

Case Ref: CAS-270183-Q5R4N4

To be quoted on all future correspondence

Primary Care Support England

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Phone 0333 014 2884

Bolcer Ltd
7 Farthing Walk
Westwood Heath
Coventry
CV4 8GR

29/04/2024

Dear Sir/Madam

**Re: Application offering unforeseen benefits at Gaywood Drive Shops
Newbury RG14 2PR by Bolcer Ltd**

Further to my letter of 13th March 2024, please find enclosed copies of the written representations that we have received regarding the above application.

If you wish to make any comments on these representations, they should be sent to me at the above address within 14 days of the date of this letter i.e. by 13th May 2024. Please note that any new information that you submit at this stage will have little or no weight placed upon it unless it can be demonstrated that you are presenting it in response to representations submitted by another party that you believe are not true or are incorrect.

Yours faithfully,

NHS England's [Privacy Notice](#) describes how certain services are provided on behalf of Integrated Care Boards and how personal data is used. It also explains how you can invoke your rights as a data subject. We will protect your information in line with the requirements of the Data Protection Act 2018.

Bradley Munemo
Pharmacy Market Administrative Services Officer

NHS England's [Privacy Notice](#) describes how we use personal data and explains how you can contact us and invoke your rights as a data subject. We will protect your information in line with the requirements of the Data Protection Act 2018.



Boots Support Office
NHS Contracts
D90 East F08
Thane Road
Nottingham
NG90 1BS

24th April 2024

Lewis Hyde
Market Entry Officer
PCSE Enquiries
PO Box 350
Darlington
DL1 9QN

Dear Lewis

Re: CAS-270183-Q5R4N4 Application offering Unforeseen Benefits at Gaywood Drive Shops, Newbury, RG14 2PR (best estimate) by Bolcer Ltd.

Re: CAS-261308-H8K8C7 Application offering Unforeseen Benefits at Kingsland Centre, The Broadway, Thatcham, RG19 3HN (best estimate) by LP SD One Hundred Seven Ltd.

Thank you for your letters dated 13th March 2024 informing us of the above applications.

We do not have any comments to make on these applications but would be grateful if you would inform us of the outcome in due course.

Yours sincerely

Claire Brittain
NHS Contracts Lead

Dear Lewis Hyde

(market entry officer)

I write to you today as the Director of LP SD ONE HUNDRED SEVEN LTD T/A THATCHAM PHARMACY, and also on behalf of LP SD ONE HUNDRED AND SEVEN LIMITED who has an application pending consideration with reference: CAS-261308-H8K8C7. I thank you for your email informing of the market entry application notification submitted by Bolcer Ltd - under the Unforeseen Benefits process with reference: CAS-270183-Q5R4N4 and inviting me to make representations.

Looking at the explanatory notes provided to us which details the considerations that Buckinghamshire, Oxfordshire & Berkshire West ICB must make, the following are listed:

- 1) Whether or not there is already a reasonable choice of pharmacy
- 2) How easy it is for people who live or work near the applicant's proposed pharmacy to travel to existing pharmacies.
- 3) Walking routes, bus services and access by car (including parking)
- 4) Whether people who are disabled, elderly, have young children or have other accessible needs, currently have problems using local pharmacies and would benefit from the proposed pharmacy.
- 5) Whether opening another pharmacy would have any significant negative effects

I will provide my representations **against** the application on a point-by-point basis.

- 1) A reasonable choice of pharmacy.
Although, the applicant has explained that there have been several closures in the area (Lloyds Pharmacy, (RG14 5AB), Superdrug Pharmacy (RG14 1AE), and Boots (RG18 3HD), there is still a reasonable choice of pharmacies available. The applicant has said that the distance of the next closest pharmacy is more than what is deemed acceptable, we highlight below that the distance between the proposed site and the two closest pharmacies is 1.1 mile, equating to 22 minutes give or take, a non-significant difference between what is stated in the PNA as acceptable.

(I want to also use this opportunity to flag that the PNA is extremely outdated considering the vast change in pharmaceutical provisions in the area since it was published)

The services offered by pharmacies in the area needs to be considered, whether they are less than, or more than, a mile away from the proposed site. Patients in the geographical area that the applicant is seeking to offer better access to, have the options to use the likes of distant selling pharmacies or even local patient facing pharmacies who offer the delivery service such as Thatcham Pharmacy - a free service to all with no inclusion or exclusion criteria for eligibility.

LP SD ONE HUNDRED SEVEN LIMITED has also applied for a new contract to be granted offering unforeseen benefits at a more suitable location with reference: CAS-261308-H8K8C7. This application which has already been supported by the Health and Well Being Board of West Berkshire, offering an additional choice of pharmacy to the residents of this area with a 7-day a week opening service, with over 200 parking spaces.

A consensus of Berkshire showed that 10% of the population had no use of a vehicle and since this consensus was completed there has been a documented increase in road users which demonstrates that the population the applicant is seeking to accommodate have no issues or difficulties in accessing existing pharmacy contractors for services.

1.1 miles away
DAY LEWIS PHARMACY

Open

Opening times:
9am to 5:30pm

G FLOOR UNIT, ACCESS HSE, STRAWBERRY HILL ROAD, NEWBURY,
BERKSHIRE, RG14 1GE
0163541813
[Map and directions](#)

1.1 miles away
Boots

Open

Opening times:
9am to 5:30pm

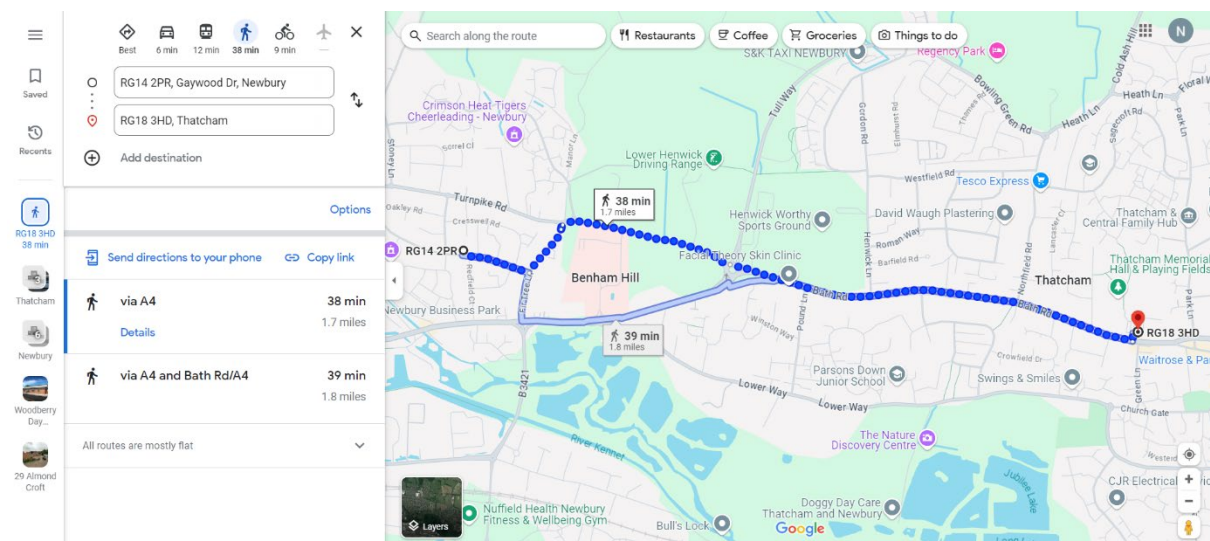
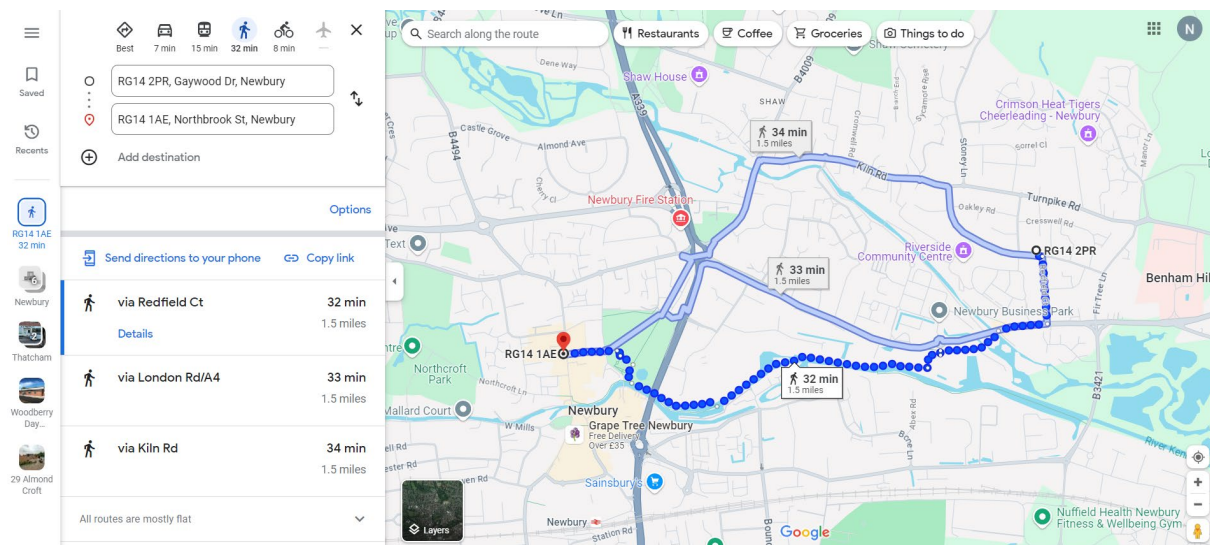
4-5 NORTHBROOK STREET, NEWBURY, BERKSHIRE, RG14 1DJ
0163540396
[Map and directions](#)

There is a slight concern that the applicant is submitting an application on the basis that there is now a vacant geographical gap in provision of services following the closures of pharmacies at the following postcodes, however the distance of the proposed site to the now closed sites is not different or improved, so it begs the question that what further benefit is there for the residents if they were already accessing services from these pharmacies regardless of distance?

The screenshot shows a Google Maps interface with a search bar at the top. The starting point is 'RG14 2PR, Gaywood Dr, Newbury' and the destination is 'RG14 5AB, Newbury'. The map displays several walking routes in blue, with callouts indicating distance and time for each route:

- via Redfield Ct: 31 min, 1.4 miles
- via Redfield Ct and A339: 34 min, 1.6 miles
- via Hambridge Rd/B3421 and B3421: 36 min, 1.6 miles

The map also shows various landmarks such as Newbury Fire Station, Sainsbury's, and several restaurants. The interface includes navigation controls, a search bar, and a list of saved locations on the left side.



2) How easy it is for people who live or work near the applicant's proposed pharmacy to travel to other existing pharmacies?

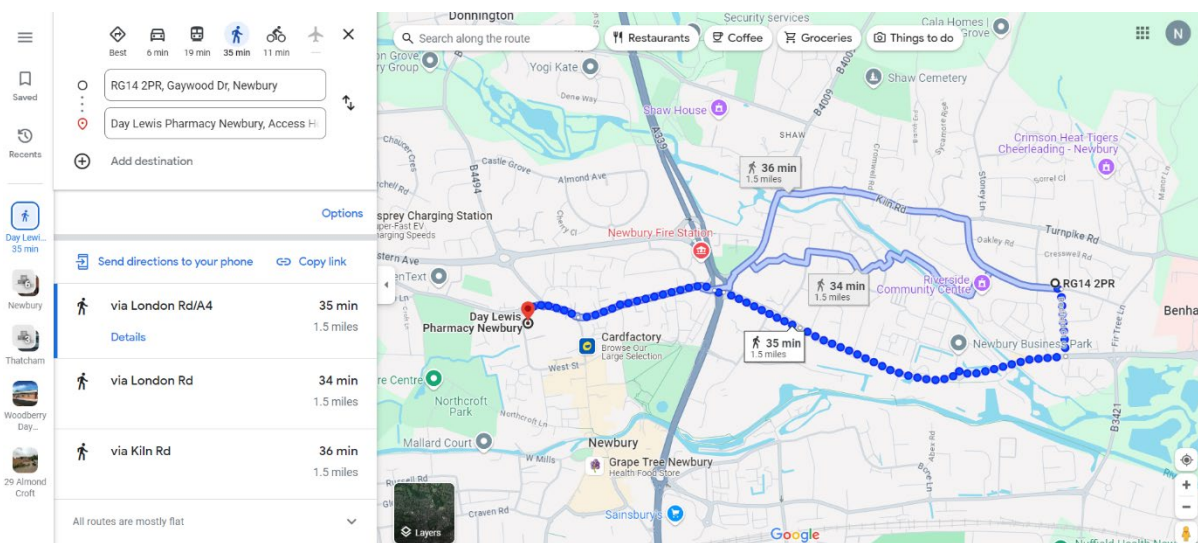
In our most humble opinion, the applicant comes across quite passionately regarding distances covered by patients in the current pharmacy provision, hence the "considerable" improvement that their application could bring to the surrounding community. Upon further looking into it, we firmly believe that as a matter of fact, the application sought does not have a significant positive impact on what is already being offered by the closest pharmacies, in terms of accessibility, i.e. bus routes, car parks or opening times.

The closest car park to the proposed location is a 24-min walk, as opposed to 7-min to Boots in Newbury town centre. Also, the proposed location has no designated parking spaces, and no designated spaces for those that may require a disabled parking bay.

As mentioned above, LP SD ONE HUNDRED SEVEN with its application reference number CAS-261308-H8K8C, seeks to considerably improve the opportunity for accessibility for patients in terms of distance and connectivity by bus, with buses running every 30min from Newbury town into Thatcham Broadway, with the bus-stop right outside our proposed location. As opposed to the applicant failing to improve the access for their patients, as they will still have to walk from their bus stop to the proposed location and back. So, again no significant improvement is sensed here.

- 3) Walking routes, bus services and access by car (including parking)
- 4) Whether people who are disabled, elderly, have young children or have other needs currently have problems using local pharmacies, and would benefit from the proposed pharmacy.

With regards to point 3 & 4: You will see that the distance from the proposed site (RG14 2PR) to the pharmacies which have closed, is no different to the distance from the proposed site to the next closest pharmacy: Day Lewis, Strawberry Hill, bringing a doubt over whether there is in fact any benefit to the local population, seeing as they are already being serviced by a pharmacy outside of the immediate locality, irrespective of distance, transport, public transport etc..



- 5) Whether opening another pharmacy would have any significant negative effects

I believe, with the residential build up that exists in the immediate surrounding area to the proposed site, there is what I would call an acceptable level of traffic in the area for the residents to face. However, by introducing a new pharmacy that will lead to a huge increase in traffic that will no doubt raise issues with the residents and create a nuisance. A residential location will always bring the question of suitability, based on how easy it is for patients visiting the location to park and be seen with no time constrictions, as well as not disturbing the already congested and busy neighbourhood life, something we are quite sceptical about, and could potentially lead to local complaints in the long run as well as bringing an

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unnecessary amount of traffic around a primary school situated less than 300 meters away from the proposed site, bringing much more higher risks of road traffic incidents with young children.

Accessibility is something very important to consider, the proposed site does not have adequate means of access for wheelchair users/patients with disabilities.

Should NHS England consider it necessary to hold an oral hearing prior to its determination of this application, we would wish to have the opportunity to attend that hearing and to make oral representations.

Yours faithfully

Nishaan Amin

Director

LP SD ONE HUNDRED SEVEN LIMITED

PCSE Enquiries, PO Box 350
Darlington DL1 9QN

By Email

Your Ref: CAS-270183-Q5R4N4

22 March 2024

Dear Sir/Madam

Application by Bolcer Ltd (the applicant) to open a pharmacy at Gaywood Drive Shops, Newbury, RG14 2PR

The LPC is pleased to have the opportunity to comment on this application.

An application offering to secure unforeseen benefits must be judged against the NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013 having particular concern to regulations 18 and 19.

There has been no Supplemental Statements issued against the current PNA published in 2022.

The LPC states that:

there is already a reasonable choice with regard to obtaining pharmaceutical services;

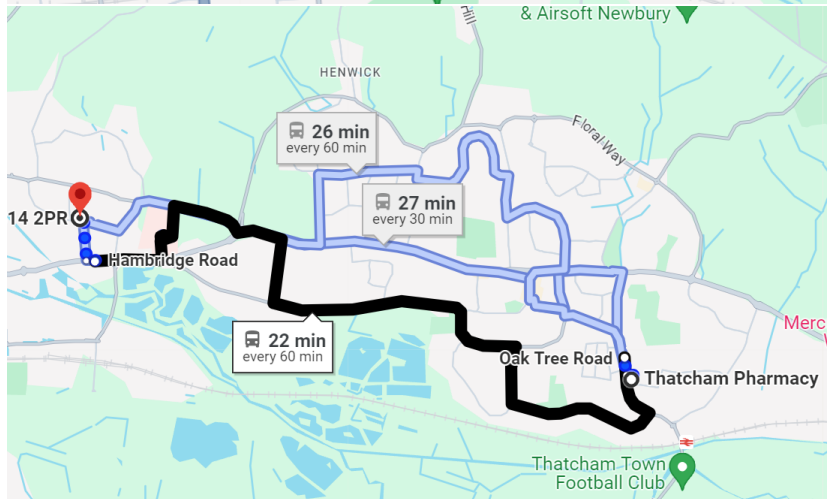
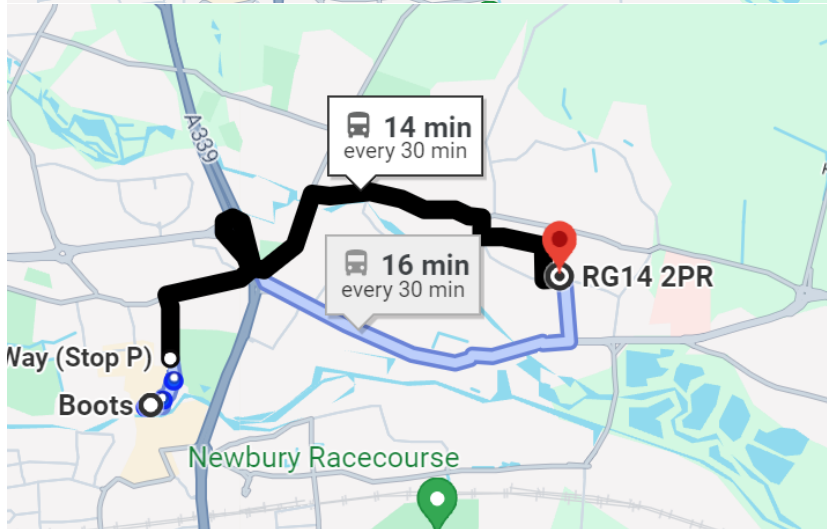
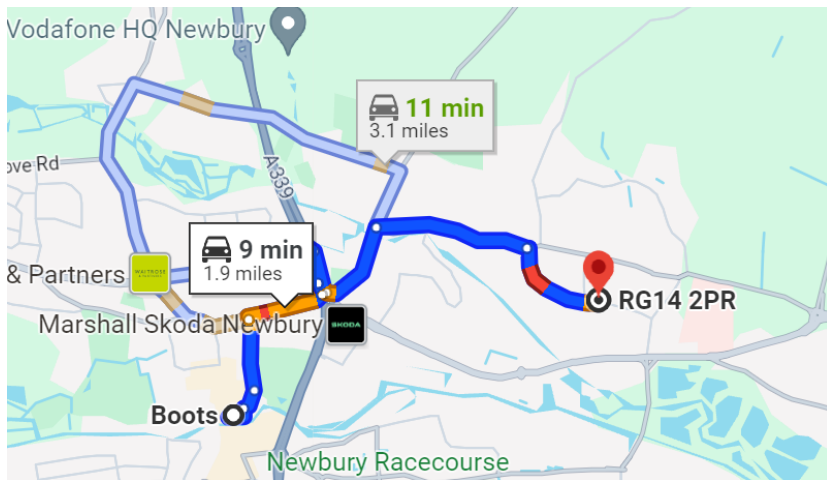
there is no evidence of people sharing a protected characteristic having difficulty in accessing pharmaceutical services; and

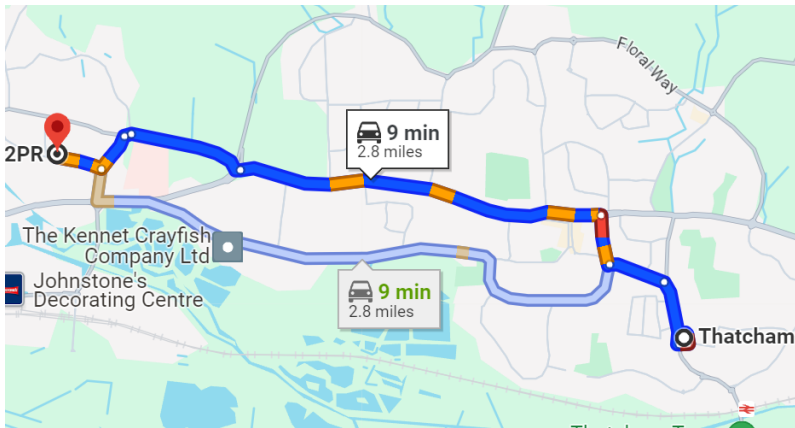
there is no evidence that innovative approaches would be taken with regard to the delivery of pharmaceutical services.

There are at least 2 Pharmacies (Boots Northbrook and Thatcham Pharmacy) within a 9 minute drive, or 20 minutes by a well served public transport system.



Homelea, School Lane, Stadhampton, Oxfordshire, OX44 7TR





On this basis we would strongly recommend that the application is refused.

Please keep the LPC informed of any decisions reached.

Yours sincerely,

David Dean
Chief Executive Officer

Community Pharmacy Thames Valley

Tel:



22 April 2024

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DL1 9QN

West Berkshire District Council
Council Offices
Market Street
Newbury
RG14 5LD

Our Ref: PNA-2024-03-13
Your Ref: CAS-270183-Q5R4N4 &
CAS-261308-H8K8C7

Dear Mr Hyde,

Re: Applications offering Unforeseen benefits at Gaywood Drive, Newbury, RG14 2PR by Bolcer Ltd and Kingsland Centre, The Broadway, Thatcham RG19 3HN by LP SD One Hundred Seven Limited

Thank you for consulting the West Berkshire Health and Wellbeing Board in relation to the above applications. The applications were considered by the Pharmaceutical Needs Assessment Sub-Committee at its meeting on 16 April 2024. The Board wishes to make written representations on these applications as set out below.

There have been four pharmacies that have closed in Newbury and Thatcham since the Pharmaceutical Needs Assessment was carried out in 2022. Two years ago, the ratio of pharmacies per 10,000 population was 1.3 in West Berkshire, compared to 2.2 for England as a whole, but as a result of the closures across the district in the period since the PNA was completed, the ratio has fallen to just 1.0 per 10,000 population.

When the Health and Wellbeing Board considered the above closures, it did not consider that they had created a significant gap in the provision of pharmaceutical services in the Thatcham area that was sufficient to justify a review of the PNA or publication of a Supplementary Statement. This was because there were no additional households placed outside a 1 mile / 20 minute travel time to their nearest pharmacy as a result of the closures, and because the Local Pharmaceutical Committee had provided reassurance that there would be sufficient capacity at the remaining pharmacies to be able to process the displaced activity.

Notwithstanding this decision, the Board would welcome additional pharmacies in Gaywood Drive, Newbury, and within the Kingsland Centre in Thatcham town centre as a means of helping to increase capacity and choice for patients, and to improve the overall resilience of the pharmacy sector within West Berkshire. The additional pharmacies would also help to support the Pharmacy First Service, which will see greater numbers of referrals to pharmacies for a variety of conditions and minor illnesses.

The proposed pharmacy at Gaywood Drive would be the only one within the Newbury Clay Hill Ward to the north-east of the town centre, which has a population of 7,547 residents according to the 2021 Census. It would also serve parts of Thatcham West ward, as well as major new housing developments that are currently being built to the north of Newbury and on Lower Way, Thatcham.

Both Newbury Clay Hill and Thatcham West Wards have a higher proportion of families with very young children compared with the West Berkshire and England averages. These would be more likely to need pharmacy services than the wider population.

The Gaywood Drive site has good accessibility for a suburban location, with easy walking access from surrounding residential areas, as well as a bus routes and bus stops nearby, and plenty of on-street parking in the vicinity of the site.

The proposed pharmacy would have late evening and Saturday opening, which would be welcomed. Prior to closing in 2023, the Lloyds Pharmacy in Sainsbury's would have been the closest one to offer late evening opening for many residents of Newbury Clay Hill. Currently, residents have to travel to one of the pharmacies on the southern fringe of the town to be able to get to a pharmacy open after 6pm. Therefore, the Gaywood Drive pharmacy would enhance evening access.

As mentioned in our previous submission, the proposed pharmacy at the Kingsland Centre would enhance accessibility for patients living in Thatcham, since the location is well served by local walking, cycling and public bus networks. The Kingsland Centre has its own car park and there is plenty of on-street parking within the town centre, with level, step-free access from both directions. Furthermore, the location is close to a number of sheltered housing / retired living developments and so would be easily accessible by residents of these facilities.

The proposed pharmacy would be the only one in Thatcham to open seven days a week, which would be welcomed, since patients currently have to travel to Newbury to access a pharmacy that is open on Sundays. The application also indicates that the pharmacy will offer free home delivery, which would deliver significant benefits for patients who are less mobile and / or on low incomes.

Although the pharmacy would be in Thatcham Central ward, which has low levels of deprivation, it would be used by all Thatcham residents, including those living in Thatcham North-East, which has significant pockets of deprivation (20% of LSOAs within this ward are in the third decile on the Index of Multiple Deprivation). We see a correlation between poorer health (and health behaviours such as smoking and substance misuse) and increased deprivation. We would therefore expect to see a greater demand on pharmacy services (including Advanced and Enhanced Services, such as smoking cessation and needle and syringe exchange services) serving more deprived areas.

It should also be noted that the West Berkshire Local Plan Review proposes to allocate 1,500 additional homes to the north-east of Thatcham and these residents would also be likely to use the proposed pharmacy at the Kingsland Centre.

In summary, the Board is supportive of both applications and believes that they will deliver significant additional benefits for patients. The Board does not foresee any significant negative effects as a result of the proposal.

Please let us know if you have any queries in relation to the above comments.

Yours sincerely,

Councillor Alan Macro

Chairman of West Berkshire Health & Wellbeing Board