



17 December 2015

The General Manager
Lane Cove Council
48 Longueville Road
Lane Cove NSW 2066

Attention: Rebecka Groth – Senior Town Planner

Dear Rebecka,

**RE: 472 - 494 Pacific Highway St Leonards - DA 222/2014
Safer By Design Security Assessment**

We refer to Safer by Design Security Assessment completed by the NSW Police Force - North Shore Local Area Command dated 8 December 2015 and respond as follows.

For ease of reference we have numbered each page of the assessment starting from Page 1. The text noted in ***bold/underline/italics*** are the actions we noted in the letter requiring a response.

Page 3

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

Mirvac would be agreeable to Council nominating a consent condition to the above effect.

Pages 3 & 4

"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 capacity 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."***

Mirvac would be agreeable to Council nominating a consent condition to the above effect.

Page 4

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

The building access points have been designed with clear definition of access as per this recommendation.

"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 trend across Sydney and the North Shore"

We confirm that Mirvac proposes to install electronic security roller shutter/door access control points into and out of the basement and located at strategic points throughout basement areas. The process of identifying optimal roller shutter/door and security reader access points would be something that Mirvac normally undertakes as part of the detailed design process in consultation with relevant expert consultants and further, during construction with specialist contractors.

"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"

We thank the Police for this suggestion and provide the following commentary;

- Car spaces will not be individually enclosed.
- All storage spaces are proposed to be caged chain wire areas which will be capable of being locked. Open cages assist with sight lines and active and passive surveillance.
- CCTV will be strategically located throughout the basement carpark, lift core areas, storage area zones, bicycle parking areas etc.
- Where possible zones will be created at storage areas, and authorised security pass access only will provide entry. These areas can be investigated as part of the detailed design process.
- Concierge, Building Management and Loading Dock Management staff will be employed at the completed building and will be required to take an active role in the safety and security of the building.
- As part of the handover to future residents it will be emphasised in the Owner's Manuals and building rules i.e. Strata By-Laws, that Owners and Tenants should ensure that items of significant value are not stored in storage cages in the basement, and that they should also keep and maintain relevant insurances for their vehicles and any items they may wish to store in the basement.

For the reasons outlined above and based on the reasonable practicality of installing an alarm system for each small storage space connected back to every apartment, this suggestion is not considered appropriate nor viable. Mirvac therefore proposes not to implement the proposed suggestion.

"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."

The development proposal is a predominant residential building with non-hostile uses proposed. It is unlikely to incorporate any government entities and will not be a religious point of interest.

Beaware Solutions has undertaken a terrorist threat assessment which was provided to Council on 19 December 2015. The report outlines that the Likelihood of an attack occurring is negligible to low, and the risk of a terrorist attack would be greater for other buildings, e.g. The Forum, where there is heavy pedestrian traffic entering/leaving St Leonards Railway Station and the ability to disable part of the city rail system.

Notwithstanding the above, it is not possible to feasibly construct a standoff area around the building core, as this would severely affect the building and basement design. Evacuation distances which will be applied within the Emergency Management Plan in the event an incident did take place are shown in the Table below.

An Australian Government Initiative

Bomb Threat Evacuation Guide

THREAT	DESCRIPTION	EXPLOSIVE QTY	MIN ¹ (m)	MAX ² (m)
	Pipe Bomb Small	100g	80	575
	Pipe Bomb Medium	500g	100	860
	Pipe Bomb Large	2.5kg	130	1,135
	Briefcase/Suitcase	23kg	185	1,520
	Compact Sedan	230kg	270	1,915
	Sedan	450kg	300	2,030
	Passenger/Cargo Van	1,800kg	375	2,410
	Small Moving Van/Delivery Truck	4,540kg	440	3,280
	Large Moving Van/Delivery Truck	13,600kg	525	4,730

Radio or mobile phone transmissions: min. of 25m from the device is recommended as the safe distance for transmissions.
¹ The min. withdrawal distance is intended for use by essential personnel with adequate frontal and over head protection.
² The max. evacuation distance is governed by the greater of the throw distance for fragmentation or the glass breakage/falling hazard distance.

This means that should an incident occur, the minimum distance that people will be directed to be from the identified area is the yellow column, in metres, and provided that they have adequate frontal and overhead protection.

We understand from Beaware Solutions, the stand-off distances and strategies are a procedural issue which will be incorporated in an operational response as part of the Evacuation Management Plan post occupation.

In addition we have been advised by our structural engineer that the lift core structures and columns will be designed with extremely high strength concrete and steel for significant impact loads.

Page 5

"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."

There are 84 publically accessible car parking spaces that are associated with the proposed supermarket and a further 3 publically accessible drop of spaces for the proposed childcare. The remainder of the retail and commercial car parking spaces are proposed to be used by lot owners, tenants and employees of business's in those spaces.

Due to; the design of the building and basement, location of cores and associated access to the retail and commercial levels, split level nature of the basement, practicality of shoppers wanting to be located close to lifts for ease of access, and lack of physical space to make alterations to the basement due to efficiency of design, it is not possible to implement the suggested recommendation.

It is important to note that as per an earlier response in this letter, CCTV, roller shutters, access control, building security etc. will be provided to the retail and commercial parking areas. Proposed technology such as automatic number plate recognition will also be used which will assist in identifying vehicles entering and exiting the car park.

"Police strongly recommend a review of the placement/ construction and security treatment of these cages."

"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."

The location of storage areas are generally optimised based on carpark entries, access routes, building structures and, parking spaces taking priority. It is a delicate exercise to balance all of the needs required to make a basement design work with a tower above and we believe the location of the storage spaces optimises visual surveillance, access, safety, security and convenience for future residents.

As outlined earlier in this letter, there will be amongst other items, security access control and active safety and surveillance measures implemented in the basement and building.

We also advise that making storage spaces solid will have an effect on basement sprinkler and mechanical services, as they are designed to be unsolid to withstand wetting and facilitate airflow. In addition solid walls could promote other issues resulting from dangerous goods being stored or items being neglected.

Chain wire cages help promote passive and active surveillance throughout the basement areas as opposed to impervious solid walls around storage cages, as they provide clear sight lines and will also allow the CCTV to be more effective.

For reasons outlined above, Mirvac does not propose to change from its current proposal to create storage spaces as designed, in chain wire with gated doors that can be secured/locked by owners and tenants.

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

We confirm that Mirvac intends to install a CCTV system that it believes appropriate for the entire project with reference to a specialist consultant during detailed design and closer to completion and operation of the building.

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

We believe that the design of the basement has undergone significant review and optimisation factoring into account natural and physical surveillance. With the overlay of the access control and security systems that will be implemented as part of the detailed design we believe what has been done and will be carried out is sufficient. Mirvac prides itself on completing quality projects and we have not had any significant issues with our projects over our 42+ year history.

Notwithstanding the above, during the detailed design and co-ordination process the design team will again review the basement design and if there are any opportunities to improve security measures, these shall be implemented.

Page 6

"Natural Surveillance:"

The items noted in this paragraph will be taken into consideration as part of the detailed design and implemented as appropriate.

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

It is not practical or feasible to have CCTV installed to “All” areas of the carpark. Most certainly a comprehensive CCTV system will be installed which will cover all entry and exit points together with all key areas of the basement such as selected ramps and floors. Additionally CCTV will be installed at lift lobby locations on each basement level. Residential lift lobbies in the basement are also proposed to be secured with glazing partitions and security access only. This provides an additional layer of security for all building residents.

Car park areas will be appropriately signed to advise of 24 hours a day CCTV use.

“Retail/ Commercial: All access routes should be open well lit and appropriately signed”

The proposed design will meet this requirement.

“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”.”

We confirm that CCTV will be placed to provide appropriate coverage to the retail and commercial areas and will be connected to and managed by the building management systems.

“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.”

We confirm that CCTV will be provided to lift/ foyer areas.

“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.”

We confirm that electronic security access will be provided to all residential lifts so that they are only accessible by residents.

As mentioned above, residential lift lobbies in the basement are also proposed to be secured with glazing partitions and security access only. This provides an additional layer of security for all building residents.

Pages 6 & 7

“Child Care Centre” and items raised in relation to the proposed childcare centre under **“Police have read and considered the submission supplied by Beaware Solutions and have noted the following:-“**

We note that the Police are raising significant concerns in relation to the proposed child care centre, including the strong recommendation to find an alternative location on the site with direct access to road/street/footpath. This would not be possible in the subject development proposal as there would not be a way of providing associated outdoor space which is required for child care centres.

Unrelated to the feedback provided by the Police, we also note that concerns have been raised by Council's SEPP 65 consultant as to the amount of communal open space proposed to be provided in the development being less than the area recommended by the RFDC. Other concerns being raised (in the past) also relating to noise from the proposed child care centre affecting residential apartments and traffic generation.

Accordingly, if all of these concerns are matters which will preclude a favourable development determination being made, the child care centre use could be deleted and the internal space reallocated to retail/ commercial office uses and the outdoor area being changed to communal open space for residents of the buildings.

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

Evacuation point – The evacuation diagram provided with the Beaware Solutions document was a sample of format rather than instruction regarding assembly areas. Beaware Solutions has advised the size of the development would require possibly 3-4 Assembly Areas, with evacuation routes dependent on the actual threat. For example, if there was a toxic spill on the Pacific Highway outside the building the evacuation would be toward Nicholson Street and upwind.

The purpose of engaging Beaware solutions who are experts in the field, was to demonstrate to Council that an Emergency Management Plan is capable of being created for the development and will be undertaken as part of the detailed design post development determination and once more is known about the detailed building services, systems and users.

Greg Muir from Beaware Solutions has been developing and implementing Emergency Management Plans and procedures for the last 10 years. He has provided plans for buildings such as The Hyde, Liverpool Street, Sydney, the hotel and multi-use convention centre known as Hyde Park Plaza, College Street, Sydney, and Cammeray Square, a retail/commercial/residential complex with multiple towers.

The final Emergency Management Plan will include, inter alia, all risks and threats associated with the building, control measures, responses and evacuation strategies. It is envisaged the document itself will be very detailed. The Plan will be compliant to AS3745:2010 - *Planning for emergencies in facilities*. Key evacuation strategies will be clearly identified within the user-friendly Emergency Procedures Manuals. Building management will be required to keep in contact with local NSW Fire and Rescue and Police to brief them as to the fire-fighting capabilities and evacuation routes and strategies associated with the building and occupants.

As was mentioned in the document that was prepared by Beaware Solutions for the Development Application, Greg has had 32 years as an operational Police officer, including significant training in Emergency Management, and as a relieving Local Area Commander performed the role of Local Emergency Operations Controller. He was attached to both Chatswood and North Sydney for lengthy periods of time. He also has an Advanced Diploma in Public Safety (Emergency Management) and a Certificate IV in Security and Risk Management, as well as being a Lead Auditor in Work Health and Safety Management Systems.

Following Greg's review of the building design, his awareness of the local area, and with his experience and qualifications, he sees no reason why an effective Emergency Management/Evacuation Plan cannot be developed and implemented for the building.

Therefore, the Emergency Management Plan will incorporate strategies for all types of emergencies and be a considered document by an expert who is a specialist in the field.

It is worthwhile noting under this point that the building has been designed and will be constructed in accordance with all relevant standards including the Building Code of Australia. Therefore, with expert advice as part of the detailed design phase there should be no reason why a suitable Emergency Management Plan cannot be created and implemented.

Retail outlets – Retail outlets will be designed to meet relevant codes including meeting any evacuation requirements. At this stage the facades are shown as a glazing line only and shops may have multiple entries/exits.

Accordingly, the Police's recommendation will be considered as part of the detailed design and be implemented if possible or required by the codes however, in the event where it would reduce the amount of floor space or lead to a result which would be contrary to the relevant codes, then the recommendation of the Police would not be implemented.

Consideration of an emergency situation that requires residents and other occupiers to remain in the building – Following on from the response provided two points above, The Emergency Management Plan and Procedures Manuals will have different strategies for emergency response, including 'shelter in place' or Lockdown Procedures. This would be typical of any building in the event where residents or occupiers would need to remain in the building. The Emergency Warning and Intercommunication System for the building will have a Public Address System for use in the event of emergencies requiring same. This item will therefore be comprehensively covered.

Page 8

"Natural surveillance"

We confirm that we will meet the requirements of the paragraph outlined by the Police under this heading.

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

We confirm that CCTV will be provided to all lifts, fire exits, main building entry and exit points, amenities areas and ground floor lift lobbies.

Mirvac would not typically provide CCTV on each foyer space on each residential floor and is not proposing to do so in this development. We are unaware why this would actually be required as the building will feature a comprehensive CCTV system to all key areas, security access control, concierge - building – and loading dock management, intercom systems, restricted access control, clear delineation of uses and access, signage etc.

These measures will provide ample safety and security which will not be enhanced having extra cameras on each residential floor.

Pages 8 and 9

"Recommended Conditions of Consent:"

- **Installation of CCTV system/network for proposed complex.** – Mirvac agrees.
- **Specific building management employed to maintain CCTV system, facilitate access to Police and/Council staff when required.** – Mirvac confirms that it proposes concierge/building management services to the development. Part of the scope of these services will be to maintain the CCTV system and facilitate access to Police and/Council staff when required.
- **CCTV to be stored for minimum 30 days.** – Mirvac agrees.
- **Staff should be suitably trained to access CCTV and download footage.** – Mirvac agrees.
- **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."** – Mirvac agrees.

Page 9

"Lighting"

Mirvac agrees with the 4 bullet points listed under this section and would have carried these recommendations out in any event.

"Access Control:"

We confirm that an access control system will be installed at the property and the access control system will be tailored to the several different types of uses in the proposed development and their specific needs.

Pages 9 and 10

"Mailboxes"

We are confused by the Police's comments as the plans show enclosed mail rooms within the building structure that are facing an area accessed by general public/Australia post. These rooms will be security controlled.

Appropriate mail boxes will be installed in these rooms with CCTV to also be installed in them. Also note that the mail box rooms are located adjacent and opposite residential lobby areas which will benefit from ongoing active occupants surveillance. Furthermore, the concierge's desk is situated opposite the proposed mail rooms and will provide strong surveillance over the mail room areas.

In relation to retail and commercial mail, generally mail will either be delivered directly to each tenancy or managed by the tenants own private mail service e.g. post office box.

Page 10

"Electronic security access:"

Agreed that the electronic security access will control access to the areas nominated by the Police. This would have always been the case.

"Intercom Systems:"

We confirm that an intercom system will be installed to the carpark and at each entry door to the foyer area for the residential towers which can be utilised by visitors.

We also confirm that it is intended that concierge facilities will be employed at the site.

Pages 10 and 11

"Glass and windows:"

The Police's recommendations under this section go above and beyond Australian Standards and relevant rules and regulations that apply to the building industry.

Mirvac does not propose that the suggested recommendations for this item are implemented on this project. Being forced to do so would be excessive, unreasonable and be over and above statutory requirements. It would cause significant economic viability impacts which are unfeasible.

It is worthwhile pointing out that a terrorist threat assessment was carried out by Beaware Solutions, and their recommendation in relation to glazing was for Level 2 only to be laminated glass or other appropriate glazing system. Mirvac does propose to carry out this recommendation.

Page 11

"Open area (Plaza):"

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."

As per the landscaping plans, raised planters are proposed to the plaza area. Public art and a proposed water feature also are located in the plaza area. There are also street trees along Pacific Highway.

We understood that Council's aim for the plaza area was to create an open transparent zone which would seamlessly integrate with Friedlander Place.

If Council believe that any more deterrents than those mentioned above are required, then this could be conditioned as part of a development consent.

Pages 11 and 12

"Traffic and Parking impact:"

We note that Lane Cove Council is undertaking the traffic and parking assessment and Mirvac is separately working through the items raised by Council in relation to these matters.

Mirvac will continue to work with Lane Cove Council in relation to these matters.

We do provide comment however that a Traffic Management Plan for the construction phase of the project was submitted as part of the Development Application. This document was completed by Calibre Consulting.

Page 12

"Evacuation Plan:"

As outlined in this letter, Mirvac is committed to completing an Emergency Management/Evacuation Plan. The timing of this plan is most appropriate following development determination in conjunction with detailed building design, during which time more will be known about the building services, operation, and tenants etc.

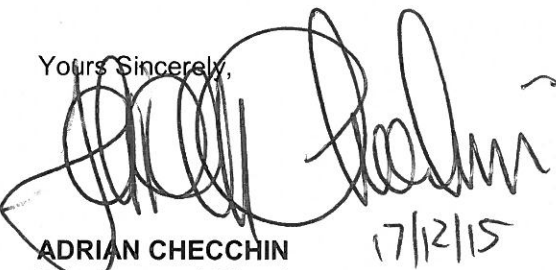
Mirvac would be happy for Council to impose a consent condition that that the Emergency Management/Evacuation Management plan must be completed for review and comment by Police, Fire and Rescue NSW and Council prior to occupation of the building. We would also appreciate a timeframe being nominated in the proposed consent condition e.g. 30 days for the Police, Fire and Rescue NSW and Council to respond with any comments, as we would need to avoid a situation where an extensively long review process could affect habitation of the buildings.

Moving Forward

We trust the information contained herein provides further detail on the items raised and provides comfort as to the safe, high quality nature of the Mirvac proposal. However, should Council require any further details, please feel free to contact the undersigned on 0412 877 052.

We look forward to progression of our application and determination by the JRPP at their earliest convenience.

Yours Sincerely,


ADRIAN CHECCHIN
Development Director

17/12/15