



Appendix 12

Consultation Report

Regulations

NHS (Pharmaceutical & LPS) Regulations 2013 require a 60-day consultation as part of the statutory duty around production of a PNA.

Extract from NHS (Pharmaceutical & LPS) Regulations 2013 No 349: PART 2: Reg 8:

8. (1) When making an assessment for the purposes of publishing a pharmaceutical needs assessment, each HWB (HWB1) must consult the following about the contents of the assessment it is making.

The persons mentioned below “must together be consulted at least once during the process of making the assessment on a draft of the proposed pharmaceutical needs assessment”.

*The consultation should be for a minimum period of **60** days, beginning with the day that all parties are served the draft. A person is to be treated as served with a draft, if that person is notified by the HWB of the address of a website on which the draft is available and is to remain available (except due to accident or unforeseen circumstances) throughout the period for making responses to the consultation.*

Those served with the draft can request a copy of the draft in hard copy form, the HWB must as soon as is practicable and in any event within 14 days supply a hard copy of the draft to that person (free of charge).

Consultation period

The statutory consultation period for the Herefordshire PNA ran from **04th July to 02nd September 2025**.

Consultees

The regulations state that the following organisations must be consulted:

- The local pharmaceutical committee
- The local medical committee
- Pharmacy and dispensing appliance contractors included in the pharmaceutical list for the area of the health and wellbeing board
- Dispensing doctors included in the dispensing doctor list for the area of the health and wellbeing board

- Any pharmacy contractor that holds a local pharmaceutical services contract with premises that are in the health and wellbeing board's area,
- Healthwatch, and any other patient, consumer, or community group in the area which the health and wellbeing board believes has an interest in the provision of pharmaceutical services
- Any NHS trust or NHS foundation trust in the health and wellbeing board's area
- NHS England and NHS Improvement
- Any neighbouring health and wellbeing board

The following organisations, and contacts therein, were notified via email on 04th July. The email contained an invitation letter and a link to the webpage on the Herefordshire Council website with PDF copies of the full draft PNA report, appendices and link for survey comments/ feedback.

Herefordshire Local Pharmaceutical Committee (LPC)
Herefordshire Local Medical Committee (LMC)
Herefordshire Pharmacies
Herefordshire Dispensing GP Practices (Practice Managers)
Healthwatch Herefordshire
Wye Valley Trust
HWICB
NHSE West Midlands Region
Office for the West Midlands (OWM)
Neighbouring LPCs (Gloucester and Shropshire)
Neighbouring HWBs and DPHs (Gloucester, Shropshire and Worcestershire)
PNA Working Group Members

Invite Letter

Dear Consultee,

You have been identified as a recommended consultee for the Herefordshire Pharmaceutical Needs Assessment (PNA) 2025.

Consultation on the Herefordshire Council Pharmaceutical Needs Assessment

The Health and Wellbeing Board of Herefordshire Council have produced a draft local PNA. This will help ensure residents have good access to local pharmacy services. The last PNA was published in 2022 and this PNA is due to be published on 01 October 2025.

This PNA provides an assessment of the current provision of pharmaceutical services across Herefordshire and whether this meets the needs of the population, or if there are any potential gaps. Additionally, recommendations for where and how services may be improved. The PNA will be used by the Herefordshire and Worcestershire Integrated Care Board (HWICB), to consider applications to open new pharmacies, or to commission additional services from pharmacies. Local commissioners may also use information and evidence contained within the PNA to commission additional services from community pharmacies.

How to comment on the draft PNA

Nominated Consultees are kindly requested to comment on the contents of the draft PNA before it is finalised and published. We would like to invite you to take part in this consultation which will run from 04th July until 02nd September 2025.

The draft PNA, further information and a link to the online feedback form can be found on the following website: <https://www.herefordshire.gov.uk/pna>

To limit the environmental impact of this consultation we would prefer that the document is read electronically. However, if you do require a paper copy of the form or have any queries, please contact **(emails redacted)**

All feedback will be considered, and a consultation report will be included within the final PNA (due to be published by 1st October 2025). This will give an overview of the feedback received and set out how this has impacted the final document. We look forward to receiving your feedback on the draft PNA.

Zoe Clifford
Director of Public Health
Herefordshire Council

Survey

The online consultation survey asked the following questions:

Herefordshire PNA 2025 Survey for Consultees	
Name (optional):	
Email (optional):	
Q1. Please indicate from the list below which type of consultee category best describes you.	A member of the local pharmaceutical committee (LPC) A member of the local medical committee (LMC) A Pharmacy or dispensing appliance contractors in Herefordshire A Dispensing Doctors or from a Dispensing GP Practice in Herefordshire. A Pharmacy Contractor in Herefordshire A member of Healthwatch Herefordshire A member of another patient, consumer, or community group in Herefordshire. A member of an NHS trust or NHS foundation trust in Herefordshire A member for NHS England or NHS Improvement A member of a neighbouring health and wellbeing board An interested member of the public Other

Other, please specify:	
Q2. Please add your comments regarding any potential errors.	
Q3. Please add your comments relating to the Gap Analysis	
Q4. Please add your comments relating to the mapping analysis.	
Q5. Please add your comments relating to the engagement analysis.	
Q6. Please add your comments relating to the local need analysis.	
Q7. Please add your comments relating to the conclusions drawn from this PNA (including the regulatory statements).	
Q8. Please add your comments relating to the Recommendations.	
Q9. Please give any comments relating to the PNA overall, or where these do not fit with any previous question.	
Thank you for taking the time to complete this survey	

Consultation Log

A total of 4 responses were received over the consultation period. The responders and comments are in the table below.

Response Number & Responder Category	Consultation Response	Consideration given in revised draft	Decision to amend the PNA (y/n) and date
1 A member of the local pharmaceutical committee (LPC)	Q2 N/A Q3 Seems OK - not sure about sharps 'success' in Worcestershire Q4 Good Q5 Good Q6 Good Q7 Agreed Q8 Agreed apart from sharps. Note OC and BP provision is linked with PhF and so has increased since June.	N/A	N/A

2 On behalf of a national pharmacy contractor	Nil	N/A	N/A
3 A Dispensing Doctors or from a Dispensing GP Practice in Herefordshire.	Q2 Nil errors noted Q3 I agree with the no gap statement Q4 Nil Q5 Nil Q6 Nil Q7 I would like to know who the named person is signing the PGD for pharmacy commissioned pharmacy first services. Q8 I would express a concern of depression being added to the new medicines service given it's a high-risk area Q9 Generally positive report, I would just note the comments above	N/A Query referred	N/A
4 Member of Herefordshire Health and Wellbeing Board	Q2 Noticed a couple of typos - enhances instead of enhanced for example. Q3 Nil Q4 Nil Q5 Nil Q6 Nil Q7 Conclusions seem logical based on the needs analysis Q8 Are the 13 recommendations from 2025, on top of the 2022 ones? it is not clear how many of the 2022 recommendations are actually completed. The progress updates are in some instances a bit woolly. The 2025 recommendations could do with being SMARTer. Q9 An executive summary and/or easy read version would be helpful.	A further proofread and typo amendments made on pages SMART recommendations covered by action matrix Executive Summary given as HWB Report	Yes 12/09/2025