

North Northamptonshire Council Enhanced Partnership Responses

<i>Stakeholder's Organisation</i>	<i>Points Made</i>	<i>North Northamptonshire Council Response</i>
Burton Latimer Town Councillor	There is a general lack of a time line	The Enhanced Partnership runs until 31 March 2025, although some measures have separate timelines stated. For other measures the timeline is dependent on funding being secured. Action: No change is required to the Enhanced Partnership Plan (EPP) and Enhanced Partnership Scheme (EPS)
Burton Latimer Town Councillor	There is a complete lack of possible costs	The costs are set out in the BSIP. Action: No change is required to the EPP and EPS
Burton Latimer Town Councillor	It would appear that costs against many of the comments are generally not born by the bus company	This is correct in terms of the on-street investment. However the investment locks in bus quality standards and the ticketing and wider measures as set out in Chapter 4 of the EPS. Action: No change is required to the EPP and EPS
Burton Latimer Town Councillor	There is no commitment to consulting local communities	Community representatives have been consulted as part of the Enhanced Partnership (EP). Further consultation will be undertaken as measures like corridor improvements come forward. Action: No change is required to the EPP and EPS
Burton Latimer Town Councillor	There is a lack of user benefit	This is defined in the BSIP. Action: No change is required to the EPP and EPS
Burton Latimer Town Councillor	There is a lack of time for stakeholders to make a full response	Stakeholders have been provided with 4 weeks to respond, this is considered appropriate for the scale of plans set out in the Enhanced Partnership. In any case the timeline was based on that originally set by the Department for Transport (to complete by 31st March 2022, although they have now extended this). Action: No change is required to the EPP and EPS
Burton Latimer Town Councillor	No mention of seeking competition on the proposals	The plans do not change the need to secure tenders if placing capital works outside of the Council and its Frameworks. For bus operators the services are mainly commercial so procurement is not an issue. Action: No change is required to the EPP and EPS

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Competition and Markets Authority (CMA)	The CMA has a statutory function within the Transport Act 2000 (as amended). Should the CMA consider that a partnership agreement does not meet the 'Competition Test', the CMA may open an investigation. The Act recognises that while an agreement might have a significant adverse effect on competition it may still pass the Test if it is a proportion means to delivering improvements to bus services. The act does not require the CMA to provide an opinion on whether the partnership proposals meet the requirements of the Test.	<p>The CMA comments are general and cover a number of EPP/EPS's which they have seen and are not made in specific response to the West Northamptonshire's draft.</p> <p>The EPP/EPS has been reviewed against each comment and the arrangements are considered to comply with the feedback, however the Competition Test has been strengthened to consider the counter-factual position.</p> <p>turning to each point:</p> <ul style="list-style-type: none"> - the first two points are CMA context. they are to note only. - the voting arrangements provide every operator of "Qualifying Local Services" with a vote, there are no proxy arrangements (where a representative operator votes on behalf of others). Therefore this is not a local concern. - Compensation arrangements only apply to the failure to run the last bus (regardless of time but subject to being due to the operators own fault). <p>Therefore the issue does not apply to this area..</p> <ul style="list-style-type: none"> - Branding - it is noted that operator own branding must be visible (on London the operator of a service is named by the entry door). This will need considering as the branding issues come forward. - the exemption criteria is believed to be transparent. Action: No change to the Enhanced Partnership Plan or Scheme however the Competition Test has been updated to include the Counter-factual position. The Competition Test does not form part of the EPP or EPS.
CMA	Any comments provided in the course of the CMA's review should not be interpreted to provide legal assurances that there will be no adverse impact for competition or that a proposed agreement is compliant with competition law. We ask that EP plans and documents, reflect this position (by avoiding references that imply that EP plans have been cleared by the CMA).	
CMA	Care needs to be taken so that voting/governance arrangements are based on contestable criteria, and do not exclude operators.	
CMA	To fully satisfy themselves, authorities should consider the state of competition under the counterfactual (ie absent the EP) and how it will be impacted by new requirements on operators. Appropriate transition periods may mitigate some of these impacts. The use of non-prescriptive/outcome based objectives may give greater flexibility to operators to deliver your objectives, but it is for the authority in partnership with operators to consider the policy objectives that are to be delivered.	
CMA	Some EPs include proposals for encouraging flexible business models, like Demand Responsive Transport, though the level of thinking and evidence base that has gone into those business models across the EP plans varies. We would encourage you to explore existing trials of these models and learn from best practice in other authorities, where it exists.	

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CMA	The removal of single operator tickets will have a potentially significant impact on the incentives of operators to compete against each other. We encourage careful consultation with operators, so that operators who are uncertain about the legal risks of offering multi-operator tickets are not excluded. We would recommend seeking legal advice to ensure that any scheme is compliant with competition law as the CMA as the UK's lead competition enforcement agency cannot provide this.	<p>The CMA comments are general and cover a number of EPP/EPS's which they have seen and are not made in specific response to the West Northamptonshire's draft.</p> <p>The EPP/EPS has been reviewed against each comment and the arrangements are considered to comply with the feedback, however the Competition Test has been strengthened to consider the counter-factual position.</p> <p>turning to each point:</p> <ul style="list-style-type: none"> - the first two points are CMA context. they are to note only. - the voting arrangements provide every operator of "Qualifying Local Services" with a vote, there are no proxy arrangements (where a representative operator votes on behalf of others). Therefore this is not a local concern. - Compensation arrangements only apply to the failure to run the last bus (regardless of time but subject to being due to the operators own fault). <p>Therefore the issue does not apply to this area..</p> <ul style="list-style-type: none"> - Branding - it is noted that operator own branding must be visible (on London the operator of a service is named by the entry door). This will need considering as the branding issues come forward. - the exemption criteria is believed to be transparent. Action: No change to the Enhanced Partnership Plan or Scheme however the Competition Test has been updated to include the Counter-factual position. The Competition Test does not form part of the EPP or EPS.
CMA	If you have plans for introducing refund guarantees on certain routes, again we would encourage careful consultation with operators, so new schemes do not create the unintended consequence of providers not wanting to service routes or enter the market.	
CMA	Where an authority wishes to require buses to adopt a standard livery or branding scheme we would recommend that operator brands should be clearly visible, particularly where operators are competing on overlapping routes. Care should be given to the impact on operators of cross-border routes.	
CMA	Where governance arrangements do not include individual representation for each bus operator, we advise that there is some form of shared representation (or similar arrangement) for smaller operators that might otherwise be excluded. Where larger operators have greater representation in governance arrangements, this should be defined by contestable criteria (e.g. total mileage) rather than fixed, named operators.	
CMA	Should you include exemptions, these should be clearly defined with objective criteria to give confidence the exemptions will be applied appropriately.	

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Transport Focus	We understand the difficulty of making legally binding commitments while Government funding remains unclear. However, bus patronage must increase and passenger satisfaction must improve, so proposals must be up to the task if BSIP targets are to be met. We will be looking for further detail and firmer commitments once that clarity emerges	<p>In the main Transport Focus' comments are both supportive and align with the Councils BSIP.</p> <p>Turning to the specific points made:</p> <ul style="list-style-type: none"> - The BSIP has had regard to Transport Focus' research and priorities - Engagement has been made with cross boundary authorities to ensure that cross-boundary services fall under one or both EP's, unless they are procured under contract to an adjoining Authority, in which case the standards will typically be met when the contract is renewed (rather than mid-contract where claims for extra cost can be made and would not be subject to competition). - The targets are set out in the BSIP. However meeting targets is dependent upon Department for Transport (DfT) BSIP funding decisions, so commitments cant be made without the funding to deliver the changes needed, likewise support is needed from Government to support bus services which patronage recovers post Covid. - The funding for new and extended routes, whilst important is not there, so it is not possible to make these funding commitments. - The core hours for weekday Tier 1 and 2 services are from April 2022. - Safety at stop and on bus is important, and CCTV will both reduce this risk and reassure bus users, however the wider point about tackling anti-social behaviours is a valid point. This is something the Partners will take up with the Police, who have been consulted on the Enhanced Partnership Directly. - Transport Focus suggest broadening out the Wider Stakeholder Group to include people representing these with protected characteristics, such wider representation would be welcomed. - Buses are already accessible to a degree, the missing element is raised bus boarders at stops, however this historic investment at local bus stops is low and the funding available means that this first Enhanced Partnership does not have the resources to address bus stop improvement at the scale needed. - On bus cleaning standards are generally satisfactory locally, they can always be improved but this is not the step change we are looking for from local bus operators. Action: No change is required to the EPP and EPS
Transport Focus	We have compared your draft Plan and Scheme with our document What passengers want from BSIPs which reflects our national research into bus passenger priorities for improvement with its robust methodology and samples. We would expect your Plan and Scheme to reflect these passenger priorities, as well as those identified through your local engagement and research.	
Transport Focus	The Plan appears to focus on the right bus services (Q1 of your consultation) however there may be implications that local people are better placed to understand and comment on. We assume that you have checked with neighbouring authorities that services that mainly operate outside of the Council area are included in their EPs.	
Transport Focus	We couldn't see much detail about targets in the Plan and Scheme so have referred to your BSIP to comment on this area. The targets set for overall passenger satisfaction and journey reliability look stretching but not unrealistic. Similarly, while the BSIP acknowledges that the long-term bus patronage targets committed to in the previous Northamptonshire Local Transport Plan (LTP) are extremely ambitious, the target for the next three years look ambitious but reasonable. However, it is not always clear how the various measures within the Plan and Scheme are linked to meeting targets. We note that you will be reporting against reviews and performance data every six months; we suggest that these reports include explanations of the rationale for the targets and any constraints in meeting them in addition to publishing the figures	
Transport Focus	Proposals must be up to the task of tackling the challenges involved in competition between car and bus caused by covid pandemic.	

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Transport Focus	<p>Your own analysis identifies that the current network doesn't provide services when people need them during the evening and on Sundays. The Plan indicates that you will require all day services to operate across common core hours (0730 to 1900) on weekdays and the Scheme says Urban Tier 1 and 2 services are required to operate core hours (arriving/departing the town centre between 0730 through to 1830hrs). However, we were unclear whether you are making a firm commitment to that from March 2022 as an improvement on current service levels and would seek clarification on this point</p>	<p>In the main Transport Focus' comments are both supportive and align with the Councils BSIP.</p> <p>Turning to the specific points made:</p> <ul style="list-style-type: none"> - The BSIP has had regard to Transport Focus' research and priorities - Engagement has been made with cross boundary authorities to ensure that cross-boundary services fall under one or both EP's, unless they are procured under contract to an adjoining Authority, in which case the standards will typically be met when the contract is renewed (rather than mid-contract where claims for extra cost can be made and would not be subject to competition). - The targets are set out in the BSIP. However meeting targets is dependent upon Department for Transport (DfT) BSIP funding decisions, so commitments cant be made without the funding to deliver the changes needed, likewise support is needed from Government to support bus services which patronage recovers post Covid. - The funding for new and extended routes, whilst important is not there, so it is not possible to make these funding commitments. - The core hours for weekday Tier 1 and 2 services are from April 2022. - Safety at stop and on bus is important, and CCTV will both reduce this risk and reassure bus users, however the wider point about tackling anti-social behaviours is a valid point. This is something the Partners will take up with the Police, who have been consulted on the Enhanced Partnership Directly. - Transport Focus suggest broadening out the Wider Stakeholder Group to include people representing these with protected characteristics, such wider representation would be welcomed. - Buses are already accessible to a degree, the missing element is raised bus boarders at stops, however this historic investment at local bus stops is low and the funding available means that this first Enhanced Partnership does not have the resources to address bus stop improvement at the scale needed. - On bus cleaning standards are generally satisfactory locally, they can always be improved but this is not the step change we are looking for from local bus operators. Action: No change is required to the EPP and EPS
Transport Focus	<p>There don't seem to be any immediate plans to provide new or extended routes and your analysis finds that the network is largely fit for current needs. However, it does acknowledge the lack of connections to Corby, Kettering and Wellingborough and we hope you would plan to address these in future network changes. We would like assurance that you will consult and communicate with passengers and potential passengers when carrying out your network review. We would like to have seen a commitment to the creation of a stable network by limiting the number of timetable changes each year</p>	
Transport Focus	<p>As we know from our research, and as you acknowledge, punctuality is a high priority for passengers. It is therefore positive to see your Plan and Scheme focus on this as an area for improvement. The work you have done to identify specific corridors where journey reliability is an issue and to help you target your resources seems sensible. The potential interventions including addressing on-street parking, traffic signal detection and pedestrian crossing detection all sound good but we note that at this stage they are subject to funding. Your plans to minimise the impact of roadworks on bus passengers by assessing the likely impact of roadworks, taking actions to mitigate and communicating with users are thorough and impressive. It seems likely that your work in this area will help you achieve your stretching but realistic reliability targets.</p>	

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Transport Focus	<p>You plan to explore the introduction of common fare stage boundary points; we agree that this could make fares easier for passengers to understand but we note that it is not a firm commitment at this stage and that a variation would be required to deliver this. We are pleased to see that all buses will offer the full ticket range offered via contactless payment from 1 April 2023 and that a multi-operator ticket will be provided across the whole area from year 2 onwards. Longer term plans to introduce fare capping are positive but are subject to technology roll out and with no firm date in place. We would seek assurance that the option to pay by cash will be retained. We couldn't see any plans to ensure that passengers could access all their pre-journey information – including fares and tickets as well as routes and timetables – on one central website or app. This is an important step in making buses easier for passengers to understand</p>	<p>Engagement has been made with cross boundary authorities to ensure that cross-boundary services fall under one or both EP's, unless they are procured under contract to an adjoining Authority, in which case the standards will typically be met when the contract is renewed (rather than mid-contract where claims for extra cost can be made and would not be subject to competition).</p> <p>Action: No change is required to the EPP or EPS</p>
Transport Focus	<p>Ambitions within the Plan to help passengers feel safe through good lighting levels at stops, attractive stops and shelters with natural surveillance, and on bus Closed Circuit Television (CCTV) are at the right level. Early steps towards this goal within the Scheme include some new shelters and CCTV but this is subject to a review and funding. From April 2025 CCTV will be installed on much of the bus fleet. These steps are heading in the right direction; to meet the ambition of your plan we would encourage you to make a commitment to tackling antisocial behaviour through enforcement and the inclusion of safety in design guidelines for buses and stops</p>	<p>Safety at stop and on bus is important, and CCTV will both reduce this risk and reassure bus users, however the wider point about tackling anti-social behaviours is a valid point. This is something the Partners will take up with the Police, who have been consulted on the Enhanced Partnership Directly.</p> <p>Action: No change to the EPP and EPS, but it is worth the Council officers discussing with the Police how best to address anti-social behaviour.</p>
Transport Focus	<p>We are pleased to see a firm commitment to installing Automatic Vehicle Location equipment on buses that will ultimately improve real time information for passengers. Plans to improve real time information at stops are also positive but are subject to funding. A commitment to producing printed timetables and ensuring stock at agreed locations is welcome. The long-term ambition to work collaboratively through the Management Forum to communicate the bus offer in a way the public can easily understand is positive and we hope to see it delivered. We would like to see an up-to-date timetable at every stop, fares information at major stops and consideration given to provide route and network connections maps at major stops.</p>	<p>In the main Transport Focus' comments are both supportive and align with the Councils BSIP.</p> <p>Turning to the specific points made:</p> <ul style="list-style-type: none"> - The BSIP has had regard to Transport Focus' research and priorities - Engagement has been made with cross boundary authorities to ensure that cross-boundary services fall under one or both EP's, unless they are procured under contract to an adjoining Authority, in which case the standards will typically be met when the contract is renewed (rather than mid-contract where claims for extra cost can be made and would not be subject to competition). - The targets are set out in the BSIP. However meeting targets is dependent upon Department for Transport (DfT) BSIP funding decisions, so commitments cant be made without the funding to deliver the changes needed, likewise support is needed from Government to support bus services which patronage

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Transport Focus	Other than a review of bus stops that would include consideration of accessibility barriers and possibly installing raised bus boarders we couldn't see any mention of making buses more accessible. We would like to see you consider audio-visual next stop information on buses if it isn't currently in place. Your Passenger Charter might usefully include a commitment to provide alternative transport, such as a taxi, where the wheelchair space is in use and to customer service training	recovers post Covid. <ul style="list-style-type: none"> - The funding for new and extended routes, whilst important is not there, so it is not possible to make these funding commitments. - The core hours for weekday Tier 1 and 2 services are from April 2022. - Safety at stop and on bus is important, and CCTV will both reduce this risk and reassure bus users, however the wider point about tackling anti-social behaviours is a valid point. This is something the Partners will take up with the Police, who have been consulted on the Enhanced Partnership Directly. - Transport Focus suggest broadening out the Wider Stakeholder Group to include people representing these with protected characteristics, such wider representation would be welcomed. - Buses are already accessible to a degree, the missing element is raised bus boarders at stops, however this historic investment at local bus stops is low and the funding available means that this first Enhanced Partnership does not have the resources to address bus stop improvement at the scale needed. - On bus cleaning standards are generally satisfactory locally, they can always be improved but this is not the step change we are looking for from local bus operators. Action: No change is required to the EPP and EPS
Transport Focus	Our research following the pandemic shows the importance of on-board cleaning for passengers. We would want to see commitment to enhanced cleaning regimes and regular removal of graffiti	
Transport Focus	We are pleased that a wide stakeholder group is involved in reviewing progress. Suggest considering the needs of disabled people will be represented. Although Local Transport Group representatives will be included in the wider stakeholder group we aren't convinced this fully addresses the requirement to consult users on how well the Enhanced Partnership is working, as required by s.138A (8) of the Transport Act 2000. We would recommend also involving groups representing people with protected characteristics and committing to some passenger research to ensure you are hearing from a representative demographic across your area. The types of information to be provided and the type of questions to be asked in such a review should be set out in brief. We note that you propose to adopt a bespoke mechanism (section 5 of your Scheme) should you need to vary your Scheme. We are pleased to see that Transport Focus, as part of the wider stakeholder group, will be consulted on any such variations	Transport Focus suggest broadening out the Wider Stakeholder Group to include people representing these with protected characteristics, such wider representation would be welcomed. Action: North Northamptonshire Council (NNC) will work with operators to improve wider representation by involving groups representing people with protected characteristics and committing to some passenger research to ensure you are hearing from a representative demographic across the NNC area. No changes is proposed to the EPP and EPS.

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Transport Focus	<p>We are grateful to have been invited to participate in the North Northamptonshire Enhanced Partnership wider stakeholder group. We look forward to working with you. We believe we can play a useful role helping the Partnership to improve bus services by designing and carrying out passenger satisfaction and other passenger research and by advising on the following matters:</p> <ul style="list-style-type: none"> • development of a Passenger Charter • improvements to complaints procedures • methodology for monitoring performance against passenger growth, punctuality and reliability targets, with sufficient granularity to identify areas which require adjustment to plans • methodology for assessing performance against Passenger Charter commitments and on complaints handling • revisions to BSIP and Passenger Charter • consultation with passengers on how well the EP is working • passenger information improvements • reporting of performance to passengers 	Action: No change is required to the EPP and EPS
Northamptonshire Police	Designing out crime aims to reduce the opportunities for criminal and anti-social behaviour from taking place at bus stops and require the operator of the service to take cognisance of crime patterns at, and the environment of stops. Operators should seek guidance on how to create safe environments and maintain that environment. As well as design the use of anti-vandal fixtures and fittings can prevent a stop from deteriorating in quality which can heighten people's fear of crime.	The requirement for buses to be fitted with CCTV is one step towards making bus use be and feel safer.
Northamptonshire Police	Reducing crime and the fear of crime at bus stops will encourage people to use the busses, feel and be safer.	Agreed, the Partnership will consult Northamptonshire Police on steps to make stops safer, delivering improvements as budgets allow. Action: No change to the EPP and EPS, but NNC officers will discuss how to make the waiting environment feel safer for bus users.
Northamptonshire Police	Raise awareness with designers and architects and provide them with a design framework for new and redeveloped stops. Encouraging them to liaise with the Police.	This is a matter for the planning authority and is outside the scope of the EP itself. Action: No change is required to the EPP and EPS

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Northamptonshire Police	The operator should be aware of details of crime and other incidents taking place on their property. It is acknowledged that most, if not all, crime will be reported to police as opposed to the operator. There needs to be therefore, regular liaison meetings between the police (be it at senior level or with a local Neighbourhood Policing Team) to discuss current and emerging crime trends. A request may also be made for police recorded crime figures to be regularly sent to the operator.	The offer of regular liaison with the Police will be taken up by the Partnership. Action: No change is required to the EPP and EPS
Northamptonshire Police	Good signage at stops to ensure that members of the public are able to request assistance if needed. This should also provide reliable up to date time tables to prevent users from having a long wait which could make them feel vulnerable.	The safer option is to provide people with access to bus information before they leave their home, reducing the wait time at bus stops. The information plans seek to bring improvement in this areas. Action: No change is required to the EPP and EPS
Northamptonshire Police	S106 developer funding needs to secure monies for security measures around more vulnerable bus stops (additional lighting – CCTV etc.) as well as for providing new routes.	This is a matter for the planning authority and is outside the scope of the EP itself. Action: No change is required to the EPP and EPS
Northamptonshire Police	Within the Partnership Scheme Document there is no aim to address reducing crime and the fear of crime. We would suggest that an aim is included as follows: Add aim in section 1.5: Reduce crime, the fear of crime and anti-social behaviour.	the EPS includes actions to reduce safety concerns at bus stops, this focuses on crime as well as fear of crime, likewise CCTV on board buses is proposed for the same reason. Action: No change is required to the EPP and EPS
Thrapston Town Council	The Council does not consider the current EPP provision acceptable and should be reviewed and considered with social and environmental aspects in mind. Consideration should also feed into the revision of the Strategic Transport Plan and S106 Schedules. There is little improvement in the services for Thrapston. Given that many people work in Kettering and our main hospital is in Kettering, the current provision is inadequate, similarly with travel to/from schools for after school clubs.	The concern raised by the Council is that bus services are inadequate and need improvement on social and environmental grounds. It would be desirable to improve bus services in the round, however this depends on services either being commercial and therefore largely funded through fare-box revenue or operated under contract supported by funding from NNC. The EP covers commercial bus services, with contracts covering supported bus services. Therefore the Town Council's comments are of a more general nature and are not directly related to the EP itself. Action: No change is required to the EPP and EPS
Kettering Town Council	The plan should aim to improve interconnectivity between bus services and railway stations as a principal objective	The matter of bus routing for commercial services is one for the bus operators themselves to determine. NNC will seek to influence operators, but the specification of routing is not a matter for the EP. Action: No change is required to the EPP and EPS

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Kettering Town Council	The plan should identify which routes will benefit from Tier 1 services (every 15-20 minutes) and make these well known to residents	These are set out in Schedule E of the EP, as they currently exist. They are also defined in the EP, mindful that service numbers and operators can change over time. Action: No change is required to the EPP and EPS
Kettering Town Council	Measures to improve awareness of bus services through timetable distribution and advertising are supported but the plans should go further and seek to provide all households and businesses with up to date information about services – with the availability of an App for smart phones and much wider and deeper availability of paper copies in libraries, GP and dentists surgeries and other public receptions or information points, and by more extensive use of electronic advice boards. A disproportionate number of bus service users are likely to be more reliant on paper copies of timetables than the general population and this should be recognised in the communications plan	The EP recognises that not every has or can use the internet or smart phone, this is changing, but for now the EPS requires paper products to be maintained. There are no plans to make sure these are available in every GP surgery etc. this is because of the cost and waste associated with distribution and production. People will be encouraged to access information electronically where they are able. Action: No change is required to the EPP and EPS
Kettering Town Council	The plan does not focus as much as it could on support for community transport provision	This is because the EP covers commercial services rather than services provided under contract. Action: No change is required to the EPP and EPS
Kettering Town Council	Whilst lower emission vehicles are identified as an objective, the plan should go further and seek the introduction, possibly as a pilot scheme, of fully electric vehicles	The request is noted and the BSIP includes an action to undertake a study of potential electric or hydrogen bus schemes (4.50-4.52), however this does not form part of the EP at this time. Action: No change is required to the EPP and EPS
Kettering Town Council	There needs to be a better system for travellers to report faults, for example, in real time information displays at bus stops	This is noted, faults at bus stops can be reported via Street Doctor, although this does not specifically state bus infrastructure faults can be reported this way. Neither the BSIP nor the EP includes anything on fault reporting and this is something the Partnership may wish to consider. Action: No change is required to the EPP and EPS at this time however the Partnership should consider whether a process to support users and the community report bus infrastructure (and service) faults/issues should be put in place. If such a change is agreed then the EPS can be amended to include this via the Bespoke Variation process.
Kettering Town Council	The plan does not address the need to recruit and retain bus drivers and this remains a risk to service quality and reliability if not dealt with.	This is agreed, but is a matter for the bus operators in running their business and not specifically a matter for the EP, the EP assumes services run as planned. Action: No change is required to the EPP and EPS

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Kettering Town Council	The creation of a stakeholder group is welcomed; given their relative populations, Kettering, Corby and Wellingborough Town Councils should have an automatic place on it.	Town and Parish Councils are part of the Wider Stakeholder Group. Action: The EPS has been amended to make clear that Town (as well as Parish) Councils are part of the Wider Stakeholder Group. This is considered a non-material change, and as such does not necessitate reconsultation of operators.
Bedford Borough Council	Bedford Borough Council has reviewed the document and has no comments. We wish you all the best in the fulfilment of these and welcome the opportunity to work with you and NNC should and when it becomes necessary as a neighbouring authority.	The support from this adjoining authority is welcomed. Action: No change is required to the EPP and EPS
Wilbarston Parish Council	We are directly involved in the operation of one service, the Welland Wanderer, which although scheduled operates only two days a week as a destination service and probably meets the criteria for a socially necessary service. We therefore agree that by virtue of excluding such activities the scheme/plan focuses on the right bus services as the higher level bus operator requirements envisaged would almost certainly not be viable for the scale of this operation and would put this service at risk.	The support for the exemption criteria is welcomed. Action: No change is required to the EPP and EPS
Gretton Parish Council	Gretton Parish Council has discussed the above Consultation and would like to express their disappointment that there are no plans to include rural bus services in the plan, despite several meetings with NNC where numerous parish councils have requested assistance in supporting their local communities with a more extensive bus service.	The reason for excluding supported services and the limitations on funding these are discussed above. Action: No change is required to the EPP and EPS
Member of the public	Sections 4.35 and 4.36 address the problem of affordability and availability for workers on a low income. Getting to work is a major headache for many workers. For the prosperity of our region it is vital that ordinary workers have access to reliable and affordable public transport from their home to their place of work. Obviously this service will not be needed 24/7 but just at certain times. Providing such a service should be a priority of the Council.	The support for affordable fares is welcomed, the issue of bus service provision, when not commercial is discussed above. Action: No change is required to the EPP and EPS
Member of the public	It is vital that there are good transport links between Wellingborough, Kettering, Corby, Market Harborough and Northampton stations. What is the point of taking the train if it takes you another hour to get to the town centre or other place of interest?	The reason for excluding supported services and the limitations on funding these are discussed above. Action: No change is required to the EPP and EPS

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Member of the public	In addition to linking to the relevant town centres why not look at providing public transport to the marvellous Country Parks in our region and to Rushden Lakes etc.? I am sure that such routes would be welcomed and used by local residents as well as visitors to our region.	NNC will examine links to support our access to leisure sites via the Visitor Economy Strategy. This may suggest improved bus services, if it does these are likely to be supported service. The reason for excluding supported services and the limitations on funding these are discussed above. Action: No change is required to the EPP and EPS
Member of the public	Finally developing a greener transport is not an option but a must if we are to combat climate change. In addition I have not seen any reference to making buses safer for passengers. Covid has had and will continue to have a big impact on passenger numbers. One thing which will certainly make people feel safer is to improve the ventilation on buses.	The BSIP includes plans to look at alternative fuels, however the EP is not able to specify this at this point in time. Once the way forward has been agreed this can be adopted via the Bespoke Variation process or a new replacement EP agreed. The fitting of CCTV is designed to help make buses safer and feel safer, this is an operator obligation under the EPS. There are no plans to specify on-bus ventilation, generally this is good, but there is limited scope to retro-fit a different system to existing buses and the cost would be prohibitive. Experience during Covid is that most bus operators have gone to extreme lengths to improve bus ventilation and cleanliness. Action: No change is required to the EPP and EPS
Higham Ferrers Town Council	They welcome any initiatives which lead to an expansion of the services and agree this is a positive move. They are keen to see more promotion and exposure of the app which has real time information about the location of the busses. In Higham Ferrers they would like to see more bus shelters and real time information at bus stops. Currently the information at bus stops on timetables is absent or out of date. We frequently receive enquiries about bus times from those who do not access the internet and it would be useful to have hard copies of timetables to hand out. The Town Council are keen to work with you to promote the bus services, particularly how and where to access timetable information which is a barrier at present.	The offer to support the number of bus services is welcomed, although the EP does not (of itself increase) the number of services. It does however put in place steps to improve access to information. Within funding limits, and as agreed with Operators, the EPS include a review of all bus stops, led by NNC, the output being an agreed rolling annual upgrade programme to install raised bus boarders and timetables cases at appropriate locations, along with new bus shelters at selected locations and CCTV at locations where safety is a concern. Action: No change is required to the EPP and EPS
Lincolnshire County Council	We have no specific comments to make on either the Scheme and Plan and wish you every success in achieving the goals you have set out and they are not dissimilar to those included in our drafts which will be subject to consultation in due course. We are interested in sharing information on your proposals to promote bus use and work collaboratively where possible to promote bus use in the East Midlands area.	The support of this adjoining authority is welcomed. Action: No change is required to the EPP and EPS

North Northamptonshire Council Enhanced Partnership Responses

Burton Latimer Town Council	The BSIP mentions a customer charter but there is no reference to customer involvement in this	The EPS says that the Customer Charter will be developed by North Northamptonshire Council in consultation with Operators and bus user representatives, this is likely to involve consultation via the Wider Stakeholder Group and there is advice published by Transport Focus which can be drawn upon. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	On the bus stop upgrades I would like to see reference to “green roofs” to mitigate some emissions	There are no plans to include green roofs at this time, that does not mean they are ruled out, but with limited funds available, improving the number of stops with a shelter is seen as a priority. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	It feels like the government funding deadline is forcing speed over “getting it right”	The comment is noted, putting in place the EP provides access to potential funding, whilst the timescales are being driven by Government this does not undermine the proposals within the EP. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	The contract focusses on the agreement between the council and bus operators but not the end users	EP's are legally an arrangement which specifications on bus operators in turn for using improved bus facilities. Users are not part of this legal relationship, but have been consulted on the BSIP and through Stakeholder consultation on the EP. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	How do they define “stakeholders” (I would think that a customer is one)	Some stakeholders are defined in law and the consultation has had regard to government guidance on the EP consultation process, this talks of Stakeholder representatives, rather than all bus users, at least for EP's of this nature which do not directly impact on bus service routes. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	Under the funding slide it indicates that the plan “cannot yet properly reflect the desires of the wider public for better services expressed in the BSIP consultation” which says to me that there was a consultation, but it isn't being taken into consideration!	The slide was presented at briefing sessions for Stakeholders, it explained that the BSIP was subject to wider consultation. The BSIP has a much longer life than the EP, the EP will either be changed or replaced by a new EP, therefore it is implicit that the EP does not (yet) cover all the matters set out in the BSIP. For example, the EP does not include electric or hydrogen buses, the BSIP includes an action to examine and make a decision on the best solution going forward so the right infrastructure can be put in place. This depends on funding. Until the funding is in place and the charging or filling infrastructure is in place then the EP can not specify the bus solution. Action: No change is required to the EPP and EPS

North Northamptonshire Council Enhanced Partnership Responses

Burton Latimer Town Council	The last info slide asks are the right people on the Wider Stakeholder Board... Who is on it? Is there customer representation?	The organisations on the Wider Stakeholder Board are set out in the EPS and this includes user representatives, examples Town and Parish Councils, Transport Focus, representatives of transport user groups, etc. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	Socially Necessary Services' are surely that: necessary and must be maintained if the aim of making bus travel more attractive is to be attained: The right busses at the right time on the right route is the minimum the public should expect from a public. In view of this maybe a 'Bus User' focus group needs to be created and consulted with.	As discussed above socially necessary services are covered by contracts rather than the EP. As contracts are renewed they will be brought into alignment with the EP. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	Daytime Urban Service times should 'fit' the needs of the working public.	Agreed, subject to commercial viability. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	Consultation with companies on the increasing number of industrial parks in the area as well as other known commercial centres is vital to ensure that workers are able to leave their cars at home and favour the bus instead.	The comment is noted. The BSIP was subject to wider consultation, the EP itself did not include businesses as this was not considered necessary given the contents of the EPP and EPS. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	There are wide shift patterns that need to be considered when arriving at a Daytime Urban Service duration.	Noted, again this is in part addressed in the EP by specifying Urban Tier 1 and 2 "Qualifying Local Services" are required to operate core hours (arriving/departing the town centre between 0730 through to 1830hrs Monday to Friday except bank holidays). Action: No change is required to the EPP and EPS
Burton Latimer Town Council	s106 monies could be used to subsidise 'Work Bus' services?	Agreed, but this is a question on how supported services are funded and not therefore a matter covered by the EP. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	The phasing out of 'Euro III' and 'Euro IV' engine busses should be given priority with a target date to move the whole fleet to carbon neutral by, at the latest, 2030 to fit with NNCs' recent pledge following their declaration of a climate emergency in February 2022.	The decision on timescales will be taken as part of the feasibility study into potential electric or hydrogen buses schemes in the NCC area, in order to inform our strategy for zero-emission buses and to form the basis of future bids for Zero Emission Bus Regional Areas (ZEBRAs) or similar funding. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	Bus Stops. Appropriately sited, vandal resistant, 'green' roofed shelters are a must in attracting car users to 'ditch the car and ride the bus'. No one wants to walk a long way in all weathers and stand in an uninviting, dilapidated, smelly bus stop if they could be cosy in their car!	Noted. The EP includes plans to review and improve bus stops, as described above. Action: No change is required to the EPP and EPS

North Northamptonshire Council Enhanced Partnership Responses

Burton Latimer Town Council	No consultation with the general public who are the users	See the answer provided above. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	What about school bus services	These are exempt and not part of the EP, this is because they do not make significant use of the on-street facilities provided by NNC. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	No time line for changing to non diesel powered buses	See above answer. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	No mention of seeking competitive offerings to run a service	Legislation requires competitive procurement of supported bus services, with certain exemptions. Procurement of bus services is not a matter for EPP or EPS's. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	No mention of running services to help workers get to place of employment (Weetabix Bus)	Workers Buses are specifically excluded from the EPP and EPS, for the same reason as school services, this avoid barriers to entry being put in place through the EPS from impacting on these services. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	No mention of who pays for what	The EPS sets out what facilities NNC is obliged to provide, which are dependent on Government (BSIP) funding and the obligations on bus operators. It is not a matter for the EPS to set out funding; this is covered in more detail in the BSIP. Action: No change is required to the EPP and EPS
Burton Latimer Town Council	Surely the use of S106 monies should be the subject of consultation	This is not a matter for the EP, it is a planning matter and consultation on S106 is through the planning process. Action: No change is required to the EPP and EPS