

## LONDON BOROUGH OF WALTHAM FOREST

Meeting / Date	<b>Cabinet</b> <b>7<sup>th</sup> December 2023</b>	
Report Title	<b>MEDIUM TERM FINANCIAL STRATEGY</b> <b>2023/24 – 2026/27</b>	
Cabinet Portfolio	Councillor Paul Douglas, Portfolio Lead Member for Finance and Resources	
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Wards affected	None specifically	
Public Access	OPEN	
Appendices	Appendix 1 – Equalities Screener	

### 1. SUMMARY

- 1.1 This report provides an update on the Council's Medium-Term Financial Strategy (MTFS) for the period 2024/25 to 2026/27.
- 1.2 In March 2023, Council approved the 2023/24 budget alongside the future years MTFS. At that stage, there was a total budget gap of £13.086 million over a 2-year period from 2024/25 and 2025/26.
- 1.3 In November 2023, a report was presented to Cabinet setting out the financial challenges that are currently being considered by the Council. The report also described the initial budget management activities and longer-term transformation agenda that will enable us to meet these challenges.
- 1.4 This report updates the MTFS position for the next three years to 2026/27. The provisional settlement, which is anticipated by 19<sup>th</sup> December and the final settlement in late January 2024, will confirm the final funding position for 2024/25 as it is likely to be another one-year settlement. Therefore, this report provides an update on the financial position based on the information available at this time. The final budget report for 2024/25 and MTFS will be presented to Cabinet in February 2024 before going to Council for approval.
- 1.5 For 2024/25, the Council's budget is facing several challenges including an ever-increasing level of demand for essential services, compounded by cost-of-living pressures, including inflation, interest rates and increases in energy costs. Within Adult Social Care alone, the council is now caring for 1,000 people more than it was before the pandemic. The government allows councils

to put 2 per cent on Council Tax to support this work, but even during the past year alone the demand in Waltham Forest services have risen by 13 per cent.

- 1.6 The current in year position reported in the month 7 monitor, is a forecast overspend of £15.882 million, due to a combination of demand and inflationary increases plus the £3.065m staff pay deal which was always planned to be funded from contingency.
- 1.7 Waltham Forest is a well-run council that prides itself on sound financial management. However, it is not immune from the crisis in local government finances. The council have taken difficult decisions that have been needed to manage the budget and balance the increasing demand on services against what can be afforded. Since 2010, the council have had to find £120m in savings after a huge reduction in funding.

## 2. RECOMMENDATIONS

2.1 Cabinet is recommended to:

- 2.1.1 **Note** the potential funding gap of £27.912 million for the 3-year period 2024/25 to 2026/27 with £12.242 million in 2024/25, assuming all service-related pressures are resolved. The final position will not be known until the provisional local government finance settlement and final settlement are released. The provision settlement is expected in late December.
- 2.1.2 **Note** the requirement to achieve savings from management actions, efficiencies and a transformation programme, to mitigate the in-year baseline pressure reported in the month 7 monitor of £15.882 million, the £3.065m staff pay deal (funded from contingency), the potential funding gap for 2024/25 million of £12.242 million and £15.670 million for 2025/26 and 2026/27.
- 2.1.3 **Note** the MTFs refresh assumes a council tax increase of 4.99% in 2024/25 which is subject to Council approval.
- 2.1.4 **Note** the continuing uncertainty resulting from likely delays to the spending review, Fair Funding Review and proposed changes to the Business Rates Retention scheme;
- 2.1.5 **Note** the outline timetable for the budget process as set out in paragraph 3.29 of this report.
- 2.1.6 **Delegate** to the Strategic Director of Resources the authority to distribute any contingency budgets and/or reserves as per the Council's financial ground rules which were reaffirmed within the Month 2 Finance Monitor.

## 3. PROPOSALS

- 3.1 Setting the Council's annual revenue budget has been a challenging process for a number of years. The Council has in every year delivered a balanced Budget, against the backdrop of a growing population and an increase in the demand for services. Efficiency savings have continued to remain a priority in order to minimise the effect on front-line services.

- 3.2 As outlined in the November cabinet paper, the Council has developed an immediate response to close the funding gap for the MTF period, including a range of budget management activities focusing on managing down current expenditure. A transformation programme is being developed to ensure the on-going financial sustainability of the Council.

### **ECONOMIC CONTEXT**

- 3.3 The slow reduction in inflation rates coupled with an increase in interest rates has resulted in a very difficult economic picture for 2023, not just for residents but also for the Council. The Consumer Price Index (CPI) has not fallen in line with earlier predictions and stood at 6.7% in September 2023. The Bank of England Base rate currently stands at 5.25% and has been held at this level in recent months, indications are that the rate is unlikely to decrease until 2025 as the Bank of England moves to suppress demand and reduce the risk of sustained higher inflation. The impact of these high levels of inflation are increasing costs for the Council through higher utility costs, pay and provider costs as well as higher borrowing costs.

### **NATIONAL CONTEXT**

- 3.4 Local government finances are in crisis. Up and down the country councils of every size, shape and political party are having to respond to record demands with dwindling resources. These pressures include supporting an ever-more elderly population in their homes, helping young people badly impacted by the Covid-19 pandemic, and dealing with the cost-of-living crisis affecting families struggling to cope. 13 years of austerity, coupled with the effects of inflation and the dramatic rise in demand for social care, means councils have been forced to use reserves to pay for essential services. This is not sustainable - councils up and down the country are having to make further savings to services already diminished by years of austerity.

### **FINANCIAL CONTEXT**

#### **Central Government Funding**

- 3.4 There have been no specific announcements on local government funding since the 2023/24 Local Government Finance Settlement. However, it is generally assumed that the 2024/25 funding will be in line with the Policy statement issued in December 2022 by the Department for Levelling Up, Housing and Communities (DLUHC).
- 3.5 The long-term funding position for local government including 2025/26 and 2026/27, is currently unknown. A Policy Statement is anticipated in mid-December following the Autumn Statement on the 22<sup>nd</sup> of November which might give indications of funding for future years. However, future local government funding will be impacted by several policy decisions over the next few years, including a spending review, Fair Funding Review and baseline reset.
- 3.6 Future funding, for 2025/26 is also likely to be impacted by the timing of the General Elections which must be by January 2025.

### Council Tax

- 3.7 Council Tax forms an important part of the Council’s funding for services, therefore, if it is not increased in line with that permitted as part of the settlement, it will potentially increase the budget gap. It should also be recognised that any future reforms to local government funding are likely to assume that the Council is increasing the tax in line with referendum limits.
- 3.8 For the purposes of planning, the MTFS assumes a 4.99% referendum limit for 2024/25 as indicated previously by DLUHC and dropping back to the referendum limit of 1.99% for 2025/26 and 2026/27. However, these increases are subject to Council approval. The 4.99% increase includes 2% for Adult Social Care precept and the remaining 2.99% for core services. The MTFS estimates annual Council Tax receipts as:

Council Tax Income	2024/25	2025/26	2026/27
Estimated Receipts £’000	£138,431	£142,610	£146,525
% Increase	4.99%	1.99%	1.99%

- 3.9 The impact of a 1% increase or decrease in Council Tax would be £1.256m. However, any decrease in Council Tax in any year could not be recouped in subsequent years.

### Business Rates

- 3.10 Business Rates baselines were set in 2013/14 following the change to a business rates retention model. The Government created a baseline for each authority which was their expectation of what each authority would collect. Councils could then retain an element of growth generated above that baseline.
- 3.11 This scheme was implemented with periodic resets which would redistribute that growth across all authorities. A reset was due to take place in 2018/19, whereby Waltham Forest estimated a gain of c£5 million on its base funding position. Due to the continuing delays to the reset, uncertainty around the Business rates retention scheme and lack of growth in the economy, this gain was removed from the MTFS projections for 2024/25 onwards.
- 3.12 The Government has recently consulted on some technical changes to the Business Rates Retention scheme, namely around changes to the business rates multipliers which could amend how Councils are compensated for inflationary increases in reliefs given. The impact of this is continuing uncertainty around business rates income for 2024/25 and will not be confirmed until the settlement in December.
- 3.13 The Council is currently part of an 8-borough pool for Business Rates Retention and intends to continue for 2024/25.

### MEDIUM-TERM FINANCIAL STRATEGY 2024/25 to 2026/27

- 3.14 In March 2023, as part of its annual budget setting process, the Council

approved its MTFs which had a balanced position for 2023/24 and estimated a funding gap of £13.086 million across the 2-year period, 2024/25 and 2025/26. This revised MTFs position is now indicating a total funding gap of £27.912 million over a 3-year period, with £12.242 million forecast for 2024/25, £8.195 million forecast for 2025/26 and £7.475 million for 2026/27 but this assumes that all service pressures are resolved. However, this revised MTFs position is subject to confirmation of the funding position, initially for 2024/25 as part of the provisional settlement.

- 3.15 Given the unknowns around the future of government funding and the true impact of inflation on the Council's finances, the MTFs position outlined in the table below includes a number of assumptions. Any final funding gap included within budget report and current service pressures will be mitigated by management actions and savings proposals currently being prepared by services. A transformation programme is currently being designed which will ensure the long-term financial sustainability for the Council. If there are any residual funding gaps for 2024/25, potentially due to the time it might take to deliver savings proposals, reserves might be utilised.
- 3.16 Due to the scale of the financial pressures and the requirement to protect essential services, it is evident that difficult decisions will be required. However, where applicable, there will be full consultation prior to the implementation of specific savings proposals.
- 3.17 The table illustrates the movement from the funding gap of £13.086 million included within the 2023/24 budget report to the revised MTFs gap of £27.912 million, assuming all service pressures are resolved:

Summary of Changes since Budget Report	2024/25	2025/26	2026/27	Total
	£'000	£'000	£'000	£'000
<b>Funding Gap 2023/24 Budget Report</b>	<b>11,580</b>	<b>1,506</b>	<b>0</b>	<b>13,086</b>
<b>Known Commitments</b>				
Additional Inflation pressures	8,068	788	6,347	15,203
Concessionary Fares scheme	(600)	1,820	1,495	2,715
Impact from Crematorium		(250)	(250)	(500)
Passport additional Social Care grants to People Directorate *	3,167	0	0	3,167
Passport changes to ASC precept to Adult Social Care	28	(52)	149	125
Known Service Pressures	271	1,035	1,550	2,857
<b>TOTAL KNOWN GAP (A)</b>	<b>22,514</b>	<b>4,848</b>	<b>9,291</b>	<b>36,653</b>
<b>Changes to funding Sources</b>				
Reduction to Government Grants (not social care) *	1,531	1,662	709	3,902
Additional Grant funding for social care *	(3,167)			(3,167)
Increase in settlement funding agreement *	(5,487)	460	1	(5,026)
Increase in fees and charges	(232)	(236)	(242)	(710)
Increase in Council tax income			(2,846)	(2,846)
Collection fund surplus	(1,093)	1,093		0
Changes to council tax base	(192)	369	(1,070)	(893)
Drawdown from reserves to support enhanced council tax support scheme	(1,632)		1,632	0
<b>POTENTIAL TOTAL FUNDING GAP (B)</b>	<b>12,242</b>	<b>8,195</b>	<b>7,475</b>	<b>27,912</b>

\* Subject to Provisional Settlement

- 3.18 The key assumptions in the current MTFs refresh for the period 2024/25 to 2026/27 are.

- The final 2023/24 pay award, which averages at 6.4%, with additional cost of £3.1 million compared to the assumption of 4% in the 2023/24 Budget.
- Contract and pay inflation at 4% for 2024/25 and then reducing to 2% for subsequent years.
- Fees and charges increase totalling £0.177m in 2024/25.
- Savings targets will be achieved by services to close the funding gap over the MTFS period. Any residual gap will be funded from reserves.
- The additional Adult Social Precept, social care grant, market sustainability grant and discharge grant are all passported to the service.

3.19 The following funding assumptions modelled in the MTFS refresh are all dependent upon confirmation in the provisional settlement:

- Council Tax rise 4.99% in 2024/25 reducing to 1.99% in subsequent years and also subject to agreement of Council.
- Business rates related income increasing by 6.7% for 2024/25 after adjusting for the revaluation changes.
- Revenue Support Grant increase by 6.7%.
- Social Care grants increase for 2024/25 are based on Policy statement issued in 2022 and allocations consistent with prior years.
- The business rates related income, revenue support grant and social grants are all assumed to be cash flat for 2025/26 and beyond.
- New Homes Bonus scheme continues for one further year in 2024/25.
- The Service Grant is assumed to reduce by 50% in 2024/25, from £2.837 million to £1.419 million, then to £0.709 million in 2025/26 and nil in 2026/27.
- Any surplus on the collection fund will be used to reduce the budget gap.
- The impact of the current consultation on changes to the Business rates Retention scheme have not been reflected in the refresh due to lack of detail but will be confirmed as part of the provisional settlement.
- The impact of the fair funding review has not been reflected in this MTFS refresh.

3.20 The following table illustrates the forecast movement in the base budget which is an increase of £24.06 million or 8.6% from 2023/24 to 2026/27 (i.e., from £278.635 million to £302.695 million). However, this is offset by a forecast increase in pressures of £49.37 million, for the same period, with the largest element being inflation for both pay and contracts totalling £26.77 million.

<b>MTFS Summary</b>	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>
<b><i>Known Commitments</i></b>			
Inflation	14,154	20,669	26,774
Concessionary Fares scheme	2,300	4,120	5,615
Known Service Pressures	1,990	3,426	4,976
BR Reset (not anticipated in MTFS period)	5,000	5,000	5,000
Passport additional grant income to People	5,339	5,339	5,339
Passport increases in ASC Precept to ASC	2,893	3,095	3,244
Impact of Crematorium	0	(250)	(500)
Existing savings	(1,079)	(1,079)	(1,079)
<b>Total Change in Pressures</b>	<b>30,597</b>	<b>40,320</b>	<b>49,369</b>
<b><i>Funding Sources</i></b>			
Business Rates Income	(8,396)	(7,492)	(7,492)
Council Tax Income	(5,963)	(9,953)	(13,868)
Revenue Support Grant	(1,442)	(1,442)	(1,442)
Public Health Grant	0	0	0
Specific Grants Service & New homes bonus	1,813	3,371	4,081
Social Care grants received	(5,339)	(5,339)	(5,339)
<b>Total Change in Funding</b>	<b>(19,327)</b>	<b>(20,855)</b>	<b>(24,061)</b>
Change in drawdown from Reserves	971	971	2,604
<b>POTENTIAL TOTAL FUNDING GAP</b>	<b>12,241</b>	<b>20,436</b>	<b>27,912</b>

## **BUDGET RISKS**

### **Cost of Living Crisis**

- 3.21 The cost-of-living crisis is likely to continue to impact the Council as the rate of reduction in inflation levels remains slow and interest rates are held to reduce the impact of inflation both of which will erode our purchasing power. The impact of the crisis, on our residents, is also having a knock-on effect on the Council's finances and could lead to increased debt levels as well as a higher level of support required through schemes such as Local Council tax support, which is funded through the collection fund, therefore reducing Council tax income.

### **Social Care**

- 3.22 Demand for Social Care continues to pose financial pressure across all local government and Waltham Forest is no exception. There continues to be significant and increased pressure on Adults Social Care and Childrens placements. There has been an increase in demand, the numbers of service users receiving care, along with an increase in complexity of need and the ongoing pressure from providers costs from inflation, the cost of living and the impacts of London Living Wage. This area is very volatile so a detailed review each month is carried out to refresh the forecasts.

### **Housing General Fund**

- 3.23 Across London, homelessness presentations have been rising for some time. In April 2023 (the most recent benchmarking point), presentations were 9.4% higher than a year earlier. The number of households living in TA has increased by 5.7%, and the number of B&B units in use was up 61.8%. The number of London families in B&B for over 6 weeks increased by more than 780%.
- 3.24 The growth in TA usage reflects both an increase in demand and a reduction in suitable housing supply. Councils are struggling to procure or retain suitable accommodation. Average weekly TA rates were 15.1% (£45.82) higher in April 2023 and the pace at which rates are increasing is growing. Local Housing Allowance (LHA) rates, the amount of benefit people can claim towards housing costs, remain frozen at 2020 levels.

### **Budget Strategy Reserve**

- 3.25 The Council maintains a Budget Strategy Reserve (BSR) to allow it to manage risk and smooth out any fluctuations in government funding from one year to the next. On 1<sup>st</sup> April 2023, the balance of Earmarked reserves was £69.402 million and BSR was at £14.129 million.
- 3.26 A review of reserves was undertaken over the Autumn and is currently being finalised. This is identifying reserves that are no longer required for their original purpose and will be transferred into the BSR to mitigate future risk and allow for investment in the transformation project. The outcome of this review will be included in the 2024/24 Budget Report as part of the Reserves Strategy.
- 3.27 It is the s151 Officer's opinion that, despite the current financial uncertainty, there are sufficient resources in the BSR to support the MTFs in 2024/25 should it be required. However, this is not a sustainable solution in the long term and this is why the Senior Management Team are developing savings proposals and management actions to reduce expenditure and mitigate future risks.

### **Approach to Budget Strategy**

- 3.28 The Council is taking a 2-stage approach to the MTFs to manage the financial uncertainty by reviewing current expenditure and income to reduce in year expenditure and find short term reduction followed by a longer term transformation programme.
- 3.29 A broad timetable for reporting on progress is set out below:



<b>Group</b>	<b>Month</b>	<b>Comments</b>
Budget and Performance Scrutiny	30 <sup>th</sup> November 2023	MTFS refresh paper
Cabinet	7 <sup>th</sup> December 2023	MTFS Refresh paper and Fees & Charges report
Council	14 <sup>th</sup> December 2023	Fees & Charges report
Provisional Settlement and other funding announcements	Late December 2023	Finance to report impact of provisional settlement MTFS savings gap
Budget and Performance Scrutiny	20 <sup>th</sup> February 2024	Scrutiny of proposals and MTFS
Cabinet	22 <sup>nd</sup> February 2024	Approval of 2023/24 budget and MTFS
Full Council	29 <sup>th</sup> February 2024	Approval of 2023/24 budget and MTFS

#### **4. OPTIONS & ALTERNATIVES CONSIDERED**

- 4.1 The Council has a legal duty to set a balanced budget and to develop a financial strategy for the medium term. The revised MTFS sets out potential challenges facing the Council in future years.

#### **5. COUNCIL STRATEGIC PRIORITIES (AND OTHER NATIONAL OR LOCAL POLICIES OR STRATEGIES)**

- 5.1 The budget setting process aligns resources to the Council's priorities. This is essential to ensure that the Council's reduced financial resources are targeted to meet the needs of our residents.

#### **6. CONSULTATION**

- 6.1 Reviewing and updating the MTFS is a significant part of the process that leads up to the setting of the council tax for 2023/24. Appropriate consultation has taken place during this process, through the authority's consultation mechanisms.
- 6.2 In addition, the Council engages with the business rates sector on the overall budget strategy ahead of the council tax setting process. There is also regular engagement with residents through various fora on the overall council priorities and financial strategy.

## **7. IMPLICATIONS**

### **7.1 Finance, Value for Money, and Risk**

- 7.1.1 It is essential that the Council achieves a balanced budget that is sustainable for each financial year over the MTFS period. Experience has shown that early planning helps secure financial certainty over the deliverability of savings proposals. It is important that approved savings are delivered in full to maintain the robustness of the budget strategy. Progress will continue to be closely monitored and reported to Cabinet through the normal revenue monitoring process report.
- 7.1.2 The current refresh of the MTFS includes several assumptions (i.e., paragraphs 3.18 and 3.19) but actual certainty on funding for 2024/25, will not be available until the provisional settlement in December.
- 7.1.3 There also remains considerable uncertainty over future funding. The Government has deferred a redesign of the local government funding model and it now seems unlikely to happen until 2026/27. It is likely the redesign of the funding model could also include the 2021 census data. There has been a recent consultation on changes to the Business Rates Retention scheme that is likely to impact additional funding we receive in relation to business rates. It is therefore unclear how changes in the funding formula will affect different classes of authority or where they are geographically. The government's commitment to "levelling up" creates further risk.
- 7.1.4 The current financial position of the Council is challenging but stronger compared to other London Boroughs. As a result, the Council is taking action now to develop a range of budget management activities focusing on managing down current spend and developing a transformation programme that will ensure long term financial sustainability.

### **7.2 Legal**

- 7.2.1 As in previous years the purpose of the MTFS is to pull together in one place known factors affecting the Council's financial position and financial sustainability over the medium term. The attached MTFS sets out the proposals to balance the financial implications of the Council's objectives and policies against national and local constraints in resources. This in turn feeds into services plans for delivery and savings. Looking in such detail now at the financial challenges provides a sufficient timescale against which to assess the options for service delivery, consult as necessary and carry out such other steps as may be required to implement the proposals.
- 7.2.2 The Council agreed the budget on 2 March 2023 and pursuant to the Local Government Act 2000 and Regulations made thereunder Cabinet decisions must remain within the framework agreed. Any indicative proposals for future years are not binding until agreed within the relevant budget framework.
- 7.2.3 Decisions flowing from this report to implement the Council's budget strategy will require adherence to the relevant decision-making processes. In making any decision regard must be had to any relevant statutory provisions and

administrative rules by taking into account relevant considerations and ignoring those which are irrelevant. Regard will be had to the Council's statutory duties, its vision and priorities as set out in Waltham Forest's refreshed corporate strategy and the financial constraints faced.

- 7.2.4 Regard must also be had to the Council's fiduciary duties which require the interests of Council/Business Taxpayers to be fairly balanced against the benefit/beneficiaries of a course of action. Additionally, increasingly in public decision making the concept of proportionality is a factor. This will form the overarching framework for formulating and implementing the courses of action required to achieve savings and deliver the Council's outcomes within the budget.
- 7.2.5 Where there are proposals for a reduction to a service which the Council is either under a statutory duty to provide, or which it is providing in the exercise of its discretionary powers and there is a legitimate expectation that it will consult, then consultation with all service users will be required before any decision to implement the proposed saving is taken. Consultation should occur when proposals are at a formative stage, give sufficient reasons for any proposal to permit consideration and allow adequate time for consideration and response. Whilst the Council does not have to follow the outcome of the consultation it must be able to show that the decision maker has considered the consultation responses before taking the decision.
- 7.2.6 Whether to consult will depend on the issues, the nature and the impact of the decision and whether interested groups have already been engaged in the policy making process. Consultation may not be required for minor changes or matters with minimal impact or where adequate consultation has already taken place. However, where there is a more significant impact such as services are stopping or reducing then the more likely it is that the views and concerns of those affected should be consulted upon before a decision is taken. Likewise, if we have either promised to consult or ordinarily would do so that may give rise to a legitimate expectation that we will do so again.
- 7.2.7 Where the proposed savings will have an impact affecting staff, the Council will consult the staff affected and their representatives under its change management policies.
- 7.2.8 The Secretary of State has the power to designate two or more "relevant authorities" as a pool of authorities for the purposes of the provisions of Schedule 7B of the Local Government Finance Act 1988. The Council is a 'relevant' authority for the purposes of the Act.
- 7.2.9 Local authorities have a power to enter into arrangements between them including under section 111 of the Local Government Act 1972 which provides that, subject to any other restrictions, a local authority shall have power to do anything (whether or not involving the expenditure, borrowing or lending of money or the acquisition or disposal of any property or rights) which is calculated to facilitate, or is conducive or incidental to, the discharge of any of their functions.

### **7.3 Equalities and Diversity**

7.3.1 The Equality Act 2010 requires public authorities to have due regard to the need to eliminate discrimination and advance equality of opportunity. The Council must further take into account its wider Public Sector Equality Duty (PSED) under s.149 of the Equality Act 2010 when making its decisions. The public sector equality duty (s.149, Equality Act 2010) requires the Council, when exercising its functions, to have “due regard” to the need to: eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act, advance equality of opportunity between those who share a “protected characteristic” and those who do not share that protected characteristic and foster good relations between persons who share a relevant protected characteristic and persons who do not share it (this involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding).

7.3.2 The Council will consider the impact of changes that might arise as a result of implementing the proposals for change arising out of its budget strategy on those with protected equality characteristics, in particular, where there is likely to be an impact on residents or service users from changes or any decommissioning of existing services. Individual proposals will be subject to a full equality analysis wherever relevant, prior to any decision taken to proceed, including the identification of mitigating action where possible. Where there is any potential impact on staff, the agreed HR procedures will be followed.

### **7.4 Sustainability (including climate change, health, crime and disorder)**

7.4.1 None at this stage.

### **7.5 Council Infrastructure**

7.5.1 None at this stage.

### **BACKGROUND INFORMATION (as defined by Local Government (Access to Information) Act 1985)**

None