

# HARRIS CRIME PREVENTION SERVICES

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## Crime Risk and Crime Prevention Through Environmental Design (CPTED) Consultancy

### FINAL REPORT

in relation to a

## Concept Urban Design

Lots 177/874171, 55/874170-  
559 Anambah Road Gosforth NSW

for

VARA Consulting

on behalf of

The Trustee for Third.I Anambah Unit Trust

28<sup>th</sup> May 2025

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**Crime Prevention Through Environmental Design (CPTED) Consultancy  
in relation to the Concept Design for Residential Development,  
Lots 177/874171, 55/874170- 559 Anambah Road Gosforth NSW**

**THE REPORT**

**1 Engagement and Development Overview**

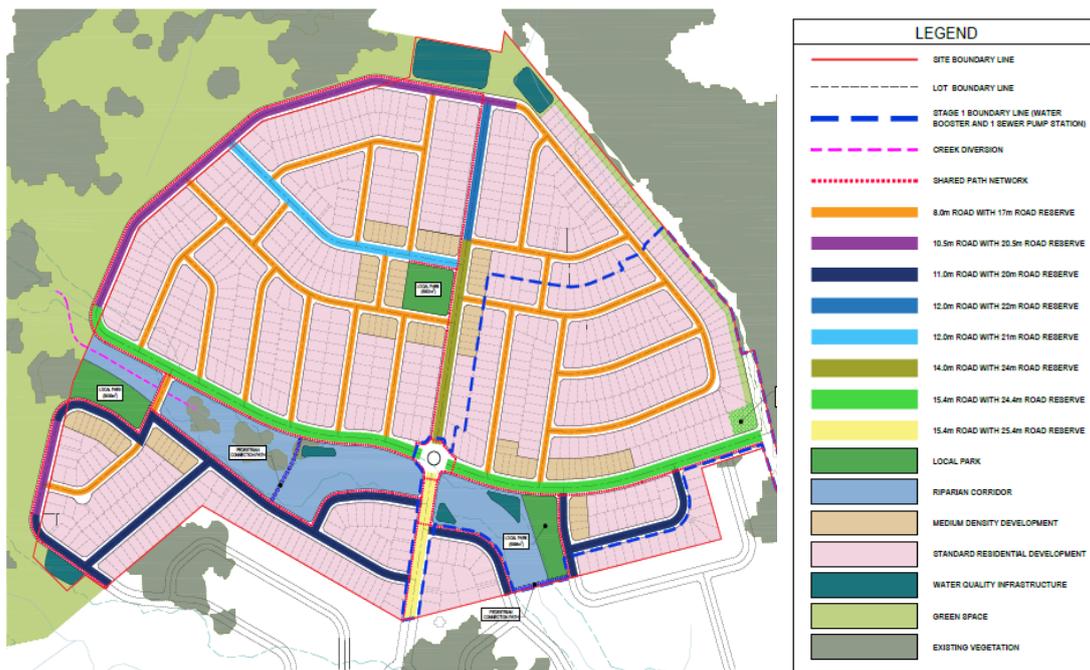
Harris Crime Prevention Services (Harris) has been engaged to provide a Crime Risk and Crime Prevention Through Environmental Design (CPTED) consultancy to Vara Consulting, on behalf of Third.I Anambah Unit Trust.

The residential development (the development or project) comprises Lots 177/874171, 55/874170 at 559 Anambah Road Gosforth NSW. The proposed staged sub-division is a 'green field' site. The adjacent land holdings are rural and the nearest suburb is Rutherford, some 10 kms to the south along a sealed road. Maitland airport is located within the Rutherford urban zone. The nearest public and 24-hour police station is also at Maitland.

*“The subject site is split zoned, being R1 (General Residential) and RU2 (Rural Landscape), pursuant to the Maitland Local Environmental Plan (MLEP) 2011. The proposed development is defined as a Concept Master Plan and Stage 1 Residential Subdivision which is permissible with consent under Clause 2.6 of the MLEP, and Division 4.4 of the EP&A Act 1979.”* (Maitland City Council Pre-Lodgement Minutes – July 2024)

This report is in response to a request by the Council for a CPTED report on the proposed concept design, comprising 900 lots. This is a requirement under Section C.12 of Council’s Development Control Plan 2011 which notes: *“Crime Prevention through Environmental Design (CPTED) seeks to influence the design of buildings and places in ways that lessen or prevent the incidence of crime.”* The master plan design includes:

- parks, play and recreational areas
- internal roadways, footpaths, bicycle lanes
- lighting, landscaping and signage.



**Image 1 Revised master plan layout: May 2025 - Groundswell Engineers**

Our report has been undertaken with reference to Council's requirements and local police information on contextual crime risks, which could potentially (negatively) impact the positive 'welcoming-and-safe-place' outcomes for the total (all stages) development.

## 2 Report Structure

The report is structured as:

Section 1	engagement and development overview
Section 2	report structure
Section 3	scope, stakeholders and informing instruments
Section 4	CPTED aim, principles and the Harris approach
Section 5	the site and potential pre- and post-occupancy crime risks
Section 6	assessed crime risks to the development
Section 7	CPTED-applied principles for the development's risk mitigation outcomes
Section 8	compliance with legislation, regulation, planning and/or policy instrument
Section 9	overall consultancy summary
Section 10	references, and
Section 11	supporting Appendices 1 and 2.

## 3 Scope, Outcomes, Stakeholders and Informing Instruments-Standards

### 3.1 Consultancy Scope

The client-agreed scope has addressed crime risk and crime prevention (CPTED) solutions. Our consultants have:

- (i) clarified with the client the CPTED-related elements, as those elements support the specific crime prevention (security) objectives of the overall development
- (ii) identified CPTED applications regarding safe day-night inter and intra site (staged) connectivity between the development's residential footprint, streetscapes and open public spaces
- (iii) undertaken a site and (nearest) urban context visit to better understand the potential crime risks and interface between the development and possible future developments
- (iv) affirmed and/or recommended inclusion of architectural elements based on CPTED principles and outcomes, including spatial definition, natural and technical (CCTV) surveillance, access control, lighting, landscaping, signage and target hardening
- (v) obtained and assessed the latest relevant crime statistics and input from local police
- (vi) provided a CPTED report incorporating the Scope.

### 3.2 Expected Outcomes

Harris believes the development should 'model' a welcoming-and-safe-place reputation. This would:

- (i) enhance the architectural integrity and client objectives of the development
- (ii) holistically protect all assets – people, property, systems and infrastructure
- (iii) comply with the requirements of regulatory (Council) instruments and/or Standards
- (iv) meet the expectations of secondary stakeholders, e.g. insurers, auditors.

### 3.3 Key Stakeholders

Key stakeholder groups are:

- (i) Third.I Anambah Unit Trust and VARA Consulting
- (ii) future residents, visitors, (future) maintenance contractors and emergency personnel
- (iii) Maitland City Council
- (iv) NSW Police.

While each stakeholder will have different community safety expectations, their broad expectations are similar in that personal and property safety is a 'given' of the designing-out-crime objectives.

### 3.4 Informing Instruments

Our analyses, conclusions and recommendations are informed and/or underpinned by:

- (i) the NSW Environmental Planning and Assessment Act, 1979, as amended,
- (ii) Maitland City Council's Development Control Plan, 2011
- (iii) Maitland City Council Community Safety Plan
- (iv) NSW Police CPTED 'Check List'
- (v) data from the NSW Bureau of Crime Statistics and Research (BOCSAR).

The development's compliance with, or reference to, these instruments is covered in **Section 8**.

### 3.5 Supporting Standards

Our analysis and report are also influenced by two International Standards:

- (i) AS/ISO 31000:2018, *Risk Management Guidelines* provides a helpful framework to identify and manage any organisational risks, include crime risks,
- (ii) ISO 22341:2021 *Security and Resilience – Protective Security – Guidelines for Crime Prevention Through Environmental Design* provides an acknowledged international CPTED framework.

The report has two (supporting) appendices:

- Appendix 1 NSW Bureau of Crime Statistics and Research (BOCSAR) - reported crime statistics for Gosforth over five years, January 2020 to December 2024
- Appendix 2 The Risk Management Standard AS/ISO31000:2018 (the Standard), its relevance to the development.

### 3.6 Notes and Disclaimer

**Note 1** Harris' consultancy services are provided independently; i.e. we are not affiliated with, nor receive benefits from, any organisation that supplies security hardware, installs security systems, monitors alarm systems or provides guarding/patrol services. This independence is critical to the way we approach security solution options and recommendations.

**Note 2** The scope excluded the development/provision of a technical security brief, security systems design and specifications or lighting brief and specifications.

**Note 3** The commentary, assessment, conclusions and recommendations outlined in the report are based on information provided to Harris Crime Prevention Services at the time of this assignment.

**Disclaimer:** While our research and experience suggest CPTED can be adopted to reduce opportunities for crime, it is not possible to guarantee that actual crime will be reduced or eliminated if these suggestions and/or recommendations are implemented.

## 4 CPTED – Aim, Definitions and Principles

### 4.1 CPTED Consultancy Aim and Definitions

The overarching CPTED aim is for the development to become a ‘welcoming-and-safe-place’ for all stakeholders; that is residents, their visitors, contractors and emergency personnel.

Harris defines ‘welcoming and safe place’ as: *‘built form and public space environments where crime prevention has been a consideration of concept, master-planning, design development and construction processes to ensure a development’s overall (safe and secure) reputation’.*

We define CPTED as: *‘applying aspects of architecture, engineering and technology to all urban development proposals (projects) as an intentional environmental, welcoming-and-safe-place, crime prevention strategy.’*

### 4.2 CPTED Principles

Designing-out-crime by applying CPTED principles is an acknowledged crime prevention platform.

Our report is based on five acknowledged CPTED principles, adapted by Harris from the Moffatt (1983) CPTED framework. The principles underpin the report’s conclusions and recommendations.

- Principle 1 Territorial definition – clarity about spatial identify, separation, boundaries and purposes,
- Principle 2 Natural surveillance – architecture facilitating strong sightlines for ground plane, basement and/or upper-level observation and surveillance,
- Principle 3 Access control – access-egress definitions - who goes where, when and why,
- Principle 4 Activity support – the influences of (external) lighting, landscaping and signage,
- Principle 5 Target hardening – adding specific and robust architecture and technology.

## 5 The Site and Potential Pre- and Post- Occupancy Crime Risks

### 5.1 The Site

The site ‘flows’ over rolling pasture country surrounding the property at 559 Anambah Road. Other rural properties are adjacent and opposite the total (staged) development site. There is a watercourse and drainage reserve separating the lower lot portions. The site is (currently) bounded by adjoining rural or semi-rural properties, including dwellings.



Image 2 rural no 559 entry to the yet-to-be-developed lots - Harris



**Image 3** portion of the proposed residential master plan - Harris



**Image 4** two-lane sealed road, integral to the development; towards Rutherford - Harris

## 5.2 Potential Crime Risks

Given the 'green field' nature and location of the site, there are no immediate *contextual* crime risks. The crime risk information ordinarily obtained from the local (Maitland) Crime Prevention Officer in relation to the nearest urban context (Rutherford) has no bearing on the proposed development.

Similarly, the NSW Bureau of Crime Statistics and Research (BOCSAR) has a 'clean' reported crime history for Gosforth. This will change once this and future residential and/or mix use developments evolve. Once fully occupied, the usual crime risks and crime reports common to most other residential communities in NSW will emerge.

However, once construction starts, the development's footprint is vulnerable to any number of potential crime risks, pre and post occupancy.

The risk potential relates to dual timelines and processes in the development's evolution. The first risks are associated with the staged construction of civil works, intra-site streets, lighting and associated utilities infrastructure, dwellings and landscaping. The second risks relate to the post-construction/occupancy phase. Both risk 'sets' can be partly mitigated by CPTED intervention.

### 5.2.1 Important (Generic) Factors in Assessing Crime Risks

Predicting when, where, what, how and why internal and external risks can become threats and incidents targeting this (or any development) footprint, may be potentially influenced by:

- (i) the surrounding context's potential to 'attract' opportunities for anti-social or criminal behaviour
- (ii) time of day or night and weather conditions for such opportunities
- (iii) the emotional 'state' and motive of a person intending to commit an offence
- (iv) the intended targets – people and/or property, and
- (v) how easy or difficult it is to unlawfully gain access to sites and targets.

One or more of these factors are the opportunistic 'influencers' for anti-social and/or criminal behaviour crime risks targeting this development during construction and occupancy.

### 5.2.2 Construction and Pre-Occupancy

The main crime risks and offences likely to impact the evolving development, relate to the staged construction. In our experience, theft of, and/or damage to, on-site equipment and vehicles, has been notably increasing at numerous large and small development sites. Construction fencing is too often easily accessible, leaving sites vulnerable to opportunistic or meticulously planned criminal behaviour.

External streetlights and pole fittings, early streetscape plantings and newly installed appliances in partially completed dwellings, are prime targets for damage and/or theft.

The additional crime risk element for this development is its isolation. There is limited opportunity for day's end observation (surveillance) once 'gates' are closed.

### 5.2.3 Post-Construction and Occupancy

Potential for anti-social and criminal behaviour once dwellings are occupied, also relates to the 'newness' of the development. In our experience, would-be offenders will always 'test' new developments to look for weaknesses in security design and day-to-day activities. CPTED solutions aim to reduce or eliminate these 'security breach' opportunities.

## 6 The Harris-Assessed Crime Risk Summary

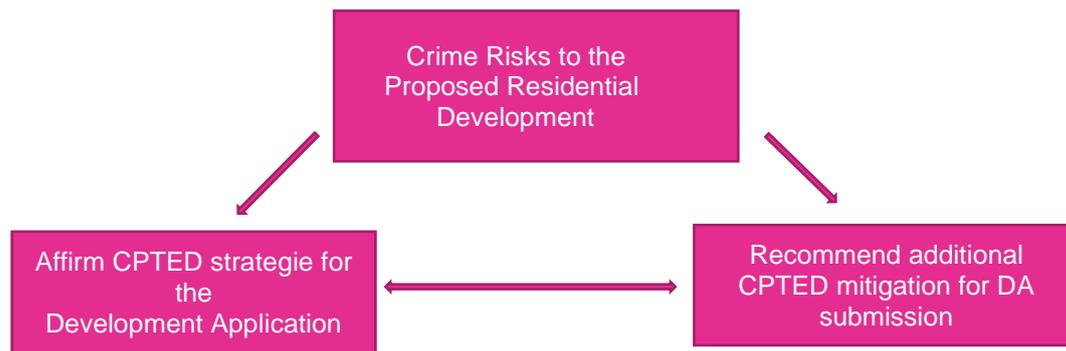
It is worth noting that even the most minor pre or post-occupancy offences occurring within or near the development, can have major consequences.

Assessment is based on four risk categories: 'low' (**L**), 'moderate' (**M**), 'high' (**H**) and 'extreme' (**E**). Risk categories, levels and consequences are framed by AS/ISO 31000:2018, *Risk Management Guidelines* (refer Matrix **Appendix 2**).

The mostly predictable crime categories likely to 'target' the development are:

- (i) damage to, or theft of, construction machinery, building equipment and vehicles (**M – H**)
- (ii) damage to, or theft of, utilities items and appliances being installed during construction (**M – H**)
- (iii) damage to partially or newly completed dwellings (**M**)
- (iv) damage to dwellings, carports and garages, or theft of residential property, post construction (**L - M**)
- (v) theft of, or damage to, owner-occupier motor vehicles, (**L- M**)
- (vi) post-construction damage to streetscapes, common infrastructure or street fittings (**L**)
- (vii) intimidating anti-social behaviour towards residents, their visitors or contractors, (**L**)
- (viii) physical and/or sexual assaults against (vii) above, including at night, (**L**)
- (ix) context-based drug dealing in the vicinity of, or within, the subdivision, (**L - M**).

Application of each CPTED principle, where relevant to this development, follows, **Section 7**.



## 7 CPTED Applications to Ensure 'Welcoming and Safe Place' Outcomes

The following five principles are the Harris adaptations from Moffatt (1983), referred to in Section 4.2.

### 7.1 CPTED Principle 1 Territorial Definition: clarity about spatial identity, separation, boundaries and purposes

#### Generic Explanation

*Defining territorial boundaries, spatial separation and purposes are the elements of this first CPTED principle. The aim is to maximise built form and public domain 'knowledge certainty' for all who have day-night access to a site.*

*Stakeholder, occupant, visitor, emergency response or contractor knowledge (identification) of territorial sub-spaces increases destination and circulation confidence.*

*When built form and open space is clearly defined, form and function are more easily identified. This removes confusion of purpose and enhances safe circulation.*

#### 7.1.1 Application – Contextual and Site Definitions

The presently issued subdivision masterplan layout is clearly defined. There is clarity around internal streets, their interconnectivity and their links to Anambah Road. Open (green) spaces are indicatively defined, most of which are designated as pocket parks. Road reserves, riparian corridors, water quality, detention and waste management zones are similarly noted on the masterplan.

#### 7.1.2 Application – Masterplan (Concept) Dwelling Layout - Definitions, Purposes and Spatial Separation

The sub-division's (masterplan) footprint combines single level and medium density proposals, indicatively drawn. Road reserves and road (street) layouts will provide appropriate (safe) wayfinding throughout all subdivision stages.

Occupation and circulation design elements indicate appropriate dwelling alignment, consistent with the Council's requirements for maintaining a safe and secure neighbourhood.

These elements should maximise safe wayfinding and subdivision 'knowledge certainty'. Definitional elements should therefore provide directional destination location confidence for residents and 'first time' visitors and maintenance contractors.

The masterplan layout indicates no spatial confusion. Design development-detail by relevant disciplines should ensure no 'hidden' spaces or blind corners likely to conceal or entrap within the development footprint.

External lighting, communal landscaping and signage are key elements to ensuring consistent and safe day-night site identification and (safe) intra-site movement-to-locations. (**Refer Principle 4**)

Definitional spaces between lot dwellings will comply with Council's planning approval and there should be no CPTED-related issues with these definitions.

### 7.1.3 Application – Waste Management

JBS&G have provided a comprehensive waste management plan. This forms part of defined water and riparian corridors. Detailed approvals will be forthcoming as each stage evolves. In CPTED terms, the definitions of water and waste management support the overall clarity of site wayfinding.

### 7.1.4 Application – Utilities Infrastructure and Other Plant

Protecting all external utilities infrastructure is critical. Securing electricity or other residentially located meters is essential to prevent unlawful tampering.

## 7.2 CPTED Principle 2 Natural Surveillance: architecture facilitating strong sightlines for informal (passive) observation

### Generic Explanation

*The principle of natural (aka informal or casual) surveillance encourages (i) the observation of built form and public domain spaces and purposes by user/stakeholders and (ii) the observation and notation within or around spaces of usual or unusual activity and behaviour, potentially (or actually) leading to anti-social or criminal threats and incidents.*

*Natural surveillance is purposeful observation. Maximum surveillance impact requires sightline certainty, facilitated by clear proximate-distant and longitudinal-latitude fields. The aim is to know who or what is within a surveillance field and to observe specific unlawful action or intent.*

### 7.2.1 Application – Subdivision Intra-Site Surveillance

Proposed residential lots, yards, setbacks and driveways, visual connection with adjoining residences, the parks, street frontages and 'informal' open spaces will offer opportunities for multi-axis ground plane surveillance.

These should make for legible, interconnecting sightlines around the site's boundaries (perimeters). This means a combination of proximate and distant 'surveillance certainty' as a result.

### 7.2.2 Application – Intra-Site Surveillance During Construction

Continual and predictable natural surveillance opportunities throughout construction will be problematic. Trade and other contractors will be focussed on work, deliveries and schedules. However, contractor orientation should include the need and opportunity to observe and report any behaviour that could be construed as potential security breaches and/or criminal activity. (**Refer Principle 5**)

### 7.2.3 Application – Resident (Occupancy) Surveillance

There is ample observation space throughout the site – incorporating the streetscape setback, internal driveway loop, entries to garages and to dwelling front doors. Intra-site sightlines are strong.

The between-buildings surveillance opportunities will be 'promoted' by simple driveway and pathway designs, encouraging safe circulation, again seeking to eliminate entrapment spaces or blind corners on approaches to, or away from, any dwellings or other structures throughout the subdivision.

Given the (masterplan) definitional certainty of the subdivision's ground plane (**Principle 1**), surveillance sightlines along, and at, intersecting circulation-activation axes are achievable. Definition + strong sightlines facilitate proactive day-night 'eyes and ears' observation of the usual and unusual.

**General Note on Ground Plane Surveillance:** In our experience, and from scholarly research, legible and permeable ground plane surveillance has the following advantages:

- (i) Sightlines are at eye level facilitating proximate and distant surveillance.
- (ii) The hearing range is closer meaning incidents are more likely to be sight-sound identified, even when there are contextual distractions.
- (iii) There is a sense of context – the observer and/or hearer is usually within or near the same space and is 'drawn' to any unusual or disturbing behaviour.
- (iv) Night-time on-street person and property surveillance is still effective due to retaining same-plane visual and aural (audible) cues.

### 7.3 CPTED Principle 3

### Access Control: who goes where, when and why

#### Generic Explanation

*Access control is a consequential extension of defining territory (Principle 1) and natural surveillance (Principle 2). Open and/or restricted access must be: (a) readily identified through the appropriate built form (approach) architecture, (b) supported by mechanical or electronic access control systems, both aimed at preventing unauthorised access.*

#### 7.3.1 Application – Pre-Occupancy (Construction) Access

Construction contractor, visitor, government or other allied professional access must be strictly controlled. No person or vehicle should be on site without identification and subsequent authorisation.

Video intercom (identification) technology for should be considered. (**Refer Principle 5**)

#### 7.3.2 Application – Access to Completed Dwellings

Design development-detail will ensure that front door and/or garage entry will be controlled by dwelling owner-occupiers who may also prevent potential unauthorised access through the application of video camera, mechanical and/or video-audio systems. Carports may be an area for camera 'capture'.

#### 7.3.3 Application – Mailbox Security

The location security of mailboxes is mentioned by police in their 'CPTED Check List' as there is increasing mail theft for 'stolen identity' purposes. This is particularly so with newly completed residential developments on occupancy. It is therefore important to 'alert' residents to this risk when appropriate.

While each household will probably select differing mailbox designs, we recommend that they be structurally strong, not easily removed and securely locked at all times to prevent tampering and mail theft. Resident mailbox access should be on the property side.

#### 7.3.4 Application – Post-Construction Contractor Access

From time to time, contractors will need to enter dwellings. As with all who seek such access, we are assuming that residents (households) will (and must) challenge and verify identity.

## 7.4 CPTED Principle 4

### Activity Support: influences of (mainly external) lighting, landscaping and signage

#### Generic Explanation

*Activity support applies (external) lighting, landscaping and signage architecture to a footprint's form and function design, 'supporting' definitional clarity, passive and technical surveillance and access control (Principles 1 to 3).*

#### 7.4.1 Application – External Lighting Consistency, Colour and 'Corridors'

External lighting is a critical 'support' for the development's night-time 'welcoming-and-safe-place' objectives; an integral part of ensuring residents, visitors, and, where required, contractors or emergency services personnel are 'secure' in wayfinding.

The idea is to create consistent lighting 'corridors' across all subdivision stages, maximising wayfinding certainty and safety. Illumination consistency should eliminate shadows or gaps, ensuring strong beam angles, throw spill and wash.

Power Solutions has advised their intention to develop a lighting plan. They might also be involved in a plan for construction security lighting.

From a CPTED perspective it is essential to present consistent lighting colour characteristics for all streets (roadways), publicly accessible open spaces including the proposed parks. LED lighting is assumed, and we recommend 4000 Kelvin, as the most appropriate colour temperature to achieve safe proximate and distant wayfinding, surveillance and, where necessary, identification.

(The white-natural light spectrum at 4000 Kelvin has advantages over blue, orange or yellow colour output. Yellow, orange and blue renditions distort natural colour profiles and features. White light installations strengthen contrasting colours and identify individual (personal) features more distinctly. Complementary street lighting should match this temperature.)



Images 5 and 6 wayfinding light examples as alternatives to standard pole luminaires, aiming to 'spill' light across streetscapes and on to driveways - Harris

We do not recommend any bollard lighting. Bollards create glare and tend to interrupt sightline or wayfinding certainty and can become obscured in vegetation. Bollards are also prone to intentional or accidental damage.

#### 7.4.2 Application – Landscaping

Landscaping will be largely the prerogative of each household – that is plantings they choose for the front, side and possibly rear dwellings, including for example alfresco spaces. The object of residential

landscaping is to prevent opportunity for concealment or entrapment around dwellings. Maintaining plantings to prevent these possibilities has crime prevention 'merit'.

BGS&G have provided a landscape masterplan for streetscapes, open spaces including parks and some boundary areas. Development will be ongoing.

### 7.4.3 Application – Dwelling Numbering Signage

Numbering signage is standard and an obvious necessity in this, and all, residential developments, adding to the site's safety and security value. Directional signage is the key to wayfinding and access-controlling 'knowledge'.

Signs should reflect a clarity of style aimed at providing wayfinding confidence, destination (arrival) certainty and access-limiting advice.

Clear numbered signage and/or driveway wayfinding immediately directs first time visitors, contractors and emergency services.

## 7.5 CPTED Principle 5

### Target Hardening: adding specific and robust architecture and technology

#### Generic Explanation

*Target hardening is often called 'situational' crime prevention. It aims to reinforce other CPTED principles and to proactively 'strengthen' form, infrastructure, structures, fixtures, fittings and furniture in and around identified vulnerable spaces. Target hardening is an added crime risk defence layer.*

#### 7.5.1 Application – Site Security Throughout Construction

We have expressed concern at the whole-of-subdivision vulnerability during all construction activity, particularly in view of its isolation. Robust perimeter fencing and lockable gates must be mandatory, not just to comply with regulations, but to strengthen security by deterring/preventing unauthorised access.

There should be video surveillance installations (IP Network or CCTV) at key perimeter, plant, equipment, delivery and overnight (general) vehicle parking zones. Appropriate perimeter and vulnerable zone lighting should be installed. Patrolling security contractors should be hired, particularly as passive surveillance is not possible at night or when the site is vacant, for example on weekends.

#### 7.5.2 Application – On-Site Temporary Structures During Construction

There should be an extra 'layer' of security around (at) lockable site offices and first aid rooms, including flood lighting. They should always be readily observable and kept free of 'clutter'.

#### 7.5.3 Application – Dwelling Fixtures, Fittings, Barriers and Mailboxes

As a residential development, there is no call for 'target' hardening measures, except for ensuring that that fencing and proposed perimeter and adjoining open space 'barriers' are defined, to prevent unauthorised site access and to resist property or other structural damage.

It is recommended security-rated screen doors be installed for each dwelling as a design detail. Windows should also be key-lockable when closed or when partially open (preventing access).

We mention again (7.3.3) our earlier recommendation regarding the robust structure and design of mailboxes to prevent damage or mail theft.

### 7.5.4 Application – CCTV for Household Surveillance and Identification Validation

Each household will decide whether to install their own video monitoring system, at front or rear entrances. There could be some advantage in providing 'common' advice as to the type, effectiveness and costs associated with such installations. The aim is to 'protect' property and validate persons seeking dwelling access.

## 8 Informing Legislation, Policy and/or Planning Instruments: Compliance

### 8.1 Environmental Planning and Assessment Act, 1979 (as amended)

Consideration of crime prevention for mid to large scale developments in New South Wales derives from Section 4.15 (1) (b) and (e) of the NSW Environment Planning and Assessment (EPA) Act, (as amended).

The Act allows provision for State and local government instruments to regulate or codify issues pertaining to the evaluation of environmental impacts of developments. Social "impacts" (b) and "the public interest" (e) fall within this Section. Under the heading 'Evaluation', Section 4.15 (1) states:

*"In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application:*

- (b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,*
- (c) the suitability of the site for the development,*
- (d) any submissions made in accordance with this Act or the regulations,*
- (e) the public interest."*

In the case of 'green' or 'brown' field developments, interpretation of "the public interest" includes stakeholder proponents, post-development occupants and, by extension, the wider community.

Local Government authorities in NSW are required to consider the various impacts within S.4.15 when evaluating developments. Councils recognise the importance of mitigating anti-social and criminal behaviour within their constituencies. Many have incorporated the CPTED framework into Development Control Plans and/or Crime Prevention Plans, requiring crime prevention considerations as a specific development consent condition.

The *public interest* interpretation aims to ensure CPTED-relevant architecture creates and promotes 'safe place' outcomes, i.e. to prevent anti-social and/or criminal behaviour which could put at risk people and property associated with a new development footprint.

Ordinarily, the *public interest* is limited to a development footprint. However, public space approaches to, or 'edges' of, a development's surrounds, may be considered as an extension of the social and public interest impacts S.4.15 (b) and (e).

In our opinion, the proposed development has considered the "social" and "public interest" requirements of this Section and the 2001 regulatory CPTED Guidelines.

### 8.2 Maitland City Council – Development Control Plan 2011

Part C of the 2011 DCP contains specific guidelines for built development. Part C Section 12 'guides' applicants as to how and why CPTED solutions should be applied to relevant aspects of complying developments.

Subdivisions involving newly development areas, parks and open spaces or publicly accessible areas fall within Council's requirement for a... "detailed Crime Prevention Through Environmental Design assessment." (C.12 p 244),

Although a protracted staged development, we have confidence that the developer(s) intend to comply with the C.12 requirements as the stages progress.

### 8.3 NSW Police CPTED Check List

The NSW Police have developed their own CPTED (or Safer-By-Design) guidelines as a 'Check List' which was revised in 2020. Relevant items in the Check List have been reviewed. This report has been undertaken with reference to those relevant items, particularly with reference to residential mailbox theft, for the purposes of stealing personal identity details.

### 8.4 International Standards Informing CPTED Principles and Applications

There are no (crime) risk and mitigation absolutes or guarantees when referencing or applying Standards. However, there are two International Standards relevant to the application of CPTED. AS/ISO 31000:2018, *Risk Management Guidelines*, provides a helpful framework to identify and manage any organisational risks, include crime risks.

A more recently, and relevant, gazetted Standard is ISO 22341:2021 *Security and Resilience – Protective Security – Guidelines for Crime Prevention Through Environmental Design*. It provides a CPTED framework.

### 8.5 Instrument Compliance Conclusions and/or Recommendations

Harris Crime Prevention Services' consultants conclude that reviewed and assessed masterplan layout drawings for the proposed residential subdivision development at 559 Anambah Road Gosforth NSW, will consider necessary strategies for mitigating anti-social and criminal behaviour risks by applying CPTED principles as required by:

- (i) legislation and/or regulations and crime prevention Guidelines (2001) derived from Section 4.15 of the NSW Environment Planning and Assessment Act, 1979, as amended,
- (ii) Maitland City Council's Development Control Plan, 2011, Section C.12,
- (iii) the NSW Police Crime Prevention (Safer-By-Design) Checklist – Revision 2020.

We conclude that, subject to intentional application of CPTED measures throughout masterplan concept revisions and during design development-detail documentation, the subdivision will comply with the relevant State and local instruments (above).

## 9 OVERALL CPTED ASSESSMENT SUMMARY

### Application of CPTED Principles

In our professional opinion, the reviewed concept masterplan drawings and associated documentation for the proposed residential subdivision at 559 Anambah Road Gosforth NSW, is intentionally considering CPTED principles and their application to masterplan revisions. We are confident that relevant CPTED elements will continue to be incorporated as the development progresses from masterplan to (staged) design development-detail.

#### *Principle 1: Territory Definitions, Purpose and Spatial Separation*

The masterplan clearly defines street and dwelling layouts, the proposed open space and pocket park locations, entry-exit points and waste management concepts. In summary, the development's footprint ensures whole-of-site clarity of purposes through well-defined spatial separation and overall legibility. CPTED 'looks for' this design element clarity.

#### *Principle 2: Natural Surveillance*

The proposed evolution of the subdivision's design will facilitate pre-occupancy (construction) surveillance and post-occupancy owner-occupier surveillance

#### *Principle 3: Access Control*

Throughout construction, the developer has recognised the need to provide authorised access to all associated with the various design-and-construct disciplines accessing the site.

#### *Principle 4: Activity Support – external lighting, landscaping and signage*

Intra-site street, pathway, open space and pocket park lighting will be designed in accordance with Standard 1158 and Ausgrid's Standard NS119. Landscaping elements will incorporate plantings aimed at minimising opportunities for concealment or entrapment. Signage will accord with Maitland City Council's requirements

#### *Principle 5 Target hardening*

During all phases of construction, particularly the earlier stages of the development and before available resident passive surveillance, it is highly recommended that an IP Network (CCTV) video system is installed to monitor all access and pedestrian-vehicle movement. Contractor ID should be mandatory for all disciplines.

A whole-of-site robust security fence and gates must deter and/or prevent unauthorised access. Construction lighting should illuminate key site zones as plant, equipment, site offices, dwelling deliveries and vehicles are vulnerable to criminal targeting, especially given the site's isolation.

An overnight security contractor is also recommended for early stages of the development or parts of the site where passive surveillance is not possible.

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We have noted (8.5 above) that the development's design team incorporation of CPTED principles will comply with the State Government's 'social impact' and 'public interest' requirements. It also complies with Maitland City Council's Development Control Plan requirements.

We therefore support (progressive) consent by Maitland City Council, as that consent relates to considering or fulfilling CPTED conditions throughout the subdivision's staged development.

## 10 References

Ausgrid

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Groundswell Engineers, Anambah Residential Community Concept Masterplan – Road Layout, Revision E 8<sup>th</sup> May 2025,

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Maitland City Council, Development Control Plan 2011, Section C.12,

Maitland City Council, Pre-Lodgement Meeting Minutes – Proposed Residential Subdivision, 559 Anambah Road, Gosforth NSW, 11<sup>th</sup> July 2024,

Maitland City Council, Community Safety Plan, 2024,

Moffatt, R, Crime Prevention Through Environmental Design – A Management Perspective, Canadian Journal of Criminology, Vol 25, 1983,

NSW Bureau of Crime Statistics and Research, Crime Statistics for the suburb of Gosforth, NSW, January 2020 – December 2024,

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NSW Police, Crime Prevention Through Environmental Design (Safer-By-Design) 'Check List', Revision 2020,

Power Solutions (NSW) Pty. Ltd, Public Street Lighting Plan, 27<sup>th</sup> August 2024,

Standard AS/ISO 31000:2018, Risk Management Guidelines,

Standard ISO 22341:2021 Security and Resilience – Protective Security – Guidelines for Crime Prevention Through Environmental Design.

## 11 Supporting Appendices 1 and 2

### APPENDIX 1 CRIME DATA FOR GOSFORTH LOCALITY NSW

The following crime data is supplied by the NSW Bureau of Crime Statistics and Research. As anticipated, there has been no reported crime in the Gosforth locality over the five-year period January 2020 to December 2024.

NSW Crime Statistics January 2020 to December 2024 - Gosforth (Suburb)											
	5 Year Trend to December 2024	Year to Dec 2020 Count	Year to Dec 2020 Rate	Year to Dec 2021 Count	Year to Dec 2021 Rate	Year to Dec 2022 Count	Year to Dec 2022 Rate	Year to Dec 2023 Count	Year to Dec 2023 Rate	Year to Dec 2024 Count	Year to Dec 2024 Rate
Homicide	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Assault - domestic	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Assault - non Domestic	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Sexual assault	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Sexual touching, sexual act & other sexual offences	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Robbery without weapon	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Robbery with a firearm	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Robbery with weapon not a firearm	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Intimidation, stalking & harassment	n.c.	0	n.c.	0	n.c.	0	n.c.	1	n.c.	0	n.c.
Other offences against the person	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Break & enter dwelling	n.c.	0	n.c.	1	n.c.	0	n.c.	0	n.c.	0	n.c.
Break & enter non dwelling	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Motor vehicle theft	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	1	n.c.
Steal from motor vehicle	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Steal from retail store	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Steal from dwelling	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Steal from person	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Liquor offences	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Disorderly conduct	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	1	n.c.
Disorderly Conduct (criminal intent)	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Disorderly conduct (trespass)	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	1	n.c.
Disorderly conduct (offensive conduct)	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Drug offences	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.	0	n.c.
Malicious damage to property	n.c.	0	n.c.	1	n.c.	1	n.c.	0	n.c.	1	n.c.
Prohibited and regulated weapons offences	n.c.	0	n.c.	0	n.c.	0	n.c.	1	n.c.	0	n.c.
Arson	n.c.	0	n.c.	0	n.c.	1	n.c.	0	n.c.	0	n.c.

## APPENDIX 2 THE RISK MANAGEMENT STANDARD

While there are absolutes or guarantees around risk and risk mitigation, the International Standard – AS/ISO 31000:2018 provides a helpful framework to identify and manage *any* organisational risks, including crime risks.

Identifying and mitigating crime risks is a legitimate application of the Standard. The Standard provides a theoretical and practical framework whereby contexts, risks, levels and consequences can be identified and managed.

The Standard defines generic risk as... “*the effect (impact) of uncertainty on objectives*” (AS/ISO 31000 Clause 2.1). The Standard’s objective is to identify and remove or manage the uncertainty so as not to negatively impact on organisational objectives.

Harris has adapted and applied the Standard by defining (crime) risks within the **context**, assessing **risk levels** and affirming and/or recommending appropriate CPTED treatment.

The collective term ‘**risk**’ has been more widely defined as: ...*‘the likelihood of something untoward happening and the consequence(s) if one or more risks become threats or incidents.’*

Threats and incidents are progressive in their definitions. If risks remain unidentified and untreated (unmanaged), they can rapidly and easily become threats or incidents.

A ‘**threat**’ may be defined as *‘unacceptable and escalating behaviour stemming from one or more ‘uncontrolled’ risks, which if not urgently managed, is likely to lead to harm or damage with negative consequences or outcomes.’*

An ‘**incident**’ may be defined as *‘an uncontained threat with likely negative harm or damage consequences.’*

### 2.1 A (Crime) Risk Management Matrix

CPTED solutions should ‘match’ the adapted Standard’s risk levels and categorised behaviours. Recommendations and/or affirmation of architectural solutions are proposed against this backdrop. This table identifies typical risk levels applicable to this specific development.

<i>Low Level Risks</i>	disturbances, intimidation, and aggressive behaviour towards individuals or groups; graffiti and other minor property damage to the façades or street fixtures, fittings, paving, luminaires, plantings and signage
<i>Moderate Level Risks</i>	escalating intimidating or threatening behaviour leading to assault, and/or damage to personal property; unauthorised access, damage to and/or theft of property from the building, vehicles and/or vehicle theft
<i>High Level Risks</i>	‘moderate level’ crime risks escalated to intentional (planned) personal harm and /or damage to building facades and structures and/or property including plant and associated utilities infrastructure
<i>Extreme Level Risks</i>	immediate and dangerous threats to people and/or property, including the building and contents, vehicles, and/or nearby structures and/or utilities infrastructure, including bomb threats and hostile vehicle penetration

It is worth reiterating that even low risk levels can have serious consequences if not addressed.