



CPTED Assessment

Downtown Carpark Site Development

28 October 2025

B&A

Urban & Environmental

Prepared for: Precinct Properties New
Zealand Ltd

B&A Reference:

14987

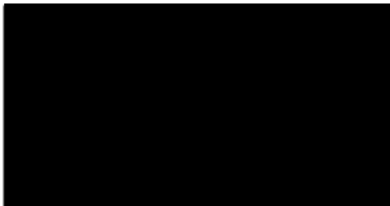
Status:

Final

Date:

28 October 2025

Prepared by:



Cam Wallace

Partner, Barker & Associates Limited

Contents

1.0	Executive Summary	4
2.0	Introduction	4
2.1	Project Overview	4
2.2	Project Background and Involvement to Date	5
2.3	Statement of Qualifications and Experience	5
3.0	Assessment Framework	6
3.1	What is CPTED?	6
3.2	Auckland Unitary Plan (Operative in Part) 2016	6
3.3	CPTED Guidance	7
4.0	Proposal	7
5.0	Site Context	8
5.1	Site Environs	8
5.2	Local Crime Profile	9
6.0	CPTED Assessment	11
6.1	Design & Visibility	11
6.2	Access & Movement	14
6.3	Ownership, Management & Maintenance	15
7.0	Conclusion	16

1.0 Executive Summary

This CPTED assessment has been prepared for the Downtown Carpark Site Development ("**Project** or **Proposal**") by Precinct Properties New Zealand Limited ("**Precinct**"), a listed project under the Fast-track Approvals Act 2024 ("**FTAA**"). This assessment focuses on the proposed network of public spaces and pedestrian laneways and their interface with the surrounding city centre environment and draws on the National Guidelines for Crime Prevention through Environmental Design in New Zealand (Ministry of Justice, 2005) ("**CPTED**") and the relevant provisions of the Auckland Unitary Plan.

Key features of the proposal that align with good CPTED practice includes:

- Extensive ground- and first-floor glazing maximises natural surveillance and transparency.
- Multiple building entrances and a wide mix of uses positioned across the site encourages continuous activity that enhances natural surveillance throughout the day and night.
- Chamfered and splayed building corners, in combination with generous laneway widths, and highly glazed façades eliminate concealment spots and support intuitive wayfinding through the site.
- Ground-floor setbacks, glazed façades and the removal of existing overbridges on Lower Hobson Street and Customs Street West significantly improve openness, pedestrian comfort, and perceived safety.
- Laneway alignments strengthen connections between key city-centre streets, integrating with existing desire lines.
- The Urban Room, which serves as a central node of activity that will help to draw people through the site and along the laneway network, increasing visibility and providing multiple route options for pedestrians.
- The use of high-quality materials and architectural consistency, which displays a strong sense of quality and ownership.

Overall, the development provides a well-considered, high-quality public realm that conveys clear ownership, supports safe movement, and fosters a lively and welcoming environment. No significant CPTED concerns have been identified, though detailed management measures—such as lighting, CCTV, and ongoing maintenance—will remain important at later stages.

2.0 Introduction

2.1 Project Overview

This CPTED assessment ("**assessment**" or "**report**") has been prepared for the Project by Precinct. The proposal is a Listed Project in Part A of Schedule 2 of the FTAA.

The Project broadly consists of the demolition of the existing carparking building (and ancillary pedestrian / vehicle overbridges) and replacement with three podium buildings, two towers, new public spaces and a new laneway network which involves modifications to the podia of existing adjacent buildings (HSBC and Aon) to provide connections to the wider city centre. This will provide

for a mixed-use precinct providing for commercial, hotel, residential, retail, food and beverage and civic uses.

The focus of this CPTED assessment relates to new public spaces and laneways proposed as well as the developments interface with the existing public realm.

2.2 Project Background and Involvement to Date

Development of the proposal has been undertaken over the previous three-years and has involved extensive input from a wide range of specialists along with independent design review from Eke Panuku's Technical Advisory Group ("**TAG**"). In addition, as part of the sale process for the site, Eke Panuku (now Auckland Urban Development Office) prepared essential outcomes and design guidance which required that "best practice CPTED (Crime Protection through Environmental Design) principles must be applied to all aspects of the development". As such, CPTED principles have generally been considered during the design process to date.

Nonetheless, an independent specialist review of through-site laneways was requested by Precinct and the design team. Its purpose was to outline CPTED strengths, any concerns, any opportunities and any suggestions regarding any mitigations or dependencies such as may be required. An initial CPTED review of the proposals was undertaken by Frank Stoks in September 2023. After the retirement of Mr Stoks, I have subsequently undertaken CPTED reviews of continued refinements to the Proposal. At a structural level, the Proposal has not substantially changed from that developed in 2023 and reviewed by Mr Stoks and Eke Panuku's TAG, rather the design has been continually refined to accommodate various changes in lower-level programming to better respond to projected market demands for space within the development.

2.3 Statement of Qualifications and Experience

I am an Urban Designer / Partner at B&A. B&A is a planning, urban design and landscape consultancy with offices around New Zealand. I have been employed at B&A since November 2018.

I hold the qualifications of Bachelor of Planning (First Class Hons) and Masters of Urban Design (First Class Hons) from the University of Auckland. I am a Full Member of the New Zealand Planning Institute and am a Registered Urban Designer with the Urban Designers Institute of Aotearoa ("**UDIA**"). I have 17 years of experience in the urban design, strategic planning and transport development, across both the private and public sector in New Zealand and United Kingdom.

I have a broad range of experience in urban design working on behalf of a range of clients including land developers, commercial entities and Councils in Auckland and around New Zealand. This has involved lead masterplanning projects for greenfield and brownfield redevelopment projects, urban design / CPTED review and assessment for resource consent and private plan change applications of varying scales, strategic and spatial planning projects, and preparation / presentation of urban design evidence at Council hearings and the Environment Court.

I confirm that, in my capacity as author of this report, I have read and abide by the Environment Court of New Zealand's Code of Conduct for Expert Witnesses Practice Note 2023 and the UDIA Code of Practice – Version A June 2024.

3.0 Assessment Framework

An assessment framework for this report applies the key principles of National Guidelines for Crime Prevention through Environmental Design in New Zealand and aligns them with the City Centre Zone and Downtown West Precinct objectives and policies of the Auckland Unitary Plan (Operative in Part) ("AUP"), to evaluate proposed public spaces and pedestrian laneways.

The framework is structured in three assessment domains (Design & Visibility; Access & Movement; Ownership, Management & Maintenance). In doing so, the framework addresses how the proposal will contribute to the Downtown West Precinct's anticipated design outcomes relating to the provision of an interconnected network of high-quality public open spaces and publicly accessible spaces, activated by uses around their periphery.

3.1 What is CPTED?

Crime and the fear of crime are important issues for communities across New Zealand and can have a significant effect on an individual's quality of life. People may avoid going out at night or stay away from areas because of their fear of crime. This in turn has downstream economic effects as people choose to avoid certain retail and entertainment areas in favour of those that are safer or perceived as safer. CPTED provides a framework that looks at how our environment can be designed to reduce opportunities for crime and to improve perceptions of safety amongst users. Put simply, if a site is designed well the likelihood of it being targeted for a crime may be reduced, people who use the areas perceive it as a safe environment, and potential criminals see the areas as risky place to commit crimes.

3.2 Auckland Unitary Plan (Operative in Part) 2016

Although CPTED is not specifically referenced within relevant sections of the AUP, principles relating to the physical design of spaces that impact on personal safety and fear of crime are contained throughout. Of relevance to the assessment of this proposal are various provisions contained within the Regional Policy Statement, City Centre Zone and Downtown West Precinct, including (my emphasis added):

- B2.3.2(1)(b) ***Manage the form and design*** of subdivision, use and development so that it contributes to a well-functioning urban environment [so that it] ***contributes to the safety of the site, street and neighbourhood***;
- H8.3(3)(c) ***Require development to be of a quality and design that positively contributes to*** pedestrian amenity, movement, ***safety*** and convenience ...;
- H8.8.2(a)(iii) the extent to which buildings have clearly defined public frontages that address the street and public open spaces to ***positively contribute to the public realm and pedestrian safety***;
- H8.8.2(f)(i) Where a through-site link is proposed ***the extent to which visibility to, from, and within the through-site link is provided to support public safety***, and wayfinding elements are integrated to guide pedestrians and enhance navigability; and (ii) The extent to which the quality of the pedestrian experience within the through-site link is achieved, including ***the provision of safety measures*** ...; and

- 1205.8.2(4)(c)(i) **visibility to, from, and within the pedestrian connection is provided to support public safety**; and (ii) wayfinding elements are integrated to guide pedestrians and enhance navigability with consideration to potential obstructions, level changes, signage and intersections with other pathways.

3.3 CPTED Guidance

The National Guidelines for Crime Prevention through Environmental Design were published by the Ministry of Justice in 2005. Part 1 of the guidelines identifies seven qualities that characterise well designed, safer places and are set out below:

- (1) **Access: Safe movement and connections** - Places with well-defined routes, spaces and entrances that provide for convenient and safe movement without compromising security.
- (2) **Surveillance and sightlines: See and be seen** - Places where all publicly accessible spaces are overlooked, and clear sightlines and good lighting provide maximum visibility.
- (3) **Layout: Clear and logical orientation** - Places laid out to discourage crime, enhance perception of safety and help orientation and way-finding.
- (4) **Activity mix: Eyes on the street** - Places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times by promoting a compatible mix of uses and increased use of public spaces.
- (5) **Sense of ownership: Showing a space is cared for** - Places that promote a sense of ownership, respect, territorial responsibility and community.
- (6) **Quality environments: Well designed, managed and maintained environments** - Places that provide a quality environment and are designed with management and maintenance in mind to discourage crime and promote community safety in the present and the future.
- (7) **Physical protection: Using active security measures** - Places that include necessary, well designed security features and elements.

It is important that the seven qualities are not viewed independently from one another. They are interrelated and complementary for evaluating the design of the physical environment. These qualities will be used to inform and structure the audit of the Project and wider site as well as ensure a comprehensive assessment consistent with a nationally recognised framework.

4.0 Proposal

From a CPTED perspective, key aspects of the Proposal relate to the design of Level 00 and Level 01 which incorporates a new public space and pedestrian laneway system that connects into existing routes already provided around Aon Tower and the HSBC Tower through to Lower Albert Street and Commercial Bay. These are identified on Figure 1 below. These laneways coverage in a new two-level public space – the Urban Room – located centrally within the application site. This space as well as the laneways are generally flanked by a combination of retail or commercial uses, in addition to multiple lobby spaces for a proposed hotel and residential apartment uses.

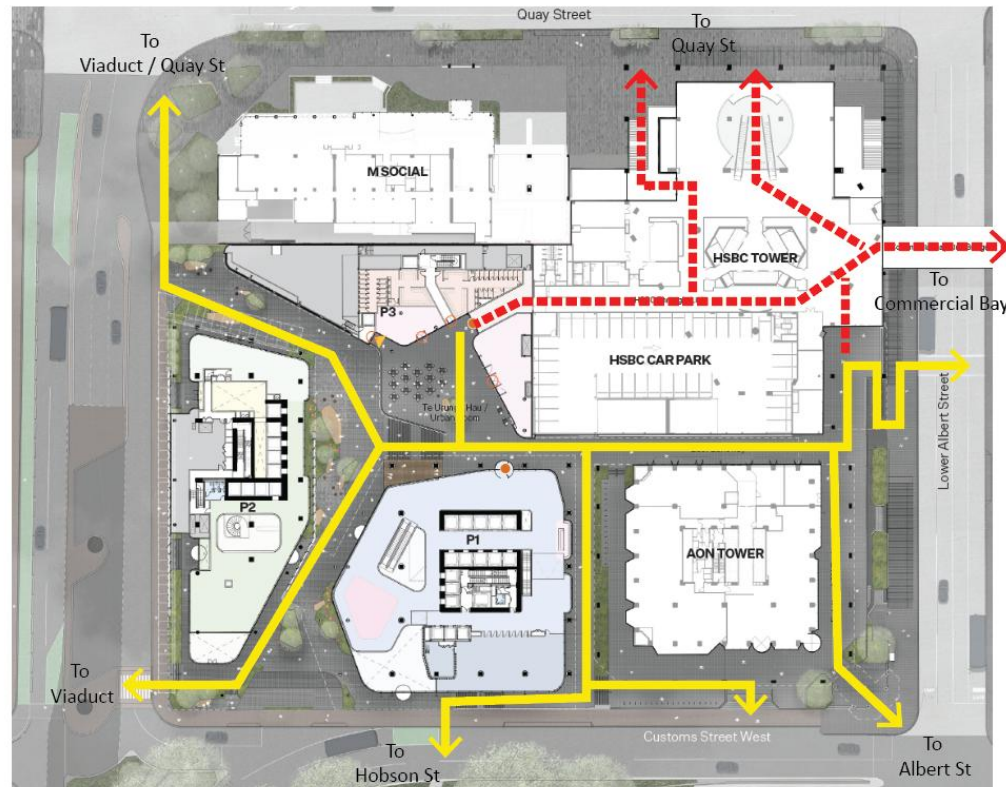


Figure 1 - Proposed Pedestrian Movement Network (yellow: 24/7; Red: during business hours)

Where relevant, specific details of the Proposal will be incorporated into the CPTED assessment contained in Section 5 of this report.

5.0 Site Context

5.1 Site Environs

The existing site and its surrounds have been described extensively on pages 3-5 of the Urban Design Assessment prepared by McIndoe Urban. I agree with his assessment and do not repeat these.

In addition to these observations, there are some aspects of the existing site environs that are particularly relevant for a CPTED assessment. Specifically:

- A north-south service lane currently runs through the block and will form the primary vehicle access for the development (and continue to provide vehicle access to Aon Tower and the HSBC Tower). This currently functions as a poor-quality, informal pedestrian shortcut between Quay Street and Customs Street West. It is not designed as a pedestrian thoroughfare (although features ground markings and wayfinding indicating it as such) and its character is defined by its primary servicing and vehicular functions. It is likely that this lane would be perceived as an undesirable / unsafe route for your average member of the public.

- There has been observed a notable concentration of rough sleepers around the Hobson Street flyover and Sturdee Street reserve. Informal observations by myself would indicate that the concentration of rough sleepers and / or homeless people immediately adjacent to the proposal site has increased over the past year. In addition, both Police and security personal have been observed visiting / attending to these people within the space on multiple occasions. This creates the potential for perceived intimidation and an unsafe environment which I would expect to discourage pedestrian movement along Customs Street West and Lower Hobson Street – especially by more vulnerable members of the public.
- The general quality of the streetscape along Customs Street West and Lower Hobson Street can best be described as poor and uninviting. The lack of activity, the architecture of the Downtown Carpark itself, the enclosure created by various road flyovers and rough sleeping community (including makeshift shelters) creates a negative impression of the area which may discourage its use by pedestrians and act as a psychological barrier to movement between the Viaduct and other parts of the City Centre.

5.2 Local Crime Profile

Provisional crime statistics (for offences that could be influenced by CPTED) down to a meshblock level were obtained from the New Zealand Police for the two preceding calendar years inclusive of 31 May 2023 through to 26 June 2025. The site sits within meshblock 0432800 which encompasses the block of land that forms the Downtown West area (i.e. the land bounded by Lower Hobson, Quay, Lower Albert and Customs streets) as shown below in Figure 2.



Figure 2 - Downtown West Meshblock - all reported crimes intensity plan (May 2023 - June 2025) (source: NZ Police)

A review of reported crime data indicates that most reported crimes in the Downtown West area are related to vehicle thefts or retail thefts which aligns with the current use of the Downtown Carpark. Most of all reported offences occur throughout a typical working day (between 8am and 6pm) and generally peak around midday (refer to Figure 3). There is nothing particularly unusual about this pattern and it is consistent with the wider City Centre.

In terms of personal harm offences such as assault or sexual assault, the Downtown West area has a relatively low level of reported offenses (refer to Figure 4). When these occur they are concentrated on Friday and Saturday nights and early Saturday and Sunday mornings and are generally aligned with times when alcohol consumption at nearby restaurants and bars is likely to be highest. The relatively low level of recorded offences is likely to be reflective of the limited numbers of bars or restaurants within the meshblock and a lower level of use / occupation during night hours as a result. This can be contrasted with the Lower Queen St / Commercial Bay area which saw 5x more recorded offences over the same time.

Overall, there is nothing particularly unusual about recorded criminal offences in and around the Downtown West area.

Hour	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Total
0					1		1	2
2	1						1	2
3							1	1
8	7	4	3			4	7	25
9	7	3	1	1	1		9	22
10	12	7	5	3	3	3	9	42
11	17	6	5	7	2	8	12	57
12	10	14	3	7	9	8	9	60
13	14	11	7	5	5	8	16	66
14	12	10	11	2	4	5	10	54
15	12	6	5	5	2	4	9	43
16	7	10	8	6	4	7	5	47
17	6	10	7	2	2	7	9	43
18	2	5	3	4	4	8	1	27
19					1			1
21	2							2
22				2				2
23							1	1
Total	109	86	58	44	38	62	100	497

Figure 3 - Theft related offences around Downtown West (May 2023 - June 2025) (source: NZ Police)

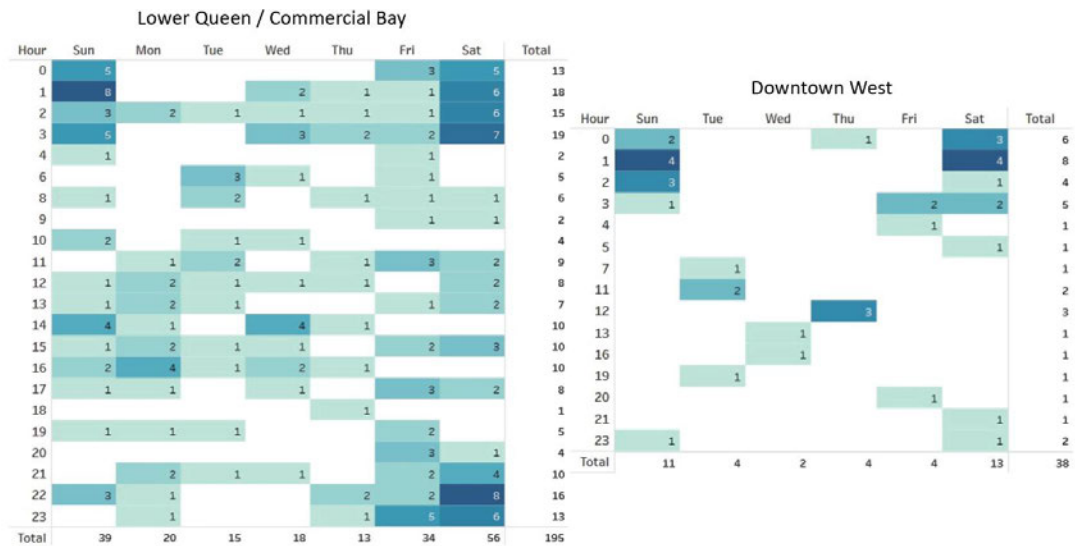


Figure 4 - Personal harm offences (e.g. assault) around Lower Queen/ Commercial Bay and Downtown West (May 2023 - June 2025) (source: NZ Police)

6.0 CPTED Assessment

6.1 Design & Visibility

The proposed Project design provides extensive ground- and first-floor glazing, particularly where it fronts new pedestrian laneways. This maximises natural surveillance and fosters a sense of openness and safety. Clear sightlines into and out of buildings will ensure that activity within tenancies contributes to passive oversight of the public realm, reducing concealment opportunities and creating a perception of security for users at all times of day. When combined with future retail and food and beverage uses that could actively “spill out” into the Urban Room and laneways through seating and/ or display areas, these predominantly transparent frontages will serve to create a lively internal streetscape that encourages legitimate activity and deters antisocial behaviour through constant occupation and movement. Further activation of the new public spaces is also provided by varied formal and informal seating opportunities integrated with the architecture and landscaping elements.

A review of the Level 00 and 01 plans indicates that there are no obvious concealment or entrapment opportunities inadvertently provided, and extended sightlines are available throughout the Proposal. Notably, the architecture has generally adopted chamfered edges to buildings (as opposed to a more traditional 90 degree corner) which has the added benefit of creating greater visibility splays near decision points when moving through the site. Importantly, the laneway network along with some secondary routes also converges at the generously scaled Urban Room (refer Figure 5) which will likely function as a key node of activity within the development due to the concentration of primary tower entrances as well as proposed retail tenancies. This has the benefit of eliminating long movement predictors through the site and provides pedestrians with alternatives to change routes or exit the development entirely.



Figure 5 – Urban Room Cross-section (source: Warren & Mahoney)

Figures 6 and 7 below provide indicative viewpoints looking down the main pedestrian laneways proposed within the development. The south-west and north-west laneways extend from key nodal points on Lower Hobson Street / Customs Street West into the Urban Room. The laneways are generously proportioned with the glazed canopy sitting between three to four storeys above ground level while the width of these spaces at their narrowest are 9 and 10m respectively. Both laneways provide opportunities for extended forward visibility into and out of the Urban Room providing a greater sense of openness / space for users which helps to foster greater perceptions of safety. Further, each laneway is lined with glazed walls over multiple levels and active internal uses which have multiple safety benefits. This includes the provision of passive surveillance of these spaces, some colonisation of these uses into the laneways (e.g. al fresco dining), opportunities for light spill during nighttime hours and a further sense of openness and generosity to the width of the laneways.



Figure 6 – South-west / north-west laneways (source: Warren & Mahoney)

The eastern laneway represents an extension of an already established laneway that currently terminates at the rear entrance to the Aon Tower and is 5m wide at its narrowest point. This laneway will now extend through to the Urban Room and terminate at the top of stairs. The northern interface to the eastern laneway will remain screened carparking associated with the HSBC Tower, whilst the southern interface is and will be highly glazed and feature several retail tenancies and primary building access points. An existing verandah (ca. 4m in height) will be removed and replaced with a new 8m high glazed ceiling that will help to create a more generous

space for pedestrians. The southern laneway is split into two halves that sit on slightly different levels separated by a landscaping bed between the existing Aon Tower and the new Tower 1 proposed. It will primarily be accessed via stairs leading from Customs Street West. The location of this laneway is unlikely to be immediately intuitive for visitors but it will still function as an important route for regular occupants of the office space within Tower 1. The primary pedestrian route is around 4.3m in width with the glazed canopy around 7m above. Although smaller than the other laneways, the southern laneway still retains a degree of generosity and openness in its design that is supported by the glazed, double height lobby to the Tower 1 office uses.



Figure 7 – East / south laneways (source: Warren & Mahoney)

Externally, similar principles to the design of building façades relative to Lower Hobson Street and Customs Street West have been adopted. This includes the regular provision of both primary and secondary building entrances and high levels of glazing providing for greater levels of activity and natural surveillance of the public realm. This will have the benefit of helping to activate the external edges of the site, which combined with the removal of the carpark overbridge, will represent a significant enhancement of the surrounding streetscape compared with what currently exists. A further key design feature of the proposal includes the configuration of buildings around the south-western and south-western laneway entrances. In both instances, the buildings have been designed to “open out” through splayed building footprints which serve to visually signal the presence of these laneways, creating an intuitive architectural cue that helps guide pedestrian movement. This will serve to “invite” pedestrians into laneways by framing entrances with a wider visual field, making these routes appear safer, more open, and more accessible.



Figure 8 - Customs Street West Frontage (source: Warren & Mahoney)

Regarding the existing north-south service lane which runs through the site, the Proposal introduces a significant change to its design and appearance by enclosing it beneath the Level 01 podium structure. The enclosure of this space as well as increased movement of vehicles throughout the day are likely to act as a deterrence for its use by pedestrians. Further, there is no obvious connectivity benefits in enabling the public to be able to utilise the service lane as an unencumbered north-south route, noting it does not respond to any obvious desire lines and more amenable alternatives are provided in proximity (via Lower Albert Street or through the proposal itself during normal business hours). However, based on the plans it appears that pedestrians would remain free to use this as a cut-through to Quay Street.

I do not consider that my concerns require a fundamental redesign of any aspect of the Proposal in this location. Rather, further consideration to the management of this space will need to be given. This includes the potential to secure the space through use of barriers, lighting, surveillance (e.g. CCTV) and wayfinding. In my opinion, it would be beneficial to actively encourage pedestrians, through design, to utilise the new north-south routes created through the site or existing Lower Hobson / Lower Albert Streets.

6.2 Access & Movement

There are two elements of relevance to the Proposal. Firstly, movement to and from the site and secondly movement through and around the site.

Regarding the positioning and alignment of the laneways themselves these are important to consider in the context of a CPTED assessment as they ideally should support a wider movement function to ensure they are convenient and likely to be used. The eastern and southern laneway locations are driven by the nature of existing development around the site (i.e. they are essentially fixed) but are supported by the proposed locations of entrances to office lobby spaces to help support usage. The south-western laneway extends from the Urban Room on an alignment with Sturdee Street helping to integrate the development into wider neighbourhood desire lines established by the existing street network. The north-western laneway extends from the Urban Room towards the north-western corner of the site at the boundary with M Social. This laneway

does not align with any obvious desire line but does terminate near a widened section of footpath / public space near the intersection of Lower Hobson and Quay Streets and is supported by the removal of the pedestrian overbridge and the chamfered building footprints helping to draw people in from this area.

The Urban Room itself functions as a terminating node for each of the laneways and provides an intermediary destination along these routes for pedestrians who pass through the site. It will be activated by adjacent uses and through formal and informal seating arrangements, whilst proposed landscaping provides an opportunity for some “green relief” from the surrounding urban environment. These features should help to attract people and help promote use of the proposed laneway network by both regular occupants and visitors to the area.

Applying to both internal and external movements, the proposal provides for the inclusion of multiple building entrances serving retail, office, residential, and hotel components (see Figure 9 for example). This will serve to increase the frequency and diversity of users moving through the space, thereby enhancing the volume and consistency of passive surveillance of external streets, the laneways and the Urban Room.



Figure 9 - Tower 2 L00 Plan (source: Warren & Mahoney)

The (likely) presence of a 24/7 hotel concierge and the porte cochere in the south-western corner of the proposal will also extend observation / passive surveillance through the night ensuring continuous oversight and reinforcing a sense of territorial ownership and safety even outside normal business hours along Customs Street West and Lower Hobson Street. Further, buildings are set back at ground floor level from the street boundaries. In the context of the existing site, the narrow footpaths combined with the sense of enclosure created by the Lower Hobson Flyover and carpark building itself creates an unwelcoming street environment. By setting the buildings back, more space is given back to the public realm supporting greater levels of openness as well as better accommodating the likely increase of pedestrians that the proposal will generate in this part of the City Centre. In my opinion, these changes represent a significant enhancement in actual or perceived levels of safety as well as convenience along these public streets.

6.3 Ownership, Management & Maintenance

A sense of ownership is closely linked to the overall quality and maintenance of a place. Places that are able to convey a strong sense of ownership are less likely to be seen as attractive for potential

offenders. For example, a place with a strong sense of ownership may be less likely a target of vandalism as offenders know that control and monitoring of that space is more likely, resulting in that offender being observed or caught.

The ability to strongly influence these matters at the resource consent stage is limited. However, I believe the layout and configuration of buildings and units has been well considered and will support an attractive and well surveilled environment which will help to convey a strong sense of ownership. Further, the very nature of the Proposal, including its waterfront location, scale, likely occupancy and the track record of the applicant indicate the development will provide a high-quality offer with expectations over quality and ongoing maintenance. Materiality shown on the architectural and landscape architectural plans shows the proposed use of robust, durable materials including brick, pavers and glass that are generally low maintenance and retain their appearance.

The laneways themselves pass through what has essentially been designed to be, and be perceived as, highly accessible public realm. However, there is a clear transition between the public realm outside the site and the public realm-like space within through architectural cues, landscaping and surface treatments. Further, the roof / canopy extending over the Urban Room and laneways help to differentiate these spaces from a typical public space. The existing through-site links through the Commercial Bay development help to illustrate this point and I expect that the proposal would function in a similar manner.

Ongoing maintenance and management regimes for the development are typically resolved through later design stages and once occupation / use of the spaces commences. CPTED guidance notes that the design and quality of an environment along with its maintenance can have an impact on both the actual and perceived safety of a place.

Ongoing management of buildings and spaces within the proposal is expected to be developed in future and will be influenced, in part, but the specific requirements of future tenants. I would expect that this would include detailed security arrangements addressing things like access control (e.g. swipe access), CCTV and monitoring, security lighting and active security presence / patrols.

7.0 Conclusion

In conclusion, the Proposal demonstrates a strong alignment with good CPTED practice and will support relevant objectives and policies of the AUP that relate to personal safety. The combination of extensive ground- and first-floor glazing, active retail and hospitality uses, and multiple building entrances creates a high level of natural surveillance and activity across the site. These features work cohesively to reduce concealment opportunities and promote a sense of openness, safety, and vitality throughout the laneways and public spaces. The architectural approach — including chamfered and splayed building corners, high-quality materials, generous laneway widths, and highly glazed frontages — enhances forward visibility and wayfinding, ensuring that pedestrians feel secure and can easily orientate themselves as they move through the development.

The network of laneways converging on the Urban Room provides a clearly legible and animated public environment supported by varied seating, landscaping, and continuous activity from adjoining tenancies. Externally, improved transparency of the building form, physical setbacks, and active edges along Customs Street West and Lower Hobson Street significantly enhance the

pedestrian experience and perceived safety compared with existing conditions. Overall, the proposal does not raise any particular safety concerns.