

Wiltshire Council

Cabinet

14 November 2023

Subject: Strategic Operational Depot Strategy

Cabinet Member: Cllr Caroline Thomas - Cabinet Member for Transport, Streetscene and Flooding

Key Decision: Key

Executive Summary

In January 2020, the Cabinet received an update on the Strategic Depot Review, including Winter Maintenance Facilities, and approved the progression of the next stage of the Depot Review including an additional budget allocation of £3.5m for new projects (Cabinet Minute item 6).

The Review in 2020 noted the strategic direction (based on consolidation of sites where practical in the north, centre and south areas) and a phased approach to implementation. It was also agreed that Household Waste Recycling Centres (HWRC) and Waste Transfer solutions should be included in the Review.

The construction work on Winter Maintenance Facilities is nearing completion, and the comprehensive review, led by Highways and Transport, the Directorate responsible for the operational depots, has been completed.

This report details the findings of the Review and recommends a phased delivery plan, including consolidation of sites and disposal of surplus sites, which will enable the Council to deliver its statutory requirements in a more cost effective and efficient manner.

The recommendation relates specifically to the need to proceed with the establishment of a central area strategic depot in Melksham, on the former Christie Miller Sports Centre and the former golf course site, as a council owned and operated provision. Cabinet is also asked to approve the co-development of business cases for strategic depots in the north and south of the county, which would be reported to Cabinet at a later date and subject to separate Cabinet approval processes.

In relation to the central area depot, the report proposes the Council move elements of the Hills' waste operation at Sands Farm. However, it will require the waste collection depot at Royal Wootton Bassett to be re-commissioned.

The proposed phased plan for depot delivery is evaluated over a thirty-year period and develops the detail for the business case for the three area-based depot approach, resulting from the consolidation of the current council and contractor facilities. The approach will meet the future service challenges, recognising the interdependencies with the Council's Fleet Strategy and Waste Management

Strategy, and the proposed programme is determined by key dates including the Council's 2030 Carbon Commitment, the 2026 Waste Contract and 2032 Highways Contract.

Analysis of the costs avoided, over a 30 year period for the central area Melksham depot, shows total revenue cost avoidance of £8.931m and capital avoidance of £8.650m (not including inflation). Cost avoidance is achieved by the reduction in the number of sites, the footprint and removal of duplicate assets and their maintenance.

To achieve the avoidance of costs, services would need to be relocated from contractor provided facilities and Council owned depots to the proposed purpose-built facility in Melksham. Additional investment in existing depots in the north and south of the county, to ensure business continuity, will be required until new depots in those areas are available for use. Nonetheless, the phased approach limits financial and operational risks.

Proposal

That Cabinet:

1. Endorses the report and recommends to Full Council to approve a capital budget of £37.928m for delivery of a new central area strategic depot at Melksham while ensuring all remaining depots remain compliant, funded by £1.870m Capital Receipts and £36.058m borrowing.
2. Approves the co-development of business cases for new strategic depots in the north and south of the county. Funding for these phases will be subject to approval based on the detailed business case being subject of future Cabinet reports.

Reason for Proposal

To ensure the Council can continue to deliver statutory services and Business Plan priorities, as relates to Highways and Transport, Streetscene and Waste, through a phased implementation of new strategic depots that deliver operational and cost efficiencies.

Terence Herbert
Chief Executive

Wiltshire Council

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Purpose of Report

1. That Cabinet:

- a) Endorses the report and recommends to Full Council to approve a capital budget of £37.928m for delivery of a new central area strategic depot at Melksham, while ensuring all remaining depots remain compliant, funded by £1.870m Capital Receipts and £36.058m borrowing.
- b) Approves the co-development of business cases for new strategic depots in the north and south of the county. Funding for these phases will be subject to approval based on detailed Cabinet reports.

Relevance to the Council's Business Plan

2. The Council delivers statutory services from its depot portfolio and this proposal aims to ensure that it can continue to do so from compliant, fit-for purpose facilities, aligned to future growth requirements.
3. The services provided contribute to the Council's following Business Plan priorities:
 - Thriving Economy
 - Resilient Communities
 - Sustainable Environment and
 - Empowered People.
4. The Strategic Depot review reflects aspirations to work with our partners to innovate the way we operate, helping services to transform the way they work, and also deliver on their social value commitments.

Background

5. Following the Strategic Depot Review in 2019 (Appendix 1), the Council invested in its Winter Maintenance facilities to ensure service delivery and compliance and made a commitment to review other depot provision as detailed in the Strategic Depot Implementation Plan, received and approved by Cabinet in January 2020. (Cabinet Minute item 6).
6. Highways and Transport are responsible for the Council's operational depots and led the review, post 2020, into the future depot provision.

7. The purpose of the review was agreed to facilitate the optimum use of Council assets, whilst balancing service needs and future operational market conditions. The objectives of the review include the need to:

- Further reduce the overall number of operational depots;
- Identify strategic locations for operational depots, including in the north and south of the County;
- Reduce the carbon footprint of depots and services using them;
- Provide the best balance of need within the depots;
- Establish a competitive market position for future service tenders;
- Reduce the operating costs of the operational depot portfolio;
- Ensure contractors and client teams make relevant financial contributions to operating costs of the depots.

8. This review of the Council's Waste, Streetscene and Highways depots has now been completed and a phased implementation plan is proposed, initially delivering a new, central area, strategic depot in Melksham.

9. Operational services for Highways, Streetscene and Waste are currently provided in, or adjacent, to a number of Council depots, namely:

- Bath Road, Chippenham (Highways)
- Riverway, Trowbridge (Waste and Streetscene)
- Churchfields, Salisbury (Waste and Streetscene)
- Wilton (Highways)
- Kennet House, Devizes (Streetscene)
- Household Recycling Centre (HRC) Churchfields, Salisbury
- Lancaster Road, Melksham
- HRC Bowerhill, Melksham
- HRC Chippenham

10. The Council's contractors also provide depot facilities at:

- Sands Farm, Calne (Waste Collection)

11. Further Council contractor facilities are provided at:

- Lower Compton (HRC)
- Purton (HRC)

12. Two further Council owned sites have historically been used for operational services:

- Semington (Highways)
- Royal Wotton Bassett (Waste)

13. The Council's depot provision needs investment to ensure:

- It is fit for purpose to deliver statutory services and Business Plan objectives;
- To accommodate future growth in demand;
- To meet the Council's carbon commitment by 2030;

- To provide sufficient space such that, when services are tendered, contractors have access to the right facilities in the right places, thereby being attractive to the market.

14. Wiltshire Council's depot definition is the use of land for the storage of any plant, machinery, materials or required infrastructure used in the course of its statutory waste collection and highway services.

15. Other services, where there are synergies, may occupy a depot where best value is achieved, this would include Household Recycling Centres, Streetscene, Fleet, Rights of Way, Housing Revenue Account funded activities and Passenger Transport services.

Main Considerations for the Council

16. The Council faces a number of challenges in seeking to meet the forecasted growth in statutory services with the currently operated depot stock. The depots are too small, located in areas with poor access, located in areas that cannot deliver operational efficiencies and, in many cases, do not have the required infrastructure, for example, to facilitate delivery of the Fleet Strategy through electric vehicle charging infrastructure.

17. The Council has previously identified the need to maximise the use of depots and minimise land use requirements and, thereby, reduce costs by co-locating operational services where benefits can be identified. In developing options for future strategic depot provision, best design (traditional build materials and modular) with assumed shared facility provision (fuel, welfare, workshop, office and management) have been applied in the assumptions to identify the required depot sizes.

18. Whilst depots may include Household Waste Recycling Centres (HRCs), equipment used for Winter Resilience, Fleet provision and other such services, this is only where there are synergies within that local area. If not included in the identified strategic area depot, separate plans for those services will be subject to their own funding arrangements.

19. Wiltshire comprises over 1,000 square miles, with the distance by road from Ashton Keynes in the north to Downton in the south being an approximately 120 mile round trip. It is home to over 510,000 residents (2021, census). With such a large geographical area and population dispersed across urban centres and rural settlements, the data collected during the review (including historic provision with the commercial sector, soft market testing and growth identified in the emerging Local Plan (2023)), has confirmed the need for three strategic area depots on, or adjacent to, major highway routes:

- North, adjacent to the A350 corridor;
- Centre, adjacent to the A350 corridor;
- South, close to the A303.

20. The locations must ensure close proximity to high work demand areas, with major routes to facilitate the quickest vehicle movements, and access to major conurbations to meet workforce requirements.

21. The timescales for delivery of the Council's depot provision are, in part, determined by service contract dates - Waste Collection Contract 2026 and Highways Contract 2032 - and the Council's Climate Commitment 2030.

22. The review considered a range of delivery options as detailed in Appendix 2. Specifically linked to funding, two primary options were assessed:

- Leasing - funded through the service revenue costs with contractors finding their own depots. This option was discounted as contractors would be forced to find and lease depots (due to only having a limited contract commitment) where commercial opportunities existed at the time of tender, and any infrastructure improvement would need to be recouped over the contract term. All the current services have tried a hybrid of this method, which has resulted in an overreliance on the contractors with such provision, stifling competition and the Council having to step in and find suitable locations (removing any benefits of this approach).
- Direct Council provision. This is the option that has been identified as delivering the best outcomes and allows long term strategic planning. Further, cost comparisons between the leasing and capital purchased direct council provision shows the council provision option delivers the most cost-effective outcome over the longer period. Ownership gives the council certainty and flexibility over the life of the Plan and it provides business continuity options for the services over the long term.

23. A review of the Council's land stock identified one site at Bowerhill Melksham that met the depot criteria. This is the area made up of the old Highway Depot, the redundant Christie Millar Leisure Centre site, the former golf course, the Household Recycling Centre and adjacent Council owned land. Whilst building a new depot on this location is unlikely to be delivered before the start of the new Waste Collection contract in 2026, it would allow the service to occupy the site in the early term of the contract subject to the grant of planning permission, the grant of any relevant statutory consents and the release of the restrictive covenants on the adjacent Council owned land. A landownership plan is attached at Appendix 4.

24. Part of the site is currently being used for the provision of highway services by Milestone (as had previously been the case), highlighting the lack of suitable alternative sites available to contractors in the central area.

25. The location would ensure business continuity for Highway services and allow the vast majority of waste vehicles currently operating out of Sands Farm in Calne to be relocated to Melksham, with the remaining vehicles being moved to the reinstated ex waste collection depot at Royal Wootton Bassett or alternative existing provision. This would remove the reliance on Hills Waste for vehicle storage on their land as all the waste vehicles could be stored on Council owned and controlled land, including the growth in vehicle numbers identified by the Waste Service.

26. Delivery of a central area depot on the Council's land at Bowerhill, Melksham, would facilitate the closure of the Riverway Depot, and Semington old Salt Store. Continued use of Kennet House as an operational depot is also being reviewed as part of this programme.

27. More detailed feasibility and business case work is required to consider the requirements and locations for strategic depots in the north and south of the county. In the interim, a number of short term improvements to the remaining council depots are required to ensure they remain fit for purpose in the short term (Appendix 3). However, these improvements will not enable the existing depots to meet future growth or deliver necessary operational and cost efficiencies.

28. This proposal requires a capital investment of £37.928m to deliver the new strategic depot on Council owned land in Bowerhill, Melksham, and to undertake the remaining depot improvements.

29. With the growth in waste vehicles, and the requirement for greater depot storage and waste management as detailed in Cabinet Agenda Item 9 – Waste Services Delivery Strategy, the annual revenue costs will increase on average by £0.370m. However, the costs are not a ‘like for like’ comparison with current budgets, as the new facilities have been fully costed to account for future service growth. The like for like comparison shows that three Council owned and operated depots deliver the most cost-effective provision.

30. Analysis of the costs avoided over the 30 year period for the central area depot in Melksham shows a total revenue cost avoidance of £8.931m and capital avoidance of £8.650m (not including inflation). These costs are avoided by reducing the number of sites, the footprint and removing the duplication of assets and their maintenance.

31. Other additional costs will be incurred without implementation of the strategy including:

- Council and contractor travel - if the electric infrastructure is not provided, other sustainable fuels will be required to meet the Council’s carbon neutral pledge. This will necessitate increased revenue expenditure over the current fossil fuel spend by an estimated 25% (based on Hydrogenated Vegetable Oil);
- Waste and Highways Service Contacts - reduced competition at the time of tender will result in higher tender priced submissions and over-reliance on single-suppliers;
- Ad-hoc costs of unplanned changes - for example, due to maintenance issues, the relocation of council and contractor staff to alternative accommodation; we have needed to relocate vehicle storage and faced increased costs of £320,000 rent per annum due to lost depot provision.

32. Programme

The table below illustrates how the council will deliver the strategically based area depots to enable efficient delivery of services.

Area	Interim Investment	Depot Disposal/ Cease	Owner	Comment	Target Date
Central area - Melksham		Riverway	WC		2026/ 27
		Semington	WC		2026/ 27

		Sands Farm, Calne	HWS		2026/ 27
		Kennet House	WC	Evolving use – operations or hub model	
	Royal Wootton Bassett	Sands Farm Calne	HWS	close when northern depot is built	2026/ 27
	Wilton		WC	close when southern depot is built	See below
	Churchfields		WC	close when southern depot is built	See below
	Bath Road, Chippenham		WC	close when northern depot is built	See below
South area				Subject to detailed business case	2030
North area				Subject to detailed business case	2032

33. Services to occupy the new central area (Melksham) is built will include:

Service	From
Waste	Sands Farm
Waste	Riverway
Waste	HRC Melksham
Local Highways	LH Melksham
Streetscene	Riverway
Fleet/Commercial Workshop	Riverway

Overview & Scrutiny Engagement

34. The Chairmen and Vice-Chairmen of Overview and Scrutiny Management Committee and Environment Select Committee will receive a briefing on this report.

Safeguarding Implications

35. There are no immediate safeguarding implications from this report.

Public Health Implications

36. A key element of the depot plan is to provide a base for public health related services to be delivered including waste collections and highway works.

37. New, fit for purpose, depot provision with retention of and improvements in facilities will enable those services to continue and mitigate the risk of failure in this area.

Procurement Implications

38. The improvement of facilities and disposal of surplus sites will require the necessary processes to be followed. Strategic Procurement will provide advice and guidance throughout the process.
39. Past experience and soft market testing has confirmed that the future procurement of services will benefit from the proposals with the increased opportunities for more effective competitive tendering.

Equalities Impact of the Proposal (detailing conclusions identified from Equality Analysis, sections 4 and 5)

40. None.

Environmental and Climate Change Considerations

41. The depot portfolio plays a part in ensuring that the Council's environmental obligations are fulfilled, including the disposal of waste and improvement / maintenance of amenities in Wiltshire. This paper's proposals will enable the Council to maintain the ability to deliver these obligations.
42. Improvement in the sustainable infrastructure for buildings and fleet resource will help the council achieve its carbon neutral commitment for 2030.
43. The council has a number of statutory functions to undertake, many of which require licencing from the Environment Agency. The proposal mitigates the risk that the Environment Agency will have concerns over the ability to licence sites.
44. Location of the depots is key to a successful portfolio, due to the need for cross county geographical service delivery. This proposal seeks to ensure that depots are strategically located throughout the county to enable efficient delivery of services, reasonable response times and minimise distances travelled to deliver services.

Risk Assessment

Risks that may arise if the proposed decision and related work is not taken

45. A failure to invest in facilities creates clear risks to the continuing delivery of services from depots and may result in the Council failing to meet its statutory obligations.
46. Service growth cannot be accommodated in the current depot provision.
47. The future procurement of services and the ability to invite competitive tenders from a wide range of providers will be at risk if the council does not have suitable, fit-for-purpose, well-located depot sites in the future.
48. Without a strategic approach with planned consolidation, future growth requirements will result in an ad hoc development programme and higher revenue and capital spending compared with the proposed three area based depot provision.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

49. The new waste contract will commence in 2026. It is unlikely that the timescales will allow for the proposed new central area depot in Melksham to be operational at that time. Mitigating actions, such as extending some of the current vehicle storage leases, will be undertaken.
50. Planning permission for the development may not be granted. Mitigating actions, such as early engagement with the local planning authority, will be undertaken.
51. The beneficiary of the restrictive covenants over the Council's adjacent land may not agree to the release of those covenants or require compensation for doing so. Mitigating actions, such as early engagement with the beneficiary of the covenants, will be undertaken.

Financial Implications

52. The Capital budget requirement for the central area depot is £37.928m; this is £32.619m for the depot and £5.309m to cover the immediate term requirements across central, south and north existing sites to cover health and safety, operational and resilience work. Approval of the £5.309m is required to allow the work to be undertaken as necessary based on essential needs assessment. The budget includes a 10% contingency and inflation uplift of 11% for 2024/25, 10% for 2025/26 and 2.5% thereafter.
53. It is recommended that the capital receipts generated from the sale of the existing sites at Semington, Devizes and Trowbridge (Riverway) are ringfenced to this programme. These are forecast at £1.870m, which would leave a borrowing requirement of £36.058m.
54. The revenue cost of borrowing would peak in 2028/29 at £2.167m per annum. This covers minimum revenue provision and interest payable. Minimum revenue provision has been allowed for the immediate term capital requirements in the year after investment and, from 2028/29, for the new central area depot based on it completing and being brought into use in 2027/28.
55. Asset life has been based on 50 years as per the Council's accounting policy. Interest has been allowed for at 100% of borrowing, which has been assumed at the end of each financial year. Interest rates are based on 5.4% for 2024/25, 3.9% for 2025/26 and 3.8% for 2026/27 and thereafter for 50 years. The actual borrowing costs will differ as this is treasury management decision and depends on the actual borrowing undertaken. The revenue cost of borrowing is unfunded so would be a pressure that would need to be addressed through the budget setting process, either by identifying savings, reducing current service spend or reviewing the existing capital programme and removing and reallocating £36m of borrowing funded schemes. The tables below summarise the capital investment and revenue cost of borrowing.

Capital Investment

	Total £m	2023/24 £m	2024/25 £m	2025/26 £m	2026/27 £m	2027/28 £m
Capital Investment Central Area Depot	32.619	0.293	6.243	10.483	11.143	4.457
Capital Investment Immediate Term Requirements	5.309	1.542	3.767	-	-	-
Total Capital Investment	37.928	1.835	10.010	10.483	11.143	4.457
Capital Receipts	1.870	-	0.620	-	-	1.250
Borrowing	36.058	1.835	9.390	10.483	11.143	3.207
Total Financing	37.928	1.835	10.010	10.483	11.143	4.457

Revenue Cost of Borrowing

	Total £m	2024/25 £m	2025/26 £m	2026/27 £m	2027/28 £m	2028/29 £m	2029/30 £m	Future Years
Minimum Revenue Provision	36.058	0.031	0.106	0.106	0.106	0.759	0.759	34.191
Interest	70.447	0.099	0.465	0.864	1.287	1.409	1.409	64.914
Total Revenue Cost of Borrowing	106.505	0.130	0.571	0.970	1.393	2.167	2.167	99.105

56. A high level review of operating costs has been undertaken and, ignoring normal inflation increases, is showing an average increase in operating expenditure of circa £0.360m per annum from 2027/28 in comparison to the existing revenue budgets for current sites and operations. A like for like comparison cannot be made as this phase has been designed with flexible infrastructure, it includes increased service requirements, allows for service growth and for the Council to deliver against commitments for Net Zero strategy, Fleet strategy and respond to the Environment Act. More detailed modelling will be required as the Waste service is defined to confirm this position, and the final pressure would need to be factored into future revenue budget setting.

Increase in Revenue Operating Costs

	2023/24 £m	2024/25 £m	2025/26 £m	2026/27 £m	2027/28 £m	2028/29 £m	2029/30 £m
Increase in Revenue Operating Costs	0.010	0.011	0.012	0.080	0.374	0.349	0.362

57. As with all Capital projects there is a risk that inflation will be higher than forecast, which could lead to increased costs. Consultants have undertaken due diligence and compared the forecast cost for the Depot strategy to similar programmes undertaken by other local authorities as part of a benchmarking exercise. In addition, an independent review has been undertaken by the Quantity Surveyor who supported the Council with the review of winter provision. The results of these reviews were that the costs, assumptions and approach were deemed to be reasonable.

58. The costs provided in this report are based on current assumptions and forecasts detailed above. There is a risk that interest rates could be higher in the future which would increase borrowing costs, capital receipts may not be generated which would increase borrowing requirement, and actual operating costs could be higher depending on the services and operations operated from the sites.

59. The co-development of business cases for delivery of depots in the north and south of Wiltshire mitigates risk in terms of external influences on service provision. Delivery of

the depots would be dependent on further capital investment which would be subject to separate Cabinet reports in line with phased delivery to meet service needs.

Legal Implications

Disposal of surplus sites

Section 123 (1) Local Government Act 1972

60. Wiltshire Council cannot dispose of its land for a consideration less than the best that can be reasonably obtained in the market, except with the express consent of the Secretary of State.
61. The power for the Secretary of State to give a general consent for the purpose of land disposals by local authorities is set out in section 128(1) of the LGA 1972. Specific consent is not required for the disposal of any interest in land that the authority considers will help it to secure the promotion or improvement of the economic, social or environmental well-being of its area.
62. Disposal at less than best consideration is always subject to the condition that the undervalue does not exceed £2 million. Therefore, all proposed transactions where the aggregate of "undervalue" exceeds the £2 million threshold will require the specific consent of the Secretary of State.
63. When considering the freehold transfer of the whole or part of a surplus site for less than the best that can be reasonably obtained in the market, the decision-making process should include a statement qualifying the economic, social or environmental well-being generated from the disposal. This should be quantified as much as possible to ensure that the General Consents Order requirements have been met.

Open Space Land Section 123 (2A) Local Government Act 1972

64. Should part of a surplus site consist of open space consideration should be had to the statutory duty to advertise its intention to dispose of open space land in a local newspaper for two consecutive weeks and to consider objections. This will need to be done before any final decision is taken on the disposal so that proper consideration is given to the responses that are received.

Contract and Procurement

65. Any procurement must be undertaken in accordance with the Council's Constitution (specifically Part 10 Contract Regulations) as well as the legal requirements under the Public Contracts Regulations 2015 or the Procurement Act 2023 (as applicable). A failure to do so may result in a challenge to the process or a delay to or abandonment of the process.
66. At the appropriate time relevant contracts should be entered into by the council.

Specific Legal Implications

67. Save as referred to in the body of the report and in this section, no specific legal implications arise from the proposals set out in this report. Should any additional legal implications arise in the future or as a consequence of the proposals set out in this report then legal advice will need to be sought at the relevant time.

Options Considered

68. Continuing with the current depot provision - this was discounted as the Council's current depot stock is either too small, located in areas with poor access, located in the wrong areas, does not have the required infrastructure and is not fit for purpose.
69. Undertaking improvements to the current depot stock in a planned programme, was also discounted as, due to the challenges detailed in paragraph 62, the provision has a greater cost than replacing with new depots over a 30 year period.
70. Leasing through contractors finding their own depots - this option was discounted as contractors would be forced to lease depots (due to only having a limited contractual commitment) where commercial opportunities existed at the time of tender and any infrastructure improvement would need to be recouped over the contract term. All the current services have tried a hybrid of this method which has resulted in an overreliance on the contractor provision and stifling competition and the council having to step in and find suitable locations (removing any benefits of this type of provision).
71. Cost comparisons between the leasing and capital purchase show the council owned provision delivers the most cost-effective outcome over the longer period.

Conclusions

72. To ensure that statutory services are secured for the future, in a manner that delivers best value, investment in the depot portfolio is required and this can be phased in line with increasing demand for services.
73. A three strategic area depots approach has been identified as the most effective way to meet the requirements of Highways, Streetscene and Waste services - located in the north, centre and south of the county. This also allows the opportunity for carbon reduction, operational and revenue expenditure efficiencies, the provision of an essential and flexible infrastructure to meet the council's future needs, whilst removing the council's dependencies on external suppliers.
74. The immediate need relates to depot provision in the central area, and the Council has a suitable site within its ownership at Melksham to deliver a new depot, allowing a number of other sites to be disposed of.
75. Cabinet is requested to endorse the report and recommend to Full Council to approve capital funding for delivery of a new strategic operational depot in Melksham, and for operational depot improvements in the remaining depots to mitigate risks, including those related to the waste management and highways contracts, and to meet climate change commitments for 2030.
76. Further work, and subsequent Cabinet approvals, will be required to confirm provision in the north and south of the county, including land assembly.
77. The Plan meets the objectives of the review and delivers the next phase of the outcomes detailed in the January 2020 Cabinet Report.

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6 November 2023

Background Papers

None

Appendices

Appendix 1 - Strategic Depot Review 2019

Appendix 2 - Options Analysis and programme costs

Appendix 3 - Short Term Depot Provision and Essential Requirements

Appendix 4 – Landownership Plan and Indicative Site Footprint
