

241-245 Pennant Hills Road Carlingford, NSW

Crime Prevention Through Environmental Design Report | September 2025
Proposed mixed-use shop top housing development

REF: 250104

Prepared by: New Leaf Planning

For: Triple Eight Corporation

ABN: 98 256 211 608

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Declaration

Name Jack Storch

Qualifications BDes Arch (Hons), MUrb Des

The undersigned declares that this Crime Prevention Through Environmental Design Assessment (CPTED Assessment) has been prepared in response to the following SEARs requirements issued for the Project on 23 May 2025 for SSD-84699461:

SEARs item no.	SEARs Requirement	Relevant Section of this Report
6	Built Form and Urban Design If relevant, provide an assessment of the development against: the design principles for residential apartment development set out in Schedule 9 of the Housing SEPP and the Apartment Design Guide (ADG). This should include a table which demonstrates how each dwelling (including affordable dwellings) performs against the ADG design criteria.	Sections 4.0-6.0

Signed



Dated 16 September 2025

Rev	For	Date	By
A	Draft for TOA	09/08/25	JS
B	For Submission	16/09/25	JS

1.0 Introduction

This Crime Prevention Through Environmental Design Assessment (**CPTED Assessment**) has been prepared by New Leaf Planning on behalf of Triple Eight Corporation at the Carlingford Unit for the construction and operation of a mixed-use development including infill affordable housing (**the proposal**) on land at 241-245 Pennant Hills Road, Carlingford (**the site**).

This report has been prepared to assess the proposal in terms of the key principles of CPTED and to provide recommendations that can be considered as part of detailed design for the site. It assesses the potential opportunities for crime and the perceived fear of crime that may be associated with the proposed new mixed use development as envisaged in the EIS to which this report is appended.

This report accompanies a State Significant Development Application that seeks approval for the demolition and construction of a mixed-use residential and commercial development including infill affordable housing, which involves the following:

- Site preparation works, including demolition of existing structures, vegetation removal as necessary, and bulk excavation.
- Construction and operation of a mixed-use development comprising commercial premises, gymnasium, child care centre and shop top housing as follows:
 - One 18-storey building (Building A) in the Northeast corner of the site; and two 4-5 storey buildings (Building B & C) along the western edge of the site.
 - A publicly accessible through site link between Pennant Hills Road and Felton Road.
 - 6 commercial tenancies at ground floor
 - A three-storey gymnasium within the southern portion of Building C
 - A 98 place child care centre located on level 01 of Building A
 - 2356m² of communal open space in the following locations:
 - the roof of Building A, B and C,
 - the two-storey podium of Building A
 - the publicly accessible through site link
 - A total of 136 residential apartments across the three buildings, including 25 infill affordable apartments,
- Provision of three levels of basement parking with a total of 263 car parking spaces comprising:
 - 151 residential car parking spaces (including 24 accessible spaces);
 - 30 commercial car parking spaces (including 4 accessible spaces);
 - 25 child care parking spaces (including 4 accessible spaces);
 - 26 gymnasium parking spaces (including 2 accessible spaces);
 - 26 visitor car parking spaces (including 12 accessible spaces); and
 - 3 car share spaces.
 - Street tree planting and landscaping, extension and augmentation of services and infrastructure as required.

For a detailed project description, refer to the Environmental Impact Statement prepared by Planning Direction.

1.1 Report Purpose

The purpose of this report is to assess the proposal in terms of the key principles of CPTED and to provide recommendations that can be considered as part of detailed design for the site. It assesses the potential opportunities for crime and the perceived fear of crime that may be associated with the proposed new mixed use development as envisaged in the EIS to which this report is appended.

CPTED is a situational crime prevention strategy that focuses on the design, planning and structure of the environment. This assessment aims to identify the potential opportunities for crime created by the proposed development by assessing the development in accordance with the design and place management principles of CPTED.

The following tasks were undertaken in the preparation of this assessment:

- review of the Safer by Design Manual by the NSW Police Force;
- collection and analysis of local and NSW State crime statistics from the Bureau of Crime Statistics and Research (BOCSAR); and
- a crime risk assessment, in accordance with the current NSW policy and practice, and assessment of the proposed development against the following assessment principles:
 - Natural surveillance,
 - Access control,
 - Territorial reinforcement, and
 - Space management.

The assessment undertaken in this report is based on drawings prepared by Kennedy Associates Architects dated 28 July 2025.

1.2 Report Structure

The structure of this report is as follows:

- Chapter 1 introduces the report;
- Chapter 2 identifies the site and context;
- Chapter 3 provides an overview of the proposal;
- Chapter 4 provides an overview of crime in the area;
- Chapter 5 provides a discussion of the development in the context of CPTED principles;
- Chapter 6 discusses mitigation measures including recommendations for future implementation; and
- Chapter 7 concludes the report.

2.0 Site Analysis

2.1 Subject Site

The site is identified as 241-245 Pennant Hills Road, Carlingford within the City of Parramatta Local Government Area (LGA). It is situated in the western portion of the Carlingford Local Centre and is located approximately 18km northwest of the Sydney Central Business District (CBD).

The site is an irregular triangular shape and comprises approximate frontages of 140m to Pennant Hills Road to the southeast, 100m to Felton Road to the north and 135m to the adjoining properties to the west. The site comprises a total area of 6331m², with the entirety of the site under single ownership.

The subject site is currently occupied by a two-storey masonry commercial building comprising several tenancies, including several small businesses and a 24-hour gymnasium. The building is in deteriorating condition. The building was originally purposely built and used as an infrastructure and management hub for Transgrid. The building was adapted for commercial use by means of a site compatibility certificate approximately 15 years ago.

The site is described in Table 1 below and illustrated in the Site Aerial Map in Figure 2 following.

Reference	Street address	Legal description	Area
1	241-245 Pennant Hills Road	Lot 1 DP805059	-
2	241-245 Pennant Hills Road	Lot 2 DP805059	-
3	241-245 Pennant Hills Road	Lot 5 DP805059	-
4	241-245 Pennant Hills Road	Lot 6 DP805059	-
total			6331m²

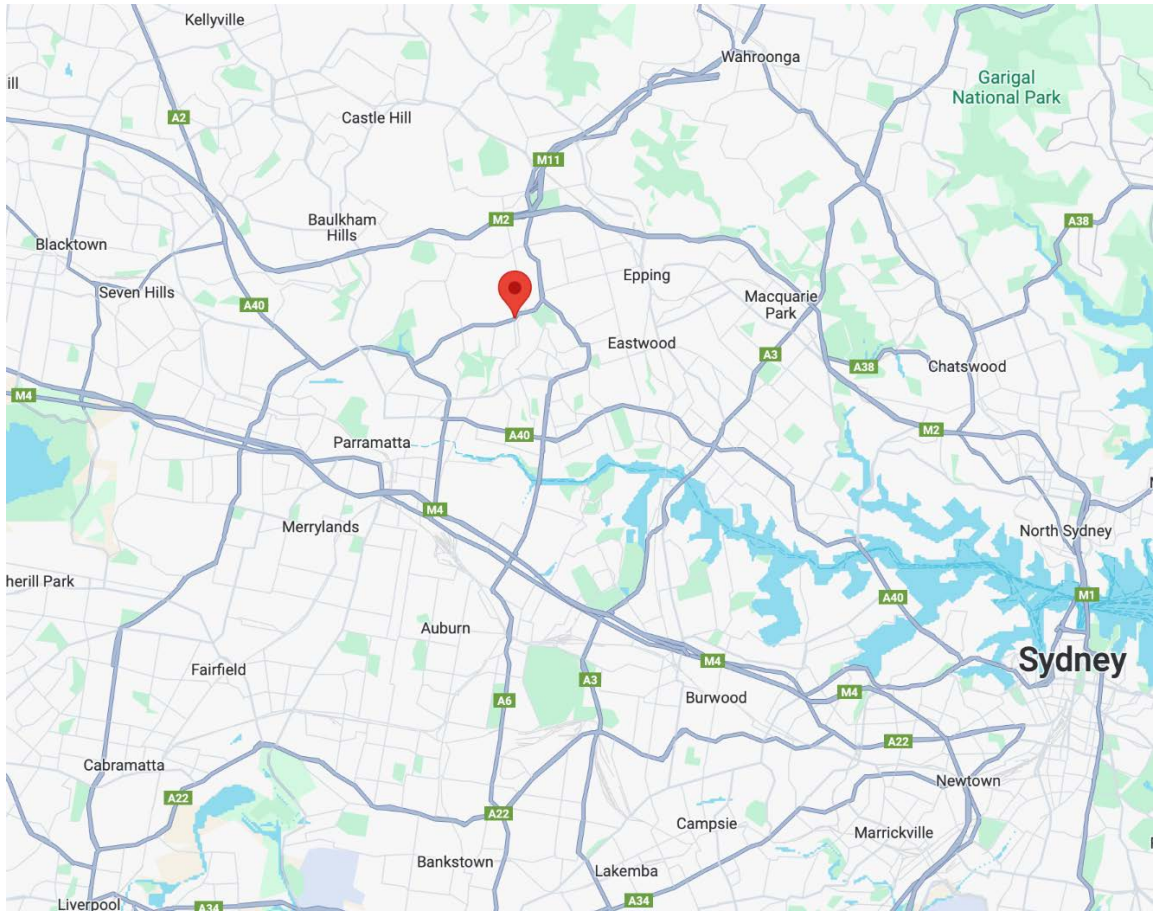


Figure 1: Context Plan (Source: Planning Direction Pty Ltd)



Figure 2: Site Aerial Map (Source: New Leaf Planning)

2.2 Surrounding Development

The site is located within the Carlingford Local Centre and is surrounded by a mix of uses, including residential dwellings with shop-top development, as well as low- and medium-density housing. The surrounding locality is characterised as follows:

- **North:** The Carlingford Transmission Substation fronts Felton Road which is directly north of the site, with a large fenced reserve containing multiple transmission towers located beyond. James Ruse Agricultural High School lies to the north-west, comprising several buildings and a large oval. Felton Road provides vehicle access to surrounding low-density residential areas.
- **South:** Medium-density residential buildings of varied size and height front Pennant Hills Road to the south of the site, with further low- to medium-rise dwellings located beyond.
- **East:** The site fronts Pennant Hills Road to the east and faces the heritage-listed K13 Submarine Memorial Park. The Carlingford Town Centre is situated further east.
- **West:** The site adjoins a mix of residential dwellings to the west, including two mid-rise residential developments immediately adjacent. The southern of these buildings has its primary private open space oriented towards the subject site.



Figure 3: Street View from Felton Road (Source: Google Maps)



Figure 4: Street View from Pennant Hills Road (Source: Google Maps)

2.3 Transport and Access

2.3.1 Vehicular access and parking

Vehicular access to the site is provided from both Pennant Hills Road and Felton Road. An at-grade car park is located on the eastern side of the site, slightly elevated above Pennant Hills Road, providing clear visibility to and from the street. This car park services customers and visitors, with passive surveillance opportunities from the existing commercial tenancies. Additional staff parking is situated at the rear of the site and accessed from Felton Road. This area is fenced and gated to restrict public entry.

A driveway connects Pennant Hills Road to Felton Road, allowing vehicles to circulate through the site. Access from Pennant Hills Road is restricted to left-in/left-out movements only. Visitor parking is located to the rear of the commercial tenancies, with signage provided. Signage is positioned along the internal driveway to deter unauthorised private vehicle access and support clear traffic movement.

2.3.2 Pedestrian and cyclist access

The site is well connected to the surrounding Carlingford area via established pedestrian footpaths. Continuous pathways along both sides of Pennant Hills Road and the side of Felton Road closest to the site provide direct access to nearby residential areas, the Carlingford Local Centre, and local services.

Pedestrian entry to the site occurs primarily via shared access points along Pennant Hills Road, which are co-located with the main vehicular driveway. Surrounding footpaths also connect directly to this entry, linking the site to the broader pedestrian network. Sightlines between the footpaths, entry points, and adjoining retail frontages allow for natural surveillance.

Due to the high traffic volumes and arterial function of Pennant Hills Road, there are limited opportunities for dedicated bicycle routes to connect directly to the site. However, the existing road network and nearby local streets offer potential for on-road cyclist access.

2.3.3 Public Transport Access

A bus stop is located within 100m of the subject site along Pennant Hills Road, which services Macquarie Park and Parramatta. Additional bus stops and the Carlingford Light Rail is located further east, which provides services to Parramatta, Macquarie Park and Epping.

2.4 Crime Risk Rating

Overall, the Crime Risk of the site is “moderate”, This review was based on the findings from a comprehensive desktop review of the site and its contextual surroundings.

The key positive elements of the site are:

- The site sits adjacent to a busy road of Pennant Hills Road which support a high level of pedestrian and vehicular traffic that provide a good opportunity for surveillance the existing site.
- The surrounding development consists of medium to high rise residential buildings. These developments overlook the site and provide a high degree of ‘natural’ community policing and effective guardianship.
- The site is supported by good pedestrian infrastructure which provides the opportunity for persons to pass the site and therefore provide passive surveillance opportunities.
- The site is located within a local centre which has a high level of activation at different times of the day and night.
- The site is located near James Ruse Agricultural High School which provides further activation at different times of the day.
- The surrounding locality is generally well maintained and includes signage, secure fencing, landscaping and paving that provides a clear delineation between public and private space.
- The landscaping surrounding the site is well maintained and provides limited opportunities for concealment.
- The site’s western boundary is bounded by residential properties whose rear yards have a direct interface to the site. These properties provide a good opportunity for surveillance the existing site.
- The site is opposite a fenced transmission substation that reduces opportunities for concealment.

The key negative elements of the site are:

- The site is opposite a transmission substation that will be less frequently used, consequently providing minimal opportunities for onlooking and passive surveillance.

- Felton Road to the north has the potential to function as an escape route.

It is noted that this risk assessment is based on the current physical environment of the site and its surrounds. This assessment does not speculate on the future condition of the surrounding urban environment.

Notwithstanding this, the formation of the newly developing urban environment and its surrounds are evident and inform the risk assessment for the site.

3.0 The Proposal

This State Significant Development Application seeks development consent for a new mixed-use shop top housing development, comprising retail premises, commercial premises and shop top housing including market and affordable dwellings.

Specifically, this SSDA seeks approval for:

- Site preparation works, including demolition of existing structures, vegetation removal as necessary, and bulk excavation.
- Construction and operation of a mixed-use development comprising commercial premises, gymnasium, child care centre and shop top housing as follows:
 - One 18-storey building (Building A) in the Northeast corner of the site; and two 4-5 storey buildings (Building B & C) along the western edge of the site.
 - A publicly accessible through site link between Pennant Hills Road and Felton Road.
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 - A total of 136 residential apartments across the three buildings, including 25 infill affordable apartments,
- Provision of three levels of basement parking with a total of 263 car parking spaces

Images of the proposed development are provided below.



Figure 5: Ground Floor Plan (Source: Kennedy Associates Architects)



Figure 6: South East Elevation (Source: Kennedy Associates Architects)



Figure 7: 3D View (Source: Kennedy Associates Architects)

4.0 Nature of Recorded Crime

Crime statistics obtained from the NSW Bureau of Crime Statistics and Research (BOCSAR) represent criminal incidents recorded by NSW Police. A review of the local statistics for 2024 found that the most commonly occurring crimes relevant to the Carlingford suburb were:

- Domestic assault
- Non-domestic assault
- Break and enter dwelling
- Steal from motor vehicle
- Steal from retail store
- Steal from dwelling
- Fraud
- Other theft
- Malicious damage to property
- Against justice procedures
- Drug offences
- Intimidation, stalking & harassment

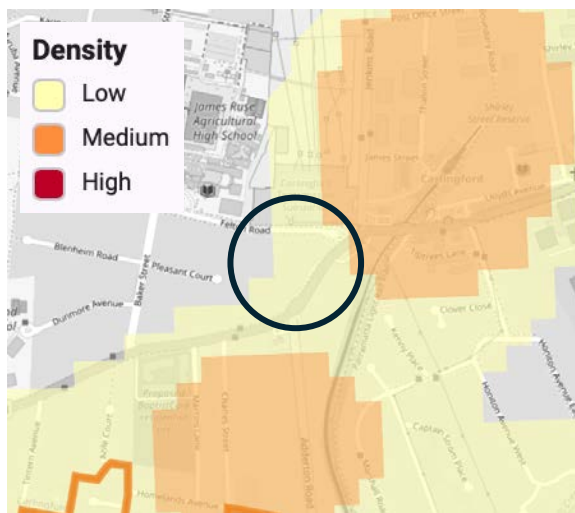
A summary of the key incidences per 100,000 people within the Carlingford suburb are detailed below:

Offence	2022-2023	2023-2024	2024-2025	Carlingford Rate 2024-2025	NSW Rate 2024-2025	Trend
Domestic Assault	51	63	55	189.5	456.8	Stable
Non-domestic assault	28	29	31	106.8	411	Stable
Assault Police	2	4	5	31.6	17.2	n.c.
Robbery without a Weapon	2	0	1	12.4	3.4	n.c.
Robbery with a firearm	0	0	1	3.4	1.1	n.c.
Robbery with a weapon not a firearm	2	2	0	0	9.3	n.c.
Sexual assault	7	16	11	37.9	136.9	n.c.
Sexual touching, sexual act & other sexual offences	12	20	10	34.5	103.4	n.c.
Break & enter dwelling	47	48	56	193	225.2	Stable
Break & enter non-dwelling	7	9	14	48.2	98	n.c.
Receiving/handling stolen goods	6	3	10	34.5	90.9	n.c.
Motor vehicle theft	22	17	24	82.7	179.8	n.c.
Steal from motor vehicle	53	70	66	227.4	312.7	Stable
Steal from retail store	51	58	60	206.7	345	Stable
Steal from dwelling	22	39	34	117.2	189	Stable
Steal from person	0	0	1	3.4	23.8	n.c.

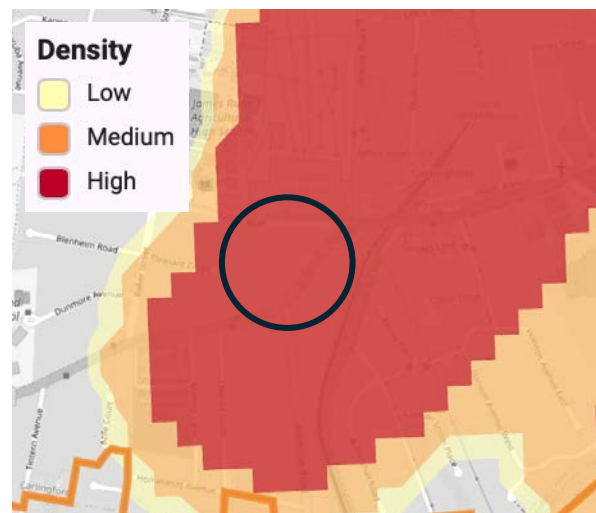
Fraud	129	116	104	358.3	502.1	Down 8.5% per year
Other theft	22	38	20	103.4	239.4	Stable
Malicious damage to property	77	51	59	203.3	576.7	Down 10.5% per year
Against justice procedures	51	44	33	113.7	1107.6	Stable
Disorderly conduct	23	19	16	55.1	234.8	n.c.
Drug offences	18	26	20	68.9	458	n.c.
Intimidation, stalking & harassment	49	70	46	158.5	586.3	Stable

As indicated in the table above, the suburb of Carlingford generally experiences low instances of crime. The above instances are generally lower than whole NSW population who reported higher or similar figures per 100,000 persons for most offences. The majority of crime categories were stable or trending downwards, with fraud and malicious damage to property significantly trending downwards at 8.5% and 10.5% per year respectively.

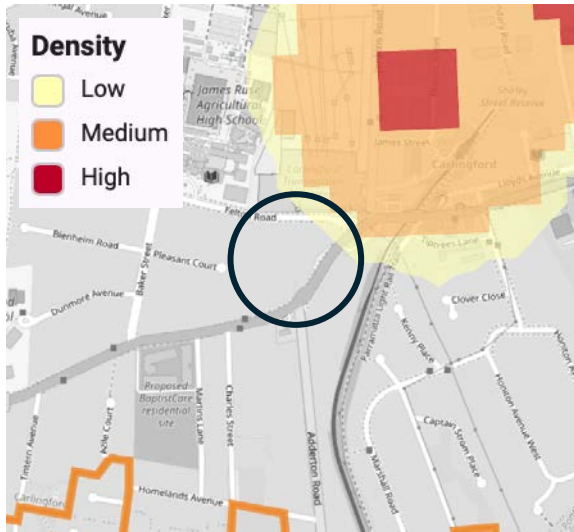
The BOCSAR database indicates that the site is located within or on the periphery of a crime hotspot as shown in the figures below.



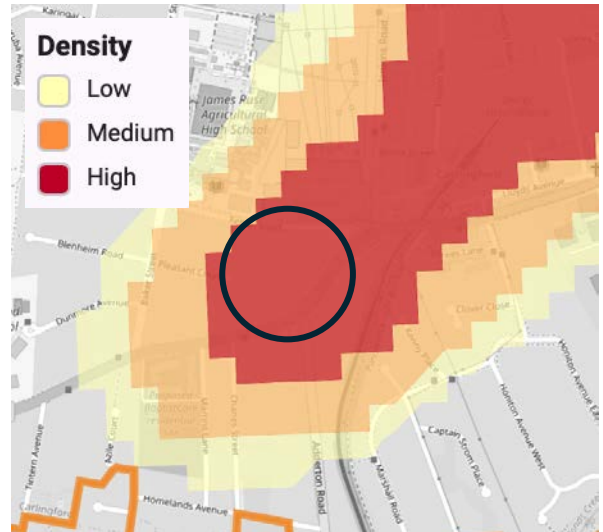
Hotspot Map – Domestic assault



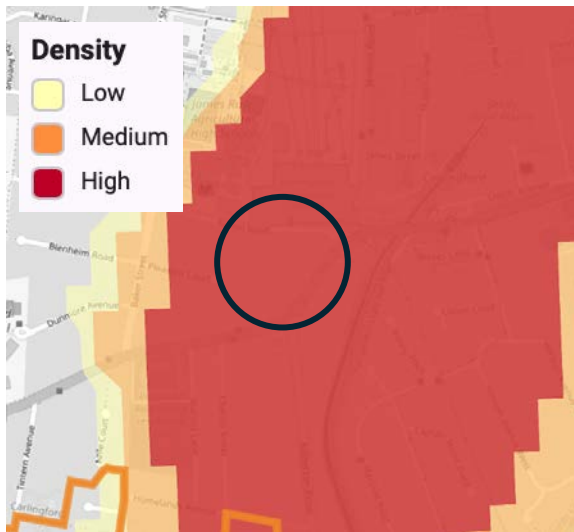
Hotspot Map – Break & enter dwelling



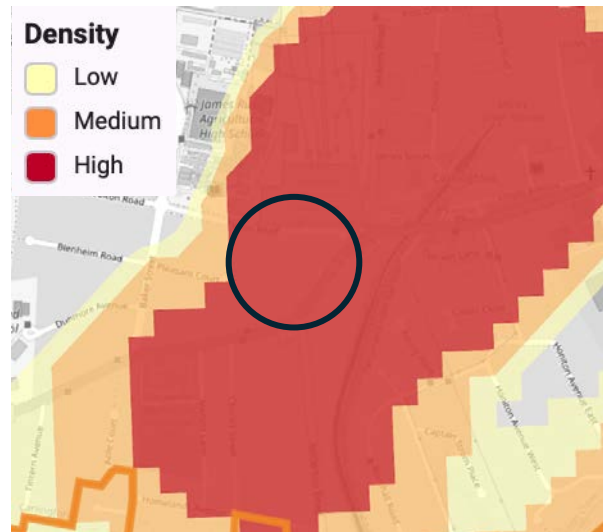
Hotspot Map – Break & enter non-dwelling



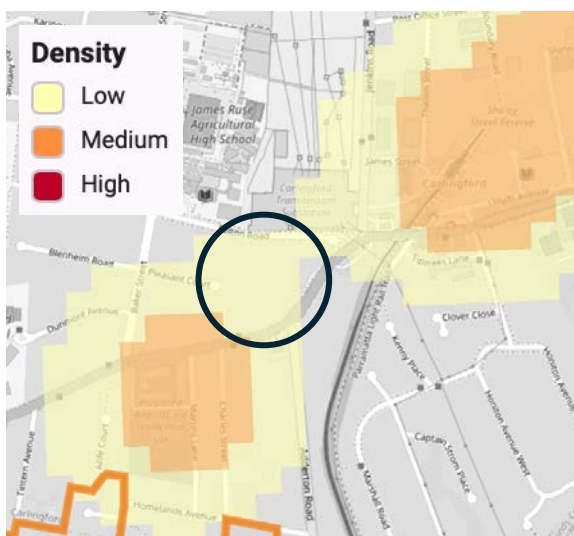
Hotspot Map – Motor vehicle theft



Hotspot Map – Steal from motor vehicle



Hotspot Map – Steal from dwelling



Hotspot Map – Malicious damage to property

As shown in the Crime Hotspot Maps, the site is located within the hotspots for break & enter dwelling, motor vehicle theft, steal from motor vehicle and steal from dwelling. In addition, the site is on the periphery of malicious damage to property, break & enter non-dwelling and domestic assault.

Hotspots indicate areas of high crime density (number of incidents per 50m x 50m) relative to crime concentrations across NSW. It should be noted that hotspots are common to medium to high density urban areas and do not necessarily indicate a need for extraordinary design responses.

Nonetheless, the site is located in an area identified as having a higher incidence of robbery, including within dwellings and motor vehicles. As such, consideration should be given to incorporating appropriate design principles for residential, retail, commercial, and car parking areas to enhance safety and reduce opportunities for crime.

5.0 CPTED Assessment

The following sections make a general assessment of the CPTED strategy against the concept design followed by the four CPTED principles: natural surveillance, access control, territorial reinforcement and space management. It also makes an assessment against key local planning controls including the Parramatta DCP.

5.1 Surveillance

Introduction to the Principle

The CPTED Principle of Surveillance is as follows:

The attractiveness of crime targets can be reduced by providing opportunities for effective surveillance, both natural and technical.

Good surveillance means that people can see what others are doing. People feel safe in public areas when they can easily see and interact with others. Would be offenders are often deterred from committing crime in areas with high levels of surveillance. From a design perspective, 'deterrence' can be achieved by:

- *clear sightlines between public and private places*
- *effective lighting of public places*
- *landscaping that makes places attractive, but does not provide offenders with a place to hide or entrap victims.*

Assessment of the Proposal

The proposed development will deliver a high level of natural surveillance, both within the site and to the surrounding public domain. Its long, unobstructed frontage to Pennant Hills Road benefits from high volumes of vehicular and pedestrian activity, maximising visibility and passive oversight.

Internally, surveillance is enhanced through active ground-floor uses, including commercial premises fronting Pennant Hills Road, a gym to the west, and childcare facilities overlooking the public domain. Smaller fine-grain commercial tenancies have been designed with extensive glazing to provide activation and passive surveillance throughout the day and into the evening.

A central through-site link will be highly utilised by workers and visitors accessing the commercial tenancies, channelling foot traffic in a way that activates key points within the site and the adjoining public domain. This link will be supported by adequate lighting and CCTV coverage. The anticipated steady flow of pedestrian activity, combined with the high degree of natural surveillance from both informal and formal guardians, will reduce opportunities for anti-social behaviour and limit the likelihood of it being perceived as a suitable location for loitering or homelessness.

The residential components of the development will further contribute to surveillance, with upper-level dwellings oriented to overlook the through-site link, Pennant Hills Road, and Felton Road. Building entries have been designed with short, direct sightlines to key vertical circulation points, such as staircases, ensuring ease of wayfinding while activating different parts of the building and improving visual surveillance of these areas.

Located on the edge of the Carlingford Local Centre, the site will benefit from regular patronage by both residents and visitors. The proposal will introduce new users to the site, contributing to activity levels and enhancing perceived and actual safety.

Landscaping is deliberately low-scale, with minimal hedging or dense vegetation, eliminating potential concealment opportunities along the through site link. Planting has been arranged to maintain clear sightlines along the through-site link and adjoining public spaces, supporting connectivity, visibility, and a strong sense of openness.

Adequate lighting opportunities are proposed along the through site link and adjoining the commercial tenancies, which reduces opportunities for shadowing along pedestrian access points.

5.2 Access Control

Introduction to the Principle

The CPTED Principal of Access Control is as follows:

Physical and symbolic barriers can be used to attract, channel or restrict the movement of people. They minimise opportunities for crime and increase the effort required to commit crime.

By making it clear where people are permitted to go or not go, it becomes difficult for potential offenders to reach and victimise people and their property. Illegible boundary markers and confusing spatial definition make it easy for criminals to make excuses for being in restricted areas. However, care needs to be taken to ensure that the barriers are not tall or hostile, creating the effect of a compound.

Effective access control can be achieved by creating:

- *landscapes and physical locations that channel and group pedestrians into target areas*
- *public spaces which attract, rather than discourage people from gathering*
- *restricted access to internal areas or high-risk areas (like carparks or other rarely visited areas). This is often achieved through the use of physical barriers.*

Assessment of the Proposal

The proposed development incorporates a clear and legible access hierarchy, comprising:

- **Primary access** - Fully public areas such as outdoor circulation spaces, the public domain, and adjoining streetscape.
- **Secondary access** - Semi-public spaces including building lobbies, the gym, commercial tenancies, and visitor parking areas.
- **Tertiary access** - Private spaces including residential car parking areas and apartment levels.

The design integrates these access levels into a cohesive layout, avoiding undefined or under-utilised spaces where anti-social behaviour could occur. All areas of the site are either activated built form or landscaped to a high standard, reinforcing a clear separation between public and private domains. There are clearly defined areas between public, private and semi-public areas undertaken through the below design measures.

The regular, linear arrangement of buildings and internal circulation routes supports wayfinding, ensuring users can easily navigate the site. Pedestrian movement is channeled through the central through-site link, which connects key destinations including the commercial tenancies and public spaces. This link is activated by surrounding uses, discouraging loitering in isolated areas.

Access to secondary and tertiary spaces is controlled through a combination of physical and electronic security measures. Basement parking areas are secured by a roller door separating public visitor parking from private residential parking. Residential building entries and lift lobbies are access-controlled via pass cards or similar systems, limiting entry to residents and authorised persons only. Separate entry points for residential and commercial uses further reduce the risk of unauthorised access, while maintaining a clear functional distinction between public and private uses.

Landscaping and boundary treatments have been designed to subtly reinforce access control without creating visual barriers. Low walls, planting, and surface treatments are used as symbolic markers to signal transitions between public, semi-public, and private spaces. In combination with clear sightlines and active frontages, these measures ensure movement through the site is predictable, well-defined, and easily monitored.

5.3 Territorial Reinforcement

Introduction to the Principle

The CPTED Principal of Territorial Reinforcement is as follows:

Community ownership of public space sends positive signals. People often feel comfortable in, and are more likely to visit, places which feel owned and cared for. Well used places also reduce opportunities for crime and increase risk to criminals.

If people feel that they have some ownership of public space, they are more likely to gather and to enjoy that space. Community ownership also increases the likelihood that people who witness crime will respond by quickly reporting it or by attempting to prevent it. Territorial reinforcement can be achieved through:

- *design that encourages people to gather in public space and to feel some responsibility for its use and condition*
- *design with clear transitions and boundaries between public and private space*
- *clear design cues on who is to use space and what it is to be used for. Care is needed to ensure that territorial reinforcement is not achieved by making public spaces private spaces, through gates and enclosures.*

Assessment of the Proposal

The Safer by Design guidelines note that well-cared-for areas with strong ownership cues are less likely to be misused. Given that several areas of the development are intended to be publicly accessible, the proposal incorporates a balanced approach to territorial reinforcement, including:

- **Defined boundaries:** The design provides clear transitions between public, semi-public, and private areas. The inclusion of residential entrance lobbies clearly signals private space, while also providing security for residents and visitors.
- **Functional separation:** The internal layout separates residential and commercial entrances, reinforcing distinct ownership and use of different parts of the development.
- **Activation of public spaces:** Public areas are concentrated at ground level, and are supported by semi-public commercial tenancies that feature extensive glazing to surrounding streets. This creates a welcoming environment for visitors, while enabling passive surveillance in and around the building.

The location of commercial tenancies and staff amenities throughout the site increases the presence of both formal and informal ownership over the space. Staffed areas in particular provide a continuous supervisory presence, which is often a stronger deterrent to crime than casual surveillance by pedestrian and vehicles that are passing by.

Although the through-site link is privately owned, it has been designed as a public, traversable space. Its high-quality design, active edges, and planned maintenance will reinforce perceptions of care and ownership, encouraging regular legitimate use.

5.4 Space/Activity Management

Introduction to the Principle

The CPTED Principal of Space Management is as follows:

Popular public space is often attractive, well maintained and well used space. Linked to the principle of territorial reinforcement, space management ensures that space is appropriately utilised and well cared for.

Space management strategies include activity coordination, site cleanliness, rapid repair of vandalism and graffiti, the replacement of burned out pedestrian and car park lighting and the removal or refurbishment of decayed physical elements.

Assessment of the Proposal

The proposed development incorporates strong space and activity management measures through the careful design and programming of its various uses. The commercial premises, the gymnasium, residential areas, the through-site link, and the rooftop terrace are each clearly defined through architectural form, layout, and materiality. These spaces convey a clear purpose, signaling how they are intended to be used, navigated, and managed.

The lower and upper ground floor circulation areas have been configured to provide well-defined and carefully controlled pedestrian movement patterns. The design clearly distinguishes between public, semi-public, and private areas, reinforcing how each space should be accessed and used.

The through-site link and associated public domain areas are designed for high levels of activation, supported by adjacent uses and clear sightlines. These spaces will be subject to ongoing management, including regular cleaning, landscaping maintenance, and lighting inspections, to ensure a consistently high standard of presentation. This approach will sustain positive perceptions of safety, deter anti-social behaviour, and encourage repeat visitation.

5.5 Parramatta DCP 2023

While the Parramatta Development Control Plan 2023 does not apply to this State Significant Development under the Planning Systems SEPP, the relevant provisions of Section 2.14 (Safety and Security) have been considered. An assessment of the proposal against these crime prevention provisions is provided below.

Control	Response
C.01 Casual surveillance is to be provided by designing buildings with a clear sense of address and orientating active uses or habitable rooms towards the street, as per Figure 2.14.1.	The development incorporates a clear sense of address to Pennant Hills Road and Felton Road, with active commercial frontages, a gym, and childcare uses at ground level directly addressing the street. Upper-level residential apartments are oriented to overlook both street frontages, maximising casual surveillance
C.02 Buildings adjoining laneways and through block connections should be designed to activate these spaces at ground level and provide casual surveillance from ground and upper levels.	The through-site link is activated by active ground-floor uses, commercial tenancies, and direct pedestrian entries. Residential apartments on upper levels overlook the link, ensuring continual passive surveillance.
C.03 Clear sight lines must be provided between public and private places.	The design ensures clear, unobstructed sightlines between public and private spaces through open frontage treatments and public domain outcomes. Entrances, circulation areas, and vertical movement points are positioned for maximum visibility.
C.04 Development should provide a clear definition and transition of boundaries between public and private spaces. Methods other than gates, fences, and enclosures are encouraged.	Clear spatial transitions are achieved through changes in materiality and architectural detailing.
C.05 Physical or symbolic barriers should be used to attract, channel and/or restrict the movement of people. Landscaping and/or physical elements may be used to direct people to destinations, identify where people can and cannot go, and restrict access to high crime risk areas such as carparks.	Pedestrian movement is channeled via the through-site link and main entrances using pathways, materiality and landscaping. Access to private areas, including residential car parking and lift lobbies, is restricted through access control measures such as roller doors and pass card systems.
C.06 Crime prevention measures in new buildings and spaces must not detract from the quality of the streetscape. Subtle design techniques should be applied to blend into façades and places. The	All security measures are integrated into the building's design, with glazing, lighting, and passive surveillance acting as the primary deterrents.

<p>installation of solid security shutters will not be supported.</p>	
<p>C.07 Design elements should contribute to community ownership of public and communal spaces, steering a shared sense of responsibility for a place's use and condition.</p>	<p>Active frontages, a well-landscaped public domain, and the integration of staff areas foster a sense of care and ownership.</p>
<p>C.08 Reduce the attractiveness of crime by minimising, removing or concealing crime opportunities. The design of development should increase the possibility of detection, challenge and apprehension of persons engaged in crime.</p>	<p>The development minimises concealment opportunities through open sightlines, low planting, and transparent frontages. Active uses, upper-level overlooking, lighting, and CCTV increase detection opportunities, reducing the likelihood of anti-social behaviour.</p>
<p>C.09 Public pedestrian areas within developments as well as communal access ways within multi-dwelling developments are to provide non-slip pavement surfaces.</p>	<p>All pedestrian areas and communal access ways will be finished with non-slip pavement materials, ensuring safe movement in all weather conditions.</p>
<p>C.10 A site management plan and formal crime risk assessment (Safer by Design Evaluation) involving the NSW Police Service may be required for large developments which, in Council's opinion, would create a crime risk.</p>	<p>This CPTED assessment has been prepared in accordance with Safer by Design principles.</p>
<p>C.11 The principal entry to dwellings should not be provided off rear lanes except where:</p> <ul style="list-style-type: none"> a) the lane is well lit, b) there is some natural surveillance of the lane from adjoining dwellings, c) the lane provides access to other dwellings, and d) the land is not regularly used by service vehicles. 	<p>No principal residential entries are proposed off rear lanes. All residential access points are from clearly visible, well-lit, and active frontages, ensuring natural surveillance and legibility.</p>
<p>C.12 Mailboxes are to be:</p> <ul style="list-style-type: none"> a) visually integrated with the development and have regard to the amenity of the streetscape. Design and location details are to be provided with the development application. b) located for convenient access by residents and deliverers on main pathways, and c) in compliance with Australia Post requirements for positioning and dimensions. 	<p>Mailboxes will be integrated into the design of residential lobbies, located along main circulation paths for ease of access.</p>

6.0 Mitigation Measures

An assessment of the proposal against the CPTED principles has determined that, with the implementation of the mitigation measures outlined below, the site would remain within the moderate risk category. It is noted that this rating is primarily a reflection of the site's location within a dense urban environment, rather than any deficiency in the proposed design, which is considered to be consistent with CPTED best practice.

The development will increase on-site population, generate high levels of activity, and attract both local residents and visitors. While crime will remain a factor in the surrounding public domain, as is typical within a busy local centre, the proposed design offers significant opportunities to enhance safety and security through the mitigation measures detailed below.

Surveillance

- Maintain clear sightlines between public, semi-public, and private spaces by avoiding large visual obstructions such as oversized signage, clutter, or unnecessary equipment during construction.
- Manage vegetation to ensure it remains low-scale and does not create concealment opportunities.
- Ensure internal and external circulation spaces (through-site link, lobbies, entrances, and basement ingress/egress) remain open and unobstructed.
- Provide clear signage to direct visitors to the different uses on the site improving legibility and minimising loitering.
- Maintain a consistent level of lighting throughout the exterior of the proposed development. Lighting should be adequate to permit facial recognition and provide visibility into a vehicle.
- Adequate lighting should be provided over the main residential entrance to ensure that the coming and going of residents and the surrounding public domain areas, especially at night are clearly visible from the street, from other buildings and from a distance.
- Install surveillance systems (e.g. CCTV) in areas of restricted natural and organised surveillance, most notably in the back-of-house areas, loading dock, the front entrances and the retail spaces.

Access Control

- Provide secure access systems (e.g. pass card or key control) to restrict entry to private areas, including residential lobbies, lift cores, and basement parking.
- Install secure roller doors to separate public visitor parking from private residential parking.
- Use landscaping, paving, and low barriers to channel pedestrian movement to intended routes and discourage access to restricted areas.
- Maintain all access points, including fire exits and stairs, to ensure they remain in good working order and accessible.
- Ensure emergency egress doors are alarmed and environmental conditions do not create unauthorised access points (e.g. climbable structures).
- The waste areas are located at grade and should be lockable and only accessed by authorised persons.

Territorial Reinforcement

- Maintain a clear distinction between public, semi-public, and private areas through changes in surface treatment, landscaping, and architectural detailing.
- Integrate high-quality, durable street furniture and public realm features to encourage legitimate use and convey a sense of ownership.
- Locate staff areas strategically to act as formal guardians over key public spaces.
- Use signage to reinforce the perception of active management and surveillance.
- Repair any damage promptly and undertake regular maintenance of all internal and external fixtures and surfaces. Repairs and maintenance should be documented clearly to enforce accountability to relevant staff.

Space/Activity Management

- Implement a regular maintenance and cleaning program, including rapid removal of graffiti, litter, and vandalism repair.
- Ensure lighting is well maintained and achieves consistent illumination in all public and semi-public areas, particularly the through-site link, lobbies, and car parks.
- Activate key public and semi-public spaces through appropriate commercial and community uses to ensure regular legitimate activity.
- Ownership and management of the site should be clearly displayed at the building's entrances.
- Prepare a Plan of Management prior to the occupation phase. This should include particulars on retail operating hours, maximum capacities, access and egress arrangements, maintenance and cleanliness to ensure all tenants are aware of their responsibilities.

7.0 Conclusion

The proposed development has been carefully designed to align with the four CPTED principles: Surveillance, Access Control, Territorial Reinforcement, and Space/Activity Management. Key features such as active street frontages, a highly visible through-site link, secure access to private areas, clear public-private transitions, and a well-managed public domain collectively enhance both perceived and actual safety.

While the site's location within a dense and active local centre results in an inherent moderate risk profile, this reflects the broader urban context rather than any shortcomings in the proposal. The integration of passive surveillance opportunities, secure access systems, legible pedestrian movement, high-quality landscaping and ongoing maintenance will reduce opportunities for crime and foster a strong sense of community ownership.

With the implementation of the recommended mitigation measures, the development will make a positive contribution to the safety, activation, and amenity of Carlingford over the long term.

