



**NSW Police Force**

7 March 2023

Attention Maxwell Duncan  
Northern Beaches Council

**Re: Development Application No. DA2002/2081**

**Description: Change of use and construction of a golf club house and associated facilities.  
Address: Lot 2742/9999 Condamine Street MANLY VALE and WARRINGAH GOLF COURSE (DISTRICT PARK) Condamine Street NORTH MANLY and**

**Address: Warringah Golf Course Pro shop 292 Condamine Street NORTH MANLY and**

**Address: Warringah Golf Course Pro shop 292 Condamine Street NORTH MANLY and**

**Address: District Park Tennis and Squash Centre - Clubhouse & District Park Tennis and Squash Centre - Clubhouse Kentwell Road NORTH MANLY**

### **Proposed Development**

I refer to Council's email received on Wednesday 15<sup>th</sup> February 2023 requesting comments from the Northern Beaches Crime Prevention Officer in relation to the above-mentioned development application.

The proposed development seeks to provide an ancillary clubhouse and amenities building (Golf and Community Club), which is permitted with consent within the RE1 zone as the proposed development is an ancillary purpose to the Warringah Golf Club (defined as Outdoor Recreation Facility pursuant to WLEP2011).

Warringah Golf Club is building a new clubhouse on the area known as the Warringah Recreation Area at 433 Pittwater Road North Manly NSW 2100 on the northern corner of Pittwater Road and Kentwell Road. The development is on land owned by the Northern Beaches Council (NBC). NBC will be undertaking demolition, tree removal and development of parking areas and new recreational facilities at the site.

### **Introduction**

In April 2001, the NSW Minister for Planning introduced Crime Prevention Guidelines to section 79C of the Environmental Planning and Assessment Act, 1979. These guidelines require consent authorities to ensure that development provides safety and security to users and the community. If a development presents a crime risk, the guidelines can be used to justify modification of the development to minimise crime risk, or, refusal of the development on the grounds that crime risk cannot be appropriately minimised.

The guidelines contain two parts. Part A details the need for a formal crime risk assessment (Safer by design Evaluation- Not conducted on this site) to be done in conjunction with trained police and Part B outlines basic



Crime Prevention Through Environmental Design (CPTED) principles and strategies that can be used by consent authorities to justify the modification or proposals to minimise risk. (DUAP 2001:2)

### **Crime Prevention through Environmental Design (CPTED)**

Crime Prevention through Environmental Design (CPTED) is a crime prevention strategy that focuses on the planning, design and structure of cities and neighbourhoods. It reduces opportunities for crime by using design and place management principles that reduce the likelihood of essential crime ingredients from intersecting in time and space.

Offenders often make cost-benefit assessments of potential victims and locations before committing crime. CPTED aims to create the reality (or perception) that the costs of committing crime are greater than the likely benefits. This is achieved by creating social and environmental conditions that:

- Maximise risk to offenders (increasing the likelihood of detection, challenge and apprehension)
- Maximise the effort required to commit crime (increasing the time, energy and resources required to commit crime)
- Minimise the actual and perceived benefits of crime (removing, minimising or concealing crime attractors and rewards), and
- Minimise excuse-making opportunities (removing conditions that encourage/facilitate rationalisation of inappropriate behaviour).

CPTED employs four key strategies. These are Surveillance, Access Control, Territorial Reinforcement and Space/Activity Management.

### **Surveillance**

The attractiveness of crime targets can be reduced by providing opportunities for effective surveillance, both natural, technical and formal. Good surveillance means that people can see what others are doing. People feel safe in public areas when they can easily see and interact with others. Would-be offenders are often deterred from committing crime in areas with high levels of surveillance. *Passive surveillance* with the ability to control entry should be in place. For example: Having a sign in sheet for visitors, cameras upon entry and lockdown after hours. Physical barriers to secure the property from trespassers such as a fence and gate/security access are suggested.

**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. *Natural surveillance* is a by-product of well-planned, well-designed and well-used space.

- Entry and exit points should be designed so as to maximise surveillance opportunities to and from these areas from both inside as well as outside.
- The placement and orientation of common entry areas, foyers, reception areas etc. should maximise opportunities for natural surveillance by employers/employees etc and other guardians.



- Laminated glass walls and windows facilitate supervision of common entry areas and public areas such as playgrounds, BBQ areas and gardens.
- The distance in which a property is set back from the footpath acts as a transition zone or buffer between private and public space. These areas require good sight lines from private vantage points to public areas.
- Any enclosed areas can create significant visual obstruction. From a criminal's perspective, obstructions reduce supervision and provide opportunities for cover and entrapment.

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

- As the proposed development may be exposed to thefts, steal from persons, malicious damage and other offences, it is recommended that a closed-circuit television system (CCTV) which complies with the Australian Standard – Closed Circuit Television System AS:4806:2006 should be implemented to receive, hold or process data for the identification of people involved in anti-social or criminal behaviour. The system is obliged to conform with Federal, State or Territory Privacy and Surveillance Legislation.
- If installed, the CCTV system should consist of surveillance cameras strategically located in and around the new structure to provide maximum surveillance.
- Digital technology should be used to receive, store and process data. Recording equipment should be secured away from public access to restrict tampering with the equipment and data. The equipment needs to be checked and maintained on a regular basis.
- It is crucial even in the development stage that these cameras are installed as soon as power is available.
- If the use of CCTV is employed, it is advised that a lighting technician be consulted to ensure that all lighting supports the CCTV images. Signage should be displayed in and around the development to inform persons that CCTV is in use.
- Ensure that relevant staff be trained in the operation of the system and that the system is checked on a regular basis to ensure that it is working properly.

**Formal (or Organised) Surveillance** is achieved through the tactical positioning of guardians. An example would be the use of on-site supervisors at higher risk locations.

Police highly suggest the use of a CCTV system to monitor the common open spaces throughout the development, especially if no access control to the area is provided.



Based on information received from the Australian Federal Police, CCTV footage is effective in criminal matters when the images display shots of an alleged offender from the shoulder upwards. CCTV cameras need to be able to zoom in on a person of interest without loss of focus and/or quality. The owner should train all relevant staff of how to use the CCTV cameras.

Police would also suggest the implementation of height indicator stickers on the entrance/exit doors. These used in conjunction with CCTV, can give police an indication of an offender's height as they enter or exit, and in turn may assist in the identification of possible offenders.

### **Lighting and Technical Supervision**

There is a proven correlation between poor lighting, fear of crime, the avoidance of public places and crime opportunity (Painter, 1997). The Australian Standards, Lighting AS: 1158 now requires lighting engineers and designers to factor in crime risk and fear when choosing the type of luminaries/lighting levels.

The objective of security lighting is to deny criminals the advantage of being able to operate unobserved. However, if the area cannot be overlooked or viewed AT NIGHT, then the lighting will only help a criminal see what they are doing, not deter them.

- Lighting (lux) levels for this development must be commensurate with the crime risks identified in this evaluation. The emphasis should be on installing low glare/high uniformity lighting levels in line with Australian Standard AS: 1158
- Lighting sources should be compatible with requirements of any surveillance system installed within the development. (Poor positioning choices in relation to light can cause glare on surveillance screens).
- The luminaries (light covers) should be designed to reduce opportunities for malicious damage. Lighting within/around the development needs to be checked and maintained on a regular basis.

It is important that the communal areas are well supervised, by allowing natural surveillance of these sites. Building alignment and pedestrian routes allow for this however poorly supervised and sporadically used pedestrian routes often feature in serious crime. It is important that landscaping does not impinge on site lines and that these paths are well lit. Lighting should meet minimum Australian standards. Effective lighting can reduce fear, increase community activity, improve visibility and increase the likelihood that offenders will be detected and apprehended. Special attention should be made to lighting the entry and exit points from the buildings, car park and access/exit driveways.

### **Vegetation**

The safety objective of "to see and be seen" is important in landscaped areas. Vegetation is commonly used by criminals to aid concealment and entrapment opportunities. It is foreseen the development will have vegetation throughout the site, it must be emphasised that the vegetation, especially the shrubs and shade trees, be kept trimmed at all times. Lower tree limbs should be above average head height and shrubs should



not provide easy concealment. Vegetation closest to pedestrian pathways requires close attention. It is recommended that 3-5 metres of cleared space be located either side of residential pathways and bicycle routes. Thereafter, vegetation can be stepped back in height to maximise sightlines.

### **Territorial Reinforcement**

With few exceptions, criminals do not want to be detected, challenged or apprehended. For offenders, the capability of a guardian to detect, challenge or apprehend is an important consideration. The strategic location of supervisors and employees increases the risk to offenders and crime effort. It is argued that employees are more effective as guardians (crime deterrents) than passing members of the community. Territorial reinforcement can be achieved through:

- Design that encourages people to gather in public space and to feel some responsibility for its use and condition.
- Design with clear transitions and boundaries between public and private space.
- Clear design cues on who is to use space and what it is to be used for.

Confusion resulting from ambiguous entry design can legitimise exploration, trespassing and excuse making by opportunistic criminals. It is recommended that all public access points are well marked and inviting.

It is recommended that signage should be erected strategically around the external areas of the buildings to warn persons of any security measures in place.

### **Space/Activity Management - Environmental Maintenance**

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.

Clean, well-maintained areas often exhibit strong territorial cues. Rundown areas negatively impact upon perceptions of fear and may affect community confidence to use public space and ultimately, it may affect crime opportunity. Vandalism can induce fear and avoidance behaviour in a public space, therefore the rapid repair of vandalism and graffiti, the replacement of car park lighting, and general site cleanliness is important to create a feeling of ownership. Ownership increases the likelihood that people will report or attempt to prevent crime.

Many graffiti vandals favour porous building surfaces, as 'tags' are difficult to remove. Often a ghost image will remain even after cleaning. Easily damaged building materials may be less expensive to purchase initially, but their susceptibility to vandalism can make them a costly proposition in the long term, particularly in at-risk areas. This should be considered when selecting materials for construction.



**NSW Police Force**

- Ensure that any damage, graffiti, glass etching etc that may occur to the premises is cleaned/ repaired as soon as practicable. Light coloured surfaces and extensive glass areas may be targeted by graffiti offenders as they are a good surface for tagging.
- It is recommended that the external walls and fencing (if installed) on ground level are painted in a graffiti resistant paint which is easier to clean if tagged. Rapid removal is the best prevention strategy for graffiti. Rapid removal is best practised when completed within 24 hours of the graffiti being done.

It is recommended that an emergency control and evacuation plan which complies with the Australian Standard, Emergency Control Organisation and Procedures for Buildings, Structures and Workplace, AS:3745:2002 should be prepared and maintained by your development to assist management and staff in the event of an emergency. This standard sets out the requirements for the development of procedures for the controlled evacuation of the building, structures and workplaces during emergencies. Further information in relation to planning for emergencies can be obtained from Emergency NSW <http://www.emergency.nsw.gov.au> or Emergency Management Australia <http://www.ema.gov.au>.

**Access Control**

Physical and symbolic barriers can be used to attract, channel or restrict the movement of people. They minimise opportunities for crime and increase the effort required to commit crime. By making it clear where people are permitted to go or not go, it becomes difficult for potential offenders to reach and victimise people and their property. Illegible boundary markers and confusing spatial definition make it easy for criminals to make excuses for being in restricted areas. All areas of the development, not open to the public need to have clear indications of this. Any areas that are restricted should have a sign present so that criminals have no excuse to being in an area they are not supposed to. Warning signs should be strategically posted around the building to warn intruders of what security treatments have been implemented to reduce opportunities for crime. E.g., 'Warning, trespasser will be prosecuted.' Or 'Warning, these premises are under electronic surveillance.'

- Clear signage should be erected in and around the club to ensure that residents and members of the public do not enter restricted areas. Areas such as the board room, locker rooms, gaming room, office etc such have clear signage displayed on the doors. Ensure that these rooms are locked and secured at all times when not in use. This minimises opportunities for offenders to enter these restricted areas and hide or commit offences. Ensure these rooms are also fitted with lock sets which comply with the Building Code of Australia.
- Ensure that spare keys to any utility rooms, lockers etc are stored in a lockable cabinet in a safe secure area/ room. It is recommended that a key register be established to record all movements of master and spare keys to lockers and rooms throughout the club. Ensure that all cupboards in the boardroom are locked and secured at all times.
- There is no information included with plans as to the type of lock sets to be used on any of the doors and windows. Ensure that these comply with the Building Code of Australia.



**NSW Police Force**

- If the windows are able to be opened and are key locked ensure that they locked at all times when closed and keys are removed from the locks. Ensure that all keys are removed from the doors when they are locked and not in use and stored in a secure location.
- Ensure that access cannot be gained onto the new roof structure. Some offenders climb onto structures and gain access through the roof tops.
- It is unclear as to whether CCTV will be installed in the club. If CCTV system is installed it is suggested that cameras be installed over any new entry/ exit points to the club or areas of high risk.
- If a CCTV system is in place or going to be installed ensure that any security lighting supports the CCTV system. Often CCTV systems are installed but do not have the correct lighting to support the system and images cannot be clearly seen.
- It is suggested that security lighting be installed around the external of the club. Sensor lighting is good as it is cost effective and only activates when something passes through the zone.

**Thefts from Motor Vehicles**

The Northern Beaches Police Area Command (PAC) experiences regular and repeated incidents of thefts from motor vehicles. These thefts occur in highly populated areas and public car parks and private/communal garages.

Car parking areas should be well lit as per the Australian & New Zealand Lighting Standards. The walls and ceilings to the car park should be painted a light colour to increase reflectivity within the car parking areas.

Park Smarter signage can help to educate people not to leave valuable items visible in their cars and to ensure that they secure their vehicles appropriately.

CCTV should be used to monitor risk areas.





**NSW Police Force**

### **Other Recommendations to Consider**

Wheelie bins or other items should be locked away so that they cannot be used as a climbing aid. Ensure that all garbage bins are adequately secured, and any garbage area/bays are kept locked to reduce the risk of unauthorised entry. Garbage area/bays are at risk areas as they can be areas of entrapment. Chemically hardened glass toughened laminated glass with PVB interlayer and transparent polycarbonate sheeting can be an effective alternative to 'normal' glass in (certain) high-risk applications. When properly fitted, they are resistant to breakage. The applicant does not mention about the type of glass used for the development. Police suggest installing double interlayer glass on all facades.

Unfortunately, offenders target this type of development, both in its construction phase and when the building/s are complete. Police would support the use of security sensor lights and a security company to monitor the site while construction is in progress.

### **Disclaimer:**

NSW Police has a vital interest in ensuring the safety of members of the community and their property. By using recommendations contained within this document, any person who does so acknowledges that:

- It is not possible to make areas evaluated by NSW Police absolutely safe for the community and their property.
- Recommendations are based upon information provided to, and observations made by NSW Police at the time the document was prepared.
- The evaluation/report is a confidential document and is for use by the person/organisation referred to on page one.
- The contents of this evaluation/report are not to be copied or circulated otherwise than for the purposes of the person/organisation referred to on page one.

NSW Police hopes that by using the recommendations contained within this document, criminal activity will be reduced and the safety of members of the community and their property will be increased. However, it does not guarantee that all risks have been identified, or that the area evaluated will be free from criminal activity if its recommendations are followed.'

Kind regards

Sandra Fraietta  
Senior Constable  
Crime Prevention Officer  
PH: 02 9971 3339/9971 3231  
EMAIL: nbcpo@police.nsw.gov.au