



**NHS HIGHLAND &  
Zakpharma Ltd  
(Intended Applicant – Mr. S.A. Kazam)**

**CONSULTATION ANALYSIS  
REPORT (CAR)**

**29<sup>th</sup> January, 2024 – 5<sup>th</sup> June, 2024**

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# 1. EXECUTIVE SUMMARY

NHS Highland and Zakpharma Ltd undertook a joint public consultation exercise with regard to Zakpharma Ltd's intention to open a new pharmacy in Campbeltown, 2 Mafeking Place, 10 Longrow PA28 6DD. There is currently one community pharmacy located in Campbeltown within the Town Centre following the recent Boots closure of their community pharmacy located at 19 Main Street, Campbeltown on 18<sup>th</sup> November 2023. The current population of Campbeltown is circa 4490 as at 30<sup>th</sup> June, 2021

Carrying out a joint consultation during the pre-application phase is a requirement of the NHS (Pharmaceutical Services) (Scotland) Regulations 2009 since 2014. The Regulations set out the requirements for the consultation process and these have been followed by both parties.

The purpose of the joint consultation was to seek the views of the local residents as to whether they think they have adequate access to community pharmacy services in the area, and to measure the level of local support for the potential of a new pharmacy in the area.

A joint consultation and engagement plan was agreed between NHS Highland and Zakpharma Ltd with the knowledge of the Scottish Health Council. The consultation was required to run for 90 working days and took place from 29<sup>th</sup> January, 2024 to 5<sup>th</sup> June, 2024 (allowing for Public Holidays during that time – 29<sup>th</sup> March, 1<sup>st</sup> April & 6<sup>th</sup> May, 2024).

A total of **955** survey responses were received from members of the public; **220** via hard copy questionnaire, (**43** of which were incomplete) and **735** via the Microsoft Forms questionnaire. Therefore, **912** were considered viable for the purpose of this exercise. One hard copy questionnaire was received after the closing date and is not included in the above numbers.

The survey link was made available to the applicant as well as being posted on the NHS Highland website. Based on all the feedback there was a strong consensus across all elements of the consultation to be in favour of the Application.

This summary report has been prepared jointly by NHS Highland and Zakpharma Ltd.

On completion of this report the Applicant will then decide whether or not they wish to submit an application under the Regulations to NHS Highland to apply for an NHS contract for a pharmacy in Campbeltown, Argyll & Bute.

## 2. INTRODUCTION

The NHS (Pharmaceutical Services) (Scotland) (Miscellaneous Amendments) Regulations 2014 introduced a change to previous consultation arrangements for applications to join the Board's Pharmaceutical List.

Under the new arrangements, parties are required to carry out a joint consultation, and the Regulations set out the requirements to be followed.

Zakpharma Limited held an initial informal meeting with NHS Highland on 5<sup>th</sup> December, 2023 at 2.00 pm following which the public consultation procedure was discussed.

This report summarises the approach and findings from developing the consultation plan through to describing the consultation feedback, which ran for 90 working days from 29<sup>th</sup> January, 2024 to 5<sup>th</sup> June, 2024 (allowing for Public Holidays during this time).

## 3. AIMS

The aims of the process were to agree a joint consultation plan, carry out a joint consultation exercise and report on the findings.

Specifically in terms of the scope of the consultation, the aim of the questionnaire was to:

- Seek the views of local people as to whether they feel they have adequate access to pharmacy services in the area.
- Measure the level of support for the potential new pharmacy in the area.

## 4. METHODOLOGY

### 4.1 Communications and Engagement Plan

Meetings took place between representatives of NHS Highland and Zakpharma Ltd to discuss how to take forward the pre-application joint consultation. This included briefings on the Regulations, the Board's Hours of Services Scheme and specifically any requirements regarding the consultation and consultation process.

Further discussions were undertaken and an Action Plan was developed which set out initial planned activities. Advice was sought from Scottish Health Council. However, to date, no response has been received from the SHC. The Chair of the NHS Highland Pharmacy Practices Committee (PPC) was informed of the possibility

of an Application.

The Action Plan was agreed by NHS Highland and Zakpharma Ltd (Appendix 1). It was understood that the Action Plan would be further developed, as required, to respond to any requests or address any emerging gaps in the plan but that any additional activity would be jointly agreed.

The joint approach to the consultation between NHS Highland and Zakpharma Ltd was agreed by both parties through written and telephone communication.

In addition to this, a joint meeting of the Applicant and members of the public and counsellors was held. This was held on 9<sup>th</sup> January, 2024. The meeting was not attended by members of the Health Board. In an effort to encourage completion of the questionnaire, the Applicant displayed a floor to ceiling poster on the proposed premises containing a barcode giving access to a digital copy of the questionnaire ; posters, roller banners, questionnaires and leaflets available in local shops; other healthcare premises; insertion into the local newspaper (Campbeltown Courier) as well as being made available to home carers, Care Homes for patients and staff to complete, local public services e.g. local schools and door to door with regular radio advertising and Facebook advertising.

## **4.2 Defining Location**

Pre-work was identified including preparation of a map to define the proposed neighbourhood for the potential new pharmacy together with proposed boundaries (detailed below). The defined neighbourhood would be served by the proposed pharmacy site as the area within the perimeter highlighted by the white border on the map shown in the questionnaire indicating the exact location of the proposed new pharmacy.



Boundaries :

- North – Tarbert Road
- West – Whitchburn Rd on to Whinhill Rd
- East – B842 meets Baraskomill Burn
- South – Crosshill Loch
- South East – Where Rocky Burn meets Kilkerran Rd
- South West – End of Tomaig Rd

### 4.3 Pre-consultation Activities

Other pre-consultation activities included identifying potential Interested Parties and other stakeholders, (this included Boots Pharmacy, 11 Longrow South, Campbeltown) preparing communication materials and developing a NHS Highland website presence.

All consultation materials were signed off by both parties. This was made available to members of the public along with an explanation of the Regulations process.

### 4.4 Raising Awareness of the Consultation

The Plan was split into phases to ensure a good spread of activity throughout the consultation period and to plan a balance of activities to be carried out by NHS Highland staff and the potential applicant. There was regular dialogue throughout the process between NHS Highland and Zakpharma Ltd.

Various approaches were used to raise awareness including an initial Press Release and subsequent reminder Press Release (Appendix 2 & 2a), posting on NHS Highland website including Twitter and Facebook. This is a formal requirement of the Regulations. The Applicant met with local Counsellors on 9<sup>th</sup> January, 2024.

#### 4.5 Consultation Survey Response Form

The consultation questionnaire was made available via a link on the Home Page of NHS Highland website.

The questionnaire was available for completion via an on-line MS Forms questionnaire or completion of a paper copy to be submitted to the Health Board prior to the closing date (5<sup>th</sup> June 2024). Paper copies were available on request from NHS Highland as well as the Applicant. One hundred printed forms were provided to the Applicant along with 100 self-addressed envelopes. The survey documentation (and communication materials) also provided contact details of NHS Highland administration staff should anyone wish support completing the questionnaire or requesting further advice. No such contact was made to the Health Board. Large font copies were available on request. No such request was received.

## 5. RESULTS

### Question 1

Zakpharma Ltd proposes to open a new pharmacy at 2 Mafeking Place, 10 Longrow, Campbeltown. PA28 6DD and states the neighbourhood as indicated on the map. The boundaries of this neighbourhood are :

North – Tarbert Road

West – Whitchburn Rd on to Whinhill Rd

East – B842 meets Baraskomill Burn

South – Crosshill Loch

South East – Where Rocky Burn meets Kilkerran Rd

South West – End of Tomaig Rd

*Do you think the area, outlined in white in the undernoted map, describes the 'neighbourhood' where the proposed community pharmacy will be situated ?*

Yes	800	88%
No	85	9%
Don't know	27	3%

## Question 2

*Do you live within the neighbourhood ?*

Yes	699	77%
No	213	23%

## Question 3

*Below is a list of services currently provided by any other community pharmacy in the surrounding area (with attached explanations of each service). Do you think the current provision is adequate ?*

Contracted services –

### MCR – Medicines; Care & Review

Yes	32.8%
No	49.8%
Don't know	17.3%

### Pharmacy First Service

Yes	35.6%
No	54%
Don't know	10.4%

### Acute Medication Service

Yes	31.3%
No	45.6%
Don't know	23.1%

### PHS – SC/EHC

Yes	33.4%
No	38.6%
Don't know	28%

### Unscheduled Care

Yes	24.5%
No	46.5%
Don't know	29.1%

### Advice to Care Homes

Yes	24.4%
No	26.3%
Don't know	49.3%

### OST Service

Yes	22.7%
No	24.3%
Don't know	53%

### Care at Home

Yes	24.3%
No	39.3%
Don't know	36.4%

### Palliative Care

Yes	28.8%
No	30.3%
Don't know	41%

### Clozapine Dispensing

Yes	19.5%
No	21.1%
Don't know	59.4%



#### Vaccine Administration

Yes	32.5%
No	37.4%
Don't know	30.1%

#### Medication Compliance Support

Yes	26.4%
No	30.6%
Don't know	43.1%

#### Hep C Drug Dispensing

Yes	20.6%
No	21.5%
Don't know	58%

#### Prostate Cancer Drug Dispensing

Yes	23.9%
No	22.2%
Don't know	53.9%

#### Stoma Care

Yes	22.2%
No	25%
Don't know	52.7%

#### Emergency Naloxone Supply

Yes	19.9%
No	22.2%
Don't know	57.9%

#### Gluten Free Foods Service

Yes	23.6%
No	31.8%
Don't know	44.6%

### Question 4

*The pharmacy additionally wishes to provide the below services. Do you think the provisions, outlined in Q3 along with the additional services outlined below, would be adequate ?*

Yes	866	95%
No	45	5%

### Question 5

*If YES, please comment below.*

538 Responses (See Appendix 4 for free text responses)

### Question 6

*If NO, please comment below*

25 Responses (See Appendix 4 for free text responses)

An overwhelming majority (95%) believe that the additional services along with others mentioned previously would adequately service the area. Of the 560 comments made, 40% commented they were in support of the extra services the Applicant wishes to provide, 15% commented they were in support of a delivery service.

It should also be noted that a small percentage (1%) of people commented they were satisfied with the current pharmacy services.

## Question 7

*Are there any other NHS services you think the intended Applicant should provide ?*

Yes	93	10%
No	202	22%
Don't know	616	68%

Of the 93 positive responses 12 would welcome a delivery service. Other services mentioned included weight management, private vaccines. However, none of the above are NHS services but would be considered as private services made available by the new pharmacy.

Of the 818 responders answering No/Don't Know, no comments were received.

## Question 8

*If YES, please comment below*

85 Responses (See Appendix 4 for free text responses).

## Question 9

*What do you think about the intended Applicant's proposed opening hours ?*

Monday to Friday		Saturday	Sunday
Just Right	96.9%	96.4%	83.5%
Too Short	1.8%	2%	9.4%
Too Long	1.1%	1.2%	0.5%
Don't Know	0.2%	0.3%	6.6%

## Question 10.

*Comments*

318 Responses (See Appendix 4 for free text responses)

As seen above 97% of the respondents agreed with the proposed opening times for Monday to Friday, 96% agreed opening times for Saturday and 84% felt it was right.

However, of the 51 comments received 38 responded to be in favour of some Sunday opening hours.

### Question 11

*Do you or your representatives experience any issues or challenges accessing a community pharmacy ?*

Yes	451	50%
No	460	50%

### Question 12

*If YES, please comment below*

395 Comments (See Appendix 4 for free text responses)

### Question 13

*If NO, please comment below*

167 Comments (See Appendix 4 for free text responses)

Of the 50% positive responses, comments included access difficulty due to lengthy queues, staff workload, incomplete prescriptions and lengthy turnaround times as well as unscheduled closures. Comments were also received about the advantage of longer opening hours.

Of the 167 responders who commented they did not face challenges, some comments were still made regarding length of queues, increased staff workload and incomplete prescriptions.

### Question 14

*If a community pharmacy opened at these premises would it change the way you currently access NHS pharmaceutical services ?*

Yes	689	76%
No	222	24%

### Question 15

*If YES, please comment below*

456 Responses (See Appendix 4 for free text responses)

### Question 16

*If NO, please comment below*

87 Responses (See Appendix 4 for free text responses)

Of the 911 responders 76% agreed an additional pharmacy would change the way they currently accessed NHS pharmaceutical services. Comments included making use of extended opening hours, access to delivery service thus relieving pressure on existing pharmacy and other NHS services, as well as offering freedom of choice. Also, the lengthy waiting times for medication and lengthy queues.

Those responders replying the additional pharmacy would not change the way they accessed pharmacy services also commented on the lengthy queues and reduced waiting times. The advantages of having a second pharmacy with regard to ease of access, delivery service as well as easing pressure on GPs was commented albeit currently being registered with a dispensing practice.

### Question 17

*Do you think there will be any positive impact or benefit to the neighbourhood in having a new community pharmacy ?*

Yes	878	96%
No	14	2%
Don't know	19	2%

### Question 18

*If yes, please comment below*

544 Responses (See Appendix 4 for free text responses)

The 96% of responders felt the intended proposed pharmacy would positively impact on the neighbourhood.

Responses included choice of pharmacy (13%), reduced waiting times/long queues (21%), relieving pressures on current services (15%) and improved services (11.2%). 15% commented that the additional services on offer by the applicant would be positive for the neighbourhood.

A small number of responses included comments such as alleviating stock issues, the current pharmacy being too small for the size of the population it served, employment opportunities and improving accessibility.

### Question 19

*Do you think the intended Applicant's proposed pharmacy will impact on other NHS funded services (either positively or negatively) such as GPs, community nursing, other pharmacies, dentists, optometrists or social services ?*

Yes	450	49%
No	297	33%
Don't know	164	18%

## Question 20

*If YES, please comment below*

369 Responses (See Appendix 4 for free text responses).

Of the 450 responses (49%) that submitted 'Yes', the comments included; easing the pressures of current GP service, reducing demand on existing services and easing workload pressures on the existing pharmacy, enhanced patient care, reduced number of visits to A & E as well as benefiting Social Care Services by freeing up the Carers' by making use of the proposed delivery service. No negative comments were received in answer to this question.

## Question 21

*The applicant believes that the current provision of pharmaceutical services to the neighbourhood is inadequate. Do you support the opening of a new community pharmacy in Campbeltown ?*

Yes	895	99%
No	10	1%

## Question 22

*If YES, comments below*

537 Responses (See Appendix 4 for free text responses)

## Question 23

*If NO, comment below*

8 Responses (See Appendix 4 for free text responses)

The majority of responders (99%) supported the application for a new pharmacy and were of the belief current services were inadequate.

Responders commented on the difficulty in providing services following the closure of Boots Pharmacy, Main Street, Campbeltown where they have been experiencing issues such as delays in prescriptions being dispensed, return visits to the pharmacy, increased waiting times/long queues, stock issues, overall inadequate service and the pharmacist being unavailable for consultation.

Responders also commented the current pharmacy being too small to serve the neighbourhood and had issues with the lack of privacy.

Of the eight responses that didn't agree to question 21, comments were received with regard to the opening of a new pharmacy, five comments suggested current services being adequate, one preferred a GP practice being opened as opposed to a pharmacy and two comments stated current services be enhanced instead of granting a new pharmacy.

## Question 24

*How did you become aware of this consultation ?*

Advert	178	20%
Website	39	4%
Social Media	515	57%
Other	173	19%

## Question 25

*Respondent Information*

Individual	900	99%
Organisation	5	1%

## Question 26

*Please give an indication on how many are in your group or organisation*

0-10	3	60%
10-50	1	20%
50+	1	20%

## Question 27

*Name and organisation name (if applicable)*

303 Responses (See Appendix 4 for free text responses)

## Question 28

*Address & Postcode*

373 Responses (See Appendix 4 for free text responses)

## Question 29

*Email address*

316 Responses (See Appendix 4 for free text responses)

This summary report has been prepared jointly by NHS Highland and Zakpharma Ltd.

On completion of this report the Applicant will then decide whether or not they wish to submit an application under the Regulations to NHS Highland to apply for an NHS contract for the pharmacy in Campbeltown.

## 6. CONCLUSION

The challenge of a consultation is always to reach as many interested parties as possible, to give them the opportunity to state their views. A wide-ranging approach was used including local media coverage by the Health Board, newspaper article in the form of a Press Release, Facebook, Twitter and meetings with the local community by the Applicant. An approach was extended to Scottish Health Council for comments, however, to date no reply has been received.

As evidenced by the number of responses received (912) there has been a clear positive support registered for this Application to go ahead. This is evidenced by the concerns expressed by the public regarding the closure of one of the Boots pharmacies recently, resulting in long queues, staff workload pressures, length of time experienced obtaining some medications and a general feeling of inequality in the availability of some services. However, as seen above there were responders who reported being satisfied with the current service provided or intended continuing with their own arrangements (8 responders).

88% of the responders agreed with the defined neighbourhood, however 9% disagreed.

77% of the responders resided within the neighbourhood with 23% residing elsewhere.

95% of the respondents believed that the services outlined in question 3 along with additional services proposed by the Applicant would be adequate. However, 5% disagreed. Further interpretation was difficult due to the responses not being appropriately related to the question.

With regard to the question of other NHS services wishing to be provided by the Applicant 68% were unsure, 22% were satisfied with the current service proposed and 10% felt there could be additional services provided.

Approximately 97% of the respondents agreed with the proposed opening times for Monday to Friday, 96% agreed an opening times for Saturday and 84% felt it was right, however of the 51 comments 38 favoured some Sunday opening hours.

An equal balance of 50/50% of responders experienced issues or challenges accessing a community pharmacy. Examples included lengthy queues waiting on prescription collection, out of stock medication resulting in delays in obtaining medication, apparent staff workload. Mobility issues was reported as being a challenge whether it was lack of parking or inability to wait in long queues. Of the responses where there was no report of challenges experienced, many responses noted that in their advancing years, this may pose a problem and may welcome the additional pharmacy.

76% agreed an additional pharmacy would change the way they currently access NHS Pharmaceutical Services referencing the additional opening hours which accommodated members of the public accessing pharmaceutical services after normal working hours, making use of the additional (non-contractual) services on offer by the Applicant or allowing the public freedom of choice. It should be noted that the additional non-contracted services being offered by the Applicant at this stage can be removed by the pharmacy at any time as they are not considered core contracted services. Comments included that they would use the delivery service either for themselves or for an elderly or infirm relative. Of those who felt the additional pharmacy would not change their usual

way of accessing pharmaceutical services, it was reported that they felt it would still be beneficial to the town, others would continue to pick up their medication from their own dispensing GP.

With regard to whether the public felt the intended proposed pharmacy would impact positively on the neighbourhood 96% felt that it would. Comments such as relieving pressure on the existing pharmacy, better quality of service and reduced levels of frustration. However, with regard to the specific questions, many responders failed to actually answer the question appropriately but rather repeated with similar responses e.g. waiting times, accessibility, freedom of choice.

Similarly, with regard to whether the public felt the intended proposed pharmacy would impact on other NHS funded services, 49% agreed. However, once again many of the responders failed to appropriately answer this question repeating similar answers as above with some suggesting the additional pharmacy would reduce demand, enhance patient care, reduce number of visits to A & E and reduce number of GP visits allowing GPs to concentrate on more serious patients. Responders also referred to the lack of dental services in this questionnaire. There were no negative comments with regard to this question.

In summary, the majority of the responses (99%) were positive in their opinion supporting the opening of a new Community Pharmacy in Campbeltown, with only minimal responses expressing satisfaction with the current provision.

In summary, the vast majority of the respondents supported the proposed Application of a new community pharmacy in Campbeltown.



## Appendix 1 – Action Plan



Action List.docx

## Appendix 2 – Press Release



29.01.2024 -  
Campbeltown Pharr

## Appendix 2a - Reminder



pharmacy1.pdf



pharmacy2.pdf

## Appendix 3 - Questionnaire



Community  
Pharmacy Applicatio

## Appendix 4 – Free text to questions within the questionnaire

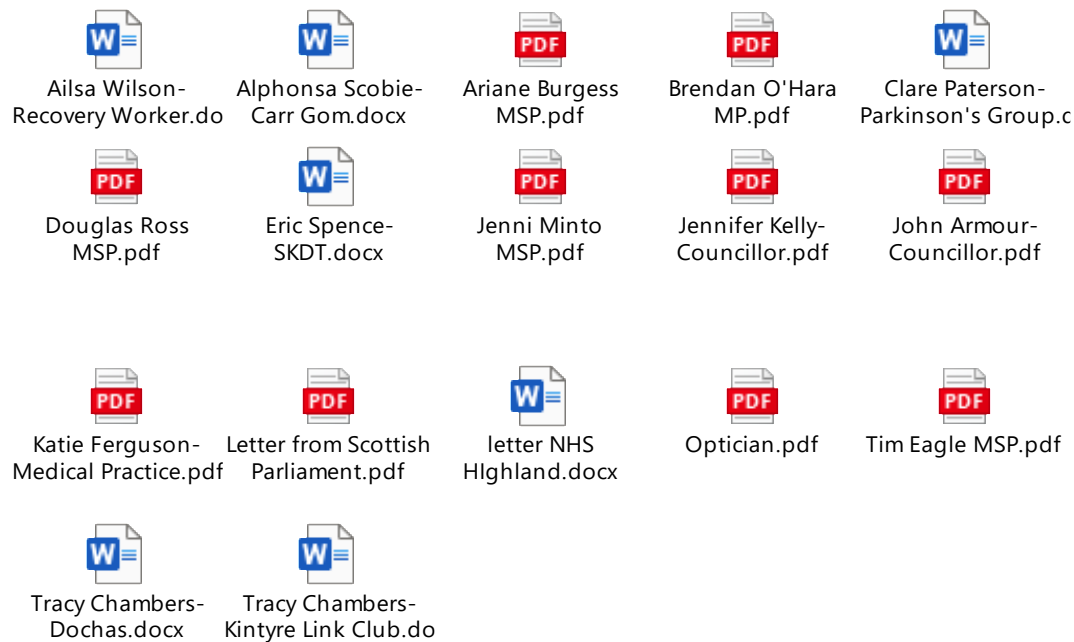


Free text to  
questions within the

## Appendix 5 - Letters to Interested Parties



## Appendix 6 – Letters of Support



## Appendix 6a – Replies (the template below was sent to all of the above as an acknowledgement)



Signed : .....  
Ali Kazim, Applicant

Signed : .....  
Fiona Clark, NHS Highland

Date :

Date : 23<sup>rd</sup> August, 2024