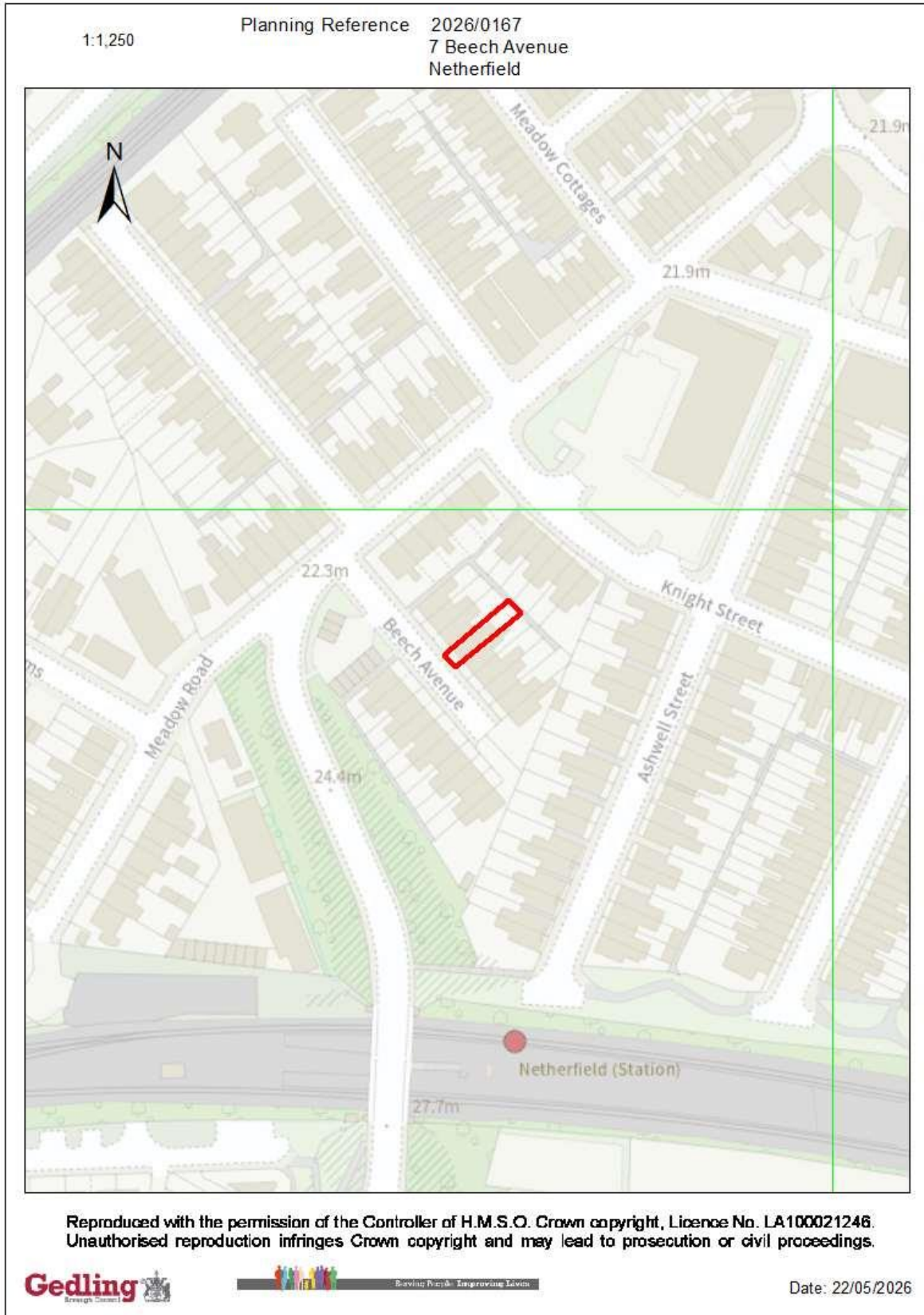




Planning Report for 2026/0167



Report to Planning Committee

Application Number: 2026/0167

Location: 7 Beech Avenue, Netherfield, Nottinghamshire

Proposal: Full planning Permission is sought for the change of use of the property from a 6 bedroom HMO (C4 use) to 7 bedroom HMO (Sui Generis) for up to 7 occupiers

Applicant: Mr Seb Wright

Agent: Wilson Architects Ltd

Case Officer: Alison Jackson

This application has been referred to Planning Committee following consideration at the Planning Delegation Panel to fully assess the impact of the proposal on parking in the area, highway safety, amenity and housing mix.

1 Site Description

1.0 7 Beech Avenue, Netherfield is a three-storey terraced property. There is a rear garden area to the property. The property does not benefit from off street parking. The site is situated in close proximity to the Netherfield designated Local Centre. Neighbouring properties are predominantly residential. The site is located within flood zone 2.

2 Relevant Planning History

2.1 The property has previously been extended with a rear single storey extension and a loft conversion. These works constituted permitted development.

2.2 The property currently operates as a six bedroom House in Multiple Occupation (HMO) which did not require planning permission.

3 Proposed Development

3.1 Planning permission is sought for a change of use from 6-bedroom HMO (C4 use) to a 7-bedroom HMO for up to 7 occupiers which falls within a sui generis use. The rooms are all proposed to be en-suite. Some of the rooms have tea-making facilities and a sink but none have their own individual cooking facilities. A shared kitchen/dining area for the whole house is also proposed.

4 Consultations

- 4.1 Nottinghamshire County Council (Highway Authority) – stress that the proposal may cause inconvenience to the existing residents and their visitors who also have a current demand for parking in the area. However, having taken the road safety into account, the Highways Authority do not wish to raise any objection to the proposal.
- 4.2 Gedling Borough Council (GBC) Environmental Health (Noise) – no objections.
- 4.3 Environmental Health (Licensing) – No objections. The bedrooms meet the required space standards, all rooms have be-suite bathrooms and the kitchen / living areas meet the kitchen amenity standards.
- 4.4 Police – No objection
- 4.5 A site notice was displayed and neighbour notification letters posted. As a result of the consultation no letters of objection have been received.

5 Relevant Planning Policy

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that ‘if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise’.
- 5.2 The National Planning Policy Framework 2024 (NPPF) and the additional guidance provided in the National Planning Practice Guidance (NPPG) are both material considerations in the determination of this application. The NPPF sets out the national objectives for delivering sustainable development. Sections 2 (Achieving Sustainable Development), 4 (Decision Making), 5 (Delivering a sufficient supply of homes), 9 (Promoting sustainable transport) and 12 (Achieving well-designed places) are particularly relevant.

The following policies are relevant to the application:

- 5.3 Greater Nottingham Aligned Core Strategy Part 1 Local Plan

Policy A: Presumption in Favour of Sustainable Development – a positive approach will be taken when considering development proposals

Policy 1: Climate Change – all development will be expected to mitigate against and adapt to climate change including with respect to flood risk.

Policy 8: Housing Size, Mix and Choice – sets out the objectives for delivering new housing.

Policy 10: Design and Enhancing Local Identity – sets out the criteria that development will need to meet with respect to design considerations.

- 5.4 Local Planning Document (Part 2 Local Plan)

The Local Planning Authority adopted the Local Planning Document (LPD) on the 18th July 2018. The relevant policies to the determination of this application are as follows:

LPD 3 – Managing Flood Risk states planning permission will be granted for development in areas at risk of flooding provided that the development does not increase the risk of flooding on the site or elsewhere.

LPD 32 - Amenity states “Planning permission will be granted for development proposals that do not have a significant adverse impact on the amenity of nearby residents or occupiers, taking into account potential mitigation measures”.

LPD 37 – Housing Type, Size and Tenure states “Planning permission will be granted for residential development that provides for an appropriate mix of housing, subject to housing need and demographic context within the local area.”

LPD 57 – Parking Standards states “a) Planning permission for residential development will be granted where the development proposal meets the requirement for parking provision set out in Appendix D, or otherwise agreed by the local planning authority.” Please note that this has now been superseded by the Council’s Parking Provision SPD (February 2022).

LPD 61 – Highway Safety states “Planning permission will be granted for development proposals which do not have a detrimental effect on highway safety, patterns of movement and the access needs of all people.”

5.5 Other

Parking Provision for Residential and Non Residential Developments: Supplementary Planning Document (SPD) February 2022– sets out the car parking requirements for residential development.

6 Appraisal

Principle of the Proposed Use

- 6.1 The site is located within an urban area where the principle of further development is considered acceptable, subject to complying with other relevant criteria.

Impact of the proposed Use on Residential Amenity

- 6.2 It is considered that the use of the property as a 7-bedroom HMO will result in no undue impact onto the amenity of neighbouring properties. The level of activity associated with the proposed 7-bedroom HMO is not considered to be materially greater than the existing lawful 6-bedroom HMO use.
- 6.3 It is also acknowledged that the property can be used as a 6-bed HMO without requiring planning permission which is the case here as the property already operates as a six bedroom HMO. It is therefore considered that the creation of

one additional bedroom in order to create 7 bedrooms in total will result in no significant additional impact on the amenity of neighbouring properties.

- 6.4 The use of the property as proposed, whilst accepting would be different from a conventional 'family home', is supported through Policies ACS8 and LPD37 which states that residential development should contribute to a mix of housing tenures, types and sizes to create sustainable, inclusive and mixed communities. This proposed development would provide accessible accommodation for tenants in a very sustainable location, close to public transport links and local amenities and would provide a mixed community.
- 6.5 It is not considered that the proposal would lead to the area being overpopulated as a result of the proposed use of the premises as an HMO, particularly given that the premises can already be used lawfully as a 6-person HMO.
- 6.6 The area of Netherfield currently offers a mixture of housing types, which is welcomed in terms of planning policies, providing inclusive communities. Planning policy does not prevent the development of properties for HMOs providing all other material considerations are assessed.
- 6.7 The Council's Environmental Health team (Licencing) has been consulted on the application and has advised that they raise no objections to the proposed use in terms of space standards and facilities provided. I see no reason to depart from this professional advice and I am satisfied that the internal layout and facilities proposed would provide an acceptable standard of accommodation for future occupiers and would not give rise to unacceptable impacts on the amenity of neighbouring residents. In addition to planning permission, a licence would need to be sought from the Council's Licencing team to use the property as an HMO. This would further assess matters such as space standards and facilities being provided within the property.
- 6.8 The Council's Environmental Health team (Noise) has also raised no objections to the application. Again, I see no reason to disagree with the professional advice of the Environmental Health Officer.
- 6.9 Whilst the Highway Authority has raised no objection to the proposal on the grounds of highway safety (discussed in the next section of this report below), however, they do note that any additional demand for on street parking may result in inconvenience to neighbouring residents. The site already has a lawful development certificate in place for a 6-bedroom HMO and this proposal seeks to increase the number of bedrooms and residents at the property by 1. It is not considered that this increase of 1 additional person at the site (who may or may not have a private car) will cause unacceptable, additional issues of inconvenience or noise or disturbance through potentially requiring an additional on-street car parking space. Parking standards are discussed in further detail under the "Highway Safety" section of this report.
- 6.10 It is therefore considered that the proposal accords with the aims of policy 8 of the Aligned Core Strategy and policy LPD32 and policy LPD37 of the Local Planning Document 2018.

Highway Safety

- 6.11 The Highway Authority has raised no objection to the proposal and state that the proposed use of the premises as an HMO would result in no undue highway safety issues. They do note that demand for on street parking may result in inconvenience to neighbouring residents (and this is discussed earlier in this report) but that this is not a highway safety issue.
- 6.12 The proposal is for a 7-bedroom HMO which does fall within a sui generis use class but is considered to be residential in nature. However, the Council's Parking Standards SPD is silent on HMOs (which is still considered to be a residential use and not a commercial use) and therefore each case would need to be considered on its own individual merits. The proposal does not provide for any off-street car parking spaces. Whilst the SPD does not set out parking standards for HMOs, it does indicate that reduced parking provision may be acceptable where justified.

Paragraph 4.12 of the SPD states that;-

"The expectation is that parking standards will be met, however if the development is served by one or more regular public transport service, this may be a material consideration justifying a reduced parking provision requirement, especially if a site is located within; or close to a central area."

- 6.13 Taking the above into account, it is considered that given the proximity of the site to the Netherfield designated Local Centre where there are a number of public car parks together with a number of amenities, shops and other facilities, together with the fact that the site is situated close to a public transport routes, the requirement for off road car parking at the site is not required in this instance and the requirement for parking provision has been appropriately assessed in accordance with the SPD.
- 6.14 On street parking in this area is not restricted to individual properties, it is a case where anyone can park on the street. There is also evidence that car ownership in Netherfield is low when compared to Nottinghamshire and demand for car parking is therefore reduced. The Office for National Statistics Census of 2021 shows that 32.9% of households in Netherfield do not have a car (compared to 18.3% for Nottinghamshire) 46.8% have 1 car (41.8% for Nottinghamshire) 16.4% have 2 cars (30% for Nottinghamshire) and 3.9% have 3 or more cars (9.9% for Nottinghamshire).
- 6.15 Moreover, the number of bedrooms / residents at the site is only increasing by 1 above how the site currently operates as a six bedroom HMO.
- 6.16 It is therefore considered that the proposal accords with policy LPD61 in respect to highway safety and LPD57 and the SPD in regard to the need for off street parking provision.

Flood Risk Issues

- 6.17 The site is located within Environment Agency Flood Zone 2. As the proposal relates to a change of use of an existing residential property there is no

requirement under planning policy to undertake a flooding sequential test or a flooding exception test. The proposal, however, has to be assessed as to whether or not it results in any flood risk issues to the occupants of the premises.

- 6.18 The proposal falls to be assessed against Environment Agency Flood Risk Standing Advice. The applicant has submitted a Flood Risk Statement stating that they will comply with this Standing Advice in that the floor levels of the property remain unchanged, hard flooring is proposed and all electrical installation will be set 300mm above floor level.
- 6.19 As the proposal is for the change of use of the premises with no extension of the footprint of the building, there will be no increased flood risk to the area in general.
- 6.20 It is therefore considered that the proposal accords with the aims of the National Planning Policy Framework 2024, policy 1 of the Aligned Core Strategy 2014 and policy LPD3 of the Local Planning Document 2018.

Other

- 6.21 It is noted there are other planning applications which are currently being assessed by Gedling Borough Council for the conversion of properties within the Netherfield area to HMO accommodation. Each proposal and site must be considered on its own merits and precedents are therefore not set, should one site be granted planning permission.
- 6.22 It is also noted that planning permission and lawful development certificates have been issued for changes of use of other properties to HMOs in the Netherfield area. Again these applications are assessed on their own merits. The fact that there are other HMOs in the area does not prevent the submission of applications for the change of use of other properties to operate as HMOs and therefore this application together with any other applications for HMOs will be assessed on their own merits.
- 6.23 The Local Planning Authority are obligated to assess all applications submitted and determine the applications accordingly taking into account all material planning considerations.
- 6.24 Standard Police Secured by Design comments should be attached as an informative to the grant of any planning permission.
- 6.25 The proposal would result in an increase of less than 25 square metres in floor space. As a result the proposal would be exempt from the requirement for a 10% Biodiversity Net Gain.

7 Local Government Reorganisation Implications

- 7.1 It is not considered that this planning application decision will be affected by Local Government Reorganisation. The applicant is a private company that is not connected to the Council. The planning permission runs with the land and recommended condition 1 would allow a developer three years to commence

development. If planning permission is granted, then any pre-commencement conditions would require discharging by the Local Planning Authority under whichever Council is in place at the time.

8 Equalities Implications

8.1 There are no known equalities implications relating to this application

9 Carbon Reduction/Environmental Sustainability Implications

9.1 The proposal includes the provision of a bike store therefore reducing carbon emissions.

10 Conclusion

10.1 In the planning balance, there may be some limited impacts from the proposal such as a modest intensification of the site and incremental parking demand. However, these are not significant and are not considered to give rise to unacceptable highway safety or amenity impacts, particularly having regard to the lawful status of the property as a 6-bed HMO. These limited impacts are also outweighed by the benefits of providing additional residential accommodation in a sustainable location. As such, the proposal is considered acceptable.

10.2 The proposed development is consistent with national and local planning policies. The proposal will result in no undue impact on the residential amenity of occupiers of neighbouring properties, there are no highway safety or parking issues arising and space standards within the development are considered to be acceptable to ensure adequate amenity for potential future occupiers. The development is also acceptable in respect to flood risk issues. It is considered that the proposal is appropriate for its context and is in accordance with the NPPF 2024 (Sections 2, 5, 12 and 14), Policies A, 1, 8 and 10 of the GBCAS (2014) and Policies LPD 3, 32, 37 and 61 of the LPD.

11 Recommendation: GRANT PLANNING PERMISSION subject to the following conditions:

Conditions

- 1 The development must be begun not later than three years beginning with the date of this permission.
- 2 The development shall be undertaken in accordance with the details as set out within the application form received on the 12th March 2026, the Planning Statement received on the 12th March 2026 and the plans received on the 12th March 2026, drawing numbers: 24,089-P-001, 24,089-P-210, 24,089-P-020 and 24,089-P-101.

Reasons

- 1 In order to comply with Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).
- 2 For the avoidance of doubt.

Reasons for Decision

The proposed development is consistent with national and local planning policies. The proposal will result in no undue impact on the residential amenity of future occupiers of the site or of occupiers of neighbouring properties, there are no highway safety or parking issues arising. The development is also acceptable in respect to flood risk issues. It is considered that the proposal is appropriate for its context and is in accordance with the NPPF 2024 (Sections 2, 5, 12 and 14), Policies A, 1, 8 and 10 of the GBCAS (2014) and Policies LPD 3, 32, 37 and 61 of the LPD.

Notes to Applicant

The developer is advised to ensure compliance with the relevant Building Regulations.

The applicant is advised that all planning permissions granted on or after 16th October 2015 may be subject to the Community Infrastructure Levy (CIL). Full details of CIL are available on the Council's website. The proposed development has been assessed and it is the Council's view that CIL is not payable on the development hereby approved as the development type proposed is zero rated in this location.

Planning Statement - The Borough Council has worked positively and proactively with the applicant in accordance with paragraph 39 of the National Planning Policy Framework.

It is noted that there is no reference to crime prevention or security measures to be implemented in the redevelopment of this property in the documentation provided. There is reference to the responsibility of the tenants for security, however, this is limited to their actions.

Many of the HMOs visited by the police have poor standards of security which render the occupants at an increased risk of becoming victims of crime. As the occupants of HMOs do not own the property it is often difficult for them to adopt any crime reduction recommendations made by the police after a crime has taken place. Statistically, the likelihood of being a repeat victim of house burglary in England & Wales increases exponentially unless crime reduction measures are adopted (Tseloni et al., 2018).

'Secured by Design' (SbD) is a police initiative to guide and encourage those engaged within the specification, design and build of new homes, and those undertaking major or minor property refurbishment, to adopt crime prevention measures. 'Secured by Design' is proven to reduce the opportunity for crime and the fear of crime, creating safer, more secure and sustainable environments. Secured by Design is owned by the UK Police Service and is supported by the Home Office,

Building Control Departments in England (Part Q Security – Dwellings), Scotland (Building Standard 4.13) and Wales (Part Q Security – Dwellings) all reference SBD.

Secured by Design (SBD) is a place-based approach to crime reduction that brings together standards of physical security with the broader principles of Crime Prevention Through Environmental Design (CPTED) to set minimum requirements that enable properties to be awarded SBD status. The results of several studies have shown that housing design plays a key role in influencing offender decision-making, the risk of surveillance and standards of physical security being primary deterrents (Armitage & Tompson, 2022).

https://www.securedbydesign.com/images/design-guides/residential_guide_2025_270225_final.pdf

Secured by Design would advise the following measures for this development:

Access control and door entry systems

Smaller developments containing 25 or less, apartments, bedsits or bedrooms should have a visitor door entry system and access control system. The technology by which the visitor door entry system operates is a matter of developer choice, however it should provide the following attributes:

- Access to the building via the use of a security encrypted electronic key (e.g. fob, card, mobile device).
- Vandal resistant external door entry panel with a linked camera.
- Ability to release the primary entrance door set from the dwelling or bedroom (in the case of student accommodation or House in Multiple Occupation).
- Live audio and visual communication between the occupant and the visitor.
- Ability to recover from power failure instantaneously.
- Unrestricted egress from the building in the event of an emergency or power failure.
- Control equipment to be located in a secure area within the premises covered by the CCTV system and contained in a lockable steel cabinet to LPS 1175 Security Rating 1 or STS 202 Burglary Rating 1.

Door sets

All door sets allowing direct access into to the home, dedicated private flat or apartment entrance door sets, communal door sets shall be certificated to one of the following standards:

- PAS 24:2016 (Note 23.4b), or
- PAS 24:2022 (Note 23.4b), or
- STS 201 Issue 12:2020 (Note 23.4c), or
- LPS 1175 Issue 7.2:2014 Security Rating 2+ (Note 23.4d), or
- LPS 1175 Issue 8:2018 Security Rating A3+, or

- STS 202 Issue 10:2021 Burglary Rating 2 (Note 23.4d), or
- LPS 2081 Issue 1.1:2016 Security Rating B (Notes 23.4d and 23.4e), or
- STS 222 Issue 1:2021

Windows

All easily accessible windows (including easily accessible roof lights and roof windows) shall be certificated to one of the following standards:

- PAS 24:2016 (Note 24.2b), or
- PAS 24:2022, (Note 24.2b), or
- STS 204 Issue 6:2016 (Note 24.2c), or
- LPS 1175 Issue 7.2:2014 Security Rating 1 (Note 24.2d), or
- LPS 1175 Issue 8:2018 Security Rating 1/A1, or
- STS 202 Issue 10:2021 Burglary Rating 1, or
- LPS 2081 Issue 1.1:2016 Security Rating A, or
- STS 222 Issue 1:2021

Note: Easily accessible is defined within Approved Document Q Appendix A as:

- A window or doorset, any part of which is within 2 metres vertically of an accessible level surface such as a ground or basement level, or an access balcony, or
- A window within 2 metres vertically of a flat roof or sloping roof (with a pitch of less than 30°) that is within 3.5 metres of ground level.

External Lighting

Where possible the lighting requirements within BS 5489-1:2020 should be applied. Developers are advised that there is further guidance available from the Chartered Institute of Building Services Engineers (CIBSE) and the Society of Light and Lighting (SLL).

Lighting is required to illuminate all elevations containing a door set, car parking and garage areas and footpaths leading to dwellings and blocks of flats. Bollard lighting is not appropriate as it does not project sufficient light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime.

Overall Lighting uniformity (U_o) - levels of 0.4 or 40% - are recommended where possible to ensure that lighting installations do not create dark patches next to lighter patches where the human eye has difficulty in adjusting quickly enough to see that it is safe to proceed along any route. If high levels of uniformity are neither achievable nor appropriate for technical or locally applying environmental reasons, the highest levels of uniformity possible should be achieved.

External public lighting must be switched using a photo electric cell (dusk to dawn) with a manual override or via a Central Management System (CMS) for large scale developments. If LED light sources are used, then shorter burning hours can be programmed as no warmup time is required for the lamp.

Secured by Design has not specified PIR activated security lighting for several years following advice from the ILP and police concern regarding the increase in the fear of

crime (particularly amongst the elderly) due to repeated PIR lamp activations. Research has proven that a constant level of illumination is more effective at controlling the night environment.

24-hour lighting (switched using a daylight sensor formally called photoelectric cells) to communal parts of blocks of flats will be required. It is acceptable if this is dimmed during hours of low occupation to save energy. This will normally include the communal entrance hall, lobbies, landings, corridors and stairwells and

underground garaging facilities and all entrance/exit points. Technology exists in respect of energy efficient light dimming systems and other means of ensuring that security lighting is intelligently provided in the right quantities and only at the right time.

CCTV

It is recommended that CCTV is installed as part of this development. For the purposes of this guide, the term Closed Circuit Television (CCTV) is used to describe all video surveillance systems capable of recording moving images or sound, from traditional CCTV systems with on-site or remote recording facilities to video doorbells that begin recording only when a doorbell is activated.

The purpose of a CCTV system and the results desired from it must be carefully detailed in the Operational Requirement so that an appropriate installation is identified and can be agreed upon with a prospective installer. Attendant problems that could detract from the success of a CCTV system should be identified and a solution to them sought at this early planning stage.

Although a CCTV system cannot address all aspects of security, it can form an invaluable element within a comprehensive security strategy as long as the specification and installation meet the users Operational Requirement. CCTV is not a universal solution to security problems, but it does form part of an overall security plan. It can help deter crime and criminal behaviour, assist with the identification of offenders, promote personal safety, and provide reassurance for residents and visitors. Even the smallest development will benefit from the installation of a good quality CCTV system, which does not need to be expensive.

Images of people are covered by the General Data Protection Regulation (GDPR), and so is information about people which is derived from images – for example, vehicle registration numbers. Most uses of CCTV will be covered by the Data Protection Act 2018, which is the UK's implementation of the GDPR, regardless of the number of cameras or how sophisticated the equipment is.

Specifiers are reminded that there will be a requirement for a data controller to ensure compliance with the GDPR. The data controller must ensure that all CCTV images that can be used to identify individuals are used, stored, and disclosed in line with the GDPR principles.

It is important that signs are displayed explaining that CCTV is in operation.

- Have CCTV cameras contained in vandal resistant housings with the facility for ceiling or wall mounting.

- Record images in colour HD quality.
- Not be affected by concentrated white light sources directed at the camera, such as car head lights and street lighting.
- Have a lockable steel cabinet for 'on-site' recording equipment or other hard drive units to one of the following standards:
 - LPS 1175 Security Rating 1 (A1), or
 - STS 202 Burglary Rating 1, or
 - SS314
- Identify each camera's location and record this information along with time and date stamping.
- Provide suitable methods of export and incorporate the required software to view the exported footage.
- Negatively impacted upon by lighting and landscape proposals
- Whether there is consideration for inclusion of comprehensive Operational use and Requirements Table
- Also, it is worth mentioning that the most important aspect of utilising CCTV is the quality of the system and its imagery.

CCTV cameras associated with visitor door entry systems covering communal entrances and internal lobby areas should be installed and be capable of providing images of persons that are clearly identifiable on smaller devices such as smart phones.

Ideally, CCTV systems should be monitored live 24/7 giving the ability to react to a situation as it occurs. However, this is not a requirement of Secured by Design for residential developments. Most CCTV systems are designed for recording images and for the post event investigation only, in which case nobody is required to monitor the activities live. Police recommend that images are stored for a minimum of 31 days.

Early discussions with an independent CCTV expert and potential installers can resolve a number of matters, including:

- monitoring and recording requirements.
- activation in association with the intruder alarm.
- requirements for observation, facial recognition/identification and automatic number plate recognition (ANPR) .
- areas to be monitored and field of view.
- activities to be monitored.
- the use of recorded images.
- maintenance of equipment and the management of recording.
- subsequent on-going training of operatives.
- Further advice, including the ICO CCTV Code of Practice is available at: www.ico.org.uk

Bicycle Security

Bicycle storage solutions should be constructed to the following 'Secured by Design' standards.

Bicycle parking will comprise of bicycle stands, anchor points, single and two-tier rack systems and dedicated lockers. The bicycle stands and rack systems, single or two tier, should be certified to one of the following standards:

- Sold Secure – SS104 Security Rating Bronze, or
 - Element (Wednesbury) – STS 501 Security Rating TR1, or
 - Element (Wednesbury) – STS 503 Security Rating TR1, or
 - Warringtonfire – STS 205 Issue 6:2021 Security Rating BR1, or
 - Warringtonfire – STS 225 Issue 1:2021 Security Rating BR1 (S), or
 - Loss Prevention Certification Board LPS1175 Issue 8:2018 Security Rating A (A1)
- Bicycle parking facilities should be limited to the storing of no more than seventy bikes; if larger numbers need to be stored at the same location, the facilities should be separated into discreet units and be subject to extra mitigating security measures as agreed with the Nottinghamshire Designing Out Crime Officer.

It is possible that a further house of multiple occupancy while resulting in the re-use of a vacant building would not necessarily achieve a mixed and balanced community if such properties continue to be converted in the same localised area, and the residents of them remain transient and lack ownership or desire to become embedded in that community.

It is requested that the Secured by Design standard is achieved and formally accredited.