

DRAFT CONSULTATION RESPONSE TO HUNTINGDONSHIRE DISTRICT COUNCIL'S PROPOSED APPROACH TO SEEKING DEVELOPER CONTRIBUTIONS

To: Cabinet

Date: 6th September 2011

From: Executive Director: Environment Services

Electoral division(s): All – with particular relevance to:

- The Hemingfords and Fenstanton
- Huntingdon
- Little Paxton and St Neots North
- Somersham and Earith
- Brampton and Kimbolton
- Godmanchester and Huntingdon East
- St Neots Eaton Socon and Eynesbury
- Warboys and Upwood
- Norman Cross
- Sawtry and Ellington
- St Ives
- Ramsey
- Buckden, Gransden and The Offords

Forward Plan ref: 2011 / 058 *Key decision:* Yes

Purpose: To inform Cabinet of the proposed changes to seeking developer contributions in Huntingdonshire through the introduction of a Developer Contributions Supplementary Planning Document and a Community Infrastructure Levy Preliminary Draft Charging Schedule.

Recommendation: Cabinet is invited to:

- i) Consider and endorse the draft consultation response as set out in Appendix A and Appendix B.
- ii) Delegate to the Lead Member for Growth and Planning in consultation with the Executive Director for Environment Services and taking account of any views of Local Members received, the authority to make any minor changes to the draft consultation response prior to its submission.

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1. BACKGROUND

- 1.1 On the 29th July 2011, Huntingdonshire District Council published two documents for public consultation:

i) Huntingdonshire Community Infrastructure Levy (CIL) – Preliminary Draft Charging Schedule.

ii) Huntingdonshire Local Development Framework: Draft Developer contributions Supplementary Planning Document; and

Copies of these documents are available to view at:-

<http://consult.huntsdc.gov.uk/portal>

- 1.2 The consultation on these documents expires on 9th September 2011. Both County Council Members in Huntingdonshire and County Officers have been given the opportunity to comment on the documents. The full draft consultation responses built on these comments are set out in Appendix A and Appendix B of this report.

Community Infrastructure Levy (CIL)- Preliminary Draft Charging Schedule

- 1.3 The CIL is a new planning charge on development that came into force in April 2010. It largely came about as a result of Government dissatisfaction with the current system and the lack of Section 106 money being secured by local authorities around the country. The Government expects the new CIL process to bring a number of benefits, including:
- Greater clarity for developers and local authorities
 - Predictability and consistency of funding streams
 - Accountability
 - Greater flexibility in terms of expenditure
 - More money, especially from small scale development, and a fairer system as all new developments will contribute, not just large ones.
- 1.4 In total, the Government estimates that CIL has the potential to raise an additional £700m a year for local authorities by 2016.
- 1.5 In summary, in order for local authorities to introduce CIL (District Councils in Cambridgeshire), they must first identify their projected growth levels (i.e. number of new houses and other types of development over a set duration). In order to support this projected growth, the local authorities must then work with other service providers to identify the amount of new infrastructure that is required to support the growth. The required infrastructure is listed within an Infrastructure Project List (IPL). In very simple terms, the CIL charging rate is calculated by dividing the total costs of the IPL by the projected growth. However, in reality, a viability assessment needs to be conducted to assess exactly what the market can and cannot afford.

- 1.6 The CIL is an amount payable per square metre of development floor space. Funds raised through the CIL will be used to help pay for a wide range of community infrastructure required to support growth in the District.
- 1.7 Huntingdonshire District Council is one of the country's frontrunners in terms of working towards and introducing CIL. The District has produced a CIL Preliminary Draft Charging Schedule which sets out the proposed rates of CIL. In preparing the Draft Charging Schedule, the necessary infrastructure, phasing and costs have been considered and listed within an IPL. A link to this List is found on page 18 of the Draft Charging Schedule.
- 1.8 The Draft Charging Schedule also contains a viability assessment (page 20 of the consultation document) which has been fundamental in forming the proposed CIL rates.
- 1.9 County Officers have participated in the drawing up of the Infrastructure Project List (IPL) through an internal CIL Project Team and the work undertaken by this group has been fed through to Huntingdonshire District Council to allow them to form the charging schedule. County Council Officers have worked closely with Huntingdonshire District Council in the formation of their CIL proposals and particularly in terms of inputting key infrastructure requirements. The IPL sets out the infrastructure needed to underpin new development in the District until 2026.

Draft Developer Contributions Supplementary Planning Document (SPD)

- 1.10 This draft document sets out the policies that are proposed for securing development contributions from new developments within Huntingdonshire. It will be mainly used prior to the adoption by Huntingdonshire District Council of the Community Infrastructure Levy (CIL), expected in Spring 2012.
- 1.11 Following the adoption of a CIL Charging Schedule, the CIL Regulations will severely restrict the ability of Huntingdonshire District Council to collect and pool S106 contributions and the principle is that all eligible development will pay towards CIL. At that point, the developer contributions SPD will still exist, but it is proposed that it will be primarily used to help secure S106 contributions for site specific infrastructure required from larger residential developments (of 200 units or more). The larger residential developments will be expected to pay S106 contributions towards site specific infrastructure in addition to CIL, however, the Local Planning Authority will not be able to charge individual developments for the same items of infrastructure through both S106 and CIL.

2. MAIN ISSUES

Community Infrastructure Levy - Preliminary Draft Charging Schedule

- 2.1 Huntingdonshire District Council is proposing to levy CIL on most forms of development. Table 1 identifies the proposed charges. Critically from the County Council's perspective, no CIL payments are proposed for schools, libraries and community centres.

Table 1: Proposed CIL Rates

Proposed Charge	Per Square Metre
All development types unless stated otherwise in this table	£100
Hotel (C1)	£60
Nursing Home (C2)	£45
Health (D1)	£140
Retail < 1000sqm (A1, A2, A3, A4 & A5)	£50
Retail = 1000sqm or above (A1, A2, A3, A4 & A5)	£140
Business (B1), General Industrial, Storage & Distribution (B2 and B8) and Community Uses (within D1 and D2)	£0

- 2.2 £100 per square metre is proposed for all residential units. Therefore an averaged sized 3-bedroom property would be expected to pay in the region of £9,000 in CIL money. The viability information presented by the District Council suggests that this figure is viable and County Officers consider the figure to be reasonable in this present economic climate.
- 2.3 If the above rates are applied, it is expected that approximately £40m in CIL income would be generated up to 2026. The District Council is entitled to apply a charge of up to 5% for administration on all CIL monies collected; however, it is unclear at this stage whether the County Council will receive any of this administration charge. In order to deliver the entire list of infrastructure on the IPL, with the 5% administration charge factored in, it is estimated that a further £125m would be required. The £125m is referred to as the viability gap.
- 2.4 The Government expects local authorities to address the viability gap through other sources of funding, however, at present, the prospect of any significant other sources of funding is very uncertain.
- 2.5 As noted, County Officers consider the figure of £100 per square metre to be reasonable in this present economic climate. However, back in 2009, Huntingdonshire District Council produced a Local Investment Framework to support the adoption of their Core Strategy. This Investment Framework was the first piece of work undertaken to look at the potential for introducing a CIL across Huntingdonshire. At that time, the viability assessment suggested a maximum rate of £217 per square metre for residential development.
- 2.6 The Preliminary Charging Schedule notes that economic circumstances have changed since the Investment Framework work was undertaken, which is accepted, however, County Officers consider that whilst the £100 figure can be supported at present, economic circumstances can change again in the future and the market might be able to sustain a higher figure. It is therefore suggested that the response back to Huntingdonshire strongly suggests that the proposed CIL rates are reviewed on an annual basis.
- 2.7 In addition to the residential rates, other rates are proposed in Table 1. It is recommended that these are also supported on the condition they are reviewed annually. The only rate that County Officers have a concern with is in relation to the proposed charge for Health. It is proposed that Huntingdonshire should consider having separate rates for private and public healthcare.

- 2.8 Cabinet is also advised that for developments of 200 units or above, the District and County Council will be able to seek S106 contributions in addition to CIL. Large scale major developments of 200 units or more often necessitate the provision of their own on-site strategic infrastructure in addition to off-site improvements.
- 2.9 There are significant advantages to the County Council in the continued use of S106 in this way. Firstly, the funding will be paid directly to the County Council and will not be subject to any risk of paring down through an allocation process. Secondly, it means that the risk of insufficient funding being secured for key infrastructure will be reduced. This is because the planning policy identifies that strategic sites will be expected to provide key facilities on-site and this strong policy background should mean that an appropriate balance is struck between on-site affordable housing levels and ensuring key facilities are also provided.
- 2.10 The Huntingdonshire Community Infrastructure Levy – Preliminary Draft Charging Schedule Consultation Draft sets out a number of questions which are answered in Appendix A of this report. Cabinet is asked to consider and endorse the suggested responses.

Draft Developer Contributions Supplementary Planning Document (SPD)

- 2.11 The main issue from the Council's perspective with this document relates to the lack of detail with respect to transport and highways. This is a critical point that needs to be rectified. Officers are also requesting more information is including on biodiversity, ecology and waste management and that adult social care is considered alongside Health.
- 2.12 The proposed charges for education and libraries/life long learning are welcomed.
- 2.13 General comments on the Huntingdonshire LDF: Draft Developer contributions Supplementary Planning Document are provided in Appendix B. Cabinet is asked to consider and endorse the suggested responses.

3. ALIGNMENT WITH PRIORITIES AND WAYS OF WORKING

3.1 Supporting and protecting vulnerable people when they need it most

- 3.1.1 CIL funding will help to provide essential facilities and as such will benefit the whole community including the most vulnerable members.

3.2 Helping people live healthy and independent lives in their communities

- 3.2.1 CIL will provide a range of community facilities which will contribute towards this priority.

3.3 Developing the local economy for the benefit of all

- 3.3.1 CIL will simplify the process by which developers make contributions to necessary infrastructure and as such should encourage development and thus contribute towards economic growth.

3.4 Ways of working

- 3.4.1 Partnership working with Huntingdonshire District Council has been strong in the preparation of the IPL. It is important that this continues. When CIL money is collected in the future, it is important that the authorities work closely together in order to ensure best value and that it is allocated in the most effective way.

4. SIGNIFICANT IMPLICATIONS

4.1 Resource and Performance Implications

- 4.1.1 As noted above, the likely funding gap arising from the proposed implementation of CIL in Huntingdonshire is approximately £125m although it should be noted that introducing CIL should increase the overall contributions compared to the existing 106 system. Annual reviews of the CIL charges may help to reduce this viability gap; however, there is a risk to the County Council that alternative sources of funding may not be found. This will mean that certain infrastructure projects are delayed or never built. Careful consideration will be required when prioritising County infrastructure projects.
- 4.1.2 The District Council is the collection authority for all CIL money. It is fully expected that the District Council will transfer a proportion of CIL funds to the County Council for County led infrastructure projects. However, strictly speaking, the CIL regulations place no obligation on the District to do this. Technically, the District Council do not have to share any CIL money with the County Council. Whilst this is not expected and work to date has been very constructive on this point, it is recommended that the County's consultation response requests that Huntingdonshire District Council state the proposed percentage of CIL that they intend to transfer to the County Council. More details of the proposed split of CIL monies needs to be discussed and agreed between the County and District before the next round of consultation takes place. It is suggested that the County Council insists that the proposed CIL Charging Schedule consultation programmed for this autumn includes a clear statement as to how the CIL monies will be split. County Officers and Members will need to work closely with colleagues in Huntingdonshire prior to the next round of consultation to ensure that the County receives its fair proportion of the CIL income.

4.2 Statutory, Risk and Legal Implications

- 4.2.1. The Community Infrastructure Levy is a District wide charge on most new development under the CIL Regulations 2010 to fund a range of local and District wide infrastructure to support residential and economic growth. Even though CIL is described as an optional tool for local planning authorities, severe limitations on the use of Section 106 agreements will come into force in 2014. Therefore, for those Districts who have not managed to adopt CIL by 2014, the use of Section 106 agreements will be limited which is likely to result in a reduced income from development contributions.

4.3 Equality and Diversity Implications

- 4.3.1 There are no significant implications for equality and diversity.

4.4 Engagement and Consultation

- 4.4.1 The report above sets out the consultation process in paragraphs 1.1 and 1.2. A draft version of this report has been sent to all County Members within Huntingdonshire. Cllr Bates (Growth and Planning Portfolio Holder) requested that further discussion is needed to establish and agree how the CIL monies will be split between the County, District and other service providers. He also stressed the importance of the SPD containing information on transport/highway and waste management contributions, plus noted that contributions for Adult Social Care should be considered alongside Health. These comments have been incorporated within the proposed response.

Source Documents	Location
Huntingdonshire LDF: Draft Developer contributions Supplementary Planning Document	New Communities 2 nd Floor, A Wing Castle Court
Huntingdonshire Community Infrastructure Levy – Preliminary Draft Charging Schedule	http://consult.huntsdc.gov.uk/portal

APPENDIX A – Preliminary Charging Schedule

The following sections contain draft comments on the specific questions asked by Huntingdonshire District Council in the CIL consultation.

The CIL Rate

Do you agree with the proposed standard charge for most development?

It is proposed that a standard charge of £100 be set and this will apply to all residential development.

The Huntingdonshire Local Investment Framework suggested that a residential development within the District could afford £217 per square metre back in 2009.

The latest information, provided by Huntingdonshire District Council, suggests that just £98 per square metre is viable. This is a significant reduction which has been attributed to the changing economic climate. The County Council supports the rate for the standard charge on the condition that it is reviewed on an annual basis. If £217 was achievable in the past, then it could be achievable again in the near future. Reviewing the rates on an annual basis may also help to address the viability gap.

Do you agree with the proposed standard charge for retail development?

It is acknowledged that the range of County infrastructure required from this type of development is lower than for residential development and therefore the rate is lower whilst supporting that larger retail development (over 1000 sq m) pay a higher rate due to the scale of development. The County Council supports these rates on the condition that they are reviewed on an annual basis.

Do you agree with the proposed standard charge for hotel development?

It is acknowledged that the range of County infrastructure required from this type of development is lower than for residential development and therefore the rate is lower. The County Council supports this rate on the condition that it is reviewed on an annual basis.

Do you agree with the proposed standard charge for nursing home development?

It is acknowledged that the range of County infrastructure required from this type of development is lower than for residential development and therefore the rate is lower. The County Council supports this rate on the condition that it is reviewed on an annual basis.

Do you agree with the proposed standard charge for health development?

It is suggested that a standard charge for health should be reconsidered. It would be expected that private healthcare could afford the £140 per square metre rate, but to have the same rate for public healthcare may appear unreasonable.

Do you agree with the proposed zero charge for business, general industrial, storage and distribution and community uses development?

Business and general industrial units will often have a significant impact on the transport and highway network; however, in the interests of supporting economic growth in the District, the County Council supports this rate at present. As per the other rates, it should be reviewed on an annual basis.

CIL Geographical Zone

Do you agree with the proposal to set a flat rate levy according to uses across the whole of Huntingdonshire?

Costs to County Council provided services and infrastructure would generally be uniform across the District. For example the cost of providing a new school in Huntingdon would be the same as providing a new school in Upton.

A uniform rate is therefore supported.

Infrastructure Need

Do you agree with the Infrastructure Definition?

The infrastructure definition is reasonable as it is not an exhaustive list. Further projects should be included for transport, rights of way network and waste management (please see below).

Do you agree with S106 development specific infrastructure?

The County Council has in the past secured contributions in this way and so supports the principle.

Assessment of Viability

Do you agree the appropriate balance between the desirability of funding from CIL and impacts on the economic viability have been met?

Whilst the rationale for encouraging growth is understood and supported it should be recognised that the CIL rate proposed will leave a funding gap that will need to be filled by other funding. However, in many cases, this alternative funding may not have been identified or be available, leaving the County Council exposed to a financial risk in fulfilling its statutory funding.

As the economy improves, it is quite possible that residential development could afford a higher (up to £217 per square metre) rate again. Therefore, it is important that the CIL rate is reviewed annually to ensure the level of risk to the public purse is managed.

The County Council agrees that the appropriate balance has been achieved at present, but this balance may not be appropriate in the future. We therefore stress the importance of continued annual reviews.

Other County Officer Comments of the Preliminary Draft Charging Schedule

General

The County Council requests that Huntingdonshire identify a proposed CIL percentage split for discussion which needs to be agreed before the next round of consultation begins in the autumn.

Suggested Response

Further work is needed between Officers to address the point of how CIL monies will be split between the County, District and other service providers. A clear statement as to how the CIL monies will be split needs to be agreed prior to the CIL Charging Schedule consultation programmed for this autumn.

Transport

The IPL has some key transport projects missing which are significant in terms of aiding the delivery of and mitigating against the potential impact of growth. Proposed transport schemes that should be included are:

Huntingdon

The schemes for the improvements to the A141 and its junctions need to be fully included. The A141 currently experiences congestion and delays, particularly at peak times. This road and its junctions will need improvements to facilitate growth in Huntingdon. Without improvements, it is likely that any increase in vehicle trips will add further congestion and delays on the link.

All areas

The costs for improvements to the rights of way network should be added to the IPL.

Suggested Response

The A141 and junction improvement schemes need to be added to the IPL along with the cost for improvements to the rights of way network.

Waste Management

The St Neots Household Waste Recycling Centre is captured within the IPL. The County Council is also in the process of preparing a RECAP Waste Management Design Guide which is due to go out for a second round of public consultation in September prior to adoption in late 2011/early 2012. This Design Guide refers to the need for improvements to the existing Alconbury, Bluntisham and Whittlesey Household Waste Recycling Centres (proportionate to the scale of housing growth in Huntingdonshire District and neighbouring authorities). These improvements will need to be listed, along with their costs within the IPL. County Council Officers will provide further information in relation to these costs.

Suggested Response

Improvements to the existing Household Waste Recycling Centres at Alconbury, Bluntisham and Whittlesey need to be added to the IPL.

Green Infrastructure/Biodiversity

Core Strategy Policy CS10 outlines contributions to infrastructure required by new developments which includes strategic green infrastructure and biodiversity enhancement/mitigation. However, the table at paragraph 2.29 fails to include biodiversity under the CIL funded infrastructure column. Whilst recognising that there cannot be double counting with S106 contributions, biodiversity needs to be included for CIL contributions as well.

The CIL schedule should also include the Green Infrastructure Strategy 2011 in the Policy Background section.

Suggested Response

The above amendments should be made to recognise the importance of green infrastructure and biodiversity

APPENDIX B – Draft Developer Contributions SPD

Paragraph 1.10 of this report explains the background and purpose of the Draft Developer Contributions SPD. Officers have assessed the document and are proposing the following comments:

Range of Developer Contributions

P9 – Para 3.19

Please add 'Transport/Highways' and 'Archaeology' – The County Council has in the past secured archaeology contributions through S106.

Suggested Response

That the above amendments be made to ensure all relevant County Services are included.

Inflation

P13 – Para 4.15. The BCIS All-In Tender Price Index is published quarterly although it is proposed that an annual update is applied. It is suggested also that RPI isn't used if the All-In Tender Price Index is abolished.

Suggested Response

We agree that all contributions be linked to the BCIS All-In Tender Price Index or any replacement thereof (not necessarily the RPI).

Administrative Charges

P14 – Para 4.16/4.17. The CIL Levy admin charge of 5% needs further discussion as to whether this is the right amount and further detail is needed on the scope of how the money will be spent.

Suggested Response

County Officers would welcome further discussions on the scale of admin fee and how the monies will be spent and in particular, the extent to which any of that funding will be available to the County Council.

Spending Financial Contributions

P15 – Para 4.32. A 5 year time limit is generally acceptable for smaller residential schemes for education and libraries. For the major developments of 200 units plus, the County Council would be seeking to have a 10 year clawback period. This is what has been negotiated on all of the Cambridge Southern Fringe applications for example. 10 years is what we seek on all transport contributions.

Suggested Response

Greater flexibility should be included in the wording for setting clawback time limits. The County Council seek a 10 year time limit for most transport schemes.

Green Space

P21 - The document does not make provision to secure planning obligations from developers for biodiversity in order to compensate for loss or damage created by a development and/or to mitigate the impact of development.

Developer contributions are required for ecology and biodiversity. These may apply to any scale of development depending on the specific characteristics of a site and the potential direct and indirect impacts of the development on the site and its linked areas (e.g. water corridors, green corridors, foraging areas).

Guidance on the form in which contributions will be required should be provided within this document e.g.

- Restricting development so as not to harm existing protected habitats/species
- Specific measures to meet the individual requirements of an identified species and / or habitat
- On-site works required to enhance existing features, e.g. woodlands, hedgerows, ponds, grassland, bird nesting boxes, bat roosting boxes
- Creation of new features within the site, e.g. wildlife planting, pond, nature reserve area
- Financial contributions to enhance or create appropriate assets nearby e.g. accessibility improvements, interpretation facilities, nature reserve, stepping stone habitats
- Programme of monitoring and / or management associated with the development site or a nearby related site

Suggested Response

Further guidance on ecology and biodiversity contributions should be added, with the inclusion of the above bullet points.

Footpath and Access

P26 – Para C8. It is not agreed that footpath and/or access contributions will only be sought on residential developments of 200 units or above once CIL is in place. There might be site specific issues for smaller developments in relation to footpaths/access that may merit a contribution.

P26 – Para C9. Improvements to bridges and surface improvements should specifically be noted.

Suggested Response

The threshold for the rights of way contribution needs to be amended and additional wording is required in paragraph C9.

Health

P28 – Adult Social Care needs to be considered in this category. It is suggested that the heading of the section is changed to ‘Health and Adult Social Care’. The vision for adult social care is ‘to develop communities in which older people and adults affected by disability are truly engaged and exercise choice and control over their lives.

Contributions for adult social care might be necessary for larger development proposals and would be negotiated on a case by case basis.

Suggest Response

Adult Social Care needs to be recognised in the ‘Health’ Section.

Libraries and Life Long Learning

P33 - Para F1 and F8. The County Council should be referenced as the responsible authority for negotiating and securing these contributions as it’s a County statutory responsibility.

Suggested Response

Minor amendments required to address the above point.

Education and Schools (including Early Years and Children’s Centres Provision)

P35 - Para G2. Please reference the County Council as the responsible authority for negotiating and securing these contributions as it is a County statutory responsibility.

Paras G5 and G10 – Please remove reference to the Guide for Planning Officers and Developers as this document was not shared with Members and therefore has no formal endorsement.

Para G8 - County Council needs to be added instead of District.

General point – if there is a need for pre-school, primary and secondary contributions – the cost per house could be £12,581. This will be our approach to securing education contributions in the interim period before CIL is adopted. This level of contribution may result in additional viability claims, and therefore applications will need to be looked at on a case by case basis.

Suggested Response

Minor amendments required to address the above points.

Transport

The Huntingdonshire Draft Developer Contributions Supplementary Planning Document (SPD) contains very little information on how transport contributions will be secured before the CIL is adopted. This is a critical point that needs to be rectified. Further discussions are needed between Officers to establish how best to

present information on transport. Limited information on transport contributions in the SPD is unacceptable and would incorrectly suggest that developers would not be required to make such contributions. In addition, transport contributions will need to be sought from developments prior to the implementation of CIL. When CIL is in place, as revenue contributions are not covered by CIL, the SPD needs to state that transport revenue contributions will be sought (e.g. for Bus Services).

Suggested Response

There needs to be a section within the document which explains how transport/highway contributions will be dealt with prior to the adoption of CIL.

Travel Plans

Section 106 agreements have to date been the major tool to require travel plans to help mitigate the effect on road infrastructure of the new development.

This SPD makes no mention of travel plans or the future procurement of these.

Suggested Response

The SPD should include a section on travel plans and how travel plans will be required for new developments.

Waste Management

As stated above, additional improvements at Alconbury, Bluntisham and Whittlesey Household Recycling Centres need to be added to the IPL so that waste management contributions can be secured through CIL. Prior to the adoption of CIL, the Draft SPD should make reference to the County's RECAP Waste Management Design Guide which will provide the basis on which S106 negotiations will be made. The County Council intends to undertake a second round of public consultation on the RECAP Waste Management Design Guide in September.

P40 – Residential Wheelie Bins. Reference is made to developer contributions being sought for the provision of wheelie bins which is consistent with the content of Design Guide. However, there is no reference made to contributions for containers to enable greater recycling within homes and bring sites (which are described as mini recycling centres in para H5 of the Draft SPD).

Suggested Response

Reference should be made to the RECAP Waste Management Design Guide and the District should also consider seeking contributions for containers to enable greater recycling within homes and bring sites.