

27 May 2021

Ryan Peeters
90 - 102 Regent Street, Redfern Student Housing
Development
ALLEN JACK+COTTIER

Dear Ryan

**90 - 102 Regent Street, Redfern Student Housing Development - City of Sydney
Revised Reply to Submissions**

This letter has been prepared by Elton Consulting on behalf of The Trust Company (Australia) Limited ATF Wee Hur Regent Trust to respond to issues raised by City of Sydney Council *the City) in relation to the proposed redevelopment (SSD-10382) of the site at 90-102 Regent Street, Redfern (the site) as student accommodation.

In particular, the City has raised concerns in relation to door openings onto the proposed footpath on William Lane. In its submission Council requested that the development remain on private land and that the doors not open onto the William Lane public space.

Elton Consulting was commissioned to undertake a Crime Prevention Through Environmental Design (CPTED) assessment in support of the SSD-10382. This assessment was prepared by a certified NSW Police Risk Assessor using qualitative and quantitative measures of the physical and social environment to analyse and suggest treatment for crime mitigation measures in accordance with the Australian and New Zealand Risk Management Standard AS/NZS 31000:2009.

CPTED is based on four key principles including:

1. Natural surveillance
2. Access control
3. Territorial reinforcement
4. Space management

Principles 2 to 4 are relevant to this letter and include the following specifications:

Access control – control of who enters an area so that unauthorised people are excluded, for instance via physical barriers such as fences, grills etc. 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.

Territorial reinforcement (ownership and activity support) – people are more likely to protect territory they feel they own and have a certain respect for the territory of others. This can be expressed through installation of fences, paving, signs, good maintenance and landscaping. Territoriality relates to the way in which a community has ownership over a space. Territorial reinforcement can be achieved through design with clear transitions and boundaries between public and private space

Space management (activity support and maintenance) – ensures that space is appropriately utilised and cared for. Space management strategies include activity control, site cleanliness, rapid repair of vandalism and graffiti, the replacement of burned out lighting and the removal or refurbishment of decayed physical elements.

Relevant provisions of Sydney DCP 2012 in relation to CPTED are as follows:

- » Provide a safe environment and minimise opportunities for criminal and anti-social behaviour
- » Active spaces and windows of habitable rooms within buildings are to be located to maximise casual surveillance of streets, laneways, parking areas, public spaces and communal courtyard space.
- » Minimise blind-corners, recesses and other external areas that have the potential for concealment or entrapment.
- » Ground floors of non-residential buildings, the non-residential component of mixed use developments, and the foyers of residential buildings, are to be designed to enable surveillance from the public domain to the inside of the building at night.

Many of the crimes in the area are opportunistic and can be minimised through the adoption of appropriate CPTED principles. It is important that appropriate CPTED measures are put in place to minimise future opportunities for crime in the development.

The subject doors have been designed to be flush with the William Street façade. By minimising any recesses on the William Street façade of the building it is intended to minimize crime and deter antisocial behaviour, reducing the area for concealment or cover for anyone near the building.

The outward opening doors are also part of the safety measure associated with a fire escape stairwell that exits the building onto William Street. Normal entry (and exit) doors are not usually designed for a large amount of people to try and exit all at once, which could result in failure during an emergency. Outward opening doors improve the effectiveness of the fire escape area. Fire exit doors should open in the direction of escape. These same principles apply to the loading dock, substation and, bike store and Workshop. Any emergency exits in the facility must adhere to the WHS Act, the stipulations outlined in the Building Code of Australia (BCA), and the Managing the Work Environment and Facility Code of Practice.

Due to the above mentioned, reasons and recommendations, and especially the DCP provisions which require applicants to 'minimise blind-corners, recesses and other external areas that have the potential for concealment or entrapment', as well as the fire safety principles that support outward or escape direction facing doors, it is therefore Elton Consulting's view that setting the subject doors back in from the façade line will compromise the public safety.

Yours sincerely



A handwritten signature in black ink, appearing to read 'Lawrence Fowle'.

Lawrence Fowle
Urban and Regional Planning Graduate
lawrence.fowle@wsp.com