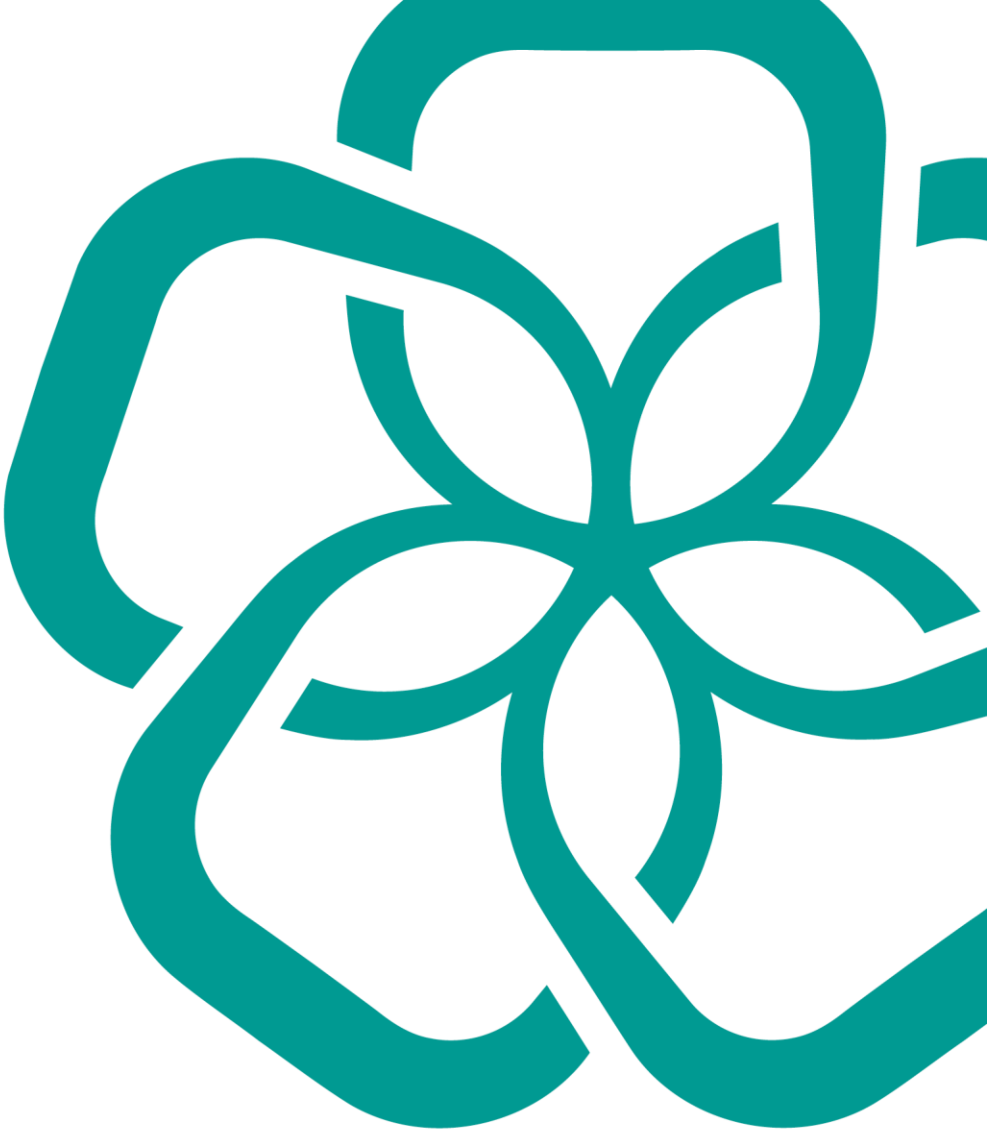
West Yorkshire Combined Authority | Tracy Brabin Mayor of West Yorkshire



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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

S.40 Personal Information
DIRECTOR OF BUS REFORM

South Yorkshire
Mayoral Combined Authority
S.40 Personal Information

West Yorkshire Combined Authority | Tracy Brabin Mayor of West Yorkshire

SYMCA Bus Reform Consultation

West Yorkshire Combined Authority response

January 2025

The West Yorkshire Combined Authority (WYCA) is in the process of delivering bus franchising for the region following a decision by Mayor Tracy Brabin in March 2024, with the first round of franchised services to be launched in March 2027 and a fully franchised network to be in place by October 2028.

The West Yorkshire Combined Authority agrees that franchising can provide greater strategic benefits than a commercial network and notes the alignment between the eleven objectives set out in SYMCA's Assessment and our objectives for a franchised network in West Yorkshire.

The West Yorkshire Combined Authority is responding to SYMCA's bus franchising consultation as a neighbouring franchising transport authority and as noted below, would welcome to continue working together both in the development of our franchising plans and the franchising option should that be the option that SYMCA choose to proceed with.

Our response focuses on a selection of questions within the Long Questionnaire which WYCA feels are of greatest importance both strategically, and through delivery and implementation of franchising schemes. Each of these questions are responded to below.

3. The Proposed Franchising Scheme would cover the whole area of South Yorkshire. This includes the four district authorities of Barnsley, Doncaster, Rotherham and Sheffield. It would apply to all services across South Yorkshire (other than some services excepted from the Proposed Franchising Scheme and services to which the Service Permit Scheme would apply). Do you have any comments on this?

In developing our franchising scheme, the West Yorkshire Combined Authority included the whole region of West Yorkshire. This aligned to our strategic case in bringing bus customer benefits across the whole region and we would support the proposed approach set out in the SYMCA's Proposed Franchised Scheme to include the whole area of South Yorkshire.

We note the important strategic links between West Yorkshire and South Yorkshire with cross-boundary bus services serving customers who travel for economic, educational and leisure reasons between our authorities. We recognised this within our Assessment where we set out how cross-boundary services would be facilitated through a service permit regime and would like to ensure that we discuss cross boundary ticketing and fares with SYMCA as plans develop.

In line with the response submitted by SYMCA to our Bus Reform consultation, we recognise that there are multiple operators serving South and West Yorkshire and would appreciate further conversations to understand the detail behind your proposals and how they will impact bus customers that utilise cross-boundary services

WYCA is in the process of developing a service permit regime for West Yorkshire and would welcome a dialogue with SYMCA to ensure that the approach by both Authorities allows for the continuation of cross boundary services and for the service permit regime to provide better integration for customers.

4. Appendix B Annexes 1 and 2 of the Proposed Franchising Scheme list the local services which are proposed to be included and exempt. Do you have any comments on these? See Appendix B, Annexes 1 and 2 of the Proposed Franchising Scheme for a list of services included and exempt.

The Combined Authority did not include any cross-boundary services within their scheme, apart from a single service that has a limited number of services that originate/end in Doncaster at the start and end of the day. It was understood that cross-boundary services will instead operate under a service permit, and it should be noted that cross-boundary services continue to be strategically important to the Combined Authority. Within the Combined Authority scheme there were several exceptions to services including closed school services, rail replacement buses, and cross boundary services.

The SYMCA scheme has taken a different approach demonstrated by the list of franchised services in annex 1 which include a number of origin and destination points that are in West Yorkshire (such as Wakefield, Holmfirth (Kirklees) and Leeds). Further discussion of how these services will be included within your scheme would be required.

It is noted that closed school services are not excepted from the scheme which appears to be a point of difference between the West and South Yorkshire schemes. We recognise the points raised by SYMCA in your response to our Bus Reform consultation regarding cross-boundary academic services and how these should be treated and further discussions on these would be useful to consider in the future.

5. The Proposed Franchising Scheme outlines the key dates on which Franchising would come into operation. Do you have any comments on this? See Section 3.3 of the consultation document for information to support answering this question.

Letting contracts in tranches aligns to the approach taken by West Yorkshire which includes three rounds covering 10 franchise zones. This approach was taken as it is considered to be more deliverable and should allow for better competition within the market.

The key dates concerning the West Yorkshire scheme are outlined below.

Round	Key procurement activity	Date
Round 1 (Heavy Woollen, Kirklees, Leeds 3)	Round 1 procurement	October 2025
	Mobilisation period	Quarter 3 2026 – Q2 2027
	Services go live	March 2027
Round 2 (Five Towns, Leeds 1, Wakefield)	Round 2 procurement	Q3 2026 – Q2 2027
	Mobilisation period	Q2 2027 – Q4 2027
	Services go live	January 2028
Round 3 (Bradford, Calderdale, Keighley, Leeds 2)	Round 3 procurement	Q2 2027 – Q4 2027
	Mobilisation period	Q1 2028 – Q3 2028
	Services go live	October 2028

The key assumptions for the Franchising Options are: (i) Design Phase (preparation for Franchising Scheme) Financial Year 2024-25 to 2026-27, (ii) Transition Period (procurement of franchise contracts) Financial Year 2027-28 to 2029-30, followed by (iii) Business as Usual (all franchise contracts in operation) from Financial Year from 2030-31.

Tranche Number	Planned Start	Depot
1	2027-28	Ledger Way (Doncaster) and Olive Grove
2	2028-29	Barnsley and Rawmarsh (Rotherham)
3	2029-30	Sheffield Depots – Holbrook, Ecclesfield and Halfway

The Combined Authority set out a contract mobilisation period of 9 months and we note that the SY mobilisation period is shorter than WY (6 months opposed to 9 months). We note differences may be due to the different approaches taken over the approach to assets across the Assessment's and that market engagement in the SYMCA Assessment indicated that a 6 month mobilisation period would be appropriate.

It is noted that contracts will be let in tranches between 2027-28 and 2029-30. There is particular interest in tranche 1 (Doncaster) and 2 (Barnsley) due to cross boundary services and potential overlap with procurement activities. We have provided key timelines that we have published in our Assessment that outline dates for procurement and it would be useful to discuss these further. It is noted that overlap may bring

challenges in attracting competition for a range of bidders, and may particularly impact smaller operators who may not have the mobilisation capacity of larger bus companies, however aligning on dates could bring advantages for bus customer consistency and further discussion on this point would be advantageous.

We support the SYMCA response to our Bus Reform consultation and the need to work together to ensure challenges and risks arising from a busy, competing market are considered and worked through effectively should SYMCA choose to proceed with franchising.

10. The Strategic Case assesses the potential impact of the Proposed Franchising Scheme in South Yorkshire on neighbouring local authority areas. Do you have any comments on this? See Section 4.2.5 of the consultation document for information to support answering this question.

It is noted that within the SYMCA assessment that there are 'no likely impacts identified' on transport plans and policy and differences between options that would affect West Yorkshire. It is welcome to see that cooperation over aligned objectives could bring benefits to policies and passengers. We do however note that overlap in timescales may introduce additional challenges to introducing franchising in West Yorkshire as noted in our response to question 5.

We would reiterate the strategic importance of cross-boundary services to the Combined Authority and note a difference in Assessment approach taken with the Combined Authority not including any cross-boundary services (apart from the exception noted above) and SYMCA including these services. It would be useful to continue conversation to ensure the best outcomes for passengers and note that co-operation in regard to procurement and operation of cross-boundary services is within the SYMCA Assessment.

We note that SYMCA's response to our Bus Reform Consultation notes the importance of Service Permit Conditions and the potential impact on operators in the South Yorkshire region. We would welcome discussions to encourage alignment across specified standards within the Service Permit Regime to encourage consistency for bus customers.

17. The Commercial Case proposes that, under the Proposed Franchising Scheme, South Yorkshire Mayoral Combined Authority would own both the bus fleet and strategic depots required to deliver services and provide them to operators. Do you have any comments on this? See Section 4.4.6 of the consultation document for information to support answering this question.

The Combined Authority has set out the intent to own strategic depots and gradually transition to a Combined Authority owned zero emission fleet for larger contracts in our Assessment. This broadly aligns to the SYMCA Assessment and is on the basis on reducing barriers to competition through provision of strategic depots and fleet for larger contracts allowing for greater competition for contracts. It would be useful to discuss conversion of depots to support ZEB transition, particularly working together to support District Network Operator (DNO) connections.

The Combined Authority set out the intention for a gradual transition to a Combined Authority owned fleet, investing in new zero-emission vehicles for Lots aligned to a strategic depot. The fleet strategy is currently under development, which details plans for fleet transition under Franchising. This gradual approach to fleet ownership appears to differ to the SYMCA approach in which a fully owned MCA fleet is assumed from day one of contracts.

SYMCA make reference to providing MCA owned fleet under franchising option B and it is assumed this will be in place on day one of contracts. Tranche 1, if undertaken as stated in the Assessment, requires 375-425 vehicles and, noting potential overlaps in procurement between WY and SY, including acquisition of vehicles, it is important to continue conversations around key procurement activities and developing a Residual Value (RV) mechanism that does not lead to market disruption for either authority. If it is the intention for SYMCA to procure up to 425 vehicles for tranche 1, whilst keeping its commitment to have no franchised vehicles over 15 years old, the challenges in achieving this due to market conditions and current fleet within SYMCA should be noted as operators may not invest in fleet renewal if a decision to franchise is taken and 9% of current fleet already exceeds 15 years.

It is noted that a more gradual approach to the adoption of zero emission buses is proposed in South Yorkshire when compared to plans within West Yorkshire.

It is noted that within the SYMCA response to the Combined Authority that there are potential opportunities to procure fleet in collaboration “achieving benefits through economies of scale arising from a greater buying power”. We would welcome further discussions on this as we develop our fleet strategy.

19. The Commercial Case explains the importance of competition in delivering the Proposed Franchising Scheme and sets out approaches to maximise the benefits of competition. Do you have any comments on this? See Section 4.4.10 of the consultation document for information to support answering this question.

The Combined Authority recognised the importance of competition through our Bus Reform Assessment and recognised this through our Commercial Success Factor based on driving competition for contracts. The SYMCA Assessment looks at similar levers of breaking down barriers to competition through provision of fleet and depots to franchisees.

We are currently undertaking more detailed planning around our Performance Management Regime and have similar mechanisms around incentivising and penalising performance. It would be useful to discuss performance regimes in more detail should SYMCA choose to make a franchising scheme.

As noted in our response to question 5, overlap in time periods for contracting, mobilisation and service launch could create additional challenges or opportunities around competition. For bus reform to benefit both West and South Yorkshire working together to address these issues would be worthwhile to ensure competition remains within the market.

Find out more

westyorks-ca.gov.uk

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All information correct at time of writing

West Yorkshire Combined Authority | Tracy Brabin Mayor of West Yorkshire