



NSW Police Force

NSW POLICE FORCE

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Safer By Design Security Assessment.

DISCLAIMER

NSW Police Force has a vested 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 Force 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.

Local Development Application referral
Two residential towers, commercial and retail space –
472 – 494 Pacific Highway, St Leonards – updated submission
MIRVAC application

Site Description:

The property subject to the development application is located within a Commercial/ Business district on the Pacific Highway St Leonards.

It is boarded by the Pacific Highway, Friedlander Place and Nicholson Street. The Pacific highway is a large designated “major” 6 lane transport road managed by Roads and Maritime Services.

Nicholson Street is a minor local roadway which essentially is two lanes with metered parking on the eastern and western sides. Access to Nicholson Street is primarily gained via Oxley Street, with limited access via Christie Street.

These streets are predominantly utilised by residents in Oxley Street, the patrons of the Aquatic Centre/ Child Care Centre Fitness First complex along with other Commercial business offices in Nicholson Street and Christie Street.

Currently the site is occupied by predominantly 5 levels of Commercial Offices with ground floor retail space. The site for the proposed development currently also houses a Wilson Public Car Park patroned by local Commercial business.

This site is the subject of a Development Application proposing Commercial, retail, residential and a Child Care Centre along with a “public space”. Each use carries its own specific CPTED considerations which will be outlined.

Police have identified that Development Application DA222/14 has been lodged with Lane Cove Council and have conducted the following assessment using the Crime Prevention Through Environmental Design principles.

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 environmental and social conditions that:

- Maximize risk to offenders (increasing the likelihood of detection, challenge

and apprehension).

- 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, minimizing or concealing crime attractors and rewards) and
- Minimise excuse making opportunities (removing conditions that encourage/facilitate rationalization of inappropriate behaviour)

CPTED employs four key strategies. These are surveillance, access control, territorial re-enforcement and space/activity management. The following recommendations have used these strategies when responding.

A crime risk assessment was completed at this site and it was determined that there was a Moderate/High risk.

This decision was based on the following:

- Proposed child care centre and its location in the building plan
- Proposed location of evacuation point
- Existing crime statistics of similarly built up areas
- Accessibility of the site to unauthorised traffic

Consideration has also been given to the current threat environment for terrorist acts when carrying out this assessment based on its proposed use as stated in page 54 of the Statement of Environmental Effects (SEE).

Police recommend that Lane Cove Council require specific Development Consent be obtained by the operators of all the retail sites and Child Care Centre prior to their occupation and use of the property.

The reason being that each use proposed use may require specific security and safety treatment options to ensure that all users of this site are provided with the maximum opportunity to work, live and use this site in a safe and secure manner.

Referring to 6.2.11 of the SEE Police recommend that due to the proposal having a mix of uses on the site, i.e. retail, commercial and residential, a separate development consent is sought for each proposed occupier of the retail/commercial space.

Surveillance:

A review of the SEE has been conducted and the following issues have been identified;

CCTV systems assist in deterring crime and anti social behaviour; it also assists in venue and asset management and facilitates the investigation and resolution of incidents.

Overall Police recommend that a CCTV system (using CCTV compliant to the AS/NZS 4806 standards) be installed for the entire complex covering each use as outlined below.

- It is recommended that this system be centrally managed by an appropriately acquired "Building Manager" who has access to the CCTV 24 hours a day.
- The CCTV system must have the capability for facial recognition. Footage must be stored/ retained by the Building Manager/ and or security company for a minimum of 30 Days.
- Building Management must ensure that no staff has the capability to delete footage within that 30 day period.
- In the event of a power failure the system should have adequate capability to continue to record for at least 15 minutes.

Car park:

The plans and accompanying documents note the DA proposes a 5 level car park which will include 520 car spaces.

- *315 allocated for residential tenants, 57 for visitors and 114 accessible, there are 15 allocated for offices, 94 for retail, 26 proposed for the 24 hour gym and 13 for the child care.*

Car parks require specific security and surveillance considerations. It should be noted that it is not uncommon for large scale multi level car parks such as the one subject to this DA, to become soft target location for crimes such as Steal from Motor Vehicle, or Steal Motor Vehicle, malicious damage and other associated theft.

Recommendations are:- that there be a clear definition of access to the car park areas for Retail/ Commercial and residential.

It is recommended that a roller door or something similar be installed to provide further access control to the residential parking areas which also house residential storage areas and bicycle cages. This roller door access should also be controlled by electronic security access further adding to minimising the access of individuals that are not residents of the premises. This may reduce further the risk and frequency of break and enters and thefts from residential storage which is an emerging crime trend across Sydney and the North Shore.

Police would also suggest that an allowance be made that would permit the residents or developer to install an alarm system in their garages/storage areas that would be connected to the relevant unit (i.e. the developer either installs the alarm system throughout the site or provides cabling or wireless connectivity between the unit and the garage/storage area). The alarm would alert the residents in a timely manner to any unauthorised access to their garages/storage areas so that Police can be called as soon as possible.

It is also highly recommended that a "standoff" area be constructed around the building core and incorporated into this DA. If a hostile vehicle is able to attack a building's structural core, there is a chance of progressive collapse. Restricting vehicle impact and access can reduce blast loading from deliberate attack.

When it comes to building security and safety it can be said that, Security perimeters may be enlarged to decrease the likelihood and severity of damage from a bomb blast, particularly from vehicle bombs. The greater this standoff distance, the less hardening a building may require. Effective standoff distances are easier to achieve when integrated into the original design and construction. In dense urban areas, safe standoff distances are nearly impossible to achieve, necessitating other security measures (AIA Best Practices*).

It is also recommended that all public parking be provided away from the building core i.e. only available to residents with electronic security access.

Bicycle Cages and Residential Storage Cages:

The revised plans submitted by Mirvac include a large number of bicycle cages and storage cages for residential tenants to this development.

Police strongly recommend a review of the placement/ construction and security treatments of these cages. Bicycle theft particularly across Metropolitan Sydney is a recurrent problem particularly for large scale residential unit complexes. Break ins of storage cage unit in garage areas of residential complexes such as the one proposed in this current DA are now more common than break and enters of the resident units themselves.

Due to design, material/construction and lack of suitable security treatments for the garage complex and the storage cage themselves, residential developers create a large opportunity for thieves to commit crimes of break in and theft.

Police strongly recommend that the construction of the storage cages not be wire caging, that these areas are constructed of solid materials that also prevent access physically and visually to the goods/items stored within. Wire caging is easily accessed/ cut with simple tool easily obtained from any hardware store; this is a common method of entry that police see across Sydney.

North Shore LAC and other areas on the North Shore experience regular incidents of theft of bicycles and break ins of garage areas and storage units within residential complexes.

CCTV coverage is not sufficient in providing adequate Crime Prevention treatments to these areas.

It is however recommended that suitable coverage of all storage areas/ cages and units be included in the CCTV footprint of the overall development.

As St Leonards is becoming a business district with a busy public transport hub, this increases the transient nature of the population which may also increase the likelihood of incidents of theft and other associated crimes to occur.

For this reason a it is recommended that a thorough review of security measures for the car park space be conducted to ensure that all treatments maximise both the natural and physical surveillance options.

*AIA Best Practices *Building Security: Basic Design Elements* Available from <http://www.aia.org/aiaucmp/groups/secure/documents/pdf/aiap016370.pdf>

Natural Surveillance: In car park areas consideration must be made to reduce the possibility of creating natural barriers, ensure clear sight lines on car park levels. Adequate and clear lighting on all car park levels is essential to ensure no dark or shadowed areas. Clear marking of exits, fire exits and pedestrian paths by the use of signage and painted pathways is also important to create clear pathways.

Technical Surveillance:

Recommendation: All car park areas must be covered by CCTV, particularly at the entry and exit points, along with all levels and ramps. All areas of the car park should also be appropriately signed, e.g., "CCTV is in operation 24 hours a day".

Retail/ Commercial:

Consideration should be made as to the public access routes for these areas of the development.

All access routes should be open well lit and appropriately signed. Avoiding narrow pathways or hallways as they create a sense of lack of security and reduced natural surveillance.

Technical surveillance:

Entry and or access points to each Retail/Commercial tenancy should be adequately covered by CCTV cameras; these cameras should be managed by the "Property Management".

Lift/ foyer areas:

These areas must be covered by CCTV cameras to ensure should an incident occur persons who have gained access to the property can be clearly identified when required.

Considerations should be given to ensuring that residential lifts can only be accessed by residents. Electronic security access only would ensure these considerations are addressed.

Child Care Centre:

This specific use requires quite detailed and specific security and safety requirements which must be considered at development stage to ensure that all safety/security aspects are appropriately adhered to in preparation for occupancy. Child Care centres are unique, and have specific requirements regarding access, evacuation procedures and surveillance.

Provision must be considered for parents utilising the centre to access the site securely, is the car parking space allocated for staff and/or parents attending the centre.

Security doors or controls must be installed at development/construction stage for the Child Care Centre.

It is imperative that the Child Care Centre have its own security system and specific access control and Child Protection protocols must be adhered to. Restricted access to this area of the complex must be managed.

- Consideration for the installation of gates
- Single access main access point to child care centre
- Consideration to accessibility, egress routes for Evacuation purposes, this centre must be able to easily evacuate children who are not mobile and may require being moved via cot/ pram etc and being carried by Centre staff.

CCTV coverage of entry points to the centre should also be managed and installed again to enhance security of the property and to assist with identification of persons accessing site before, during and after hours.

- Concern is held as to the ability of "residents" in the towers to observe the outdoor play area of the child care centre.

** Police recommend that a review be made as to the capacity for most if not all residential units to see into the Child Care Centre.

NOTE: It is recommended that where possible this ability/visual capacity be restricted somewhat for reasons relating to **Child Protection**.

The children who use this space have a right to privacy as does tenants of the residential complex. It certainly is less than ideal to allow such extensive "surveillance" from the private residential dwellings on to this outdoor play area.

There is also a concern for the possibility of objects falling or being thrown from the balconies or windows of the residential units in both towers that overlook the outdoor play area of the child care centre. The current design which consists of an open outdoor play area leaves this area of the proposed child care exposed to such possible risks and should also be a consideration in regards to safety concerns.

Police have read and considered the submission supplied by Beaware Solutions and have noted the following:-

The information in this document does not address specifically any direct concerns or risks posed at this site.

It does not outline how operators will overcome the significant risk when attempting to evacuate children with limited if no mobility from a premises that is on the second floor and requires the use of stairs. Child Care Centres do operate with specific child to educator ratios; however, this does not overcome the possibility of two teachers attempting to evacuate 8 infants who are not able to walk, in an emergency evacuation. Police strongly recommend consideration to find an alternative location on this site for a Child Care Centre which will provide direct access to road/street/footpath.

There is a significant concern as to where the current nominated evacuation point is situated for this site. It must be noted that this site is bound by a 6 lane Highway to the east and a narrow access street to the west. At this stage Police do not believe there is a suitable evacuation assembly area for the Child Care Centre and residents at this site.

The emergency exit route currently outlined in the Evacuation Diagram only provides Tower 2 with one route to exit from. Police have concerns that in the event of an emergency that occurs in the 'open space' area located between the two towers, the residence and occupants of the Child Care Centre will be limited to one exit only that will funnel them into the path of potential danger.

Consideration must also be given to the retail outlets that also have only one way to exit their premises which also front onto the 'open space' area in the event of an emergency occurring in the 'open space' area. Police recommend that the retail outlets be provided with a rear access that opens onto the fire exit corridors.

There is also no information outlined in the Emergency Management Plan if consideration has been given to the possibility of an emergency situation that requires residents and other occupiers to remain inside the building. Police recommend that a P.A system be installed on all levels of the development, including the car park levels, that would allow Security, Concierge or Management to advise occupiers of the emergency situation and what is required of them. Again, if an emergency occurred in the 'open space' area, it may be more practicable for occupants to remain within the confines of the building. The use of the P.A system needs to be clearly defined in all EMP manuals to ensure that occupants know to follow any P.A announcements, contrary to what may be outlined in the emergency procedures manual.

Residential Units:

Natural Surveillance:

All pedestrian/ tenant access points into the residential areas of the complex should be clear, unobstructed and suitably lit. Lighting treatments must be considered to enhance security of the area but also not be obtrusive at night. Lighting must also complement any Technical CCTV system ensuring that it is not over exposing facial areas, and also providing suitable and enough light to support the system for adequate facial recognition.

Recommendation is made to ensure all foyer space on each residential floor and also lifts and fire exits are suitably covered with CCTV.

It should be noted that adequate access control can also support CCTV systems in the overall security of a property.

The security of a premises can be compromised by offenders who commonly access supposed "secure" foyers or through fire exits and car parks.

Recommended Conditions of Consent:

- Installation of CCTV system/network for proposed complex.
- Specific building management employed to maintain CCTV system, facilitate access to Police and/Council staff when required.
- CCTV to be stored for minimum of 30 days.
- Staff should be suitably trained to access CCTV and download footage.

- Sufficient cameras to be installed to cover all external entrances/exits of the complex and public areas readily used by residents/ commercial and retail staff/ general public.

Lighting:

Good lighting can assist in the use and appeal of an area. There is a proven correlation between poor lighting and fear of crime. The more easily a person is able to be seen the opportunistic nature of the crime decreases.

Lighting can support other safety and security measures such as CCTV if installed correctly.

- All areas readily accessed and used by occupants of the development must be covered by suitable lighting treatments.
The main/primary residential entry as designated within the DA documents is being the corner of the Pacific Highway and Friedlander Place with a secondary entry at the southern entry of the Pacific Highway.

- All entry points to the residential areas of the Development must be appropriately signed and clearly lit during darkness.
- All entry points/drive ways to the car parks must also be clearly sign posted and well lit during darkness. This provides clear messages for all users of the complex and differentiates the building/complex from other commercial spaces.
- These areas must be adequately covered by CCTV systems which are able to identify make, colour and registration plates of all vehicles entering and exiting the complex.

Access Control:

Access control is used to increase the time and effort required to commit crime and to increase the risk to criminals.

As this property is designated for several different types of uses, this requires specific review of each type of use and their needs as to security and access restriction.

Access Control is imperative specifically for the Residential Towers along with the Child Care Centre specifically. However both occupants require different security treatments.

Mailboxes:

Consideration in the current plans and related documents subject to this DA have not addressed the security and access control of the Mail Boxes for all users of this site.

Currently there is a large and well documented trend of theft from Mail Boxes and subsequent frauds from complexes similar to this outlined in the DA. This trend is being experienced not only within the Lane Cove LGA and Willoughby LGA but across the Sydney Metropolitan Area.

- Should mail boxes be installed at this site they must be enclosed within the Building structure with front facing either area accessed by general public/Australia Post etc.
- All mailboxes should have suitable individual security design features to ensure no unauthorised access from the "public" side other than to deposit mail.
- The rear should have individual key locks and not utilise standard "mail key" as this key is easily replicated by crime gangs for the direct purpose to gain entry to multiple mail boxes at large newly developed residential and commercial sites.

Electronic security access:

Should control access to;

- Car park
- Residential towers –(foyer after hours)
- Lifts (and each floor)
- Commercial levels
- Child Care
- Gym

Intercom systems:

Should also be installed in the car park and at each entry door to the foyer area for the residential towers which can be utilised by visitors.

Police recommend that should this Development be approved, consideration should be given for a Concierge to be employed and on site during business hours each weekday.

A concierge assists with the management/ safety and security of the complex, provides clear information and direction to all users of the space.

Glass and windows:

Police recommend that all windows fitted to the residential towers and Child Care Centre have window safety devices installed in line with Schedule 1 Amendment of Strata Scheme Management Act 1996 No 138 Section 64A Window safety devices – child safety (with consideration given to Schedule 1 Amendment of Strata Scheme Management Regulation 2010 clause 31). It is understood that this recommendation isn't an obligation of the developer until 13th March 2018 but would be more practical to be carried out during the construction phase of this development due to the large number of windows in the facility.

Further to this, it would also be recommended that windows installed within the development (retail, residential, commercial and Child Care) consist of laminated

glass fitted in specified frames. Laminated glass offers many advantages. Safety and security are the best-known of these -- rather than shattering on impact laminated glass is held together by the interlayer, reducing the safety hazard associated with shattered glass fragments, as well as, to some degree, the security risks associated with easy penetration. With the numerous number of windows in this development there is always a safety risk that windows could be broken causing fragments to fall to the areas utilised by customers, consumers and occupants (such as children in the Child Care Centre). Laminated glass would help to eliminate this risk. Security glass would be preferable due to its resistance to physical attack, ballistic and bomb blasts, however, considerations have been made that it may not be economically viable to the developer to use this type of glass for the development.

Open area (Plaza):

In view of the heightened risk of terrorism, police are concerned that the open planned area could be easily accessed by a hostile vehicle from the Pacific Highway due to the lack of perceived barrier between the road and the open area. This lack of perceived barrier could also allow for the access of a vehicle involved in a collision to enter the Plaza area. Police highly recommend that a passive barrier be installed along the length of the plaza opening to eliminate the chances of any vehicles (hostile or not) from entering the Plaza.

Further Concerns identified:

Traffic and Parking impact:

- Police have concerns regarding the number of visitor allocated car spaces. Using the RMS requirement (as quoted in the SEE), the visitor allocation should be 81.4 spaces; however, the current DA has only allocated 57 spaces (High density residential flat building for Metropolitan regional centres require 1 space per 7 units for visitor parking). This decrease in allocated visitor parking may have an impact on the community that currently utilise surrounding streets to park in.
- Specific traffic Management plan to be submitted for the "construction phase" of the development. Police believe there will be significant impact on the local community, business and residential, during this phase due to the limited access to this site and the limited parking currently available around the site. Consideration should be given during the demolition and construction phase to have those working on site, park their vehicles away from the location to eliminate the impact on the community that currently use this area for their daily parking needs.
- Concern regarding impact on local roads of the developed site due to insufficient of street parking allocated to the Residential component of the development. Police recommend that a review of the estimates supplied within the accompanying documents be completed. It is acknowledged that the site is in proximity of St Leonards Train Station however the current

development experienced in neighbouring areas such as Chatswood are having a flow on effect on parking within the CBD area and surrounding streets.

- Further, during demolition and construction the appropriate signage, fencing and restricted access should be maintained in areas that are under construction. Minimal impact to the Pacific Highway traffic is highly recommended due to the large number of vehicles using this highway on a daily basis i.e. limit the number of deliveries to the site that require the use of the Pacific Highway to enter the demolition/construction site.
- Police continue to hold concern as to the traffic impact of the surrounding area. It is imperative to acknowledge that currently there is significant restriction to traffic access to Christie Street which will be a proposed access point to the car park of this site. At this current time it appears that Nicholson Street and Oxley Street are the only direct exit routes for traffic coming two and from this site.
- It is not unreasonable to consider that this development will generate significantly more traffic in Nicholson Street and Oxley Street to the proposed residential complex and Retail and Commercial offerings which will be utilised by the wider Community not simply those who reside in the building.

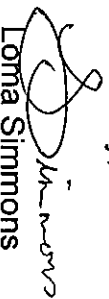
Evacuation Plan:

Police submit that for a development of such size and propensity, a thorough evacuation plan should and must be prepared. The document should be subject to review and comment by Police, Fire and Rescue NSW and other relevant authorities.

Conclusion

North Shore Local Area Command appreciates your efforts in relation to Crime Prevention and looks forward in continuing to work with you in this field. We thank you for the opportunity of inspecting the plans for this development and should you require further information on the subjects mentioned within this report please feel free to contact Constable Loma Simmons, Crime Prevention Officer, North Shore LAC, phone 9414 8518 or email on simm1lom@police.nsw.gov.au

Sincerely,



Loma Simmons

Constable

Crime Prevention Officer

North Shore LAC

8th December 2015