

## Appendix 3

# **Investment Strategy (For Non-Treasury Investments)**

Warwickshire County Council

2025/26

## **1. Introduction**

- 1.1 Local Authorities may make investments of two types:
- Treasury Investments.
  - Other Investments (also referred to in this strategy as “non-treasury investments”).
- 1.2 This Investment Strategy covers “Other Investments” and is prepared according to statutory guidance issued under the Local Government Act 2003, the Treasury Management Code of Practice, and The Prudential Code for Capital Finance in Local Authorities. Non-Treasury Investment are policy investments made to deliver corporate objectives as set out in the Capital Strategy and Medium Term Financial Strategy.
- 1.3 For the purposes of this Investment Strategy, an investment is any financial or non-financial asset of the authority which is held partially to generate a return. Investments include loans made by the local authority to wholly owned companies or associates, to a joint venture, or to a third party. the strategy does not include pension fund or trust fund investments which are subject to separate regulatory regimes, or treasury investments which are detailed separately in the Treasury Management Strategy.
- 1.4 Non-treasury management investments may take a number of forms, for example holding shares in companies, issuing loans to companies, promoting economic development, or holding non-financial assets (e.g. property). Details of the Council’s existing and planned non treasury investments are set out in Section 12 and 13 of this strategy.

## **2. Transparency and Democratic Accountability**

- 2.1 This Investment Strategy is a public document and must be approved annually by full Council, and any material changes during the year also being presented to Council for approval.
- 2.2 The more specific and detailed governance arrangements for any new funds will also be subject to Member approval through Cabinet or Council, for example, arrangements for the governance of the Warwickshire Property and Development Group (WPDG) and Warwickshire Investment Fund (WIF).
- 2.3 Under Regulation 17 of The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 as amended overview and scrutiny committee members have right of access to any confidential information relating to any decision by the executive or any member of the executive of their council where relevant to a review or scrutiny being undertaken by the committee or included in its work programme.

- 2.4 Any fundamentally new or additional levels of investment outside of those specified in or delegated by this Investment Strategy for investment for non-treasury purposes will be required to have direct Council approval that would be set out in an updated Investment Strategy.
- 2.5 The Section 151 Officer has delegated authority to implement this Investment Strategy, with the following overarching responsibilities highlighted.
- Ensuring that due diligence is carried out on investment proposals in accordance with the risk appetite of the authority.
  - Ensuring the proportionality of investments so that the authority does not undertake a level of investing which exposes the authority to an excessive level of risk compared to its financial resources.
  - Ensuring an adequate governance process is in place for the approval, monitoring, and ongoing risk management of non-treasury investments.
  - Ensuring that the Council has adequate expertise, either in house or externally provided, to carry out the above
  - Maintenance of Treasury Management Practices which specifically deal with how non treasury investments will be carried out and managed.

### **3. Investment Objectives**

- 3.1 The primary objective of all non-treasury investments will be to contribute towards the Council's three strategic priorities for Warwickshire to be:
- "A county with a vibrant economy and places with the right jobs, skills, and infrastructure";
  - "a place where people can live their best lives; where communities and individuals are supported to live safely, healthily, happily and independently"; and
  - "a county with sustainable futures which means adapting to and mitigating climate change and meeting net zero commitments., so that our generation ensures future generations can live well and reap the benefits of a sustainable and thriving Warwickshire."
- 3.2 In addition, all Non-Treasury investments will be required to demonstrate how they contribute towards the objectives specified in the Ministry of Housing, Communities and Local Government (MHCLG) guidance which will control local authority access to Public Works Loan Board (PWLB) lending by the withdrawal of PWLB lending to authorities when not met. MHCLG's objectives align well with the Council's overarching strategic objectives and powers, and are summarised below and detailed in Annex 1:

- Service;
- Housing;
- Regeneration;
- Treasury management; and
- Prevention of social or economic decline.

3.3 The principles of security, liquidity, and yield must be considered when making any investment. When considering treasury management investments, security is the highest priority, followed by liquidity, and yield is a low priority. However, for non-treasury investments, whilst all three principles matter, there is more flexibility around the relative priorities depending upon risk appetite and investment objectives. The following sections set out these principles in detail.

## 4. Security

- 4.1 The principle of security relates to the preservation of capital, i.e. ensuring that the original investment is returned.
- 4.2 Non-treasury investments will be categorised as a means of indicating and controlling risk as follows:
- Specified Investments;
  - Loans; and
  - Non-Specified Investments.
- 4.3 Annex 2 describes these in detail and Annex 3-5 sets out how these will be managed.
- 4.4 Total exposure to investments will be capped as specified by this Investment Strategy, including detailed limits specifying ceilings on different types of investment, in order to limit risk exposure. This is summarised in Section 11 and detailed in Annex 6 and Annex 7.
- 4.5 All investments will have a specified end date and a documented process for review and, where contractually possible, early closure and realisation of capital should the circumstances performance, or risk profile require it. Investments which are of a nature that do not have a contractual end date, for example equity, will still have a planned holding duration.
- 4.6 Investment cash or non-treasury assets will not be issued in advance of need, minimising third party treasury management risk and the risk of cash or assets being used for objectives other than the investment objective.

## **5. Liquidity**

- 5.1 The principle of liquidity relates to how quickly investments can be returned to the Council.
- 5.2 In order to manage liquidity risk, this Investment Strategy will specify the maximum durations for which financial investments may be committed.
- 5.3 While the default arrangement for loans will be annuity repayments, i.e. the payment of principal in even instalments throughout the duration of the loan term, other repayment profiles, including loans on maturity, may be considered. The risk of alternative profiles must be evaluated alongside how the profile would help to meet organisational objectives.
- 5.4 The contractual terms of investments made will specify repayment conditions and timing.
- 5.5 For non-treasury investments, medium and long-term financial planning will be used to ensure that funds can be accessed when needed to repay capital borrowed.
- 5.6 The level of liquidity of non-treasury assets will be assessed and monitored.
- 5.7 The capital programme, capital financing requirement, and treasury management activity will have regard to the planned repayment of investments relating to non-treasury investments, for example capital receipts and the repayment of loan principal.
- 5.8 The new investments in the Warwickshire Property and Development Group (WPDG) will be relatively long term and illiquid in nature. Annexes 2 to 8 set out arrangements and controls which will be used to manage this risk.

## **6. Yield**

- 6.1 Investments will not be made purely or primarily for yield. This will ensure that the Council will have access to Public Works Loan Board (PWLB) lending at the low rates available from this source. Should the Council want to consider investments purely or primarily for yield, this would require a review of the overall capital financing position for the Council, because the Council would lose access to PWLB rates and capital financing costs would foreseeably be expected to increase.
- 6.2 However, where investments are made, the expected rates of return will have regard to the nature of investment and the level of risk been taken by the Council. Investment returns cannot be so low as to breach subsidy rules and

cannot be so high as make an appropriate investment unviable to appropriate counterparties. Investment returns will seek to align with market norms.

- 6.3 Net yield will be calculated after having regard to costs, fees, and expected credit loss calculations.

## **7. Borrowing**

- 7.1 The Council will not borrow purely for profit and will not borrow more than or in advance of need purely or primarily to profit.
- 7.2 However, the Council may borrow in advance of need primarily for risk management or borrowing efficiency reasons (for example to lock into low interest rates if interest rates are expected to rise significantly).
- 7.3 Capital receipts shall not be repurposed from the acquisition of assets that contribute to service delivery in order to fund the purchase of investments solely to avoid borrowing in advance of need.

## **8. Risk**

- 8.1 Any investment, by its nature, involves a risk that the rate of return may not be achieved, and the original investment may not be repaid. It also carries the potential risk that more than the original investment is lost if an investor for whatever reason subsequently puts additional money in above the original investment, for example if unsuccessfully attempting to turn around a failing investment.
- 8.2 The financial risks involved in the non-treasury investments relating to the WPDG and WIF are of a different nature and greater than the financial risks relating to traditional capital expenditure and treasury investments. The reasons for the differences are:
- Treasury investments prioritise security and liquidity in order to serve the primary objective of treasury management which is to ensure that cash is available when needed to serve the purpose for which that cash is held. To achieve this treasury objective, relatively safe and secure investments are chosen, and consequently low rates of return are accepted.
  - Traditional capital spending is expenditure by nature and is fully funded as such. A capital asset provides benefits over its financial life and the cost of the asset is spread across the life of the asset, reflecting its consumption and use. At the end of the life of the asset, a new asset would be required if the same benefits are required to continue, and in order to pay for a new asset new money is needed. This new money is prudently provided for by

the Council making an annual provision called the Minimum Revenue Provision (MRP). This means that money will be available to purchase a new asset when the time comes. There is no assumption that the asset will retain its financial value, or that the asset will provide a financial return, and therefore there is no risk of either of these assumptions not happening.

- Non-Treasury investment risks are different in that:
  - They are assumed to retain or increase their original asset value, and they are assumed to provide a financial return. Therefore, there is exposure to the risk of those assumptions not happening.
  - The objectives of non-treasury investments by their nature are not the same as treasury investments, and therefore they may not prioritise security and liquidity as highly as treasury investments do.

8.3 Although the Council will not pursue investments purely for the objective of financial return, the Council will pursue investments in order to meet objectives as set out in Section 3, and in doing so accepts higher risks with respect to security and liquidity.

8.4 Higher risk is associated with higher reward. Investors will seek to find opportunities receiving higher returns for lower risk, while organisations seeking investment will seek opportunities paying lower returns for higher investor risk. These competing requirements result in a market-norm rate of return for a given level of risk. Rates of return will have regard to this, ensuring that rates of return are not so low as to breach subsidy rules and not so high as to be unviable to counterparties. Rates should be market normative and enough to reward the investment risk taken.

8.5 The majority of traditional treasury management investment is very low risk, for example loans to other local authorities, and money market funds designed to preserve capital. There are some small investments in higher risk investments including the Threadneedle Social Bond Fund (currently £29m) and CCLA Property Fund (currently £10m). These two investments are held over a longer timeframe in order to provide access to higher rates of interest in return for accepting less liquidity and higher risk. The WPDG and WIF investments will be further up the risk/return spectrum, however this positioning is driven by the objectives of the WPDG and WIF being different to treasury management objectives.

8.6 Before entering into an investment, and whilst an investment is in place certain protocols will be followed to manage risks. These are detailed in Annex 3.

## **9. Proportionality**

- 9.1 Any particular investment will carry its own risks, driven by the investment itself and the counterparty it relates to. The risk and return associated with any particular investment will vary.
- 9.2 In addition, there is the aggregate risk that the Council is exposed to when considering all investments in totality. This is a function of the total amount of assets and income at risk of loss, and the extent to which the Council is dependent upon those assets and that income.
- 9.3 This Investment Strategy sets out maximum limits for non-treasury investments in order to limit total risk exposure.
- 9.4 The Medium-Term Financial Strategy sets out the extent to which the overall Council budget is supported by income from non-treasury investments. However, when considering exposure to financial risk, there is also the risk of loss of principal, and where this occurs this may impact on the income and expenditure account directly.
- 9.5 Two indicators are required by Government guidance to be used to set limits that cannot be exceeded in order to manage proportionality. These measures are:
- Gross debt as a proportion of net service expenditure; and
  - Commercial income as a percentage of net service expenditure.
- 9.6 These measures are incorporated into the indicators detailed in Annexes 5 and Annex 6.

## **10. Capacity, Skills and Culture**

- 10.1 Non-Treasury investments carry particular risk, and the nature and scale of proposed investments in the WPDG and WIF create new risks. We will ensure we have the appropriate capacity, culture, and skills to manage non-treasury investments through a range of specific actions and policies as set out in Annex 4.

## **11. Prudential Indicators and Limits**

- 11.1 A range of measures will be used to report on and control exposure to financial risks from investment decisions. Annex 5 sets out definitions of the measures that will be used.



- 11.2 Measures are classified as either “Indicators” or “Limits” and the distinction is set out below:
- Indicators (Annex 6) – these are measures to monitor a particular financial parameter which will provide insight into performance and/or risk.
  - Limits (Annex 7) - these measures which set hard limits on certain financial parameters in order to control and limit exposure to risk.
- 11.3 The most important measures are the limits on gross investment set out in Annex 7. These provide the fundamental control over maximum exposure to risk.
- 11.4 Over time, the use of measures will be reviewed and measures that are initially used for monitoring purposes may in the future used for control purposes.
- 11.5 The measures used, and any targets or limits, will be updated at a minimum annually when the Investment Strategy is updated.
- 11.6 The indicators have been chosen having regard to MHCLG guidance.

## **12. Warwickshire Property and Development Group**

- 12.1 In 2019/20, Council approved a commercial strategy setting out the intention to explore new approaches to the delivery of organisational objectives.
- 12.2 During 2021/22, the Warwickshire Property and Development Company (WPDG) was launched and WPDG drew down the working capital facility provided by the Council.
- 12.3 During 2022/23, WPDG has drawn down scheduled payments of the first capital (development) loan.
- 12.4 During 2023/24, WPDG has drawn down a second development loan, repaid its first development loan and drawn down a further management loan.
- 12.5 During 2024/25, WPDG continued to draw down on their working capital facility and another development loan was approved.
- 12.6 WPDG was originally launched with the following objectives:
- To undertake regeneration and place making activities within the county of Warwickshire. This should include delivery of major schemes, prioritising regeneration activities and delivering specific regeneration plans across the county.

- To undertake activities that progress Warwickshire County Council's key policy objectives, for example mitigating climate change, promoting sustainable and inclusive economic growth in Warwickshire, improving quality of life, and improving Warwickshire's 5G network and connectivity.
- To undertake activities with a view to generating new short- and long-term financial returns from the Council's property assets as appropriate and establishing and maintaining momentum in such activities.
- To operate in effective partnership with public sector stakeholders, in particular district and borough councils, NHS bodies, Warwickshire Police, universities, West Midlands Combined Authority, and Homes England.

12.7 WPDG investments may be of the following nature:

- Equity Investment;
- Commercial Loans;
- Corporate Guarantees; and
- Partnerships (Joint Venture).

12.8 The value of any loan guarantees will be included in counting of the total value of loans issued as they allow a third party to call on a loan unilaterally.

12.9 Any investments of a convertible nature between equity and debt will be counted as the actual type of investment that they are at the given time.

12.10 For the management of risk, limits will be set by the Investment Strategy controlling the following:

- How much can be invested in each year;
- How much may be equity, capital, and revenue in nature; and
- The maximum duration of investments will be as set out in the detailed business plan.

12.11 Annex 7 specifies the limits for investment in the WPDG. These limits are specific for the next year, and indicative for the following 4 years.

12.12 The WPDG business plan includes potential investments over a significantly longer period of time, however actual approval is subject to viable detailed business cases for each individual investment and is also subject to the approval of an Investment Strategy with appropriate investment limits being approved at the necessary time. For completeness, the indicative total gross investment profiles proposed for the WPDG are set out in the table below. The table shows the *planned* investment.

12.13 Annex 7 also sets out the *maximum* investment per year. The headroom this provides enables the Council and the company to function efficiently and effectively without the need for disproportionate governance approvals should circumstances change or opportunities arise, but at the same time keeping a hard limit to provide Council with certainty and assurance as to the maximum level of investment exposure that could be taken without further approval from members.

**Table 1 – WPDG Gross Investment**

<b>Indicative Gross Investment-</b>	<b>2025/26 £000</b>	<b>2026/27 £000</b>	<b>2027/28 £000</b>	<b>2028/29 £000</b>	<b>2029/30 £000</b>	<b>Total £000</b>
Equity	11,952	14,929	24,274	10,648	3,824	65,627
Working Capital Loans (Revenue)	1,202	-	-	-	-	1,202
<b>Total</b>	<b>13,154</b>	<b>14,929</b>	<b>24,274</b>	<b>10,648</b>	<b>3,824</b>	<b>66,829</b>

12.14 All individual investments will be subject to approval of bespoke business cases and due diligence as required by the specified governance arrangements.

12.15 The investment profile will be updated each year on a rolling basis. For example, before the actual investment limits for 2025/26 are proposed in the next annual Investment Strategy, they will be informed by experience to date of investments made in 2024/25.

### **13. Warwickshire Investment Fund**

13.1 A business case and strategy have been approved by Council in June 2021 to set up a Warwickshire Investment Fund (WIF) with the objective of providing finance to support business start-ups and business growth within Warwickshire and supporting the Council's strategic goals and priorities as set out in the Warwickshire Council Plan, Covid 19 Recovery Plan, Economic Strategy, Commercial Strategy, and Place Shaping Programme.

13.2 A revision to the WIF business case and strategy to be presented to Cabinet in January 2025 with updated investment levels for the two pillars of the fund.

13.3 Although the primary objective of this fund is to deliver service objectives (specific examples being job creation and job safeguarding, leveraging additional resources funding into the County, and increasing social value) the fund will operate on a commercial basis and will therefore plan to generate financial returns for the council.

13.4 The business plan and investment strategy for this specific fund must fit within all of the controls and governance requirements set out in this overarching Non-Treasury Investment Strategy. For the avoidance of doubt, should there

be any difference this strategy/policy would prevail, and should there be a need or desire to invest outside of the boundaries set out in this policy, that would require bringing this policy back to Council to approve the changes first. In this way members and Council retain direct control of the overall level of risk being taken.

13.5 There are two years remaining in the current WIF. The WIF investment strategy and business case for 2025/26 outlines a proposal for a comprehensive approach to assessing the WIF's impact and exploring future options for 2027/28 and beyond.

13.6 Annex 7 sets out the limits on gross investment within each fund each year. Following a review of the WIF, changes have been made to the original WIF plan. These limits are designed to control exposure to risk. The WIF is made up of three sub funds with different risk profiles and therefore each sub fund has its own limit as follows:

	Maximum Investment: over remaining 2 years of WIF (£000)	Total Investment of Fund (all years) (£000)
Property and Infrastructure Fund (PIF) Capital Lending	£46,200	£50,000
Property and Infrastructure Fund (PIF) Revenue Lending	£3,920	£4,000
Local Communities Enterprise Fund (LCE) Revenue Lending	£4,050	£10,000
<b>Total</b>	<b>£54,170</b>	<b>£64,000</b>

13.7 The business plan for the WIF sets out an explanation of the nature and risks to do with these funds in detail.

13.8 In addition to having a limit on the amount that can be invested over the five-year period, other constraints are also placed on investment activity in order to control exposure to risk as follows:

- Limits for the amount that can be invested in each financial year (Annex 7.3);
- Limits on how much investment may be equity or working capital loans, which carry different risk profiles to debt invested in capital (Annex 7.3, 7.4 and 7.5);
- Limits on how long a loan may stay out with a third party before it must be paid back (Annex 7.4); and

- Each fund will have tailored governance arrangements and individual investments will be assessed against specified criteria that include consideration of risk and the financial strength of the counterparty as well as the benefits in terms of delivering Council objectives.

13.9 No limits will be set on net debt however net debt will be monitored, and in addition to the monitoring of these strategic indicators there will be detailed monitoring of the investment portfolio.

13.10 A key change to WIF operations is registration with the FCA for Anti-Money Laundering (AML) purposes due to the decision-making nature of the PIF fund. This registration, following an independent review of our AML policy, is essential to ensure compliance with AML regulations and to effectively prevent money laundering. The LCE is out of scope for this requirement. This strategy outlines the approach to AML compliance, detailing measures to meet regulatory obligations, including customer due diligence, risk assessment and management, suspicious activity reporting, record-keeping, and ongoing monitoring and training.

The WIF strategy for 2025/26 introduces a proposal for a process to prepare for the period beyond the current WIF, which has two years remaining. This plan includes assessing the impact and effectiveness of the WIF, evaluating current economic needs and identifying significant shifts since the WIF was established, and assessing business needs and economic support requirements for 2027/28 and beyond.

## **14. Other Non-Treasury Investments**

14.1 The Council already holds a number of investments that are non-treasury by nature. These investments are managed under existing procedures and protocols. This section sets out these investments.

### ***Company Shares***

14.2 The Council currently holds shares and debt with the following companies for the purposes of promoting the achievement of organisational objectives. These companies may provide a return on investment but that is not the primary reason for their existence.

- Warwickshire Legal Services Trading Ltd
- Educaterers Ltd
- University of Warwick Science Park Innovation Centre Ltd
- Warwick Technology Park Management Company Ltd
- Warwick Technology Park Management Company (No2) Ltd
- Eastern Shires Purchasing Organisation (ESPO)
- SCAPE Group Ltd

- Coventry and Warwickshire Waste Disposal Company
- Local Capital Finance Company Ltd
- UK Municipal Bond Agency PLC
- Border to Coast Pension Partnership Ltd

14.3 The share value relating to the above companies recorded in the 2023/24 accounts was £3.2m, with dividend income of £1.3m.

### **Company Loans**

14.4 In addition to the above the Council currently operates two wholly owned Local Authority Trading Companies:

- Warwickshire Legal Services Trading Ltd; and
- Educaterers Ltd.

14.5 There is a £1.8m loan facility in place with Educaterers at a rate of return that tracks base rate to provide support to the company's cash flow.

14.6 Local authority-controlled company activity has been an area of particular interest to CIPFA and the government, CIPFA has been developing further guidance around the governance of these entities, including the publication of the "Local Authority Owned Companies: A Good Practice Guide. Additionally, the 2023/24 edition of the Code of Practice on Local Authority Accounting provides updated guidance on key accounting changes relevant to local authority companies. We use this guidance as a form of best practice to continuously improve our governance frameworks.

The capital programme already includes allocations available for the purposes of making loans to local businesses who cannot raise funds through other means such as banks. This includes the following capital programme forecast for 2024/25.

Table 2 – Capital Programme Loans

<b>Forecast</b>	<b>Earlier Years £000</b>	<b>2024/25 £000</b>	<b>2025/26 Onwards £000</b>	<b>Total Balance £000</b>
Capital Growth Fund Business Loans and Grants	2,217	55	228	<b>2,500</b>
Capital Investment Fund/Duplex Fund	2,000	-	-	<b>2,000</b>
Capital Investment Fund/Small Business Grants	1,543	93	328	<b>1,964</b>
<b>Total</b>	<b>5,760</b>	<b>148</b>	<b>556</b>	<b>6,464</b>

- 14.7 Loans and grants are managed via the Coventry and Warwickshire Reinvestment Trust (CWRT), this includes arrangements for assessing loans, issuing loans, and recovery.

***Property Investment***

- 14.8 The Council does not currently invest in property for the purposes of generating commercial income, however the Council does currently hold some assets for the purpose of generating future capital receipts.

**Table 3 – Property Investment (Asset Value)**

	<b>31/03/2024 £000</b>
ALCESTER/Former Area Library, Priory Road	300
DUNCHURCH/Blue Boar Farm, Lawford Heath Lane	920
Former Priory Medical Centre	827
Kineton/ River Meadows Care Home	117
NUNEATON/Former Manor Park Community School, Beaumont Road	417
NUNEATON/Land Adjoining 51 Queens Road, Queens Road	7
NUNEATON/Land at former Magistrates Courts, Vicarage Street	277
RUGBY/Great Central Industrial Estate, Great Central Way	1,843
Attleborough Fields Industrial Estate Slingsby Close	753
ARLEY/ARC School (Former Herbert Fowler Junior School)	1,291
DUNCHURCH / Blue Boar Farm	1,200
DUNCHURCH / Blue Boar Farm (Holding S13/1)	45
WOLSTON / South Lodge Farm	1,960
ALCESTER/Meadow View H.E.P. (Independently funded), Kinwarton Road	894
WARWICK/Land at Heathcote Hill Farm (Europa Way)	96
BEDWORTH/Former Manor Park School Playing Field	192
WARWICK/Land at Fusiliers Way (Retained Development. Land)	1,437
<b>Total</b>	<b>12,576</b>

- 14.9 The value of these assets can change, and these assets generate a small amount of incidental income (approximately £224k in 2023/24). The properties classified as investment property had an asset value of £12.6m as at March 2024, which is 0.9% of the total fixed asset value in the balance sheet of £1.4bn.

- 14.10 In future, should any of these assets transfer to WPDG for development, the governance arrangements in place for the WPDG will apply.

## **Local Climate Bonds**

- 14.11 As part of our commitment to innovative and sustainable financing, we are seeking to establish the facility to use of Local Climate Bonds (LCBs), also known as Community Municipal Investments (CMIs), in future should they be an appropriate funding source for specific investment in the Council's sustainable futures priority. The TMSS (Appendix 2) is seeking in principle approval for the use of this type of instrument. However, until a full strategy and business case is presented and approved by the Council (or any body with delegated authority), LCBs will not be enacted. The TMSS (Appendix 2) outlines the next steps for LCBs.
- 14.12 LCBs are a form of non-treasury investment designed to raise funds specifically for environmentally sustainable projects. The funds raised through LCBs will be dedicated to financing projects that address climate change and promote environmental sustainability, such as renewable energy installations, energy efficiency improvements, natural flood management, and other green initiatives.
- 14.13 The use of LCBs aligns with our Climate Change objectives, by incorporating LCBs into our borrowing strategy, we aim to leverage innovative financing solutions to support our objectives. We will update the Investment Strategy accordingly once the full LCB business case and strategy is approved by Cabinet.

## **15. Environmental, Social, and Governance Policy**

- 15.1 As a responsible investor, the Council is committed to considering environmental, social, and governance issues, and has a particular interest in taking action against climate change and pursuing activities that have a positive social impact.
- 15.2 The impact of an investment in respect of climate change may be a consideration for investment decisions, with investments that help to prevent climate change, or help to cope with its impact, or which are resilient to its effects being desirable. Measurement of impact such as via carbon footprint will be undertaken where practical.
- 15.3 Investments that have a social impact benefit, either on a local scale or more widely may be considered.
- 15.4 The ESG policy of fund managers and investment partners may be considered when making decisions, with the preference being for fund managers and partners who share similar values around ESG.



## Public Works Loan Board – Lending Objectives

Type	Description
Service	Normal local authority capital spending, for example education, highways, transport, social care, public health, cultural services, environmental services, regulatory services, and Fire and Rescue Services, as would be captured in the MHCLG Capital Outturn Return.
Housing	Normal local authority general fund or housing revenue account activity, as would be captured in the housing sections of the DLUHC Capital Outturn Return. In principle this includes land release, housing delivery, and subsidising affordable housing.
Regeneration	<ul style="list-style-type: none"> <li>• Addressing economic or social market failure by providing services, facilities, or other amenities of value to local people which would not otherwise be provided by the private sector</li> <li>• Preventing negative outcomes including through buying and conserving assets of community value that would otherwise fall into disrepair</li> <li>• Investing significantly in assets beyond the purchase price, developing assets to improve them and/or change their use.</li> <li>• Generating significant additional activity that would not otherwise happen without the local authority's intervention, for example creating jobs and/or social or economic value.</li> <li>• Investments that recycle income to related projects with similar objectives rather than income being applied to wider services</li> </ul>
Treasury Management	Restructuring or extending existing debt from any source, including the restructuring of internal financing
Prevention of Social or Economic Decline	<ul style="list-style-type: none"> <li>• Investments that prevent a negative outcome, for example conserving assets of community value that would otherwise fall into disrepair or providing support to maintain economic activity that would otherwise cease.</li> <li>• Investment where there is no realistic prospect of support from any other source.</li> <li>• investments with a defined exit strategy so that investments are not held for any longer than is necessary to achieve their objective</li> </ul>

DLUHC issued guidance following the 2020 PWLB consultation stating that authorities that invest make non-treasury investments for the above reasons will have access to PWLB lending.

Local authorities that choose to invest for other reasons, or who choose to invest purely or primarily for yield will not be allowed to access PWLB lending for a period of time. In these cases, lending will be available from other sources, however it is foreseeable that the credit rating and risk profile of a local authority will be adversely impacted where it been refused access to the PWLB, and this would foreseeably impact on the lending rates and terms made available to the local authority.

## Investment Categories

Investment Type	Description
Specified Investments	<p>Generally lower risk. These are sterling denominated, short-term, not capital by nature, and are made with counterparties with high credit ratings.</p> <p>The Investment Strategy, will use the same criteria for the determination of specified investments as the Treasury Management Strategy</p>
Loans	<p>Generally higher risk than specified investments. In order to mitigate risk:</p> <ul style="list-style-type: none"> <li>• Credit risk and expected credit loss models will be used for loans and receivables.</li> <li>• Documented credit control arrangements will be used.</li> <li>• The value of loan guarantees will be counted against total lending exposure, whether or not a loan facility has been fully utilised.</li> <li>• Where a loan may be convertible to equity this can only be at the Council's discretion. No loans will be offered with any contractual commitment to convert them to equity.</li> </ul>
Non-Specified Investments	<p>This category covers all investments which are not specified investments, for example equity.</p>
Non-Treasury Investments	<p>This relates to physical assets which can be realised to recoup the capital invested. In order to mitigate risk:</p> <ul style="list-style-type: none"> <li>• The Council will monitor on an annual basis whether assets retain sufficient value to provide security.</li> <li>• Where security is sufficient, a statement should be made to this effect.</li> <li>• Where security is insufficient, a plan detailing the mitigating actions being taken to protect capital invested should be produced.</li> <li>• Where a loss is recognised in the accounts, the impact of this loss should be reported in an updated Investment Strategy.</li> <li>• Where the initial directly attributable purchase costs are greater than the realisable value of an asset, a statement setting out the timescales expected for the asset value to provide security for the sums invested will be made.</li> </ul>

## Risk Management

Risk	Risk Management
Business market itself is not sound	<ul style="list-style-type: none"> <li>• Review of the wider market in which the counterparty operates</li> </ul>
Counterparty is not financially sound or well governed	<ul style="list-style-type: none"> <li>• Use of independent credit ratings or credit assessments</li> <li>• Review of published financial reports and accounts.</li> <li>• Review of the wider business plans of the organisation</li> <li>• Review of the counterparty's business case for seeking Council investment</li> <li>• Undertaking bespoke due diligence on the counterparty's financial and governance position where appropriate.</li> <li>•</li> </ul>
The counterparty investment plan is not sound	<ul style="list-style-type: none"> <li>• Reviewing the specific investment business case methodology, rationale, and assumptions</li> <li>• Review of the specific market environment</li> <li>• Undertaking bespoke due diligence where appropriate.</li> </ul>
The investment is not repaid	<ul style="list-style-type: none"> <li>• Establishing security against counterparty assets where appropriate</li> <li>• Including appropriate wordings in loan agreements</li> <li>• Regular monitoring of loan repayments, with the information required from the counterparty being specified.</li> <li>• Use of credit control processes</li> <li>• Regular monitoring of counterparty financial metrics</li> <li>• Use of shareholder powers in respect of shareholdings, for example voting rights, reserved shareholder powers, board membership rights, and access to company information.</li> <li>• Utilising internal expertise and external expertise to monitor and review investment risk.</li> <li>• Where appropriate providing information, guidance, and support to counterparties to assist them in navigating difficulties in making repayments.</li> <li>• Use of the expected credit loss model to account for investments.</li> <li>• Having exit strategies built into the investment plan.</li> </ul>
The Council does not adequately understand an investment	<ul style="list-style-type: none"> <li>• Commissioning of experts and external advisers where internal expertise is not available.</li> <li>• Use of competitive procurement processes to secure external advisers.</li> <li>• Use of specified contract terms and objectives, and proactive contract management, to direct external advisers.</li> <li>• Investments in new markets or endeavours will be profiled with lower investments in the initial years to provide proof of concept and organisational learning before investment levels are scaled up.</li> </ul>

## Capacity, Skills, and Culture - Policies and Actions

	Actions
Capacity	<ul style="list-style-type: none"> <li>• For investment funds ensuring adequate capacity is resourced at conception to deliver the fund objectives.</li> <li>• For individual investments, ensuring business cases include regard to the capacity required to deliver investment objectives for the Council and the counterparty.</li> <li>• Ensuring that investment costs are accounted for and covered by gross investment returns before net returns are counted.</li> </ul>
Skills	<ul style="list-style-type: none"> <li>• An annual training plan for Members closely involved in investment governance but noting that Members are not expected to be investment experts and require appropriate support and advice from experts.</li> <li>• Specific training on the prudential framework for officers and other stakeholders involved in negotiating investments.</li> <li>• Commissioning of external expertise where internal expertise is not available.</li> <li>• The use of appropriately qualified and experienced internal staff where necessary</li> </ul>
Culture	<ul style="list-style-type: none"> <li>• Reporting to Members and senior officers of lessons learned from other local authorities, where public reports are made available.</li> <li>• Ensuring no investment or counterparty is ever perceived to be “too big to fail”.</li> <li>• Ensuring that unsuccessful investments are identified and accepted as such as early as possible and that robust decisions are taken to prevent further losses, for example by investing further into an unviable project.</li> <li>• Ensuring a positive support and challenge culture.</li> <li>• A robust culture promoting consistent application of investment controls.</li> <li>• Investment appraisals consider the long-term and the whole investment life cycle.</li> <li>• Investment funds consider intergenerational fairness.</li> <li>• Conflicts of interest are transparent and proactively managed.</li> <li>• Risk management and performance management will be evidence based.</li> </ul>

## Indicator Definitions

Title	Purpose
Gross debt as a proportion of net service expenditure  (to be monitored)	Demonstrates the scale of debt in comparison to the financial size and strength of the authority.  Indicates proportionality and whether the authority is taking too much risk in aggregate
Commercial income as a proportion of net service expenditure  (to be monitored)	Demonstrates the dependence of the authority on commercial income associated with investments.  Indicates proportionality and whether the authority is taking too much risk in aggregate.  Note this indicator only relates to commercial income associated with non-treasury investments, therefore for example it excludes income from normal trading with third parties such as schools.
Loan to value ratio  (to be monitored)	Demonstrates the amount of debt issued compared to the total associated underlying asset value.  Indicates risk of exposure to losses
Gross investment limits	To manage risk, limits will be set with respect to how much can be invested in non-treasury investments profiled across the medium term financial planning horizon at a high level and provide a more detailed limits around investment durations for investments to be made in the coming year.  Gross limits are a hard limit in-year.  Net lending will be monitored and will inform the gross limits updated for following years
Non-treasury investment net borrowing as a percentage of net financing need  (to be monitored)	Total non-treasury investments as a proportion of total capital financing requirement, assuming non-treasury related capital receipts reduce non-treasury related borrowing.
The expected net rate of return  (to be monitored)	The overall expected net rate of return for investments  This is the gross rate of return, less costs and fees, and less expected credit loss.  Returns are not risk-free, therefore higher rates of return indicate higher levels of risk

## Investment Strategy Indicators

### 6.1 Gross debt as a proportion of net service expenditure

	2025/26 £000	2026/27 £000	2027/28 £000	2028/29 £000	2029/30 £000
Gross Debt	347,072	445,504	492,989	452,279	435,678
Net Core Service Expenditure	649,337	670,517	700,613	729,802	769,851
<b>Gross debt as % of net service expenditure</b>	<b>53.5%</b>	<b>66.4%</b>	<b>70.4%</b>	<b>62.0%</b>	<b>56.6%</b>

### 6.2 Income as a proportion of net service expenditure

	2025/26 £000	2026/27 £000	2027/28 £000	2028/29 £000	2029/30 £000
WIF income	106	124	12,544	23,114	14,342
WPDG income	4,834	27,601	22,527	27,286	9,482
<b>Income (gross)</b>	<b>4,940</b>	<b>27,725</b>	<b>35,071</b>	<b>50,400</b>	<b>23,824</b>
Net Service Expenditure	649,337	670,517	700,613	729,802	769,851
<b>Commercial income as % of net service expenditure</b>	<b>0.76%</b>	<b>4.13%</b>	<b>5.01%</b>	<b>6.91%</b>	<b>3.09%</b>

These indicators demonstrate the scale of the Council's debt and the extent to which its net service expenditure is supported by income from non-treasury investments. They are important because they help assess the sustainability of the Council's debt levels and its reliance on commercial income. Monitoring these ratios ensures that borrowing and income generation remain within manageable limits, supporting service delivery without exposing the Council to excessive financial risk.

### 6.3 Loan to Value

	2025/26 £000	2026/27 £000	2027/28 £000	2028/29 £000	2029/30 £000
Total Loans (Capital)	34,992	38,089	17,585	5,658	3,824
Asset Value	to be monitored				
Loan to value					

This indicator measures the ratio of total loans (capital) to the value of the underlying assets. It is important because it helps assess the risk associated with the Council's lending activities by comparing the amount of capital loaned to the value of the

assets securing those loans. Asset values will be monitored rather than setting a fixed limit, as they will depend on lending opportunities.

#### 6.4 Non-treasury investment net financing as a % of total net financing need

	2025/26 £000	2026/27 £000	2027/28 £000	2028/29 £000	2029/30 £000
Net Financing need for the year	30,051	10,364	(10,797)	(39,752)	(20,000)
Total Net Financing Requirement	134,215	114,008	70,563	-	-
Non Treasury Borrowing as % of Total	22.4%	9.1%	(15.3%)	* n/a	* n/a

This indicator measures the proportion of the Council's total net financing requirement that is attributed to non-treasury investments. It is important because it helps assess the extent to which the Council's borrowing is directed towards non-treasury investments, ensuring that such investments remain within sustainable limits and do not overly burden the Council's overall financing strategy. From 2028/29 onwards, repayment of principal exceeds loans issues hence a net negative figure.

#### 6.5 Expected Gross Rate of Return

Approximate Average Rate of Return	
WPDG	7%
WIF – Property and infrastructure Fund	6.5%-7.5%
WIF - LCEF	6%-15%

This shows the average return that an investment is expected to generate over a specific period. It helps to understand the potential performance of investments.

## Annex 7

### Investment Strategy Plan and Prudential Limits

#### 7.1 Annual Gross Investment Plan – Medium Term

	2025/26 £000	2026/27 £000	2027/28 £000	2028/29 £000	2029/30 £000	Total £000
WPDG - Equity	-	-	-	-	-	-
WPDG - Development Loans	11,952	14,929	17,585	5,658	3,824	53,948
WPDG - Owned Property Loans	-	-	6,689	4,990	-	11,679
WPDG - Revenue Loans	1,202	-	-	-	-	1,202
WPDG - Joint Venture Equity	-	-	-	-	-	-
<b>Sub Total - WPDG</b>	<b>13,154</b>	<b>14,929</b>	<b>24,274</b>	<b>10,648</b>	<b>3,824</b>	<b>66,829</b>
WIF - LCE (Revenue)	2,200	1,850	-	-	-	4,050
WIF - PIF Fund	23,040	23,160	-	-	-	46,200
WIF - PIF Fund (Revenue)	1,960	1,960	-	-	-	3,920
Sub Total - WIF	27,200	26,970	-	-	-	54,170
<b>Total</b>	<b>40,353</b>	<b>41,900</b>	<b>24,274</b>	<b>10,648</b>	<b>3,824</b>	<b>120,999</b>

<b>Other Revenue Loans</b>	2025/26 £000	2026/27 £000	2028/29 £000	2028/29 £000	2029/30 £000
Other LATC Loans	3,000	3,000	3,000	3,000	3,000
Duplex (CWRT)	5,000	5,000	5,000	5,000	5,000
<b>Total</b>	<b>8,000</b>	<b>8,000</b>	<b>8,000</b>	<b>8,000</b>	<b>8,000</b>



### 7.2 Cumulative Gross Investment Plan – Medium Term

	2025/26 £000	2026/27 £000	2027/28 £000	2028/29 £000	2028/29 £000	2029/30 £000
WPDG - Equity	-	-	-	-	-	-
WPDG - Development Loans	15,415	30,345	47,929	53,587	57,411	111,359
WPDG - Owned Property Loans	-	-	6,689	11,679	11,679	23,359
WPDG - Revenue Loans	2,363	2,363	2,363	2,363	2,363	3,565
WPDG - Joint Venture Equity	-	-	-	-	-	-
<b>Sub Total - WPDG</b>	<b>17,778</b>	<b>32,708</b>	<b>56,981</b>	<b>67,629</b>	<b>71,453</b>	<b>138,282</b>
WIF - LCEF (Revenue)	4,500	6,350	6,350	6,350	6,350	10,400
WIF - Property	26,840	50,000	50,000	50,000	50,000	96,200
WIF - PIF Fund (Revenue)	2,040	4,000	4,000	4,000	4,000	7,920
<b>Sub Total - WIF</b>	<b>33,380</b>	<b>60,350</b>	<b>60,350</b>	<b>60,350</b>	<b>60,350</b>	<b>114,520</b>
<b>Total</b>	<b>51,158</b>	<b>93,058</b>	<b>117,331</b>	<b>127,979</b>	<b>131,803</b>	<b>252,802</b>

### 7.3 Maximum Investment Limits

	2025/26 £000	2026/27 £000	2027/28 £000	2028/29 £000	2028/29 £000	2029/30 £000
WPDG Capital Loans	25,000	25,000	25,000	25,000	25,000	25,000
WPDG Revenue Loans	4,000	4,000				
WIF PIF Capital Loans	40,000	40,000				
WIF PIF Revenue Loans	3,000	3,000				
WIF LCE Revenue Loans	3,000	3,000				
Other Revenue Loans	7,000	7,000	7,000	7,000	7,000	7,000
<b>Total</b>	<b>82,000</b>	<b>82,000</b>	<b>32,000</b>	<b>32,000</b>	<b>32,000</b>	<b>32,000</b>

Annual investment limits are for in year spend only. These will be amended per year as necessary based on actuals, the limit for PIF has increased from £20m to £40m to allow flexibility on how much is invested in the final two years of the fund. However, the maximum that can be invested by the PIF in aggregate remains £50m.

#### 7.4 Maximum Duration Limits

WPDG - Equity	Investment durations will be specified by each business case, subject to the investment limits set out in this strategy. The net investment limits above align with investment duration limits over the period of the MTFS.
WPDG - Development Loans	
WPDG - Revenue Loans	Revenue loans are short term by nature. The balance each year represents the lending facility available.
WIF - LCE	5 years
WIF - Property	5 years

There are two years remaining in the current WIF. The WIF investment strategy and business case for 2025/26 outlines a comprehensive approach to assess the WIF's impact and explore future options for 2027/28 and beyond.

#### 7.5 Equity Limits

WPDG	As specified by each business case, and subject to the specific limits set out in this strategy. If an equity investment is in the form of pre-existing owned property, then the investment may go ahead if a higher value is due to revaluation only.
WIF	No more than 10% of the gross investment budget for each year may be equity in nature

#### 7.6 Maximum Investment per Counterparty

WPDG	As per the gross investment values in Table 7.1
WIF - LCE	£0.5m
WIF - Property	£10m