Safer Places by Design

Crime Prevention Through Environmental Design Guidelines

Consultation Summary

How we consulted.

The document was released for public comment on 15th December 2021 and closed on 25th March 2022 for a period of 3 months.

There were three methods from which feedback was sought for the *Safer Places by Design Guidelines* (the Guidelines) document during the public consultation period:

1.   Meetings and presentations
2.   Consultation workshops (Face to face or via Team/Zoom)
3.   Submissions through the DPLH consultation hub and emails to Design WA inbox

1. **Consultation workshops**
    Five consultation workshops were held between January and February 2022 with various stakeholders.
    Participating groups included:
    i.   State Government departments
    ii.   Local government authorities through WALGA – including planning officers and community safety officers
    iii. Industry peak bodies
    iv.   Consultant planners

2. **Submissions**
    The Guidelines were posted on the DPLH Consultation Hub website with a series of questions. See **Appendix 1**. Applicants could either complete the questionnaire or submit an email to the Design WA inbox.

3. **Meetings and presentations**
    A range of meetings and presentations were held to introduce the draft guidelines, speak to the updated principles and processes and answer questions from various stakeholders. Groups participating in these included:
    i.   DPLH internal teams (Gateway Group)
    ii.   Committee for Perth (Urban Design reference group)

What we received.

Workshops and meetings

There were approximately 90 participants for these sessions from the following areas:

        6 DPLH internal teams
        6 State Government departments
        12 Local government authorities
        10 Private consultants
        6 Peak bodies
        2 Community organisations

*Stakeholder workshop details are listed in **Appendix 2**.*

Submissions
A total of 29 submissions were received (18 via Consultation Hub and 11 via emails). Submissions were received from:

        2 Government departments.
        16 Local government authorities
        (including WLAGA and 3 respondents from the same LGA)
        3 Professional bodies
        2 Consultants (design)
        2 Consultants (security/CPTED)
        4 Community and Public

Submission details are listed in Appendix 3.

What we heard (key themes).

General

Overall the document received positive feedback. The format and structure was regarded clear and was generally well supported.

Most local governments supported the Guidelines and they were seen to assist in incorporating CPTED principles into design and decision-making to enhance community safety. They were supportive of the Guidelines being prepared and implemented, although some questioned the effectiveness of Guidelines as a non-mandatory document. Counter to this WALGA considered the Guideline status of the document a benefit as it enabled easy revision and updating.

There were comments that the Guidelines should align more closely with ISO 22341-2021: *Security and Resilience — Protective security — Guidelines for crime prevention through environmental design* (published Jan 2022).

It was suggested that a fact sheet included in the document would assist usability.

Graphics

Generally, the graphics and photographic illustrations were well received. Most agreed that they make the document easy to read and follow. The examples provided are appropriate and help to illustrate the CPTED Principles.

Some feedback suggested the following was needed:
- more photographic examples of other land use types such as commercial, industrial, and rural areas
- more photographic examples of designs that demonstrate poor CPTED outcomes. Having these 'bad' examples will make it easier to understand the intent of the principles and decipher the good from the bad
  - examples of retrofitted development which show the 'before' and 'after' effects of CPTED considerations
  - updated scenario diagrams including the pedestrian accessway example. Suggested an illustration of more realistic solutions to common PAW problems
  - additional scenarios for a pedestrian underpass, taverns/small bars/liquor shops, construction sites and staged development sites, and residential development adjacent to public open space.

The Four CPTED Principles (Part 2)

Most respondents approved of the objectives and considerations outlined by the four main CPTED Principles. Various suggestions and improvements to the Principles have been provided, many are quite detailed. Some suggested:
- more emphasis on activation of street as a means of reducing crime
- concerns the four CPTED Principles do not align with ISO's 6 Principles.
- Inclusion of considerations that address retrofitting existing spaces and developments
- Inclusion of how different users, i.e. women and people with disabilities, are considered in the application of CTPED

CPTED Process (Part 3)

Feedback generally supported the proposed CPTED assessment process. There were concerns that the low and high-risk definition was too broad and at least another medium level risk should be introduced.

Similarly, some local governments were concerned that the definition of simple and complex projects was not clear enough and that proponents would find workarounds to argue that their projects falls under the "simple" category to avoid doing a detailed risk assessment statement.

Application

Some local governments were concerned with the application/implementation of the Guidelines. Some comments outlined the following:

- without a firmer statutory footing it will be difficult in practice to secure more from an applicant than the minimum information necessary to validate an application
- while an interrelationship with SPP7 is identified there is perhaps scope for its profile/statutory weight to be strengthened by being recognised as an annex to SPP 7.0 and used as such
- how are the guidelines applied when there is no planning approval required (e.g. small scale development exempted from DA)
- some concerns with State and local CPTED guidelines' overlapping and consistency (e.g. some local governments require provision of CCTV cameras while the Guidelines identify CCTV as a secondary response).

Additional Comments

Some feedback commented that a focus on greater visibility for a people and place-centred approach to designing out crime would improve the response to what is a complex social issue. Other comments received noted the following:

- a need for ongoing training to help educate the industry on how to use this guideline
- That the Guidelines should also provide guidance on 'low tech' risk (e.g. lone gunman/distressed man with knife/disgruntled employee/hostile characters, etc)

What we did.

Following formal engagement, an assessment of submissions was undertaken. Feedback and responses were analysed, with any required modifications identified and implemented in the final version of the Guidelines.

In response to comments and to aid in understanding the Guidelines, a summary sheet has been included at the start of the document.

Graphics

A greater variety of photographs were included to demonstrate other conditions, such as rural areas, low density environments and examples of poor CPTED outcomes.

The pedestrian accessway (PAW) scenario has been updated to demonstrate a more realistic PAW condition and solutions.

Additional scenarios were considered. A scenario showing residential development adjacent to public space has been included. A before and after scenario of a water basin has been included to demonstrate the effects of applying CPTED considerations in a retrofit scenario.

The Four CPTED Principles (Part 1)

Submission comments were considered in detail and updates to the considerations under each principle were made. Considerations relevant for retrofit scenarios were included in a number of the principles.

Considerations include reference to inclusivity and consideration of various users.

A review of the ISO's 6 Principles was undertaken and Dr Paul Cozens was consulted. While the principles differ in name, the considerations in each are well aligned with the exception of Social (2nd Generation) CPTED. The principles of 2nd Generation CPTED focus on explicit social and cultural dynamics, which are considered out of scope for the Guidelines.

CPTED Process (Part 2)

In response to comments for inclusion of a medium crime risk level, the process section has been updated for flexibility in the application of crime risk levels and now includes an additional step.

Application

Comments relating to the statutory footing are noted but not within the scope of the Guidelines. There is a closer relationship to SPP 7.0 and the Ten Design Principles, in particular 'Safety'.

Application of the guidelines where no planning approval is required will largely rely on the level of awareness designers and/or project managers have of CPTED and the Guidelines.

Additional Comments

There may be opportunity for implementation and training to ensure awareness of the document and comfort in its application.

Appendix 1- Consultation Hub template

Feedback Form - Draft Safer Places by Design Guidelines

As part of the 2019 Action Plan for Planning Reform, the Department of Planning, Lands and Heritage has developed the draft Safer Places by Design Guidelines (the Guidelines) to support the creation of well-designed urban environments through the principles of 'crime prevention through environmental design' (CPTED).

The Guidelines provide a practical resource to assist designers, planners, developers, decision-makers, landowners and community in the application of CPTED within the context of the WA planning system.

The Guidelines recommend principles and processes to integrate CPTED responses into private and public developments and planning frameworks. The Guidelines aim to encourage the integration of CPTED thinking into the design, functional brief, implementation and evaluation of development projects.

The feedback form is to be emailed to designwa@dplh.wa.gv.au by 5.00pm Friday 25th March.

Submitters details:

Submitter's Name
Insert Name
Email address
Insert Email
Organisation name (if applicable)
Insert Org Name
Organisation type
Choose an item.
Submissions may be published as part of the consultation process. Do you wish to have your name and (if applicable) your company's name removed from your submission?
Choose an item.

1. **Do you support the principles and processes of the Guidelines?**	Choose an item.
Please outline any suggested improvements below:	

DESIGN WA
For a Better
Built Environment

Department of **Planning,
Lands and Heritage**

GOVERNMENT OF
WESTERN AUSTRALIA

Insert Comments here

2. **Is the structure of the Guidelines appropriate and clear? Is it easy to follow?**	Choose an item.
Please outline any suggested improvements below:	
Insert Comments here	

3. **Is it clear how the Guidelines are to be applied?**	Choose an item.
Please outline any suggested improvements below:	
Insert Comments here	

4. **Do the principles/considerations (Part 2) cover most situations and outcomes? Is there anything we've missed?**	Choose an item.
Please outline any suggested improvements below:	
Insert Comments here	

5. **Does the CPTED process (Part 3) provide sufficient guidance on how to apply the CPTED principles?**	Choose an item.
Please outline any suggested improvements below:	
Insert Comments here	

6. **Are the scenarios (Part 4) helpful? Do they cover typical CPTED situations?**	Choose an item.
Please outline any suggested improvements below:	
Insert Comments here	

7. **Do you find the diagrams and images easy to follow? Are they helpful?**	Choose an item.
Please outline any suggested improvements below:	

Insert Comments here

8. **Are the checklists (Appendix) provided in the Guidelines a useful resource?**	Choose an item.
Please outline any suggested improvements below:	
Insert Comments here	

9. **Do you have any additional comments?**	Choose an item.
Please outline any suggested improvements below:	
Insert Comments here	

Appendix 2- Stakeholder workshops and meetings

1. Meetings and presentations

DPLH Gateway Group 8 Sept 2021 (approximately 10 attendees)
Land Use Planning teams – policy advisory group

Committee for Perth - Reshaping Working Group 7 Feb 2022 (12 attendees)
Committee for Perth members
Element Advisory

2. Public consultation workshops

DPLH 18 Jan 2022 (16 attendees)

Strategy and Engagement	Reform, Design and State Assessment
Land Use Planning teams	METRONET
Office of the Government Architect	Heritage

State Government and CPTED Reference Group 31 Jan 2022 (31 invitees/8 attendees)

Department of Communities x 5	Department of Local Government (DLGSC)
Department of Finance	City of Perth (as part of the CPTED reference group)
Development WA	City of Bunbury (as part of the CPTED reference group)
Office of Government Architect	Private Consultant (Urban Designer)
WA Police x 3	Designing Out Crime Centre (CPTED expert Dr Paul Cozens)

WALGA 3 Feb 2022 (31 registered, 17 attendees)

City of Cockburn x 3
Injury Matters x 2   City of Wanneroo x 4
City of Kwinana x 3   City of Joondalup
Shire of Collie   City of Fremantle
Shire of Manjimup   City of Perth x 2
City of Canning   WALGA x 2
Shire of Serpentine Jarrahdale   WA Police/Graffiti Taskforce x 2
EMRC   Shire of Bruce Rock

Peak Bodies and Consultant Planners 8 Feb 2022 (14 invitees, 2 attendees)

Place Laboratory   Australian Institute of Landscape Architects (AILA)
Urbis   Hames Sharley
Property Council Australia (PCA)   Element Advisory
Urban Design Institute of Australia (UDIA)   Rowe Group
Local Government Planners' Association (LGPA)   TBB Planning
Australian Institute of Architects (AIA)   Shape Urban
Planning Institute of Australia (PIA)   Hassell

WALGA 9 Feb 2022 (38 registered, 13 attendees)

Shire of Broome x 5	City of Karratha
City of Armadale	City of Greater Geraldton
Shire of Wyndham East Kimberley	Town of Port Hedland x 2
Shire of Northam	City of Wanneroo
Town of Cambridge	City of Rockingham
City of Bunbury	City of Cockburn
city of Kwinana x 3	Town of East Fremantle
City of Mandurah	City of Busselton
Shire of Augusta Margaret River	City of Swan
City of Vincent x 2	Town of East Fremantle
Shire of Harvey	City of Belmont
City of Kalamunda x 2	WALGA
Augusta Margaret River Shire	

Appendix 3- Submissions

<u>Consultation Hub (18 submissions)</u>

City of Perth

Shire of Broome

City of Wanneroo x 2

Local Government Officer (LGA undisclosed)

Town of Victoria Park

Department of Communities

City of Joondalup

Australian Institute of Architects (AIA)

City of Belmont

Australian Institute of Landscape Architects (AILA)

City of Cockburn

Hatch Roberts Day (Urban Design/Planning Consultant)

City of Kalamunda

Community

City of Bunbury

Public x 2

<u>Email (11 submissions)</u>

City of Vincent

Department of Finance (Building and Contracts)

Town of Victoria Park

ARUP (Engineering/Planning Consultant)

City of Kwinana

Aurecon (Engineering and advisory firm, built environment security

City of Wanneroo

specialist across ANZ)

WALGA

Coretex Consulting Pty Ltd (Transport/Mining/Oil &

Planning Institute of Australia (PIA)

Gas/Utilities/Chemical Processing/Construction

Committee for Perth