

29 April 2025

REF: SHA/26332

8th Floor
10 South Colonnade
Canary Wharf
London
E14 4PU

**APPEAL AGAINST BATH & NORTH EAST SOMERSET,
SWINDON AND WILTSHIRE ICB DECISION TO REFUSE
AN APPLICATION BY CAREPLUS PHARMACY LTD FOR
INCLUSION IN THE PHARMACEUTICAL LIST
OFFERING UNFORESEEN BENEFITS UNDER
REGULATION 18 AT THE MAIN COMMERCIAL AREA
WITHIN CORSHAM, SN13 0HL (BEST ESTIMATE)**

Tel: 020 3928 2000
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1 Outcome

- 1.1 The Pharmacy Appeals Committee ("Committee"), appointed by NHS Resolution, quashes the decision of the Commissioner and redetermines the application.
- 1.2 The Committee determined that the application should be granted.
- 1.3 As the proposed pharmacy is within 1.6 km of a controlled locality the impact on any dispensing patients must be considered, the issue of gradualisation, is remitted back to the Commissioner to consider.

A copy of this decision is being sent to:

Careplus Pharmacy represented by Healthcare Plus Consulting Ltd (the Applicant)
PCSE on behalf of the Commissioner
Shaunaks Pharmacy represented by Rushport Advisory LLP
Corsham Town Council

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1 A summary of the application, decision, appeal, representations, observations, late observations and further comments are attached at Annex A.

2 Site Visit

2.1 The Pharmacy Appeals Committee (“Committee”) appointed by NHS Resolution had before it the papers considered by the Commissioner, together with a plan of the area showing existing pharmacies and doctors’ surgeries and the location of the proposed pharmacy.

2.2 It also had before it the responses to NHS Resolution’s own statutory consultations.

2.3 The Committee held a virtual hearing to determine the application. This took place on 27 March 2025. The Committee comprised of Mrs L Lee (Chair), Mr M Smith and Ms K Limm.

2.4 Careplus Pharmacy Ltd was represented by Nikhil Koria. Shaunaks Pharmacy was represented by Conor Daly accompanied by Vishal Shaunak (Director). Carolyn Beale, (Support & Implementation Manager, Community Pharmacy Swindon & Wiltshire) and David James Martin, (Chief Executive of Corsham Town Council) observed the hearing.

2.5 Before the hearing, the Committee members had individually undertaken site visits and prepared reports of their visits.

Committee Member one, visit on 4 March 2025:

2.6 *Arrived in Corsham via Bath Road and turned left into Pickwick Road and immediately right into Beechfield Road. Parked easily in large car park adjacent to Springfield Leisure Complex across the road from the Porch Surgery and Shaunaks Pharmacy [3 hours free]. The surrounding area is residential. There is also a car park on the surgery site which was almost full. A Family Health Centre on the same site is closed and boarded up.*

2.7 *The surgery and pharmacy are purpose built in a Cotswold style. Access to the surgery from the car park is level and from this entrance there is a level path to the separate entrance to the pharmacy. Another access to the pharmacy from the car park has three well marked steps. The pharmacy is compact and appears professionally orientated. At the time of my visit [12.30] it had just closed for lunch, and it was not possible to look around inside. There is a discreet ‘Pharmacy’ green cross sign, but I was unaware of any signage to assist patients unfamiliar with the area to find surgery or pharmacy. A*

conspicuous sign 'Free Prescription Delivery Service for Everyone' is displayed at the pharmacy entrance but following the link thereon directs to a 'Distance Selling Pharmacy' site.

- 2.8 I then turned left to the junction with Pickwick Road and then right along there, passing across the roundabout at Newlands Road and then left at the Methuen Arms, to the High Street Car Park [0.4m]. There is a short pathway to the pedestrianised part of High Street [<100m]. The shopping area is very compact comprising High Street and a pedestrian area, Martingate, eastwards to Newlands Road. There is a large CoOp supermarket and a variety of small shops including a baker, butcher, bookshop, art gallery, florist, greengrocer, hardware shop, cafes and a couple of charity shops. Adjacent to the CoOp there is another large car park. Both car parks are free for 2 hours. The former Boots pharmacy with some remaining signage is in the centre of the shopping area in Martingate.
- 2.9 To gain a wider picture of the town I drove north up Newlands Road, left on to Priory Street, left again on to Bath Road and again left down Pickwick Road to return to the centre. It is residential with more modest housing along Priory Street and large houses along Pickwick Road some of which may be in professional use but there are no other shops.
- 2.10 I drove to Box Pharmacy, 3.5 m south west along Bath Road. A considerable amount of new housing had been constructed on this side of Corsham. The road was hilly. Box Surgery was on the R approaching the village and the pharmacy about 0.3 miles further on the left. Box is a pretty village, but parking is very constrained with double yellow lines outside the pharmacy.
- 2.11 Returning to Corsham I then drove north east to locate Rowden Hill Pharmacy. After 2.7 miles there is a large 'Retail Park' with Sainsburys, Aldi, M&S Food, Currys and other retailers. A further 0.9m on is Rowden Hill Pharmacy, co-located with Rowden Hill Surgery within a dense residential area. The pharmacy is signposted from the main road.
- 2.12 For completeness I then continued another mile to Chippenham to find the nearest Boots pharmacy. This is located adjacent to the 'River' car park and is an estimated 4.6m from Corsham using very busy roads.

Committee member two, visit on 11 March 2025:

- 2.13 I arrived in Corsham by car at 10.45 going first to the Springfield Leisure complex. A section of the car park had been cordoned off, apparently for maintenance work, and the remaining parking places were full. I therefore drove the short distance via Pickwick Road to the Co-op car park which had plenty of free spaces. Parking was free for two hours. I went into the Co-op supermarket which was quite large with a good range of day-to-day supplies. There was also a reasonable range of OTC medicines and baby products. The Co-op had opening hours from 7am to 10pm Monday to Saturday and from 10am until 4pm on Sundays. There were bus stops on the road by the Co-op, and I saw several buses (the 231) whilst in the town.
- 2.14 From there I walked to the High Street passing the former Boots pharmacy and other shops and services in the centre. There was another vacant property close to the Boots site on the opposite side of the street. The town was fairly quiet with few people in the Co-op or the shops near the Boots site, but the High Street was busier and two cafes there were fairly full.

- 2.15 *I then walked to Shaunaks Pharmacy and the Porch Surgery via Pickwick Road arriving at 11.30. The walk from the Co-op car park was generally on the level and took about 5 minutes each way. There were some free parking spaces outside the pharmacy including two spaces for disabled visitors. There were three steps to the pharmacy entrance on one side but step free access on the other side passing across the front of the surgery. The pharmacy was not large but there was a consulting room and seating for customers. Five people were waiting in line to be served at the time of my visit and there was one person browsing the shelves. Five staff were visible in the dispensary or behind the counter. Two more people entered during my visit. The pharmacy was busy, but people were apparently being dealt with efficiently.*
- 2.16 *Returning on foot to the Co-op car park I then drove to Box which took just under 10 minutes. Passing the surgery on the right I located the pharmacy on the left. There appeared to be nowhere in the immediate vicinity to park except perhaps a pub car park on the opposite side of the road (if permitted). The pharmacy appeared to be quite small and three chairs, presumably providing seating for customers, were set out on the pavement outside. There was no one using them.*
- 2.17 *Returning to Corsham I drove to the Rowden Hill pharmacy – a journey which also took about 10 minutes. The pharmacy was located next to the Rowden Hill surgery and adjacent to the Chippenham Community hospital. There was only one person in the pharmacy at the time of the visit. Unrestricted parking was available to the side of the pharmacy in a road which ended in a cul de sac. There were also free spaces at the surgery behind the pharmacy but there was a sign saying that parking was for the use of the practice's patients only.*

Committee member three, visit on 11 March 2025:

- 2.18 Member 3 has a blue badge and uses mobility aids.
- 2.19 *I drove into Corsham along Bath Road through residential areas and parked in the car park adjacent to the Springfield Leisure Complex. Parking was free for three hours. At the time of the visit, some spaces were cordoned off for maintenance work, leaving limited availability. However, there were two free disabled spaces available.*
- 2.20 *I crossed Beechfield Road to the Porch Surgery, which is adjacent to Shaunaks Pharmacy. The car park in front of the surgery and pharmacy had free spaces, including empty disabled bays.*
- 2.21 *The pharmacy was open but closes for lunch from 12:30 pm to 1:30 pm. Its regular opening hours are Monday to Friday – 9:00 am to 12:30 pm and 1:30 pm to 6:00 pm; Saturday – 9:00 am to 12:30 pm; closed on Sundays. At the time of my visit there were two people who appeared to be waiting for prescriptions to be dispensed.*
- 2.22 *Outside the pharmacy, there was a box for dropping off repeat prescription slips, and a notice advertising a free prescription delivery service. The notice stated that prescriptions take five days to supply. The pharmacy also had a Facebook page for regular updates, but no other services were advertised on the door.*
- 2.23 *There was a ramp providing step-free access to both the pharmacy and the surgery. A sign for the free prescription service was visible at the staff entrance at the back of the premises.*
- 2.24 *The pharmacy and surgery car park were connected to the car park for the former Corsham Family Health Centre, which is now boarded up. There was no signage directing patients to any alternative facility.*

- 2.25 *From the pharmacy, I walked along Pickwick Road, turned into Newland Road. The journey took over half an hour as frequent rest breaks were needed. The journey was downhill. There was a large Co-op supermarket with its own car park. Parking at the Co-op was free for two hours. The Co-op stocked a good range of everyday supplies, including over-the-counter medicines. It was open from 7:00 am to 10:00 pm (Monday to Saturday) and 10:00 am to 4:00 pm (Sunday).*
- 2.26 *The Mansion House bus stop near the Co-op in Corsham has several routes. The 231 and X31 go from Corsham to Bath and Chippenham via Box and Rudloe, every hour. The 10 route operates a town service within Corsham from 07:10 to 17:35 on weekdays, with intervals varying from 13 to 63 minutes depending on the time of day. The 69 route travels to Trowbridge via Melksham and Bradford-on-Avon. The X83 route goes to Lackham College via Corsham and Chippenham.*
- 2.27 *Around the perimeter of the car park there were shops and a restaurant. I continued on foot toward the site of the former Boots pharmacy, which was located in the pedestrian area of Martingate. The pedestrian area is lined with various small shops, including a hardware shop, a café/bar, a Ladbroke's, a rock distillery shop, charity shops, bakeries, and an art gallery and picture-framing shop.*
- 2.28 *There was a sign in the window of the former Boots site asking people to attend the appeals hearing. There was also a sign advising that the nearest Boots pharmacy is in Chippenham.*
- 2.29 *The pedestrian area slopes down to the High Street.*
- 2.30 *The High Street is pedestrianised almost up to Post Office Lane and features some high-end shops and services, including, a cosmetic dentist, and St. James Wealth Management. There was also an independent butcher, a post office, a tourist information centre, a hairdresser, an Oxfam shop, and the Royal Oak pub.*
- 2.31 *The majority of people walking along the High Street during my visit were elderly, and many of the advertised services appeared to cater to older customers.*
- 2.32 *I was unable to complete the return journey to the Leisure Centre on foot.*
- 2.33 *After leaving Corsham, I drove to Box Pharmacy, along Bath Road. There was a significant amount of new housing development along this road.*
- 2.34 *Box Surgery was on the right as I approached the village, and the pharmacy was located further along the road on the left. Parking was limited, with double yellow lines outside the pharmacy.*
- 2.35 *Returning to Corsham, I then drove to Rowden Hill Pharmacy, passing through a retail area along the A4. There was parking available on the road beside the pharmacy, and there were also free spaces at the surgery behind the pharmacy, but a sign indicated that parking was for patients only.*
- 3 A summary of the above observations was provided to those in attendance. They were invited to comment upon them **OR** indicate if any of the observations appeared to be inaccurate.
- 3.1 No such comments or observations were made.
- 4 **Oral Hearing Submissions**

- 4.1 The Chair indicated that there was no need to address the Committee on Regulation 31.

Mr N Koria (representing Careplus Pharmacy Ltd):

- 4.2 *'As the committee will be aware, the application put forward by our client centres around a number of key points following the closure of the Boots: - Capacity/ Queuing issues with the Shaunaks Pharmacy, the only remaining pharmacy in Corsham. Difficulty for those who share protected characteristics travelling to the Shaunaks Pharmacy, who were accustomed to accessing pharmaceutical provision in the town centre.*
- 4.3 *Lunch-time access to pharmaceutical provision Corsham is a rural town situated in Wiltshire, with the majority of amenities being situated within the town-centre. Corsham generally has an elderly population with 28% of residents over the age of 60. We highlight that a lot of Corsham itself is densely populated with the Corsham Ladbrook ward having a density of 2,100 residents per square kilometre and the Corsham Pickwick ward having a density of 1,100 residents per square kilometre. These are well in excess of the figures of 156 for Wiltshire and 433 for England. Thus, whilst Corsham may be in a rural setting, the town itself has a dense population. The amenities in Corsham not only serve residents of Corsham & Rudloe, but also those in neighbouring villages such as Neston, Gastard, and Lacock. Thus, those reliant on amenities, including pharmaceutical provision, is approaching 16,000 residents. Extrapolating this population figure allows us to conclude that Corsham currently only has an effective 6.25 pharmacies per 100,000 people – less than half the average for Wiltshire (13.3/100,000) and less than a third of the average for England (20.6/100,000). Thus, it is apparent that pharmaceutical provision is dire in Corsham.*
- 4.4 *Within Corsham town-centre there is a large Co-operative store where residents undertake their weekly shop; there is a Butchers; hairdressers; restaurants; Convenience Stores; Hardware shop; stationery shop; Chinese takeaway; Dry Cleaners; Domino's Pizza; Optician; Café; Bakery; and a number of other amenities. Corsham town-centre contains the vast majority of amenities that resident's access as part of their day-to-day lives. However, pharmaceutical provision is no longer present following the closure of the Boots in the Martingate Centre.*
- 4.5 *Following the closure of the Boots Pharmacy last year, residents have been forced to utilise the Shaunaks store which is situated away from the town-centre adjacent to the Porch Surgery. Consequently, Shaunaks now dispenses c.23,000 items in a small, cramped unit adjacent to the surgery. For those familiar with pharmacy numbers, this puts the Shaunaks as one of the largest pharmacies in the UK dispensing triple the average number of items. Unsurprisingly, the Shaunaks is simply unable to cope with the pressures placed upon it.*
- 4.6 *It is worth highlighting that contrary to Shaunaks representations, the Shaunaks Pharmacy is not located in Corsham town centre. [Referred to a map] which demarks the town centre boundaries per the local plan consultation. Our client proposes to re-open a pharmacy within the Martingate centre in the town and has received support from the Landlord as per correspondence that was circulated prior to the hearing, for the two current vacant units here. Both units are approximately 30 metres from the Co-operative store and Newlands Road Car Park which is free for two hours, with 10 blue-badge spaces. Also, both units are approximately 50 metres from the Newlands Road Co-op bus stop – the main town centre bus stop – which serves the 10,68,69,231,636,X31 buses.*
- 4.7 *Whilst the issues faced by Corsham residents were apparent to our client as well as local residents, a number of local parties raised the issue of a lack of evidence. In order to evidence the issues faced by local residents, we sought to obtain letters of lived*

experiences from local residents. In order to do this, we posted .. in local facebook groups,...

- 4.8 *Shaunaks appear to take issue with this post for the prompts given. Examples of difficulties residents may have faced were given as not all, particularly regular pharmacy users, are able to articulate their thoughts well in written form. It is of note that residents were not forced to write in and produced written emails of their own accord. Notably the responses were much more in-depth; wide-ranging; and differing than the prompts provided. Ultimately these are lived experiences that were written by people in their own time and in their own words – templates were not provided as claimed by Shaunaks. It will be up to the Committee to form their own opinions on this methodology of obtaining evidence, but we are unsure as to how else this could be done.*
- 4.9 *We submit that surveys are in-fact more directive than the post above and have been accepted many times previously. Shaunaks also have taken issue with the timing of the emails, which were ultimately in response to a call for evidence from a number of parties. Regardless, NHS Resolution accepted this evidence and allowed interested parties an additional 26 days to respond, under their powers under Schedule 3, part 3, paragraph 7 of the regulations. Given, NHS Resolution have accepted this evidence we are unsure why Shaunaks have simply ignored it.*
- 4.10 *Over the course of a month from the 12th October to 18th November a staggering 427 emails were received highlighting issues that residents had been facing with pharmaceutical provision in Corsham. Notably, the Boots closed 7 months prior to these emails giving Shaunaks plenty of time to acclimatise to the change, however, this has not been the case as one pharmacy is fundamentally insufficient to serve a population the size of Corsham. Notably, these letters are not in isolation with evidence previously provided of a separate petition to save the Boots from closure obtaining over 450 signatures.*
- 4.11 *We also note that The Health & Wellbeing Board, authors of the PNA, are also supportive and this application. Corsham Town Council have been vocal throughout on issues faced by residents and excessive waits endured by carers. We ask the Committee to visualise a carer popping out for 10 minutes to collect a prescription. The elderly resident may be sat down watching TV, and in next to no-time the carer will be back alongside the resident. Now imagine the scenario where said carer now has to leave for 40 minutes to collect a prescription. This has now become a not insignificant period of time that the vulnerable resident has been left alone for. Should this vulnerable resident get up to go to the toilet whilst the carer is collecting their prescription, this could cause them to slip and fall; causing potentially life threatening injuries. This is not a farfetched scenario when we consider prescriptions may have to be collected on a weekly basis. This is even more pertinent in the case of Corsham where 28% of the population are aged over 60, so this is a more likely occurrence. As a consultancy practice who have completed a number of applications on behalf of clients, and are well aware the increased difficulty posed in obtaining letters opposed to survey results. We have previously taken applications to appeal, where Committees have decided that c. 40 emails were deemed sufficient evidence to grant an application. Thus, to receive over 10 times this number of emails detailing such a large amount of adverse experiences within a month highlights just how dire the situation is for Corsham residents. We also suppose that the Committee in their experiences would not often see such a substantial body of evidence presented for market entry applications....*
- 4.12 *Generally summarizing these letters and the experiences of residents we can see the issues raised with the provision at Shaunaks Pharmacy. Error in prescription causing patient to take the wrong product Dispensing the wrong number of tablets Lack of parking as car park is small and shared with Porch Surgery Lack of disabled parking,*

due to busy car park 2 weeks to wait for a prescription to be made-up Queues outside the door into the car park Queuing outside in the rain Queues of 10/12 people long A Bouncer, who has been hired to manage the queues Unable to provide medication resulting in trip to A&E Staff who are “drowning” under the demand Limited space inside the shop No privacy in consultation room, given the large volume of patients cramped into the small space Concerns surrounding infections given proximity of patients within the store Closed during lunch Residents having to get taxis to access the premises, only to be turned away Unreliable delivery service - Delivering incorrect medication Clearly Shaunaks is struggling even to the point of providing incorrect medication.

- 4.13 We submit that this clearly is not representative of reasonable choice to provision. A lot of experiences were received and just highlighting a few to give the committee an insight into some of these issues: ... a retired Doctor from the Porch Surgery (the surgery adjacent to Shaunaks) writes ‘The issues with queueing outside in the rain; the small premises size; the difficulty with bus journeys to Box and Chippenham; and even admissions from a retired Doctor from the Porch Surgery highlighting the need for a town-centre pharmacy’.
- 4.14 There are many more emails highlighting personal stories and the difficulty that people face, and frankly I could go on forever. We do trust that the Committee have read these emails in full. Due to the sheer number of complaints, we categorised complaints from various emails into sections. 250 emails highlighted the issues with long queues, often out the door, and sometimes in inclement weather. 62 emails highlighted the capacity issue of the Shaunaks due to the small premises and growing population 16 emails highlighted the difficulty in accessing alternative services by bus, with elderly residents having to get taxis to access the Shaunaks 21 emails highlighted the difficulty of the walk between the Shaunaks and the town centre 26 emails highlighted the difficulty in parking at the Shaunaks site as well as the lack of blue badge spaces 31 emails highlighted the difficulty in now combining pharmaceutical provision within the course of resident’s daily lives 9 emails highlighted the difficulty of lunchtime pharmaceutical access 100 emails highlighted the deterioration in service levels following the closure of the Boots.
- 4.15 As discussed above, the majority of residents highlighted the long queues outside of Shaunaks, and sometimes having to queue outside in the cold or rain as the primary issue. We submit that this is clearly not representative of reasonable choice to provision. A good number of emails highlight the lack of parking at the Shaunaks and the lack of blue badge spaces. To reiterate, the Martingate centre has 10 blue-badge spaces. Another notes how Shaunak’s has been struggling even prior to the closure of the Boots...
- 4.16 Quoting verbatim..... Thus, it is unsurprising that the closure of the Boots appears to have tipped the Shaunaks over the edge. Approximately 15% of emails directly address capacity issues with one citing: “There is no privacy because of the queues if you need to ask the pharmacist about something or go in the tiny “private” room where everyone stood outside in the queue can hear everything.” ... A handful of emails cited the need for lunchtime opening. Notably, our client proposes lunch-time core opening hours, with the nearest pharmacy to do being the Allied in Chippenham. A good number of residents also highlighted the difficulties by foot and bus they now face in accessing pharmaceutical provision. With one resident highlighting: “I am disabled and cannot walk far or stand long. when we had boots in high street it was perfect now only shawnuk [sic] way to far.”.. “I know of several elderly people who live in accommodation close to the town centre, who struggle to walk the distance from their homes to Shaunaks...” ... Whilst the journey to the Shaunaks to the town centre may be ok for those who are mobile. Those with mobility issues, especially who live near the town-centre will find the journey to Shaunaks difficult by foot. As has previously been

discussed, Corsham and the surrounding areas as a whole are generally of better health and better mobility despite being elderly.

- 4.17 However, this is not the case for the localised population who would have been more significantly impacted by the closure of the Boots Pharmacy. Residents of the 018F LSOA (The LSOA of the proposed site): - - - 23.3% do not have access to a car opposed to 23.5% for England 6.7% have bad/ very bad health opposed to 5.2% for England 21.9% are disabled under the Equality Act opposed to 17.3% for England 21.3% are aged over 65 compared to 18.3% for England We can see that within Corsham town centre, there is an elderly population with greater disability and worse health outcomes. It is evident that the Boots closure has detrimentally impacted these groups.
- 4.18 It has been suggested that these groups obtain the bus to alternative pharmacies, however, the bus services are not great to alternative pharmacies. To the Shaunaks Pharmacy Residents could obtain the X31 bus, however this is hourly and infrequent. The bus stop is still 0.2 miles from the Shaunaks site. Also, for those not living on Corsham's main roads the 231 bus will have to be taken to catch an X31 connection to get to the Shaunaks. Given the 231 bus is also infrequent at every 30 minutes, return journeys could be spent upwards of an hour waiting for any given bus. We submit that this is not representative of reasonable choice or access to provision. To Box Pharmacy Box Pharmacy is served by the 231 bus which we know frequents every 30 minutes, and the X31 bus which we know frequents hourly. The X31 arrives within 9 minutes of the 231, so there will still be a 30-, 21-, or 9- minute wait depending on the time of day. The actual journey is 15 minutes. The Committee may have observed that Box Pharmacy is served by narrow pavement along the busy A4 road to Bath. This is dangerous especially for those who share protected characteristics. We also note that there is no crossing to the other side of the road, and cars come from a blind corner with no dropped kerb which could be a trip hazard. For the elderly or infirm it is dangerous to cross to catch a return bus. We also highlight that the last X31 bus leaves the Newlands Co-op bus stop at 16:08 so pharmaceutical services cannot be accessed later in the day. To Allied Pharmacy, Hathaway Medical Patients still have a 0.5-mile journey in addition to the bus so will be accessible for those likely to utilise the bus. (231) To Rowden Hill Pharmacy The X31 goes to Rowden Hill Pharmacy but is hourly and takes 16 minutes. Again, the majority of residents need to reach the town-centre first to catch the X31 bus. Or residents could take the 231 and X34 bus combined which frequents hourly. Based on schedules, residents still need to wait 40-minutes or 20-minutes to catch a bus to Rowden Hill Pharmacy. Also, on a return journey the X34 bus is not available. For residents unable to walk 0.8 miles to catch the 231 bus back to Corsham, they would have to wait an hour for the X31 bus back - we do not believe this is representative of reasonable choice and is particularly precarious when considering two buses need to be relied upon together. To Boots, Chippenham This is a 33-minute bus journey away via the 231 bus, however, the bus only frequents hourly to this location. We do not consider this as representing reasonable choice.
- 4.19 We can see that bus journeys to alternative pharmacies often involve extensive waits for buses that can be at least 30 minutes in all cases. Additionally, there are safety concerns particularly with Box Pharmacy. The inadequacy of bus services to alternative pharmacies was also highlighted by a number of residents who wrote in: "I find it a much longer walk from my home in the traditional town centre to get to Shaunaks on Beechfield Road. As I get older this is more important. Although I could use a bus to help with this the service is not frequent and I'd have to wait for the return journey." .."Many people who rely on public transport cannot access the existing pharmacy easily, whereas a number of buses stop in the centre of town on Newlands Road." ... So we know that there are clear capacity issues at the Shaunaks, and the localised population who are elderly, of worse health, and may be without a car have little alternative following the closure of the Boots. Again, this representative of 'no choice'

much less than the threshold of reasonable choice. It is noted how a number of buses stop at the Newlands Road Co-operative bus stop near our client's proposed site. I also just want to highlight that alternative provision is still quite far, given residents access their day-day amenities within Corsham: - Box Pharmacy – 3.5 miles - - Rowden Hill Pharmacy – 3.5 miles Hathaway Medical Centre Pharmacy – 3.8 miles Boots Chippenham – 4.2 miles.

- 4.20 *The Lloyds Pharmacy in Sainsburys in Chippenham was 2.5 miles away, however this pharmacy also closed in April 2023. It was dispensing 2,500 items at the time and would have contributed to further strains on the local pharmaceutical network.*
- 4.21 *Finally, just want to add that Shaunaks have submitted an FOI from the ICB highlighting how they were unaware of any sporadic closures from the Boots. Whilst the ICB may not have recorded any closures, this does not necessarily mean that did not happen. As a consultancy practice, we are currently working on application where a contractor had over 100 instances of closure, which has now been admitted to by the Contractor, without the ICB knowing. In this scenario, our understanding is that the Boots Pharmacy did occasionally close due to lack of Pharmacist cover – this goes some way to explain why the Boots was under-utilised in comparison to the Shaunaks. It is less likely that an independent operator will have this struggle.*
- 4.22 *Conclusion From the substantial evidence presented it is hard to ignore the lived experiences of a number of residents who have gone into the details into the struggles they now face. Shaunaks Pharmacy has been tipped over the edge by the closure of the Boots store; owing to the high dispensing volumes it processes and its small premises. Alternative provision is difficult to access for those without a car and who share protected characteristics. These residents may find difficulty in walking to the Shaunaks and bus services are infrequent and onerous. We submit that there is no longer reasonable choice to pharmaceutical provision and there is a need for a pharmacy within Corsham town centre that residents can access along with their daily amenities.'*
- 4.23 In response to questions Mr Koria confirmed that his clients operated a pharmacy in Watford. He did not know if and when they had visited Corsham. He confirmed that no supplementary or core hours had been offered for Saturday mornings. He thought that as independent contractors if there was a demand, they would respond to that need. He believed that following the closure of the Lloyds pharmacy at Sainsburys and the closure of Boots, Shaunaks had absorbed between 2,500 to 3,000 extra prescriptions.
- 4.24 In his final submission, Mr Koria said that his clients had initially received a low level of response to calls for evidence because the local residents thought it was a scam to obtain their email addresses. However, there had been a number of unsolicited responses from local residents who had found out about the process. Once the residents had realised it was not a scam, they had engaged with the survey. There had also been a local residents' campaign not associated with his clients.
- 4.25 There was no evidence of harassment by his clients in obtaining information from the patients of Shaunaks pharmacy and this was denied. Mr Koria reiterated that there was not a reasonable bus service to connect Shaunaks pharmacy to the town centre. There was a large body of evidence demonstrating the difficulty with the service at Shaunaks pharmacy, including, error in prescriptions, lack of car parking and failure to dispense prescriptions on time. Mr Koria was not sure if there was a bouncer hired or not, but a lot of residents had mentioned this.
- 4.26 Mr Koria pointed out that Shaunaks pharmacy were relying on a planned vending machine and a delivery service, both of which were not contracted services and could be withdrawn at any time. He did not doubt that Shaunaks pharmacy did a good job,

but they didn't have the capacity to handle the large volumes of prescriptions dispensed. There were only alternative pharmacies if patients had access to a car and if they did not, it would be very difficult for them to access any other pharmacy.

Mr Daly (representing Shaunaks pharmacy)

- 4.27 Mr Daly submitted the following points: *'The town centre is very quiet and not well used (refer to site visit photos) Cobbled streets and parking locations mean those who are mobility impaired would find Shaunaks easier to access. Quiet village feel.*
- 4.28 *Chippenham to the east is the main shopping area and contains multiple pharmacies. Hearsay from local people was that they did not know why Boots closed, but did not use it anyway apart from one person who mentioned Boots products / offers were good. Boots was very quiet. If Shaunaks were struggling before Boots closure (as claimed) then this would not have been the case. Applicant claims Boots was often closed due to no pharmacist being available but has no evidence to support this. NHS data says closures did not happen.*
- 4.29 *Complaints: Serious doubts about veracity of complaints. For 6 months only 4 letters were received. Then a campaign started against my client telling patients what they should complain about and suggesting specific things to complain about. Patients were approached outside Shaunaks and asked to complain. Patients and staff felt harassed.*
- 4.30 *Shaunaks is not struggling. Provides all services and is a high provider of these services: 395 staffing hours, 3 pharmacists (1 part time), 8 dispensers, 3 counter assistants and 2 delivery drivers deliver approx. 50% of all prescriptions. Staffing hours increased approximately 20% in last 15 months, mainly to provide more services and only a small amount of that due to increased workload from Boots closure.*
- 4.31 *Pharmacies that cannot cope typically reduce service provision and focus on dispensing. Shaunaks increasing service provision. Approximately 50% of all Shaunaks items are delivered to patients. Approx another 200 items made up at central hub for nursing home patients. Less than half of prescriptions are actually collected from the pharmacy premises.*
- 4.32 *Reasonable Choice: Dispensing data shows patients use a variety of pharmacies. Shaunaks dispenses items for other surgeries outside Corsham. Likewise pharmacies outside Corsham dispense to Corsham patients. Car ownership much higher than average. Bus routes to all pharmacies – some of which the Applicant simply ignored. Rural area where residents expect to travel for services, but here they already have a pharmacy in the town with others accessible within 10 minutes by car or 30 mins by public transport should they choose to use them'.*
- 4.33 In response to questions, Mr Shaunak said he did not have personal knowledge of the harassment of patients at the pharmacy, it had been reported to him by the teams at the pharmacy. He believed it happened on several occasions.
- 4.34 Mr Shaunak said the accusation was that the pharmacy was poorly run. However, they continued to provide an exemplary service and that was why people preferred his pharmacy to Boots.
- 4.35 Mr Daly agreed that the number of prescriptions dispensed had tripled. But disagreed that this should show an increase in non-dispensing services at a similar level. Mr Daly said that it was the level of demand which limited the number of services that could be offered. There was not a simplistic rule that if this went up by 50%, everything else went up by 50%.

- 4.36 Mr Daly said that there were massive problems across the country getting engagement with Pharmacy First. And there had been only 10% to 15% of the first year's budget spent. He said there was no evidence that they could not meet the demands of Pharmacy First.
- 4.37 When asked about the profit margins for services other than dispensing services, Mr Daly remarked that services were not provided for free, you still had to fund a pharmacist to deliver them.
- 4.38 Mr Daly was concerned that the letters accompanying the requests for responses had been leading respondents as to what they should say.
- 4.39 Mr Shaunak said they had 265 to 267 responses to their patient satisfaction survey. This was undertaken in September of 2024. The forms were collected from the pharmacy and returned to the pharmacy at the patients' leisure. This was conducted over a couple of months. Responses were very positive about the service offered.
- 4.40 Mr Shaunak said there were two consultation rooms, one to the right of the pharmacy and one to the left of the pharmacy. He said they also carry out telephone consultations for patients who prefer this to face to face discussions. He said there were two pharmacists on duty in the pharmacy at any one time.
- 4.41 Mr Shaunak said his pharmacy had no additional prescriptions after Lloyds closed and probably 1500 to 2000 after Boots closed. Some of the items dispensed by Boots related to nursing homes, so not all were for people in Corsham. He suspected that when Lloyds closed, people would actually have transferred to a pharmacy in Chippenham because it was closer to Chippenham.
- 4.42 Mr Shaunak said that there was little additional traffic in the area around the pharmacy because of the volume of prescriptions that were delivered. He said that the pharmacy was part of a pharmacy group, and it was possible to order on the website for the whole group. He said this was advertised on prescription bags and promoted free delivery to everyone, no matter who they were.
- 4.43 Mr Shaunak said that not many pharmacies still operated a full delivery service. However, they had two vehicles and two drivers and delivered from the pharmacy. The drivers lived in the community and knew the community well. He agreed it was a non-contractual service, but he said it was vital to his patients. He said they had a planning application for a 24 hour/7 day a week vending machine, but this was not yet installed. It was planned to install vending machines at three of the pharmacies across the group.
- 4.44 In his final submission, Mr Daly said that Corsham has a pharmacy service, and it offered a high level of service. He argued that the pharmacy should not be punished for doing so well. They had proper and adequate staffing. The pharmacy serves Corsham and together with other pharmacies in the surrounding area provides reasonable choice and easy accessibility.

5 Consideration

- 5.1 The Committee had before it the papers considered by the Commissioner, together with a plan of the area showing existing pharmacies and doctors' surgeries and the location of the proposed pharmacy.
- 5.2 It also had before it the responses to NHS Resolution's own statutory consultations.

- 5.3 The Committee had regard to the National Health Service (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013 ("the Regulations").

Regulation 31

- 5.4 The Committee first considered Regulation 31 of the Regulations which states:

(1) A routine or excepted application, other than a consolidation application, must be refused where paragraph (2) applies.

(2) This paragraph applies where -

(a) a person on the pharmaceutical list (which may or may not be the applicant) is providing or has undertaken to provide pharmaceutical services ("the existing services") from -

(i) the premises to which the application relates, or

(ii) adjacent premises; and

(b) NHS England is satisfied that it is reasonable to treat the services that the applicant proposes to provide as part of the same service as the existing services (and so the premises to which the application relates and the existing listed chemist premises should be treated as the same site).

- 5.5 The Committee noted the Commissioner determined that "There are no other contractors currently providing pharmaceutical services within the best estimate provided. The nearest pharmacy is 0.3 mile (Shaunaks Pharmacy, Porch Surgery) away.'
- 5.6 The Committee having regard to the above and noting no challenge on appeal was not required to refuse the application under the provisions of Regulation 31.
- 5.7 The Committee noted that, if the application were granted, the successful applicant would - in due course - have to notify the Commissioner of the precise location of its premises (in accordance with paragraph 31 of Schedule 2). Such a notification would be invalid (and the applicant would not be able to commence provision of services) if the location then provided would (had it been known now) have led to the application being refused under Regulation 31.

Regulation 18

- 5.8 The Committee noted that this was an application for "unforeseen benefits" and fell to be considered under the provisions of Regulation 18 which states:

"(1) If—

(a) NHS England receives a routine application and is required to determine whether it is satisfied that granting the application, or granting it in respect of some only of the services specified in it, would secure improvements, or better access, to pharmaceutical services, or pharmaceutical services of a specified type, in the area of the relevant HWB; and

- (b) *the improvements or better access that would be secured were or was not included in the relevant pharmaceutical needs assessment in accordance with paragraph 4 of Schedule 1,*

in determining whether it is satisfied as mentioned in section 129(2A) of the 2006 Act (regulations as to pharmaceutical services), NHS England must have regard to the matters set out in paragraph (2).

(2) *Those matters are—*

- (a) *whether it is satisfied that granting the application would cause significant detriment to—*
 - (i) *proper planning in respect of the provision of pharmaceutical services in the area of the relevant HWB, or*
 - (ii) *the arrangements NHS England has in place for the provision of pharmaceutical services in that area;*
- (b) *whether, notwithstanding that the improvements or better access were not included in the relevant pharmaceutical needs assessment, it is satisfied that, having regard in particular to the desirability of—*
 - (i) *there being a reasonable choice with regard to obtaining pharmaceutical services in the area of the relevant HWB (taking into account also NHS England's duties under sections 13I and 13P of the 2006 Act (duty as to patient choice and duty as respects variation in provision of health services)),*
 - (ii) *people who share a protected characteristic having access to services that meet specific needs for pharmaceutical services that, in the area of the relevant HWB, are difficult for them to access (taking into account also NHS England's duties under section 13G of the 2006 Act (duty as to reducing inequalities)), or*
 - (iii) *there being innovative approaches taken with regard to the delivery of pharmaceutical services (taking into account also NHS England's duties under section 13K of the 2006 Act (duty to promote innovation)),*

granting the application would confer significant benefits on persons in the area of the relevant HWB which were not foreseen when the relevant pharmaceutical needs assessment was published;
- (c) *whether it is satisfied that it would be desirable to consider, at the same time as the applicant's application, applications from other persons offering to secure the improvements or better access that the applicant is offering to secure;*
- (d) *whether it is satisfied that another application offering to secure the improvements or better access has been submitted to it, and it would be desirable to consider, at the same time as the applicant's application, that other application;*

- (e) *whether it is satisfied that an appeal relating to another application offering to secure the improvements or better access is pending, and it would be desirable to await the outcome of that appeal before considering the applicant's application;*
 - (f) *whether the application needs to be deferred or refused by virtue of any provision of Part 5 to 7.*
 - (g) *whether it is satisfied that the application presupposes that a gap in pharmaceutical services provision has been or is to be created—*
 - (i) *by the removal of chemist premises from a pharmaceutical list as a consequence of the grant of a consolidation application, and*
 - (ii) *since the last revision of the relevant HWB's pharmaceutical needs assessment other than by way of a supplementary statement.*
 - (3) *NHS England need only consider whether it is satisfied in accordance with paragraphs (2)(c) to (e) if it has reached at least a preliminary view (although this may change) that it is satisfied in accordance with paragraph (2)(b)."*
- 5.9 The Committee considered that Regulation 18(1)(a) was satisfied in that it was required to determine whether it was satisfied that granting the application, or granting it in respect of some only of the services specified in it, would secure improvements, or better access, to pharmaceutical services, or pharmaceutical services of a specified type, in the area of the relevant HWB
- 5.10 The Committee went on to consider whether Regulation 18(1)(b) was satisfied, i.e. whether the improvements or better access that would be secured if the application was granted were or was included in the Pharmaceutical Needs Assessment ("the PNA") in accordance with paragraph 4 of Schedule 1 of the Regulations.
- 5.11 Paragraph 4 of Schedule 1 requires the PNA to include: "a *statement of the pharmaceutical services that the HWB had identified (if it has) as services that are not provided in the area of the HWB but which the HWB is satisfied (a) **would** if they were provided....secure improvements or better access, to pharmaceutical services... (b) **would** if in specified future circumstances they were provided...secure future improvements or better access to pharmaceutical services...*" (emphasis added).
- 5.12 The Committee considered the PNA prepared by Wiltshire Health and Wellbeing Board, conscious that the document provides an analysis of the situation as it was assessed at the date of publication. The Committee bears in mind that, under Regulation 6(2), the body responsible for the PNA must make a revised assessment as soon as reasonably practicable (after identifying changes that have occurred that are relevant to the granting of applications) unless to do so appears to be a disproportionate response to those changes. Where it appears disproportionate, the responsible body may, but is not obliged to, issue a Supplementary Statement under Regulation 6(3). Such a statement then forms part of the PNA. The Committee noted that the PNA was published 8 September 2022 and that a supplementary statement had been issued on 24 May 2024.
- 5.13 The Committee noted that the improvements or better access that the Applicant was claiming would be secured by its application were not included in the relevant PNA in accordance with paragraph 4 of Schedule 1.

- 5.14 In order to be satisfied in accordance with Regulation 18(1), regard is to be had to those matters set out at 18(2). The Committee's consideration of the issues is set out below.

Regulation 18(2)(a)(i)

- 5.15 The Committee had regard to:

- “(a) *whether it is satisfied that granting the application would cause significant detriment to—*
- (i) *proper planning in respect of the provision of pharmaceutical services in the area of the relevant HWB*”

- 5.16 The Committee noted the Commissioner's comment in its decision report that, “*The ICB has no particular plans regarding pharmaceutical services in the area, so there can be no detriment to such plans. There has not been any suggestion from interested party responses that there would be significant detriment to the arrangements already in place.*”

- 5.17 The Committee noted that there was no dispute on the matter from other parties. On the basis of the information available, the Committee was not satisfied that, if the application were to be granted and the pharmacy to open, the ability of the Commissioner thereafter to plan for the provision of services would be affected in a significant way.

- 5.18 The Committee was therefore not satisfied that significant detriment to the proper planning of pharmaceutical services would result from a grant of the application.

Regulation 18(2)(a)(ii)

- 5.19 The Committee had regard to:

- “(a) *whether it is satisfied that granting the application would cause significant detriment to— ...*
- (ii) *the arrangements NHS England has in place for the provision of pharmaceutical services in that area*”

- 5.20 The Committee noted that none of the submissions included any evidence on this question and the Committee found no evidence to support a suggestion that if the application was to be granted, it would cause significant detriment to the arrangements NHS England has in place for pharmaceutical services in the area.

- 5.21 The Committee was therefore not satisfied that significant detriment to the arrangements currently in place for the provision of pharmaceutical services would result from a grant of the application.

- 5.22 In the absence of any significant detriment as described in Regulation 18(2)(a), the Committee was not obliged to refuse the application and went on to consider Regulation 18(2)(b).

Regulation 18(2)(b)

- 5.23 The Committee had regard to:

"(b) whether, notwithstanding that the improvements or better access were not included in the relevant pharmaceutical needs assessment, it is satisfied that, having regard in particular to the desirability of—

- (i) there being a reasonable choice with regard to obtaining pharmaceutical services in the area of the relevant HWB (taking into account also NHS England's duties under sections 13I and 13P of the 2006 Act (duty as to patient choice and duty as respects variation in provision of health services)),*
- (ii) people who share a protected characteristic having access to services that meet specific needs for pharmaceutical services that, in the area of the relevant HWB, are difficult for them to access (taking into account also NHS England's duties under section 13G of the 2006 Act (duty as to reducing inequalities)), or*
- (iii) there being innovative approaches taken with regard to the delivery of pharmaceutical services (taking into account also NHS England's duties under section 13K of the 2006 Act (duty to promote innovation)),*

granting the application would confer significant benefits on persons in the area of the relevant HWB which were not foreseen when the relevant pharmaceutical needs assessment was published"

Regulation 18(2)(b)(i) to (iii)

5.24 The Committee noted that one pharmacy in a locality could be sufficient to provide reasonable choice. The Committee also agreed with Community Pharmacy Swindon and Wiltshire that closure of a pharmacy does not automatically indicate a 'gap' in provision. However, the Committee noted that each application had to be decided on its facts.

5.25 The Committee noted that it had been suggested by the Applicant that the town centre/main commercial area of Corsham area now had no provision of pharmaceutical services. The Committee relied on the maps produced by Wiltshire Council as part of its Local Plan Consultation to determine what could be regarded as the town centre of Corsham. The Committee noted that the Shaunak's Pharmacy was outside of what could be regarded as the town centre, despite Shaunak's assertion that it was within the main commercial area. In addition to the evidence of the accepted boundaries of Corsham town centre, the Committee had observed that the area surrounding the Shaunak's pharmacy could not be regarded as part of the main commercial area. The main shopping area appeared to end well before the incline on the Pickwick Road (leading to the Shaunak's pharmacy) began. The area around the pharmacy was distinct in character being surrounded by the leisure centre, the fire station and residential areas. There was no obvious connection to the main town centre and the Committee concluded that the location of the pharmacy would be somewhat obscure to anyone unfamiliar with its location. The Committee noted the suggestion that Corsham had a 'quiet village feel' and the photographs submitted in support, but this was not born out by its own site inspection. The Committee had observed that the area described as the town centre in the published maps did indeed appear to be a town centre with the ability to access a full range of goods and services within that area and a population that used that centre. The Committee concluded that Shaunak's pharmacy was outside that area.

- 5.26 The Committee had not itself observed queues or a lack of capacity at the Shaunak's pharmacy on its site inspections but accepted that these inspections could only provide a snapshot of the available capacity at the time of the inspection.
- 5.27 The Committee also gave consideration to the responses received in response to the Applicant's Facebook posts and some unsolicited responses received. Regrettably the Facebook posts had not put forward open questions. Given the Applicant had no presence in the town, it appeared to the Committee that the only motivation for responding and emailing was a desire for an application to be granted. The Committee noted that over 400 responses had been received. It carefully considered each of the responses and the quality of the evidence contained in those responses.
- 5.28 It was clear that some of those who responded spoke of a desire for the convenience of a pharmacy in the town centre and some of a desire for retailers of cosmetic products. Other responses pointed to a lack of capacity but gave no detail as to the experience of the patient. These responses were discounted by the Committee.
- 5.29 However, what became clear from reading many of the detailed responses describing individual patient experiences was that there was evidence that prescriptions had not been filled on time and as a consequence there were queues at the pharmacy whilst patients waited for their prescriptions to be dispensed. From the responses, it appeared that queues often formed as a result of patients arriving at the pharmacy believing their prescriptions would be ready and then discovering that they had yet to be dispensed. The pharmacy staff were then having to dispense the prescriptions and this caused delay. The Committee had also received some evidence that the population of Corsham was expanding but the Committee concluded that this was not the cause of the difficulties experienced by patients at Shaunak's pharmacy, rather it was the inability to have dispensed the prescriptions within the timescale anticipated by patients.
- 5.30 The evidence of Shaunak's Pharmacy was that they offered a delivery service which they said delivered 50% of all prescriptions dispensed and overcame many of the perceived difficulties with physical access to the pharmacy. However, the Committee noted that there was a response from a patient who was told they could not sign up for the delivery service as it was at capacity and responses from existing patients spoke of delays in delivery due to the prescription not being ready or the delivery service not having capacity. It was noted by the Committee that the delivery service was non-contracted and therefore could be withdrawn or reduced at any point. The Committee also noted a report of a dispensing error. The Committee concluded that even if the delivery service was further expanded to deliver prescriptions to all those who required that service, it still required the capacity to cope with dispensing in the region of 21,000 prescriptions a month and deliver other contracted and non-contracted pharmacy services.
- 5.31 It was noted by the Committee that many of the respondents clearly had sympathy for the staff at Shaunaks, who they observed falling victim to the anger and frustration expressed by patients. Although the Committee had received positive evidence from Mr Shaunak as to the increased levels of staffing (now at two full time and one part time pharmacists, eight dispensing staff, three counter assistants and two delivery drivers), it was clear that he was not based full time at the pharmacy and relied on reports from his staff as to conditions there.
- 5.32 The Committee also noted that the Chief Executive of Corsham Town Council had confirmed that it had independently received complaints of the queues for prescriptions at Shaunak's pharmacy.

- 5.33 The Committee balanced these reports against the evidence given by Shaunak's. It also noted that there had been a satisfaction survey carried out by Shaunak's and whilst this was available for the patients to pick up, it appeared that the majority had been returned to the pharmacy staff by hand. Whilst the result was positive, the Committee noted that significant numbers of responses had been neutral to the questions posed and there was no detail as to reasoning behind those responses whether positive, negative or neutral. The Committee therefore had some difficulty in understanding the significance of some of the information disclosed.
- 5.34 The Committee noted that at the time the PNA was published, the town centre area of Corsham had the Boots pharmacy and a regular bus service to the Lloyds pharmacy at Sainsburys. Whilst each pharmacy had dispensed less than the national average of 7,000 prescriptions a month, the combined total of approximately 4,500 prescription items a month was a significant loss of capacity. In addition to the increased staffing levels, Shaunak's pharmacy was also investing in automated dispensing machines although it was not clear to the Committee on the evidence provided, when this would come on stream or what impact it would have on capacity to dispense, as it would only impact on the speed of delivery of prescriptions already dispensed by the pharmacists.
- 5.35 The Committee noted that in its own satisfaction survey the majority of Shaunak's patients were unaware of the complete range of pharmacy services offered. The Committee noted that Shaunak's pharmacy was dispensing a very high volume of prescriptions, some three times the national average, from what the Committee had observed as small premises. Balancing the evidence of Mr Shaunak, the increased staffing levels and Shaunak's client satisfaction survey, against the evidence it had received from the responses to the Applicant's Facebook posts and from the written evidence of the Corsham Town Council of complaints it had received, the Committee concluded that the existing pharmacy could not always cope with the level of demand in the area for dispensing services and further concluded this could impact on its ability to offer other contracted services and on patients' understanding and confidence in the availability of other pharmaceutical services at the site.
- 5.36 The Chief Executive of Corsham Town Council had written to support the application and had observed that whilst Corsham had a higher than national average access to a vehicle, 16% of Corsham residents did not and they were not well served by public transport. This was reflected in the detailed responses to the Applicant's Facebook posts who spoke of the difficulty they had in physically accessing either Shaunak's pharmacy or pharmacies in other locations.
- 5.37 The Committee noted that for those in Corsham town centre or surrounding areas, with access to a car, there would be limited difficulty in physically accessing Shaunak's pharmacy or pharmacies outside the Corsham area in other towns or villages. However, for those reliant on public transport or accessing on foot, the evidence suggested that there was not reasonable choice, as supported by the representations received which, for example, described the difficulties in accessing Shaunaks by bus in contrast to the ease of access to the town centre. This together with the Committee's finding that there were occasions when Shaunak's pharmacy could not cope with the level of demand, led the Committee to conclude that there was not reasonable choice.
- 5.38 Therefore, the Committee was satisfied that, having regard to there being a reasonable choice with regard to obtaining services, granting the application would confer significant benefits by way of physical access on persons.
- 5.39 In considering Regulation 18(2)(b)(ii) the Committee reminded itself that it was required to address itself to people who share a protected characteristic under the Equality Act 2010 (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation) having access to services

that meet specific needs for pharmaceutical services that, in the relevant area, are difficult for them to access. In considering 18(2)(b)(ii), the Committee noted that it had only received submissions in respect of those who had a physical disability.

- 5.40 The Committee had regard to these comments but noted that there was little reference to services that meet specific needs. The comments on access were general in nature and might apply to any persons as explained by the assessment as to the lack of reasonable access above. The Committee considered that there was not a robust body of evidence that enabled it to be satisfied that a pharmacy at the proposed site would convey significant benefits pursuant to Regulation 18(2)(b)(ii).
- 5.41 The Committee was therefore not satisfied that, having regard to the desirability of people who share a protected characteristic having access to services that meet specific needs for pharmaceutical services that are difficult for them to access, granting the application would confer significant benefits on such persons.
- 5.42 In considering Regulation 18(2)(b)(iii) the Committee had regard to the desirability of innovative approaches to the delivery of pharmaceutical services. In doing so, the Committee would consider whether there was something more over and above the usual delivery of pharmaceutical services that might be expected from all pharmacies, some 'added value' on offer at the location.
- 5.43 The Committee noted that the Applicant had not submitted any evidence that it was intending to offer any benefit by way of an innovative approach to the delivery of pharmacy services.
- 5.44 The Committee was not satisfied that, having regard to the desirability of there being innovative approaches taken with regard to the deliverability of pharmaceutical services, granting the application would confer significant benefits on persons.

Regulation 18(2)(b) generally

- 5.45 The Committee noted that the letter from the HWB, supported the application, identifying the plans to remain open from 9am to 6pm, Monday to Friday of particular significance. The Committee noted that some responses to the Applicant's survey had indicated that those employed in the town centre found it difficult to access pharmaceutical services as a result of Shaunak's pharmacy lunchtime closing. The Committee noted that in response to Shaunak's patient survey, only one person commented that the service was not available at a time required but this provided limited insight as presumably those who were in the pharmacy and able to collect the survey would be accessing at a time convenient to them. The Committee noted that it had limited information as to the number of patients who would be affected in this regard and as to whether this was a matter of convenience for those affected. Clearly the proposed opening hours would offer better access to pharmaceutical services for those working in the town centre and seeking to access pharmaceutical services at lunchtime.
- 5.46 However, the Committee was of the view that there was insufficient information provided to support a finding that pharmaceutical services are not currently provided at such times as needed and therefore it was not satisfied that, having regard to the desirability of there being a reasonable choice with regard to obtaining services, granting the application would confer significant benefits (in relation to opening hours) on persons.
- 5.47 The Committee has considered whether there are any other factors that would confer significant benefits on including patients who share protected characteristics. The Committee had regard to the need to eliminate discrimination and advance equality of

opportunity and foster good relations between these patients and those who do not share their protected characteristics.

- 5.48 The Committee was of the view that in accordance with Regulation 18(2)(b) the granting of this application would confer significant benefits on persons in the area of the HWB which were not foreseen when the PNA was published.

Other considerations

- 5.49 Having determined that Regulation 18(2)(b) had been satisfied, the Committee needed to have regard to Regulation 18(2)(c) to (e) and found that it was not aware of any other applications or appeals relating to the provision of pharmaceutical services in Corsham and that in any event it would not be desirable to consider any such appeals or applications before reaching a decision on the current application.

- 5.50 No deferral or refusal under Regulation 18(2)(f) was required in this case.

- 5.51 The Committee had regard to Regulation 18(2)(g) and found that the circumstances envisaged in that provision would not apply as no consolidation applications had been made in that area.

- 5.52 The Committee considered whether there were any further factors to be taken into account and concluded that there were not.

- 5.53 The Committee was satisfied that the information provided demonstrates that there is difficulty in accessing current pharmaceutical services such that a pharmacy at the proposed site would provide better access to pharmaceutical services.

- 5.54 The Committee had regard to Regulation 19(6) which states:

(6) If NHS England is satisfied as mentioned in regulation 18(2)(b), it may grant the application notwithstanding that the improvements or better access were or was not included in the relevant pharmaceutical needs assessment.

- 5.55 Pursuant to paragraph 9(1)(a) of Schedule 3 to the Regulations, the Committee may:

5.55.1 confirm the Commissioner's decision;

5.55.2 quash the Commissioner's decision and redetermine the application;

5.55.3 quash the Commissioner's decision and, if it considers that there should be a further notification to the parties to make representations, remit the matter to the Commissioner.

- 5.56 Given the findings above on choice, the Committee determined that the decision of the Commissioner must be quashed.

- 5.57 The Committee went on to consider whether there should be a further notification to the parties detailed at paragraph 19 of Schedule 2 of the Regulations to allow them to make representations if they so wished (in which case it would be appropriate to remit the matter to the Commissioner) or whether it was preferable for the Committee to redetermine the application.

- 5.58 The Committee noted that representations on Regulation 18 had been sought from parties by the Commissioner and representations had already been made by parties to the Commissioner in response. These had been circulated and seen by all parties as

part of the processing of the application by the Commissioner. The Committee further noted that when the appeal was circulated representations had been sought from parties on Regulation 18.

5.59 The Committee concluded that further notification under paragraph 19 of Schedule 2 would not be helpful in this case.

5.60 The Committee had regard to Regulation 50(1) which states:

Discontinuation of arrangements for the provision of pharmaceutical services by doctors

In circumstances where NHS England has arrangements (whether they were made under these Regulations or were made under or continued by virtue of the 2012 Regulations) with a dispensing doctor (D) to provide pharmaceutical services to a person (P), if...

D must terminate the provision of pharmaceutical services to P, subject to any postponement of the discontinuation by NHS England in accordance with paragraphs (2) to (6).

5.61 Regulation 50(3) states:

This paragraph applies where—

(a) NHS England grants a routine or excepted application, the result of which is the inclusion in a pharmaceutical list of pharmacy premises that are not already listed in relation to an NHS pharmacist; .

(b) the pharmacy premises to which that application relates are not distance selling premises but— .

(i) are in a controlled locality, or

(ii) are within 1.6 kilometres of a part of a controlled locality in which patients of a dispensing doctor reside and those patients are being provided with pharmaceutical services by that dispensing doctor; and

granting the routine or excepted application, in the opinion of NHS England, results in a significant change to the arrangements that are in place for the provision of pharmaceutical services (including by a person on a dispensing doctor list) or local pharmaceutical services in any part of a controlled locality.

5.62 Pursuant to paragraph 9(4)(a) of Schedule 3 to the Regulations, the Committee may:

5.62.1 confirm the Commissioner's decision;

5.62.2 substitute for that decision, any decision that the Commissioner could have taken when it took that decision

5.62.3 quash the Commissioner's decision and remit the matter to the Commissioner for it to redetermine the decision, subject to such directions as the Secretary of State considers appropriate.

- 5.63 As the proposed pharmacy is within 1.6 km of a controlled locality the impact on any dispensing patients must be considered, as the application has been granted. The Commissioner commented that the period of one month's gradualisation for those surgeries affected would be appropriate and that the following practices would have had appeal rights against any gradualisation decision had the application been granted: Jubilee Fields, Patford House Surgery and Boa & Melksham Health Centre. However, the Commissioner had not expressed a final view as it had not granted the application. It is therefore remitted back to the Commissioner to be determined.

6 DECISION

- 6.1 The Pharmacy Appeals Committee ("Committee"), appointed by NHS Resolution, quashes the decision of the Commissioner, for the reasons given above, and redetermines the application.
- 6.2 The Committee has considered whether the granting of the application would cause significant detriment to proper planning in respect of the provision of pharmaceutical services in the area covered by the HWB, or the arrangements in place for the provision of pharmaceutical services in that area and is not satisfied that it would;
- 6.3 The Committee determined that the application should be granted on the following basis:
- 6.3.1 In considering whether the granting of the application would confer significant benefits, the Committee determined that –
 - 6.3.1.1 there is not already a reasonable choice with regard to obtaining pharmaceutical services;
 - 6.3.1.2 there is no evidence of people sharing a protected characteristic having difficulty in accessing pharmaceutical services; and
 - 6.3.1.3 there is no evidence that innovative approaches would be taken with regard to the delivery of pharmaceutical services;
 - 6.3.2 Having taken these matters into account, the Committee is satisfied that granting the application would confer significant benefits as outlined above that would secure improvements or better access to pharmaceutical services.
- 6.4 The matter is remitted back to the Commissioner to consider gradualisation.

Committee Chair

ANNEX A**REF: SHA/26332**8th Floor
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London
E14 4PUTel: 020 3928 2000
Email: nhsr.appeals@nhs.net**APPEAL AGAINST BATH & NORTH EAST SOMERSET,
SWINDON AND WILTSHIRE ICB (THE COMMISSIONER)
DECISION TO REFUSE AN APPLICATION BY
CAREPLUS PHARMACY LTD FOR INCLUSION IN THE
PHARMACEUTICAL LIST OFFERING UNFORESEEN
BENEFITS UNDER REGULATION 18 AT THE MAIN
COMMERCIAL AREA WITHIN CORSHAM, SN13 0HL
(BEST ESTIMATE)****1 The Application**

By application dated 25 March 2024, Careplus Pharmacy Ltd (“the Applicant”) applied to the Commissioner for inclusion in the pharmaceutical list offering unforeseen benefits under Regulation 18 at the main commercial area within Corsham, SN13 0HL (best estimate). In support of the application it was stated:

In my/our view this application should not be refused pursuant to Regulation 31 for the following reasons

1.1 “N/A”

Information in support of the application

1.2 “Background

1.3 This application is in respect of opening up a new pharmacy in order to provide better access for patients requiring access to pharmaceutical services in Corsham, Rudloe, and the surrounding areas.

1.4 In particular, granting this application would introduce reasonable choice of pharmaceutical provision.

1.5 The best estimate of the proposed site we wish to open a new pharmacy is located within the main commercial area in Corsham. This is located in the heart of Corsham and is the same site as the recently closed Boots. We believe that the closure of the Boots (SN13 0HL) on 1st March 2024, has left a significant gap in pharmaceutical services. Hence, this application is offering unforeseen benefits not captured within the PNA.

1.6 Corsham has traditionally been served by two pharmacies: the recently closed Boots (SN13 0HL), and Shaunak’s Pharmacy (SN13 9DN). The closure of the Boots has left Corsham and the surrounding areas with just singular pharmaceutical provision.

1.7 Per 2021 Census data, Corsham and Rudloe house 13,751 residents. However, due to the rural nature of the surrounding areas, pharmaceutical provision in Corsham also serves surrounding villages such as Neston, Gastard, and Lacock to name a few. Thus, when assessing the population that utilise pharmaceutical services in Corsham, we can see that there are c. 16,000 residents reliant on pharmaceutical provision within Corsham.

1.8 Extrapolating this population figure allows us to conclude that Corsham currently only has an effective 6.25 pharmacies per 100,000 people – less than half the average for

Wiltshire (13.3/100,000) and less than a third of the average for England (20.6/100,000). Thus, it is apparent that pharmaceutical provision is dire in Corsham, and common sense alone would dictate that there is a requirement for another pharmacy.

- 1.9 We highlight that there has been much furore surrounding the closure of the Boots, with residents strongly petitioning for the need of a pharmacy in the local area. At the time of writing, 466 local residents had signed a petition in an attempt to save the recently closed Boots. It is clear that the closure of the Boots has left a significant gap in pharmaceutical services that this application proposes to fill.
- 1.10 We invite the committee to read the petition in full at: https://www.change.org/p/prevent-the-closure-of-boots-chemist-store-in-corsham?source_location=search-Google-Search [See pages 1 -4 of Appendix A for Committee]
- 1.11 Proposed Location
- 1.12 The proposed location is situated in the main commercial area in Corsham, which is the focal point of the community; where the vast majority of shops are situated; and the central hub for transport links.
- 1.13 The town-centre is home to convenience stores; a post office; restaurants; takeaways; a large Co-Operative; and many more shops which would be expected within a town-centre location. These are typical amenities that residents access as part of their daily lives; all well-served by wide well-lit pavements and good transport links. There is good access by foot, car, and public transport.
- 1.14 The only current pharmaceutical provision, Shaunak's Pharmacy, is situated away from the town centre and main transport links.
- 1.15 Map [See page 5 of Appendix A for Committee]
- 1.16 We can see from the map above that there is now only one pharmacy to serve a huge geographical area and reliant population. This is not representative of sufficient pharmaceutical access and choice.
- 1.17 Regulations
- 1.18 We are required by NHS England to address the overarching question in an Unforeseen Benefits application:
- 1.19 "Please describe the unforeseen benefit(s) that you are offering to secure and how it will secure improvements or better access to pharmaceutical services, or pharmaceutical services of a specified type in the HWB area".
- 1.20 When considering the above question, the provisions of Regulation 18(2)(b) should be noted:
 - 1.20.1 (b) whether, notwithstanding that the improvements or better access were not included in the relevant pharmaceutical needs assessment, it is satisfied that, having regard in particular to the desirability of—
 - 1.20.1.1 (i) there being a reasonable choice with regard to obtaining pharmaceutical services in the area of the relevant HWB (taking into account also the NHSCB's duties under sections 13I and 13P of the

2006 Act(b) (duty as to patient choice and duty as respects variation in provision of health services)),

1.20.1.2 (ii) people who share a protected characteristic having access to services that meet specific needs for pharmaceutical services that, in the area of the relevant HWB, are difficult for them to access (taking into account also the NHSCB's duties under section 13G of the 2006 Act(c) (duty as to reducing inequalities)), or

1.20.1.3 (iii) there being innovative approaches taken with regard to the delivery of pharmaceutical services (taking into account also the NHSCB's duties under section 13K of the 2006 Act(a) (duty to promote innovation)), granting the application would confer significant benefits on persons in the area of the relevant HWB which were not foreseen when the relevant pharmaceutical needs assessment was published;

1.21 We note that points on reasonable choice; protected characteristics; and innovation are desirable, however, they are merely supporting considerations when determining whether in fact the overarching test in regulation 18(2)(b) has been met: an application should be granted should it provide improvements or better access to pharmaceutical services, or pharmaceutical services of a specified type in the HWB's area.

1.22 We have addressed these regulations overleaf.

1.23 Population

1.24 Corsham has experienced rapid population growth in years of late. The 2021 census population of Corsham, estimated at 10,888, represents a 32% increase over the 2001 census. When we also consider the population of the surrounding villages, single pharmaceutical provision is simply inadequate to support such a large number of residents.

1.25 We also note that there has been lots of recent housing development within Corsham:

1.25.1 Potley Lane: 64 New Homes

1.25.2 Bradford Road: 170 New Homes

1.25.3 Copenacre: 100 New Homes

1.25.4 Bath & Portland Stoneworks: 39 New Homes

1.26 It is evident that the reliant population is growing and obvious that single pharmaceutical provision is incapable of serving such a large population adequately.

1.27 This is even more acute when we consider the age demographic within Corsham. As of the 2021 Census, 28% of residents in Corsham were aged 60 or over. When we compare this to the 24.4% average for England, we can see that Corsham is home to a disproportionate number of elderly residents, meaning health needs are greater. This is especially pertinent when we consider the rollout of Pharmacy First to aid the struggling primary care network. Corsham currently only has one GP practice and one Pharmacy that currently dispenses c. 21,000 items. With such poor GP coverage and such a high-volume dispensing pharmacy, it is difficult to see how Pharmacy First is being rolled out effectively. Granting this application would ease the pressures felt on the singular pharmacy and enable Pharmacy First to be rolled out adequately.

1.28 Patient Journeys

- 1.29 When considering securing better access, we must consider typical patient journeys, alongside how those who share protected characteristics find these journeys.
- 1.30 It is of note that Corsham is a very centralized town with almost all amenities situated in the town centre.
- 1.31 Thus, residents were accustomed to accessing the Boots pharmacy as part of their daily lives in the town-centre; some would have achieved this via public transport.
- 1.32 The recently closed Boots and the Proposed Site are well served by the following buses: 10, 231, 555, 69 Zig Zag, 636, X31. It is of note that Shaunak's pharmacy is only served by the 10, X31, 636 buses and even then, residents are still required to walk 0.2-miles from the bus stop to the pharmacy.
- 1.33 For the elderly, disabled, and infirm, such a walk does not represent adequate access or choice to pharmaceutical provision; especially when we consider these groups are likely to utilize public transport due to mobility issues. Whereas the Proposed Site is situated directly outside/ nearer to relevant bus stops, hence improving accessibility and choice to those groups who share protected characteristics.
- 1.34 We also note that current pharmaceutical provision is not served by the 231, 555, 69 Zig Zag buses.
- 1.35 For residents with limited mobility accustomed to utilising these bus services to access pharmaceutical provision, the closure of the Boots means that the only alternative pharmaceutical provision is in fact inaccessible. This is representative of no pharmaceutical choice at all, much less than the threshold of 'reasonable choice'. Granting this application would restore access and choice to pharmaceutical provision for these residents.
- 1.36 Opening Hours
- 1.37 When considering better access, we must also consider the current provision of opening hours, and the reasonable choice that patients have on each day of the week. We highlight to the Committee that the recently closed Boots upheld lunch opening provision for Corsham, Rudloe, and the surrounding areas.
- 1.38 We understand that Shaunak's Pharmacy currently offers weekday opening hours from 9 a.m. to 6 p.m. with lunchtime closures and has done for a number of years. Such opening hours do not in fact provide adequate pharmaceutical access for those accessing pharmaceutical services in relation with a visit to the GP. We understand that the local GP surgery, Porch Surgery, opens at 8 a.m. and closes at 6.30 p.m. Patients accessing the GP in early morning or in the evening currently have significant waits to access pharmaceutical provision. In the case of those accessing GP surgeries in the evening, these patients have to wait until at least the next morning to collect their medication. Clearly this does not represent sufficient pharmaceutical access and thus my client has committed to 8.30 a.m. core opening, and 6.30 p.m. core closing hours.
- 1.39 We also highlight that those who work full-time may be unable to access pharmaceutical provision outside of their lunch break. The recently closed Boots upheld lunchtime opening for Corsham and the surrounding areas, however, there is now a lack of lunchtime opening following the Boots closure. We believe that this lack of hours has created a gap in provision.
- 1.40 By granting this application, access and reasonable choice to pharmaceutical services during lunchtimes and GP opening hours will be significantly better.

- 1.41 Conclusion
- 1.42 In our view, the closure of the Boots Pharmacy, SN13 0HL, has left a significant gap in pharmaceutical services for Corsham, Rudloe, and the surrounding areas.
- 1.43 Granting this application would secure better access to pharmaceutical services, especially during lunchtimes and during GP opening hours. Those utilising the bus services would find the proposed pharmacy significantly more accessible than their current choices; particularly the elderly, disabled, and infirm. It would also introduce reasonable choice of a different pharmaceutical provider for those in the local area.
- 1.44 We would like to note that granting this application would not cause significant detriment to access of pharmaceutical services, as this application is seeking to fill a gap vacated by the Boots closure.
- 1.45 On the evidence outlined above, we believe that a new pharmacy contract should be granted.”

2 The Decision

The Commissioner considered and decided to refuse the application. The decision letter dated 29 August 2024 states:

- 2.1 “Bath and North East Somerset, Swindon and Wiltshire ICB has considered the above application and I am writing to confirm that it has been refused.
- 2.2 Please see the enclosed report for the full reasoning.
- 2.3 You have a right of appeal to the Secretary of State against Bath and North East Somerset, Swindon and Wiltshire ICB’s decision. Should you choose to appeal then you should either complete the online form available on the [NHS Resolution website](#) or send a concise and reasoned statement of the grounds for your appeal within 30 days of the date of this letter to nhsr.appeals@nhs.net or:
- 2.4 Primary Care Appeals, NHS Resolution, 8th Floor, 10 South Colonnade, Canary Wharf, London, E14 4PU.”

[Any reference to ‘Committee’ in this section is not to be confused with the Pharmacy Appeals Committee of NHS Resolution]

South West Pharmaceutical Services Regulations Committee Decision Report 1st August 2024

- 2.5 “Case Reference: CAS-294196-F6K9K4
- 2.6 Name of Applicant: Careplus Pharmacy Ltd
- 2.7 Application Type: Application for inclusion in a pharmaceutical list: routine application offering to secure unforeseen benefits
- 2.8 Address of proposed premises: Best Estimate Main commercial area within Corsham SN13 0HL
- 2.9 **The SW Committee noted:**
- 2.10 The application is for Unforeseen Benefit with a best estimate address in the main commercial area within Corsham, SN13 0HL (est).

2.11 There was a Boots Pharmacy at 22 Martingate, Corsham, SN13 0HL which closed on 9 March 2024 and a Lloyds in Sainsburys Pharmacy at Bath Road, Chippenham, SN14 0BJ which closed on 18 April 2023 - both closed under the Market Exit process.

2.12 The location is within 1.6Km of a controlled locality, with three dispensing practices having a small number of dispensing patients within 1.6km of the postcode provided.

2.13 **PRELIMINARY ISSUES**

2.14 Summary of the application:

2.15 The applicant is proposing to open Monday to Friday for 50 Core Hours.

2.16 The hours proposed are indicated below from section 3.1 and 3.2 of the application form:

2.17 Proposed core opening hours

Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Total
08:30 – 18:30	08:30 – 18:30	08:30 – 18:30	08:30 – 18:30	08:30 – 18:30			50

2.18 Total proposed opening hours

Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Total
08:30 – 18:30	08:30 – 18:30	08:30 – 18:30	08:30 – 18:30	08:30 – 18:30			50

2.19 The applicant proposes to provide Essential services, advanced services and enhanced services but NOT appliances at section 4 of the application form.

2.20 The applicant states a floor plan for the proposed pharmacy will follow as this is pending from the shop fitters.

2.21 The applicant provides supporting information with the application form describing the unforeseen benefit they are offering to secure, concluding:

2.22 “In our view, the closure of the Boots Pharmacy, SN13 0HL, has left a significant gap in pharmaceutical services for Corsham, Rudloe, and the surrounding areas.

2.23 Granting this application would secure better access to pharmaceutical services, especially during lunchtimes and during GP opening hours. Those utilising the bus services would find the proposed pharmacy significantly more accessible than their current choices; particularly the elderly, disabled, and infirm. It would also introduce reasonable choice of a different pharmaceutical provider for those in the local area.

2.24 We would like to note that granting this application would not cause significant detriment to access of pharmaceutical services, as this application is seeking to fill a gap vacated by the Boots closure.

- 2.25 On the evidence outlined above, we believe that a new pharmacy contract should be granted.”
- 2.26 **PUBLIC INVOLVEMENT / REPRESENTATIONS**
- 2.27 The SW Committee noted full details of the applicant’s proposals were notified to various parties in accordance with the Regulations.
- 2.28 Representations were received from:
- 2.29 **Corsham Town Council** confirmed they fully support the application and urges it to be approved, reflecting the closure of the Boots has had an adverse impact on residents and in particular those older and more vulnerable members of the community. They have reflected that this would provide choice, increase access, which would reduce waiting and queuing times, especially for those with particular needs.
- 2.30 “The loss of Boots has adversely impacted on the standard of service provided by the only other pharmacy in Corsham. We have received complaints about queuing and waiting times to pick up prescriptions, which is frustrating for those in need of caring for others.”
- 2.31 **Community Pharmacy Swindon & Wiltshire** have made a number of observations regarding the application, commenting that to access the current pharmacy from bus transport, residents would have to walk 0.2 mile further. They have also included a note that there is currently intense pressure on recruitment and the funding model for Community Pharmacy being predicated on reducing the ‘clustering’ of pharmacies on Premises, concluding:
- 2.32 “We are of the view that this application does not meet the required criteria for ‘unforeseen benefits’ detailed in the regulations.”
- 2.33 **Shaunaks** assert that the applicant has failed to evidence the key issues in any meaningful way. Their response covers a range of matters regarding the population, opening hours and service provision. They reflect that a closure does not automatically mean a gap has been created and that the PNA has not been updated or a supplementary statement issued. They also reflect on the average dispensing volume of the closing site and that they are 0.3 miles from the proposed location/closed site and 0.2 miles from the bus stop. They note that distance selling pharmacies also help to provide choice for patients, referencing the Competition and Marketing Authority decision in relation to a recent merger. In addition, they have clarified there is ample free parking and that they also provide a collection and delivery service. Finally, they highlight that many of the commercial units within the best estimate are further from a bus stop than their pharmacy in Corsham.
- 2.34 “We conclude that there is already reasonable choice of pharmaceutical provision in Corsham and those who have protected characteristics already have sufficient access.
- 2.35 We are unaware of any complaints regarding service delivery by Shaunaks Corsham and are also unaware of any need for extended hours weekday opening.”
- 2.36 A late response was received from Wiltshire Public Health team noting that they welcome the application:
- 2.37 “The Wiltshire Health and Wellbeing Board welcomes the application by Careplus Pharmacy Ltd, noting a new provider offers additional pharmaceutical provisions, providing an improved choice of community pharmacy to our residents in Corsham. This will complement the existing community pharmacies. Additionally, the good spread

of opening hours including lunchtimes would enhance our residents' access to pharmaceutical services. Although no gap identified in our current Pharmaceutical Needs Assessment in the Corsham area, the Wiltshire Health and Wellbeing Board welcomes an supports this although would also particularly welcome any possible expansion of an advanced and enhanced services offer, which would further benefit the community in Corsham."

- 2.38 Six unsolicited comments were received in favour of the application. The common themes from these comments were that the remaining pharmacy was unable to cope with demand with queues being experienced, that there has been population growth locally, the closure of two pharmacies in recent years and that access is therefore particularly difficult for the elderly/those with mobility problems. It was noted the SW CCHub Pharmacy Team work with remaining pharmacies following a market exit, to ensure providers have planned for additional demand. Given the six concerns raised, it was agreed the Pharmacy Team should raised this with Shaunaks Pharmacy as an operational issue.
- 2.39 In their response to the representations, the applicant addresses some of the views expressed within the consultation response concluding:
- 2.40 "In conclusion, granting this application would secure better access and improvements to pharmaceutical services for residents of Corsham and the surrounding villages.
- 2.41 There is a need for another pharmacy is Corsham when we consider the poor access to alternative pharmaceutical provision; the elderly population; and the poor access to a car/van for some residents. It is clear that having one pharmacy to serve such a large reliant population is not representative of adequate pharmaceutical choice.
- 2.42 Granting this application would provide reasonable choice to a different pharmaceutical network.
- 2.43 Hence, regulation 18 has been met and this application should be granted."
- 2.44 Two further responses were received when the 14-day circulation of the consultation responses was undertaken. One from Corsham Town Council, who continue to support the application, urge for the PNA to be updated and reflect on the other responses. The other from Community Pharmacy Swindon & Wiltshire who reflect uncertainty regarding where the unsolicited comments come from.
- 2.45 When comments are circulated to the applicant and interested parties the covering letter states:
- 2.46 *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.*
- 2.47 **The SW Committee was satisfied that it is not necessary to hold an oral hearing to determine the application.**
- 2.48 Regulation 31 (same or adjacent premises) [Quoted in full].
- 2.49 There are no other contractors currently providing pharmaceutical services within the best estimate provided. The nearest pharmacy is 0.3 mile (Shaunaks Pharmacy, Porch Surgery) away.

- 2.50 **The SW Committee was as satisfied it was not required to refuse the application by virtue of Regulation 31.**
- 2.51 **CONTROLLED LOCALITY ISSUES**
- 2.52 The location for the proposed pharmacy is not in a controlled locality but is within 1.6 Km of a controlled locality.
- 2.53 **UNFORESEEN BENEFITS**
- 2.54 Reg 18(1)(b) – Improvements or better access not included in the Pharmaceutical Needs Assessment
- 2.55 Regulation 18 concerns ‘Unforeseen Benefits’ applications, which are applications where the improvements or better access that would be secured were or was not included in the relevant PNA. The current Wiltshire PNA can be found here: https://www.wiltshire.gov.uk/media/9936/Wiltshire-Pharmaceutical-Needs-Assessment-2022-2025/pdf/Wiltshire_Pharmaceutical_Needs_Assessment_2022-25_Aug_2022_UPDATE_FINAL.pdf?m=1665069661113 Annex 1E summarises the pharmaceutical services provision in the Corsham area (Pages 59-60).
- 2.56 The overall conclusion at the time the PNA was written can be found on page 6 with further detail on pages 48-49; no gaps were highlighted for Wiltshire:
- 2.57 “Conclusion
- 2.58 Taking into account local demography and the provision of pharmaceutical services in Wiltshire, it is evident that there is adequate provision of such facilities. Services are accessible in a range of locations and in a variety of set ups.
- 2.59 Each locality area has at least one community pharmacy within it, and the opening hours of these pharmacies generally reflect the population density. Although there is no requirement in the regulations around future service needs, there are some potential population changes anticipated during the lifetime of the PNA in regard to the relocation of military personnel and family, changes in primary care provision (actual and potential) and anticipated population changes due to housing expansion in Wiltshire and South Swindon.”
- 2.60 There has been 1 Supplementary statement to the PNA issued – this was issued in May 2024 and relates to the closure of Boots in Warminster on 27/10/2023.
- 2.61 The applicant states within the supporting information that their application addresses the regulations in light of population growth/age demographics, access/distance from nearest bus stop and opening hours concluding:
- 2.62 “In our view, the closure of the Boots Pharmacy, SN13 0HL, has left a significant gap in pharmaceutical services for Corsham, Rudloe, and the surrounding areas.
- 2.63 Granting this application would secure better access to pharmaceutical services, especially during lunchtimes and during GP opening hours. Those utilising the bus services would find the proposed pharmacy significantly more accessible than their current choices; particularly the elderly, disabled, and infirm. It would also introduce reasonable choice of a different pharmaceutical provider for those in the local area.
- 2.64 We would like to note that granting this application would not cause significant detriment to access of pharmaceutical services, as this application is seeking to fill a gap vacated by the Boots closure.

- 2.65 On the evidence outlined above, we believe that a new pharmacy contract should be granted.”
- 2.66 **The SW Committee was satisfied that as the improvements or better access which the applicant is proposing to secure were not identified in the PNA, an ‘unforeseen benefits’ application is the correct type of application.**
- 2.67 Reg 18(2)(a) – Would granting the application cause significant detriment to the proper planning or arrangements in place for provision of pharmaceutical services in this area
- 2.68 The ICB has no particular plans regarding pharmaceutical services in the area, so there can no detriment to such plans. There has not been any suggestion from interested party responses that there would be significant detriment to the arrangements already in place.
- 2.69 **The SW Committee was satisfied that granting the application would not cause significant detriment to the proper planning or arrangements in place for provision of pharmaceutical services**
- 2.70 Regulation 18(2)(g) – Whether the application presupposes that a gap in pharmaceutical services provision has been or is to be created as a result of a consolidation application
- 2.71 As no consolidation applications have been made relating to this part of Wiltshire the **SW Committee was not required to refuse the application under regulation 18(2)(g).**
- 2.72 Reg 18(2)(b)(i) – Significant benefit: Reasonable choice with regard to obtaining pharmaceutical services
- 2.73 The SW Committee noted a map showing the location of existing pharmacies in the area.
- 2.74 The SW Committee noted a list of pharmacies in the area of the best estimate showing their opening hours and distances, also a route map to the nearest pharmacy on foot, by car and the best estimate map which shows where the former Boots and Lloyds pharmacies were located.
- 2.75 The Boots Pharmacy that exited in March 2024 dispensed around 2000 items per month before the notice for this location was given as can be seen below from the 2023-24 data. Also shown below is data for the advanced services for the former Boots [Dispensing data, tables and graphs [See Appendix B for Committee]
- 2.76 The SW Committee noted that residents of the local area are largely mobile and would be able to drive or utilise public transport to accesses alternative pharmacy provision. They would also be used to going East to Chippenham for other services, where there are four different providers to choose from. Similarly, Box Pharmacy is available to choose from, 3.6 miles to the West.
- 2.77 Patients within the local area can access a distance selling pharmacy as an alternative form of pharmaceutical services. The SW Committee note this and the other pharmacies in Box and Chippenham provide reasonable choice for this community.
- 2.78 The SW Committee noted the Boots Pharmacy that exited the area had a low dispensing volume.

- 2.79 The SW Committee noted patients concerns expressed in the Interested Party responses received. It was acknowledged that having access to the closed Boots may have been convenient for some people who were visiting the centre of Corsham for other purposes. However, the very low volumes of dispensing activity suggested few people were choosing to use it.
- 2.80 The SW Committee was of the view that for a rural area, there are a number of pharmacies available nearby, providing reasonable choice to patients.
- 2.81 The SW Committee is sympathetic to challenges faced by patients using the remaining pharmacy, as a result to changes in market provision. These challenges will be picked up through other escalation routes.
- 2.82 **The SW Committee was of the view that because of the accessibility and proximity of the existing pharmacies by car or by bus that granting the application would not confer a significant benefit by way of access to, or choice of, pharmaceutical services.**
- 2.83 Reg 18(2)(b)(ii) – Significant Benefit: Patients with a protected characteristic
- 2.84 In the supporting information the applicant references elderly, disabled people and parents with young children and suggests that due to high levels of deprivation, the distance involved to access pharmaceutical services is not reasonable/does not provide reasonable choice. The applicant suggests that this application would secure significantly more accessible pharmaceutical services and that residents may be deterred from accessing services due to the transport costs involved.
- 2.85 Little evidence was present to support this assertion and in the SW Committee's view the population in this area is largely mobile and there are good bus services available for those without access to a car. The availability of distance selling providers was also noted, who all provide free home delivery.
- 2.86 **The SW Committee is of the view that granting the application would not confer significant benefits on people sharing a protected characteristic.**
- 2.87 Reg 18(2)(b)(iii) – Significant Benefit: Innovative approaches to delivery of pharmaceutical services.
- 2.88 No information has been provided by any party on this matter.
- 2.89 **The SW Committee was of the view that granting the application would not lead to significant benefits by virtue of innovation OVERALL RECOMMENDATION**
- 2.90 **The SW Committee determined that the application SHOULD NOT be GRANTED because:**
- 2.90.1 Granting the application would not confer a significant benefit by way of access to, or choice of, pharmaceutical services.
- 2.90.2 Granting the application would not confer significant benefits on people sharing a protected characteristic.
- 2.90.3 Granting the application would not lead to significant benefits by virtue of innovation
- 2.91 Impact on dispensing patients

- 2.92 As the proposed pharmacy is within 1.6Km of a controlled locality the impact on any dispensing patients must be considered, if the application had been granted.
- 2.93 The SW Committee noted details of how many dispensing patients live within a 1.6km of the best estimate displayed in the following table:

Practice	Dispensing	Non Disp	Disp	Disp within 1.6km
Jubilee Field Surgery	Yes	732	4,160	19
Patford House Surgery	Yes	12,791	2,004	2
Boa & Melksham Health Centre	Yes	15,238	4,357	1
Total				22

- 2.94 **Chapter 32 of the Manual states:**
- 2.95 *Periods of gradualisation should generally be no shorter than one month and, other than in exceptional circumstances, should last no longer than three months.*
- 2.96 *Exceptional circumstances may include:*
- 2.96.1 *the loss by a dispensing practice of all its dispensing patients,*
- 2.96.2 *where the reduction in the number of dispensing patients would lead to staff changes or redundancies, or*
- 2.96.3 *where there is only one pharmacy within a 1.6km of the practice premises and that is the pharmacy that is opening and its ability to absorb former dispensing patients effectively needs to be staged over time.*
- 2.97 No party has made any representations on the matter of gradualisation.
- 2.98 **The SW Committee was of the view 1 month period of gradualisation would be appropriate had the application been granted.**
- 2.99 Appeal Rights
- 2.100 The applicant will have appeal rights as the application is declined.
- 2.101 **The SW Committee took the view that the following practices would have had appeal rights against any gradualisation decision had the application been granted: Jubilee Fields, Patford House Surgery and Boa & Melksham Health Centre.**
- 2.102 Appeal Rights
- 2.103 The applicant will have appeal rights as the application is declined."

3 The Appeal

In a letter dated 28 September 2024 addressed to NHS Resolution, the Applicant represented by Healthcare Plus Consulting Ltd appealed against the Commissioner's decision. The grounds of appeal are:

- 3.1 "Thank you for your letter dated 29th August 2024 to my client. Careplus Pharmacy Ltd have instructed us (Healthcare Plus Consulting Ltd) to act on their behalf for this appeal, please find an authorisation letter attached.
- 3.2 We would like to appeal the decision made in relation to the above unforeseen benefits application.
- 3.3 We submit that NHS England have failed to properly evaluate Regulation 18, particularly the aspect of whether there is reasonable choice to pharmaceutical provision within Corsham.
- 3.4 We re-attach previous correspondence for re-consideration by NHS Resolution and set out our appeal below.
- 3.5 NHS England have overlooked the fact that pharmaceutical provision for the residents of Corsham is dire, with only one pharmacy to serve a population of approximately 16,000 residents. As previously highlighted, this represents an effective 6.25 pharmacies per 100,000 people – this is dire access to pharmaceutical provision, and something which is not mentioned in the decision report by NHS England.
- 3.6 Following the closure of the Boots pharmacy, residents are now forced to access pharmaceutical provision at Shaunak's Pharmacy. This is representative of no choice to pharmaceutical provision, much less than the threshold of 'reasonable choice'.
- 3.7 NHS England suggest that those residing near the proposed site are able to access provision at surrounding pharmacies. We strongly contest such notions and for those residents without access to a car, alternative pharmaceutical provision to the Shaunak's Pharmacy is difficult to access. These journeys can be found overleaf.
- 3.8 **Box Pharmacy, SN13 9RG**
- 3.9 This pharmacy is 1.9 miles away or a 15-minute bus journey from the proposed site, via the 231 bus. However, this bus is infrequent and only runs every half an hour. We do not consider this as providing reasonable access or choice to pharmaceutical provision.
- 3.10 **Allied Pharmacy, Hathaway Medical Centre, SN14 6GT**
- 3.11 This pharmacy is 4.2 miles away or a 20-minute bus journey from the proposed site, via the 231 bus. As highlighted above, this bus is infrequent and only runs every half an hour. After alighting from the bus at Saxon Street, patients will still have a 0.5-mile one-way journey to access the pharmacy. We do not consider this as providing reasonable access or choice to pharmaceutical provision.
- 3.12 **Rowden Hill Pharmacy, SN15 2SD**
- 3.13 This pharmacy is 3.6 miles away or a 15-minute bus journey from the proposed site, via the 231 and X34 bus. We do not consider taking multiple buses to access pharmaceutical provision as representative of reasonable choice or access. Additionally, these buses can only be caught consecutively every hour, and thus is very infrequent. Again, we submit that potentially having to wait for an hour for a bus on a

return journey from visiting a pharmacy is not representative of reasonable choice or access.

3.14 Boots, SN15 3ER

3.15 This pharmacy is 4.2 miles away or a 33-minute bus journey from the proposed site, via the 231 bus. This bus is infrequent and only runs hourly to this location. We do not consider this as providing reasonable access or choice to pharmaceutical provision.

3.16 From the journeys above it is clear that those who do not have access to a vehicle and are reliant on public transport to access pharmaceutical provision, have no other choice but to access the Shaunak's Pharmacy for pharmaceutical provision. We reiterate that one pharmacy is insufficient to serve a population the size of Corsham, and the Boots closure has effectively created a monopoly on pharmaceutical provision, effectively eliminating any remanence of 'reasonable choice'. Patients are forced to access Shaunak's Pharmacy despite the small unit and long queues.

3.17 We submit that granting this application would provide residents of Corsham with reasonable choice to accessing alternative pharmaceutical provision. It would also alleviate pressures felt by the only remaining pharmacy in Corsham, which is unable to adequately serve such a large reliant population. Thus, we invite NHS Resolution to grant my client's application."

3.18 Enclosures:

3.18.1 Corsham New Contract Supporting information [See paragraphs 1.3 to 1.46 including Appendix A for Committee as above].

3.18.2 Careplus Pharmacy Ltd represented by Healthcare Plus Consulting letter to the Commissioner dated 5 July 2024: [see paragraph 3.19 to 3.44 below].

3.18.3 Letter of authority from Careplus Pharmacy Ltd dated 28 September 2024.

3.18.4 Copy of South West Pharmaceutical Services Regulations Committee Decision Report dated 1 August 2024 [See paragraphs 2.6 to 2.104 including Appendix B for Committee as above].

Careplus Pharmacy Ltd represented by Healthcare Plus Consulting letter to the Commissioner dated 5 July 2024

3.19 "Thank you for your letter dated 26th June 2024. We welcome comments from all local parties and note the following:

3.19.1 It is undisputed through all representations that pharmaceutical provision is dire in Corsham, with an effective 6.25 pharmacies per 100,000 people, less than half the average for Wiltshire (13.3/100,000) and well below the average for England (20.6/100,000).

3.19.2 It is undisputed that pharmaceutical provision in Corsham not only serves residents of Corsham but residents of surrounding villages.

3.19.3 It is undisputed that Corsham has experienced rapid population growth in years of late.

3.19.4 It is undisputed that Corsham is home to a large proportion of elderly residents who consequently have greater health needs.

- 3.19.5 It is undisputed that residents that were accustomed to accessing pharmaceutical provision via the No. 10, 231, 555, 69 zigzag buses no longer have access/ reasonable choice to pharmaceutical provision.
- 3.20 Taking each representation in turn overleaf.
- 3.21 **Corsham Town Council**
- 3.22 We welcome the support from Corsham Town Council for this application. The Council will be perceptive to local health needs and have good knowledge on whether extra pharmaceutical provision is required. It is clear that there is a need for another pharmacy within Corsham when we consider the pressure that Shaunak's pharmacy is under. When we consider the elderly population of Corsham, we submit that excessive queuing for prescriptions is not representative of reasonable choice or access to pharmaceutical provision.
- 3.23 **Unsolicited Comments**
- 3.24 The Committee will be aware that the ICB received a number of comments from the local population highlighting the need for another pharmacy within Corsham.
- 3.25 One commenter highlights that the closure of the Boots has had a *"devastating effect on the ability of the local people to easily access a pharmacy"*. This should be read in the context of the elderly population within Corsham, with 16% of the population not having access to a car/van; and the poor bus routes to Shaunak's pharmacy. It is clear that there are residents without a car who were accustomed to accessing pharmaceutical provision via the No. 10, 231, 555, 69 zigzag buses. These residents are now unable to access pharmaceutical provision, hence the *"devastating"* impact.
- 3.26 There are also several comments highlighting that Shaunak's pharmacy is struggling to cope with the demands placed upon it:
- 3.26.1 *"struggling with demand"*
- 3.26.2 *"not being able to cope with the new workload"*
- 3.26.3 *"immense strain has been placed on the sole remaining pharmacy"*
- 3.26.4 *"we face week long delays to get prescriptions"*
- 3.26.5 *"unable to cope with demand"*
- 3.27 As highlighted in my client's original application, one pharmacy is not sufficient to serve the 16,000 population of Corsham and the surrounding areas. It is clear that patients are not receiving an adequate pharmaceutical service from Shaunak's Pharmacy. These service levels stem from the large population and the lack of choice of pharmaceutical provider.
- 3.28 Granting my clients application will restore this choice to pharmaceutical provision.
- 3.29 **Shaunak's Pharmacy**
- 3.30 Shaunak's Pharmacy highlight that residents of Corsham have greater access to a car than the rest of England. We submit that whilst this may be true, the fact remains that 16% of Corsham residents do not have access to a car – this is not an insignificant population. These residents are unable to access alternative pharmaceutical provision outside of Corsham and have no choice but to utilise Shaunak's pharmacy which

suffers from extensive queues. It is clear that these residents have no 'choice' to pharmaceutical provision – much less than the threshold of 'reasonable choice'.

- 3.31 We also highlight that due to the high proportion of elderly residents (28% of the population are over 60), many elderly residents may own cars but may not utilise them due to confidence issues when driving. Indeed, there may also be residents who drive but may not feel comfortable doing so during emergencies or during the winter months. Hence, the percentage of residents that utilise a car within the localised area is likely to be much less than the 84% of residents reported by census data.
- 3.32 Shaunak's Pharmacy assert that Allied Pharmacy in Chippenham provides adequate choice by way of an out of hours pharmacy. We disagree with this notion and submit that a 3.9 mile one-way journey does not represent reasonable choice to out of hours provision, especially for those who do not have access to a car. We note that there is no direct bus from Corsham to Allied Pharmacy in Chippenham.
- 3.33 Shaunak's also highlight a recent CMA decision that effectively ruled that brick-and-mortar pharmacies are substitutable to Distance Selling Pharmacies (DSPs); going on to argue that DSPs provide reasonable choice to pharmaceutical provision for residents of Corsham.
- 3.34 We highlight to the Committee that whilst brick-and-mortar pharmacies provide reasonable choice to DSPs, the converse is not necessarily true i.e. **DSPs do not necessarily provide reasonable choice to brick-and-mortar pharmacies**. This is obvious, as much like dispensing doctors, DSPs cannot provide the NHS services suite that a bricks-and-mortar pharmacy can provide. DSPs also do not provide reasonable choice to pharmaceutical provision for those in need of urgent medication. The internet can also be a barrier to access in utilising DSPs.
- 3.35 Shaunak's Pharmacy also claim that they would be happy to open the extra hours proposed by my client. As a current contractor, it is within Shaunak's Pharmacy's capability to open the extra hours highlighted by my client. The fact that they do not already open these hours highlights the lack of commitment/ desire to provide pharmaceutical provision at these times.
- 3.36 **Community Pharmacy Swindon & Wiltshire (LPC)**
- 3.37 We would like the Committee to note that the LPC represents the interest of **current** pharmaceutical contractors. The LPC are inherently obliged to contest unforeseen benefits applications, in order to fulfil their responsibilities to current contractors. Hence, comments by the LPC are biased and should be read in such context.
- 3.38 The LPC highlight the lack of explicit identification of a need within the PNA. We reiterate that an Unforeseen Benefits application is in its very nature, unforeseen, offering improvements or better access to pharmaceutical services not captured within the PNA.
- 3.39 Much like Shaunak's, the LPC also highlight Distance Selling Pharmacies as providing reasonable choice to provision. We again strongly contest this notion on the basis that DSPs do not provide the full-suite of pharmaceutical services; are not helpful in obtaining urgent medication; and require the use of the internet – something that elderly populations may be unable to do.
- 3.40 **Conclusion**
- 3.41 In conclusion, granting this application would secure better access and improvements to pharmaceutical services for residents of Corsham and the surrounding villages.

- 3.42 There is a need for another pharmacy in Corsham when we consider the poor access to alternative pharmaceutical provision; the elderly population; and the poor access to a car/van for some residents. It is clear that having one pharmacy to serve such a large reliant population is not representative of adequate pharmaceutical choice.
- 3.43 Granting this application would provide reasonable choice to a different pharmaceutical provider within Corsham, and ease pressures on the current pharmaceutical network.
- 3.44 Hence, regulation 18 has been met and this application should be granted.”

4 Summary of Representations

This is a summary of representations received on the appeal.

4.1 SHAUNAKS LIMITED REPRESENTED BY RUSHPORT ADVISORY LLP

- 4.1.1 “I act for Shaunaks Limited and have been instructed to submit these comments in relation to the appeal brought by Careplus Pharmacy Limited in the above application.
- 4.1.2 As the Committee will note the application is for Unforeseen Benefit with a best estimate address given as “main commercial are within Corsham”.
- 4.1.3 The Committee is clearly well aware of the legal test that the Applicant must satisfy. In summary, the Applicant is required to satisfy the Committee that the granting of their application would secure improvements or better access to pharmaceutical services and;
- 4.1.4 (b) whether, notwithstanding that the improvements or better access were not included in the relevant pharmaceutical needs assessment, it is satisfied that, having regard in particular to the desirability of—
- 4.1.4.1 (i) there being a reasonable choice with regard to obtaining pharmaceutical services in the area of the relevant HWB (taking into account also the NHSCB's duties under sections 13I and 13P of the 2006 Act F109 (duty as to patient choice and duty as respects variation in provision of health services)),
- 4.1.4.2 (ii) people who share a protected characteristic having access to services that meet specific needs for pharmaceutical services that, in the area of the relevant HWB, are difficult for them to access (taking into account also the NHSCB's duties under section 13G of the 2006 Act F110 (duty as to reducing inequalities)), [F111 or]
- 4.1.4.3 (iii) there being innovative approaches taken with regard to the delivery of pharmaceutical services (taking into account also the NHSCB's duties under section 13K of the 2006 Act F112 (duty to promote innovation)), granting the application would confer significant benefits on persons in the area of the relevant HWB which were not foreseen when the relevant pharmaceutical needs assessment was published;
- 4.1.5 In this case we submit that the application does not meet the requirements of the legal test for the reasons set out below.
- 4.1.6 **Location**

- 4.1.7 We note that the Applicant has provided a best estimate address that is extremely vague, ie the “main commercial area of Corsham”. It is unclear what area this covers as there is no definition provided, but this area would likely include the location of my client’s pharmacy and the site of the local doctor’s surgery.
- 4.1.8 [Aerial photograph showing the location of Shaunaks Pharmacy in the postcode mentioned by the Applicant]. [See page 1 of Appendix C for Committee].
- 4.1.9 The Application must therefore be judged in its real context. It is not an application that would seek to secure better access to pharmaceutical services and is simply an opportunistic attempt to open a pharmacy within a few metres of my client’s existing pharmacy and the nearby medical centre simply because a quiet branch of Boots closed.
- 4.1.10 **The Appeal**
- 4.1.11 It is notable that the Applicant incorrectly states the legal test and bases their criticism of the Commissioner’s decision on this error. The Applicant states;
- 4.1.11.1 *We submit that NHS England have failed to properly evaluate Regulation 18, particularly the aspect of whether there is reasonable choice to pharmaceutical provision within Corsham.*
- 4.1.12 As the Committee will be aware, the decision maker is not restricted to considering pharmacies within a single small area when considering if there is reasonable choice in respect of pharmaceutical services.
- 4.1.13 Whilst it is correct that Corsham has only one pharmacy, Corsham is a relatively small area surrounded by open land that would be considered rural. The Boots Pharmacy in Corsham was dispensing between 2,000 and 3,000 items per month for many years prior to its closure. Put simply, patients overwhelmingly preferred to use my client’s pharmacy and the Boots pharmacy was hardly used at all. My client has been easily able to absorb the small increase in their provision of pharmaceutical services following the Boots closure and is in no way unable to cope with the volume of dispensing that they undertake.
- 4.1.14 Whilst my client’s pharmacy is busy, over 3,000 items that it dispenses per month are provided via my client’s Central MDS Hub as they are for patients using a monitored dosage system.
- 4.1.15 We note that the Applicant has provided information in relation to accessing pharmacies other than my client’s pharmacy. Unfortunately, this information is not correct. We have copied below the Applicant’s submission and then highlighted the errors and omissions.
- 4.1.16 **Box Pharmacy, SN13 9RG**
- 4.1.17 *This pharmacy is 1.9 miles away or a 15-minute bus journey from the proposed site, via the 231 bus. However, this bus is infrequent and only runs every half an hour.*
- 4.1.18 The Applicant has ignored the X31 bus service which takes 10 minutes to go from the Applicant’s proposed location to Box Pharmacy. This includes 2 minutes of walking time.

- 4.1.19 The X31 is an hourly service leaving Corsham at 10 minutes past each hour. The 231 bus service then also operates every 30 minutes, which means that there are 3 buses per hour from Corsham to Box Pharmacy for those who wish to not use the pharmacy in Corsham and instead choose to travel outside Corsham to avail of reasonable choice.
- 4.1.20 **Allied Pharmacy, Hathaway Medical Centre, SN14 6GT**
- 4.1.21 *This pharmacy is 4.2 miles away or a 20-minute bus journey from the proposed site, via the 231 bus. As highlighted above, this bus is infrequent and only runs every half an hour. After alighting from the bus at Saxon Street, patients will still have a 0.5-mile one-way journey to access the pharmacy.*
- 4.1.22 Whilst it is correct that accessing this pharmacy involves a 20 minute bus journey and 0.5 mile walk if using the 231 bus, there is no reason for any patient to make such a journey as it would ignore other pharmacies that are much easier to access. There is no requirement for every pharmacy to be easily accessible in order to demonstrate reasonable choice.
- 4.1.23 **Rowden Hill Pharmacy, SN15 2SD**
- 4.1.24 *This pharmacy is 3.6 miles away or a 15-minute bus journey from the proposed site, via the 231 and X34 bus. We do not consider taking multiple buses to access pharmaceutical provision as representative of reasonable choice or access.*
- 4.1.25 *Additionally, these buses can only be caught consecutively every hour, and thus is very infrequent. Again, we submit that potentially having to wait for an hour for a bus on a return journey from visiting a pharmacy is not representative of reasonable choice or access.*
- 4.1.26 The Applicant has (again) ignored the X31 bus service which takes 18 minutes (including walking time) to go from the Applicant's proposed location to Rowden Hill Pharmacy. The X31 is an hourly service leaving Corsham at 10 minutes past each hour. The 231 bus service then also operates every 30 minutes, which means that there are 3 buses per hour from Corsham to Rowden Hill Pharmacy for those who wish to not use the pharmacy in Corsham and instead choose to travel outside Corsham to avail of reasonable choice.
- 4.1.27 Given the availability of alternate pharmacies by public transport we have not considered access to pharmacies that are further away as there is no need to. Bus timetables are attached to this letter. [See pages 2 -3 of Appendix C for Committee]
- 4.1.28 My client not only offers, but also provides significant numbers of consultation for advanced / enhanced and locally commissioned services. My client's pharmacy acts as a health hub for additional primary care services and is well used and supported by patients.
- 4.1.29 The Applicant offers only Monday to Friday opening, compared to the Monday to Saturday opening provided by my client. The only additional opening hours offered by the Applicant are from 12.30pm to 1.30pm Monday to Friday, however they offer no Saturday opening.
- 4.1.30 My client has already provided (in their initial objection letter to this application) evidence on the availability of car / van transport and evidence in relation to health of the local population.

- 4.1.31 It is notable that the Applicant has chosen to provide no information of this type as they recognise that the local population is in better health than the average for England and the local population has better access to their own transport than the English average. Turning to the part of the appeal document titled “Corsham New Contract Supporting Information”, there are other errors, contradictions and omissions that the Applicant has made.
- 4.1.32 The Applicant states that surrounding villages are served by Corsham. Whilst those living in surrounding villages may indeed use Corsham for services, they are not living on bus routes and would be using their own transport to access Corsham. For those residents it would be just as easy to access areas such as Box Hill or Chippenham where multiple alternate pharmacies are located, but the Applicant simply ignores this.
- 4.1.33 The Applicant then asks the Committee to “extrapolate” this population. This is a somewhat bizarre suggestion which again simply ignores the other pharmacies located close to Corsham which have already been detailed above.
- 4.1.34 The Applicant asks the Committee to read the reasons provided by patients for signing the petition to keep Boots open. As the Committee will note, the reasons provided focus on pharmacy (in general) being an “essential service”, or Boots offering collection of online orders from their pharmacy. There is no mention of any patient experiencing difficulty accessing my client’s pharmacy.
- 4.1.35 The Applicant’s representative refers to pharmaceutical provision in Corsham as “dire”. In their letter of 5 July 2024 they refer to this claim as “undisputed”. Respectfully, the Applicant should not use such language or engage in such hyperbole. My client offers a quite exemplary service of which they are rightfully proud. In fact, every single point that the Applicant describes as “undisputed” is not only disputed but also incorrect.
- 4.1.36 The tone of the letter of appeal is largely argumentative, and whilst we could go through the Appeal line by line and point out why the comments are either exaggerated or misleading, we instead rely on the simple fact that Corsham has my client’s pharmacy that serves those who live in the village and that there are alternate pharmacies available in nearby villages and towns that can be accessed by car or by regular and frequent bus services (3 per hour in each direction).
- 4.1.37 None of the evidence provided demonstrates that the Applicant would meet the requirements of regulations 18 and the application should be refused and the appeal dismissed.
- 4.1.38 As a final point, my client is concerned that the Applicant’s representative intends to use their opportunity to comment on this letter as an opportunity to provide additional new evidence to the Committee. The Applicant has had many months to collate its evidence and should not engage in an abuse of process to submit new matters at this late stage in proceedings and this is also made clear in the letters sent to Applicant by Primary Care Appeals.
- 4.1.39 We look forward to hearing from you in due course.”

4.2 CORSHAM TOWN COUNCIL

- 4.2.1 “Thank you for your letter dated 8 October 2024 regarding the above appeal to NHS Resolution.

- 4.2.2 I attach Corsham Town Council's previous submissions dated 12 June 2024 and 9 July 2024 in support of the appeal to NHS Resolution.
- 4.2.3 In supporting the appeal, the Town Council would like to emphasise the following points:
- 4.2.3.1 The closure of Boots pharmacy from the town centre earlier this year has had a huge detrimental impact on Corsham's residents, in particular those older and more vulnerable members of our community. Corsham has an ageing population, many of whom are less able to use online services and rely on public transport to gain access to services elsewhere.
 - 4.2.3.2 The loss of Boots has adversely impacted on the standard of service provided by the only other pharmacy in Corsham. We have received complaints about queuing and waiting times to pick up prescriptions, which is frustrating for those in need or caring for others.
 - 4.2.3.3 The Town Council agrees that there is a need for a new pharmacy which would help close the gap in service provision and increase capacity. It would provide significant benefits to Corsham and the surrounding area, providing choice, convenience and reducing waiting and queuing times, especially for those with particular needs.
 - 4.2.3.4 Residents clearly support the proposed new pharmacy and make several useful points such as: accessibility for those with mobility issues; the remaining pharmacy struggling to cope with the increased demand; lengthy queues (25 minutes is quoted) at the remaining pharmacy; the inability of the remaining pharmacy to deal with increased services previously provided by GPs, and the loss of Lloyds pharmacy from Sainsbury's, Chippenham, causing additional pressure on Shaunaks, Corsham.
 - 4.2.3.5 Whilst Boots dispensed less than the national average number of prescriptions per year, Shaunaks dispense significantly more than average.
 - 4.2.3.6 Corsham is a rural location with an ageing population. Good availability of prescriptions are vital in contributing to the health and wellbeing of our community.
 - 4.2.3.7 Due to the lack of good public transport, households without access to a car require more local services rather than less. Those who are isolated have greater healthcare needs.
 - 4.2.3.8 Pharmacies are expected to take on more and more services which GP's and hospitals previously provided. Without additional resources, service levels are likely to deteriorate. If the pharmacies cannot cope or the customers are unhappy, they are more likely to return to GP surgeries, increasing the pressure on them.
- 4.2.4 I hope this is helpful and if you need any further information from us, please do not hesitate to contact me."

Corsham Town Council Letter to the Commissioner dated 12 June 2024

- 4.2.5 “In response to your consultation letter dated 9 May 2024, Corsham Town Council has met to discuss the application by Careplus Ltd.
- 4.2.6 The Town Council fully supports the application and urges Bath, North East Somerset, Swindon and Wiltshire ICB/NHS England to approve the application for a new pharmacy in Corsham Town Centre.
- 4.2.7 The closure of Boots pharmacy from the town centre earlier this year has had a huge detrimental impact on Corsham’s residents, in particular those older and more vulnerable members of our community. Corsham has an aging population, many of whom are less able to use online services and rely on public transport to gain access to services elsewhere.
- 4.2.8 The loss of Boots has adversely impacted on the standard of service provided by the only other pharmacy in Corsham. We have received complaints about queuing and waiting times to pick up prescriptions, which is frustrating for those in need or caring for others.
- 4.2.9 The Town Council agrees that there is a need for a new pharmacy which would help close the gap in service provision and increase capacity. It would provide significant benefits to Corsham and the surrounding area, providing choice, convenience and reducing waiting and queuing times, especially for those with particular needs.
- 4.2.10 If you need any further information from us, please do not hesitate to contact me.”

Corsham Town Council Letter to the Commissioner dated 9 July 2024

- 4.2.11 “Thank you for your letter dated 26 June 2024 regarding the written representations received regarding the above application.
- 4.2.12 Our comments on the representations are as follows:
- 4.2.13 **Unsolicited Responses Received** – Residents clearly support the proposed new pharmacy and make several useful points such as: accessibility for those with mobility issues; the remaining pharmacy struggling to cope with the increased demand; lengthy queues (25 minutes is quoted) at the remaining pharmacy; the inability of the remaining pharmacy to deal with increased services previously provided by GPs, and the loss of Lloyds pharmacy from Sainsbury’s, Chippenham, causing additional pressure on Shaunaks, Corsham.
- 4.2.14 **Shaunaks** – Shaunaks reference the Pharmaceutical Needs Assessment (PNA). We would urge NHS England to update the PNA or produce a supplementary statement following the loss of Boots in Corsham and Lloyds in Sainsbury’s, Chippenham. We are confident that this will demonstrate the need for a replacement pharmacy in Corsham town centre which would support the application by Careplus Pharmacy Ltd.
- 4.2.15 Shaunaks mentions that Boots dispensed 2,000 items per month. Whilst this is lower than the national average, Corsham is a rural location with an ageing population and those 24,000 items per year are vital in contributing to the health and wellbeing of our community. Shaunaks admits it is struggling to cope with the demands placed on it and does not have space to serve its current customers comfortably. Once new customers and services previously

provided by GPs are included, there is a real risk that vulnerable residents' health will suffer.

- 4.2.16 Shaunaks claims to be unaware of any patients reporting difficulty in accessing pharmaceutical services at its pharmacy. This shows a lack of customer awareness and conflicts with comments and concerns raised by several residents.
- 4.2.17 Shaunaks' statement about access to a car being greater than the national average is largely irrelevant as, due to the lack of good public transport, the 16% of Corsham without access to a car requires more local services rather than less. Those who are isolated will have greater healthcare needs.
- 4.2.18 The increase in opening hours would be very welcome and would help ease the pressure on all pharmacies, reduce queuing and give those working during the day a better opportunity to see a pharmacist. Regardless of the outcome of Careplus Pharmacy's application, we would stress the need for an extension of opening hours.
- 4.2.19 Bricks and mortar pharmacies, as mentioned in Shaunaks' response are vital for many of our residents, hence the high number of products dispensed in Corsham. They will become more vital as services are moved over from GP surgeries to pharmacists.
- 4.2.20 Regarding Shaunaks' conclusion, we disagree that there is already a reasonable choice of pharmaceutical provision in Corsham. Their unawareness of complaints about service delivery shows a lack of community engagement and communication, as many such complaints are known to the Town Council. There are often verbal complaints to Councillors and staff, as well as posts on social media.
- 4.2.21 **Community Pharmacy Swindon and Wiltshire** – This membership organisation's stated purpose is to 'support and encourage contractors to fulfil their potential'. CPSW appears to favour the protection of its members over providing the best possible service to the communities being served. CPSW's comments regarding evidence to support the lack of provision assertions can be dismissed as there is community evidence that the loss of Boots is impacting negatively on their lives. The organisation also admits that it is not aware of any specific detriment which may arise from the application.
- 4.2.22 The PNA referred to is out of date and does not reflect the loss of Boots from Corsham in March 2024. The 466-name petition was compiled in a very short space of time. Given more time and using a wider range of methods to record names would have undoubtedly increased the already significant number of petitioners.
- 4.2.23 CPSW recognises the good connectivity of the town centre site which is far more convenient and accessible for those not needing the surgery.
- 4.2.24 The Town Council would support weekend opening in addition to the extended hours already set out in the application.
- 4.2.25 **Overall Capacity** – According to Shaunaks, the average number of dispensed items per month is 7,000. They are currently dispensing 20-21,000 items per month. This would indicate an overall need for two or three pharmacies in Corsham. Whilst Boots dispensed a lower-than-average number of items, Shaunaks dispenses around three times the national average. Shaunaks

admitted in a meeting with the Town Council on 26 June 2024 that they lack the space to handle services which government is asking pharmacists to deliver. They say their biggest issue in Corsham is their current building. A second pharmacy in Corsham would alleviate this pressure. At that meeting they also admitted that a second pharmacy would be good for residents.

- 4.2.26 I hope this is helpful and if you need any further information from us, please do not hesitate to contact me.”

4.3 THE COMMISSIONER

- 4.3.1 “Thank you for your letter, received 8th October 2024, addressed to Mr Speight at Primary Care Support England (PCSE) enclosing a copy of the appeal as detailed above. The South West Pharmaceutical Services Regulations Committee (SW Committee) wishes to make the following comments on the appeal.
- 4.3.2 The SW Committee noted the relevant PNA does not identify any gaps or needs for Corsham. The HWB does not appear to have published a supplementary statement regarding the exit of the Boots that used to be at 22 Martingate, Corsham.
- 4.3.3 The applicant offers slightly earlier opening and later closing times weekdays than Shaunaks pharmacy (0830 start instead of 0900 and 1830 finish instead of 1800). It was noted, however, the Boots that exited did not open until 0900 and closed at 1730 weekdays. The PNA does not highlight any concerns re the availability of opening hours in Corsham. It is also of note that the applicant does not offer any opening on Saturdays and the former Boots was open until 1700 on Saturdays and the Shaunaks opens Saturday mornings.
- 4.3.4 The appellant discusses the number of pharmacies per capita [sic] but provides no evidence as to what the number should be. As Primary Care Appeals will be aware there is no published or agreed standard for what the “correct” number of pharmacies per capita should be. As the SW Committee noted in its original decision, the level of activity at the Boots that exited was very low so the number of people choosing to use it was very small. The community pharmacy market has also changed in recent years, with pharmacies developing their working practices to accommodate larger activity volumes.
- 4.3.5 The appellant claims that Distance Selling Pharmacies (DSP) cannot be considered as part of choice and they do not provide the same services as a “bricks and mortar” Pharmacy. As Primary Care Appeals will be aware, DSPs MUST provide all the same essential services, though without face to face contact., The SW Committee also took into account DSPs can offer advanced services and this can be done on site and many of the advanced services can be done remotely. As Primary Care Appeals will be aware distance selling pharmacies must have arrangements in place so they can communicate confidentially with a person via telephone (or other live audio link) and a live video link.
- 4.3.6 Regarding DSPs, as NHS Resolution will be aware, the Competition & Markets Authority (CMA), in March 2024 regarding the merger of Pharmacy 2 U and Lloyds direct, concluded that “*many customers view visiting brick-and-mortar pharmacies as substitutable to obtaining POMs from a DSP*”. The SW Committee would respectfully suggest that the reverse must also be true, meaning a DSP is a valid choice that a patient could exercise. The SW Committee accepts that a DSP may not suit everyone, but it is a choice that

patients could make and so their existence cannot just be ignored in determining pharmacy applications as the appellant appears to suggest. The CMA's conclusion mentioned can be found at Full text decision. [See Appendix D for Committee]

- 4.3.7 The SW Committee looks forward to receiving the Primary Care Appeals' decision in due course."

5 Observations

5.1 CORSHAM TOWN COUNCIL

- 5.1.1 "Thank you for your letter dated 12 November 2024 regarding the above appeal to NHS Resolution, and the opportunity to make final observations.
- 5.1.2 There are a few important observations as follows:
- 5.1.3 Letter from NHS South West Collaborate Commissioning Hub dated 28 October 2024 – A further gap in provision is likely to occur if the Box Pharmacy closes. We have been informed by Box Parish Council that Box Pharmacy is now up for sale. If it cannot be sold, but instead closes, the impact of further loss of pharmacy provision in the Corsham area will be greatly exacerbated.
- 5.1.4 Letter from Rushport Advisory dated 23 October 2024 –
- 5.1.5 **Location** – Rushport claims Shaunaks Pharmacy is within the 'main commercial area of Corsham'. It is well outside of the main commercial area. Wiltshire Council defines the Town Centre within its Local Plan Consultation. The existing and proposed town centre boundaries are clearly shown on the plans below (see <https://consult.wiltshire.gov.uk/kpse/event/6565FF19-695C-4721-B19F-3226D666441E/section/s16939060350461>)
- 5.1.6 **Figure E.5 Corsham Existing Town Centre Boundary** [See Appendix E for Committee]
- 5.1.7 **Figure E.6 Corsham Proposed Town Centre Boundary** [See Appendix E for Committee]
- 5.1.8 The proposed new pharmacy is clearly not 'within a few metres' of Shaunaks Pharmacy.
- 5.1.9 **The Appeal** – There is no evidence that 'patients overwhelmingly preferred' Shaunaks or that 'Boots pharmacy was hardly used at all'. Shaunaks has no customer feedback to support its claims and does not appear to recognise or accept that a number of its customers are unhappy with the current service provided.
- 5.1.10 **Box Pharmacy, SN13 9RG** – Box Pharmacy is for sale, putting its future at risk and, consequently, making it much less convenient for Box residents.
- 5.1.11 The letter goes on to state 'There is no mention of any patient experiencing difficulty accessing my client's pharmacy'. The Town Council is aware of complaints about waiting times, queuing, poor public transport connectivity and difficulties accessing the pharmacy on foot from Corsham town centre.
- 5.1.12 Finally, Rushport states 'My client offers a quite exemplary service of which they are rightfully proud'. Whilst there is certainly no criticism of Shaunaks'

employees who, by and large, carry out a good job under very difficult circumstances, they are clearly struggling to meet current demands. They do not appear to be in a position to cope effectively with any new or additional demands placed upon them, whether that be the growing and aging population, changes in NHS practices, and the possible loss of Box pharmacy.

5.1.13 If you need any further information from us, please do not hesitate to contact me.”

6 Late Observations

6.1 THE APPLICANT REPRESENTED BY HEALTHCARE PLUS CONSULTING LTD

6.1.1 “Thank you for your letter dated 12th November 2024. We note the responses made by interested parties on my client’s appeal and respond accordingly here.

6.1.2 Corsham Town Council

6.1.3 Corsham Town Council again highlight the huge detrimental impact the closure of the Boots Pharmacy has had on residents in Corsham. They highlight the complaints they have received about the queueing and waiting times at the only remaining pharmacy in Corsham, Shaunak’s Pharmacy.

6.1.4 They raise the point about carers having excessive waits to collect prescriptions. Often carers will be doing so with their vulnerable patient at home. Clearly the longer a carer has to spend waiting in a queue to collect a prescription, the more dangerous this becomes for the vulnerable resident who has been left at home alone.

6.1.5 We ask the Committee to visualise a carer popping out for 10 minutes to collect a prescription. The elderly resident may be sat down watching TV, and in next to no-time the carer will be back alongside the resident. Now imagine the scenario where said carer now has to leave for 40 minutes to collect a prescription. This has now become a not insignificant period of time that the vulnerable resident has been left alone for. Should this vulnerable resident get up to go to the toilet whilst the carer is collecting their prescription, this could cause them to slip and fall; causing potentially life threatening injuries. This is not a farfetched scenario when we consider prescriptions may have to be collected on a weekly basis. This is even more pertinent in the case of Corsham where 28% of the population are aged over 60, so this is a more likely occurrence.

6.1.6 The Council also raise the point that public transport can be poor/sparse in Corsham, so those residents who do not have access to a car are more severely affected/ isolated.

6.1.7 We also draw the Committee’s attention to the Council’s letter dated 9th July 2024, particularly comments at the end. Quoting from this letter:

6.1.8 *“Shaunaks admitted in a meeting with the Town Council on 26 June 2024 that they lack the space to handle services which government is asking pharmacists to deliver. They say their biggest issue in Corsham is their current building. A second pharmacy in Corsham would alleviate this pressure. At that meeting they also admitted that a second pharmacy would be good for residents.”*

- 6.1.9 Shaunaks themselves accept the issues of singular pharmaceutical provision and admit that a second pharmacy would be good for residents. In particular they admit to lacking the space to handle services which the government is asking pharmacies to deliver (we assume this is in relation to the new Pharmacy First scheme).
- 6.1.10 Such admissions from Shaunaks are concurrent with the data available for Pharmacy First. Based on publicly available data, Shaunaks averages 45 Pharmacy First Consultations per month and c.25,000 items per month (Pharmdata). It is notable that in the most recent available month, July 2024, Shaunaks dispensed c.28,000 items (Pharmdata).
- 6.1.11 It is notable that Shaunaks currently dispense 3.5 times the national average of items, and it would be thought that not too dissimilar activity levels would be found across the other services that this pharmacy provides.
- 6.1.12 Looking at Pharmacy First consultations, Community Pharmacy England note that the average number of Pharmacy First consultations carried out is in fact 40 per pharmacy. We can see that Shaunak's carries out the average number of Pharmacy First consultations compared to 3.5 times the average items dispensed. Given that the Council have highlighted the self-admission of Shaunaks that they are unable to provide Pharmacy First services, it is clear that Shaunaks do not have capacity to provide Pharmacy First to the sizeable population. Thus, we submit that there is currently not reasonable choice with regard to accessing Pharmacy First within Corsham.
- 6.1.13 **NHS South West Collaborative Commissioning hub**
- 6.1.14 NHS South West appear to have placed undue weight on the choice that Distance Selling Pharmacies (DSPs) offer, citing the CMA decision. We reiterate whilst bricks-and-mortar pharmacies provide choice to DSPs, the converse is not necessarily true.
- 6.1.15 DSPs are not helpful in obtaining urgent medication, and this often causes issues to patients when GPs send urgent EPS scripts to DSPs. Those who have worked in a Pharmacy will know the panic and stress a patient endures in trying to get an urgent script 'back' that has been sent to a DSP. This stress, panic, and time endured trying to obtain the script obviously is not reasonable for someone who is sick and in need of urgent medication.
- 6.1.16 The internet can often be a barrier, especially to elderly patients who are unable to use technology. These patients can also get confused and sometimes require direct contact with a pharmacist every week to ensure that they are adhering to prescribed medication and understanding any changes in their medication. DSPs cannot provide this face-to-face contact.
- 6.1.17 Additionally, DSPs have similar overheads to community pharmacy, but also must provide free delivery. Given that free delivery services often cause financial struggles for community pharmacies, it calls into question the long-term viability of DSPs. This is no better demonstrated by the 5-million-pound loss incurred by Pharmacy 2 U in the year ending 2023. Clearly, such losses are unsustainable and thus we cannot view DSPs as providing reasonable choice/ alternatives to bricks-and-mortar pharmacies.
- 6.1.18 We submit that it is clear that DSPs do not provide reasonable choice to provision.

6.1.19 **Shaunaks**

6.1.20 Firstly, we note that it appears disingenuous that Shaunaks oppose this application given the comments made in the Corsham Town Council meeting dated 26th June 2024.

6.1.21 We note that Shaunaks seek clarification on the location proposed by my client. As per my client's original application, the proposed location is in Corsham town centre – a map was provided. This DOES NOT include the Shaunaks Pharmacy site as this is not located in the town-centre.

6.1.22 Shaunaks argue that Corsham is a rural area. We would contest these claims and note that Corsham is still a town, albeit in a rural setting. This is no better demonstrated by the population densities in some of the wards that make up Corsham, per 2021 Census data.

Ward	Population Density (residents/sq km)
Corsham Ladbroke	2,106.90
Corsham Pickwick	1,134.30

6.1.23 When we compare the above population densities with the average for the local authority of Wiltshire (156.8 residents per square kilometre) and average for England (433.5 residents per square kilometre) we can see that Corsham is relatively densely populated.

6.1.24 Shaunaks also note the relatively low dispensing volumes of the closed Boots in the area.

6.1.25 Whilst this may have been the case, we submit that Pharmacy is no longer just about dispensing medication, especially with the advent of Pharmacy First. It is imperative that pharmacies are located amongst amenities that resident's access as part of their daily lives.

6.1.26 Corsham town-centre (the proposed site) is the focal point of the community and where residents access all of their daily amenities, especially in rural towns such as Corsham. We submit that a pharmacy at the proposed site would significantly improve the uptake of Pharmacy First amongst local residents as they seek extra help in settings that they are comfortable and familiar with.

6.1.27 My client would also like to note that the low dispensing volume of the closed Boots could also be attributed to the unreliability of Pharmacist provision. Residents have been unable to rely upon Boots to adequately staff this store. We submit that this unreliability led to unreliable opening times which in-turn caused the larger dispensing volumes in the Shaunaks store. An independently run pharmacy is less likely to suffer from such issues and thus my client anticipated there will be a greater dispensing volume should this application be granted.

6.1.28 Shaunaks appear to contest assertions made in my client's original appeal. We provide further clarity below:

6.1.29 **Box Pharmacy, SN13 8NN**

6.1.30 Shaunak's highlight that my client has omitted to X31 bus here. [sic] This may be the case, but the X31 bus service is hourly and hence infrequent. Buses to

this location from the proposed site can still be every half an hour (via the 231). The X31 also runs within 9 minutes of the 231 bus, meaning the 231 bus is more likely to be used as it runs every half an hour. We maintain that half an hour wait for a bus still constitutes insufficient access. We also note that journeys to Box Pharmacy would not be in the course of People's daily lives.

6.1.31 We note that the X31 bus does not operate past 10 past 4 in this direction, so does not provide access for those wishing to access pharmaceutical provision after this time.

6.1.32 **Rowden Hill Pharmacy, SN15 3SD**

6.1.33 Shaunaks are correct in mentioning that the X31 bus goes from the Proposed site to Rowden Hill Pharmacy, however this bus is hourly. When combined this route with the 231 and X34 route; the combined services can run every 40 minutes. This still represents poor access and choice to pharmaceutical provision.

6.1.34 We also note that the X31 bus runs from the town centre and not through the residential areas in Corsham. Often residents will have to find other ways to transport to the town centre before then being able to utilise the X31 bus. This is not representative of reasonable choice or access and can be seen in the images overleaf.

6.1.35 [Maps - page 1 of Appendix F]

6.1.36 **Local Complaints**

6.1.37 Shaunaks have coined my client's application as *"an opportunistic attempt to open a pharmacy", "argumentative", and "exaggerated"*.

6.1.38 They also say that there is *"no mention of any patient experiencing difficulty accessing my client's pharmacy"* and say they *"offers a quite exemplary service of which they are rightfully proud"*.

6.1.39 We strongly contest all of the above claims. My client consulted the local population on their experiences accessing alternative pharmaceutical provision. There was an outpouring of support for the pharmacy proposition / many complaints surrounding the current Shaunak's Pharmacy.

6.1.40 From the period 12/10/24 to 18/11/24, a staggering 427 emails were received from the local population highlighting the terrible access to pharmaceutical provision that residents currently have, such is the severity of the issues at ground level. These emails have been numbered and can be found in Appendix A. Given the Boots Pharmacy closed 7 months ago, Shaunaks has had plenty of time to acclimatise to this change. We submit that this has not been the case because fundamentally one pharmacy is insufficient to serve a population the size of Corsham.

6.1.41 The majority of emails provide in-depth experiences of how patients have struggled with access at the Shaunaks Pharmacy. As a consultancy practice, we have never seen such a large number of emails detailing such a large number of adverse experiences – some of the emails highlight really quite shocking experiences. We have tried our best to summarise these emails, however, ultimately, we have found it challenging to fully analyse such a large quantity of emails within the prescribed NHS deadlines, such is the volume of dissatisfaction.

- 6.1.42 We encourage the Committee to read each email in detail, as they tell quite alarming personal experiences of the service at the current Shaunak's Pharmacy.
- 6.1.43 The emails depict a dire picture of the current situation faced by patients attending Shaunak's Pharmacy with issues including, but not limited to:
- 6.1.43.1 Error in prescription causing patient to take the wrong product
 - 6.1.43.2 Dispensing the wrong number of tablets
 - 6.1.43.3 Lack of parking as car park is small and shared with Porch Surgery
 - 6.1.43.4 Lack of disabled parking, due to busy car park
 - 6.1.43.5 2 weeks to wait for a prescription to be made-up
 - 6.1.43.6 Queues outside the door into the car park
 - 6.1.43.7 Queuing outside in the rain
 - 6.1.43.8 Queues of 10/12 people long
 - 6.1.43.9 A Bouncer, who has been hired to manage the queues
 - 6.1.43.10 Unable to provide medication resulting in trip to A&E
 - 6.1.43.11 Staff who are "*drowning*" under the demand
 - 6.1.43.12 No privacy in consultation room, given the large volume of patients cramped into the small space
 - 6.1.43.13 Concerns surrounding infections given proximity of patients within the store
 - 6.1.43.14 Closed during lunch
 - 6.1.43.15 Residents having to get taxis to access the premises, only to be turned away
 - 6.1.43.16 Unreliable delivery service
 - 6.1.43.17 Delivering incorrect medication
- 6.1.44 Clearly, Shaunak's Pharmacy is really struggling, even to the point of providing incorrect medication. This is clearly unsafe, and definitely not representative of reasonable choice or access to provision. It is clear that there is an urgent need for a second pharmacy within Corsham to support the Shaunak's.
- 6.1.45 Whilst Shaunak's highlight that patients may be able to use alternative pharmaceutical provision in the area; this is clearly not what the evidence tells us. 7 months on from the closure of the Boots store and Shaunak's are still really struggling. Available data even suggests that Shaunak's is taking on even more items as can be seen from the Pharmdata graph below:
- 6.1.46 [Graph - page 2 of Appendix F]

- 6.1.47 Normally you'd expect that any pharmacy that requires patients to queue in the rain in the car park would start to lose customers/ item volume, however, Shaunaks's volume is increasing!
- 6.1.48 We submit that this is because alternative pharmacies do not provide reasonable choice to residents and thus patients in and around Corsham are forced to use the Shaunaks Pharmacy. Clearly, being forced to use a pharmacy that is not coping is representative of no choice to pharmaceutical provision much lower than the threshold of 'reasonable choice'. Thus, it is imperative that this application by my client is granted to restore reasonable choice and access to pharmaceutical provision.
- 6.1.49 There are numerous individual experiences highlighting the inadequacy of pharmaceutical provision in Corsham. Below we draw attention to a few of these emails in particular.
- 6.1.50 [Reacted by NHS Resolution] (Email 3) writes:
- 6.1.50.1 *"I have been a resident of Corsham for nearly 25 years. When I first arrived I would walk my dog across fields and now these fields are housing estates. Corsham has grown so much that there is parliamentary talks about reopening a main line railway station, and yet, our pharmacy has been taken away.*
- 6.1.50.2 *I have had to wait nearly 2 weeks for prescription medicine to be ready in Shaunaks. I have stood waiting for prescription meds for 40 minutes. I know personally of 3 medicine errors from a very overstretched pharmacy which have made the patient physically ill- Please listen to the residents of Corsham as we appeal for a pharmacy to be reinstated into our town centre."*
- 6.1.51 [Reacted by NHS Resolution] highlights the growth that Corsham has undergone in the last 20 years. Despite this growth, Corsham has lost pharmaceutical provision instead of gaining. This has caused excessive pressure on the only remaining pharmacy, Shaunaks. Waiting 2 weeks for prescription medication is clearly not representative of reasonable choice or access to provision. Additionally, a 40-minute wait in a queue is also not representative of reasonable choice or access.
- 6.1.52 [Reacted by NHS Resolution] highlights the medical errors being made by Shaunaks Pharmacy due to the pressures they are under. This is alarming to say the least and a direct result of the pharmacy being overstretched. We submit that it is currently dangerous for Corsham to only have one Pharmacy.
- 6.1.53 [Reacted by NHS Resolution] (Email 12) writes:
- 6.1.53.1 *"Now widowed and at the age of [Reacted by NHS Resolution] years, I have quite a walk to reach Shaunaks for all of the above. I am full of admiration for the way they cope but they are clearly under great pressure to accommodate the needs of the expanding population of Corsham. Shaunaks is small, not much storage space, the Staff are clearly run off their feet and there are usually long queues to be served , sometimes stretching outside. Not good in inclement weather!*
- 6.1.53.2 *As I don't have my own transport, I now have to catch a bus into either Bath or Chippenham to find a chemist and then there is the problem of carrying all of this home.*

6.1.53.3 *Please, please, please let us have another pharmacy in the Martingate Centre soon."*

6.1.54 [Reacted by NHS Resolution], who is an [Reacted by NHS Resolution] year-old widow, highlights the lack of space in Shaunaks Pharmacy and the queuing outside in inclement weather. It appears that [Reacted by NHS Resolution] is now forced to use a chemist in Bath or Chippenham, given the problems Shaunaks faces. This constitutes a round-journey of at least 7 miles and via public transport. She also highlights the issues of carrying all this medication home. For someone on a large amount of medication this may be tough or may not even be safe, especially for an [Reacted by NHS Resolution] year-old. [Reacted by NHS Resolution] finishes her letter by begging for a new pharmacy in the town centre.

6.1.55 [Reacted by NHS Resolution] (Email 19) writes:

6.1.55.1 *"We have regularly used Shaunaks for prescriptions since moving to Corsham in 2008 and have been highly satisfied with their service. However, the closure of Boots has had a serious impact on Shaunaks' ability to deliver a prompt and efficient service (this is not a criticism of their staff who are unfailingly helpful).*

6.1.55.2 *The extra workload has meant that I often have to queue outside; sometimes the great British weather is not to kind and my compatriots and I are somewhat wet by the end of our trip. Prescriptions are often not ready on the scheduled day and a further wait or a return trip are needed I would estimate this occurs in about 90% of cases.*

6.1.55.3 *The limited size of the shop means that seating for those waiting is limited and this is compounded when flu vaccinations etc are being held. The back room preparation of prescriptions is also at bursting point and there is no scope for an extension of the premises.*

6.1.55.4 *A further issue is that the extra demand for over the counter items means that what were normally available products may not be in stock. I believe this happens to me in something like 30% of instances.*

6.1.55.5 *With an increasingly elderly population with all the associated ailments and disabilities the demand on our one pharmacy will become even bigger.*

6.1.55.6 *As someone who requires regular prescriptions for [Reacted by NHS Resolution] different conditions I am a very frequent user of pharmacy services and the impact of the closure of Boots, without a replacement, means I most definitely receive a worse service than before and for someone approaching their late 70's this is not a good thing."*

6.1.56 [Reacted by NHS Resolution], who is in her late [redacted by NHS Resolution], highlights how she sometimes has to queue outside the Shaunaks Pharmacy and often has to come back to collect medication. Multiple trips to collect medication, especially when you have to wait outside in the rain, is clearly not representative of reasonable choice or access to pharmaceutical provision – especially for someone in their late [redacted by NHS Resolution].

6.1.57 [Reacted by NHS Resolution] (Email 22) who is a pensioner writes:

- 6.1.57.1 *"I would support any application for an additional pharmacy in Corsham. Since the closure of Boots and Sainsbury pharmacy the pressure has been on Shaunaks. It's not just Corsham but the villages surrounding. I am a pensioner and live in Neston and although I order my prescriptions well in advance I have found they are often not ready to collect and often have to queue outside sometimes in the rain or return on multiple occasions. Shaunaks is a small shop and they do their best but they are pushed."*
- 6.1.58 [Reacted by NHS Resolution], who lives in a surrounding village, also highlights how she has been forced to make multiple trips and wait in the rain when attending Shaunaks. This is clearly not representative of reasonable choice or access to pharmaceutical provision.
- 6.1.59 [Reacted by NHS Resolution] (Email 57) who describes herself as an elderly member of the Corsham community writes:
- 6.1.59.1 *"As a rather elderly member of Corsham community, I would like to add my comments of support to the opening of a second pharmacy in the town."*
- 6.1.59.2 *I have nothing but praise for Shaunak's surgery pharmacy, however because of the numbers of people requiring prescriptions, the shop is frequently full to capacity to the point where a member of staff needs to be on the door for crowd control - one out, one in from the queue."*
- 6.1.59.3 *Particularly unpleasant during wet and cold weather where people have to stand outside and wait."*
- 6.1.59.4 *Although there are other pharmacies in Chippenham and Box, at a time when one doesn't feel well or in pain, they would require a walk to the bus stop, a wait in the rain and then the same for the return trip."*
- 6.1.59.5 *It seems ridiculous that when a second pharmacy had been in the town (presumably with official approval) until Boots closed down recently, that another pharmacy cannot be allowed to just take its place."*
- 6.1.59.6 *It is increasingly common that certain medications are not always available at a particular pharmacy and this would give a second possible chance of getting the prescription filled."*
- 6.1.59.7 *Corsham is a small town of just under 14,000 people and expanding. The shops are in a central area of the town and accessible to people living in the wider radius around the centre."*
- 6.1.60 [Reacted by NHS Resolution] also highlights how patients are forced to queue outside in the rain at Shaunaks Pharmacy, and how there is dedicated crowd control such as the queues. [Reacted by NHS Resolution] also highlights how a pharmacy in the town centre will allow people to access services in the course of their daily lives.
- 6.1.61 [Reacted by NHS Resolution] (Email 75) writes:
- 6.1.61.1 *"We have found the closure of Boots pharmacy in Corsham a huge loss. We find it a long walk to Shaunaks in Beechfield Road. A Pharmacy in the centre of Corsham alongside other shops makes so much more sense."*

- 6.1.61.2 *We have had to register at Shaunaks which is a tiny store, we have to spend a lot of time queueing, sometimes the queue is so long it extends outside the shop. Our prescription is rarely ready and so we then have to wait in the store for the medication to be readied or face another journey back to the shop.*
- 6.1.61.3 *As they are so busy I would be reluctant to ask advice from a pharmacist as this would cause further delays to the people queueing and if I was feeling unwell could not face standing in a long queue. Shaunaks staff are helpful and do their best but I suspect they feel stressed and pressurised by the sheer volume of people they provide for. Mistakes happen in such circumstances.*
- 6.1.61.4 *Corsham needs to have another Pharmacy in a central position with sufficient space for consultations."*
- 6.1.62 [Reacted by NHS Resolution] again highlights the queues outside the door and the need for a return journey to collect medication. He mentions that he 'had' to register at the Shaunaks Pharmacy – we submit that this is because there is no choice to provision in Corsham.
- 6.1.63 He also raises the issue of patients being deterred from asking for advice due to how busy the store is. Being unable to ask your pharmacist for advice or for a Pharmacy First consultation due to how busy they are is clearly not representative of sufficient choice or access to provision.
- 6.1.64 [Reacted by NHS Resolution] (Email 90) has a terminally ill husband and notes:
- 6.1.64.1 *"I have heard that a new pharmacy request for Corsham has been turned down.*
- 6.1.64.2 *Having only one pharmacy is having a detrimental impact on my husband. He is terminally ill and requires lots of medication.*
- 6.1.64.3 *So far 3 times they have not had the medication he has requested. I had to drive around the area to find a pharmacy that had the medication.*
- 6.1.64.4 *On a personal note, when collecting medication from the only pharmacy in Corsham, I now have to work out the best time to collect, as the queues are so long. I am looking after my husband and can't leave him for long. It all adds to stress. We desperately need another pharmacy."*
- 6.1.65 Alongside the pressures of caring for a terminally ill husband, [Reacted by NHS Resolution] has the added stress of trying to time her visit to the oversubscribed Shaunaks Pharmacy to ensure she avoids queues and does not leave her husband alone for too long. This is terrible pharmaceutical access, and something someone in [Reacted by NHS Resolution]'s position should not have to go through.
- 6.1.66 [Reacted by NHS Resolution] (Email 102) who is [Reacted by NHS Resolution] from the Porch surgery – the surgery collocated with Shaunaks notes:
- 6.1.66.1 *"I am [Reacted by NHS Resolution] from the Porch Surgery and as such I'm well aware of how valuable pharmacy services are. Whilst Shaunaks are undoubtedly doing as well as they can, they simply don't*

have enough space to service the needs of Corsham and the surrounding areas.

6.1.66.2 *Their premises are often overcrowded for customers and there is clearly inadequate space for all of the staff. They are literally having to climb over each other to fulfil their roles, something that cannot be good for them. In addition, it must increase the risk of mistakes occurring.*

6.1.66.3 *Quite apart from the space issues at Shaunaks, a pharmacy / chemist provides a broad service to its local community. Corsham is of a size where it clearly warrants a town centre service. Many people, especially the elderly will come to Corsham town centre to do their routine shopping. Some will struggle to then get to Shaunaks if they are in need of pharmacy services. Even if they have their own transport, parking can be a real issue at the Porch.*

6.1.66.4 *On a personal level, I used to collect my prescription from Shaunaks but moved to Boots several years ago as it was clear Shaunaks were already overstretched and overcrowded.*

6.1.66.5 *With the closure of Boots I have had to revert to Shaunaks and as expected, the situation there, is now far worse."*

6.1.67 Being [Reacted by NHS Resolution] with direct links to the Porch Surgery, [Reacted by NHS Resolution] will be aware of local health needs and issues. He declares that Shaunaks do not have the requisite space to serve the Corsham population and talks about staff climbing over each other just to fulfil their roles.

6.1.68 He also highlight show residents access the town centre as part of their daily lives and parking is a struggle. Notably, like [Reacted by NHS Resolution], he raises concern about mistake being made due to the pressure the Shaunaks Pharmacy finds itself under.

6.1.69 [Reacted by NHS Resolution] (Email 319) writes:

6.1.69.1 *"We are desperate for a second pharmacy in the town following the closure of Boots as Shaunaks clearly can't cope with the sheer volume of work they are now expected to handle.*

6.1.69.2 *This manifests itself in various ways which I describe below:*

6.1.69.2.11 *I have had to wait over half an hour several times just to get a simple OTC product, which has on occasion been out of stock.*

6.1.69.2.2 *Prescription medicine, including HRT has been unavailable meaning a further visit and more queueing*

6.1.69.2.33 *I have had to queue for 20 minutes behind those waiting for medicines to get a vaccine*

6.1.69.2.44 *Error in prescription causing me to take the wrong product which could have caused serious illness*

6.1.69.2.55 *The staff are obviously rushed off their feet and you can physically see the backlog of product awaiting pickup*

6.1.69.2.66 *I have witnessed elderly people getting upset and panicky because their prescription has not been ready or some items missing*

6.1.69.2.77 *My [Reacted by NHS Resolution] in law was in urgent need of an inhaler for his [Reacted by NHS Resolution] which was not available, he could have died!*

6.1.69.3 *This will only get worse with more new housing already being built around the town and a clearly elderly population which is only going to need more service."*

6.1.70 [Reacted by NHS Resolution] highlights a number of issues but of most concern is point 4 where she highlights an error in prescription caused her to take the wrong product. This is clearly dangerous and mistakes are being made as Shaunaks are overwhelmed. We submit that for the safety of the local population, this cannot continue and there is a need for a 2nd pharmacy in Corsham.

6.1.71 The above examples are only a scratch on the surface of the real problems that are present in Corsham. We urge the Committee to take the time to read each individual email and experience as there are numerous examples like the ones used above.

6.1.72 For the benefit of the Committee, we have also categorised the complaints received in the email/ letters, so they can gauge the scale of the problems within Corsham. These categories constitute:

6.1.72.1 Queues faced by patients of Shaunaks Pharmacy

6.1.72.2 Capacity issues faced by Shaunaks Pharmacy

6.1.72.3 Difficulty in accessing pharmacies by bus

6.1.72.4 Difficulty in accessing pharmacies by foot

6.1.72.5 Difficulty in accessing pharmacies by car (parking)

6.1.72.6 Difficulty in accessing a pharmacy as part of residents daily lives

6.1.72.7 Difficulty accessing pharmacies at lunch time

6.1.72.8 Deteriorated service levels at the Shaunaks Pharmacy

6.1.73 **Queues faced by patients of Shaunaks Pharmacy**

6.1.74 By far and away the largest issue faced by residents is having excessive queues to collect medication from Shaunak's. Below we provide a staggering 21 pages of quotes referencing emails we have received. Many emails talk about queuing in the car park in the rain – this is clearly not representative of reasonable access or choice to pharmaceutical provision.

6.1.75 Additionally, given the volume of emails received, it appears that these queues are not isolated incidents and in fact a regular occurrence.

- 6.1.76 *"Shaunaks is far to [sic] small, you can go in and long very slow ques. [sic] they say 5 days to get prescription ready and I go in after 7 days and still not made up, this happens nearly every time I go in, not a lot of choice on general products they sell as I can't buy on line."* (Email 5)
- 6.1.77 *"In addition to the recent closures of Boots pharmacy and Lloyds pharmacy (the latter located nearby in Sainsbury's, a mile or so down the A4) the Corsham area has, over recent times, experienced a considerable population increase, exacerbating the already difficult operating conditions that Shaunaks has to deal with. My own experience concerns unacceptable waiting times, queuing, and a lack of seating availability."* (Email 6)
- 6.1.78 *"There are more than 10,000 people living in Corsham and we currently have only one pharmacy (Shaunaks). That is not enough. Even when Boots was operating, so there were two pharmacies in Corsham, we would have to wait in long queues in both pharmacies. Now, with only Shaunaks, the queue to get a prescription is long and time consuming."* (Email 7)
- 6.1.79 *"Previously I got my prescription medicine from Boots, but since it closed, I have used Shaunaks. The queuing is often excessive and I have left the queue, because of the small space within the shop and the coughing and sneezing around me. Boots was a larger shop and had much less queuing as a result."* (Email 8)
- 6.1.80 *"My husband and myself have experienced real delays and queues and difficulties when picking up medicines from Shaunaks. They have absolutely done their best under difficult circumstances but the demand is too great."* (Email 9)
- 6.1.81 *"This is absurd - Corsham is a swiftly growing quite large community now, and having the availability of only one small pharmacy (Shaunaks, attached to The Porch Surgery) is far from adequate to serve so many. Often it is overwhelmed, has long waiting times to be served and on many occasions, (even in the past when Boots was still in operation), has queues formed outside the door."* (Email 10)
- 6.1.82 *"Shaunaks is doing an amazing job, but is overwhelmed by the numbers queuing outside daily requiring prescriptions etc."* (Email 11)
- 6.1.83 *"Now widowed and at the age of [redacted by NHS Resolution] years, I have quite a walk to reach Shaunaks for all of the above. I am full of admiration for the way they cope but they are clearly under great pressure to accommodate the needs of the expanding population of Corsham. Shaunaks is small, not much storage space, the Staff are clearly run off their feet and there are usually long queues to be served, sometimes stretching outside."* (Email 12)
- 6.1.84 *"I have queued for perhaps half an hour on every visit, more so on occasions. This pharmacy is failing; it is swamped, despite the outstanding efforts of its staff, led by an exemplary manager. There are always people in front and behind of me in the queue immediately the moment the door opens. Some 3 or 4 people are usually on chairs awaiting their prescriptions to be filled."* (Email 13)
- 6.1.85 *"Their level of service has diminished due to the increased demand and the footprint of Shaunaks does not lend itself to this; invariably with queues out the shop door. Moreover, prescriptions are now either late in preparing or are lacking key components when made available."* (Email 15)

- 6.1.86 *"Since the closure of Boots the queues in Shaunak are now large and often there are delays receiving required prescriptions. Myself, my husband and my daughter all rely on regular prescriptions." (Email 16)*
- 6.1.87 *"Since Boots has closed each time that I have gone to Shaunaks Pharmacy, there have been long queues and on several occasions they have had stock shortages and I have not been able to get what I needed." (Email 17)*
- 6.1.88 *"I am lucky enough to live not far from Shaunaks Pharmacy but the closure of Boots in the town centre has resulted in long queues, additional cars in the surgery car park and nearby roads and longer waits for prescriptions being made up. I was recently at the back of a queue of 8 and had a long wait as, of course, some people in front of me also wished to purchase over the counter medicines." (Email 18)*
- 6.1.89 *"The extra workload has meant that I often have to queue outside; sometimes the great British weather is not to kind and my compatriots and I are somewhat wet by the end of our trip. Prescriptions are often not ready on the scheduled day and a further wait or a return trip are needed. I would estimate this occurs in about 90% of cases." (Email 19)*
- 6.1.90 *"Whilst the current pharmacy Shaunaks are doing their best , the poor girls working there are basically under siege from the moment they open until close . Queue's are out of the door and stress levels of both staff and clients are reaching boiling point." (Email 21)*
- 6.1.91 *"I am a pensioner and live in Neston and although I order my prescriptions well in advance I have found they are often not ready to collect and often have to queue outside sometimes in the rain or return on multiple occasions. Shaunaks is a small shop and they do their best but they are pushed." (Email 22)*
- 6.1.92 *"Sir - although Shaunak's provides a good service, since Boots has closed in the town, I have found waiting times for prescriptions have increased and queuing in the pharmacy is more frequent." (Email 24)*
- 6.1.93 *"Every time I've tried to shop at Shaunaks Pharmacy, next to the Porch Surgery, there has been a huge queue which means a very long wait, often stretching to outside. The stress of working there must be awful, they clearly come across some very anxious, and therefore verbally aggressive customers as there are signs asking people to be kind and patient." (Email 25)*
- 6.1.94 *"I used Shanuks for a while but was beginning to find it difficult to pick up my prescriptions due to queues when they also became a vaccine hub, so I switched to Boots." (Email 26)*
- 6.1.95 *"Shaunaks, the only remaining pharmacy in the town, are working so hard to keep everyone supplied with their medication etc but they are totally overwhelmed now! There are constant queues in the shop despite the staff working really hard to keep their heads above water, and they don't even have enough space to store all the made-up prescriptions anymore." (Email 28)*
- 6.1.96 *"Since BOOTS closed, Shaunaks have not been able to cope, leading to long delays before prescriptions are ready, a notable lack of medicines being held by pharmacy so I.O.U. notes being issued, leading, of course, to more queues [sic], possibly in the cold and rain...Faced with such long queues [sic] people are turning to supermarkets for over the counter medicines and other non-prescription items." (Email 30)*

- 6.1.97 *"The only pharmacy, Shaunaks, is far too small to cope on its own with the population of Corsham. Queues are often outside and sometimes there is a 'bouncer' on the door to marshal the people waiting!!" (Email 33)*
- 6.1.98 *"I'm currently on regular medication(x items a day) and have found Shaunaks is busier, invariably a queue of at least 4 or more and the staff clearly more pressed. The staff seem to struggle to keep up with demand and I always allow longer for routine repeat prescriptions to be made, than the Porch Surgery guidance indicates." (Email 34)*
- 6.1.99 *"It's quite a walk when my meds are due which is usually a box full. I'm [redacted by NHS Resolution] with [redacted by NHS Resolution]. The difficulties are queuing, sometimes right round the block. Shaunaks are totally overwhelmed some days leading to the presence of a Marshall." (Email 37)*
- 6.1.100 *"Very often there is queuing outside the door, not ideal in winter months. Prescriptions are often not ready, due to pressure of numbers, so patients can either queue up and wait or return another day if not urgent." (Email 39)*
- 6.1.101 *"The poor staff in Shaunaks are extremely over worked. The queue is always over loaded." (Email 42)*
- 6.1.102 *"Since the closure of Boots I have found the queues at Shaunaks most unacceptable and have on some occasions been left standing outside in the rain. Parking is a problem with traffic backing out to the public road on many occasions." (Email 43)*
- 6.1.103 *"Since Boots closed, Shaunaks, which is the only remaining pharmacy is ridiculously busy...There is always a large queue, often outside the building, and congestion in and around the car park." (Email 46)*
- 6.1.104 *"Shaunaks has a few items on their shelves but they are often hidden by people queuing...Shaunaks is a small pharmacy which benefits from being next to the surgery but unfortunately it cannot cope with the demand for prescriptions to be dispensed. There is no where to sit outside to wait when queuing [sic]." (Email 47)*
- 6.1.105 *"As a pensioner I am finding it much harder to queue for my prescriptions now that Boots has shut. More often than not I also have to wait for the dispensing of them." (Email 48)*
- 6.1.106 *"There are always long queues outside the pharmacy with no shelter from bad weather or anywhere for the less able to sit and the small car park that serves both the surgery and the pharmacy is always crammed." (Email 49)*
- 6.1.107 *"Corsham badly needs another pharmacy. It is not acceptable that you have to queue for so long when visiting Shaunaks for medication" (Email 52)*
- 6.1.108 *"There are often queues at Shaunaks and building going on in and around Corsham which will not improve the situation." (Email 53)*
- 6.1.109 *"Despite their best efforts, it appears the staff are unable to keep up with this increased workload, leading to long wait times, queues extending outside the store, and delayed access to necessary medications." (Email 55)*

- 6.1.110 *"We have personally encountered queues stretching out of the door and had several instances where prescriptions have not been ready for collection, even after a week or more." (Email 56)*
- 6.1.111 *"I have nothing but praise for Shaunak's surgery pharmacy, however because of the numbers of people requiring prescriptions, the shop is frequently full to capacity to the point where a member of staff needs to be on the door for crowd control - one out, one in from the queue. Particularly unpleasant during wet and cold weather where people have to stand outside and wait." (Email 57)*
- 6.1.112 *"I have lived in Corsham for [redacted by NHS Resolution] years and there has always been an issue with queuing at the local pharmacy. I was very concerned when Boots closed because that would double the number of people queuing at the only pharmacy left." (Email 59)*
- 6.1.113 *"It's a town now not a village! I'm an OAP and object to having to que [sic] in the rain as there is often no space inside ." (Email 62)*
- 6.1.114 *"Shaunaks is so overworked the staff are unable to cope - very long queues are every day and all day. People have to wait so long, tempers rise and causes serious problems." (Email 66)*
- 6.1.115 *"And why are we having to walk all the way to Shaunaks when we are old and some of us infirm. Queues add to the problem and time of course." (Email 69)*
- 6.1.116 *"Although Shunaks [sic] have tried to give a good service they seemed to be overwhelmed some days, I am having to queue sometimes to collect my repeat prescription something I never had to do when we had two chemists." (Email 71)*
- 6.1.117 *"My [redacted by NHS Resolution] in law lives in Rudloe and is complaining that there is always a long queue at Shaunaks." (Email 72)*
- 6.1.117.1 *"a/ The queues are so long at Schaunaks [sic], that I end up going back home which has made my medication late on several occasions*
- 6.1.117.2b/ *Generally, people attending a pharmacy are people that are "unwell." The last thing they want on entering the shop is to join a long queue, then when they have reached the counter get told, " it's not done/ they don't have the script. Could you come back tomorrow/later/next week or join yet Another queue and wait for it to be done." This is Not acceptable. I have been in this position many times and I now dread going to the pharmacy.*
- 6.1.118 *If you don't feel well for whatever reason, you want to go in, collect your prescription and go home. This now Never happens. Call before you attend? No chance, you can rarely get through and if you do, you still have to wait when you get there." (Email 73)*
- 6.1.119 *"We have had to register at Shaunaks which is a tiny store, we have to spend a lot of time queueing, sometimes the queue is so long it extends outside the shop. Our prescription is rarely ready and so we then have to wait in the store for the medication to be readied or face another journey back to the shop." (Email 75)*
- 6.1.120 *"I work full time and long hours, often away on business so have limited opportunities to collect medication for myself or my wife. The queues in*

Shaunaks, coupled with the fact that it closes for lunch makes it extremely difficult to get medicine or pharmaceutical products when I need them.” (Email 77)

- 6.1.121 *“The situation was completely unsatisfactory prior to the closure of Boots (in terms of the service provided and queuing times) and a Pharmacy that despite its very best efforts was unable to provide an acceptable service by any measure.” (Email 79)*
- 6.1.122 *“The closure of Boots Pharmacy in the town centre of Corsham will cause additional pressure on Shaunak’s the remaining pharmacy which is already oversubscribed with queues often causing waiting times exceeding 15 minutes or more , not through any other reason than too many patients.” (Email 80)*
- 6.1.123 *“My wife and I have both had to collect prescriptions from them and even if the script had been received several days earlier they have often not had a chance to fulfil the order. Therefore we had to wait in a queue of 6 or 7 for it to be filled.” (Email 81)*
- 6.1.124 *“The Shaunaks dispensary itself is far to [sic] small to deal with the amount of footfall it receives, and whilst the staff work hard and are extremely pleasant to deal with, there is always a long queue to contend with, and prescriptions are rarely ready when called for, even after a wait of 5-7 days.” (Email 82)*
- 6.1.125 *“Before Boots Pharmacy closed, Shaunaks was a very small busy pharmacy, whose turnaround time for dispensing prescriptions had only increased and there was often a small wait or queue for prescriptions [sic]. However, since Boots Pharmacy has closed, the service has gone downhill alarmingly.” (Email 84)*
- 6.1.126 *“I have already emailed you with concerns over the problems with having only one pharmacy for the size of our population, with long queues, not just for collecting prescriptions (I always allow several days) but, obviously, shoppers also wish to buy additional items when they reach the desk.” (Email 85)*
- 6.1.127 *“When I get to the pharmacy they are usually queuing out the door. When I eventually get to the counter my prescription is never ready and I have to wait even though it has been several days since the prescription has been requested.” (Email 86)*
- 6.1.128 *“On a personal note, when collecting medication from the only pharmacy in Corsham, I now have to work out the best time to collect, as the queues are so long. I am looking after my husband and can’t leave him for long.” (Email 90)*
- 6.1.129 *“I waited for over 20 minutes to pick up a prescription for my [redacted by NHS Resolution]-year-old mother at Shaunaks the other weekend...The long queue at Shaunaks is not something that she can comfortably negotiate & I know there are many others in her position.” (Email 91)*
- 6.1.130 *“Since Boots closed I have spent many hours queuing in Shaunaks. I do have to take quite a lot of medication so have to go there fairly often. The staff are always very helpful even though the queue is around the shop and out the door.” (Email 92)*
- 6.1.131 *“Shaunak’s is doing a great job but they are completely swamped by demand, I collect my prescriptions only monthly but on every visit, the queue is at least 8/10 people deep, and the poor staff in there are under so much pressure and*

I've even heard customers swearing in there which is so unnecessary but you can understand people's frustration as we all live such busy lives nowadays."
(Email 93)

- 6.1.132 *"We have found that since Boots has been closed we have to wait in very long queues out of the door and through the Drs carpark at Shaunaks. They are doing their best, but having to wait over 30 minutes to hand in a prescription and then another 15 mins or more to pick up a prescription with small children is really difficult."* (Email 94)
- 6.1.133 *"But the small pharmacy is "pushed to its limit" with on occasions queues extending outside the building, the willing staff at times struggling to cope with demand, and notices posted requesting customers to be patient, suggesting at times they are not."* (Email 95)
- 6.1.134 *"Anyone who doubts that should spend the day at our remaining pharmacy, Shaunaks, where there are long queues and the poor staff have to cope with the large backlog from previous Boots customers. "* (Email 96)
- 6.1.135 *"Shaunak's consistently appeared to be very busy and crowded with queues often spilling over outside. This state of affairs is now exacerbated since the closure of Boots."* (Email 99)
- 6.1.136 *"Shaunaks are totally overwhelmed, the service there has become very slow – frequently 20 mins to get to the front of the queue with a new prescription and same to pick it up, five days wait for a repeat prescription to be fulfilled and very narrow range of otc medications."* (Email 101)
- 6.1.137 *"How Corsham can only have one pharmacy is beyond belief the queues we have to wait in are just too much especially for the elderly people in Corsham."*
(Email 103)
- 6.1.138 *"On each occasion of visiting there were people queuing out the door, people were hanging around in the car park, there was nowhere warm or dry to wait, only the first handful of people could get inside...I waited 20 minutes in the queue on both occasions: the first time I had to give up before reaching the front of the queue to walk because I had a bus to catch back in town."* (Email 104)
- 6.1.139 *"Corsham, population 13432 sadly only have 1 pharmacy and that one very small chemist is overwhelmed now boots has gone, there are long queues, delays and sometimes very angry and frustrated customers which make it extremely uncomfortable for the hardworking staff there."* (Email 108)
- 6.1.140 *"I know of several elderly people who live in accommodation close to the town centre, who struggle to walk the distance from their homes to Shaunaks, only to find an inevitable queue and long waiting time."* (Email 109)
- 6.1.141 *"Shaunaks are struggling to cope with a substantially greater trade. It is a small shop and there is almost always a long queue waiting to be served, frequently stretching out of the door."* (Email 111)
- 6.1.142 *"Shaunaks are a very good pharmacy but its just not enough, you cannot go there to get your prescription or any other products without having to wait in a long queue."* (Email 112)

- 6.1.143 *"I personally struggle to get my prescriptions as I work full time and when I get to Shaunaks, the queues are very long and everyone is moaning about how long it takes to get served." (Email 113)*
- 6.1.144 *"Shaunaks is a small shop, and the volume of people entering is high - an easy breeding ground for flu/covid etc, as well as there often being a queue, which I struggle to stand in." (Email 117)*
- 6.1.145 *"Despite the staffs valiant efforts they are overwhelmed. Queues often fill the pharmacy and have even overflowed out of the door." (Email 118)*
- 6.1.146 *"Shaunaks staff are working so hard to keep things going with the supply of medicines etc but every time I attend the chemist to collect my mothers medication I always have to join a long queue and despite putting the prescription in, in plenty of time normally 2 weeks before collection it is rarely ready and then I wait to have it made up, putting more pressure on the staff." (Email 119)*
- 6.1.147 *"There is always a queue and the staff can barely cope with the influx of so many people requiring prescriptions, let alone trying to make purchases." (Email 120)*
- 6.1.148 *"I have heard many people say that they have experienced long waits for their essential medication in queues at Shaunaks." (Email 121)*
- 6.1.149 *"Our one pharmacy is overwhelmed, often with 15 or 20 people queuing for up to an hour only to be told they've run out of the medicine required." (Email 123)*
- 6.1.150 *"When I pick up my medication I regularly have to queue outside the pharmacy; this is very unpleasant in bad weather and may affect the health of elderly persons." (Email 125)*
- 6.1.151 *"There has been a terrific building expansion in the Corsham area which has increased the population enormously, that and the small size of the existing pharmacy inevitably means large queues forming while waiting to be served...These queues are sometimes leading out of the door, another pharmacy would be very useful especially if you are an older person who needs a bus to get into the town centre as no bus passes the existing pharmacy." (Email 130)*
- 6.1.152 *"When you are queuing outside in the rain alongside the elderly, people who have visited the GP and are obviously poorly it is a ridiculous situation which could be avoided if an additional facility was available." (Email 131)*
- 6.1.153 *"Currently the only local pharmacy (Shunaks) cannot cope with the overwhelming demand for services so queues are extensive and it's locality is not easily accessible for those with reduced mobility." (Email 133)*
- 6.1.154 *"I've waited ages in queues, had to come back in 20 minutes etc. and it must be so stressful for Shaunaks. Shaunaks is very small and has a limited range of medically related items due to lack of space." (Email 134)*
- 6.1.155 *"Since Boots withdrew and closed their store in Martingate, I have had to go to Chippenham for my medication. Shaunak's clearly cannot cope with the workload and there is a constant queue of at least 1/2 hour during opening hours." (Email 135)*

- 6.1.156 *"I have had to wait over half an hour several times just to get a simple OTC product, which has on occasion been out of stock."*
- 6.1.157 *2 Prescription medicine, including HRT for my wife has been unavailable meaning a further visit and more queueing*
- 6.1.158 *3 I have had to queue for 20 minutes behind those waiting for medicines to get a vaccine" (Email 136)*
- 6.1.159 *"The queues are often out of the door and the waiting time there is often 20-30 minutes which is far too long for busy working people." (Email 137)*
- 6.1.160 *"The few times I have had no choice, I have discovered long queues out the door. Multiple occasions being caught in a torrential downpour due to an inability to fit everyone in the shop." (Email 138)*
- 6.1.161 *"It is always overcrowded, sometimes the queue stretches outside the door into the open air, and a fair distance to walk if you are resident in the town." (Email 141)*
- 6.1.162 *"I am sure Shaunaks are doing their best the long queues, delays in getting prescriptions and lack an access to a pharmacist are ever present." (Email 142)*
- 6.1.163 *"Also the queues can be out of the door at Shaunaks, and you still have to wait for your prescription on top of that as the are so busy." (Email 143)*
- 6.1.164 *"A single pharmacy for a town the size of Corsham is impractical and unfair to the local population. The current pharmacy is too small, too busy and the queues re too long." (Email 148)*
- 6.1.165 *"But queuing outside for 20-30 minutes and waiting to be let in by the bouncer on the door is hardly the ideal service. That's hard for the elderly." (Email 150)*
- 6.1.166 *"As I working person I do not have time to stand around in a queue during my lunch break which is always the case at Shaunaks." (Email 151)*
- 6.1.167 *"There are always queues in this small shop tailing back outside and the delays in getting served mean that I now choose to shop for over the counter medications and first aid items by driving to Sainsburys or into Chippenham." (Email 155)*
- 6.1.168 *"Shunaks is always overcrowded and on a recent visit to buy medication from the shop, I had to queue outside and was prevented from going in as there was a limit of six in the shop at a time." (Email 156)*
- 6.1.169 *"Shaunaks are totally overwhelmed with work and I witness frequent queue at the premises, they do not have time for meaning full consultations as the government expect us to seek to take the pressure off our only Doctors Practice." (Email 157)*
- 6.1.170 *"The queue for service frequently stretches into the car park and on several occasions I have to stand in a queue in the rain." (Email 159)*
- 6.1.171 *"There are often long queues, prescriptions are taking longer to prepare, items of everyday requisites, including over the counter medicines are often out of stock." (Email 160)*

- 6.1.172 *"After Boots shut, I tried Shaunaks near Springfield for 4 months, but was frustrated by the HUGE queues, the resulting overcrowded nature of the pharmacy and the very slow service."* (Email 161)
- 6.1.173 *"Shaunaks always has a long queue waiting, though the staff are working hard, and although it is convenient for the surgery it is a long walk from the centre of the town."* (Email 162)
- 6.1.174 *"There are always queues in the small shop, with people waiting to be served for purchases or prescriptions, the 2 or 3 chairs are usually occupied with people waiting for prescriptions...There is a small, cupboard size 'office' for consultations with a pharmacist, with customers queuing outside the door in close proximity, there is no privacy."* (Email 163)
- 6.1.175 *"In support of this appeal I must point out that, since the close of Boots, every time I visit Corsham Pharmacy there is a queue of 8 to 10 people waiting to be served."* (Email 164)
- 6.1.176 *"I need to collect medication monthly from Shaunaks and every time I have had to wait in a long queue before being attended to."* (Email 165)
- 6.1.177 *"There are often long queues including people queueing outside, tempers often get frayed as a result and the staff try their best but are trying to deal with sometimes sensitive situations at speed in order not to irritate others in the queue."* (Email 166)
- 6.1.178 *"My wife and I have been registered with Shaunaks since 2004 and it has always been a very busy pharmacy with regular queues and waiting times for medication. Corsham has expanded greatly over the last twenty years and now with the closure of the Boots pharmacy the queues and waiting times at Shaunaks have become totally unacceptable. Queues start at Shaunaks upon opening and continue until closing time regularly stretching to well outside and this during all weathers."* (Email 169)
- 6.1.179 *"I have been forced to queue in the rain outside Shanaks as the shop is small . Prescriptions are there but I have been giving unto 10 days notice to avoid queuing for nothing."* (Email 170)
- 6.1.180 *"There is generally a very large queue for prescriptions (sometimes going right out the door) which means if you just want to buy something or you want advice on anything, you need to join the queue and hope that what you want to buy is in stock. It is also practically impossible to look round the shelves because there isn't room because of all the people queueing."* (Email 172)
- 6.1.181 *"I have had to queue for anything up to an hour to get served by Shaunaks because of the volume of work they are getting. Bearing in mind that their premises are not very large this often means waiting out in the cold and/or rain."* (Email 173)
- 6.1.182 *"My personal experience of having only one chemist (Shaunaks) serving Corsham are summarised below:-*
- 6.1.182.1- *The shop is always very busy, often with a queue of people waiting to be served.*
- 6.1.182.2- *Prescriptions are rarely made up ready for collection, even when they have been received by the pharmacy some 4 days earlier*

resulting in having to wait around or call back later whilst they are being dispensed.” (Email 174)

- 6.1.183 *“The wait times at Shaunaks have increased hugely to the point where the queue has extended into the car park on a number of occasions, leaving customers standing in the rain whilst waiting for prescriptions, completely unacceptable, bearing in mind that many are unwell and elderly.” (Email 175)*
- 6.1.184 *“I regularly queue up to be served and can only feel sorry for the staff who are working under these conditions.” (Email 177)*
- 6.1.185 *“I join the queue regularly, waiting in line to be served and can only feel sorry for the staff putting up with these stressful conditions.” (Email 178)*
- 6.1.186 *“If I ever need to visit Shaunaks, the queue is often very long and sometimes out of the door.” (Email 179)*
- 6.1.187 *“The nearest Pharmacy is Shaunaks by the Porch Surgery, which is quite isolated and constantly busy, under great pressure with long queues.” (Email 180)*
- 6.1.188 *“Now I have to queue outside the pharmacy and I can be there twenty to thirty minutes. I often see the queue and leave thinking I will collect my medication another day. Another day comes and it is the same. I eventually have to queue as I need my medicines.” (Email 181)*
- 6.1.189 *“Shaunaks isn’t a viable alternative for such a large catchment area for several reasons; it’s out of the town centre and parking (if one has use of a car) is often difficult/not available, there are usually long queues for service (often stretching outdoors) and their stock of OCMs is very limited.” (Email 182)*
- 6.1.190 *“On most occasions the waiting queue for collecting prescriptions snakes around the shop preventing easy viewing of products for sale on the shelves...On occasions the queue spills out onto the path outside which is open to the elements.” (Email 183)*
- 6.1.191 *“I have been to Shaunaks on a few occasions since the closure of Boots and each time have had a long queue time. The shop has been packed out with people also queuing outside (including customers who look vulnerable and uncomfortable).” (Email 185)*
- 6.1.192 *“Waiting to collect a prescription you usually end up outside in a long queue and no facilities when raining. We now have to wait over a week and sometimes still not ready.” (Email 186)*
- 6.1.193 *“Although there is a consultation room it is small and if you are queuing outside the door you can hear the ‘confidential’ consultation.” (Email 187)*
- 6.1.194 *“There is usually a long queue at both making asking for advice difficult.” (Email 188)*
- 6.1.195 *“When visiting there are always queues to be served. The staff do their best they but the area is too small to cope with the number of customers.” (Email 189)*
- 6.1.196 *“The impact of the closure of boots has been very damaging, forcing people to just simply have the one pharmacy and it's a big struggle , constantly having*

to queue for a long time, having to wait outside, Shaunaks does not even provide much items , older people are really struggling being made to travel out of town !" (Email 190)

6.1.197 "Since the closure of Boots it has been a real struggle to get prescriptions and other items due to only having Shaunaks there are long wait times long queue having to sometime having to wait long times outside or having to come back and not being able To take medicine" (Email 191)

6.1.198 *"The following effects have been experienced by me, since Boots Pharmacy has closed:*

6.1.199 *Longer waiting times/queues to be served Delays in picking up a prescription for a neighbour/friend and much time wasted giving evidence of when the previous prescription was sent thus creating longer waiting times for those in the queue and causing unnecessary and extra stress to the staff member involved, Waiting outside in the rain/cold, Anger from some of the public due to having to wait."* (Email 195)

6.1.200 *"Often there are long queues and when I finally get the counter my prescription is not ready and I then have to wait again for it to be made up. A usual visit to collect a prescription can take 30 mins or more...On Saturdays there is a member of the public to act as security due to the size of the queues."* (Email 197)

6.1.201 *"Without commenting on how well run it is, my observation is that every time I pass (which is often) there is a long queue that extends outside of the shop"* (Email 199)

6.1.202 *"There are often queues - on my last visit I was asked to wait outside until the queue had gone down. I was lucky as it was a dry day."* (Email 203)

6.1.203 *"Since the closure of Boots I have had to travel into Chippenham to get non-prescription medication and toiletries because there are always such queues at Shaunaks; it is small and cramped and doesn't hold a lot of products and there is often a wait to get to the counter. In collecting prescriptions, there is always a queue and then a wait, as they rarely have the prescription ready."* (Email 204)

6.1.204 *"The lack of space in the premises makes it very difficult to provide privacy as there are often several people waiting for prescriptions and the queue sometimes frequently outside the building. It is clearly unreasonable to expect people who are unwell or frail to stand and queue particularly when winter pressures exacerbate the situation"* (Email 205)

6.1.205 *"Both pharmacies were quite different too - Boots there were more products and make up to pick up when passing whereas Shaunaks is too small for such a shopping experience (at the moment you can't get near the shelves to look as people are queued up or waiting and in the way) but great for collecting prescriptions. I feel sorry for the staff at Shaunaks - run off their feet, abused by impatient people (I've stood in the queue and seen it), and the size of the pharmacy is not fit for purpose. There aren't enough chairs for elderly who are waiting as it's so small. There is no privacy because of the queues if you need to ask the pharmacist about something or go in the tiny "private" room where everyone stood outside in the queue can hear everything. I want to be able to have a choice of pharmacy and not have to stand in a queue for 20+ minutes."* (Email 206)

- 6.1.206 *"As someone who relies on multiple medications on a daily basis, I am very well aware of the pressure that the only surviving chemist in Corsham is under. It was already under pressure with constant queues out of the door, even before Boots closed."* (Email 207)
- 6.1.207 *"The queue is always at least people long and often longer so that I have to leave and come back later."* (Email 209)
- 6.1.208 *"Shaunaks staff try their best but they have to put up with never ending queues of people (always queues out of the door) and as a result people get anxious, upset, cross and often rude. They even need a volunteer 'bouncer' on the door on a Saturday- dealing with often very grumpy people and ensuring that only 7 people are in the chemist at one time. They are not allowed to put seating out due to H&S so when I was queuing outside on Friday and again on Saturday there were frail elderly people standing outside. I was so concerned that I let them (3 each time) go in front of me. I queued for 30 mins plus each time."* (Email 210)
- 6.1.209 *"Several times I have had to queue outside Shaunaks in queues of ten people plus and occasionally in the cold and rain as there is no shelter there. I feel the cold very badly and cannot stand for lengthy periods...Often, after queuing for some time I find that the pharmacy does not even stock the product that I need and then I have to travel to Chippenham or Bath."* (Email 211)
- 6.1.210 *"1) Much longer waiting times, with queues often out the door and several people waiting for their prescriptions to be prepared"* (Email 212)
- 6.1.211 *"Shaunaks is so busy, often queuing out of the door, that it is not possible to pick up these kind of items, not to mention that it is not in the centre of the town so not at all convenient."* (Email 213)
- 6.1.212 *"The queues outside the only remaining pharmacy tell their own story."* (Email 216)
- 6.1.213 *"The town had a minimum population of 13,000 in 2021 and the existing pharmacy (Shaunaks) is patently unwilling or unable to cope with the level of demand in the town with queues a frequent occurrence and, despite the best efforts of staff, often provides a poor service"* (Email 223)
- 6.1.214 *"Apart from the challenge of getting to Shaunaks, we have experienced long waits in long queues to collect our prescriptions. Some of those queuing do not appreciate the problems which Shaunaks staff now face with their workload doubled, and are impatient and sometimes abusive towards them."* (Email 224)
- 6.1.215 *"There is always a queue for prescriptions in Shaunaks, and one often has to wait, with limited space and seating. When vaccination time comes round for Covid and 'flu, we have often had to queue outside Shaunaks because of the limited space inside."* (Email 225)
- 6.1.216 *"I think it's really important to have a pharmacy in the centre of Corsham, Shaunaks are doing their best, but it's so busy you always have to queue."* (Email 226)
- 6.1.217 *"I've had to queue outside many a time, not good for a Vulnerable OAP with a paralyzed leg."* (Email 228)

- 6.1.218 *"Since Shaunaks is now the only pharmacy within this vicinity we have seen an impact on the queues when collecting medication or 'popping' in to buy some child's medicine or simple remedy. The waiting time has increased if I have to wait for a prescription, the queue's are often longer and with more challenging individuals for an already stressed staff to deal with." (Email 229)*
- 6.1.219 *"My father was unable to stand for the length of queues on some occasions, and there is almost no space to sit down." (Email 231)*
- 6.1.220 *"I'm told that currently the queues are 'round the block' if prescription medication is required." (Email 233)*
- 6.1.221 *"I have had to wait in long queues. I usually have to wait whilst my prescription is made up. I now go 2 or 3 days after the date given for collection as I know it will not be ready." (Email 234)*
- 6.1.222 *"The present situation has resulted in long queues standing in the rain outside the remaining pharmacy." (Email 237)*
- 6.1.223 *"I have gone to Shaunaks after five working days, queued for in excess of 45 minutes to be told the prescription is not ready and waited an additional 20 minutes. This has happened only since the Boots pharmacy's closure." (Email 238)*
- 6.1.224 *"There is always a very long queue, sometimes out of the door, and despite the staff working as fast as they are able it is simply wrong that we have one pharmacy for a town of Corsham size" (Email 241)*
- 6.1.225 *"Since Boots closed I have had to go to Shaunaks, just outside the town centre and not only is there a constant queue" (Email 242)*
- 6.1.226 *"The wait time and queue was so long that after 20mins of waiting we had to leave." (Email 243)*
- 6.1.227 *"Queues at Shaunak are now considerable. On one occasion I had to wait outside in the rain because of the lack of space." (Email 244)*
- 6.1.228 *"Queues are often out of the door." (Email 245)*
- 6.1.229 *"they are struggling to cope. Queues are long and queries take time to sort out" (Email 247)*
- 6.1.230 *"There is always queuing as they have obviously too much work." (Email 249)*
- 6.1.231 *"Whoever drew that conclusion has obviously never stood in the queue at Shaunaks trying to get a prescription for their disabled partner. It is absolute chaos there" (Email 250)*
- 6.1.232 *"It has also become noticeable that the queueing time in-store has increased – often there are 5-6 people waiting for service." (Email 251)*
- 6.1.233 *"Shaunaks but there is an almost continuous queue !" (Email 252)*
- 6.1.234 *"I frequently experience long queues and overcrowding in Shaunaks... I often have to queue for a long time to get my prescription" (Email 253)*

- 6.1.235 *"Sometimes they have had to employ a 'bouncer' to manage the queue."* (Email 253)
- 6.1.236 "Shunaks is often stuffed for parking and very queuey," (Email 254)
- 6.1.237 "I didn't switch to Shaunaks because of the long queues" (Email 256)
- 6.1.238 "I cannot stand in a queue for ages which is what is now happening at Shaunaks due to the closure of Boots." (Email 257)
- 6.1.239 "There is often very little choice of over-the-counter remedies, and the queues are long with people whose only current option is to use this pharmacy for the prescriptions." (Email 261)
- 6.1.240 "This has resulted in an increase in the number of days needed by the pharmacy to fill repeat prescription and extra time being required to collect prescriptions due to the number of customers queuing." (Email 262)
- 6.1.241 "There are constant unrelenting queues at Shaunaks" (Email 263)
- 6.1.242 "This is not always possible as Shaunaks are so busy it's impossible to see the pharmacist. Shaunaks pharmacy is a very small building and queueing often extends to the outside of the building." (Email 264)
- 6.1.243 "I often struggle to find the time to collect prescriptions from shaunak's, the parking can be difficult and sometimes there are large queues." (Email 268)
- 6.1.244 "They clearly have no idea how long we have to wait in a queue at Shaunaks to get served, regularly at least 30 minutes to collect a prescription, this is if it is even ready...then you have to queue forever to collect it." (Email 269)
- 6.1.245 "Queues are the norm , especially when they take on the added pressure of Flu and covd jabs ." (Email 270)
- 6.1.246 "In addition, Shaunak's premises are tiny, and since the closure of Boots the queue often stretches out of the door." (Email 273)
- 6.1.247 "As pensioners we use and rely on Shaunaks Pharmacy, but very often we have to queue outside as the shop is full to capacity. We both have health problems and cannot bear to think about queueing in the winter when it may be bitter cold." (Email 274)
- 6.1.248 "I always allow 7-10 days for my prescription to be made up, then go down and queue for 15-30 minutes to be told it's not ready. I have a choice then of either waiting about 30 minutes for it to be made up or going home and queuing again another day. The queue always goes all round the shop and there are always several people waiting while their prescriptions are made up." (Email 275)
- 6.1.249 "Shaunaks...cannot cope with the growing population of Corsham. I have often experienced very long queues there." (Email 278)
- 6.1.250 *"After waiting in a queue of about 15-20 people I eventually was served, only to be told after about 10 minutes of searching that my prescription couldn't be found."* (Email 283)

- 6.1.251 *"They now have to ask for five days notice for a repeat prescription and the queues even for counter products are far too long and unacceptable."* (Email 286)
- 6.1.252 *"I find myself experiencing long queues (not untypically out of the door!) when using the only remaining pharmacy Shaunaks which is quite a walk from the town centre."* (Email 287)
- 6.1.253 *"Whenever I use Shaunaks there are always queues and sometimes you have to wait up to 15 minutes to be served."* (Email 288)
- 6.1.254 *"Since moving here in May I have struggled to collect my repeat prescriptions due to long queues at Shaunaks. Because I am at work during the day I don't have a long enough lunch break to allow for the queue"* (Email 291)
- 6.1.255 *"Since the closure of Boots, I have experienced long, very inconvenient queues at the remaining pharmacy in Corsham"* (Email 292)
- 6.1.256 *"On occasions, when I do go into the pharmacy, there are queues that sometimes stretch out of the pharmacy into the open air & into the rain if that what it is doing."* (Email 294)
- 6.1.257 *"Their level of service has diminished due to the increased demand and the footprint of Shaunaks does not lend itself to this; invariably with queues out the shop door, prescriptions are now either late in preparing or are lacking key components when made available."* (Email 297)
- 6.1.258 *"The only pharmacy that Corsham has currently is so busy and so small that my wife and I regularly have to queue outside in the rain."* (Email 300)
- 6.1.259 *"Queueing is normal, even in the rain outside because space is minimal."* (Email 301)
- 6.1.260 *"They are always run off their feet with people queuing out into the car park."* (Email 303)
- 6.1.261 *"Demand far outstrips supply with only Shaunaks operating , there are constant long queues, inadequate supply of drugs and other products in an out of the way location."* (Email 304)
- 6.1.262 *"Shaunaks is a hopeless pharmacy...There always seems to be a long queue there."* (Email 305)
- 6.1.263 *"It's not nice waiting in a big queue listening to the verbal abuse directed at the staff"* (Email 307)
- 6.1.264 *"Shaunaks is doing the best it can under the circumstances but there is often large queues and long waiting times and it is not conveniently situated for all Corsham residents."* (Email 309)
- 6.1.265 *"There are frequently long queues often outside in the rain and cold as winter approaches, then more often or not it is necessary to wait for a further ten minutes while prescriptions, which they have had for more than 72 hr are made up."* (Email 310)
- 6.1.266 *"Shaunaks...is often very busy, more so when vaccinations are being administered in the pharmacy and queuing for a prescription becomes a*

lengthy procedure in an overcrowded environment. Queues have often formed outside which is not an ideal situation even for the able bodied never mind the more infirm, especially in winter.” (Email 311)

6.1.267 *“However - there is ALWAYS a long queue and wait time for using their services - in bad weather we simply have to queue in the rain.” (Email 313)*

6.1.268 *“I have visited Shaunaks several times and it's been packed with people queuing outside.” (Email 314)*

6.1.269 *“The queue is usually out the door...and a lot of people inside the shop waiting for their prescriptions to be dispensed.” (Email 316)*

6.1.270 *“I have visited Shaunaks on a couple of occasions to find queues to enter the chemist and these have varied in size from a wait of twenty minutes to a little shorter time.” (Email 318)*

6.1.271 *“Shaunaks clearly can't cope with the sheer volume of work they are now expected to handle. This manifests itself in various ways which I describe below:*

6.1.271.11 I have had to wait over half an hour several times just to get a simple OTC product, which has on occasion been out of stock.

6.1.271.22 Prescription medicine, including HRT has been unavailable meaning a further visit and more queueing

6.1.271.33 I have had to queue for 20 minutes behind those waiting for medicines to get a vaccine” (Email 319)

6.1.272 *“Whilst the staff at Shaunaks work extremely hard I have regularly experienced long queues, often out of the door, waiting for medication or just otc products.” (Email 320)*

6.1.273 *“Shaunaks provides an admirable service but it is not the same as a town centre facility where people can access their medical and personal needs without having to walk a considerable distance and queue for medicines and other (limited) supplies.” (Email 322)*

6.1.274 *“The queues at Shaunaks sometimes extend out of the door and it is not unusual to wait outside in adverse weather.” (Email 323)*

6.1.275 *“it is not unusual to have massive queues and hence a lot of wasted time.” (Email 326)*

6.1.276 *“The impact on us is that there's long queues in Shaunucks [sic], which is a tiny pharmacy, and it's far less convenient than the previous site.” (Email 328)*

6.1.277 *“Now I am reliant on travelling to the pharmacy by car (not good for the environment) and having to queue for much longer at Shaunaks, which in some instances prevents me from getting the prescription as soon as I would like to.” (Email 333)*

6.1.278 *“the shop is extremely small, queues are long, parking is difficult as it's shared with the surgery, and even if you want to just buy something you have to wait in the queue.” (Email 334)*

- 6.1.279 *"Long queues outside the pharmacy" (Email 335)*
- 6.1.280 *"We all have repeat medications and Shaunaks are struggling, long queues and incomplete prescriptions." (Email 337)*
- 6.1.281 *"It is not unusual to have to queue for up to 30 minutes on a Saturday morning." (Email 339)*
- 6.1.282 *"Shaunaks is a tiny place, small, over crowded, not apparently able to cope at all and the queues for service and prescriptions is lamentable." (Email 341)*
- 6.1.283 *"When collecting prescriptions at Shaunaks, one only has to look at the queues and the number of staff working in the shop's small dispensing room to demonstrate the need for a second outlet." (Email 343)*
- 6.1.284 *"If you go to Shaunaks it is so busy ,there is always a queue, you cannot manage to get anything off the shelves without ploughing through people. If you need to pick up a prescription you always need to wait as it is never ready." (Email 346)*
- 6.1.285 *"queues out into the street is regular, often the prescription isn't there" (Email 347)*
- 6.1.286 *"There are always long queues at Shaunaks Pharmacy and whilst they offer the basic needs of fulfilling prescriptions and offering vaccinations, the shop itself is very limited, both on space and supplies." (Email 351)*
- 6.1.287 *"There are usually queues out of the door" (Email 352)*
- 6.1.288 *"The current pharmacy is overloaded with work and there is an obvious need for another in town as queues are common." (Email 354)*
- 6.1.289 *"Another issue is the incredibly long queues within the pharmacy itself while you wait to get served, which is compounded even further during the flu and covid vaccination periods. It is common for people to be queuing right out into the carpark, and a wait of 30 minutes plus it's not unusual." (Email 356)*
- 6.1.290 *"They are inundated and there are often long queues to either purchase goods or collect prescriptions." (Email 357)*
- 6.1.291 *"The only remaining pharmacy, Shaunak's, is a very small establishment and just cannot cope with the volume of patients queuing for both over the counter medicines and prescriptions. Sometimes the queues extend to outside the pharmacy and into the car park, even in inclement weather." (Email 358)*
- 6.1.292 *"This is not only due to the often ridiculously long queues that often go out of the door into the carpark," (Email 360)*
- 6.1.293 *"it is far too small to cope with the total local population and to see very aged and sick people having to queue outside especially in the rain and the oncoming winter conditions is appalling" (Email 361)*
- 6.1.294 *"Shaunaks, the remaining pharmacy, is constantly full of people queuing up to hand in prescriptions or to collect them, which is time-consuming, and the last thing I want to do because of the worry of catching flu or even a cold. Frequently the queue extends outside the door" (Email 362)*

- 6.1.295 *"On occasion I have had to make repeat visits, due to long queues, and sometimes items not being in stock." (Email 363)*
- 6.1.296 *"As Shaunaks [sic] is the only pharmacy available in Corsham there is always a queue." (Email 365)*
- 6.1.297 *"The queues at Shaunaks are ridiculously long, they can't cope with demand and I can no longer pop out at lunchtime from work to collect regular meds, as the queues at Shaunaks are too long...It ends up with already poorly and/or elderly people queueing in the rain"(Email 366)*
- 6.1.298 *"There are long queues frequently with consequent long waiting times and the already busy parking area for Shaunaks / Porch surgery has become even more congested." (Email 368)*
- 6.1.299 *"Every time I have gone to collect my prescription there is a queue of at least 5 or 6 people (and often more)" (Email 369)*
- 6.1.300 *"There is always a long queue of people waiting for their prescriptions to be filled, and customers wishing to buy other goods are also inconvenienced by the lack of space because of the queuing." (Email 370)*
- 6.1.301 *"Reasons : Shaunaks is too small store, & over stretched to the limit. Dealing with long queues [sic], lack of stock available, obvious stress by staff delays with perscriptions [sic] etc" (Email 372)*
- 6.1.302 *"accommodate the queues of people which extend into the car park at many times of the day." (Email 373)*
- 6.1.303 *"Our remaining pharmacy works flat out to service our town, but the queues are getting longer with people queuing outside in all weathers, and it has been necessary on occasion to have a "bouncer" on the door to keep things in order" (Email 375)*
- 6.1.304 *"And queueing sometimes out the door, even to pick up over the counter items terrible." (Email 376)*
- 6.1.305 *"On most occasions the queues have reached way outside the door, and waiting times have been long, despite a valiant attempt by the pharmacy staff to fulfil customer's prescriptions and requirements as quickly as they can." (Email 377)*
- 6.1.306 *"you have to join the queue of people waiting to collect a prescription to buy anything." (Email 378)*
- 6.1.307 *"I find that a visit to collect a prescription usually goes like this:*
- 6.1.307.11. *Arrive at the chemist and join a queue for the counter, frequently outside the shop (on a Saturday they employ a 'bouncer' to police the queue as they are only open in the morning)*
- 6.1.307.22. *Request repeat prescription, usually find that it is not ready, so join another queue of people waiting to collect their items." (Email 378)*
- 6.1.308 *"This queue could be inside but on busy days it snakes around the terrace outside which often confuses new arrivals who think it is for the pharmacy counter." (Email 379)*

- 6.1.309 *"Since the closure of Boots I have noticed the existence of regular long queues outside." (Email 380)*
- 6.1.310 *"There's very limited space to wait and you often have to queue outside which isn't great for elderly or vulnerable people in the cold/wet weather." (Email 382)*
- 6.1.311 *"there always seems to be a queue in there." (Email 383)*
- 6.1.312 *"We are desperate for another pharmacy in the village, without boots and sainsburys the queues in shaunaks [sic] are sometimes 45 minutes long. At times I have gone without crucial respiratory medicine as I cannot face the queue or the queue has been so long I do not have the time it takes to collect the medicine." (Email 384)*
- 6.1.313 *"Even before boots closed there was always quite a lengthy queue if you went in there, but now they are queuing out the door nearly constantly, (you can't pop up to collect a prescription when you are on a break from work as there's not enough time!) They even have a "bouncer" now to try and organise the chaos that is the queue of everyone in Corsham trying to use that one pharmacy to meet their needs! Waiting times for repeat prescriptions is no longer 48 hours, it is more like a week, when you do go to collect you have lengthy waiting times in the queue, but then also lengthy waiting times whilst they make said prescription up (they do not have the storage capacity to have everyone's prescription ready)" (Email 386)*
- 6.1.314 *"There are long queues for prescriptive medicines at Shaunaks pharmacy," (Email 388)*
- 6.1.315 *"Queues at Shaunaks are almost inevitable if they are supplying all Corsham's prescriptions now," (Email 390)*
- 6.1.316 *"Shaunaks, whilst providing an excellent service, are completely swamped and a visit there at any time of the day during opening hours will nearly always see a queue formed outside." (Email 393)*
- 6.1.317 *"There is always a queue and do it is very time consuming getting what you need." (Email 394)*
- 6.1.318 *"We are frustrated by the sheer numbers of people queueing, and often getting in and then finding orders are not made up ready, even when prescription has gone in well before the 3- 5 days they recommend." (Email 395)*
- 6.1.319 *"Increased waiting times and queues at Shaunaks Pharmacy: The increased pressure on Shaunaks has resulted in significantly longer waiting times for both prescriptions and over the counter medication. This delay has been particularly difficult when urgent medication is needed." (Email 397)*
- 6.1.320 *"Despite their efforts there are often queues stretching outside of the premises, Saturday mornings are to be avoided unless absolutely necessary due to lengthy queues caused by people whose only option is to collect their prescription on a Saturday due to working commitments." (Email 398)*
- 6.1.321 *"Very often the car park at Shaunaks is full and the queues to collect prescriptions are out of the door." (Email 399)*
- 6.1.322 *"I have never been there when you don't have to queue for ages to collect a script." (Email 402)*

- 6.1.323 *"The queues are often very long." (Email 403)*
- 6.1.324 *"I have been in the queue before now when frustration at waiting has meant patients have been loudly complaining at the wait while they are trying their best to provide a service." (Email 405)*
- 6.1.325 *"the shop is small and long queues frequent (especially on Saturday mornings when the opening hours are limited to 9-12 and the queue extends outside the building with a monitor to control it)." (Email 408)*
- 6.1.326 *"We have just one very small pharmacy which is quite frankly over-run on occasions causing unacceptable queues." (Email 411)*
- 6.1.327 *"Although the staff at the remaining pharmacy work extremely hard to meet the needs of the community they are often under stress and there are often queues of customers waiting up to half an hour to be served. It is a regular occurrence for queues to extend outside the premises." (Email 412)*
- 6.1.328 *"At times there is a queue out of the door of people waiting to be served and people inside waiting for their prescriptions to be made up. It is a small space and if I am going there to get something other than a prescription I can at times struggle to get to the shelves and have to wait the same unreasonable length of time." (Email 413)*
- 6.1.329 *"Whenever I've had to go to Shaunaks since Boots closed, there are always long waits and even queues outside." (Email 415)*
- 6.1.330 *"Long queue waiting times." (Email 418)*
- 6.1.331 *"Also, even before the pharmacy opens at 9am every day, there is a queue outside the pharmacy of people waiting to pick up prescriptions, and a separate [sic] queue for the covid/flu vaccinations." (Email 418)*
- 6.1.332 *"Queues to pick up prescriptions are always long despite Shaunaks efforts to cope with the huge demand." (Email 419)*
- 6.1.333 *"There is no shelter outside Shaunak's pharmacy when on the many occasions people have been queueing outside the premises, or indeed any seating for the less able. I dread calling at the pharmacy as so often the queues have been so long and time consuming - this will only get worse" (Email 423)*
- 6.1.334 *"But there are queues out the door." (Email 424)*
- 6.1.335 **Capacity issues faced by Shaunak's Pharmacy**
- 6.1.336 There are 5 pages of comments highlighting how the Shaunak's unit is too small, and how the Pharmacy lacks capacity. Some residents even highlight worries about spreading germs given how small and overcrowded the Shaunaks is. Residents highlight queuing outside in the rain as space is so limited. Residents also make the point that privacy is limited given there are so many people in a small space, and elderly residents having to stand whilst waiting.
- 6.1.337 *"Shaunaks is far to small." (Email 5)*
- 6.1.338 *"I am writing in support of a second Corsham pharmacy. Previously I got my prescription medicine from Boots, but since it closed, I have used Shaunaks."*

The queuing is often excessive and I have left the queue, because of the small space within the shop and the coughing and sneezing around me.” (Email 8)

6.1.339 *“This is absurd - Corsham is a swiftly growing quite large community now, and having the availability of only one small pharmacy (Shaunaks, attached to The Porch Surgery) is far from adequate to serve so many.” (Email 10)*

6.1.340 *“Shaunaks is small, not much storage space, the Staff are clearly run off their feet and there are usually long queues to be served ,sometimes stretching outside. Not good in inclement weather!” (Email 12)*

6.1.341 *“Corsham is a growing town and with a population of over 13,000, one very small Pharmacy is just not enough.” (Email 17)*

6.1.342 *“The limited size of the shop means that seating for those waiting is limited and this is compounded when flu vaccinations etc are being held. The back room preparation of prescriptions is also at bursting point and there is no scope for an extension of the premises.” (Email 19)*

6.1.343 *“Shaunuks [sic] is a small shop and they do their best but they are pushed.” (Email 22)*

6.1.344 *“It’s ridiculous to think that an area the size of Corsham and the surrounding villages is only serviced by one small pharmacy when other towns in the area have several.” (Email 28)*

6.1.345 *“The only pharmacy, Shaunaks. is far too small to cope on its own with the population of Corsham.” (Email 33)*

6.1.346 *“The current pharmacy is far too small to cope with the ever rising population of Corsham.” (Email 43)*

6.1.347 *“Shaunaks is a small pharmacy which benefits from being next to the surgery but unfortunately it cannot cope with the demand for prescriptions to be dispensed. There is nowhere to sit outside to wait when queuing.” (Email 47)*

6.1.348 *“It is ludicrous for an expanding town the size of Corsham to be served by only one, relatively small pharmacy.” (Email 56)*

6.1.349 *“One small pharmacy does not address the needs of a large local community, many of whom cannot easily reach Shaunaks, which is massively overburdened.” (Email 60)*

6.1.350 *“Plus it’s such a small shop I’m breathing in everyone’s germs” (Email 62)*

6.1.351 *“...a town the size of Corsham plus the parish of Box deserves and needs more than one small pharmacy attached to a Doctors surgery in Corsham and one other small pharmacy in Box which does not open on a Saturday.” (Email 68)*

6.1.352 *“The Shaunaks dispensary itself is far to small to deal with the amount of footfall it receives.” (Email 82)*

6.1.353 *“Corsham is only going to increase in size, with new housing, so it really requires another pharmacy now as the situation is only going to get worse. With the emphasis on community pharmacies, and pharmacies doing more to help ease the load of the NHS, I can’t currently see how Shaunaks would be able to take this on as there is simply no room to accommodate this. The*

current staff are having to work in a very small area, and the building is really not fit for purpose.” (Email 84)

- 6.1.354 *“Corsham definitely needs a second pharmacy - Shanauks does a brilliant job but they are swamped with customers and only have a small building.” (Email 89)*
- 6.1.355 *“Also, as Shaunaks shop is so small it has a very inadequate stock of over the counter medicines/pain relief and first aid necessities which I also need from time to time. I have also had to wait outside Shaunaks in the rain as their shop cannot accommodate many people.” (Email 97)*
- 6.1.356 *“Shaunak's is small, perhaps no more than 20 sqm, but it also has a display in the centre of the ‘waiting room’. Such a small, crowded space, waiting cheek by jowl with perhaps ten or a dozen other people, is somewhat unhealthy to say the least.” (Email 99)*
- 6.1.357 *“In the past year we have gone from having access to 3 pharmacies (Shaunaks, Lloyds at Sainsbury's and Boots) to just one, the smallest, Shaunaks.” (Email 107)*
- 6.1.358 *“Shaunaks are struggling to cope with a substantially greater trade. It is a small shop and there is almost always a long queue waiting to be served, frequently stretching out of the door.” (Email 111)*
- 6.1.359 *“Also its so small and no way of speaking to a pharmacist in confidence with so many people in there waiting to be served. In wet and cold weather it is not pleasant to have to wait outside. Also it is only a small place with very limited room for products too so not much choice.” (Email 112)*
- 6.1.360 *“Shaunaks is a small shop, and the volume of people entering is high - an easy breeding ground for flu/covid etc, as well as there often being a queue, which I struggle to stand in.” (Email 117)*
- 6.1.361 *“As a resident of Corsham I think there is a need for another pharmacy. There has been a terrific building expansion in the Corsham area which has increased the population enormously, that and the small size of the existing pharmacy inevitably means large queues forming while waiting to be served.” (Email 130)*
- 6.1.362 *“The actual chemist is too small to meet the demands put upon them and this reflects in the poor service customers receive. When you are queuing outside in the rain alongside the elderly, people who have visited the GP and are obviously poorly it is a ridiculous situation which could be avoided if an additional facility was available.” (Email 131)*
- 6.1.363 *“Shaunaks is very small and has a limited range of medically related items due to lack of space.” (Email 134)*
- 6.1.364 *“This unit comprises two normal but small (house size) rooms and a small consulting area. The rear room is fully used for storage and preparation by the pharmacist, while the “front” room is what passes as the shop/retail area, mainly taken up by shelving for retail, but limited, medical sales items. Customer waiting room is thus severely limited, and not infrequently customers must wait outside in whatever weather conditions occur. (this is particularly the case when the pharmacy is used for booked routine NHS inoculations etc.)” (Email 152)*

- 6.1.365 *"As grateful as we are to have Shaunaks Pharmacy in Corsham, the size of the shop and dispensary is too small for every day dispensing." "There is a small, cupboard size 'office' for consultations with a pharmacist, with customers queuing outside the door in close proximity, there is no privacy." (Email 163)*
- 6.1.366 *"I have been forced to queue in the rain outside Shaunaks as the shop is small." (Email 170) "Whilst Shaunaks are doing their best, they are only a small chemist and are struggling with the additional demand on them due to the closure of Boots, in addition they have limited space to stock a wide range of general chemist related products." (Email 174)*
- 6.1.367 *"We have a population of over 13 thousand people and battling to serve our community is one small pharmacy called 'Shaunaks'." (Email 177)*
- 6.1.368 *"Shaunaks is a very small shop." "Although there is a consultation room it is small and if you are queuing outside the door you can hear the 'confidential' consultation." (Email 187)*
- 6.1.369 *"The staff do their best they but the area is too small to cope with the number of customers." (Email 189)*
- 6.1.370 *"It is also notable that the staff of Shaunaks are under extreme pressure due to large numbers waiting to be served, I believe that the working area does not satisfy Health and Safety rules in regard to size of space per employee." (Email 197)*
- 6.1.371 *"As nearby resident using Corsham , Wiltshire amenities I am amazed at the lack of pharmacies for a busy sizable town. The Boots that closed down was always busy and accessible. The only other pharmacy is very small and very limited at products it can provide or advice it can give. Surely pharmacies are now more than ever needed to support overstretched GPs. Please support smaller communities for their vital medical needs." (Email 202)*
- 6.1.372 *"...the size of the pharmacy is not fit for purpose. There aren't enough chairs for elderly who are waiting as it's so small. There is no privacy because of the queues if you need to ask the pharmacist about something or go in the tiny "private" room where everyone stood outside in the queue can hear everything." (Email 206)"*
- 6.1.373 *"Shaunaks premises are small and cramped, and do not display the range of products formerly stocked by Boots, which was in a much larger space." (Email 225)*
- 6.1.374 *"The area in front of the pharmacist counter is small and often congested." (Email 253)*
- 6.1.375 *"The shop is small and some customers are waiting outside for long periods. Whilst that may be acceptable in warm periods the older members of our community will suffer in the winter months." (Email 258)*
- 6.1.376 *"The pharmacy resource in Corsham is abysmal. The premises size and the growth in the local population are severely hampering their ability to deliver a service." (Email 259)*
- 6.1.377 *"This is not a snub at Shaunaks and their staff, but how can they provide the service they used to, when suddenly they have double the patients and*

customers. There is only so much they can do in their small premises, not matter how many staff they employ.” (Email 283)

6.1.378 “There are always too many people in a very small waiting area. In there feel surrounded by possible viruses and other nasty diseases [sic] I can catch whilst waiting for my turn.” (Email 295)

6.1.379 “The only pharmacy that Corsham has currently is so busy and so small that my wife and I regularly have to queue outside in the rain.” (Email 300)

6.1.380 “The staff have a very small area in which to work and the dispensed medicines are heaped up on the floor with shelving overflowing.” “It’s a small space with insufficient seating and gets very crowded. The dispensing room at the back is tiny with staff looking incredibly busy in crowded conditions.” (Email 313)

6.1.381 “It(Shaunaks) is just too small to cope with the demands of the amount of people that live in Corsham.” (Email 315)

6.1.382 “I think it is absolutely ridiculous that there is only one small pharmacy in Corsham, given how much the town has increased in size with new housing developments.” (Email 316)

6.1.383 “With all the new houses in the area one small pharmacy is not fit for purpose.” (Email 332)

6.1.384 “Shaunaks pharmacy is small and is obviously having to cope with all prescriptions for Corsham patients.” (Email 334)

6.1.385 “As a small shop there is obviously a problem stocking a wide range of items.” (Email 334)

6.1.386 Shaunaks is also very small and I fear I will catch vivid[Covid] as you are in close proximity to people often showing signs of ill health. (Email 336)

6.1.387 “Shaunaks is a tiny place, small, over crowded, not apparently able to cope at all and the queues for service and prescriptions is lamentable.” (Email 341)

6.1.388 “The current single, small pharmacy is just not enough to support the size of the community requiring its services.” (Email 351)

6.1.389 “Shaunaks is small and unable to cope with demand as it is.” (Email 365)

6.1.390 “it(Shaunaks) is only a small premises and simply cannot cope and is overwhelmed by the number of NHS prescriptions it has to provide and does not have the capacity for very much in the way of over-the-counter medicines (coughs and cold medicines and basic first aid items).” (Email 369)

6.1.391 “Shaunaks is a very small pharmacy and over stretched. Given the ever increasing population in and around Corsham, it is absolutely unable to cope. It also holds a very limited supply and choice of non over the counter products.” (Email 377)

6.1.392 “The closure of the Boots pharmacy in the main shopping area of Corsham has left a big gap in local retailing. There are two others nearby, Shaunak’s and Box Pharmacy. We used the second but have now changed to the first. Both have rather small premises and both give services that could be improved.” (Email 427)

- 6.1.393 *"I do not know whether there are sufficient trained pharmacists to cover the county. That said Corsham continues to expand and we are in increasing need of additional services to support an ever growing (and aging) population, not less."* (Email 380)
- 6.1.394 *"Corsham is a growing developing town that needs more resources to accommodate it."* (Email 385)
- 6.1.395 *"I am writing to express my strong support for the opening of a new pharmacy in Corsham. The recent closure of Boots Pharmacy has significantly impacted our community, and there is a pressing need for additional pharmacy services to accommodate the growing population and the unique needs of families like mine."* (Email 400)
- 6.1.396 *"More generally, it seems to me bizarre that there is argument about whether a town with the area population the size of Corsham (and still growing through house building) should have (another) pharmacy/chemist in the town centre."* (Email 413)
- 6.1.397 *"They are doing their best but Corsham is an ever growing town. And, I feel shaunaks are at breaking point."* (Email 418)
- 6.1.398 Difficulty in accessing pharmacies by Bus**
- 6.1.399 A number of residents wrote in regarding the bus services, and in particular the 231 bus service which serves the town centre but does not go to Shaunaks Pharmacy. These emails mention how elderly residents are forced to take the taxi to Shaunaks Pharmacy as it is not on the 231 bus route. Some residents even reference the infrequency of the X31 bus service to Shaunaks from the Proposed site. Others talk about having to wait in the rain for a bus.
- 6.1.400 *"Many people who rely on public transport cannot access the existing pharmacy easily, whereas a number of buses stop in the centre of town."* (Email 389)
- 6.1.401 *"I find it a much longer walk from my home in the traditional town centre to get to Shaunaks on Beechfield Road. As I get older this is more important. Although I could use a bus to help with this the service is not frequent and I'd have to wait for the return journey."* (Email 413)
- 6.1.402 *"I am writing in respect of another pharmacy opening in Corsham. I feel there is a real need for another one in the centre as there are many elderly people living in this town who find it hard to get to Shaunaks. If they have no transport, they have to walk or get a taxi as there is no bus service."* (Email 55)
- 6.1.403 *"Although there are other pharmacies in Chippenham and Box, at a time when one doesn't feel well or in pain, they would require a walk to the bus stop, a wait in the rain and then the same for the return trip"* (Email 57)
- 6.1.404 *"Many people with no car and walking disabilities would get a bus to go to Boots, but to walk from the shops to Shaunaks is impossible."* (Email 66)
- 6.1.405 *"We really do need another pharmacy in the town that is accessible to everyone either walking, driving or travelling by bus and the empty Boots building is already equipped to be used in this way."* (Email 76)

- 6.1.406 *"I have seen many elderly people having to get taxis or help to get to Shaunaks when they used to be able to get the bus to the shops and in a much more sociable and convenient way get their prescriptions. This is causing them a real challenge."* (Email 94)
- 6.1.407 *"...another pharmacy would be very useful especially if you are an older person who needs a bus to get into the town centre as no bus passes the existing pharmacy."* (Email 130)
- 6.1.408 *"It is desperately needed by disabled residents who struggle to get to Shaunaks which is not served by a bus stop or easy to navigate pavements."* (Email 171)
- 6.1.409 *"The lack of accessibility to Pharmacies in our area. Parking at Shauna's and Box village is extremely limited and both are not easy to walk or catch a bus to. Box is closed at weekends."* (Email 188)
- 6.1.410 *"I feel so sorry for elderly people (and there a quite a lot in Corsham) who don't drive and have to get the bus from one end of town to centre and then have a long walk to the Porch surgery."* (Email 264)
- 6.1.411 *"The absence of a pharmacy in the town centre means that those who arrive by bus to the town who require pharmacy have to walk up to the pharmacy near the community centre and back to town."* (Email 308)
- 6.1.412 *"Shaunaks has been acting at or over capacity for some time and is inaccessible for some people as it is relatively far from a bus stop and out of the town centre."* (Email 387)
- 6.1.413 *"Many people who rely on public transport cannot access the existing pharmacy easily, whereas a number of buses stop in the centre of town on Newlands Road."* (Email 389)
- 6.1.414 *"I find it a much longer walk from my home in the traditional town centre to get to Shaunaks on Beechfield Road. As I get older this is more important. Although I could use a bus to help with this the service is not frequent and I'd have to wait for the return journey."* (Email 413)
- 6.1.415 *"I can catch a bus from near my home to Corsham centre, but not to Shaunak's pharmacy, so being by myself with no transport I have relied on others to help me."* (Email 423)
- 6.1.416 Difficulty in accessing pharmacies by foot**
- 6.1.417 A number of residents talk about the difficulty in walking to Shaunaks from the town-centre. Alongside the bus comments, It appears that residents are accustomed to using the 231 bus to access the town centre but then struggling with the additional round-journey to the Shaunak's, which is outside the town centre.
- 6.1.418 *"My husband and I retired to Corsham more than twenty years ago and were delighted to find a Boots chemist in Martin gate close to where we live. It was used almost on a daily basis for medication, first aid needs, prescriptions, toiletries, cosmetics and processing of photographs. Now widowed and at the age of [redacted by NHS Resolution] years, I have quite a walk to reach Shaunaks for all of the above."* (Email 12)

- 6.1.419 *"The lack of accessibility to Pharmacies in our area. Parking at Shauna's and Box village is extremely limited and both are not easy to walk or catch a bus to." (Email 188)*
- 6.1.420 *"It's quite a walk from the town centre to the only existing pharmacy 10-15 minutes and far to [sic] much of a distance for those unsteady on their feet." (Email 398)*
- 6.1.421 *"Corsham is a growing town including Katherine Park and one pharmacy, is absolutely insufficient for the size of the population as well as it being at least a 10 minute walk from the centre, and that is for those who can walk at a pace." (Email 18)*
- 6.1.422 *"I am disabled and cannot walk far or stand long. when we had boots in high street it was perfect now only shawnuk [sic] way to far." (Email 35)*
- 6.1.423 *"A long walk if you live in Corsham and have no transport." (Email 72)*
- 6.1.424 *"We find it a long walk to Shaunaks in Beechfield Road." (Email 75)*
- 6.1.425 *"This one little chemist is also a fair walk away from the town centre which makes it awkward for some less able-bodied people. I earnestly implore ICB to actually check out our large and ever-growing town and give us a much needed chemist to replace the one we lost." (Email 108)*
- 6.1.426 *"I know of several elderly people who live in accommodation close to the town centre, who struggle to walk the distance from their homes to Shaunaks..." (Email 109)*
- 6.1.427 *"...it's quite a walk to Schaunaks [sic]." (Email 122)*
- 6.1.428 *"The current and only pharmacy is a way out of town - too far for me to walk." (Email 138)*
- 6.1.429 *"As you will be aware the only alternative chemist (other than travel several miles to Chippenham) is a very small unit located close to our doctors surgery, This is some distance away, and not accessible by pubic [sic] transport, thus a very long walk for the elderly." (Email 152)*
- 6.1.430 *"... although it is convenient for the surgery it is a long walk from the centre of the town." (Email 162)*
- 6.1.431 *"Since the closure some struggle to walk to Shaunaks which is the only pharmacy in Corsham and the cost of a taxi is not affordable, this is causing some distress and anxiety." (Email 235)*
- 6.1.432 *"On another note - we need a pharmacy in our high street - not a good 10 min walk away (that's 10 mins for a fit person - not an elderly one)" (Email 210)*
- 6.1.433 *"...Shaunaks which is quite a walk from the town centre." (Email 287)*
- 6.1.434 *"... those with mobility issues pavements are narrow and vehicles mount the pavements in order to pass large vehicles which also use Pickwick Road making walkers vulnerable." (Email 308)*
- 6.1.435 *"...Shaunaks is quite a walk from the main shopping area, especially for those with restricted mobility." (Email 377)*

- 6.1.436 *"Although Shaunaks is closer than Box, it is not a walkable distance, particularly when managing a young child."* (Email 400)
- 6.1.437 *"Now it has to be a separate journey to Shanuks and as you get older it can be a long walk if you don't drive."* (Email 402)
- 6.1.438 *"To get to Shaunaks takes twice as long to walk for me (as to the town centre) and involves a walking through narrow, poorly lit alleyways in which I feel unsafe as the afternoons get darker."* (Email 411)
- 6.1.439 Difficulty in accessing pharmacies by car (parking)**
- 6.1.440 A number of residents highlight the difficulty in finding parking spaces at Box Pharmacy and Shaunaks. Blue Badge Holders express particular concerns in not being able to find an accessible parking.
- 6.1.441 *"The lack of accessibility to Pharmacies in our area. Parking at Shauna's and Box village is extremely limited..."* (Email 188)
- 6.1.442 *"Shaunaks parking spaces nearly always full. Difficult to get in and out of car if you have mobility issues eg walking stick as they have small designated bays outside the pharmacy."* (Email 47)
- 6.1.443 *"At busy times parking space is congested, which adds to the time spent on a visit to the pharmacy, as you either have to wait for a space to come free or hunt around for one further away and then walk the rest of the way."* (Email 150)
- 6.1.444 *"Even driving past the joint car park on most days would show significant overcrowding."* (Email 13)
- 6.1.445 *"Parking is a problem with traffic backing out to the public road on many occasions."* (Email 43)
- 6.1.446 *"...the small car park that serves both the surgery and the pharmacy is always crammed."* (Email 49)
- 6.1.447 *"The parking at the surgery can be difficult at times."* (Email 100)
- 6.1.448 *"There are only two disabled parking bays in the car park, very frequently occupied by cars not displaying a blue badge. When I complain to the receptionists, they say they have no resources to monitor parking."* (Email 111)
- 6.1.449 *"...they(Shaunacks) are now clearly overwhelmed with the amount of customers they have and the limited space and parking."* (Email 113)
- 6.1.450 *"I'm a blue badge holder with mobility problems and have struggled since Boots closed, as the car park outside Shaunaks is small, and serves a busy GPs' surgery too. It's usually congested, as well as fully parked up."* (Email 117)
- 6.1.451 *"The parking outside Shaunaks is primarily for the doctor's surgery so the extra demand deprives patients of a place to park. I am in the town centre nearly every day so picking up pharmacy items would be much more convenient than having to drive to Shaunaks. I imagine this is doubly difficult for the elderly or those without transport."* (Email 166)

- 6.1.452 *"Since the closure of Boots there is only one chemist outlet (Shaunaks) serving the whole town which is further for us to travel to and has only limited parking arrangements which are also shared by the Porch Surgery and are full most of the time." (Email 174)*
- 6.1.453 *"Lack of parking spaces, particularly for those with disabilities..." (Email 195)*
- 6.1.454 *"Shaunaks, is some distance from the town centre and has difficult and limited parking space." (Email 225)*
- 6.1.455 *"Shaunaks Pharmacy is not exactly 'in Corsham Town Centre'. It is difficult to get to without a car - but even then the car parking is limited." "As with Shaunaks the Pharmacy at Box is very very very busy. The Box Pharmacy is also small and on the busy A4 with no nearby parking spaces." (Email 233)*
- 6.1.456 *"Parking is also an issue and as a blue badge holder, there is never a space available." (Email 242)*
- 6.1.457 *"...the parking situation is another concern, not least the number of drivers (often elderly) seeking to turn around in the car park immediately outside Shaunaks, to my eyes that looks like another 'accident waiting to happen'." (Email 253)*
- 6.1.458 *"Similarly, it's now virtually impossible to find a car space in the carpark, impacting patients going to the doctors as they share the carpark. The extra traffic using this area spills out into the surrounding roads and takes any available parking spaces in the library carpark which in turn affects visitors using the library, pool and leisure centre." (Email 313)*
- 6.1.459 *"...parking is difficult as it's shared with the surgery." (Email 334)*
- 6.1.460 *"There is a very small pharmacy in Box village with no parking and extremely limited space." (Email 351)*
- 6.1.461 *"We really do need a pharmacy in the centre of town. It's where all the public transport from the outskirts and the villages arrives. It's got lots of parking." (Email 353)*
- 6.1.462 *Another problem is the limited parking at Shaunaks which also has to provide enough spaces for the surgery." (Email 368)*
- 6.1.463 *"Car parking outside the doctors and pharmacy is now a serious problem at times. People who have finished in the pharmacy return to their cars to find others are hanging around waiting for a space and are stopping them leaving. Those hanging about try to move to let out the leaving driver and find that they cannot do so as other cars are waiting in the entrance from the road. So everyone gets gridlocked." (Email 379)*
- 6.1.464 *"The car parking situation at the existing pharmacy is not adequate." (Email 389)*
- 6.1.465 *"... the closest alternative pharmacy(box), which is far, has limited parking..." (Email 400)*
- 6.1.466 *"A visit to Shaunaks is an extra journey from town, often with a parking problem." (Email 408)*

6.1.467 Difficulty in accessing a pharmacy as part of residents daily lives

6.1.468 A number of residents highlight how they have to make a special trip to access the Shaunak's Pharmacy. A pharmacy at the proposed site would allow people to access pharmaceutical provision as part of their daily lives, especially the Co-Operative supermarket.

6.1.469 *"Shaunaks is not central... it is not easy to get to and cannot be combined with the weekly shop."* (Email 187)

6.1.470 *"Myself & my wife are an elderly couple ([redacted by NHS Resolution] years +) who live close to the town centre, we are frequent users of the town's facilities & shops and always walk to and from them. Being in the town's precinct the location of the old Boots was very convenient as we could collect our medication and other products whilst doing our daily shopping and without using the car. Since the closure of Boots there is only one chemist outlet (Shaunaks) serving the whole town which is further for us to travel to and has only limited parking arrangements which are also shared by the Porch Surgery and are full most of the time."* (Email 174)

6.1.471 *"Shaunaks is not in the town centre so would require additional walking and crossing two busy main roads - far from ideal for the elderly or young families who typically rely on the bus services."* (Email 203)

6.1.472 *"I personally have been affected by the closure of Boots. Shaunaks, our other pharmacy, are unable to get the medication prescribed for me by my GP. This means, instead of a 5 minute walk to Corsham High Street, I have to travel into Chippenham, pay to park my car and then walk to the pharmacy there - the whole trip taking over 1hr. If I were to go by bus it would take 2 1/2 hours or more."* (Email 97)

6.1.473 *"The current and only pharmacy is a way out of town - too far for me to walk. It's difficult when I am trying to do my other business in the centre. It is too difficult to have two separate trips."* (Email 138)

6.1.474 *"Shaunaks involves a big detour as its nowhere near the other shops - this must cause a lot of inconvenience for the less mobile."* (Email 246)

6.1.475 *"...more often than not, a special journey has to be made instead of the convenience of having a town centre where it can be combined with shopping."* (Email 310)

6.1.476 *"The centre of Corsham has a good range of shops and is very well used by locals and visitors. That's where we need a pharmacy."* (Email 353)

6.1.477 *"I was extremely dismayed when Boots the Chemists closed in Corsham Town centre this year as, being in my late seventies now, having a full spread of essential services central to the town was one of my prime reasons for moving here."* (Email 10)

6.1.478 *"I was surprised that Boots (Martingate) closed in the first place, as it is central to Corsham and I had experience of collecting prescriptions from there for an elderly and with restricted mobility, elderly neighbour. It was convenient, and provided the opportunity to buy toiletries and items not available in the Co-op."* (Email 34)

- 6.1.479 *"I just wanted to add my name to your hopefully growing number of local residents addressing the dire need for a centrally located pharmacy for the town. One small pharmacy does not address the needs of a large local community, many of whom cannot easily reach Shaunaks, which is massively overburdened."* (Email 60)
- 6.1.480 *"Corsham needs to have another Pharmacy in a central position with sufficient space for consultations."* (Email 75)
- 6.1.481 *"A central pharmacy (as was Boots) meant that a pharmacy visit could be combined with a general shopping trip (to the Co-op, Toby Haines butchers, Corsham Bookshop etc)"* (Email 99)
- 6.1.482 *"The pharmacy at Boots offered a centrally located service with pedestrian access, public transport links and parking facility which is vital for Corsham and the surrounding villages and rural inhabitants..."* (Email 110)
- 6.1.483 *"A centrally located pharmacy with pedestrian access, public transport links and parking facilities, is vital for a small town of this size, and its surrounding villages and rural inhabitants."* (Email 121)
- 6.1.484 *"We definitely do need a central chemist as well for a town the size of Corsham and with an older population and lots of young families."* (Email 122)
- 6.1.485 *"I wish to add our names to the appeal for a new pharmacy in Corsham to replace that closed by Boots earlier this year. That outlet was situated in the central pedestrian shopping centre of this town, close to our bus stops, and as such was of easy access to all, especially the aged (we are both in our late [redacted by NHS Resolution],) and particularly to those with mobility problems (such as my wife). Boots did of course sell the usual wide range of non pharmacological goods, many now not available here..."* (Email 152)
- 6.1.486 *"We need another Chemist in central Corsham asap."* (Email 171)
- 6.1.487 *"I find it quite amazing that the ICB should find that there is 'not enough evidential need' for another pharmacy in Corsham, especially one more central when the GP surgery and its small neighbouring pharmacy, Shaunaks, are under such pressure."* (Email 176)
- 6.1.488 *"They close for an hour over lunch so it doesn't always coincide with my visit to the central shopping area."* (Email 209)
- 6.1.489 *"For many in Corsham, especially elderly individuals, those with limited mobility, and families without easy access to transportation, the absence of a central pharmacy is keenly felt."* (Email 230)
- 6.1.490 *"The closure of the Boots chemist/pharmacy was a real loss to Corsham and we are sure that a new pharmacy in the same location would be used by a great many people. It seems obvious that to older members of the community and those with young children the central location, close to other shops on the high street and in the precinct not to mention the car park and local bus stop make it an ideal place for such an important service."* (Email 261)
- 6.1.491 *"I would be in support of a new pharmacy in Corsham town centre. It is a more central location and has higher footfall making it more accessible and easier for people to collect their prescriptions."* (Email 268)

6.1.492 *"Please can we have another pharmacy in the centre of Corsham. From my point of view there are three main reasons:*

6.1.492.1 *1. Easy access from the disabled parking in the centre of Corsham meaning I only have to climb out of my car once to combine my general shopping with going to the pharmacy. Whereas if I were to try and go to Shaunak's I would have to find somewhere to park and get out and into my car again.*

6.1.492.22. *Apart from collecting my regular prescriptions I could also speak to a pharmacist if I needed advice.*

6.1.492.33. *Also there are frequently non-prescription items I need to purchase such as dressings for wounds, pads etc." (Email 284)*

6.1.493 *"As Shaunaks is 1/2 mile outside town this means there is now no town centre pharmacy in Corsham, an essential to some residents of the town. I fully endorse the opening of a pharmacy in Corsham town centre as this will provide a central alternate location by which the community can collect prescriptions and other over the counter healthcare products." (Email 297)*

6.1.494 *"As a long term resident of Corsham I can assure the ICB that there is a compelling need of a pharmacy in central Corsham. Before Boots closed the system was struggling to cope adequately, now it has broken down." (Email 304)*

6.1.495 *"I am a working parent with two children and already have a lot to juggle. When Corsham had a centrally located pharmacy I was able to pick up prescriptions quickly in my lunch break." (Email 333)*

6.1.496 *"Then there is the access to Shaunaks ,it is not possible to get there without a car , or walking but not everyone is able to do this. If, on the other hand, there was a new pharmacy allowed in Martingate, the central area, it would be much easier for people to access and they would be able to do other shopping at the same time, not possible with Shaunaks, it is out on a limb." (Email 346)*

6.1.497 *"There are many elderly people who live centrally to Corsham who are unable to access the existing pharmacy due to it being a distance from the town centre. Many people who rely on public transport cannot access the existing pharmacy easily, whereas a number of buses stop in the centre of town on Newlands Road The is a large community of families who attend local schools in the centre of Corsham who would benefit from being able to visit the town centre pharmacy whilst in town collecting children (Corsham Primary, Heywood, St Patrick's, Corsham Secondary)" (Email 389)*

6.1.498 *"If there is an organisation ready to invest in another pharmacy in a more central location, why not allow it? I can understand Shaunaks not being in favour, but otherwise, seems like everyone wins!" (Email 391)*

6.1.499 *"...there are a great many elderly shoppers in the centre of Corsham who I can see have various ailments and requirements that would make (and hitherto did make) a centrally located pharmacy and prescription dispensing service absolutely essential. (Email 426)*

6.1.500 Difficulty accessing pharmacies at lunch time

6.1.501 A number of residents also expressed difficulty accessing pharmaceutical provision at lunch time. My client has proposed lunch-time core opening from Monday to Friday.

6.1.502 *"The queues in Shaunaks, coupled with the fact that it closes for lunch makes it extremely difficult to get medicine or pharmaceutical products when I need them."* (Email 77)

6.1.503 *"They are closed over the lunch time period, when we are on a lunch break and so when there is a second pharmacy it is often open at a staggered time, so you can go to the open one in your lunch break. This seems crazy as a lunch hour would be when many people can actually get to a pharmacy."* (Email 94)

6.1.504 *"Their opening times are limited as they close each day for lunch."* (Email 163)

6.1.505 *"They close for an hour over lunch so it doesn't always coincide with my visit to the central shopping area."* (Email 209)

6.1.506 *"The proposed applicant would use existing recently vacated pharmacy premises and provide longer opening hours (especially lunchtime opening). Whilst weekend opening would have been preferred as well I believe this additional capacity should nevertheless be welcomed and supported."* (Email 223)

6.1.507 *They close for an hour over lunch so it doesn't always coincide with my visit to the central shopping area.* (Email 209)

6.1.508 *"Shaunaks closes early on Saturday, doesn't open at all on Sunday and is also closed during the lunch hour further limiting the times people can attend."* (Email 356)

6.1.509 *"I work and sometimes can only pick up prescriptions at lunchtime which is tricky as they are closed at lunchtime!"* (Email 403)

6.1.510 *"live and work on the High Street in Corsham and have found it difficult to access Shaunaks. They close at lunchtime when I (and my staff) can go to pick up prescriptions."* (Email 405)

6.1.511 Deteriorated service levels at the Shaunaks Pharmacy

6.1.512 A number of residents also write about the poor service levels now received in the Shaunaks Pharmacy. A common theme is that the Shaunaks Pharmacy is 'overwhelmed'. A number of comments also highlight how residents are scared to ask the Pharmacist for advice given how busy they are/ close proximity to other patients causes embarrassment. It is little wonder that Pharmacy First is not being delivered properly. One commenter even says: *"I would not dream of queuing up at Shaunak's for health care advice"*.

6.1.513 *"Even though I always leave over a week from requesting a prescription to collecting it, it is often not ready. This was never the case with Boots. Shaunaks seems over run with the new demand for its services."* (Email 8)

6.1.514 *"This is absurd - Corsham is a swiftly growing quite large community now, and having the availability of only one small pharmacy (Shaunaks, attached to The Porch Surgery) is far from adequate to serve so many. Often it is overwhelmed, has long waiting times to be served and on many occasions, (even in the past*

when Boots was still in operation), has queues formed outside the door.” (Email 10)

6.1.515 *“Shaunaks is small, not much storage space, the Staff are clearly run off their feet and there are usually long queues to be served ,sometimes stretching outside.” (Email 12)*

6.1.516 *“I have known Shaunaks very well over ten years and it has always been busy, even before the closure of Boots, at which time it was immediately swamped by some dozen applicants waiting for service at any one time, all the time during opening hours.” (Email 13)*

6.1.517 *“We are desperate for another pharmacy in Corsham, I am a [redacted by NHS Resolution] person who relies on regular prescriptions, and find the only pharmacy in Corsham are under tremendous pressure to provide a reliable and safe service for their customers.” (Email 14)*

6.1.518 *“Their level of service has diminished due to the increased demand and the footprint of Shaunaks does not lend itself to this; invariably with queues out the shop door. Moreover, prescriptions are now either late in preparing or are lacking key components when made available.” (Email 15)*

6.1.519 *“However, the closure of Boots has had a serious impact on Shaunaks’ ability to deliver a prompt and efficient service... I most definitely receive a worse service than before and for someone approaching their late [redacted by NHS Resolution] this is not a good thing.” (Email 19)*

6.1.520 *“It’s ridiculous to think that an area the size of Corsham and the surrounding villages is only serviced by one small pharmacy when other towns in the area have several. I think this needs to be revisited to make things easier for both Shaunaks’ staff and all the patients who need their medication.” (Email 28)*

6.1.521 *“Please reopen this essential service in the town centre.” (Email 31)*

6.1.522 *“Since the closure of the above Boots branch it has been very difficult for the only remaining chemists in Corsham, to offer an efficient service to the 40,000+ people live here.” (Email 40)*

6.1.523 *“Shaunacks [sic] are struggling to keep up with all the work the are now carrying and there is often a long line of customers outside the door waiting for service.” (Email 41)*

6.1.524 *“The staff at Shaunaks do a valiant job of providing a service to the public but they are frequently overwhelmed by the sheer numbers of customers.” (Email 43)*

6.1.525 *“Unfortunately, Shaunaks is struggling to meet the increased demand, which is impacting service for residents and causing significant inconvenience.” (Email 55)*

6.1.526 *“The impact of this on both customers and the pharmacy team has been considerable, with staff often overwhelmed and unable to maintain the prompt service they strive to provide.” (Email 55)*

6.1.527 *“It is ludicrous for an expanding town the size of Corsham to be served by only one, relatively small pharmacy...Since the demise of Boots, Shaunaks have*

made a sterling effort to provide an adequate service - but it is readily apparent that they are often stretched to the limit and beyond.” (Email 56)

6.1.528 *“There are always cues waiting to be served at Shaunaks.” (Email 63)*

6.1.529 *“Please look for a replacement pharmacy offering a similar range of drugs and services and help the whole town.” (Email 70)*

6.1.530 *“One pharmacist to serve over 22,000 people for their regular medications, urgent prescriptions, minor medical complaints, minor injuries, medical and medication questions. Apart from unacceptable, this is ridiculous!” (Email 73)*

6.1.531 *“The situation was completely unsatisfactory prior to the closure of Boots (in terms of the service provided and queuing times) and a Pharmacy that despite its very best efforts was unable to provide an acceptable service by any measure.” (Email 79)*

6.1.532 *“One is forced to the conclusion that the ICB and its membership are not concerned about issues such as Quality of Service, customer satisfaction, an aging population etc?” (Email 79)*

6.1.533 *“However, since Boots Pharmacy has closed, the service has gone downhill alarmingly. On my husband’s last trip to Shaunaks, there were 11 customers in front of him, some of whom were having to wait outside as there was not enough room to wait inside.” (Email 84)*

6.1.534 *“Furthermore, for elderly people like me, it is extremely daunting be forced to wait around for periods to be served.” (Email 96)*

6.1.535 *“it is extremely busy and difficult to get to at our age, and although the staff are diligent and very customer friendly it is becoming more and more hard for them to serve everyone in a timely manner.” (Email 98)*

6.1.536 *“I am a [Redacted by NHS Resolution] from the Porch Surgery and as such I’m well aware of how valuable pharmacy services are. Whilst Shaunaks are undoubtedly doing as well as they can, they simply don’t have enough space to service the needs of Corsham and the surrounding areas.” (Email 102)*

6.1.537 *“Many people, especially the elderly will come to Corsham town centre to do their routine shopping. Some will struggle to then get to Shaunaks if they are in need of pharmacy services.” (Email 102)*

6.1.538 *“I have needed two prescriptions since Boots closed. On both occasions, I filled in applications online, was given a date when it would be available at Shaunaks and made the special journey to collect the items two days after the date. On both occasions, the prescriptions were not ready.” (Email 104)*

6.1.539 *“It is a small shop and there is almost always a long queue waiting to be served, frequently stretching out of the door. There are a few seats for those waiting for prescriptions (I can never understand why), so those of us who cannot stand for long suffer - my wife and I (we are both in our [Redacted by NHS Resolution]) have great difficulty in collecting our regular medication.” (Email 111)*

6.1.540 *“Also its so small and no way of speaking to a pharmacist in confidence with so many people in there waiting to be served. In wet and cold weather it is not pleasant to have to wait outside.” (Email 112)*

- 6.1.541 *"I personally struggle to get my prescriptions as I work full time and when I get to Shaunaks, the queues are very long and everyone is moaning about how long it takes to get served."* (Email 113)
- 6.1.542 *"I require [Redacted by NHS Resolution] weekly repeat Prescriptions for up to [Redacted by NHS Resolution] medications and am well aware of how Shaunaks struggle to meet the local demand for Pharmacy services."* (Email 114)
- 6.1.543 *"Bearing in mind that, particularly an aging population, don't only require a prescription service but also benefit from access to over the counter medication and advice from the staff. The government have been advocating an increased role for chemists in such circumstances as these. The availability of such services to the wider community should also not be overlooked."* (Email 118)
- 6.1.544 *"Not only do I have personal friends and acquaintances who have expressed their concern that Shaunaks is unable to cope with demand for pharmacy services but I volunteer in a [Redacted by NHS Resolution] where elderly and vulnerable people are very worried about how our local area will manage going forwards with just one pharmacy in the Corsham area."* (Email 121)
- 6.1.545 *"Shaunaks is just not able to service the ever increasing population of Corsham."* (Email 124)
- 6.1.546 *"Built since the Seventies, it surely cannot be considered reasonable for a town to double its population yet have a key service cut by 50%."* (Email 126)
- 6.1.547 *"There has been a terrific building expansion in the Corsham area which has increased the population enormously, that and the small size of the existing pharmacy inevitably means large queues forming while waiting to be served."* (Email 130)
- 6.1.548 *"The actual chemist is too small to meet the demands put upon them and this reflects in the poor service customers receive. When you are queuing outside in the rain alongside the elderly, people who have visited the GP and are obviously poorly it is a ridiculous situation which could be avoided if an additional facility was available."* (Email 131)
- 6.1.549 *"Once into the actual Chemist, the service provided by the non motivated staff is only just acceptable, and I appreciate they are busy however they are there and being paid to offer a service to the public."* (Email 131)
- 6.1.550 *"Currently the only local pharmacy (Shunaks) cannot cope with the overwhelming demand for services so queues are extensive and it's locality is not easily accessible for those with reduced mobility."* (Email 133)
- 6.1.551 *"My in law was in urgent need of an inhaler for his which was not available, he could have died! This will only get worse with more new housing already being built around the town and a clearly elderly population which is only going to need more service."* (Email 136)
- 6.1.552 *"the Shaunaks staff are drowning under the weight of the population they are expected to serve, and it is hardly surprising that the service is sub-standard."* (Email 137)
- 6.1.553 *"Now there is a need to send in prescriptions 2 weeks in advance of need. However, we have no trouble getting them delivered on time."* (Email 139)

- 6.1.554 *"Instead of growing our services, they are shrinking. The recent loss of boots (and their poor staffing of the pharmacy before this departure) has led to immense pressure on Shaunaks. I have experienced difficulty in obtaining the prescription needed (which forces me to travel to Chippenham which is a 20 minute drive away and impossible for those without transport and mobility/additional needs)." (Email 140)*
- 6.1.555 *"Corsham has shouldered more than its fair share of new housing developments over the last 10 years and yet there has been no expansion of healthcare services to meet the needs of the residents, both new and more established." (Email 141)*
- 6.1.556 *"We have been swimming in overdemand for pharmacy services and now, to make matters even worse, one of our two sites (Boots) has shut down, leaving just one (Shaunaks) on the outskirts of town. It is always overcrowded, sometimes the queue stretches outside the door into the open air, and a fair distance to walk if you are resident in the town." (Email 141)*
- 6.1.557 *"Whilst I am sure Shaunaks are doing their best the long queues, delays in getting prescriptions and lack an access to a pharmacist are ever present." (Email 142)*
- 6.1.558 *"I would not dream of queuing up at Shaunak's for health care advice, any more than I would to buy some paracetamol or a cough linctus. Pharmacies could be valuable in advising about minor illness, providing antibiotics [sic] as per protocols and many other services such as flu jabs. How on earth can the staff at Shaunaks have the time to offer any of these services?" (Email 148)*
- 6.1.559 *"But queuing outside for 20-30 minutes and waiting to be let in by the bouncer on the door is hardly the ideal service. That's hard for the elderly." (Email 150)*
- 6.1.560 *"Once inside, the pressure to process all customers as fast as possible means the staff inevitably have to rush, which is not great if you want to ask a couple of questions." (Email 150)*
- 6.1.561 *"delays in getting served mean that I now choose to shop for over the counter medications and first aid items by driving to Sainsburys or into Chippenham." (Email 155)*
- 6.1.562 *"This has greatly increased the pressure on Shaunak's and their home delivery service is not as efficient as it used to be. This means that I am now more likely to visit in person to collect my medication. The pharmacy is now very busy and has little space for customers. The consequence of this is that floor space inside the shop is packed with customers some of whom are clearly ill." (Email 159)*
- 6.1.563 *"very slow service. I took note of their request to give a week's interval between ordering a prescription and going to collect it, but even so, several times had to wait over an hour for a prescription to be prepared. Eventually I gave up using them and went to Box Pharmacy, but Box, is not part of my usual shopping routine." (Email 161)*
- 6.1.564 *"visit at any time of the day to Shaunaks to witness the number of customers, the lack of space for most basic health care goods, and the cramped area that the poor employees have to work in (There are usually about 6 or more employees in a minute room to process prescriptions)" (Email 164)*

- 6.1.565 *"With the increase in residents from the new housing being built, and an ageing population, surely the need for pharmacy service will only increase in the coming years."* (Email 165)
- 6.1.566 *"With the closure of Boots in the centre of town, it has left one pharmacy that is completely overwhelmed with the demand of the population for prescriptions, health products, children's needs, health advice and general well-being items. It can also be difficult for some disabled people to access this pharmacy."* (Email 167)
- 6.1.567 *"It is desperately needed by disabled residents who struggle to get to Shaunaks which is not served by a bus stop or easy to navigate pavements. They have limited stock & cannot cope with all medications required. Postal prescription companies are very poor, delays & wrong prescriptions sent make people wary of using them"* (Email 171)
- 6.1.568 *"Prescriptions are rarely made up ready for collection, even when they have been received by the pharmacy some 4 days earlier resulting in having to wait around or call back later whilst they are being dispensed."* (Email 174)
- 6.1.569 *"At one time we could collect prescription within two days . Now it is five and even then the prescription has not been prepared due to pressure of work."* (Email 183)
- 6.1.570 *"no time for supportive service. If anyone has a question to ask it feels uncomfortable due to the busyness of the shop. I once had a question as I had very, and needed advice."*
- 6.1.571 *The pharmacist kindly had a quick look, in public, which was not ideal, and the advice was rushed. Again, not her fault, she was needed elsewhere."* (Email 185)
- 6.1.572 *"usual visit to collect a prescription can take 30 mins or more. It is also notable that the staff of Shaunaks are under extreme pressure due to large numbers waiting to be served, I believe that the working area does not satisfy Health and Safety rules in regard to size of space per employee."* (Email 197)
- 6.1.573 *"If you wanted personal advice or to simply ask a question you feel like you are holding up the queue as people start to huff and puff and tut. Any delay in finding a prescription is often met with dismay/ anger/ disbelief and frustration-shaunaks [sic] are totally overwhelmed anyone can see that."* (Email 210)
- 6.1.574 *"Only the other day I had a prescription with the wrong number of tablets on it. The pharmacist told there was not enough time for them to alter the box into which they had squeezed the extra tablets."* (Email 221)
- 6.1.575 *"often provides a poor service - we would suggest this is due to the inadequacy of their existing premises and the overwhelming level of demand , coupled with the limited opening hours (9- 12.30 and 1.30 -6 Monday to Friday and 9-12 Saturdays). We have personally experienced errors, delays, confusion and a need to visit an alternative pharmacy when Shaunaks did not have the correct stock."* (Email 223)
- 6.1.576 *"we frequently suffer extended delays obtaining medicines (for chronic long term illness) which often causes stress and undue worry. At best we have to 'tactically' apply for repeat prescriptions to ensure that we continue to have emergency buffer stocks to hand – a ridiculous situation."* (Email 227)

- 6.1.577 *"Shaunaks is now the only pharmacy serving a large population- you have to wait for ages to collect a prescription & the shop isn't big enough to stock more than very basic essentials." (Email 246)*
- 6.1.578 *"The other one is over-subscribed. Always waiting ages for service." (Email 248)*
- 6.1.579 *"Since the start of this year, the duration of the request-fulfillment period has become less predictable and increased: traditionally this was of the order of 2-3 working days but now can stretch up to 5, and on more than one occasion I've had to return on another day to collect. It has also become noticeable that the queueing time in-store has increased – often there are 5-6 people waiting for service." (Email 251)*
- 6.1.580 *"I generally request mine about 10 days before I need them and this seems unreasonable to me." (Email 253)*
- 6.1.581 *"Shunaks pharmacy, it is obvious that they are struggling to keep pace with the demands being made on their services, and despite their best efforts there are almost always delays and long waiting times for prescriptions." (Email 258)*
- 6.1.582 *"There is often very little choice of over-the-counter remedies, and the queues are long with people whose only current option is to use this pharmacy for the prescriptions." (Email 261)*
- 6.1.583 *"we left shaunaks pharmacy for our repeat prescriptions due to them repeatedly getting the order wrong or not having the item and as such use Lloyds delivery service now." (Email 267)*
- 6.1.584 *"They are at breaking point, nobody can offer the best customer service when you are under so much pressure." (Email 279)*
- 6.1.585 *"I am currently using Shaunaks, where the staff are doing the best they can, but they are dealing with a huge number of patients now and I have noticed a significant delay in getting repeat prescription medications and even when I collect a few days after the medication should be ready, it has still not been put up and I have to wait for it." (Email 282)*
- 6.1.586 *"After waiting in a queue of about 15-20 people I eventually was served, only to be told after about 10 minutes of searching that my prescription couldn't be found. The young lady said she would arrange for another to be done and I could collect it another day. When I returned a few days later, it still wasn't there, however this time the lady did look on their system and actually had the prescription made up for me there and then. Again I had waited in a long queue." (Email 283)*
- 6.1.587 *"Whilst the service in Shaunaks is pleasant & polite there is now a considerable delay in obtaining medication, whereas previously there was a known time delay in placing a prescription & receiving the product. Now there appears to be no known time factor it could be 5 days or 7 days or more, it is never less than 5. I have my medication delivered & without fail I have to phone the pharmacy, after at least 7 days, to find out when I will have my prescription delivered." (Email 294)*
- 6.1.588 *"The population of Corsham has increased considerably in that time & we now have to suffer worse service than ever." (Email 294)*

- 6.1.589 *"Their level of service has diminished due to the increased demand and the footprint of Shaunaks does not lend itself to this; invariably with queues out the shop door, prescriptions are now either late in preparing or are lacking key components when made available" (Email 297)*
- 6.1.590 *"This causes confusion and delay while they try to find each prescription...The counter staff often appear stressed and stretched and who could blame them. People are often having to wait in the shop while prescriptions are got ready. Increasingly, some items won't be available or only half of them are, which means another visit to collect them after a day or two. It's a small space with insufficient seating and gets very crowded." (Email 313)*
- 6.1.591 *"I use shaunaks pharmacy and since Boots closed in Corsham there has been a marked deficiency in the service." (Email 318)*
- 6.1.592 *"Error in prescription causing me to take the wrong product which could have caused serious illness" (Email 319)*
- 6.1.593 *"With the best will in the world other shops in the town cannot provide the service a proper pharmacy can provide. Shaunaks provides an admirable service but it is not the same as a town centre facility where people can access their medical and personal needs without having to walk a considerable distance and queue for medicines and other (limited) supplies." (Email 322)*
- 6.1.594 *"Since the closure of Boots in Corsham, the pressure on Shaunaks has become immense and greatly affected their ability to provide a reasonable service." (Email 330)*
- 6.1.595 *"Although Shaunaks is working very hard to cope with the additional prescriptions it is clearly evident that they are finding it difficult as they have put up a poster specifically asking for 5 working days' notice (ie a week) for repeat prescriptions whereas before it was 48 hours' notice." (Email 338)*
- 6.1.596 *"Shaunaks do not have the time to offer assistance to customers who want advice on ears, colds and coughs ,headaches , children's ailments etc - the list is endless. If you go to Shaunaks it is so busy ,there is always a queue, you cannot manage to get anything off the shelves without ploughing through people. If you need to pick up a prescription you always need to wait as it is never ready." (Email 346)*
- 6.1.597 *"Not everyone in Corsham is a patient of the Porch surgery and Shaunaks pharmacy is too busy, parking is difficult, and it's just not in a convenient place to get to for a lot of people. We now lack front line medical service in the busiest part of town." (Email 353)*
- 6.1.598 *"As a prescription being delivered user of Shaunaks, I must state that since Boots have closed and they have inherited their customer base the service has gone through the floor at Shaunaks. Part deliveries are now the norm and we have even had other customers prescriptions left with us." (Email 355)*
- 6.1.599 *"However, since the loss of Boots it usually takes over a week, and on a number of occasions I have had to wait well over two weeks before the arrival of medication. This is a major issue as none of my medication can be stopped or missed as it is anticoagulants, heart and anti seizure medication. Because of this risk of delay I always order at least two weeks before I run out of my medicine, but there have been times when my ordered prescription did not arrive in time as the current pharmacy (Shaunaks) simply does not have the*

capacity required to manage the Healthcare of an entire town the size of Corsham and the surrounding villages.” (Email 356)

- 6.1.600 “More often than not when i finally get served the prescription isn't ready so I have to wait or call back. Even if I wait the allocated time of 5 days. Shaunaks is small and unable to cope with demand as it is.” (Email 365)
- 6.1.601 “it is only a small premises and simply cannot cope and is overwhelmed by the number of NHS prescriptions it has to provide and does not have the capacity for very much in the way of over-the-counter medicines (coughs and cold medicines and basic first aid items).” (Email 369)
- 6.1.602 “Although my husband has a regular repeat prescription, and this is sent to Shaunaks at least a week before it is needed, when calling to pick it up, it is invariably not yet ready and he has to wait until it is put together.” (Email 370)
- 6.1.603 “The people who decided this have clearly no idea of how long we have to wait in our current out of town pharmacy to get service. It can take up to a week from a prescription request to obtain the goods and it feels almost this long waiting to be served! On at least 3 occasions I have left and come back another time as the line of customers was outside the door.” (Email 371)
- 6.1.604 “I don't know why Shaunaks say they can cope when it's obvious they can't! The 3 day prescription collection time now takes at least 5 to 7 days if you don't want a long wait in the shop.” (Email 376)
- 6.1.605 “Invariably I have to wait up to 15 minutes as my prescription has not been “made up”. Sometimes the premises are so full that you have to hang about outside. Not ideal if you have health issues. Then you cannot hear your name being called and one of the staff has to come outside looking for you to hand over your medication. This in turn stops them dealing with other customers.” (Email 379)
- 6.1.606 “Finally there will be a queue of people (generally senior citizens) waiting for an injection. This queue could be inside but on busy days it snakes around the terrace outside which often confuses new arrivals who think it is for the pharmacy counter.” (Email 379)
- 6.1.607 “The increase in workload seems to be having a detrimental effect on the ability of the staff to provide an efficient, accurate and polite service to their customers....My wife has experienced rudeness; the staff seemed stressed by the additional workload. In addition my neighbour was provided a prescription that was rated at twice the required dosage.” (Email 380)
- 6.1.608 “Shaunaks has been acting at or over capacity for some time and is inaccessible for some people as it is relatively far from a bus stop and out of the town centre.” (Email 387)
- 6.1.609 “The current pharmacy cannot cope - patients are waiting for 40-50 minutes at times. I have personally had to stand in line for 50 minutes with a newborn baby.” (Email 389)
- 6.1.610 “Shaunaks, whilst providing an excellent service, are completely swamped and a visit there at any time of the day during opening hours will nearly always see a queue formed outside.” (Email 393)

- 6.1.611 *"Limited availability of essential products: I have noticed that certain over-the-counter medications, such as those for cold and flu, as well as essential first aid products, are often unavailable due to the increased demand. This has made it difficult to manage common health issues promptly." (Email 397)*
- 6.1.612 *"There have been other occasions where we spent over 50 minutes waiting for prescriptions, and at times, we have found essential medications out of stock." (Email 400)*
- 6.1.613 *"In my experience Shaunaks service is less than adequate." (Email 403)*
- 6.1.614 *"The staff in Shaunaks are working very hard to supply all of Corsham, but it can mean up to an hour to get there and wait as they are so busy. I have been in the queue before now when frustration at waiting has meant patients have been loudly complaining at the wait while they are trying their best to provide a service. That must make for very unpleasant working conditions for the people of Shaunaks." (Email 405)*
- 6.1.615 *"The sit/wait facilities for waiting for prescriptions to be made up is not large enough for the premises and there is a heightened risk of spreading germs." (Email 407)*
- 6.1.616 *"The staff are constantly stressed and it is often, not always, a stressful event going there for prescriptions. You often have to wait up to half an hour if your prescription is not ready. And when it's vaccination day it's chaos." (Email 411)*
- 6.1.617 *"Although the staff at the remaining pharmacy work extremely hard to meet the needs of the community they are often under stress and there are often queues of customers waiting up to half an hour to be served" (Email 412)*
- 6.1.618 *"A new pharmacy in town would be a vital service to the community, and would relieve pressure off of Shaunaks." (Email 418)*
- 6.1.619 *"When I was last at Shaunak's pharmacy it was very, very busy with people waiting for prescriptions and other people waiting for vaccinations - consequently there were no seats left if needed." (Email 423)*
- 6.1.620 *"There are two others nearby, Shaunak's and Box Pharmacy. We used the second but have now changed to the first. Both have rather small premises and both give services that could be improved." (Email 427)*
- 6.1.621 **Conclusion**
- 6.1.622 We conclude that there is an overwhelming body of evidence highlighting the urgent need for pharmaceutical services in Corsham town centre. Shaunaks is so busy it is unable to guarantee patient safety with regard to dispensing, let alone provide advice and Pharmacy First effectively. We also do not consider queuing in the rain as representative of reasonable choice and access to provision.
- 6.1.623 It is clear that local residents only access pharmaceutical provision within Corsham and do not go outside of Corsham for these services. This is demonstrated by Shaunaks items increasing despite the terrible service – Corsham residents are forced to endure the service provided by Shaunaks and have no choice in this matter.

6.1.624 There is also a requirement for a pharmacy that opens during lunchtimes within Corsham. We submit that granting this application will secure improvements and better access to pharmaceutical provision and thus meets the criteria for Regulation 18.

6.1.625 We invite the Committee to grant the application.”

6.1.626 [See “Appendix A” copy emails redacted by NHS Resolution on page 3 to 429 of Appendix F]

7 Comments on Late Observations

7.1 CORSHAM TOWN COUNCIL

7.1.1 “Thank you for your letter dated 18 December 2024 regarding the above appeal to NHS Resolution, and the opportunity to make final comments. Corsham Town Council would like to emphasise the huge gap between what residents have experienced in terms of current/recent pharmacy services in Corsham and what has been claimed in previous correspondence by third parties.

7.1.2 You will have read residents’ concerns about queuing and the use of a ‘security guard’ to manage these queues at Shaunaks, which demonstrates the extent of local concerns.

7.1.3 If you need any further information from us, please do not hesitate to contact me.”

7.2 SHAUNAKS LIMITED REPRESENTED BY RUSHPORT ADVISORY LLP

7.2.1 “I act for Shaunaks Limited and have been instructed to submit these final comments in response to your letter and attachment of 18 December 2024.

7.2.2 Preliminary Point

7.2.3 The Committee will note that in our letter of 23 October 2024 which was submitted in response to this appeal we stated;

7.2.3.1 *As a final point, my client is concerned that the Applicant’s representative intends to use their opportunity to comment on this letter as an opportunity to provide additional new evidence to the Committee. The Applicant has had many months to collate its evidence and should not engage in an abuse of process to submit new matters at this late stage in proceedings and this is also made clear in the letters sent to Applicant by Primary Care Appeals.*

7.2.4 We have now been served with a 489 page document and this is a gross abuse of the process that Primary Care Appeals applies to appeals.

7.2.5 When the Applicant submitted their appeal, it will have received a letter from PCA that stated;

7.2.5.1 *The appeal should have included any new material that you wanted NHS Resolution to consider. Anything new raised later in this process will have little or no weight placed upon it unless it can be demonstrated that it is adduced by way of rebuttal of the representations received from parties.*

- 7.2.6 Further, when the Applicant was provided with our response to their appeal it will have received a letter from PCA stating;
- 7.2.6.1 *You should restrict yourself to rebuttal of the information already provided; no new matters should be raised at this stage.*
- 7.2.7 Your letter of 18 December 2024 describes the submission by the Applicant as being “exceptionally large” and apologises for delay in circulating the submission even though the delay was not the fault of Primary Care Appeals.
- 7.2.8 At this stage it is worth noting that the Applicant has engaged a professional advisor to represent it. Healthcare Plus Consulting (“HPC”) holds itself out as an expert advisor to clients seeking inclusion in the pharmaceutical list.
- 7.2.9 HPC’s website describes it as “*The experts in Pharmacy Sales & Pharmacy Regulatory Paperwork*” and having “*vast experience*” which it claims is “*unmatched*”. HPC has represented and is still representing Applicants and is very familiar with the process and rules applied by Primary Care Appeals.
- 7.2.10 HPC is therefore well aware that the tactic it has employed of submitting nearly 500 pages of additional new material at the final comments stage is an abuse of process.
- 7.2.11 Were this to be a matter that was in front of a court we would be asking for the application to be dismissed with prejudice due to the behaviour of the Applicant. Unfortunately, the option to dismiss with prejudice is not available to the Committee, but we ask in the strongest possible terms that the Committee applies its own rules and guidelines and places no weight on this new evidence.
- 7.2.12 HCP is quite clearly testing to see if this tactic will be accepted by Primary Care Appeals so that it can be used in other cases.
- 7.2.13 Clearly neither Rushport nor my client should be expected to respond properly to this new evidence. However, my client has asked that we highlight to the Committee the manner in which the evidence was obtained by the Applicant.
- 7.2.14 Below are screenshots from Facebook posts made by HCP.
- 7.2.15 The first post from Aman Koria of HCP is dated 12 October 2024.
- 7.2.16 [See Screen shot page 1 -2 – Appendix G]
- 7.2.17 HCP states that by 12 October 2024 they had received only 4 letters of complaint from the public despite months of campaigning for support.
- 7.2.18 HCP then tells patients what they should complain about, listing specific points for people to write. Unsurprisingly they then receive emails that list these points.
- 7.2.19 In response to the Facebook post one patient called it a scam.
- 7.2.20 [See Screen shot page 3 – Appendix G]
- 7.2.21 My client’s understanding from patients is that HCP then offered to provide template or model letters for patients to use in case they could not think of any real complaints.

7.2.22 The Applicant even resorted to having a person stand outside my client's pharmacy to approach patients and ask them to agree to complain about the service offered by my client. Patients then contacted my client to say that they had felt harassed by the Applicant. The vast majority of patients simply refused to provide letters or emails and offered instead to write letters to support the service provided by my client..

7.2.23 This is a blatant and highly unprofessional abuse of process by the Applicant and should be treated as such.

7.2.24 Limited Response to Final Comments

7.2.25 Despite the comments above, the Applicant does respond briefly to some of the matters we raised in response to their appeal. In order to demonstrate how unsatisfactory their response is we have copied below the points we made along with the Applicant's response to those points.

7.2.26 Location

7.2.27 *We note that the Applicant has provided a best estimate address that is extremely vague, ie the "main commercial area of Corsham". It is unclear what area this covers as there is no definition provided, but this area would likely include the location of my client's pharmacy and the site of the local doctor's surgery.*

7.2.28 The Applicant has confirmed that their best estimate is as per the map provided with their application. This would place any new pharmacy approximately 400 metres from my client's existing pharmacy. It is not credible to suggest that patients have difficulty accessing my client's pharmacy that and such difficulty would be remedied by having another pharmacy 400 metres away.

7.2.29 [See arial view page 4 – Appendix G]

7.2.30 We note that the Applicant has provided information in relation to accessing pharmacies other than my client's pharmacy. Unfortunately, this information is not correct. We have copied below the Applicant's submission and then highlighted the errors and omissions.

7.2.30.1Box Pharmacy, SN13 9RG

7.2.30.2This pharmacy is 1.9 miles away or a 15-minute bus journey from the proposed site, via the 231 bus. However, this bus is infrequent and only runs every half an hour.

7.2.31 The Applicant seeks to avoid consideration of the X31 bus service which takes 10 minutes to go from the Applicant's proposed location to Box Pharmacy. This includes 2 minutes of walking time. The X31 is an hourly service leaving Corsham at 10 minutes past each hour. The 231 bus service then also operates every 30 minutes, which means that there are 3 buses per hour from Corsham to Box Pharmacy for those who wish to not use the pharmacy in Corsham and instead choose to travel outside Corsham to avail of reasonable choice.

7.2.32 Response: HCP accepts that they omitted consideration of this bus service.

7.2.32.1Allied Pharmacy, Hathaway Medical Centre, SN14 6GT

7.2.32.2 *This pharmacy is 4.2 miles away or a 20-minute bus journey from the proposed site, via the 231 bus. As highlighted above, this bus is infrequent and only runs every half an hour. After alighting from the bus at Saxon Street, patients will still have a 0.5-mile one-way journey to access the pharmacy.*

7.2.33 Whilst it is correct that accessing this pharmacy involves a 20 minute bus journey and 0.5 mile walk if using the 231 bus, there is no reason for any patient to make such a journey as it would ignore other pharmacies that are much easier to access. There is no requirement for every pharmacy to be easily accessible in order to demonstrate reasonable choice.

7.2.33.1 Rowden Hill Pharmacy, SN15 2SD

7.2.33.2 *This pharmacy is 3.6 miles away or a 15-minute bus journey from the proposed site, via the 231 and X34 bus. We do not consider taking multiple buses to access pharmaceutical provision as representative of reasonable choice or access. Additionally, these buses can only be caught consecutively every hour, and thus is very infrequent. Again, we submit that potentially having to wait for an hour for a bus on a return journey from visiting a pharmacy is not representative of reasonable choice or access.*

7.2.34 The Applicant has (again) ignored the X31 bus service which takes 18 minutes (including walking time) to go from the Applicant's proposed location to Rowden Hill Pharmacy. The X31 is an hourly service leaving Corsham at 10 minutes past each hour. The 231 bus service then also operates every 30 minutes, which means that there are 3 buses per hour from Corsham to Rowden Hill Pharmacy for those who wish to not use the pharmacy in Corsham and instead choose to travel outside Corsham to avail of reasonable choice.

7.2.35 Given the availability of alternate pharmacies by public transport we have not considered access to pharmacies that are further away as there is no need to. Bus timetables are attached to this letter.

7.2.36 **RESPONSE: HCP accepts that they did not consider the availability of bus services to alternate pharmacies.**

7.2.37 My client not only offers, but also provides significant numbers of consultation for advanced / enhanced and locally commissioned services. My client's pharmacy acts as a health hub for additional primary care services and is well used and supported by patients.

7.2.38 The Applicant offers only Monday to Friday opening, compared to the Monday to Saturday opening provided by my client. The only additional opening hours offered by the Applicant are from 12.30 pm to 1.30 pm Monday to Friday, however they offer no Saturday opening.

7.2.39 My client has already provided (in their initial objection letter to this application) evidence on the availability of car / van transport and evidence in relation to health of the local population. It is notable that the Applicant has chosen to provide no information of this type as they recognise that the local population is in better health than the average for England and the local population has better access to their own transport than the English average

- 7.2.40 Turning to the part of the appeal document titled “Corsham New Contract Supporting Information”, there are other errors, contradictions and omissions that the Applicant has made.
- 7.2.41 The Applicant states that surrounding villages are served by Corsham. Whilst those living in surrounding villages may indeed use Corsham for services, they are not living on bus routes and would be using their own transport to access Corsham. For those residents it would be just as easy to access areas such as Box Hill or Chippenham where multiple alternate pharmacies are located, but the Applicant simply ignores this.
- 7.2.42 The Applicant then asks the Committee to “extrapolate” this population. This is a somewhat bizarre suggestion which again simply ignores the other pharmacies located close to Corsham which have already been detailed above.
- 7.2.43 **RESPONSE: HCP does not dispute the above evidence.**
- 7.2.43.1 *The Applicant asks the Committee to read the reasons provided by patients for signing the petition to keep Boots open. As the Committee will note, the reasons provided focus on pharmacy (in general) being an “essential service”, or Boots offering collection of online orders from their pharmacy. There is no mention of any patient experiencing difficulty accessing my client’s pharmacy.*
- 7.2.44 It is factually correct that the Applicant provided no evidence of patients experiencing difficulty accessing my client’s pharmacy. The Applicant cannot claim that a 489 page document is rebuttal to this statement as it was not making an evidential point, but simply highlighting the lack of evidence provided by the Applicant. Put simply, you cannot “rebut” your own lack of evidence.
- 7.2.45 Whilst I have advised my client that there is no requirement for them to address the matters raised by the Applicant given the manner in which support was elicited and the behaviour of the Applicant / their advisors, they were angry to read so many falsehoods in the limited time available to review the new evidence.
- 7.2.46 The Applicant quotes a letter from the Town Council and states;
- 7.2.46.1 *“Shaunaks admitted in a meeting with the Town Council on 26 June 2024 that they lack the space to handle services which government is asking pharmacists to deliver. They say their biggest issue in Corsham is their current building. A second pharmacy in Corsham would alleviate this pressure. At that meeting they also admitted that a second pharmacy would be good for residents.”*
- 7.2.47 This simply did not happen and my client made no such comments. My client has contacted the Town Council directly and asked them to withdraw this comment.
- 7.2.48 My client has never employed a “bouncer” to manage a queue, never taken 2 weeks to make up a prescription (unless an item as out of stock), never refused entrance to the pharmacy to any patient, never receive complaints about car parking or disabled car parking and has never seen patients queuing outside in the rain, other than during COVID restrictions some years ago.

- 7.2.49 We have attached the latest Patient Satisfaction Survey for my client's pharmacy. The survey was conducted in October 2024 and shows patients having a very positive view of the pharmacy and services provided. Naturally, we would expect the Committee to give no weight to this survey assuming no weight is given to the Applicant's new evidence.
- 7.2.50 Despite the attempt by the Applicant to stir up complaints about my client's pharmacy by telling patients what they should complain about, my client continues to provide an excellent service to those who live in or visit Corsham. On the key issues of access and reasonable choice it is clear that the application fails and the appeal should be dismissed.
- 7.2.51 **Previous Boots Pharmacy**
- 7.2.52 As the Committee will be aware, this application was prompted by the closure of a Boots pharmacy. That Boots pharmacy dispensed only 2,000 items per month. Patients had the choice of using it, but very few chose to. Had the Applicant's comments in this case been true then Boots would have been much busier. The Applicant attempts to deal with this by saying that the service Boots offered was "unreliable". The Committee will note that there is no evidence whatsoever to back up this claim.
- 7.2.53 We look forward to hearing from you in due course."
- 7.2.54 [See Shaunaks Pharmacy Patient satisfaction Survey Results (October 2024) page 5 - 7 of Appendix G and
- 7.2.55 Bus times tables X31 and 231 page 8 - 9 of Appendix G].

8 **Unsolicited Comments (received 10 January 2025)**

8.1 **UNSOLICITED COMMENT**

- 8.1.1 "I would wish to add my views to those already expressed concerning the lack of provision of pharmaceutical provision in Corsham & the Careplus application.
- 8.1.2 Corsham is a growing town with now only one small pharmacy, since the closure of Boots, servicing its needs. The situation is exacerbated by the closure of Lloyds in Sainsbury's only 3 miles away & the imminent closure of the Box pharmacy.
- 8.1.3 Although Shaunacks [sic] provides an adequate service, the facilities are inadequate. This leads to not only delays in prescriptions being filled, but enormous queues (overseen by a volunteer "bouncer" outside). It cannot be right that customers have to queue in the cold, especially in winter, especially as by definition they are either currently ill or in need of continuing medication for an underlying complaint.
- 8.1.4 I, myself, have numerous repeat prescriptions & in order to ensure I have continuity of medication I put in my request 2 weeks before I need it (no great imposition normally) & then have waited in the cold for up to 25 minutes waiting to collect.
- 8.1.5 This wait is also necessary if customers want nonprescription treatments for coughs, colds, athletes foot or whatever. The very small local supermarket only has the capacity to stock a very limited range.

- 8.1.6 The other major issue is that Shaunacks [sic] does not have the capacity to offer the services designed to relieve the pressure on GPs: advice on medication & side effects (Pharmacists are actually the best people to advise on this). They also don't have the capacity to adequately administer flu injections etc: something that is pertinent when one sees the spike in hospital admissions for flu.
- 8.1.7 I am not advocating for one additional provider over another, but whilst the ICB (or whoever) remains intransigent in allowing a replacement pharmacy (NB: replacement, not new) the residents of Corsham & outlying areas suffer.
- 8.1.8 Please overturn this decision as I believe the data does not support it."

Prepared by:

Alison McCafferty, Case Manager. 16 January 2025