

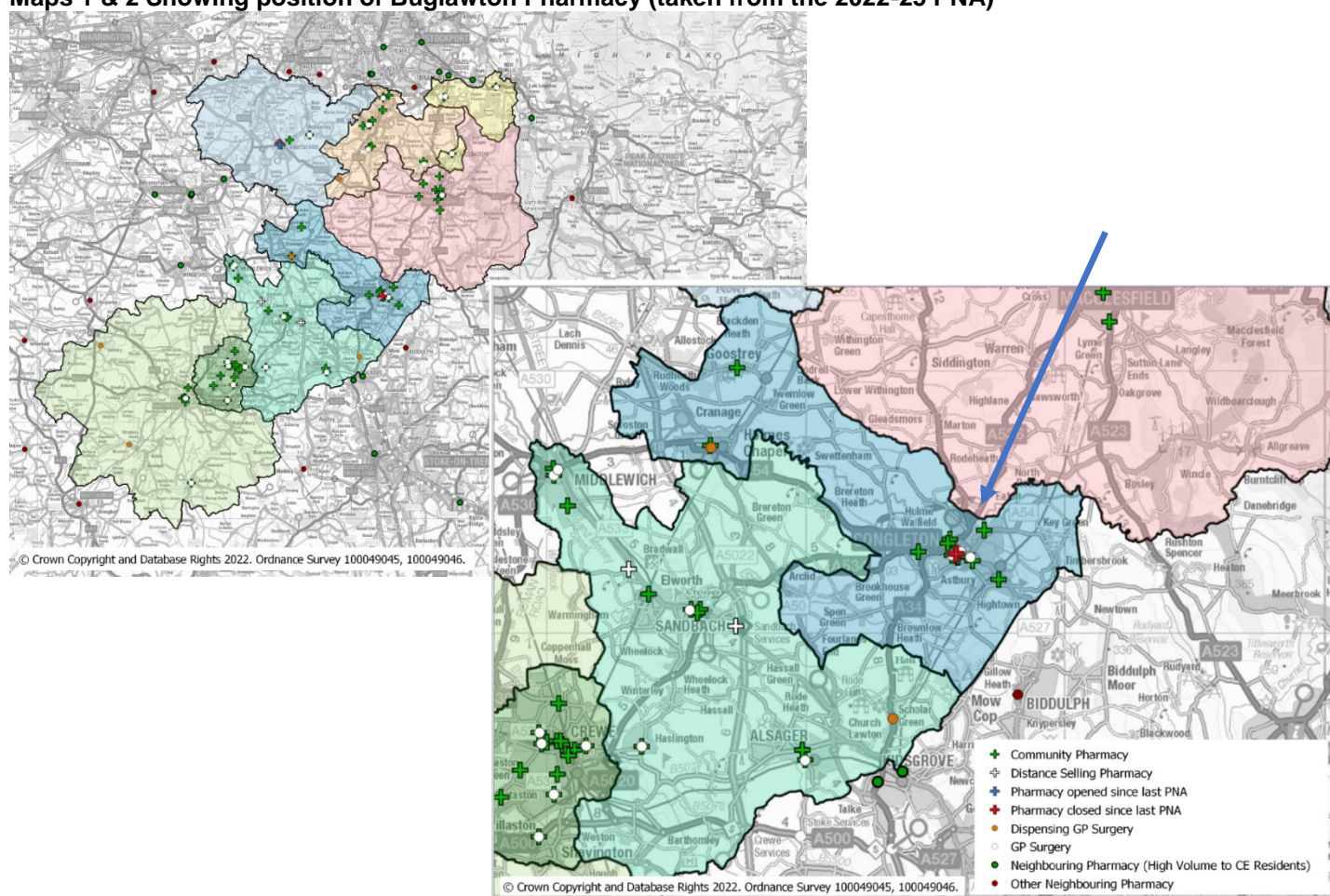
Appendix A - The impact of the closure of Congleton Pharmacy, Buglawton (Gap analysis)

Current need

Congleton Pharmacy, 62b Havannah Street, CW12 2AT (FHA56) is situated in the village of Buglawton, north-east of Congleton town centre. Buglawton sits within the ward of Congleton East, part of Congleton, Holmes Chapel (CHOC) care community. CHOC care community forms a band across the middle of Cheshire East, shaded turquoise on the map below. It is bordered by Macclesfield care community to the north and SMASH care community to the south.

The latest Pharmaceutical Needs Assessment (PNA) concluded that there was an adequate level of community pharmacy provision within Congleton and Holmes Chapel. The maps show that this provision is mostly located either in the town centre or close to GP surgeries (see map 2). There are bordering pharmacies accessible for residents in the neighbouring care community of SMASH and outside the Cheshire East border in Biddulph, Staffordshire.

Maps 1 & 2 Showing position of Buglawton Pharmacy (taken from the 2022-25 PNA)



Cheshire East's PNA published in October 2022, identified 12 community pharmacies which fell within the CHOC care community boundary: nine in Congleton town, one in Buglawton, one in Goostrey and another one in Holmes Chapel.

Within the 2022-23 the pharmacy is recorded as Salus Pharmacy (FEP14).

There are four GP Practices within the care community: -

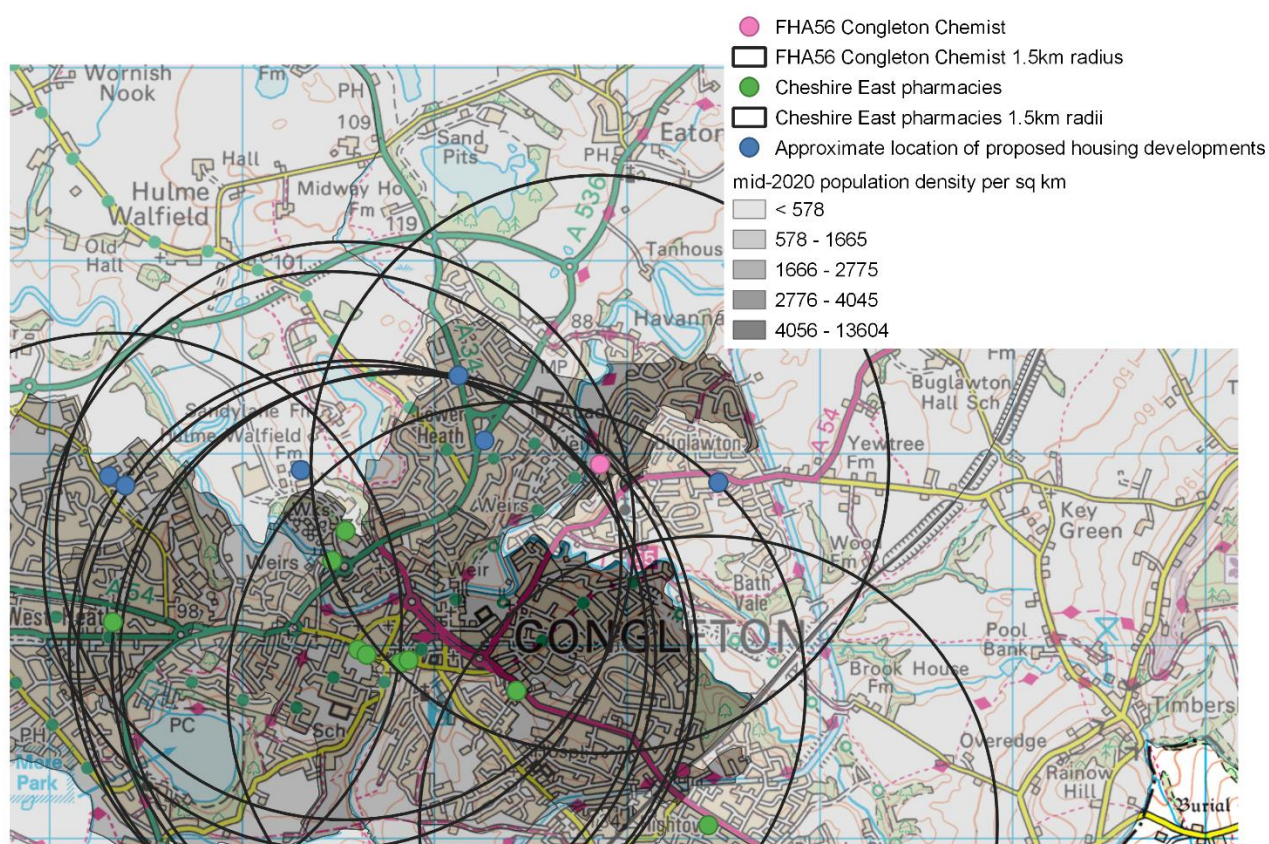
- N81052 - Lawton House Surgery (Congleton East)
- N81118 - Meadowside Medical Centre (Congleton West)
- N81027 - Readesmoor Medical Group Practice (Congleton West)
- N81077 - The Health Centre, Holmes Chapel (Dane Valley)

CHOC care community rural residents are catered for by:

The Holmes Chapel Health Centre is a dispensing GP practice. [\(PNA 2022-2025 Chapter 10\)](#)

The pharmacy in Goostrey receives additional funding as part of the Pharmacy Access Scheme (PhAS). These payments bridge the funding reduction announced by the Department of Health to mitigate the risk of the rural pharmacies closing.

Map 3: Location of Buglawton pharmacy and neighbouring pharmacies with proposed housing developments and 1.5km radii



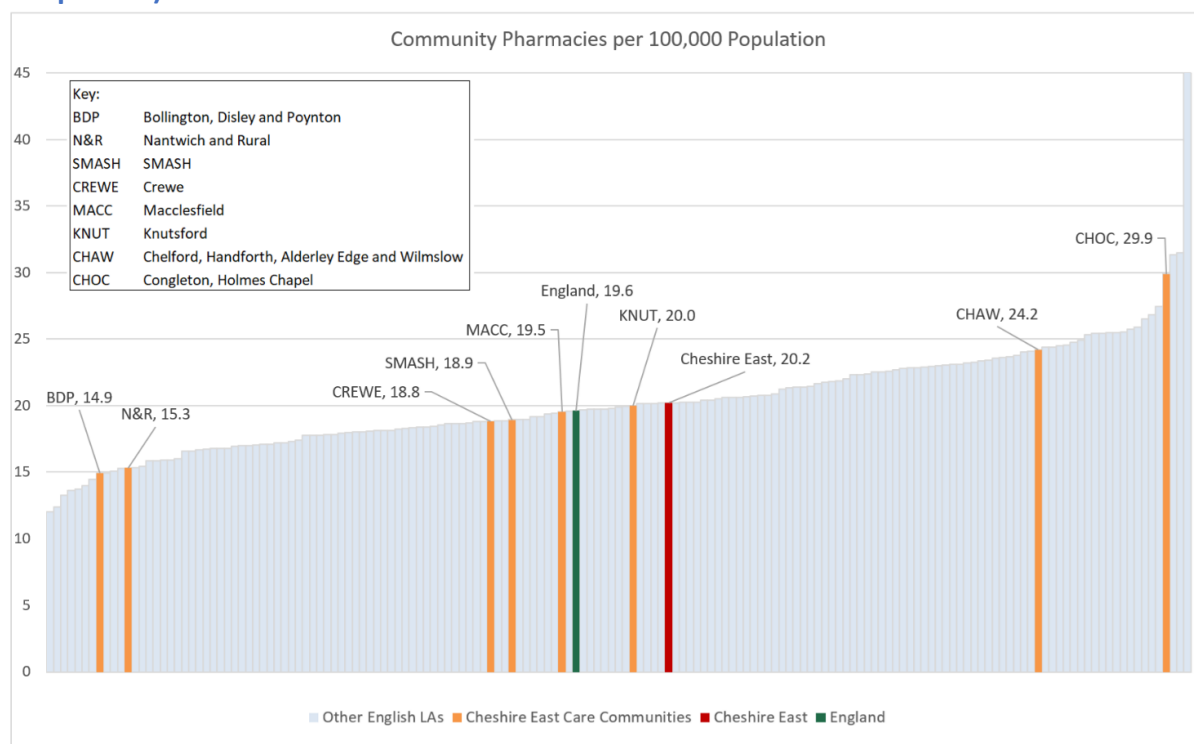
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Factors Affecting Prescribing

The PNA identified factors that affect prescribing rates and patterns ([PNA 2022-2025 Chapter 14](#)). Some of these factors relate to the development of medicines and other health and wellbeing services, new policy or changes to existing policy, guidance, and evidence; while others relate to the size and age structure of the populations, levels of deprivation, provision of community pharmacies, accessibility and opening times, or prevalence of long-term conditions e.g. diabetes. This latter group are the factors that will be impacted by the closure of a pharmacy, and it is those that we will explore within this report.

In 2021 there were 19.6 pharmacies per 100,000 in England. Cheshire East's rate of 20.2 per 100,000 was above the England average. CHOC's rate was the highest within Cheshire East at 29.9 per 100,000 and fell within the top national quintile.

Figure 2: Pharmacies per 100,000 population in Care Communities, November 2021 (PNA 2022-25 Chapter 11)



Data Source: National Pharmacy tables as at Nov 2021, ONS Population estimates: Persons by single year of age and sex for local authorities in the UK, mid-2020

Even with the closure of the pharmacy in Buglawton, there will be **11 active pharmacies within the care community boundary**. Factoring in the increase in population identified by the 2021 Census, **the rate for CHOC remains the highest in Cheshire East at 25.7 per 100,000**.

Implications for essential provision

Within the latest PNA, the current dispensing workload, as demonstrated by the number of items dispensed per pharmacy, for Cheshire East was similar to the England average. The majority of prescriptions issued by GPs in each care community are dispensed by community pharmacies in that area.

Table 7: Average items per month prescribed by Cheshire East Care Communities during 2020/21 (PNA 2022-25 Chapter 11)

Location of Dispenser	Prescribed in Cheshire East 2020/21	No. of Pharmacies	Average Items per Month	Average Monthly Items per Pharmacy*
Alderley Edge, Chelford, Handforth, Wilmslow	675,971	11	56,331	4,941
Macclesfield	1,397,923	12	116,494	8,471
Bollington, Disley, Poynton	387,419	4	32,285	7,432
Knutsford	389,000	5	32,417	4,303
Congleton, Holmes Chapel	857,675	12	71,473	5,207
Nantwich and Rural	518,239	6	43,187	6,593
Crewe	1,438,876	15	119,906	6,613
SMASH	1132,671	13	94,389	7,356
Cheshire East	6,797,774	78	566,481	6,568
England		11,636	84,730,754	6,565

93.7% of prescriptions in Congleton, Holmes Chapel care community were dispensed within Congleton, Holmes Chapel care community, the highest proportion prescribed and dispensed within a single care community. 1.1% were dispensed in Macclesfield, and 4.4% were dispensed outside Cheshire East. During the financial year 2020/21, Congleton Pharmacy dispensed 37,800 items, less than 1% of the items prescribed within Cheshire East, an average of 3152 per month. **Most items dispensed (98%) are prescribed by local GP Practices i.e., within CHOC Primary Care Network (PCN).** With the loss of the Congleton Pharmacy, the dispensing workload will redistribute to the remaining pharmacies, each pharmacy within CHOC care community will need to dispense an additional 287 items per month. **The average number of items dispensed per pharmacy increases to 6,498, still below the England average.** ([PNA 2022-25 Chapter 11](#))

Residents who are finding it difficult to access their local pharmacy and/or have mobility or transport issues, may be able to request that their prescription is delivered by the pharmacy or posted to them. Many local pharmacies offer delivery services for residents who meet certain criteria, although there may be a charge for this. Distance Selling Pharmacies (also known as internet pharmacies) provide services without face-to-face contact and will deliver by post / courier services. Residents can nominate any pharmacy to process their prescriptions, not just the one in their neighbourhood ([PNA 2022-2025 Chapter 13](#)). Using the NHS App or a similar online service or app can make the process of ordering repeat prescriptions simple and convenient.

Non-NHS funded services	Current provision	
	Number of pharmacies	Percentage
Collection of prescriptions from surgeries	11	100.0%
Free delivery of dispensed medicines	6	54.5%
Chargeable delivery of dispensed medicines	3	27.3%
No delivery services	2	18.2%

Data Source: Pharmacy Contractors Survey 2021

All remaining pharmacies offer collection from GP surgeries and 82% deliver dispensed medicines.

The views of the pharmaceutical contractors within Cheshire East were captured via an electronic community pharmacy survey made available on PharmOutcomes, a clinical service platform for community pharmacies, during September 2021. The survey was developed in conjunction with the other Health and Wellbeing Board areas in Cheshire and Merseyside. It included questions regarding premises, additional services offered and provision for people with protected characteristics.

When asked about managing increased demand, of the 11 remaining pharmacies in CHOC care community; 9 stated “We have sufficient capacity within our existing premises and staffing levels to manage an increase in demand in our area” and 2 stated “We don't have sufficient premises and staffing capacity at present but could make adjustments to manage an increase in demand in our area”.

There remains **good coverage of pharmacy provision opening hours** across the care community, with extended opening hours from 6.30am and throughout the day up to midnight. There will still two 100-hour pharmacies in Congleton. ([PNA 2022-2025 Chapter 12](#))

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	100 Hrs
Boots Pharmacy, 14-16 Bridge Street, Congleton, CW12 1AY	09:00 - 17:30	09:00 - 17:30	09:00 - 17:30	09:00 - 17:30	09:00 - 17:30	09:00 - 17:30		No
Salus Pharmacy, 62b Havannah Street, Buglawton, Congleton, CW12 2AT	09:00 - 18:00	09:00 - 18:00	09:00 - 18:00	09:00 - 18:00	09:00 - 18:00	09:00 - 13:00		No
Boots Pharmacy, Unit E Retail Park, Barn Road, Congleton, CW12 1LJ	08:00 - 23:59	08:00 - 23:59	08:00 - 23:59	08:00 - 23:59	08:00 - 23:59	08:00 - 22:00	10:00 - 16:00	Yes
Lloyds Pharmacy, 41a West Street, Congleton, CW12 1JN	08:30 - 18:15	08:30 - 18:15	08:30 - 18:15	08:30 - 18:15	08:30 - 18:15	09:00 - 13:00		No
Well Pharmacy, 1 Park Lane, Congleton, CW12 3DN	08:45 - 18:30	08:45 - 18:30	08:45 - 18:30	08:45 - 18:30	08:45 - 18:30			No
Superdrug Pharmacy, 39-41 High Street, Congleton, CW12 1AU	09:00 - 17:30	09:00 - 17:30	09:00 - 17:30	09:00 - 17:30	09:00 - 17:30	09:00 - 17:30		No
Mossley Pharmacy, 18 Biddulph Road, Mossley, Congleton, CW12 3LG	09:00 - 13:00, 14:00 - 18:00	09:00 - 13:00, 14:00 - 18:00	09:00 - 13:00, 14:00 - 18:00	09:00 - 13:00, 14:00 - 18:00	09:00 - 13:00, 14:00 - 18:00			No
Lloyds Pharmacy, Holmes Chapel Health Centre, 39-41 London Road, Holmes Chapel, CW4 7AP	08:30 - 19:00	08:30 - 19:00	08:30 - 19:00	08:30 - 19:00	08:30 - 19:00	08:30 - 17:00		No
West Heath Pharmacy, Unit 3, West Heath Shopping Pct., Holmes Chapel Road, Congleton, CW12 4NB	09:00 - 17:30	09:00 - 17:30	09:00 - 17:30	09:00 - 17:30	09:00 - 17:30	09:00 - 13:00		No
Tesco Pharmacy, Barn Road, Congleton, CW12 1LR	06:30 - 22:30	06:30 - 22:30	06:30 - 22:30	06:30 - 22:30	06:30 - 22:30	08:00 - 22:00	10:00 - 16:00	Yes
Goostrey Pharmacy, No 3 Cheshire House, 164 Main Road, Goostrey, CW4 8JP	09:00 - 17:30	09:00 - 17:30	09:00 - 17:30	09:00 - 17:30	09:00 - 17:30			No
Day Lewis Pharmacy, 29-31 West Street, Congleton, CW12 1JP	08:00 - 18:30	08:00 - 18:30	08:00 - 20:00	08:00 - 20:00	08:00 - 18:30			No

Implications for Commissioned Services

Congleton Pharmacy only offered one public health commissioned service, Needle Exchange. This service is also offered by Well Pharmacy, 1 Park Lane, Congleton.

In terms of advanced services, it was only commissioned for appliances – dressings only; this service is offered by 9 other pharmacies within the CHOC Care Community. The New Medicines Service is offered by all pharmacies.

Congleton Pharmacy was not commissioned to deliver the COVID-19 Vaccination Service

Implications for managing long term conditions.

CHOC care community is made-up of three wards: Congleton East, Congleton West and Dane Valley. Congleton Pharmacy is located within Congleton East. According to the tartan rug, the CHOC care community has a mixed picture, with Congleton East falling in the worst 40% of wards nationally for income deprivation and Dane Valley falling in the best 10%. However, the health and wellbeing of the area does not follow a typical pattern, with Congleton East faring better than expected in terms of mortality, lifestyle, and wellbeing measures within the Tartan rug. ([Tartan Rug 2022 \(cheshireeast.gov.uk\)](https://www.cheshireeast.gov.uk/tartan-rug-2022))

Congleton East has significantly higher rates of emergency hospital admissions due to falls in older people and hip fractures in people aged 80 years and older, and it is important to consider causes of falls. Medication reviews are an important part of falls risk assessment and falls prevention.

The PNA has focused on commonly occurring chronic conditions that are managed in the community by GPs and supported by community pharmacies. The data used was based on GP registered population for each practice in the 2020/21 financial year from QOF (Quality and Outcomes Framework sourced by NHS Digital from GP Registers). Each practice postcode is then mapped to their respective care community to obtain prevalence. The table below illustrates the burden of disease across CHOC care community and Lawton House Surgery which sits within Congleton East ward.

Disease		Lawton House Surgery, Congleton East		Congleton, Holmes Chapel		Cheshire East	England
		Number	Proportion (%)	Number	Proportion (%)	Proportion (%)	Proportion (%)
Respiratory Condition	Asthma	780	7.2%	3,087	7.1%	6.8%	6.4%
	COPD	237	2.0%	798	1.7%	1.9%	1.6%
Circulatory Conditions	Atrial Fibrillation	297	2.6%	1,401	3.0%	2.7%	2.1%
	Coronary Heart Disease	367	3.2%	1,618	3.5%	3.4%	3.1%
	Chronic Kidney Disease	502	5.4%	2,068	5.5%	4.6%	4.0%
	Diabetes Mellitus	717	7.7%	2,730	7.2%	6.6%	7.1%
	Non diabetic Hyper-glycaemia	583	6.3%	2,540	6.8%	6.0%	5.3%
	Heart Failure	67	0.6%	674	1.5%	1.2%	0.9%
	Hypertension	1871	16.2%	7,470	16.1%	15.6%	13.9%
	Stroke/TIA Heart Disease	241	2.1%	1,157	2.5%	2.3%	1.8%
Mental Health	Depression	1,054	11.4%	5,093	13.6%	14.1%	12.3%
	Mental Health	118	1.0%	379	0.8%	12.3%	1.0%
Other	Epilepsy	81	0.9%	336	0.9%	0.9%	0.8%
	Palliative Care	115	1.0%	363	0.8%	0.8%	0.5%

Regular screening and dispensing of controlled medication across pharmacies is vital to help manage many long-term conditions. It can prevent conditions worsening, prevent or reduce the numbers of admissions and visits to GP Practices. A high QOF disease prevalence rate may indicate poor health or equally may indicate good levels of case-finding.

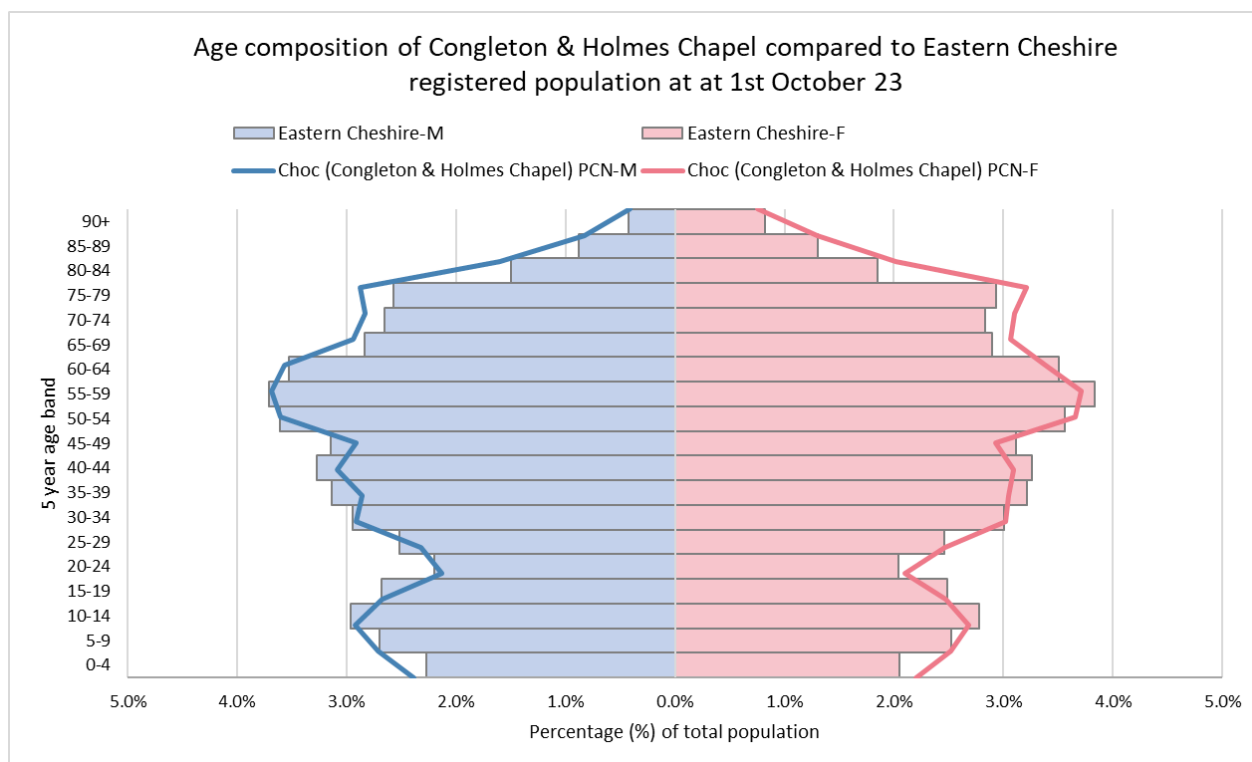
Circulatory Conditions

In 2021, there were 7,470 patients with hypertension, 2,730 with diabetes, 2,068 with chronic kidney disease, 1,618 patients with coronary heart disease and 1,157 patients with stroke or transient ischemic attack (TIA) recorded in the disease registers of the GP Practices that are situated within CHOC care community. **Most circulatory conditions in CHOC are higher than both the Cheshire East and England averages. The proportions for Lawton House Surgery are similar to the CHOC care community data.**

Other conditions

Congleton & Holmes Chapel care community had a higher proportion of patients on GP palliative care registers than the England average. Cheshire East has an ageing population and, therefore, it is feasible that the demand for palliative care will increase in the future.

The registered population pyramid shows that CHOC care community, in common with the Eastern part of Cheshire East, has an older population profile than England.



Public insights on community pharmacy provision in CHOC

The public survey was conducted during November and December 2021 via an online questionnaire held on the Council's website consultation pages. Printed copies and an easy-read version were available on request. A total of 514 participants submitted a response. The number of responses meant that analysis was restricted to Cheshire East level. However, it does inform us of residents' general prescription collection requirements, satisfaction with pharmacy services etc.

The public survey shows that 77% of participants were satisfied with the pharmacy services received. The majority of participants were also satisfied with pharmacy opening hours (75% satisfied) and stated that it was very easy to get to their usual pharmacy (65%). Where residents left comments, common themes included: being unsatisfied with the prescription/dispensing service (7%); long waits (6%); being dissatisfied with opening hours (5%) and being unhappy with service from staff (3%). [\(PNA 2022-25 Appendix A\)](#)

The results from the public survey showed 63% used a pharmacy near to their home, 40% used the one near to their GP Practice, 40% used a pharmacy because it is easy to park nearby, and 29% used a pharmacy because it was near shops. Within the public survey free text comments, participants ranked knowledgeable staff, prescription availability and friendly staff as the most important aspect of pharmacy service.

CHOC care community had the highest proportion of respondents at 21%, 10% of the area's adult population. The public survey respondents who reside in Congleton raised no concerns regarding access to pharmacies in terms of location.

Most pharmacies (94%) offer a prescription collection service from patients' GP surgeries. All pharmacies answered the questions regarding delivery of dispensed medicines on the community pharmacy survey, 79.5% stated that they offer this service free of charge. In terms of coverage, free delivery services are available in all care community localities. Ten pharmacies (13%) do not offer delivery services. In the public survey, of the 48% of participants who answered the question, 5% stated that they value the prescription delivery service from pharmacies.

Implications in relation to future need

Modelled projections, using ONS data, forecast a relatively large increase in population growth (5.2%) in the CHOC area; this does not include the housing developments planned in the area within this timeframe.

The size of the CHOC care community population was estimated to be 39,604 people in 2019. According to the Office for National Statistics (ONS) this is projected to grow by 1,064 (2.7%) to 40,668 people in 2024 and by a further 1,010 (2.5%) over the following five years (more than 41,600 people in 2029).

Table 1: Predicted population change for Cheshire East, 2019 to 2029 (PNA 2022-2025 Chapter 15)

Care Community	Year			Percentage change 2019 to 2024	Percentage change 2024 to 2029	Percentage change 2019 to 2029
	2019	2024	2029			
Alderley Edge, Chelford, Handforth, Wilmslow	45,105	46,248	47,349	2.54%	2.38%	4.98%
Macclesfield	61,640	62,956	64,131	2.14%	1.87%	4.04%
Bollington, Disley, Poynton	26,755	27,519	28,255	2.86%	2.67%	5.61%
Knutsford	25,062	25,807	26,426	2.97%	2.40%	5.44%
Congleton, Holmes Chapel	39,604	40,668	41,678	2.69%	2.48%	5.24%
Nantwich and Rural	38,802	39,774	40,736	2.51%	2.42%	4.99%
Crewe	79,491	80,545	81,678	1.33%	1.41%	2.75%
SMASH	67,693	69,302	70,659	2.38%	1.96%	4.38%
Cheshire East	384,152	392,820	400,914	2.26%	2.06%	4.36%

Data Source: ONS Population estimates 2019 MSOA SYOA, ONS 2018 Population projections for 2024 and 2029 Cheshire East Local Authority

Most of the increase in population size in CHOC care community will occur in the age groups 60 and above. The number of people aged between 60 and 84 will increase by 21%, and the number of very elderly people aged 85 and over will increase by 34%. The 16- to 18-year-old age group will also see an increase of 22% between 2019 and 2029. There will be only small changes in the size of other age groups in the population. This is like the increases predicted for Cheshire East overall.

CHOC Predicted prescribing need for Cheshire East, 2019 to 2029

Age Band	Year			Percentage change 2019 to 2024	Percentage change 2024 to 2029	Percentage change 2019 to 2029	Eligibility for free prescriptions
	2019	2024	2029				
0 to 4	2013	1885	1888	-6.36%	0.15%	-6.22%	Under 16
5 to 15	4930	5066	4916	2.76%	-2.97%	-0.29%	
16 to 18	1195	1374	1455	14.94%	5.92%	21.75%	Aged 16 - 18 and in full-time education
19 to 59	18375	17793	17421	-3.17%	-2.09%	-5.19%	
60 to 64	2561	3062	3221	19.55%	5.21%	25.78%	Aged 60 and over
65 to 84	9126	9886	10900	8.33%	10.26%	19.44%	
85+	1404	1603	1878	14.15%	17.18%	33.76%	
Total	39604	40668	41678	2.69%	2.48%	5.24%	

Data Source: ONS Population estimates 2015 MSOA SYOA, ONS Population projections for 2024 and 2029 Cheshire East Local Authority

People's need for prescribed medicines increases with age. Although Cheshire East is only growing moderately in terms of the overall number of people in the population, the population is living longer and there will be a proportionately higher growth in the number of people in age groups over 60.

The prescribing of medicines is predicted to grow by 7.7% by 2024 and a further 6.3% increase by 2029. This is a total increase in medicines use of 14.4% over the ten-year period. Most of the increase in prescribing need will occur among older people. Increases of this magnitude are likely in all areas of the country. Existing pharmacies may have to increase their capacity and review their working practices to meet this need. ([PNA 2022-25 Chapter 15](#)) All remaining pharmacies within CHOC care community stated that they could manage increased demand when asked on the pharmaceutical contractor's survey.

This PNA has highlighted several issues relevant to older people, including poor physical access to some community pharmacies, and insufficient accessibility aids in some pharmacies. ([PNA 2022-25 Chapter 16](#))

The relationship between house building and population growth is a complex one, but the increased availability of new homes will almost certainly impact populations at a local level and this in turn may affect pharmacy provision.

One way of estimating the population increase from new homes is to apply the Office for National Statistics occupancy rate for the Northwest. Proposed housing developments in Cheshire East are contained in Cheshire East's Local Plan Strategy 2010-2030¹² which was adopted on 27 July 2017 and covers development until 31 March 2030, beyond the time scales for this 3-year (2022-2025) PNA. However, strategic sites are divided into 5-year phases; this has enabled us to give a crude estimate of potential housing numbers within these larger developments by 2025.

Table 13: Estimates of proposed housing on main Strategic Sites in Cheshire East by March 2025 (PNA 2022-25 Chapter 15)

Care Communities	Location of Strategic Sites	Current population	Estimated New Homes		Number of current pharmacies
			Average each year	Total by March 2025	
Nantwich and Rural	Nantwich	39327	110	550	6
	Rural		3	14	1
Crewe	Crewe	79773	366	1828	15
SMASH (Sandbach, Middlewich, Alsager, Scholar Green, Haslington)	Sandbach	68642	54	272	6
	Middlewich		68	341	3
	Alsager		92	459	3
	Scholar Green		0	0	0
	Haslington		0	0	1
Congleton and Holmes Chapel	Congleton	40073	318	1589	11
	Holmes Chapel		0	0	1
Macclesfield	Macclesfield	61560	206	1029	12
Bollington, Poynton, Disley	Bollington	26837	0	0	1
	Disley		0	0	1
	Poynton		75	375	2
Chelford, Alderley Edge, Wilmslow, Handforth	Chelford	45451	0	0	0
	Alderley Edge		52	262	3
	Wilmslow		76	378	5
	Handforth		62	312	3
Knutsford	Knutsford	25004	91	453	4

Over a five-year period, the population of Congleton and Holmes Chapel care community could potentially increase by 9.2% to 43,775, purely due to housing development within Congleton. The PNA took into consideration the main strategic sites i.e., those with a final total capacity of around 150 dwellings. in relation to current pharmaceutical provision, Congleton appeared to be well provided for by pharmacies in Congleton. These developments and their position in relation to Congleton Pharmacy are shown on Map 3. Brereton – a rural area between Congleton and Sandbach – will see significant planned growth and the proposed developments of up to 400 houses at Black Firs Lane is within 1.6km of pharmacies in Congleton. ([PNA 2022-25 Chapter 15](#))

Conclusion

- Even with the closure of Congleton Pharmacy, there will still be 11 active pharmacies within the care community boundary. Factoring in the increase in population identified by the 2021 Census, the rate for CHOC care community remains the highest in Cheshire East at 25.7 per 100,000.
- With the loss of Congleton Pharmacy the dispensing workload will redistribute to the remaining pharmacies; each pharmacy within CHOC care community will need to dispense an average additional 287 items per month. The average number of items dispensed per pharmacy increases to 6,498, still below the England average.
- All remaining pharmacies within CHOC care community stated that they could manage increased demand when asked on the pharmaceutical contractors' survey.

- There remains good coverage of pharmacy provision opening hours across the care community, with extended opening hours from 6.30am and throughout the day up to midnight. There will still be two 100-hour pharmacies in Congleton.
- Congleton Pharmacy offered few additional services, all of which are offered by neighbouring pharmacies.
- All remaining pharmacies in CHOC care community offer a prescription collection service from GP surgeries and 82% deliver dispensed medicines. Residents can nominate any pharmacy to process their prescriptions, not just the one in their neighbourhood ([PNA 2022-2025 Chapter 13](#)). Using the NHS App or a similar online service or app can make the process of ordering repeat prescriptions simple and convenient.
- The high QOF disease prevalence rates for circulatory conditions for Lawton House GP Surgery in Congleton East may indicate resident poor health or equally may indicate good levels of case-finding.
- Despite income deprivation within the Congleton East ward, the health and wellbeing of the area does not follow a typical pattern, with the ward faring better than expected in terms of mortality, lifestyle, and wellbeing measures within the Tartan rug. ([Tartan Rug 2022 \(cheshireeast.gov.uk\)](#))
- CHOC care community had the highest proportion of respondents to the public survey conducted as part of the PNA process at 21%, 10% of the area's adult population. The public survey respondents who reside in Congleton raised no concerns regarding access to pharmacies in terms of location.
- Over a five-year period, the population of Congleton and Holmes Chapel care community could potentially increase by 9.2% to 43,775, purely due to housing development within Congleton.
- Additional concerns raised by residents within CHOC care community during the PNA consultation process related to another pharmacy within the area.

The increased dispensing requirements can be absorbed by the surrounding pharmacies without impacting on patient care as the care community already has the lowest dispensing levels. The PNA 2022-25 has concluded that pharmacy services were adequate for the lifetime of the PNA, which included looking at future population growth, housing developments and ageing population. Therefore, a new PNA is not necessary. The change does not meet the requirements for a supplementary statement.