12 December 2022

General Manger
Eurobodalla Shire Council
PO Box 99
Moruya 2537

Updated CPTED Report, St Peters Broulee

Mecone NSW Pty Ltd (Mecone) has been engaged by Colliers on behalf of the proponent in relation to a development application for the St Peter's School in Broulee. It is understood that a Request for Information was issued by Council in relation to the Crime Prevention Through Environmental Design (CPTED) review.

Please find enclosed updated CPTED Report, and comments below in response to Council's queries.

1. **Car Park Operation and Lighting Strategy**

   It is understood that only the car park located at the front of the campus is intended to be operated out of school (and daylight hours) for use by gym attendees, and those attending occasional out of hours events such as assemblies, awards presentation etc. Other car parks will be generally limited to operating during school/daylight hours.

   CPTED Comment: Adequate lighting shall be provided to car park and pedestrian areas intended to be used outside of daylight hours, installed to meet Australian Standard (AS/NZ-1158). The CPTED report has been amended to clarify this. Other car parks shall be sign posted to reflect hours of operation being limited to school/daylight hours, and appropriate measures shall be taken to communicate that only the front car park shall be used after hours by gym attendees.

2. **Acoustic Wall near Eastern Boundary**

   It is understood that an acoustic wall is required to be located near the eastern boundary based on the recommendations of an Acoustic Impact Assessment. The wall cannot be located exactly on the eastern boundary due to heritage constraints. As such, a small area of ambiguous space has resulted between the proposed acoustic wall and existing residential properties.

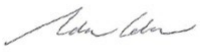
   CPTED Comment: Mecone understands that the location of this wall is unavoidable based on acoustic and heritage advice. Consideration shall be given for the use of transparent building materials for all or part of the

construction to help reduce opportunities for concealment or loitering near adjoining residential properties. In addition, signage shall be installed which confirms this area is out of bounds for student use. Consideration should be given for low rise planting adjacent to out of bounds areas (where possible with consideration for heritage constraints) to reinforce that it is not a thoroughfare area. These recommendations have been added within Sections 8.1 and 8.3 of the attached CPTED Report.

Subject to the implementation of report recommendations, the proposed development will provide an acceptable outcome from a CPTED perspective.

We trust the above information and attached CPTED report satisfies Council's queries.

Yours sincerely,



Adam Coburn
Director

Crime Prevention Through Environmental Design (CPTED) Report

St Peter's Anglican College

61 Train Street, Broulee
Lot 1 DP 1037342

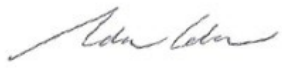
Prepared on behalf of Colliers

12 December 2022

mecone

Project Director

Adam Coburn



12 December 2022

Project Planners

Erin Crane

Belinda Elogious

*This document is for discussion purposes only unless signed and dated by project director.

Contact

Mecone
Level 2, 3 Horwood Place
Parramatta, New South Wales 2150
info@mecone.com.au
mecone.com.au

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Appendices

1 Introduction

This Crime Prevention Through Environmental Design (CPTED) has been prepared on behalf of Colliers (the applicant) to support a Development Application (DA) for alterations and additions to the existing school at St Peter's Anglican College, Broulee submitted to Eurobodalla Shire Council (Council) relating to land at 61 Train Street, Broulee being Lot 1 DP 1037342 (the Site).

The proposed development includes additions incorporating a number of new buildings and extensions together with revisions to the existing bus drop-off and car parking areas within the St Peter's Anglican College at Broulee established in 2003.

The proposed works include:

- 2,830m^2 sports and recreation centre (p10) located near the eastern boundary
- 470m^2 community and administration building (p7) located in the south of the site near the campus car park
- Extension to the existing cultural centre in the north east corner of the site (p6)
- New 665m^2 junior school classroom building (p5) in the central southern part of the campus
- Revisions to the bus drop off area
- Formalisation of the existing staff car park, including 38 parking spaces
- New staff car park containing 55 parking spaces
- New hardcourts and oval in the northwest part of the campus
- Undercover open space area
- New waste enclosure area

This CPTED report assesses the proposal in terms of the key principles of CPTED and provides recommendations that can be implemented as part of the detailed design for the site.

The proposed concept plans submitted with the development application are generally acceptable from a CPTED perspective. Subject to the implementation of the recommendations of this report, the proposed development is capable of providing a satisfactory CPTED response.

1.1 Report Structure

The structure of this report is as follows:

- Chapter 1 introduces the report
- Chapter 2 provides an overview of applicable CPTED legislation
- Chapter 3 provides an overview of the site's context
- Chapter 4 outlines the proposed masterplan
- Chapter 5 details the methodology used in this assessment
- Chapter 6 provides an overview of applicable CPTED policy
- Chapter 7 provides an overview of crime in the surrounding area
- Chapter 8 provides an assessment of how the proposal promotes the development of a safe urban environment and provides CPTED recommendations which can be implemented as the project progresses.

- Chapter 9 concludes the report

Additionally, an assessment against the NSW Police Force CPTED Checklist is provided at **Appendix 1**.

1.2 Author

The author (Adam Coburn) has completed the Safer by Design Course by the NSW Police Force, which provides CPTED approved courses and qualifies the author to prepare this report. The report contributor (Erin Crane) is suitably experienced in preparing CPTED Reports and has also undertaken industry recognised training, being the Local Government NSW Crime Prevention through Environmental Design training.

2 Legislative Requirements

Local and State Government organisations have an obligation to assess whether a development provides safety and security to users and the community. An overriding objective of the Environmental Planning and Assessment Act 1979 (EP&A Act) is:

(a)to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,

Before a decision can be made on a Development Application (DA) in accordance with Part 4 of the EP&A Act, a consent authority (generally, a local council) must consider the application under section 4.15 of the EP&A Act. Included in Section 4.15 are a number of sub-sections requiring the consent authority to consider the following matters:

(a) the provisions of—

(i) any environmental planning instrument, and

(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and

(iii) any development control plan, and

(iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and

(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),

(v) (Repealed)

that apply to the land to which the development application relates,

(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.

The NSW Department of Planning and Environment (DP&E) has prepared guidelines under Section 4.15 of the EP&A Act entitled "Crime prevention and the assessment of DAs: Guidelines under Section 4.15 of the Environmental Planning and Assessment Act 1979" (the CPTED Guidelines). These guidelines aim to help councils consider and implement CPTED principles when assessing DAs.

Some Councils have also incorporated specific CPTED provisions within their Development Control Plans (DCPs) as a matter for consideration under Section 4.15.

As a matter of best practice, public authorities and governments usually consider the assessment of projects against the CPTED Guidelines as critical to the consideration of any matters likely to affect the environment.

A concept that has emerged more recently is that of Crime Prevention through Environmental Management (CPTEM). CPTED assessments now often consider, and make recommendations about, ongoing management arrangements. This is an

important element of ensuring crime prevention is supported not only through the design process but also through on-going use of the development.

2.1 Additional Policy Requirements

In addition to the legislated requirements in NSW, the NSW Police CPTED Guideline sets out the high level CPTED design considerations which can be implemented across various project types. An assessment against the NSW Police CPTED Guideline is provided at Appendix 1 of this report.

The Eurobodalla Shire 'Safer by Design' Code 2011 applies to all development within the Eurobodalla Shire LGA. The code aims to promote a safe environment for the community by minimising the risk of crime, ensuring the security of residents and visitors and their property, and enhancing the perception of community safety. The Code generally reflects the principles and considerations set out in the NSW Police Guideline. Consideration of the Safer by Design Code is required as per Eurobodalla Shire Residential Zones Development Control Plan 2011. An assessment against the code is provided within Part 6.3 of this report.

In 2021, the International Organization for Standardization published ISO 22341:2021 Security and resilience — Protective security — Guidelines for crime prevention through environmental design. This document provides guidelines to organisations for establishing the basic elements, strategies and processes for preventing and reducing crime and the fear of crime at a new or existing built environment. It recommends the establishment of countermeasures and actions to treat crime and security risks in an effective and efficient manner by leveraging environmental design. It is understood that the NSW Legislative and Policy Framework is generally reflective of the new international standard.

3 Site Analysis

3.1 Site Context

The site is legally described as Lot 1 DP 1037342 being 61 Train Street, Broulee with a site area of 10.87 hectares.

The site located on the western fringe of the suburb of Broulee within the Eurobodalla Shire Local Government Area (LGA).

The site is bounded by Train Street to the south and George Bass Drive to the west.

The site is currently occupied by St Peter's Anglican College which was established in 2003. It accommodates a student population of just around 700 students across a Prep School for 4-year-olds, a Junior School for Kindergarten to Year 6, and a Senior School for Years 7 to 12.

The Campus is fully established and operational with an extensive range of teaching and administration buildings, sporting fields and courts, bus drop-off area and main parking area near the Train Street frontage, informal staff carparks, and ancillary and support buildings and facilities.

The College Campus was affected by the 2019-2020 bushfires during which a number of buildings were lost or damaged.

Figure 1: Site Aerial (Source: Metro Map)

The site has existing vehicular access points at Train Street in the south and at each end of Caitlin Crescent in the north. Formalised vehicle access is provided from Train Street, however the school grounds and parking areas are largely screened from street view due to the existing native vegetation along the southern boundary. Similarly, the western boundary includes dense native vegetation which separates the campus

from George Bass Drive. Access from Caitlin Crescent is informal via an unformed vehicle crossover and dirt road. It is understood this access point is for maintenance purposes only and not intended for general use by staff or school patrons. Figures 2-4 below illustrate key access points and surrounding street views.

Figure 2: Street view from Train Street, looking west towards the main entry (Source: Google Maps)

Figure 3: Street view from George Bass Drive, looking northeast towards school grounds (Source: Google Maps)

Figure 4: Street view from Caitlin Cres, looking south west towards school ground (Source: Google Maps)

3.2 Surrounding Development

The site is located on the western fringe of the suburb of Broulee within an existing low density residential area. One to two storey residential dwellings are located to the north and east of the site.

To the west of the site is Illawong Nature Reserve which is located beyond George Bass Drive.

To the south of the site is Broulee Public School, Broulee Longs Day Care Centre, Broulee Early Learning Centre with bushland located further south these buildings. Captain Oldrey Park is located south east of the site.

Broulee can be described as a coastal village and the school sits in a peri-urban setting in the outer reaches of the township. Broulee residential areas are entirely surrounded by rural and conservation zones which are heavily vegetated with biodiversity values.

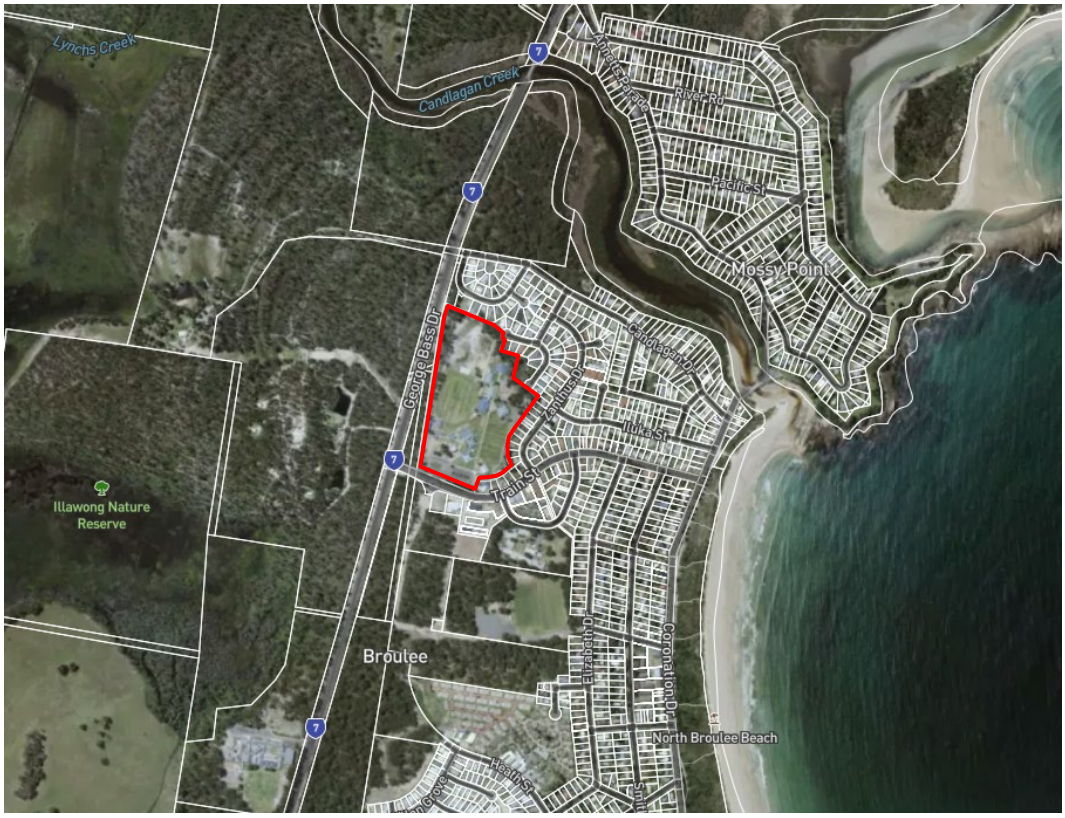

Figure 5: Site Context (Source: Metro Map)

4 Proposed Development

The proposed development includes the following new buildings and works:

- Demolition of existing structures and removal of trees;
- Construction of new Sports and Recreation Centre building that will cater for the College community and also the wider Broulee community;
- Construction of new Community Hub and Admin building;
- An extension to the existing Cultural Centre to provide music practice rooms, small recording studios, enlarged classrooms and additional storage;
- Construction of new Junior School classroom;
- Revision of the existing bus drop-off area near the Campus's Train Street frontage;
- Relocation of playing field and new hardcourts, tennis courts and cricket practice area;
- Extension and revision of the main carpark near the Train Street frontage;
- Formalisation of the southern and northern staff carparks;
- Designation of a site for a proposed Open Air Chapel;
- A new waste management enclosure.

The proposed buildings and works are to be constructed in two stages as specified in the Staging Plan prepared by Cox Architecture.

Architectural extracts of the proposed development are provided below.

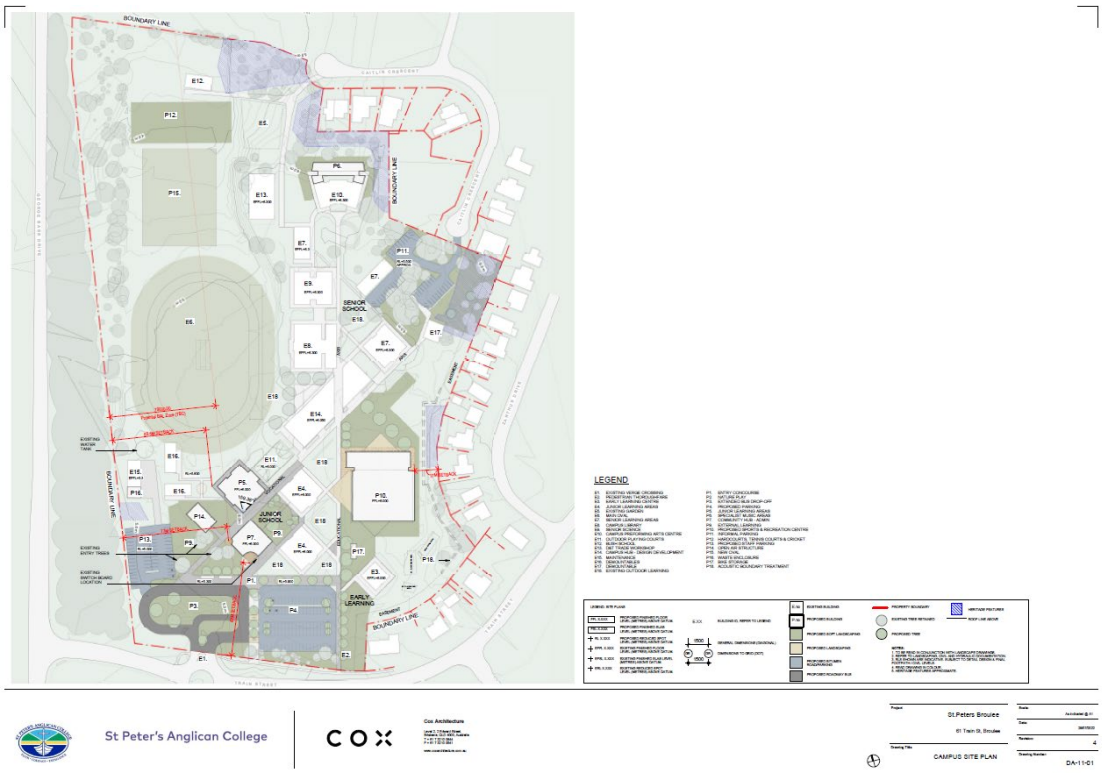

Figure 6: Site Plan (Source: Cox Architecture)

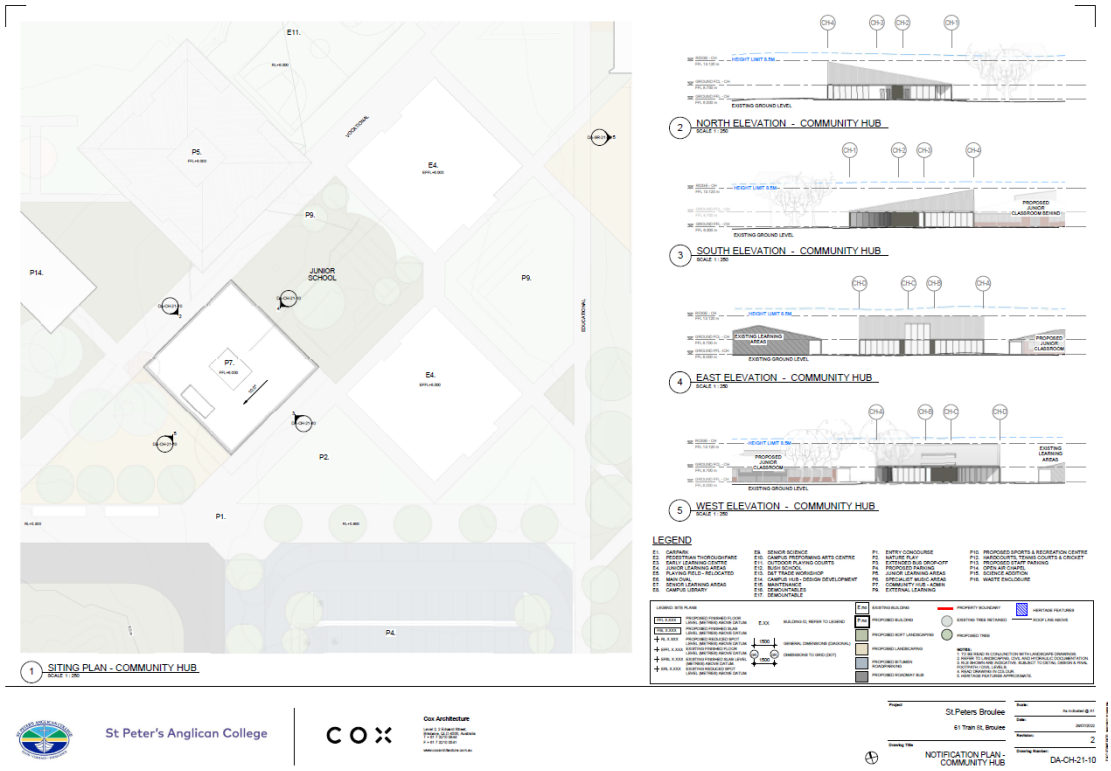

Figure 7: Community Hub Plan (Source: Cox Architecture)

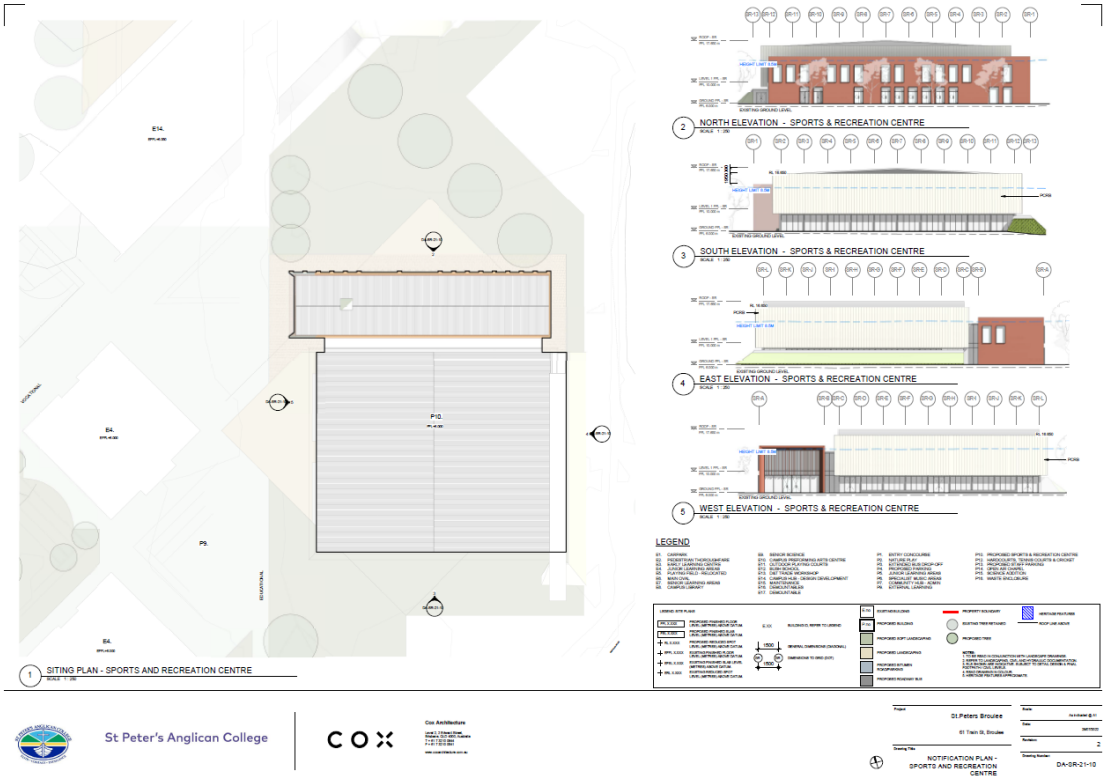

Figure 8: Sports and Recreation Centre Plan (Source: Cox Architecture)

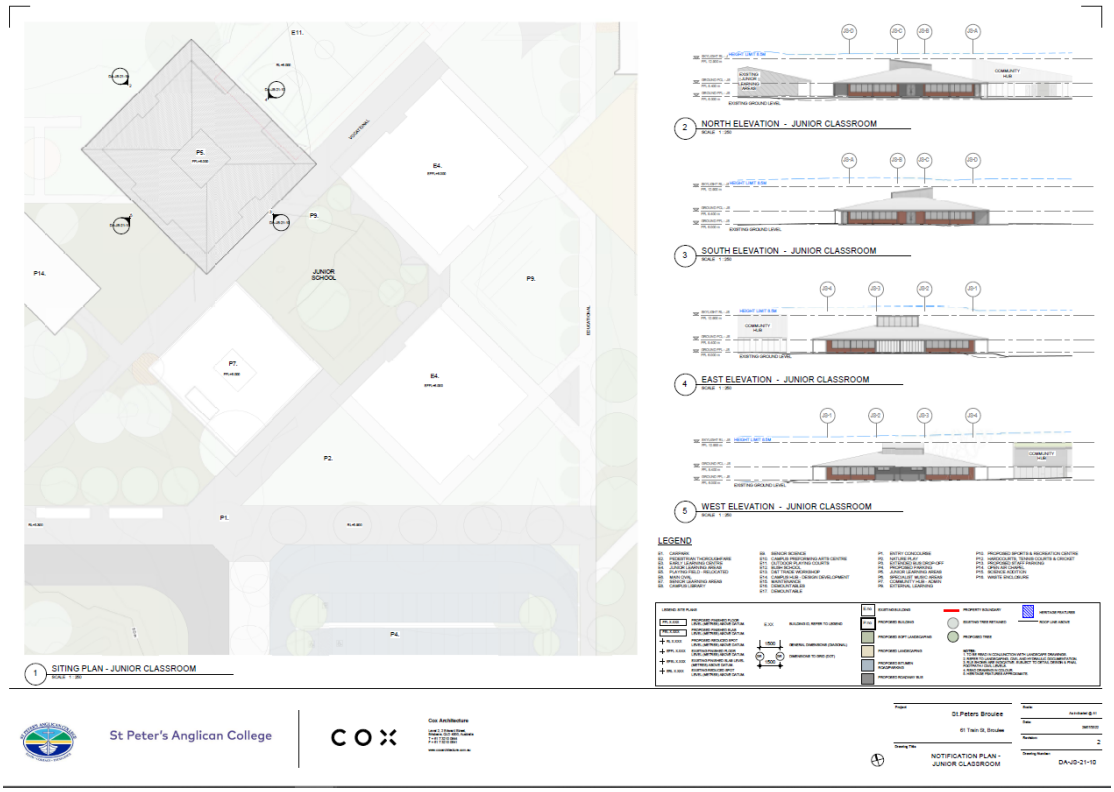

Figure 9: Junior Classroom Plan (Source: Cox Architecture)

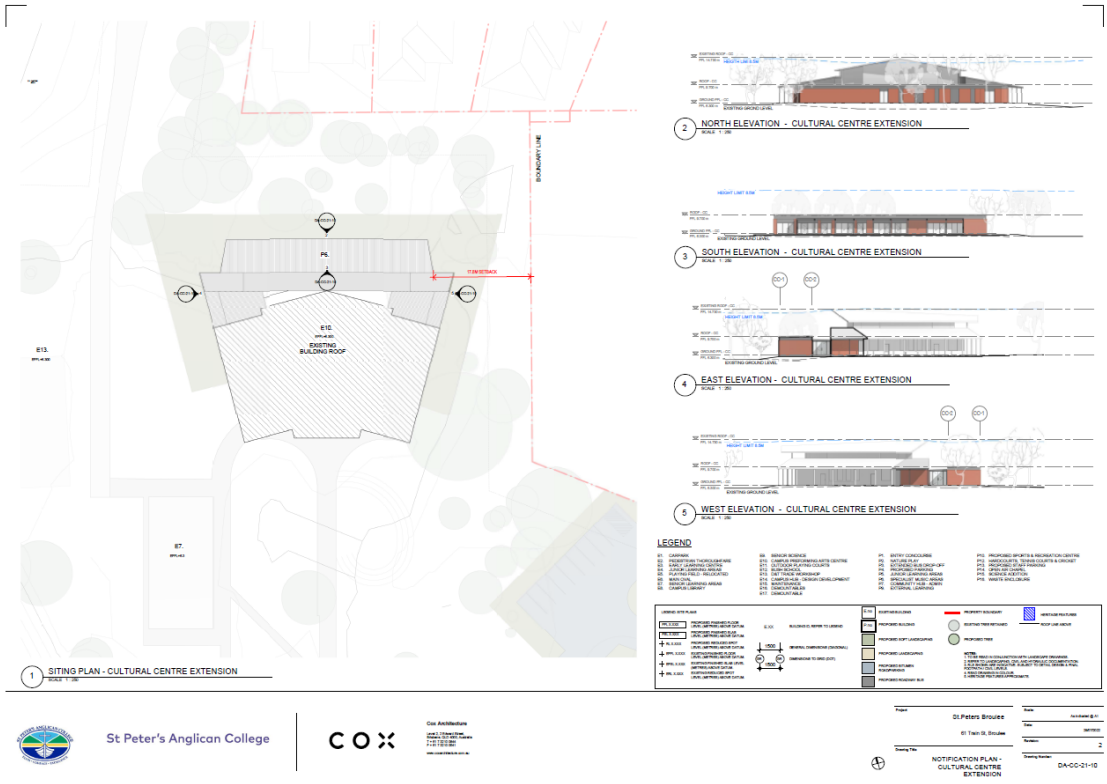

Figure 10: Cultural Centre Extension Plan (Source: Cox Architecture)

Figure 11: Perspective of Sports and Recreation Centre (Source: Cox Architecture)

Figure 12: Perspective of development looking north from Train Street(Source: Cox Architecture)

5 Methodology

The following key tasks and stages have been undertaken as part of this CPTED assessment.

Part 6: Policy Review

- NSW Government CPTED Guidelines
- Eurobodalla Shire Residential DCP 20111
- Eurobodalla Shire Council Safer by Design Code 2011

Part 7: Crime Profile

- Desktop site analysis – a safety audit was conducted to assess potential situational crime risks related to the proposed masterplan design, in accordance with the current NSW policy and practice. The analysis took into consideration the following regulation and assessment principles:
    - Surveillance
    - Lighting/technical supervision
    - Territorial reinforcement
    - Environmental maintenance
    - Activity and space management
    - Access control
- Review of crime data and statistics to identify potential crime issues - collection and analysis of local and NSW State crime statistics from the Bureau of Crime Statistics and Research (BOCSAR)

Part 8: CPTED Assessment and Recommendations

- Review and assessment of the proposed development and identification of potential crime risks associated with the proposed development
- Identification of potential mitigation measures.

6 Policy Review

6.1 NSW Government CPTED Guidelines

This report utilises the principles of CPTED, which are based on a situational approach to crime prevention, which seek to minimise the risks for possible crime offences to occur. This is achieved by:

- increasing the possibility of detection, challenge and capture;
- increasing the effort required to commit crime;
- reducing the potential rewards of crime by minimising, removing or concealing 'crime benefits'; and
- removing conditions that create confusion about required norms of behaviour.

Notwithstanding this, the report and approach acknowledges that any design strategy proposed cannot operate effectively in isolation and is one element of a broader approach to a crime prevention strategy that includes social and community inputs and complementary strategies.

There are four key CPTED principles laid out in the CPTED guidelines:

- Natural Surveillance;
- Access Control;
- Territorial Reinforcement; and
- Space Management.

These are discussed in greater detail below.

Natural Surveillance

NSW police defines natural surveillance as:

> *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.*

It relates to keeping intruders under observation. Natural surveillance allows people to engage in their normal behaviour while providing maximum opportunities for observing the space around them.

This is achieved by:

- Orienting buildings, windows, entrances and exits, car parks, rubbish bins, walkways, landscape trees and shrubs, in a manner that will not obstruct opportunities for surveillance of public spaces;
- The placement of persons or activities to maximise surveillance possibilities; and
- Provide lighting for night-time illumination of car parks, walkways, entrances, exits and related areas to promote a safe environment.

Access Control

NSW Police defines access control as:

> *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.*

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.

It relates to decreasing criminal accessibility. This is achieved by:

- Using footpaths, pavement, gates, lighting and landscaping to clearly guide the public to and from entrances and exits; and
- Using of gates, fences, walls, landscaping and lighting to prevent or discourage public access to or from dark or unmonitored areas.

Territorial Re-enforcement

NSW Police defines territorial re-enforcement as:

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.

It relates to clearly defining private space from semi-public and public spaces that creates a sense of ownership.

This is achieved by:

- Enhancing the feeling of legitimate ownership by reinforcing existing natural surveillance and natural access control strategies with additional symbolic or social ones;
- Design of space to allow for its continued use and intended purpose; and
- Use of landscaping and pavement finishes, art, screening and fences to define and outline ownership of space.

Space and Activity Management

NSW Police defines space/activity management as:

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. Places that are infrequently used are commonly abused. There is a high correlation between urban decay, fear of crime and avoidance behaviour.

The placing activity where the individuals can engage in an activity becomes part of the natural surveillance is known as activity support. This is achieved by:

- Locating safe activities in areas that will discourage would be offenders;
- Locating activities that increase natural surveillance; and
- Locating activities that give the perception of safety for normal users, and the perception of risk for offenders.

6.2 Eurobodalla Shire Residential Zones DCP 2011

The Eurobodalla Shire Residential Zones Development Control Plan 2011 (ESDCP) requires the CPTED provisions under the Safer by Design Code created by Council to be considered for all applications.

Table 2. Eurobodalla Shire Residential Zones DCP Assessment	
Control	Assessment
2.9 Safer by Design	
A1.2 All development must comply with the Safer By Design Code	Refer to Section 6.3

6.3 Eurobodalla Shire 'Safer by Design' Code 2011

The Eurobodalla Shire 'Safer by Design' Code 2011 applies to all development within the Eurobodalla Shire LGA. The code aims to promote a safe environment for the community by minimising the risk of crime, ensuring the security of residents and visitors and their property, and enhancing the perception of community safety.

An assessment against the 'Safer by Design' Code is provided in Table 3 below.

Table 3. Eurobodalla Shire 'Safer by Design' Assessment	
Control	**Assessment**
Building Design	
Are the entries clearly identifiable?	The formalised school entry is clearly recognisable and sign posted on Train Street. An additional, informal entry is available from Caitlin Crescent which is understood to include signage which discourages vehicle entry and is locked outside of school hours.
Is there appropriate signage?	The current signage is appropriate. It is recommended that signage is updated as necessary at site entries to reflect the new site layout to enable safe access, wayfinding and emergency egress. Signage shall be installed in locations which are clearly visible and the nature of the signage shall deter vandalism (ie. pole signage installed at appropriate heights to deter graffiti).
Have appropriate lighting and pathways been provided to entrances and car parking?	The proposed lighting is unclear on the DA documentation, however can reasonably be implemented at detailed design and construction phases. Where car parks are proposed to be open after daylight hours, it is recommended lighting be installed to meet the Australian Standard (AS/NZ-

Table 3. Eurobodalla Shire 'Safer by Design' Assessment	
	1158) for pedestrian routes and carparking areas. Each car park shall be sign posted to reflect car park hours of operation. For example, it is understood that only the front of campus car park will be open for after hour gym access, and after hour events such as presentations or assemblies. Adequate lighting shall be provided in this regard to suit operational uses.
Do the habitable rooms face public/communal space?	The development is a campus style school layout. The administrative and classroom buildings include entries which orient towards defined walkways, open spaces and play areas. Entries generally orient away from the perimeter of the site to reduce privacy impacts to adjoining land users. Windows on perimeter facing elevations are generally minimised.
Have windows been located to allow natural surveillance?	Windows have been maximised on elevations oriented towards walkways, open spaces and play areas, encouraging natural surveillance and passive onlooking of adjoining spaces during school hours.
If located on a corner, does the building design address both streets? Are building materials vandal resistant?	Buildings are substantially setback from street frontages and are largely oriented inwards to address internal areas in a campus style layout. The proposed new buildings include modern, robust materials which are generally easy to clean and will not cause an ongoing maintenance burden.
Do architectural elements (such as down pipes) allow access to upper storeys?	Building elements such as downpipes and posts are naturally required to provide an efficient and functional building. Where climbable elements are proposed which could potentially provide access to upper storeys or roof areas (such as downpipes fixed to solid walls), landscaping treatments such as densely planted low rise garden beds, are recommended at

Table 3. Eurobodalla Shire 'Safer by Design' Assessment	
	ground level to deter access. It is noted that patterned brickwork is proposed in the schedule of finishes (BKF3). This finish is recommended to be limited to areas where it will not provide access to upper floors or roof space. Appropriate locations may include upper floors and on lower floors under awnings. If provided in locations which may be climbable, landscaping treatments, such as densely planted low rise garden beds are recommended at ground level to deter access.
Landscaping	
Does the landscaping comply with the Eurobodalla Landscaping Code?	Yes. Refer to Statement of Environmental Effects and submitted landscaping plans for further detail in this regard.
Do plantings allow for natural surveillance?	The existing vegetation along southern and western site boundaries is dense and restricts views to an extent to from the site from public streets. However, it is understood this vegetation has a biodiversity function and also provides a degree of privacy between the site and adjoining land users. Within the site itself, proposed planting is appropriate to allow for natural surveillance towards common walkways, open spaces and play areas.
Are plant species appropriately advanced and vandal resistant?	Yes. The plant species include a mix of exotic and native species which are robust and suited to a school environment.
Does landscaping clearly define public and private space?	The planting layout suitably complements a school environment.
Is the fence of an appropriate height and made of a visibly permeable material?	It is understood that the site includes existing low rise post and wire metal fencing, which enables visual permeability. No additional site fencing is proposed as part of this application. A 2.4m acoustic barrier is proposed as part of the development application, nearest to the eastern boundary.

Table 3. Eurobodalla Shire 'Safer by Design' Assessment	
	However this acoustic fence will be set back from the boundary of adjoining properties (due to heritage archaeological constraints) creating some ambiguous space in this location. Recommendations for this space, including the use of transparent materials, signage and landscaping are provided in Sections 8.1 and 8.3 of this report.
If the site is located on a corner, is the fence appropriate to both streets?	It is understood that the site includes existing low rise post and wire metal fencing to both Train Street and George Bass Drive.
Has adequate lighting been installed?	The proposed lighting is unclear on the DA documentation, however can reasonably be implemented at detailed design and construction phases. Where car parks are proposed to be open after daylight hours, it is recommended lighting be installed to meet the Australian Standard (AS/NZ-1158) for pedestrian routes and carparking areas. Each car park shall be sign posted to reflect car park hours of operation. For example, it is understood that only the front of campus car park will be open for after hour gym access, and after hour events such as presentations or assemblies. Adequate lighting shall be provided in this regard to suit operational uses.
Are sight lines clear and have possible places of concealment been addressed?	The proposed landscaping will not result in any undesirable opportunities for concealment.
Car Parking	
Does the car park comply with the Eurobodalla Parking and Access Code?	Yes. This is confirmed in the SEE.
Are the entrances and exits satisfactorily integrated into the building and landscape design?	Yes. Car park areas are complemented by adjoining landscaping and entry and exit opportunities are clearly defined.

Table 3. Eurobodalla Shire 'Safer by Design' Assessment	
Are elevators, stairwells and pedestrian accesses clearly visible?	Site wayfinding can be appropriately managed through the use of direction signage, maps at key entry and exit points and clearly identified emergency egress routes.
Is there appropriate lighting?	Proposed lighting details have not been included with the development application. It is recommended provide lighting at least to the Australian Standard (AS/NZ-1158) for pedestrian routes and carparking areas, with particular attention to the following areas: • Main pedestrian routes that will be in use at night, including the path to the Sports and Recreation Centre; • All car parking areas and the pedestrian routes thereto; • All entrances to the Campus from the adjoining public roads. • Ensure that lighting does not spill to adjoining residential premises or adversely affect fauna that is active at night. Each car park shall be sign posted to reflect car park hours of operation. For example, it is understood that only the front of campus car park will be open for after hour gym access, and after hour events such as presentations or assemblies. Appropriate measures shall be taken to communicate that only the front car park shall be used after hours by gym attendees. Adequate lighting shall be provided in this regard to suit operational uses.
Have entry and exit points been kept to a minimum?	Yes. Formalised site entry/exit is limited to Train Street.
In the case of a multi-level car park, has an appropriately light colour been used to maximise light distribution?	N/A
Facilities	

Table 3. Eurobodalla Shire 'Safer by Design' Assessment	
Have the relevant service authorities been contacted and requirements obtained?	N/A
Have public facilities been located in high activity areas with adequate lighting?	N/A. Facilities are for school use only and are not available for general public use.
Are facilities located in areas where concealment is not possible?	Building entries and entries to internal amenities have been located where passive surveillance is possible. Concealed entries, nooks and potential hiding places have been avoided.
Signage	
Have entrances, car parking and other significant uses been identified with a suitable sign?	The site entry is clearly sign posted and formalised with roundabout access from Train Street.
Is street numbering and writing of an appropriate size and colour?	It is unknown if street numbering is included on the signage, however the school is clearly identified for emergency and delivery purposes.

7 Crime Profile

The proposed development is located in the suburb of Broulee in the Eurobodalla Shire LGA.

The crime figures discussed in this section of the report are those crimes that have been recorded by NSW Police, and as such cannot be seen to necessarily be all crimes committed in the Eurobodalla Shire LGA.

Levels of reported crime are sensitive to a range of factors, including but not limited to the willingness or ability of people to report a criminal activity, the levels and nature of police activity, and actual levels of criminal activity in the area.

The consideration of recommendations included in this report are intended so that the proposed development does not become attractive to perpetrators of these types of crime.

7.1 Crime Trends

A review of the crime statistics indicates that when compared to the rest of NSW, the Eurobodalla LGA has a higher rate of crime.

Table 3 provides the breakdown of the relative crime in Eurobodalla Shire LGA when compared to NSW over a two-year period, per 100,000 population:

Table 4. Eurobodalla LGA Crime Overview – December 2020 to December 2021	
Offence Type	Eurobodalla-to-NSW incident rate ratio
Murder	0:1
Assault – domestic violence related	1.4:1
Assault – non-domestic violence	1.3:1
Sexual assault	1.2:1
Sexual touching, sexual act and other sexual offences	1.1:1
Robbery	1.8:1
Break and enter dwelling	1.3:1
Break and enter non-dwelling	2.1:1
Motor vehicle theft	1.1:1
Steal from motor vehicle	1:1
Steal from retail store	1.2:2
Other stealing offences	1:1

Table 4. Eurobodalla LGA Crime Overview – December 2020 to December 2021	
Malicious damage to property	1.7:1

Note: NSW = Ratio of 1

In terms of trends, crime rates have been lower over the past 12 months (December 2020-December 2021).

The varying crime trends reinforce CPTED principles and deterrence factors.

7.2 Crime Hotspots

While Eurobodalla Shire LGA broadly displays high crime rates, it is important to note that the location of the proposed development is not located within a designated "hotspot". The level of crime Broulee is considered generally low compared with the wider LGA and rest of NSW.

As shown in the images below, BOSCAR data for Broulee indicates that the site is not located in any hotspots. The only crimes identified within Broulee are 'theft (steal from motor vehicle) and 'malicious damage to property' however these identified hotspots are not identified near the site as mapped below.

Most crime identified are limited to suburbs Moruya (southwest of site), Moruya Heads (south of site), Mogo (northwest of site) and Woodlands (north east of site).

Hotspots indicate areas of high crime density (number of incidents per 50m x 50m) relative to crime concentrations across NSW.

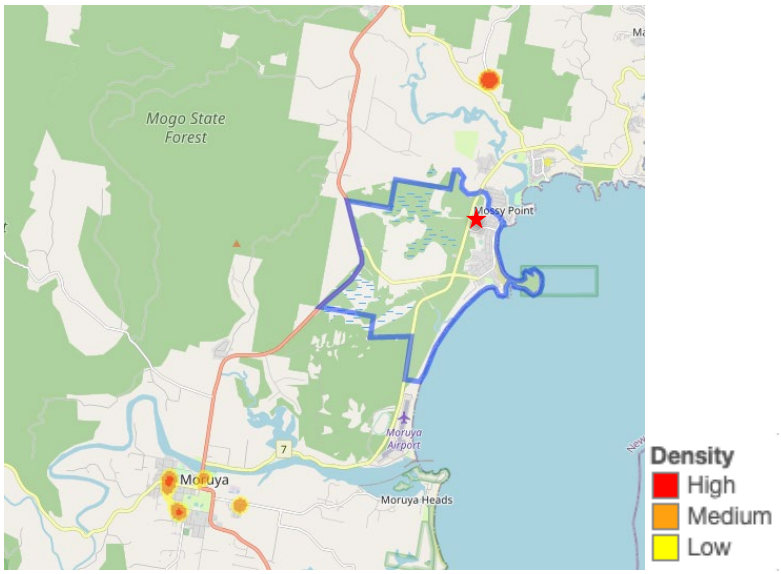

Figure 5: Incidents of domestic assault hot spot map (Source: BOSCAR NSW)

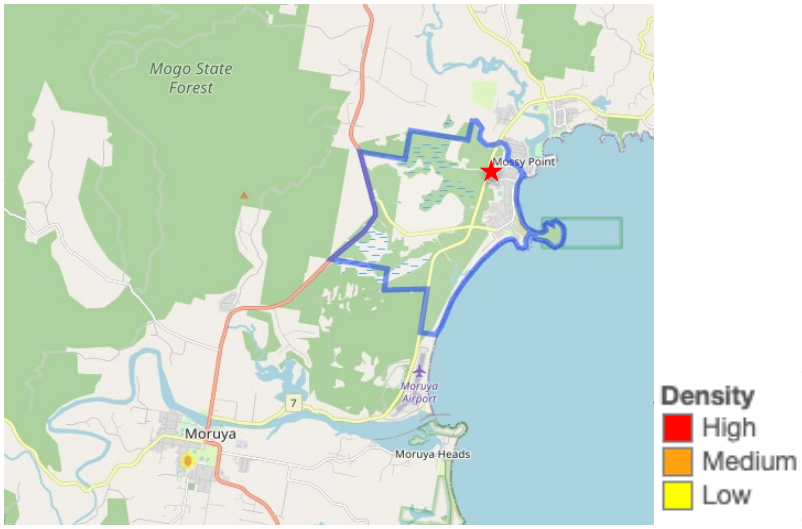

Figure 6: Incidents of non-domestic assault hot spot map (Source: BOSCAR NSW)

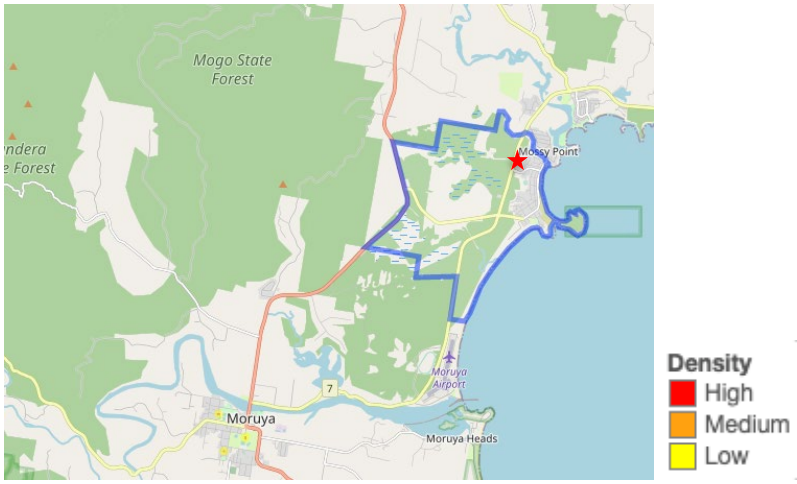

Figure 7: Incidents of robbery hot spot map (Source: BOSCAR NSW)

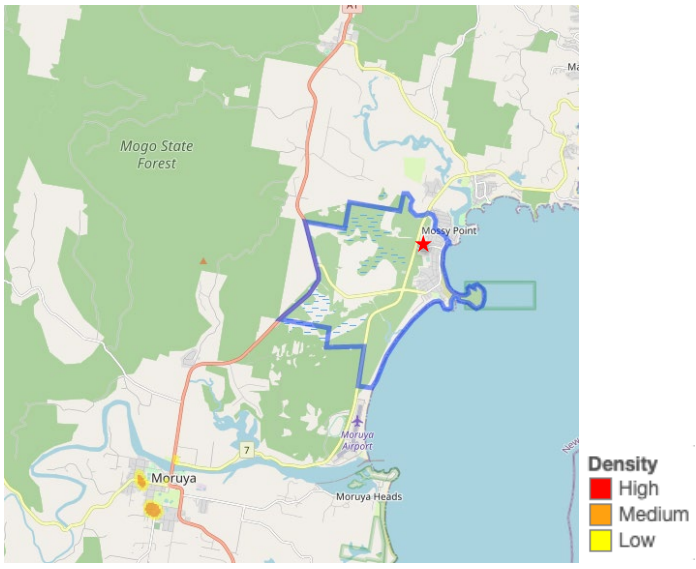

Figure 8: Incidents of theft (break and enter dwelling) hot spot map (Source: BOSCAR NSW)

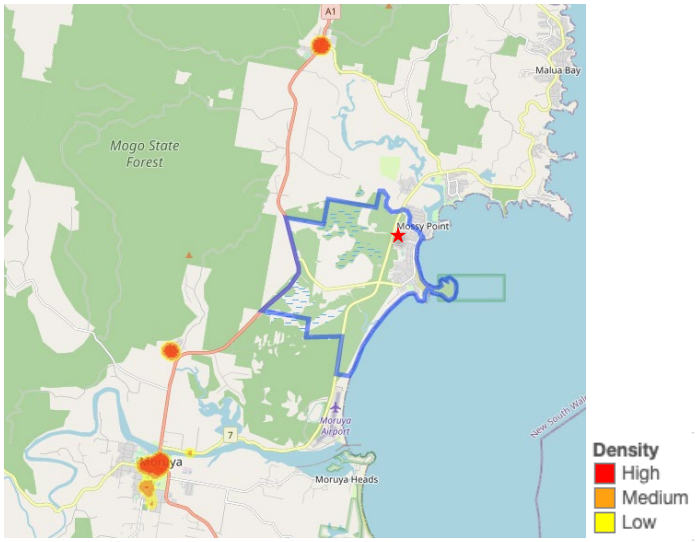

Figure 9: Incidents of theft (break and enter non-dwelling) hot spot map (*Source: BOSCAR NSW)*

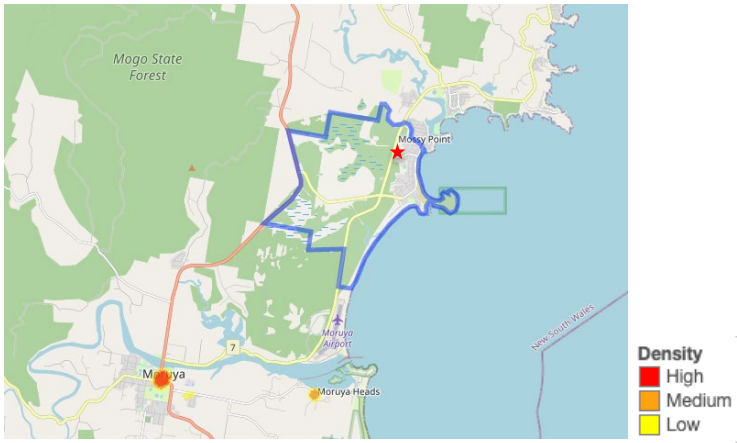

Figure 10: Incidents of theft (motor vehicle theft) hot spot map (Source: BOSCAR NSW)

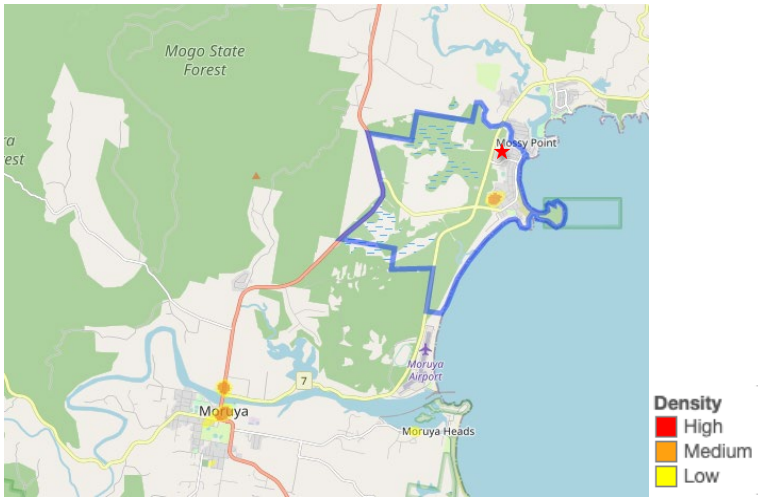

Figure 11: Incidents of theft (steal from motor vehicle) hot spot map (Source: BOSCAR NSW)

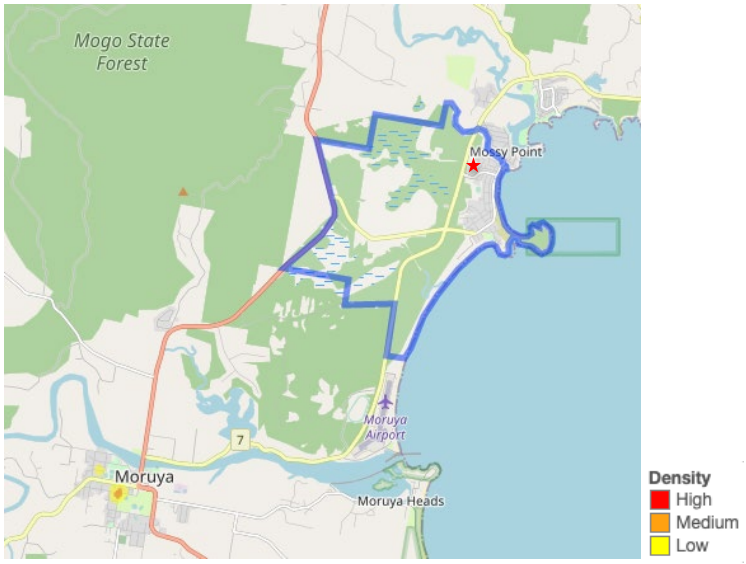

Figure 12: Incidents of theft (steal from dwelling) hot spot map (Source: BOSCAR NSW)

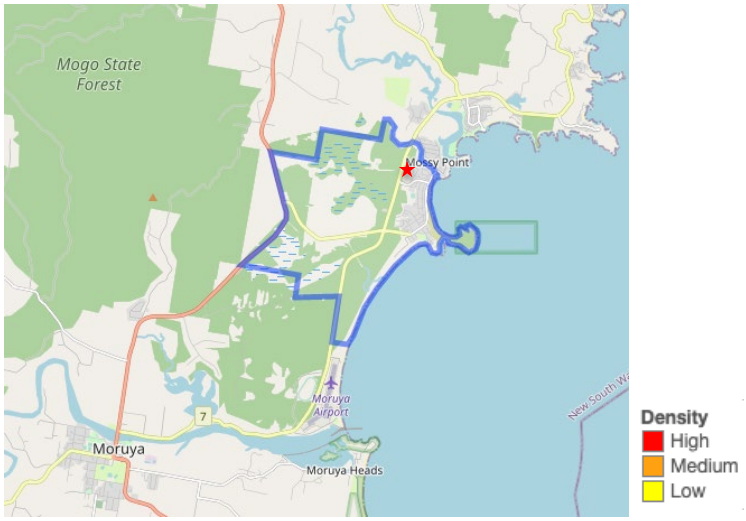

Figure 13: Incidents of theft (steal from person) hot spot map (Source: BOSCAR NSW)

Figure 14: Incidents of malicious damage to property hot spot map (Source: BOSCAR NSW)

Overall, the crime data and mapping available for the suburb of Broulee point to a **low-incident crime environment**.

8 Design Review and Recommendations

This report utilises the principles of CPTED, which are based on a situational approach to crime prevention that seeks to minimise the risks for possible crime offences to occur. This is achieved by:

- Increasing the possibility of detection, challenge and capture;
- Increasing the effort required to commit crime;
- Reducing the potential rewards of crime by minimising, removing or concealing 'crime benefits'; and
- Removing conditions that create confusion about required norms of behaviour.

Notwithstanding, this report and approach acknowledge that any design strategy cannot operate effectively in isolation and is just one element of a broader approach to a crime prevention strategy that includes social and community inputs and complementary strategies.

There are four key CPTED principles laid out in the CPTED guidelines:

- Natural surveillance;
- Access control;
- Territorial re-enforcement; and
- Space management.

The following subsections discuss these principles in greater detail in the context of the proposed development. Additionally, an assessment against the NSW Police Force CPTED Checklist is provided at **Appendix 1**.

8.1 Natural Surveillance

NSW police defines natural surveillance as follows:

> *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.*

Natural surveillance is achieved by:

- Orienting buildings, windows, entrances and exits, car parks, rubbish bins, walkways, landscape trees and shrubs, in a manner that will not obstruct opportunities for surveillance of public spaces;
- Placing persons or activities to maximise surveillance possibilities; and
- Providing lighting for night-time illumination of car parks, walkways, entrances, exits and related areas to promote a safe environment, as appropriate to those areas which will be used after hours

8.1.1 Evaluation

Our review of the plans indicates the following in relation to natural surveillance:

- The eastern and northern boundaries have natural surveillance from the adjoining residential properties.

- The main entry point to the site at Train Street also has natural surveillance from passing traffic and occupants of adjoining properties.
- Motorists passing on George Bass Drive provide passive surveillance of the western boundary.

8.1.2 Recommendations

- Maintain sightlines throughout the Campus by ensuring that landscaping or structures do not create visual obstructions;
- Ensure surveillance from the reception areas of the proposed Community Hub/Admin building and the Sports and Recreation Centre enhance the effectiveness of overall surveillance of the Campus;
- Consider regular security patrols of the Campus and adapt as required;
- Entries and the car park should be illuminated during night-time in accordance with the relevant standards;
- All areas intended to be used at night should allow for appropriate levels of visibility;
- CCTV at entries, car park and southern and eastern facades should be considered;
- If CCTV is adopted, appropriate signage shall be installed at site entries and along the fenced perimeter to alert people of CCTV use; and
- Trees should be maintained by a regular maintenance plan that keeps good sightlines to the building entries, particularly at the western boundary and north eastern area
- Where visual obstructions cannot be avoided, such as the installation of an acoustic barrier near the eastern property boundary consider the use of transparent building materials for all or part of the construction to help reduce opportunities for concealment or loitering near adjoining residential properties.

8.2 Territorial Re-Enforcement

NSW Police defines territorial re-enforcement as follows:

> *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.*

Territorial enforcement is achieved by:

- Enhancing the feeling of legitimate ownership by reinforcing existing natural surveillance and natural access control strategies with additional symbolic or social ones;
- Designing space to allow for its continued use and intended purpose; and
- Using landscaping, pavement finishes, art, screening and fences to define and outline ownership of space.

8.2.1 Evaluation

Our review of the plans indicates the following in relation to territorial re-enforcement:

- The location and orientation of the proposed Community Hub/Admin building will provide surveillance to the main entry of the Campus, provide an activity focus and improve the initial wayfinding of visitors.
- The increased level of visitation by community members particularly in respect of the proposed Sports and Recreation Centre will increase perceptions of community ownership over the semi-public space within the Campus.
- Suitable signage at entries to the site should be employed to deter unauthorised access and inappropriate loitering.

8.2.2 Recommendations

- Provide boundary and wayfinding signage to deter inappropriate access and direct pedestrian movements to desired locations.
- Provide reception services at the Community Hub/Admin building (school hours) and the Sports and Recreation Centre (school and after hours) to provide formal "guardians" to the Campus space.
- Provide school hours and site operating hours on signage at key entry points.
- If security patrol or CCTV measures are implemented, include a contact number on perimeter signage to report security concerns.

8.3 Access Control

NSW Police defines access control as follows:

> *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. 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.*

Access control is achieved by:

- Using footpaths, pavement, lighting and landscaping to clearly guide the public to and from entrances and exits; and
- Using of gates, fences, walls, landscaping and lighting to prevent or discourage public access to or from dark or unmonitored areas.

8.3.1 Evaluation

Our review of the plans indicates the following in relation to access control:

- Overall there is no change to the existing site access to the Campus.
- The revisions to the main entrance from Train Street will enhance the current levels of access control, combined with appropriate lighting and signage.
- The relatively open nature of the Campus has been found to be appropriate given the relatively lowcrime levels in the area, the College's close links with the Broulee community and the sense of community ownership that this encourages. Consideration of the 'openness' of the Campus shall be monitored into the future and additional access controls implemented as necessary.
- Appropriate signage can serve to reinforce the transition between the public road and the College Campus.

8.3.2 Recommendations

- Community Hub/Admin building and the Sports and Recreation Centre should be locked after school hours and only be accessible outside of these hours by dedicated staff / reception.
- If to be used in hours of low natural light, provide lighting in accordance with Australian Standards for pedestrian routes and carparking areas where these are intended to be used after daylight hours with particular attention to the following areas:
    - Main pedestrian routes that will be in use at night, including the path to the Sports and Recreation Centre;
    - All car parking areas and the pedestrian routes thereto;
    - All entrances to the Campus from the adjoining public roads.
- Ensure that lighting does not spill to adjoining residential premises or adversely affect fauna that is active at night.
- Consider the implementation of CCTV surveillance on the Campus.
- Fire exit doors should be fitted with measures to restrict unauthorised access from the outside.
- All areas should be fitted with doors that comply with relevant Australian Standards.
- Maintain fencing, gating or other access control measures as required, in particular to prevent unauthorised vehicle access to the Campus grounds.
- Monitor the effectiveness of current low-rise site fencing and consider upgrades in future if trespassing becomes an area of concern.
- Where climbable building elements are proposed which could potentially provide access to upper storeys or roof areas (such as downpipes fixed to solid walls), landscaping treatments such as densely planted low rise garden beds, are recommended at ground level to deter access
- Where the acoustic barrier is proposed near the eastern property boundary, consider the use of transparent building materials for all or part of the construction to help reduce opportunities for concealment or loitering near adjoining residential properties. Signage shall be installed which confirms this area is out of bounds for student use. Consideration should be given for low rise planting adjacent to out of bounds areas (where possible with consideration for heritage constraints) to reinforce that it is not a thoroughfare area.

8.4 Space/Activity Management

NSW Police defines space/activity management as follows:

> *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. Places that are infrequently used are commonly abused. There is a high correlation between urban decay, fear of crime and avoidance behaviour.*

Space/activity management is achieved by:

- Ensuring premises are well maintained and cared for; and

- Ensuring rapid repair of vandalism and replacement of lighting.

8.4.1 Evaluation

Our review of the plans indicates the following in relation to space/activity management:

- The Community Hub/Admin building and the Sports and Recreation Centre are designed for specific purposes and will be owned and maintained by the Campus; and
- It is anticipated that a management plan/strategy will be put into place to ensure proper maintenance of buildings.

8.4.2 Recommendations

- Robust, graffiti-resistance materials shall be used in accordance with the proposed schedule of finishes.
- Graffiti management measures should be incorporated into the maintenance plan/strategy for the building. Research has shown that the most effective strategy for reducing graffiti attacks is the quick removal of graffiti within a 48-hour period.
- The building maintenance plan/strategy should provide information within the buildings on how to report maintenance or vandalism.
- The building maintenance plan/strategy should also maintain landscaping to ensure the site displays strong ownership.
- The design of buildings should incorporate a robust material palette, particularly for outdoor spaces in order to reduce susceptibility to vandalism and wear and tear.

9 Conclusion

This CPTED report supports an DA submitted to Council for alterations and additions to the existing St Peter's Anglican College at 61 Train Street, Broulee.

The proposed development has been evaluated in the context of the four key principles of CPTED and relevant data from BOSCAR.

Section 8 of this report includes an assessment of the proposed design and recommendations which will enable the design and ongoing use of the development to align with those CPTED principles to reduce opportunities for crime.

The recommendations identified are minor in scope and can be achieved by means of conditions of consent or otherwise detailed in the Construction Certificate drawings.

Given the above, we conclude that the development is acceptable from a crime risk perspective.

Appendix 1 – NSW Police CPTED Guideline Assessment

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NSW Police CPTED Guideline Assessment		
Standard	Provisions	Compliance
Natural Surveillance	Openings in buildings are located and designed to overlook public places to maximize casual surveillance.	Entry points are visible and clearly distinguishable.
	The main entry to a building should face the street.	The main entry pathway through the campus is visible from Train Street.
	An external entry path and the foyer to a building must be direct to avoid potential hiding places.	Able to be implemented. It is recommended that future paths provide no opportunity for potential hiding places and direct line of sight into the building.
	Entry lobby areas to and from car parking areas should be transparent allowing viewing into and from these areas.	Entrances to carparking areas are clearly defined and transparent.
	Landscaping must not conceal the front door to a building when viewed from the street	The proposed landscaping design will not unnecessarily conceal building entries when viewed from the street.
	Pedestrian access should be well lit and maximize sight lines.	Able to be implemented. It is recommended that future pedestrian access paths are direct and provide sight lines into the development and appropriate lighting, if to be used after daylight hours.
	Landscaping should not inhibit sight lines.	The proposed landscaping design will not unnecessarily inhibit site lines. Landscaping shall be maintained to not inhibit site lines or conceal building entries.
	ATM design and location is within direct view of pedestrian paths so that they can be overlooked from vantage points.	No ATMs are proposed.

NSW Police CPTED Guideline Assessment		
Standard	Provisions	Compliance
	The street number of a building must be visible from the street and made of a reflective material to allow visitors and emergency vehicles to easily identify the location of the building.	Able to be implemented, if required.
	Landscaping should be designed to maximise sight lines.	Landscaping proposes low ground covers and canopy trees, maintaining sight lines.
Measures /security devices	All windows and doors on the ground floor must be made of toughened glass to reduce the opportunities for 'smash and grab' and 'break and enter' offences.	Able to be implemented. Robust materials shall be used which are suitable for a school environment.
	A security alarm system must be installed in a building.	Able to be implemented. The implementation of CCTV and appropriate alarm systems shall be considered as part of the ongoing management of the site.
	Unless impracticable, access to an outdoor car park must be closed to the public outside of business hours via a lockable gate.	Car park entry gates are not currently proposed, however could be implemented in future as required.
	CCTV system must cover all high-risk areas and including all entry areas.	Able to be implemented. The implementation of CCTV and appropriate alarm systems shall be considered as part of the ongoing management of the site.
Access control	Loading docks in the vicinity of main entry areas are secured outside of business hours.	N/A. The nature of the development does not require a formalised loading dock area. An open turning circle is available for deliveries and loading as required.
	Access to a loading dock, or other restricted area in a	N/A.

NSW Police CPTED Guideline Assessment		
Standard	Provisions	Compliance
	building must only be accessible to tenants via a security door, intercom, code or other mechanism.	
	Clear signage should be erected indicating loading docks and other areas which cannot be accessed by the general public.	N/A.
Territoriality/ownership	Site planning provides a clear definition of territory and ownership of all private, semi-public and public places.	The site and design make a clear distinction between private and public areas. The entry is formalised which clearly identifies entry to the school grounds.
Lighting	Both natural and artificial lighting is used to reduce poorly lit or dark areas and therefore deterring crime and vandalism.	Natural and artificial light will improve visibility of the development, the semi-public spaces and the street.
	Lighting must be provided to the following areas of a building to promote safety and security and night; A – an external entry path, foyer, driveway and car park to a building b- shopfront. This may be in the form of motion sensitive lighting or timer lighting c – the underside of an awning.	Able to be implemented – refer to recommendations in Part 8.
	Lift access to a car park that are intended for night use must be well lit using a vandal resistant, high mounted light fixture.	N/A.

NSW Police CPTED Guideline Assessment		
Standard	Provisions	Compliance
	The lighting in a car park must confirm to Australian Standards 1158.1, 2890.1.	Able to be implemented – refer to recommendations in Part 8.
	The use of lighting fixtures, and vandal resistant, high mounted light fixtures, which are less susceptible to damage in the car park and laneway areas.	Able to be implemented – refer to recommendations in Part 8.
	Car parking areas should be painted in light colours which will increase levels of illumination.	Able to be implemented – refer to recommendations in Part 8.
Vandalism and graffiti	Development minimises blank walls along all street frontages.	The layout of the campus includes central buildings and internal access paths, minimising opportunities for blank walls to public street frontages.