Appendix F1

West Northamptonshire Council
Capital Strategy 2022-23 Onwards

1st February 2022

V02

1. Introduction

1.1. West Northamptonshire Council is committed to supporting its strategic vision by delivering a balanced budget, optimising the use of assets, and to help transform services so that they are sustainable for the future.

1.2. The Capital Strategy plays a vital contribution to the economic growth of West Northamptonshire and to the effective delivery of front line services. The Council recognises the importance of the Strategy in facilitating the achievement of the organisation's corporate priorities and how those priorities are derived from local, regional and national agendas.

1.3. COVID-19 has had an impact on the global, national and local economy and the full extent of the impact will not be known for some time. The delivery of the capital programme will help to ensure an effective economic recovery from the pandemic across West Northamptonshire.

1.4. The Council has a clear priority to address the Climate Change agenda and all capital investment proposals will be considered with this in mind.

1.5. The Capital Strategy is not just about finance, it is a whole organisational approach to effective, long term planning and investment for the benefit of our citizens.

1.6. However, affordability will be a key driver when assessing the Council's capital investment portfolio and the Authority's policy is to minimise the need for borrowing to fund capital schemes.

1.7. The Capital Strategy sets out the key objectives and broad principles to be applied by the Council when considering capital investment and its funding. It provides the context for how the Council's Medium Term Capital Programme seeks to support the realisation of the Council's vision and corporate objectives.

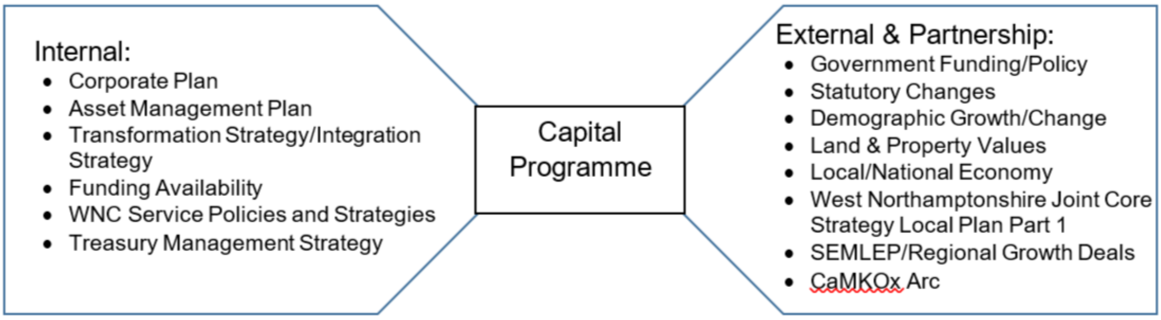
1.8. In support of the Council's vision and the budget commitment the key objectives for the Capital Strategy are as follows:

- The delivery of a Medium Term Capital Programme which is affordable and sustainable, ensuring that the Council's internal resources and application of external borrowing are utilised to fund capital expenditure where it supports the delivery of the Council's financial sustainability and where there are statutory requirements such as health & safety;
- New capital investment requests will be considered against their contribution to the achievement of the Council's strategic priorities, in particular any schemes that contribute to the Climate Change agenda and our 'Green and Clean' priority;
- External funding is prioritised against the areas of greatest need within West Northamptonshire, in the main supporting highways maintenance, the delivery of education places, the Housing Revenue Account, and economic development and regeneration within the county. In the current financial climate priority will be given to schemes that also deliver transformation and/or revenue savings;

- Maximisation of the use of the Council's assets, and where possible working with local partner organisations to maximise the efficiency of assets across the public sector and West Northamptonshire.

1.9. The updated Prudential Code and Treasury Management Code of Practice (both issued by CIPFA in December 2021) include new requirements in relation to the setting of a Capital Strategy that cover specific subject areas. In line with the Prudential Code, the aim of this Capital Strategy is to demonstrate how the Council will make capital expenditure and investment decisions in line with service objectives and properly take account of stewardship, value for money, prudence, sustainability and affordability. The Capital Strategy sets out the immediate to long-term context in which capital expenditure and investment decisions are made and ensures the Council will give due consideration to risk, reward, and impact on the achievement of priority outcomes.

1.10. The Council's Capital Programme is a key financial planning tool. It represents significant investment over the medium term in the acquisition or improvement of long-term assets such as land, buildings, infrastructure, and equipment and information technology. It is therefore set in the context of, and is shaped by, both internal and external strategic influences. The diagram below shows some of the key internal and external strategic influences on the WNC Capital Programme.



Local Government Reform

1.11. This strategy will continue to evolve as the processes for the WNC unitary authority become embedded in business as usual.

2. Governance

2.1. Governance covers the policies and frameworks related to capital expenditure and the processes and structures by which decisions are made to ensure that the Capital Programme is relevant, affordable, and sustainable.

General Fund Capital Programme Approval Process

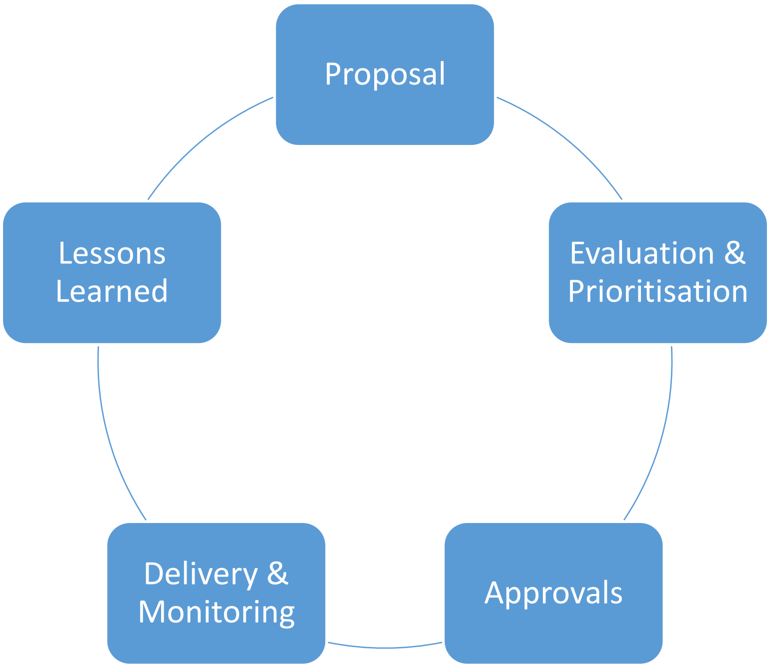
2.2. At vesting day, the approach taken for 2021-22 was to consolidate the sovereign councils' capital programmes into one capital programme for West Northamptonshire. This was felt to be a reasonable starting point to ensure that the Council's capital programme was 'safe and legal' from day one and has developed and evolved over the past 12 months.

2.3. During its first year, WNC has undertaken significant work to improve and enhance the capital planning, approval and monitoring processes, including the establishment of the Capital and Assets Board (see below) to ensure a robust capital programme with appropriate risk identification and mitigations.

2.4. The Capital Strategy sets out the Council's objectives in respect of its future capital programme plans and budget commitment and is presented to Council for approval as part of the Council's annual budget-setting process in February each year.

2.5. Services have been required to provide business case appraisals for any budget proposals for the medium term and these have been evaluated and prioritised through the agreed approval process.

2.6. Officers will be able to make an in-year bid through the completion of the relevant capital paperwork and successful progression through the approval process.



2.7. Service Managers bid as part of the annual budget setting process, and throughout the year, to include projects in the Council's Capital Programme. Finance collate the bids and calculate the financing cost. The Executive Leadership Team and Capital and Assets Board will then review and assess the bids by examining the project's contribution to service priorities and financing costs. Council receives the final proposed Capital Programme in February each year for consideration and approval.

2.8. Schemes move forward to delivery, becoming part of the Committed Capital Programme, following formal approval.

2.9. In accordance with the Council's Constitution, approval for in year capital bids is as follows:

- The Chief Finance Officer can approve new schemes estimated to cost less than £100k
- Cabinet may approve new schemes estimated to cost less than £500k
- New schemes estimated to cost more than £500k must be approved by Full Council

2.10. All schemes, regardless of value must be signed off by the Executive Leadership Team, the service portfolio holder and the Capital and Assets Board.

2.11. All additions to the capital programme will be formally reported to Cabinet through the Quarterly Capital Report.

2.12. The approval of funding agreements, e.g. developer contributions, which contractually commit the Council to undertaking to new capital schemes, (such as school builds), are required to follow the same approval process.

2.13. Each scheme must be under the control of a nominated budget/project manager and officers are not authorised to commit expenditure without prior formal approval for the scheme as outlined above.

2.14. All capital expenditure must be carried out in accordance with the Council's Constitution, Financial Regulations and Contract Procedure Rules, and must comply with the statutory definition of capital purposes as set out within Section 16 of the Local Government Act 2003.

Prioritisation

2.15. The Capital Strategy is key in helping the organisation meet its priorities, deliver service plans and provide front line services. As with every local authority, resources are finite, and the prioritisation of capital schemes is essential to ensure value for money and affordability. West Northamptonshire therefore prioritises capital bids on the following basis:

- To meet legal responsibilities such as contractual, health and safety and other regulatory requirements.
- To facilitate essential maintenance of WNC owned assets and the achievement of council priorities.

2.16. In particular:

- Fully funded schemes – are generally approved. However, due diligence must be employed throughout, including in the application for external funds.

2.17. Use of discretionary funds will be closely monitored and aligned to the categories highlighted below.

- Genuine statutory requirements, business critical projects and schemes to address urgent health and safety issues. This will include schemes to ensure the Council asset base remains safe, dry and warm (where appropriate). These schemes are generally approved, subject to a robust business case.

- Invest to save schemes / income generating schemes – are generally approved but will be subject to additional scrutiny prior to approval. Payback period and cost avoidance will be considered. All such schemes must clearly outline the costs of delivery and detailed savings assumptions.

- Part funded schemes – are assessed individually and approval will depend on the ratio of self-funding required, links to corporate priorities and risk assessment.

2.18. All remaining scheme requests are assessed individually based on the WNC prioritisation model which scores a scheme based on its achievement of corporate priorities and levels of funding required.

Links to Corporate Plan Priorities

2.19. The Council's Corporate Plan includes six key priorities and capital proposal requests will be assessed to determine the extent to which they meet our core objectives.

2.20. This is done using a prioritisation model designed by WNC. Contribution to these priorities will be monitored by Finance and reported periodically to the Capital and Assets Board.

2.21. The six priorities are:

1 Green and Clean
Environment & Wellbeing

- Carbon neutral by 2030
- Climate summit in first few months
- Increased wildlife species & more trees
- Increased electric charging & energy efficiency
- Vibrant towns & villages
- High quality parks
- Accessible green space for all

2 Improved Life Chances
Health, Social Care & Families

- Healthy, safe and protected Children
- Increased aspirations in young people
- Investment in new schools & provision
- Adults supported to live independently
- Care provided for those that need it
- Reduced hospital stays and delays
- Joined up and local services with health
- Safe and secure accommodation for all

3 Connected Communities
Transport & Connectivity

- Improved road, rail and bus networks
- Completion of major roads projects
- Improved road quality
- Increased use of electric vehicles & charging points
- Enhanced broadband and mobile connectivity

4 Thriving Villages & Towns
Place shaping & Homes

- Regeneration of our core town centres
- Safer communities with less anti social behaviour
- Flourishing and supported small business
- Sustainable planning for growth
- Increased affordable housing & Council homes
- Raised standards of privately rented homes

5 Economic Development
Growth & Prosperity

- Published west strategic infrastructure plan
- Framework for long term economic growth
- Increased inward investment
- Building on our rich heritage
- Increased visitors to our attractions
- Infrastructure benefits and investment through our role in regional forums and plans

6 Robust Resource Management
Transparency & financial probity

- Council tax rises capped at £99 a year
- Stable finances and rainy day reserves
- Robust scrutiny of spending
- Open and transparent decision making
- Financial prudence underpinning long term decisions and plans
- Optimised debt management

Housing Revenue Account (HRA) Capital Programme

2.22. For schemes that are not approved as part of the annual process, but are brought forward during the year, financial appraisals are submitted to Finance and the Assistant Director of Housing for review to seek approval through the Capital and Assets board and Executive.

2.23. The HRA Capital projects approval process is under review by the Housing Service. This review will be conducted by the Assistant Director of Housing in liaison with NPH and with the Director of Finance.

Virements

2.24. The Council's General Fund capital governance arrangements permit virement of funding from one capital scheme to another.

2.25. Approval levels for General Fund virements are set out in the Financial Procedure Rules, i.e.

- Virements up to £100,000 cumulative requires CFO approval
- Virements between £100,000 and £500,000 require agreement by the CFO in consultation with the relevant Cabinet Portfolio Holder
- Virements in excess of £500,000 require Cabinet approval

2.26. The HRA capital governance arrangements allow for virements and the management agreement with NPH sets out the HRA governance arrangements on the capital programme managed budgets. Virement requirements for the HRA are as set out in the Management Agreement with Northampton Partnership Homes.

Assessment of the Revenue Implications of Capital Investment

2.27. In the interests of properly evaluating the affordability of a general fund project, the revenue implications of capital bids are also included on the Business Case pro-forma, which the Capital and Assets Board receives as part of the review and challenge process. This ensures that an evaluation can be made on the overall financial business case of the capital project (revenue and capital cost/savings). It also ensures capital and revenue budgeting are aligned for financial planning purposes.

Slippage

2.28. Where a project has been delayed for any reason, and the full budget has not been spent at the year-end as a result but is still required in order to complete the project, slippage of the budget can be requested. Proposals for slippage will be brought to Cabinet for approval annually following the year-end closure of capital. Amendments to slippage may be required should the audit of the final accounts result in changes to the spend on a capital scheme in any year, for example if a material change to a year end accrual is required. In the event this is necessary, the change to the slippage will be reported to Cabinet for information.

Capital and Assets Board

2.29. The overarching objective for the Board is to review and challenge capital schemes in order to be able to recommend to Cabinet that they move from the planning stage into delivery.

2.30. The purpose of the Capital and Assets Board is to:

- Provide visible leadership in relation to the implementation of the Capital Strategy.
- Ensure funding is confirmed, secure and wherever possible received fully in advance of works commencing/being approved and that responsibility for this is taken by the project manager.
- Monitor performance against the Council's agreed capital discretionary funding levels.
- Escalate concerns and issues to the Executive Leadership Team.
- Optimise the funding for schools' capital projects.
- Ensure other reporting and approval requirements have taken place, in line with the Constitution, particularly in respect of schemes outside of the agreed Capital Strategy over £100k.
- Ensure that the revenue implications of all capital schemes are taken into consideration and that options appraisals have been carried out/considered.

Risk Management Governance

2.31. There are many types of risk in relation to the Capital Strategy and delivery of the Capital Programme. These include, but are not limited to:

- Cost Risk – Can the project be delivered within the budget set?
- Quality Risk – Will the scheme be delivered to the required standard as remedial works could lead to more costs and poor quality can have an adverse impact on service delivery?
- Timeliness – Will the project be started or delivered on time? Delays and slippage can have service implications and lead to increased costs.

2.32. The Council will seek to identify, assess and prioritise the risks it faces, and wherever practicable, it will manage and control risks to maximise the delivery of its policy objectives and desired outcomes and deliver projects on time and on budget. However, it is appreciated that sometimes the only option is to accept a risk.

2.33. As part of the business case, contingencies will be included as part of the budget costing exercise and expected costings for similar schemes will be considered as a benchmark. These will cover ordinary, but not extraordinary, risks/changes to the cost of delivering the project. Project Managers will be responsible for undertaking effective risk management for their projects and will report pressures outside of this through the monthly reporting to Cabinet and project closure reports will be utilised to provide learning for future schemes.

Knowledge and Skills

2.34. The Council aims to ensure that all staff have the appropriate skills and knowledge to perform their roles. Where the necessary expertise is not available in-house the Council will procure the skills and knowledge it requires from advisors or consultants.

2.35. The Council will work with its external auditors in relation to changes to technical accounting requirements and/or treatment.

2.36. The Council has arrangements in place to deliver legal advice. Where a particular legal speciality is required specialist legal advice may be procured.

2.37. The Council will adopt a list of 'Approved Contractors' who it will utilise to support capital projects to ensure preliminary surveys & works identify risks around costs and delivery in relation to the land, buildings, etc. elements for each project before main contracts are procured.

2.38. The Council will undertake background checks to ensure all contractors are suitably qualified, have a proven delivery background in similar projects before awarding contracts.

2.39. The Council will take its advice from its external treasury partners/advisors in making decisions related to its Treasury Strategy.

2.40. The Prudential Code Guidance highlights the importance of those charged with governance having the skills and knowledge to "ensure that decisions can be properly debated and understood, and scrutiny functions can be effective".

2.41. All elected members will have a finance induction session when first elected in order to give them an overview of the Authority's finances, their roles and responsibilities. This will be complemented by annual member training sessions, which are offered to all members, covering all the key aspects of local government finance, funding, budgeting and council tax setting.

2.42. The level of skills and expertise available to the Council described above is considered to be appropriate in relation to the risk appetite set out in section 7; and opportunities are available to enhance these skills, should it be deemed necessary.

3. Capital Programme and Financing

3.1. In England and Wales, there are three routes by which expenditure can qualify as capital under the prudential framework:

- The expenditure results in the acquisition, construction or enhancement of fixed assets (tangible and intangible) in accordance with 'proper practices'. Fixed assets are those with a useful economic life of more than one year.
- The expenditure meets one of the definitions specified in regulations made under the 2003 Local Government Act.

- The Secretary of State makes a direction that the expenditure can be treated as capital expenditure.

3.2. The Council's capitalisation policy looks to capitalise expenditure on eligible items with a cost over £10,000 in relation to a single item or in relation to a large quantity of smaller value items. In Local Government this can also include spending on assets owned by other bodies, as well as loans and grants paid over to other bodies for the purchase of assets or other qualifying capital expenditure.

3.3. The IFRS16 reporting standard is due to come into effect for local authorities from 1 April 2022 requiring that the majority of leases are treated as finance leases (whereby the principal element of the lease must be treated as capital expenditure). There is an exemption available for low value leases for which the threshold should be set at a level, which the commentary to the standard describes as allowing small items of IT to fall within the exemption, but requiring activities such as vehicle purchases to be accounted for under IFRS16. To comply with this requirement, the threshold for IFRS16 is set at £10,000 for WNC.

General Fund Capital Programme

Capital Programme Expenditure Budget

3.4. The Council's Medium Term Capital Programme (MTCP) shows the committed expenditure on schemes that have been approved by Full Council.

3.5. The table below sets out the GF Capital Programme expenditure budget which will be submitted for approval by Full Council as part of the budget setting process.

3.6.

Base as reported to Full Council in February 2022.

Revised capital programme summary as at February 2022	**2022/23 £k**	**2023/24 £k**	**2024/25 £k**	**2025/26 onwards £k**	**Total £k**
Adults, Communities and Wellbeing	9,672	7.575	7,557	4,700	29,504
Children's	12,091	3,950	3,750	0	19,791
Children's Trust	2,283	1,172	0	0	3,455
Corporate	3,016	296	56	50	3,418
Finance	554	0	0	0	554
Place	64,084	35,141	17,317	7,961	124,503
Total	**91,700**	**48,134**	**28,680**	**12,711**	**181,225**

Major Scheme Details

3.7. Below are the larger schemes (in excess of £10m) within the Council's current committed programme. Some schemes are already in delivery and will complete over the course of the plan period, others will commence over the medium term:

Scheme	Details	Funding	Project Type	Forecast Completion Year
North West Relief Road	Scheme to help unlock the delivery of the Northampton Northern Orbital Road.	Borrowing S106 CIL	Highways Infrastructure	2027-28
Community Equipment	Scheme to provide equipment within the community.	Borrowing External contribution	Joint social care project with Health and North Northamptonshire Council	2025-26 (likely to be ongoing)

Committed Capital Programme Funding

3.8. All capital expenditure must be financed. This could be from a single source or a combination of:

- external sources (government grants and other contributions);
- the Council's own resources (revenue, reserves and capital receipts);
- debt (borrowing, leasing and Private Finance Initiative)

3.9. Prudential Borrowing (Council Discretionary Funding) - The introduction of the Prudential Code in 2004 allowed the Council to undertake unsupported borrowing itself. This borrowing is subject to the requirements of the 'Prudential Code for Capital Expenditure for Local Authorities'.

3.10. Total Council investment, (discretionary funding, ring-fenced capital receipts and gap funding) accounts for £73.4m, (42.5%), of the overall committed Capital Programme over the plan period.

3.11. The summary table below shows the funding for the General Fund Capital Programme across current and future years and the funding sources.

WN Revised Capital Financing as at February 2022	2022/23 £k	2023/24 £k	2024/25 £k	2025/26 onwards £k	Total £k
Capital receipts	8,799	739	809	50	10,397
Prudential Borrowing	39,229	8,983	4,145	9,068	61,425
Internal Borrowing	400	365	355	0	1,120
S106**	2,101	6,119	3,750	0	11,970
Community Infrastructure Levy (CIL)**	3,921	14,117	1,000	393	19,431
Grant Funding	32,376	13,995	8,321	0	54,692
Funded from Reserve	292	0	0	0	292
Revenue Funding	647	0	0	0	647
External Funding	3,935	3,816	10,300	3,200	21,251
Total Funding	**91,700**	**48,134**	**28,680**	**12,711**	**181,225**

Housing Revenue Account Capital Programme

HRA capital expenditure budget

3.12. The table below shows the HRA expenditure budget for the period.

	Budget 2022-23	Estimate 2023-24	Estimate 2024-25	Estimate 2025-26	Total
	£k	**£k**	**£k**	**£k**	**£k**
External Improvements	20,430	5,950	9,700	8,500	44,580
Internal Works	2,250	2,250	2,250	2,250	9,000
Structural Works and Compliance	450	450	450	450	1,800
Disabled Adaptations	1,500	1,270	1,270	1,300	5,340
Environmental Improvements	2,788	2,788	2,788	2,788	11,150
IT Development	496	483	430	395	1,804
New Build Programme/Major Projects	41,558	51,601	33,631	20,900	147,690
Buybacks and Spot Purchases	2,500	2,500	2,500	2,500	10,000
Total Capital Programme	**71,971**	**67,292**	**53,019**	**39,083**	**231,364**

3.13. Funding for the HRA for the period is shown in the table below.

	Budget 2022-23	Estimate 2023-24	Estimate 2024-25	Estimate 2025-26	Total
FINANCING:	**£k**	**£k**	**£k**	**£k**	**£k**
Major Repairs Reserve/Depreciation	13,500	13,500	13,500	13,500	54,000
Capital Receipts - RTB (excl 1-4-1)	3,192	3,192	3,192	3,192	12,768
Capital Receipts - RTB 1-4-1 Receipts	3,100	3,900	8,300	6,300	21,600
Capital Receipts - Grant Funding	11,408	4,000	4,000	0	19,408
Revenue/Earmarked Reserve	1,238	1,492	1,898	2,752	7,380
Borrowing / CFR	39,533	41,208	22,129	13,338	116,208
Total Financing - HRA	**71,971**	**67,292**	**53,019**	**39,083**	**231,364**

4. Funding Sources and Future Grant Allocations

External Funding

Section 106 (S106), Community Infrastructure Levy (CIL) and External Contributions.

4.1. Elements of the Capital Programme are funded by contributions from private sector developers and partners. These contributions relate to developments in the West Northamptonshire area and are agreements by negotiation based on the impact on the public sector infrastructure requirements that are forecast to occur because of increased activity/population bought by the development. Growth in West Northamptonshire has resulted in S106 contributions from developers accounting for significant elements of funding.

Grant Funding

4.2. The largest form of capital funding comes through external grant allocations from central government departments, (DFT & DFE). Although these grants are to support specific areas of investment the Government removed capital ring-fencing in 2010, enabling local authorities to prioritise grants to support local needs, pressures and statutory responsibilities. However, need and reporting requirements do limit the Council's ability to work to these more flexible rules. Also, the increase in the Free School Programme the Council loses some of its flexibility as these schemes are usually funded and managed directly by the DFE.

4.3. There are some specific grants such as Local Growth Fund (LGF) that must be bid for but a difficulty with this type of grant in the current climate can be the requirement to provide match funding.

4.4. There are five main aspects to the Department for Education Capital Grant Settlements, which are Basic Needs, Schools Condition Allocation (SCA), SEND (Special Educational Needs and Disabilities) Capital Grant, Healthy Pupil Premium and Devolved Formula Capital (DFC). The DFC is passported directly to schools to enable them to invest in ICT, minor repairs, etc.

Regional Growth Deals (including Local Growth Fund)

4.5. Growth Deals bring together housing, infrastructure and other funding in a single pot put into local hands, via the Local Enterprise Partnerships (LEPs), to realise growth, jobs and educational opportunities.

Internal (Discretionary) Funding - borrowing and capital receipts.

Revenue Funding

4.6. The Council can use revenue resources to fund capital projects on a direct basis. However, given the current financial position no revenue contributions will be utilised to support capital expenditure. Savings generated directly as a consequence of capital investment (Invest to Save) will be reported through revenue monitoring.

Capital Receipts

4.7. The Council is able to generate capital receipts through the sale of surplus assets such as land and buildings. These capital receipts can be used to reduce the Council's borrowing liability and be reinvested in the Capital Programme. Alternatively, they can be utilised either within the rules for the current Flexible Use of Capital Receipts guidance to support transformation. West Northamptonshire will prioritise the use of capital receipts for transformation projects.

4.8. The reason the receipts are referred to as potential is because, excluding the remainder of the Northampton Schools reorganisation sites, Strategic Land Holdings (SLH) remain the only area of sizeable asset ownership under the Council's control. However, predicting the timescales and values of receipts on these areas is problematic due to the complex nature of these sites and the multiple interests of partners, developers and local interest groups.

4.9. The potential optimal strategy in relation to reuse of property assets for service delivery, sale for development of housing and potential use by a wider public sector partners will be considered in relation to each individual site through the Place Shaping and One Public Estate strategies.

HRA Capital Funding

4.10. In addition to grant funding, borrowing, revenue funding, and HRA capital receipts, the HRA has access to its major repairs reserve for funding its capital programme.

4.11. Requirements for capital financing to be affordable, sustainable and proportionate also apply to the HRA. While there is no requirement to make an HRA minimum revenue provision, there is an option to make a voluntary revenue provision, should it be deemed necessary or prudent in the future.

Flexible Use of Capital Receipts

4.12. The Spending Review 2015 and its extension announced that to support local authorities to deliver more efficient and sustainable services, the government will allow local authorities to spend up to 100% of their fixed asset receipts over the period 2016-17 to 2021-2022 on the revenue costs of transformation projects. The Government announced on 10 February 2021 that the flexibility would be extended for a further three years until the end of the financial year 2024-25.The Council intends to take advantage of this concession to use capital receipts in more innovative ways and target disposal receipts where need is greatest.

Long term funding challenges

4.13. The Council faces a number of challenges in its future funding of the Capital Programme:

- The Council has limited levels of future capital receipts.

- 32.7% of the Council's GF capital funding comes from central government grants. Note: this percentage does not include DfE or DfT grants as this information is currently unavailable.
- A further 17.8% of the Council's capital funding comes from external contributions, largely S106 which is dependent on development in the county and the economy.
- The risk of general interest rate rises will need to be considered in relation to future borrowing requirement.

4.14. The Council only has limited influence over the external and grant funding sources and the Council's Capital Programme will continue to be largely influenced by central government policy.

Gap funding through discretionary borrowing

4.15. These types of schemes require short term funding from the Council to invest in infrastructure that will unlock development, which then releases the CIL/S106/business rates, etc., which can then repay the investment. The developments enabled will also provide wider economic benefits such as jobs and housing.

4.16. This investment increases the Council's short-term financing costs, but West Northamptonshire Council is compensated by the long-term financial and non-cashable benefits.

4.17. Where these arrangements form part of a business case, the level of gap funding in relation to the overall scheme need and benefits will be considered as part of the risk evaluation.

5. Commercialisation and Proportionality

Overview

5.1. The practice of investing in property in order to create an additional revenue stream to support service delivery and financial sustainability during a time of reducing settlements from central government has been widely adopted by local authorities. This authority has a number of investment properties that transferred from the pre-unitary authorities that it holds for this purpose.

5.2. Central Government have expressed concern at the risk of such investments and have put new regulations in place to minimise exposure for taxpayers.

5.3. However, if the Council were to consider adding other commercial projects, any such investment would be required to meet the following criteria:

- It should limit the Council's exposure to specific market sectors.
- It should not be a speculative development.
- It should not be in areas within Flood Zone 3 or with high land contamination risk.

5.4. Monitoring would be required to ensure a diverse portfolio and the target portfolio would normally be required to generate at least an average 3% net yield once fully invested but accept a variation from this yield when considering individual properties so as to allow for a spread of risks.

5.5. The Council will consider investing in property that generates an income stream for service purposes such as economic development, job creation, or regeneration. Appropriate service related targets will be developed and monitored by the service to ensure that the service outcomes are achieved in such cases.

PWLB and Commercial Activity

5.6. The HM Treasury ran a consultation on the future lending terms of the Public Works Loan Board (PWLB) between March and July 2020. The aim of which was to develop a proportionate and equitable way to prevent local authorities from using PWLB loans to buy commercial assets primarily for yield, without impeding their ability to pursue service delivery, housing, and regeneration under the prudential regime as they do now.

5.7. The outcome is that, from November 2020, PWLB will no longer lend to local authorities who wish to borrow funds to purchase commercial assets primarily for yield in their medium term capital programmes. PWLB loans will still be available to all local authorities for refinancing. In order to borrow from the PWLB, local authorities will now be required to submit a summary of their planned capital spending and PWLB borrowing for the following three years including a commentary providing more detailed explanation of the expenditure plans of the Council.

5.8. PWLB has defined the allowable activities as follows:

- Service spending is activity that would normally be captured in the following areas in the DLUHC Capital Outturn Return (COR): education, highways & transport, social care, public health, culture & related services, environmental & regulatory services, police, and fire & rescue services.
- Housing activity normally captured in the HRA and General Fund housing sections of the COR, or housing delivered through a local authority housing company. This is given separately from ‘service spending’ because of the relative concentration of cross-subsidy and other innovative financing arrangements in housing projects.
- Regeneration projects would usually have one or more of the following characteristics:
    a. the project is addressing an economic or social market failure by providing services, facilities, or other amenities that are of value to local people and would not otherwise be provided by the private sector
    b. the local authority is making a significant investment in the asset beyond the purchase price: developing the assets to improve them and/or change their use, or otherwise making a significant financial investment
    c. the project involves or generates significant additional activity that would not otherwise happen without the local authority’s intervention, creating jobs and/or social or economic value

d. while some parts of the project may generate rental income, these rents are recycled within the project or applied to related regeneration projects, rather than being applied to wider services

- Treasury management covers refinancing or extending existing debt from any source, and the externalisation of internal borrowing.

5.9. The Council will carefully consider these criteria when prioritising capital projects against the strategic objectives and ensuring affordability and the borrowing position are clear should any decisions be affected.

Commercial Activity – Approval and Scrutiny

5.10. All new commercial projects, whether property or service based, require approval in line with the governance processes set out in section 2 of this Strategy.

5.11. In respect of scrutiny of service based commercial activity members receive an Annual Report on Council Linked Entities. This will cover activities such as West Northamptonshire Norse Ltd (formerly Daventry Norse Ltd), The Daventry Estate Company Ltd (TDECL), PSP Daventry LLP and DDC Operations Ltd, the latter two of which are not currently active.

5.12. Income from existing commercial properties is managed, monitored and scrutinised as part of the revenue budget monitoring, while asset condition and viability fall within the remit of the Property Asset Management Plan.

HRA Commercial Activity

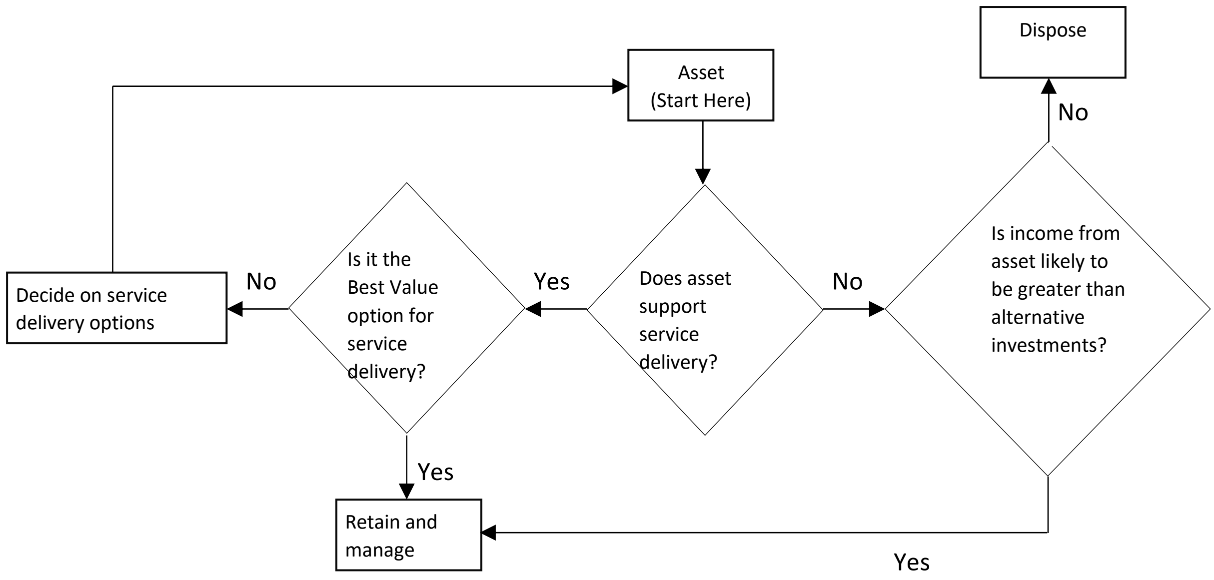
5.13. The HRA does not engage in commercial activity solely for the purpose of generating a profit.

5.14. The HRA owns a property, which has a floor currently rented out on a commercial lease to Northampton Dialysis Service. The plan is to develop the remainder of the property for housing. It also owns a number of estate shops with housing above and some garages.

6. Links with the Asset Management Plan

6.1. West Northamptonshire is a new authority and is in the process of preparing its Asset Management Plan. The Asset Management Plan has a strong link to the Capital Programme, due to the capital needs it generates in terms of property acquisition and major works. While surveys, repairs and maintenance are revenue expenditure under regulations, major works, acquisitions, and new builds are key drivers of capital expenditure, and are therefore an important strategic influence.

6.2. The asset management cycle is a key contributor to capital receipts income. An overview of the cycle is set out below.



7. Risk

7.1 Risk appetite in this context is the level of risk that the Council is prepared to accept or be exposed to at any point in time in relation to its activities. It involves knowing what risks the Council wishes to avoid, what risks it is willing to accept and what risks it is willing and able to manage (including by transferring them to a third party, e.g. through insurance).

7.2 The Council is willing to accept and manage the risks outlined in Appendix F1 (c) in respect of commercial property, provided that the business case and risk assessments for the project put the level of risks within acceptable and manageable margins. However, it will not knowingly enter into a commercial lease agreement with an unsuitable tenant (risk d).

7.3 In addition, the lease terms used for the commercial property include clauses that enable the Council to take action in the event that it discovers that it has inadvertently entered into a lease agreement with an unsuitable tenant.

7.4 The risks will be monitored and managed financially and operationally in accordance with council processes, and the financial performance will be reported on a monthly basis as part of the budget monitoring.

7.5 The Council is willing to accept the risks set out in this Strategy for projects in the Capital Programme, provided that the project management ensures that appropriate mitigations are put in place to bring the project within acceptable risk margins.

7.6 A summary of Capital Programme risks and Commercialisation risks is set out at Appendix F1 (c)

7.7 In respect of the Council’s commercial property investments risks in respect of a downturn in the property market and a loss of material tenants have risen significantly due to the Covid-19 pandemic and the impact of this on the national and global economy.

8. Debt and Borrowing and Treasury Management

Treasury Management Strategy

8.1 The purpose of the Treasury Management Strategy is to establish the framework for the effective and efficient management of the Council's treasury management activity, within legislative, regulatory, and best practice regimes, and balancing risk against reward in the best interests of stewardship of the public purse.

8.2 The Treasury Management Strategy incorporates:

- The Council's capital financing and borrowing strategy for the coming year;
- The Council's policy on the making of Minimum Revenue Provision (MRP) for the repayment of debt, as required by the Local Authorities (Capital Finance & Accounting) (Amendments) (England) Regulations 2008;
- The Affordable Borrowing Limit as required by the Local Government Act 2003;
- The Annual Investment Strategy for the coming year as required by the MHCLG revised guidance on Local Government Investments issued in 2018.

8.3 The strategy takes into account the impact of the Council's Medium Term Financial Plan (MTFP), its revenue budget and Capital Programme, the balance sheet position and the outlook for interest rates.

8.4 The Council takes advice from its external treasury partners/advisors in making decisions on the current financial climate and markets in relation to whether to undertake short-term or long-term borrowing and in considering the management of its financial balances.

8.5 The tables in section 3 of this Strategy show the Council's funding commitment and sources in relation to the current Capital Programme.

8.6 Discretionary funding commitments are either financed through capital receipts or borrowing. Any borrowing undertaken must eventually be repaid and this can come from a single source or a combination of the following sources:

- Annual set aside provision of revenue resources (known as Minimum Revenue Provision [MRP]) This represents the repayment of the original debt over the assessed life of the asset;
- Capital receipts from sale of assets.
- In specific cases receipt of the external funding where there are timing differences between project delivery and the associated income being received (e.g. CIL and s.106).

8.7 The Council's cumulative amount of debt financing outstanding is measured by the Capital Financing Requirement (CFR). This increases with new debt-financed capital expenditure and reduces as MRP and capital receipts are used to replace it. The CFR is one of the prudential indicators that will be set in the Treasury Management Strategy Statement.

8.8 Table 1 - Prudential Indicator: Estimates of Capital Financing Requirement

CFR	2021-22 Estimate £m	2022-23 Estimate £m	2023-24 Estimate £m	2024-25 Estimate £m	2025-25 Estimate £m
Non-HRA	833	870	874	875	879
HRA	250	289	331	353	366
Total CFR	**1,083**	**1,159**	**1,205**	**1,228**	**1,245**
Net financing need for the year	50	80	49	26	22
MRP	-3	-3	-3	-4	-4
Movement in CFR	**47**	**77**	**46**	**22**	**18**

Borrowing

8.9 The Council's primary objective when borrowing money is to achieve a low but certain cost of finance while retaining flexibility should plans change in future. It will ensure that all borrowing is affordable and sustainable. These objectives are often conflicting, and the Council therefore seeks to strike a balance between:

- Lower cost short-term loans
- Higher cost long-term loans
- Fixed but certain interest rates
- Variable but reactive interest rates

8.10 Statutory guidance states that debt should remain below the Capital Financing Requirement except in the short-term. As demonstrated above, the Council expects to comply with this requirement over the medium-term horizon.

8.11 The Council's MRP Policy is included in its Treasury Management Strategy.

Prudential Indicators

8.12 The Council is obliged to set prudential indicators to help manage its capital financing and borrowing activities efficiently and wisely. The Treasury Strategy sets out two key borrowing indicators in particular.

8.13 Table 2 – Operational Boundary Prudential Indicator. This is the limit which external borrowing is not normally expected to exceed. All things being equal, this could be a similar figure to the CFR, but may be lower or higher depending on the levels of actual borrowing undertaken as impacted by the level of current and future cash resources and the shape of the interest rate yield curve. This also acts as a warning indicator should debt approach the legal limit.

Operational Boundary	2021-22 £m	2022-23 £m	2023-24 £m	2024-25 £m
Borrowing	800	850	850	850
Other Long Term Liabilities	0	0	0	0
Total	**800**	**850**	**850**	**850**

8.14 Each year, the Council is legally obliged to set an Affordable Borrowing Limit (also termed the Authorised Limit for External Debt) as set out in Table 3 below. This is the maximum limit of borrowing allowed and should not be exceeded.

Affordable Limit	**2021-22 £m**	**2022-23 £m**	**2023-24 £m**	**2024-25 £m**
Borrowing	850	900	900	900
Other Long Term Liabilities	0	0	0	0
Total	**850**	**900**	**900**	**900**

Financing

8.15 Although capital expenditure is not charged directly to the revenue budget, the consequential impact is. Interest payments to service loans borrowed and MRP contributions are charged to revenue, offset by any investment income receivable. This net annual charge is known as a financing cost.

8.16 Table 4 – Prudential Indicator: Proportion of Financing costs to Net Revenue Stream

Financing Costs to Net Revenue Stream	**2022-23 Budget**	**2023-24 Budget**	**2024-25 Budget**	**2025-26 Budget**
Non-HRA				
Net Financing Costs £m	12.065	13.122	12.582	12.800
Net Revenue Stream £m	326.570	342.203	344.968	365.311
Proportion of Financing costs to Net Revenue Stream (%) Non-HRA	**3.69%**	**3.83%**	**3.65%**	**3.50%**
HRA				
Net Financing Costs £m	8.802	9.792	10.408	10.742
Net Revenue Stream £m	56.452	58.181	59.781	61.561
Proportion of Financing costs to Net Revenue Stream (%) HRA	**15.59%**	**16.83%**	**17.41%**	**17.45%**

8.17 Due to the very long-term nature of capital expenditure and financing decisions, there are revenue impacts for years into the future.

Appendix F1 (a) – MRP Policy Statement

1 Policy Statement Introduction

1.1 The Council is required to repay an element of the accumulated General Fund capital spend each year (Capital Financing Requirement - CFR) through a revenue charge (Minimum Revenue Provision - MRP), although it is also allowed to undertake additional voluntary payments if required.

1.2 The Department for Levelling Up, Housing and Communities (DLUHC) have issued regulations that require full Council to approve an MRP Statement in advance of each year. Various options are available to councils in the guidance with the underlying principle that a prudent provision is made.

2 NCC Historic Debt Liability accumulated to 31st March 2007 (Transferred to WNC)

2.1 Until 2014/15, this element of the annual provision was calculated using Option 1 of the Guidance, the "Regulatory Method", which based the calculation on 4% of the Capital Financing Requirement on a reducing balance basis.

2.2 A change in this policy was introduced in and applied from 2015/16 onwards for historic debt liability, whereby the provision calculation was changed to an annuity calculation methodology, allowable under the Guidance.

2.3 A further change in this policy was introduced in and applied from 2017/18, whereby the annuity method calculation methodology was backdated to apply from 2007/08 onwards. This recalculation when compared against actual MRP charges identified an amount of overprovision, which has been applied prospectively from 2017/18 onwards until fully exhausted. This approach was permissible at the time in line with the 2012 guidance and anticipated 2018 change in guidance. It is no longer permissible under the 2018 statutory guidance.

3 NCC Debt Liability accumulated from 1st April 2007 (Transferred to WNC)

3.1 Up until 2016/17, capital expenditure incurred from 1st April 2007 onwards MRP was provided for under Option 3 of the Guidance, based on the estimated useful life of the assets and using an equal annual instalment method. MRP was charged from the year after the assets funded became operational

3.2 A change in this policy was introduced in and applied from 2017/18, whereby the MRP calculation was changed to an annuity calculation methodology backdated to apply from 2007/08. This recalculation when compared against actual MRP charges identified an amount of overprovision, which will be applied prospectively from 2017/18 onwards until fully exhausted. Again, this approach was permissible at the time in line with the 2012 guidance and anticipated 2018 change in guidance. It is no longer permissible under the 2018 statutory guidance.

4 NBC Debt Transferred to WNC

4.1 MRP relating to the historic debt liability incurred for years up to and including 2007/08 were charged at the rate of 4% on the reducing balance, in accordance with option 1 of the guidance, the “regulatory method”.

4.2 The debt liability relating to capital expenditure incurred from 2008/09 onwards was subject to MRP under option 3, the “asset life method”, and was charged over a period that is reasonably commensurate with the estimated useful life applicable to the nature of expenditure, using the equal annual instalment method. For example, capital expenditure on a new building, or on the refurbishment or enhancement of a building, was related to the estimated life of that building.

4.3 Estimated useful life periods were determined in line with accounting guidance and regulations. To the extent that expenditure is not on the creation of an asset and is of a type that is subject to estimated life periods that are referred to in the guidance, the Council generally adopted these periods. However, the Council reserved the right to determine useful life periods and prudent MRP in exceptional circumstances where the recommendations of the guidance would not be appropriate.

4.4 From 1st April 2021 West Northamptonshire Council will apply the MRP Policy already in place for the former NCC to all outstanding debt liability as measured by the Capital Financing Requirement (CFR), including that inherited from NBC as well as NCC. In relation to that inherited from NBC, the 2018 DLUHC statutory guidance (para 27-29) prevents the retrospective calculation of over provision of MRP when changing the methodology of calculation. The new methodology has been applied prospectively to outstanding debt liability inherited from NBC.

5 Debt Liability accumulated from 1st April 2021

5.1 For unsupported capital expenditure incurred from 1st April 2007 onwards, MRP will be charged from the year after the assets funded have become operational.

5.2 The Council will charge MRP on an annuity basis. The annuity rate will be determined by reference to the PWLB borrowing rate for the period equivalent to the life of the asset, measured at the point at which the asset becomes operational.

5.3 Estimated useful life periods will be determined under delegated powers. To the extent that expenditure is not on the creation of an asset and is of a type that is subject to estimated life periods set out in the guidance, these periods will generally be adopted by the Council. However, the Council reserves the right to determine useful life periods and prudent MRP in exceptional circumstances where the recommendations of the guidance would not be appropriate.

5.4 As some types of capital expenditure incurred by the Council are not capable of being related to an individual asset, asset lives will be assessed on a basis that most reasonably reflects the anticipated period of benefit that arises from the expenditure. Whatever type of expenditure is involved, it will be grouped together in a manner that best reflects the nature of the main component of expenditure with substantially different useful economic lives.

5.5 The Council reserved the right to determine useful life periods and prudent MRP in exceptional circumstances where the recommendations of the guidance would not be appropriate.

6 Non-operational assets

6.1 The Council will not charge MRP on its non-operational assets. MRP will only be charged in the financial year following the asset becoming operational. This policy will be reviewed annually.

7 Use of Capital Receipts

7.1 The Council may use capital receipts to reduce the CFR and, therein, to offset the MRP charge for that year. Any unapplied capital receipts will be available in future years and will be applied in a prudent manner.

8 Private Finance Initiatives (PFI)

8.1 Any PFI that comes onto the balance sheet under International Financial Report Standards will already have taken capital financing into account as part of their revenue charges. MRP charges for PFI will provide MRP on a contract life basis to match the life of the associated assets.

9 Third party loans

9.1 WNC will make prudent MRP payments in respect of loans to third parties.

9.2 When issuing a loan to a third party, the value of the loan will be classified as capital expenditure and will be financed from a permissible source of funding e.g. capital receipts, revenue financing, grant or borrowing. If the loan is financed by borrowing, WNC will make a Voluntary Revenue Provision (VRP) in year in respect of the loan.

9.3 VRP will be disclosed separately in the MRP Policy Statement (both in-year and cumulatively) to show the amount overpaid. This will be over the term of the loan.

9.3 At the point the third party loan is repaid, the principal repayments will be classed as capital receipts and the VRP will be reversed, offsetting the prudent MRP liability.

10 Revenue Expenditure Funded from Capital Under Statute (REFCUS)

10.1 Estimated life periods will be determined in line with accounting guidance and regulations. To the extent that expenditure is not on the creation of an asset and is of a type that is subject to estimated life periods that are referred to in the guidance, the Council will generally adopt these periods. However, the Council reserves the right to determine useful life periods and prudent MRP in exceptional circumstances where the recommendations of the guidance would not be appropriate.

11 Leases

11.1 IFRS16 on Lease accounting is due to come into effect from 1 April 2022, having been postponed from 1 April 2020 due to Covid-19. These new regulations will require the principal element of the majority of lease type arrangements to be treated as capital expenditure. Therefore, for MRP on lease liabilities the MRP will be equivalent to the principal element of the annual lease payment for each asset after adjusting for any sub-lease capital receipts.

Appendix F1 (b) – Capital Approvals Board Process

1.1 The overarching objective for the Board is to review and challenge capital schemes in order to be able to recommend to Cabinet that they move from the planning stage into delivery.

1.2 The Capital Approvals Board governance process aims to:

- Provide visible leadership in relation to the implementation of the Capital Strategy.
- Ensure funding is confirmed, secure and wherever possible received fully in advance of works commencing/being approved and that responsibility for this is taken by the project manager.
- Monitor performance against the Council's agreed capital discretionary funding levels.
- Escalate concerns and issues to Leadership Team.
- Optimise the funding for school's capital projects.
- Ensure other reporting and approval requirements have taken place, particularly in respect of new projects brought forward for consideration during the financial year.

For significant projects periodic updates should be taken through the capital projects board to ensure appropriate progress and budgetary controls are being adhered to. Following completion of these schemes, a post evaluation report should be brought back to the board to assess how well the scheme was delivered and what went well and not so well to ensure the learning from these schemes carries forward into future schemes and efficiencies are gained and risks and mitigations can be planned for at an earlier stage where relevant.

Appendix F1 (c) - Key Capital and Commercial Risks

1.1 The key risks inherent in the Council's commercial property investments include:

Category	Description of Risk	Potential Impact
Financial	Downturn in either specific areas of the property market or the wider commercial property market	May result in a decline in rents and/or an increase in vacant properties impacting adversely on the Council's income or inability to sell
Financial	Loss of one or more material tenants resulting in vacant properties and/or bad payers	May adversely impact on rental income
Financial	Over-reliance on commercial income streams to fund core services	May result in increased financial pressures should one of the income streams fail
Financial	Government changes regulations in respect of borrowing for commercial activity	May result on limits or prevention of borrowing for the commercial and other purposes.
Financial	Ability to fund costs associated with maintaining investment returns (i.e. income streams), for example ensuring that the investment stock suitably reflects market demands	May undermine investments resulting in increased financial pressures
Financial	If there are issues with income for an investment property that has been funded by borrowing there is a risk that the costs of borrowing will not be covered by the income from that property	May result in increased financial pressures.
Reputational/ Financial	Liquidity and Inflation risks – when the Council invests in commercial property the 'cash' it invests loses its liquidity. If the Council does decide to sell investment property, there is a risk that the market value of the property is lower in real terms than the amount invested	May result in reputational damage to the Council and increased financial pressures
Reputational	Unsuitable tenants, for example using premises let by the Council for illegal or undesirable purposes	May reflect badly on the Council's reputation
Strategic	Government intervention, e.g. setting limits on the commercialisation strategies or options available to local authorities	May limit resources through restricting potential funding streams

1.2 The key risks inherent in the Council's Capital Programme include:

Category	Description of Risk	Potential Impact
Financial	The longer a project takes to come to fruition, the greater the risk is that the financial cost of the project will have increased, both due to the additional staff time spent on the project and the inflationary impact on the costs involved in bringing the asset into operation	May result in financial pressures on other projects / programmes and service delivery
Financial	There is degree of correlation between the length of time a project spends in the feasibility and development stage and an increased risk of project failure or abandonment. Should a project fail for any reason, the regulations require all capital costs to be returned to revenue, which may create significant pressures, depending on the level of spend at that point	May result in additional revenue pressures on delivery / services
Financial	Project expenditure is higher than forecast estimates	May result in increased financial pressures or limitations on future investment options
Financial	Once a project has been delivered successfully the cash expended is then bound in the asset. In the case of assets that are for service delivery and do not generate a rental income stream, the money invested in the asset is only recovered if and when the asset is sold at a future date. This carries inherent financial risks in that the asset may have decreased in value, depending on market conditions, or may not have increased in value sufficiently to mitigate the effects of inflation	May result in increased financial pressures or limitations on future investment options
Financial	The capital programme is reliant on the availability of affordable borrowing and CIL income. Should there be any issues in securing these within the planned timescales, it may be necessary for the Council to review the expenditure in the capital programme.	May result in additional pressures on delivery/services

Appendix F1 (d) – Acronyms and Glossary

AMP	Asset Management Plan – The Council's policy document for managing its property asset portfolio
CaMKOx Arc	Cambridge-Milton Keynes-Oxford Arc
CFR	Capital Financing Requirement
CIL	Community Infrastructure Levy
CIPFA	Chartered Institute of Public Finance Accountants
CSN	CSN Resources = Cherwell and South Northamptonshire Resources – a Teckal company jointly owned with Cherwell DC.
DLUHC	Department for Levelling Up, Housing and Communities
DFC	Devolved Formula Capital – this is passported directly to schools to enable them to invest in their ICT, minor repairs, etc
DFE	Department for Education
DFG	Disabled Facilities Grant
DFT	Department for Transport
DRF	Direct Revenue Funding
HS2	High Speed 2
ICT	Information and Communication Technology
IFRS	International Financial Reporting Standard
IFRS16	New IFRS standard relating to accounting for leases due to start 1 April 2021
ITB	Integrated Transport Block
JCS	West Northamptonshire Joint Core Strategy
k	Thousand
LGF	Local Growth Fund
LGSS	Local Government Shared Service
LLP	Limited Liability Partnership
m	Million
MCR	Monthly Capital Report
MRP	Minimum Revenue Provision – minimum amount to be set aside annually in revenue for the repayment of debt principal.
MTCP	Medium Term Capital Programme
MTFP	Medium Term Financial Plan
NBC	Former Northampton Borough Council
NCC	Former Northamptonshire County Council
NSE	Net Service Expenditure – Defined by DLUHC as 'Gross service expenditure less fees and charges'
PWLB	Public Works Loans Board - A government agency that lends money to public bodies for capital purposes. Monies are drawn down from the national loans fund and HM Treasury determine the rates of interest are determined. As at

	October 2020 Councils are free to borrow as much as they like from the PWLB provided that it is prudent, affordable and sustainable and within the prudential and local indicators set by the Council.
REFCUS	Revenue Expenditure Funded from Capital Under Statute - Expenditure incurred during the year that may be capitalised under statutory provision but that does not result in the creation of a non-current asset that has been charged as expenditure to the CIES, but which may properly be financed over a period of years.
SCA	School Condition Allocation
SEMLEP	South East Midlands Local Enterprise Partnership
TDECL	The Daventry Estate Company Ltd – A wholly owned subsidiary for the provision of private rented housing.
WNC	West Northamptonshire Council