

Appendix K – consultation report

1 Introduction

As part of the pharmaceutical needs assessment process the health board is required to undertake a consultation of at least 60 days with certain organisations. The purpose of the consultation is to establish if the pharmaceutical providers and services supporting the population of the health board's area are accurately reflected in the final pharmaceutical needs assessment document. This report outlines the considerations and responses to the consultation and describes the overall process of how the consultation was undertaken.

2 Consultation process

To complete this process the health board has consulted with those parties identified under regulation 7 of the NHS (Pharmaceutical Services) (Wales) Regulations 2020, to establish if the draft pharmaceutical needs assessment addresses issues that they considered relevant to the provision of pharmaceutical services:

- Community Pharmacy Wales
- Morgannwg Local Medical Committee
- Contractors included in the pharmaceutical list
- GPs included in the dispensing doctor list
- GP practices
- Llais
- West Glamorgan Regional Partnership Board
- Swansea Council
- Neath Port Talbot Council
- Cwm Taf Morgannwg University Health Board
- Hywel Dda University Health Board
- Powys Teaching Health Board.

A covering email together with a letter from Craige Wilson, primary community therapies director regarding the consultation period was sent to the above organisations, inviting them to submit their views on the pharmaceutical needs assessment. Weblinks to the pharmaceutical needs assessment and questionnaire were included in the email.

Consultees were given the opportunity to respond by completing a set of questions and/or submitting additional comments. All documents were bilingual, although no responses were received in Welsh.

The questions derived were to assess the current provision of pharmaceutical services, have regard to any specified future circumstance where the current position may materially change and identify any current and future gaps in pharmaceutical services.

The consultation ran from 13 July to 11 September 2026.

This report outlines the considerations and responses to the consultation. One response from a contractor was received to the online questionnaire, and one off-system response was received from Community Pharmacy Wales.

3 Summary of online questions, responses and the health board's considerations

Question 1 - Has the purpose of the pharmaceutical needs assessment been explained?

The health board is pleased to note that the contractor replied "Yes".

Community Pharmacy Wales replied as follows.

"The draft PNA provides a useful explanation of the relationship between the PNA, population health needs and the provision of pharmaceutical services. It also appropriately recognises the role of the PNA in informing market entry decisions, including applications to join the pharmaceutical list or dispensing doctor list. CPW would, however, welcome clearer emphasis within the Introduction on the significance of this statutory function. In particular, the PNA forms part of the evidential basis against which applications to join a pharmaceutical list or dispensing doctor list, together with certain relocation and core-hours applications, are assessed under the NHS (Pharmaceutical Services) (Wales) Regulations 2020. Clear acknowledgement of this role is important, as the conclusions reached within the PNA may have a direct bearing on future market entry decisions. It is therefore essential that the evidence base, assessment methodology and resulting conclusions are sufficiently clear, comprehensive and robust to withstand scrutiny and support sound decision-making."

The health board is pleased to note that no concerns have been raised regarding the explanation of the purpose of the document. Section 1.1 has been amended in response to the comment from Community Pharmacy Wales regarding the role of the pharmaceutical needs assessment in determining applications for inclusion in the health board's pharmaceutical and dispensing doctor lists.

Question 2 - Does the draft pharmaceutical needs assessment reflect the current provision of pharmaceutical services within the Swansea Bay University Health Board area?

The health board is pleased to note that the contractor replied "Yes".

Community Pharmacy Wales replied as follows.

"The draft PNA provides a broadly accurate reflection of current community pharmacy provision across the Swansea Bay University Health Board area. It draws upon an appropriate range of evidence, including contractual data, dispensing and service activity data, local Health Board intelligence and self-declared pharmacy contractor questionnaire returns. Taken together, these sources provide a reasonable high-level assessment of existing provision across the local community pharmacy network."

The pharmacy contractor questionnaire provides a useful insight into current service provision and operating conditions within parts of the network. However, the reported capacity should be regarded as a point-in-time assessment rather than a definitive indication of future resilience. The continued provision of pharmaceutical services remains intrinsically linked to the level of funding available through the community pharmacy contractual framework, which has a direct bearing on contractor capacity, workforce sustainability and the ability to maintain service delivery. In the absence of significant additional investment, there is a material risk that the level of provision described within the PNA will not be sustainable over the lifetime of the assessment.”

The health board is pleased to note that the pharmaceutical needs assessment reflects the current provision of pharmaceutical services across its area. It has noted that the responses from contractors in relation to their ability to manage an increase in demand is a point-in-time assessment and can confirm they have been treated accordingly in the document. It acknowledges the link between the level of funding available and contractor capacity, workforce sustainability, and the ability of contractors to maintain service delivery, and will keep this under review.

Question 3 - Are there any pharmaceutical services currently provided in Swansea Bay University Health Board’s area that have not been highlighted within the draft pharmaceutical needs assessment?

The health board is pleased to note that the contractor replied “No”.

Community Pharmacy Wales replied as follows.

“Swansea Bay University Health Board has identified, for the purposes of the PNA, much of the relevant information relating to when pharmaceutical services are available, where they are provided, and which services are offered by community pharmacies, appliance contractors and dispensing doctors. This assessment appears to have been informed by data drawn from a range of available sources, including information relating to opening hours, premises locations and service provision. CPW is not in a position to independently verify the completeness or accuracy of all information relied upon in the assessment.”

The health board is pleased to note that no pharmaceutical services have been missed.

Question 4 - Does the draft pharmaceutical needs assessment reflect the needs of the Swansea Bay University Health Board area’s population?

The health board is pleased to note that the contractor replied “Yes”.

Community Pharmacy Wales replied as follows.

“CPW recognises the considerable work undertaken by the Health Board in assessing and setting out population health needs. Based on the information provided, CPW is satisfied that these needs are appropriately reflected in the PNA and that the document demonstrates that the population’s pharmaceutical needs are

currently being met by the existing community pharmacy network across the Swansea Bay University Health Board area.”

The health board is pleased to note that the pharmaceutical needs assessment reflects the needs of its population.

Question 5 - Has the draft pharmaceutical needs assessment provided information to support decisions ie decisions on applications for new pharmacies, relocations and range of services?

The health board is pleased to note that the contractor replied “Yes”.

Community Pharmacy Wales replied as follows.

“The assessment does not identify any current or future gaps in pharmaceutical service provision that would indicate a need for additional pharmaceutical premises, dispensing appliance contractor services or dispensing doctor services. Consequently, the PNA does not give rise to any new market entry opportunities during its lifetime.”

The health board is pleased to note that the pharmaceutical needs assessment will support the determination of any applications for inclusion in the pharmaceutical or dispensing doctor lists that may be received.

Question 6 - Are there any gaps or issues in pharmaceutical provision in the Swansea Bay University Health Board’s area that have not been reflected in the draft pharmaceutical needs assessment?

The health board is pleased to note that the contractor replied “No”.

Community Pharmacy Wales replied as follows.

“The PNA’s purpose is to assess how pharmaceutical services can meet the health needs of the Health Board’s population over a period of up to five years. The draft PNA fulfils this purpose, and the framework does not require it to assess need beyond that period.”

The health board is pleased to note that no gaps or issues in the provision of services have been identified by the respondents.

Question 7 - Has the draft pharmaceutical needs assessment provided enough information to inform future pharmaceutical services provision and plans for pharmacies?

The health board is pleased to note that the contractor replied “Yes”.

Community Pharmacy Wales replied as follows.

“The draft Pharmaceutical Needs Assessment provides a reasonable level of information to inform future pharmaceutical service provision and planning. It has

considered pharmacy contractors' ability to increase capacity in response to rising demand, drawing on evidence from the contractor questionnaire, and has also taken account of wider factors such as planned housing developments and anticipated population changes. This helps to build a forward-looking picture of potential service need.

However, the conclusions regarding capacity should be viewed in the context of the current financial pressures facing the sector. Any suggestion of available or scalable capacity is heavily dependent on the availability of sustainable funding and an adequate workforce. In practice, there is clear evidence across the network that financial pressures are affecting service delivery. For some contractors, ongoing funding constraints are now affecting viability, with a small but growing number reaching a point where the sustainability of their businesses is in question. As such, while the PNA provides a useful evidence base for planning, the extent to which any identified capacity can be realised will depend on meaningful and sustained investment alongside contractual support. CPW would welcome the Health Board's support in recognising that the assumptions underpinning the PNA's conclusions depend on sustainable recurrent funding and sufficient workforce capacity."

The health board has responded to these points above.

Question 8 - Are there any pharmaceutical services that could be provided in the community pharmacy setting that have not been highlighted?

The contractor replied "No".

Community Pharmacy Wales replied as follows.

"Chapter 3 identifies a number of significant health needs within the Swansea Bay University Health Board population that could potentially be addressed through community pharmacy additional clinical services. For example, Section 3.2.2.2 highlights the growing prevalence of obesity among adults in Wales, an area where pharmacy-based weight management services could make a meaningful contribution.

However, the delivery of services such as weight management and other clinically focused interventions **would require significant additional investment beyond the current Community Pharmacy Contractual Framework (CPCF)**. It is suggested that the Health Board considers these identified health needs in greater detail, develops services in line with Community Pharmacy by Design principles, and secures appropriate recurrent funding to support their sustainable delivery through the community pharmacy network"

The health board has noted the response from Community Pharmacy Wales and can confirm that pharmacy contractors would be considered as a provider of clinically appropriate services that are developed as part of Community by Design. It recognises the need to ensure that future services commissioned from pharmacy contractors are appropriately remunerated.

Question 9 – Do you agree with the conclusions of the pharmaceutical needs assessment?

The health board is pleased to note that the contractor replied “Yes”.

Community Pharmacy Wales replied as follows.

“CPW is content with the conclusion that the assessment does not identify any current or future needs relating to the provision of pharmaceutical services in Swansea Bay University Health Board.”

The health board is pleased to note that no concerns have been identified in relation to the conclusions of the document.

Question 10 – Do you have any other comments on the draft pharmaceutical needs assessment?

The contractor replied “No”.

Community Pharmacy Wales replied as follows.

“CPW is concerned that the PNA does not provide sufficient information regarding controlled localities.

There are two dispensing practices located within the Health Board’s area and consequently patients receiving dispensing doctor services. The PNA acknowledges that dispensing doctor provision depends upon patients residing within controlled localities and practices holding the relevant consent and premises approvals. However, it does not identify current controlled locality determinations, dispensing doctor outline consent areas, or provide controlled locality maps (or signposting to them).

Further to correspondence earlier in 2026 requesting information and maps relating to controlled locality determinations, CPW notes the Health Board’s confirmation that it will not publish controlled locality maps as part of, or alongside, its October 2026 Pharmaceutical Needs Assessment. The Health Board’s position is that, while the Regulations require controlled locality maps to be defined and retained for inspection, there is no statutory requirement for them to be included in the PNA or otherwise published.

Whilst it is recognised that there is no statutory requirement, CPW draws the Health Board’s attention to the Welsh Government’s non-statutory guidance accompanying the NHS (Pharmaceutical Services) (Wales) Regulations 2020, which states that PNAs should include information on dispensing doctor outline consent areas and suggests that controlled locality maps, or links to those maps, should be provided. The guidance also highlights the importance of maintaining accurate controlled locality boundaries, particularly where development or changing settlement patterns may affect previous determinations.

Without controlled locality maps, there is no assurance that patients currently receiving pharmaceutical services from dispensing doctors reside within properly determined controlled localities. CPW therefore strongly suggests that an examination of the controlled locality boundaries is undertaken.”

The health board acknowledges that regulation 61 of the NHS (Pharmaceutical Services) (Wales) Regulations 2020 requires it to publish in such manner as it sees fit and make available for inspection at its offices a copy of a map delineating the boundaries of any controlled localities that have been determined. However, there is no statutory requirement for the map to be published within the pharmaceutical needs assessment. The health board is satisfied that the pharmaceutical needs assessment therefore meets the relevant statutory requirements.

The health board has discussed the matter with the other health boards in Wales. A consistent approach has been agreed, with the health boards taking the same position that controlled locality maps will not be published as part of, or alongside, the pharmaceutical needs assessments.

Question 11 - Do you have any other comments you wish to make on pharmaceutical services in Swansea Bay University Health Board?

The contractor and Community Pharmacy Wales both replied “No”.

Community Pharmacy concluded its response by saying the following.

“In conclusion, CPW welcomes the opportunity to comment on the draft Pharmaceutical Needs Assessment and recognises the significant work undertaken by Swansea Bay University Health Board. Overall, CPW is satisfied that the draft PNA provides a reasonable assessment of current pharmaceutical service provision and does not identify any current or future unmet need requiring additional pharmaceutical services. However, CPW would welcome further clarity on controlled localities and emphasises that the continued sustainability of community pharmacy services will depend on adequate recurrent funding and workforce capacity.”

The health board is pleased to note no other comments have been made.

4 Summary conclusions

The health board is pleased to note that the overall response to the consultation has been positive. No concerns have been raised regarding non-compliance with the regulatory requirements, no pharmaceutical services provision has been missed, and the conclusions are agreed with.

5 Amendments

One amendment has been made to the pharmaceutical needs assessment in response to the consultation.

- “If an applicant’s purported need is not included in the pharmaceutical needs assessment, then the application must be refused” has been added to the end of section 1.1.