West Yorkshire Combined Authority | Tracy Brabin Mayor of West Yorkshire

Our Reference: 3605

18/05/2026

Freedom of Information Act 2000 Enquiry: Bus Reform Cross-boundary Services – Lotting Strategy

Thank you for contacting West Yorkshire Combined Authority ('the Combined Authority') with your request for information, received on 17/04/2026. Your request was:

"I'm requesting detailed information held by WYCA relating specifically to the assessment, planning, reinstatement and future provision of cross boundary bus services between West Yorkshire and South Yorkshire.

This request is made in the context of WYCA's published Bus Reform / Franchising timelines, which confirm that:

- *Network design work is already underway*
- *Cross boundary planning is a statutory requirement under the Bus Services Act 2017*
- *Tranche 1 franchising begins in March 2027, with procurement beginning in 2025*
- *Network planning, lotting, depot strategy and route specifications are being developed now (2024–2026)*
- *WYCA has stated publicly that draft network maps and service specifications will inform procurement documentation*

Given these timelines, the information requested must already exist in draft, working or interim form.
This request concerns WYCA generated planning information only, not operator bids or tender submissions.
Please treat each numbered item as a separate request under Section 1(1)(a).

5. Lotting strategy and depot planning for cross boundary services
Please provide:

- *Any documents describing how cross boundary routes will be included within WYCA's lotting strategy*
- *Any draft or final lists of cross boundary routes assigned to specific lots*
- *Any depot strategy documents showing how cross boundary routes will be allocated to depots*

- *Any assessments of operational feasibility for cross boundary services under franchising*

WYCA's timeline confirms that lotting and depot strategy work is being undertaken during 2024–2026."

This request was handled under the Freedom of Information Act 2000, and I can confirm that the Combined Authority holds some information covered by your request:

A number of documents relevant to your request are already published and accessible in the public domain. Information that is readily available to applicants is exempt from disclosure under Section 21(1) of the Freedom of Information Act. You may locate further material through our published committee papers using the WYCA ModernGov (link here) search function, where agendas, decisions and minutes of Combined Authority meetings are available.

Please note that some of the information contained within these sources may now be superseded; however, it represents the most up-to-date information held by the Combined Authority at the time of your request.

Information on the treatment of cross-boundary services under franchising can be found within the Bus Reform Assessment and associated documents: West Yorkshire Combined Authority's Bus Reform Assessment – link here and Consultation response report – link here.

Sections 5.2.16. and 5.2.17 on page 61 of the Bus Reform Assessment are dedicated to cross-boundary routes and show a cross-boundary route map.

The network that will be franchised is set out in the West Yorkshire Franchising Scheme 2024 which is published on the Combined Authority website – link here. A table is provided at Annex 1 within that document which sets out the list of services to be franchised (presented as the start and end points of service).

In line with Franchising legislation, the franchising scheme only applies within the West Yorkshire Combined Authority boundaries. Cross-boundary bus services are would instead require a service permit to operate within West Yorkshire as non-franchised services. The Combined Authority recently consulted on its plans for a Service Permit Regime. Information on the treatment of cross-boundary services under franchising can also be found within consultation materials on the West Yorkshire Combined Authority's Bus Service Permit Regime – link here.

Information on the allocation of routes under franchising can be found within documents associated with the Bus Reform Assessment, including 'Appendix 3.1 – Lotting Strategy' – link here.
A report on further development of the Lotting Strategy was presented in a report to the Combined Authority in January 2025 – link here. An updated Lotting Strategy which was produced in January 2025. This was an exempt item at the January 2025 Combined Authority meeting, with the wording set out below:
The information contained in the Appendices is exempt under paragraph 3 of Part 1 to Schedule 12A of the Local Government Act 1972 as it contains information relating to the financial or business affairs of any particular person (including the authority holding that information). It is considered that the public interest in maintaining the content of the appendices as exempt outweighs the public interest in disclosing the information, as publication could prejudice current and future decision making.
The updated Lotting Strategy and further details regarding the routes in each round, including route lists and service specifications, are held by the Combined Authority but are either 'work in progress' for future contracts or are in the current contract details. We are withholding these under Section 43(2) of the FoIA, which exempts us from the general duty to release information which would, or would be likely to, prejudice the commercial interests of any entity, including the public authority holding the information.

Disclosure under the FoIA is to the world at large. Section 43 is a qualified exemption, and as such, we are required to assess the public interest in withholding this information against that of its release.

The Combined Authority is committed to openness and transparency and recognises the public interest in local government spending and activities; we have therefore taken into consideration the following:

- Contracts are awarded using public money which meets the FoIA 'Public Right to Know' requirements, ensuring transparency in terms of public expenditure.
- Disclosure could promote a better understanding of how the organisation makes use of public resources and how this is reflected in its terms of spending.
- Contractors are aware that commercial information is subject to the FoIA.

However, we also consider that this information is commercially sensitive as:

- Implementation of bus franchising is being undertaken in phases, and we are currently in the initial procurement process. Information could yet change due to

the live tendering process, and releasing information at this stage which is subject to change could impact the current or subsequent phases by putting misleading information into the public domain, setting out the Combined Authority's position before market engagement, potentially restricting the market, and/or altering the behaviours of operators in bidding for tenders.

- Disclosure would weaken the commercial position of the Combined Authority as a procurer of services using public monies to obtain value for money during such tendering processes. We recognise the public interest in public authorities being able to obtain value for money with regards to the use of public funds.

It should also be noted that once procurement processes are completed, information relating to contracts will be published as part of public communications on the introduction of operational services; we therefore provide a link to the relevant page on our website: Transparency and Freedom of Information

We remain committed to openness and transparency and recognise the public interest in local government spending and activities. However, for the reasons above, we consider that the public interest in maintaining the exemption outweighs that of disclosure.

The WYCA Depot Strategy document is enclosed within this response. This document addresses the strategic framework for depot selection and their status within the franchise programme.

Certain information relating to the depot strategy has been withheld on the grounds set out below. Specifically, commercially sensitive information relating to depot acquisition has been withheld under section 43(2) of the FOIA on the grounds that disclosure of this information would or would likely prejudice the commercial interest of the Combined Authority and third parties currently engaged in those processes. The Combined Authority has identified specific and evidenced causal link between disclosure at this stage and risk of prejudice to its negotiating position and its ability to secure value for money in those transactions. The public interest in transparency around public transport infrastructure and public spending is acknowledged; however, in this instance, the public interest in maintaining commercial confidentiality in respect of live procurement outweighs the interest in immediate disclosure.

The personal data of a third party has been removed under Section 40(2) of the FOIA, which prevents the release of personal data. Disclosure would contravene UK

GDPR principle (a) because there is no lawful basis for processing or sharing the personal data as part of a request.

Legal advice and associate correspondence provided to the Combined Authority in connection with depot acquisition, contractual arrangements, and risk assessments have been withheld. This information attracts legal professional privilege under section 42(2) FOIA. We have considered the public interest in transparency, particularly in relation to major public transport reforms. However, satisfied that, while there is a public interest in transparency, the public interest in maintaining the confidentiality of legal advice, protecting the integrity of the Combined Authority's ability to obtain candid legal counsel, and preserving its position in any potential proceedings outweighs the interest in disclosure.

The Combined Authority does not hold information in relation to any assessments of operational feasibility for cross-boundary services under franchising.

If you believe that your request for information has not been handled properly, you can ask for an internal review of our decision. Internal review requests should be submitted within two months of the date of receipt of this letter.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113
Website: www.ico.gov.uk

For your information, there is no charge for making an appeal.

Yours sincerely,
Information Governance Officer
freedom.info@westyorks-ca.gov.uk