



Affordable Housing Supplementary Planning Document

Consultation Statement

Prepared in accordance with Regulation 12 of the
Town and Country Planning (Local Development)
(England) Regulations 2012

April 2020

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1. Introduction

- 1.1. Following the adoption of the Council’s Development Management Plan (DMP) in September 2019, the Council has produced an Affordable Housing Supplementary Planning Document (SPD) to provide detailed guidance on the Council’s requirements for affordable housing, specifically guidance relating to DMP policy DES6 “Affordable Housing” and elements of DMP policies DES4 “Housing Mix”, DES5: “Delivering High Quality Homes” and DES7 “Specialist Accommodation”.
- 1.2. Regulation 8 of the Town and Country Planning (Local Planning) (England) Regulations (2012)¹ requires that there be no conflict between a SPD and the adopted development plan. From the adoption of the DMP, DMP Policy DES6 superseded Core Strategy Policy CS15 “Affordable Housing”, which was the basis for the previous Affordable Housing SPD adopted in 2014 (and which is now revoked).
- 1.3. In addition to changes in local policy, a number of other changes have been made for consistency with updated national policy, including the vacant building credit and the amended (2019) national planning definition of affordable housing.
- 1.4. The SPD does not and cannot introduce new policy. Instead it provides clear up to date guidance that, once adopted, will help developers and the Council in implementing DMP Policy. On adoption, it is a material consideration in planning determinations.
- 1.5. To ensure that the evidence informing the SPD is up to date, in 2019 the Council commissioned external specialist consultants to prepare a Housing Needs Study for the Council. This included details of current and future type, size and tenure of affordable homes needed.

Purpose of the Consultation Statement

¹ From here referred to as “The Local Plan Regulations”

1.6. Regulation 12 (a) requires that before the Council adopts a SPD we must prepare a Consultation Statement setting out:

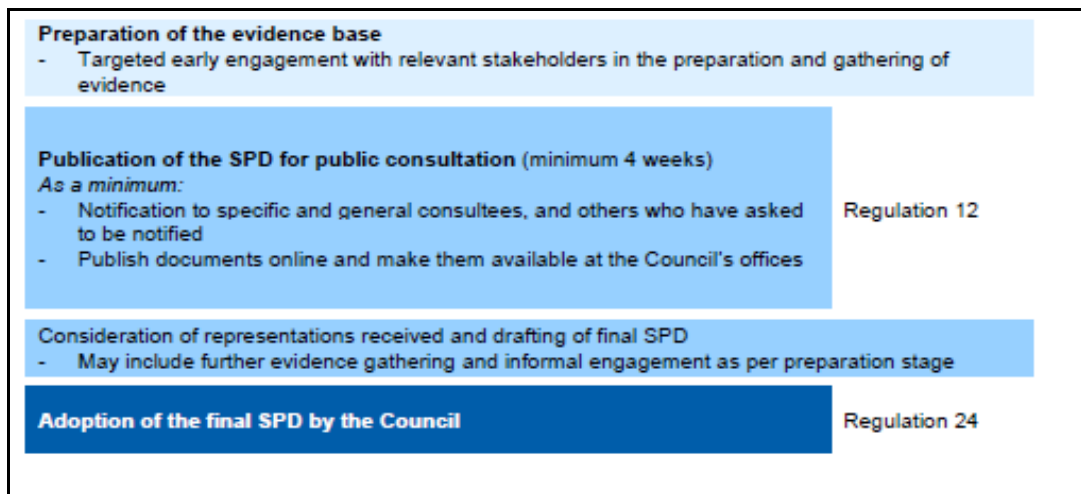
- (i) the persons the local planning authority consulted when preparing the supplementary planning document;
- (ii) a summary of the main issues raised by those persons; and
- (iii) how those issues have been addressed in the supplementary planning document

1.7. This Consultation Statement has been prepared in accordance with Regulation 12(a) of the Town and Country Planning (Local Development) (England) Regulations 2012 (SI No 767, 2012). All references to “regulation(s)” in this document are to these Regulations unless otherwise stated.

2. Preparing the SPD

2.1. This SPD has been prepared in accordance with the legal requirements of the Town and County Planning (Local Planning) (England) Regulation 2012 (Local Plan Regulations) and the requirements set out in the Council's Statement of Community Involvement in Planning (SCI) (April 2019)²³. The process is summarised in **Figure 1 and 2** below.

Figure 1: Process of preparing a SPD



Source: RBBC (2019) *Statement of Community Involvement*

² Available at: http://www.reigate-banstead.gov.uk/download/downloads/id/5437/statement_of_community_involvement_in_planning.pdf

³ The SCI summarises how the Council will engage its communities in its planning functions, including in the preparation of SPDs.

Figure 2: Timeline for preparation of the SPD

Stage	Date
Early scoping and information gathering	July - August 2019
Preparation of draft SPD with relevant key individuals and organisations	August -October 2019
Executive approval for public consultation of the draft SPD and supporting documents	5 th December 2019
Consultation on draft SPD with supporting initial Consultation Statement, SEA/HRA/EqIA screening (minimum of 4 weeks)	January - February 2020
Representations received considered and draft SPD updated as relevant	February - March 2020
Adoption of the SPD (and revocation of 2014 Affordable Housing SPD) by Council’s Executive	April 2020
Publish SPD with final Consultation Statement and Adoption Statement	April 2020


Preparation of the Draft Affordable Housing SPD

- 2.2. In preparing the draft Affordable Housing SPD for consultation, we involved and sought the views of the individuals and organisations listed in **Table 2** below. Their suggestions were incorporated into the draft SPD for consultation.
- 2.3. As part of the preparation of the draft SPD we held a workshop meeting with representatives from the Council’s Housing/ Housing Strategy team, Planning Policy team, Development Management team and representatives from a number of housing associations working in the borough. This helped us to understand the current issues different bodies experience in the delivery of affordable housing in the borough and in particular helped to inform the design elements within the draft SPD.

Table 1 Individuals and organisations involved in preparing the draft SPD

Person / Organisation	Issues/ Comments Raised
<p>RBBC Housing Strategy and Projects Manager</p>	<p>At meeting on 01/08/19; suggested issues that should be considered by the SPD update include:</p> <ul style="list-style-type: none"> • Existing profile of stock of affordable homes in the borough and turnover of each size and type, as will inform size/type needed in future; • Do not include a draft S106 obligation in the SPD, as can date; • Do not include a list of “preferred Registered Providers in an Appendix, rather refer to contacting RBBC Housing Services and the website hosting a “live” page of providers that can be updated when needed; • Should refer to bedspaces for size units, rather than simply number of bedrooms; • Be specific about need for houses or flats; • Will discuss with Raven Housing (an affordable housing provider in the borough), how a “tenure blind” design can be achieved. For example, potentially social rented on the ground floor with direct ground floor access, and intermediate on 1st floor and market housing above, with a shared entrance and a shared “core”; • Meet with Raven Housing (and potentially other RPs active in the area) to

	<p>consider potential design solutions for tenure-blind design and layout;</p> <ul style="list-style-type: none"> • Also all facilities to be shared across tenures, although noted the potential difficulties with shared ownership and service charges; • If a proposed development is not viable with full policy compliance, could consider first reducing the number of affordable home rather than varying the tenure mix, and / or size and type of affordable homes. • Provided advice on rented tenures and whether “affordable rented” housing is actually affordable to people on the borough’s housing register with regard to Local Housing Allowance. • Advised RBBC Housing Service is currently producing a new Housing Delivery Plan, whose early findings should be taken into account in drafting the revised SDP.
<p>Housing Associations Raven Housing Trust and Orbit, and RBBC Development Management Officer at October 2019 meeting</p>	<ul style="list-style-type: none"> • Size of units should be specified in the SPD in terms of “bedspaces” as well as bedrooms • Design of future schemes – locations of affordable housing on site, clustering, registered providers preference to have separate “cores” or floors for different tenures if they are within the same building. • Tenure mix – preference for variation in the number of affordable home ownership products in order to deliver a greater number of social rented properties.

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- Funding – discussion regarding how registered providers bid for properties and therefore need not to be prescriptive to require identification of Registered Providers early in the planning process.
 - Discussion regarding the number of units that registered providers will be willing to accept on-site.
 - Cascade – preference for variation in the number of units in order to achieve desired tenure mix.

Consultation on the Draft SPD

- 2.4. Following executive approval on 5th December for public consultation on the draft Affordable Housing SPD, in accordance with Regulation 12(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 the Council undertook a statutory public consultation on the draft Affordable Housing SPD between 6th January and 8th February 2020.
- 2.5. During this consultation we wrote to all interested parties⁴ and we made the documents available on our website and in paper format at the main Town Hall and at the six libraries in the borough.
- 2.6. In accordance with Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 we accepted all representations received during the consultation period.

Representation Received

- 2.7. Following the formal consultation stage, the Council has considered the responses received and amended the draft SPD where necessary. A summary of the representations received and how they have been taken into consideration in finalising the SPD is detailed in Appendix 1.
- 2.8. The main issues raised during the formal consultation include:
 - The need for greater flexibility with regards to requirement for the type, size, mix and design of affordable housing provision
 - Queries regarding the need for two- and three-bedroom accommodation to be provided as 2-bedroom 4-person accommodation and 3-bedroom 6-person accommodation
 - Questions regarding affordable housing and perpetuity
 - Queries regarding whether we can be specific in relation to who undertakes viability works on behalf of applicants

Prior to finalising the necessary amendments, the LDF Scrutiny Panel reviewed a summary of the responses and the Council's proposed approach/

⁴ Specific and general consultees, prescribed bodies for the Duty to Co-operate and other individuals and organisations registered on the Planning Policy database for such purpose

amendments to the draft SPD. The committee were happy with the proposed responses.

Adoption of the SPD

- 2.9. Following adoption, the Affordable Housing SPD will become a material consideration in the determination of planning applications and will therefore need to be taken into consideration in the preparation of planning proposals for residential developments within the borough.
- 2.10. Upon adoption in accordance with Section 25 of the Planning Act 2008 and Regulation 15 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) the current 2014 Affordable Housing SPD will be revoked. We will bring this to the attention of people living or working in the borough.

Appendix 1: Consultation responses from Specific and General Consultees with resultant changes made to the SPD where relevant

Representor Respondent	Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD (where need to be addressed))	Amendments made to the SPD?
General Consultee (RBBC\Representor\004)	We are in the midst of a climate emergency. The fact that your department continues to prioritise factors other than insulation and microgeneration in setting planning policy is short sighted.	Noted. The Council is undertaking other work on the Climate Emergency.	N
General Consultee (RBBC\Representor\004)	Paragraph 5.35: Add an initial sentence to this paragraph to emphasise the importance of meeting Passivhaus or equivalent standards, as envisaged by the Government's Future Homes Standard.	Disagree. The requirement for Passivhaus energy standards would go beyond the role of the SPD. New developments energy efficiency standards are dealt with through Core Strategy Policy CS10 "Sustainable Development" and	N

		DMP Objective SC8 and DMP Policy CCF1 which require new residential (and non-residential) development to provide high standards of energy efficiency and the inclusion of renewable energy technologies.	
General Consultee (RBBC\Representor\0018)	Paragraph 5.27: Wording is unduly restrictive and if followed to the letter would prevent other affordable routes to home ownership from coming forward. To meet the needs of the widest range of households, suggest that the scope of affordable housing should be widened to include affordable rent to buy.	Disagree. The guidance in the Affordable Housing SPD was informed by a Housing Needs Assessment prepared by Icenl in 2019. This reviewed the needs for affordable housing in the borough in accordance with the revised definition of affordable housing in the NPPF. Taking into consideration the needs in the borough and comments from the Council's Housing Strategy team and selected Registered Providers recommended that the most appropriate form of affordable home ownership was shared ownership. This is reflected in Paragraph 5.27. Paragraph 5.28 does however allow for some flexibility on a site-by-site basis depending	N

		upon the specifics of the site.	
General Consultee (RBBC\Representor\0018)	Future Strategic Housing Market Assessments should include an assessment of the need for rent-to-buy housing, to inform future plan making and decision taking.	Noted.	N
General Consultee (RBBC\Representor\0018)	Paragraph 5.56: This is inconsistent with the NPPF which places no requirement on affordable housing to be retained “in perpetuity” (asides form at rural exception sites). Instead, the relevant definitions of affordable housing at Annex 2 of the Framework set out conditions for the retention of affordable housing and the recycling of subsidy and/or receipts. Reference to these should therefore be made in the SPD.	Disagree. Given the need for affordable housing in the borough, the Council requires affordable housing to be secured in perpetuity by planning obligation in order to comply with national planning policy for affordable housing or recycle the subsidy if the property is sold on to the market. This is reflected in the SPD. The revised NPPF glossary only provides advice for the retention of affordable housing for “other affordable routes to home ownership”. The proposed approach is in accordance with this guidance.	N
Horley Town Council	Support the aims of the draft SPD,	Noted.	N

(RBBC\Representor\0010)	especially the recognition that housing costs, particularly market rates for private purchase, are beyond a large number of our residents, and the proposals for how RBBC plan to address these issues.		
Horley Town Council (RBBC\Representor\0010)	Pleased to see the recognition of the need for social rented accommodation recognised in the SPD.	Noted.	N
Horley Town Council (RBBC\Representor\0010)	Welcome aims to maintain affordable housing in perpetuity but question whether this will conflict with tenants' rights under 'Right to Buy' legislation.	Noted. This requirement does not conflict with tenants' rights under 'Right to Buy' legislation as they are dealt with by different legislation (the s.106 requirement is dealt with via legal legislation, nor Right to Buy legislation).	N
Horley Town Council (RBBC\Representor\0010)	We hope that once the SPD is adopted that RBBC will seek to resist any attempts to dilute developers' contributions towards affordable/ social housing.	Noted. Developers will be required to comply with the guidance provided in the SPD once adopted as it will be a material consideration in determining planning applications.	N

<p>General Consultee (RBBC\Representor\0020)</p>	<p>It is important that policy is achievable and realistic for developers in viability terms and to ensure occupancy of new homes.</p>	<p>Noted.</p>	<p>N</p>
<p>General Consultee (RBBC\Representor\0020)</p>	<p>Paragraph 3.17: Question reference to “up-to-date” Local Plan. Disagree with the Council’s position that they are able to demonstrate a five-year housing land supply of 7.80 years. This position is based on the housing number in the Core Strategy which does not take into account the new Standardised Methodology for calculating housing need, as per NPPF. Given that the Core Strategy was adopted in 2014, and it is now over 5 years old, we believe that this should have been updated to reflect the adjustments to national policy, particularly in regard to housing</p>	<p>Noted. In accordance with Regulation 10A of the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended), the Council undertook a review of the Core Strategy to assess whether it required updating. The review looked comprehensively at each policy in turn, including Policy CS13 “Housing Delivery” and considered and concluded that there was no need to modify or update any of the policies of the Core Strategy at the time. The Core Strategy therefore continues to provide a robust, up-to-date and appropriate strategic policy framework for managing development in the borough. The review considered that 460 is still an appropriate housing requirement, the Council</p>	<p>N</p>

	need.	can therefore demonstrate a 7.80-year housing land supply.	
General Consultee (RBBC\Representor\0020)	Suggest that the level of “other affordable home ownership products” should be increased. This is because it is expected that the Planning White Paper is widely predicted to be rolling out a First Homes policy (subsidised market properties for key workers/ first time buyers) which might become an affordable housing tenure within the ‘other affordable home ownership products’.	Noted. The Government’s consultation on First Homes is currently only at consultation stage. The level of “other affordable home ownership products” is based on the 2019 Housing Needs Assessment which looked at the current definition/ requirements for affordable housing. The SPD is flexible enough to allow the final mix to be determined on a case-by-case basis, should First Homes become a requirement, then this will be built into the site-specific mix required.	N
General Consultee (RBBC\Representor\0020)	Paragraph 5.25: Disagree with the requirement for all rented accommodation to be provided as social rented accommodation opposed to affordable rent. This could impact upon the financial	Noted/ disagree. The need for social rented accommodation is to meet the latest assessment of affordable housing need in the borough. Paragraph 5.25 advises that where robust justification is provided, the Council may	N

	<p>viability of the scheme and could harm a Registered Provider's ability to borrow against a scheme, causing further viability concerns.</p> <p>Sought for this requirement to be removed and that instead the tenure mix should be negotiated on a case-by-case basis.</p>	<p>accept a proportion as affordable rent and that the specific tenure mix will be negotiated on a site-to-site basis.</p>	
<p>General Consultee (RBBC\Representor\0020)</p>	<p>RBBC state that the housing tenure mix in the draft SPD is based on Housing Needs Assessment (HNA) (2019). We wish to highlight an issue in that the document only takes into account development that will provide 30% affordable housing (as per Policy CS15 in the Core Strategy (2014)). In the DMP (2019), development on allocated greenfield urban extension sites should provide 35% affordable housing to be compliant with Policy DES6.</p>	<p>Noted.</p> <p>The Housing Needs Assessment makes a number of assumptions for the purpose of modelling future affordable housing provision, one of which is that 70% of net completions are of market housing and 30% affordable (in line with the general requirements for housing development in DMP Policy DES6).</p> <p>The tenure needs identified in the evidence paper are not purely a result of the modelling work but are also informed by discussion with the Council's Housing Strategy Team and Registered Providers. It is therefore not</p>	<p>N</p>

	Therefore, we feel that the assessment conducted in the HNA should have shown consideration of this and assessed whether this impacted upon the suggested tenure mix.	considered that any amendments are needed.	
General Consultee (RBBC\Representor\0020)	We wish to highlight the NPPF (2019) flexible definition of affordable housing, to ensure that the right balanced mix of tenures is delivered.	Noted. This definition of affordable housing has been taken into consideration in drafting the SPD.	N
General Consultee (RBBC\Representor\0020)	Paragraph 5.21: Whilst we acknowledge that some flexibility is accounted for, this is only in exceptional circumstances. We think that this is very restrictive and that greater flexibility should be incorporated into the policy to allow developers the opportunity to reflect the present and appropriate position in their development proposals. It	Disagree. It is not considered that further flexibility is needed in the SPD. DMP Policy DES6 is considered flexible to ensure that the size and tenure of affordable housing reflects the affordable housing needs in the borough at the time. The 2019 Housing Needs Assessment identifies the latest needs and this is reflected in the SPD.	N

	could be sought that housing evidence is provided by the applicant in order to justify their position for example at the pre-application or planning application stage.		
General Consultee (RBBC\Representor\0020)	Table 1: Affordable Housing Needs by Tenure and Property Size (Bedroom Numbers): The ability to meet the requirements in this table is driven by design, mix and clustering requirements. There is also a need to consider the tenure allocation from Registered Providers. The table should therefore be used as a guide and not a requirement.	Disagree. The needs identified were based on the 2019 Housing Needs Assessment which was informed by discussions with Registered Providers. As part of informal stakeholder engagement as part of the preparation of the Affordable Housing SPD, Registered Providers provided detailed comments re. their design mix and clustering requirements.	N
General Consultee (RBBC\Representor\0020)	Paragraph 5.31: Requirement for 2-bedroom accommodation to be provided as 4-person accommodation and 3-bedroom accommodation to be provided as 6-	Disagree. The needs are based upon discussion with the Council's Housing Strategy team regarding the need for accommodation in the borough. The need for 2-bedroom 4-person	N

	<p>person accommodation goes beyond the National Space Standards and there does not seem to be significant evidence to support this. Instead the need appears to be based on Paras 6.21-6.22 of the Housing Needs Assessment.</p>	<p>accommodation is due to the greatest need in the borough for 2-bedroom 4-person accommodation as they can accommodate a greater number of household types. The need for 3-bedroom 6-person accommodation rather than 3-bedroom 5-person accommodation is because it is difficult for families with 3 children to occupy 3-bedroom 5-person homes and as a result the need is often transferred to 4-bedroom need which results in a notable jump in costs.</p>	
<p>General Consultee (RBBC\Representor\0020)</p>	<p>Paragraph 5.36: This restricts rented accommodation to four storeys. This is a design issue and not one for housing policy. It should therefore be removed.</p>	<p>Disagree. This paragraph seeks to restrict affordable rented accommodation provided in a separate block to four storeys. This is based on discussion with Registered Providers in the borough who informed us that additional storeys would lead to the requirement for a lift and therefore increased service charges which would affect the cost of affordable rented housing.</p>	<p>N</p>

<p>General Consultee (RBBC\Representor\0020)</p>	<p>Paragraph 5.37: The requirement for clusters of affordable housing to not be more than 12 units on a large scheme should be made more flexible to address site specific issues and proposals, for example where flatted accommodation is proposed.</p>	<p>Noted. Paragraph 5.37 states that “clusters should not usually be more than 12 units in any one location”. This was informed by discussion with the Council’s Housing Strategy team and Registered Providers. The exact provision of affordable housing on a site will be dealt with on a site-by-site basis, and the s.106 agreement will detail specifically which units are to be provided as affordable housing.</p>	<p>N</p>
<p>General Consultee (RBBC\Representor\0020)</p>	<p>Paragraph 5.38: This paragraph mentions Building Regulation Part M requirements. It is unclear if this refers to Building Regulation Part M4 (3) or M4 (2). We would like RBBC to clarify this, as these requirements add an element of unknown cost for the developer. We would prefer the requirement to be Building Regulation Part M4 (2) and request</p>	<p>Noted. The Paragraph (and DMP Policy DES6) states the requirement for 5% of the affordable housing provided on site to be designed to meet building regulation requirements for wheelchair user dwellings which is defined as Building Regulation Part M(3).</p>	<p>N</p>

	that greater flexibility be incorporated into the requirement posed in order to reflect need at the time of submission of a planning application and site-specific considerations.		
Reigate & Banstead Place Delivery (RBBC\Representor\0021)	Paragraph 5.26: How will this be checked?	This will be agreed via a legal agreement.	N
Reigate & Banstead Place Delivery (RBBC\Representor\0021)	Question the need for two-bedroom properties to be 2-bedroom 4-person accommodation and three-bedroom properties to be 3-bedroom 6-person accommodation.	Noted. This need was identified in the Housing Needs Assessment by Icenl following discussions with the Council's Housing Strategy Team. The need for 2-bedroom 4-person accommodation is due to the greatest need in the borough for 2-bedroom 4-person accommodation as they can accommodate a greater number of household types. The need for 3-bedroom 6-person accommodation rather than 3-bedroom 5-person accommodation is because it is difficult	N

		for families with 3 children to occupy 3-bedroom 5-person homes and as a result the need is often transferred to 4 bedroom need which results in a notable jump in costs.	
Reigate & Banstead Housing Strategy (RBBC\Representor\0016)	Paragraph 5.31: To reflect the needs of the borough, would recommend that the wording should be amended to allow for a proportion of three-bedroom accommodation to be provided as 3 bedroom 6 person accommodation rather than requiring all three-bedroom accommodation to be provided as 3 bedroom 6 person accommodation. This will give more flexibility to reflect the variation in costs highlighted in the paragraph below this paragraph.	Noted. This has been amended accordingly.	Y
Reigate & Banstead Housing Strategy (RBBC\Representor\0016)	Paragraphs 6.11-6.13: This methodology provides clarity as to the requirement for off-site contributions. Could we strengthen	Noted. It is not possible for the Council to recommend a list of “approved” viability experts. However, Paragraph 6.9 does require the	Y

	<p>this mechanism further by requiring developers to use one of our recommended viability experts? Could we also have a list of “approved” viability experts that must be used to ensure some level of impartiality? And/ or can we reserve the right to have our own “independent” appraisals undertaken at the expense of the developer? I am just concerned that currently the developer can chose their own viability expert, which risks leaving us vulnerable to many “unviable” or low value outcomes.</p>	<p>developer to pay for the cost of external assessment of the appraisals submitted. The wording in this paragraph has been amended to state that where deemed necessary the cost of external assessment may include a full detailed viability assessment.</p>	
<p>Reigate & Banstead Housing Strategy (RBBC\Representor\0016)</p>	<p>Affordable Housing Cascade: Does reducing the number of affordable homes have a greater impact on viability than varying the tenure?</p>	<p>Yes. In general reducing the number of affordable homes would have a greater impact on viability than varying tenure, the affordable housing cascade has therefore been amended.</p>	

General Consultee (Infrastructure provider) (RBBC\Representor\0022)	No specific comments made.	Noted.	N
Environment Agency (RBBC\Representor\0015)	No specific comments made.	Noted.	N
Highways England (RBBC\Representor\0011)	No specific comments made.	Noted.	N
Tandridge District Council (RBBC\Representor\0012)	No specific comments made.	Noted.	N
Historic England (RBBC\Representor\0014)	No specific comments made.	Noted.	N
Gatwick Airport Safeguarding (RBBC\Representor\0008)	No specific comments made.	Noted.	N
National Grid (RBBC\Representor\0009)	No specific comments made.	Noted.	N
Transport for London (RBBC\Representor\0001)	No specific comments made.	Noted.	N
Natural England (RBBC\Representor\0017)	No specific comments made.	Noted.	N

Appendix 2: Any other matters

Various textual, grammatical and factual updates were suggested, these have been updated where appropriate.

Appendix 3: Individuals and organisations consulted on the draft Affordable Housing SPD under Regulations 12 and 13

Specific Consultees	
Homes England	Eircom UK Ltd
Sutton and East Surrey Water	Energis Communications Ltd
Scotia Gas Network	EU Networks Fiber UK Limited
National Grid	FibreSpeed Limited
CLH Pipeline System Ltd	Fibrewave Networks
Surrey Downs CCG	FLAG Atlantic UK Limited
Southern Gas Network	Fujitsu Services Limited
British Gas	Full Fibre Limited
Southern Electric	G. Network Communications Limited
Thames Water Utilities Ltd	Gamma Telecom Holdings Ltd
Vodafone	Gigaclear Plc
O2	Glide Business Limited (formerly WarwickNet Limited)
UK Power Network	Hutchison 3G UK Limited
Government Pipeline & Storage System	Hyperoptic Ltd
euNetworks Fiber UK Ltd	In Focus Public Networks Ltd
Gas Transportation Company	InTechnology Smart Cities Limited (formerly InTechnology WiFi Limited)
Three	Integrated Digital Services Limited

Southern Water	Internet Central Ltd
Thames Water	Internet Connections Limited
Crawley CCG	GTT Communications
British Telecom	ITS Technology Group Limited
Thames Water	IX Wireless Limited
Network Rail	KCOM Group Plc
Environment Agency	Lancaster University Network Services Limited
Crawley Borough Council	Lightning Fibre Limited
London Borough of Croydon	Lothian Broadband Networks Limited
Epsom & Ewell Borough Council	Communications Infrastructure Networks Limited
Mole Valley District Council	MLL Telecom Ltd
London Borough of Sutton	MS3 Networks Ltd
Tandridge District Council	My Fibre Limited
Surrey County Council Minerals & Waste Planning	NATS (En Route) PLC
Surrey County Council Planning Consultation	Neos Networks Ltd
Greater London Authority	NextGenAccess Ltd.
Coast 2 Capital	NWP Street Ltd
Historic England	Ontix Limited
Marine Management Organisation	Orange Personal Communication Services Ltd
Natural England	Open Fibre Networks Limited (formerly Independent Next Generation Networks Limited)
Highways England	Open Network Systems Limited

Natural England Sussex & Surrey Team	Quickline Communications Limited
Historic England South East	PCCW Global Networks (UK) Plc
Mayor of London	Ranston Farm Partnership
Local Plans South - NHS Property Services Ltd	Aqua Comms
Sussex and Surrey Police	Severn Trent Retail Services Limited
Transport for London	Solway Communications Limited
The Coal Authority	Sky Telecommunications Services Limited
Nutfield Parish Council	Sky UK Limited
Burstow Parish Council	Sprintlink UK Ltd
Salfords & Sidlow Parish Council	Spyder Facilities Limited
Betchworth Parish Council	SSE Telecommunications Limited
Chaldon Parish Council	Subtopia Limited
Charlwood Parish Council	TalkTalk Communications Limited
Headley Parish Council	Tata Communications (UK) Limited
Newdigate Parish Council	Telewest Limited
Bletchingley Parish Council	Telefonica UK Limited
Horley Town Council	TeliaSonera International Carrier UK Limited
Leigh Parish Council	The Wireless Infrastructure Company Limited
Outwood Parish Council	The Wireless Asset Company Limited
Buckland Parish Council	Telecommunications Wireless and Infrastructure Services Limited
National Grid (Avison Young)	Telensa Ltd.
Airband Community Internet Limited	Telent Technology Services Limited

Airwave Solutions Limited	Thus plc
Affiniti Integrated Solutions Limited	TIBUS (trading as The Internet Business Limited)
Arqiva Communications Ltd	Timico Partner Services Limited
Arqiva Services Limited	Tiscali UK Limited
Arqiva Limited	toob Limited
AT&T Global Network Services (UK) B.V.	Truespeed Communications Ltd.
Atlas Communications NI Limited	UK Broadband Limited
(aq) Limited	Ulstercom Ltd
Atlas Tower Group Limited	Urban Innovation Company (UIC) Limited, (formerly Euro Payphone Ltd)
B4B Networks Ltd	Verizon UK Ltd
Bolt Pro Tem Limited	Virgin Media Limited
Boundless Networks Ltd	Vodafone Limited
Box Broadband Limited	Voneus Limited
Britannia Towers II Ltd	Interoute Communications Limited
British Telecommunications plc	WHP Telecoms Limited
Broadband for the Rural North Limited	Wifinity Limited
Broadway Partners Limited	Wightfibre Limited
Call Flow Solutions Limited	Wildcard UK Limited
Cambridge Fibre Networks Limited	WPD Telecoms Limited (formerly Surf Telecoms Limited)
Central North Sea Fibre Telecommunications Company Limited	Zayo Group UK Limited
CenturyLink Communications UK Limited	Zzoomm PLC

CityLink Telecommunications Limited	A.P.T.
CityFibre Metro Networks Limited	AERIAL SITES PLC
Cogent Communications UK Ltd	Cellular Design Services
COLT Technology Services	Harlequin Group Ltd
Community Fibre Limited	IPM Communications PLC
Concept Solutions People Ltd	Mobile Broadband Network Limited
Cornerstone Telecommunications Infrastructure Limited	Mono Consultants
County Broadband Limited	Waldon Telecom Ltd.
EE Limited	Sitec Infrastructure Services Ltd
General Consultees	
Residents, businesses, registered providers and developers on the Council's Planning Policy Consultation Contacts database	

