



11th September, 2019.

**TO: AN CATHAOIRLEACH
& EACH MEMBER OF KILKENNY COUNTY COUNCIL**

RE: LOCAL PROPERTY TAX (LPT) – BUDGET 2020

Dear Councillor,

The Elected Members will be required to adopt the 2020 Statutory Budget in late November. In advance of preparing this budget the Members are required to make a decision before the end of September on the issue of varying the basic rate of LPT up or down by a maximum of +/- 15%, as per Section 20 of the Finance (Local Property Tax) Act 2012 as amended by section 5 of the Finance (Local Property Tax) Act 2013. The statutory deadline for making this decision is September 30th 2019.

Challenges:

Each year the Council faces challenges in balancing the expenditure demands with the income available. The challenge in 2020 is even more acute given the continued upward pressure on the cost base, with much of the additional expenditure in the main mandatory not discretionary.

Community Development and Support

Whilst the budget to be adopted by the end of November is for the operation of Kilkenny County Council it does have a significant impact across the wider community. The budget funds the full range of Council services including Housing, Environment, Roads, Library's, Arts etc. It also has an impact on a much wider community as our budget provides for contribution to a number of external organisations including:

- Watergate Theatre,
- Rothe House,
- Castlecomer Discovery Park,
- Castlecomer Enterprise Centre,
- Drum Youth Centre,
- Kilkenny Tourism,
- Kilkenny Archives,
- Butler Gallery,
- Kilkenny Festivals, the length and breadth of the county including the Arts Festival, Savour Kilkenny, Town of Books in Graiguenamanagh, Kilkenny Animates,
- Keep Kilkenny Beautiful,

- Kilkenny Energy Agency,
- Kilkenny Recreation and Sports Partnership,
- Garda Youth Programme,
- Ossory Youth,
- Rural Transport,
- Dail na Nog,
- Public Partnership Network,
- Local Enterprise Start-up Programme,

The contribution made to the organisations listed above is in the main discretionary spend for the Council, i.e. we have no legal obligation. But there is no doubt that any reduction in funding would have a very significant impact on the individual organisations, on their capacity to deliver services to local communities and their ability to attract funding from other sources to deliver much needed services to local communities across the City and County.

Attracting National Funding for Local Development

As Councillors you are well aware of the many funding streams that are now in place at national and local level, many of which are focussed on rural communities. The funding streams are extremely important sources of funding to deliver community projects on the ground. These include:

▪ Town & Village Scheme	▪ Anti-Litter & Anti-Graffiti
▪ CLAR	▪ Tidy Towns
▪ LIS	▪ Graveyard Grants
▪ CIR	▪ Estate Management
▪ Outdoor Rural Recreation Grants [ORIS]	▪ Paint Scheme
▪ Rural Regeneration Development Fund	▪ Festival & Events Grants
▪ Heritage Grants	▪ Housing Grant Schemes

Most, if not all, require match local funding. These funds are an extremely important source of funding, channelled through the Council, to towns and villages, communities and householders across Kilkenny. In addition to match funding, resources are also required to manage:

- consultation with communities on the priorities,
- the preparation of grant applications,
- preparation of plans,
- progressing of planning and other consents
- the tender process and the actual delivery of the projects
- drawdown of grants.

We have resourced the organisation over the last number of years to deliver at community level, and we are having a very positive impact working in partnership with local communities to meet local needs. Without the capacity to match grant aid funding many good community projects may not proceed.

Opportunities for Kilkenny City & County

Kilkenny County Council has an ambitious capital programme to maintain Kilkenny's position as a good place to live, work and visit.

Delivering the Abbey Quarter

Work has commenced on the Abbey Quarter with Phase 1 due for completion by the end of 2020. Phase 1 includes the upgrade of the Brewhouse as modern offices, the conversion of the Mayfair as the City Library and the adjacent public realm, along with the Riverside Park and Skateboard Park and the upgrade of the two Tea Houses. By the end of 2020 we will have progressed Phase 2, the Urban Street and Park around St. Francis Abbey through planning. In tandem, the Abbey Quarter Partnership will progress planning for a hotel and new buildings on the site. The Council is responsible for delivery and financing of the public realm in the Abbey Quarter. The Council has secured grant aid in excess of €6m towards Phase 1 with match funding to be provided by the Council.

Breaghagh Valley

Works on the infrastructure to open up the Breaghagh Valley are underway and will facilitate the delivery of the new neighbourhood. Grant Aid of €6.5m is in place for this project which must be matched by Kilkenny County Council. The ETB has recently appointed a Design Team to progress two schools through planning and delivery. The Breaghagh Valley will accommodate over 3,000 residential units over the next ten years.

Kilkenny Greenway

Having secured grant aid of €8m this project is now at detailed design and subject to matching funding being in place the project should commence in 2020.

It is imperative that the Council is in a position to provide matching funding for these and other crucial capital projects. The 2020 budget needs to provide for the repayment of new loans which will make up a significant portion of the match funding.

Limited Sources of Income

Since the Local Property Tax was introduced in 2014 there has been no increase in same. Other than a small increase to the former County rate payers, as part of the harmonisation process, the Council has not increased the Rate in the Pound/Multiplier in 12 years. LPT and rates account for just under 40 percent of our income on an annual basis. Realistically the only potential to raise extra income of significance for 2020 is a decision by the Members to vary the base rate of Local Property Tax or the Annual Rate on Valuation on Commercial Rates.

Local Property Tax

The Local Property Tax allocation for 2020 has been confirmed at €10.67m (*See Appendix 4 attached*). The Local Property Tax funding model replaced the previous General Purpose Grant and has not resulted in any additional income for the Council since its introduction. The Local Property Tax allocation is capped at the General Purpose Grant allocation for 2014 and has not changed since then.

Commercial Rates

The revaluation of commercial rates on all properties in the County was completed by the Valuation Office in 2017 and came into effect for the 2018 financial year. This process did not result in any additional income for the Council, it is designed to be income neutral. The valuation on 196 properties has been appealed to the Valuation Tribunal. A total of 101 of

these appeals representing 35% of the rate demand appealed have been dealt with resulting in a reduction in the annual rates income of €374k. There exists a significant risk of further losses of income for the Council in 2020 from this appeal process. The Council has no role in the valuation of properties for rates, the Council Members role is in the adoption of the multiplier as part of the annual budget process.

Decision on LPT:

In taking a decision to pass a resolution to vary the basic rate, the members must have regard to the following matters:

1. Feedback from the public consultation process.
2. Estimation of income and expenditure for the period for which the varied rate is to have effect.
3. The financial position of the Local Authority.
4. The financial effect of the varied rate.

1. Public Consultation

The prescribed thirty-day public consultation process commenced on July 3rd. The notice was published in the Kilkenny People newspaper on July 3rd and was also published on the Council website and on social media. One submission was received by the end of the consultation period requesting no change to the base rate.

2. Estimate of Income & Expenditure

A schedule setting out the estimated Income and Expenditure for 2019 and 2020 is set out in Appendix 1. The forecast expenditure for 2019 is now €79.9m compared with the adopted budget estimate of €79.7m.

The preliminary estimate of income and expenditure for 2020 shows a projected spend of €82m. The final projections for 2020 will be known once the detailed budget is completed in the coming weeks.

3. The Financial Position of the Local Authority

The Financial position of Kilkenny County Council as at 30th June 2019 is set out in the attached Appendix 2. The total value of current assets was €20.2m and current liabilities amounted to €23.1m giving a ratio of .9. The Capital reserves available to the Council has reduced by over €25m since the end of 2011. The total value of loans receivable on mortgage debt was €42.2m compared with a balance payable of €42.5m. The total amount of non mortgage loans outstanding at June 2019 was €12m.

4. The Financial Effect of the Varied Rate

Information on the LPT for Kilkenny is included in Appendix 3 and 4. The total number of properties declared to date for Kilkenny is 36,800 with a 97.1% compliance rate for payment. 90% of properties in the county are valued at €200,000 or less. The projected Local Property Tax Income for Kilkenny is €7.5m (assuming no change to the basic rate). 80% of this will be retained locally amounting to €6.0m. The total distribution to Kilkenny from the equalisation fund is €4.669m which includes €1.32m of compensation for the loss of pension levy income. The impact of the maximum variation of +/- 15% in the Council's finances is +/- €1.1m (Every 1% equates to +/-€75k). Appendix 3 also outlines the impact of a variation of 15% in the base rate of LPT on properties on the first three valuation bands.

The impact of a variation of 15% in the first three valuation bands is as follows:

		Annual Impact €	Weekly Impact Cents
Valuation Band 1	€ 0k to €100k	14	26
Valuation Band 2	€100k to €150k	34	65
Valuation Band 3	€150k to 200k	47	91


In the event of the members passing a resolution to reduce the LPT basic rate by 15% no additional funding will be provided from the Equalisation Fund and expenditure will have to be reduced accordingly to balance the budget. If the members decide to increase the LPT basic rate, 100% of the resultant additional income collected will be retained by Kilkenny County Council. 15% of an increase in LPT will generate €1.12 million. A 5% increase in commercial rates would generate a similar amount.

Recommendation:

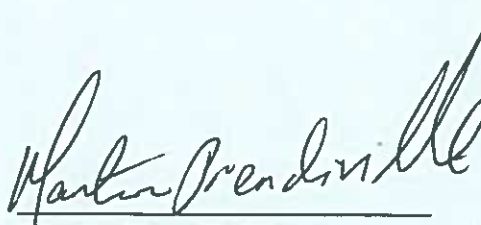
Whilst it is not ideal, the decision on the LPT is required to be made by the Elected Members before the budget is finalised. This report sets out, as best we can at this time, the challenges that will be faced by the Council in the preparation of the budget for 2020. Our revenue budget funds the day to day provision of services, grant aid and assistance to many projects and groups the length and breadth of the County, repayments for borrowings to provide match funding to many essential capital projects. In the absence of an increase in income it is inevitable that cuts will be made and that same will impact our discretionary spend which will in turn have an impact on the level of services provided by the Council and many projects throughout the City & County.

An increase of 15% in the LPT is recommended.

Signed:


Colette Byrne
Chief Executive
Kilkenny County Council

Signed:


Martin Prendiville
Head of Finance
Kilkenny County Council

- Appendix 1:** Kilkeny County Council -Estimate of Income and Expenditure 2019 and 2020.
- Appendix 2:** Kilkeny County Council - Financial Position - June 2019
- Appendix 3:** Impact of variation in the basic rate of LPT on property owners in Kilkeny.
- Appendix 4:** Circular Fin 05/2019 dated 31st July 2019 from DHPCLG setting Out the provisional Local Property Tax Allocation for 2020 for Kilkeny County Council.
- Appendix 5:** Submission from Ballyraggett Development Association.

Estimated Income and Expenditure (2019 & 2020)*Appendix 1*

	<u>2019 Estimated</u>	
	<u>Outturn</u>	<u>2020 Budget</u>
INCOME	<u>€m</u>	<u>€m</u>
Commercial Rates	19.6	19.8
Local Property Tax	5.9	6.0
Grants and Subsidies	33.7	34.3
Other Income	20.7	21.9
Total Income	79.9	82.0
EXPENDITURE	€m	€m
Payroll Expenses	35.9	36.4
Loan interest and principal repaid	4.9	5.6
Social benefits (transfer to households)	8.5	8.5
Capital Grants paid.	2.2	2.2
Other Expenditure	28.4	29.3
Total Expenditure	79.9	82.0

Kilkenny County Council
Financial Position as at June 2019

APPENDIX 2

<u>Assets</u>	€m
Current Assets (including cash and investments)	20.2
General revenue reserve (if surplus)	0.0
Loans Receivable	52.0
<u>Liabilities</u>	
Current Liabilities (including overdraft)	23.1
General Reserve (if Deficit)	0.0
Loans Payable	
Voluntary housing / mortgage loans	42.2
Non mortgage loans	12.0
<u>Indicators</u>	
Ratio of loans to payable to revenue income	0.7
Ratio of current assets to current liabilities	0.9

**Kilkenny County Council
Local Property Tax**

Analysis of properties in each LPT Valuation Band.

	A	B	C	D
	No of Properties	% Properties	Cumulative %	Annual LPT - Base €
LPT Valuation Band				
0-100,000	11,334	31%	31%	90
100,001-150,000	13,285	36%	67%	225
150,000-200,000	8,574	23%	90%	315
>200,000	3,606	10%	100%	
Total	36,800	100%		

Source: Revenue Commissioners and DHPCLG

Appendix 3

E	G
Annual Impact of change +/- 15%	Weekly Impact of change +/- 15%
€	Cents
14	26
34	65
47	91

An Roinn Tithíochta,
Pleanála agus Rialtais Áitiúil
Department of Housing,
Planning and Local Government



31 July 2019

Circular Fin 05/2019

Chief Executive

cc. Head of Finance

Provisional Local Property Tax Allocations 2020 – Kilkenny County Council

A Chara,

I am directed by the Minister for Housing, Planning, and Local Government to inform you that the provisional Local Property Tax (LPT) allocations from the Local Government Fund for 2020 have been agreed and Kilkenny County Council's allocation is set out below and in **Appendix A** to this document. LPT allocations have been calculated using the Revenue Commissioners' data on net declared liabilities of €463m post-variation in 2019 (as set out in **Appendix B** to this document). On a pre-variation basis, the full 2019 net declared liability amounts to €488m and this is the estimate applied to the provisional LPT allocations process for 2020.

2020 Baseline

Every local authority is entitled to receive a minimum amount of funding under the LPT allocation process, known as the Baseline. Kilkenny County Council's Baseline for 2020 is **€10,673,913**.

Equalisation

The local retention mechanism will continue in 2020. 80% of all LPT receipts will be retained within the local authority area where the Tax is raised. The remaining 20% of the Tax collected nationally will be re-distributed on an equalised basis to local authorities, within the context of the annual allocations of LPT, to ensure that all authorities receive, at a minimum, an amount equivalent to their Baseline. This 20% for equalisation will be based on the total expected level of LPT in each local authority area and will not be adjusted if the basic rate of LPT is varied. Based on its shortfall position when expected 2020 LPT receipts are compared to the 2020 Baseline, Kilkenny County Council will be in receipt of equalisation funding in 2020.

Self-Funding

Some local authorities will receive greater levels of funding in 2020 from the Local Government Fund as a result of local retention of LPT compared to their Baseline. Local authorities will have the surplus allocated in two ways:

- Part of the surplus up to the equivalent of 20% of total expected LPT income (or the full amount of the surplus if that is less than 20%) can be used as additional income by local authorities for the authority's own use as part of their normal budgetary process; and
- The remainder of the surplus, if any, will then be available to the local authority to fund services in the housing and/or roads areas thereby replacing Central Government funding for some of these services. Authorities are expected to continue providing such services regardless of the changed approach to funding.

The specific detail of the level of Central Government Voted grants funding to be provided to local authorities is a matter that will be considered, as normal, as part of the Estimates process.

Based on its shortfall position when expected 2020 LPT receipts are compared to the 2020 Baseline, Kilkenny County Council will not be required to self-fund services in the Housing and/or Roads areas.

Provisional LPT allocation to Kilkenny County Council in 2020

The LPT allocation for Kilkenny County Council for 2020 (pending any decision to locally vary the basic rate) is €10,673,913. As a local authority where 80% of the expected 2020 LPT yield is less than the Baseline, this allocation includes €4,669,063 equalisation funding in order to ensure the allocation is at least matched to the Baseline.

Please refer to the table in Appendix A, which sets out the basis for the allocation.

Variation

Every local authority has the power to vary the basic rate of LPT by up to 15%. It should be noted that if Kilkenny County Council decides to vary the LPT basic rate upwards in 2020; 100% of the resultant additional income will be available for the authorities' own use. Similarly, if Kilkenny County Council decides to vary the LPT basic rate downwards (by up to 15%) in 2020, the resultant loss in LPT income will be reflected in reduced LPT funding to the authority.

Local authorities are further reminded of their statutory obligations as set out in the Local Property Tax (Local Adjustment Factor) Regulations 2014 (S.I. Nos. 296 & 439/2014) which take account of relevant provisions in the Finance (Local Property Tax) Acts. Previous guidance circular Fin 08/2014 also refers.

2019 LPT Statistics and Property Valuation Bands

2019 LPT Preliminary Statistics and Property Valuation Bands were provided to this Department by the Revenue Commissioners. This information is being provided for statistical purposes only to assist in the consideration of the local adjustment factor for 2020 LPT.

LPT statistics set out in Appendix B to this document outline the following:

- 2019 LPT Exempt (additional to declared liabilities)
- 2019 LPT Amounts Declared
- 2019 LPT Amounts Deferred
- 2019 Net LPT Position

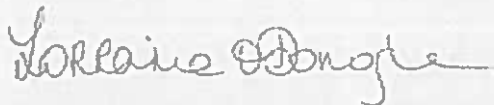
The projected amounts for 2019 LPT reflect any local decision to lower/increase the basic rate by the local adjustment factor in 2019, i.e. data provided is post-variation.

This is of course subject to normal fluctuations that may be caused by transfers in property ownership and the on-going compliance campaign in operation by the Revenue Commissioners.

In accordance with section 152 of the Finance (Local Property Tax) Act 2012, the Department also requested information in relation to property valuation bands for each local authority area from the Revenue Commissioners as set out in **Appendix C** to this document.

Local Authorities will be advised of any further information once it becomes available.

Is mise, le meas,



Lorraine O'Donoghue

Principal

Local Government Finance

Appendix A

Kilkenny County Council - 2020 LPT Allocation (Pending any decision to vary the basic rate)

	€
LPT 100%	<u>7,506,062</u>
LPT 20% towards Equalisation funding	<u>1,501,212</u>
2020 Baseline	10,673,913
LPT Retained Locally (80%)	<u>6,004,850</u>
2020 Shortfall (LPT Retained Locally – 2020 Baseline)	<u>-4,669,063</u>
Distribution of Equalisation funding	4,669,063
Total LPT funding to be provided in 2020	<u>10,673,913</u>
Value of potential increase or decrease in 2020 LPT Allocation <u>for every 1%</u> of variation implemented	+/- 75,061

Appendix B – 2019 LPT Preliminary Statistics, post application of the 2019 Local Adjustment Factor provided by the Revenue Commissioners

Local Authority	LPT 2019 Exempt	LPT 2019 Declared	LPT 2019 Deferred	Net LPT 2019 Post Variation
Carlow County Council	€127,385	€4,098,159	€106,898	€3,991,261
Cavan County Council	€152,350	€4,592,543	€128,138	€4,464,405
Clare County Council	€217,170	€10,319,177	€211,095	€10,108,082
Cork City Council	€665,230	€21,715,791	€381,218	€21,334,573
Cork County Council	€851,632	€31,377,421	€525,263	€30,852,158
Donegal County Council	€270,755	€11,361,860	€324,338	€11,037,522
Dublin City Council	€2,465,139	€69,500,175	€1,246,456	€68,253,719
Dún Laoghaire-Rathdown CC	€1,415,284	€44,788,401	€612,978	€44,175,423
Fingal County Council	€1,033,563	€35,126,361	€663,563	€34,462,798
Galway City Council	€161,545	€8,318,102	€103,455	€8,214,647
Galway County Council	€384,218	€14,974,022	€290,610	€14,683,412
Kerry County Council	€377,365	€14,370,391	€242,843	€14,127,548
Kildare County Council	€560,415	€22,174,292	€444,157	€21,730,135
Kilkenny County Council	€268,821	€7,663,225	€157,163	€7,506,062
Laois County Council	€163,494	€5,596,425	€148,604	€5,447,821
Leitrim County Council	€85,455	€2,186,995	€47,565	€2,139,430
Limerick City and County Council	€525,089	€17,283,897	€372,061	€16,911,836
Longford County Council	€101,295	€2,511,948	€73,465	€2,438,483
Louth County Council	€251,990	€9,898,080	€300,893	€9,597,187
Mayo County Council	€230,580	€10,661,655	€217,755	€10,443,900
Meath County Council	€449,560	€18,036,056	€445,208	€17,590,848
Monaghan County Council	€94,827	€3,932,640	€101,700	€3,830,940
Offaly County Council	€363,960	€5,095,462	€146,273	€4,949,189
Roscommon County Council	€113,580	€4,100,895	€91,710	€4,009,185
Sligo County Council	€137,475	€5,368,070	€96,795	€5,271,275
South Dublin County Council	€208,660	€27,576,156	€641,306	€26,934,850
Tipperary County Council	€614,187	€12,126,131	€272,565	€11,853,566
Waterford City and County Council	€285,047	€9,804,188	€226,873	€9,577,315
Westmeath County Council	€164,868	€6,594,815	€157,320	€6,437,495
Wexford County Council	€363,654	€13,866,446	€384,122	€13,482,324
Wicklow County Council	€462,525	€17,622,795	€379,220	€17,243,575
Totals	€13,567,118	€472,642,565	€9,541,601	€463,100,964

Note 1: This analysis is preliminary; there is a small element of estimation in regard to the distribution of amounts by Local Authority.

Note 2: The LPT Declared amount includes declared amounts from returns filed to date, deferred amounts and amounts due on foot of instructions sent to employers and pension providers to collect LPT by way of mandatory deduction at source.

Note 3: The figures include LPT amounts for properties owned by Local Authorities and Approved Housing Bodies.

Note 4: The exemption amounts set out above are based on claims made and will be subject to certain verification checks. In addition, the full effects of exemptions are not reflected in the statistics as where an exemption was claimed the property owner was not always required to value their property.

Appendix C – LPT Valuation Bands provided by the Revenue Commissioners

LPT 2019 Valuation Bands	0-100,000	100,001-150,000	150,001-200,000	200,001-250,000	250,001-300,000	Over 300,000
Carlow County Council	39.1%	37.9%	17.8%	3.2%	1.0%	1.0%
Cavan County Council	53.1%	37.9%	6.8%	1.4%	0.4%	0.4%
Clare County Council	33.8%	35.5%	17.8%	4.9%	1.7%	1.3%
Cork City Council	20.9%	30.0%	25.7%	13.2%	4.8%	5.4%
Cork County Council	28.3%	27.3%	27.5%	10.2%	3.3%	3.3%
Donegal County Council	50.5%	39.9%	6.7%	1.8%	0.6%	0.5%
Dublin City Council	12.6%	20.1%	20.7%	16.2%	8.9%	21.5%
Dún Laoghaire-Rathdown CC	5.0%	3.0%	10.3%	13.6%	12.0%	56.0%
Fingal County Council	11.7%	18.0%	25.0%	16.3%	10.3%	18.7%
Galway City Council	20.0%	32.3%	26.9%	11.0%	4.2%	5.7%
Galway County Council	36.5%	32.0%	22.4%	5.1%	1.9%	2.0%
Kerry County Council	31.7%	32.9%	26.9%	5.2%	1.8%	1.5%
Kildare County Council	19.1%	23.5%	28.9%	16.7%	5.9%	5.9%
Kilkenny County Council	31.0%	36.1%	23.3%	5.6%	1.7%	2.2%
Laois County Council	42.9%	42.4%	10.4%	2.5%	0.9%	0.9%
Leitrim County Council	60.3%	34.6%	3.8%	0.9%	0.2%	0.2%
Limerick City & County Council	36.0%	32.2%	21.3%	6.1%	2.4%	2.0%
Longford County Council	61.9%	32.6%	4.2%	0.8%	0.3%	0.2%
Louth County Council	36.2%	32.4%	21.5%	6.1%	2.0%	1.8%
Mayo County Council	43.8%	38.6%	13.4%	2.4%	0.9%	0.9%
Meath County Council	20.9%	28.7%	27.9%	12.8%	5.1%	4.7%
Monaghan County Council	42.7%	42.4%	11.6%	2.1%	0.7%	0.5%
Offaly County Council	40.7%	37.8%	17.1%	2.6%	0.9%	1.0%
Roscommon County Council	56.8%	35.3%	5.7%	1.3%	0.4%	0.5%
Sligo County Council	44.2%	33.1%	16.0%	4.0%	1.3%	1.4%
South Dublin County Council	15.1%	17.5%	25.6%	17.0%	8.8%	15.9%
Tipperary County Council	38.8%	36.0%	18.7%	4.1%	1.4%	1.1%
Waterford City & County Council	40.1%	30.8%	20.0%	5.0%	2.1%	2.0%
Westmeath County Council	40.7%	36.6%	16.7%	3.5%	1.3%	1.1%
Wexford County Council	34.6%	37.0%	21.9%	3.8%	1.4%	1.3%
Wicklow County Council	14.0%	19.0%	26.8%	18.9%	8.5%	12.8%

Ballyragget Development Association

Re: Notice of Consideration of setting a Local Adjustment Factor

We, Ballyragget Development Association respectfully request that the elected Members of Kilkenny Co. Co. do not vary the basic rate of the Local Property Tax at its September meeting

Households and Businesses are the heart and soul of our villages, towns and beautiful city, all striving to meet the challenges encountered on a daily basis.

Our Public Representatives, in their work, are very much aware of the daily demands on households / businesses, eg property tax, rates, water charges, bin charges, medical fees, childcare costs, school fees and transport costs, to name but a few. Many households and businesses struggle to survive as it is, any increase in the LPT will not help their cause

As a local voluntary group striving for the maintenance and upkeep of our village we acknowledge the support of Kilkenny Co. Co. in our efforts and we extend best wishes to the recently elected Council members

We trust you will give our request not to vary the basic rate of the LPT your consideration

Kind regards,

Brigid Murphy, Secretary

16/08/'19



