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Crime Risk and Crime Prevention Through Environmental Design (CPTED) Consultancy

Final Report

in relation to

SSDA Application Number: SSD-35631707

**Project Name: St Leonards Telstra
Exchange Redevelopment**

**Location: 524-542 Pacific Highway
St Leonards NSW**

**Applicant: The Trustee for GFM Home
Trust Subtrust No.2**

20th October 2023

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In Confidence

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Crime Prevention Through Environmental Design (CPTED) Consultancy

in relation to

SSDA Application Number:	SSD-35631707
Project Name:	St Leonards Telstra Exchange Redevelopment
Location:	524-542 Pacific Highway St Leonards NSW
Applicant:	The Trustee for GFM Home Trust Subtrust No.2

EXECUTIVE SUMMARY

(extracted from the report)

ES 1 Engagement and Redevelopment Overview

Harris Crime Prevention Services (Harris) was engaged to provide a Crime Prevention Through Environmental Design (CPTED) consultancy to HOME for a build-to-rent redevelopment of the Telstra Exchange building (the redevelopment or project), located at 524-542 Pacific Highway St Leonards NSW. It is set amongst mixed-use properties and close to St Leonards railway station and Royal North Shore Hospital and Gore Hill Oval.

This CPTED report is submitted to the Department of Planning and Environment (DPE) in support of a concurrent State Led Rezoning and State Significant Development Application (SSD-35631707) for the redevelopment, comprising build-to-rent housing, commercial and retail land uses. The proposed redevelopment will specifically comprise the following:

- 1 Site preparation and excavation,
- 2 Retention and integration of the existing Telstra Exchange Building,
- 3 Construction of a new 42-Level mixed-use development, comprising:
 - (i) 5,233m² of non-residential space up to podium,
 - (ii) 21,577m² of build-to-rent housing across 31 Levels, including 272 dwellings,
 - (iii) 10 x Key Worker housing units at L8 in lieu of commercial floor space,
 - (iv) 84 Short Stay accommodation units within the 8 Level commercial podium,
- 4 1,768m² of community amenity facilities throughout the building,
- 5 Residential lobby accessed via Christie Street and separate commercial lobby accessed via Pacific Highway,
- 6 Podium car parking and loading area with vehicular access via Christie Street, comprising a 48-space car stacker,
- 7 Associated landscaping and public domain works; and
- 8 Augmentation of, and connection to, existing utilities services as required.

This report addresses the relevant Secretary's Environmental Assessment Requirements (SEARs) and Study Requirements regarding Section 8 "*Address how Crime Prevention through Environmental Design (CPTED) principles are to be integrated into the development, in accordance with Crime Prevention and the Assessment of Development Applications Guidelines.*"

It is noted that to facilitate the abovementioned redevelopment, amendments to the Lane Cove Local Environmental Plan 2013 are proposed via a concurrent State Led Rezoning to rezone the site from B3 Commercial Core to B4 Mixed Use and to increase the maximum building height of 72m to 155m. The FSR of the site will remain as per existing at 17.1:1.

ES 2 CPTED Objectives, Principles and Compliance

2.1 Overarching CPTED Objectives

We identify three overarching CPTED objectives:

- Objective 1 To understand the crime risk context and identify potential and actual crime risks.
- Objective 2 To affirm and/or recommend (crime) risk mitigation through CPTED solutions.
- Objective 3 To ensure (CPTED) compliance with State and/or Council planning instruments.

2.2 CPTED Principles

Our report's analyses, conclusions and recommendations are based on five acknowledged CPTED principles, adapted and applied by Harris from the 'original' Moffatt (1983) definitions as:

- Principle 1 Territorial definition – clarity about spatial identify, separation, boundaries and purposes,
- Principle 2 Natural surveillance – architecture facilitating strong sightlines for ground plane, basement and/or upper-level observation and surveillance,
- Principle 3 Access control – access-egress definitions - who goes where, when and why,
- Principle 4 Activity support – the influences of (external) lighting, landscaping and signage,
- Principle 5 Target hardening – adding specific and robust architecture and technology.

2.3 Informing Instruments and Compliance

We acknowledge that CPTED is not mandated or compliance-coded nationally or internationally. Its variously interpreted principles are mostly published as 'guidelines' or Standards.

In Australia, government authorities may require the application of CPTED principles as condition(s) of development consents, through local or State government planning instruments.

For the HOME redevelopment, the following planning or policy instruments/guidelines require or recommend CPTED to be considered in relevant aspects of built form and/or open space design, through inter-disciplinary architectural application.

Our analyses, conclusions and recommendations are therefore informed and/or underpinned by:

- (i) ISO 31000:2018, *Risk Management Guidelines*, and,
- (ii) ISO 22341:2021 *Security and Resilience – Protective Security – Guidelines for Crime Prevention Through Environmental Design*,
- (iii) Lane Cove Council, Development Control Plan 2010, as emended, Part D,
- (iv) NSW Environmental Planning and Assessment (EPA) Act 1979, as amended,
- (v) NSW Government, Planning Secretary's Environmental Assessment Requirements,
- (vi) NSW Police CPTED (or Safer-By-Design) guidelines; a 'Check List' Revision 2020,
- (vii) NSW Bureau of Crime Statistics and Research (BOCSAR),
- (viii) NSW Police – contextual (verbal contact) crime risk intelligence/information.

ES 3 Assessed Crime Risks, Potential Incidents and Consequences

The assessed crime categories, their risks and incident likelihood, should not be underestimated. This is not to alarm but to caution against mitigation complacency and to direct mitigation opportunities in the first instance towards CPTED solutions.

Anecdotal understanding, site knowledge, local police intelligence and BOCSAR data confirm common (and mostly predictable) crime categories likely to 'target' the redevelopment.

Assessing *potential* risks, levels and incident likelihood of the following categories must always be balanced against the possible '*consequences*' of breaches and *actual* criminal threats or incidents.

Even the most *minor* offence occurring within or near buildings, communal or public spaces and on surrounding streetscapes can have *major* consequences. Hence the need to address each crime category as having potentially serious consequences.

Our assessment is based on risk-to-incident likelihood for all categories: ‘low’ (**L**), ‘moderate’ (**M**), ‘high’ (**H**) and ‘extreme’ (**E**). (Appendix 2 provides an illustrative crime incident matrix, adapted from Standard ISO 31000:2018, *Risk Management Guidelines*).

Risks and likelihood of categories (i) to (vi) occurring are assessed as:

- (i) intimidating anti-social behaviour targeting residents, visitors or contractors, (**L**) - (**M**),
- (ii) physical and/or sexual assaults against the (i) above categories, especially at night, (**L**),
- (iii) unauthorised access to premises and theft of property, (**L**),
- (iv) damage to buildings, facades, mailboxes, vehicles, infrastructure, landscaping, signs, furniture, fixtures and fittings, (**L**),
- (v) theft of personal or common property and/or theft from, or of, motor vehicles, (**L**) - (**M**)
- (vi) contextual drug possession, and drug dealing. (**M**)

There are two other potential categories. They are not likely to occur but have significant consequences if they do.

- (vii) arson or explosion(s), (**L**)
- (viii) injury or death to persons, damage to, or destruction of, property, from targeted and potentially, gang or terror-style attacks, (**L**).

ES 4 Consultancy Conclusions and Recommendations

CPTED Principle 1 Territorial Definitions Conclusions and/or Recommendations

The HOME redevelopment drawings display definitional design clarity. In CPTED terms, there are no ambiguously allocated spaces or confusing spatial purposes. Intra-site spatial separation is readily identified within the 01 basement, ground, lower ground, mezzanine and upper levels.

There is street-fronting and perimeter (boundary) clarity. Clearly identified built form locations, layout and spatial separation ensures contextual ‘knowledge’.

As a result, vehicle wayfinding to stackers, loading and unloading zones is appropriately designed. Pedestrian wayfinding is characterised by safe invitational destination clarity throughout the tower, but particularly at entrances, communal and private spaces across all levels and within the ground plane public domain.

Definitional clarity will enable and encourage safe time-determined informal legitimate foot traffic circulation and activation through the site.

This broad definitional clarity provides a foundation design statement, upon which to overlay Principles 2 to 5, as part of an integrated ‘welcoming-and-safe-place’ whole.

In our view, there are no other obvious CPTED-related definitional impediments.

The (combined) definitional elements present a coordinated and integrated ‘whole’, supporting the redevelopment’s marketing and security objectives. In turn, these objectives should mean an overall ‘safe place’ reputation – one which will be sustained, in part, by the commitment of residents and tenants to on-going stakeholder (security) stewardship.

CPTED Principle 2 Natural Surveillance Conclusions and/or Recommendations

The redevelopment's overall design elements promote multi-angle proximate and distant sightlines throughout the site. Internal and external (public domain) ground plane surveillance opportunities are strongest.

Reviewed drawings indicate ample opportunity for natural (passive) observation and surveillance:

- (i) within ground and lower ground plane reception and public spaces,
- (ii) along boundary and surrounding contextual streetscapes,
- (iii) approaching, and at, commercial, residential, retail and vehicle entrances,
- (iv) within designated public, communal and private spaces across all levels,
- (v) at internal vehicle stacking and loading-unloading zones,
- (vi) at and around reception, lounge areas, lift lobbies, and
- (vii) approaching, or at, internal plant-infrastructure and storage rooms.

Multi-angle, proximate-distant sightline opportunities should significantly enhance risk mitigation, including deterring unauthorised pedestrian and vehicle access or unusual (suspicious) behaviours within or around the redevelopment footprint.

However, reliance on the effectiveness of casual observation and/or intentional surveillance above mezzanine and throughout upper-levels may not add to overall surveillance effectiveness.

Notwithstanding these minor constraints, we conclude that current drawings maximise internal and external natural surveillance objectives; that is, to generate whole-of-site surveillance opportunities to deter and/or prevent unauthorised entry, damage to property and/or harm to all stakeholder-users.

CPTED Principle 3 Access Control Conclusions and/or Recommendations

Access control technology and procedural (operational) protocols are keys to ensuring the redevelopment's 'welcoming-and-safe' place reputation. It is therefore essential that:

- (i) all physical and electronic access control systems be monitored and maintained to ensure performance capability, and
- (ii) access control policies, procedures, protocols and practices be developed and strictly followed.

It is also important that these be fully understood and complied with, by all.

The security and controlled access of plant and storage rooms must be a design development priority.

We recommend that video intercom technology be specified for all residential apartments as pre-access identification. Contractors accessing all site zones should have to produce some form of identification prior to granting entry to the tower and relevant zones.

CPTED Principle 4 Activity Support Conclusions and/or Recommendations

CPTED relevant lighting aims to:

- (i) illuminate the redevelopment site footprint, perimeters and surrounds with (preferably) overhead luminaires for the public domain to improve night-time wayfinding and surveillance,
- (ii) avoid colour inconsistencies (clashes),
- (iii) increase minimum lux levels along lighting vulnerable internal back-of-house zones including the stackers, loading and unloading zones, lift lobbies and approaches to storage and plant rooms,

- (iv) support (night-time) surveillance at, and as 'spill' throughout the site, hopefully in colour temperature 'step' with Council's street and public space LED lighting initiatives,
- (v) highlight pedestrian and vehicle entry points,
- (vi) provide wayfinding certainty through the link, to strengthen whole-of-site night-time natural surveillance,
- (vii) provide consistent non-movement activated lighting in the basements, at high illuminance to eliminate low light or 'no light' opportunities for concealment or entrapment.

We recommend recessed, targeted and where practicable, overhead LED luminaires (+ - 4000 Kelvin) for the 01 basement, including for the entrances, lift lobbies and public domain wayfinding.

Luminaires should be sufficiently beam-angled to maximise throw, spill and (where appropriate) wash, eliminating basement shadowing and dark gaps.

Bollards should not be considered for any external lighting within the redevelopment.

Landscaping should:

- (i) eliminate possible concealment or entrapment within or around plantings,
- (ii) deter opportunities to climb mature plantings to breach mezzanine or other upper-level balcony security, and
- (iii) maximise ground plane sightline continuity,

Signage should consider first-time casual visitors and contractors. All signs should be disability inclusive. Strategically selected signage should be back-lit to improve legibility and wayfinding. Pictorial signs should be considered.

Inter-disciplinary coordination of these three 'support elements' is essential to enhance the overall safety (security) of the redevelopment. Design development should detail inter-disciplinary solutions.

CPTED Principle 5 Target Hardening Conclusions and/or Recommendations

We recommend targeted IP Network (CCTV) camera surveillance of the redevelopment footprint's, vulnerable spaces, covering:

- (i) commercial, residential, retail and vehicle entrances,
- (ii) the 01 basement,
- (iii) plant, infrastructure, loading and unloading zones,
- (iv) lift lobbies,
- (v) relevant areas of the public domain.

Designated camera locations aim to deter opportunities for concealment or entrapment and assist with authorised access identification.

Video intercommunication technology should be installed at each apartment to identify visitor-guests and maintenance contractors.

Anti-graffiti coatings are recommended for all ground floor (level) masonry finishes and to other identified vulnerable facades.

From a crime prevention perspective, the above treatments are not 'invasive'. We believe that design development drawings can specify combination solutions without creating a sense of fortressing.

Instrument Compliance: Conclusions and/or Recommendations

Harris Crime Prevention Services consultants are of the view that reviewed drawings of the proposed build-to-rent redevelopment at 524 – 542 Pacific Highway St Leonards NSW are consistent, or will be consistent during design development, with CPTED principles and their application as required by:

- (i) legislation and/or regulations and crime prevention guidelines derived from Section 4.15 of the NSW Environmental Planning and Assessment Act, 1979, as amended,
- (ii) the NSW Department of Planning, Industry and Environment Secretary's Requirements for SSD 35631707, in relation to CPTED considerations and associated public space design,
- (iii) Lane Cove Council's Development Control Plan, 2010, as amended (2016),
- (iv) the NSW Police Crime Prevention (Safer-By-Design) Checklist – Revision 2020.

We conclude that, subject to intentional application of CPTED measures throughout design development-detail documentation, the reviewed drawings support consent by the above State and Council planning instruments, as that consent relates to fulfilling CPTED conditions.

Overall CPTED Consultancy Assessment Summary

In the professional opinion of Harris Crime Prevention Services, the Home build-to-rent re development at 524 – 542 Pacific Highway St Leonards NSW, has considered, or will consider, CPTED Principles 1 to 5 and their application, as assessed by Harris Crime Prevention Services, from relevant referenced drawings and informing local and State planning instruments.

Incorporation of CPTED principles adheres to the State Government's 'social impact' and 'public interest' requirements, under Section 4.15 of the NSW Environmental Planning and Assessment Act, 1979, as amended, and with the Act's regulatory guidelines. Application meets the requirements of the Secretary, NSW Department of Planning, Industry and Environment.

The redevelopment also complies with requirements of Lane Cove Council's Development Control Plan, 2010 (amended 2016).

Our analysis and conclusions have been referenced against, relevant sections of the NSW Police Safer-By-Design (CPTED) Guidelines (2020).

The application of these principles, affirmed or recommended in this report, should be incorporated into design development and/or design detail, prior to 90+% sign-off.

Inter-disciplinary consolidation and incorporation of CPTED principles throughout the design process will achieve CPTED's inclusive objectives, to ensure the redevelopment's 'welcoming-and-safe-place' outcomes.

Harris Crime Prevention Services is also of the view that the proposed redevelopment should make a positive crime prevention contribution to Lane Cove Council's broader 'community safety' (crime prevention) objectives. The development's CPTED-applied architecture could 'showcase' future 'welcoming-and-safe-place' developments promoted and/or approved by the Council.

Crime Prevention Through Environmental Design (CPTED) Consultancy

in relation to

SSDA Application Number:	SSD-35631707
Project Name:	St Leonards Telstra Exchange Redevelopment
Location:	524-542 Pacific Highway St Leonards NSW
Applicant:	The Trustee for GFM Home Trust Subtrust No.2

THE REPORT

1 Engagement and Development Overview

Harris Crime Prevention Services (Harris) was engaged to provide a Crime Prevention Through Environmental Design (CPTED) consultancy to HOME for a mixed-use development (the Development or Project) located at 524-542 Pacific Highway, St Leonards NSW. It is set amongst mixed-use properties and close to St Leonards railway station and Royal North Shore Hospital and Gore Hill Oval.

This CPTED report is submitted to the Department of Planning and Environment (DPE) in support of a concurrent State Led Rezoning and State Significant Development Application (SSD-35631707) for the redevelopment, comprising build-to-rent housing, commercial and retail land uses.

The proposed redevelopment will specifically comprise the following:

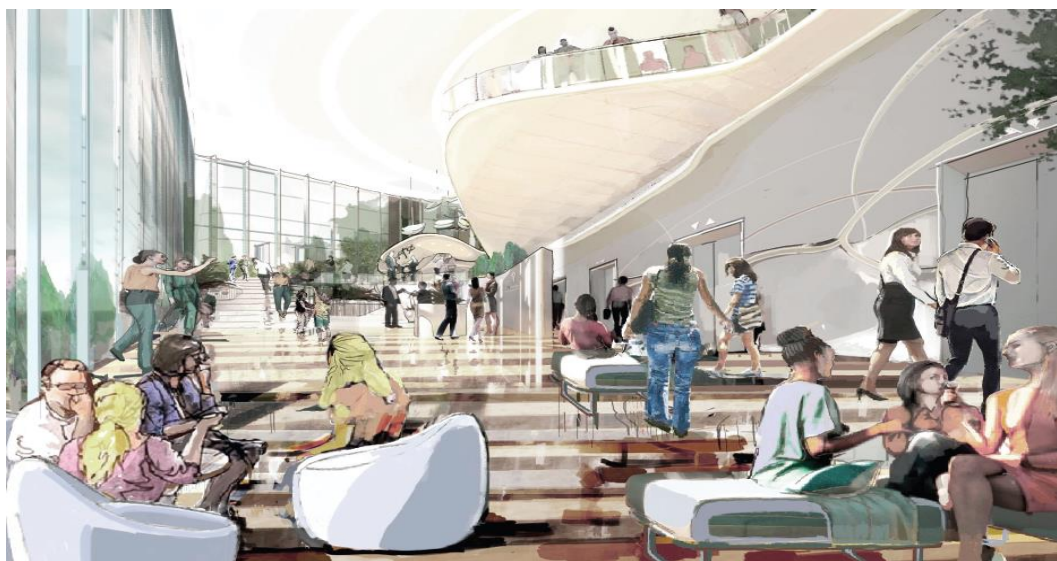
- 1 Site preparation and excavation,
- 2 Retention and integration of the existing Telstra Exchange Building,
- 3 Construction of a new 42-Level mixed-use development, comprising:
 - (i) 5,233m² of non-residential space up to podium,
 - (ii) 21,577m² of build-to-rent housing across 31 Levels, including 272 dwellings,
 - (iii) 10 x Key Worker housing units at L8 in lieu of commercial floor space,
 - (iv) 84 Short Stay accommodation units within the 8 Level commercial podium,
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- 6 Podium car parking and loading area with vehicular access via Christie Street, comprising a 48- space car stacker,
- 7 Associated landscaping and public domain works; and
- 8 Augmentation of, and connection to, existing utilities services as required.

This report addresses the relevant Secretary's Environmental Assessment Requirements (SEARs) and Study Requirements regarding Section 8 "*Address how Crime Prevention through Environmental Design (CPTED) principles are to be integrated into the development, in accordance with Crime Prevention and the Assessment of Development Applications Guidelines.*"

It is noted that to facilitate the abovementioned redevelopment, amendments to the Lane Cove Local Environmental Plan 2013 are proposed via a concurrent State Led Rezoning to rezone the site from B3 Commercial Core to B4 Mixed Use and to increase the maximum building height of 72m to 155m. The FSR of the site will remain as per existing at 17.1:1.

The consultancy team was required to:

- (i) assess the potential and actual crime risks to the redevelopment and
- (ii) analyse and recommend the application of CPTED principles to mitigate those risks.
- (iii) ensure that the build-to-rent architecture complied with the Planning Secretary’s Environmental Assessment Requirements – Section 8 (Refer this report Section 8.1)



Images 1 and 2 Home site and commercial entry statement - DKO Architecture

2 Report Structure, Scope, Outcomes and Stakeholders

2.1 Report Structure

The report is structured as:

- Section 1 engagement and redevelopment overview,
- Section 2 report structure, scope, outcomes and stakeholders,
- Section 3 CPTED aim, objectives and principles,
- Section 4 informing instruments and supporting documents,
- Section 5 local crime and crime risk intelligence and data,
- Section 6 assessed crime risks to the Development,
- Section 7 CPTED-applied principles for the development’s risk mitigation outcomes,

Section 8	compliance with legislation, regulation, planning and/or policy instruments,
Section 9	overall CPTED assessment summary,
Section 10	consideration of Crime Prevention Through Environmental Management (CPTEM),
Section 11	references, and,
Appendices	supporting Appendices, 1 and 2.

2.2 Consultancy Scope and Outcomes

The scope has addressed crime risk and crime prevention (CPTED) solutions to assist the design team in creating a 'welcoming-and-safe-place' for all users. The consultants have:

- (i) clarified with the architect/client regarding the redevelopment's crime risk parameters,
- (ii) considered local and State government compliance requirements,
- (iii) undertaken a day/evening physical inspection of the site and neighbourhood to better understand the redevelopment's relationship with its surroundings,
- (iv) reviewed drawings related to public/restricted areas, vehicle stacking, pedestrian lift foyers, building entrances, landscaping, lighting, signage, internal and external sightlines to enhance day-night observation and/or surveillance,
- (v) affirmed or recommended aspects of the building's design likely to assist in preventing crime including, spatial definition, natural and technical (CCTV) surveillance, access control,
- (vi) focused on the security of utilities and communications infrastructure, waste and storage areas,
- (vii) considered the impact of weather, climate variations and day/night comparisons on safe place form and function, and
- (viii) completed a Crime Prevention Through Environmental Design report.

Harris believes that the redevelopment should 'model' a welcoming-and-safe-place reputation which would:

- (i) enhance the architectural integrity and client objectives of the redevelopment,
- (ii) holistically protect all assets – people, property, systems and infrastructure,
- (iii) reinforce the site's implementation of site-wide CPTED design and management solutions;
- (iv) meet the expectations of secondary stakeholders, e.g. insurers, auditors,
- (v) comply with the specific requirements of Section 4.15 of the EPA Act and with the security (crime prevention) obligations of SEAR's, Lane Cove Council and NSW Police.

In our view therefore, it is critical the development embrace a whole-of-site CPTED philosophy, incorporating CPTED principles into its creative form and function.

2.3 Key Stakeholders

Key stakeholders are:

- (i) The Trustee for GFM Home Trust, Subtrust No.2,
- (ii) Lane Cove Council,
- (iii) NSW Government,
- (iv) DKO Architecture,
- (v) all users of the Development,
- (vi) NSW Police,
- (vii) adjacent 'neighbours' and broader St Leonards community.

While each stakeholder will have different community safety expectations, their broad expectations are similar in that personal and property safety is a 'given' of the designing-out-crime objectives.

3 CPTED Aim, Objectives and Principles

For all stakeholders, the (CPTED) aim is for the redevelopment to become a ‘welcoming-and-safe-place’. To achieve this aim, we identify three overarching CPTED objectives.

- Objective 1 To understand the crime risk context and identify potential and actual crime risks.
- Objective 2 To affirm and/or recommend (crime) risk mitigation through CPTED solutions.
- Objective 3 To ensure (CPTED) compliance with State and/or Council planning instruments.

Our report’s analyses, conclusions and recommendations are based on five acknowledge CPTED principles, adapted and applied by Harris from the ‘original’ Moffatt (1983) definitions and from strategies outlined in ISO 22341:2021, as:

- Principle 1 Territorial definition – clarity about spatial identify, separation, boundaries and purposes,
- Principle 2 Natural surveillance – architecture facilitating strong sightlines for ground plane, basement and/or upper-level observation and surveillance,
- Principle 3 Access control – access-egress definitions - who goes where, when and why,
- Principle 4 Activity support – the influences of (external) lighting, landscaping and signage,
- Principle 5 Target hardening – adding specific and robust architecture and technology.

CPTED-applied architecture aims to ‘block’ opportunistic or pre-meditated anti-social or criminal behaviour within the development footprint and its approaches. The ultimate crime prevention objective is to ensure ‘welcoming-and-safe’ reputational outcomes for all stakeholders.

Designing-out crime through the application of CPTED principles is an acknowledged crime prevention platform. Harris defines CPTED as ‘*applying aspects of architecture, engineering and technology to all urban development proposals (projects) as an intentional environmental crime prevention strategy*’.

4 Informing Instruments, Supporting Documents and the Harris Approach

4.1 Informing Instruments

Incorporation of CPTED (or similarly defined crime prevention design) into major (significant) development application documentation is requirement by most State governments and many local councils throughout Australia.

There are two international Standards applicable to CPTED strategies. One relates to generic risk management, the other relates to a global (CPTED Standard

4.1.1 State and Local Requirements

Our analyses, conclusions and recommendations are informed and/or underpinned by:

- (i) Lane Cove Council’s Development Control Plan, 2014, as amended, Part D,
- (ii) NSW Environmental Planning and Assessment (EPA) Act 1979, as amended,
- (iii) NSW Government, Planning Secretary’s Environmental Assessment Requirements, January 2022,
- (iv) NSW Police CPTED (or Safer-By-Design) guidelines; a ‘Check List’ Revision 2020,
- (v) NSW Bureau of Crime Statistics and Research (BOCSAR),
- (vi) NSW Police – contextual (verbal contact) crime risk intelligence/information.

The Development’s compliance with, or reference to, these instruments is covered in **Section 8**.

4.1.2 International Standards

Our analysis and report is also underpinned by two International Standards:

- (i) ISO 31000:2018, *Risk Management Guidelines*, which provides a helpful framework to identify and manage any organisational risks, include crime risks, and
- (ii) ISO 22341:2021 *Security and Resilience – Protective Security – Guidelines for Crime Prevention Through Environmental Design*, providing a global CPTED framework.

4.2 Supporting Documents

The report has two (supporting) appendices:

- Appendix 1 NSW Bureau of Crime Statistics and Research (BOCSAR) - reported crime statistics for St Leonards over five years, April 2018 to March 2023.
- Appendix 2 The Risk Management Standard ISO 31000:2018 (the Standard) and its relevance to the Development's crime risk assessment.

4.3 The Harris Approach

The Harris approach to crime prevention design and management incorporates aspects of architecture, engineering and technology which underpins a 'welcoming-and-safe-place' objective.

This approach seamlessly welcomes, defines, guides, directs, encourages, regulates activity and appropriate functional objectives. Safe place design outcomes seek to override opportunistic and deliberate anti-social and criminal behaviour.

Harris defines 'welcoming and safe place' as: *'built form and public space environments where crime prevention has been a consideration of concept, master-planning, design development and construction processes and where safe place outcomes enhance a community's overall reputation'*.

4.4 Notes and Disclaimer

Note 1 Harris' consultancy services are provided independently; i.e. we are *not* affiliated with, nor receive benefits from, any organisation that supplies security hardware, installs security systems, monitors alarm systems or provides guarding/patrol services. This independence is critical to the way we approach security solution options and recommendations.

Note 2 The scope excluded the development/provision of a technical security brief, security systems design and specifications or lighting brief and specifications.

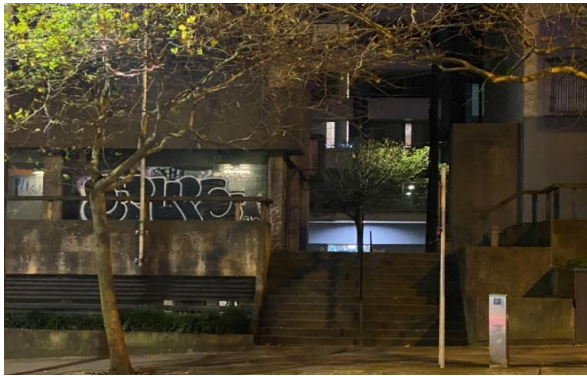
Note 3 The commentary, assessment, conclusions and recommendations outlined in the report are based on information provided to Harris Crime Prevention Services at the time of this assignment.

Disclaimer: While our research and experience suggest CPTED can be adopted to reduce opportunities for crime, it is not possible to guarantee that actual crime will be reduced or eliminated if these suggestions and/or recommendations are implemented.

5 Local Crime Risk Context, Police Intelligence and Crime Data

5.1 The Context and Crime Risks

The development site is located alongside the high vehicle and pedestrian traffic volume, the Pacific Highway, especially during daylight hours. Addresses surrounding the footprint are undergoing developmental renewal. Currently however, there are streetscapes and premises with evidence of neglect and/or damage, identified by anti-social or criminal incidents.



Images 3 – 6 existing premises surrounding the development evidenced by neglect and damage - Harris

As the area along the Highway and around St Leonards station is rejuvenated, the evident premises profiles will positively change and will generate a new sense of crime prevention stewardship.

5.2 Local Police (Crime Risk) Intelligence

We have spoken with the Crime Prevention Officer (CPO), Chatswood Police who agrees that the context is not considered a crime 'hot spot' with no special vulnerability, other than reported anti-social behaviour mainly occurring on weekends and/or at night and mainly linked to street disturbances and/or licenced premises.

Our assessed risks, CPTED analyses, conclusions and recommendations are 'realistic' given the CPO's comments, BOCSAR data and our familiarity with the development's context.

5.3 NSW Bureau of Crime Statistics and Research (BOCSAR) Data

BOCSAR data of reported crime for St Leonards backs police and our contextual assessment.

The data is published to indicate trends in various offence categories over a 5-year (year-on-year) period. **Appendix 1** details the latest data. In summary, there have been overall stability in the reported crime categories; no increasing trends or patterns to cause increased community concerns.

However, there are some (reported) crime categories for the suburb that remain high year-on-year. The consistently highest categories are:

- (i) domestic assaults,
- (ii) non-domestic assaults,
- (iii) intimidation stalking and harassment,
- (iv) break and enter dwelling,
- (v) steal from dwelling,
- (vi) steal from motor vehicles,
- (vii) disorderly conduct,

- (viii) drug offences,
- (ix) malicious damage to property, and,
- (x) prohibited and regulated weapons offences.

Over the 5 years, these 'raw' numbers have fluctuated but with little published information as to fluctuation causes or the locations of reported offences. The concerning categories may reflect in part, post COVID out-and-about 'freedoms'. Overall, most categories are listed as 'no change' or 'stable'.

6 Assessed Potential and Actual Crime Risks Impacting the Redevelopment

While many of the BOCSAR categories and offences coming under police investigation, occur in public spaces, there are still risks to public and private property, to and around the redevelopment.

Predicting when, where, what, how and why risks can become threats and incidents targeting the development footprint, may be influenced by factors such as:

- (i) the surrounding context's potential to 'attract' opportunities for anti-social or criminal behaviour,
- (ii) time of day or night and weather conditions for such opportunities,
- (iii) the emotional 'state' and motive of a person intending to commit an offence,
- (iv) the intended targets – people and/or property, and
- (v) how easy or difficult it is to unlawfully gain access to targets.

6.1 The Harris-Assessed Contextual Crime Risk Summary

The assessed crime categories, their risks and incident likelihood, should not be underestimated. This is not to alarm but to caution against mitigation complacency and to direct mitigation opportunities in the first instance towards CPTED solutions.

Anecdotal understanding, site knowledge, local police intelligence and BOCSAR data confirm common (and mostly predictable) crime categories likely to 'target' the development.

Assessing *potential* risks, levels and incident likelihood of the following categories must always be balanced against the possible '*consequences*' of breaches and *actual* criminal threats or incidents.

Even the most *minor* offence occurring within or near buildings, communal or public spaces and on surrounding streetscapes can have *major* consequences. Hence the need to address each crime category as having potentially serious consequences.

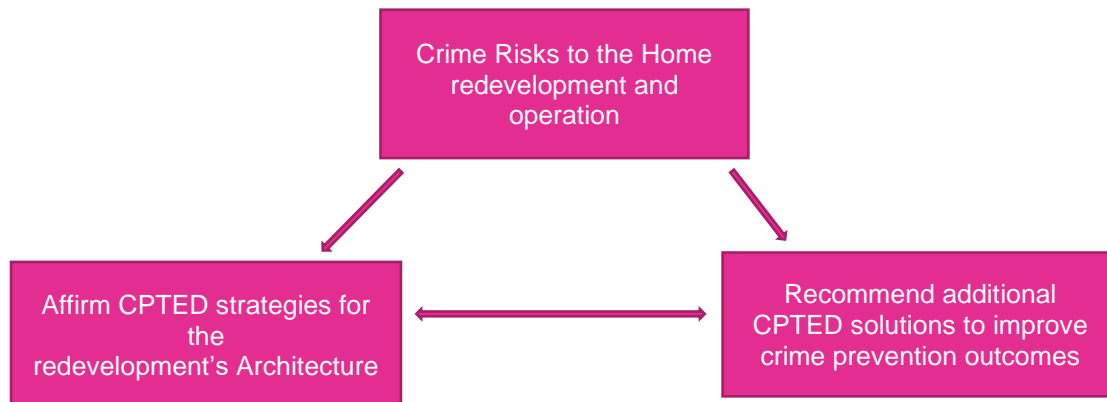
Our assessment is based on risk-to-incident likelihood for all categories: 'low' (**L**), 'moderate' (**M**), 'high' (**H**) and 'extreme' (**E**). (Appendix 2 provides an illustrative crime incident matrix, adapted from Standard ISO 31000:2018, *Risk Management Guidelines*).

Risks and likelihood of categories (i) to (vi) occurring are assessed as

- (i) intimidating anti-social behaviour targeting residents, visitors or contractors, (**L**) - (**M**),
- (ii) physical and/or sexual assaults against the (i) above categories, especially at night, (**L**),
- (iii) unauthorised access to premises and theft of property, (**L**),
- (iv) damage to buildings, facades, mailboxes, vehicles, infrastructure, landscaping, signs, furniture, fixtures and fittings, (**L**),
- (v) theft of personal or common property and/or theft from, or of, motor vehicles, (**L**) - (**M**)
- (vi) contextual drug possession, and drug dealing. (**M**)

There are two other potential categories. They are not likely to occur but have significant consequences if they do.

- (vii) arson or explosion(s), (**L**)
- (viii) injury or death to persons, damage to, or destruction of, property, from targeted and potentially, gang or terror-style attacks, (**L**).



7 CPTED Applications to Ensure ‘Welcoming and Safe Place’ Outcomes

7.1 CPTED Principle 1 Territorial Definition: clarity about spatial identity, separation, boundaries and purposes

Generic Explanation

Defining territorial boundaries, spatial separation and purposes are the elements of this first CPTED principle. The aim is to maximise built form and public domain ‘knowledge certainty’ for all who have day-night access to a site.

Stakeholder, occupant, visitor or contractor knowledge (identification) of territorial sub-spaces increases destination and circulation confidence; (for example, design of mixed-use spaces including, building entrances, public, communal, sporting, retail, commercial, residential, industrial, social gathering, wayfinding and vehicle access spaces).

When spaces become clearly defined collective ‘places’, form and function are easily identified. This removes confusion of purpose, enhances safe circulation and maximises alertness to any surrounding risks or threats.

7.1.1 Application: Overall Footprint Definition

The site fronts the Pacific Highway and Christie Street with a thru site link on (otherwise) private property, as part of ground plane wayfinding, circulation and social gathering links to surrounding built form.

Our assessment of the overall footprint is that (a) the design of built form and associated ground plane spaces provides the foundation for site knowledge certainty and (b) the various sub-site spaces contribute to this overall certainty.

In our opinion, the interconnected (integrated) nature of the development ensures whole-of-site clarity of purpose through well-defined spatial separation and overall legibility. CPTED ‘looks for’ this clarity.

Design development of this important welcoming-and-safe’ ground plane element and its features will determine the application of, and relevance to, natural surveillance, access control, lighting, landscaping, signage and target hardening measures – as per the remaining CPTED principles.

Relationship to street frontages presents definitional built form clarity. This clarity should continue in design development to ensure 'safe' linkages between ground plane circulation and proposed public domain spaces. The vertical village concept defines level-by-level spatial purposes and separation, without ambiguity.

7.1.2 Application: Street Frontage Perimeters

Perimeters are clearly defined either as street frontages, or as boundaries with neighbouring properties. Specifically, drawings indicate:

- (i) all street and neighbouring property boundaries,
- (ii) inviting commercial and residential 'entry statements',
- (iii) clearly defined retail footprint,
- (iv) perimeter potential for natural and technical surveillance,
- (v) respect for adjacent property privacy, and
- (vi) design deterrence and/or prevention of unauthorised access.

From a CPTED perspective, the site's boundary lines reflect the future of a rejuvenated surrounding 'mixed use' neighbourhood. The street frontages clearly denote each boundary, minimising the likelihood of unobserved unlawful access.

Street-fronting facades and the 'entry statements' will comply with the Secretary's and Council's intentions to define and welcome residents, tenants and public users of the site, emphasising an inviting safe and neighbourly presence.

7.1.3 Application: Spatial Separation and Foreshadowed Purposes

There is no evident spatial separation confusion in terms of internal or external usage definitions. Vehicle and pedestrian off-street entry points are clearly defined. This makes for generally safe wayfinding attractiveness.

External landscaping design is a critical element in relation to interconnecting public domain within, and external to, the site.

The redevelopment's contribution to the public domain concept and/or master planning of the safe and inviting pedestrianisation of the railway precinct should be significant in the progressive design of that precinct.

7.1.4 Application: Ground Floor Definitions

Drawings indicate no definitional ambiguity as to the location of the (Christie Street) residential entry. There is intentional open design of the residential reception-lobby. All lifts are clearly visible, as is the workstation and secure bin holding area. This certainty optimises, and authorises access to, designated (secure) zones, optimising safe wayfinding.

The vehicle entry is similarly clearly defined. The from-street approach and ramping options are spatially unambiguous, leading either to stackers or the loading bay.

There are no apparent internal built form 'hidden' spaces in the reviewed drawings, likely to conceal or entrap, within the site on this level.

7.1.5 Application: Basement 01

The basement contains fully secured plant, bulky and general waste storage rooms, water and fire booster equipment and lift cores, all accessed by authorised personnel only. There are no outstanding CPTED issues from the supplied drawings.

7.1.6 Application: Level 1

Level 1 is the commercial 'entry statement', leading also to café – retail tenancies, clearly identified in spatial usage terms. The level provides for designated secure retail and commercial bicycle storage, a library lounge area, mail room, office and staff areas. End-of-trip amenities, lift lobbies, communal laundry and back-of-house plant rooms are also identified as secure locations, continuing the 'knowledge certainty' theme.

7.1.7 Application: Levels 2 and 3

These multi-purpose levels demonstrate spatial identity which, from a CPTED perspective, highlights essential wayfinding certainty for safe intra-circulation. Level 2's flexible work hubs, dining, kitchen, boardrooms and lounge area are authorised 'safe spaces'.

Level 3 commercial GFA is the lower level of the 84 Short Stay Accommodation [STA] units and exhibits safe definitional spaces in the design and fit out.

7.1.8 Application: Levels 4 to 7

These levels indicate clear separation between commercial and residential spaces, including defined balcony and building setbacks. The commercial GFA awaits tenancy fit-out clarity.

As for Level 3, Levels 4 to 7 are dedicated to STA units and exhibits safe definitional spaces in the design and fit out.

On these levels, commercial GFA is accessed by secured lifts, typical of all upper levels including the residential elements. Plant and/or comms rooms are similarly secured.

7.1.9 Application: Levels 8 and 9 Amenity

Level 8 is now 10 Key Worker Housing apartments that will have access to L9 amenity areas.

Level 9 identifies as a vertical village recreational (wellbeing) element. Each space has definitional clarity and requires no additional purpose interpretation. The central lift lobby and signage will 'guide' unfamiliar users to each zone.

7.1.10 Application: Levels 10 to 40

Residential, communal and recreational spaces 'mix' with residential apartments. Each space has clear, unambiguous spatial definition.

7.1.11 Application: Initial Internal Pedestrian and Vehicle Circulation

Ground and lower ground circulation to commercial, retail, residential, plant, storage and waste zones are diagrammatically indicated to and from entries, lifts and stairs. As mentioned above, corridor wayfinding is definite as are the various (internal) secure access points.

Vehicle entry and turntable-to-stack movement is securely controlled and there are no apparent 'blind spots' causing concealment or entrapment concerns.

From a CPTED perspective, it is important to minimise the street-to-basement ramping distance and to ensure, where possible, strong street-to-entry sightlines. This reduces the temptation to tailgate and be unobserved. The objective is to deter unauthorised pedestrian or vehicle basement access.

We understand that all vehicles be authenticated prior to entry and stacker 'waiting' zone.

7.1.12 Application – General Storage, Waste Storage and Collection

There is defined general, bulk and waste storage. It is important to clarify who has access to what, in storage terms. Once defined, procedures for waste storage and collection must be strictly followed by residents, tenants and contractors to ensure there is no unauthorised access to these zones.

General, bulk and waste locations should be protected by fire detection and suppression systems.

7.1.13 Application – Utilities Infrastructure and Other Plant

Protecting plant and infrastructure is critical. We note and support the secure location of electrical and mechanical plant rooms. The fire sprinkler and hydrant pump rooms are also appropriately located and secured.

CPTED Principle 1 Territorial Definitions Conclusions and/or Recommendations

The HOME redevelopment drawings display definitional design clarity. In CPTED terms, there are no ambiguously allocated spaces or confusing spatial purposes. Intra-site spatial separation is readily identified within the 01 basement, ground, lower ground, mezzanine and upper levels.

There is street-fronting and perimeter (boundary) clarity. Clearly identified built form locations, layout and spatial separation ensures contextual 'knowledge'.

As a result, vehicle wayfinding to stackers, loading and unloading zones is appropriately designed. Pedestrian wayfinding is characterised by safe invitational destination clarity throughout the tower, but particularly at entrances, communal and private spaces across all levels and within the ground plane public domain.

Definitional clarity will enable and encourage safe time-determined informal legitimate foot traffic circulation and activation through the site.

This broad definitional clarity provides a foundation design statement, upon which to overlay Principles 2 to 5, as part of an integrated 'welcoming-and-safe-place' whole.

In our view, there are no other obvious CPTED-related definitional impediments.

The (combined) definitional elements present a coordinated and integrated 'whole', supporting the redevelopment's marketing and security objectives. In turn, these objectives should mean an overall 'safe place' reputation – one which will be sustained, in part, by the commitment of residents and tenants to on-going stakeholder (security) stewardship.

7.2 CPTED Principle 2 Natural Surveillance: architecture facilitating informal observation

Generic Explanation

The principle of natural (aka informal or casual) surveillance encourages (i) the observation of built form and public domain spaces and purposes by user/stakeholders and (ii) the observation and notation within or around spaces of usual or unusual activity and behaviour, potentially (or actually) leading to anti-social or criminal threats and incidents.

Natural surveillance is purposeful observation. Maximum surveillance impact requires sightline certainty, facilitated by clear proximate-distant and longitudinal-latitude fields. The aim is to know who or what is within a surveillance field and to observe specific unlawful action or intent.

Legible and permeable architecture should ordinarily promote natural surveillance in and around clear reference fields. CPTED surveillance-focused architecture adds a crime prevention 'layer' to legible and permeable circulation and activation creativity.

7.2.1 Application: On-site and On-Street (Ground Plane) Surveillance

Sharp, interconnected ground plane sightlines are the key to maximising effective natural surveillance towards, and away from site approaches and entrances to the public-communal and private mix of pedestrians and vehicles accessing the site.

Drawings indicate there are appropriate opportunities for proximate and distant (uninterrupted) sightlines to maximise observation of anti-social or more serious suspicious behaviour along boundaries, built form, the proposed thru site link and around nearby public domain spaces.

Entrances to commercial, residential, retail, vehicle parking and contractor spaces are observable at approaches and, subject to design development, within as-purposed front and back-of-house zones.

The collective natural surveillance solutions provide lower and ground level natural surveillance 'positives'. This is due to:

- (i) the multi-purpose nature of ground plane activation,
- (ii) the encouragement of stakeholder and public access 'mix', especially in communal (vertical village) spaces,
- (iii) intended day-night pedestrian and vehicle traffic circulation and activation to and through the ground planes, leading to upper-level mixed uses, in line with the 'vertical village' objectives.

Proximate ground plane and streetscape sightlines are strong, enhancing opportunities to note, record and/or report suspicious anti-social or crime-related behaviour. Context, access purpose and opportunity are critical elements in maximising natural surveillance at these levels.

Distant sightlines to the site will come from the contextual foot and vehicle traffic. There are no obvious contextual recesses or blind corners which might lead to concealment or entrapment.

7.2.2 Application: Upper-Level Surveillance

The 'spread' and day-night consistency of pedestrian circulation and activation will permit varying opportunities of upper-level surveillance, depending on access definitions, especially where there is mixed recreational amenity.

There will be some (but limited) opportunity to encourage retail, commercial podium and residential balcony and 'window' surveillance to the streetscape and/or ground plane public domain gathering spaces, (Observation from higher levels generally provides diminishing surveillance returns.)

In summary, definition + strong sightlines at and around ground and lower ground plane spaces will facilitate the day-night 'eyes and ears' awareness by observing the usual and unusual.

(Note: In our experience and from scholarly research, legible and permeable ground plane surveillance has the following advantage, evident in this design:

- (i) Sightlines are at eye level facilitating proximate and distant surveillance.
- (ii) The hearing range is closer meaning incidents are more likely to be sight-sound identified, even when there are contextual distractions.
- (iii) There is a sense of context – the observer and/or hearer is usually within or near the same space and is 'drawn' to any unusual or disturbing behaviour.
- (iv) Contextual eyes-and-ears surveillance may cause a 'no response' and/or withdrawal from involvement, while retaining memory of what was seen or heard when later prompted.
- (v) There are many examples of individuals or groups physically responding to, and/or reporting on-street or in premises threats or incidents.
- (vi) Night-time on-street person and property surveillance is still effective due to retaining same-plane visual and aural (audible) cues.)

7.2.3 Application: Vehicle Parking and Loading Docks

Principle 1 affirmed the development's definitional design to promote safe, casual and purposeful vehicle approach points, and stacker access. Surveillance of the vehicle zones is therefore enhanced.

CPTED Principle 2 Natural Surveillance Conclusions and/or Recommendations

The redevelopment's overall design elements promote multi-angle proximate and distant sightlines throughout the site. Internal and external (public domain) ground plane surveillance opportunities are strongest.

Reviewed drawings indicate ample opportunity for natural (passive) observation and surveillance:

- (i) within ground and lower ground plane reception and public spaces,
- (ii) along boundary and surrounding contextual streetscapes,
- (iii) approaching, and at, commercial, residential, retail and vehicle entrances,
- (iv) within designated public, communal and private spaces across all levels,
- (v) at internal vehicle stacking and loading-unloading zones,
- (vi) at and around reception, lounge areas, lift lobbies, and
- (vii) approaching, or at, internal plant-infrastructure and storage rooms.

Multi-angle, proximate-distant sightline opportunities should significantly enhance risk mitigation, including deterring unauthorised pedestrian and vehicle access or unusual (suspicious) behaviours within or around the redevelopment footprint.

However, reliance on the effectiveness of casual observation and/or intentional surveillance above mezzanine and throughout upper-levels may not add to overall surveillance effectiveness.

Notwithstanding these minor constraints, we conclude that current drawings maximise internal and external natural surveillance objectives; that is, to generate whole-of-site surveillance opportunities to deter and/or prevent unauthorised entry, damage to property and/or harm to all stakeholder-users.

7.3 CPTED Principle 3 Access Control: who goes where, when and why

Generic Explanation

Access control is a consequential extension of defining territory (Principle 1) and natural surveillance (Principle 2). Open and/or restricted access must be: (a) readily identified through the appropriate built form (approach) architecture, (b) supported by physical and electronic access control systems (pacs) and (c) able to prevent and/or identify unauthorised access.

7.3.1 Application: General Access Control

There are four areas to consider.

- (i) access to commercial and retail tenancies and residential apartments,
- (ii) access to back-of-house plant, storage and utilities infrastructure,
- (iii) access to ground plane and vertical village recreation and social gathering spaces on designated levels,
- (iv) access to vehicles for parking, loading, maintenance and emergencies.

Design development should reveal a coordinated architectural and systems approach to manage each of these zones and their purposes.

7.3.2 Application: Fire Stair Access

All fire stairs should be restricted to egress only and localised door-open-too-long (DOTL) alarms be installed to alert a breach of this restriction. All fire stair exit doors should be under camera surveillance and be appropriately lit.

7.3.3 Application – Access to Mailboxes

We note the secure location of the mailbox room. (The NSW Police CPTED ‘check list’ recommends securing mailboxes should be a priority as stolen mail is becoming an increasing concern, leading to identity ‘theft’.)

7.3.4 Application: Vehicle Access

Vehicle access and stack-parking will be strictly controlled. Drawings indicate appropriate circulation along loading and unloading ramps, including waste removal docking.

7.3.5 Application: Contractor Access

It is imperative that all maintenance, loading and waste removal contractors be vetted prior to gaining access to (a) the building and (b) specific locations within the building. This is a high profile and, in one sense, a highly vulnerable development. From a security (crime prevention) perspective, protocols must protect all internal delivery and removal zones. Contractors and other drivers continually change but protocols, once established, should apply no matter how ‘familiar’ or regular drivers might be.

CPTED Principle 3 Access Control Conclusions and/or Recommendations

Access control technology and procedural (operational) protocols are keys to ensuring the redevelopment’s ‘welcoming-and-safe’ place reputation. It is therefore essential that:

- (i) all physical and electronic access control systems be monitored and maintained to ensure performance capability, and
- (ii) access control policies, procedures, protocols and practices be developed and strictly followed.

It is also important that these be fully understood and complied with, by all.

The security and controlled access of plant and storage rooms must be a design development priority. We recommend that video intercom technology be specified for all residential apartments as pre-access identification. Contractors accessing all site zones should have to produce some form of identification prior to granting entry to the tower and relevant zones.

7.4 CPTED Principle 4 Activity Support: influences of (mainly external) lighting, landscaping and signage

General Explanation

Activity support applies (external) lighting, landscaping and signage architecture to a footprint’s form and function design, ‘supporting’ definitional clarity, passive and technical surveillance and access control (Principles 1 to 3).

External (and where appropriate Internal) Lighting should reflect ‘purpose’ consistency: wayfinding, destination, social gathering and decorative-aesthetic. Each requires differing luminarie styles, lighting types, spread, throw, spill, wash and lux levels, to accord with lighting Standards and architectural briefs.

CPTED lighting applications can (should) often exceed those Standards and briefs so as to highlight spaces and circulation - activation 'corridors'.

Differential lighting should avoid cross-over colour (temperature) clashes to enhance surveillance identification of property and people. All external lighting should optimise sightline legibility, to facilitate proximate-distant wayfinding and destination confidence.

Landscaping should combine aesthetics and purpose with an intent to prevent concealment or entrapment.

Signage supports wayfinding and destination certainty, access limiting (controlling), warning and emergency awareness. It should have day-night visual impact

7.4.1 Application: External and Internal Lighting

External lighting is a critical 'support' for the development's 'welcoming and safe place' objective to support surveillance sightlines in and around ground plane public domain and perimeters.

External lower and ground plane lighting specifications as to style, temperature, throw, spill and wash, should be considered in conjunction with Council's roadway and pathway lighting, particularly where Council is planning to expand pedestrian connectivity with new integrated public space.

Luminaire and colour choices should maximise night-time surveillance. Shadowing or lighting clashes may compromise surveillance and safe way-finding effectiveness.

Note: LED lighting is assumed for public domain areas. Where possible overhead lighting for wayfinding should be specified. We suggest (+ -) 4000 Kelvin, as the most appropriate colour temperature to maximise proximate and distant observation (surveillance) and, where necessary, identification. The white-natural light spectrum around 4000 Kelvin has advantages over blue, orange or yellow colour output. Yellow, orange and blue renditions distort natural colour profiles and features. White light installations strengthen contrasting colours and identify individual (personal) features more distinctly.

It is also critical that external and internal lighting focus on vehicle entry, exit, internal movement ramps, the stackers, turntables and all back of house loading, unloading and maintenance access points.

Internal lighting for welcome foyers and lift lobbies should complement, rather than clash with, external lighting.

In our experience, bollard, wall-mounted and other forms of up lighting or low height spherical luminaires should be avoided, both for wayfinding and lighting pocket gathering spaces. They create glare and tend to interrupt sightline or wayfinding certainty. Bollards are also prone to damage (including vandalism) and can often be 'buried' by mid height plantings, should these be specified.

7.4.2 Application: Landscaping

Landscaping will support the attractiveness and surveillance safety of the ground plane movement and activation. Mature plantings for street-to-site interface and on vertical village levels should avoid opportunities for concealment and entrapment around public domain and internal communal spaces.

7.4.3 Application: Signage

Signage throughout and around the site, should be colour coordinated, legible and visually 'readable' to cater for human height differences and should be disability inclusive. International pictorial signage is an option. Ideally, public domain signage provided by the developer, should follow Council's signage protocols.

Regular users of the site will soon become familiar with signs and their purposes. However, casual, or first-time visitor-guests to the site, will find visually attractive directional (wayfinding) and destination signage helpful and less confusing. Emergency and warning signs will be specified as per BCA codes.

CPTED Principle 4 Activity Support Conclusions and/or Recommendations

CPTED relevant lighting aims to:

- (i) illuminate the redevelopment site footprint, perimeters and surrounds with (preferably) overhead luminaires for the public domain to improve night-time wayfinding and surveillance,
- (ii) avoid colour inconsistencies (clashes),
- (iii) increase minimum lux levels along lightingvulnerable internal back-of-house zones including the stackers, loading and unloading zones, lift lobbies and approaches to storage and plant rooms,
- (iv) support (night-time) surveillance at, and as 'spill' throughout the site, hopefully in colour temperature 'step' with Council's street and public space LED lighting initiatives,
- (v) highlight pedestrian and vehicle entry points,
- (vi) provide wayfinding certainty through the link, to strengthen whole-of-site night-time natural surveillance,
- (vii) provide consistent non-movement activated lighting in the basements, at high illuminance to eliminate low light or 'no light' opportunities for concealment or entrapment.

We recommend recessed, targeted and where practicable, overhead LED luminaires (+ - 4000 Kelvin) for the 01 basement, including for the entrances, lift lobbies and public domain wayfinding.

Luminaires should be sufficiently beam-angled to maximise throw, spill and (where appropriate) wash, eliminating basement shadowing and dark gaps.

Bollards should not be considered for any external lighting within the redevelopment.

Landscaping should:

- (i) eliminate possible concealment or entrapment within or around plantings,
- (ii) deter opportunities to climb mature plantings to breach mezzanine or other upper-level balcony security, and
- (iii) maximise ground plane sightline continuity,

Signage should consider first-time casual visitors and contractors. All signs should be disability inclusive. Strategically selected signage should be back-lit to improve legibility and wayfinding. Pictorial signs should be considered.

Inter-disciplinary coordination of these three 'support elements' is essential to enhance the overall safety (security) of the redevelopment. Design development should detail inter-disciplinary solutions.

7.5 CPTED Principle 5 Target Hardening: adding specific and robust architecture and technology

Generic Explanation

Target hardening is often called 'situational' crime prevention. It aims to reinforce other CPTED principles and to proactively 'strengthen' form, infrastructure, structures, fixtures, fittings and furniture in and around identified vulnerable spaces. Target hardening design is an added crime risk defence layer.

Design measures aim to increase the efforts intending offenders must expend attempting to damage property and/or harm or injure people.

Target hardening can apply additional physical, mechanical, structural and electronic treatments to deny or limit access. Electronic alarms or surveillance cameras are the more common target hardening measures. However, the Principle's design goal is to avoid place 'fortressing'.

7.5.1 Application: CCTV (IP Network) Coverage

Camera surveillance around the perimeters, the public domain, stacker lobby, loading, contractor and other vulnerable back-of-house circulation should be considered at design development. The aim is to present a coordinated 'real time' (or stored image) monitoring to maximise response times in the event of security threats and/or incidents.

While surveillance technology is not primarily a preventative option, it is useful to deter, detect and identify in key (vulnerable) locations, for example focusing on vehicle entry and exit points.

Locating camera surveillance facing plant, storage, other infrastructure rooms, lift lobbies and fire stair doors is essential.

Video intercom technology should be specified for all lift lobbies and apartment entries. The feasibility of implementing a whole-of-site security camera system should be explored during design development-detail.

7.5.2 Application: Help Points

Help points alert security or emergency staff to unexpected situations, often at lift lobbies and basement or upper-level parking. In this instance, they may be helpful where residents or tenants undertake car retrieval and/or where vehicles are moving through internal ramping/loading spaces.

7.5.3 Application: Building Facades and Public Domain

Building facades are prime targets for 'tagging'. (Our contextual visit confirmed nearby premises as tagging targets). While no masonry coatings can guarantee protection from graffiti damage, we recommend design development investigation of the latest protective material, and/or coatings to minimise likely defacing of the masonry areas. Public domain furniture should be similarly coated.

CPTED Principle 5 Target Hardening Conclusions and/or Recommendations

We recommend targeted IP Network (CCTV) camera surveillance of the redevelopment footprint's, vulnerable spaces, covering:

- (i) commercial, residential, retail and vehicle entrances,
- (ii) the 01 basement,
- (iii) plant, infrastructure, loading and unloading zones,
- (iv) lift lobbies,
- (v) relevant areas of the public domain.

Designated camera locations aim to deter opportunities for concealment or entrapment and assist with authorised access identification.

Video intercommunication technology should be installed at each apartment to identify visitor-guests and maintenance contractors.

Anti-graffiti coatings are recommended for all ground floor (level) masonry finishes and to other identified vulnerable facades.

From a crime prevention perspective, the above treatments are not 'invasive'. We believe that design development drawings can specify combination solutions without creating a sense of fortressing.

8 Informing Legislation, Policy and or Planning Instruments: Compliance

8.1 NSW Government – Planning Secretary’s Requirements – SSD-35631707

The Planning Secretary’s Requirements of January 2022 stated (Section 8) that the development must... *“Address how Crime Prevention through Environmental Design (CPTED) principles are to be integrated into the development, in accordance with Crime Prevention and the Assessment of Development Applications Guidelines.”*

These are the Guidelines set out in the 2001 gazetted regulations of the Environmental Planning and Assessment Act, 1979, as amended. The Guidelines are derived from Section 4.1.5 (1) of the Act, addressed hereunder. Our assessment concludes that the Guidelines requiring application of CPTED principles to this mixed-use development, have been, or will be, followed during design development.

In conjunction with the above directive, the Secretary required the developer to... *“demonstrate how the development maximises the amount, access to and quality of public spaces (including open space, public facilities and streets/plazas within and surrounding the site), reflecting relevant design guidelines and advice from the local council and the Department.”*

In particular, how the development... *“ensures that public space is welcoming, attractive and accessible for all, maximises permeability and connectivity, maximises the amenity of public spaces in line with their intended use, such as through adequate facilities, solar access, shade and wind protection, maximises street activation and minimises potential vehicle, bicycle and pedestrian conflicts.”*

8.2 Environmental Planning and Assessment Act, 1979 (as amended)

Consideration of crime prevention for mid to large scale developments in New South Wales derives from Section 4.15 (1) (b) and (e) of the NSW Environment Planning and Assessment (EPA) Act, (as amended).

The Act allows provision for State and local government instruments to regulate or codify issues pertaining to the evaluation of environmental impacts of developments. Social *“impacts”* (b) and *“the public interest”* (e) fall within this Section. Under the heading ‘Evaluation’, Section 4.15 (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:

- (b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,*
- (c) the suitability of the site for the development,*
- (d) any submissions made in accordance with this Act or the regulations,*
- (e) the public interest.”*

In the case of ‘green’ or ‘brown’ field developments, interpretation of *“the public interest”* includes stakeholder proponents, post-development occupants and, by extension, the wider community.

Local Government authorities in NSW are required to consider the various impacts within S.4.15 when evaluating developments. Councils recognise the importance of mitigating anti-social and criminal behaviour within their constituencies. Many have incorporated the CPTED framework into Development Control Plans and/or Crime Prevention Plans, requiring crime prevention considerations as a specific development consent condition.

The *public interest* interpretation aims to ensure CPTED-relevant architecture creates and promotes ‘safe place’ outcomes, i.e. to prevent anti-social and/or criminal behaviour which could put at risk people and property associated with a new development footprint.

Ordinarily, the *public interest* is limited to a development footprint. However, public space approaches to, or ‘edges’ of a development’s surrounds, may be considered as an extension of the social and public interest impacts (S.4.15 (b) and (e)).

In our opinion, the proposed development has considered the “social” and “public interest” requirements of this Section and the 2001 regulatory CPTED Guidelines.

8.3 Lane Cove Council

8.3.1 Development Control Plan (2010), Amended 2016

In Part B of the DCP, Council has specified: “*For large scale retail, commercial, motel and Senior’s Living development with a GFA of over 5,000m², provide a ‘Safer by Design’ assessment in accordance with the Crime Prevention Through Environmental Design (CPTED) principles.....*”

B.8 of the Plan’s ‘General Controls’, under the heading ‘Safety and Security’, states the following. Relevant developments require; “*A safe and secure environment (which) encourages activity, vitality and viability, enabling a greater level of security.*”....“The objectives of safety and security are to:

- (i) *address safety, security and crime prevention requirements in the planning and design of development,*
- (ii) *reduce opportunities for crime through environmental design and the provision of natural and technical surveillance opportunities,*
- (iii) *(c) control access through the provision of physical or implied barriers which can be used to attract, channel or restrict the movement of people,*
- (iv) *implement territorial reinforcement by encouraging community ownership of public space,*
- (v) *promote space management by ensuring that public open space is effectively utilised and maintained,*
- (vi) *ensure that the building design allows for casual surveillance of access ways, entries and driveways.*
- (vii) *avoid creating blind corners and dark alcoves that provide concealment opportunities in entry areas, pathways, stairwells, hallways and car parks,*
- (viii) *provide a clear line of sight between one public or communal circulation space and the next,*
- (ix) *provide entrances which are in visually prominent positions and which are easily identifiable, with visible numbering,*
- (x) *provide adequate lighting of all pedestrian access ways, parking areas and building entries,*
- (xi) *provide security access controls where appropriate.....”*

8.4 North Shore Police Area Command – CPTED Check List

We have discussed our assessed crime risks to the development (**Section 5.2**) with the Crime Prevention Officer (CPO) attached to North Shore Police Area Command (at Chatswood Police Station).

Drawings have been reviewed to ensure that relevant items of the revised police CPTED (or Safer-By-Design) ‘Check List’ have been considered by the developer and, where appropriate, complied with in applying CPTED principles.

8.5 International Standards Informing CPTED Principles and Applications

There are no (crime) risk and mitigation absolutes or guarantees when applying CPTED principles across Australian jurisdictions. However, there are two International Standards relevant to the application of CPTED: ISO 31000:2018, *Risk Management Guidelines*, provides a helpful framework to identify and manage any organisational risks, include crime risks.

A more recently, and relevant, gazetted Standard is ISO 22341:2021 *Security and Resilience – Protective Security – Guidelines for Crime Prevention Through Environmental Design*. It provides a theoretical and practical framework. ISO 31000 is incorporated into that framework. The following are extracted from the Standard.

“CPTED has an increasingly sound theoretical foundation based on firm evidence of significant crime and fear reduction gained from a series of formal and rigorous evaluations in the fields of environmental psychology, criminology and crime science. Well planned and wisely implemented, CPTED improves community safety, industrial security in a cost-effective manner.”

“CPTED is a process for analysing and assessing crime and security risks to guide development, urban design, site management and use of the built environment in order to prevent and reduce crime and the fear of crime, and to promote and improve public health, quality of life and sustainability.”

8.6 Instrument Compliance: Conclusions and/or Recommendations

Harris Crime Prevention Services consultants are of the view that reviewed drawings of the proposed build-to-rent redevelopment at 524 – 542 Pacific Highway St Leonards NSW are consistent, or will be consistent during design development, with CPTED principles and their application as required by:

- (i) legislation and/or regulations and crime prevention guidelines derived from Section 4.15 of the NSW Environmental Planning and Assessment Act, 1979, as amended,
- (ii) the NSW Department of Planning, Industry and Environment Secretary’s Requirements for SSD-35631707, in relation to CPTED considerations and associated public space design,
- (iii) Lane Cove Council’s Development Control Plan, 2010, as amended (2016),
- (iv) the NSW Police Crime Prevention (Safer-By-Design) Checklist – Revision 2020.

We conclude that, subject to intentional application of CPTED measures throughout design development-detail documentation, the reviewed drawings support consent by the above State and Council planning instruments, as that consent relates to fulfilling CPTED conditions.

9 Overall CPTED Consultancy Assessment Summary

In the professional opinion of Harris Crime Prevention Services, the Home build-to-rent redevelopment at 524 – 542 Pacific Highway St Leonards NSW, has considered, or will consider, CPTED Principles 1 to 5 and their application, as assessed by Harris Crime Prevention Services, from relevant referenced drawings and informing local and State planning instruments.

Incorporation of CPTED principles adheres to the State Government's 'social impact' and 'public interest' requirements, under Section 4.15 of the NSW Environmental Planning and Assessment Act, 1979, as amended, and with the Act's regulatory guidelines. Application meets the requirements of the Secretary, NSW Department of Planning, Industry and Environment.

The redevelopment also complies with requirements of Lane Cove Council's Development Control Plan, 2010 (amended 2016).

Our analysis and conclusions have been referenced against, relevant sections of the NSW Police Safer-By-Design (CPTED) Guidelines (2020).

The application of these principles, affirmed or recommended in this report, should be incorporated into design development and/or design detail, prior to 90+% sign-off.

Inter-disciplinary consolidation and incorporation of CPTED principles throughout the design process will achieve CPTED's inclusive objectives, to ensure the redevelopment's 'welcoming-and-safe-place' outcomes.

Harris Crime Prevention Services is also of the view that the proposed redevelopment should make a positive crime prevention contribution to Lane Cove Council's broader 'community safety' (crime prevention) objectives. The development's CPTED-applied architecture could 'showcase' future 'welcoming-and-safe-place' developments promoted and/or approved by the Council.

10 Crime Prevention Through Environmental Management (CPTEM)

Although not part of the consultancy brief, Harris Crime Prevention Services strongly encourages ongoing management oversight of 'welcoming-and-safe-place' security. For client consideration, Harris has developed CPTEM as a framework to complement and support CPTED initiatives.

The framework may be applied to most large mixed-use, single purpose and public realm sites and precincts. It would be implemented by facilities managers, building/site managers and/or security contractors in cooperation with stakeholder owners, operators, residents, tenants, contractors, councils and local police.

Over time, the purposes of developed built form, including public realm, may change. This in turn may lead to design and physical modifications. CPTED and CPTEM would therefore require review to ensure original crime prevention objectives are not compromised.

Harris believes that ad hoc and/or intermittent attention to CPTEM can negate CPTED's effectiveness and can leave stakeholders exposed to harm or litigation in the event of threats or incidents occurring within premises or precincts.

Harris also believes that CPTED and CPTEM are interdependently linked. CPTED is intentionally integrated with concept, master planning and design development briefs. CPTEM is focused on post-construction operational 'safe-place' objectives and outcomes.

Harris has identified five CPTEM principles.

Principle 1	Design Maintenance
Principle 2	Systems Management
Principle 3	Crime Risk Mitigation
Principle 4	Incident Responses
Principle 5	Monitoring and Evaluating

Principle 1 Design Maintenance

Most physical and mechanical CPTED installations require regular maintenance. Lights, signs, landscaping, security doors, gates, fences and locks should receive scheduled maintenance and appraisal to affirm (design) purpose, capability and integrity. Repairs and/or replacements should be undertaken immediately when failures are identified.

Principle 2 Systems Management

This involves the testing and management of security technology systems to ensure site-wide security and safety operational readiness. This includes physical (electronic) access control, alarm and IP Network (CCTV) surveillance systems. Regular scheduled testing for reliability, obsolescence, redundancy, replacement and re-alignment is essential, in some cases even mandatory.

Maintaining the integrity of security systems is also critical, when they are integrated with fire and emergency systems.

Principle 3 Crime Risk Mitigation

Practical security awareness procedures should be developed to engage steward-stakeholders – owner-operators, security contractors, facilities and/or site managers of retail, residential, recreational, commercial, health, educational, industrial, transport and public realm premises and precincts.

Procedures could be similar to emergency, general office or body-corporate procedures. They should be understandable and practical.

Where warranted and practical, there should be scheduled 'desktop' crime risk assessments to build and manage 'risk-change' and risk mitigation options.

Principle 4 Incident Responses

There are occasions when a 'what-to-do-in-the event-of...' scenario occurs.

Knowing how to identify and respond to anti-social and criminal incidents is critical.

Security, facilities, site/building managers should develop and 'rehearse' responses covering the most common major or minor categories. Incident recording and reporting should be (i) factual, (ii) relevant, (iii) accurate, (iv) clear and (v) concise.

Principle 5 Monitoring and Evaluating

Implementation of CPTED and CPTM requires on-going regular monitoring and evaluation; to 'test' and share the relevance, cost-effectiveness and value (real and perceived) of both frameworks. This should lead to improving future security design (CPTED) and security management (CPTM) outcomes. It may also mean that successful CPTED and CPTM measures can be replicated and/or 'modelled' for future developments.

11 References

DKO Architecture (NSW) Pty Ltd, Work in Progress Drawings, Revision A-WIP 17th September 2022,

DKO Architecture (NSW) Pty Ltd, Drawings Issue for Coordination, Rev.01 – 10.8.23, 02 – 22.8.23, 03 – 4.9.23,

Lane Cove Council, Development Control Plan 2010, as amended 2016 , Part D,

NSW Bureau of Crime Statistics and Research, *Crime Statistics for the suburb of St Leonards NSW*, April 2017 – March 2022,

NSW Environmental Planning and Assessment Act, 1979 as amended, *Section 4.15, (b) and (e)*,

NSW Department of Planning, Industry and Environment, Planning Secretary's Environmental Assessment Requirements, SSD-35631707,

NSW Police, *Crime Prevention Through Environmental Design (Safer-By-Design) 'Check List'*, Revision 2020,

Standard ISO 31000:2018, *Risk Management Guidelines*,

Standard ISO 22341:2021 *Security and Resilience – Protective Security – Guidelines for Crime Prevention Through Environmental Design*.

Appendices 1 and 2

APPENDIX 1 CRIME STATISTICS FOR THE SUBURB OF ST LEONARDS NSW

The following crime statistics are supplied by the NSW Bureau of Crime Statistics and Research. They are indicative of reported crime only and can only be taken as a guide to actual crime occurring in St Leonards over the (reported) 5-year period, April 2018 – March 2023.

NSW Crime Statistics April 2018 to March 2023 St Leonards (Suburb)											
	5 Year Trend to March 2023	Year to March 2019 Count	Year to March 2019 Rate	Year to March 2020 Count	Year to March 2020 Rate	Year to March 2021 Count	Year to March 2021 Rate	Year to March 2022 Count	Year to March 2022 Rate	Year to March 2023 Count	Year to March 2023 Rate
Homicide	n.c.	0	0.0	1	14	0	0.0	0	0	0	0.0
Assault - domestic	n.c.	5	81.0	8	124.1	9	125.9	15	206.5	13	179.0
Assault - non Domestic	n.c.	22	356.0	34	530.5	29	405.8	21	289.1	18	247.8
Sexual assault	n.c.	3	48.8	2	32.0	3	42.0	1	13.8	4	55.1
Sexual touching, sexual act & other sexual offences	n.c.	7	113.0	2	32.0	10	139.6	2	27.5	8	110.1
Robbery without weapon	n.c.	1	16.3	0	0.0	0	0.0	0	0.0	2	27.5
Robbery with a firearm	n.c.	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Robbery with weapon not a firearm	n.c.	1	16.3	0	0.0	0	0.0	1	13.8	0	0.0
Intimidation , stalking & harassment	n.c.	16	258.7	19	292.5	22	307.1	22	302.9	21	289.1
Other offences against the person	n.c.	0	0.0	0	0.0	1	14.1	1	13.8	0	0.0
Break & enter dwelling	n.c.	8	129.8	8	126.0	4	55.4	11	151.5	8	110.1
Break & enter non dwelling	n.c.	9	146.0	15	234.2	4	55.4	3	41.3	8	110.1
Motor vehicle theft	n.c.	2	32.5	1	16.0	2	28.2	1	13.8	2	27.5
Steal from motor vehicle	n.c.	17	275.0	19	300.1	6	83.6	15	206.5	5	68.8
Steal from retail store	n.c.	23	371.7	14	222.0	12	167.5	6	82.6	7	96.4
Steal from dwelling	n.c.	6	97.0	16	248.3	28	390.1	31	426.8	25	344.2
Steal from person	n.c.	5	80.7	3	48.0	5	70.5	1	13.8	3	41.3
Liquor offences	n.c.	3	48.5	1	16.0	1	13.8	4	55.1	6	82.6
Disorderly conduct	n.c.	8	129.5	9	142.0	2	27.9	9	123.9	8	110.1
Disorderly Conduct (criminal intent)	n.c.	2	32.5	3	46.1	0	0.0	0	0.0	2	27.5
Disorderly conduct (trespass)	n.c.	3	48.5	3	48.0	2	27.9	3	41.3	5	68.8
Disorderly conduct (offensive conduct)	n.c.	1	16.0	2	32.0	0	0.0	5	68.8	1	13.8
Drug offences	Stable	25	404.2	36	564.3	24	337.3	28	385.5	32	440.6
Malicious damage to property	n.c.	30	486.3	27	422.3	30	421.5	25	344.2	17	234.1
Prohibited and regulated weapons offences	n.c.	7	113.2	2	30.1	9	126.8	5	68.8	12	165.2
Arson	n.c.	1	16.3	0	0.0	0	0.0	1	13.8	1	13.8

APPENDIX 2 THE RISK MANAGEMENT STANDARD

While there are absolutes or guarantees around risk and risk mitigation, the International Standard - ISO 31000:2018 provides a helpful framework to identify and manage *any* organisational risks, including crime risks.

Identifying and mitigating crime risks is a legitimate application of the Standard. The Standard provides a theoretical and practical framework whereby contexts, risks, levels and consequences can be identified and managed.

The Standard defines generic risk as... “*the effect (impact) of uncertainty on objectives*” (ISO 31000 Clause 2.1). The Standard’s objective is to identify and remove or manage the uncertainty so as not to negatively impact on organisational objectives.

Harris has adapted and applied the Standard by defining (crime) risks within the **context**, assessing **risk levels** and affirming and/or recommending appropriate CPTED treatment.

The collective term ‘**risk**’ has been more widely defined as: *...‘the likelihood of something untoward happening and the consequence(s) if one or more risks become threats or incidents.’*

Threats and incidents are progressive in their definitions. If risks remain unidentified and untreated (unmanaged), they can rapidly and easily become threats or incidents.

A ‘**threat**’ may be defined as *‘unacceptable and escalating behaviour stemming from one or more ‘uncontrolled’ risks, which if not urgently managed, is likely to lead to harm or damage with negative consequences or outcomes.’*

An ‘**incident**’ may be defined as *‘an uncontained threat with likely negative harm or damage consequences.’*

2.1 An Adapted (Crime Incident) Identification and Behaviour Matrix

CPTED solutions should ‘match’ the (Harris adapted) assessed risk-to-incident behaviours. Recommendations and/or affirmation of architectural solutions should be considered (proposed) against this backdrop. The table identifies typical incident behaviours and potential consequences which may apply to this development.

<i>Low Crime Incidents and Potential Consequences</i>	disturbances, intimidation, and aggressive behaviour towards individuals or groups; graffiti and other minor property damage to the façades or street fixtures, fittings, paving, luminaires, plantings and signage
<i>Moderate Crime Incidents and Potential Consequences</i>	escalating intimidating or threatening behaviour leading to assault, and/or damage to personal property; unauthorised access, damage to and/or theft of property from the building, vehicles and/or vehicle theft
<i>High Crime Incidents and Potential Consequences</i>	‘moderate level’ crime risks escalated to intentional (planned) personal harm and /or damage to building facades and structures and/or property including plant and associated utilities infrastructure
<i>Extreme Crime Incidents and Potential Consequences</i>	immediate and dangerous threats to people and/or property, including the building and contents, vehicles, and/or nearby structures and/or utilities infrastructure, including bomb threats and hostile vehicle penetration

It is important to note that ‘consequences’ cannot be readily determined. Even low (level) crimes can have serious or catastrophic consequences.