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REDFERN PAC - RMS

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NSW Police Force

Redfern Police Area Command
1 Lawson Square, 1 Lawson St,
Redfern NSW 2016
T 02 8303 5127
F 02 8303 5333
www.police.nsw.gov.au
ABN 43 408 613 180

6th November 2018

Director
Department of Planning and Environment
Key Sites Assessments
GPO Box 1591
Sydney, NSW 2000
Sydney, NSW 2000

Attention: Ms Ellen Mannix

RE: Police Submission for Development Application SSD 18 9275 – 80-88 Regent St Redfern

Dear Ms Mannix,

Thank you for the opportunity to comment on the Development Application for the above property/site for Demolition of existing structures and construction of an 18-storey mixed-use student accommodation building comprising 265 student accommodation beds within 185 units, ground level retail and business premises

DISCLAIMER

NSW Police Court and Legal Services have advised that police providing written crime prevention advice to the community (eg: Safer by Design Evaluations, SBD Executive Summaries, Security Audits etc) must include the following legal disclaimer:

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NSW Police has a vital interest in ensuring the safety of members of the community and their property. By using recommendations contained within this document, any person who does so acknowledges that:

- It is not possible to make areas evaluated by NSW Police absolutely safe for the community and their property.
- Recommendations are based upon information provided to, and observations made by NSW Police at the time the document was prepared.
- The evaluation/report is a confidential document and is for use by the person/organisation referred to on page one.
- The contents of this evaluation/report are not to be copied or circulated otherwise than for the purposes of the person/organisation referred to on page one.

NSW Police hopes that by using the recommendations contained within this document, criminal activity will be reduced and the safety of members of the community and their property will be increased. However, it does not guarantee that all risks have been identified, or that the area evaluated will be free from criminal activity if its recommendations are followed.

1. Introduction

In line with the New South Wales Environmental Planning & Assessment Act, 1979, Section 79C Crime Prevention Guidelines a Crime Risk Assessment (CRA) was conducted on behalf of City of Sydney Council, upon a development **80 to 88 Regent St, Redfern** by Redfern Police Area Command, 1 Lawson Square, 1 Lawson Street, Redfern.

Before a decision can be made on a development application, a consent authority (usually council) must consider the application under the NSW Environmental Planning and Assessment Act 1979, Section 79C. Included in this section are subsections requiring the consent authority to consider.

- the likely impacts of that development, including the environmental impacts on the natural and built environments and social and economic impacts on the locality,
- the public interest.

Crime prevention falls under these subsections of 79C. The relevant council have an obligation to ensure that a development provides safety and security to users and the community. If a development presents a crime risk, these guidelines can be used to justify;

- modification of the development to minimise the risk of crime, or

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- refusal of the development on the grounds that crime risk cannot be appropriately minimised.

This development has the potential to introduce new victims, crime opportunities and offenders to the development site and its surroundings. With this in mind Crime Prevention Through Environmental Design (CPTED) treatments need to be considered to reduce opportunities for anti-social and criminal behaviour.

2. Development and Surroundings

The site is located at 80 to 88 Regent Street, Redfern and is currently occupied by a row of five two-storey attached terraces with ground floor retail tenancies and upper level office and residential uses. The terraces are largely unoccupied.



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Existing buildings looking north west from Regent Street



Existing building and boundary fencing looking north west from Marian Street

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The adjoining site to the north identified as 68 to 70 Regent Street Redfern comprises an 18 storey building including Iglu student accommodation for 370 students with ground floor retail and commercial tenancies. Further north is the Regent Redfern Hotel.

The site is approximately 250 metres from Redfern train station. The surrounding area is characterised by a mix of uses including commercial, residential and retail developments, which range from 2-18 storeys. The site is adjacent to a landscaped open space, a bus shelter and a car repairs business.

Proposed Development

The proposal includes:

- Construction and use of an 18 storey building comprising: – 265 student accommodation beds within 185 units, arranged as follows:
 - 163 x studio units;
 - 6 x loft units; and
 - 16 x 6-bed cluster units
- Communal student facilities including study areas, rooftop terrace and laundry facilities;
- Three ground floor retail tenancies;
- A single commercial tenancy;

The proposal will operate as an integrated campus with the adjoining Iglu facility to the north which commenced operation in early 2018

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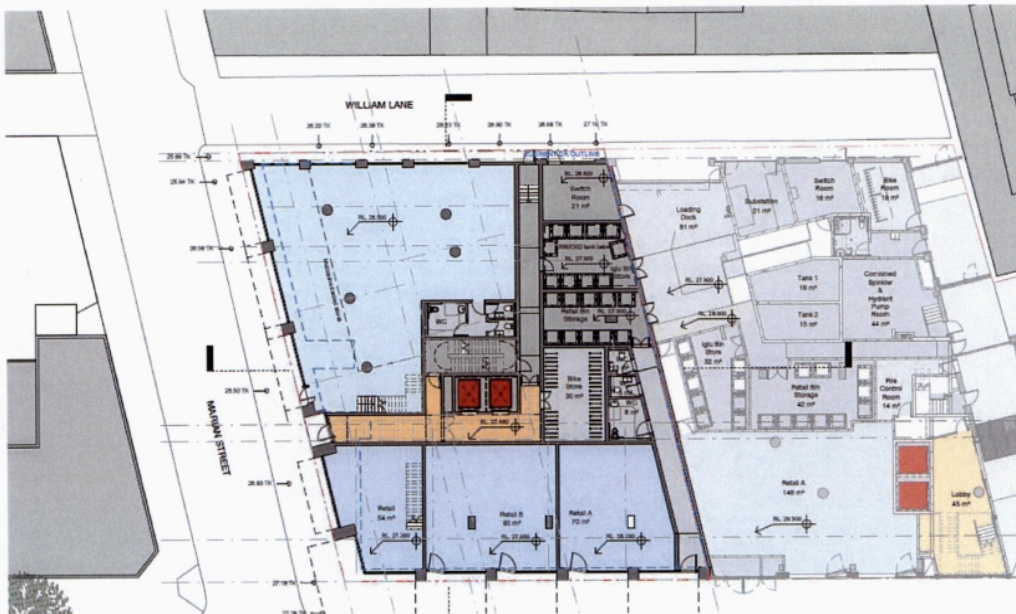
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Photomontage of proposed development looking north east as viewed from Regent Street



Proposed Ground Floor amalgamated with the existing adjacent Iglu

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- The General Manager will be contactable 24 hours per day, 7 days a week with Resident Leaders also being available
- Access to the property will be via the existing main entry foyer for the adjoining Iglu facility via Regent Street and will be restricted via an electronically coded swipe card provided only to current in-house residents and staff.
- Each student residing at Iglu will receive a swipe card programmed specifically for zoned access, namely the main foyer, lift access to their floor, access to their studio or share apartment (and access to their room).
- Students will not be able to access any other share apartment/bedroom that they do not occupy.
- The electronic system will allow Property Management to review and read every lock throughout the building and the cards that have accessed that point.
- CCTV will be installed to monitor all external access points, lifts and public areas within the property. In line with current operations at Iglu Redfern, all external access points will have reed switches and are alarmed and linked to a 24-hour monitoring company which will call the duty manager if left open for an extended time. A duress button is installed within reception/administration office that will be linked to a 24-hour monitoring company in case of emergency.
- Outside of office hours, there are Resident Leaders living onsite that are available to support students with administrative or student welfare issues. Resident Leaders are employed and trained by Iglu to act as duty managers outside of office hours.
- Security Guards patrol the building as dictated by site specific neighbouring establishments and events.

No vehicle access or parking is provided on site as part of the development, in light of the high accessibility via alternate transit modes including public transport, cycling and walking.

The proposed development includes pedestrian access from Marian Street to the central lift core as well as an emergency egress to William Lane and service egress to Regent Street. The existing Iglu Lobby fronting Regent Street will be the main pedestrian access point. Access to the Central Lobby can also be gained via the existing through site link entrance at Redfern Street.

Integrated Communal Hub

The proposed development seeks to integrate with the adjoining Iglu facility to the north to achieve spatial and operational efficiencies as well as create additional opportunities for student interaction..

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Outdoor Terrace and Courtyard

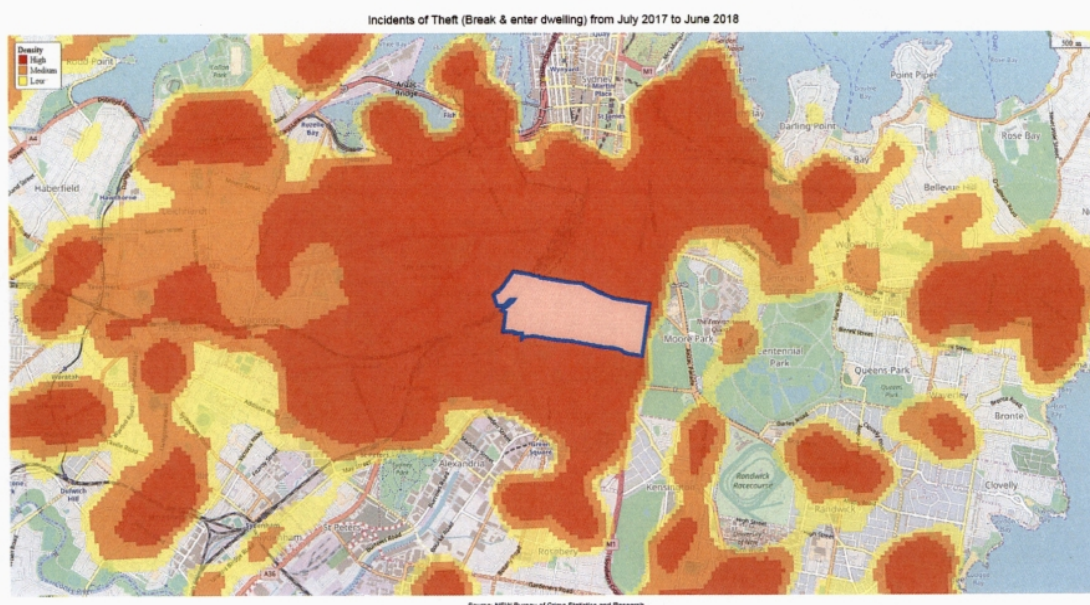
Except in the case of occasional Iglu hosted and managed events, (occurring less than a dozen times a year) the use of these spaces will be restricted to the hours of 9am to 10pm and will be enforced by on-site staff and door access control. The outdoor spaces will be used for general passive recreation and communal gatherings and relaxation.

Retail and Commercial Tenancies

The fit out and use of the retail and commercial tenancies, including operational management will be subject to future Development Consent.

Crime Data

Data from the New South Wales Bureau of Crime Statistics and Research (BOCSAR) indicates that the area in which this site is located is a high density Hotspot for robberies, break and enter and malicious damage to property.



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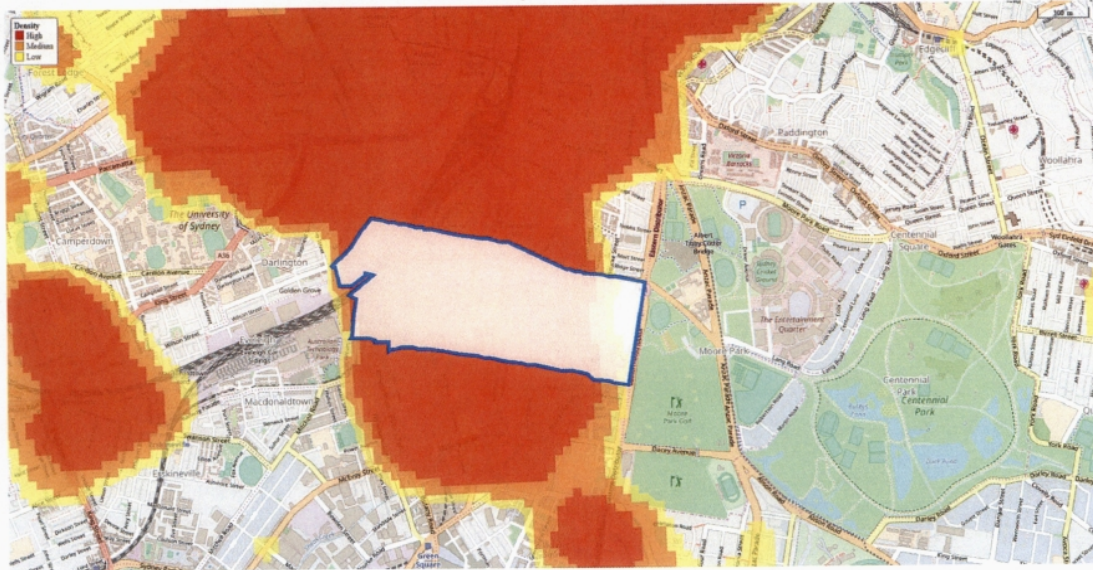
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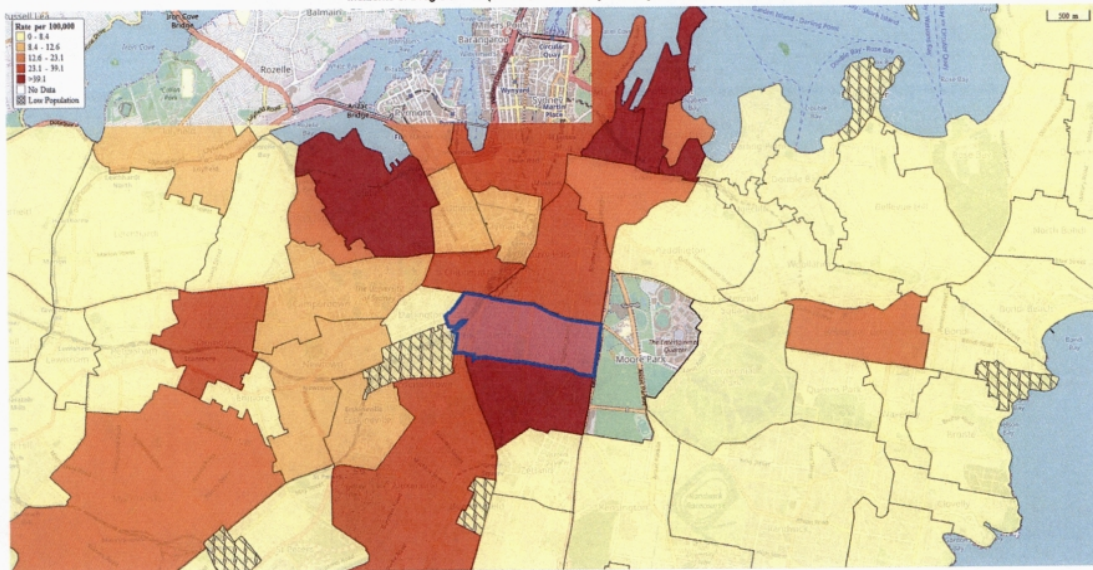
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Incidents of Robbery from July 2017 to June 2018



Incidents of Drug offences (Deal/traffic narcotics) from July 2017 to June 2018



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3. Site Risk Rating

This risk rating is based on Police Data, PAC Rankings including area hot spots, which include Robberies, Steal from Motor Vehicles and Break, Enter and Steal. The proposed development is bordered by mostly residential properties. The proposed development will increase the vehicular and pedestrian traffic to an already congested area.

The NSW Police Safer by Design Evaluation process is based upon the Australian and New Zealand Risk Management Standard ANZS4360:1999 (3). It is a contextually flexible process that identifies and quantifies crime hazards and location risk. The process includes measurement of crime likelihood (probability), consequence (outcome), distributions of reported crime (hotspots), socio-economic index for areas (SEIFA) (disadvantage), crime opportunities.

As a result of this process, a ***moderate*** crime risk rating has been identified for this development on a sliding scale of low, moderate, high and extreme crime risk. The Environmental Planning & Assessment Act 1979, Section 79C Crime Prevention Guidelines require City of Sydney Council (consent authority) ensure that this development provides safety and security to users and the community.

With this in mind, natural, low organised and high technical mechanical Crime Prevention Through Environmental Design (CPTED) treatments need to be considered for the proposed development in order to reduce opportunities for crime.

4. Crime Prevention Through Environmental Design (CPTED)

Crime Prevention through Environmental Design (CPTED) is a crime prevention strategy that focuses on the planning, design and structure of cities and neighbourhoods. It reduces opportunities for crime by using design and place management principles that reduce the likelihood of essential crime ingredients from intersecting in time and space.

Predatory offenders often make cost-benefit assessments of potential victims and locations before committing crime. CPTED aims to create the reality (or perception) that the costs of committing crime are greater than the likely benefits. This is achieved by creating social and environmental conditions that:

- Maximise risk to offenders (increasing the likelihood of detection, challenge and apprehension)

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- Maximise the effort required to commit crime (increasing the time, energy and resources required to commit crime)
- Minimise the actual and perceived benefits of crime (removing, minimising or concealing crime attractors and rewards), and
- Minimise excuse-making opportunities (removing conditions that encourage/facilitate rationalisation of inappropriate behaviour).

CPTED employs a number of principles, surveillance, access control, territorial re-enforcement, space & activity management to reduce opportunities for criminal and anti-social behaviour. Surveillance

Surveillance

Surveillance is achieved when users of the space can see or be seen. Generally, people involved in anti social or criminal behaviour do not like to have their activities monitored. With this in mind the layout of the space, orientation and location, and the strategic use of design can make it difficult for criminals to operate with ease. Surveillance should be a by product of a well planned, well designed and well used space can help to reduce opportunities for crime by increasing surveillance opportunities.

Objectives

- a) Ensure that there is good surveillance to and from the development to reduce opportunities for crime.
- b) Ensure that there is good surveillance throughout the development to reduce opportunities for crime.
- c) Ensure that lighting in and around the development complies with the Australian Standard – Lighting to increase surveillance opportunities during the hours of darkness
- d) Ensure that lighting in and around the development is commensurate with the closed-circuit television requirements.

General Comments in Design for Surveillance:

- Entry points should be designed to maximize surveillance opportunities to and from these areas.
- The placement and orientation of common entry areas should maximize opportunities for natural surveillance by residents.

Recommended Conditions of Consent:

- Consideration to be given to the installation of CCTV surveillance cameras for the development, paying particular attention to those areas susceptible to anti-

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social behavior and criminal activity. This includes the outside laneway areas (William Lane, common areas on the ground level near the retail stores, roof top area reception area, front entry, common areas on level one, bicycle storage area, rear loading area (access via William St) and any other area where people may congregate.

- Final inspection on the surveillance cameras should be carried out preferably by City of Sydney Council to confirm the following has been implemented. If this is not practical a private certifier must confirm the following:
 - A digital CCTV system must be installed and be in constant operation covering all entry/exit points and the cameras must be fitted so as to capture images of the face of potential offenders that may be wearing caps or hats. The CCTV system and installation must be in accordance with Australian Standards.
 - Suitable and clearly visible signage shall be displayed at the principal entrance(s) to the premise, in lettering not less than 50mm in height with the words "Closed Circuit Television in use on these premises". The same signage to be attached in a prominent position on the bulkhead on each respective level of the premises.
 - All CCTV recording equipment and cameras shall be of high grade digital quality capable of establishing the population and identification of patrons, offenders and incidents within the depth of field view of the cameras. In this respect each surveillance camera shall be capable of recording a minimum rate of 10 frames per second and at high resolution.
 - CCTV recording discs or hard drive recordings shall be retained for 30 days before being re-used, destroyed or deleted. Time and date shall be auto recorded on the disc or hard drive. The CCTV recording equipment shall be capable of reproducing a CD/DVD copy of recorded footage on demand of Council or Police Officers either immediately or within 12 hours of the request being made. Copy discs must be handed to Council, Police Officer or Special Inspectors as required.
 - All CCTV recording devices and cameras shall be operated 24 hours per day and 7 days per week.
 - The manager is responsible, to ensure the CCTV system is fully operational. All checks and faults are to be recorded and reported to those responsible.

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- All staff are trained to copy CCTV footage upon request by Police.
 - The CCTV is registered with the NSW Police Force CAMFIND program.
 - CCTV system set up in staff only areas where customers cannot easily access and minimise tampering.
 - CCTV to be installed to cover bicycles area. Police suggest that caged lock up areas be installed or tethering post to allow bicycles to be secured to.
- Will mailboxes be located within the complex and what security measures will be introduced to protect them? Mailbox theft and identity fraud is high within New South Wales. Mailboxes should be located within a locked foyer area, inside a gated or fenced compound of the building. Police suggest locks installed to be Non-master keyed locks – the tail cam of the cam lock is to be a minimum of 2.5mm thick for strength. Mailboxes to have flush fitting doors to minimise forcing open the mailbox
 - Push bikes are also viewed as a high commodity as they are easily disposed of therefore police suggest strong cage structures should be erected to house them incorporating strong quality locks (proposed U-Locks). Bicycle storage needs to be placed where there is good natural surveillance and enhanced with good quality CCTV. Also the material used for the storage cages need to be strong. Wire mesh can be easily cut and access gained by offenders. This is a major concern for our command.
 - Use of clear glazing around the courtyard on level one to provide unobstructed views from internal spaces into the courtyard.

Retail/Commercial spaces

- Retail tenancies to position counters where they are visible from the street or pedestrian walk ways and near the entrance. Signage for windows should be placed that they do not obscure the natural surveillance into or out of the business.
- Staff must be provided with a secure and safe place to leave their belongings (eg lockers).
- The cash register must be regularly cleared to keep the total cash held in the register under \$250 or as minimal as practicable and the cleared cash must be directly placed into a safe and secured.

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- The installation and specifications of the safe needs to be in accordance with the Australian Standards.
- Façade of commercial tenancies along Regent Street should largely consist of transparent glass to increase natural surveillance from passersby.

Lighting

There is a proven correlation between poor lighting, fear of crime, the avoidance of public places and crime opportunity (Painter, 1997). With this in mind the Australian Standards, Lighting AS: 1158 now requires lighting engineers and designers to factor in crime risk and fear when choosing the type of luminaries/lighting levels. Good lighting can assist in increasing the usage of an area.

Recommended Conditions of Consent:

- Emphasis should be on installing low glare/high uniformity lighting levels in line with Australian Standards AS:1158
- A lighting maintenance policy needs to be established for the development. The developer should pay attention to the installation of appropriate lighting in and around the common areas.
- Lighting should be vandal resistant and placed around the perimeter of the property, at all entry/exits points, on footpaths leading to the premises and also throughout the proposed common areas.
- High quality lighting along William Lane to ensure that the lane is a well-lit pedestrian connection to the secured laneway providing access to the ground floor retail and through site link from Redfern Street.
- Lighting sources should be compatible with the requirements of any surveillance system installed within the development. Poor positioning choices in relation to light can cause glare on the surveillance screens.
- Police suggest that automatic lighting be installed in the bicycle area. This will allow people entering the room to know if there is another person in the area.
- Lighting in William Lane to be installed at the rear of the premises. William Lane has poor night lighting with many areas of concealment, making it a vulnerable area for crimes.

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Space Activity Management

Space and activity management involves the control, supervision, and care of space. All space, even well planned and well-designed areas need to be effectively used and maintained to maximise community safety. Places that are infrequently used are commonly abused. Space and activity management strategies are an important means of developing and maintaining *natural* community control.

Objectives

- a) Ensure that management are aware of their obligations under the Work, Health & Safety Act & Regulations.
- b) Ensure that staff are aware of their obligations under the Work, Health & Safety Act & Regulations.
- c) Ensure that management are aware of their obligations in relation to fire safety.

Recommended Conditions of Consent:

- The manager be identified and be contactable to aid emergency services to gain entry if there are any related issues preventing them from getting immediate access.
- Noise/Disturbance – The communal areas, when utilized for recreation (the surrounding streets being isolated have the potential to be utilized for such), have the potential to cause an echo effect which can cause ongoing adverse impacts on surrounding residential properties. The use of the roof top communal area is to be restricted to daylight hours only and rules are to be enforced by management.
- Alcohol – Management to enforce rules regarding alcohol consumption on premises especially in communal areas and outside the property.
- The operational plan of management should detail procedures for the management of after-hours security and the use of the common areas within the student accommodation.

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Territorial Re-enforcement

Territorial re-enforcement is about ownership, who owns the space, who manages the space, and who cares for the space. Criminals are more likely to be deterred by the presence of people who are connected with and protective of a space that by people who are just passing through. It employs actual and symbolic boundary markers, spatial legibility and environmental cues to 'connect' people with space, to encourage community responsibility for the space and to communicate to people where they should and should not be and what activities are appropriate.

Objectives

- a) Ensure that the boundaries of the development are clearly defined to reduce excuse making and crime opportunities.
- b) Ensure that signage is displayed to provide guidance to users of the development and reduce excuse making opportunities.

Recommended Conditions of Consent:

- Communal spaces are to be managed appropriately to discourage anti social behavior. Signage to be placed in communal areas to display rules regarding alcohol and drug use, behaviour and restricted opening hours.
- Warning signs should be strategically posted around buildings to warn intruders or what security treatments have been implemented to reduce opportunities for crime
 - Warning, Trespassers will be prosecuted
 - Warning, these premises are under electronic surveillance
- A graffiti management plan needs to be incorporated into the maintenance plan for the development. Research has shown that the most effective strategy for reducing graffiti attacks is the quick removal of such material generally within 24 hours
- '000' Emergency number displayed
- Ensure wayfinding strategies are incorporated throughout the ground floor to demarcate the commercial retail, the through site link, lane way and the main lobby for the student housing, reducing the disorientation of users.

Access Control

Access control should restrict, channel and encourage people and vehicles into, out of and throughout areas. It can be used to increase the time and effort required to commit a

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crime and to increase the risk to people involve in anti social and criminal behaviour. With this in mind the tactical use of design features including building configuration, security hardware, pathways, landscaping, fencing, gardens and on site guardians can control access and help to reduce opportunities for anti-social or criminal behaviour.

Objectives

- a) Ensure that access to the property is controlled to reduce opportunities for crime.
- b) Ensure that access to restricted areas within the property is controlled to reduce opportunities for crime.

Recommended Conditions of Consent:

- The door and door frames to these premises should be of solid construction.
- High quality door and window locks must be fitted to all openings that are accessible by the public. The locks must comply with the building code of Australia.
- The windows and window frames to these premises should be of solid construction. These windows should be fitted which comply with the Australian Standard – mechanical locksets for windows in buildings, AS: 4145 to restrict unauthorized access.
- Access to the building to be controlled by electronic pass system to restrict entry to residents only.
- Police suggest that the main access doors to all personal bedrooms, office areas, common areas and bike lock up area be automatically closing. This will ensure that doors are locked upon the patrons exit. This will ensure that area areas are locked and secured at all times deterring theft.
- Poor supervision of communal facilities such as laundries and garbage disposal areas can increase the risk of crime including theft and vandalism and dumping. Areas that are unused or sporadically used after hours and unsupervised should not be accessible to the public.
- The Fire access doors on William Lane and Marian Streets to be self closing and alarmed

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General Comments

A number of recommendations were made to reduce opportunities for criminal and anti-social behaviour. Redfern police area command object to the roof level open space. This area has the potential to create excessive noise which will echo into the surrounding area. If the space is approved the restricted hours from 7am to 7pm should be strictly enforced by management.

Redfern Police Area Command also recommend:

- There is no parking provided for the development. There is heavily restricted street parking in the vicinity of this project, due to demand. Police strongly encourage projects such as these to include more vehicle parking.
- That the manager will accept and assess applications for residence and strictly enforce house rules especially the use of the roof level common area, group socialising, behaviour, alcohol and drug use
- All criminal incidents that occur on the premises to be reported to NSW Police. Information packages including Police/Emergency Contact numbers must be provided to all customers who reside on the premises
- Clear details and signs outlining Emergency Contact numbers for Police/Fire/Ambulance, must be provided in clear sight (eg in the main Foyer area)
- Residents should be encouraged to record serial numbers of push bikes and electrical goods. Serial numbers are a key component when reporting lost property or theft of such items. It also enables return to rightful owner if located
- There should be safe's located on the premises so residents can store personal items such as passports, currency, valuables etc.

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Conclusion

Please refer to all the concerns raised in the above report and in particular to the CPTED Principals where Redfern Police Area Command have highlighted concerns in relation to this design proposal.

We would like to thank you for the opportunity to comment on this proposed development and should you require further information on the subjects mentioned within this report, please feel free to contact Leading Senior Constable Morony, Crime Prevention Officer, Redfern Police Area Command, Phone (02) 83035127 or by email 45706@police.nsw.gov.au.

Yours sincerely



Alex Liouthakis
Acting Superintendant
Redfern Police Area Command

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