LONDON BOROUGH OF CAMDEN

WARDS: All

REPORT TITLE

Treasury Management Annual Report and Mid-Year Strategy (CS/2024/15)

REPORT OF

Cabinet Member for Finance and Cost of Living

FOR SUBMISSION TO

Resources and Corporate Performance Scrutiny Committee

Cabinet Council

DATE

8 October 2024 9 October 2024 14 October 2024

STRATEGIC CONTEXT

We Make Camden is our joint vision for the borough, developed in partnership with our community. The proposals ensure a strong treasury management strategy is in place to help achieve the ambitious vision of our communities. We Make Camden includes a commitment to "strong financial management". A robust and effective treasury management strategy is crucial to enabling this ambition.

SUMMARY OF REPORT

This report presents the treasury activity during 2023/24 and the first half of 2024/25, compliance with guidance and treasury indicators and an update on the economic background shaping the treasury strategy.

Local Government Act 1972 – Access to Information

There are no documents which are required to be listed.

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RECOMMENDATIONS

Resources and Corporate Performance Scrutiny Committee is asked to consider the report and make any recommendations to the Cabinet.

Cabinet is recommended to note the annual report (paragraphs 3.3-3.18) and Mid-year strategy (paragraphs 3.19-3.46) and recommend to Council for approval

Council is recommended to approve the Treasury Management Annual Report (paragraphs 3.3-3.18) and the Mid-year Strategy (paragraphs 3.19-3.46) outlined in this report;

Signed: Signed by the Director of Finance

Date: 26 September 2024

1. CONTEXT AND BACKGROUND

- 1.1. This report presents an update on the previous year's treasury management activities together with a mid-year update on progress against the current year's strategy. The annual report demonstrates the effect of the decisions taken in accordance with the 2023/24 Treasury Management Strategy as well as how treasury activity has complied with that policy. The mid-year report considers the continuing suitability of this year's strategy at the mid-year stage.
- 1.2. The report provides detailed assessment of our treasury management activity, but in summary, it is worth noting that:
 - There is no increase in the risk profile and appetite and the Council continues to operate prudent debt and investment strategies.
 - All Councils are operating in challenging and volatile economic circumstances with Central banks globally struggling to control inflation and financial markets expecting economies to enter recessionary periods. This is a very different scenario compared to past years and requires a prudent approach.
 - The Council has not engaged in the arguably riskier commercial activities
 that have led to a tightening of the treasury framework for all Councils. While
 we continue to look at ways in which to maximise our investment returns, this
 has not been at the expense of the security of our investments.
 - Treasury Management issues have compromised the financial stability of some councils, particularly where lending practices have led to defaults or where commercial ventures have underperformed. However, Camden has maintained a prudent approach, avoiding such high-risk activities. Our strategy focuses on ensuring that our capital programme remains affordable and sustainable, while treasury management continues to support the Council's financial stability by managing revenue pressures effectively within the agreed budgets.
 - There are no immediate plans for new borrowing at this time. The internal borrowing policy continues to be sensible (saving £533k per annum) and appropriate given the outlook for interest rates on debt and investment. The policy ensures the Council minimises interest paid on debt and uses investment resources efficiently.
 - During 2023/24 and the first half of 2024/25, the Council has operated within its treasury and prudential indicators set which demonstrates good governance and control.
 - On 24 February 2022 the North London Waste Authority (NLWA) borrowed £250m and this cash is co-invested alongside Council investment balances and has therefore increased investments under management. On 19 January 2023 the NLWA borrowed £200m and a further £140m on 11 July 2024. The Executive Director Corporate Services is NLWA's Financial Adviser and has delegated authority to increase limits as and when future NLWA borrowing occurs in order to manage higher investment balances. While this may affect the scale of those investments, the underlying strategy remains unaffected. Any decisions made are within NLWA governance. Note this report only reports on NLWA investments as invested alongside Council investments. All NLWA borrowing is not reported here but will be reported to the NLWA as part of their governance.

2. PROPOSAL AND REASONS

2.1. The Council is required by regulations issued under the Local Government Act 2003 to produce an annual treasury management review of activities and the actual prudential and treasury indicators for 2023/24. It is also required to

review the 2024/25 annual strategy mid-year. This report meets the requirements of both the Chartered Institute of Public Finance and Accountancy (CIPFA) Code of Practice on Treasury Management (the Code) and the CIPFA Prudential Code for Capital Finance in Local Authorities (the Prudential Code).

3. OPTIONS APPRAISAL

- 3.1. The effective management and control of risk are prime objectives of treasury management. Risks can include, amongst others, the failure of a bank to repay a loan. The Council needs to determine for itself how it pursues value for money whilst simultaneously striving to effectively manage and control such risks.
- 3.2. The Council has strategic options available in the management of its debt and investment portfolios:
 - The Council must decide when it is appropriate to take on new **debt** and at
 what rates in order to fund its existing and planned capital expenditure. The
 Council can also choose to 'internally borrow' by avoiding new debt and
 instead using reserves and working balances to fund borrowing.
 - The Council sets an **investment** strategy that prioritises security and its cash flow needs whilst maximising investment income.

ANNUAL REPORT

Borrowing

- 3.3. The borrowing strategy agreed for last year was premised on three factors:
 - the Council's continuing underlying need to borrow
 - the availability of reserves and working capital to cover under-borrowing (the capital financing requirement less existing borrowing), and
 - the difference in rates available for investments versus those charged for new debt (the 'cost of carry'). Borrowing rates were expected to fall gradually during the year.
- 3.4. The Council is internally borrowing which means it is temporarily using its own resources (reserves and working capital) to fund past and planned capital expenditure rather than entering into new borrowing. Although external debt stood at £314m at the end of 2023/24, the overall need to borrow (the Capital Financing Requirement or CFR) was £636m and therefore the Council was under-borrowed by £322m. Note NLWA debt is not included in these figures and reported separately to their Authority.

TABLE 1: YEAR END DEBT POSITION

	Value	31-Mar-23 Average interest rate (%)	Avg life (yrs)	Value	31-Mar-24 Average interest rate (%)	Avg life (yrs)
Fixed rate (PWLB) borrowing	£198m	5.54	19.55	£190m	5.31	19.56
Variable rate (market) borrowing	£124m	4.63	28.96	£124m	4.63	27.95
Total debt	£322m	5.08	24.25	£314m	4.97	23.76
Capital Financing Requirement (CFR)	£662m			£636m		
Under-borrowing	-£340m			-£322m		

- 3.5. Table 1 shows that overall debt has decreased to £314m with loans maturing with a value of £8m in 2023/24. The overall average interest rate payable on the borrowing portfolio has decreased to 4.97% at the end of March 2024 and the average life of the portfolio was 24 years at that date.
- 3.6. Market debt remains unchanged at £124m during the year. The market debt comprises 6 LOBO (lender's option borrower's option) loans. LOBOs remain part of a valid, diversified borrowing strategy. Camden's market loans were acquired at lower interest rates than available from the Public Works Loan Board (PWLB) and, as per Table 1, the average rate for LOBO loans is currently lower than the average rate for the Council's PWLB borrowing. It is important to note that our LOBO loans are straight forward rather than the more complex loans ('inverse linkers') that other Councils have been involved with which have been investigated by the Communities Select Committee and have been prominent in the press.
- 3.7. LOBO loans can be 'called' by the lending banks on a half yearly basis which means the lender can change (increase) the rates applied and the borrower (the Council) has the 'option' to accept the new rate or repay the loan.
- 3.8. Although it is not estimated that these loans will be called over their lifetime, the Council keeps the loans under review and will negotiate a rescheduling when and if market conditions allow. Scenario testing carried out by the Council's treasury consultants, Link Asset Services, indicates that the cumulative call probability of a call by LOBO lenders will increase from circa 35-45% using current market expectations of interest rates to 40-55% when an additional 0.5% was added to future interest rate expectations over the life of the loans.
- 3.9. In accordance with the internal borrowing approach adopted, the Council did not take on any new debt during the year. The Council could have decided to borrow at rates (currently offered at 5.29% for 50-year loans) to meet some of its outstanding borrowing requirement. However, as the Council has no immediate need for external borrowing, this would have resulted in a 'cost of carry' of £533k (i.e. the difference between new borrowing rates and investment rates on re-invested cash not immediately required) which would be a real revenue cost to the Council.
- 3.10. The Council is required to work within a prudential framework which sets indicators for deciding the level of affordable borrowing and managing debt. The Council has complied with the requirements of the Prudential Code and Treasury Management Code of Practice throughout the year and remained within borrowing limits set (see indicators set out in Appendix 1). The debt portfolio remains affordable and appropriately structured with no immediate requirement to restructure the portfolio. Officers monitor the under-borrowing position with our treasury consultants regularly to ensure that the internal borrowing strategy remains appropriate.

Investments

3.11. The Council's investment strategy is governed by the Ministry of Housing, Communities and Local Government (MHCLG) guidance, and is approved annually by Council in March of each year. Using credit ratings provided by the three main rating agencies together with additional market information, this strategy sets out which counterparties (mainly banks but also other local authorities) the Council can invest with, cash limits for each counterparty, and the maximum investment term for each counterparty. Given the scale of investments under management the Council is more risk aware in setting its criteria for investment than other boroughs. The investment activity during the year conformed to the approved strategy.

- 3.12. Bank of England base rates were 0.75% on 1 April 2022 and during 2022/23 there were 8 increases with rates finishing the year at 4.25%. Since then, the Bank has raised rates at each successive meeting ending up at 5.25% in August and leaving them on hold. Rates dropped to 5% in August 2024. The Council continued to adopt a prudent approach to investment with security as the prime consideration. Whilst the Treasury function aims to optimise investment opportunities, it is primarily concerned with stewardship of public money.
- 3.13. Throughout the 2023/24 year the Council maintained average investment balances of £671m and the average rate of interest earned was 4.95%. This compared to average Sterling Overnight Index Average (known as SONIA) for 3 months of 5.12%, average 6-month SONIA of 5.23% and average 12-month SONIA of 5.24%.
- 3.14. The investment strategy limited investments with suitable counterparties to two years including NatWest due to it being part-nationalised with Government support. The investment strategy also allows investment with local authorities up to two years.

Regulatory guidance

- 3.15. On 20 December 2021 CIPFA published revised codes which build on previous editions (these include changes in capital strategy, prudential indicators and investment reporting). The Council continues to follow the principles within these codes that the Authority will not borrow to invest primarily for financial return. This Council is very supportive of the financial freedoms in the Prudential Code which the current framework allows and would want to protect our right to determine affordable capital schemes rather than a return to centrally set borrowing approvals.
- 3.16. The Prudential Code maintains the principle-based approach to decision-making (ensuring capital financing decisions are prudent, affordable and sustainable). The 2023/24 Treasury Management Strategy reported in March 2024 included a summary of the capital expenditure plans and forecast capital financing requirements and considers long-term borrowing needs.
- 3.17. The Treasury Management Code includes non-treasury investment activities, which reflects the increasingly prominent commercialisation agenda in public sector organisations.
- 3.18. MHCLG investment guidance for local authorities (2018) made a number of changes primarily to address the non-treasury investments used by some Councils. Local authorities are required to follow the guidance and the Council incorporated these changes into the Treasury Management Strategy.

MID-YEAR STRATEGY UPDATE

3.19. During the first half of 2024/25 the Council has continued with the Treasury policies pursued recently. It continues to avoid expensive borrowing by internally borrowing and has a prudent investment policy. The Council has

- complied with the CIPFA codes and its prudential and treasury indicators during the first half of 2024/25.
- 3.20. The 2024/25 Treasury Management Strategy noted that long-term borrowing rates were likely to fall. Following the Bank of England's decision to decrease interest rates to 5% on 1 August 2024, the Council's treasury advisors Link had forecast base rate would remain at 5% in September 2024 but may fall again later in the year. Changes to base rates have a strong influence on the returns available to the Council on its short-term investments in the UK money markets. Link expect gilt yields and PWLB rates to reduce accordingly.
- 3.21. The UK's quarterly economic growth was increased by 0.6% in the second quarter of 2024, following an increase of 0.7% in the first quarter. The Consumer Price Index rose by 2.2% in the 12 months to July 2024, up from 2% in June 2024. The largest upward contribution to the monthly change came from housing and household services where prices of gas and electricity fell by less than they did last year.
- 3.22. A loan of £6.4m will be made to Camden Living Social Offer Ltd ("CLR"), a Council subsidiary company which is in the advanced stages of applying to become a Registered Provider. The loan's purpose will be to enable CLR to purchase 34 newly constructed CIP housing units from the Council at Central Somers Town to let at Social Rent . The loan forms part of the Camden Living Implementation Strategy agreed by Cabinet in September 2022 and is subject to CLR completing its RP registration. It will be at a submarket rate of 3% and is anticipated to be completed in late 2024/ early 2025. Detailed terms of the loan are currently being approved through a Non Key Executive Decision being taken by the Executive Director Corporate Services as one of the actions to activate the Camden Living Implementation Strategy. The final provisions of the Council's loan agreement with CLR will be approved by the Director of Finance in a further Non Key Executive Decision.

Borrowing

3.23. Borrowing is based on past and planned capital expenditure and must remain affordable within revenue budgets to ensure services continue without disruption. Although additional capital schemes were added to the programme in July 2024, including £22m for 2023/24, none were funded through borrowing. As a result, the impact on the borrowing requirement for 2024/25 remains unchanged, with planned capital expenditure at £223m and financing at £203m

TABLE 2: ESTIMATED CAPITAL EXPENDITURE AND FINANCING FOR 2024/25

	2024/25 Original Estimate	2024/25 Revised Estimate	Variance
Capital expenditure	223	223	0
Less: financing	203	203	0
Impact on borrowing requirement	20	20	0

3.24. The annual change to the borrowing requirement remains unchanged for 2024/25. Although future capital expenditure includes projects such as the Veolia waste trucks, these will impact borrowing in later years, not in 2024/25.

The Capital Financing Requirement (CFR) for 2024/25 has increased to £734m from £646m in March 2024, as initially estimated (Table 3). The annual change to the borrowing requirement has stayed the same for 2024/25, and so is the same at year-end compared to the March estimate. Overall, the estimated Capital Financing Requirement (CFR) for 2024/25 has increased to £734m from £646m in March 2024 when the Treasury Management Strategy was agreed (Table 3).

TABLE 3: MEDIUM TERM BORROWING REQUIREMENT*

	2024/25	2025/26	2026/27	2027/28	2028/29
	£m	£m	£m	£m	£m
CFR (excl PFI)*	734	743	726	731	667
GF CFR	126	122	116	111	105
HRA CFR	607	622	609	620	562
Gross borrowing	293	293	281	281	281
GF	38	38	36	36	36
HRA	255	255	245	245	245
Under-borrowing	441	450	445	450	386
GF	89	84	80	75	69
HRA	352	366	365	376	317

^{*}N.B. All figures as at 31 March and exclude PFI and finance leases

- 3.25. Table 3 shows that the amount of capital expenditure (both past and current) that requires financing (the CFR). The CFR peaks in 25/26 at £743m. The Council currently has existing borrowing of £293m (with £20.7m maturing in 24/25) and this reduces as debt matures over the five-year period to £281m. In 2024/25 the Council will be under-borrowed by £441m and this under-borrowing will increase to a peak of £450m in 2025/26 and 2027/28 (if no new borrowing is entered into).
- 3.26. The Council operates two distinct debt pools. This helps focus attention on the individual and differing needs of the Housing Revenue Account (HRA) and General Fund (GF). Decisions to borrow are considered with regard to these two pools' requirements.
- 3.27. While current borrowing rates have decreased, locking in fixed interest rates now may not be beneficial in a falling interest rate environment, as further reductions could present more favourable borrowing opportunities in the future. Additionally, taking on new debt at this point would result in an immediate cost of carry of £533k, which would be a direct expense to the Council without an immediate need for borrowing. The HRA faces significant interest cost pressures due to its larger borrowing needs for housing projects, making cost management crucial. In contrast, GF debt remains more manageable. Given these factors and the significant pressure from HRA interest costs, internal borrowing remains the most prudent and cost-effective strategy for both the GF and HRA.
- 3.28. It is far from certain in the current financial and political environment what the trajectory for inflation and interest rates will be and so the policy on internal borrowing may need to change. However, Camden's forecast cash balance remains positive despite the capital expenditure planned and the movement on reserves and balances. Therefore, to incur the cost of carry estimated at £533k cannot be justified whilst positive cash balances continue (up to 2028/29) and internal borrowing is the best course of action. Officers monitor the under-

borrowing position with our treasury consultants regularly to ensure that the internal borrowing strategy remains appropriate. This includes monitoring forecast rates and any changes in future plans to ensure the most suitable policy is used to fund our existing debt liabilities, planned prudential borrowing and other cash flows.

- 3.29. The Government has consulted on future PWLB lending terms after it raised rates by a further 1% on loans citing increased use of PWLB borrowing to support commercial projects in the public sector. Whilst there are exemptions for housing and regeneration this Council has argued against further controls outlined in the consultation. The Treasury updated the terms and conditions applied to PWLB lending, including more details on PWLB loans permitted and prohibited.
- 3.30. Debt rescheduling opportunities have been limited in the current economic climate and consequent structure of interest rates and following the increase in the margin added to gilts yields, which has impacted PWLB new borrowing rates since October 2010 and more recently in 2020. No debt rescheduling was undertaken during the first part of the year. Currently it would cost £4.3m to reschedule the £198m PWLB debt (in addition to repaying the principal debt amount) and so this is not economically advantageous.
- 3.31. The Council monitors its market loans which have semi-annual options for lenders to reset interest rates and the option to either accept or repay these loans. Many Councils have found it difficult to refinance these loans when this happens. This Council regularly reviews both the likelihood, market practice and options for refinancing. It is not expected that our loans will be called and we keep this under review.
- 3.32. The Council is required to set both an operational boundary and an authorised limit for external debt (Appendix 1). No difficulties are envisaged for the current or future years in complying with these prudential indicators.

Investment Strategy

- 3.33. The Council's investment priorities are:
 - (a) security of capital (primarily) and
 - (b) liquidity of its investments (secondly).
- 3.34. After these overriding priorities, the Council will aim to optimise return on its investments (thirdly) commensurate with high levels of security and good liquidity. The risk appetite of this Council is low in order to give priority to security of its investments which is paramount.
- 3.35. The UK money market investment environment has changed with a downward trajectory for investment rates. The pace of changes to Bank Rate remains a key determinant of investment returns. Following the Bank of England's decision at its meeting on 1 August 2024, the Monetary Policy Committee (MPC) voted to decrease the base rate to 5%. The Council aims to achieve the optimum return (yield) on investments commensurate with high levels of security and liquidity. In the current economic climate and the heightened credit concerns, it is considered appropriate to keep investments short term, and only invest with highly rated financial institutions, but also to seek out value available in periods up to 12 months with highly credit rated financial institutions.

- 3.36. The Council invests in three **Money Market Funds** (MMFs) (Aberdeen, JP Morgan and Goldman Sachs) which are all in the Low Volatility Net Asset Value (LVNAV) class. Money Market Fund Regulations restrict LVNAV funds from returning negative rates. If negative rates are a possibility, fund managers will either need to convert to accumulating share classes (ultimately 'decumulating' in value) and/or adjust their fees to avoid the need to change to this type of fund. An accumulating share class vehicle reinvests the income received back into the fund, as opposed to distributing the returns back to the investor.
- 3.37. In terms of security, the price of Credit Default Swaps (CDS essentially a means of insuring against a borrower's failure to repay debt) has decreased during the first half of the year indicating reduced concern about banks' security. Link provide information on banks' CDS pricing and all banks on our list remain within tolerance.
- 3.38. The Council held £684m of investments as at 19 August 2024 (£413m at 31 March 2024) and the average rate of return on this date was 5.09% (5.48% at 31 March 2024). £238m of this investment balance was invested on behalf of the NLWA. The rate of return has decreased (along with investment returns generally) as the Base rate has decreased to 5%. The Council's treasury consultants forecast the base rate will remain at 5% in Autumn and decrease to 4.50% in December 2024 and 4% in March 2025.
- 3.39. **NatWest bank** is eligible for inclusion on the Council's counterparty list. Given the Government's significant holding in the part-nationalised bank it is still not considered to be pure banking risk and is eligible for investments of up to two years on the Council's counterparty list. Due to significant, but not controlling, Government ownership, NatWest is considered to have quasi-sovereign risk, not pure banking risk, and has a limit of £135m.
- 3.40. The above position is being kept under review as the UK government has taken the decision to gradually reduce its holding (now at 18.99%), and has the longer-term intention to fully divest itself of the bank by 2025-26.
- 3.41. The approved counterparty limits and prudential and treasury indicators were not breached in the year to 19 August 2024 and there were no liquidity concerns.
- 3.42. The **NLWA** is constructing an Energy Recovery Facility (ERF) as part of the North London Heat and Power Project (NLHPP). An estimated cost of £800m–£850m was initially discussed in November 2021 based on early project estimates. While the final cost may vary, this figure was used to reflect the expected range at that time. On 16 December 2021, the NLWA borrowed £280m from the PWLB to support the project. This amount was invested in Euro MMFs to hedge against currency fluctuations, as the contractual commitments for the plant are in Euros. Of the initial €330m (£280m in sterling) invested, approximately €71m remains following euro-denominated payments.
- 3.43. The NLWA borrowed an additional £250m in February 2022, £200m in January 2023 and a further £140m in July 2024 to cover their procurement for the new ERF. This was to cover sterling capital expenditure. This cash has been invested alongside the council's investment balances, £238m invested on behalf of the NLWA included within the investment portfolio reported here. Subsequently, investment limits were increased in a report to the Executive

Director Corporate Services on 11 May 2022 (these increased limits are shown in brackets within Table 4). This was within delegated responsibility agreed by Council in the <u>Treasury Management Annual Report and midyear strategy report</u>¹ (November 2021). The approved Treasury Management Strategy includes the maximum investment period of 2 years for banks and local authorities.

TABLE 4	CDEDIT DATING CDITEDIA
TARIF 4	CREDIT RATING CRITERIA

Fitch		Моо	oody's S&P		§Р	Cash limit	Maximum Duration
Long Term	Short Term	Long Term	Short Term	Long Term	Short Term		
AA-	F1+	Aa3	P-1	AA-	A-1+	£45m (£80m)	2 years
AA	F1+	Aa2	P-1	AA	A-1+	£60m (£100m)	2 years
AA+	F1+	Aa1	P-1	AA+	A-1+	£80m (£140m)	2 years
AAA	F1+	Aaa	P-1	AAA	A-1+	£95m (£160m)	2 years

- 3.44. Officers will consider widening the number of MMFs used and consider adding additional funds to diversify risk should it be deemed necessary.
- 3.45. The Treasury Management Strategy permits the use of **Multilateral development bank** bonds with a limit of £40m per counterparty. In order to manage the potential euro NLWA commitment some of the money required in year two and later could be invested in bonds and commercial paper issued by the European Investment Bank which is a Supranational Bank owned and supported by European Union nations. The European Investment Bank (EIB) are the biggest multilateral financial institution in the world with a AAA credit rating. The use of these EIB bonds and commercial paper would help diversify risk away from the Euro MMFs and provide a safe and stable investment option for medium term euro balances.
- 3.46. The Council is using a local climate bond in the form of a Community Municipal Investment (CMI). Launched on 29 June 2022 at a value of £1m and a rate of 1.75%. This is an innovative financing route which gives the Council another way to realise its ambitious 2030 zero carbon target and is a first step towards introducing new financing measures towards reducing carbon emissions.

4. WHAT ARE THE KEY IMPACTS / RISKS? HOW WILL THEY BE ADDRESSED?

- 4.1. The key risk connected to the investment strategy is that the Council suffers financial loss due to a borrower failing to make a repayment. The approved lending list ensures that funds are only placed with creditworthy banks.
- 4.2. Liquidity risk (the risk that the Council does not have funds available to make day-to-day payments) is another important concern. This risk is managed by the treasury team by ensuring investments mature at the right time to enable the Council to finance its day-to-day activities.

5. CONSULTATION/ENGAGEMENT

5.1. There is no consultation required.

 $[\]frac{^{1}\text{https://democracy.camden.gov.uk/documents/s}99776/Treasury\%20Management\%20Annual\%20Report\%202020}{-21\%20and\%20Mid-Year\%20Strategy\%202021-22\%2010112021\%20Cabinet.pdf}$

6. LEGAL IMPLICATIONS

6.1. The Borough Solicitor has been consulted and has incorporated comments into this report.

7. RESOURCE IMPLICATIONS

7.1. The comments of the Executive Director Corporate Services have been incorporated into this report.

8. ENVIRONMENTAL IMPLICATIONS

8.1. The Community Municipal Investment is a means of funding ongoing local net zero projects via green finance. These projects include electrical vehicle charging points, healthy school streets, solar on council estate roofs and greening of Camden's transport fleet.

9. TIMETABLE FOR IMPLEMENTATION

9.1. Changes set out in this report and approved by full Council will be adopted immediately.

10. APPENDICES

Appendix 1 Prudential and Treasury Indicators

REPORT ENDS