Our Reference: 3351

13/05/2026

Freedom of Information Act 2000 Enquiry: Bus franchising request for information

Thank you for contacting West Yorkshire Combined Authority ('the Combined Authority') with your request for information, which was received on 10/03/2026.

Your request was:
I request full information relating to the franchising programme, including the rationale and evidence behind the selection of depots for franchising. This includes the identity and status of each depot (existing, to be acquired, leased or otherwise secured) and all assessments, modelling, feasibility work, internal correspondence and documents explaining why these depots were chosen and why alternatives were rejected. This includes any operational, financial, legal or risk based evaluations used in the decision making process.
I also request complete information on the routes proposed to be franchised or permitted, including the criteria, modelling outputs, consultation responses, internal reasoning and any documents explaining why particular routes were allocated to franchising or permitted status. This includes any scoring methodologies, prioritisation frameworks or operator submissions that informed these decisions.
Please provide all information held regarding cross-boundary services into neighbouring authorities, including assessments, correspondence, negotiations and the rationale for the proposed treatment of each cross-boundary service within the franchising model.
I request the full implementation timeline for franchising, including key milestones for each tranche and all documents relating to depot acquisition, leasing, refurbishment or construction. This includes business cases, procurement strategies, internal papers and any documents setting out planned timescales or dependencies.
Additionally, full details of vehicle procurement and fleet strategy are requested, including whether a manufacturer has been selected, the procurement route used, the number of vehicles to be purchased for each tranche and the number expected to be transferred from incumbent operators. Please include all vehicle specifications, including any age limits, emissions standards, accessibility requirements and any commitments to the introduction of electric or hybrid vehicles. What is the planned fleet composition, including the expected percentage split between double-deckers, single-deckers, midi-buses and whether articulated buses are being considered or planned for introduction.
For the planned franchised network, please provide the full proposed service details, including route descriptions, planned timetables, planned spans of operation, GIS

mapping files (such as shapefiles or GeoJSON), network planning datasets and all tender specifications covering operational, performance, vehicle and evaluation requirements. Finally, please confirm whether West Yorkshire Combined Authority intends to apply any block, cap or limit on the number or proportion of contracts that may be awarded to a single operator and provide any documents setting out the rationale, legal advice, risk assessments or internal discussions relating to such limits.

This request is being handled under Freedom of Information Act 2000.

We have completed our searches, 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.

As part of your request the following documents are attached below:

No.	Document name	Relevant to point
D1.	Ref 3351-Statement of Requirements: Vehicle_Spec _Wheelchair_Accessible_Buses	Point 5
D2.	Ref 3351-Fleet Technical Specification Lot A	Point 5
D3.	Ref 3351-WYCA_Depot Strategy	Point 1
D4.	Ref 3351-CA99099 - Lot 1 EV Single Decker - Task Order Form – 1	Point 5
D5.	Ref 3351-CA99099 - Lot 2 EV Double Decker - Task Order Form – 1	Point 5
D6.	Ref 3351-CA99099 - Lot 2 EV Double Decker - Task Order Form – 2	Point 5

1. Rationale and evidence behind the selection of depots for franchising

The Ref 3351-WYCA_Depot_Strategy document (D3) 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.

2. Routes, service permits and franchising allocation

The following documents are publicly available:

- Service permit regime and associated consultation materials – link here
- West Yorkshire Combined Authority's Bus Reform Assessment– link here and Consultation response report – link here
- West Yorkshire Franchising Scheme for Buses (2024) – link here
- Equality Impact Assessment – link here

Routes are located within the annex lists of the West Yorkshire Franchising Scheme for Buses 2024 document, which is in the public domain (see list above).

Network planning datasets as a category are considered too broad and insufficiently specified to constitute a clear identifiable body of held information for the purposes of this request.

Further details regarding routes, including route allocation information, modelling, internal reasoning, methodologies, mapping files and tender specifications as live, 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), 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 '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 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.

Some elements also fall under Section 22 of FOIA, applies where information is held with a view to publication at a future date, and it's reasonable in this circumstance that information should be withheld pending that publication. We have a clear intention to publish in an appropriate format once the relevant work has been completed and brought to a publishable standard. Publication of working documents in their current form would risk presenting an inaccurate or misleading picture of the proposed network, and the public interest is best served by ensuring that information is published in a complete, accurate and accessible form.

3. Cross boundary services

Information relating to cross-boundary bus services that is already publicly available, such as current timetables, can be accessed through operators' published materials.

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.

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 and associated consultation materials – link here.

As noted in Section 2, further details regarding routes, including route allocation information, modelling, internal reasoning, methodologies, mapping files and tender specifications as live, are held by the Combined Authority (and which include information on cross-boundary services) but are either 'work in progress' for future contracts or are in the current contract details. Additionally, information relating to cross boundary services into neighbouring authorities, in the form of correspondence with neighbouring authorities, is held by the Combined Authority.

We are withholding these documents under Section 43(2), 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.

Disclosure of these documents would be likely to prejudice the commercial interests under section 43(2) of the Combined Authority and potential bidders, particularly where the content includes assessments or discussions with neighbouring authorities or operators that remain sensitive in the context of ongoing programme development. For this reason, the information is withheld.

4. Implementation timeline and key milestones

Reports to the Combined Authority Board meeting (January 2025), which are publicly available and linked here, include discussion of implementation timeline at a programme level.

Information on the full implementation timeline for franchising is considered too broad and insufficiently specified to constitute a clear identifiable body of information held for the purposes of this request. 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.

Business cases, procurement strategies and internal working papers relating to depot acquisition refurbishment or construction contain information that falls within the scope of the exemptions applied under section 43(2) as set out in Point 2 above and are withheld accordingly.

5. Vehicle procurement and fleet strategy

Procurement Statement of Requirements and Technical specifications for Lot A acquisition (D1 & D2) are enclosed with this response. It sets out the vehicle and emissions standards, accessibility requirements and associated technical criteria. Additionally, documents currently ongoing procurement for acquisition are attached (Track orders: D4-D6). Information relevant is also publicly available on our WYCA board committee meeting papers (link here).

Further documents associated with these meetings were provided to decision makers at the Combined Authority but were treated as private appendices at the time of publication of the meetings in accordance with paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972. These papers were re-assessed for disclosure as part of this request to see if the passing of time has affected where the balance of public interest lies:

- Fleet Strategy (May 2025)
- Fleet Provision Outline Business Case (October 2025)

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. These documents pertain to the Combined Authority's acquisition of assets - which remains ongoing - and include ongoing negotiations with asset owners as well as future procurements for new vehicles. Releasing information relating to this is likely to weaken the commercial position of the Combined Authority as a procurer using public monies to obtain value for money during such tendering processes.

Regarding the specific composition of the proposed fleet, including expected spilt between double-deckers, single-deckers, midi-buses and any consideration of articulated vehicles, this information is not held in a finalised form and, to the extent it exists in any form falls within the scope of the live tender exemption described above. Following the conclusion of contract award, we intend to publish some details of the successful contract acquisition in accordance with our transparency obligations. This is withheld under Section 22 pending publication following successful tendering, as it is reasonable to be held until that point. Information relating to vehicle transfers from incumbent operators and full vehicle specifications will not form part of that post-award publication at this stage.

The fleet procurement route being used is consistent with our published procurement obligations– invitation to tender (ITT). Details of the fleet procurement approach have been published within our Board meeting papers, which can be accessed here. We can confirm at this stage that the phase 1 procurement process is ongoing and is being finalised. Beyond this, we are unable to provide further details, as the information forms part of a live procurement exercise.

6. Operator Contract Limits

The contract limits form part of the live tender documentation and will also be included within the final awarded contract. Documents setting out the detailed rationale, internal discussions and risk assessments relating to any such limit form part of the live procurement design and are withheld under section 43(2) of FOIA. Disclosure of this

information would be likely to prejudice our commercial interests by revealing its approach to structuring market prior to the conclusion of the procurement and would risk prejudicing against the interest of actual or prospective tenders.

Legal advice obtained in connection with the design and legality of any contract limit, including advice on competition law and procurement compliance, is withheld under section 42(2) of FOIA for reasons set out in point 2 above. The Combined Authority notes that relevant procurement documentation, including information on contract structures, will be published in accordance with our Transparency obligation following contract award.

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
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