CRIME PREVENTION SERVICES

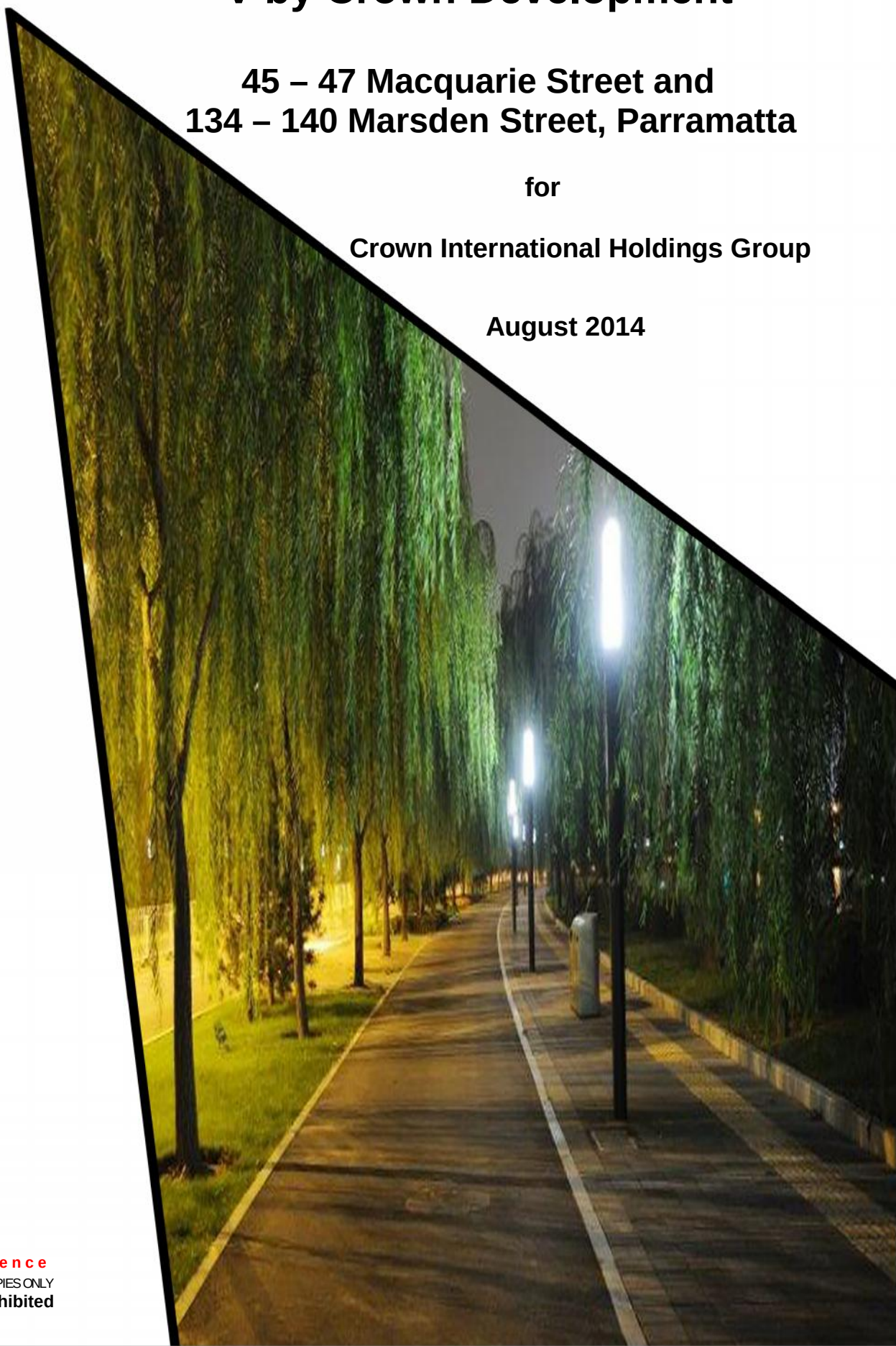
V by Crown Development

45 – 47 Macquarie Street and
134 – 140 Marsden Street, Parramatta

for

Crown International Holdings Group

August 2014



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A EXECUTIVE SUMMARY

1 The Development and Crime Risk (Security) Issues

On the 28 October 2011, the NSW Minister for Planning granted approval of the Crown International Holdings Group (Crown Holdings) V by Crown development as a "major project" (MP 09_0167) under the Part 3A provisions of the Environmental Planning and Assessment (EPA) Act, 1979, conditional on adopting the (Planning) Director General's requirements as Schedule 2 Parts A to F of the approval.

In 2012, Crown Holdings revised the development's parameters and submitted an amended proposal under Section 75W of the EPA Act. Harris Crime Prevention Services (Harris) reviewed the proposal to assess whether and how changes to the development's design might impact on the security design and management issues canvassed in the original Harris March 2010 Report submitted as part of the Part 3A application by Crown Holdings.

While this current report re-visits our 2012 report, it is important to refer to, and/or re-state, contextual, design, management and compliance matters, which remain relevant to both the MOD3 proposals and to the overall project. This report is therefore not an abridged document. It:

(a) canvasses design changes to be submitted in Crown's Section 75W MOD3 application, with respect to Crime Prevention Through Environmental Design (CPTED) impacts;
(b) re-affirms the assessment and conclusions of our 2010 and 2012 reports;
(c) reinforces the importance of sound operational security management, applying Crime Prevention Through Environmental Management (CPTEM) principles.

The main security (crime) risks for the overall development remain as:

(i) unauthorised access to the any of the precincts within the development's footprint;
(ii) anti-social and/or criminal behaviour within and immediately surrounding, that footprint;
(iii) resultant damage to, or destruction of, the development's property or equipment;
(iv) harm or injury to persons associated with the development's mixed-use occupancy.

1.1 The Report's Objectives

The report considers the above risks in the context of changes proposed in the Section 75W MOD3 application. Commentary, conclusions and/or recommendations are addressed under our security objective headings.

As indicated in our 2012 report, there are two interrelated elements to reducing and/or preventing crime – security design and security management. Crime Prevention Through Environmental Design (CPTED) and Crime Prevention Through Environmental Management (CPTEM) are the theoretical and practical underpinnings of both elements.

From the CPTED and CPTEM frameworks, there are four security (crime prevention) objectives; context, design, management and compliance, headed as:

Security Objective 1 Contextual Impact and Minimisation of Crime Risks
Security Objective 2 Specific Security Design to Support Crime Prevention Outcomes
Security Objective 3 Post-Construction (Occupancy) Security Management
Security Objective 4 Local and State (Planning) Instrument Compliance

In essence, this report reaches the same broad (positive) conclusions and/or recommendations for the Section 75W MOD3 amendments, as those contained in our Section 75W report of 2012.

Security Objective 2 considers specific design changes in the MOD3 application. Commentary and conclusions on those specifics indicate either: (i) no requirement for any security design or security management changes, or (ii) a requirement, in terms of planning instrument compliance (Security Objective 4) to consider design modification.

A summary of our conclusions follows.

1.1.1 Security Objective 1 Contextual Impact and Minimisation of Crime Risks

- assessing the development's connection with the surrounding environment in terms of anti-social behaviour, criminal activity and/or potential crime risks. (The development should positively contribute to the 'safe city' strategy of Parramatta City Council through sound design and post-construction (security) management).

Conclusions

The development complements positive neighbourhood 'safe place' pedestrian and vehicle activation – residential, passive recreational, commercial, heritage and retail – as part of a safer CBD strategy. Higher pedestrian activation volume and diversity will continue as the neighbourhoods demographic changes due to Parramatta's 'roll-out' of its CBD strategy. The development will connect appropriately with this strategy. The mixed use operations accord with other CBD interactivity, with pedestrian and vehicle movements to and from the site and its immediate surrounds, generating purposeful presence. The activity will add welcome interspatial flow to that part of the CBD.

From our review of the MOD3 drawings, there are no aspects of the development's design variations likely to cause, condone or promote anti-social or criminal behaviour in or around the local neighbourhood.

Rather, we are of the view that the overall design, including the MOD3 proposals are likely to promote a positive impact on community connectivity and cohesion, in line with Council's broader initiatives to reduce and prevent opportunistic anti-social behaviour and criminal activity throughout the CBD.

The revised proposal's overall design and operations are likely to promote positive pedestrian and vehicle activation in and around the development's footprint. In our view the revised Section 75W MOD3 proposal should not cause, condone or otherwise encourage, anti-social or criminal behaviour and/or constitute any increase in community crime or crime risks. Our contextual review and assessment confirms incorporation of CPTED principles aimed at projecting a 'welcoming and safe place' platform for the development's occupants, including contractors and visitors.

1.1.2 Security Objective 2 Specific Security Design to Support Crime Prevention Outcomes

- identifying new vulnerable aspects of the development's MOD3 application requiring specific *security design* input aimed at reducing and/or preventing opportunities to commit crime;

- affirming appropriate security design strategies already incorporated into the application and/or recommending possible changes to aspects of architecture and/or engineering, likely to enhance this security design objective.

Conclusions

We reaffirm that, where relevant, the overall design incorporates CPTED principles. Spatial zones and their controlled access are well defined, internal and external surveillance is maximised and the architecture reflects appropriate activity support and appropriate target hardening in critical locations.

From a crime prevention (security) perspective the Section 75W MOD3 drawings complement previous security design (CPTED) initiatives. Assessment and/or recommendations made under this Objective should enhance the overall security design of the development's footprint.

In our opinion, the Section 75W MOD3 drawings continue to reflect the development's 'welcoming and safe place' approach by incorporating, or intending to incorporate, CPTED principles into design amendments.

Reviewed drawings indicate application of architecture, engineering and technology to enhance the development's crime prevention design footprint, promoting appropriate solutions for retail, residential, commercial, heritage and basement precincts.

1.1.3 Security Objective 3 Post-Construction (Occupancy) Security Management

- outlining specific occupancy *security management* (CPTEM) strategies to enhance the development's sustainability and marketability as a welcoming and safe mixed-use 'destination'.

- ensuring that the development's operational reputation as a corporate contributor to the community, has a focus on minimising and/or preventing anti-social and/or criminal behaviour (a) within the site's footprint , while (b) advancing Council's CBD crime prevention initiatives.

Conclusions

It is essential that the on-going security reputation of the V by Crown development is served by reviewing and implementing a whole-of-site CPTEM strategy, to promote a 'zero-tolerance' regime with regard to anti-social and criminal behaviour.

Security Objective 3 is linked to compliance requirements (Security Objective 4). All operational stakeholders have on-going responsibility to identify and manage (reduce or prevent) risks associated with possible future site-based anti-social and criminal behaviour. The community (public) interest is a continuing one, in this case as part of the Council's broader CBD crime prevention initiatives.

In our view, the collective operational stakeholders should continue dialogue with Council, with privately engaged security contractors and with local police in preparing and implementing a CPTEM strategy; sharing ideas and resources for greater neighbourhood (security) impact.

While residential tenants will provide their own security resources and systems, this should happen in collaboration with the site's non-residential security arrangements, to ensure holistic site (security) awareness and operational systems/management integration.

We recommend the adoption of an up-dated whole-of-site CPTEM strategy to complement agreed security design solutions in Security Objective 2, (a) to enhance the overall marketability and reputation of the development as a 'welcoming and safe place', (b) to model 'best-practice' solutions by coordinating the management of on-going security risks, across all occupancy designations and (c) to comply with, and support, crime prevention policies and initiatives of Parramatta City Council.

1.1.4 Security Objective 4 Local and State (Planning) Instrument Compliance

- ensuring compliance with: (a) Parramatta City Council's City Centre Crime Prevention Plan 2008 – 2013, (b) Council's Development Control Plan (DCP) 2011, and (c) with State planning instrument guidelines under Section 79C and Section 75F of the New South Wales Environmental Planning and Assessment (EPA) Act.

Conclusions

With regard to Security Objective 4, the Section 75W MOD3 application drawings provide the developer with an appropriate foundation upon which to build crime prevention (security) design and security management strategies. Previously agreed CPTED strategies and those outlined in Security Objective 2 above be reflected in detailed construction certificate documentation.

We are of the opinion that, in terms of Section 79C and 75F of the EPA Act, and Parramatta City Council's DCP and Crime Prevention policy requirements, the reviewed amended drawings indicate intentional design strategies aimed at mitigating potential anti-social and criminal behaviour risks; in compliance with those instruments.

Compliance with Council's City Centre (CBD) crime prevention initiatives will be best reflected in the complementary development of a whole-of-site security management (CPTEM) strategy.

From a security design (CPTED) perspective, the reviewed and referenced drawings to be submitted as part of the Section 75W MOD3 application comply with policies and legislative requirements of (a) the Parramatta City Council's Development Control Plan 2011, (b) Council's City Centre Crime Prevention Plan 2008 – 2013 and (c) guidelines derived from the intent of Section 79C (1) (e) and 75F of the New South Wales EPA Act.

B THE REPORT

1 Consultancy Scope of the Proposed Development

On the 28 October 2011, the NSW Minister for Planning granted approval of the Crown International Holdings Group (Crown Holdings) V by Crown development as a "major project" (MP 09_0167) under the Part 3A provisions of the Environmental Planning and Assessment (EPA) Act, 1979, conditional on adopting the (Planning) Director General's requirements as Schedule 2 Parts A to F of the approval.

In 2012, Crown Holdings revised the development's parameters and submitted an amended proposal under Section 75W of the EPA Act. Harris Crime Prevention Services (Harris) reviewed the proposal to assess whether and how changes to the development's design might impact on the security design and management issues canvassed in the original Harris March 2010 Report submitted as part of the Part 3A application by Crown Holdings.

This current report re-visits our 2012 report. It canvasses design changes to be submitted in Crown's Section 75W MOD3 application, with respect to Crime Prevention Through Environmental Design (CPTED) impacts. Matters canvassed in our June 2012 report with respect to operational security management, applying Crime Prevention Through Environmental Management (CPTEM) principles, have the same occupancy applicability.

The primary change proposed is an increase in height of the portion of the proposed development in the south-western part of the site fronting Hunter Street (referred to as Section D) to provide an additional 7 levels of residential apartments. Section D will have a maximum height of 66 metres (19 storeys) with all apartments provided as apartments.

In additional to this change, the following more minor modifications are proposed:

Basement Levels

- Minor reconfiguration of the basement parking arrangement and minor increase in parking numbers.
- Modification of the below-ground archaeological display area at Basement Level 1 to remove the glassed display area and provide platforms to improve viewing and interpretation opportunities to the archaeological relics.

Ground Floor

- Reconfiguration of the archaeological plaza area at the frontage to Macquarie Street including removal of the interpretation centre (with additional space provided at the below-ground level) and provision of improved and more secure access to the below-ground archaeological display.
- Provision of additional retail space fronting the archaeological plaza to provide increased activation and casual surveillance of this area.
- Extension of the glass line at the southern frontage of the site to provide a larger and more-welcoming lobby entry to the southern part of the building accessed off Hunter Street with a separate Hunter Street address for the residential apartments.

Mezzanine

- Provision of expanded back-of-house facilities to service the additional apartments.

Level 1

- Reconfiguration of the residential amenities area to improve functionality, restoration of the function spaces and changes to the landscaped area and pool deck.

Levels 2 to 18

- Provision of more-secure access between the residential apartment component of the development (Section D) and the remainder of the development

Levels 8 to 11

- Conversion of approved residential apartments in Section D to residential apartments.

Levels 12 to 19

- Provision of residential apartments at additional floor levels 12 to 18 in Section D.
- Relocation of the approved roof terrace at Level 12 of Section D to Level 19.

Level 26

- Provision of a rooftop bar over Section C of the building.

The Crown Holdings aim remains the same; to present a 'welcoming and safe environment' across the entire footprint; an appropriate holistic aim. Harris defines this aim as: 'a *built form environment where crime prevention (security) has been considered as part of the master-planning, design and construction processes and where crime prevention outcomes will enhance a project's overall reputation through sound security risk management.*'

We re-iterate the definition of 'security' in any built form context as: '*planning, design and management measures whose outcome is to reduce, minimise and/or prevent the likelihood of anti-social or criminal behaviour targeting property or persons in any given urban or rural built form environment*'.

Similarly, 'security design' is based on the principles of Crime Prevention Through Environmental Design (CPTED); an internationally accepted model for applying aspects of architecture, engineering and technology to reduce or prevent crime in urban environments.

There are five CPTED principles – territorial definition, access control, natural surveillance, activity support and target hardening.

'Security management' is based on Crime Prevention Through Environmental Management (CPTEM).

There are five CPTEM principles – design maintenance, systems management, awareness monitoring, risk re-appraisal, and outcome evaluation. (Refer Appendix 2 for further explanations of CPTED and CPTEM)

In our view, the changes do not alter our assessment of the development's main security (anti-social and criminal behaviour) risks. Our Section 75W 2012 report concluded that, through CPTED and CPTEM strategies, risk mitigation was being addressed. In this application, there are some design issues requiring further CPTED consideration. Security Objective 2 addresses these.

In essence, this report reaches the same broad (positive) conclusions and/or recommendations for the Section 75W MOD3 amendments, as those contained in our Section 75W report of 2012 and our earlier report of 2010. While this current report re-visits our 2012 report, it is important to refer to, and/or re-state, contextual, design, management and compliance matters, which remain relevant to both the MOD3 proposals and to the overall project. This report is therefore not an abridged document. It:

(a) canvasses design changes to be submitted in Crown's Section 75W MOD3 application, with respect to Crime Prevention Through Environmental Design (CPTED) impacts;
(b) re-affirms the assessment and conclusions of our 2010 and 2012 reports;
(c) reinforces the importance of sound operational security management, applying Crime Prevention Through Environmental Management (CPTEM) principles.

The main security (crime) risks for the overall development remain as:

(i) unauthorised access to the any of the precincts within the development's footprint;
(ii) anti-social and/or criminal behaviour within and immediately surrounding, that footprint;
(iii) resultant damage to, or destruction of, the development's property or equipment;
(iv) harm or injury to persons associated with the development's mixed-use occupancy.

From the CPTED and CPTEM frameworks, four security (crime prevention) objectives address these risks: context, design, management and compliance, headed as:

Security Objective 1	Contextual Impact and Minimisation of Crime Risks
Security Objective 2	Specific Security Design to Support Crime Prevention Outcomes
Security Objective 3	Post-Construction (Occupancy) Security Management
Security Objective 4	Local and State (Planning) Instrument Compliance

The proposed Section 75W MOD3 design and use amendments are relevant to all four objectives. All are critical to the marketability, reputation and overall (security) duty-of-care towards retail and residential stakeholders and towards residential visitors, shoppers and individuals or groups accessing the site for heritage inspection and education.

From a security (crime prevention) perspective, the revised development should maintain a desire to design and manage the breadth of security risks on any part of the footprint, but specifically that of the six basement levels, the ground floor and the site's perimeter. Design and management of these risks aim to reduce and/or prevent initial and on-going operational anti-social and criminal behaviour.

There are only passing references to matters of security design and management in the October 2011 approval by the NSW Department of Planning and Infrastructure. Within Schedule 2, there are references to car park design, perimeters sight lines, emergency access, waste storage, lighting (including security lighting) and general matters of landscaping and signage. However, the revised development requires a re-examination of the security risks identified in the original development proposal and covered in the Harris 2010 Report.

The revised MOD3 development proposal must still comply with security-related State and Local Government legislation, including the Director General's Requirements (DGRs) pursuant to Section 75F of the EPA Act. (Security Objective 1).These requirements seek compliance with Safer-by-Design principles in relation to built form and other (security) measures related to the purposes outlined in the Development Application (DA). Safer-by-Design principles are in turn based on CPTED. Reference to this requirement falls within "Point 3 – Urban Design", of the DGRs covering the development's design and public domain.

The MOD3 proposal should ensure that post-construction operations should positively impact on reducing or preventing anti-social or criminal risk/activity in the surrounding neighbourhood. Design revisions should incorporate CPTED principles and post-construction operations should include a security awareness and place management plan, CPTEM. It is the Crown International Group's intention to continue to (intentionally) reflect these objectives.

The development's vision has not changed. It creates an innovative and interactive footprint for each of the 'uses', connecting commerce and residents with community and the contemporary with the historic. The central piece of history will showcase an important piece of Parramatta's (European) settlement history. The site contains foundations and lower walls of convict-built structures which have been excavated. The excavation fronting Macquarie Street is to be preserved for public viewing, rendering that part of the site's footprint particularly 'security vulnerable'. The juxtaposition of historic and contemporary architecture poses additional security challenges. The excavations will encourage casual visitors, history, architecture and archaeology students together with their professional counterparts, highlighting the Macquarie Street (level) precinct as a place of purpose in line with the vision and planning of Parramatta City Council (the Council).

We continue to emphasise that security design for, and security management of, this footprint requires treatment sensitivity involving inter-disciplinary solutions. Under the revised proposal the heritage precinct presents as a unique meeting, learning, socialising and welcoming environment – an environment to be protected by unobtrusive security solutions. The precinct's significance cannot be overstated; hence the need for a precinct-specific sub-plan engaging architectural form with the specialist disciplines of lighting, signage, landscaping and technology to arrive at the desired protective outcomes.

Co-location of the retail, community and residential footprint provide diverse yet consistent and frequent pedestrian and vehicle volumes, particularly during business hours. While these characteristics are less evident at night or on week-ends, the ebb and flow of 'eyes-and-ears' security 'traffic' is no less important

in complementing (security) design and management strategies. The legitimate presence of people is a proven deterrent of opportunistic anti-social or criminal behaviour, particularly behaviour targeting (Parramatta) city centre premises, street scapes or public space. Carefully managed 24/7 secure residential and retail secure access should reduce unauthorised access risks.

From our 2012 report, we reiterate that each precinct therefore has particular security risks. Each has particular solutions. However all are interconnected in marketing an inclusive spectrum of 'safe space'. The key issues pertinent to achieving the four security objectives are:

- the role of architecture and engineering in achieving an integrated 'whole-of-site' security outcome;
- innovative solutions for securing the heritage precinct;
- access control for pedestrian and vehicular traffic;
- layout and interconnectivity of vehicle entrances, exits, loading and parking spaces with the various mixed use operations;
- intra and inter-precinct pedestrian flow, liveliness and interactivity;
- form and robustness of building perimeter facades and set-back spaces;
- technical surveillance of sensitive precincts including utilities infrastructure;
- development of an interdisciplinary lighting, landscaping and signage sub-plans

2 The Stakeholders

The diverse stakeholder base comprises:

- Crown International Holdings Group;
- The New South Wales Department of Planning;
- Parramatta City Council;
- The Heritage Council;
- the broader (Parramatta) community;
- retail, commercial, heritage and residential owner/occupiers;
- Parramatta Local Area (Police) Command;
- visitors and contractors casually or intentionally accessing the site.

Each of these sub-groups will have different security expectations, pertinent to their specific involvement with the site, its safety for commercial, retail, residential and heritage operations. However, their broad expectations are similar in that personal and property safety will be a 'given' of the development. Therefore a 'welcoming and safe environment' is critical to the development's on-going financial viability and, more importantly, its stakeholder requirements associated with that viability.

3 Security Objectives and Outcomes

The four security objectives and their conclusions are addressed. While much of the content remains unchanged from that addressed in the Harris 2012 Section 75W report, additional commentary and new conclusions reflect the reviewed MOD3 drawings.

3.1 Security Objective 1 Contextual Impact and Minimisation of Crime Risks

- assessing the development's connection with the surrounding environment in terms of anti-social behaviour, criminal activity and/or potential crime risks. (The development should positively contribute to the 'safe city' strategy of Parramatta City Council through sound design and post-construction (security) management).

3.1.1 Urban Developments and Crime Risks

Our previous (2010 and 2012) reports emphasised that issues of anti-social behaviour, crime and crime risk management in dense urban environments are far from academic in today's security conscious world. The (security) reputation and therefore viability of every new commercial, retail, recreational and

residential development, especially in town and city centres is often put at risk from either a development's omission to seriously consider security strategies at design and post construction management, or conversely, from the impact of neighbouring precincts permitting crime risk and activity to 'spill' over to a new development.

Identifying crime trends and crime risk impacts can be fairly subjective. Statistics only relate to reported crime. The subjectivity arises when a crime risk analysis tries to second-guess total crime and crime trends by linking reported crime to anecdotal 'evidence' of unreported crime; sometimes said to be equal to, or more than, the reported crime in the more common property categories.

Therefore the security design and security management of this development must assume that random (opportunistic) anti-social behaviour and/or crime will occur in and around its three street frontages, unless effective counter measures are put in place.

From a crime minimisation and crime prevention perspective, V by Crown must be viewed in relationship to neighbouring or adjoining environments. However we again stress that in the first instance, a site-wide security strategy must set benchmarking standard that might then be emulated by adjacent complexes and beyond.

This suggests a continuum of perimeter strategies. The goal is to foster a different non-tolerance of crime reputation through a determination to 'build' an alternative reputation for the immediate and surrounding precincts. Design of the development's perimeters, vehicle and pedestrian access points should minimise opportunities for anti-social or unlawful behaviour, which if allowed to gain any tolerance or momentum, will 'contaminate' adjacent scapes and structures.

Obviously design is not the only way to counter the fear and reality of crime in the CBD. It is one well-recognised approach aimed at complementing other social, environmental and policing measures that already exist in the broader Parramatta community. However, as stated earlier, the DA documentation must indicate a potential through design development, to facilitate the containment and/or reduction of crime within and adjacent to the proposed site.

Mitigation of local crime risks will also depend on the relationship between the development and its 'neighbours' – adjacent office and retail blocks and their associated streetscapes.

3.1.2 Determining Crime Risks and Their Impact

The Australian and New Zealand Risk Management Standard and Guidelines (AS/NZS ISO 3000:2009) is the current benchmark instrument whereby generic risk is identified, quantified and 'modelled' as a risk management tool. The Standard is used nationally and, to a growing extent, internationally. It is an imperfect but useful method to tabulate and understand the nature, source, frequency, and consequences of risk 'types'. Initial or assessed risk calculations are given levels based on a lickert-style scale, usually as 'negligible' 'low' 'medium' 'high' and 'extreme'.

In determining specific crime risks for this development, the Standard provides guidance only. Scaled crime risk levels may be determined (assessed) from objective (official) crime statistics, police intervention, community observations and Council concerns.

But determining risks associated with crime in and around Parramatta's CBD sites is equally subjective in the way those risks are identified, quantified, assessed and managed. Subjectivity comes from different versions and/or perceptions of behaviours which may or may not become criminal incidents. Anti-social behaviour is common in some CBD precincts in towns and cities, especially at night when young people tend to 'cruise' empty and echoing streets, irrespective of whether they intend to commit crime. Noise and boisterousness do not constitute unacceptable behaviour to some, while they do to others. If alcohol is involved, then noisy night time behaviour by individuals or groups can escalate and deteriorate into criminality.

The purpose of this objective is (a) to identify the development's overall impact on the immediate and surrounding streets and (b) to determine if and/or how the MOD3 changes impact on (a). There are two CPTED issues, (i) does the proposed development's design or operations impede or support the perception or reality of personal and property safety and (ii) are there any design or operational

compromises that might cause, or cause an increase in, anti-social or criminal behaviour in the nearby streets or premises?

There is a third issue – that of existing anti-social or criminal activity in the immediate and neighbouring CBD streets. This is a separate matter that is unrelated to this security objective. The developers have no responsibility for broader security certainty. They obviously have no moral or legal obligation with regard to broader negative or positive security outcomes. However their approach to security design and management for the site may have a positive 'spill' and indirect influence on that environment. It depends on (a) how the development's security model is understood and received and (b) how that model accords with police and Council initiatives. Parramatta City Council's strategy of promoting a safer CBD requires the support of new developments. This development is important to Council's strategy.

Crown International's duty-of-care is simply to provide site wide safety for its stakeholders; that is, providing a development where property and people are protected and where safety (security) is promoted through appropriate design and management.

In summary, this Objective has again 'measured' existing neighbourhood (CBD) crime risks while simultaneously assessing how the proposed development (positive or negative) impacts upon those risks. The more immediate and useful data enabling crime risk analyses comes from:

- characteristics of neighbouring CBD premises and streets, conducive to a safe or unsafe local environment ;
- local police intelligence, operational intervention in the vicinity of the site;
- perceptions and interventions by Council and business groups;
- trends from the NSW Bureau of Crime Statistics and Research (BOCSAR), refer *Appendix 1*.

Collectively, these sources show continuous but not alarming concern at the range of property and person-related crimes in and around the city centre. Council and the Parramatta Local Area Command confirm that there are occasional 'spikes' in anti-social and criminal activity in or around the proposed V by Crown development due possibly to sporting or cultural activities centred on the mall, in nearby park lands or at sporting venues.

Throughout the CBD there is still evidence of property damage, from graffiti, and damage to street furniture, signs and facades or fences, especially in areas where after-hours and night time occupancy of premises is less than might be the case towards the main shopping centre (Westfield) and Church Street Mall.

Alcohol fuelled aggressive behaviour is reported to police by patrolling security officers and concerned or targeted individuals. Parklands to the north and west of the proposed development attract their share of damaging or aggressive behaviour, again mainly on week-ends and at night. Vehicle and/or property theft is prevalent in and around streets adjacent to Westfield Shopping Centre. Actual statistics vary.

Property damage appears to be stable or has lessened over recent years, due in part to Council and police initiatives. Council's City Centre Crime Prevention Plan notes the following:

"*Central to any effort to prevent crime is a solid understanding of the nature of existing crime problems. This requires detailed analysis of existing crime data. Detailed crime data was provided by the Parramatta Local Area Command (NSW Police Force) for the purposes of examining existing crime problems in the City Centre. While not all crime is reported to police, reported crime data does provide very important insights into the nature and extent of crime in a particular area.*" (2008:13)

According to locally compiled Police and Council statistics (Crime Prevention Plan op cit), the most frequently reported crimes in the Parramatta City Centre continue to be stealing from retail stores, from motor vehicles, stealing of motor vehicles and stealing from individuals. Assaults and malicious damage are the other most common offences. These are similar to criminal activity in most high density urban settings. They reflect the nature of a city centre.

There are many and varied explanations for levels, types, sources and frequency of such offences and behaviour in and around the CBD but debate around these characteristics is only relevant to devising design and management strategies that will 'secure' V by Crown in such a way as not to add to existing

anti-social or criminal activity. The responsibility of this development is to, at worst contain, but at best, make a positive contribution to the goal of preventing anti-social or criminal activity anywhere in the CBD. In this regard, The application of CPTED and CPTEM principles are the key.

3.1.3 Crime Risks in Neighbouring Environments

This development forms part of Parramatta CBD's revitalisation master plan. Council, commerce, police, the State Government and the community have been collaborating on Parramatta 2020/2025, a plan to re-develop the entire CBD to attract business, residential and recreational activity, with security (personal and property safety) as a key platform.

Initiatives for open space, commercial, retail, residential and recreational connectivity have begun with an initial focus on transport, streetscape design and community facilities. CBD development proposals should reflect the master plan's intent. A recent example is the justice precinct where building and intra spatial relationship design have exemplified new standards of security. The transport interchange and treatment of the Church Street civic place extension are other examples. Recent State and Council proposals for a light rail network radiating out from the CBD, are designed to attract commuters from adjoining suburbs to Parramatta as principal employment hub.

These are the beginnings of the master plan. Each affords 'security' new prominence. Each is a step in reducing anti-social and criminal behaviour risks, threats and incidents. Each contributes to creating the vision of a transformed and safe CBD.

While this development has no direct relational responsibility for anti-social and criminal behaviour (security) issues in neighbouring and surrounding environments, there is the obvious obligation under Council's DCP and City Centre Crime Prevention Plan to avoid the perception that anti-social and criminal behaviour is of no consequence to the security of surrounding neighbourhoods.

3.1.4 Adjoining and Surrounding Buildings

It would appear that there has been no increase in property graffiti vandalism or serious damage targeting premises in close proximity to the proposed V by Crown development. The changing physical face of surrounding streets will reinforce a 'safe place' philosophy as more projects come on line. Past observations noted uncoordinated combinations of external perimeter security lighting and/or CCTV coverage which hopefully will change.

External lighting, landscaping and CCTV coverage of the proposed site's ground level entry and public plaza should showcase the precinct. Council's street lighting plan to ensure consistent illuminance, colour rendition and shared precinct 'spill'.

Conclusions: Security Objective 1

The development complements positive neighbourhood 'safe place' pedestrian and vehicle activation – residential, passive recreational, commercial, heritage and retail – as part of a safer CBD strategy. Higher pedestrian activation volume and diversity will continue as the neighbourhoods demographic changes due to Parramatta's 'roll-out' of its CBD strategy. The development will connect appropriately with this strategy. The mixed use operations accord with other CBD interactivity, with pedestrian and vehicle movements to and from the site and its immediate surrounds, generating purposeful presence. The activity will add welcome interspatial flow to that part of the CBD.

From our review of the MOD3 drawings, there are no aspects of the development's design variations likely to cause, condone or promote anti-social or criminal behaviour in or around the local neighbourhood.

Rather, we are of the view that the overall design, including the MOD3 proposals are likely to promote a positive impact on community connectivity and cohesion, in line with Council's broader initiatives to reduce and prevent opportunistic anti-social behaviour and criminal activity throughout the CBD.

The revised proposal's overall design and operations are likely to promote positive pedestrian and vehicle activation in and around the development's footprint. In our view the revised Section 75W MOD3 proposal should not cause, condone or otherwise encourage, anti-social or criminal behaviour and/or constitute any increase in community crime or crime risks. Our contextual review and assessment confirms incorporation of CPTED principles aimed at projecting a 'welcoming and safe place' platform for the development's occupants, including contractors and visitors.

3.2 Security Objective 2 Specific Security Design to Support Crime Prevention Outcomes

- identifying new vulnerable aspects of the development's MOD3 application requiring specific *security design* input aimed at reducing and/or preventing opportunities to commit crime;

- affirming appropriate security design strategies already incorporated into the application and/or recommending possible changes to aspects of architecture and/or engineering, likely to enhance this security design objective.

3.2.1 Overall Security Design Impacts of the MOD3 Proposal

The MOD3 drawings reflect continued attention to earlier reported CPTED principles in the proposed changes. The development's precinct architecture is mindful of the significant issues with regard to pedestrian and vehicle movement as that movement impacts on the mixed use vision for the site. Therefore way-finding and parking design is critical to preventing and/or resolving security related tensions in the accessing the various precincts. Macquarie Street is the site's welcoming heart. Security design should support the heart's form. Importantly, the heart is heritage which again from a security perspective requires design sensitivity.

We have considered the following design aspects or parameters of the MOD3 drawings as they relate to the application of the five CPTED principles; territorial definition, access control, natural surveillance, activity support and target hardening.

3.2.1.1 Basement Levels

- Minor reconfiguration of the basement parking arrangement and minor increase in parking numbers;

Our 2012 report noted appropriate (transparent or perforated) roller shutter access to the six basement levels from Hunter Street. We noted an orderly vehicle movement and parking bay layouts in all six levels.

The MOD3 drawings indicate layout consistency with no visual interruption to progressive vehicle movement between levels. There is appropriate passive surveillance along and across parking bays, particularly in relation to the allocation of disabled parking bays.

Modifications maintain sight line and surveillance certainty around lift lobbies which remain clear of obstructions (apart from the occasional structural column).

We reiterate the need for graduated overhead lighting to highlight the ramp's entrance to and through the roller shutter, which should feature an over-riding mechanism located away from easy external manual reach. The waste storage and loading dock areas should be illuminated (ideally above the minimum Standard) to highlight these spaces.

In this (and with all such developments) the risk of tailgating remains allowing unauthorised vehicle and pedestrian access into and beyond Basement 1. High lux levels and a consistent 'throw' of illuminance throughout the basement levels should provide high-definition vehicle recognition and recognition of

pedestrians moving towards or away from vehicles. Reflective ceiling paint aids lumen strength and minimises shadowing.

We note that access to the residential apartments is via a separate lift core from Basement 1 and Basement 2. These lifts can also be used for controlled apartment access. The 'apartments only' lifts have separate lobby doorways, which, we recommend, should be access controlled. We also recommend the installation of IP network (CCTV) surveillance cameras at the apartment lift lobbies on all levels. Ideally, (subject to fire and BCA regulations) all lift doors should feature either full or eye-level glass panels as a way of 'noting' a presence in lifts or at lift lobbies; an added security precaution.

Each basement should have total camera surveillance coverage, appropriately 'signed' to deter and detect suspicious behaviour. Surveillance should cover ramps, loading areas, entrances to plant rooms, lobbies and the more distant parking bays.

The Basement 1 bike parking spaces and storage allocation on all levels can be easily observed and will be under camera surveillance.

- Modification of the below-ground archaeological display area at Basement Level 1 to remove the glassed display area and provide platforms to improve viewing and interpretation opportunities to the archaeological relics.

There are no additional crime risk issues with this modification. Permitting improved platform viewing from increased activation in and around the re-located interpretation centre will enhance casual surveillance.

Concerns during construction remain and we are advised that the zone will be fully enclosed, alarmed, camera monitored and well lit at all times. Our 2012 report also recommended:

(a) that pedestrian movement at or near the site should be designed to maximise interest while minimising unlawful access opportunity;
(b) the installation of 'activity driven' recording cameras would augment, but integrate with a whole-of-site IP Camera network and alarm detection systems;
(c) that the Interpretation Centre should also be under constant internal and external camera surveillance;
(d) that the design and location of possible concierge style security offices/control points within observational 'reach' of both sites would facilitate purposeful passive surveillance;
(e) regular security patrols should focus on the archaeology, particularly at vulnerable evening and week-end periods.

3.2.1.2 Ground Floor

- Reconfiguration of the archaeological plaza area at the frontage to Macquarie Street including removal of the interpretation centre (with additional space provided at the below-ground level) and provision of improved and more secure access to the below-ground archaeological display.

From a crime risk and prevention perspective, the separation of the entry, plaza and retail from the archaeological site adds (pedestrian) activation clarity. The plaza from Macquarie and Marsden Streets invites purposeful access to retail and residential areas while also encouraging social (stay) space. The intentionality of accessing the archaeological space, including the interpretation centre does indeed create focussed surveillance within a 'contained' below-ground feature.

The entire ground floor and basement archaeological site, interpretation centre and storage area is appropriately covered by IP camera surveillance. (refer 3.2.1.1 comments above)

- Provision of additional retail space fronting the archaeological plaza to provide increased activation and casual surveillance of this area.

The extra retail and al-fresco dining adds to the casual surveillance of the plaza and residential entrances. The plaza's re-design retains the overall 'safe place' theme for this important public domain.

The combined retail and residential entry spaces from the Macquarie, Marsden and Hunter Streets maximise passive surveillance options, along the corridor's length, in and around the lift lobbies and at retail entries. A safe 'three-way' pedestrian flow is therefore maintained. There is ample sight line certainty for staff manning reception or concierge desks. As part of a security operations plan, a security management centre is recommended, housing camera control and monitoring equipment. The office located to the rear of the desks is ideally suited for this purpose.

We note no changes to the provision of safe waiting space for residential apartment lifts. Appropriately, access to residential apartments is via proximity cards. We also note the secure location of garbage rooms, plant and switch rooms.

The ground floor (public) toilets feature an 'open access' design, thereby reducing the possibility of inappropriate behaviour and/or entrapment.

Proposed landscaping will add to the welcoming of the plaza. Ground level drawings (and upper level terraced areas) indicate appropriately planted shrubs, ground cover and/or 'boxed' plantings which do not appear to obstruct key observational points, or lead to likely concealment. All (low level) plantings should adhere to the CPTED recommended maximum height of 1.0 metre at maturity. Existing and new street level tree plantings should ensure that matured canopies have under-storeys of at least 1.5 metres, with no opportunity for branches to permit access to lower level apartment balconies or other roofed areas.

There is a low risk but high consequence of the development being targeted to inflict serious structural damage and/or harm to people. Low level landscaping has the potential to conceal explosive devices. As a low cost solution, in addition to IP camera and natural surveillance of the ground precincts, we recommend installation of strong wire mesh at depths of around 50 - 100 mm below surface soil or mulch in potted or boxed plantings.

Ground level plaza (and upper level terraced) furniture does not cause any security design concerns. However, as with our previous reports, we continue to advocate that all external lighting be of overhead illuminance to avoid eye-level bollard or 'up light' glare. Both latter luminnaires are severe passive surveillance limiters.

- Extension of the glass line at the southern frontage of the site to provide a larger and more-welcoming lobby entry to the southern part of the building accessed off Hunter Street with a separate Hunter Street address for the residential apartments.

This provision enhances surveillance and provides purposeful north-south pedestrian activation through the site or to the residential apartment lifts. The three entry points coalesce to decrease unexplained loitering, particularly around the Hunter and Marsden Street access. We understand that IP camera surveillance will cover all ground floor activation, including the Hunter Street vehicle entry ramp and the entire exposed perimeter facades.

Overall, the MOD3 drawings indicate contained and controlled pedestrian movement within and across all ground floor spaces – plaza, reception corridors, lift lobbies and retail. In particular the re-location and re-design of the archaeological site's podium and view platform maximises passive and technical surveillance opportunities.

As mentioned in our 2012 report, except for visitors and members of the public, residential owner/occupiers have designated entry and limited access points determined by appropriate signage and access control technology. Design detail will better express the flow consistency. From a security perspective, there is no movement confusion.

3.2.1.3 Mezzanine

- Provision of expanded back-of-house facilities to service the additional apartments.

The provision of additional back-of-house facilities causes no concern in security design or security management terms. The residential lift lobbies remain secure as access to these spaces (offices) are via levels 5 and 6 lifts and/or stairways.

3.2.1.4 Level 1

- Reconfiguration of the residential amenities area to improve functionality, restoration of the function spaces and changes to the landscaped area and pool deck.

Level 1 combines residential and business amenities. As with other levels, access to the apartments is only via secure lift. Residents can access this level via lifts 5 and 6, utilising the sliding secure (glass) door separating the lounge area and apartment corridor.

Although the facilities/amenities express re-designed functionality and flexibility, there are secure entrances to each of the zones.

3.2.1.5 Levels 2 to 18

- Provision of more-secure access between the residential apartment component of the development (Section D) and the remainder of the development.

3.2.1.6 Levels 8 to 11

- There are no security design or security management concerns with these levels.

3.2.1.7 Levels 12 to 19

- Provision of residential apartments at additional floor levels 12 to 18 in Section D.

These changes raise no security design or security management concerns.

- Relocation of the approved roof terrace at Level 12 of Section D to Level 19.

The Level 19 (open sky) roof terrace is restricted to apartment occupants. The layout present no security design concerns. However there is a potential security management issue in relation to the area. This relates to the proposed balustrade height which, we understand, is subject to a Council height limit of 1400 mm. Our recommendation is for a design height of between 1800 and 2100 mm.

Provision of rooftop private or communal gathering spaces for apartment living is an increasing trend. Unfortunately there are also increasing reports of rooftop or upper level balcony accidents or incidents involving serious injury, death and property damage, often caused or fuelled by alcohol and other drugs consumed during social functions. Reports of objects thrown over balcony or rooftop balustrades are becoming disturbingly prevalent. These are both security and safety concerns.

There are a number of balustrade (security design) options for construction certificate consideration to mitigate this risk. In addition, formal and informal functions would need to be tightly supervised to complement (support) design initiatives.
Appropriately, the area will be part of the overall IP camera network coverage.

3.2.1.8 Level 26

- Provision of a rooftop bar over Section C of the building.

Drawings indicate an enclosed roof-top bar and informal lounge area with a surrounding water feature and east-side terrace. For the reasons indicated in 3.2.1.7 (above) we recommend that any proposed perimeter balustrade be of sufficient height to deter or prevent objects being inadvertently or deliberately thrown from this level.

Conclusions: Security Objective 2

We reaffirm that, where relevant, the overall design incorporates CPTED principles. Spatial zones and their controlled access are well defined, internal and external surveillance is maximised and the architecture reflects appropriate activity support and appropriate target hardening in critical locations.

From a crime prevention (security) perspective the Section 75W MOD3 drawings complement previous security design (CPTED) initiatives. Assessment and/or recommendations made under this Objective should enhance the overall security design of the development's footprint.

In our opinion, the Section 75W MOD3 drawings continue to reflect the development's 'welcoming and safe place' approach by incorporating, or intending to incorporate, CPTED principles into design amendments.

Reviewed drawings indicate application of architecture, engineering and technology to enhance the development's crime prevention design footprint, promoting appropriate solutions for retail, residential, commercial, heritage and basement precincts.

3.3 Security Objective 3 Post-Construction (Occupancy) Security Management

- outlining specific occupancy *security management* (CPTEM) strategies to enhance the development's sustainability and marketability as a welcoming and safe mixed-use 'destination'.

- ensuring that the development's operational reputation as a corporate contributor to the community, has a focus on minimising and/or preventing anti-social and/or criminal behaviour (a) within the site's footprint , while (b) advancing Council's CBD crime prevention initiatives.

3.3.1 Post-Construction Operational Security Management

The MOD3 design changes do not alter the need for an integrated security management plan (CPTEM) that will support CPTED initiatives and will deliver formal security awareness, procedures and practices as a strategy to manage on-going anti-social and crime (security) risks. CPTEM is therefore the point of connection with security design. This report reinforces, reiterates and/or expands our earlier commentary and conclusions.

Ultimately, from a security perspective, the development will succeed as a preferred 'destination' (a) if there is good security design and (b) on-going security risks are identified and managed to support design. This third objective encourages the developer to match the design benefits with security operations management benefits. Simply deploying contracted security patrols or guards as *the* management solution, is but a small part of meeting this objective.

Planned security management should enhance the design aim of welcoming and safe space while indirectly (hopefully) seeking to promote and model broader (beyond site) crime free environments in line with Council's City Centre strategies and in line with a 'public interest' continuum, implied by the EPA's Section 79C. Implementation of a CPTEM regime should contribute to the development's 'duty of care' and occupational health and safety requirements.

There are five CPTEM principles or elements to sustaining the development's ongoing security integrity; design maintenance, systems management, risk management, incident responses and outcome evaluation.

3.3.3.1 Design Maintenance

Too often CPTED related architecture, lighting, landscaping, signage and technology are not rigorously and regularly maintained. Maintenance failure is perpetuated through lack of observation and/or

reporting. Lack of maintenance examples include over-grown landscaping, light outages, and/or locks not working, emergency, way-finding and warning signs obscured and security cameras or alarms not regularly tested.

It is our experience that these design features should form part of a regular (maintenance) schedule to reinforce the CPTED brief. Maintenance scheduling should occur in similar fashion to maintenance scheduling of fire and emergency equipment.

3.3.3.2 Systems Management

Security technology systems are part of CPTED design. They should not only be integrated, but hardware and software systems should be regularly tested for reliability and capability. This is especially important in this context to ensure tenant and wider public access and surveillance technology (for example within the heritage precinct) is functioning to manufacturers' specifications. While suppliers will recommend minimum testing schedules for alarm and camera equipment, it is recommended that there be a comprehensive maintenance schedule to ensure maximum systems integrity.

Redundancy of security systems should be factored in to the development's operational budget; together with research and pre-purchase testing of replacement systems. There are two types of redundancy, use-by dates and, usually, the roll out of new technologies for example, better light-sensitive cameras. Technology must be constantly and professionally reviewed to meet contemporary (risk) challenges and conditions and in order to ensure that the hardware and software interfaces continue to complement (support) the human resource and security procedures/practice strategies.

3.3.3.3 Risk Management

'Levels' of security awareness should be developed to engage stakeholders – residents, tenants, the security and/or operations manager and other user-stewards of the development's footprint. Whether the site has separate security contractor arrangements or an integrated contract, we recommend enhanced security staff training to ensure currency in observation techniques, identification and assessment of security related risks and 'desk top' scenarios to help build and manage a 'risk-change' picture.

Applying consistent observation techniques when moving throughout the site's internal and external space is critical, in order to identify and 'challenge' suspicious or unacceptable behaviour and/or attempted unauthorised access, especially in relation to spaces associated with retail and the heritage precincts.

We would encourage the security staff, tenants, residents and regular contractors to receive security up-dates or briefings as part of scheduled facilities meetings and through on-line notification. Contract security staff should be monitored closely as to their understanding and application of the risk management approach. Regular reviews of security awareness, procedures and practices regime will confirm vigilant and lasting security integrity. Security professionalism by security contractors sustains levels of security confidence for all owner-occupant stakeholders.

In our experience there is often a disconnection between developments per se as 'safe place' and, neighbouring buildings, public space and/or streets, which could be experiencing unacceptable or threatening incidents. Part of the CPTEM plan should be to review both site *and* neighbourhood risks, to 'test' mutual security integrity. Risk reviews can be done by stakeholders in concert with local police and/or security professionals. The Council and local police would probably take joint leadership in conducting regular risk reviews on behalf of direct and indirect stakeholders.

3.3.3.4 Incident Responses

Procedures should be in place for responding to anti-social and criminal incidents. Consideration should be given to conducting workshops for in-house or contract security and/or concierge staff to strengthen incident recording and reporting procedures to ensure they are (i) factual, (ii) relevant, (iii) accurate, (iv) clear, and (v) complete.

Observing, recording and reporting of incidents of vandalism, building damage and/or equipment or systems failure should be seen as incident responses, though not obviously having the same urgency.

Responding to, recording and reporting on incidents form the basis for reviewing crime risks. Security (anti-social and crime) risks change with circumstances. They change, for example, when, car parks are breached or when there are patterns of theft from vehicles in nearby streets, where assaults are reported and/or there are security issues around the public and heritage spaces. These situations can become the basis for desk-top facilities management (security) reviews (a) to ensure that risks are understood, (b) to clarify any 'new risk' identification and (c) to train to identify and/or manage newly identified risks (3.3.3.3 above).

3.3.3.5 Outcome Evaluation

In our experience, we rarely come across any stakeholder evaluation of CPTED and CPTEM initiatives. There are long term cost savings and reputational benefits from measuring the effectiveness of these initiatives. The effectiveness of fire and other emergency systems and procedures is regularly evaluated and we recommend a similar approach for measuring CPTED and CPTEM outcomes. We would encourage the V by Crown development stakeholders to conduct regular outcome review for both the (security) design and management initiatives.

Formal or informal sharing of security *awarene*ss and/or management and evaluation of those experiences in busy neighbourhoods, commercial, institutional, retail and recreational complexes is not the norm. Neighbours in high density CBD or neighbouring high density environments often don't converse, let alone agree on how neighbourhood security awareness programs should be introduced or evaluated. Commercial owners and tenants simply 'rely' on security procedures. However there are opportunities for such initiatives here given its strategic importance to the 'safe space' and commercial outcomes of V by Crown and Parramatta City Council; outcomes which we would encourage. Evaluation is part of good CPTEM practice.

In the first instance, concierge and/or security staff should develop a simple check list to ensure (a) an understanding of how the overall security management process is working and (b) a knowledge of current risk levels. More formal evaluations might be contemplated to affirm appropriateness and effectiveness. These evaluation models might be shared with other CBD 'destinations', the retail precincts, police and Council.

Also security goals should be linked to immediate neighbourhood security risk initiatives to compare security effectiveness for the neighbourhood and broader Parramatta community. Documented and shared crime prevention (security) experiences could be a valuable and replicable evaluation tool.

Conclusions: Security Objective 3

It is essential that the on-going security reputation of the V by Crown development is served by reviewing and implementing a whole-of-site CPTEM strategy, to promote a 'zero-tolerance' regime with regard to anti-social and criminal behaviour.

Security Objective 3 is linked to compliance requirements (Security Objective 4). All operational stakeholders have on-going responsibility to identify and manage (reduce or prevent) risks associated with possible future site-based anti-social and criminal behaviour. The community (public) interest is a continuing one, in this case as part of the Council's broader CBD crime prevention initiatives.

In our view, the collective operational stakeholders should continue dialogue with Council, with privately engaged security contractors and with local police in preparing and implementing a CPTEM strategy; sharing ideas and resources for greater neighbourhood (security) impact.

While residential tenants will provide their own security resources and systems, this should happen in collaboration with the site's non-residential security arrangements, to ensure holistic site (security) awareness and operational systems/management integration.

We recommend the adoption of an up-dated whole-of-site CPTEM strategy to complement agreed security design solutions in Security Objective 2, (a) to enhance the overall marketability and reputation of the development as a 'welcoming and safe place', (b) to model 'best-practice' solutions by coordinating the management of on-going security risks, across all occupancy designations and (c) to comply with, and support, crime prevention policies and initiatives of Parramatta City Council.

3.4 Security Objective 4 Local and State (Planning) Instrument Compliance

- ensuring compliance with: (a) Parramatta City Council's City Centre Crime Prevention Plan 2008 – 2013, (b) Council's Development Control Plan (DCP) 2011, and (c) with State planning instrument
- guidelines under Section 79C and Section 75F of the New South Wales Environmental Planning and Assessment (EPA) Act.

Drawings have been reviewed to assess security design (CPTED) compliance with the following planning instruments – the NSW Environment Planning and Assessment (EPA) Act, 1979 and Parramatta City Council's DCP and Council's City Centre Crime Prevention Plan. While there is no compliance requirement regarding CPTEM, there is a public and stakeholder interest to ensure that security design compliance is matched by appropriate security management; hence Security Objective 3.

3.4.1 Compliance with State Government Legislation and/or Policy Guidelines

The NSW EPA Act, 1979 allows provision for instruments to regulate or codify issues pertaining to environmental impacts of (normally) large scale and modest developments. Security (crime prevention) is one of the "impacts" allowed for.

Section 79C (1) states: "*In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development, the subject of the development application*".

Section 79 (1) (b) adds: "…*the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality*".

Section 79 (1) (e) adds: "…*the public interest*".

The 2001 amendments to the interpretive guidelines for this Section state: "…*Crime prevention falls under these subsections of 79C. Councils have an obligation to ensure that a development provides safety and security to users and the community. If a development presents a crime risk, these guidelines can be used to justify:*

- *modification of the development to minimise the risk of crime, or*
- *refusal of the development on the grounds that crime risk cannot be appropriately minimised*".

Interpretation of "the public interest" includes the relevant stakeholder individuals and groups – in this case, government, commercial, retail, heritage and community groups. The public interest in relation to this development is to create, sustain and promote 'safe space' outcomes, thereby preventing any anti-social and/or criminal behaviour that might put at risk any of those outcomes. The public interest could arguably extend to preventing unacceptable behaviour near to and beyond the perimeters of the site, although strictly speaking, the developer has no responsibility for such behaviour. However, one outcome of a successful whole-of-site security regime would be to model that success to neighbouring premises and or streetscapes.

The other obvious outcome of successful site-wide security is to displace potential unruly behaviour. This (unintended) consequence can be enhanced if the development's stakeholders agree to work with Council and 'neighbours' to spread or share security success such that potential crime risks fail to

eventuate through dissuasion. A review of current drawings indicates the client's design intention to dissuade and displace potentially crime-related behaviour.

The NSW Department of Planning has issued 'Director General's Requirements' (DGRs) pursuant to Section 75 F of the EPA Act. These requirements seek compliance with Safer-by-Design principles in relation to built form and other (security) measures related to the purposes outlined in the Development Application (DA). Safer-by-Design principles are in turn based on Crime Prevention through Environmental Design (CPTED) an internationally accepted model for applying aspects of architecture, engineering and technology to reduce or prevent crime in urban environments. Reference to this requirement falls within "Point 3 – Urban Design", of the DGRs covering the total development's design and public domain.

There are dual compliance requirements; (a) that of the Department of Planning and Infrastructure specifically relating to CPTED design under the EPA's Section 75 and (b) that of the Section 79C guidelines which include CPTED under the public interest category.

3.4.2 Compliance with Local Government Legislation and/or Policy

Parramatta City Council's DCP, 2011, requires developers to consider CPTED principles when submitting DA documentation. Council's City Centre Crime Prevention Plan (2008-2013) sets out key initiatives for maintaining the CBD as 'safe space'. Council's 2020-2025 vision document detailing the City Centre's revitalisation insists that the control and prevention of anti-social and criminal behaviour is an essential component of future visionary architectural form. Council is working with the State Government in ensuring a coordinated approach to compliance through innovative (security) design.

Throughout New South Wales and other States, development applications are increasingly required to demonstrate the incorporation of CPTED or Safer-by-Design principles into master planning and design documentation. (*These principles are explained fully as Appendix 2*)

MOD3 amendments should incorporate relevant CPTED design features to continue to reflect compliance with State and Local requirements, alluded to in out 2010 and 2012 reports. We remain satisfied that the client has taken a whole-of-site approach to security design in each of the development's iterations.

Conclusions: Security Objective 4

With regard to Security Objective 4, the Section 75W MOD3 application drawings provide the developer with an appropriate foundation upon which to build crime prevention (security) design and security management strategies. Previously agreed CPTED strategies and those outlined in Security Objective 2 above be reflected in detailed construction certificate documentation.

We are of the opinion that, in terms of Section 79C and 75F of the EPA Act, and Parramatta City Council's DCP and Crime Prevention policy requirements, the reviewed amended drawings indicate intentional design strategies aimed at mitigating potential anti-social and criminal behaviour risks; in compliance with those instruments.

Compliance with Council's City Centre (CBD) crime prevention initiatives will be best reflected in the complementary development of a whole-of-site security management (CPTEM) strategy.

From a security design (CPTED) perspective, the reviewed and referenced drawings to be submitted as part of the Section 75W MOD3 application comply with policies and legislative requirements of (a) the Parramatta City Council's Development Control Plan 2011, (b) Council's City Centre Crime Prevention Plan 2008 – 2013 and (c) guidelines derived from the intent of Section 79C (1) (e) and 75F of the New South Wales EPA Act.

4 Consultancy Methodology

The methodology indicates the perspective taken by the consultants in undertaking our analysis and making recommendations. The consultants have:

(a) reviewed the Section 75W MOD3 drawings in order to understand the architectural changes as they relate to security design and security management of the development;
(b) received input from the developers' design and management representatives;
(c) up-dated the crime risk backdrop including information about local anti-social and criminal activity;
(d) obtained information in relation to local and State (security focussed) planning instruments.

5 References

Allen Jack + Cottier Architects, Site and Building Drawings; plan views, elevations, sections and perspectives published internally; marked 10052, various issues, to be submitted as part Section 75W MOD3 application.

Australian and New Zealand Risk Management Standard and Guidelines (AS/NZS ISO 3000 : 2009) published Standards Australia, Sydney.

Crowe T, *Crime Prevention Through Environmental Design* Third Ed Butterworth-Heineman, Boston, 2005.

Higginbotham E and Associates, Report on the Macquarie Place Heritage Precinct, September 2009, published internally.

Newman O, *Defensible Space* Macmillan, New York, 1972.

NSW Government, Department of Planning – Director General's Part 3A Guidelines for the proposed project, 2009, published internally.

NSW Government, Environmental Planning and Assessment Act, 1979 (as amended), published by the NSW Government.

Parramatta City Council, Development Control Plan 2011, published internally.

Parramatta City Council, City Centre Crime Prevention Plan 2008-2013, published internally.

Taylor Brammer, Landscape Architects Pty Ltd, Preliminary (draft) landscape drawings dated 20.06.2014.

Appendix 1

NSW Bureau of Crime Statistics and Research – Parramatta Suburb Crime Data

The following crime statistics 2009 to 2013 are relevant to this development *Source: NSW Bureau of Crime Statistics and Research. Number of recorded incidents and rate per 100,000 population.*

NSW Crime Statistics January 2009 to December 2013 for Parramatta (Suburb)

	5 Year Trend to Dec 2013	Year to Dec 2009 Count	Year to Dec 2009 Rate	Year to Dec 2010 Count	Year to Dec 2010 Rate	Year to Dec 2011 Count	Year to Dec 2011 Rate	Year to Dec 2012 Count	Year to Dec 2012 Rate	Year to Dec 2013 Count	Year to Dec 2013 Rate
Homicide	n.c.	0	0	0	0	0	0	1	4.5	1	4.5
Assault - domestic	stable	122	564.2	111	494.8	112	499.3	126	561.7	113	503.7
Assualt - non Domestic	stable	420	1942.2	413	1841	399	1778.6	379	1689.5	390	1738.5
Sexual assault	n.c.	15	69.4	20	89.2	21	93.6	21	93.6	20	89.2
Indecent assault, act of indecency and other sexual offences	stable	54	249.7	43	191.7	46	205.1	45	200.6	40	178.3
Robbery without weapon	stable	60	277.5	71	316.5	65	289.8	60	267.5	76	338.8
Robbery with a firearm	n.c.	9	41.6	6	26.7	4	17.8	4	17.8	1	4.5
Robbery with weapon not a firearm	n.c.	30	138.7	33	147.1	21	93.6	11	49	17	75.8
Harassment, threatening behaviour & private nuisance	up 8.6% per year	154	712.1	197	878.2	254	1132.3	246	1096.6	222	989.6
Other offences against the person	n.c.	9	41.6	8	35.7	15	66.9	20	89.2	7	31.2
Break & enter dwelling	stable	150	693.6	258	1150.1	188	838.1	192	855.9	218	971.8
Break & enter non dwelling											
Motor vehicle theft	down 13.5% per year	122	564.2	99	441.3	82	365.5	82	365.5	71	316.5
Steal from motor vehicle	stable	315	1456.6	229	1020.8	216	962.9	261	1163.5	246	1096.6
Steal from retail Store	stable	700	3237	588	2621.1	653	2910.9	711	3169.4	672	2995.6
Steal from dwelling	up 10.5% per year	51	235.8	62	276.4	51	227.3	78	347.7	79	352.2
Steal from person	down 5.1% per year	223	1031.2	203	904.9	157	699.9	153	682	188	838.1
Liquor offences	up 6.8% per year	197	911	147	655.3	154	686.5	227	1011.9	266	1185.8
Drug offences	up 12.4% per year	181	837	192	855.9	248	1105.5	397	1769.7	300	1337.3
Malicious damage to property	stable	404	1868.2	414	1845.5	419	1867.8	440	1961.4	426	1899
Prohibited and regulated weapons offences	stable	88	406.9	70	312	81	361.1	99	441.3	92	410.1
Arson	n.c.	24	111	10	44.6	10	44.6	15	66.9	19	84.7

NOTE: The statistics need to be treated with caution as they represent only reported crime, therefore, a number of categories may also indicate lower than actual incidents.

Further, it is important to note that changes in reported crime are also significantly affected by factors other than changes in victimisation, including (i) changes in the willingness of the public to report crimes to police, and (ii) changes in policing policy and practice. The second factor particularly affects trends in recorded drug and weapons offences, and trends in offensive behaviour, so changes in the number of incidents for these offences may reflect shifts in policing, rather than in actual crime rates.

Where the number of recorded incidents is low, a very small change in the actual number of incidents may result in a disproportionately large change in derived ratios such as the rate per resident population or the percentage change over time.

Therefore, it is important that any increase in criminal activity should be factored into the auditing and development of site policies, procedures (including maintenance), technology and training.

Appendix 2

Crime Prevention as a Design and Management Strategy

A 1.1 Rationale

Crime prevention has been linked to urban design since the late 1970s. The concept originated in the United States and Canada when sociologists, criminologists and architects began to link criminal behaviour in public spaces with poor design and layout of those spaces.

Today, there are four broadly defined models of crime prevention. They may be implemented individually, although ideally initiatives derived from each will overlap. The four models are:

Crime Prevention By Social Intervention – a model that sustains the integrity and safety of (often disadvantaged) communities through government and corporate and local support for programs, development initiatives and improvements to infrastructure.

Crime Prevention By Community Development – a model that encourages settled communities to develop partnerships in accepting responsibility for protecting personal and neighbourhood assets through a commitment to networking and sharing responsibility for community development goals.

Situational Crime Prevention – a model that focuses of place-specific crimes, targeting offences and offenders by pro-active and responsive security or law enforcement strategies.
Crime Prevention By Environmental Design – a model that incorporates aspects of architecture, engineering and technology to enhance the form, function and reputation of the built environment as "safe space".

Crime Prevention Through Environmental Design (CPTED) is a coined version of the Crime Prevention By Design model; one that takes a specific approach to reducing and preventing crime by applying architectural design principles to urban developments which focus on territoriality, surveillance and access control. CPTED and the other models have largely been adopted throughout the developed world as legitimate crime prevention strategies.

Throughout the 1980s and 1990s, State and local authorities within Australia, responsible for urban development approvals, have been gradually adopting the CPTED or similar crime prevention (design) concepts when approving both large and small scale development applications.

Within Australia, there is recognition by all stakeholders involved in urban development, (however the term is defined) that designing out crime should form part of *mandated* development application criteria.

In 2001-2, the New South Wales Parliament assented to changes in guidelines under Section 79C of the EPA Act to include crime prevention as one of the "matters of public interest" which must be considered in approving development applications.

Increasingly, local authorities are introducing instruments and/or guidelines requiring 'security' to form part of DA documentation.

Notwithstanding local and State based regulatory requirements, it would seem prudent that developers seek to incorporate crime prevention-by-design guidelines to all projects, especially given the marketing and legal emphases on personal and community safety (security) Australia.

It is conceivable that, if built environments can be "secured" by adopting agreed crime prevention design guidelines, (protocols, etc.), then such guidelines will in time become mandatory in much the same way as Building Codes and Occupational Health and Safety standards have been adopted.

Incorporation of crime prevention architecture and engineering into relevant planning documentation throughout the design-and-construct stages is the ideal way to ensure compliance with local and State requirements.

A 1.2 Aims: Crime Prevention By Design

The broad aim of crime prevention design principles is to create and sustain safer communities by incorporating crime prevention design initiatives into all urban development.

From the literature, it is possible to identify two specific aims:

- To promote the legitimate and safe use of all natural and built environments by incorporating crime prevention or security design codes or guidelines into all development planning and approval processes.

- To enhance the reputation of developed environments by ensuring that crime prevention or security design criteria are integral to all architectural and engineering documentation submitted for review and approval by relevant authorities.

A 1.3 The Concept of "Defensible Space"

Oscar Newman (1972) coined the term. He developed the concept in relation to significant crime problems in high-rise ghetto type housing developments of New York City in the 1960s. Newman suggested that the urban design of inner city precincts was directly attributable to anti-social behaviour and high crime rates.

Newman recognised that there were three spatial issues that should be addressed in all future urban planning – territoriality, surveillance and access control. Each can be linked with architectural and/or engineering documentation in a coordinated approach towards making public and private spaces relatively crime free.

A 1.4 The Concept of Territoriality

It is essential to provide a sense of territorial definition and boundary limits from the first point of contact with any built environment design. That point of contact may be the front door of a building. It may be the off-road set back of an industrial estate, or it may be the main street – boulevard, divided road and/or entry statement – of a new sub-division. "On approach", the sense of definition of access and use should be evident.

Crowe (2000:37) suggests that the right physical design contributes to a positive sense of territorial use and ownership – a sense of territorial influence. In urban developments, territory may be defined or classified as public space, semi-private or communal space, restricted space and private or secure space.

Mixed use sub-divisions are particular cases in point. Each such development concept should flag spatial use and spatial hierarchy. This hierarchy should be evident as concepts, principles and foreshadowed specifics at the DA stage, to be followed by detail submitted throughout relevant aspects of design documentation.

The DA stage and design documentation architecture (and engineering) of vehicle or pedestrian corridors, commercial, retail, recreational, institutional, and residential precincts is as important as the architecture of the buildings that will eventually occupy those precincts. One without the other contributes to a sense of territorial confusion where territorial clarity is required.

Geason and Wilson (1989:5) claim that well designed housing projects make it clear which spaces belong to whom – some being completely private, some being shared and some public. Architects and developers of course claim that these aspects are always part of concept design, master-planning and detailed documentation. The difference is that they are seldom designed to standards or principles aimed at repelling crime.

A 1.5 The Concept of Surveillance

Spatial design should maximise opportunities for surveillance – formal and informal. The design principle here is to increase the number and length of sight lines; the capacity of people and technology to observe movement and activity at distance.

The location, mass, height, proximity and form of buildings therefore become critical design features. The relationship of buildings to all open spaces and to roads, pathways, cycle-ways, parks and other streetscape forms is equally critical.

There are three agreed forms of surveillance that should be encouraged: *natural, social and technological.*

Natural surveillance encourages casual observation and monitoring of all users and owners of known and defined urban space.

Social surveillance encourages casual observers, through natural surveillance, to routinely monitor, challenge or report suspicious pedestrian and vehicle movements through precincts or into buildings.

Technological surveillance employs CCTV and other monitoring devices to alarm premises or spaces to deter/detect and respond to unlawful access or unlawful behaviour. In the past, analogue CCTV surveillance technology consumed personnel resources including managing the recording, e.g. replace tapes of these early systems. Network cameras and network video recording (NVR's) offers a more cost-effective alternative. Modern fast moving 'dome' cameras, which respond to alarm pre-set positions can be utilised. The 'alarm' may be a help call button being activated, a secured door being opened (using a door contact) or movement (using a passive infrared detector) and transmitted real time to wireless hand held technology.

A 1.6 The Concept of Access Control

Debate continues about ways to control, restrict or prevent access to buildings and to open precincts. The deployment of technology has been the recent favoured design strategy. This (in our view) over-reliance on technology has tended to limit creative physical design alternatives.

In the mid-1980s a significant study was carried out in the UK into some of England's (often referred to as) notorious or infamous housing estates – high and medium rise ghettos where crimes against property and people has been running rife.

The study by Coleman (1985) showed in part that there were numerous building and precinct design flaws which encouraged uncontrolled access to ill-defined spaces. Coleman suggested that gates, gaps, fences, landscaping, lighting, doorways, stairwells, steps, paths, seats, power poles coupled to ad hoc building design and poor definition of territory, not only attracted unauthorised access, but once access was gained, the various design flaws encouraged graffiti, vandalism, theft and assault.

The point of all physical (built environment) design from a crime perspective is to define and indicate purpose. For example a gate to a property must be positioned to indicate whether or not it is a main entry and, if so by signage, mechanical, electronic or other means, entry is generally allowed or is by permission only. A gate's design and integration with a fence or adjoining building gives some indication of who and how entry is to be gained. Gates are usually the most common definers of territory, separating private and public space in industrial, commercial, institutional and residential precincts. There are some precincts without gates at their points of entry, thus inviting crossover to the next point of territory definition; ie a building, parking area etc.

While gates (and similar barriers) present as recognised objects for territorial definition and separation, crime prevention-by-design principles encourage broader and less intrusive definitional architecture; architecture which not only restricts or halts access, but which encourages entry, access and movement. Lighting, pathways, landscaping, low-line fencing, steps and doorways are obvious examples.
Coleman's study, highlights the need for developers to think holistically about distinguishing between legitimate (legal) access and users and occupiers of urban space and those seeking access illegally.

By applying crime prevention design principles to housing estates, to commercial, institutional and industrial complexes, to retail and recreational outlets and to transport infrastructure, there is more than one opportunity to clearly define appropriate entry and movement corridors.

A 1.7 Crime Prevention Through Environmental Management (CPTEM)

The application of CPTED design principles (A1.1 to A1.6) must be reinforced by the place management of identified security (anti-social and criminal behaviour) risks. The two strategies complement each other. Design seeks to reduce risks through creative physical intervention. Management seeks to build on the design outcomes by monitoring and managing on-going risks through stakeholder awareness protocols, through technology maintenance and renewal and through cooperative place management by police, security and facilities operatives.

CPTEM is often over-looked to the detriment of a development's reputation outcomes – marketability and stakeholder duty-of-care. On-going security management may fail if it is not approached strategically and responsibly. Ad hoc and/or intermittent attention to CPTEM can negate the design strategy and can leave owner-occupiers exposed to litigation in the event of threats or incidents occurring on any part of a development's footprint.
