

Submission (Draft) on Safer Places by Design

About WALGA

The Western Australian Local Government Association (WALGA) is the peak industry body for Local Government in Western Australia. WALGA is an independent, membership-based group representing and supporting the work and interests of 139 Local Governments in Western Australia.

WALGA provides an essential voice for 1,222 elected members and approximately 22,000 Local Government employees as well as over 2.5 million constituents of Local Governments in Western Australia. WALGA also provides professional advice and offers services that provide financial benefits to Local Governments and the communities they serve.

Local Government and Crime Prevention Through Environmental Design (CPTED)

WALGA welcomes the opportunity to provide comment on the draft Safer Places by Design Planning Guidelines (the Guidelines). Community safety and crime reduction make a significant contribution to liveability and wellbeing for communities, as well as benefit local economies and contribute to community pride. Communities have a strong expectation that they can feel safe in their homes, neighbourhoods and town centres, and that Local Governments play a key role in contributing to this safety. As such Local Governments are actively involved in crime prevention and supporting community safety outcomes including provision of CCTV, graffiti management, community security patrols and education programs. In addition, Local Governments create safe environments through applying CPTED principles to strategies, plans and other documents in the planning framework, and to the assessment of development proposals. Ensuring new and existing development maximises safety through application of CPTED principles is therefore an important issue for the Sector.

In recognition of Local Government's strong interest in community safety and crime prevention, WALGA has developed an advocacy position on the topic. Position 3.5: Crime Prevention states:

The Association supports Local Government initiatives that contribute to effective community safety and crime prevention outcomes in their communities.

Consultation process

From mid-2021, WALGA, alongside other stakeholders participated in a working group convened by the Department of Planning, Lands and Heritage (DPLH) to review and provide comment on the drafting of the Guidelines. In addition, DPLH hosted two online workshops open to Local Government officers and other stakeholders during the public consultation period in February 2022 to provide an opportunity for feedback from primary users of the document. WALGA commends

the Department’s approach to the development of the Guidelines and the opportunity afforded to Local Government to contribute to their formulation.

During the public comment period WALGA sought comment from Local Governments to inform this submission. This submission reflects the broad interest of the Local Government Sector in relation to achieving crime prevention through environmental design and has been informed by comments from Local Government officers at the online workshops.

General comments

The draft Guidelines are a welcome update to current State guidance on CPTED through the *Designing out Crime Planning Guidelines* released in 2006. The principles and processes described in the draft Guidelines will assist Local Governments in assessing new and existing development against CPTED principles to increase community safety. The document is well-structured, readable and makes good use of annotated diagrams and images to convey key concepts.

The comments below are intended to ensure Local Governments are well equipped to utilise the Guidelines as intended.

Comments
Local Government and crime prevention/community safety
<p>As outlined above, Local Government plays a critical role in crime prevention and community safety, and this role could be better articulated in the preliminary sections of the document. For example in part 1.5 ‘Who should use the Guidelines,’ rather than dispersing various Local Government roles across key user groups, Local Government should be identified as a standalone key user group. The distinct roles within Local Government and how each could apply the Guidelines can then be covered under this heading.</p> <p>Whilst the draft Guidelines cover decision-making and project planning roles of Local Government, additional roles for Local Government include community safety and community development. These service areas are important stakeholders that may be consulted on development proposals and sit on local crime advisory groups that may make use of the Guidelines, and should therefore be referred to in the Guidelines.</p>
Application of the Guidelines
<p>Further guidance is needed on how parts of the document apply to certain user groups. For example, the checklists included at Appendix 3 could, in addition to stating ‘when to use’ detail ‘who should use’ to clarify which should be used by proponents, design review, decisionmakers etc. For example in Part 1.5 <i>Who should use the Guidelines?</i> rather than/in addition to the subheading ‘benefits include,’ a subheading ‘how to use this document’ could outline how each user group could apply relevant sections of the Guidelines.</p>
Scenarios
<p>Consideration should be given to the following in addition to the scenarios included in part 4 of the Guidelines:</p> <ul style="list-style-type: none"> Guidance on how existing developments can be retrofitted with CPTED principles. For example 4.7 Pedestrian Access Ways (PAWs) are common in established suburbs of Perth, and guidance on improving safety of these sites is suggested.

Comments

Similarly, how CPTED principles can be applied in established residential areas in addition to new/greenfield development.

- Scenario for residential development adjoining public open space, as this is a common typology in new development and CPTED approaches can enhance use of both public and private open space. As above, the scenario should be articulated to cover both new development and adaptation of existing development to align with CPTED principles.
- Currently the Guidelines cover 'public spaces' as a whole at 4.3 – clearer guidance on considerations specific to sites within public space could be provided. For example public toilets: given the higher perception of crime risk at these locations and the need for CPTED to form an integral part of the design of these facilities. [Brisbane City Council Public Toilet Design Guidelines](#) for example provide detailed information on the need for CPTED principles in design of these facilities and relevant considerations.

Diagrams and images

Annotated illustrations are used effectively in Part 4 of the document to provide real-world context to the CPTED principles. These will be a useful tool for demonstrating CPTED principles to proponents as well as communicating with the community.

The figures in Part 2 however could more clearly demonstrate what the highlighted (in orange) sections of the diagrams refer to. Without labelling, there is some ambiguity on what the highlighted sections refer to and how they are linked to the considerations/items to avoid.

Training and implementation

WALGA recommends that further training for Local Governments and other key user groups (e.g. planning consultants) be provided on implementation of the Guidelines. Such training could provide development assessment/design review case studies for users to gain familiarity in applying the principles, checklists and other tools within the Guidelines to real-world development proposals/examples. Local Governments could also provide examples to DesignWA and other Local Governments on integration of the CPTED principles into local planning policies and other strategic documents.

It is noted that the status of the document as guidelines enables them to be updated with greater ease than if they carried the status of a state planning policy. It is therefore suggested that given the ever-evolving nature of crime and particularly cybercrime, that the Guidelines be subject to review by user groups during their implementation and amended as required to reflect best practice.

Thank you for the opportunity to provide comment on the draft Safer Places by Design Guidelines. The document is well-structured, cohesive and with the amendments outlined above will assist Local Governments in incorporating the CPTED principles in their design and decision-making capacities to enhance community safety. WALGA commends DesignWA on a document which meets the expectations of key user groups and looks forward to further involvement with DesignWA on implementation of the Guidelines.