West Yorkshire Combined Authority | Tracy Brabin Mayor of West Yorkshire

Contents

SYMCA Consultation Response to WYCA 2
Franchising timescales 9

WEST YORKSHIRE COMBINED AUTHORITY

Via email: yourvoice@westyorks-ca.gov.uk

South Yorkshire
Mayoral Combined Authority
11 Broad Street West
Sheffield, S1 2BQ

Friday, 06 February 2026

Dear Consultation Team

SYMCA Consultation Response to WYCA – Bus Service Permit Regime Proposals

Response prepared by the South Yorkshire Mayoral Combined Authority (SYMCA) - Subject to refinement following technical discussions between SYMCA and WYCA officers

This response is intended to be constructive and collaborative, reflecting SYMCA's support for the introduction of a Service Permit Regime in principle, while identifying specific areas where further clarification or joint working would help ensure smooth implementation across authority boundaries.

SYMCA welcomes WYCA's consultation on the proposed Bus Service Permit Regime, recognising it as an integral element of the franchising model WYCA is putting forward as part of its transition to a fully franchised bus network (Weaver Network) operating from April 2027 with completion in late 2028.

The permit regime is designed to allow non-franchised services, including cross-boundary services, to operate within West Yorkshire after franchising launches, subject to a statutory test (s123Q(5A) of the Transport Act 2000) to ensure they benefit passengers and do not have an adverse effect on the franchised network.

SYMCA fully supports the intent of enabling beneficial services while safeguarding the integrity of franchised networks, but we have identified some practical, operational and transitional matters requiring further discussion and clarification to avoid unintended impacts on South Yorkshire bus services, operators, and passengers.

Overall, SYMCA supports the introduction of a Service Permit Regime in principle and recognises its importance in supporting effective franchising. The points raised in this response are intended to ensure the regime is implemented in a proportionate, practical and coordinated way across authority boundaries, and SYMCA is confident these can be resolved through continued dialogue.

Responses to Key WYCA Proposals

Application of the Permit Regime – Statutory Test & Definitions

WYCA's service permit regime will require services that are *not part of the franchised network* and operate within West Yorkshire to hold a permit from April 2027. This includes cross-boundary local services, event/tourist services, and new commercial/tendered services.

SYMCA Position

- We support the statutory test concept; however, clarification is needed on how WYCA will interpret the statutory test (s123Q(5A) of the Transport Act 2000) regarding how "benefits to persons making journeys on the proposed service will outweigh any adverse effect on any local service that is provided under a local service contract in the area to which the scheme relates", or how "the benefits of the proposed service to the economy of the relevant area, or to persons living in that area, will outweigh any such adverse effect" where services cross boundaries — particularly when they serve employment, educational and connectivity across SY/WY borders.

- We request detailed examples of how WYCA expects to apply the statutory test to cross-boundary services, particularly those predominantly serving South Yorkshire but with strategic demand in West Yorkshire.

- SYMCA would welcome early officer-level alignment on the practical application of the statutory test, including worked examples, to reduce uncertainty for operators and minimise the risk of inconsistent interpretation across neighbouring authorities.

Permit Conditions & Standards

WYCA's proposed conditions (contained in the draft "Service Permit Proposed Conditions" document) will set standards for permitted services, potentially touching on fares, ticketing, emission standards, fleet quality and customer information.

SYMCA Position

- SYMCA recognises the need for consistency in permitted service standards to support passenger experience and network integration.

- However, we seek clarity on which conditions WYCA believes are compulsory vs discretionary — and how these would apply in cases where services operate on both West Yorkshire and South Yorkshire networks.

- SYMCA also requests confirmation that where SYMCA-franchised services operate into West Yorkshire, the permit regime will be applied in a manner that recognises their franchised status and avoids duplicative or conflicting requirements.

SYMCA agrees with the approach to retailing and accepting WYCA's specified range of tickets and passes subject to the same fare scale with appropriate reimbursement but requests further clarification on whether the permit should place a requirement on operators to be part of a cEMV capping scheme such as Project Coral.

Impacts by Phase of South Yorkshire Franchising

Before SYMCA Franchising Commences (until Sept 2027)

- WYCA's permit regime does not activate until WY franchising begins (April 2027). Services operating fully within South Yorkshire before this point remain unaffected by the regime.

- Cross-boundary services operating into West Yorkshire before April 2027 will continue under the current deregulated system. Operators should be encouraged to engage early with WYCA's pre-application discussions (proposed by WYCA) so that operators are fully prepared for permit applications once franchising begins.

SYMCA considers it essential that no existing cross-boundary service is inadvertently disrupted at the point of transition and would welcome explicit confirmation of any continuity or "grandfathering" arrangements that WYCA intends to apply for incumbent services during the initial permit implementation.

Queries for WYCA:

- Will WYCA provide transitional guidance to operators on how current cross-boundary services should prepare and engage for permits prior to April 2027?

- Will there be a pre-application workshop or operator briefing jointly delivered by both WYCA and neighbouring authorities (including SYMCA) to ensure consistent understanding?

During the Transition Period (April 2027 – 2029)

This is when the practical interaction between the WYCA permit regime and SYMCA's franchising transition (starting Sept 2027) will become operationally significant.

Potential Impacts:

1. Cross-Boundary Service Registration: Services that cross into West Yorkshire and are not part of WY franchising will require permits.

2. Application Timing & Fees: WYCA's documents suggest an application period will open in September 2026 — well before WY franchising starts — to "facilitate a smooth transition".

3. Standards: Conditions attached to permits could require compliance with specific performance, fleet or information standards. The implications for mixed fleets operating across franchised/non-franchised territories require joint planning.

Queries for WYCA:

- How will WYCA ensure alignment of timetabling and registration processes for cross-boundary services, given that Traffic Commissioner registration cycles remain in operation?
- How will WYCA handle permit renewals / timetable changes where these intersect with SYMCA franchising procurement cycles?
- Can WYCA confirm how it will treat incumbent cross-boundary services operating immediately prior to April 2027 (e.g., streamlined processing / prioritisation to avoid inadvertent service interruption). (This is critical because the application window opens Sept 2026 and could overlap with operators' registration change cycles.)
- Will WYCA publish a clear target timetable for permit determinations, including what happens if a permit decision is delayed close to the April 2027 go-live.
- Are there any plans for proportionality for small operators**:** a lighter-touch route for low-frequency / community-scale operators should be considered, given WYCA's stated objective of avoiding excessive barriers. Please see later clarity on this comment.
- SYMCA would welcome clarification on how WYCA intends to manage the interface between exempt Section 22 services and permitted or franchised commercial services, to ensure a level playing field and avoid unintended market distortions.

During SYMCA transition (Sept 2027–2029), especially up to Barnsley franchising (Sept 2028)

This is the highest risk period operationally, because:

- WYCA's permit regime is live, and
- SYMCA is beginning franchising in phases (with Barnsley franchised Sept 2028), so operators will be managing mixed models across the SY/WY boundary.

Key risks SYMCA wants to manage jointly with WYCA:

1. Cross-boundary service stability vs "adverse effect" test: SYMCA supports protection of franchised revenue, but asks WYCA to clarify how "adverse effect" will be assessed for services whose primary benefit may be to South Yorkshire residents accessing WY jobs/health/education (and vice versa).

2. Permit vs franchising rollout mismatch: WYCA notes that a permit is required from April 2027 even if a service is not in the geographical area of the first franchising round, because the franchising scheme relates to the whole region (and roll-out in rounds doesn't change the scheme area). SYMCA requests clear practical guidance on how WYCA will ensure this does not unintentionally capture services that are intended to transition to franchising in later phases ("services in line for franchising over the transition period do not require a permit").

3. Administrative burden / compliance stacking: during 2027–2029, small operators may face: (a) permit applications, (b) registration change requirements, (c) additional conditions, and (d) potential multi-authority engagement. WYCA's free pre-application discussions are helpful; SYMCA suggests formalising a joint officer "permit clinic" for cross-boundary services that SYMCA will happily support and assist facilitating.

4. Fee proportionality, especially "no refunds": WYCA indicates no refunds if withdrawn during assessment, which can be disproportionately risky for small operators. SYMCA suggests either:

    - a "cooling-off" withdrawal window with partial refund, or
    - an explicit route to convert a flawed application into a revised one without new fees, where issues are identified in pre-application discussion.

5. Information requirements (TransXChange, maps, etc.): SYMCA supports structured data submissions but recommends WYCA provide (i) templates, (ii) worked examples, and (iii) basic technical support for SMEs/small operators, because the capability gap can be material.

Once both South Yorkshire and West Yorkshire are franchised

At full roll-out in both areas, SYMCA anticipates continued cross-boundary movement of passengers and services. WYCA notes permitted services may legitimately "look different" (e.g., livery differences and ticketing differences) because the authority has fewer levers over a commercial permitted service than over franchised services, but should note that SYMCA franchised routes will operate and require permits and would like confirmation that this "difference" will also apply to SYMCA franchised routes operating into WY permitting areas.

SYMCA's key ask post-rollout:

- formalise an inter-authority protocol so that cross-boundary services, franchised and permitted, remain legible to passengers and operationally workable for operators, while still meeting each authority's statutory duties and network integrity objectives.

Small operators and s.22 services

SYMCA welcomes WYCA's acknowledgement that permit conditions must be proportionate and not overly burdensome. In that context, SYMCA invites WYCA to consider whether the following measures could support effective implementation, particularly for small and community-scale operators:

1. Tiered/segmented process (e.g., "light-touch" for low-frequency/limited-stop/seasonal/limited-vehicle services) with proportionate evidence requirements.

2. SME support package (transition period Sept 2026–Apr 2027 and through 2027–2029):

    - standardised templates (TransXChange guidance, map standards, "minimum viable" customer info pack),
    - a named technical contact point,
    - virtual "permit surgeries" for cross-boundary/small operators.

3. Clear decision timescales and service-continuity protections for existing services.

4. Fee design that avoids cliff-edges (e.g., reduced fees for micro operators / community-scale services) and reconsideration of the "no refunds on withdrawal during assessment" policy for small operators.

Further discussion SYMCA proposes with WYCA

To ensure WYCA's permit regime is workable for South Yorkshire services and operators—before Sept 2027, through 2027–2029 (especially to Barnsley Sept 2028), and post-full rollout—SYMCA proposes a short programme of joint clarifications:

1. Cross-boundary "adverse effect" methodology: what evidence WYCA expects; how WYCA will handle services with clear cross-boundary labour market and access benefits.
2. Permit decision timeline / contingency plan: especially for determinations close to April 2027; handling of variations/retimings.
3. Permit exemptions and boundary-edge cases: explicit treatment of positioning trips, partial open/closed service patterns, and locally registered coach-type operations (where WYCA notes exceptions).
4. Operator support & SME proportionality: confirm WYCA's approach to templates, surgeries, and technical assistance; agree a joint comms plan to reduce operator confusion.
5. Stations/stop access interface: WYCA notes separate guidance for bus station slots/stopping on the WYCA website; SYMCA requests alignment principles for cross-boundary services so that access arrangements don't become an unplanned barrier or have consequential impacts on service coordination within South Yorkshire.
6. Fares and Ticketing: SYMCA requests further meetings to clarify the approach to fares and ticketing and to agree how cross-boundary travel and cEMV capping should be managed.

SYMCA proposes that these discussions culminate in a short, jointly agreed set of cross-boundary principles or guidance notes, to provide clarity for operators and ensure consistency of approach across both authorities during and after the franchising transition.

SYMCA welcomes the opportunity to respond to this consultation and supports WYCA's ambition to introduce a Service Permit Regime that complements franchising and protects the integrity of the wider bus network. We believe that, with continued collaboration and early alignment on the points set out above, the permit regime can be implemented in a way that

maintains vital cross-boundary connectivity, provides certainty for operators of all sizes, and delivers positive outcomes for passengers across both South Yorkshire and West Yorkshire.

SYMCA looks forward to continuing to work closely with WYCA as these proposals are refined and implemented.

Yours faithfully

S.40 Personal Information

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DIRECTOR OF BUS REFORM

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Mayoral Combined Authority
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S.40 Personal Information

Sent: 12 August 2025 11:28
Subject: RE: Franchising timescales

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Hi All,

Hope people are managing some time off over the summer!

Thanks for this S.40 P agree makes sense for us to be joined up and sharing. No issue from us on 12 Nov – in West Yorkshire we will have gone out for our Round 1 contracts in October so I would expect we will be in dialogue phase with operators then and am sure can avoid seeking specific operator meetings on that date. Also to note we're having a short market engagement session on 18 August to launch our "Dynamic Market" under the new procurement regs.

Our fuller schedule of dates looks like this, and we are just firming up what the final timescales are for the first tender process following some healthy feedback on timescales from operators (likely that we will be seeking the final tender submissions for March 26):

Round	Anticipated Tender Launch Date	Anticipated Mobilisation Start Date	Anticipated Service Commencement Date
1	6th October 2025	28th June 2026	4th April 2027
2	30th July 2026	28th April 2027	30th January 2028
3	30th April 2027	28th January 2028	29th October 2028

Hope that helps.

Best regards,
S.40 P

Strategic Head of Bus Franchising Transition
West Yorkshire Combined Authority
S.40 Personal Information

Sent: 24 July 2025 15:06
Subject: Franchising timescales

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi all,

Hope everyone is well. I've spoken with some of you about this already – I'm flagging that is likely that we will all be doing very similar activities at the same time around either our T1 or T2 franchise procurements and it might be worth us sharing key dates to try and avoid any unintended consequences, or at least understand where we might have challenges.

There is almost certainly going to be unavoidable crossover where we have procurements running concurrently but we might benefit collectively from sharing dates and trying to stagger things whether we can. For example – we probably don't want a situation where we have large tenders closing on the same day.

In that spirit I wanted to share that we are planning an operator market engagement day on 12th Nov, so my first check is to make sure no one else is planning to do the same thing that day!?

Other dates are still indicative but in broad terms we are planning to launch our main T1 tender 1 May and close 28 Aug 2026.

If people are willing to share that would be great, or I'm happy to fix up a quick call to discuss

Cheers,

S.40 Personal Info
Director of Bus Reform