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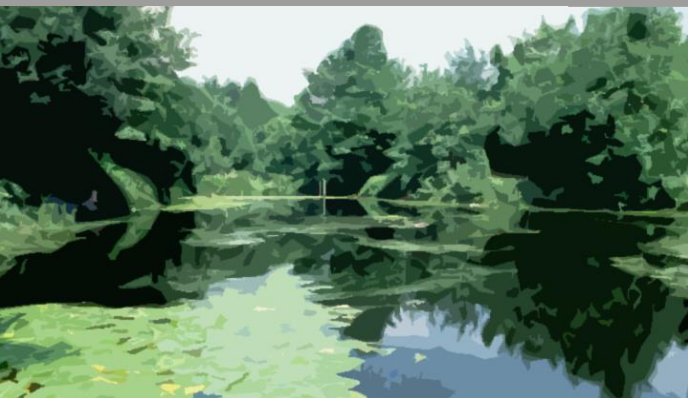
**Bury**  
Council



Supplementary Planning Document 17

Developer Contributions for  
Education

September 2024



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# 1 Introduction

- 1.1 This Supplementary Planning Document (SPD) sets out the Council's approach to seeking developer contributions towards education. It has been prepared accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the National Planning Policy Framework 2023 and supports Policy JP-P5: Education, Skills and Knowledge of the adopted Places for Everyone Plan.
- 1.2 Planning Obligations are also known as developer contributions and are secured in conjunction with a related planning permission under Section 106 (S106) of the Town and Country Planning Act 1990 (as amended). S106 contributions are an established mechanism to secure the delivery of services or facilities needed as a result of new development. Contributions to infrastructure can be delivered by way of physical works on or off-site, land transfer or financial contributions.
- 1.3 The National Planning Policy Framework (December 2023) (NPPF) specifies that plans should set out the contributions expected from development. This should include the provision of infrastructure, such as that needed for education. This approach is supported by guidance from the Department for Education on securing developer contributions for education which clearly states that the Government expects local authorities to seek developer contributions towards school places that are created to meet the need arising from housing development.
- 1.4 To support the supply of school places, Bury Council and local schools receive grants from Central Governments. However, programmes such as the Basic Need Grant and Free Schools and other capital funding do not negate housing developers' responsibility to mitigate the impact of development on education. Where a new housing development will create an unacceptable impact on pupil places within schools, the Council will seek contributions to ensure adequate provision of education infrastructure.
- 1.5 Financial contributions will be negotiated by the Council and the developer at planning application stage and will be secured through a planning obligation. The planning obligation must specify the amount of the contribution and when it will be paid. The Council will use this SPD to calculate the amount of contribution required in each case.
- 1.6 Once adopted, this SPD will be a material consideration in planning decisions. If development proposals do not comply, the SPD may be used as a reason for the refusal of planning permission.

# 2 Policy Context

## National policy and guidance

- 2.1 The revised National Planning Policy Framework (NPPF) came into force in December 2023. This document sets out the government's planning policies for England and how these are expected to be applied. The NPPF is a material planning consideration of significant weight. This means that it must be taken into account, where it is relevant, in deciding planning applications and appeals.
- 2.2 Paragraph 20 of the National Planning Policy Framework (NPPF) states that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for community facilities such as education.
- 2.3 Paragraph 34 states that plans should set out the contributions expected from development. This should include setting out the levels and types of infrastructure such as that needed for education.
- 2.4 Paragraph 99 of the NPPF refers directly to education provision, highlighting the importance of schools in promoting healthy and safe communities. It states:
- “It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*
- A) Give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and*
  - B) Work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.”*
- 2.5 For further information on the NPPF and any emerging policy updates, visit the NPPF website at: [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework)

## Planning Practice Guidance

- 2.6 The Government's Planning Practice Guidance (PPG) adds further context to the NPPF. In September 2019, the PPG updated its guidance on planning obligations towards education. In setting out what funding is available for education, the PPG (Paragraph: 007 Reference ID: 23b-007-20190315) states that Government provides funding to local authorities for the provision of new school places, based on forecast shortfalls in school capacity. There is also a central programme for the delivery of new free schools.
- 2.7 It also states that funding is reduced however to take account of developer contributions, to avoid double funding of new school places. Government funding and delivery programmes do not replace the requirement for developer contributions in principle.
- 2.8 Plan makers and local authorities for education should therefore agree the most appropriate developer funding mechanisms for education, assessing the extent to which developments should be required to mitigate their direct impacts.
- 2.9 Paragraph: 008 Reference ID: 23b-008-20190315 of the PPG sets out what contributions are required towards education. It states that plans should support the efficient and timely creation, expansion and alteration of high-quality schools. Plans should set out the contributions expected from development. This should include contributions needed for education, based on known pupil yields from all homes where children live, along with other types of infrastructure including affordable housing.
- 2.10 Plan makers and decision makers should consider existing or planned/committed school capacity and whether it is sufficient to accommodate proposed development within the relevant school place planning areas. Developer contributions towards additional capacity may be required and, if so, this requirement should be set out in the plan. Requirements should include all school phases age 0-19 years, special educational needs (which could involve greater travel distances), and both temporary and permanent needs where relevant (such as school transport costs and temporary school provision before a permanent new school opens).
- 2.11 Plan makers should also consider whether pupils from planned development are likely to attend schools outside of the plan area and whether developer contributions may be required to expand schools outside of the area.
- 2.12 When local authorities forward-fund school places in advance of developer contributions being received, those contributions remain necessary as mitigation for the development.

## Department for Education Guidance

- 2.13 The Department for Education (DfE) oversees children's services and education in England. Local Authorities are responsible for making sure there are enough school places available in their area. The DfE provides Basic Need capital grant funding which support local authorities in meeting this statutory duty.
- 2.14 In August 2023, DfE published guidance entitled 'Securing developer contributions for education'. This document acknowledges that housing development should mitigate its impact on infrastructure relating to education. The guidance recommends that developer contributions should be sought for a range of school places, where need arises. This includes places for early years, primary, secondary and those with special educational needs and disabilities (SEND).
- 2.15 At the same time, the DfE also published its guidance on 'Estimating Pupil Yield from Housing Development'. This sets out the recommended approach to calculating pupil yield from housing development for the purpose of securing developer contributions.
- 2.16 Alongside this, the Pupil Yield Dashboard was also published. This data comprises all developments in England that have 10 or more dwelling that were started and completed between 2008 and 2022. From this data, pupil yield figures have been provided at each local authority level. This guidance recommends that these figures can act as baseline pupil yield factors which local authorities can choose to adopt, supplement and update over time. Alternatively, local authorities can produce bespoke pupil yield evidence.

## Places for Everyone

- 2.17 Places for Everyone (PfE) is a joint plan of nine Greater Manchester districts and was adopted on 21<sup>st</sup> March 2024.
- 2.18 One of the key aims of PfE is to set out where we will build the new homes we need, where our businesses will locate to sustain and create jobs for our people, what infrastructure is needed to support the development and to protect and enhance our towns, cities and landscapes. The Plan covers a timeframe up to 2039. It is clear that Greater Manchester and Bury will see considerable population and housing growth over the plan period that will, in turn, lead to increased pressures on infrastructure, such as education.
- 2.19 This SPD supplements PfE **Policy JP-P5: Education, Skills and Knowledge** which states that significant enhancements in education, skills and knowledge to benefit existing and new residents will be promoted, including by:

1. Enabling the delivery of new and improved accessible facilities for all ages, such as early years, schools, further and higher education, and adult training to ensure our workforce is ready to benefit from new employment opportunities.
2. Ensuring the delivery of sufficient school places to respond to the demands from new housing, such as through:
  - a. Working with education providers to forecast likely changes in the demand for school places; and
  - b. Where appropriate, requiring housing developments to make a financial contribution to the provision of additional school places and/or set aside land for a new school, proportionate to the additional demand that they would generate.
3. Supporting the continued growth and success of the university sector, such as through:
  - a. Enhancing the existing campuses and developing new ones;
  - b. Strengthening the world-leading research capabilities and promoting opportunities for business spin-offs; and
  - c. Continuing to help develop Greater Manchester as the UK's best destination for students.

# 3 Advice

- 3.1 Quality education provision is at the heart of sustainable communities and, therefore, should be a fundamental consideration of all new housing developments that have the potential to generate a significant increased demand for school places. Where new housing development creates a demand for school places in excess of those available, it is critical that developers make a contribution towards school places in order to mitigate against the effect of any new development on local infrastructure.
- 3.2 Contributions towards education will only be sought for residential developments of 10 dwellings and above and only where there is a projected shortfall of primary and/or secondary places at schools within the local area of a development.
- 3.3 Currently, primary pupil forecasts are calculated using data supplied by the Northern Care Alliance and are updated annually. Forecasts are also revised termly following each school census, to reflect movement in and out of the Borough during the academic year.
- 3.4 Secondary pupil forecasts are based on known cohorts of children within the primary sector and are adjusted annually to reflect movements both in and out of the Borough and cross border movements. Forecasts are also revised following each school census.
- 3.5 However, these forecasts do not take into account any additional requirement for pupil places that will be generated from new housing developments within the Borough. As such, where demand for school places extends beyond the capacity of existing or planned/committed schools within the relevant school place planning area, the Council will seek to ensure that a developer makes appropriate mitigation to offset the additional demands generated from their development.
- 3.6 The Council will, in the first instance, seek to direct investment associated with increasing the number of pupil places towards strengthening Bury's existing established education base. This will typically be through the physical expansion of existing schools in the area. This space could be either classroom or other accommodation such as a new hall or works to improve the condition of buildings to bring them back into use or by repurposing existing space. Expanding existing schools presents a great opportunity to secure the long-term future of education provision and use land in a sustainable way.
- 3.7 Where it is not feasible to expand facilities on an existing nearby school site, alternative sites for provision will be considered, either for:



- The expansion of an existing school that is slightly further away but can provide additional pupil places within the same or adjacent pupil planning area;
- The expansion of an existing school onto an additional site; or
- The provision of an entirely new school.

3.8 In some instances, it may be anticipated that more than one housing development may materialise which would generate a need for new school provision in a local area. Where possible, the Council will endeavour to deal with proposals in ways which will enable the financial burden of the school provision to be shared commensurately between the prospective housing developments.

3.9 In line with DfE guidance, contributions may also be used to fund temporary solutions to meet education needs where it is not possible to open a permanent new school at the point of need. When a permanent new school is delivered (or the relevant financial contribution is received), no further contributions to temporary provision will be required.

## Pupil Planning Areas

3.10 For pupil place planning purposes, the primary phase is broken down into six planning areas, each representing one of the local townships of Ramsbottom, Tottington, Bury, Radcliffe, Whitefield and Prestwich. Secondary schools are less sensitive to immediate geography and there is far greater movement of students across the Borough, which suggest a less localized solution to demand pressures. Location of new secondary school places is more likely to be determined strategically, rather than on geographical proximity to specific housing developments. The Plan at Appendix 1 identifies the distribution of the six pupil planning areas across the Borough.

3.11 The Council will publish information annually on primary school capacity across each of the six planning areas. This will determine whether it is appropriate to continue to seek financial contributions from new housing development across all parts of the Borough, having regard to existing capacity.

## Exemptions

3.12 Education contributions will be sought in relation to outline or full applications for planning permission for residential developments of 10 or more houses or flats with two or more bedrooms and which are likely to result in the need for additional education provision.

- 3.13 We will not seek developer contributions towards education from the following:
- One-bedroom houses and apartments; and
  - Non-family units such as sheltered accommodation, retirement apartments, residential institutions and houses in multiple occupations.
- 3.14 These types of housing will therefore not be included in any calculations under this SPD.
- 3.15 For the avoidance of doubt, the requirements set out in this report are applicable to affordable housing schemes. Affordable housing development will increase the population in a pupil planning area and create permanent demand for school places and will therefore require provision for additional pupil places to be made.

## Approach to seeking developer contributions towards education provision

- 3.16 All major planning applications for 10 or more dwellings will be assessed by the relevant Council officers. The assessment will establish whether the proposed development will have an unacceptable impact on education provision in the pupil place planning area.
- 3.17 In most cases the Council will apply a formula-based approach to calculate the financial contribution towards education provision that will be sought from new housing development. The financial contribution secured via this mechanism will enable the Council to fund the capital infrastructure works associated with addressing the increased pressure on school provision that the development will generate.
- 3.18 New housing development of 10 or more dwellings will be expected to make a financial contribution towards education provision based on the following calculation:

$$\text{Number of dwellings} \times \text{Pupil yield factor} \times \text{Cost per pupil place} \\ = \text{Financial contribution}$$

- 3.19 The planning obligation will specify that the contribution will be spent on the provision of and/or improvements to educational provision within the Borough. This will relate to creating the additional educational provision, facilities or early years places needed to accommodate the new development or ensuring a setting is in an appropriate condition to accept pupils.

- 3.20 This will typically be within the pupil planning area within which the development lies. However, in certain circumstances it may be appropriate for contributions to be directed towards facilities within an adjacent pupil planning area, where a development would result in additional pressure on these facilities.
- 3.21 For SEND provision, we will identify projects and direct funds appropriately to meet the expected increase in need. Contributions may be pooled towards additional teaching space in a special school or a SEND unit at a mainstream school. They could also be used for school building alterations that increase a mainstream school's capacity to cater for children with special educational needs.
- 3.22 For outline applications, the amount of contribution may not be known. However, an obligation will be required at the outline stage that links the amount of contribution to be made to the calculation formula set out within this SPD. The contribution requirement will then be finalised once the Reserved Matters approval has been secured. This will take into account, consideration of up-to-date pupil yields and build cost estimates.

## Pupil Yield Factor

- 3.23 The DfE pupil yield dashboard has been created as the result of a plan to reduce inconsistencies and improve baseline data available to local authorities. The DfE has worked with the Office for National Statistics (ONS) to produce pupil yield data for all local authorities in England.
- 3.24 This data provides a long-term profile of the number of recorded pupils aged 2-19 in mainstream education, the distribution of these pupils by tenure and size of dwelling and the number of pupils attending specialist provision (special schools, pupil referral units and other alternative provision) and the proportion of pupils in mainstream or specialist settings with Education, Health Care plans (EHCP). Pupil yield factors are then determined from this data at local authority level by education level, needs and housing characteristics. The guidance makes clear that local authorities can choose to adopt, supplement and update this data over time. Alternatively, local authorities can produce bespoke pupil yield data.
- 3.25 Given that the DfE's pupil yield evidence is the most up to date data currently available, this will be used to calculate the estimated number of pupils to arise from new housing development. However, in line with the DfE Guidance, we will update pupil yields when this is refreshed. This will also be updated when more evidence is gathered locally. Currently, 1 dwelling, proposed as part of a new residential development, will yield 0.25 of a primary school place and 0.13 of a secondary school place.

- 3.26 The identified yield will need to be accommodated through either the existing provision, or where it is found that there is insufficient capacity of school place provision in the area, through developer contributions towards new provision. This will be determined at application stage. However, any pupil yield resulting from the proposed development which can be accommodated through existing provision will be discounted from the contributions calculation.
- 3.27 DfE's guidance on delivery of schools to support housing growth and the Pupil Yield Dashboard can be found here: [Estimating pupil yield from housing development \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

## Cost Estimates

- 3.28 For the cost of school places, the Government recommends using figures from the latest Local Authority Scorecard as a basis of the cost per pupil place. This is published yearly by the DfE usually in June. The costs outlined in this SPD were published on the 27<sup>th</sup> June 2024.
- 3.29 Where the education contribution has not identified a new school requirement the 'Permanent Expansion' national average costs per place will be used. The latest costs are provided below:

### National Primary

Type of School Place Type	Cost Estimate
Permanent Expansions	£19,989
New Build	£23,865

### National Secondary

Type of School Place Type	Cost Estimate
Permanent Expansions	£27,492
New Build	£28,912

- 3.30 These up to date costs can be found here: [Local authority school places scorecards, Reporting year 2023 – Explore education statistics – GOV.UK \(explore-education-statistics.service.gov.uk\)](https://explore-education-statistics.service.gov.uk)
- 3.31 As set out by the DfE, we have assumed that the cost for an early year's place will be the same as a primary pupil place. Similarly, we have assumed that the cost for a 16-18 pupil place is the same as a secondary pupil place.
- 3.32 SEND costs are based on information from the National Cost Benchmarking Report, uplifted with ONS inflation data (or such update or other Department for Education (DfE) recognised report as may replace or supersede it). See the most recent version of the study here: [Cost of School Buildings –](#)

- 3.33 The cost of a new school or extensions to an existing school will vary depending on size, location, and facilities. As construction inflation is currently high, the detailed figures set out above, will be subject to periodic reviews to reflect updated DfE school place scorecard information.

## Strategic Sites

- 3.34 Large Strategic sites of more than 200 dwellings may require additional primary infrastructure to support them. The scale of the infrastructure needed will depend on whether existing schools can be expanded. It would also depend on what other housing developments in the area may be coming forward in the short to medium term future.
- 3.35 Where it is not practicable for the Council to expand capacity within existing schools sufficient to accommodate the additional requirements for pupil places that will be generated by a development and there are no alternative solutions available, the Council will negotiate with the developer to ensure that appropriate provision is made for the pupil place requirement that the development would generate. In such circumstances, the developer will be required to set aside land for the provision of a school. The value of the land will be taken into consideration when determining the financial contribution required.
- 3.36 Where land is to be set aside for a new school on a site which is in multiple ownership collaborative working will be required between the various landowners to come to an agreed position on the location of the new school on the site.
- 3.37 Where land is to be set aside for a new school, the Council would need to ensure that this is of an appropriate size and location. The land would need to be of a sufficient size to accommodate a new school building and its associated outdoor recreation space. The site should also be accessible to the catchment it is intended to serve.
- 3.38 Where land is to be set aside for a school, the trigger for the release of the new provision will be determined on a case-by-case basis to allow for flexibility in relation to the timing of release of educational facilities.
- 3.39 the school should be operational at a sufficiently early stage in the phasing of the overall development in order to ensure that the demand for school places can satisfactorily accommodated as the development is built out without causing pressure elsewhere. It would therefore normally be appropriate for the Council to use a planning condition that requires the

school to be complete and available for use before defined phases of the development may proceed.

## Worked Example

3.40 For information, a worked example contribution is provided below:

### **Education Contribution Worked Example**

Proposed Development size: 100 homes

#### **Amount of school places required:**

Primary school places:  $100 \times 0.25 = 25$

Secondary school places:  $100 \times 0.13 = 13$

Total school places to be accommodated as a result of the proposed development  
=

#### **Expansion/development cost per place**

Primary school provision:  $\pounds 19,425 \times 25 = \pounds 485,625$

Secondary school provision:  $\pounds 26,717 \times 13 = \pounds 347,321$

Total school places expansion/development cost:  $\pounds 832,946$

# 4 Implementation

## Pre-application Discussions

- 4.1 The Council appreciates that developers will require certainty and expect to know the extent of any financial contributions necessary to mitigate the effects of their development prior to submitting a planning application to ensure the viability of their scheme. We therefore recommend that that pre-application advice is sought before making a planning application.
- 4.2 This provides an opportunity to start discussions with planning officers and other relevant colleagues about the proposals. It also means that the developer contributions likely to be required are made known to the developer as early as possible in the decision-making process.
- 4.3 Details of the pre-application process can be found on our website at: [Pre-application advice - Bury Council](#)
- 4.4 Following these discussions, the planning application submission should clearly set out how the policies of the development plan will be addressed, including the provision of infrastructure. 'Heads of Terms' for the S106 agreement must be agreed prior to recommendation on the planning application.

## Viability

- 4.5 All developer contributions including education contributions required by, or to achieve compliance with, local or national policies will be assessed during the consideration of the planning application. Applicants should ensure that development proposals adhere to all relevant development plan policies and that these requirements are factored into land value.
- 4.6 This reflects the NPPF, which states that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is therefore up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage and, where needed, provide evidence of what has changed since then. Overpayment for land will not be accepted as a reason for reducing contributions.
- 4.7 Where an applicant intends to submit a viability assessment to negotiate a reduced contribution, this must be received before the validation of the planning application. The viability appraisal will be independently assessed by consultants acting on behalf of the Council and the cost of this will be covered

by the applicant. A viability appraisal summary will be included within committee reports where relevant and all Viability Assessments will be published on the Council's Website.

- 4.8 A revised viability assessment will be required where material changes are made following the submission of the planning application, or where there are delays where issues have not been resolved within the timescales originally envisaged.

## Drafting of S106 Agreements

- 4.9 S106 agreements will normally be drafted by the Council's Legal Services team. Applicants will be required to pay the Council's reasonable costs incurred in drafting and completing the agreement.
- 4.10 In all circumstances where a legal agreement is required, the applicant would be expected to provide details of land ownership at the beginning of the application process and would be a validation requirement. These should be copies of the Title document and plan obtained within the preceding three months from the Land Registry, or if the land is unregistered, copies of the most recent conveyance being at least 15 years previous.
- 4.11 All landowners and parties holding an interest in the land will also need to be party to the legal agreement. If the site is subject to a mortgage, the mortgage will also need to enter into the legal agreement.
- 4.12 A S106 proforma is available on the Council's website and should be submitted alongside any planning application that would meet the thresholds defined within this document and be submitted with the planning application documentation.

## Transfer of Land

- 4.13 On strategic sites where a new school is required on-site, or where an existing school is to be extended, there may be the option for the developer to build the facilities themselves to the Council's design. This will depend on the specific details of the development and may include the transfer of land to the Council, in addition to the build. In such cases, developers will be required to pay the Council's legal fees in respect of the land transfer.
- 4.14 In cases where a developer chooses to retain responsibility of the land, they will be bound to keep hold of it and maintain it to a specification agreed with the Council in perpetuity.



## Indexation

- 4.15 Financial contributions are based upon the costs of infrastructure or services. Financial contributions will be indexed to ensure that they retain their original 'real value'. The base date and base value of the indexation will be stipulated when costs are prepared. An appropriate index will be used for the type of infrastructure or services sought.

## Timing/Phasing of Payments

- 4.16 The Council will require financial contributions to be paid prior to the implementation of the planning permission or as otherwise agreed as part of a programme of staged payments. Legal costs and administration charges will need to be paid prior to the completion of the agreement unless otherwise agreed in writing by the Council.
- 4.17 For large strategic sites, there may be cases where contributions can be phased. There must be specific evidence to justify this, and it is the responsibility of the developer to demonstrate the benefits of phased payments. This must be agreed by the Council before the signing of the legal agreement. Trigger dates will be set for phased payments and will be laid out in the legal agreement. For example, S106 contributions could be payable by instalments with 50% paid upon commencement of development and the remaining 50% paid upon first occupation of the development.
- 4.18 The Council will calculate the total financial contribution payable including interest and/ or indexation which will be made available to the developer. On receipt, financial contributions will be transferred to the relevant internal department who will be responsible for spending the contribution.
- 4.19 Individual legal agreements will specify timeframes for financial contributions to be spent. The standard period for this will be 10 years from the date of receipt to the point at which it is allocated, as recommended by the DfE guidance. For some planning applications, particularly those that are outline or phased, a longer timeframe may be more appropriate. If monies remain unallocated at the end of the relevant contribution period, they will be refunded.
- 4.20 Should we decided to forward-fund school places in advance of the financial contribution being received, the payment of the contribution will be used to reimburse the Council for its forward funding which could include for example repaying borrowing that has been incurred as a result. This reimbursement will continue to be deemed necessary for the development to be acceptable, irrespective of the time that has elapsed since the Council has incurred the expenditure.

- 4.21 Following receipt, financial contributions will be held in interest bearing accounts. They will be individually identifiable due to each contribution being allocated a unique financial code. The financial contributions will only be spent on increasing education provisions related to their development.

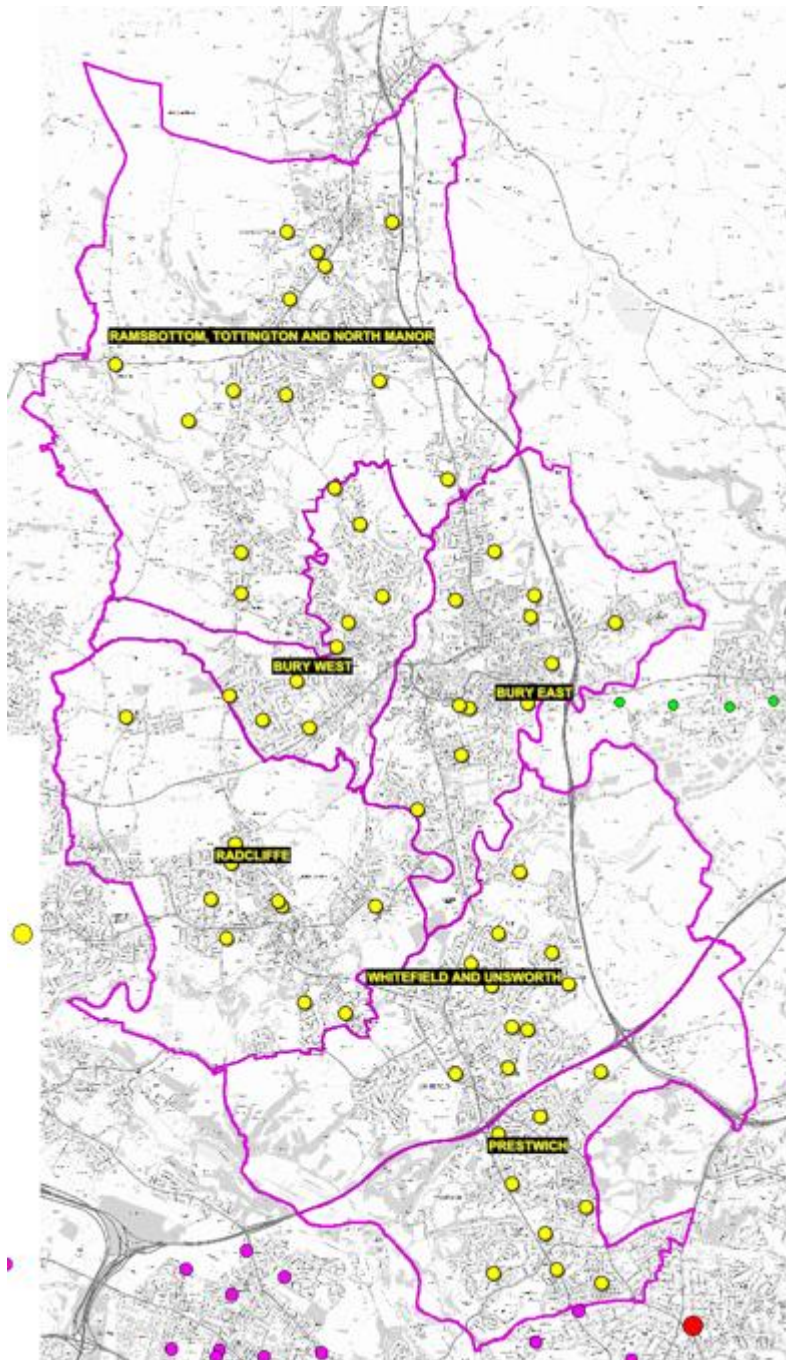
## 5 Monitoring and Reporting

- 5.1 We will monitor compliance with legal agreements, to ensure that financial contributions and non-financial obligations are delivered on-time. Once an agreement has been signed, administrative costs are incurred on tasks such as ensuring on-site measures are provided, financial contributions are received, and contributions are spent in accordance with the terms of the obligation. This requires compliance checks, monitoring, project management and implementation by the Council.
- 5.2 Developer's entering into s106 agreements will be required to pay a monitoring fee to cover the costs incurred in monitoring developer contributions. The fee will be dependent on upon the nature and complexity of the contribution being monitored.
- 5.3 Where there is evidence of non-compliance with a planning obligation, the Council will instruct the Council's Legal Services team to take appropriate action to secure compliance. The Council will aim to recover all reasonable administration costs incurred which may include administration, correspondence and site visits. Non-compliance with a planning obligation could include failure to comply with the obligation, failure to notify the Council of a due payment and non-payment.
- 5.4 The Council is required to publish information on monies received and spent relating to new developments secured through s106 agreements. This information is published in the Council's Infrastructure Funding Statement and can be found on our website at [Infrastructure funding statement - Bury Council](#)

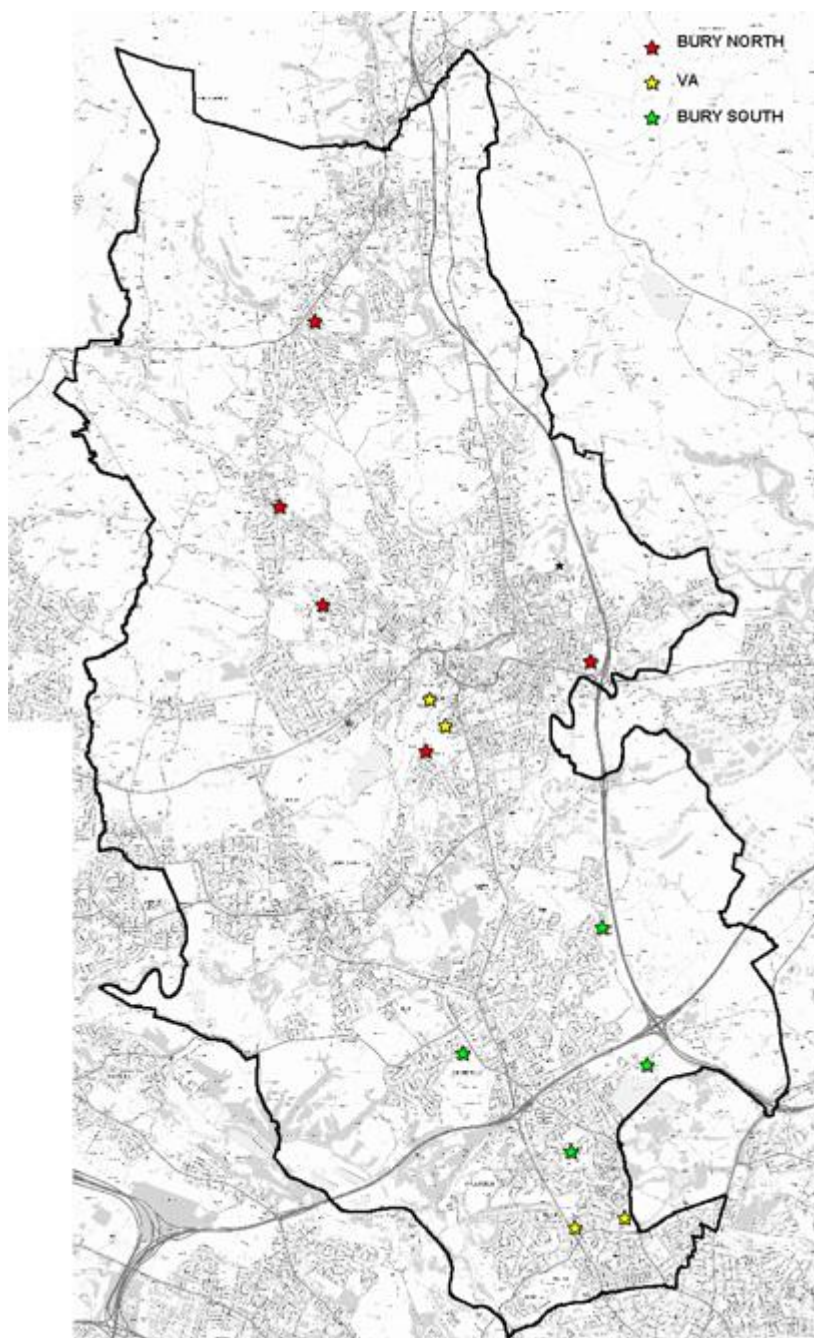
# Appendix 1-Pupil Planning Areas



## Bury Primary School Pupil Planning Areas



## Bury Secondary School Pupil Planning Areas



Bury  
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