James Marshall & Co

CPTED

Manufactured Home Estate: 120 Carrs Drive Yamba NSW.

September 2022

1. Introduction

James Marshall & Co has been engaged to prepare a CPTED assessment of a proposed Manufactured Home Estate (MHE) at 120 Carrs Drive Yamba, NSW. It is proposed that there be 216 dwellings on site. Servicing residents is the provision of communal facilities comprising club house and outdoor areas. The club house facility includes:

- Activity
- Gym
- Office
- Large dining/multi-functional space
- Commercial kitchen
- Lounge/informal space
- Games room
- Theatre
- Craft room
- Change Rooms and toilet facilities.

Health and recreational facilities, comprising;

- Bowls green
- Croquet lawn
- Outdoor pool

A site manager will be the contact for trades, maintenance, general enquires and residents matters. The layout of the development site is highlighted in Figure 1 and communal facilities layout is shown in Figure 2.

Figure 1: Layout Plan

Figure 2: Communal Facilities Layout

The CPTED report has been to ensure potential crime risk factors are taken into account to promote safety at the site; including those who live in the vicinity, who work at the site and those who utilise the services and facilities offered. In consideration of this report, reference is made to the Clarence Valley Crime Prevention Strategy 2011 – 2017 (later version not found), the Clarence Valley Council DCP (2011 p31), which states "…Planting should be in keeping with the principles of the NSW Police *Safer by Design: Crime Prevention Through Environmental Design Guidelines*".

Consideration is also given to the Clarence Valley Local Strategic Planning Statement (July 2020) where crime Prevention through environmental design, as a means of improving public safety and reducing crime in the development review process is a key directive. The same document identifies that the update of the crime prevention strategy is also a priority for the provision of healthy, safe and well connected communities.

2. Safer By Design

2.1 Overview
This CPTED assessment has incorporated the following methodology:

- Site visit and land use assessment of the proposed development site and surrounding area.
- Assessment of architectural drawings for the proposed development using Safer by Design principles.
- Assessment of crime statistics/data for both the Clarence Valley LGA and area surrounding the development site.
- An assessment of whether this development is likely to contribute to an increased incidence of crime (or perceived) if it is approved.

The recommendations made in this report are consistent with Safer by Design principles.

In April 2001, the then NSW Department of Infrastructure, Planning and Natural Resources (Department of Planning and Environment) introduced Crime Prevention Legislative Guidelines to Section 79C (now Section 4,15) of the Environmental Planning and Assessment Act, 1979. These guidelines require consent authorities to ensure that development provides safety and security to users and the community. If a development is thought to present a crime risk, the guidelines can be used to justify modification of the development on the grounds that crime risk cannot be appropriately minimised.

Councils and local police are encouraged to identify the types of development that will 'typically' require a crime risk assessment and prepare a consultation protocol. Protocols are location (need) based agreements which outline the types of development that will be jointly assessed, how construction will occur and timeframes for consultation. Subject to council direction, development types not listed in local consultation protocols will not require a formal crime risk (CPTED) assessment.

CPTED is a crime prevention strategy that focuses on the planning, design and structure of cities, communities and neighbourhoods. It reduces opportunities for crime by using design and place management principles that reduce the likelihood of essential crime ingredients (law, offender, victim or target, opportunity) from intersecting in time and space.

This is because predatory offenders often make cost benefit assessment 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:

- Maximise 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, minimising or concealing crime attractors and rewards); and
- Minimise excuse making opportunities (removing conditions that encourage / facilitate rationalisation of inappropriate behaviour).

2.2 CPTED Principles
CPTED employs four key strategies which are outlined below:

2.2.1 Territorial re-enforcement
Community ownership of public space sends 'signals' to the community. Places that feel owned and cared for are likely to be used, enjoyed and revisited. People who have guardianship or ownership of areas are more likely to provide effective supervision and are more likely to intervene if crime is taking place, or if there is a risk of crime occurring. Furthermore, criminals rarely commit crime in areas where the risk of detection is high.

Territorial re-enforcement uses actual and symbolic boundary markers, spatial legibility and environmental cues to 'connect' people with space, to encourage communal responsibility for public areas and facilities, and to communicate to people where they should not be and what activities are appropriate.

2.2.2 Surveillance

People feel safe in public areas when they can see and interact with others, particularly people connected with that space, such as shopkeepers or adjoining residents. Criminals are often deterred from committing crime in places that are well supervised.

Natural surveillance is achieved when normal space users can see and be seen by others. This highlights the importance of building layout, orientation and location; the strategic use of design; landscaping and lighting – it is a by-product of well planned, well designed and well used space.

Technical / mechanical surveillance is achieved through mechanical / electronic measures such as CCTV, help points and mirrored building panels. It is commonly used as a 'patch' to supervise isolated, high risk locations.

Formal (or Organised) surveillance is achieved through the tactical positioning of guardians. An example would be the use of the on-site supervisors, e.g. security guards at higher risk locations.

2.2.3 Access control

Access control treatments restrict, channel and encourage people and vehicles into, out of and around the development. Way-finding, desire-lines and formal/informal routes are important crime prevention considerations as they minimise opportunities for people to wander in areas where they are not supposed to. Effective access control can be achieved by using physical and symbolic barriers that channel and group pedestrians into areas, therefore increasing the time and effort required for criminals to commit crime.

Natural access control includes the tactical use of landforms and waterways features, design measures including building configuration, formal and informal pathways, landscaping, fencing and gardens.

Technical / Mechanical access control includes the employment of security hardware.

Formal (or Organised) access control includes on-site guardians such as employed security officers.

2.2.4 Space / Activity Management

Space / Activity Management strategies are an important way to develop and maintain natural community control. Space management involves the formal supervision, control and care of the development. All space, even well planned and well-designed areas need to be effectively used and maintained to maximise community safety. Conversely, places that are infrequently used are commonly abused. There is also a high correlation between urban decay, fear of crime and avoidance behaviour. The recommendations below relate to the general surrounds and also the internal layout to the development.

The proposed development has been assessed against these four principles. Furthermore, personal safety has been considered given the nature of the development.

2.3 Authors Qualifications

The CPTED Report has been undertaken by James Marshall. James has over twenty years' experience in the community development and social planning sector and during this time held a number of senior management roles in both the welfare sector and in local government. With reference to specific experience relating to the undertaking of crime risk assessments and Crime Prevention Through Environmental Design (CPTED). Key examples include;

- McCabe Park, Wollongong (crime risk assessment and subsequent redesign).
- Wollongong City mall (crime risk assessment and redesign as well as policy development).
- Wollongong Youth Centre (crime risk assessment and subsequent redesign).

- Peace Park (Chinaman's Hollow) Cessnock (crime risk assessment in its development phase).
- Cessnock Civic precinct and main street upgrade (crime risk assessment in its development phase).
- Rotary Park, Kurri Kurri (crime risk assessment and redesign).
- ALDI Stores (Kurri Kurri, Taree, Muswellbrook and Mayfield).
- McDonalds Restaurants (Cessnock, Kurri Kurri, Dubbo, Tuncurry).
- Lake Macquarie Yacht Club
- Various aged care residential developments (Morisset, Whitebridge, Cessnock)
- KFC (Hunter Street Newcastle)
- New residential release areas (Dubbo City Council – Keswick Estate)
- Strategic site investigation and risk assessment (McDonald's, ALDI, private developers).
- Various open space assessments (Wollongong City Council, Cessnock City Council, Orange City Council; NSWLPMA).
- Coles Stores (various).
- One Stop Wine Barn (Cessnock).

These projects have involved the facilitation of a consultative approach with Council officers, NSW Police, business owners, users of the areas under review (target group focused), business chamber representatives etc. James understands the principles behind the crime risk assessment process, including the use of and application of crime statistics as well as the influencing factors of public safety and risk via urban design and use of public space.

3. Area Analysis and Crime Characteristics

3.1 Clarence Valley

The Clarence Valley Council website states that the Clarence Valley is a place of outstanding natural beauty and diversity, from lush rainforests to unspoilt beaches and fertile river plains.

The Clarence River, more than 380kms in length is the Valley's living link connecting the rural localities and rugged mountain ranges in the west to the City of Grafton, onward to the hinterland villages, historic river towns of Ulmarra and Maclean and the coastal centers of Yamba and Iluka.

- Major growth industries include tourism being driven by substantial investment, strong market awareness and improved transport links. Additionally new business development and investment is occurring around lifestyle products such as tea tree oil, regional cuisine and integrated food delivery as well as developing aquaculture and ship building industries.
- Major industry sectors include commercial estuary and ocean fisheries, with significant plant and port facilities in Yamba, Maclean and Iluka. Traditional industries like beef and sugar cane production and milling remains strong.
  The area is experiencing significant growth in housing and commercial construction and tourism has emerged as a key industry with very significant growth occurring in Yamba name Australia's No1 town and Iluka.
- Major Employers include the service industries, retail trade, tourism, plus property and business services, health and community services, education, agriculture, forestry and fishing.

3.2 Crime Characteristics

Clarence Valley Council has developed a crime prevention strategy (2012 – 2017). It is understood that the document is to be updated however understanding crime trends and priority areas for the LGA are important. Historical crime data for the LGA is shown in the following tables.

Table 1: Assault: Domestic Violence

	2007		2008		2009		2010		2011	
	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank
Clarence Valley	157	87	167	86	128	104	159	85	169	82
Coffs Harbour	271	70	314	53	321	48	333	46	133	50
Greater Taree	308	21	265	34	259	34	234	41	233	46
Kempsey	209	13	286	4	214	13	208	13	185	22
Nambucca	107	28	92	47	117	21	100	31	86	51
Port Macquarie - Hastings	223	88	61	61	402.5	57	433.7	51	276	70

Source: Clarence Valley Council Crime Prevention Strategy 2012 – 2017: P16

Table 2: Assault: Non-Domestic Violence

	2007		2008		2009		2010		2011	
	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank
Clarence Valley	342	60	267	80	317	58	219	87	278	57
Coffs Harbour	461	56	481	50	432	60	459	51	441	45
Greater Taree	350	42	371	39	321	48	292	57	301	43
Kempsey	255	22	240	30	254	20	235	28	196	35
Nambucca	157	30	189	16	146	32	165	21	111	51
Port Macquarie - Hastings	349	86	457	63	492	49	501	46	468	44

Source: Clarence Valley Council Crime Prevention Strategy 2012 – 2017: P16

Table 3: Break and Enter Dwellings

	2007		2008		2009		2010		2011	
	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank
Clarence Valley	381	46	320	53	348	38	275	63	297	52
Coffs Harbour	381	75	371	72	341	74	409	56	354	66
Greater Taree	407	30	560	13	574	12	666	8	343	32
Kempsey	249	28	212	40	389	7	387	9	473	5
Nambucca	123	59	112	58	147	30	107	58	100	61
Port Macquarie - Hastings	383	79	235	117	296	91	466	47	315	82

Source: Clarence Valley Council Crime Prevention Strategy 2012 – 2017: P17

Table 4: Break and Enter Non-Dwellings

	2007		2008		2009		2010		2011	
	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank
Clarence Valley	352	22	305	28	215	56	180	51	276	19
Coffs Harbour	484	21	443	23	325	45	281	39	299	41
Greater Taree	255	37	269	33	255	32	267	16	232	25
Kempsey	244	10	183	22	193	16	115	38	197	12
Nambucca	171	7	129	17	106	27	97	22	124	15
Port Macquarie - Hastings	225	82	190	92	269	68	224	66	259	57

Source: Clarence Valley Council Crime Prevention Strategy 2012 – 2017: P17

Table 5: Malicious Damage to Property (2007 – 2011)

	2007		2008		2009		2010		2011	
	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank
Clarence Valley	940	47	869	62	762	69	632	72	706	63
Coffs Harbour	1316	44	1089	69	1202	50	1125	49	1051	52
Greater Taree	876	48	870	55	854	47	723	53	787	37
Kempsey	588	39	685	27	560	32	612	22	599	21
Nambucca	405	31	387	35	306	57	266	54	247	70
Port Macquarie - Hastings	966	82	1067	77	1180	60	1001	64	893	79

Source: Clarence Valley Council Crime Prevention Strategy 2012 – 2017: P18

Table 6: Breach Apprehended Violence Order

	2007		2008		2009		2010		2011	
	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank	No. of incidents	Rank
Clarence Valley	67	90	84	77	99	69	86	76	108	61
Coffs Harbour	141	62	131	66	171	51	128	72	144	66
Greater Taree	187	13	172	13	142	33	119	45	148	26
Kempsey	122	8	120	8	122	12	91	27	63	58
Nambucca	76	11	51	41	92	6	65	20	45	53
Port Macquarie - Hastings	146	63	160	55	175	56	189	41	144	70

Source: Clarence Valley Council Crime Prevention Strategy 2012 – 2017: P18

Crime by premises is also important elements to understand what types of areas are susceptible to crime and anti-social behaviour (refer Table 7). Table 8 lists the current crime ranking for various incidence of crime for 2021.

Table 7: Clarence Valley – Crime by Premises (2021)

Premises type	Domestic violence related assault	Non-domestic violence related assault	Sexual offences	Robbery	Break and enter non-dwelling	Motor vehicle theft	Steal from motor vehicle	Steal from person	Malicious damage to property
Adult entertainment	0	0	0	0	0	0	0	0	0
Financial institution	0	2	0	0	0	0	0	0	0
Office	0	2	0	0	3	0	0	0	7
Personal services	0	3	2	0	3	0	0	0	9
Retail/wholesale	3	8	2	1	21	2	11	6	27
Carpark	3	7	2	0	0	2	19	0	12
Education	0	24	4	0	15	0	0	0	15
Health	0	6	1	0	0	0	1	0	4
Industrial	0	3	1	0	7	2	1	0	2
Law enforcement	0	2	0	0	0	0	1	0	2
Licensed premises	1	7	1	0	2	1	1	1	9
Marine transport	0	1	0	0	1	0	0	0	0
Outdoor/public place	15	61	6	3	2	18	43	5	60
Recreation	0	1	0	0	5	2	2	0	6
Religious	0	0	0	0	0	1	0	0	1
Residential	178	95	74	1	8	52	109	2	252
Rural industry	1	1	0	0	5	2	0	0	5
Public transport	0	2	1	0	0	0	1	0	1
Utilities	0	0	0	0	0	0	1	0	1
Vehicle	0	0	0	0	0	0	1	0	0
Firearm premises	0	0	0	0	0	0	0	0	0
Unknown	0	0	10	0	0	0	0	0	0
Total	201	225	104	5	72	82	191	14	413

Table 8: Ranking of Reported Crime for Clarence Valley LGA against each NSW LGA (2021)

Reported Crime	Ranking out of 139 NSW Local Government Areas (with a population greater than 3,000 people)
Assault – Non DV Related	45
Assault – DV Related	61
Robbery	70
B/E Dwelling	38
B/E Non-Dwelling	46
MV Theft	45
Steal from MV	39
Steal from Retail Store	62
Steal from Dwelling	18
Steal from Person	N/A
Malicious Damage to Property	50

Source: BOCSAR September 2022

The use of 'hot spot' maps shows where crime is concentrated (the higher concentration / number of the incidence of crime appear a darker shade of red). The purpose of this is to identify the areas / locations where crime is more likely to occur, as well as the incidence and type of crime so resources and strategies can be put into place to address specific issues. The hot spot maps for the proposed development site are shown below.
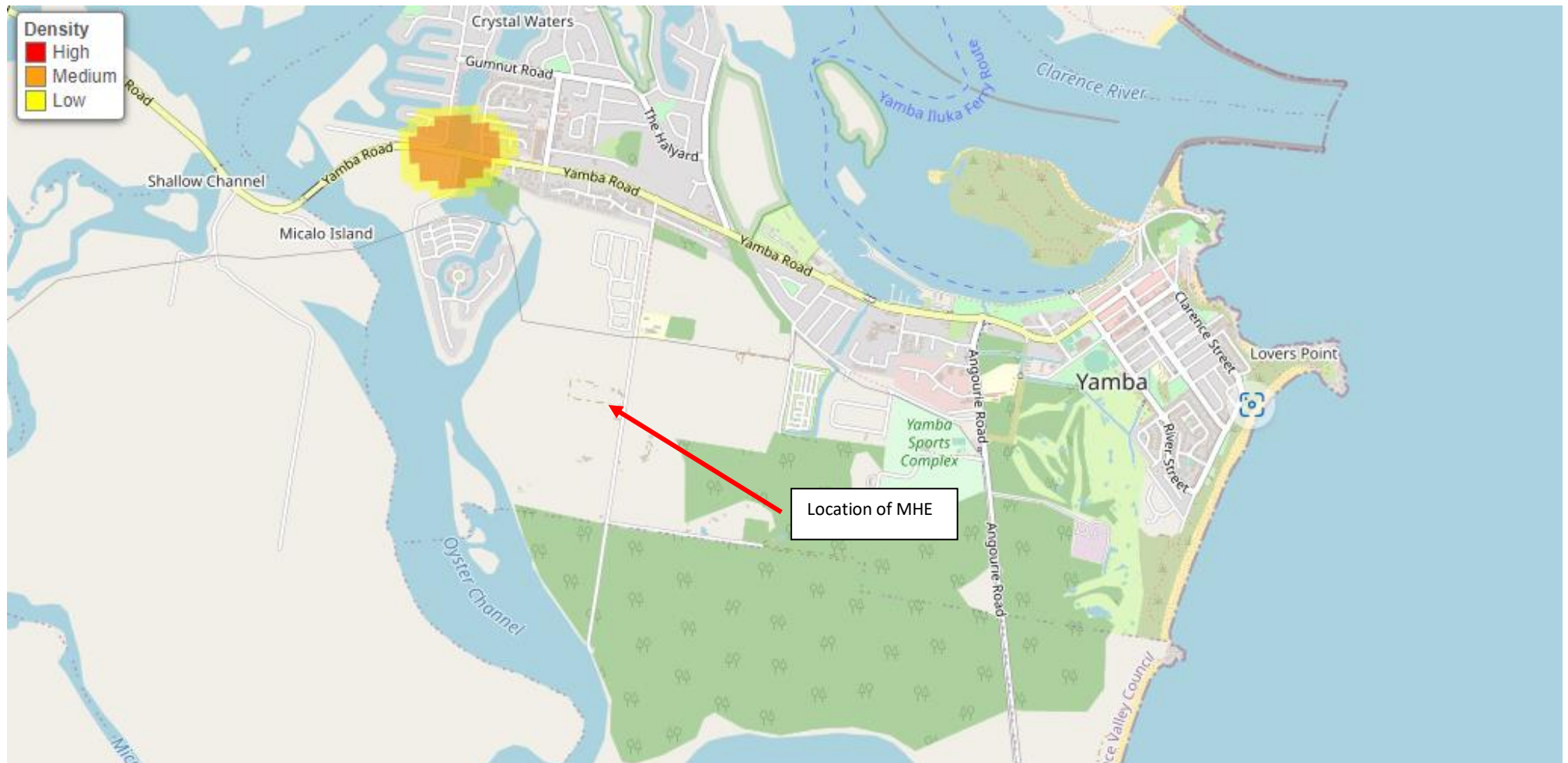
Figure 3: Incidents of Assault (Domestic assault) from July 2021 to June 2022
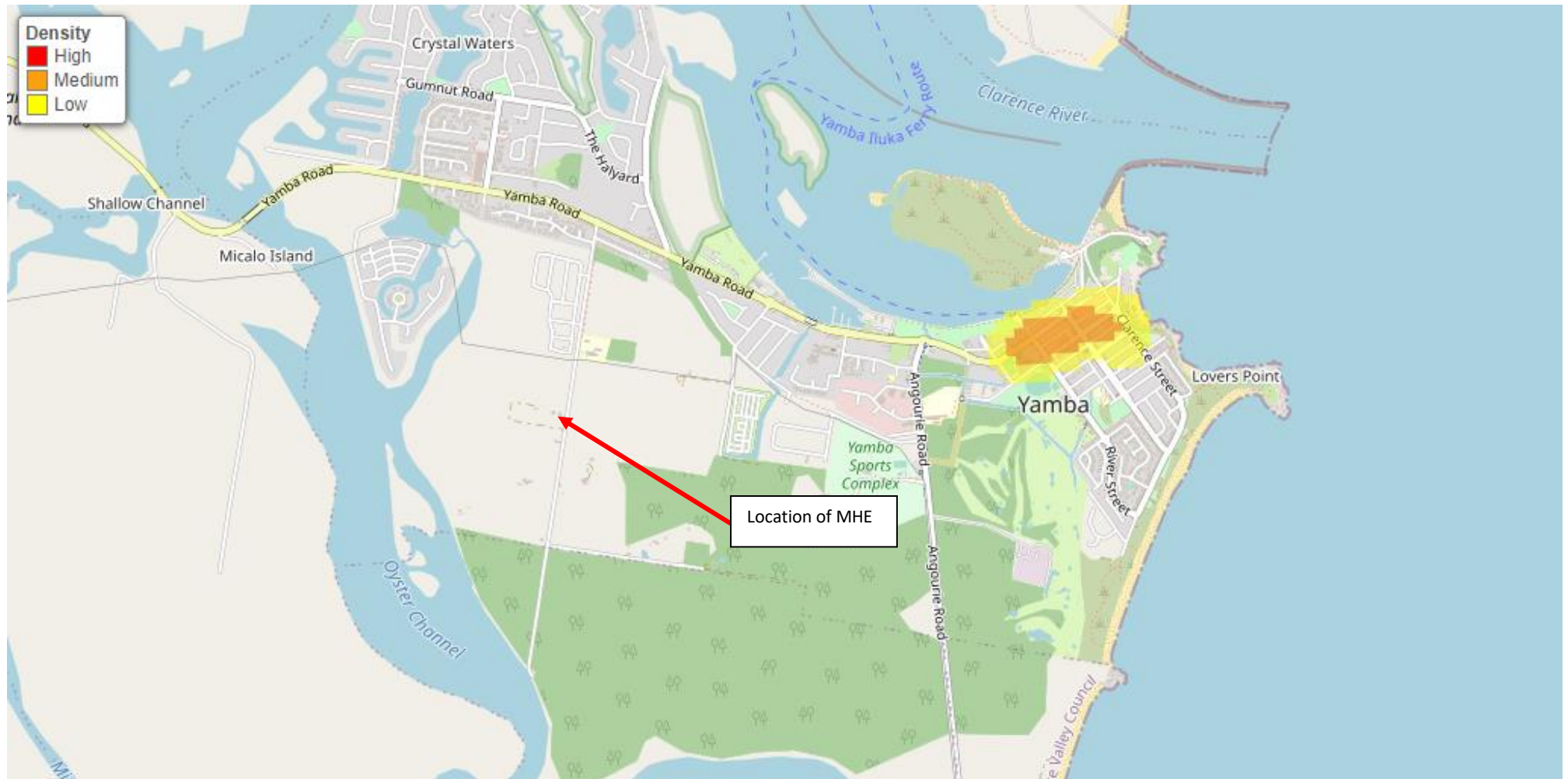
Figure 4: Incidents of Assault (Non-domestic assault) from July 2021 to June 2022
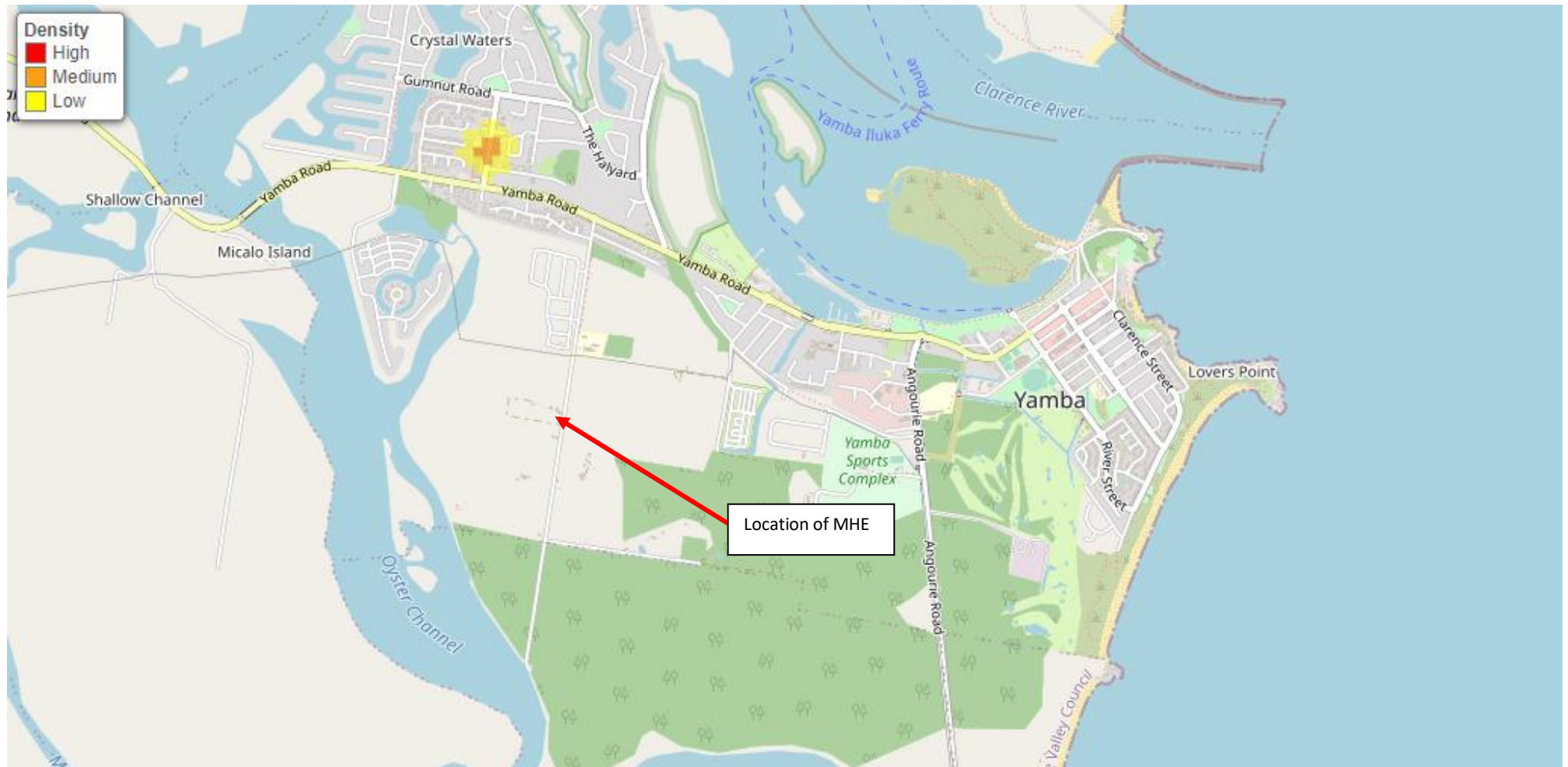
Figure 5: Incidents of Robbery from July 2021 to June 2022
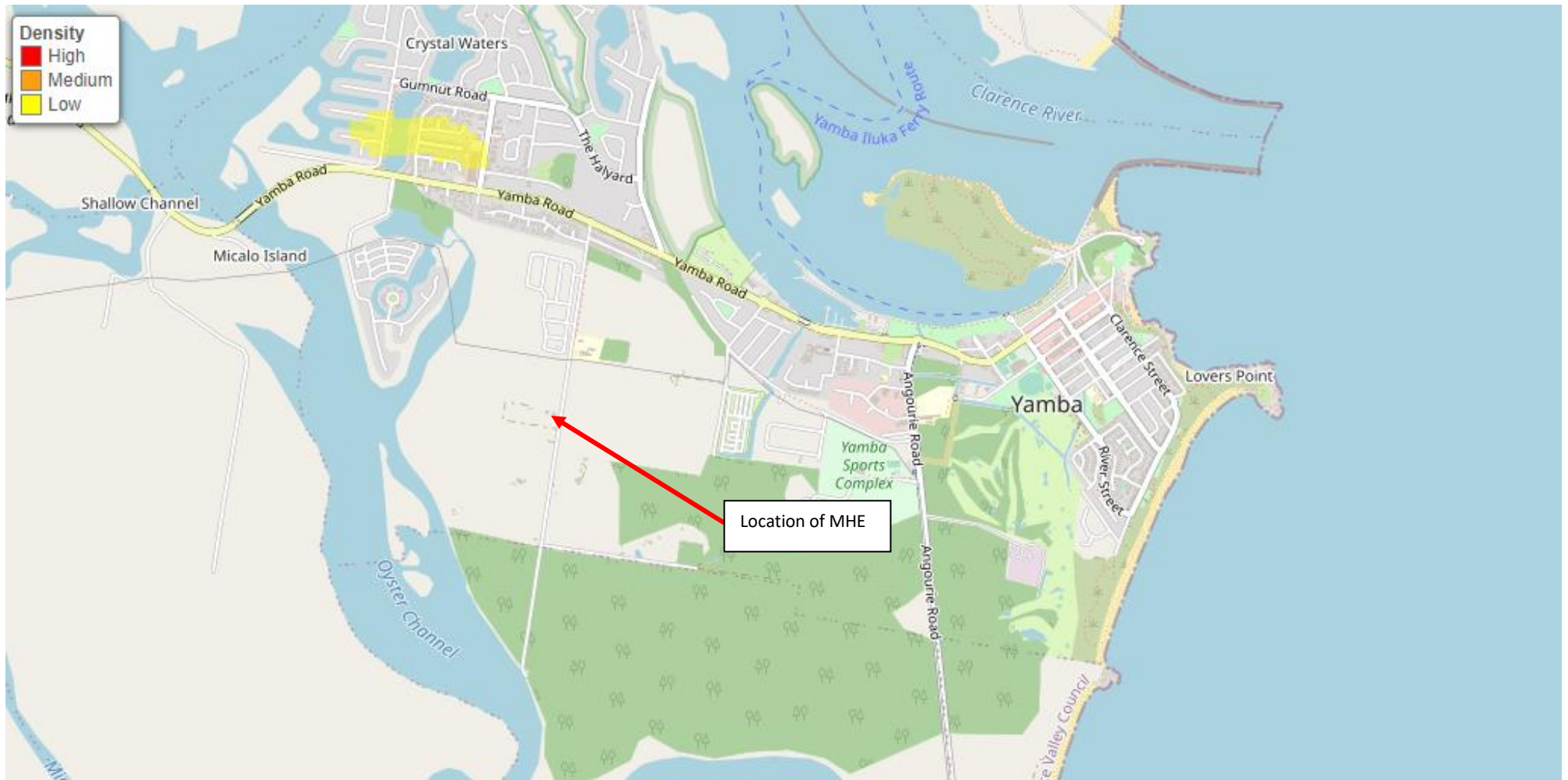
Figure 6: Incidents of Theft (Break & enter dwelling) from July 2021 to June 2022
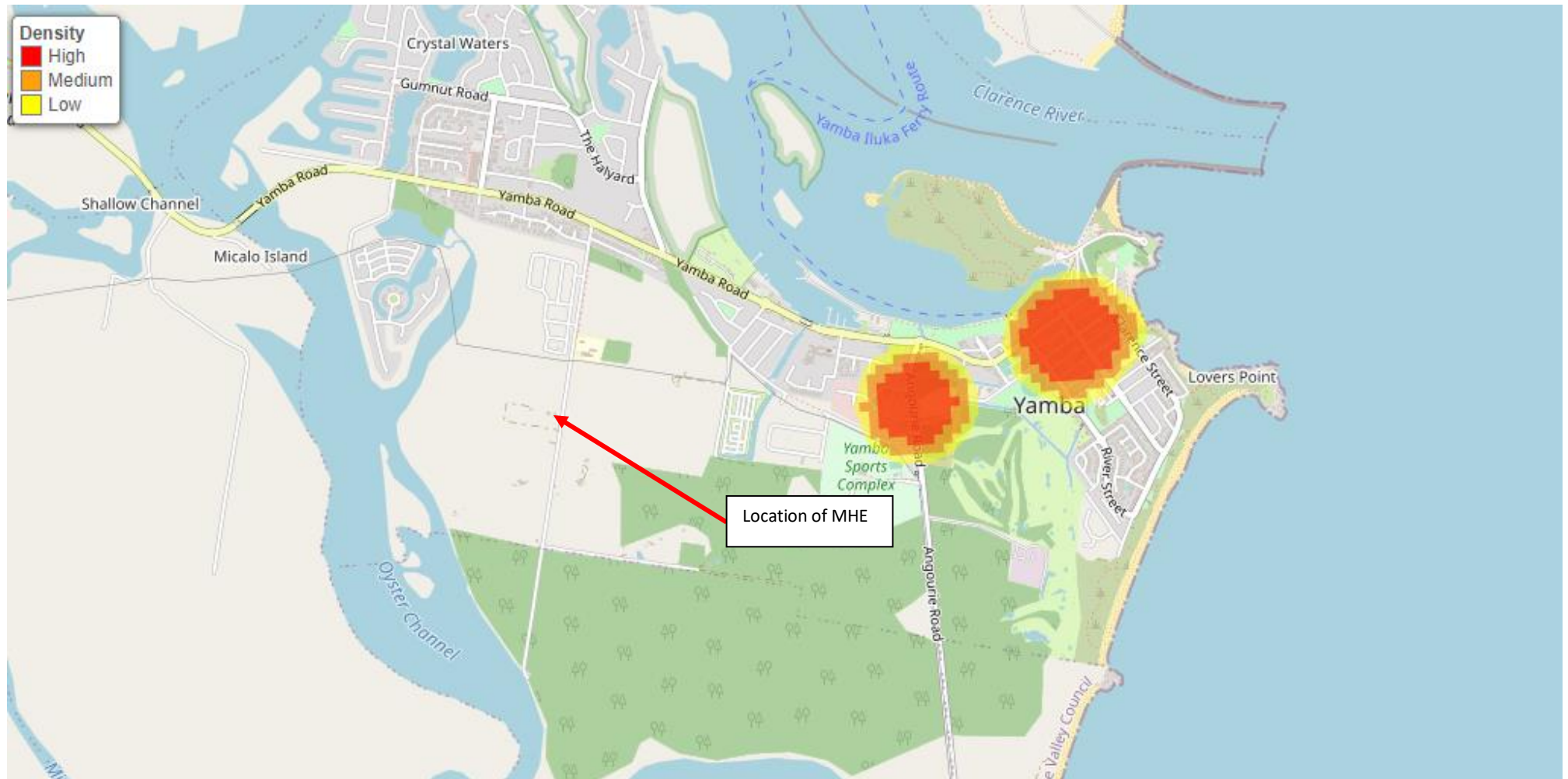
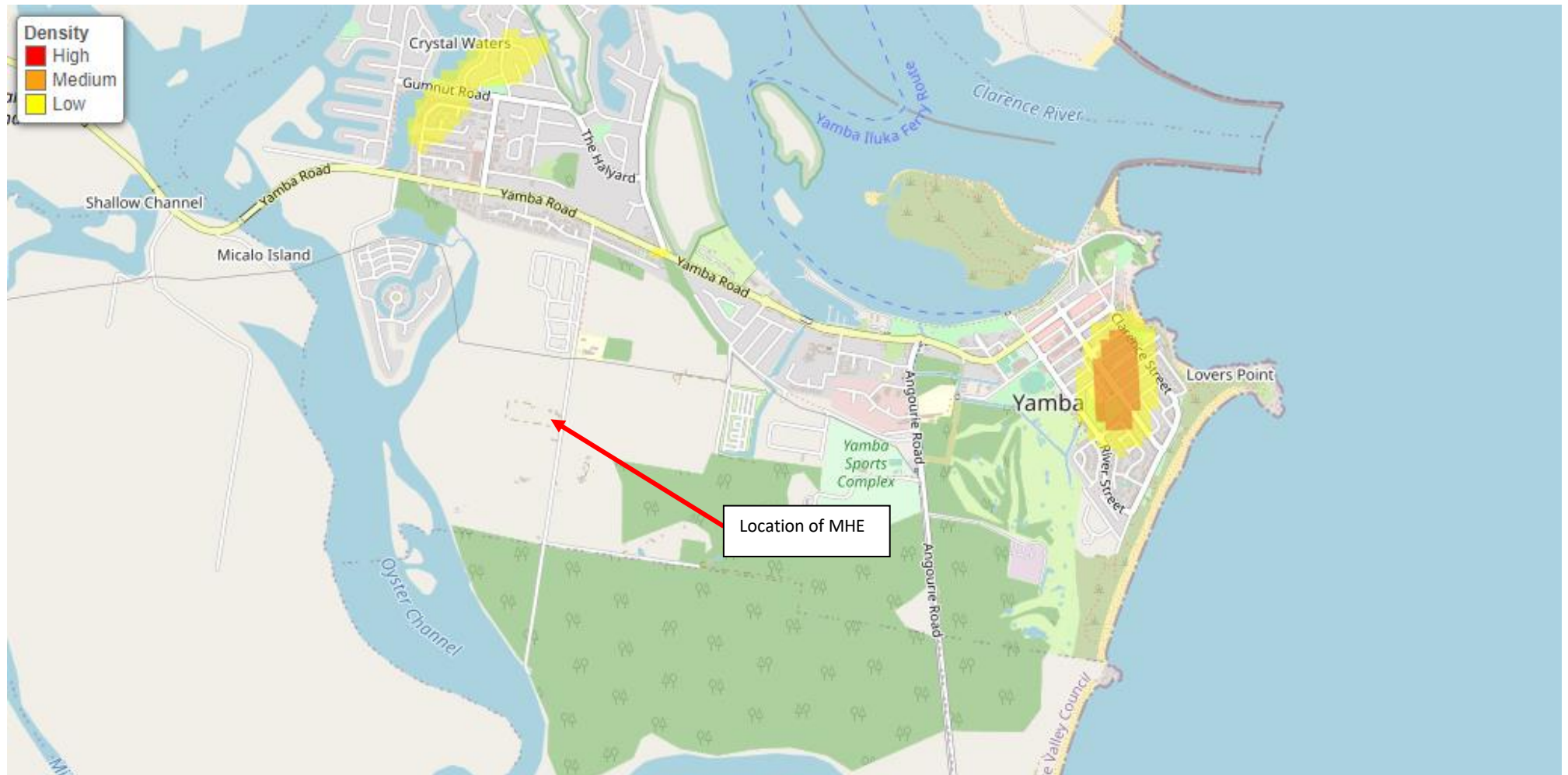**Figure 7: Incidents of Theft (Break & enter non-dwelling) from July 2021 to June 2022**

Figure 8: Incidents of Theft (Motor vehicle theft) from July 2021 to June 2022
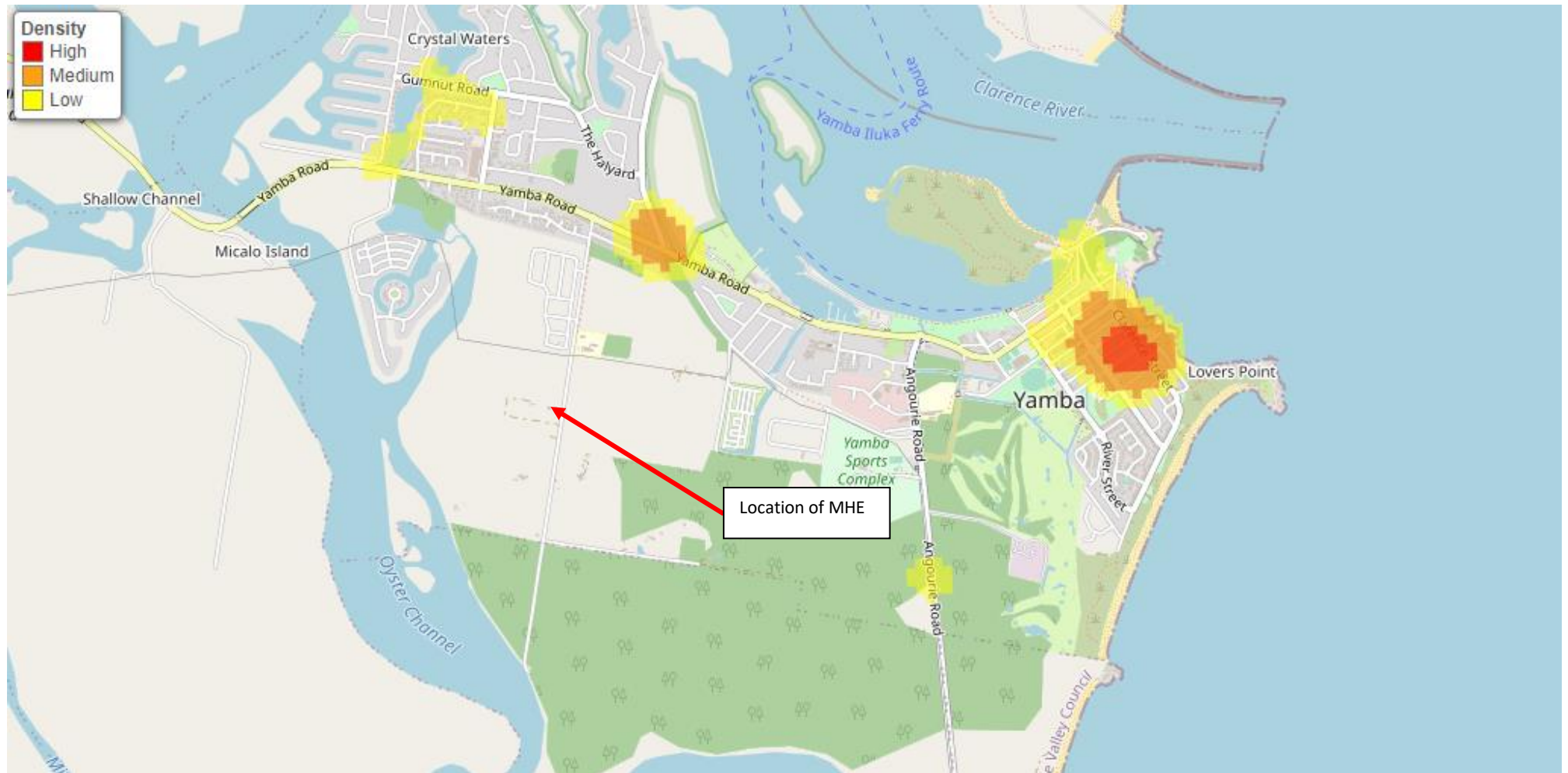
Figure 9: Incidents of Theft (Steal from motor vehicle) from July 2021 to June 2022
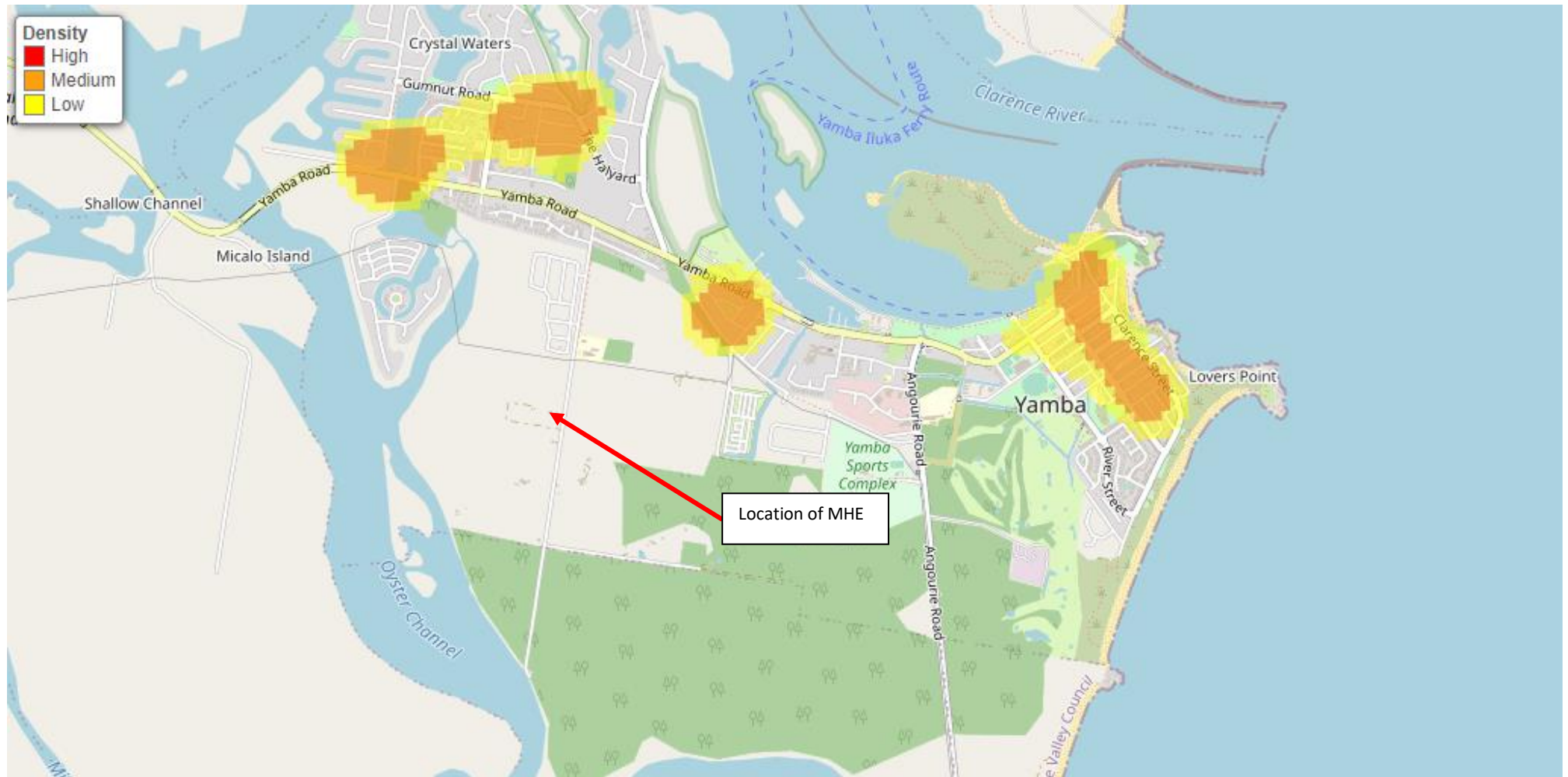
Figure 10: Incidents of Theft (Steal from dwelling) from July 2021 to June 2022
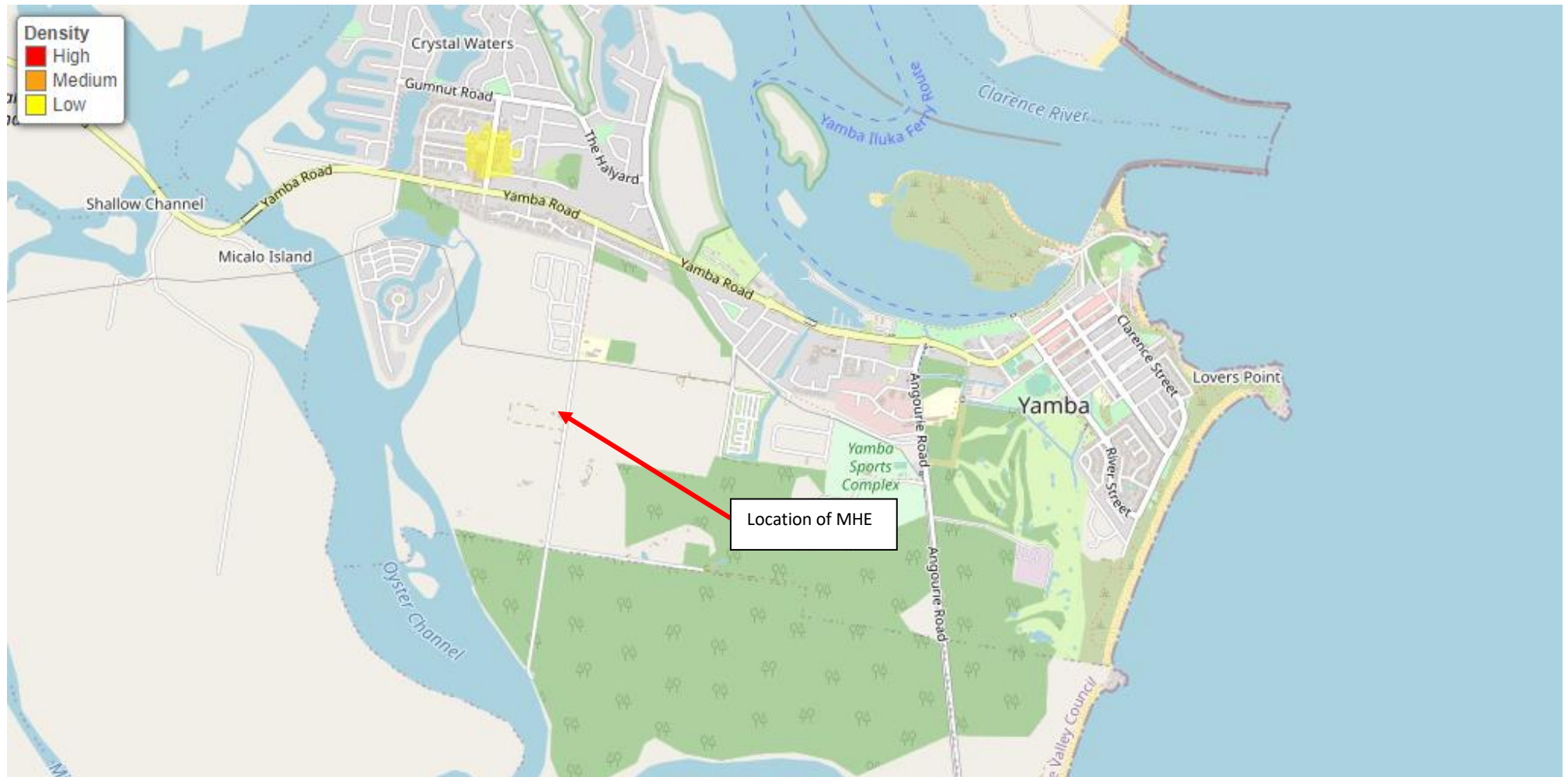
Figure 11: Incidents of Theft (Steal from person) from July 2021 to June 2022
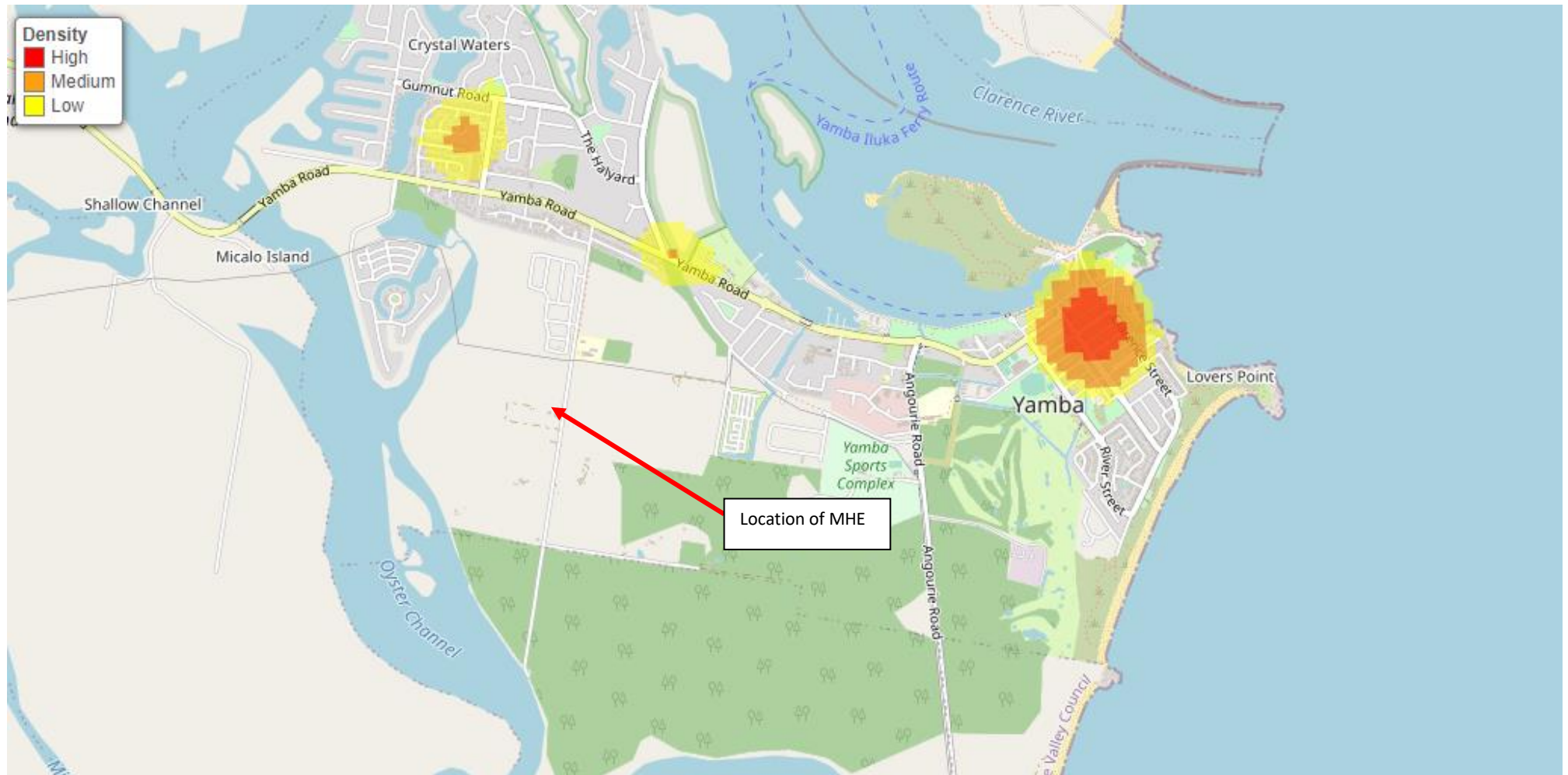
Figure 12: Incidents of Malicious damage to property from July 2021 to June 2022

4. General Recommendations

The following CPTED principles are recommended for the proposed site:

4.1 Territorial re-enforcement
- The use of a fence along the property boundaries is required. Given the characteristics of the western boundary a rear boundary fence is not required as access is unlikely.

- A boom type gate to be installed (entry / exit) which is accessible via a code.

- Signage at entry points into the site should be erected and clearly identify direction of travel and areas where entry is prohibited.

- Clearly signpost any area in the site where access is prohibited or is private (i.e. staff entry / service entry, grounds, the rear of the site etc.).

4.2 Surveillance
- Landscaping should not inhibit natural surveillance (block sight lines) or provide concealment and entrapment opportunities. When selecting and maintaining vegetation, consideration should be given to the possibility of areas becoming entrapment sites in the future. Heavy vegetation should also be avoided at the entrance areas of all the buildings throughout the site so as not to provide concealment opportunities and inhibit line of sight. Shrubs should not be greater than 1 metre in height and the canopy of tall trees should be higher than 1.8 metres.

- The building design should not inhibit natural surveillance (block sight lines) or provide concealment and entrapment opportunities. It is recommended that the set back of entry foyers and door recess be a maximum of 1 metre.

- Australian and New Zealand Lighting Standard 1158.1 – Pedestrian, requires lighting engineers and designers to consider crime risk and fear when selecting lamps and lighting levels.

- Pathways / line of pedestrian travel should be lit with low lighting to mark the path of travel.

- Capacity for the installation of duress alarms to be incorporated for residences.

- CCTV is recommended at entry point(s).

4.3 Access control
- All entry points (pedestrian and vehicle) should be clearly signposted and identify the area as being private property.

- Trees should not be planted close to any buildings (i.e. club house) as it creates a 'natural ladder' to the roof of any building.

- All contractors to register at a central point for WHS reasons and for awareness of who is on site. Contractors are recommended to carry a visitors tag / lanyard for the duration of their visit. This will minimise unauthorised entry.

4.4 Space / Activity Management
- Directional signage is to be provided throughout the development. The signage is to be clear and legible to aid 'way finding' throughout the development, especially for visitors.

- Installation of 'Park Smarter' signage (or similar) is recommended to minimise opportunity for theft from vehicles, in particular in the car park at the rear of the site.

- The area (including gardens, fencing) should be well maintained. Any evidence of anti-social behaviour (e.g. graffiti, malicious damage, broken lights etc.) should be cleaned / fixed / replaced within 24 hours. A maintenance plan should be developed for the site.

- Regular walk through to ensure the site is kept clean and also monitor the grounds.

4.5 Design Layout Comments
The following comments relate to the design of the proposed facility.

Figure 13: Site Layout Comments
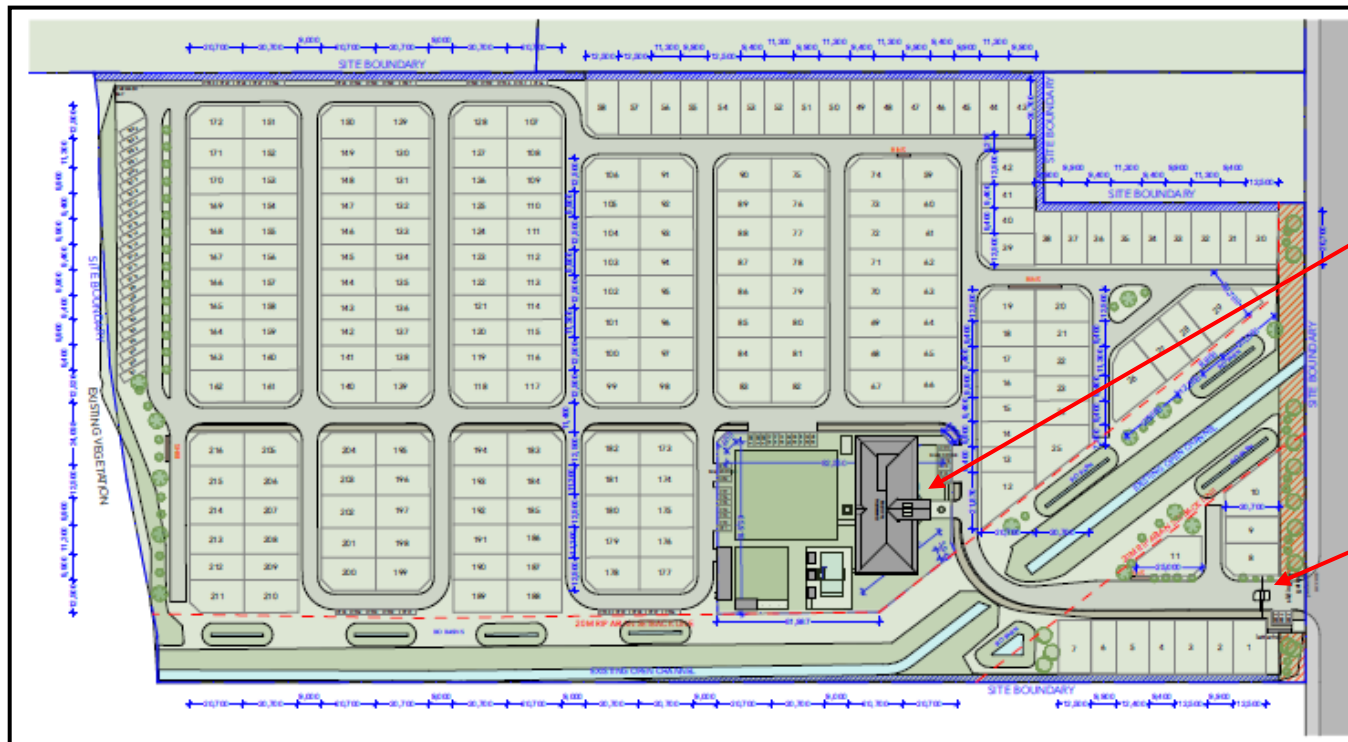
Boundary fence to northern, southern and eastern boundaries would be required.

The location of the community facilities within the site is positive as it will aid surveillance.

Entry points to have a boom gate entry (accessible via entry code) and CCTV.

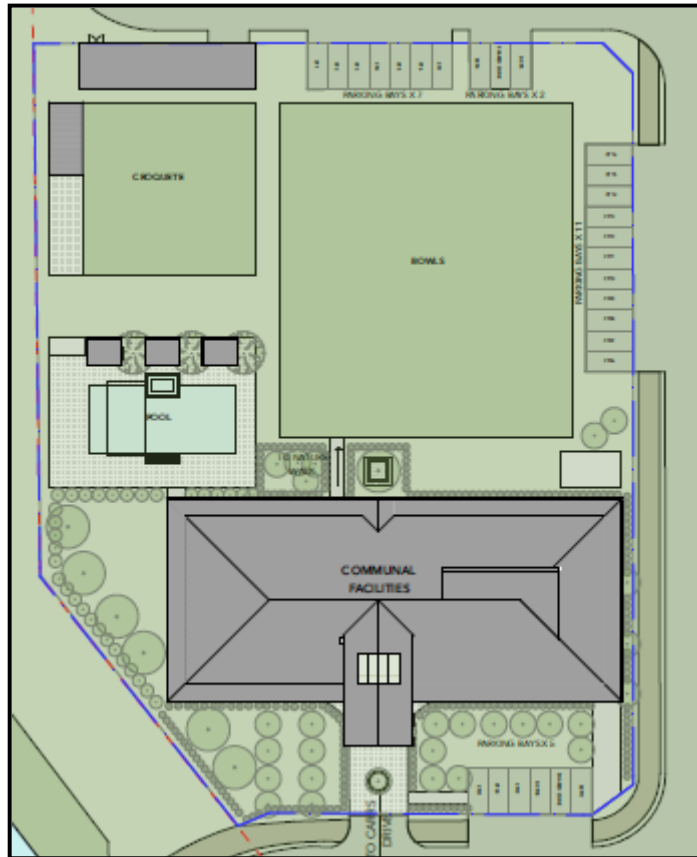Directional signage is required to assist with wayfinding around the site.

Figure 14: Open Space Comments

Ensure that pedestrian access is clearly defined and 'no go' areas are signposted.

Maintain facilities and incorporate maintenance plan into this area.

Bollards / fencing to be installed to prevent vehicles accessing the bowling areas.

Figure 15: Communal Building Comments
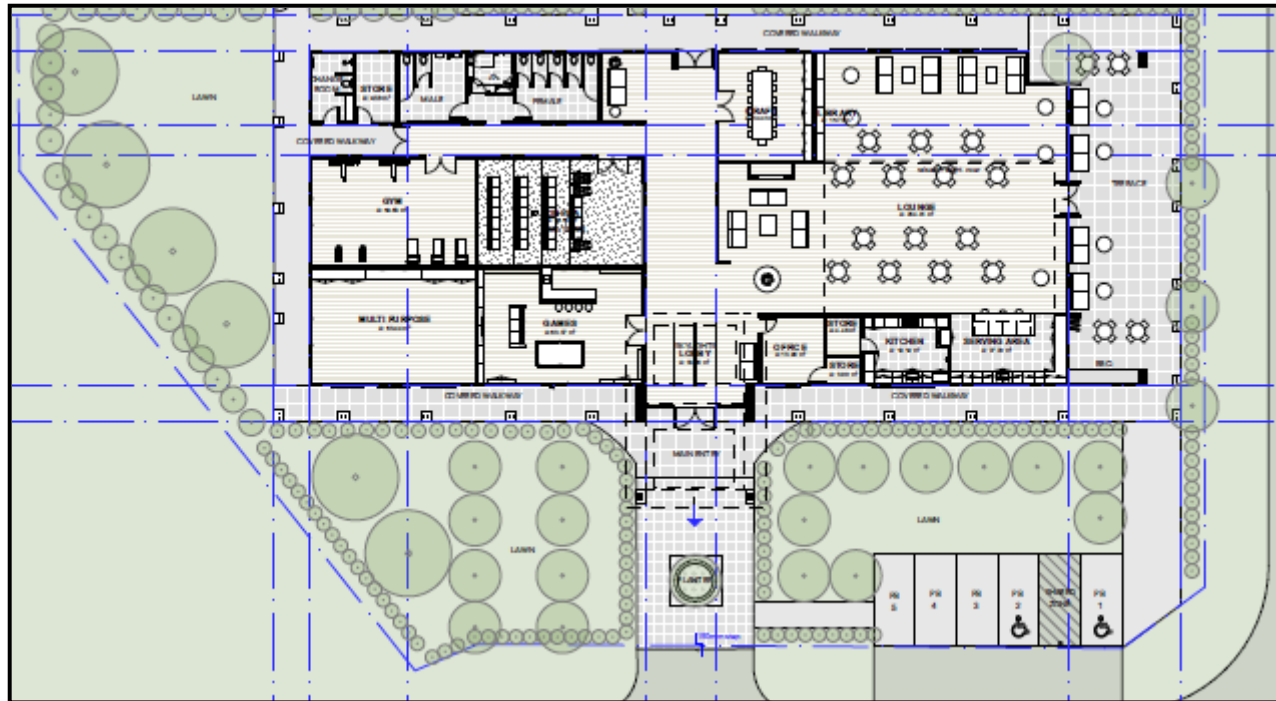
Open plan is positive

Ensure widows are kept clear of posters etc. so as not to inhibit line of sight

Trees not to be planted near the building as this provides concealment and possible 'natural ladder'

CCTV at entry points

Back to base alarm to be installed

Expectations of users to be clear regarding behaviour and how the premises are left.

5. Conclusion

The CPTED assessment of the proposed MHE at 120 Carrs Drive Yamba, has taken into account factors such as the building design / layout, area characteristics and crime data for the LGA and suburb.

The crime trend data and hot spot maps show that the proposed development site and surrounding area is not an area where there is a high incidence of crime. However while the area is not generally developed, existing land uses around the site have not been targeted for crime (e.g. emerging development, school).

Overall design elements are generally consistent with CPTED principles. Furthermore, the site manager will provide a supervisory / monitoring role for the site. This, together with the adoption of the strategies outlined in this report, the crime risk is considered to be low.