



HARRIS CRIME PREVENTION SERVICES

crime risk reviews | security master planning | designing out crime | 'safe place' management
www.harriscrimeprevention.com.au t: (02) 9804 8771 Security Master Licence 407778164

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

FINAL REPORT

in relation to the

DA/2025/52 - Concept Development Application for a
Manufactured Housing (Home) Estate -177/874171, 55/874170
559 Anambah Road GOSFORTH NSW 2320

for

Mid North Coast Projects

on behalf of

Third.I Group

November 2025

Leon Harris: Dip. Sec. Studies, Cert IV Sec. (Risk Mgt), Cert IV (Work Health and Safety)
Don Robertson: BA (Crim.), MA (Ed.), Grad. Dip (Environ. Studies), PhD (Aviation Sec.)

Commercial-In-Confidence

TO BE RELEASED AS CONTROLLED COPIES ONLY

Unauthorised copying prohibited

Table of Contents

THE REPORT	3
1 Report Structure	3
2 Engagement and Development Overview	5
3 Scope, Outcomes, Stakeholders and Informing Instruments-Standards.....	6
4 CPTED – Aim, Definitions and Principles	7
5 Relevance of CPTED Principles to Compliance Requirements (Section 9)	8
6 The Site and Future Crime Risks to Residential Occupants.....	8
7 Subdivision Characteristics and Proposed Communal Facilities	10
8 Application of CPTED Principles to the Subdivision's Masterplan	11
9 Informing Legislation, Policy and/or Planning Instruments: Compliance	16
10 OVERALL CPTED ASSESSMENT SUMMARY	18
11 References	20
12 Supporting Appendices 1 and 2.....	21

**Crime Prevention Through Environmental Design (CPTED) Consultancy
in relation to the DA/2025/52 - Concept Development Application for a
Manufactured Housing (Home) Estate -177/874171, 55/874170
559 Anambah Road Gosforth NSW**

THE REPORT

1 Report Structure

Key Conclusions and Recommendations Summary

The report is structured as:

Section 1	report structure
Section 2	engagement and development overview
Section 3	scope, stakeholders and informing instruments
Section 4	CPTED aim, principles and the Harris approach
Section 5	relevance of CPTED principles to compliance requirements
Section 6	the site and future crime risks to residential occupants
Section 7	subdivision characteristics and proposed communal facilities
Section 8	application of CPTED principles to the subdivision's masterplan
Section 9	compliance with legislation, regulation, planning and/or policy instrument
Section 10	overall consultancy summary
Section 11	references, and
Section 12	supporting Appendices 1 and 2.

Key Conclusions and Recommendations Summary - extracted from the report's assessment and commentary on the application of CPTED Principles

Harris Crime Prevention Services' Consultants have reviewed and assessed the concept-masterplan drawings and associated documentation for the proposed residential subdivision at 559 Anambah Road Gosforth NSW. Our key conclusions and recommendations summary of CPTED applications are outlined hereunder.

Principle 1: Territory Definitions, Purpose and Spatial Separation

The masterplan clearly defines street and proposed manufactured homes dwelling site layouts, the proposed communal spaces, pocket park locations, club house and associated active recreational facilities, entry and exit points. Spatial separation and purposes are clearly defined.

Staged construction will further outline, for example, securing (managing) community facility waste and securing utilities infrastructure. In summary, the development's footprint as presented, ensures whole-of-site definitional clarity and overall legibility. CPTED 'looks for' this design element clarity.

Principle 2: Natural Surveillance

The proposed evolution of the MHE's design should facilitate (specify) pre-occupancy (construction) surveillance and post-occupancy owner-occupier surveillance.

Intra-site pre-occupancy surveillance will rely on project management and construction team cooperation to observe any unusual or suspicious activity, notwithstanding each trade's primary (construction) focus.

Resident surveillance will be prompted by an occupancy stewardship, promoted by driveway, pathway and streetscape designs, facilitating adequate sightlines. Natural surveillance opportunities are also provided at and around design elements of passive and active recreation facilities.

Principle 3: Access Control

Throughout construction, the developer/project manager must recognise the need to ensure authorisation for all design-and-construct contractors and delivery drivers accessing the site.

Post construction access control to community buildings and associated active recreational zones will be the combined access responsibility of residents and management of those communal facilities.

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

Intra-site street and pathway lighting will be designed in accordance with Standard 1158 and Ausgrid's Standard NS119. Communal (open) space, pocket park, garden and recreation facilities lighting should be determined by 'illumination' wayfinding and social gathering needs.

All (post construction) wayfinding lighting should be specified at 4000 Kelvin. Bollard lighting should be avoided throughout the subdivision.

Landscaping elements throughout the subdivision, including at gardens, pocket parks and all social gathering spaces should 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, we recommend CCTV coverage of vulnerable buildings and equipment, monitoring (storing) all pedestrian-vehicle movement. Contractor ID should be mandatory for all trade disciplines.

A whole-of-site robust security fence and gates must deter and/or prevent unauthorised access during construction stages. 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.

We note the intention to 'fence' the subdivision at relevant boundaries and to provide appropriate access control fencing at, and around, community buildings and associated facilities.

Consideration should be given to installing video surveillance at and around the club houses, the BBQ, swimming pool, tennis court, men's shed and bowling green spaces to support residents' stewardship (welcoming-and-safe-place) objectives.

We have noted (9.5 above) the design team's intention to incorporate of CPTED principles to comply with the State Government's 'social impact' and 'public interest' requirements and to also comply with Maitland City Council's Development Control Plan requirements.

In our professional opinion, there is every indication that relevant CPTED elements will be incorporated as the development progresses from masterplan to (staged) design development-detail.

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.

2 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 Mid North Coast Projects in relation to a proposed Manufactured Housing (Home) Estate (MHE, subdivision or development) at 559 Anambah Road Gosforth NSW. This proposed subdivision abuts a separate subdivision proposal.

The proposed staged subdivision 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 Concept Proposal is for the establishment of a Manufactured Home Estate (MHE) accommodating approximately 263 dwelling sites (subject to further studies and subsequent detailed Development Applications), community open spaces and associated community facilities, internal road network, services, and drainage reserves."

*The Concept Masterplan is proposed to be delivered in two stages. In accordance with Section 4.22(2) of the EP&A Act, this Concept Development Application includes a detailed assessment of Stage 1 of the Development. All stages subsequent to Stage 1 will be the subject of future development applications. Stage 1 of the Concept Proposal is shown in **Image 1** (below) and will include the following elements:*

- (i) *Site preparation works including the removal of existing vegetation, decommissioning of farm dams and bulk earthworks to achieve appropriate site and road grading*
- (ii) *Construction of lead in road infrastructure and services including main entry/exit to Anambah Road and connections to River Road flood egress/access road*
- (iii) *Construction of a 291 site Manufactured Home Estate, featuring:*
 - *communal open spaces and community facilities*
 - *internal road network, visitor parking and shared pathway network*
 - *three (3) drainage reserves*
 - *caravan parking area*
 - *landscaping.” (Barr Planning)*

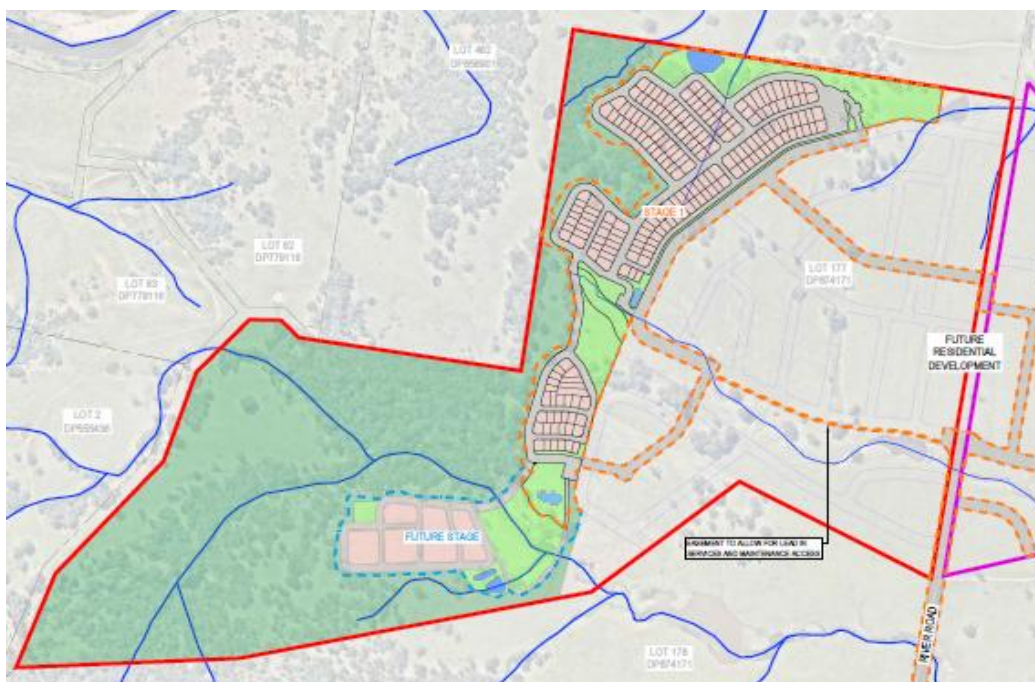


Image 1 proposed subdivision for proposed manufactured home estate – Maker

3 Scope, Outcomes, Stakeholders and Informing Instruments-Standards

3.1 Consultancy Scope

The scope has addressed crime risk and crime prevention (CPTED) solutions, to ensure 'welcoming-and-safe-place outcomes' for the residents who will eventually occupy the subdivision.

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'.

Our consultants have:

- (i) clarified with the client the CPTED-related elements, as those elements support the crime prevention (security) objectives of the subdivision-development
- (ii) identified CPTED applications regarding the (foreshadowed) safe day-night inter and intra site (staged) connectivity between the proposed development's residential footprint, streetscapes, and communal 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, and (foreshadowed application) for natural and technical (CCTV) surveillance (as part of future design-development), 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) Mid North Coast Projects
- (ii) Third.I Group
- (iii) future residents of manufactured homes, guests and visitors
- (iv) (future) maintenance contractors and emergency personnel
- (v) Maitland City Council
- (vi) 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 9**.

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) ISO22341-2:2025, *Security and resilience — Protective Security — Part 2: Guidelines for crime prevention through environmental design for residential facilities*

The report has two (supporting) appendices:

- Appendix 1 NSW Bureau of Crime Statistics and Research (BOCSAR) - reported crime statistics for Gosforth over five years, July 2020 to June 2025
- Appendix 2 The Risk Management Standard AS/ISO31000:2018

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

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.

4.1 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 Relevance of CPTED Principles to Compliance Requirements (Section 9)

The principles should be applied to the masterplan documentation to satisfy the requirements of the State and local governments, with reference also to the NSW Police.

We understand that these requirements will be further addressed throughout future planning and design documentation. However, they are foreshadowed here in terms of the subdivision's proposals.

Section 9 expands on the compliance requirements.

5.1 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).

5.2 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.

5.3 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.

6 The Site and Future Crime Risks to Residential Occupants

6.1 The Current Site

The site proposes staged Manufactured Housing Estate (MHE), of which this proposal includes the first stage and the conceptual proposal for the remainder of the development which will be the subject of subsequent detailed Development Applications. The 'address' for this proposal is 559 Anambah Road Gosforth. The MHE abuts a proposed residential subdivision forming part of The Anambah Urban Release Area and is also surrounded by neighbouring rural properties.



Image 2 rural no 559 'address' and current entry to the yet-to-be-developed lots - Harris



Image 3 typical topography of the proposed residential MHE - Harris

6.2 Crime Risk Scenarios

Potential crime risks to the eventually occupied subdivision will reflect those of similar semi-rural and urban developments.

The crime risk information obtained from the local (Maitland) Crime Prevention Officer in relation to the nearest urban context (Rutherford) has no immediate 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.

Crime risks associated with residential occupancy may be broadly categorised as:

- (i) Property offences – damage to, and theft of, personal and community-owned assets
- (ii) Person offences – physical or sexual assaults against occupants, guests or visitors

These broad categories are detailed in local police reports and in the statistical data obtainable from the NSW Bureau of Crime Statistics and Research (BOCSAR).

The way subdivision lots are proposed, the streetscapes, the community facilities and associated green space will 'inform' the crime risk potential. CPTED 'intervention' at the subdivision stages aims to minimise any negative impacts post construction and occupancy.

6.3 Potential Crime Risks and 'Levels' on Occupancy

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**).

This (pre-occupancy) assessment is based on the understanding of an 'enclosed' community, appropriately boundary fenced and requiring 'permissible' pedestrian and vehicle access. The assessment is also predicated on the fact of communal (not public) gardens, pocket parks and (fenced) recreational facilities. There is possibility of criminality occurring during construction stages.

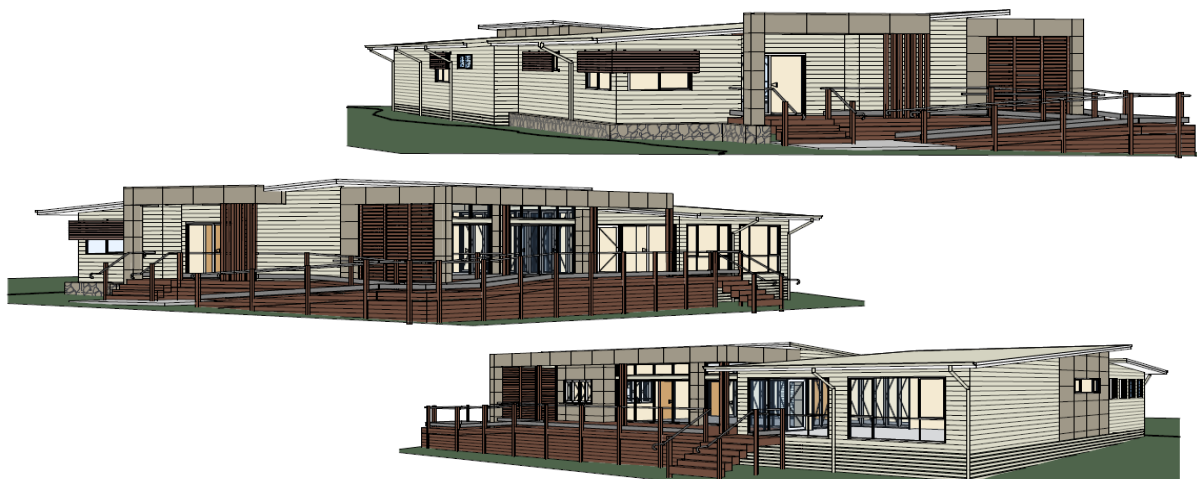
The mostly predictable crime categories likely to 'target' the development during and post staged construction are:

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

7 Subdivision Characteristics and Proposed Communal Facilities

The 'manufactured homes' subdivision has the following passive and active recreational facilities – a community building, club houses, swimming pool, caravan park area, tennis court, bowling green gardens and social gathering spaces. Facilities will be disability inclusive (Purple Apple Access report).

Each of the facilities and accompanying landscaping (Plans A to G) will be subject to design development documentation, flagging attention to CPTED-addressed crime risk mitigation, notwithstanding the 'closed' residential community development proposal.



Images 4 - 6 indicative community building perspectives - Parkwood Modular Buildings

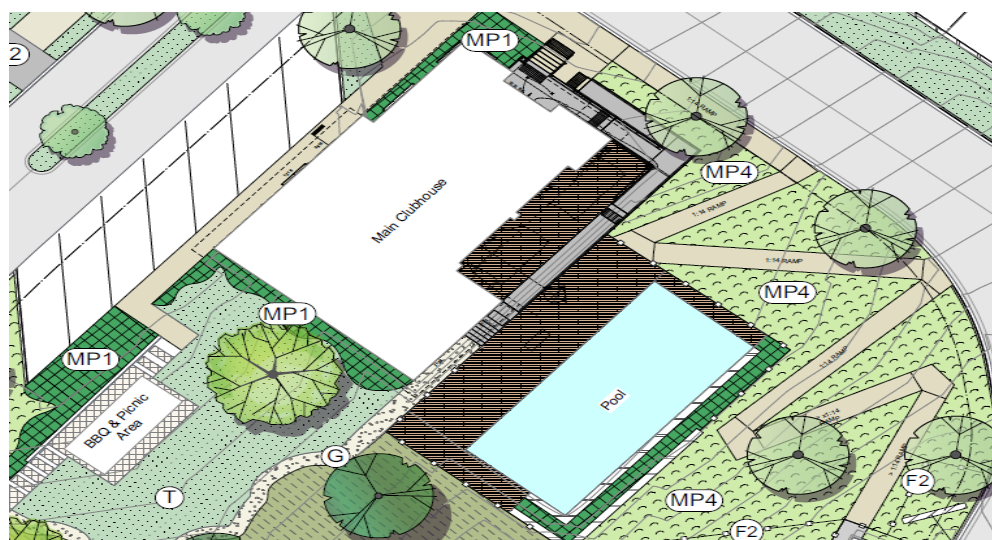


Image 7 proposed part community facilities – moir studio , Landscape Plan D

8 Application of CPTED Principles to the Subdivision's Masterplan

8.1 CPTED Principle 1

Territorial Definition: clarity about spatial identity, separation, boundaries and purposes

Harris general explanation and advisory

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; (for example, design of mixed-use spaces including, building entrances, public, communal, sporting, retail, commercial, residential, industrial, social gathering, wayfinding and vehicle access spaces).

When spaces become clearly defined collective 'places', form and function are easily identified. This removes confusion of purpose, enhances safe circulation and maximises alertness to any surrounding risks or threats.

8.1.1 Application – Overall Site Definitions

The MHE's concept-masterplan clearly divides into Manufactured Home Sites, internal streets, access and egress points, social gathering, passive and active recreational zones. Road reserves, water course and riparian corridors, potential detention and waste management zones are proposed. A share-way is proposed to circle the perimeter, assisting to clarify the subdivision's total footprint.

Layout drawings define wayfinding to the various subdivision zones. There is no confusion as to spatial separation or purposes and the intra-connectivity of elements-facilitates promoted safe wayfinding attractiveness to passive and active communal spaces. The subdivision promotes walkability and is cognisant of disability inclusion, (Purple Access Report). General legibility and permeability prevail in the initial drawings.

8.1.2 Application – (Manufactured) Housing Sites

The objective of proposed dwelling designs is to ensure a reality of 'welcoming-and-safe-place' for residents, their guests and visitors. As with any similar (new) residential planning, designs and lot layouts should encourage privacy and, from a CPTED perspective, a genuine sense of security.

BARR Planning notes: "All dwelling sites are accessed via internal private roads. There are multiple dwelling types that can be contained within the MHE sites ranging from 2 to 3 bedroom options, with 1 to 2 Garages and 1 to 2 bathrooms. Detailed dwelling design does not form part of this application – following construction of the dwelling sites, manufactured homes will be installed in accordance with the requirements of Part 2, Division 4 of the Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2021 (LG Regulation)."

8.1.3 Application – Community (Communal) Definitions

The masterplan envisages a variety of passive and active community facilities including club houses, a swimming pool, lawn bowling green, a future men's shed, picnic areas and social gathering spaces within pocket-style parks.

Each of these proposals are clearly defined in the masterplan and, from a CPTED viewpoint, they provide safe intra-site links throughout the footprint.

8.1.4 Application – Utilities and Waste Management

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

There will be a comprehensive waste management plan. This will form part of defined water courses and/or 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.

Waste management at the communal facilities and at park zones will require appropriate management to avoid any contents 'tampering'. We understand that for residents, there will be dedicated waste bins between parking bays.

8.2 CPTED Principle 2 Natural surveillance – architecture facilitating strong observational sightlines

Harris general explanation and advisory

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-latitudinal fields. The aim is to know who or what is within a surveillance field and to observe specific unlawful action or intent.

8.2.1 Application – Pre and Post Occupancy Intra-Site Surveillance

Construction management will prove an intra-site natural surveillance challenge. Trade and other contractors will not be focussed on 'observing'. Work, deliveries and schedules will be the priority. However, contractor orientation should include the need, where possible, to observe and report any behaviour that could be construed as potential security breaches and/or criminal activity.

Maximising intra-site surveillance for residents through dwelling design is a critical 'safe place' objective. The (rolling) topography of the subdivision and the overall design foreshadows strong post-construction sightlines along internal roads, at proposed park and garden zones and at the various community facilities. Walkable and shared pathways (including around the perimeter) will facilitate informal observation opportunities.

The lot layout, street setbacks, dwelling designs and between dwellings should aim for maximum natural surveillance while respecting privacy. Opportunities will be 'promoted' by simple driveway and pathway designs, encouraging safe circulation along internal roads (streets). Minimising (and hopefully eliminating) concealment and entrapment spaces or blind corners throughout the site during design development is an important aim, thereby maximising day-night sightlines.

8.2.2 Application – Communal Spaces (Zones)

The outdoor communal spaces, for example tennis courts, bowling green, picnic, swimming pool and future parks and gardens will have a legibility which should facilitate in-space and surrounding space surveillance. Interconnecting pathways and share-ways will provide complementary proximate and distant sightlines.

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.

8.3 CPTED Principle 3

Access Control: who goes where, when and why

The Harris (generic) explanation and advisory

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 electronic access control systems (eacs) and (c) able to prevent and/or identify unauthorised access.

8.3.1 Application – Access Roads

The main access and egress road into the subdivision is via Anambah Road. There are internal roads with vehicle parking within MHE sites, on street and at the designated passive and active communal zones. As mentioned in **Principle 1**, these arrangements present no definitional confusion, rather the opposite, promoting both walkability and vehicle 'wayfinding' throughout the subdivision.

8.3.2 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 should be considered for all trade disciplines and deliveries. (**Refer Principle 5**)

8.3.3 Application – Access to Completed Site and Dwellings

A feature of the masterplan is to create a semi-private (access controlled) subdivision. There will also be intra-site fencing around indoor, and some outdoor, recreational spaces as 'back-up' security.

The proposed manufactured home designs should ensure that front door and/or garage entry will be controlled by dwelling owner-occupiers. Preventing potential unauthorised access to dwellings through the application of video cameras, mechanical and/or video-audio locking systems will become the responsibility of owner-occupiers. Where carports are permitted (added) in subsequent planning, they could benefit from camera surveillance.

8.3.4 Application – Mailbox Security

One of the concerns of police (in their CPTED checklist) is the increasing likelihood of mailbox theft in suburban streets, mainly for 'stolen identity' purposes. This is particularly so with newly completed residential developments. In this case, tampering and/or theft from mailboxes is less likely due to the subdivision's restricted access emphasis. That said, residents should opt for mailbox designs that are robust and lockable.

8.3.5 Application – Post-Construction Contractor Access

From time to time, contractors will need to enter dwellings and community facilities. As with all who seek such access, it is important that residents and facilities managers challenge and verify at all times contractor identity.

8.4 CPTED Principle 4

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

Harris general explanation and advisory

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).

External (and where appropriate Internal) Lighting should reflect 'purpose' consistency: wayfinding, destination, social gathering and decorative-aesthetic. Each requires differing luminaire styles, lighting types, spread, throw, spill, wash and lux levels, to accord with lighting Standards and architectural briefs.

CPTED lighting applications can (should) often exceed those Standards and briefs so as to highlight spaces and circulation - activation 'corridors'.

Differential lighting should avoid cross-over colour (temperature) clashes to enhance surveillance identification of property and people. All external lighting should optimise sightline legibility, to facilitate proximate-distant wayfinding and destination confidence.

Landscaping should combine aesthetics and purpose with an intent to prevent concealment or entrapment.

Signage supports wayfinding and destination certainty, access limiting (controlling), warning and emergency awareness. It should have day-night visual impact.

8.4.1 Application – External Lighting Consistency, Colour and 'Corridors'

Appropriate external lighting critical to illuminate internal streets, the perimeter share-way, pathways leading to indoor and outdoor active recreation facilities, picnic areas, future men's shed and informal social gathering spaces. The aim is to provide high and focussed lux level 'support' for night-time intra-site wayfinding to all those designated points and to each dwelling.

As we consistently mention in our urban development reports, the idea is to create consistent lighting 'corridors' across all subdivision zones, maximising wayfinding certainty and safety. Illumination consistency should eliminate shadows or gaps, ensuring strong beam angles, throw spill and wash.

Should public toilets be included at picnic areas, pocket parks or other social gathering-garden spaces, solar lighting should be considered with battery back-up capability.

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

(From a CPTED perspective it is essential to present consistent lighting colour characteristics. 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.)

8.4.2 Application – Landscaping

BARR Planning notes: "*Landscaping of the site is proposed as per the Landscape Plan prepared by Moir Studio and submitted with the application. The proposed MHE includes high quality landscaping and comprising of extensive treatment to the proposed MHE entrance, clubhouse/community facility precincts, and basin planting surrounding the drainage reserves. Extensive street tree planting is also proposed throughout the estate.*"

Moir's landscape masterplan designates each of the communal facilities and associated open spaces, including parking bays and extensive pathways. Their drawings are labelled Plans A to G. The following concept image is an indicative preferred Plan A design.

It is important to specify robust communal seating and to ensure that all pathways are free from plantings that could conceal or entrap.



Image 8 Plan A concept 'safe space' design – moir studio (see also Plan D page 9)

8.4.3 Application – Signage

Wayfinding and destination signage is an important element. Signage to community facilities and associated open spaces should be easily 'read', should be backlit and should be disability inclusive.

8.5 CPTED Principle 5

Target Hardening: adding specific and robust architecture and technology

Harris general explanation and advisory

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.

Design measures aim to increase the efforts intending offenders must expend attempting to damage property and/or harm or injure people.

Target hardening can apply additional physical, mechanical, structural and electronic treatments to deny or limit access. Electronic alarms or surveillance cameras are the more common target hardening measures. However, the Principle's design goal is to avoid place 'fortressing'.

8.5.1 Application – Site Security Throughout Construction

The MHE is security-vulnerable throughout construction, 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 (CCTV) surveillance 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.

8.5.2 Application – On-Site Temporary Structures During Construction

Ideally, 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’.

8.5.3 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 (8.3.4) our earlier recommendation regarding the robust structure and design of mailboxes to prevent damage or mail theft.

8.5.4 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.

9 Informing Legislation, Policy and/or Planning Instruments: Compliance

9.1 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.

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.

9.2 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.

9.3 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.

9.4 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 ISO22341-2:2025 Security and resilience Protective security — Part 2: Guidelines for crime prevention through environmental design for residential facilities

9.5 Instrument Compliance Conclusions and/or Recommendations

Harris Crime Prevention Services’ consultants conclude:

- (i) that reviewed and assessed concept-masterplan layout drawings for the proposed residential subdivision at 559 Anambah Road Gosforth NSW, will consider necessary strategies for mitigating potential construction and occupancy anti-social and criminal behaviour risks by applying CPTED principles, to accord with State and local instrument compliance.
- (ii) that application of CPTED principles complies with 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.
- (iii) that application of CPTED principles also complies with the requirements of Maitland City Council’s Development Control Plan, 2011, Section C.12
- (iv) that the NSW Police Crime Prevention (Safer-By-Design) Checklist – Revision 2020, has been referenced by Harris to ensure CPTED solutions meet relevant checklist requirements.

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

10 OVERALL CPTED ASSESSMENT SUMMARY

(Application of CPTED Principles to Pre and Post Subdivision Occupancy)

Harris Crime Prevention Services' Consultants have reviewed and assessed the concept-masterplan drawings and associated documentation for the proposed residential subdivision at 559 Anambah Road Gosforth NSW. Our key conclusions and recommendations summary of CPTED applications are outlined hereunder.

Principle 1: Territory Definitions, Purpose and Spatial Separation

The masterplan clearly defines street and proposed manufactured homes dwelling site layouts, the proposed communal spaces, pocket park locations, club house and associated active recreational facilities, entry and exit points. Spatial separation and purposes are clearly defined.

Staged construction will further outline, for example, securing (managing) community facility waste and securing utilities infrastructure. In summary, the development's footprint as presented, ensures whole-of-site definitional clarity and overall legibility. CPTED 'looks for' this design element clarity.

Principle 2: Natural Surveillance

The proposed evolution of the MHE's design should facilitate (specify) pre-occupancy (construction) surveillance and post-occupancy owner-occupier surveillance.

Intra-site pre-occupancy surveillance will rely on project management and construction team cooperation to observe any unusual or suspicious activity, notwithstanding each trade's primary (construction) focus.

Resident surveillance will be prompted by an occupancy stewardship, promoted by driveway, pathway and streetscape designs, facilitating adequate sightlines. Natural surveillance opportunities are also provided at and around design elements of passive and active recreation facilities.

Principle 3: Access Control

Throughout construction, the developer/project manager must recognise the need to ensure authorisation for all design-and-construct contractors and delivery drivers accessing the site.

Post construction access control to community buildings and associated active recreational zones will be the combined access responsibility of residents and management of those communal facilities.

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

Intra-site street and pathway lighting will be designed in accordance with Standard 1158 and Ausgrid's Standard NS119. Communal (open) space, pocket park, garden and recreation facilities lighting should be determined by 'illumination' wayfinding and social gathering needs.

All (post construction) wayfinding lighting should be specified at 4000 Kelvin. Bollard lighting should be avoided throughout the subdivision.

Landscaping elements throughout the subdivision, including at gardens, pocket parks and all social gathering spaces should 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, we recommend CCTV coverage of vulnerable buildings and equipment, monitoring (storing) all pedestrian-vehicle movement. Contractor ID should be mandatory for all trade disciplines.

A whole-of-site robust security fence and gates must deter and/or prevent unauthorised access during construction stages. 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.

We note the intention to 'fence' the subdivision at relevant boundaries and to provide appropriate access control fencing at, and around, community buildings and associated facilities.

Consideration should be given to installing video surveillance at and around the club houses, the BBQ, swimming pool, tennis court, men's shed and bowling green spaces to support residents' stewardship (welcoming-and-safe-place) objectives.

We have noted (**9.5 above**) the design team's intention to incorporate of CPTED principles to comply with the State Government's 'social impact' and 'public interest' requirements and to also comply with Maitland City Council's Development Control Plan requirements.

In our professional opinion, there is every indication that relevant CPTED elements will be incorporated as the development progresses from masterplan to (staged) design development-detail.

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.

11 References

Barr Property and Planning Pty Ltd, Statement of Environmental Effects, Concept Development Application and Stage 1 Development Application 559 Anambah Road, Gosforth, 23rd January 2025

Glendale Homes Pty Ltd, Proposed Club House (Community Centre) drawings, Issue A, 5th February 2025

MAKER Consulting Services, Concept and Stage 1 Development Application Sketches, Revision 2, 23rd October 2025

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

Moir Studio, Landscape and Visual Impact Assessment, Revision C, 13th December 2024

MRA Consulting Group, Waste Management Plan, Submission to Third.i Communities, Version 1, 15th January 2025

New South Wales Government, Environmental Planning and Assessment Act, 1979 (as amended)

New South Wales Government, Regulations - CPTED Guidelines 2001

New South Wales Police – CPTED ‘Check List’, Revision 2020

Northrop, Infrastructure Servicing Assessment, Revision A, 16th January 2025

Parkwood Modular Buildings, Proposed Community Building, drawing AO1, 30th August 2024

Purple Apple Access, (Disability) Access Report, January 2025

12 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 little reported crime in the Gosforth locality over the five-year period July 2020 to June 2025.

The report obtained is tabled to indicate the obvious 'nil' reported crime rate given the undeveloped site. However, the categories will become relevant once the subdivision becomes an occupancy reality.

NSW Crime Statistics July 2020 to June 2025 - Gosforth (Suburb)											
	5 Year Trend to June 2025	Year to June 2021 Count	Year to June 2021 Rate	Year to June 2022 Count	Year to June 2022 Rate	Year to June 2023 Count	Year to June 2023 Rate	Year to June 2024 Count	Year to June 2024 Rate	Year to June 2025 Count	Year to June 2025 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.	1	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.	2	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.	2	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.	1	n.c.	0	n.c.	1	n.c.	1	n.c.	0	n.c.
Prohibited and regulated weapons offences	n.c.	0	n.c.	0	n.c.	1	n.c.	0	n.c.	0	n.c.
Arson	n.c.	0	n.c.	1	n.c.	0	n.c.	0	n.c.	2	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.

<p><i>Low Level Risks</i></p>	<p>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</p>
<p><i>Moderate Level Risks</i></p>	<p>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</p>
<p><i>High Level Risks</i></p>	<p>‘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</p>
<p><i>Extreme Level Risks</i></p>	<p>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</p>

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