sites across Wirral, Monday to Sunday, all year round. Aligning pharmacy opening times will help ensure residents have access to effective and safe out of hours care.  Information on provision was also triangulated with insight provided by residents and local clinicians.  It is important to note, that low footfall does not mean there is no clinical need.

Q?	Detail	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
6	Do you agree with the key findings and conclusions of the draft Wirral Pharmaceutical Needs Assessment 2025-2028? (See Executive Summary and Part 3 of the PNA - Section 10)	11.0 (Response -No) Does not need to be open till 10pm  And I get when you say if new housing is built there is provision for people to access these pharmacies. But the pharmacy itself is not getting bigger or getting more NHS provisions so surely there will be a deficit, and you will need new pharmacies to deliver care to new housing Some prescriptions can take up to 7 days to be sorted now from my pharmacy as it is. If you add a whole new housing estate or 5 Into the area surely not creating more pharmacies and going with the cheaper option to open till 10pm The wait for existing meds can be 7 days? Does that mean as an existing household then adding more households to the same provided pharmacies the wait could be 2 weeks then? If you have every 2 week prescription, would you then get it and order more the same day?  It does not seem cost effective to get around the overpopulated areas problem by just opening pharmacies till 10pm. The wider NHS system needs looking at - as my profession has been nursing there are still massive gaps in care. Can the pharmacies you state you have that cover the areas which are struggling as it is take on more houses without the pharmacies growing in size? Just opening on a Sunday or till 10pm is not going to fix issues for existing households already so how can these issues be sorted for potentially new households?  The wider system needs looking at.	OUTCOME: No change to the draft PNA  See answer to Question 6/Comment 9 – opening to 10.00pm  See answer to Question 2/Comment 5 – planning and future housing  In addition, in terms of Pharmacy capacity, when surveyed, 48 of the 66 contractors who responded, said they had sufficient capacity to manage any future increased demand with a further 12 (18%) suggesting that with some alterations to premises they too could manage any possible future increases. (Results of Wirral Pharmacy Contractors Survey (July to September 2024) (Appendix 6)

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
6	Do you agree with the key findings and conclusions of the draft Wirral Pharmaceutical Needs Assessment 2025-2028? (See Executive Summary and Part 3 of the PNA - Section 10)	No	12.0 There are no pharmacies in Upton village, and one recently closed on Greasby. Queues are very long now to get your prescription over the counter. Many pharmacies have a waiting list to get a blister pack.	Noted OUTCOME: No change to the draft PNA  According to NHS England data, Upton Ward has 4 Pharmacies at Asda, Heatherlands, Lees and Upton Pharmacy.  This is an operational issue and outside the scope of the PNA. The respondent will be contacted and asked to share details of the pharmacy. This information will then be shared with Community Pharmacy Contract Lead for their consideration and response.
6	Do you agree with the key findings and conclusions of the draft Wirral Pharmaceutical Needs Assessment 2025-2028? (See Executive Summary and Part 3 of the PNA - Section 10)	a) Do not believe a need has been proven or demonstrated adequately, especially with regards to time of necessary access. We believe this decision is more driven by political pressure to replace what was once there, rather than actual proven need which we do not think is good application of the process.		OUTCOME: The final PNA will be amended to ensure that all references to the lack of provision after 9pm, is clearly specified as 'between 9.00pm and 10.00pm'.  Response to the further comments: (Query a) relates to response a) and so on.  a) The draft PNA has been developed by a muti-agency PNA Development Group, on behalf of the Director of Public Health for Wirral. (see Page 3 of the draft PNA for PNA Development Group Membership) This helped to ensure that the PNA was developed collaboratively and utilised the expertise and experience of a range of professionals and key stakeholders. Data on population need, along with information on local pharmacy provision has been triangulated with insight provided by local residents, local Pharmacy Contractors, NHS Commissioners and local clinicians to help ensure an objective and comprehensive assessment of need.

Do you agree with the key findings and conclusions of the draft Wirral Pharmaceutical Needs Assessment 2025-2028? (See Executive Summary and Part 3 of the PNA -Section 10)

- b) Contractors have been on the brink of collapse as businesses. The recent economic review showed that there was a cost to operate the community pharmacy service in England was just over £5 billion and the remuneration was £2.592 billion up until 31st March 2025 and £3.073 billion thereafter so has driven some pharmacies to close as not financially viable to operate.
- c) This has been especially prevalent in pharmacy contracts who opened under the 100 hour per week exemption where you did not need to demonstrate a need for the pharmacy to have a contract application approved. This basically means that the pharmacies opening long hours where there was not a need have since withdrawn but have left some public and elected member opinions that they were being utilised.
- d) The remaining contractors have also been told by NHS England to reduce their hours according to demand in order to survive and have been given the tools to do that which they have done so diligently. They have looked at the hours where patient demand does not present over a long period of time and reduced them accordingly.

- b) The economic operating context for local Pharmacies, whilst obviously relevant, is outside of the direct scope of the PNA, as determined by statutory legislation and guidance. This further helps to ensure that the PNA is an objective process which considers the needs of local residents. Oversight by the independent Director of Public Health, on behalf of the Health and Wellbeing Board, neither of whom have responsibility for the commissioning or provision of pharmacy services, ensures that there are no conflicts of interest and that the local PNA development process is objective and transparent.
- c) The PNA is an assessment of population need. It is not within the scope of the PNA to assess or comment on business viability, sustainability or profitability. It is, however, important to note that low footfall does not mean there is no clinical need.

d) The PNA is an assessment of population need. It is not within the scope of the PNA to assess or comment on business viability, sustainability or profitability. It is, however, important to note that low footfall does not mean there is no clinical need.

Do you agree with the key findings and conclusions of the draft Wirral Pharmaceutical Needs Assessment 2025-2028? (See Executive Summary and Part 3 of the PNA -Section 10)

- e) To be then told that there was an unmet need is both surprising and insulting to those contractors and in our belief, it is quite socially irresponsible to declare a need in such an important document without actually being able to prove that need
- f) it will potentially mislead contractors or prospective contractors to invest in a business which will not be sustainable long term and may well make the local pharmacies around them unsustainable.
- g) There are provisions within the regulations for NHS England to refuse an application where it would lead to overprovision in an area. We believe any new application against this PNA would be relevant to consider this overprovision.
- h) Pharmacies choose their opening hours based on where there is business to be done, there is not. Regulations have now also been laid before parliament that allows contractors to adjust their core hours where the demand for services is not present.

- e) The PNA is an assessment of population need, developed collaboratively through a multi-agency group, utilising the expertise and experience of a range of professionals and key stakeholders. Data on population need, along with information on local pharmacy provision has been triangulated with insight provided by local residents, local Pharmacy Contractors, NHS Commissioners and local clinicians to help ensure that an objective and comprehensive assessment of need informed the conclusions and recommendations.
- f) It is not within the scope of the PNA to assess or comment on business viability, sustainability or profitability. It seems reasonable to assume that any potential providers will undertake a business analysis prior to making an application to NHS England. It is also important to note that low footfall does not mean there is no clinical need.
- g) The PNA is an objective assessment of need and will be used by NHS England Pharmacy Commissioners when reviewing applications to open a pharmacy. It is for NHSE to apply any relevant provisions when reviewing applications.
- h) The PNA is an objective assessment of need and will be used by NHS England Pharmacy Commissioners when reviewing applications to open a pharmacy. Any potential providers will assumably undertake a business analysis prior to making an application to NHS England.

i)	The gap times of "after 9pm" on
	weekdays are not specific enough for
	this document. 3am is after 9pm.

- j) The implications of the wording within the PNA will open the doors for a new contractor, however if the need is proven then we suggest that commissioning a rota to cover those hours, alongside appropriate data collection would be more appropriate and allow it to be measured and monitored.
- i) All instances of this lack of specificity have been identified in the draft PNA document and will be addressed in the final version.
- j) A supplementary statement, which mirrors the expressed need in the PNA for essential hours, has been published since February 2025. To date NHS Cheshire and Merseyside Pharmacy Team have not received any applications in relation to this statement. Commissioning of provision is outside of the scope of the PNA. If a rota were put in place, with local Pharmacy providers opening at the times specified, Monday to Saturday 9.00-10.00pm, and Sunday 4.00-10.00pm then the gap in essential services identified in this draft PNA would be addressed.

Q?	Detail	Survey	Comment from	Response on behalf of Wirral Health and Wellbeing Board
		Response	consultation	
6	Do you agree	No	14.0	Noted
	with the key		Does not clearly	OUTCOME: No change to the draft PNA
	findings and		explain what	The PNA uses best available data to provide an up to date and accurate overview
	conclusions of		services are	of pharmacy services. Specific PNA content on services includes:
	the draft Wirral		provided by	Section 7.0. pharmacy premises, pharmacy providers, community pharmacy
	Pharmaceutica		pharmacies.	locations and level of provision, access to and provision of community
	I Needs			pharmacy services in local authorities bordering wirral, getting to the
	Assessment			pharmacy, pharmacy opening hours, access for people with a disability and/or
	2025-2028?			mobility problem, access for clients whose first language is not English and
	(See Executive			pharmacy consultations.
	Summary and			Section 8.0. Prescribing as prescribing volume, medicines shortages, public
	Part 3 of the			survey responses aligned to dispensing, prescription delivery services,
	PNA - Section			reasonable adjustments,
	10)			Section 9.0 Advanced, enhanced and locally commissioned service provision, Pharmacy provision of advanced, enhanced and locally
				commissioned services, how essential, advanced and locally commissioned
				pharmacy services support local priority health needs.
				<ul> <li>Appendices 9, 10 and 11 on details of all 77 pharmacies and services they provide relevant to the PNA</li> </ul>

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
6	Do you agree with the key findings and conclusions of the draft Wirral Pharmaceutical Needs Assessment 2025-2028? (See Executive Summary and Part 3 of the PNA - Section 10)	No	I disagree that late Sunday opening is needed in most pharmacies. I think they should all be open on a Saturday, however. When/if people need a prescription over the weekend they need to be told or made aware of the nearest open pharmacy.	OUTCOME: No change to the draft PNA  See answer to Question 6/Comment 10
6		Not sure	Some are good and some are not good with treating you and some chemists have medications, and some will only treat you if you have had symptoms for more than a week. Some have medication and some do not.	OUTCOME: No change to the draft PNA
6		Yes	17.0 Because the more pharmacies available, the easier it is to visit it a local pharmacy.	OUTCOME: No change to the draft PNA
6		Yes	18.0 Do pharmacies get inspected? If they do, then a performance chart should be displayed inside pharmacies or on windows.	OUTCOME: No change to the draft PNA

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
7	Do you have any further comments about the Wirral Pharmaceutical Needs Assessment 2025-2028?	Yes	1.0 Boots Prenton/Holmlands Pharmacy was incorrectly listed as still being open when in fact it was sold last year 2024. As of 15th November 2024, it changed ownership.	OUTCOME: Alterations will be made where necessary in the final PNA  This contract change occurred during the drafting of the PNA. The data sources used continued to use the previous site name (Boots) therefore Holmlands Pharmacy is noted in Appendix 3 and Appendix 4 (November 2024) to account for this change occurring midprocess.
7		Yes	2.0 My pharmacy is not disabled accessible	OUTCOME: No change to the draft PNA  See answer to Question 2/Comment 1
7		Yes	3.0 I started my healthy lifestyle immediately post Covid. Harvard Professor David Sinclair a series of videos on YouTube explaining the rationales for healthy lifestyles amongst seniors.	OUTCOME: No change to the draft PNA
7		Yes	4.0 It seems to cover all the needs identified, though situation is in an uncertain state at the moment due to world instability so should be flexible	OUTCOME: No change to the draft PNA

Q?	Detail	Surve		Response on behalf of Wirral Health and Wellbeing Board
		Response consultation		
7	Do you have any further comments about the Wirral Pharmaceuti cal Needs Assessment 2025-2028?	Yes	f.0 I agree that pharmacies being open later will benefit domiciliary care companies when needing medication advice. Also, for evening prescription collections	OUTCOME: No change to the draft PNA
7		Yes	6.0 Answered questions following reading Easy Read PNA.	OUTCOME: No change to the draft PNA
7		Yes	7.0 I have no further comments	OUTCOME: No change to the draft PNA
7		Yes	8.0 I think areas such as Caldy and Thornton Hough should have better provision. I understand that there is high car ownership, but as these populations get older car use will decrease leading to inequity in access to pharmacy services.	OUTCOME: No change to the draft PNA  Data from the draft PNA highlights the responses received in the Pharmacy Contract Survey. All 66 pharmacies offer either a free (46) or paid for (20) medications delivery service (as of September 2024). This option could and should support local residents in all areas, and those in question, to access their medication without needing to travel.  However, the public survey of pharmacy services (November 2024) highlighted only 30% of respondents (736) knew such a service existed.  This is an operational issue. This delivery opportunity and lack of public awareness requires further investigation by Community Pharmacy leads and so will be highlighted for their consideration and response.

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
7	Do you have any further comments about the Wirral Pharmaceutical Needs Assessment 2025-2028?	Yes	9.0 There looks to be a need for increased provision in the late evening and potentially overnight	OUTCOME: No change to the draft PNA
7		Yes	A very lengthy document. Was it necessary to put out for public survey!	OUTCOME: No change to the draft PNA  See answer to Question 1/Comment 1  See answer to Question 1/Comment 2
7		Yes	My issue is if funding gets reduced again by the government and doctors continue to pass patients to a pharmacy rather seeing the patients directly.	OUTCOME: No change to the draft PNA

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
7	Do you have any further comments about the Wirral Pharmaceutical Needs Assessment 2025-2028?	Yes	Charges for social care 'blister packaging' needs to be standardised as some charge and some do not, also the offer of this service is not provided by all pharmacies. Not all pharmacies want to work with social care provisions. We do use some pharmacies outside of Wirral as they provide a better service including delivery than ones within the location. Some issues with responses to phone calls and emails with queries to meds that have been delivered etc. Some online info for opening times is incorrect. Having to go to multiple pharmacies to get a script filled is an issue as not all stock every medication or have issues with supply.	OUTCOME: No change to the draft PNA  This is an operational issue.  The respondent will be contacted to be asked if they can make us aware of the pharmacies in question. Then the information can be shared with leads for Community Pharmacy for their consideration and response.
7		Yes	Make it more clear to population	OUTCOME: No change to the draft PNA

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
7	Do you have any further comments about the Wirral Pharmaceutical Needs Assessment 2025-2028?	Yes	This is a very comprehensive review of Pharmacy Services on Wirral. It might be worth adding something about the government changing the 100 hour contract to reduce to a minimum of 72 hours and stipulation that they had to open until 9pm. This has had a detrimental effect on the opening hours of pharmacies as follows: The lack of essential services between Monday and Saturday, after 9.00pm, that meet the pharmaceutical needs of Wirral residents. This was bound to happen after the government made this change to the hours.	OUTCOME: No change to the draft PNA  See section 7.5.2 Former 100 hour contracted pharmacies  See answer to Question 6/Comment 13
7		Yes	this report should not be accepted as suitable	OUTCOME: No change to the draft PNA

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
7	Do you have any further comments about the Wirral Pharmaceutical Needs Assessment 2025-2028?	Yes	In my area there were 3 pharmacies which provided a good service. This has been reduced to 1 pharmacy, much longer queues, poorer communication, miserable staff and dissatisfied customers. This is a negative outcome.	OUTCOME: No change to the draft PNA  This is an operational issue.  The respondent will be contacted to be asked if they can make us aware of the pharmacies in question. Then the information can be shared with leads for Community Pharmacy for their consideration and response.
7		Yes	17.0 Longer opening hours and a rota so that at least one pharmacy on Wirral is available and open 24 hours 365 days	OUTCOME: No change to the draft PNA
		Yes	18.0 See above answer	OUTCOME: No change to the draft PNA See answer to Question 6/Comment 11
7		Yes	Pharmacy needs to be open to dispense prescriptions given to patients at out of hours GP service. Arrowe Park hospital does not cater for this.	OUTCOME: No change to the draft PNA  This aspect is covered in the recommendations where the current pharmacy contractor reduced their supplementary opening hours on Sundays from the previous 10.00pm closure to then close, since December 2024, at 2.30pm.

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
7	Do you have any further comments about the Wirral Pharmaceutical Needs Assessment 2025-2028?	Yes	There are no pharmacies in Upton village, and one recently closed on Greasby. Queues are very long now to get your prescription over the counter.  Many pharmacies have a waiting list to get a blister pack.	Noted OUTCOME: No change to the draft PNA  According to NHS England data, Upton Ward has 4 Pharmacies at Asda, Heatherlands, Lees and Upton Pharmacy.  This is an operational issue.  The respondent will be contacted to be asked if they can make us aware of the pharmacies in question. Then the information can be shared with leads for Community Pharmacy for their consideration and response.
7		Yes	21.0 Longer opening times could support better access and reduced waiting times.	Noted OUTCOME: No change to the draft PNA
7		Yes	Yes. West Kirby The nearest 2 Chemists to the new Very Large Marine Lake NHS Medical Centre has just lost their pharmacists.	Noted OUTCOME: No change to the draft PNA  This is an operational issue.  This information will be shared with leads for Community Pharmacy for their consideration and response.
7		Yes	23.0 The public are generally not aware of all the services pharmacies provide.	Noted OUTCOME: No change to the draft PNA  This is an operational issue.  This information will be shared with leads for Community Pharmacy for their consideration and response.

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
7	Do you have any further comments about the Wirral Pharmaceutical Needs Assessment 2025-2028?	Yes	Yes, I would question the need for some prescriptions to send to what they call the 'HUB' before they can be filled causing a delay.	OUTCOME: No change to the draft PNA  This is an operational issue.  This information will be shared with leads for Community Pharmacy for their consideration and response.
7		Yes	With older people and areas that are severely disadvantaged Wirral Health services are dealing with more problems than some more affluent areas. I think the time from ordering and receiving medication is important to know, it used to be 2 days now seems to be 3 days or even more. Some pharmacies will text if your medication is ready for collection. Many times, with our local pharmacy it is essential to call back twice in order to receive the medication required and this is frustrating, three days after ordering a prescription its often still not ready.	OUTCOME: No change to the draft PNA  This is an operational issue.  This information will be shared with leads for Community Pharmacy for their consideration and response.

Q?	Detail	Survey Response	Comment from consultation	Response on behalf of Wirral Health and Wellbeing Board
7	Do you have any further comments about the Wirral Pharmaceutical Needs Assessment 2025-2028?	Yes	Yes, more accessible information. Treatment if you are unwell, and get treated straight away, not going back a few days later. Easy talking, not using big words. More easy reads available.	OUTCOME: No change to the draft PNA  This is an operational issue.  This information will be shared with leads for Community Pharmacy for their consideration and response.