

Application for review before the Honourable Amber-Jade Sanderson MLA (Minister for Health and Mental Health) pursuant to section 246(2)(a) of the *Planning and Development Act 2005*

BETWEEN:

RUAH COMMUNITY SERVICES LTD

Applicant

and

CITY OF PERTH

Respondent

APPLICANT'S SUBMISSIONS

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Introduction

1 Ruah Community Services Ltd (**Ruah**), through PTS Town Planning Pty Ltd, sought planning approval from the City of Perth (**City**) to operate a Safe Night Space for Women (**SNS**) at 247-249 James Street, Northbridge (**Northbridge SNS**).

Attached hereto and marked 'Attachment 1' are the materials that comprised the applications for planning approval.

- 2 Ruah operated a SNS service at the Rod Evans Community Centre, East Perth (**East Perth SNS**) from 31 May 2021 to 29 November 2023. The purpose in seeking the approvals is to recommence at the new location of 247-249 James Street, Northbridge (**247-249 James Street**) the service that was provided at the East Perth SNS (with service improvements based on learnings from the operation of the East Perth SNS).
- 3 The Northbridge SNS will be an overnight service responding to the urgent need for a safe and culturally secure night space for women sleeping rough in Perth.
- 4 A report was prepared by the executive of the City in respect of the applications for consideration by the Council of the City. That report recommended conditional approval of the applications.

Attached hereto and marked 'Attachment 2' is the report prepared for the Council of the City.

- 5 The City conditionally approved the applications at the meeting of its Council on 27 February 2024 (**Approval**).

Attached hereto and marked 'Attachment 3' is the City's 'Notice of Determination on Application for Development Approval' advising of the Approval.

- 6 Ruah lodged an application for review with the State Administrative Tribunal (**Tribunal**) on 6 March 2024 in respect of conditions 2-4 of the Approval.

Attached hereto and marked 'Attachment 4' is the application for review lodged with the Tribunal.

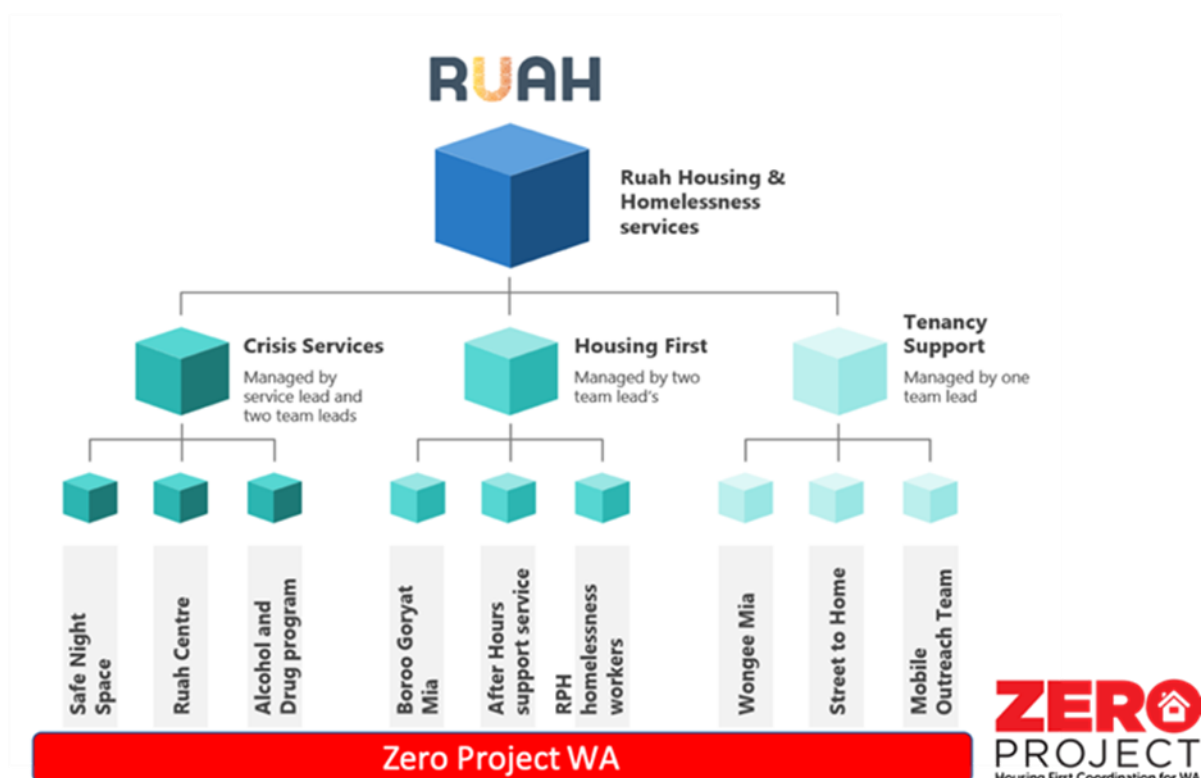
- 7 On 15 March 2024 the Hon. Minister for Planning exercised the power available to him in section 246(2)(a) of the *Planning and Development Act 2005 (Act)* and directed the President of the Tribunal to refer the application for review to him for determination.
- 8 By way of order dated 18 March 2024 the President of the Tribunal referred the application for review to the Hon. Minister for Planning for determination.
- 9 On 2 April 2024 the Hon. Amber-Jade Sanderson MLA (Minister for Health and Mental Health) wrote to Ruah's legal representative in this review, Mr Martin Flint of Flint Legal, advising that the Hon. Minister for Planning has 'transferred to me his powers and functions to consider and determine' the application for review.

- 10 These submissions are in response to the Hon. Amber-Jade Sanderson MLA's invitation to the parties to make written submissions by 5pm Monday 22 April 2024.

Ruah

- 11 Ruah was founded in 1959 by the Daughters of Charity – an order of nuns founded by St Vincent de Paul in Europe. A group of four courageous Sisters set up Perth's first soup kitchen on the site of 29-35 Shenton Street and Perth's first women's shelter and first Aboriginal women's refuge.
- 12 By the 1990s, the foundation of Ruah as a modern, professional organisation was taking shape. The Sisters established a public company – Daughters of Charity Services WA Ltd – and began handing over their operations to a lay management team. Professional staff were employed to develop an integrated therapeutic model to tackle the complex problems for vulnerable Western Australians and their families.
- 13 In 2009, after 50 years in Perth, the Daughters of Charity officially relinquished control of the not-for-profit company and the organisation changed its name to Ruah Community Services. This severed formal ties with the Catholic Church and completed the transition to an independent entity. The De Paul Centre, which started out as the original soup kitchen, was renamed the Ruah Centre. It launched a progressive new model to fill emerging gaps in services for people experiencing homelessness, including a new generation of young people struggling with drug addiction. The long-established women's refuge at Ave Maria House, now Harmony Place, was brought under the new corporate umbrella, along with Anawim, the first shelter for Aboriginal women in WA, now Kambarang Place.
- 14 In 2019, Ruah Community Services merged with the Mental Health Law Centre – the first merger of its kind in Western Australia – to provide even more comprehensive services for vulnerable people. In 2020, Ruah expanded its legal services to include care and protection services and other support for people with whom it works, under the broader banner of Ruah Legal Services.
- 15 Today, Ruah is an independent, not-for-profit organisation lead by a very experienced Board and Executive. Ruah is "Walking with you", but never loses sight of the pioneering and courageous work its founders began. Social, economic, political and cultural circumstances change, but what has lived on from decade-to-decade is the drive to make a difference for people who are vulnerable, disadvantaged and discriminated against.

- 16 Ruah continues the tradition of its founders, particularly when it comes to innovation. Ruah’s work is benchmarked through several different accreditation and quality assurance processes, and through sector awarded programs where its work addressing the complex issues of homelessness has been well-recognised for setting new standards in industry best practice.
- 17 Ruah is driven to make a difference for people who are vulnerable, disadvantaged and discriminated against. Its service areas include mental health, peer support, family & domestic violence, and legal support. In addition to these, housing and homelessness services is also one of its core areas, supporting a range of programs as detailed below:



- 18 Across its service areas, Ruah delivered high quality wrap around supports to more than 10,700 people last year, with legal services being provided to an additional more than 1,500 people last year. Its model of care recognises the universality that underpins all human needs and operates through a ‘no wrong door’ approach. Whichever pathway people enter Ruah’s services they can access the support they need when they need it and for as long as they need it.
- 19 Ruah’s capacity to help change the lives of the people it works with is underpinned by strong corporate and clinical governance frameworks and processes that are robust and authentic – built from supporting people at a grassroots level and accredited against the National Safety and Quality Health

Service (**NSQHS**) Standards and National Standards for Mental Health Services. Ruah is also Rainbow Tick accredited.

- 20 Ruah has a robust Quality Assurance system in place that will ensure compliance with all Quality Assurance requirements. Organisational and strategic risks are monitored by a Governance Team, reporting to senior leadership and Ruah's Board through a Risk and Quality Committee (comprised of Executive and Managers) that meets regularly (at least every six weeks), and a Finance & Audit Committee (comprised of Ruah Directors, CFO and CEO) which meets monthly.

East Perth SNS

- 21 Ruah operated the East Perth SNS as a pilot from 31 May 2021 to 29 November 2023.
- 22 The purpose of the East Perth SNS was the same as for the Northbridge SNS, i.e. the provision of an overnight service responding to the urgent need for a safe and culturally secure night space for women sleeping rough in Perth.
- 23 Two year (31 May 2021 to 31 May 2023) one-off funding was provided by the City for the East Perth SNS to ascertain if the service is valuable, feasible and has the desired impact. The funding was extended for a 6-month period from 1 June 2023 to 29 November 2023.
- 24 The SNS service model on which the operation of the East Perth SNS was based was assessed against the NSQHS Standards and met all criteria with no recommendations.
- 25 The East Perth SNS was successful and Ruah is of the firm view that there is a clear need for the continuation of a SNS service within the City. These views are shared by others as evidenced by the State (through the Department of Communities) committing 2 years of funding for the Northbridge SNS.
- 26 Additionally, the operation of the East Perth SNS provided Ruah with valuable learnings regarding operational issues from which to build on in designing the Northbridge SNS. Those matters include:
- 26.1 Catering to the complex needs of individuals, including issues of mental health, domestic violence, and substance abuse.
- 26.2 The unpredictability in client intake due to the unscheduled attendance of clients brought by police.

- 26.3 The management of client belongings, including being left unattended, raising storage concerns.
- 26.4 Incidents requiring medical assistance, and managing aggression and substance presence.
- 26.5 Clients sleeping rough, who have nowhere safe to go during the day, and clients planning for their night & presenting to the SNS before opening.
- 26.6 The safety and wellbeing of the group of clients staying overnight at the premises.

The *above* matters were addressed through staff training, service model adjustments, and stakeholder collaboration.

Northbridge SNS

Purpose

- 27 The Northbridge SNS will provide a critical response to the immediate safety needs of women fleeing family domestic violence and will be Perth's only low barrier safe space for women. The Northbridge SNS will accommodate women who walk in at a point of crisis, and women can be referred from the Western Australia Police Force (**WAPOL**), City rangers, hospitals, other specialist homelessness services, and other community services. The Northbridge SNS will also provide a linkage to specialist services including supports with family domestic violence, primary health care, mental health, alcohol and other drugs (**AOD**), and housing supports.

Service imperative

- 28 The Northbridge SNS will be Western Australia's only low-barrier night service dedicated to women in crisis.
- 29 The Northbridge SNS will support women experiencing rough sleeping who are often also escaping family and domestic violence (**FDV**), in mental health crisis, and are navigating AOD issues.
- 30 Operating 365 nights a year, the Northbridge SNS will not only offer immediate shelter but also will extend a spectrum of essential services ranging from linkage with case management to healthcare linkages and supports.

- 31 The Northbridge SNS will be operated by Ruah's Housing & Homelessness team, in close working with Perth homelessness, health and crisis service providers.
- 32 The Northbridge SNS will work in a "housing first" system connecting women with suitable housing options as soon as they become available.
- 33 Ruah will provide strong clinical governance and additional oversight of this high risk¹ service. As noted *above*², the SNS service model on which the operation of the East Perth SNS was based was assessed against the NSQHS Standards and met all criteria with no recommendations. As the service model on which the operation of the Northbridge SNS will be based is functionally the same as that which the operation of the East Perth SNS was based on, the same accreditation will apply to the Northbridge SNS. The other service provided by Ruah from 247-249 James Street, being the engagement hub³, is also accredited against the NSQHS Standards.
- 34 The 2.5 year pilot East Perth SNS having concluded on 29 November 2023, the increasing demand for safe spaces underscores the pivotal role of the Northbridge SNS in addressing the multifaceted challenges faced by women in crisis and highlight its importance.
- 35 In a climate of escalating FDV homicides and assaults coupled with accommodation shortages, the Northbridge SNS is needed.

Operational overview

- 36 The Northbridge SNS will be an overnight service responding to the urgent need for a safe and culturally secure night space for women sleeping rough in Perth.
- 37 The Northbridge SNS will be a space where vulnerable people can go to rest and seek informal support. The space will not provide beds, but will have comfortable spaces for rest and sleep. While attending the Northbridge SNS, women will receive basic assistance, such as access to clothing, toiletries, tea and coffee, device chargers, and shower facilities. Northbridge SNS staff will

¹ In this context, 'high risk' relates to client complexity – clients of the Northbridge SNS are likely to often experience vulnerability in the areas of safety, FDV and mental health, and be at risk of homelessness. These women are at 'high risk' of falling through the system and at risk of harm to themselves, of experiencing harm from violence, and of the morbidity/mortality that comes from being on the streets. These clients also often present with a high risk of being unwell from mental health issues and AOD use.

² See [24] *above*.

³ See footnote 4 *below*.

provide emotional support as well as advice and information about services the women can connect into for support to access accommodation.



- 38 While not a long-term solution, the Northbridge SNS will provide a basic shelter and safety for people who are sleeping rough to decrease the risk of further physical and psychological trauma that may be experienced while sleeping rough. The significant increase in FDV provides a strong rationale for the operation of the Northbridge SNS.
- 39 The Northbridge SNS will be accessible to women from 7pm to 7am, 365 days per year, and has capacity for 30 women a night, including places for self-presentations and emergency placements from WAPOL, City rangers, hospitals, other specialist homelessness services, and other community services.
- 40 Security will be on each night with two security workers on at all times.
- 41 Women who self-present or attend through an emergency referral are encouraged to attend a day centre for an ongoing referral to secure their space for additional nights. The purpose of this is to begin the planning for more suitable safety and accommodation options through encouraging continued engagement with the day centres⁴ to further their opportunities for housing and connection to specialist services.
- 42 Women who will access the Northbridge SNS include chronically street-present women (rough sleepers), women escaping FDV who would otherwise face being forced onto the streets or returning to the perpetrator, and women awaiting placement in transitional or long-term accommodation. The Northbridge SNS will provide an emergency overnight space for those who have no other accommodation options and who would otherwise be rough sleeping in the Perth central business district. Women who are forced to sleep rough are especially vulnerable to sexual and physical violence, health

⁴ In Perth these are the engagement hub run by Ruah at 247-249 James Street and Tranby run by Uniting WA. These day centres are walk-in services for people at risk of, or experiencing, homelessness. They provide essential services such as showers, advice, emergency relief, and referrals and connection into specialist services. Other visiting services (e.g. nursing, laundry, Centrelink etc.) also attend day centres. Day centres act as a hub and place of connection for people needing a range of homelessness supports.

issues caused by exposure to the elements, substance abuse and increased mental health challenges. For every night a safe space is provided, their safety has been assured.

- 43 The Northbridge SNS will operate with a low barrier approach, placing minimal demands on the people who use the services, without attempting to control their life choices. The Northbridge SNS will use harm minimisation strategies and support the women to engage with further services and supports when requested. A low barrier approach is supported by the understanding that many of the people seeking support from the Northbridge SNS will have experienced significant adversity and journeyed through ongoing challenges in life.
- 44 The Northbridge SNS will also be connected to the state-wide By-Name List⁵, which enables organisations across the homelessness sector to collaboratively track and support people experiencing homelessness, and supports the allocation of housing and resources to the most vulnerable people as a priority. If people present to the Northbridge SNS and are not listed on the By-Name List, workers will explain what the list is and its purpose, and, if people consent, workers add them into the system.

Learnings from the operation of the East Perth SNS

- 45 It is anticipated that the issues experienced in the operation of the East Perth SNS⁶ will arise in the operation of the Northbridge SNS. Comprehensive strategies have been incorporated into the Operational Management Plan (OMP) dated 4 March 2024 (**OMP dated 4 March 2024**)⁷ to deal with these issues, including always-on security presence to ensure adherence to safety procedures, establishment of a process for managing complaints in line with Ruah's Complaints Management Policy & Procedure, and structured client registration and incident management policies to uphold safety and respect.

Service principles

- 46 Ruah is highly experienced in managing crisis settings, which is different from delivering more controlled support in other AOD service settings. Crisis services must be flexible, able to respond in the moment and deal with a fluid and changing environment. Ruah clients report that they feel safe using the

⁵ A real time detailed registry of individuals experiencing homelessness within a specific area that is essential for co-ordinated community responses.

⁶ See [26] above.

⁷ The OMP dated 4 March 2024 forms part of the application for review at Attachment 4.

engagement hub at 247-249 James Street (previously operated from 29-35 Shenton Street, Northbridge) and the East Perth SNS.

- 47 The SNS model works for clients through a shared staffing model across Ruah. The Northbridge SNS staff will work across both the engagement hub and often the After Hours Support Service⁸. This will provide high levels of trust in the team and promote strong linkage leading to permanent housing options for the people Ruah supports.
- 48 Ruah's practical working principles and those applicable to the Northbridge SNS are outlined below.



Immediate: The Northbridge SNS will provide immediate support when women need it. The response will meet people where they are in that moment of engagement and ensure that their immediate needs are met first.

No Wrong Door: The Northbridge SNS will provide a true 'no wrong door' approach which means that there are many avenues into the Northbridge SNS and that there is a low barrier to engagement and entry. No wrong door must also mean there is something behind the door - Ruah delivers a rich multidisciplinary service with strong linkages and referral pathways to partner services.

⁸ This service is designed to assist individuals who have recently secured housing, helping maintain their tenancies. Operating primarily in the afternoon and evening – when risks of tenancy failure are heightened – the service employs a team of health and community workers who visit clients at home. The service fills a crucial gap outside normal service hours, catering to clients with complex needs that require round-the-clock support. Additionally, the service offers telephone support to further assist clients.

Safe: The Northbridge SNS is designed so that the services will be delivered in a way that places safety at the centre. Safety includes physical safety, clinical safety, emotional safety and cultural safety.

Empowering: Women accessing the Northbridge SNS will be provided with choice regarding how they wish to engage. Staff will ‘do with’ rather than ‘do to’. Women will be empowered through immediate support, information, co-ordination and referral. Empowerment means providing choice and hope by working to build trust.

Respectful: The Northbridge SNS will respect diversity in all of its forms. The Northbridge SNS will be a non-judgemental and supportive environment where people are respected as the decision makers in their own lives.

Collaborative: The Northbridge SNS staff will work in collaboration with the clients and respect the autonomy of the clients.

The Approval

- 49 A detailed description of the use for which approval has been granted is set out *above*⁹. In very broad summary, the approval is for an overnight service responding to the urgent need for a safe and culturally secure night space for women sleeping rough in Perth.
- 50 The use the subject of the Approval is classified as ‘community centre’ within the use group category ‘Community and Cultural’ under the *City of Perth City Planning Scheme No.2 (CPS2)*.

247-249 James Street

- 51 247-249 James Street:
- 51.1 Is ‘portion of Perth Town Lot Y113 including Lot 1 on plan 1324’ and is all of the land comprised in Certificate of Title Volume 1106 Folio 252.
- 51.2 Is 507m² in area.
- 51.3 Contains a two-storey building fronting James Street and a single storey building to the rear.
- 51.4 Is the location from which Ruah’s engagement hub is operated.

⁹ Under the heading ‘**Northbridge SNS**’ from [27] – [48].

Locality

- 52 The locality can be defined as a mixed-use area with commercial uses (shops, offices, and restaurants) at ground level on both sides of James Street, and Special Residential (previously operated as the Best Western Hotel) and Residential Dwellings at the upper levels on the northern side of James Street. The Perth Police Station is located approximately 50 metres to the west of 247-249 James Street.

Planning framework

- 53 247-249 James Street is:
- 53.1 Zoned 'Central City Area' under the *Metropolitan Region Scheme*.
 - 53.2 Under *CPS2*, located within precinct 'P1 Northbridge (CC)' and the City Centre use area.
 - 53.3 Not listed by the Heritage Council of Western Australia and is not on the heritage list under *CPS2*.
 - 53.4 Not located within a bushfire prone area.
- 54 The Statement of Intent in 'Precinct Plan No. 1 – Northbridge' (**Precinct Plan**) contains the following:

The Northbridge Precinct will continue to evolve as a diverse, interesting and dynamic inner city precinct and will be promoted as an attractive destination for the local population and interstate and overseas visitors. This Precinct will remain Perth's primary entertainment and night life area and provide a variety of residential and visitor accommodation and commercial services. It will be a unique area in terms of uses and character and the social and cultural diversity that clearly distinguishes the Precinct will be fostered.

A mixture of compatible, complementary activities is essential to maintain the diversity of activity in this Precinct. East of Russell Square, entertainment activities will predominate. However, a rich mix of other commercial uses, including short stay accommodation such as hotels and serviced apartments will be encouraged. The remainder of the Precinct, generally west of Russell Square, will have a residential emphasis, accommodating a variety of residential dwellings, visitor accommodation and other compatible non-residential uses. Mixed residential and commercial developments will be encouraged throughout the Precinct to strengthen its residential component, as well as create employment opportunities. The design of residential and mixed use developments will take into account the need for residential and non-residential uses to coexist in the Precinct, and therefore the need to

minimise conflict between the uses. The uses which characterise Northbridge will be encouraged to extend along William Street.

55 The section titled 'Uses' in the Precinct Plan contains the following:

(b) *West of Milligan, Parker and Palmerston Streets a greater residential component, accommodating a variety of residential and visitor accommodation and other compatible non-residential uses, including small local shops, community facilities, recreational uses, restaurants, coffee shops, medical consulting rooms, service industries and small showrooms and workshops will be supported. (underlining added)*

Purpose of the review and the scope of relevant considerations

56 'The purpose of the review is to produce the correct and preferable decision at the time of the decision upon the review'.¹⁰

57 In determining this review 'the Minister is not limited to planning considerations but may make the determination having regard to any other matter affecting the public interest'¹¹.

The outcomes sought by Ruah

58 The outcomes in this review sought by Ruah are set out in the application for review¹², with the addition of two further matters¹³. In total the outcomes sought by Ruah are as follows.

Condition 2 of the Approval

59 Condition 2 provides as follows:

The Safe Night Space for Women having a limited approval period of 30 months from the date of this determination, after which time the use must cease to the satisfaction of the City.

60 In the application for review Ruah sought that condition 2 be amended by deleting ', after which time the use must cease to the satisfaction of the City'.

61 In addition to the amendment to condition 2 sought in the application for review, Ruah seeks that the 30 month period be from the date of the determination of this review.

¹⁰ Section 27(2) of the *State Administrative Tribunal Act 2004*.

¹¹ Section 247(1) of the Act.

¹² See paragraph 8 of the document titled '**Background, orders sought and grounds of review**'.

¹³ See [61] and [69] *below*.

62 The effect of the two amendments sought is condition 2 being amended to read as follows:

The Safe Night Space for Women having a limited approval of 30 months from ## [the date of determination of the review].

Condition 3 of the Approval

63 Condition 3 of the Approval provides as follows:

Prior to the commencement of the Safe Night Space, an updated Operational Management Plan, that includes:

- a. a provision to require the presence of one (1) security personnel to be positioned external to the building at all times the Safe Night Space is operational; and*
- b. specific provisions to engage with the Northbridge Neighbourhood Group on a regular basis to discuss any potential issues relating to the provision of the Safe Night Space and measures to resolve those issues*

must be submitted to and approved by the City. The Safe Night Space being managed and operated in accordance with the approved Operational Management Plan at all times to the satisfaction of the City.

64 The OMP referred to in condition 3 of the Approval is the version which was before the Council of the City at its meeting on 27 February 2024¹⁴ and is dated 23 January 2024 (**OMP dated 23 January 2024**).

65 Ruah seeks that condition 3 of the Approval be replaced with the following worded condition:

The Safe Night Space for Women being managed and operated at all times in accordance with the attached Operational Management Plan dated 4 March 2024.

¹⁴ See Attachment 2.

Condition 4 of the Approval

66 Condition 4 of the Approval provides as follows:

Prior to the commencement of the Safe Night Space, an updated Waste Management Plan shall be submitted to and approved by the City providing the following:

- a. Specify what measures are being taken to mitigate the disposal of illegal items.*
- b. Specify what measures are being taken to mitigate biohazard items.*

with the approved Waste Management Plan being implemented at all times by the operator/manager, to the satisfaction of the City.

67 It is understood that the Waste Management Plan (**WMP**) referred to in condition 4 of the Approval is a reference to the WMP dated 22 December 2022 (**WMP dated 22 December 2022**)¹⁵.

68 Ruah seeks that condition 4 of the Approval be replaced with the following worded condition:

The attached Waste Management Plan dated 22 December 2022 being implemented at all times.

Additional condition sought by Ruah

69 Ruah seeks the following be added as condition 5 of the Approval:

This approval is personal to Ruah Community Services Ltd and does not run with the land.

Law relating to validity of conditions – uncertainty and lack of finality

70 It will be apparent from a review of the application for review¹⁶ that, amongst other matters, Ruah's submission is that aspects of conditions 2-4 are invalid by reason of uncertainty and lack of finality.

71 It is therefore appropriate to briefly review the law relating to the invalidity of conditions of planning approval for reasons of uncertainty and lack of finality.

¹⁵ See the application for review at Attachment 4.

¹⁶ See specifically paragraphs [10], [16], [18], [19], [22], [25] and [26] of the document '**Background, orders sought and grounds of review**' within the application for review at Attachment 4.

- 72 It can be simply put that it is accepted law that planning conditions must be certain and final.
- 73 It is instructive for the purpose of this review to refer to the following extract from Dr Stephen Willey's *Planning and Environmental Law in Western Australia*¹⁷ (footnotes omitted):

The classic example of an uncertain condition resulting in a lack of finality is Mison v. Randwick Municipal Council. In Mison, a development for a two-storey dwelling was approved subject to conditions, which included the following:

Overall height of the dwelling-house being reduced to the satisfaction of Council's chief town planner.

The NSW Court of Appeal found that the condition lacked finality because it was not apparent from the face of the condition how much the height of the building needed to be reduced. That uncertainty left open the possibility that the approved development would be significantly different from that which was applied for. Priestley JA stated:

In my opinion, if a condition imposed on a purported consent to a particular development application has the effect of significantly altering the development in respect of which the application is made, then the consent is not a consent to the application.

Clarke JA stated:

Where a consent leaves for later decision an important aspect of the development and the decision on that aspect could alter the proposed development in a fundamental respect it is difficult to see how that consent could be regarded as final.¹⁸

The citation for *Mison v. Randwick Municipal Council* is *Mison v. Randwick Municipal Council* (1991) 73 LGRA 349 (***Mison***).

Submissions in respect of the outcomes sought by Ruah

Condition 2 of the Approval

- 74 There are four submissions in support of the outcome Ruah seeks in respect of condition 2.

¹⁷ Lawbook Co., 2021.

¹⁸ [13.360] on page 336.

First submission

- 75 The words 'after which time the use must cease' are redundant. It is otherwise clear from condition 2 that upon the cessation of 30 months from the grant of the Approval, the Northbridge SNS no longer has approval to operate and therefore must cease unless further a further approval is obtained.
- 76 With the deletion of the words 'after which time the use must cease', the words 'to the satisfaction of the City' no longer serve any purpose and should be deleted as well.

Second submission

- 77 If the first submission *above* is not accepted, *Mison* is applicable and the words 'to the satisfaction of the City' mean that condition 2 is invalid for reasons of uncertainty and lacking finality.
- 78 The words 'to the satisfaction of the City' result in condition 2 being uncertain and lacking finality because:
- 78.1 They have the effect that at the time of the Approval being granted what constitutes the cessation of the use is not certain.
- 78.2 They have the effect that at the time of the Approval being granted what constitutes the cessation of the use is subject to a future determination by the City.
- 78.3 The aspect of the Approval which is uncertain and lacking finality, being when the use is to cease, is an aspect of the Approval that could alter the Approval in a fundamental respect, i.e. how long the Approval is operative for.

Third submission

- 79 In any event, with respect to the words 'to the satisfaction of the City', whether the use has ceased is a simple, objective concept and is not dependent on the opinion, 'or satisfaction', of the City. Either the use has ceased or it has not, irrespective of the opinion, 'or satisfaction', of the City.

Fourth submission

- 80 Given the period of time that will have lapsed between the date of the Approval and the date of determination of this review, the correct and

preferable decision is for the Approval to be valid for 30 months from the date of determination of this review.

Condition 3 of the Approval

81 There are seven submissions in support of the outcome Ruah seeks in respect of condition 3.

First submission

82 The OMP referred to in condition 3 is that dated 23 January 2024.

83 The OMP dated 4 March 2024 appropriately deals with all necessary operational measures in respect of the Northbridge SNS and the correct and preferable decision is that it be the subject of condition 3 in place of the OMP dated 23 January 2024.

84 The OMP dated 4 March 2024 contains a number of amendments to the OMP dated 23 January 2024. Therefore, the question of what should be the form of the OMP the subject of condition 3 comes down to which, if any, of the changes to the OMP dated 23 January 2024 that are reflected in the OMP dated 4 March 2024 should be made.

85 To assist the process, Ruah has prepared a document identifying all the textual changes to the OMP dated 23 January 2024 that are contained in the OMP dated 4 March 2024 and the rationale for each change.

Attached hereto and marked 'Attachment 5' is the document identifying all the textual changes to the OMP dated 23 January 2024 that are contained in the OMP dated 4 March 2024 and the rationale for each change.

86 In addition to the rationales identified in Attachment 5, the following observations apply to the changes to the OMP dated 23 January 2024 that are reflected in the OMP dated 4 March 2024:

86.1 They are based on operational feedback from recent community engagement, from discussion with the City, and from experience and reflections in operating the East Perth SNS.

86.2 Each change aims to refine the OMP based on practical experience, aligning service delivery with evolving needs and stakeholder feedback.

86.3 They are an improvement in clarity, service responsiveness, safety protocols, and community engagement strategies.

- 86.4 Underscore a shift towards a more dynamic and adaptable service model, as evidenced by the East Perth SNS's operational data.
- 86.5 Real-time adjustment to service provision is now built into the OMP dated 4 March 2024 to reflect the dynamic needs of the Northbridge SNS clients.
- 86.6 The OMP dated 4 March 2024 reflects a clear strategic approach to past and anticipated concerns, and is designed to address concerns proactively, ensuring that the Northbridge SNS operates effectively within the community context.
- 86.7 The operations of the Northbridge SNS will be aligned with community expectations, NSQHS accreditation, legislative requirements, and best practice service delivery models.
- 87 The correct and preferable decision is for the OMP dated 4 March 2024 to be the subject of condition 3.

Second submission

- 88 There is no need for the OMP to include 'a provision to require the presence of one (1) security personnel to be positioned external to the building at all times the Safe Night Space is operational'.
- 89 Security, including the management of behaviour, is appropriately and thoroughly dealt with in the OMP dated 4 March 2024. For example, in the context of the exterior of the building:
- a) 'When not actively working with clients or supporting the service, at times when only surveillance is required security staff are strategically positioned inside the hub's entrance, allowing for a clear view of the building's front and immediate surroundings.'¹⁹
 - b) 'Ruah alerts City Rangers for any issues in the surrounding areas and engages police assistance for any illegal activities.'²⁰
 - c) 'Security personnel conduct hourly checks inside, outside, and around the sides of the building as a core part of their duties, and are responsible for reporting any illegal activity to the police.'²¹

¹⁹ Page 8 of the OMP dated 4 March 2024 within the application for review at Attachment 4.

²⁰ Page 10 of the OMP dated 4 March 2024 within the application for review at Attachment 4.

²¹ Page 12 of the OMP dated 4 March 2024 within the application for review at Attachment 4.

- d) 'Monitoring and Patrols – Security staff are tasked with monitoring client behaviour both within and external to the premises, conducting regular patrols to maintain order and address any potential disturbances.'²²
 - e) 'CCTV cameras cover all main internal areas and the externally (sic) areas adjacent to the building.'²³
 - f) 'We have recently installed additional lighting to further increase visibility and therefore increase safety around the area'.²⁴
- 90 'The Safe Night Space (SNS) service includes a mechanism specifically designed for addressing community concerns related to the service during its operational hours. This system enables the community to alert SNS staff via text about situations such as a perpetrator outside the building or any other service-related issues. Upon receipt of such alerts, the staff will assess the situation to decide whether the involvement of Police or City Rangers is warranted. A designated phone line is established to receive these text messages, ensuring that community concerns are promptly addressed.'²⁵

Third submission

- 91 Condition 3 is uncertain insofar as it refers to the 'Northbridge Neighbourhood Group'. Who or what the 'Northbridge Neighbourhood Group' is, is unknown and not defined in condition 3.

Fourth submission

- 92 There is no need for the OMP to include 'specific provisions to engage with the Northbridge Neighbourhood Group on a regular basis to discuss any potential issues relating to the provision of the Safe Night Space and measures to resolve those issues'.
- 93 Community complaints, feedback and engagement are appropriately and thoroughly dealt with in the OMP dated 4 March 2024. For example:
- a) 'Complaints Policy and Procedures: Our policy outlines the specific steps to be followed when a complaint is lodged. It defines the process for escalating issues and ensures that every complaint is given due attention.'²⁶

²² Page 12 of the OMP dated 4 March 2024 within the application for review at Attachment 4.

²³ Page 14 of the OMP dated 4 March 2024 within the application for review at Attachment 4.

²⁴ Page 17 of the OMP dated 4 March 2024 within the application for review at Attachment 4.

²⁵ Pages 17 and 18 of the OMP dated 4 March 2024 within the application for review at Attachment 4.

²⁶ Page 12 of the OMP dated 4 March 2024 within the application for review at Attachment 4.

b) 'As part of operating this facility we take in complaints as part of the quality improvement process. Listening and early communication is key to resolving concerns with ... neighbours, and the community. Complaints (which could be in connection to a client or the services that Ruah provides) can be made via the feedback form via the website, calling 13 RUAH (who will direct the complaint to the appropriate service/area), or emailing connecting@ruah.org.au or feedback@ruah.org.au.'²⁷

c) '**Feedback Evaluation:** Upon receiving the community's insights, suggestions, or observations, Ruah undertakes a careful evaluation to determine how this feedback might inform service adjustments...

Service Adaptation: If the assessment of feedback reveals actionable opportunities, Ruah explores how the service can be altered or adapted. This process is conducted with the aim of enhancing service outcomes, ensuring that any modifications are implemented thoughtfully and strategically to benefit the community and service objectives.'²⁸

d) 'Ruah have established the Community Advisory Group for James St, appointing Ms. Liz MacLeod as the group's independent chair. The Community Advisory Group serves as an advisory body to Ruah's Chief Executive, facilitating open discussions and sharing insights to inform decisions regarding the SNS. The Community Reference (sic) Group will meet with the intention to achieve the following objectives:

...

- Provide a platform for addressing concerns or exploring opportunities identified by the broader community, aiming to devise creative and responsible solutions that align with the service's objectives.

...

- Focus on collective solution-finding to unblock difficulties, enhancing community outcomes and ensuring the delivery of the service aligns with the needs and positives outcomes for the community, clients, and the service itself ...
- Develop strategies to enhance the integration of the SNS and the James Street hub within the community, fostering stronger connections and collaboration.

²⁷ Page 15 of the OMP dated 4 March 2024 within the application for review at Attachment 4.

²⁸ Page 15 of the OMP dated 4 March 2024 within the application for review at Attachment 4.

... Members include ... City of Perth representatives, community and neighbour representatives ... The group conducts regular reviews of its composition to ensure alignment with service goals and community needs.

Members attend and participate in meetings, representing community views ...²⁹

Fifth submission

94 The required updating of the OMP and approval by the City mean that condition 3 is invalid for reasons of uncertainty and lacking finality.

95 The required updating of the OMP and approval by the City results in condition 3 being uncertain and lacking finality because:

95.1 They have the effect that at the time of the Approval being granted the content of the approved OMP is not certain.

95.2 They have the effect that at the time of the Approval being granted the content of the approved OMP is subject to a future determination by the City.

95.3 The aspect of the Approval which is uncertain and lacking finality, being the content of the approved OMP, is an aspect of the Approval that could alter the Approval in a fundamental respect. The approved OMP will be the key document for the operation of the Northbridge SNS and effectively defines and circumscribes the use.

Sixth submission

96 *Mison* is applicable to the words 'to the satisfaction of the City', with the result that condition 3 is invalid for reasons of uncertainty and lacking finality.

97 The words 'to the satisfaction of the City' result in condition 3 being uncertain and lacking finality because:

97.1 They have the effect that at the time of the Approval being granted what constitutes compliance with the approved OMP is not certain.

97.2 They have the effect that at the time of the Approval being granted what constitutes compliance with the approved OMP is subject to a future determination of the City.

²⁹ Pages 16 and 17 of the OMP dated 4 March 2024 within the application for review at Attachment 4.

- 97.3 The aspect of the Approval which is uncertain and lacking finality, i.e. what constitutes the Northbridge SNS being managed and operated in accordance with the approved OMP, is an aspect of the Approval that could alter the Approval in a fundamental respect. It goes to the interpretation of the approved OMP, which itself is the key document for the operation of the Northbridge SNS and effectively defines and circumscribes the use, and is linked to the issue of enforcement.
- 98 This aspect of the wording of condition 3 ('to the satisfaction of the City') is very significant to the operation of the Northbridge SNS and, therefore, the public interest.
- 99 A failure to manage and operate the Northbridge SNS in accordance with the approved OMP will expose Ruah to enforcement action by the City under the Act. Enforcement action could take the form of a direction to stop the use³⁰ and/or a prosecution for undertaking the use not in compliance with a condition of the Approval³¹.
- 100 Concerns on the part of the Ruah regarding enforcement action are not idle speculation. In this regard it is relevant to note two matters:
- 100.1 The approval of the engagement hub operated by Ruah at 247-249 James Street is subject to compliance with an approved OMP.
- On a number of occasions there have been differing views expressed by stakeholders as to the meaning of elements of the approved OMP in the context of allegations that the use is not being carried on in compliance with the approved OMP.
- 100.2 There was much discussion regarding enforcement at the meeting of the Council of the City on 27 February 2024 when then the Approval was granted.³²
- 101 It is clear, as a matter of law and the public interest, that condition 3 must be certain and final. It must be clear to all stakeholders, particularly Ruah, as to the requirements to be met to enable the terms of the Approval to be met by Ruah. The issue cannot be left to the 'satisfaction of the City'.

³⁰ See section 214(2) of the Act.

³¹ Section 218(c) of the Act.

³² A recording of the meeting is at <https://www.youtube.com/watch?v=qCy1AVInVt0> and the consideration of this matter is from 37:57 to 1:04:12.

Seventh submission

- 102 In any event, management and operation of the use in accordance with the approved OMP is a simple, objective concept and is not dependent on the opinion, 'or satisfaction', of the City. Either the use has been managed and operated in accordance with the approved OMP or it has not, irrespective of the opinion, 'or satisfaction', of the City.

Condition 4 of the Approval

- 103 There are six submissions in support of the outcome Ruah seeks in respect of condition 4.

First submission

- 104 It is Ruah's understanding that the WMP referred to in condition 4 is the WMP dated 22 December 2022.
- 105 The OMP dated 4 March 2024 and the WMP dated 22 December 2022 appropriately deal with all necessary waste management measures in respect of the Northbridge SNS.

Second submission

- 106 Condition 4 lacks certainty as the meaning of the terms 'mitigate the disposal of illegal items' and 'mitigate biohazard items' is not known.

Third submission

- 107 There is no need for the WMP dated 22 December 2022 to be updated by specifying 'what measures are being taken to mitigate the disposal of illegal items'.
- 108 Leaving aside the issue of what 'mitigate the disposal of illegal items' means, the handling of illegal items is appropriately and thoroughly dealt with in the OMP dated 4 March 2024. For example:

'Handling of Illegal Items: Any illegal items found are promptly surrendered to WAPOL, aligning with our commitment to safety and legality.'³³

³³ Page 10 of the OMP dated 4 March 2024 within the application for review at Attachment 4.

Fourth submission

- 109 There is no need for WMP dated 22 December 2022 to be updated by specifying ‘what measures are being taken to mitigate biohazard items’.
- 110 Leaving aside the issue of what ‘mitigate biohazard items’ means, the management of biohazards is appropriately and thoroughly dealt with in the *attached* OMP. For example:
- a) ‘Security will conduct hourly patrols as part of their shift schedule, covering the ... external side of the building, and the area directly outside the front of the building, ensuring that any hazards are identified, removed, and properly disposed of.’³⁴
 - b) ‘Biohazard Management: On-site biohazard bins, focusing on sharps disposal, are maintained. Staff receive extensive training in the safe handling of sharps and biohazardous waste.’³⁵
 - c) ‘Staff Training: Comprehensive training on biohazard management is provided, ensuring staff are well-equipped with knowledge on safe disposal practices and the use of PPE.’³⁶

Fifth submission

- 111 *Mison* is applicable to the words ‘to the satisfaction of the City’, with the result that condition 4 is invalid for reasons of uncertainty and lacking finality.
- 112 The words ‘to the satisfaction of the City’ result in condition 4 being uncertain and lacking finality because:
- 112.1 They have the effect that at the time of the Approval being granted what constitutes compliance with the approved WMP is not certain.
 - 112.2 They have the effect that at the time of the Approval being granted what constitutes compliance with the approved WMP is subject to a future determination of the City.
 - 112.3 The aspect of the Approval which is uncertain and lacking finality, i.e. what constitutes implementation of the approved WMP, is a critical aspect of the Approval as it goes to the interpretation of the approved WMP and, significantly, is linked to the issue of enforcement.

³⁴ Page 8 of the OMP dated 4 March 2024 within the application for review at Attachment 4.

³⁵ Page 10 of the OMP dated 4 March 2024 within the application for review at Attachment 4.

³⁶ Page 10 of the OMP dated 4 March 2024 within the application for review at Attachment 4.

113 The submission *above*³⁷ in respect of condition 3 applies equally to the words 'to the satisfaction of the City' in condition 4.

Sixth submission

114 In any event, implementation of the approved WMP is a simple, objective concept and is not dependent on the opinion, 'or satisfaction', of the City. Either the WMP has been implemented or it has not, irrespective of the opinion, 'or satisfaction', of the City.

Additional condition sought

115 Unless appropriately conditioned, planning approvals run with the land and are not personal.

116 However, given that the operation of the Northbridge SNS will be undertaken by SNS and that the Approval is time limited, it is appropriate that the Approval be personal to Ruah and not run with the land.³⁸

Conclusion

117 Ruah requests that the conditions of the Approval be modified as set out *above*.³⁹



For Flint Legal
Solicitors for the Applicant

³⁷ See [98]-[101].

³⁸ As to an example of a planning approval where the approval was conditional to the applicant and did not run with the land, see *West Australian Shalom Group Inc. and City of Swan* [2019] WASAT 80 at [211].

³⁹ See [62], [65], [68] and [69].

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ABN - 32 603 168 850

Our Ref: J000470

11 December 2023

Ms Julia Kingsbury
Development Approvals
City of Perth
GPO Box C120
PERTH WA 6839

Dear Julia

247-249 (PERTH TOWN LOT Y113, LOT 1 AND Y112) JAMES STREET, NORTHBRIDGE – SAFE NIGHT SPACE FOR WOMEN

PTS Town Planning Pty Ltd is pleased to submit this application for the use of the building temporarily as a safe night space for women.

In accordance with the City of Perth's requirements please find enclosed:

- A completed City of Perth Application Form.
- A completed MRS Form 1.
- Executed landowner authorization.
- A copy of the site and floor plan.
- A copy of the Certificates of title.
- Operational Management Plan.

Subject Site

The subject site is Perth Town Lot Y113 and Lot 1 (247) James Street, Northbridge contained on Certificate of Title Volume 1106 Folio 252. The land is owned by Sawasdee Pty Ltd.

We have also included Lot Y112 contained on Certificate of Title Volume 1106 Folio 252 as this lot is used for car parking and waste storage. There is no change to the building or use on Lot Y112. The land is also owned by Sawasdee Pty Ltd.

The site is not located within a bushfire prone area.

The site is not heritage listed.

The site is zoned City Centre under the Metropolitan Region Scheme (MRS).

The site is in the City Centre use area under City Planning Scheme No. 2 (CPS2) and located within the Northbridge Precinct (P1).

Background

The Minister for Planning on 21 September 2022 under sections 246 and 247 of the *Planning and Development Act 2005* approved the use of the subject site for a Community Centre. The community centre is used by Ruah for its Engagement Hub which assists people experiencing homelessness to rest, refresh and access specialist support services. This is a permanent use approval of the building.

The Minister's approval was subject to 8 conditions including Condition 3 which limited the hours of operation from 8:30am to 2pm Monday to Friday, Condition 4 which required a Business Management Plan, Condition 6 relating to external lighting, Condition 7 requiring a waste management plan and Condition 8 in relation to signage. The conditions were cleared, and the Ruah Engagement Hub has been operating on the site.

With respect to the safe night space for women, we note that the City of Perth provided the Rod Evans Community Centre in East Perth for Ruah to operate the Safe Night Space for Women from the site for the last 2 and a half years (finished on 30 November 2023). We understand that the City considered that the Safe Night Space for Women fell within the use of the Rod Evans Community Centre as a community centre.

We also note that the City of Perth prepared an amendment to CPS2 to provide Community and Cultural as a contemplated use rather than the current preferred use. The amendment was not approval by the Minister.

Proposed Application

The proposed development does not involve any external works and any internal works are exempt under Clause 61(1)(a) of the Deemed Provisions. We note that no internal works are currently proposed.

The application seeks to change the parameters of the approved community centre to enable the use of the building as a safe night space for women. The safe night space for women is seeking a temporary 30 month approval. The temporary approval is proposed given that new facilities and services will come online within this period meaning that the service will likely no longer be required from the subject site.

The Ruah Engagement Hub will continue to operate on the site between 8:30am and 2pm Monday to Friday. The Engagement Hub is a permanent use of the building.

The safe night space for women will operate between the hours of 7pm and 7am seven days a week (staff will be on site from 6:30pm to 7:30am). The Safe Night Space is a place where women can rest and connect to support services. The safe night space does not provide beds and the people using the space have access to basic services (laundry, toilets and a shower).

The service will have the capacity to support 30 women with two staff and 2 security persons. As identified in the City of Perth Agenda dated 28 February 2023 *'Over the twenty months from 31 May 2021 to 31 January 2023, the Safe Night Space has sheltered 709 individuals for a cumulative 7,966 instances of support (calculated by number of women multiplied by the number of nights each woman has stayed at the SNS). Although the capacity of the service is 25 women, averaged over the 611 days of this period, this equates to 13 women per night.'*

Planning Assessment

Land Use

The Minister for Planning on 21 September 2022 under sections 246 and 247 of the *Planning and Development Act 2005* approved the use of the subject site for a Community Centre (Ruah Engagement Hub).

We do not propose to repeat the consideration of the Minister with respect to the land use, however, we refer to the Minister's Decision in paragraphs 69 to 106 and that the proposed safe night space for women falls within the current approved use of community centre and 'Community and Cultural' use group category.

We understand that the City of Perth considers the use for the safe night space for women falls within the definition of a community centre as it provided the use of the Rod Evans Community Centre for the safe night space for women for the last 2 and a half years.

There is no change to the approved land use (community centre). This application is seeking to change the parameters of the use to accommodate the safe night space for women.

Community and Cultural is a 'P' preferred use under CPS2. Clause 32 of CPS2 identifies that:

'Where, in a precinct, a use group category is classified as a preferred use then, in considering an application involving a use from that category in that precinct, the local government -

(b) cannot otherwise refuse the application by reference to the proposal to begin or continue the preferred use.'

We note that the City of Perth Officers in the original assessment of the engagement hub and the Minister concurred that the application cannot be refused on planning grounds. We refer to paragraphs 115 to 122 of the Minister's Decision.

Management Plan

We have enclosed the operational management plan for the safe night space for women. Specifically, the management plan addresses matters previously raised by the City of Perth and the Minister with respect to the current engagement hub, including:

- The control of noise and other disturbances on the site that are associated with the activities or customers on site.
- The removal of unwanted or unattended personal belongings of customers of the site within the verge and footpath areas, directly in front of the property.
- Managing the congregation and queuing of customers outside the property.
- Establishing and maintaining a complaints management service, that enables and facilitates easy access (by the community) during the hours of operation to a designated contact person(s).

Car Parking

There is no change to the car parking on site as a result of this application and we note under the Perth Parking Policy there is no minimum requirement.

Waste Management

As part of the approval conditions for the Engagement Hub, a Waste Management Plan was required to be prepared. The WMP has been prepared and approved. The WMP identifies the waste demand based on floor area. As the floor area is not changing there is no need to amend the WMP.

Planning and Development (Local Planning Schemes) Regulations 2015

As identified above, we note that the Applicant, City of Perth Officers (as part of the original Engagement Hub assessment) and the Minister (as part of the original Engagement Hub assessment) concurred that the application cannot be refused on planning grounds.

Clause 67(2) provides matters to be given due regard in consideration of applications. We have addressed those matters relevant to the application.

The aims and provisions of this Scheme and any other local planning scheme operating within the Scheme area.

While it was identified previously that the aims of CPS2 are high level and not considered to have a strong or clear link to the proposal, Clause 6 of CPS 2 provides 'objectives and intentions of the Scheme'. Subclause (3)(a) - (c) identifies:

- a) *to recognise and reinforce the role of Perth as the capital of Western Australia and the administrative, financial and political centre of the State;*
- b) *to cater for the diversity of demands, interests and lifestyles by facilitating and encouraging the provision of a wide range of choices in housing, business, employment, education, leisure, visitor accommodation and attractions, transport and access opportunities;*
- c) *protect and enhance the health, safety and general welfare of the local government's inhabitants and the social, physical and cultural environment of the local government.*

The services provided by the safe night space for women are consistent with the objectives above as Northbridge forms part of Perth's Capital City, where people naturally congregate. The safe night space for women meets the diversity of demands as the service assists vulnerable people enhancing the safety and general welfare of the entire locality.

The Statement of Intent for Northbridge identifies:

The Northbridge Precinct will continue to evolve as a diverse, interesting and dynamic inner-city precinct and will be promoted as an attractive destination for the local population and interstate and overseas visitors. This Precinct will remain Perth's primary entertainment and night life area and provide a variety of residential and visitor accommodation and commercial services. It will be a unique area in terms of uses and character and the social and cultural diversity that clearly distinguishes the Precinct will be fostered.

The community centre currently exists and therefore forms part of the existing locality and existing service provision in the precinct.

The safe night space for women provides for a diverse, interesting and dynamic inner-city precinct in that the use provides an important community service in the area. The proposal provides an important social service by reducing the social problems linked with domestic violence.

The objectives contained in the City's planning framework cater for a diversity of demands and the enhancement of health and safety. This includes a range of social and cultural facilities and services. Schedule 3 of CPS 2 contemplates a range of entertainment, educational, healthcare, and community and cultural uses within the Northbridge Precinct. The Northbridge Precinct Plan seeks to locate compatible non-residential uses, such as 'community activities,' west of Milligan, Shenton and Palmerston streets.

Any policy of the State.

On 22 July 2020, the State Government launched a strategy to reduce family and domestic violence. *Path to Safety: Western Australia's Strategy to Reduce Family and Domestic Violence 2020-2030* sets out a whole-of-government and community plan for reducing and responding to this issue over the next decade.

This policy clearly seeks to act now to keep people safe including support and services for people experiencing domestic violence.

Any local planning strategy for this Scheme endorsed by the Commission.

The vision of the City of Perth Local Planning Strategy May 2023 is "A liveable, sustainable and prosperous city — this is our aspiration for Perth. We want our community to be as safe as possible, to be inclusive, active, vibrant and connected. We want to live in a healthy environment and we all want to be part of an economically successful, flourishing and thriving city." (Underline added)

Under Safe and Inclusive, the strategy identifies that 'Cities which offer safe environments and varied services and activities to a range of people across many demographics and cultures are successful in creating places where people of all walks of life choose to be.'

Other than the above, the Strategy provides little guidance in how the vision relevant to the provision of social services will be considered or delivered.

The compatibility of the development with its setting, including —

- (i) the compatibility of the development with the desired future character of its setting; and*
- (ii) the relationship of the development to development on adjoining land or on other land in the locality including, but not limited to, the likely effect of the height, bulk, scale, orientation and appearance of the development.*

The application does not propose any external alterations and therefore (ii) above is not relevant to the consideration of the application.

In terms of the compatibility of the development with the desired future character of its setting we note that the community centre is existing. The surrounding locality is characterised by a mix of land uses which includes the community centre, short stay and long stay dwellings, commercial uses and the Police Station. This also includes services that operate 24 hours a day.

The proposed safe night space for women is compatible with its surrounds, having regard to the established character of the locality. We also note that the approval is for the temporary use of the safe night space for 30 months.

The amenity of the locality including the following —

- (i) environmental impacts of the development;*
- (ii) the character of the locality;*
- (iii) social impacts of the development;*

We note that the community centre is existing in the locality and that there are a number of other service providers located nearby and form part of the existing character and amenity of the area (eg YouthLink WA, The Deen Clinic, Hepatitis WA, Sexual Health Quarters and Womens Health and Family Services).

Community services form an integral part of the fabric that underpins the amenity of the area surrounding the proposed site. This is reflected in the City's planning framework. The safe night space for women will be carefully managed in accordance with the operational management plan and will not detract to any significant degree from the present amenity of the area.

The existing centre is 50 metres from the Perth Police Station and therefore any impacts to public safety or antisocial behaviour can be addressed promptly.

As part of this application, we have enclosed an operational management plan that addresses:

- The control of noise and other disturbances on the site that are associated with the activities or customers on site.
- The removal of unwanted or unattended personal belongings of customers of the site within the verge and footpath areas, directly in front of the property.
- Managing the congregation and queuing of customers outside the property.
- Establishing and maintaining a complaints' management service, that enables and facilitates easy access (by the community) during the hours of operation to a designated contact person(s).

The safe night space for women will not significantly impact the existing amenity of the locality and the amenity concerns can be effectively managed.

The amount of traffic likely to be generated by the development, particularly in relation to the capacity of the road system in the locality and the probable effect on traffic flow and safety;

There is no change to the amount car parking provided on site and any increase in traffic will be negligible.

The availability and adequacy for the development of the following —

- (i) public transport services;*
- (ii) public utility services;*
- (iii) storage, management and collection of waste;*
- (iv) access for pedestrians and cyclists (including end of trip storage, toilet and shower facilities);*
- (v) access by older people and people with disability;*

The site has good access to public transport and access for pedestrians. A waste management plan has been prepared for the community centre.

The history of the site where the development is to be located.

The site is approved as a community centre. This application seeks to amend the parameters of the approved use to enable the safe night space for women for a temporary period of 30 months.

The impact of the development on the community as a whole notwithstanding the impact of the development on particular individuals.

In the Minister's Decision it was identified that *'Senior Member, Dr Stephen Willey in Planning and Environmental Law in Western Australia 2Q2V) at page 368 that clause 67(2)(x) of the deemed provisions likely includes questions of 'need' for a particular land use particularly where the use is for the public benefit. Dr Willey goes further to explain at page 370 that there are cases where a community or public need overrides considerations as to loss of amenity of the locality caused by a proposed development. This was the case of Pinder Architects Pty Ltd v City of Stirling [No 1] (1995) 15 SR (WA) 13. The TPAT was satisfied that there was a public need for the development, a hostel for Aboriginal patients from regional locations in order for them to receive medical treatment in Perth. Therefore, the TPAT approved the development, finding that the public need for the medical facility outweighed the possible local amenity impacts for nearby neighbours, including noise and impacts on property values.*

There is no doubt that there is a need for the service. This is acknowledged by the City of Perth, the State Government, and the community.

Conclusion

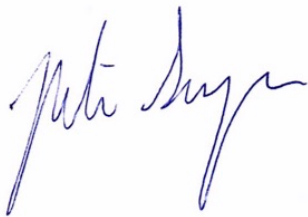
This application seeks to amend the parameters of the approved community centre to cater, on a temporary basis for 30 months, for the safe night space for women.

We look forward to your approval of this application. We note the previous commentary that the under CPS2 the application cannot be refused and the only matter for consideration is any conditions to be applied to the approval.

Should you have any questions or require any additional information, please do not hesitate to contact the undersigned on 0411 445 031 or peter@ptsplanning.com.au.

Yours sincerely

PTS Town Planning Pty Ltd



Peter Simpson
Director

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ABN 83 780 118 628



**CITY OF
PERTH**

Application for Development Approval

Planning and Development (Local Planning Scheme) Regulations 2015

Instructions: Please complete in full.

Note that two (2) separate application forms are required to be submitted for any Development Approval. In addition to this form, please obtain the up-to-date MRS Form 1 (Metropolitan Region Scheme) from the web at: [MRS Form 1 Application Form](#)

1. Owner Details

Full Name(s) (all owners)

Sawasdee Pty Ltd

ABN (if applicable)

78 782 561 064

Contact person for correspondence:

Address

Level 8, Golden Square, 32 St Georges Terrace, Perth

State

WA

Postcode

6000

Mobile

0411 880 721

Telephone (business)

Email

somkiatchanlong@gmail.com

Owners
Signature *[Handwritten Signature]*

Date
(DDMMYYYY)

07.12.2023

Owners
Signature *[Handwritten Signature]*

Date
(DDMMYYYY)

07.12.2023

The signature of the owner(s) is required on all applications. This application will not proceed without their signature. For the purposes of signing this application an owner includes the persons referred to in the Planning and Development (Local Planning Schemes) Regulations 2015 Schedule 2 clause 62(2).

2. Applicant Details (if different from owner)

Full Name

PTS Town Planning Pty Ltd

Contact person for correspondence:

Peter Simpson

Address

PO Box 538 Inglewood

State

WA

Postcode

6932

Mobile

0411 445 031

Telephone (business)

0411 445 031

Email

peter@ptsplanning.com.au

By ticking this box, I confirm that;

I, the applicant have obtained permission from the author and/or relevant right holders to reproduce, publish and distribute all documents and plans submitted for the purpose of my application.

I fully indemnify the City for any alleged breach of copyright relating to the documents submitted as a result of them being reproduced/published/distributed by the City in processing my application.

I consent to the application and accompanying material being subject to public advertising if required

Signature *[Handwritten Signature]*

Date
(DDMMYYYY)

8/12/23

3. Property Details

Street Number and Name

247 James Street, Northbridge

Lot No:

Lot Y113, Lot 1 and Y112

Location No:

Diagram or Plan No:

223022

Certificate of Title Vol. No:

1106/2017

Folio:

252/937

Suburb:

Northbridge

Nearest Street Intersection:

Fitzgerald Street

4. Proposed Development

Nature of Development:

- Works
- Demolition
- Change of Use (change to the parameters of the approved community centre and its hours of operation)
- Signage
- Works and Use

Is an exemption from development claimed for part of the development?

If yes, please detail what the exemption is for (if relevant)

Internal alterations

Description of proposed works and/or use:

Community centre - Ruah Engagement Hub (permanent) and Safe Night Space (approval for 30 months)

Nature of any existing buildings and/or land use

Community Centre (Ruah Engagement Hub)

Approximate cost of proposed development

\$0

Estimated time of completion (MM/YYYY)

4 months

5. Additional Information for Development Approval for Advertisements (Signs)

Note: To be completed in addition to the application for Development Approval form

Description of property on which advertisement is to be displayed including full details of its proposed position within the property:

Number of Signs

Note: Please complete the below for every sign proposed

Details of Proposed Sign:

Type of structure on which advertisement is to be erected (i.e. freestanding, wallmounted, other):

Height

Width

Depth

--	--	--

Colours to be used:

Materials to be used:

Height above ground level:

To top of advertisement:

To underside:

If the sign is illuminated, please state whether steady, moving, flashing, alternating, digital, animated, or scintillating and state intensity of light source:

8. Minor Development and Signs Application Checklist

Applicant declaration

- I understand that The City may require additional information to be provided before determining the application.
 - I understand that failure on my part to provide the required information specified in the checklist can result in the City not accepting my application.
 - I understand that documents that are required to be advertised under the provisions of *City of Perth City Planning Scheme No.2*, *City of Subiaco Town Planning Scheme No.4 (applicable to Crawley and Nedlands, transferred 1 July 2016)* and *City of Nedlands Town Planning Scheme No.2 (applicable to Nedlands, transferred 1 July 2016)* may be made publicly available and may be displayed on The City's website.
- Completed Application for Development Approval (Local Planning Scheme)
- The form must be signed by the owner(s). An owner who is:
 - (a) If the land is freehold land –
 - (i) a person whose name is registered as a proprietor of the land
 - (ii) the State, if registered as a proprietor of the land
 - (iii) a person who holds an interest as purchaser under a contract to purchase an estate in fee simple in the land;
 - (iv) a person who is the holder of a freehold interest in land vested in an executor or administrator under the *Administration Act 1903* section 8;
 - (b) If the land is Crown land –
 - (i) The state
 - (ii) A person who holds an interest as purchaser under a contract to purchase an estate in fee simple in the land;
 - In the instance where a company is the owner an authorised person must sign and state their position
 - Strata managers/organisations/authorised agents must attach an authorisation letter or affix their seal as well as a copy of the Body Corporate minutes
- Completed MRS Form 1 (Metropolitan Region Scheme)
Available at: [MRS Form 1 Application Form](#)
- Certificate of Title for every lot (no older than 6 months.)
- Digital copy of all development plans & location plan in PDF Format and to Scale

9. Accompanying Information checklists for your Application type:

Minor Development Application (Alterations & Additions)

- Site plan
- Design and Elevations

- Sign type application form
- Site plan/ Tenancy location plan
- Sign images
- Elevation plan(s)
- Details regarding illumination (if applicable)
- Written Submission – see information kit

Change of Use Application or Minor Demolition Works

- Site Plan
- Floor Plan
- Written Submission – see information kit
- Where changing to an entertainment use – Acoustic Report is required

Minor Earth Works

- Excavation proposal
- Site Plan
- Written Submission – see information kit

10. Major Development Application Checklist

Applicant declaration

- I understand that The City may require additional information before determining the application.
 - I understand that failure on my part to provide the required information specified in the checklist can result in the City not accepting my application.
 - I understand that documents that are required to be advertised under the provisions of *City of Perth City Planning Scheme No.2*, *City of Subiaco Town Planning Scheme No.4* (applicable to Crawley and Nedlands, transferred 1 July 2016) and *City of Nedlands Town Planning Scheme No.2* (applicable to Nedlands, transferred 1 July 2016) may be made publicly available and may be displayed on The City's website.
 - I understand and acknowledge that all submitted documentation including digital 3D models may be subject to the Freedom of Information act 1982.
- Completed Application for Development Approval (Local Planning Scheme)
- The form must be signed by the owner(s). An owner who is:
 - (c) If the land is freehold land –
 - (v) a person whose name is registered as a proprietor of the land
 - (vi) the State, if registered as a proprietor of the land
 - (vii) a person who holds an interest as purchaser under a contract to purchase an estate in fee simple in the land;
 - (viii) a person who is the holder of a freehold interest in land vested in an executor or administrator under the *Administration Act 1903* section 8;
 - (d) If the land is Crown land –
 - (iii) The state
 - (iv) A person who holds an interest as purchaser under a contract to purchase an estate in fee simple in the land;
 - In the instance where a company is the owner an authorised person must sign and state their position
 - Strata managers/organisations/authorised agents must attach an authorisation letter or affix their seal as well as a copy of the Body Corporate minutes
- Completed MRS Form 1 (Metropolitan Region Scheme)
Available at: [MRS Form 1 Application Form](#)
- Certificate of Title for every lot (no older than 6 months.)
- Digital copy of all plans and documents (CD-ROM / DVD ROM/USB)
- Plans / Drawings / Photographs
- Statement of Planning Compliance
- Technical Reports
- 3D Digital Model

If you are applying for a Development Assessment Panel application, please also include the following information.

- Development Application (see above checklist)
- Completed DAP Form 1
- Certificate of Title for every lot (no older than 6 months.)
- Digital copy of all plans and documents (CD-ROM / DVD ROM/USB)
- Plans / Drawings / Photographs
- Statement of Planning Compliance
- Technical Reports
- 3D Digital Model

Applicants are strongly encouraged to liaise with the Development Approvals planning team prior to lodging a DAP application. Please contact the Development Approval Unit on 9461 3352.



MRS

Form 1 Application for Planning Approval

Owner/s details

Registered proprietor/s (landowner/s) or the authorised agent's details **must** be provided in this section. If there are more than two landowners please provide all relevant information on a separate page. Signature/s must be provided by all registered proprietors or by an authorised agent. **Alternatively**, a letter of consent, which is signed by all registered proprietors or by the authorised agent, can be provided.

Full name	Sawasdee Pty Ltd		
Company/agency (if applicable)			
ACN/ABN (if applicable)	78 782 561 064		
Postal address	Level 8, Golden Square, 32 St Georges Terrace		
Town/suburb	Perth	Postcode	6000
Signature	The landowner/s or authorised agent consents to the applicant submitting this application		Date
			07/12/23
Print name and position (if signing on behalf of a company or agency)	SOMKIAT CHANLONGSIRICHAJ		DIRECTOR

Applicant details

Name/company	PTS Town Planning Pty Ltd		
Contact person	Peter Simpson		
Postal address	PO Box 538		
Town/suburb	Inglewood	Postcode	6932
Phone	0411 445 031	Email	peter@ptsplanning.com.au
Applicant signature			Date
Print name and position (if signing on behalf of a company or agency)	Peter Simpson - Director		8/12/23

Property details

Certificate of title description of land:	Lot No	Y113 and 1	Location No	
Plan or diagram	Vol	1106	Folio	252
Certificate of title description of land:	Lot No	Y112	Location No	
Plan or diagram	Vol	2017	Folio	937
Title encumbrances (e.g. easements, restrictive covenants)	Nil			
Locality of development (house no., street name, suburb, etc)	247-249 James Street, Northbridge			
Nearest street intersection	Fitzgerald Street			
Existing building/land use	Two Storey Community Centre (Engagement Hub)			
Description of proposed development and/or use	Community centre - Ruah Engagement Hub (permanent) and Safe Night Space (approval for 30 months)			
Nature of any existing buildings and/or use	Community Centre (Ruah Engagement Hub)			
Approximate cost of proposed development (excl. gst) \$	0			
Estimated time of completion	4 months			

Office use only

Acceptance officer's Initials	<input type="text"/>	Date received	<input type="text"/>
Local government reference No.	<input type="text"/>	Commission reference No.	<input type="text"/>

The information and plans provided with this application may be made available by the WAPC for public viewing in connection with the application.

Additional Information to be provided on the MRS Form 1

Is the development within a designated Bushfire Prone Area? Yes No

If 'yes', have bushfire hazard issues been identified and addressed (e.g. by providing a BAL Assessment(s) or BAL Contour Map and a Bushfire Management Plan with the application)? Yes No
 N/A

If NA is selected and the development is in a designated bushfire prone area then a short statement justifying why SPP 3.7 does not apply should be included.

Does your application require determination by a Development Assessment Panel? (DAP) Yes No

Please refer to the following website for DAP requirements: www.dplh.wa.gov.au/daps

If yes, please complete DAP Application Form as per DAP requirements.

Checklist (supporting information)

Please complete the checklist below and ensure that all the relevant information is provided with the application.

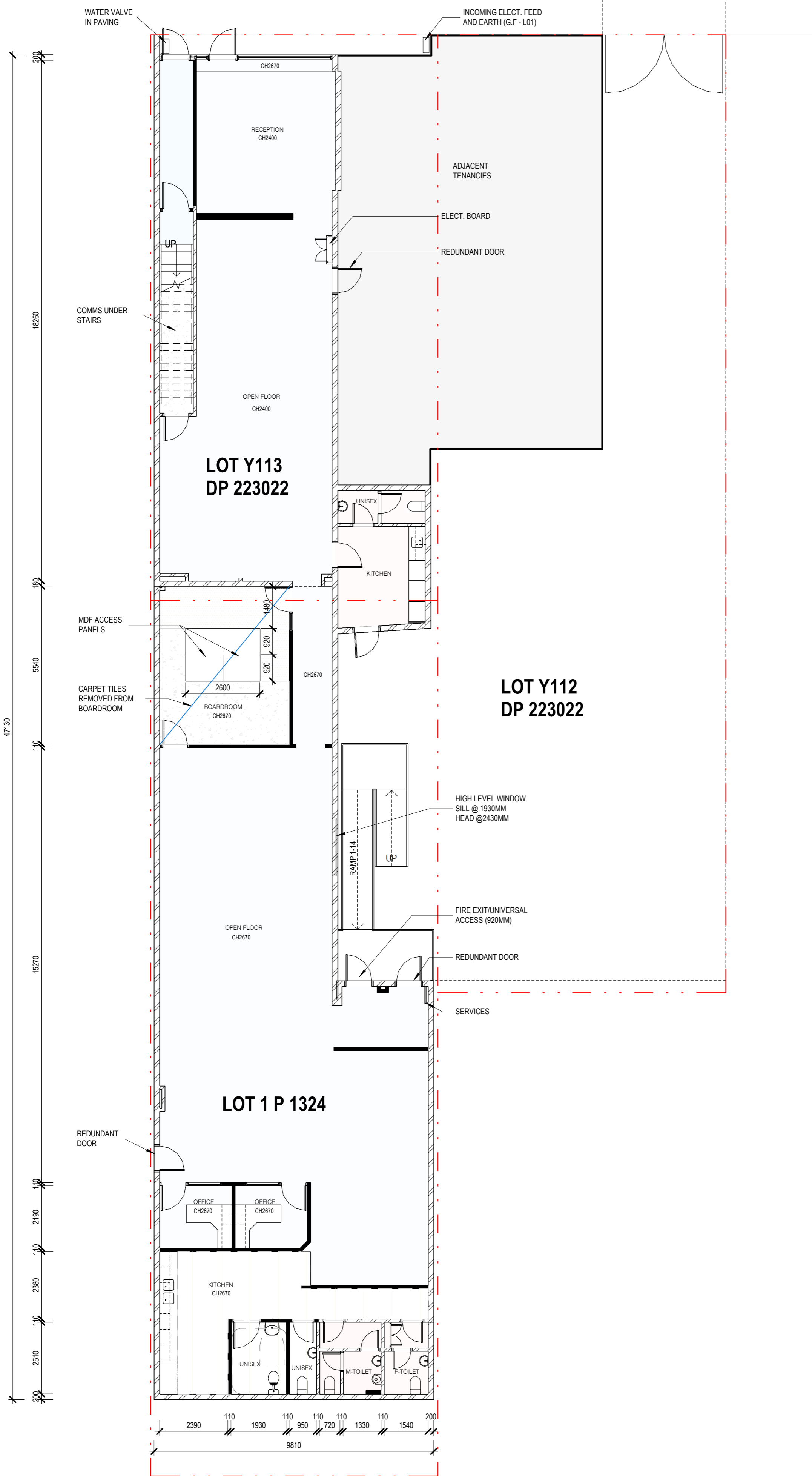
1. Completed Metropolitan Region Scheme (MRS) Form 1
2. Plans at a scale not less than 1:500 (A3) showing:-
 - (i) the location of the site including street names, lot number(s), north point and the dimensions of the site;
 - (ii) the existing and proposed ground and floor levels over the whole of the land that is the subject of the application, including details of proposed cut and fill, and retaining walls;
 - (iii) the location, metric dimensions, materials, finishes and type of all existing and proposed structures, including services, on the land that is the subject of the application and all existing structures and vegetation proposed to be removed;
 - (iv) the existing and proposed use of the site, including proposed hours of operation and buildings to be erected on the site;
 - (v) the existing and proposed means of access and egress for pedestrians and vehicles to and from the site;
 - (vi) the location, number, dimensions and layout of all car parking spaces intended to be provided, including provision for the disabled;
 - (vii) the location and dimensions of any area proposed to be provided for the loading and unloading of vehicles carrying goods or commodities to and from the site and the means of access to and from those areas;
 - (viii) the location, dimensions and design of any open storage or trade display area and particulars of the manner in which it is proposed to develop those areas;
 - (ix) the nature and extent of any open space and landscaping proposed for the site; and
 - (x) proposed external lighting and signage.
3. Plans, elevations and sections, as appropriate, of any building or structure proposed to be erected or altered and of any building or structure it is intended to retain;
4. Any specialist studies that the responsible authority may require the applicant to undertake in support of the application such as traffic, heritage, environmental, engineering or urban design studies;
5. Any management plans the responsible authority may require to support or implement the application; and
6. Any other plan or information that the responsible authority may require to enable the application to be determined. This may include scale models or information in digital formats.

For additional information please refer to Development Control Policy 1.2
www.dplh.wa.gov.au/getmedia/37533b97-e0ad-4947-9d00-c4d62fa92746/DCP_1-2_general_principles

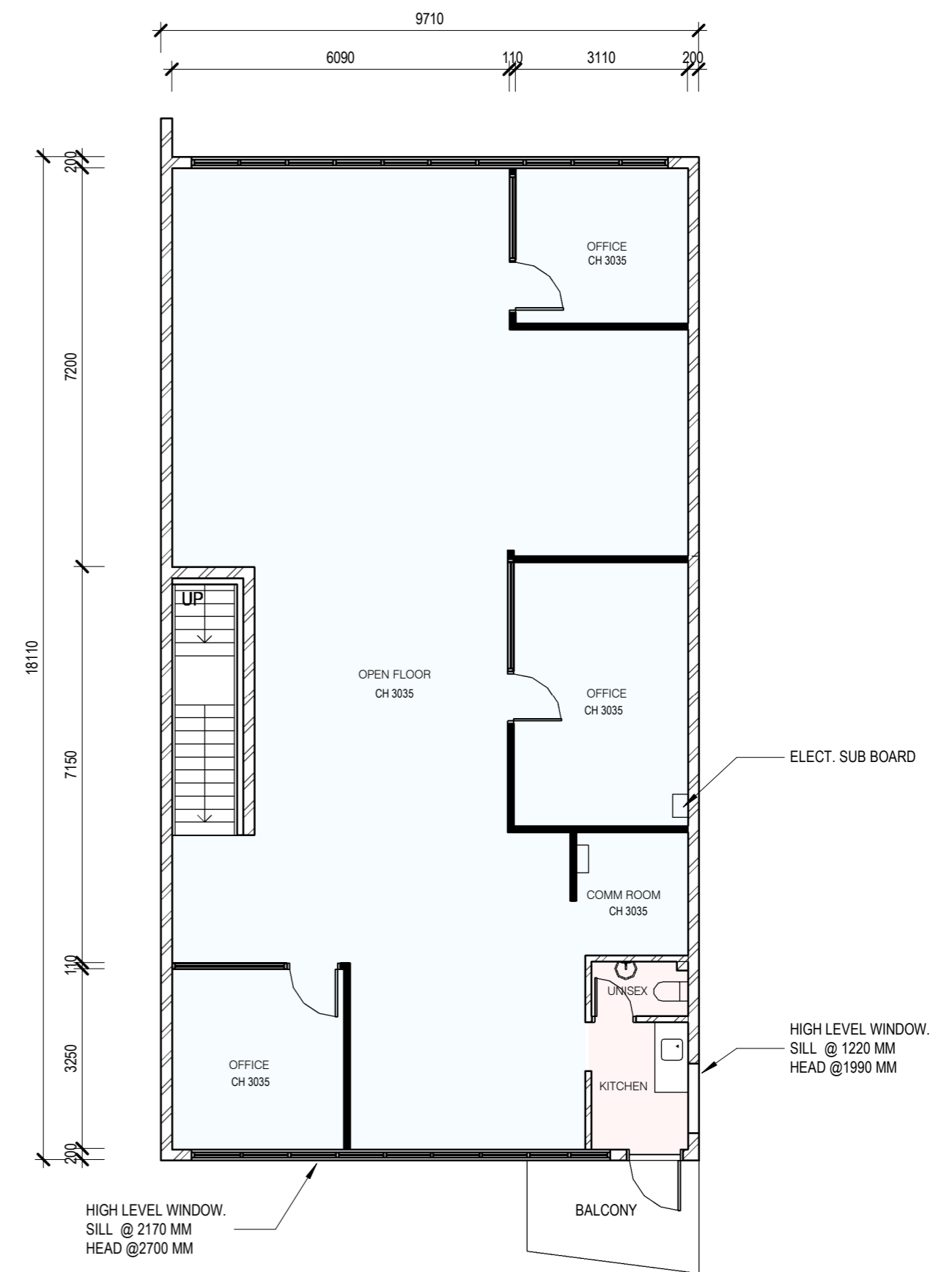
Development application checklist - lodgement requirements

<p>Application signatures</p>	<p>The MRS Form is to be signed by the registered proprietor/s as shown on the certificate/s of title. Where the landowner/s cannot sign, an authorised agent can sign and attach evidence of the authority. If the subject land is owned by a company, you must confirm whether it is a sole proprietorship company and state the full name/s and position/s of the company signatory/ies. Appropriate company signatory/ies include one director and the company seal, two directors, or one director and one secretary. Eg: _____ John F. Smith - Director Peter S James - Director Smith Pty Ltd Smith Pty Ltd Or _____ John F. Smith - Sole Director Smith Pty Ltd If the subject land is owned by a strata company, consent can be signed by the strata company secretary or by an elected person of the strata company providing proof of authority either by letter of delegated authority, signed by all strata owners or minutes showing delegated authority.</p>
<p>Certificate of Title</p>	<p>Ensure the Certificate of Title/s is/are current (within 6 months) and provide copy/s.</p>
<p>Change of name</p>	<p>Applications made by either private owners or companies who have changed names to that depicted on the Certificate of Title, must provide supporting documentation showing the change of name such as:</p> <ul style="list-style-type: none"> • a transfer of land document that incorporates a lodgement receipt, • a company search from the Australian Securities and Investment Commission, • a marriage certificate or • a change of name certificate.
<p>Contacts</p>	<p>A contact name, phone and email address is essential, in the event more information is required and for issuing correspondence relating to the Department's decision.</p>
<p>Contracts of sale</p>	<p>Where the land is subject to a contract of sale or offer and acceptance, evidence of landowner's consent must be provided. Relevant evidence may include;</p> <ul style="list-style-type: none"> • an express provision of consent by the vendor on the contract of sale or offer and acceptance, • a letter of consent from the registered proprietor/s giving prospective purchaser/s consent to lodge the application or • a copy of the transfer of land document that incorporates a lodgement receipt.
<p>Crown land</p>	<p>Where the land is registered in the name of the Crown, the application form must be signed by an authorised officer of the Department of Lands, stating the name and position. Alternatively, a letter of consent from the authorised Crown land officer.</p>
<p>Deceased estates</p>	<p>Where the land is registered in joint tenants, a copy of the death certificate of the deceased landowner must be provided. Where the land is registered in tenants in common, a copy of the grant of probate or endorsed enduring power of attorney must be provided.</p>
<p>Designated Bushfire Prone Area</p>	<p>If the proposed development is located within a Bushfire Prone Area according to the Map of Bush Fire Prone Areas, then bushfire hazard issues should be identified and addressed (e.g. by providing a BAL assessment(s) or BAL Contour Map and a Bushfire Management Plan with the application). If NA is selected and the development is in a designated bushfire prone area then a short statement justifying why SPP 3.7 does not apply should be included.</p>
<p>Emailed documents</p>	<p>Emailed applications or documents are acceptable, however the application must be signed by the registered proprietor/s.</p>
<p>Government agencies</p>	<p>Where the land is registered in the name of a government authority, the application form must be signed by an authorised officer of the relevant authority, stating the name and position of the signatory/s. Alternatively, a letter of consent signed by an authorised officer.</p>

JAMES STREET



1 GROUND FLOOR
SCALE: 1 : 100



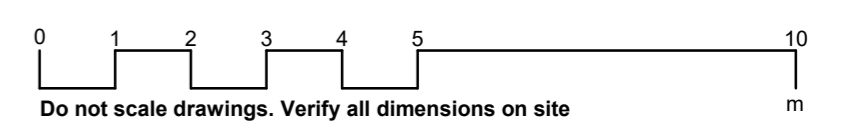
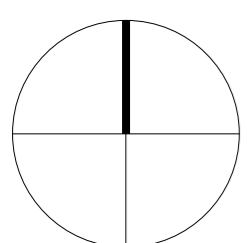
2 LEVEL 01
SCALE: 1 : 100

LEGEND

- LOT BOUNDARY
- ADJACENT TENDENCIES
- WALL TYPES
 - ▨ BRICKWORK
 - ▬ PLASTERBOARD
- FLOOR TREATMENT
 - CARPET
 - TILE
 - VINYL
 - CONCRETE
 - MDF

	G.F.A (M2*)	N.L.A (M2*)
GROUND FLOOR	335	267
LEVEL 01	154	149
TOTAL	489	416

*NOTE THESE AREAS ARE APPROXIMATE ONLY



247 JAMES ST, NORTHBRIDGE
EXISTING LAYOUT

Drawing:
Drawing no:
Issue:
Scale @A1:
Date:

FLOOR PLANS
A.DA1000
A
1 : 100
10.02.22

architectus™

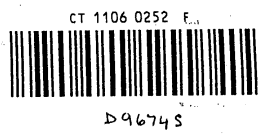
Transfer 452/1018 5671-50.
 Application 27019-50
 From Volume 118 21311-52
 66
 97 108

32896/63



REGISTER BOOK.
 Vol. 1106 Fol. 252

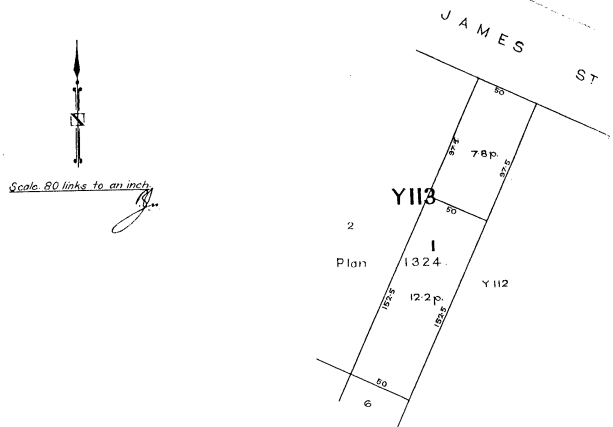
INDEXED bc



Certificate of Title

under "The Transfer of Land Act, 1893" (56 Vic., 14, Sch. 5).

Yole Tomich of 372 Newcastle Street, Perth, Married Woman, is now the proprietor of an estate in fee simple subject to the easements and encumbrances notified hereunder in all those pieces of land delineated and coloured green on the map hereon containing together twenty perches or thereabouts, being portion of Perth Town Lot Y113 including Lot 1 on plan 1324.



Dated the fifteenth day of January One thousand nine hundred and forty-eight
[Signature]
 Registrar of Titles.

TRANSFER 2208/1950 to Tomica Kate Tomich of 372 Newcastle Street, Perth, Widow.
 Registered this 13th day of February 1950
 at 3.25 o/c. *[Signature]*
 Assistant Registrar of Titles

Transfer H6349/63. An estate for life is transferred to Tomica Kate Tomich of 372 James Street, Perth, Widow and an estate in fee simple in remainder expectant upon her death to Thomas Victor Tomich of 15 Porter Street, Kalgoorlie, Catholic Priest. Registered 7th August 1963 at 10.00 oi. L.F. Symes

Transfer 58045/66 to Hotel & Cafe Supplies Pty Ltd. of 833-5 Wellington Street, Perth. Registered 22nd August 1966 at 9.28 oc
 ASSISTANT REGISTRAR OF TITLES *[Signature]*

Application F818043. The correct name and address of the proprietor is HCS Holdings (WA) Pty Ltd of 245-249 James Street, Perth. Registered 1st March 1995 at 8.19 hrs.

Transfer G43254 to Sawasdee Pty Ltd of 5th Floor, London House, 216 St George's Terrace, Perth. Registered 30th November 1995 at 15.21 hrs.



For encumbrances and other matters affecting the land see back.

21/02/97/14-106-11/1.

EASEMENTS AND ENCUMBRANCES REFERRED TO.

Collateral
 Instrument stamped 18/11/1950
MORTGAGE 10109/1950
 Tomica Kate Tomich to
 The National Bank of Australasia Limited
 Registered 17th August 1950 at 10.30 a.m.
 No. *J. H. ...*
 Assistant Registrar of Titles

Mortgage Cl36964 to Fay Dedogi, of 27 Meenaar Crescent, Mount Lawley, Married Woman. Registered 13th October, 1982 at 12.14 p.m.

DISCHARGED

Mortgage Cl36965 to Banque Nationale de Paris. Registered 13th October, 1982 at 12.14 p.m.

DISCHARGED

5958/1952 of Mortgage 10109/1950.
 19th July 1952 at 10.30 a.m.

W. Mackinnon

Discharge C794518 of Mortgage Cl36964. Registered 18th June, 1984 at 12.34 p.m.



Discharge C794519 of Mortgage Cl36965. Registered 18th June, 1984 at 12.34 p.m.



Mortgage 5806/66, to Janko Lukan, Market Gardener and Laura Lukan, his wife, both of 17 Main Street, Osborne Park. Registered 22nd August 1966 at 9.28 a.m.

Assistant Registrar of Titles

Mortgage C794520 to Douglas Horace Neame and Ivy Edith Neame, both of 1A Lilac Place, Dianella, Investors. Registered 18th June, 1984 at 12.34 p.m.

Mortgage A14135 to Bank of New South Wales. Registered 21st February 1968 at 10.44 a.m.

Mortgage C794521 to Banque Nationale de Paris. Registered 18th June, 1984 at 12.34 p.m.

DISCHARGED

DISCHARGED

As to the interest of Laura Lukan in Mortgage 5806/66 Application A196108 on the 18th March 1969 Laura Lukan one of the mortgagors died and on the 13th June 1969 Probate of her Will was granted to Janko Lukan of 17 Main Street, Osborne Park, Revised Market Gardener, the Executor herein named.

Discharge D492831 of Mortgage C794520. Registered 10th June 1987 at 10.53 a.m.



Transfer F818045 of Mortgage C794521 to Bank of Western Australia Ltd. Registered 1st March 1995 at 8.19 hrs.



Discharge A196109 of Mortgage 5806/1966. Registered 29th July 1969 at 9.17 a.m.

Mortgage F818048 to Bank of Western Australia Ltd. Registered 1st March 1995 at 8.19 hrs.

DISCHARGED

Discharge A196110 of Mortgage A14135. Registered 29th July 1969 at 9.17 a.m.

Discharge G43252 of Mortgage F818048. Registered 30th November 1995 at 15.21 hrs.



Mortgage A196111 to Custodians Pty Limited. Registered 29th July 1969 at 9.17 a.m.

Discharge G43253 of Mortgage C794521. Registered 30th November 1995 at 15.21 hrs.



Mortgage A196112 to Banque Nationale de Paris. Registered 6th May 1969 at 10.30 a.m.

Mortgage G43255 to IF & I Custodians Pty Ltd. Registered 30th November 1995 at 15.21 hrs.

DISCHARGED

Discharge B795933 of Mortgage A196111. Registered 10th October 1979 at 2.59 p.m.

Discharge G920317 of Mortgage G43255. Registered 7th October 1998 at 8.16 hrs.



Discharge B795934 of Mortgage A196112. Registered 10th October 1979 at 2.59 p.m.

Mortgage B795935 to Lois Ann Macneish of 36 Pictou Crescent, Bankburg, Married Woman. Registered 10th October 1979 at 2.59 p.m.

Mortgage G920318 to National Australia Bank Ltd. Registered 7th October 1998 at 8.16 hrs.



Mortgage B795936 to Banque Nationale de Paris. Registered 10th October 1979 at 2.59 p.m.

DISCHARGED

Discharge Cl36962 of Mortgage B795935. Registered 13th October, 1982 at 12.14 p.m.

Discharge I909698 of Mortgage G920318. Registered 8th June 2004 at 8.04 hrs.



Discharge Cl36963 of Mortgage B795936. Registered 13th October, 1982 at 12.14 p.m.

CT 1106 0252 B



CERTIFICATE OF TITLE.

Vol. Fol.

WESTERN



AUSTRALIA

TITLE NUMBER

Volume Folio

2017 937

RECORD OF CERTIFICATE OF TITLE
UNDER THE TRANSFER OF LAND ACT 1893

The person described in the first schedule is the registered proprietor of an estate in fee simple in the land described below subject to the reservations, conditions and depth limit contained in the original grant (if a grant issued) and to the limitations, interests, encumbrances and notifications shown in the second schedule.

BGRoberts
REGISTRAR OF TITLES



LAND DESCRIPTION:

LOT Y 112 ON DEPOSITED PLAN 223022

REGISTERED PROPRIETOR:
(FIRST SCHEDULE)

SAWASDEE PTY LTD OF 5TH FLOOR, LONDON HOUSE, 216 ST GEORGE'S TERRACE, PERTH
(T G043254) REGISTERED 30/11/1995

LIMITATIONS, INTERESTS, ENCUMBRANCES AND NOTIFICATIONS:
(SECOND SCHEDULE)

1. THE LAND THE SUBJECT OF THIS CERTIFICATE OF TITLE EXCLUDES ALL PORTIONS OF THE LOT DESCRIBED ABOVE EXCEPT THAT PORTION SHOWN IN THE SKETCH OF THE SUPERSEDED PAPER VERSION OF THIS TITLE.

Warning: A current search of the sketch of the land should be obtained where detail of position, dimensions or area of the lot is required.
Lot as described in the land description may be a lot or location.

-----END OF CERTIFICATE OF TITLE-----

STATEMENTS:

The statements set out below are not intended to be nor should they be relied on as substitutes for inspection of the land and the relevant documents or for local government, legal, surveying or other professional advice.

SKETCH OF LAND: 2017-937 (Y 112/DP223022)
PREVIOUS TITLE: 490-66
PROPERTY STREET ADDRESS: 247 JAMES ST, NORTHBRIDGE.
LOCAL GOVERNMENT AUTHORITY: CITY OF PERTH

NOTE 1: A000001A PENDING SURVEY - DIAGRAM 96745.



PLAN 1324

PERTH TOWN LOT Y 113

SCALE - 1:750
 L.T.O. COR. 92-96
 F.B. - 866
 INDEX PLAN - PERTH 1000 2550
 C.T. 65-46



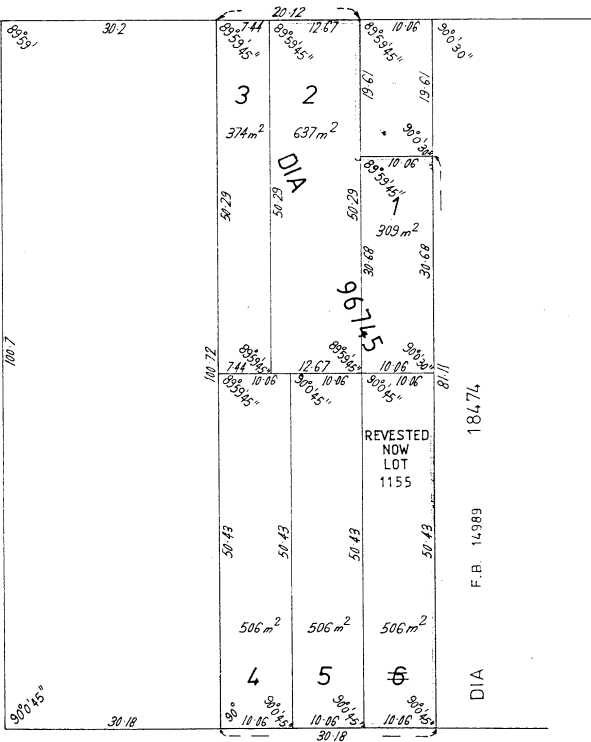
APPROVED
 18-6-96

J.M.R.
Sign

JAMES ST.

FITZGERALD ST.

ROE ST.



PLAN 1324

Ruah Safe Night Space for Women Operational Management Plan

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1. Background

This Management Plan supports the Development Application for 247 James Street, Northbridge as a Safe Night Space for Women. This proposed service would exist alongside the existing Engagement Hub, which is already in operation on the site.

About Ruah

Ruah Community Service has been providing services to rough sleepers in Western Australia for more than 60 years. In the last five years, Ruah led the successful '50 Lives 50 Homes' project, Western Australia's first Housing First initiative and collective impact project that provided sustainable housing and support to more than 160 vulnerable people. Following the success of this initiative, Ruah has been awarded the Housing First Homelessness Initiative System Coordinator function (HFSC), providing overall coordination to the Department of Communities: Housing First Homelessness Initiative (HFHI).

Ruah's manifesto is cited below:

"We believe we are all better off, as a community, as a society, if we are all connected. We need the disconnected and the vulnerable as they need us. They are us. We, but for advantages of birth or circumstance, are them – human hearts, in need of human connection and meaning in their lives. There is more that unites us than divides us, yet the most disadvantaged are stigmatised, without a voice for change. Change does not come easily. We take our legacy and inspiration from the bold, courageous individuals from as far back as the 17th century doing what nobody else dared. Not because it was asked of them but because it was right, and it was needed. Today Ruah will not meander in our pursuit of measurably transforming lives. We go boldly toward not just helping people experiencing homelessness but ending homelessness. Ending domestic violence. Changing the lives and creating opportunities for those experiencing mental health issues. We choose to work with the most vulnerable, the most challenged – because it's difficult, because this makes a difference."

As well as addressing rough sleeping, Ruah delivers high quality wrap around supports to more than 3,000 people a year in the areas of mental health, housing, homelessness, family and domestic violence and community legal services. Our model of care recognises the universality that underpins all human needs and operates through a 'no wrong door' approach. Whichever pathway people enter our services they can access the supports they need when they need them.

Our capacity to help change the lives of the people we work with is underpinned by strong corporate and clinical governance frameworks and processes that are robust and authentic – built from supporting people at a grassroots level and accredited against the National Safety and Quality Health Service Standards and National Standards for Mental Health Services.

Ruah is an independent, not-for-profit organisation lead by a highly experienced Board and Executive. We are driven to make a difference for people who are vulnerable, disadvantaged and discriminated against. Along with mental health and family and domestic violence, housing and homelessness is one of our three core service areas.

Over 2021 Ruah have initiated an innovative and ambitious project made even more challenging and important by the significant additional demands on Ruah as a result of the COVID-19 pandemic. The motivation was our unrelenting drive to best serve and support the people with whom we work – our clients – and to ensure we can do that decade, after decade, after decade. Ruah's new Model of Care, being adopted in 2021-22, guides our staff on how we support people through their journey of change. Additionally, an enhanced service delivery model has also been launched that aims to make important specialist help in areas such as child and adolescent psychology and financial counselling easily accessible across our client base.

How we support people through their journey of change moves from the traditional one-on-one support worker model to a team approach, where each client has the access to and input they need at any point in time, from key workers, support workers and specialists who can walk beside them as they navigate their way from being 'stuck' through to believing, trying, learning and, ultimately, self-reliance – based on the Outcomes Star Journey of Change model. That might also mean accessing support and services from across Ruah – a 'no wrong door' approach. Someone experiencing homelessness as a result of family violence might also access mental health

support services and even legal advice and support (through Ruah Legal Services) as part of their journey of change. The people with whom we work and whom we support experience our breadth of services as 'One Ruah'.

Ruah's management infrastructure ensures quality administrative support for the delivery of contracted services due to the way it has been designed and the additional administrative supports it makes available. Our contracted services leverage off an Executive team with over 80 years' experience in providing community services in Australia and Europe. Our contracted services also have the support of a Finance & Payroll team that lead the way in the WA NFP sector by providing live data and results through dashboard reporting allowing services to make informed decisions; and a People Development (HR) team which provides online staff management portals and learning and development modules that ensure staff are supported throughout their employment and have the relevant tools and training to complete their job to the highest standards.

2. Overview- Ruah Safe Night Space for Women

The Ruah Safe Night Space for Women (SNS) would exist at the same facility as the existing Ruah Engagement Hub (REH). Each provides a different, but complementary service, being:

- The existing **Ruah Engagement Hub** offers holistic support to those experiencing homelessness with a linkage to support services and engagement workers.
- A **Safe Night Space for Women** experiencing homelessness and other vulnerabilities to have access to an emergency overnight space for those who have no other accommodation options and who would otherwise be rough sleeping in the CBD.

A part of this facility is already in operation (the REH), while the other service (the SNS) is planned to begin operation as soon as practical, and other preparations including staff recruitment and training have been completed.

Existing- Ruah Engagement Hub

Information on the role of the REH is described below:

- A welcoming Engagement Hub, providing a range of support services during the day.
- Ruah has successfully run an engagement hub service, (operating hours 8.30am to 2:00pm) for people experiencing homelessness for more than 60 years, since opening Perth's first soup kitchen in 1959. Our understanding of the homelessness context and issues at the system and client level within the local context draws on this long legacy and experience within the local WA context. Support includes a linkage with support services and engagement workers. We offer a touch point with services linking people with accommodation services, specialist services such as alcohol and other drug (AOD) support or mental health services and legal services. The service offers provision of donations, emergency relief and food.
- The REH links in with other Housing and Homelessness services at Ruah. Based on our experience through the 50 Lives 50 Homes and 20 Lives 20 Homes projects, we will employ a range of strategies to meet the housing needs and choices of our clients including:
 - Short-term & immediate options – Such as contacting EntryPoint for access to crisis beds, referrals to crisis service Tom Fisher House.
 - Lodging, including long-term lodging options - Exploring a variety of low-cost rental housing options like Urban Fabric and Brooke Stone Properties.
 - Supported accommodation options – Such as Wandjoo Bidi, Boorloo Bidee Mia, Koort Boodja Foyer Oxford.
 - Longer-term housing options - Various existing housing properties available through a variety of housing providers from Department of Communities: Housing to Community Housing options such as Housing Choices, Foundation Housing, Community Housing Limited and Rise.
 - By Name List - Ruah is connected to the state-wide By Name List, which enables organisations across the homelessness sector to collaboratively track and support people experiencing homelessness and supports the allocation of housing and resources to the most vulnerable people as a priority. If people present to our services and are not listed on the By Name List,

workers will explain what the list is and its purpose, and, if people consent, workers add them into the system.

- Rough Sleeper Coordination Group (RSCG) Meetings -Staff attend the weekly RSCG which aims to facilitate collaboration across agencies to address support, accommodation and housing needs for people experiencing homelessness, specifically rough sleeping or persistent homelessness. The REH is staffed with support workers to meet the presenting needs of the people by building relationships and responding and supporting in times of crisis. We have four staff on-site throughout the day. They use a range of different tools including referrals to appropriate services, advocacy, informal counselling, motivational interviewing, engagement, relationship building, emotional support, education and basic life skills using trauma-informed practice in their work. We also have security on-site to support and have close relationships partner agencies and police.
- The REH implements trauma-informed practice specifically tailored to the demographics of the people who use the service, with support workers completing training in trauma-informed practice and applying the key principles and practices of trauma-informed care in all their work.
- Advocacy offered by support workers is an integral part of preventing homelessness for people who may find themselves at risk. The REH offers a range of community outreach visiting services and the demand is regularly reviewed by people who use the service and workers.

Proposed- Safe Night Space for Women

Information on the role of the SNS is described below:

- Ruah was awarded the Safe Night Space, to respond to the urgent need for a safe and culturally secure night space for women sleeping rough in Perth.
- The service model and planning presented was based on Ruah's 60+ years' experience supporting people experiencing homelessness and women escaping family and domestic violence in Perth. During Homelessness Week 2019 Ruah piloted a SNS for women from the Ruah engagement hub located at James Street, Northbridge.
- The aim of the service is to provide a safe and culturally secure night space for women sleeping rough in Perth.
- It is accessible to women during the evenings, seven days a week 365 days per year, and has capacity for 30 women a night. From our experience the demand in winter is higher and therefore due to weather events such as hot conditions or extreme winter conditions the opening hours are adapted to ensure safety of women escaping crisis.
- Women who access SNS may include chronically street-present women (rough sleepers), women escaping family and domestic violence who would otherwise face being forced onto the streets, and women awaiting placement in transitional or long-term accommodation. The specific criteria includes:
 - Women over the age of 18+
 - Women who are street-present (rough sleepers)
 - Women escaping family and domestic violence who would otherwise face being forced onto the streets
 - Women awaiting placement in transitional or long-term accommodation
 - Women who have not exceeded their placement time
- The SNS operates with a low threshold approach, which places minimal demands on the people who use the services. It offers services without attempting to control people's life choices, offering harm minimisation and support to engage with further services and supports when requested.
- The SNS takes referrals from other agencies, emergency services and walk-ins. Our in-depth understanding of rough sleepers in the cohorts addressed by the proposed services, in conjunction with our service data, has informed our referral modelling.
- Our current operational approach at the Safe Night Space (SNS) caters to a maximum of 20 scheduled referrals, 5 walk-ins, and 5 emergency cases per night. In scenarios where our capacity is reached, individuals are directed to alternative services like Crisis Care for support. We encourage those we cannot accommodate to seek safer locations, and we coordinate with local authorities only when necessary to ensure everyone's safety.
- The SNS model is dynamic, designed to be scalable and responsive to fluctuating demands and crises, such as extreme weather, health emergencies, or other situational challenges. Our adaptability allows us

to provide the best possible service within our means, continually striving to expand our capabilities to avoid having to turn individuals away.

- The services will be operated in a manner that ensures maximum utilisation so that as many rough sleepers as possible can be off the streets and then supported into housing. We will actively link with other services in the evenings to fill all available spaces.
- For the identified cohorts, the priority is safety from the streets. Most chronic rough sleepers on the streets of Perth are connected in with services such as engagement hubs and therefore this group will likely represent most of the referrals. After safety, a secondary goal for this cohort is to promote positive outcomes in which people can work with case workers, engage in linked services, and be supported into permanent housing.
- This group, once housed, will reduce the demand for the service and allowing additional people into the service. People who do not wish to engage in formal support, are newly homeless or are from another area will access the SNS through the self-presenting or emergency pathway.

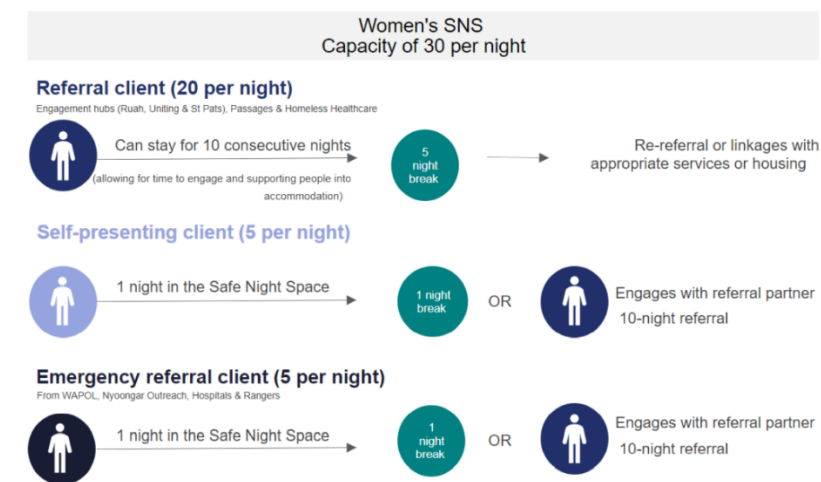


Diagram: Capacity of the proposed SNS

3. Operation of the SNS facility

Staffing

The SNS will be staffed with Ruah workers between 6:30pm and 7:30am each night (client opening hours, with security on-site are from 7pm until 7am). From our experience the demand in winter is higher and therefore due to weather events such as hot conditions or extreme winter conditions the opening hours are at times, slightly adapted to ensure the safety of women escaping crisis.

The Ruah team consists of:

- 6:30pm – 12:00am / Key Worker x 1
- 6:30pm – 12:00am / Support Worker x 1
- 11:30pm – 7:00am / Engagement Worker x 1
- 12:00am – 7:30am / Support Worker x 1

All Ruah staff are appropriately qualified and receive regular training and supervision and will leverage their experience in the sector. They are supported in the evenings by Ruah's internal on-call which is staffed by management. During usual business hours Ruah staff also have support from the Housing & Homelessness Leadership Team.

Security Management

Composition of the Security Team

- The facility will be staffed by a dedicated security team, comprising of security guards on duty from 7:00 pm to 7:00 am daily.

Role and Responsibilities

- Subcontracted Security Services – Security personnel will be subcontracted to ensure professional, efficient, and effective service.
- Primary Duties – The core responsibility of our security team is to maintain safety within the facility. Their roles encompass surveillance, risk mitigation, and incident management.
- Client-Staff Relationship – Based on our experience, we recognise the importance of a positive relationship between the security team and our clients, particularly those who are rough sleepers. Fostering a harmonious environment is crucial for the effective operation of our services.
- Induction and Familiarisation – Ruah will conduct thorough inductions for all security personnel to familiarise them with the facility's procedures, environment, and regular clients.

Training and Licensing Requirements

- All security staff must hold a valid license in accordance with the Security and Related Activities (Control) Act 1996 and the Security and Related Activities (Control) Regulations 1997.

The security protocol is designed to ensure a safe and secure environment for both clients and staff, fostering trust and respect within the facility.

Access to the Building

The James St facility features two access points:

- Main Entrance: Located at the front on James Street, this entrance is primarily for client use. It will be managed by security officers at a reception and triage desk. To respect our neighbours, a 10pm attendance curfew will be enforced for clients entering through this door.
- Staff Entrance: Situated in the rear car park, this entrance is exclusively for staff access and requires swipe card authentication. Staff may also enter through the Main Entrance using the swipe card system.

Parking Provisions

- Staff Parking: Designated secure parking for staff is available at the rear of the building.
- Client Transportation: Most clients are expected to utilise public transport or walk to the facility. Clients with vehicles will be advised not to park directly in front of or adjacent to the facility. They will be directed to alternative parking options in the nearby James Street and wider Northbridge area, with staff providing information on more affordable parking solutions.

Deliveries and Suppliers

- Parking for Deliveries: Suppliers and delivery personnel will use the rear parking area of the building.
 - Delivery Access: They are required to present themselves at the Main Entrance. Deliveries will generally consist of general office supplies and food items.
- This building management plan for the James St facility has been designed to ensure smooth operations while maintaining a secure, accessible, and neighbour-friendly environment.

Servicing and Cleaning Plan

The facility will implement a comprehensive servicing and cleaning strategy, combining internal efforts with contracted professional services to uphold a high standard of cleanliness and safety.

- Hybrid Cleaning Approach – Routine operational cleaning tasks, such as maintaining the kitchen and office spaces, will be conducted by our in-house staff. This includes everyday activities like surface cleaning, dishwashing, and organising common areas.
- Contracted Cleaning Services – To complement our internal cleaning regimen, we will engage professional cleaning services for more extensive cleaning requirements. These services will carry out regular and deep cleaning sessions to ensure the facility meets stringent hygiene standards.
- Rubbish Management – We encourage everyone at the facility to take responsibility for their litter, avoiding leaving waste inside or around the building. Signage and instructions reinforcing this policy will be prominently displayed.
- Monitoring and Disposal – Our staff will consistently monitor the facility's exterior, particularly the front area, for any unattended or unwanted personal items. Any such items will be removed and disposed of appropriately, with larger belongings being stored in secured bins at the facility's rear.

This approach ensures that the daily maintenance is efficiently managed in-house, while specialised cleaning needs are addressed by professional services, maintaining a hygienic, orderly, and inviting environment at the facility.

Outdoor Cleaning

Ruah will continually monitor the frontage and report on the maintenance of the outdoor areas at the facility. Recognising the importance of a clean environment for all, we are monitoring the public footpath in front of the building. Our staff and security are vigilant in removing any rubbish that may accumulate directly outside our facility to maintain a presentable space for both our clients and the community.

Ruah will provide periodically deep cleaning services as needed. Ruah is attentive to the condition of the premises and will remain responsive to any significant issues that may arise. Ruah acknowledges that the maintenance of the footpath falls under the jurisdiction of the City of Perth, and Ruah will report any concerns that may require the City's attention.

4. Risk and Complaint Management of Activities on Site

The facility includes a robust framework for managing risks and addressing complaints, ensuring:

- A safe environment for both clients and staff
- Transparent and accessible complaint resolution processes
- Regular reviews of safety protocols and risk management strategies.

Ruah's Management Approach

Ruah has a robust Quality Assurance system in place that will ensure compliance with all Quality Assurance requirements. Organisational and strategic risks are monitored by a Risk and Quality Team, reporting to senior leadership and Ruah's Board through a Risk and Quality Committee (comprised of Executive and Managers) that meets regularly (at least every six weeks), and a Finance Audit and Risk Committee (comprised of Ruah directors, CFO, CEO, Finance Manager, and Risk and Quality team) which meets bi-monthly.

Ruah uses Microsoft SharePoint systems, which are cloud-based, secure, and can be accessed by all workers for management and control of policies, procedures, and documents; reporting incidents, hazards, feedback, and quality improvements, with automated email notifications and escalation; and auditing.

Ruah's business activities are open, transparent and comply with the City of Perth's Statement of Business Ethics, relevant legislation and the City's policies, procedures, and practices. We employ appropriately qualified workers who demonstrate a high-level of commitment to good process and discipline. Ruah also has a strong training culture and promotes individual professional development.

Ruah's financial systems and procedures are continuously reviewed to ensure they are accurate, efficient and fit-for-purpose. Ruah's financial systems are secure and cloud-based, and provide appropriate access for workers,

based on positions and security levels. Ruah undertakes interim and annual financial audits and was issued with an unmodified audit report with no recommendations for the FY2020.

Ruah was assessed against the National Standards for Mental Health Services and the National Safety and Quality Health Services Standards in November 2018 and achieved certification through to January 2022. Ruah also recently achieved Rainbow Tick Accreditation and anecdotal feedback was that we had set new benchmarks.

Ruah has many strategies in place to mitigate risk and ensure a safe environment for staff, clients, and the community. Ruah is committed to the health and safety of our people and the environment around us.

Our corporate-wide framework will straddle our use of the space and is aligned to AS/NZ 31 000:2018 Risk Management Guidelines and includes the following components:

- I. Delegation of Authority
- II. Risk Appetite Statement, with zero tolerance for safety risks
- III. Risk Management Procedure and Process Chart
- IV. Risk Matrix: supports consistent assessment of risk
- V. Safety Management Procedure
- VI. Critical Incident Process: reporting, investigation, and review
- VII. Risk and Quality Committee
- VIII. Organisational Risk Register and Strategic Risk Register

Collectively, the framework ensures that Ruah understands, monitors, and manages the risks associated with the type of work that Ruah does.

Specific Management Strategies for the SNS

Ruah will address the specific areas of concern through the following management strategies:

Managing Noise and Other Disturbances at the SNS

To maintain a peaceful and respectful environment at the facility, particularly in consideration of our neighbours and the local community, we have implemented a comprehensive strategy to manage noise and other disturbances:

- *Security Personnel Contracting* – Ruah employs a team of contracted security personnel, ensuring a professional approach to facility safety and disturbance management.
- *Monitoring and Patrols* – Security staff are tasked with monitoring client behaviour both within and external to the premises, conducting regular patrols to maintain order and address any potential disturbances.
- *Security Licensing* – All security personnel are licensed in compliance with the Security and Related Activities (Control) Act 1996, ensuring that they are qualified and trained to handle various situations that may arise.
- *Incident Escalation Procedures* – An established procedure is in place for incident escalation, including the management of clients who may refuse to leave the premises, to ensure that any disturbances are resolved in a safe and effective manner.
- *Staff and Security Collaboration* – During operational hours, our staff and security team work closely together to promptly address any concerns or disturbances, ensuring a harmonious environment for all.
- *Mandatory Security Presence* – At least one licensed security professional will be on-site during all operational hours to oversee and manage the facility's environment.
- *Client Responsibilities* – All clients are required to agree to a Rights & Responsibilities form upon entry, which outlines expected behaviours and mutual respect for property and individuals, both inside and outside the facility. Clients unable to adhere to these expectations are required to leave and must engage in a discussion with a senior worker upon their return to address their behaviour.

Through these measures, the SNS aims to effectively manage noise and disturbances, ensuring a safe, respectful, and peaceful environment for clients, staff, and the surrounding community.

Managing Removal of Unwanted or Unattended Personal Belongings

The following measures will be in place to manage the removal of unwanted or unattended personal belongings:

- Clients must agree to our Rights & Responsibilities policy, which emphasises maintaining a clean environment within and around the facility.
- Clients are expected not to leave rubbish or personal items unattended; non-adherence will necessitate a discussion with a senior staff member upon their next visit to address this behaviour.
- Ruah staff will routinely check for and clear any unattended items left in front of the property. Disposal of such items will be handled sensitively, with storage options provided for larger belongings.
- Secure outdoor storage crates for larger items and lockers for smaller valuables will be available to clients. This aims to minimise clutter and maintain orderly surroundings.
- Signage at the front of the property will inform clients of our cleanliness standards and the protocol for unattended items, which are subject to removal during regular inspections.

Management of Congregation and Queuing

The following measures will be in place to manage any potential congregation and queuing of clients:

- Signage will direct clients to alternative services during non-operational hours and request that clients refrain from gathering outside the facility when it is closed.
- The Rights & Responsibilities policy will be amended to include a clause urging clients to respect our neighbours' comfort by not congregating around the Hub when it is not open.
- During operational hours, security personnel will manage client flow and queuing to ensure orderly access to the facility and minimise any disruption to the local area.
- Clients who congregate outside will be invited in during open hours or asked to move on respectfully. Persistent refusal will be handled according to our incident escalation procedure, ensuring the well-being of all parties involved.

This plan reflects Ruah's commitment to responsible property management, respecting our clients' needs while ensuring the safety and cleanliness of the community space around the facility.

Management of Clients Not Suitable for the SNS

When clients present to the SNS, it is possible that the service may not be suitable for everyone and their needs. SNS is a low-threshold service, meaning people can come in under the influence of drugs or alcohol, as long as their behaviour does not negatively impact others. It is an open space, not individual rooms, which is also not suitable to everyone's needs and this may be because they have been impacted by trauma and not able to be around other people. Clients may also present unwell or injured and therefore require medical care, including hospital-level care.

Staff will assess clients on a case-by-case basis and will provide one of a range of responses dependent on the situation. These may include:

- Requiring another service (e.g., Alcohol and Drug substance use or mental health) – staff will contact relevant services as required
- Disruptive or violent behaviour – managed by security staff and contacting Police if needed
- Significant injury or illness – arrange transport to hospital including calling an ambulance.

In all of the above instances, SNS staff and security are to take reasonable steps to prevent the client who is not suitable from remaining in the vicinity of the facility.

Management of Antisocial Behaviour

Antisocial behaviour will not be tolerated both within the facility and in the exterior vicinity of the building. The overall objective is to maintain a safe and disturbance-free environment for staff, consumers, and local residents adjacent to the service.

Measures to support this objective are:

- All clients are required to complete a Rights & Responsibilities form, which outlines our expectation of them and what they can expect from us. We ask that people: Respect others and property, inside and outside of the facility; If for whatever reason clients are not able to do this, they are asked to leave and next time they return, they must meet with a senior worker to discuss and address the behaviour.
- CCTV cameras will cover all main internal areas and the externally areas adjacent to the building.
- Ensure that a minimum of 1 licensed security personnel is on-site during operational hours. They will be stationed in the hub on the ground floor and where possible, will also patrol the exterior of the building periodically during the night. They will also be available to respond to any client incidents that occur either within the building or in the immediate exterior vicinity of the building.
- All SNS staff will be trained in de-escalation techniques.
- Ruah and the SNS will have a formal relationship with WA Police, ensuring responsive support from Police where this may be needed.
- There is an on-call system to provide senior-level support in the event of any incidents.

Loitering, in the context of our community guidelines and service operations at Ruah, is defined as the act of remaining in a particular public place for a protracted time without a clear purpose or activity. This does not include activities such as smoking, waiting for services, or being outside the building for a specific reason, such as having a cigarette.

Ruah is committed to minimising loitering around the facility. We recognise, however, that clients may be present outside the building as they wait for services or partake in smoking. Staff and security will manage and monitor this to ensure safety for all.

By distinguishing between loitering and the legitimate use of outdoor space by our clients, we aim to maintain a respectful and orderly environment while also being mindful of the needs and behaviours of those we serve.

5. Local Engagement and Complaints

Engagement with Local Businesses and Residents

The facility is situated in an area that contains a number of existing businesses and residents.

The services in this facility have been designed to co-exist with the local community and to play a positive part in improving the amenity and safety of the area. Ruah is committed to ensuring there is no antisocial behaviour in the vicinity of the building and will ensure appropriate management of the surrounding area. Strategies such as security patrols, lighting, CCTV, and procedures to minimise disruptions after-hours are part of the approach to managing this important relationship.

Complaints Management

As part of operating this facility we take in complaints as a part of the quality improvement process. Listening and early communication is key to resolving concerns with clients, neighbours, and the community. Complaints (which could be in connection to a client or the services that Ruah provides) can be made via the feedback form via the website, calling 13 RUAH (who will direct the complaint to the appropriate service/area), or emailing connecting@ruah.org.au or feedback@ruah.org.au.

Regarding after hours issues for the service or surroundings, the community are encouraged to call City Watch or the Police if the matter is urgent.

Ruah welcomes all feedback as an integral part of continuous quality improvement and will endeavour to resolve complaints in connection to the services that Ruah provides. There may be issues outside our control, for example issues that occur not on Ruah property but that in some way are related to Ruah, thus as part of the complaint management process, we would make reasonable efforts to resolve issues with stakeholders involved. We are reviewing our complaints management process which ensures that complaints are risk rated and escalated according to seriousness and frequency.

Further to this, Ruah have designed and will display signage that will outline where to direct feedback during operational hours.

Engagement with Local Residents for the SNS

The facility is located within a mixed-use area that includes residential properties. Recognising the importance of harmonious coexistence with our neighbours, the SNS service has been conscientiously designed to enhance the local community's safety and amenity. Our management strategies include the implementation of security patrols, enhanced lighting, and CCTV systems to foster a secure environment. Additionally, we have established protocols to minimise any potential disturbances during the after-hours operation of our services.

As part of our commitment to community engagement, we will initiate the formation of a SNS Community Advisory Group (for James Street). This group will serve as a platform for continuous dialogue and collaboration with local residents and stakeholders. The group's terms of reference have not been formally set, but are likely to encompass:

- Disseminating information about the SNS service and discussing matters that may affect both the SNS and the local community.
- Engaging in consultation regarding operational aspects of the SNS that could potentially influence the residents' quality of life.
- Providing a channel through which community concerns can be communicated, addressed, and tracked systematically.

Through these measures, we aim to ensure that the SNS is not only a safe place for our clients but also a responsible and responsive neighbour to the residents of the area.

6. Review

This document will undergo regular reviews (at least annually) to remain aligned with evolving community needs and service delivery standards. Significant changes will be communicated to relevant stakeholders, then submitted to the City of Perth.

11. Planning and Economic Development Alliance Reports

11.1 247-249 James Street, Northbridge - Proposed Temporary Safe Night Space for Women ('Community Centre') (DA-2023/5406)

Responsible Officer	Dale Page – General Manager Planning and Economic Development
Voting Requirements	Simple Majority
Attachments	Attachment 11.1A – Location Map ↓ Attachment 11.1B – Development Plans ↓ Attachment 11.1C – Amended Operational Management Plan ↓ Attachment 11.1D – Schedule of Submissions ↓ Attachment 11.1E – Applicant's Response to Submissions ↓

Purpose

For Council to determine a development application for a proposed Temporary Safe Night Space for Women ('Community Centre') at 247-249 James Street, Northbridge.

Recommendation

That Council, in accordance with the provisions of the City Planning Scheme No. 2, the Metropolitan Region Scheme and the *Planning and Development (Local Planning Scheme) Regulations 2015 – Deemed Provisions for Local Planning Schemes*, APPROVES the application for a proposed Temporary Safe Night Space for Women (Community Centre) at 247-249 James Street, Northbridge as indicated on the Metropolitan Region Scheme Form One dated 7 December 2023 and as per plans and details received on 11 December 2023 subject to:

1. The Safe Night Space for Women only operating from 7:00pm to 7:00am seven days a week.
2. The Safe Night Space for Women having a limited approval period of 30 months from the date of this determination, after which time the use must cease to the satisfaction of the City.
3. The Safe Night Space for Women being managed and operating at all times in accordance with the amended Operational Management Plan (dated 23 January 2024) at Attachment C, to the satisfaction of the City.
4. Prior to the commencement of the Safe Night Space, an updated Waste Management Plan shall be submitted to and approved by the City providing the following:
 - a. Specify what measures are being taken to mitigate the disposal of illegal items.
 - b. Specify what measures are being taken to mitigate biohazard items.
 with the approved Waste Management Plan being implemented at all times by the operator/manager, to the satisfaction of the City.

Background

1. The subject site is located on the south-western side of James Street, near Fitzgerald Street and has a total area of 1,482m². A location map is at Attachment A.
2. The area is typically characterised as a mixed-use area, with commercial properties to the east, west and south, including the Northbridge Police Station located immediately to the west. The street block to the north of the site, bound by James, Fitzgerald, John, and Shenton Streets, contains a mix of short stay and permanent residential accommodation. The development opposite the subject site contains ground floor commercial tenancies.

The previous application / approval

3. In February 2022 a development application was lodged with the City for a change of use from an Education Facility to a Community Centre ('Community and Cultural') to accommodate the Ruah Engagement Hub.
4. At the 31 May 2022 Ordinary Council Meeting, the Council resolved to refuse the development application, for the following reasons:
 1. *The proposal is contrary to clause 67(2)(a) of the deemed provisions as the proposed use is inconsistent with the statement of intent for the Northbridge Precinct to provide a diverse, interesting and dynamic inner-city precinct that will be promoted as an attractive destination for the local population and interstate and overseas visitors.*
 2. *The proposal is contrary to clause 67(2)(n) of the deemed provisions as the proposed use will adversely impact upon the amenity and character of the locality which includes the permanent residential dwellings located in the surrounding locality, by way of adverse noise, reduced public safety and antisocial behaviour.*
 3. *The proposal is contrary to clause 67(2)(y) of the deemed provisions as the proposal does not adequately address community concern relating to an increase in antisocial behaviour, a reduction in public safety, loss of residential amenity, and an adverse impact on business.*
5. On 10 June 2022, the applicant applied to the State Administrative Tribunal (SAT) for a review of Council's decision.
6. Under Section 246(2) of the *Planning and Development Act 2005*, the President of the SAT may be directed to refer the application for review to the Minister for Planning for determination, if the Minister considers that the application raises issues of such State or regional importance that it would be appropriate for the application to be determined by the Minister. These "calling in" powers were exercised by the Minister on 22 June 2022.
7. On 21 September 2022, the Minister granted approval for the use of the subject site for a Community Centre, subject to conditions.
8. The Minister's decision was based largely on the following planning conclusions:
 - a. The use falls within the City Planning Scheme No. 2 (CPS2) definition of 'Community Centre'.
 - b. The use falls within the broader CPS2 use group of 'Community and Cultural'.
 - c. The use is, therefore, a Preferred or 'P' use for the subject site under CPS2.
 - d. In accordance with clause 32 of CPS2, an application for a **'P' use cannot be refused on the basis of the proposed use**, including potential amenity impacts of the use.

- e. No external works are proposed that would warrant the need for development approval; therefore, the specific development standards and requirements of CPS2, including any planning policy, are not relevant and the proposal can therefore not be considered against clause 36 of CPS2 for non-complying applications.
- f. Notwithstanding point d. above, the Minister made the following comments regarding amenity impacts when making the determination:
 - i. The use provides an important social service aimed at reducing homelessness and, as such, will assist to promote the Northbridge Precinct as a precinct that caters for a diversity of demands and is attractive to interstate and overseas visitors.
 - ii. The use is a service that is consistent with the 10-year Strategy on Homelessness and directly assists in implementing the Action Plan.
 - iii. The use will not significantly impact the existing amenity of the locality and the amenity concerns raised by the community can be effectively managed.
 - iv. The use will have minimal, if any, traffic impacts.
 - v. There is a community need for the use.
 - vi. The establishment of the use is in the public interest and if it doesn't exist, a significant number of people would be left without the services that it provides, and this would result in the homeless crisis in Perth to become worse.
- 9. The City is not bound by the Minister's previous decision when considering this (similar) application. However, due regard does need to be given to the Minister's decision - especially to the extent to which the decision was formed by factors relating to planning matters.
- 10. The Community Centre previously approved by the Minister has been operating from the subject site since late February 2023.

Scheme amendments to change land use permissibility

- 11. In response to an earlier Notice of Motion, at its Ordinary Meeting held on 30 May 2023, Council resolved to support Amendment 49 to CPS2 and Amendment 6 to LPS26.
- 12. The purpose of the amendments was to change the land use permissibility for the 'Community' and 'Community and Cultural' land uses from Preferred 'P' use to Contemplated 'C' use.
- 13. These amendments would not have prohibited the Community and Cultural use group and Community Centre land use from being approved; however, they would have enabled a higher level of scrutiny of the appropriateness of each individual proposal via an assessment against the matters set out under clause 67 of the Deemed Provisions of the *Planning and Development (Local Planning Schemes) Regulations 2015* and provided the ability for the City to refuse a proposal where it was deemed the proposal was not suitable for the specific site/locality in question.
- 14. On 27 September 2023, correspondence was received from the State Government advising that the amendments had not been approved.
- 15. The land use permissibility of 'Community' and 'Community and Cultural' land uses will be further reviewed as part of the City's new Local Planning Scheme No. 3 (LPS3).

The current application

- 16. In November 2023, Ruah queried the process required to operate a Safe Night Space for Women from their existing engagement hub. The City's planning staff advised a preference for a new development

application for any proposal that would change/expand the current operations at the subject site and advised that any such proposal would be advertised for community comment given the community interest in the previous development application.

17. A development application was received in December 2023 for a Temporary Safe Night Space for Women.

Landowner	Sawasdee Pty Ltd
Applicant	PTS Town Planning Pty Ltd
Zoning	(MRS Zone) Central City Area (City Planning Scheme Precinct) Precinct 1 - Northbridge (City Planning Scheme Use Area) City Centre
Approximate Cost	Nil

18. The proposed new temporary service is intended to operate for a period of 30 months, in addition to the existing Ruah Engagement Hub (Community Centre), which will continue under the terms and conditions of the Minister’s approval dated 21 September 2022.
19. The application does not include any physical alterations to the existing building.
20. The applicant’s written submission outlines that:
- a. The Safe Night Space provides an emergency overnight space for women in crisis, including those seeking to escape domestic violence situations. It is a place where women can rest and connect to support services.
 - b. No beds will be provided – there will be access to basic services (laundry, toilets, shower).
 - c. There will be a maximum capacity of 30 women a night, limited to:
 - 20 referral clients - can stay for 10 consecutive nights with a five-night break between
 - Five self-presenting clients - can stay one night with a one-night break between
 - Five emergency clients - can stay one night with a one-night break between.
 - d. The Safe Night Space will operate from 7:00pm to 7:00am seven days a week, with a curfew on attendance via the main entrance from 10:00pm.
 - e. Two staff members (key worker/support worker/engagement worker) will be present on site between 6:30pm and 7:30am.
 - f. Two security staff will be present between 7:00pm and 8:00am.
 - g. A temporary approval is sought given that new facilities and services will come online within this period, meaning that the service will likely no longer be required from the subject site.
21. As part of the application, an Operational Management Plan has been submitted which details the breakdown of clients; the operation of the facility (staffing, security management, access to the building, servicing, and cleaning); risk and complaint management; local engagement and frequency of review of the Operational Management Plan.

Discussion

22. The application has been assessed against the requirements of the City Planning Scheme No. 2 (CPS2).

Land use definition

23. The proposed use is considered a Community Centre as per the following definition in CPS2: *“premises accommodating services (such as health or social services) or facilities (such as meeting or recreation facilities) primarily for the benefit of those who live or work in the surrounding locality”*.
24. Even if an argument could be made that the proposed use does not fall within the definition of a Community Centre on the assumption that users of the service do not live or work in the surrounding locality, the proposed use is considered to fall within the broader use group category ‘Community and Cultural’ - defined in Schedule 2 of CPS2 as: *“premises used to provide social, cultural or recreational facilities and services, generally on a non-profit basis, for the benefit of the community including: community centre, exhibition centre, public library, place of worship”*.
25. The Minister’s decision on the Ruah Engagement Hub (September 2022), was based on the premise that the existing use on the site falls within the CPS2 definition of ‘Community Centre’ and ‘Community and Cultural’.
26. The proposed use arguably has closer alignment with the above land use definitions, given the assumption that users of the Safe Night Space could ‘live or work’ in the surrounding locality.

Land use permissibility

27. Under CPS2, the subject site falls within the City Centre area of the Northbridge Precinct.
28. In the use group table in Schedule 3 of CPS2 the use group ‘Community and Cultural’ is a Preferred ‘P’ use in the Northbridge Precinct.
29. Clause 32(b) of CPS2, which deals with Preferred ‘P’ uses, outlines that a development application for a Preferred ‘P’ use **cannot be refused** on the basis that the proposed use is said to be unacceptable.

Assessment against specific development provisions and/or policy

30. The application proposes the addition of a service (use) only - no works that would ordinarily require a development approval are proposed. As such, the application is not subject to an assessment against any specific development requirements under CPS2 and cannot be refused for non-compliance with any specific development provisions of CPS2.
31. Given the above, it is also not appropriate for the City to refuse the application, based on any of the factors listed in clause 67 of the Deemed Provisions of the *Planning and Development (Local Planning Schemes) Regulations 2015*, (including amenity) as this would essentially be an assessment of the appropriateness of a Preferred ‘P’ use which, as per clause 32(b), cannot be refused.
32. Notwithstanding this, community consultation was undertaken, and the City has assessed the application against the specific matters listed in clause 67(2) of the Deemed Provisions - including the objectives and intentions of CPS2 and the Precinct Plan for Northbridge. This was done to determine what conditions should be imposed if Council approves the application, and to inform the Operational Management Plan for the proposed Safe Night Space.
33. Issues raised by the community and details of the assessment against clause 67 of the Deemed Provisions are outlined below.

Issues raised by the community

34. Ordinarily, an application for a Preferred 'P' use, which does not propose any works to the building that would require development approval, is not required to be advertised prior to the City determining the application.
35. Notwithstanding this, because of the submissions received in response to the previous application and to assist in formulating conditions of approval which respond to community concerns, the current proposal was advertised for a period of 28 days. Letters were sent to owners and occupiers directly surrounding the site and an email was sent to submitters who provided comments on the previous development application.
36. The City received a total of 38 submissions - 30 objections and eight (8) submissions of support for the proposal. In addition to these submissions, Ruah provided a document containing 69 individual statements of support.
37. The submissions of support for the proposal relate primarily to the need for the service and the credentials of the service provider. Whilst these are important social considerations, they are not matters that can ordinarily be taken into account by local government in assessing the planning merit of any proposal.
38. The main areas of concern outlined in the submissions objecting to the proposal have been summarised and addressed under common themes below:

Issue	Response
<p>Antisocial behaviour and management of the service:</p> <ul style="list-style-type: none"> • <i>Existing crime and vandalism will be exacerbated</i> • <i>Capacity and capability of non-profit organisation managing the site</i> • <i>Creation of a meeting hub for homeless people</i> • <i>Proximity of the safe space to the entertainment centre, placing women at risk</i> • <i>Existing Management Plan not complied with</i> • <i>People loitering and sleeping within private properties</i> • <i>Cleaning of biohazard waste around and within private properties</i> 	<p>These matters are discussed in more detail in the next section of the report. The issues raised have been used to inform recommended conditions of approval, with a view to minimising any potential impacts of the proposal.</p>
<p>Loss of amenity for existing properties and businesses:</p> <ul style="list-style-type: none"> • <i>Agglomeration of homeless services within the area</i> • <i>Existing Community Centre the most disruptive addition to this area</i> 	<p>These matters are discussed in more detail in the next section of the report. The issues raised have been used to inform recommended conditions of approval, with a view to minimising any potential impacts of the proposal.</p>

<ul style="list-style-type: none"> • <i>Noise pollution</i> • <i>Not in alignment with the intent of the Northbridge Precinct</i> • <i>Loss of business and closure of a number of small businesses</i> • <i>Public perception of Northbridge being unsafe already</i> • <i>Acknowledge that this service is required, however this location is not appropriate</i> • <i>Interests of all parties to be weighed against each other</i> 	
<p>Loss of property values:</p> <ul style="list-style-type: none"> • <i>People will be deterred to invest in area due to perceptions on location</i> • <i>Abandonment of existing development approvals within close proximity to the site</i> • <i>Establishment of a homeless precinct will impact on property values</i> 	<p>Whilst potential impact on investment and property values are understandably of high importance to individual landowners and occupants, the City is not able to consider these in the assessment of the planning merit of any planning proposal.</p>
<p>Determination of application:</p> <ul style="list-style-type: none"> • <i>Application of this nature to be determined by Council only and not under delegated authority</i> • <i>Do not agree with the Council's decision to close the Safe Night Space at the Rod Evans Centre</i> • <i>Decision of the State Government disregarded previous concerns raised in submissions</i> 	<p>This application is being determined by Council.</p> <p>The closure of the Rod Evans Centre was a separate decision of Council and has no bearing on this development application.</p>

Consideration of potential impacts – assessment against clause 67

39. As outlined earlier in this report, the application cannot reasonably be refused, based on:
- the proposed use
 - non-compliance with specific development standards of CPS2 or planning policy
 - factors of the type listed within clause 67 of the Deemed Provisions (matters that local government generally takes account of when considering planning applications).
40. Notwithstanding this, the proposal has still been assessed against the relevant matters outlined in clause 67(2) of the Deemed Provisions (including the concerns raised in the submissions received), to assist in formulating conditions of approval to mitigate any potential impacts of the proposal on the surrounding community.

41. Clause 67(2)(a) requires consideration of the objectives of any applicable planning scheme. The objectives of CPS2 are high level and are not considered to have a strong or clear link to this specific proposal that would enable the objectives to inform any relevant conditions of approval.
42. Clause 67(2)(m) requires consideration of *“the compatibility of the development with its setting, including (i) the compatibility of the development with the desired future character of its setting; and (ii) the relationship of the development to development on adjoining land or on other land in the locality including, but not limited to, the likely effect of the height, bulk, scale, orientation and appearance of the development.”*
43. The proposal is a Preferred ‘P’ use under CPS2. It **cannot be refused** based on the proposed use and as a result cannot be considered incompatible with its setting. There are no physical works proposed with this application so the compatibility of the development (building) in relation to adjoining development, is not a factor that can inform any relevant conditions of approval.
44. Clause 67(2)(n) requires consideration of the amenity of the locality including the environmental impacts of the development; the character of the locality; and the social impacts of the development. Amenity is defined as *“all those factors which combine to form the character of an area and include the present and likely future amenity”*.
45. It is acknowledged that some people attending the site to access the Safe Night Space could generate noise and behaviour that may have a negative impact on the amenity of nearby residents and business owners/operators.
46. These are similar issues, which were addressed in the Minister’s decision for the previous application for the Ruah Engagement Hub, with the Minister concluding that the service would not significantly impact the existing amenity of the locality and any potential impacts could be effectively managed.
47. Notwithstanding the previous position taken on potential amenity impacts, City staff have sought to strengthen the requirements of the new Operational Management Plan in response to concerns raised during the community consultation period for the current application.
48. To this end, more information/amendments were requested from the applicant/operator to address:
 - a. the management of those who are not able to be accommodated.
 - b. security staff to provide ongoing management of external spaces.
 - c. whether the staffing numbers of Ruah staff and security staff are sufficient.
 - d. how access to the building will be monitored (i.e., CCTV).
 - e. management of non-admitted individuals sleeping in cars.
 - f. cleaning of biohazards, cleaning of public spaces and cleaning of personal belongings.
 - g. immediate response protocols for out-of-hours public, city and agency complaints/concerns.
 - h. management of clients being allowed outside for fresh air.
 - i. incident escalation procedures.
 - j. frequency and reasons for local engagement.
 - k. protocols for disturbances after-hours.
49. More information was provided by the applicant/operator and changes were made to the Operational Management Plan, in relation to: extending security staffing times; availability of additional staff during peak times or situations of high demand; development of a comprehensive response protocol for a security team including addressing incident escalation; site hygiene; external noise management; litter

and abandoned belongings; CCTV monitoring; external monitoring of outside spaces by security staff; updates to the servicing and cleaning strategy for the site; and more rigour in the complaints management procedure, including details of staff responsibilities and signage installed at premises directing clients to alternative sites.

50. Based on assessment against clause 67(2)(n) and the issues raised by the community, it is recommended to impose a condition of development approval that will require the amended Operational Management Plan to be implemented at all times to the satisfaction of the City.
51. Given the current approval for the Ruah Engagement Hub was issued by the Minister, the City has limited ability to enforce the current management plan. However, if this application is approved by Council, it will allow the City to enforce the new management plan for the Safe Night Space, during the time-limited approval (30 months) for the use.
52. As a result of the proposed Safe Night Space and associated staff/security on site for longer hours, and tighter requirements in the proposed management than those that currently exist, this could assist in addressing any current amenity impacts on adjoining residential properties.

Summary / Conclusion

53. The proposed Safe Night Space falls within the definition of a 'Community Centre' and within the broader 'Community and Cultural' use group category in the City's planning scheme.
54. This makes the proposed use a Preferred 'P' use in the Northbridge Precinct.
55. In accordance with clause 32 of CPS2, an application for a 'P' use cannot be refused on the basis of the proposed use, including potential amenity impacts of the use.
56. No works are proposed that would warrant the need for development approval; therefore, the specific development standards and requirements of CPS2, including any planning policy, are not relevant and the proposal can therefore not be considered against clause 36 of CPS2 for non-complying applications.
57. Notwithstanding the above, the proposal has been assessed/considered against:
 - a. The Minister's previous decision for the current use on site (Ruah Engagement Hub) – Council is required to have due regard to the previous decision given its similarity to the current proposal.
 - b. The relevant matters of clause 67(2) – even though the application cannot be refused on the basis of any of these matters.
 - c. The concerns raised in the submissions received from the community - for the purposes of formulating recommended conditions of approval.
58. As a result of this assessment/consideration, it is recommended that the application be approved subject to implementation of the amended Operational Management Plan and the use being time limited to a period of 30 months, after which the use must cease to operate at the premises.

Consultation

59. Ordinarily, there would be no requirement for the proposal to be advertised, prior to determination of an application such as this one.
60. Notwithstanding this, consultation was undertaken as described earlier in this report and the issues raised by the community have assisted in strengthening the content of the Operational Management Plan and informing the recommended conditions of approval.

Decision Implications

61. Should Council approve the application, the proposed Safe Night Space will operate for a period of 30 months, in addition to the existing Ruah Engagement Hub, which would continue to operate under the terms and conditions of the Minister’s approval dated 21 September 2021.
62. Should Council refuse the application, or should the applicant disagree with any conditions of approval, the applicant has the right to apply to the State Administrative Tribunal for a review of Council’s decision.
63. Under Section 246(2) of the *Planning and Development Act 2005*, the President of the SAT may be directed to refer any such application for review to the Minister for determination, if the Minister considers that the application raises issues of such State or regional importance that it would be appropriate for the application to be determined by the Minister.

Strategic, Legislative and Policy Implications

Strategic Community Plan	
Strategic Pillar (Objective)	Liveable
Related Documents (Issue Specific Strategies and Plans):	<p><i>Homelessness Action Plan 2022-2024</i></p> <p>The proposed facility will support women escaping domestic violence, women awaiting placement in transitional or long-term accommodation and may include chronically street present women. The Safe Night Space will provide safety and shelter for these women who have no other place to go and end up sleeping rough.</p> <p>The City’s Homelessness Action Plan 2022 – 2024 aims to target rough sleeping, as the most vulnerable cohort, with the intention that future action plans across the ten years will have an increased focus on prevention and embedding system changes to improve and sustain efforts to end homelessness.</p>

Legislation, Delegation of Authority and Policy	
Legislation:	<p><i>Planning and Development Act 2005</i></p> <p><i>Planning and Development (Local Planning Schemes) Regulations 2015</i></p> <p><i>City Planning Scheme No. 2</i></p> <p><i>Metropolitan Region Scheme</i></p> <p><i>City of Perth Act 2016</i></p>
Authority of Council/CEO:	<p>The authority to determine this development application has been delegated by Council to the CEO, the General Manager Planning and Economic Development and the Alliance Manager Development Approvals under the <i>Planning and Development Act 2005</i>.</p> <p>However, in accordance with delegation 9.2(2)(b) the application is referred to Council, noting the nature of the objections received during public consultation.</p>
Policy:	No specific policies under the CPS2 are relevant to this development application.

Financial Implications

Nil.

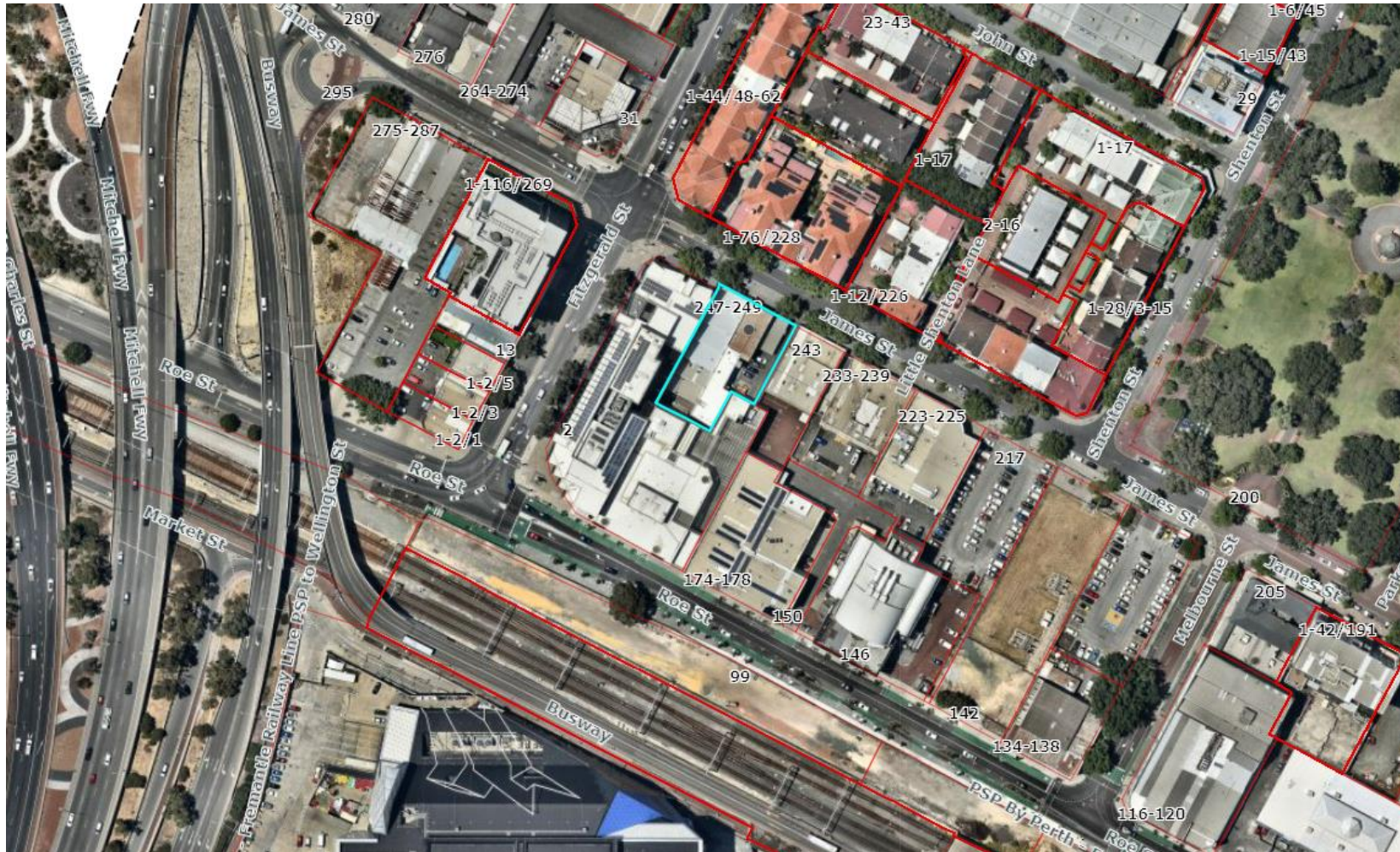
Further Information

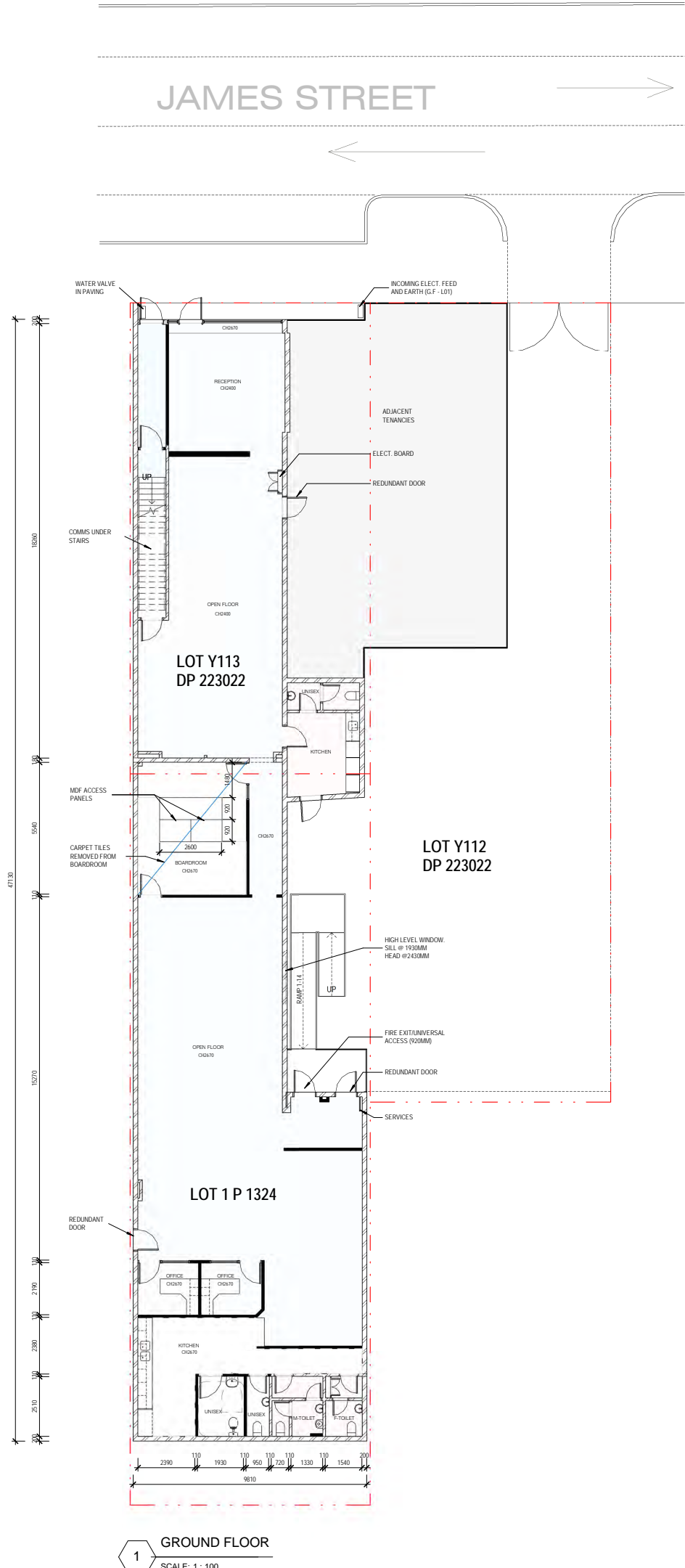
64. Questions and Responses forming part of the Agenda Briefing Session held on 20 February 2024 are as follows:

	Question	Response
1.	<p>1. I have read the submissions provided in the Agenda and reading the For and Against comments I am concerned that many 'Against' comments are focused on the failure to fully meet and execute your management plan. I recall during your tenure at Rod Evans this was also raised by several community members.</p> <p>a. How will this be managed at the new proposed site with the application changes ?</p> <p>b. Who reviews this and at what frequency?</p> <p>c. Many organisations similar to this like care homes have external auditors in to ensure that agreements are met, and good governance is adhered to in the workplace. Does your organisation do this? If yes, would the CoP be able to access the reports for totally transparency and good communication? If no, why?</p>	<p>1. The previous application was approved by the (then) Minister for Planning, including the Management Plan for that application. Given this, the City has no compliance jurisdiction and cannot enforce the provisions of the current Management Plan. If Council approves the current application, subject to the conditions recommended by the Administration, the City will have the ability to enforce the conditions of the planning approval and the provisions in the proposed new Management Plan.</p> <p>2. Ruah's Operational Management Plan outlines that Ruah will regularly review their Management Plan (at least annually). Significant amendments would need the City's approval.</p> <p>3. This is a question for Ruah and should be asked during Ruah's deputation.</p>
2.	<p>What community consultations within a half KM radius have you encouraged and engaged in especially those who live and work directly opposite the hub who will be impacted by the changes in use?</p>	<p>Technically, there is no requirement for the City to consult on an application for a Preferred 'P' use.</p>

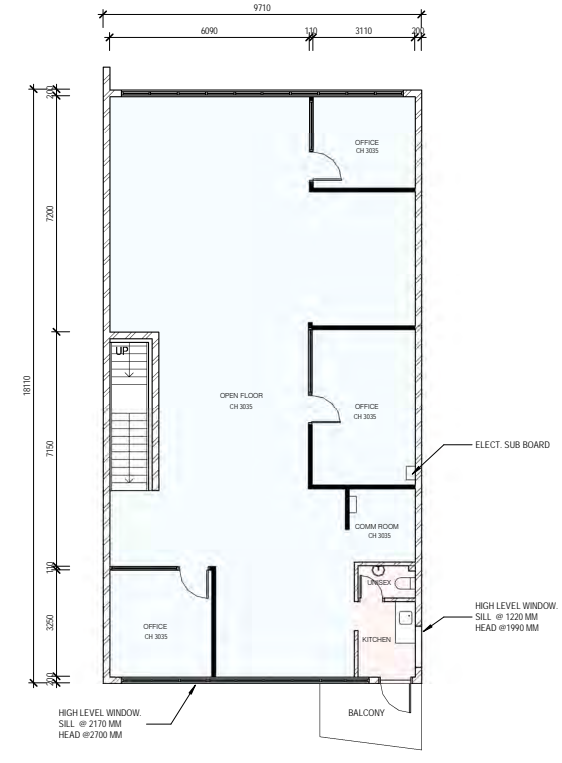
	Question	Response
3.	<p>2. I noted in your management plan you intend to create a 'SNS Community Advisory Group", has this been done before and how effect was it? Do you intend to include the CoP and WA Police as members so information can be communicated fairly and transparently across the board and reduce hearsay in the community?</p> <p>a. When will this be set up, what frequency and will the meeting be minuted and available to the CoP and other stakeholders? If no, why?</p>	<p>This is a question for Ruah and should be asked during Ruah's deputation.</p>

Attachment 1 – Location Map





1 GROUND FLOOR
SCALE: 1 : 100

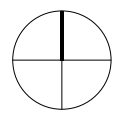


2 LEVEL 01
SCALE: 1 : 100

- LEGEND**
- LOT BOUNDARY
 - ADJACENT TENDENCIES
- WALL TYPES**
- ▨ BRICKWORK
 - ▬ PLASTERBOARD
- FLOOR TREATMENT**
- CARPET
 - TILE
 - VINYL
 - CONCRETE
 - MDF

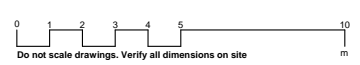
	G.F.A (M2*)	N.L.A (M2*)
GROUND FLOOR	335	267
LEVEL 01	154	149
TOTAL	489	416

*NOTE THESE AREAS ARE APPROXIMATE ONLY



247 JAMES ST, NORTHBRIDGE
EXISTING LAYOUT

Drawing: **FLOOR PLANS**
Drawing no: **A.DA1000**
Issue: **A**
Scale @A1: **1 : 100**
Date: **10.02.22**



architectus™



**Ruah Safe Night Space for Women
Operational Management Plan**

Status: 23 January amendments



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1 Background

This Management Plan supports the Development Application for 247 James Street, Northbridge as a Safe Night Space for Women. This proposed service would exist alongside the existing Engagement Hub, which is already in operation on the site.

1.1 About Ruah

Ruah Community Service has been providing services to vulnerable Western Australians for more than 60 years. In the last five years, Ruah led the successful '50 Lives 50 Homes' project, Western Australia's first Housing First initiative and collective impact project that provided sustainable housing and support to more than 160 vulnerable people. Following the success of this initiative, Ruah has been awarded the Housing First Homelessness Initiative System Coordinator function (HFSC), providing overall coordination to the Department of Communities: Housing First Homelessness Initiative (HFHI).

Ruah's manifesto is cited below:

"We believe we are all better off, as a community, as a society, if we are all connected. We need the disconnected and the vulnerable as they need us. They are us. We, but for advantages of birth or circumstance, are them – human hearts, in need of human connection and meaning in their lives. There is more that unites us than divides us, yet the most disadvantaged are stigmatised, without a voice for change. Change does not come easily. We take our legacy and inspiration from the bold, courageous individuals from as far back as the 17th century doing what nobody else dared. Not because it was asked of them but because it was right, and it was needed. Today Ruah will not meander in our pursuit of measurably transforming lives. We go boldly toward not just helping people experiencing homelessness but ending homelessness. Ending domestic violence. Changing the lives and creating opportunities for those experiencing mental health issues. We choose to work with the most vulnerable, the most challenged – because it's difficult, because this makes a difference."

Ruah delivers high quality wrap around supports to more than 3,000 people a year in the areas of mental health, housing, homelessness, family and domestic violence and community legal services. Our model of care (our roadmap to how to deliver services to our clients) operates through a 'no wrong door' approach. Whichever pathway people enter our services they can access the supports they need when they need them.

Our capacity to help change the lives of the people we work with is underpinned by strong corporate and clinical governance frameworks and processes– built from supporting people at a grassroots level and accredited against the National Safety and Quality Health Service Standards and National Standards for Mental Health Services.

Ruah is an independent, not-for-profit organisation lead by an experienced Board and Executive. We are driven to make a difference for people who are vulnerable, disadvantaged and discriminated against.

In 2021 Ruah implemented its innovative and ambitious new project; Ruah's Model of Care. Our Mode of Care guides our staff on how to support our clients through their journey of change while also making specialist support, such as child psychology and financial counselling, easily accessible. Implementing our Model of Care became more significant as Covid 19 placed additional demands and hardships on the clients we serve, but we used this added complexity as the motivational driver to successfully implement our model which will now in place to best serve our clients for decades to come.

How we support people through their journey of change moves from the traditional one-on-one support worker model to a team approach, where each client has unfettered access to the supports they need, from key workers, support workers and specialists who can walk beside them as they navigate their way from being 'stuck' through to



“believing”, “trying”, “learning” and, ultimately, “self-reliance” – based on the Outcomes Star Journey of Change model. That might also mean accessing support and services from across Ruah – a ‘no wrong door’ approach. Someone experiencing homelessness as a result of family violence might also access mental health support services and even legal advice and support (through Ruah Legal Services) as part of their journey of change. The people with whom we work and whom we support experience our breadth of services as ‘One Ruah.’



2 Overview - Ruah Safe Night Space for Women

The Ruah Safe Night Space for Women (SNS) will exist at the same facility as the existing Ruah Engagement Hub (REH). Each provides a different, but complementary service.

- A **Safe Night Space for Women** provides safety and shelter for women in crisis through the provision of an emergency overnight safe space. This space is for those who are in a situation of violence or escaping family domestic violence and with no other place to go end up sleeping rough.
- The existing **Ruah Engagement Hub** offers holistic support to those experiencing homelessness with a linkage to support services and engagement workers.

A part of this facility is already in operation (the REH), while the other service (the SNS) which was operating successfully at the Rod Evans Centre from May 2021 up until the end of November 2023, is planned to begin operation as soon as practical, and other preparations including staff recruitment and training have been completed.

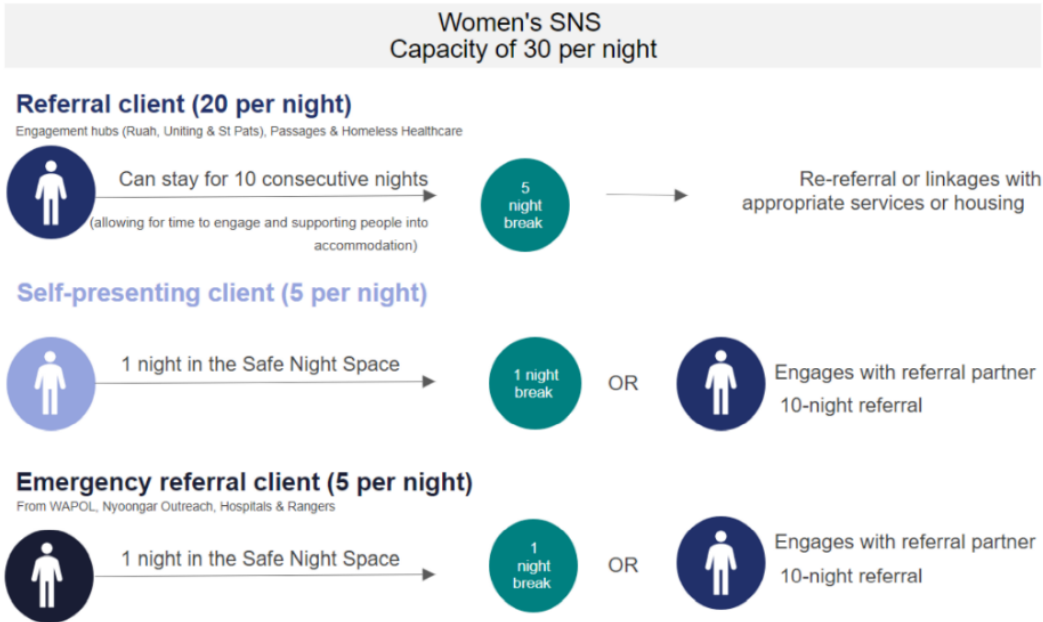
2.1 Safe Night Space for Women

Information on the role of the SNS is described below:

1. Ruah was awarded the Safe Night Space by the CoP, to respond to the urgent need for a safe and culturally secure night space for women who are escaping violence or family and domestic violence who have no other place to go and end up sleeping rough.
2. The service model and planning presented was based on Ruah's 60+ years' experience supporting people experiencing homelessness and women escaping family and domestic violence in Perth. During Homelessness Week 2019 Ruah piloted a SNS for women from the Ruah engagement hub located at James Street, Northbridge.
3. The aim of the service is to provide a safe and culturally secure night space for women escaping violence or in situations of extreme vulnerability in Perth.
4. It is accessible to women during the evenings, seven days a week 365 days per year, and has capacity for thirty women a night. From our experience the demand in winter is higher and therefore due to weather events such as hot conditions or extreme winter conditions the opening hours are adapted to ensure safety of women escaping crisis.
5. Women who access SNS ordinarily are escaping family and domestic violence who would otherwise face being forced onto the streets; women awaiting placement in transitional or long-term accommodation and may include chronically street present women. The specific criteria include:
 - a. Women over the age of 18+
 - b. Women escaping family and domestic violence who would otherwise face being forced onto the streets.
 - c. Women awaiting placement in transitional or long-term accommodation.



- d. Women who have not exceeded their placement time.
 - e. Women who are street-present (rough sleepers).
6. The SNS operates with a low threshold approach, which places minimal demands on the people who use the services. It offers services without attempting to control people's life choices, offering harm minimisation and support to engage with further services and supports when requested.
 7. The SNS takes referral from other agencies, emergency services and walk-ins. Our in-depth understanding of rough sleepers in the cohorts addressed by the proposed services, in conjunction with our service data, has informed our referral modelling.
 8. Our current operational approach at the Safe Night Space (SNS) caters to a maximum of 20 scheduled referrals, 5 walk-ins, and 5 emergency cases per night. In scenarios where our capacity is reached, individuals are directed to alternative services like Crisis Care for support. We encourage those we cannot accommodate to seek safer locations, and we coordinate with local authorities only when necessary to ensure everyone's safety.
 9. Building upon our two years of successful operation at the SNS at Rod Evans and our services at James St, we continue to refine our approach to managing non-admittance. Our experience has enabled us to successfully support people through a variety of options, including the Noongar Patrol, Street chaplains, the HEART team, and providing taxis to safe locations for family or friends. Additionally, our security teams are adept at supporting individuals as they move on, and we can facilitate access to Crisis Care for refuge beds. We maintain strong links with partner organizations and agencies, including WAPOL, ensuring a collaborative and supportive network for those in need.
 10. The SNS model is dynamic, designed to be scalable and responsive to fluctuating demands and crises, such as extreme weather, health emergencies, or other situational challenges. Our adaptability allows us to provide the best possible service within our means, continually striving to expand our capabilities to avoid having to turn individuals away.
 11. The services are be operated in a manner that ensures maximum utilisation so that as many rough sleepers as possible can be off the streets and then supported into housing. We draw on our experience in running services for vulnerable people and continue to actively link with other services in the evenings to fill all available spaces.
 12. For the identified cohorts, the priority is safety from the streets. Most chronic rough sleepers on the streets of Perth are connected in with services such as engagement hubs. After safety, a secondary goal for this cohort is to promote positive outcomes in which people can work with case workers, engage in linked services, and be supported into permanent housing.
 13. This group, once housed, reduced the demand for the service and allow additional people into the service. People who do not wish to engage in formal support, are newly homeless or are from another area and will access the SNS through the self-presenting or emergency pathway.



1. Diagram: Capacity of the proposed SNS

3 Operation of the SNS facility

3.1 Staffing

The SNS is staffed with Ruah workers between 6:30pm and 7:30am each night (client opening hours are 7am – 7pm, with security on-site are from 7pm until 8am). From our experience the demand in winter is higher and therefore due to weather events such as hot conditions or extreme winter conditions the opening hours are at times, slightly adapted to ensure the safety of women escaping crisis.

This structure assures that there are always four staff members present on-site, which is crucial for maintaining safety and managing risk effectively. Furthermore, during peak times or in situations of high demand, we activate our on-call process, which allows us to quickly mobilise additional staff members and leadership (on call) as needed. This includes leaning on other experienced teams stationed at nearby sites, thereby ensuring that we can scale our response appropriately and maintain the high standards of safety and service that we have set. Our proven track record in running the SNS model for over two years gives us the confidence in this dynamic and responsive staffing approach.

All Ruah staff are appropriately qualified and receive regular training and supervision and come with significant experience in the community services sector. They are supported in the evenings by Ruah’s internal on-call system which is staffed by management personnel. During usual business hours Ruah staff also have support from the Housing & Homelessness Leadership Team.

In alignment with our comprehensive understanding of our clientele and our unwavering commitment to their safety, we’ve established a robust staffing mix that ensures the safe management of client flow and intake processes. Our staffing configuration is as follows:

The Ruah team consists of:



1. SNS team leader who works across several sites, located on site for parts of the evening and as needed.
2. Presence of 2 security personnel at all times who are involved in the intake process and work with clients through the evening alongside the Ruah team.
3. 6:30pm – 12:00am / Ruah worker x 2
4. 11:30pm – 7:00am / Ruah worker x 1
5. 12:00am – 7:30am / Ruah worker x 1
6. Additional workers visit to provide specific activities and supports such as medical workers, volunteer support workers, are additional to this core model and support with group activities, at times counselling or specific supports as required.

Moreover, our senior leadership team is not only present but actively engaged in supporting our staff. They regularly participate in team meetings and are available during specific times when targeted support or training is needed. This leadership involvement is integral to our operational success, ensuring that staff feel supported, and that service delivery is of the highest standard. Our leadership's hands-on approach also facilitates a quick and effective response to any emerging needs or challenges, reinforcing our commitment to safety and excellence in client service.

4 Security Management

We have developed a comprehensive response protocol for our security team, addressing incident escalation, site hygiene, external noise management, litter, and abandoned belongings, which are integrated into our management plan:

1. Incident Escalation: Our security personnel are trained to assess situations and escalate incidents according to severity. This may involve direct communication with our management team, engagement with local services, or contacting WAPOL when necessary.
2. Site Hygiene: Security is responsible for monitoring the cleanliness of the site, coordinating with cleaning staff, and addressing any hygiene issues immediately to maintain a safe and sanitary environment.
3. External Noise Management: The team actively works to minimise noise disruptions, implementing strategies such as designated quiet hours and liaising with clients and neighbours to ensure community standards are met while SNS clients rest during the night.
4. Litter and Abandoned Belongings: Our staff follows a clear process for managing litter and belongings left behind, which includes safe disposal of trash and storage or return of personal items when possible, using Ruah's waste management processes.
5. Unauthorised Individuals: For individuals who should not be at the premises, we utilise a de-escalation process and our security work instructions, which have been developed in conjunction with our security team. This includes ongoing joint training sessions to ensure maximum safety and understanding of when to engage WAPOL for additional support.

Our approach is designed to provide maximum safety and efficiency, ensuring a responsive and responsible security presence at all times. Through continuous training and collaboration with our security team, we maintain an elevated level of preparedness to address any security concerns that may arise within the facility.



In alignment with our security strategy and commitment to safety, we have extended our security shift end time to 8 am, ensuring continuous oversight during critical transition periods and adherence to the protocols outlined above.

Composition of the Security Team

1. The facility is staffed by a dedicated security team, comprising of 2 security guards on duty from 7:00 pm to 8:00 am daily.

Role and Responsibilities

1. Subcontracted Security Services – Security personnel are subcontracted to ensure professional, efficient, and effective service.
2. Primary Duties – The core responsibility of our security team is to maintain safety within the facility. Their roles encompass surveillance, risk mitigation, and incident management.
3. Client-Staff Relationship – Based on our experience, we recognise the importance of a positive relationship between the security team and our clients, particularly those who are rough sleepers. Fostering a harmonious environment is crucial for the effective operation of our services.
4. Induction and Familiarisation – Ruah conduct thorough inductions for all security personnel to familiarise them with the facility's procedures, environment, and regular clients.

Training and Licensing Requirements

5. All security staff must hold a valid license in accordance with the Security and Related Activities (Control) Act 1996 and the Security and Related Activities (Control) Regulations 1997.

The security protocol is designed to ensure a safe and secure environment for both clients and staff, fostering trust and respect within the facility.

We have taken a multi-faceted approach to security concerns by integrating a series of proactive measures into our management plan to ensure the safety and orderliness of SNS:

1. The SNS team have an established positive working relationship with the City Watch team and rangers facilitating quick and effective communication. They work closely with Police, Ambulance and other supportive services used as required.
2. Our security personnel are required to remain on-site between the critical times of closure at 7 am and opening at 8 am to maintain continuous surveillance. Security recommence at the Ruah Hub working from 8am through to 2pm so there is adequate coverage of security during the handover period. All hours where there are clients at the James St facility – there is always two security on site at all times.
3. We have instituted a mandatory policy where all individuals must sign an agreement of rights and responsibilities before entering the space, with a time-out procedure for non-compliance.
4. Extra signage is installed to clearly communicate the rules and regulations, the presence of security measures, and the consequences of disregarding the established code of conduct.

Furthermore, the City of Perth's website serves as a resource for broader community services and facilities, offering comprehensive information on security and surveillance, accessible at the following link: [City of Perth Security and Surveillance](#).

For issues beyond our immediate SNS environment, we have established protocols to address community-related concerns:



1. Safe City: For assistance, call 9461 3333.
2. WA Police: For general assistance, call 131 444.
3. Emergency Services: In an emergency involving Police, Fire, or Ambulance, dial 000.
4. Crime Stoppers: To report crime anonymously, call 1800 333 000.

These integrated steps and resources reinforce a secure environment and uphold the highest standards of safety for both our clients and staff. Our ongoing commitment to proactive security management is reflective of our dedication to creating a supportive and secure space for everyone involved in our services.

4.1 Access to the Building

We have established a secure and effective system for monitoring building access, which incorporates a combination of technological and strategic measures:

1. Continuous visual surveillance is maintained through operational CCTV systems, enhancing overall site safety.
2. The architectural design of the building is intentionally crafted to maximise visual surveillance capabilities. This, together with the presence of our trained security personnel and workers, ensures an elevated level of safety, mirroring the successful approaches used at our Rod Evans and James St facilities.
3. The building features a funnel entry design, serving a dual purpose of controlling the flow of people and allowing for the thorough triage and assessment of individuals. This setup is key to ensuring that all clients understand and adhere to their rights and responsibilities upon entry.
4. While we do not offer lockers for long-term storage, to accommodate clients during their time at the facility, lockers for day storage are available to safely house their possessions while they stay the night at the Safe Night Service.

Additionally, to maintain a secure and orderly environment:

1. Security staff are strategically positioned at the hub's entrance, allowing for a clear view of the building's front and immediate surroundings.
2. After our 7 am closure, clients are advised to move to day services, one of which is the Tranby homelessness engagement hub close by in Northbridge which opens at 7am, where women can find further support and services.
3. Client access is managed solely through the front door, which serves as the only entry point, thus simplifying security oversight. The James St facility features two access points:
 2. Main Entrance: Located at the front on James Street, this entrance is primarily for client use. It is managed by security officers at a reception and triage desk. To respect our neighbours, a 10pm attendance curfew is enforced for clients entering through this door.
 3. Staff Entrance: Situated in the rear car park, this entrance is exclusively for staff access and requires swipe card authentication. Staff may also enter through the Main Entrance using the swipe card system.

Together, these measures constitute a comprehensive security system, ensuring the safe access and departure of clients while fostering a secure environment for all who use our services.



4.2 Parking Provisions

Our approach to managing parking and non-admitted individuals in the vicinity of the Safe Night Space (SNS) is comprehensive and considerate of the community's needs:

1. Individuals who may need to rest in their cars often make use of public parking bays or paid parking facilities located nearby.
2. Based on our operational experience at the Rod Evans centre, incidents involving individuals resting in cars near the facility have been minimal and have not constituted a significant concern.
3. We ensure that our Rights and Responsibilities documentation clearly communicates expectations regarding the use of surrounding parking areas.
4. Our security team is vigilant both inside and outside the building, providing guidance and assistance to ensure individuals are aware of parking protocols and maintaining a secure environment for all.
5. We acknowledge that there is no street parking available directly across from the SNS, as these are reserved for WAPOL vehicles.

Through proactive engagement and clear communication, we aim to uphold a respectful coexistence with those who use nearby parking while ensuring the safety and well-being of our clients and the local community.

Staff Parking: Designated secure parking for staff is available at the rear of the building.

Client Transportation: Most clients are expected to utilise public transport or walk to the facility. Clients with vehicles are advised not to park directly in front of or adjacent to the facility. They are directed to alternative parking options in the nearby James Street and wider Northbridge area, with staff providing information on more affordable parking solutions.

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4.3 Deliveries and Suppliers

1. Parking for Deliveries: Suppliers and delivery personnel use the rear parking area of the building.
2. Delivery Access: They are required to present themselves at the Main Entrance. Deliveries generally consist of general office supplies and food items.

4.4 Servicing and Cleaning Plan

The facility works using a comprehensive servicing and cleaning strategy, combining internal efforts with contracted professional services to uphold a high standard of cleanliness and safety. Our James St facility is dedicated to upholding a high standard of cleanliness and safety, reflective of the established protocols at Rod Evans:

1. Hybrid Cleaning Approach: Routine operational cleaning, including the kitchen and communal areas, is managed by our in-house staff. This ensures day-to-day maintenance is attentive and consistent.



2. **Contracted Cleaning Services:** For deep cleaning and specialised tasks, we use professional cleaning services. Their expertise ensures the facility meets the highest hygiene standards through regular and comprehensive cleaning sessions.
3. **Rubbish Management:** We support personal responsibility for rubbish disposal and enhance this with additional general waste bins requested from the City of Perth (CoP).
4. **Handling of Illegal Items:** Consistent with our commitment to safety and legality, any illegal items found are promptly surrendered to WAPOL.
5. **Biohazard Management:** We maintain on-site biohazard bins, with a focus on sharps disposal. Staff are extensively trained in the safe handling of sharps and biohazardous waste.
6. **Periodical Pressure Cleaning:** Our cleaning regime is supplemented by scheduled pressure cleaning for the facility's exterior, coordinated with the CoP, to address any potential health hazards from residues.
7. **Staff Training:** Comprehensive training on biohazard management is provided, ensuring staff are well-equipped with knowledge on safe disposal practices and the use of PPE.
8. **Exterior Monitoring and Disposal:** Vigilant monitoring of the facility's exterior is undertaken to identify and manage unattended or unwanted personal items, with appropriate disposal or secure storage as required.

This approach integrates our proven day-to-day operations with external professional services to provide a clean, hygienic, and safe environment at the James St facility. Our strategy is designed to be responsive and responsible, maintaining the well-being of our clients and the broader community while continuing our practices of environmental cleanliness and public health.

5 Outdoor Cleaning

Ruah continually monitors the frontage and report on the maintenance of the outdoor areas at the facility. Recognising the importance of a clean environment for all, we are monitoring the public footpath in front of the building. Our staff and security are vigilant in removing any rubbish that may accumulate directly outside our facility to maintain a presentable space for both our clients and the community.

Ruah provides periodically deep cleaning services as needed. Ruah is attentive to the condition of the premises and will continue to remain responsive to any significant issues that may arise. Ruah acknowledges that the maintenance of the footpath falls under the jurisdiction of the City of Perth, and Ruah reports any concerns that may require the City's attention.

6 Risk and Complaint Management of Activities on Site

The facility includes a robust framework for managing risks and addressing complaints, ensuring:

1. A safe environment for both clients and staff
2. Transparent and accessible complaint resolution processes
3. Regular reviews of safety protocols and risk management strategies.



6.1 Ruah's Management Approach

Ruah has a robust Quality Assurance system in place that ensures compliance with all Quality Assurance requirements. Organisational and strategic risks are monitored by a Risk and Quality Team, reporting to senior leadership and Ruah's Board through a Risk and Quality Committee (comprised of Executive and Managers) that meets regularly (at least every six weeks), and a Finance Audit and Risk Committee (comprised of Ruah directors, CFO, CEO, Finance Manager, and Risk and Quality team) which meets bi-monthly.

Ruah uses Microsoft SharePoint systems, which are cloud-based, secure, and can be accessed by all workers for management and control of policies, procedures, and documents; reporting incidents, hazards, feedback, and quality improvements, with automated email notifications and escalation; and auditing.

Ruah's business activities are open, transparent and comply with the City of Perth's Statement of Business Ethics, relevant legislation and the City's policies, procedures, and practices. We employ appropriately qualified workers who demonstrate a high-level of commitment to good process and discipline. Ruah also has a vigorous training culture and promotes individual professional development.

Ruah's financial systems and procedures are continuously reviewed to ensure they are accurate, efficient and fit-for-purpose. Ruah's financial systems are secure and cloud-based, and provide appropriate access for workers, based on positions and security levels. Ruah undertakes interim and annual financial audits and was issued with an unmodified audit report with no recommendations for the FY2020.

Ruah was assessed against the National Standards for Mental Health Services and the National Safety and Quality Health Services Standards in November 2018 and achieved certification through to January 2022. Ruah also recently achieved Rainbow Tick Accreditation and anecdotal feedback was that we had set new benchmarks.

Ruah has many strategies in place to mitigate risk and ensure a safe environment for staff, clients, and the community. Ruah is committed to the health and safety of our people and the environment around us.

Our corporate-wide framework straddles our use of the space and is aligned to AS/NZ 31 000:2018 Risk Management Guidelines and includes the following components:

1. Delegation of Authority
2. Risk Appetite Statement, with zero tolerance for safety risks
3. Risk Management Procedure and Process Chart
4. Risk Matrix: supports consistent assessment of risk.
5. Safety Management Procedure
6. Critical Incident Process: reporting, investigation, and review
7. Risk and Quality Committee
8. Organisational Risk Register and Strategic Risk Register

Collectively, the framework ensures that Ruah understands, monitors, and manages the risks associated with the type of work that Ruah does.



6.2 Specific Management Strategies for the SNS

Ruah addresses the specific areas of concern through the following management strategies:

6.3 Managing Noise and Other Disturbances at the SNS

To maintain a peaceful and respectful environment at the facility, particularly in consideration of our neighbours and the local community, we have implemented a comprehensive strategy to manage noise and other disturbances:

1. *Security Personnel Contracting* – Ruah employs a team of contracted security personnel, ensuring a professional approach to facility safety and disturbance management. Two security workers are on site at all times.
2. *Monitoring and Patrols* – Security staff are tasked with monitoring client behaviour both within and external to the premises, conducting regular patrols to maintain order and address any potential disturbances.
3. *Security Licensing* – All security personnel are licensed in compliance with the Security and Related Activities (Control) Act 1996, ensuring that they are qualified and trained to handle various situations that may arise.
4. *Incident Escalation Procedures* – An established procedure is in place for incident escalation, including the management of clients who may refuse to leave the premises, to ensure that any disturbances are resolved in a safe and effective manner.
5. *Staff and Security Collaboration* – During operational hours, our staff and security team work closely together to promptly address any concerns or disturbances, ensuring a harmonious environment for all.
6. *Mandatory Security Presence* – At least two licensed security professional is on-site during all operational hours to oversee and manage the facility's environment.
7. *Client Responsibilities* – All clients are required to agree to a Rights & Responsibilities form upon entry, which outlines expected behaviours and mutual respect for property and individuals, both inside and outside the facility. Clients unable to adhere to these expectations are required to leave and must engage in a discussion with a senior worker upon their return to address their behaviour.
8. In our continued efforts to minimize antisocial behaviour and disturbances, we have proactively installed clear signage at the front of our premises. This signage, which is prominently displayed on the window, provides guidelines for public incident reporting and outlines the escalation processes. This initiative is part of our ongoing commitment to maintain a secure and community-friendly environment.

Through these measures, the SNS aims to effectively manage noise and disturbances, ensuring a safe, respectful, and peaceful environment for clients, staff, and the surrounding community.

6.4 Immediate response protocols for out-of-hours

We have a structured approach to managing complaints, ensuring that all concerns are handled promptly and effectively:

1. *Urgent Complaints and Safety Concerns*: In situations where there is an immediate concern for safety or other urgent complaints, we advise individuals to directly contact the Western Australia Police (WAPOL). This protocol is in place to ensure that any serious issues are dealt with in the most efficient and appropriate manner, with the assistance of law enforcement when necessary.



2. Complaints Policy and Procedures: Our policy outlines the specific steps to be followed when a complaint is lodged. It defines the process for escalating issues and ensures that every complaint is given due attention.
3. Non-Urgent Complaints: For complaints that do not require immediate attention, complaints (which could be in connection to a client or the services that Ruah provides) can be made via the feedback form via the website, calling 13 RUAH (who direct the complaint to the appropriate service/area), or emailing connecting@ruah.org.au or feedback@ruah.org.au.
4. This system can be accessed through the Ruah website and allows for a structured and traceable way to manage and resolve issues.

6.5 Managing Removal of Unwanted or Unattended Personal Belongings

The following measures are in place to manage the removal of unwanted or unattended personal belongings:

1. Clients must agree to our Rights & Responsibilities policy, which emphasises maintaining a clean environment within and around the facility.
2. Clients are expected not to leave rubbish or personal items unattended; non-adherence necessitates a discussion with a senior staff member upon their next visit to address this behaviour.
3. Ruah staff routinely check for and clear any unattended items left in front of the property. Disposal of such items are managed sensitively, with storage options provided for larger belongings.
4. Secure outdoor storage crates for larger items and lockers for smaller valuables are available to clients. This aims to minimise clutter and maintain orderly surroundings.
5. Signage at the front of the property informs clients of our cleanliness standards and the protocol for unattended items, which are subject to removal during regular inspections.

6.6 Management of Congregation and Queuing

The following measures are in place to manage any potential congregation and queuing of clients:

1. Signage directs clients to alternative services during non-operational hours and request that clients refrain from gathering outside the facility when it is closed.
2. Due to local planning law and regulations, clients are not able to smoke around the back of the building. They often gather close by to the carpark on the side of the building to limit impact to surrounding private property.
3. The Rights & Responsibilities policy has been amended to include a clause urging clients to respect our neighbours' comfort by not congregating around the Hub when it is not open. This document has been amended to note clients they cannot present earlier than 15min prior to the service opening to limit disruption and congregation.
4. During operational hours, security personnel manage client flow and queuing to ensure orderly access to the facility and minimise any disruption to the local area. Doors open at 7pm sharp and clients promptly enter after that time.



5. Clients who congregate outside are invited in during open hours or asked to move on respectfully. Persistent refusal is managed according to our incident escalation procedure, ensuring the well-being of all parties involved.

This plan reflects Ruah's commitment to responsible property management, respecting our clients' needs while ensuring the safety and cleanliness of the community space around the facility.

6.7 Management of Clients Not Suitable for the SNS

When clients present to the SNS, it is possible that the service may not be suitable for everyone and their needs. SNS is a low-threshold service, meaning people can come in under the influence of drugs or alcohol, as long as their behaviour does not negatively impact others. It is an open space, not individual rooms, which is also not suitable to everyone's needs and this may be because they have been impacted by trauma and not able to be around other people. Clients may also present unwell or injured and therefore require medical care, including hospital-level care.

Staff assess clients on a case-by-case basis and provide one of a range of responses dependent on the situation. These may include:

1. Requiring another service (e.g., Alcohol and Drug substance use or mental health) – staff contact relevant services as required.
2. Disruptive or violent behaviour – managed by security staff and contacting Police if needed.
3. Significant injury or illness – arrange transport to hospital including calling an ambulance.

In all of the above instances, SNS staff and security are to take reasonable steps to prevent the client who is not suitable from remaining in the vicinity of the facility.

6.8 Management of Antisocial Behaviour

Antisocial behaviour is not tolerated both within the facility and in the exterior vicinity of the building. The overall objective is to maintain a safe and disturbance-free environment for staff, consumers, and local residents adjacent to the service.

Measures to support this objective are:

1. All clients are required to complete a Rights & Responsibilities form, which outlines our expectation of them and what they can expect from us. We ask that people: Respect others and property, inside and outside of the facility; If for whatever reason clients are not able to do this, they are asked to leave and next time they return, they must meet with a senior worker to discuss and address the behaviour.
2. CCTV cameras cover all main internal areas and the externally areas adjacent to the building.
3. Ensure that a minimum of 2 licensed security personnel is on-site during operational hours. They are be stationed in the hub on the ground floor and where possible, also patrol the exterior of the building periodically during the night. They are also available to respond to any client incidents that occur either within the building or in the immediate exterior vicinity of the building.
4. All SNS staff are be trained in de-escalation techniques. Clients who behave in a manner deemed unsafe or fail to comply with our Code of Conduct will be subject to a temporary suspension from our services to ensure the safety.



5. Ruah and the SNS have a formal relationship with WA Police, ensuring responsive support from Police where this may be needed.
6. There is an on-call system to provide senior-level support in the event of any incidents.

Loitering, in the context of our community guidelines and service operations at Ruah, is defined as the act of remaining in a particular public place for a protracted time without a clear purpose or activity. This does not include activities such as smoking, waiting for services, or being outside the building for a specific reason, such as having a cigarette.

Ruah is committed to minimising loitering around the facility. We recognise, however, that clients may be present outside the building as they wait for services or partake in smoking. Staff and security manage and monitor this to ensure safety for all.

Clients who self-present and gain a referral from a day centre attend the service at 7pm and must attend by 10pm. For emergency situations, clients can attend through the night when supported to the service via an emergency service. The clients who present in emergency presentations come based on need and attend through the front entrance. Based on our experience at Rod Evans, SNS allocated 5 placements for clients who were coming in emergency situations through police or ambulance. Therefore, the large majority of the clients present before 10pm and are settled for the evening at the SNS.

By distinguishing between loitering and the legitimate use of outdoor space by our clients, we aim to maintain a respectful and orderly environment while also being mindful of the needs and behaviours of those we serve.

7 Local Engagement and Complaints

7.1 Engagement with Local Businesses and Residents

The facility is situated in an area that contains a number of existing businesses and residents.

The services in this facility have been designed to co-exist with the local community and to play a positive part in improving the amenity and safety of the area. Ruah is committed to ensuring there is no antisocial behaviour in the vicinity of the building and ensure appropriate management of the surrounding area. Strategies such as security patrols, lighting, CCTV, and procedures to minimise disruptions after-hours are part of the approach to managing this important relationship.

Through these strategic engagements and security measures, we are committed to upholding the well-being of the community, ensuring the safe operation of our Hub, and maintaining a harmonious and mutually beneficial relationship with all local stakeholders.

7.2 Complaints Management

As part of operating this facility we take in complaints as a part of the quality improvement process. Listening and early communication is key to resolving concerns with clients, neighbours, and the community. Complaints (which could be in connection to a client or the services that Ruah provides) can be made via the feedback form via the website, calling 13 RUAH (who direct the complaint to the appropriate service/area), or emailing connecting@ruah.org.au or feedback@ruah.org.au.



Regarding after hours issues for the service or surroundings, the community are encouraged to call the Police if the matter is urgent.

HaDSCO is an independent state government agency providing a free impartial resolution service for complaints relating to health, mental health or disability services in Western Australia and the Indian Ocean Territories. If you are unhappy with the response from the service or feel uncomfortable approaching the service directly you can contact the following services for assistance: [Health and Disability Services Complaints Office \(HaDSCO\)](#) 08 6551 7600 or Free Call [1800 813 583](#)

[Both the SNS and the Ruah Hub are funded by the Department of Communities. The Department of Communities is another escalation point for complaints. These can be made through phoning 1800 333 325 or through their website at the following link. <https://www.wa.gov.au/organisation/departments-of-communities/departments-of-communities-housing-complaints-and-feedback>](#)

Ruah welcomes all feedback as an integral part of continuous quality improvement and endeavour to resolve complaints in connection to the services that Ruah provides. There may be issues outside our control, for example issues that occur not on Ruah property but that in some ways are related to Ruah, thus as part of the complaint management process, we would make reasonable efforts to resolve issues with stakeholders involved. We have reviewed our complaints management process which ensures that complaints are risk rated and escalated according to seriousness and frequency.

Further to this, Ruah have designed and display signage that outline where to direct feedback during operational hours.

7.3 Engagement with Local Residents for the SNS

The facility is located within a mixed-use area that includes residential properties. Recognising the importance of harmonious coexistence with our neighbours, the SNS service has been conscientiously designed to enhance the local community's safety and amenity. Our management strategies include the implementation of security patrols, enhanced lighting, and CCTV systems to foster a secure environment. Additionally, we have established protocols to minimise any potential disturbances during the after-hours operation of our services.

As part of our commitment to community engagement, we have built on our current processes at James St and have plans in place to continue the formation of a SNS Community Advisory Group (for James Street). This group serves as a platform for continuous dialogue and collaboration with local residents and stakeholders. The group's terms of reference have not been formally set, but are likely to encompass:

1. Disseminating information about the SNS service and discussing matters that may affect both the SNS and the local community.
2. Engaging in consultation regarding operational aspects of the SNS that could potentially influence the residents' quality of life.
3. Providing a channel through which community concerns can be communicated, addressed, and tracked systematically.

Our approach to local engagement is comprehensive, aiming to maintain a positive relationship with businesses, residents, and WAPOL enforcement. Our internal practice guides detail information and practical guidance for staff on the following specifics which relate to how we work in the SNS model. Our procedures for managing disruptions after



hours include immediate communication with our security team and, when necessary, engagement with the local police. Specific details outlined below.

1. **Frequency of Engagement:** We engage with the local community on a regular basis, scheduling monthly meetings and additional sessions as required. These engagements are an essential part of our operational calendar, not only to address concerns but also to proactively discuss our impact on local amenity and gather feedback.
2. **Reasons for Engagement:** The primary reasons for our engagement are to foster a collaborative relationship with our neighbours, to keep them informed of our activities, and to address any issues they may experience as a result of our operations. This includes discussing any community benefits we can provide and understanding their perspectives.
3. **Proactive Engagement:** Our engagement goes beyond the reactive complaints process. It is an initiative-taking effort to maintain transparency and to mitigate any potential disturbances our Hub might cause. Regular dialogue helps to pre-empt issues and sustain a positive community presence.
4. **Security Strategies and Extent:** Our security measures, including patrols, and CCTV, are implemented not only within but also around the perimeter of our building. The goal is to deter antisocial behaviour and to minimise disruptions after hours. These strategies extend to the immediate areas surrounding the facility where our clients and the local community interact. We have recently installed additional lighting to further increase visibility and therefore increase safety around the area.
5. Our security personnel conduct regular patrols that extend around the entire perimeter of the building. These patrols are not confined to the structure itself but also cover adjacent areas to ensure a comprehensive security presence. This proactive approach allows us to address concerns and potential issues before they escalate.
6. In the event of an incident, our procedures include immediate assessment via CCTV, engagement of security personnel to the location, and if necessary, prompt communication with WAPOL.
7. Our CCTV system has high visibility and covers the entire site. The cameras are positioned strategically to monitor all activities, providing real-time tracking capabilities. This allows us to swiftly respond to any incidents and maintain a secure environment.
8. We have a direct line with our regular contract at WAPOL, with whom we communicate frequently—often daily—to continue our positive relationship and ensure a coordinated response to any incidents.
9. **Complaints Policy:** For non-urgent issues, community members are encouraged to use our online system to register complaints, which allows us to track and systematically address each concern. For urgent matters, especially those concerning safety, the direct engagement with WAPOL is advised.
10. **Direct Police Engagement:** We maintain a direct and responsive relationship with WAPOL, ensuring that any antisocial behaviour or safety issues are promptly communicated to the appropriate authorities, leveraging our established rapport with the sergeant in charge.

Through these measures, we aim to ensure that the SNS is not only a safe place for our clients but also a responsible and responsive neighbour to the residents of the area.

8 Review

This document undergoes regular reviews (at least annually) to remain aligned with evolving community needs and service delivery standards. Significant changes will be communicated to relevant stakeholders, then submitted to the City of Perth.

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Submission	Comment
1	Although I believe the City of Perth could be doing much more this is a start and I support this.
2	<p>I strongly condemn and oppose the development of a third homeless service within the same block as this would cause additional stress and financial hardship to me and the business in the area.</p> <p>When I moved into our apartment three years ago there was 1 homeless shelter and I was happy with that as I didn't want to be a NIMBY like Rita Saffioti. However a third homeless service on the same block is getting a bit ridiculous, ghettoising the block and creating an unsafe environment in the park, the businesses, and for people trying to access police services.</p> <p>When Rita Saffioti opposed the local community and government's wishes by approving the drop-in centre she obnoxiously quoted that Northbridge aimed to be a dynamic community and she was making the community more dynamic by adding a second service on the same block. This third service is the opposite of dynamic and should not be concentrated in the same area.</p> <p>If you look at the best suburbs, the best classrooms, the best cities, they are made up of a diverse range of people. By concentrating all the homeless services in one area you are demolishing that and creating an unsafe environment for people at their most vulnerable and shutting down multiple businesses.</p>
3	<p>I wholeheartedly support the development application proposal for the additional use of a Safe Night Space for Women within the existing Community Center. This initiative demonstrates a proactive and compassionate response to the unique safety concerns faced by women, providing a secure and welcoming environment for those in need.</p> <p>The integration of such a space within a familiar community setting not only addresses safety concerns but also fosters a sense of inclusivity and support. By approving this proposal, the City would be contributing to creating a community that prioritizes the well-being and security of all its members, ensuring that women have access to a refuge during times of vulnerability.</p> <p>This thoughtful expansion aligns with a collective commitment to fostering a safer and more compassionate community for everyone.</p>
4	I have been in Northbridge for over a decade now. It's my second home. I heard about a new homeless service centre that wants to open on James Street in Northbridge. We have a lot of trouble already, people stealing, fighting and spitting in and outside our stores. We are sick and tired of this as no one does anything to eliminate it. And now this mad house homeless centre wants

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	<p>to come to northbridge will only make things worse. Instead of sending them away from the city? They become zombies, with nothing to do and no money, they will start causing more trouble, more violence and only the businesses around will suffer as no family or individuals will want to come into the area.</p> <p>These homeless people are always passing out on the side walk. We call the cops, the cops come and give them a move on notice, but that's only temporary, they always come back. It's like the TV series (the walking dead)</p> <p>I came back from Europe last week, I stayed there for a month travelling around. Not once have I seen this kind of filth on the streets. Yes they are people, but we are people as well. We just want to trade in peace and go home to our families.</p> <p>We urge the city to decline the proposal of a homeless shelter as we, the business owners in Northbridge will not accept it. Why should we pay our taxes? so that these people get to bum around and cause trouble, why? Is it because we are a democracy? Is this democracy? We don't see this in other countries, why here. What are the foreigners going to say or already saying about the city?</p> <p>I know it's got nothing to do with you personally, however we are really tired of the situation in Northbridge and with a new centre opening up on James Street, it will only make our neighbourhood a lot worse. We also know that the lord mayor Basil is doing the best he can to stop this madness from happening and he has our full support.</p>
5	<p>While I sympathise with the women sleeping rough, I don't believe RUAH has the capacity or capability of managing a safe night space while keeping the local residents, business owners and their customers safe. What I have witnessed since RUAH moved into James Street is not conducive to giving me the confidence that we will not have further anti-social behaviour that we will need to deal with. It was exactly the same when they operated out of John St, nothing has changed and the conditions placed on them have been largely ignored.</p> <p>Having to deal with the bad behaviour, the spitting, stealing food off patron's tables and abuse from their clients while their staff and security just look on and do nothing is bad enough. To have this situation turn into a 24 hour issue is beyond reasonable.</p> <p>I understand that the Uniting Church has a facility already ready to go, why is this option being overlooked? I can see that RUAH is once again playing politics and John Carey is leading the way. The available funding is substantial and I can understand why RUAH is chasing it. I am under no illusion that this is not a business deal, RUAH's business is homeless people, and they have many volunteers doing great work. What everyone fails to see is the salary of the CEO, management and staff who make a good living off disadvantaged people.</p>

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	<p>As a land holder who owns property across the road from RUAH, I DO NOT want to see this organisation operate for any longer time period that was initially granted even after it was rejected by council and residents. Do residents and business owners have any rights left at all to enjoy their home and businesses without threat and abuse? Or is politics once again going to play the upper hand and bully their way to gain a few more votes?</p>
6	<p>I strongly oppose any extension of hours and /or any variation to the Minister’s approval and accordingly, ask the City of Perth to outright reject the application by Ruah , as approval would have a serve and dire impact on the local amenity , businesses , residents and future expansion of the precinct .</p> <p>Namely, I refer you to my initial object to the DA in which Ruah had sought for the subject property back in early 2022 and which was rightly refused by council and ultimately approved by Ministerial intervention in September 2022 . The objection detailed significant concerns, most of which were also raised by many and numerous other objectors, to Ruah’s application.</p> <p>Since the Ruah operation has been in force at the subject property (which is less than a year) , there have been numerous issues /events relating to anti-social behavior , noise pollution , increased loitering and cleanliness , police and rangers called out frequently ,all of which do not bode well in providing for a safe , clean and inviting precinct.</p> <p>The City has a responsibility , irrespective of their planning scheme preferences , to ensure that the community is catered for in line with the Objectives and Intentions of the Scheme and I refer you to Section 3.5 and 6 of that Scheme .. I am aware the City has been provided with numerous footage of anti-social behavior and I urge you to avail yourself of that footage , it will give you an idea of what is really going on and what the residents and small businesses(including a hotel) in the immediate proximity ,are enduring .</p> <p>Another point of contention is whether the " Preferred Use", under which Ruah is seeking approval for, in such a built up commercial and residential precinct, along arguably Northbridge's premier and most prolific thoroughfare, needs to be dealt with by delegated authority in the first instance .Something of such a sensitive issue should be advertised and be dealt with by council not delegated authority . Whilst having the upmost respect toward the City’s planning personnel, the long term ramifications, in recommending approval , in the specific location are such that warrant much more scrutiny and should be considered by the members that represent their constituents .</p> <p>Ruah reiterates that the proposed current Ruah centre at 247 James ,which will accommodate the Safe Night Space (SNS) us only 200 meters from their current location , this should not make any difference in determining the application, especially given the</p>

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	<p>SNP did not operate at their previous location in Shenton St and this was noted as NOT in the Ministers Approval Notification and as being a service that Ruah was going to replicate ,at 247 James.</p> <p>The negative impact to the community would clearly outweighed any benefit and further derailed any potential benefit ,to be derived from major infrastructure and development projects currently underway. These projects are obviously designed to revive the precinct, attract new businesses and encourage ongoing development, resulting in more inner city living and the creation of a safe and vibrant environment , inviting enough to welcome back local families and tourism and support the existing and new businesses ,who will be ultimately drawn to the area. As I am sure council is aware the original approval of the Centre resulted in the abandonment of 14 level mixed use development at 237 James , with the precinct now perceived as an undesirable location to undertake investment.</p> <p>Ruah continue to make a point of being located next door to the police station – I am not sure if they have completely comprehended that this police station is not a walk in facility that has police at the readiness . I have had to ask Ruah clients to move off my property on numerous occasion (some are now even sleeping there and this had never happened before in over 25 years of owning the property) and I have been sworn at , spit at and threatened . On some of these occasions, I immediately went into the police station (same one Ruah are referring to) and asked the officer at the front desk if he/she could call someone to come out and assist -I was told , this is not an operational station , you need to call 13444- so I am not sure how having a non-operational police station is going to help with anti-social behavior.</p> <p>Ruah cannot even control the issues they have now and they want to take more on. We have questioned their management plan on numerous occasions and yet to hear back from anyone – it seems no one cares about these small businesses and residents , who have worked so hard for many years to build a future for their families and now having to put up with this. When they first moved in, they asked us to meet with them and we did . They said they wanted to be good neighbors- we put forward some ideas in trying to control potential issues ,we suggested not to issue paper cups or allow them to take them out of the facility , given many of their clients just toss them on the pathing , we asked them to have an external security guard (which I was told was going to be the case) and they did for a few weeks , then gave up . We asked them to break up loitering and congregating clientele but they said , not their problem – any issues , we need to call council or police . We asked them to have their clients not leave any baggage /bikes etc on the footpath -originally they sought to address this but this now seems to have stopped.</p> <p>I recommend councilors and planners spend a few hours at the front of Ruah and see what is really going on and what we are being subjected to – only yesterday I was there and the police charged 2 people going crazy that just came out of Ruah.</p>
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	<p>A number of small shops have closed down and even the police are against this – many have them stopped going to the café directly opposite Ruah and go further down the road, to avoid all the nonsense. There is screaming, swearing, fighting carrying on , bikes dumped at the front , people attending with dogs off leashes (council rangers have been called on numerous occasions) and people now sleeping overnight around the property , awaiting the facility to open. When they leave the facility they all hang around and dump their coffee cups and rubbish everywhere. It has now become a big meeting hub, where they all congregate.</p> <p>I am continually having to clean rubbish from the front of my property and wash the paving as it smells of urine - again , never had this problem before they moved in .There is fighting , swearing , people with unleashed animals, bikes, bags and clothing scattered over footpaths and not to mention people laying and sleeping across the footpath – all of which will just increase if Ruah obtains approval . The big picture here is that the additional hours will not only draw a few woman, as Ruah says, but many others will follow , including men and this has been proven to be so at Rod Evans Centre . Those that don't get in , will ultimately just sleep / set up outside the property or in the immediate proximity . Overtime more and more will join them and they will just filter all over Northbridge.</p> <p>Makes no sense for council to spend scarce rate payer money on infrastructure and beautifying the area , if ultimately , non-one wants to come there – there are so many competing offerings where people , whether it be individuals, families , locals and or tourists can enjoy a day out , without them feeling unsafe , unwelcomed and unappreciated , unlike what Northbridge and parts of the City is offering.</p> <p>I know the proprietor (property redacted) is at their “wits end “ dealing with the fall out of the current Ruah operation and if this goes through he has told me that he would seriously consider closing up , which would leave a large void in the precinct and ultimately there would be reduced patronage to the suffering small businesses (cafes etc) located in and around the hotel and apartment complex.</p> <p>I cannot see how council unanimously voted out the original Ruah application (I commend them for doing so – it was a difficult decision for such a delicate issue but common sense prevailed) on the basis of serious concerns and can now , having solid evidence that those concerns have come to fruition , approve Ruah’s current application.</p>
7	<p>I am writing to you out of concern after receiving a letter from Ruah Community Services that they have put in an application with City of Perth to open their Safe Night Space program at their existing hub on 247 James Street, Northbridge.</p>

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	<p>Though I morally support Ruah and the services they provide to the community it feels their services in the area are becoming too dense to this part of Northbridge and a 'safe space' so close to the heart of the entertainment centre of Northbridge is a bad location to keep women at risk safe. It is also unappealing that the management around operating this space focuses on creating a less inviting environment with CCTV, enhanced lighting, and security patrols.</p> <p>I don't agree with the council's decision of the closure of the program at Rod Evans Centre, and I do have empathy for Ruah's desperation to find a solution but I don't think more services in this end of Northbridge is the answer. It'll become more of a slum with the centre being open at all hours and security patrols and lights at night... The current environment and being a entertainment precinct just seems like the worst possible place to set it up.</p> <p>I hope you consider not approving this application and that you are able to assist Ruah in finding a suitable space in this electorate or another.</p>
8	<p>The City Of Perth, at the time, agreed it was the wrong place for their intended use.</p> <p>For the same reasons presented at that time I even more strongly object to the proposed changes to the decision which was forced on the City Council then.</p> <p>Because of social problems and safety concerns to local residents and to business it is the wrong place for the proposed use.</p> <p>A more suitable site needs to be found for homeless people.</p>
9	<p>I refer to your request for Community Consultation relating to Ruah's application to the City of Perth proposing an additional use of a safe night space for women at 247-249 James Street Northbridge, which I, together with the residents, businesses and their patrons in Northbridge, strongly object and oppose additional use together with any extension of hours at the 247-249 James Street Northbridge premises.</p> <p>The City of Perth needs to refuse Ruah's additional use and extended hours application as it has been eminent and proven that the existing use at 247-249 James Street Northbridge has severely impacted the residents, businesses and their patrons in Northbridge, all of whom strongly oppose any proposed extended hours and additional use of the premises.</p> <p>Ruah's presence at 247 – 249 James Street Northbridge has caused numerous issues for the residents, businesses and the community in Northbridge. As a result of the numerous issues that have arisen, the City of Perth to has implemented "City Watch" "See It" "Say It" as there have been continuous issues with loitering, obstructing footpaths, rubbish and beggars.</p>

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	<p>The City of Perth have undertaken their duty of responsibility to the Northbridge residents, businesses and patrons, with implementing their “City Watch”. I am required to continually call City Watch requesting Ranger assistance to attend loitering, footpaths being obstructed, rubbish and beggars.</p> <p>Residents, small businesses and landlords have worked hard to build a future for their families and to maintain a vibrant and safe Northbridge precinct.</p> <p>As a property owner in Northbridge, tenants have raised concerns regarding Ruah’s presence and the proposed application for additional use and extended hours at 247 – 249 James Street Northbridge.</p> <p>The City of Perth needs to continue to commit to maintaining Northbridge as an entertainment precinct, a safe and family friendly environment.</p> <p>I work in Northbridge and see first hand the current issues and any further use of the above premises or extended hours will exacerbate the many issues already faced by the Northbridge residents, businesses and local community. As a result of Ruah’s current presence, the residents, businesses and their patrons, and the local community have witnessed and been subjected to anti-social behaviour, loitering, seen rubbish abandoned and concerns for safety. The City of Perth needs to avoid exacerbating the issues already existing, therefore, reject Ruah’s application for additional use and extended hours at 247 – 249 James Street Northbridge.</p> <p>Again, the City of Perth must reject Ruah’s application for the additional use together with any extension of hours at the 247-249 James Street Northbridge premises.</p> <p>Always striving to create a better, stronger and safer Northbridge and wish to thank the City of Perth for their support from all the residents, businesses and the local community of Northbridge, who are working together to better Northbridge and attempt to restore and maintain Northbridge as an entertainment precinct, a safe and family friendly environment.</p>
10	<p>I wish to strongly object and oppose Ruah’s application for additional use and extended hours at their 247 -249 James Street Northbridge premises, and ask the City of Perth to outright reject their application as approval would have a serviere and dire impact on the local community, businesses, residents of Northbridge.</p> <p>Since Ruah opened at 247 – 249 James Street Northbridge, there has been numerous issues relating to anti-social behaviour, noise pollution, increased loitering and uncleanliness, which has had a severe impact on the residents, businesses and patrons in</p>

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	<p>the vicinity of Northbridge. Any further use at these premises will only cause continual and more problems for the hard working small businesses and their patrons, the residents and the local community.</p> <p>The numerous issues that Ruah’s presence have created will only be enhanced with Ruah’s application for proposed additional use and proposed extended hours, therefore, in City of Perth must reject Ruah’s application.</p> <p>Ruah’s presence have many residents, businesses and their patrons, together with local community, who are already dealing with the anti-social behaviour, rubbish and fear of their safety and they are concerned that any approval for further use together with any extended hours will intensify all the existing problems.</p> <p>The City of Perth must work together with the residents, businesses and their patrons, together with the local community to ensure Northbridge remains an attractive, safe and vibrant precinct for the residents, businesses and their patrons and the local community.</p> <p>Again, as a result of the many issues and strong objections from the residents, businesses and their patrons, and the local community, the City of Perth must reject Ruah’s application for additional use and extended hours at 247 – 249 James Street Northbridge</p>
11	<p>Reports from the Rod Evens Centre (who's clients are being redirected to the Ruah Centre located at 247-249 James Street) will wholly exacerbate the anti-social and mis-management issues currently being experienced at 247-249 James Street Northbridge. I believe the City of Perth should be asking the Ruah Centre management to provide their Ruah report of the 247-249 James Street operations to understand their negative behaviour statistics before embarking on any decision regarding the operating hours of the RUAH Centre in Northbridge</p> <p>I have lived at my property located since 2006 which during this time have been approached by the City of Perth to be a 'gracious neighbour' by allowing later noise curfews to cater for events such as FringeWorld Festival, Metro's Nightclub, Other local Special Events (St Patricks Day), other Russell Square events to which I, as a ratepayer have happily agreed to, as the requests have been fitting to the location of the entertainment precinct events and the City's vision for the P1 Northbridge Precinct.</p> <p>Firstly I should state, that since the change of use for 247-249 James Street Northbridge, the neighbourhood has suffered greatly at the hands of serious anti-social behaviour, increased littering, loitering, Ruah Centre and neighbouring property damage, increased thefts, abusive outbursts to innocent bystanders / local cafe customers, (unprovoked) attacks on passers-by, pedestrians, visitors to our state / country from overseas visitors staying (across the road) at Best Western Northbridge. It</p>

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	<p>should be noted that as a direct result of the RUAH clients poor behaviour and anti-social activities, the previously established businesses across the road from RUAH (247-249 James St) have terminated their leases due to their customers being deterred from being in the location where the anti-social / abusive attacks are becoming more and more frequent.</p> <p>The RUAH Centre was given its approval by the Planning Minister on the condition that the RUAH Centre abided by its Management Plan (attached) and requirements which specifically forbids loitering out the front of the 247-249 James Street Property. The video's presented to the City of Perth clearly shows that the RUAH management has failed in its operations to properly abide by the mandated Management Plan Guidelines, loitering continues in abundance, the violence, the littering (including defaecation and urination on James St) is not being 'managed', policed, curbed by the RUAH operators. I have been kicked (twice) by a RUAH client when I exited the (address redacted) James Street property then spat on when I was not able to give the RUAH client cash money. I should be able to leave my apartment and go out onto the street (peacefully and freely) on which I live without being attacked. Prior to RUAH taking up residence across the road, I have never encountered such behaviour or attacks before in my 17 years of living there.</p> <p>Secondly, I bought my property in Northbridge to be a part of the Northbridge entertainment vibe and to support events like FringeWorld, Australia Day celebrations, Chinese New Year celebrations, Drone Displays, Other Cultural events (Greek Festival), PRIDE Events, parades and the Christmas Lights - all of which my ratepaying funds proudly support / sponsor. My understanding is that it is not the City of Perth's (financial or physical) responsibility for the welfare of Perth's 'at risk' community - this is very clearly a function of the State and Federal Governments for which our taxes and mining royalties fund.</p> <p>Furthermore, the Boorloo Bidee Mia facility is a purpose build 100 bed homeless facility that continues to be under-utilised and is far better positioned (near to Royal Perth Hospital, which also has upgraded its wards to assist in giving safe haven to persons with mental health issues).</p> <p>In addition, the RUAH Centre has nearly completed its 7 storey facility on John / Shenton Street which is a purpose built facility that is specifically designed to provide safe haven for women and children at risk. I understood this was originally to be completed in 2023 however, I see that it is very close to completion therefore making the requirement / request for RUAH's extension to its operation hours redundant.</p> <p>The City of Perth needs to be clear about what was being asked to be observed by our Town Planners, and as the locality has previously had locality research town planning studies done regarding the P1 precinct and surrounds. These Town Planning approvals have been the basis of the Northbridge Study Report recommendations / vision (refer: Northbridge study 1991 - which formed the basis of the vision for Northbridge today - an entertainment precinct with mixed living). The RUAH centre operations</p>
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	<p>at 247-249 James Street under their current management guidelines have been clearly demonstrated as being unpoliceable, not able to be made wholly conditional or enforceable management guidelines - as we have sadly discovered. (Again the RUAH Operations Report should be assessed by the City officers to understand the extent of the RUAH recorded incidents - including broken window/ door).</p> <p>I also emphasise that the original Town Planning vision was for the entertainment precinct of which the residents agreed to accepting a later noise curfew time which I think has been forgotten about. The City of Perth's intention was to have our area along James street and the local area which has a high density domestic living. At no time did we agree to change this locations use to Community use however what they Government is trying to impose now is to have the locality deemed as Community Use and Entertainment Precinct of which the both uses are not neither compatible or workable side by side due to the anti-social behaviour of displaced / homeless people coupled with RUAH's history of not being able to operate under the government prescribed guidelines for anti-social behaviour / security as well as the high level of loitering / littering incidences which we have witnessed including imposed anti-social attacks on locals who are trying to enjoy the amenities and cafe ambience which the Entertainment Precinct attempts to promote. However, what we have found is that Zonts customers are being harassed, their food being stolen from their plates, locals having their push bikes stolen, BWNA operations and patrons being harassed, confronted, verbally and physically abused, sworn and shouted out. regular events of RUAH attendee's urinating and defecating at the BWNA premises.</p> <p>The City of Perth sold to the Locals of the P1 Precinct that we would be afforded the benefit of a vibrant and festival / entertainment based precinct of which we would also asked to approved greater noise curfew restrictions being lifted to accommodate Fringe World Festival and the other various cultural festivals held at Russell Square and surrounds. This is the platform on which we should remain firm as we (the local ratepayers) have already been asked to accommodate - which we happily have however, the lack of controls being operated and enforced at the Ruah Centre currently operating at 247-249 James Street is highly evidenced as to the management plan not being enforceable, policeable or tolerable to the local businesses. Had I known that the Change of Use for this location would be approved I can assure I would never have bought in the P1 Precinct location.</p> <p>I understand that the Wellington Street Boorloo Bidee Mia Centre has been reaching out for assistance in managing the facility and would appreciate the experience that the RUAH Operations could proffer their assistance. I also believe that the Ruah proposal for 247-249 James Street is in direct contradiction to the Statement of the Town Planning intent for the area west of Milligan Street incorporating James Street (west). Nowhere in this Town Planning Plan does this location have or make provision</p>
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	<p>for a short-term homeless accommodation shelter only special provision was made for Ruah on Shenton Street under special resolution which didn't extend to James Street.</p>
12	<p>We are renting an office at 228 James Street and offer a great short term holiday units 14 in total for northbridge in the building.</p> <p>We are already losing business because of the RUAH across the street.</p> <p>We are getting loads of complaints from people overseas and interstate about anti-social behaviour.</p>
13	<p>I am writing to you at the COP to lodge my objection to the proposed changes at 247-249 James Street in Northbridge. I bought an investment property across the road at (address redacted) James Street which caters for short stay accommodation primarily for visitors to the city of Perth. The location, at the time of the property purchase, was a quieter part of Northbridge with al-fresco dining and coffee shops in the area that factored into the investment decision taken then. The location, P1 precinct in Northbridge, is meant to cater for entertainment, tourism & al-fresco dining celebrating the arts. Unfortunately, since the RUAH drop-in centre opened at 247-249 James Street, the location now experiences unruly and threatening behaviour which unfortunately impacts future business for leasing short stay accommodation. Some visitors/clients have already raised complaints and I note that there have been sporadic incidents at our building already as a result of the RUAH drop-in centre.</p> <p>With the latest new proposal for an overnight shelter at 247-249 James Street, the location will most likely evolve into a full-time homeless precinct going forward. This will have an adverse impact on future business as well as property valuations. I fully understand the need to address the chronic homeless situation but believe other more suitable locations, such as Wellington Street, should be used instead. Placing a shelter in an entertainment precinct does not make sense.</p> <p>I therefore urge the City of Perth to reconsider their decision and look at more suitable alternatives.</p>
14	<p>As one of business owner in Northbridge, we are strongly objecting to the use of 247 James Street for safe house. Since RUAH moved to James Street, we have seen more anti-social behaviour from RUAH clients. We have to be more vigilant when they come to the store as there's more stealing. We have also experienced more abusive behaviour towards us and staffs.</p> <p>Surely, they can be placed somewhere else. Where it's not going to disrupt businesses. Northbridge is an entertainment precinct, people bring their families and small children to Northbridge. Please safe our businesses or all businesses in Northbridge by encouraging families to come to us, not the other way.</p>

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15	<p>I recently purchased a property in September at (address redacted) James Street. After settlement, I noticed that the RUAH centre across the road experiences threatening and unruly behaviours towards people in the vicinity, making it quite intimidating and not a nice experience to live in this part of Northbridge between the morning and afternoon. When we purchased our property, my understanding is that our property is in the P1 district of Northbridge which is meant to cater to tourism, dining and entertainment.</p> <p>With the proposed changes for an overnight shelter at 247-249 James street, this area will most likely turn into a 24 hour full time homeless precinct in Northbridge, making it an unpleasant place to live as well as bringing property values down.</p> <p>I understand the need to address the homeless situation and supply shelters in Perth, however the decision to house these people in Northbridge does not make sense as this is the biggest entertainment and nightlife district in Perth, I am sure there are better locations which would help to facilitate these people.</p> <p>I would also like to highlight the recent closure of the shelter at the Rod Evans centre in east Perth where the City of Perth closed it down due to complaints from surrounding residents. I do not think it is fair that this shelter is now moved across the road from our property in Northbridge.</p>
16	<p>I am writing to you at the COP to lodge my objection to the proposed changes at 247-249 James Street in Northbridge. I bought an investment property across the road at (address redacted) James Street which caters for short stay accommodation primarily for visitors to the city of Perth. The location, at the time of the property purchase, was a quieter part of Northbridge with al-fresco dining and coffee shops in the area that factored into the investment decision taken then. The location, P1 precinct in Northbridge, is meant to cater for entertainment, tourism & al-fresco dining celebrating the arts. Unfortunately, since the RUAH drop-in centre opened at 247-249 James Street, the location now experiences unruly and threatening behaviour which unfortunately impacts future business for leasing short stay accommodation. Some visitors/clients have already raised complaints and I note that there have been sporadic incidents at our building already as a result of the RUAH drop-in centre.</p> <p>With the latest new proposal for an overnight shelter at 247-249 James Street, the location will most likely evolve into a full-time homeless precinct going forward. This will have an adverse impact on future business as well as property valuations. I fully understand the need to address the chronic homeless situation but believe other more suitable locations, such as Wellington Street, should be used instead. Placing a shelter in an entertainment precinct does not make sense.</p>
17	<p>I am the owner of (address redacted) James Street in Northbridge and I have just been made aware that the Ruah facility, which I originally objected to and now located at 247 James Street, is seeking to extend their operation to include a Safe Night space,</p>

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	<p>which will see the center opening for virtually 3 times the hours more than that which they had initially proposed and ultimately were approved for.</p> <p>I find this most concerning as the consequences of the City and or State Government in approving this application, will only see an increase in the level of anti-social behavior, loitering and rough sleeping, all of which have become apparent since the Ruah facility opened. We had no issues of this sort before Ruah got their approval and business up and running and it gets worse by the day. The bases for my initial objection have now been proven correct. These days it is not uncommon to find groups and individuals, whom are clearly Ruah clients, loitering, laying and sleeping at the front of my property and numerous other immediate properties (albeit I have no doubt that filter all across Northbridge as the day progresses) . There is always rubbish and private belongings scattered across the front of properties, whilst they take refuge and await for the facility to open . Even after the facility closes they are still loitering around with some now deciding that it is a good place to set up camp.</p> <p>Accordingly , I strongly urge the council to outright refuse the application and contest any attempt by the Planning Minister to overrule them, as was the case last time</p>
18	<p>There is little to be gained in regurgitating all the concerns that local residents and businesses had with the original proposal, except to say their concerns have been realised. Sadly, small business operators have either had to close or made the choice not to renew their Leases. A much loved local precinct that has grown organically has been severely affected by bureaucratic indifference to the local community.</p> <p>It is insane to think the proposed expansion of the existing facility and its operations will in anyway improve the amenity of that section of James Street.</p> <p>For the same reasons the Council unanimously rejected the earlier application in 2022, so it should for this application.</p>
19	<p>I'm shocked that RUAH were placed into Northbridge, a place where we get visitors from all around the world. It gives Perth a very poor image and doesn't do this beautiful State any justice.</p> <p>As an owner of a property in James Street I have seen vandalism, crime and damage to private property.</p> <p>I fear for people visiting this area, people staying at the Best Western and other hotel and short stay chains in Northbridge.</p> <p>I'm all for helping the disadvantaged, but I object to having RUAH in James Street, Northbridge has a poor history and I would be thinking COP would look at fixing it.</p>

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20	<p>I am writing to you at the COP to lodge my objection to the proposed changes at 247-249 James Street in Northbridge. I bought an investment property across the road at (address redacted) James Street apartment, which caters for short stay accommodation primarily for visitors to the city of Perth. The location, at the time of the property purchase, was a quieter part of Northbridge with al-fresco dining and coffee shops in the area that factored into the investment decision taken then. The location, P1 precinct in Northbridge, is meant to cater for entertainment, tourism & al-fresco dining celebrating the arts. Unfortunately, since the RUAH drop-in centre opened at 247-249 James Street, the location now experiences unruly and threatening behaviour which unfortunately impacts future business for leasing short stay accommodation. Some visitors/clients have already raised complaints and I note that there have been sporadic incidents at our building already as a result of the RUAH drop-in centre.</p> <p>With the latest new proposal for an overnight shelter at 247-249 James Street, the location will most likely evolve into a full-time homeless precinct going forward. This will have an adverse impact on future business as well as property valuations. This investment is now already being impacted and has caused our family to lose money due to the current situation and even more if the proposed changes are passed.</p> <p>I fully understand the need to address the chronic homeless situation but believe other more suitable locations, such as Wellington Street, should be used instead. Placing a shelter in an entertainment precinct does not make sense.</p> <p>I therefore urge the City of Perth to reconsider their decision and look at more suitable alternatives.</p>
21	<p>I vote against this application.</p> <p>I live opposite, facing this building and have seen a rise in homelessness sleeping in front of buildings next door with a lot of anti-social behaviour.</p> <p>I fear for my safety everytime I enter/exit my apartment.</p> <p>I urge the council to consider a more appropriate location.</p>
22	<p>I object to the Application for Additional use of the RUAH occupied building, 247-249 James Street, Northbridge.</p> <p>Please understand I do have a great deal of compassion for people who find themselves homeless, subject to Domestic Violence and / or low income. Making an objection is not at all simple for me - Northbridge is not the solution.</p> <p>I do hope that all levels of Government and Service Providers can work together for a solution that considers all parties.</p>

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	<p>As an owner/occupier for over 20 years, I have witnessed the slow but sure neglect of James Street and surrounds.</p> <p>I strongly object to constantly witnessing the disregard for other people, the verbal encounters and abuse, the begging for money, cigarettes and the aggravation that can already occur in the area. Certainly, this can occur in parts of town however my concern at the moment is Northbridge.</p> <p>The sorts of things I am describing do not leave a good impression of a section of the city that relies on residents, visitors, Tourism, Entertainment, Restaurants and Café business for the local economy.</p> <p>I have previously objected to the changes of use for that building. It is extremely difficult to determine what changes will be asked for next.</p> <p>I believe Ruah has access to another suitable premises such as Tranby Hub that can be used for the same purpose.</p> <p>The reasons for my latest objection are:</p> <ul style="list-style-type: none">• Northbridge already has a bad reputation and is considered unsafe. It is not a place for women in distress looking for assistance.• 247- 249 James Street is in a “quieter” part of Northbridge however 247 James is in a mixed used part of the street. The mixed use includes:<ul style="list-style-type: none">- small businesses,- a Hotel (Tourist) complex and- Residential apartments complex directly opposite the building• The impact of RUAHs operations is not just on James Street itself but the surrounding residential apartments / small businesses bounded by Fitzgerald and John Streets and Shenton St, and Russel Square.• The continued expansion of services offered by RUAH also further impacts the mental wellbeing of the people living and working in the area. Subconsciously there is a tendency to develop a nervous feeling of distrust of the street people who roam the area. At 247- 249 James it becomes a situation of the RUAH clients feeling they are being watched and vice versa for the Residents / Tenants / Visitors of the area.• The entrances to Business and Residential buildings are often being used by people to sleep in and urinate is a constant problem for some of the Apartment foyers
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	<ul style="list-style-type: none"> • There are people sleeping in Russel Square and in Cars. Quite often the people in the park are passed out. Yes, I have checked on some of them to see if they are ok. • Along James St there are “homeless” sitting in front of shops or sprawled over the footpath without any thought to the shop owners trying to make a living or the passers by going about their business. • The state of James Street on various occasions is a very scary thing for young children and visitors. I have watched the children’s look of fear or distress when they are walking down the street with their parents. It is heart breaking. • The lighting in James Street is not adequate and quite often the streetlights are diminished or not working. This becomes a safety issue. • I have witnessed the Police telling a man, who was loudly yelling profanity to settle down and stop yelling. His loud response was basically “you can’t f@#\$ tell me to stop yelling. This is only one example of people roaming the street telling the Police what they can and cannot do. • People are already sleeping on the bench or within the area of the swings. This precludes the use, by young families, of what is currently a very popular swing park.
23	<p>I am writing to notify you of my objection to the COP proposal to increase the hours of use at the Ruah drop in centre. I have an investment property within the (address redacted) James street and also operate a business in the area, this building being short stay caters mainly for tourists and holiday makers to the city. Being on the fringe of Northbridge entertainment precinct with its little coffee shops and beautiful townhouses is a gem of the area, but this is on a steady decline since the introduction of the current Ruah centre. The intimidating, noisy and anti social behaviour is witnessed daily and is very off putting for tourists, guests and residents alike. My fear is that by increasing the Ruah hours to a night shelter will only bring more and more anti social and unruly behaviour to the area and continue all night, which is detrimental to the overall vibe of this precinct and the sustainability of short stay businesses.</p> <p>The Best Western Complex along with many other in the area have already suffered considerable impact from the current Ruah centre and it is unreasonable to continue increasing the strain on these businesses and surrounding residents.</p> <p>Whilst I am sympathetic to the people that will attend this centre I am also of the view that there should be many other more suitable locations to help both the Northbridge area and the vulnerable people that need the help. It seemingly makes very little sense at all to be placing a shelter for disadvantaged people of any form in an entertainment precinct.</p> <p>I strongly urge the City to please reconsider the location of this facility and look for more suitable locations.</p>

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24	<p>I have been a business owner, property owner and resident of Northbridge since March 2004. At the time, we took a gamble and believed in the future of WA. Not only did we believe but invested everything we owned into this part of the city. Yes, we had heard all the negativity, but we believed in the vision for this part of this city. The bright future that Northbridge promised was what we believed in and, not long after our arrival in Northbridge, our family started to grow.</p> <p>As the years went by, we became big advocates for Northbridge and lived it's many transformations. We were extremely pleased' with the government's vision at the time and the plans that were in store for Northbridge. These plans for Northbridge did include higher density living. I saw how like us, many people also bought into the vision for inner city living, higher density living in the city and inner-city areas.</p> <p>We continued to align our family's future with the future of Northbridge. Why wouldn't we? This was going to be to area to live in. As such, we heavily invested in real estate in Northbridge.</p> <p>Tourism and hospitality are industries that we invested our time and money into, and I have to say that, for many years, it supported our family well. Fast forward to March 2023, this is the commencement I believe of the decay to this area of Northbridge. RUAH has been the single most disruptive addition this area has ever seen. We originally opposed RUAH establishing a drop-in centre at their current 247 James St location. My objection was mainly about wanting to keep anti-social behavior away from this precinct and it came from 'lived experience.' Our objections and reasons for objections have been vindicated.</p> <p>We witness anti-social, disruptive behavior daily. The amount of people that RUAH attracts to its 247 James Street location is growing and growing. A week rarely goes by without the usual; get f\$&*ked, f\$&*k off, go away or I will kill you, it's not your pavement etc. The police are constantly in 247 James St. RUAH clientele includes homeless peoples and a large percentage have issues with drugs, alcohol, violence and mental health issues. Now I ask, how could this type of behavior and witnessing this every day be supporting tourism and hospitality? It's embarrassing! We do our best to calm the fears and concerns of the café and hotel guests.</p> <p>RUAH currently operates from 0830hrs to 1400hrs. Even with those hours, there are people constantly loitering around this area. Before RUAH bullied their way into this location, we never experience the constant:</p> <ul style="list-style-type: none">• Loud swearing on the street• Constant screaming and fighting• Physical fights between RUAH clients
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	<ul style="list-style-type: none">• Verbal and physical abuse of their security guards• Increased crime activity on this end of James St• Had to clean human waste around my premises.• The contact rubbish.• Threats received when asking RUAH clients to leave my place of business• Constant physical threats• Contact abuse• Inconsiderate clients of RUAH with their constant carrying on and amplified music where businesses and just trying to trade• Ferocious looking dogs often with no lead, being left to roamer this part of James street as the owners are RUAH clients. <p>Many businesses in this area suffered during COVID. My hotel business did suffer greatly during COVID. At the commencement of 2023, we were primed to move forward with my hotel business. RUAH has killed any chance of recovery!.</p> <p>I really feel that the state member for Perth has no empathy nor has any idea of what is required to run a business. I write this as this is the only logical explanation that would see him place these vulnerable people next to all the things that they have problems with: drugs, alcohol, petrol station, hardware store, entertainment venues etc. I would have thought the prudent thing is to keep people away from things they have a problem with and not just place them amongst it all.</p> <p>The last couple of months or so have been a realization period of whether it is worth continuing to fight. I am passionate about my business and Northbridge. I now must accept that regular anti-social behavior is the new norm. This bad situation will get even worse as RUAH wants to operate accommodation between 1900hrs - 0700hrs. This part of James St will effectively become a 24-hour homeless precinct. Have we not learned anything!?. Do we continue to sacrifice productive businesses cause their existence is not as important as the needs of the homeless? We have fought long and hard for this area to be kept clean of anti-social behavior. We fought hard when the system let us down by the undemocratic decision on the State Labor Government.</p> <p>RUAH has killed my business! As I write this, I cannot guarantee that my business will survive the first year of RUAH across the road. One guarantee I can make is that my business will NOT be here if RUAH establishes and operates overnight accommodation. Haven't we learned the lessons of the Safe Night Space in East Perth? Why is it now acceptable to move the daytime time anti-social behavioral problems (that were evident during the day at the Rod Evans Centre) to this part of James St? Why is it that the Member for Perth thinks it's acceptable to keep dumping on Northbridge?</p>
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	<p>It is a well-worn saying that to do the same thing and expect different results is the definition of madness. The issues mentioned are not new and it appears that we are just relocating the same problems as the article in the link describes.</p> <p>I am a father our three dependent children. This hotel business is 'the family business!' Whether I continue or not with this business is no longer just a commercial consideration. It is now also an occupational health and safety consideration. We all know what happens when passionate managers intervene in issues that are happening on the street near their place of business-think of the late Giuseppe Raco who was killed during his shift as the manager of the Paramount Nightclub. I fear that there is a real danger to me personally in continuing this operation with the level of anti-social behavior now at my front door.</p> <p>The RUAH situation does not only affect my business, but my staff and local businesses. We are all affected by this. On and off, I have approximately 10 staff members. I am finding that there are now less hours for my staff and my front office staff are constantly having to keep RUAH clientele away as they are not here to conduct lawful business with us. The employment of my staff, particularly my front office staff, has become increasingly dangerous as they find themselves having to deal with RUAH clients causing a nuisance and quite often intoxicated or coming down from a number of substances.</p> <p>The downturn in business for me also affects some of the local businesses. The more people we accommodate, the more that they will support the local community. All that RUAH is assisting to do is to decrease visitation to this area affecting all rate and tax paying businesses in this area.</p> <p>On behalf of my family and I, and as a Northbridge Stake holder, please find another place for the women's shelter. The Tranby House precinct in East Perth has become quite a dangerous area and somewhat of a 'no go' zone. Please do not turn what used be affectionately known as the "Paris end of James St", into to a dirty and dangerous area. This area will be tarnished for years with this negative legacy hard to shake off. The way it's heading WAS NOT the COP's vision for James St! Please do not forget the large number of residents that live around this area who will now find this these issue at their front doors.</p>
25	<p>I strongly object to the current development application which seeks to include additional use of a safe night space for women.</p> <p>I am currently already having to deal with the anti-social behaviour caused by the current RUAH facility. This includes aggressive behaviours, swearing, threats of physical violence and unpredictable behaviour.</p> <p>If this new development proceeds, it will add to the issues that are listed above which I am very concerned about.</p> <p>Northbridge will go from a place that currently has booming cafes, safe residence and tourism to a homeless dumping site which is unsafe to go anywhere near.</p>

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26	<p>RUAH has not adhered particularly well to its existing management plan. Any expansion of the services it offers is all but certain to have a greater adverse impact on the direct surrounds.</p> <p>Northbridge is the licensed liquor capital of Perth. Can it reasonably be considered to be the safest place for a safe night centre?</p> <p>Town Planning decisions are often the thin edge of the wedge. Once approved, precedents are set. Do we want the West end of James Street to mirror what has occurred in the East end of Aberdeen Street?</p>
27	<p>I strongly object to current development application seeks to include an additional use of a safe night space for women, operating from the site between 7:00pm and 7:00am seven (7) days a week.</p> <p>The anti-social behaviour that is already being experienced from RUAH operating between 8:30am to 2:00pm Monday to Friday is unacceptable and severely impacting the surrounding residence.</p> <p>The opening of this development will only add to the issues. There will be loud sounds all night, violent men trying to follow these women, drug related issues & poor management. These women will be out loitering on the streets out the front of RUAH causing disturbance to neighbours and noise issues.</p> <p>They will be out the front of the RUAH building to smoke & speaking on their phones at unreasonable hours of the night.</p> <p>The management of RUAH is already extremely poor, from 7am there are people out the front sitting all over the street, swearing, off their faces on drugs with security having no control over them. Even during operating hours, the security have proven to have no control.</p> <p>We purchased 2 properties in this area which we certainly wouldn't have if we knew that the city was intending to change the use of the location from entertainment precinct to a homeless precinct.</p> <p>There are plenty of vacant buildings in a better suited location then across from a residential area.</p> <p>Again, I strongly object and believe that the rates payers in the area should be considered.</p>
28	<p>We are the owners of property in James and Lake Street and we wish to express our concern for the extension of services proposed by Ruah. We originally objected to the initial proposal of the Ruah Centre and sent you our objections together with many business owners and residents of the area.</p> <p>It is with great concern and trepidation that the Ruah centre will be allowed to extend its hours to virtually a 24 hour centre. The current situation at Ruah has been tolerated by business owners because of the limited hours of operation. If the proposal</p>

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	<p>goes ahead, however, it changes the whole situation and will only aggravate the volatile environment in Northbridge which has been a concern to the public for many years. Northbridge is not a suitable or safe area for women escaping DV. A quieter area away from the possible mayhem and the occasional volatile environment of Northbridge would be a better choice. Northbridge is the wrong location!!</p> <p>We are aware and appreciate that the City of Perth has invested heavily in improving and attracting new business to the area. Equally, we have seen evidence that the private sector, including ourselves, has also taken up the initiative of investing heavily in new enterprises and improvements to existing properties. Let's return Northbridge to its former glory days of being a safe and enjoyable entertainment hub for all families.</p> <p>We believe that the City of Perth as well as the state government are doing their best to resolve the current situation. We urge you all to not provide a band aid situation to appease the public but to find a permanent solution elsewhere which will be agreeable and acceptable to all parties concerned. Northbridge is not the answer for the women escaping violence nor for business or families.</p>
29	<p>I hope this letter finds you well. I am writing to express my concerns and objections regarding the proposed homeless shelter across from my business (address redacted) James Street, Northbridge. While I fully understand the importance of providing support and assistance to those in need, I believe that the chosen location for the shelter will have a negative impact on my business and the surrounding community.</p> <p>James Street used to be a lively street back then when I was a kid. However, things changed and the street has been seemingly quiet. My goal is to bring back the liveliness I've experienced back in the 90's and 2000's by uniting our community within the street. This has been quite evident in our offerings as a (business redacted) that's been making a name of itself on social media platform and has since garnered attention back to James Street with plenty of people walking down James Street.</p> <p>My objections towards having the 24/7 Additional Use of Safe Night Space for Women within existing Community Centre are based on the following grounds:</p> <p>1.Impact on Foot Traffic and Customer Perception: The presence of a homeless shelter in close proximity to my (business redacted) is likely to deter potential customers (it already has by having RUAH opposite us and their clients pulling death (be it empty or not) threats on our patrons & staff members working (we've got video as evidence and this has been reported to RUAH itself). Many people may feel uncomfortable or unsafe, leading to a decline in foot traffic. This, in turn, could adversely affect my business and its reputation within the community that we've so desperately trying to rebuild the area.</p>

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	<p>2. Safety Concerns: Unfortunately, the proximity of a homeless shelter may raise safety concerns for both customers and employees. Addressing these concerns is crucial to maintaining a secure and welcoming environment for everyone. We've all seen the plans released by RUAH however we've not seen it being incorporated 100% to it and it's been a concern ever since the establishment of this homeless shelter right across us (Best Western building).</p> <p>3. Potential for Loitering and Disorderly Behavior: Homeless shelters may attract individuals engaging in loitering or disorderly behavior, which could further contribute to an unwelcoming atmosphere for customers and residents alike.</p> <p>4. Property Value: The presence of a homeless shelter can potentially have a negative impact on property values in the area, affecting not only my business but also the investments of other local property owners.</p> <p>I acknowledge the importance of addressing homelessness in our community and support initiatives that provide assistance and resources to those in need. However, I urge the City of Perth Council to consider alternative locations that are less likely to disrupt local businesses and compromise the safety and well-being of the community.</p> <p>I kindly request the council to reconsider the proposed location and engage in further dialogue with local business owners to find a solution that is mutually beneficial for both the homeless population and the business community.</p>
30	<p>I am the owner of a property opposite Ruah. I do empathise hugely with the plight of homeless people. I do believe help for them is needed.</p> <p>However, I think it is important that help be weighed against the interest of other members of society too. Being an owner and living in my property across from Ruah, I am witnessing shouting, screaming and more from across the street even during early hours of the morning. I am also the victim of a break in at my place. It was brutal. We could have lost our lives. And, since then, there have been so many other break ins in our estate. It was done with justification that they are forced into such a position to have to do it. I am sorry I don't know if that is right thinking. I wish when help is dished out, those who received it would make use of them with appreciation and consideration and thankfulness. Maybe education is needed here.</p> <p>So, whilst I empathise hugely with these people and help is needed for them, I think it must not be given at a location where and at expense of others who are compliant members of the community and paid a lot for their properties to have a home or a business. Surely, they deserve to be looked after too. Therefore, I sincerely urge that Ruah be encouraged to look elsewhere which may be more appropriate especially given that Ruah has funding which I understand is not small. Taxpayers are helping in</p>

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	<p>this way they deserve to live in safety and peace from all these social difficulties where there are alternatives. As taxpayers, they are already doing their share to help the vulnerables.</p> <p>With the police vehicles now parked outside Ruah every day, it speaks volume that trouble is anticipated to blow up anytime. I dare not even walk along the road outside where I live in case of being caught at the wrong place at the wrong time so close to my own home. After our break in, we have to lock all the windows and shutters and enclose ourselves in a space to feel more safe. Every noise we hear especially in the middle of the night from outside, we now would wake up to check. It has brought about so much anxiety. It is not right to have to live in fear. It is a horrible situation to be in. Please consider our welfare too and our contributions to the community.</p> <p>Kindly weigh out the interests of all parties fairly.</p>
31	<p>I am writing to you at the COP to lodge my objection to the proposed changes at 247-249 James Street in Northbridge. I bought an investment property across the road at (address redacted) James Street which caters for short stay accommodation primarily for visitors to the city of Perth. The location, at the time of the property purchase, was a quieter part of Northbridge with al-fresco dining and coffee shops in the area that factored into the investment decision taken then. The location, P1 precinct in Northbridge, is meant to cater for entertainment, tourism & al-fresco dining celebrating the arts. Unfortunately, since the RUAH drop-in centre opened at 247-249 James Street, the location now experiences unruly and threatening behaviour which unfortunately impacts future business for leasing short stay accommodation. Some visitors/clients have already raised complaints and I note that there have been sporadic incidents at our building already as a result of the RUAH drop-in centre.</p> <p>With the latest new proposal for an overnight shelter at 247-249 James Street, the location will most likely evolve into a full-time homeless precinct going forward. This will have an adverse impact on future business as well as property valuations. I fully understand the need to address the chronic homeless situation but believe other more suitable locations, such as Wellington Street or the commercial area of East Perth, should be used instead. Placing a shelter in an entertainment precinct does not make sense.</p> <p>I therefore urge the City of Perth to reconsider their decision and look at more suitable alternatives.</p>
32	<p>After Ruah came into operations @ James Street, we have complaints and Reports from our Northbridge Managers, of people :</p> <ul style="list-style-type: none"> - Loitering and Loud swearing on the street; -Constant screaming and fighting;

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	<p>-Physical fights between RUAH clients; -Verbal and physical abuse of security guards; -Increased crime activity at this end of James Street -Having to clean human waste around Northbridge premises; -Facing constant threats; -RUAH clients with loud amplified music for trading purposes.etc.</p> <p>Therefore, establishing what tantamount to a homeless precinct at James Street, would give the area a bad reputation severely impacting on the long term legacy of this area of NorthBridge. RAUH already presents a clear and present danger- commercially and physically.</p> <p>We therefore ask the relevant Authority to look at this seriously and STOP it, so as not to kill this part of peaceful and safe Northbridge, St. James Street.</p>
<p>33 (Received after consultation period)</p>	<p>St Patrick's Community Support Centre (St Pat's), a homelessness support service and community housing provider operating across the metropolitan area including the Perth CBD, I write to express my support of Ruah Community Service's proposal to operate the Safe Night Space service out of the Ruah Engagement Hub located on James Street, Northbridge, until a more permanent location can be secured.</p> <p>St Pat's has worked with Ruah over many years to provide support to people facing complex challenges and chronic homelessness. Their team's exemplary professionalism and significant expertise, particularly when it comes to supporting women and children experiencing family and domestic violence, is evident in the positive outcomes they've achieved for so many people in our community.</p> <p>I believe that ensuring a safe space for those in need is not just a matter of compassion but also a crucial step in fostering a stronger and more caring community. The services provided by Ruah are intended to connect these women with longer term solutions, which will benefit everyone who lives and works in the City of Perth.</p> <p>Given the success and favourable outcomes of the two-year pilot program run by Ruah Community Services with the support of the City of Perth, I am confident in Ruah's operation of the Safe Night Space, their ongoing management in addressing any community concerns that may arise, and the security of the facility.</p>

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	<p>Thank you for your consideration of this matter. I trust that you will carefully review this letter, and I strongly urge you to support Ruah Community Service in their endeavour to keep women safe at a time of their greatest need.</p>
34 (Received after consultation period)	<p>As a Homelessness Sector colleague I write to express my support of Ruah Community Service's proposal to operate the Safe Night Space service out of the Ruah Engagement Hub located on James Street, Northbridge, until a more permanent location can be secured.</p> <p>I believe that ensuring a safe space for those in need is not just a matter of compassion but also a crucial step in fostering a stronger and more caring community. The services provided by Ruah are intended to connect these women with longer term solution</p> <p>Given the success and favourable outcomes of the two-year pilot program run by Ruah Community Services with the support of the City of Perth, I believe it is within the community's best interest to continue to provide this successful service.</p> <p>Ruah has a commendable track record of providing effective and compassionate assistance through the Ruah Engagement Hub and the Safe Night Space. I am confident that their operation of the Safe Night Space will have a positive impact on the lives of many.</p> <p>Thank you for your consideration of this matter. I trust that you will carefully review this letter, and I strongly urge you to support Ruah Community Service in their endeavour to keep women safe at a time of their greatest need.</p>
35 (Received after consultation period)	<p>As a City of Perth business and an organisation that supports Ruah's mission and purpose, I write to express my support of Ruah Community Service's proposal to operate the Safe Night Space service out of the Ruah Engagement Hub located on James Street, Northbridge, until a more permanent location can be secured.</p> <p>I believe that this initiative aligns with the City's responsibility to offer safe, supportive services and places for people in need. In this case, this is vulnerable women who are homeless (many experiencing domestic violence) needing safety during crisis.</p> <p>Given the success and favourable outcomes of the two-year pilot program run by Ruah Community Services with the support of the City of Perth, I believe it is within the community's best interest to continue to provide this successful service.</p> <p>Ruah has a commendable track record of providing effective and compassionate assistance through the Ruah Engagement Hub and the Safe Night Space. I am confident that their operation of the Safe Night Space will have a positive impact on the lives of many.</p>

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	<p>Thank you for your consideration of this matter. I trust that you will carefully review this letter, and I strongly urge you to support Ruah Community Service in their endeavour to keep women safe at a time of their greatest need.</p>
36 (Received after consultation period)	<p>As a resident, I write to express my support of Ruah Community Service's proposal to operate the Safe Night Space service out of the Ruah Engagement Hub located on James Street, Northbridge, until a more permanent location can be secured.</p> <p>Given the success and favourable outcomes of the two-year pilot program run by Ruah Community Services with the support of the City of Perth, I believe it is within the community's best interest to continue to provide this successful service.</p> <p>I believe that supporting an initiative that has proven successful under current management, such as the Safe Night Space run by Ruah, positions the City of Perth as an innovative thought leader and results in lower risk due to two and a half years of experience.</p> <p>Thank you for your consideration of this matter. I trust that you will carefully review this letter, and I strongly urge you to support Ruah Community Service in their endeavour to keep women safe at a time of their greatest need.</p>
37 (Received after consultation period)	<p>I am writing on behalf of the team at Homeless Healthcare to express our support for Ruah Community Service's proposal to operate the Safe Night Space service from the Ruah Engagement Hub on James Street, Northbridge, until a more permanent location can be secured.</p> <p>Ensuring the availability of a safe space for women within the city is of paramount importance. It provides a crucial haven for those experiencing homelessness and violence. Without such a facility, this vulnerable cohort of women faces an increased risk of violence, potentially leading to costly Emergency Department presentations and hospital admissions.</p> <p>Drawing from the success and positive outcomes of Ruah Community Services' two-year pilot program, conducted with the valuable support of the City of Perth, we firmly believe that it is in the best interest of the community to continue offering this vital service. Crisis accommodations, such as the Safe Night Space, are integral to supporting individuals experiencing homelessness, and many city centres internationally recognise the importance of such services.</p> <p>We sincerely appreciate your consideration of this matter. We trust that this letter will receive your careful review, and we strongly urge you to lend your support to Ruah Community Service in their endeavor to provide a safe haven for women during their most vulnerable moments.</p>

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38 (Received after consultation period)	<p>As a neighbouring business to the Ruah Engagement Hub I write to express my support of Ruah Community Service's proposal to operate the Safe Night Space service out of the Ruah Engagement Hub located on James Street, Northbridge, until a more permanent location can be secured.</p> <p>I believe that this initiative aligns with the City's responsibility to offer safe, supportive services and places for people in need. In this case, this is vulnerable women who are homeless (many experiencing domestic violence) needing safety during crisis</p> <p>Given the success and favourable outcomes of the two-year pilot program run by Ruah Community Services with the support of the City of Perth, I believe it is within the community's best interest to continue to provide this successful service.</p> <p>I believe that supporting initiatives such as the Safe Night Space is essential for creating a city that cares for all its residents, regardless of their circumstances or whether they have the good fortune to pay rates.</p> <p>Thank you for your consideration of this matter. I trust that you will carefully review this letter, and I strongly urge you to support Ruah Community Service in their endeavour to keep women safe at a time of their greatest need.</p>
39 (Received after consultation period)	<p>Ruah is an excellent organisation with a proven track record in service delivery to the most vulnerable people in the community. They are best placed to continue to operate this service for women and children, with the resources and trust already established. This service is vital to support those in crisis and allow them easy access to other support services in the City of Perth area. This service is a vital tool in breaking the cycle of violence and homelessness within our community.</p>
40 (Received after consultation period)	<p>The Safe Night Space is a life-saving service for women, many of whom are fleeing family and domestic violence. We are experiencing a cost of living and housing crisis that is going to see more and more people become displaced. It is the role of government at all levels to step in and support people who are struggling - especially those who are vulnerable. If the CoP is serious about community safety and combating gendered violence, they will support RUAH's application and ensure the Safe Night Space can continue to operate for as long as it is needed.</p>
41 (Received after consultation period)	<p>Having been involved in the family and criminal law spaces for some time, and seen and supported the great work being done by the likes of Bron at Mettle Women etc, there is clearly a desperate need for more safe night spaces on Perth, in fact even more than the amazing facility Ruah offered previously.</p> <p>Please can common sense prevail and can you help Ruah get this facility back up and running</p>

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42 (Received after consultation period)	A solution is desperately needed to provide a safe nights space for women. I fully support the use of Ruah's location at 247 James St, Northbridge as a suitable location to provide this vital service.
43 (Received after consultation period)	<p>Street Law provides legal services to those experiencing homelessness. Fortnightly Street Law attends the Ruah Engagement Hub to provide those services. Through the delivery of our legal services, we meet with women who are escaping family and domestic violence and who have been victims of crime while experiencing homelessness.</p> <p>The Ruah Engagement Hub is a space that is dedicated to the needs of those experiencing homelessness. The staff are well trained and dedicated to support those experiencing homelessness. Women experiencing homelessness are some of the most vulnerable in our community, they need a safe place and access to services that can work with them to address any social, welfare, health and legal issues that resulted in them experiencing homelessness and remove the barriers to them exiting homelessness. The location and services already provided at the Ruah Engagement Hub means it is the best current location to have Safe Night Space.</p> <p>Sleeping on the streets is not safe, women need a safe space.</p>
44 (Received after consultation period)	<p>As a business owner in Perth I heartily applaud Ruah's efforts to help vulnerable people facing severe hardship.</p> <p>Ruah should be fully supported in its valiant efforts to relocate the Safe Night Space.</p> <p>As a former councillor I have no idea how a decision could be made that deliberately makes people homeless - particularly at Christmas time where many community support services wind down for a week or two and when many people seeking assistance have young families.</p> <p>Councils are here to serve the whole community, not just the rich and privileged few.</p> <p>The Safe Night Space should never have been closed. A solution to remedy this stands before the City of Perth and I sincerely hope operations from the suggested new Location are approved without delay.</p> <p>After all society (and local government) is judged by how it treats its most vulnerable people.</p> <p>To fail to help at this time would not only make elected members Look heartless but also puts</p> <p>Lives and quality of Life at risk for many people who are facing adverse Life situations through no fault of their own.</p>

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45 (Received after consultation period)	Places like these are so important and in some cases can be a matter of life or death.
46 (Received after consultation period)	It is in a well-lit location, close to a Police Station, which increases safety for the women. There is a need for this Safe Night Space and as a person working in Northbridge, I support this decision.
47 (Received after consultation period)	It is important for us as a community that we care for the most vulnerable and provide services - where they are I don't want to work in a city that has a NIMBY attitude.
48 (Received after consultation period)	As rate payers we fully support any interim safe Night space for our homeless and detitue community until more permanent arrangements can be provided
49 (Received after consultation period)	With the closure of Rod Evan's Centre the need for Emergency accommodation has NOT gone away! I believe Ruah, acquainted as it is with these issues, is well placed to (be supported) to provide services.
50 (Received after consultation period)	There are too many women in unsafe environments and removing options like Safe Space demonstrates how low a priority women's safety is to the City of Perth.
51 (Received after consultation period)	<p>It will offer the safety of having the Northbridge Police Station located a few doors away. This will allow an immediate response from police if required. The Ruah Community hub is well fitted out to accommodate vulnerable women in need of a safe space to sleep.</p> <p>Ruah Northbridge have offered a SNS service in the past to Women and children and this had proved to be successful.</p> <p>The Deen Clinic continues to partner with Ruah in providing quality healthcare to women who may not have a GP.</p> <p>It is vital that the city of Perth continues to support services, such as Ruah's SNS to keep vulnerable women safe and off the streets of Perth at night.</p>
52 (Received after consultation period)	<p>I lend my full support to the use of Ruah's James St premises to continue to deliver vital support at any time of the day or night to people experiencing homelessness.</p> <p>In particular, at this time, to use the James St premises to provide a temporary replacement for the Women's Safe Night Space, until such time as a permanent solution can be found and the use of the James St premises for this purpose is no longer required, as determined by Ruah.</p>

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53 (Received after consultation period)	I wholeheartedly support Ruah in utilising their Engagement Hub to manage the Safe Night Space until they can establish another suitable facility. Working in Northbridge, I witness firsthand the invaluable work that Ruah carries out to assist vulnerable members of our community. It is horrific that currently without this Safe Night Space, many women currently have nowhere to turn in times of need. I extend my sincere appreciation to Ruah for their tireless efforts, and I hope for the prompt resumption of the crucial services provided by the Safe Night Space.
54 (Received after consultation period)	Ruah's service location on James St is well positioned for a temporary SNS service and will be able to utilise their open spaces and discrete entrance. The location is situated a few doors from the Northbridge Police Station for rapid response to any incidents, and the location is far away enough from residents and other businesses that might be operating at night. The team at Ruah have demonstrated that they can run this service effectively.
55 (Received after consultation period)	We need more services for women and more safe places for women. The current climate with rentals and refuges full is upsetting to hear, instead of closing services we should be opening more
56 (Received after consultation period)	The safe night safe is located centrally to enable women at risk to access it easily via bus or train if they don't have a vehicle. This is a valuable service given the number of women affected by domestic as well as the number of women harmed or killed by partners. We need to look at these statistics seriously and ensure services like the Safe Safe provided by Ruah continue to support women at risk.
57 (Received after consultation period)	Ruah's commitment to running the Safe Night Space at the Ruah Engagement Hub in Northbridge resonates with me on a deeper level because of their comprehensive approach to fostering a secure environment for individuals facing challenges. Their emphasis on compassion, inclusivity, and providing essential support services not only addresses immediate needs but also contributes to the Long-term well-being of those seeking refuge. By supporting Ruah in this endeavour, I believe we can collectively make a positive impact on the Lives of vulnerable individuals, promoting a sense of dignity, belonging, and hope in our community.
58 (Received after consultation period)	As somebody who works and Lives in Perth city, I want to be proud that my city supports vulnerable women.
59 (Received after consultation period)	RUAH's work is invaluable for the community, and there are many community members who would benefit from a safe night space.

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60 (Received after consultation period)	It was sad to see the Rod Evans Centre service close. We now have people back sleeping on the street benches nearby. I also agree that the Location suggested by the City of Perth is totally unsafe for vulnerable women. Personally, I avoid that area during the day, never mind at night. Ruah is offering the only currently viable service.
61 (Received after consultation period)	I am a Street Pastor with eagle City Mission Church and over the Last four years have Lived at St Barts Womens Future homes accommodation Feb-Aug 2020 till I got my housing commission Unit so have experienced what the women are going through. Without these services they are out on the streets where they are left vulnerable to being raped bashed etc. I do not wish this on any woman as I have experienced this at different times during my Life. Every person has the right to a safe place to sleep. Yes I know these women also maybe drug affected or affected by paint thinners and alcohol but they can also be supported with these addictions as well whilst in the care of safe nights. Please take this seriously. I am willing to help in anyway I can to help make this happen
62 (Received after consultation period)	<p>I Live, work, shop and socialise in the City of Perth and have done for the past 7 years, to hear that they are not helping women who are homeless with the majority escaping a violent home is outrageous. I whole heartedly support this service opening in my neighbourhood and its a no brainer to use a place that already supports homeless people and with Ruah who already knows the people using the service.</p> <p>While maintaining the original safe night space's Location would have been logical, they opted to close itfor "community use;" a decision I find puzzling. In my view, these women are an integral part of our community, deserving priority over activities Li ke craft clubs or birthday parties.</p> <p>As someone who has travelled and Lived across the world, I find it embarrassing that our city (an extremely affluent one) seems inclined to push these women out of the city, and not providing the support they need. A more compassionate approach would involve providing assistance in a</p> <p>Location that is both accessible and secure for them.</p> <p>Do better City of Perth.</p>
63 (Received after consultation period)	Thank goodness for RUAH. What would we all do without your amazing services. RUAH is perfectly experienced, and so well geographically Located to manage this critically important service. Please consider and support this extraordinary organisation.
64 (Received after consultation period)	I have seen no evidence that this service is not a net positive for the community. The only 'evidence' ever mentioned by the Lord Mayor is that one woman says she doesn't like going to the local park?? As a long-term City of Perth resident, I am disappointed

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	that the Lord Mayor is playing petty games with women's lives in the name of politics. Ruah provides an essential service that I very much support.
65 (Received after consultation period)	I live in East Perth and do a lot of work and recreation activities in the city and I cannot say strongly enough - yes in my backyard for this. These are incredibly vulnerable women – not criminals - and it is an outrage that we are not immediately looking to house women in one of the richest jurisdictions in the world
66 (Received after consultation period)	Keep Safe Night Space open. It's insane it's not open with the rental crisis being what it is. Get your head out of the sand, city of Perth -let Ruah run this program again.
67 (Received after consultation period)	This is a vital service and must be protected.
68 (Received after consultation period)	The Safe Night Space is an essential service that provides much needed support for women who are sleeping rough. I live two buildings away from the previous space and I saw every day the amount of women in need and the relief the space provided to those women. We need to give these women somewhere safe to sleep as soon as possible.
69 (Received after consultation period)	The service is vital to the safety and security of vulnerable women, with Ruah's professional team to aid with the necessary support. This service would prevent further risk of harm, abuse and suicide, which would otherwise occur without this essential Women's safe service.
70 (Received after consultation period)	<p>Shelter is a human right. No person should be subject to oppressive policies and used as a pawn for personal political agendas.</p> <p>The service offered by RUAH serves as a vital Lifeline, offering a glimmer of safety, comfort, and essential resources to those in our community who are impoverished and facing challenging circumstances. Rather than hindering the operation of the Safe Night Space, the council should actively facilitate and champion its efforts.</p> <p>Our community needs a council that embodies compassion, fairness, and support for all its members, regardless of their socio-economic status. It is crucial that the council stands up for the local community, representing the diverse needs and challenges faced by its residents, rather than solely reflecting individual viewpoints.</p> <p>While the Safe Night Space may not provide a Long-term solution to address systemic injustices such as class, race, and housing beliefs and policies, it serves as an immediate support system for those in need of a safe night.</p>

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71 (Received after consultation period)	Critical importance of more safe, secure housing for victim/survivors of family violence
72 (Received after consultation period)	<p>Safe Night space provides a vital service for women experiencing homelessness or those at risk of violence. It cannot be overstated the difference this service has made, providing not only a safe space but also a point of engagement for both health and social support that might not otherwise be accessed. From a professional perspective SNS has provided the opportunity for myself and colleagues to engage, re-engage and maintain in care clients who otherwise had slipped through the cracks; including women suffering significant and untreated mental and physical health conditions, pregnant women and victim-survivors of sexual and physical abuse.</p> <p>The closure of SNS has re-opened a gaping hole in services and to ignore or minimise this is a poor and failing reflection of those in positions of privilege and power with the capability to rectify it.</p>
73 (Received after consultation period)	The CBD is a central place people in crisis naturally gravitate to due to the presence of services of all kinds. It is important they have a safe space, especially for women, that they know will be there for them.
74 (Received after consultation period)	Safe Night Space is a critically needed service that RUAH has been running beautifully for the past 2.5 years. RUAH has built genuine trust with the women who use the service and it would be devastating to lose that. I work just a few buildings down from the RUAH Engagement Hub and am positive that they would be well-suited to supporting the Safe Night Space until a new permanent solution is found. I hope that the City of Perth approves this application so that Safe Night Space can continue to support vulnerable women who need the space most.
75 (Received after consultation period)	Ruah has not just the experience of managing the Safe Night Space but also the relationship and understanding around the provision of care and support for these women. The central location is accessible for many who may also be without transport, has close proximity to police patrolling the area and is well lit. The building is already established for this work so can begin operations quickly and help these women who are at immediate and terrible risk.
76 (Received after consultation period)	As mentioned above, the engagement Centre is well lit, next to the Perth Police Station and central and accessible for people to get to.
77 (Received after consultation period)	Perth needs to support women whom have no options to access a safe environment at night

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78 (Received after consultation period)	<p>Education and protection are fundamental rights- when families grow up healthy, educated, safe and empowered, they can fulfill their potential to be leaders in their communities, countries and the world. Perth has a responsibility to ensure all women and their families have access to education and support that keeps them safe.</p> <p>We all know better so let's all do better!</p>
79 (Received after consultation period)	<p>Providing services to the clients through our soup patrol service was very rewarding and these vulnerable women deserve our support and a safe space.</p>
80 (Received after consultation period)	<p>Women should be and feel safe no matter the situation.</p> <p>This space provides a safe place and space for women to rest.</p>
81 (Received after consultation period)	<p>Street Connect provides advocacy, support, and referral to young people experiencing homelessness aged 15 -25 years. Safe Night Space provides an essential service for young women seeking refuge in a crisis situation - its flexibility and immediacy unlike any other for women over the age of 18 years. The James St Location provides accessibility and increased safety and a space for women to breath and plan their next steps in a supported manner. Street</p> <p>Connect call on the City of Perth to support their current interim solution and assistance in seeking a more permanent premises at this time.</p>
82 (Received after consultation period)	<p>I strongly support the proposal to run Safe Night Space at the existing Ruah Engagement Hub, Northbridge. This is an incredibly vital service which needs to be prioritised accordingly.</p>
83 (Received after consultation period)	<p>The incidences of Family and Domestic Violence continues to increase across WA Communities regardless of vulnerability. Many women finding themselves with no safe place to go after fleeing the perpetrator. The reintroduction of the Safe Night Space within the Ruah Engagement Hub ensures the continuation of a space in which women can feel space while longer term options are being explored.</p>
84 (Received after consultation period)	<p>Vulnerable women have a basic human right to feel safe and sleep safely. For the most vulnerable, with little or no supports and having no other options, the SNS has provided safety for women forced to sleep rough.</p>
85 (Received after consultation period)	<p>The Perth community needs a centrally Located hub for women to access given that many people tend to gravitate towards the city centre for services and support. Failure to support this</p>

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	interim arrangement will continue to see women at significant risk of harm.
86 (Received after consultation period)	Please do everything possible to supply a safe space for vulnerable people to rest and relax and enjoy being in a comfortable environment
87 (Received after consultation period)	Women experiencing homelessness are at high risk of harm from others, especially at night. Many women I have worked with have said they use drugs at night to stay awake to keep themselves safe. Safe night spaces is so important in providing safe night options for them and offering referral pathways for ongoing support.
88 (Received after consultation period)	this is a much needed service, I currently have women who are sleeping at the front of our female crisis accommodation as we are at capacity and they no its safe to sleep close by due to security on site. these women need a safe place to stay, I hear many stories of women being assaulted whilst sleeping rough. this service offers them a place that is safe to sleep whilst meeting their other needs whilst their like referrals to other housing options.
89 (Received after consultation period)	It is utmost importance that women have a safe place, where they can feel secure, warm acknowledged and all the things we expect to be able to take for granted. It is awful, atrocious that parts of our government has so little compassion and empathy for people who usually through no fault of their own have hit bad times, worse than bad times. Do the decision makers sleep comfortably and peacefully in their beds -I hope not.
90 (Received after consultation period)	Ruah has provided this service for our homeless woman very successfully and I support them in any solution to this very urgent matter.
91 (Received after consultation period)	Being that I am actually home less myself due to a narcissist. And have no job & no money. YES! Desperate for work- Had to leave job due to this person. I actually have a mortgage on this home! Pretty Sad. Especially when I am such a proud woman.
92 (Received after consultation period)	I been on the same space as these other women and having a safe place to stay really helps a lot.

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93 (Received after consultation period)	I have seen firsthand, the amazing work that Ruah do to help the most vulnerable people in our community. Without them there would be hundreds, if not thousands, of very vulnerable people without a safe place to go. They provide the most basic amenities such as showers, clean clothes, food and water and a comfy couch in front of the N. Things that we have that we take for granted. They also provide safety, support and ongoing assistance where they can to break the cycle of homelessness and domestic violence. The work Ruah do is critical and I wholeheartedly support their plan to operate the safe night space from the Ruah Engagement Hub. If you don't then I implore you to spend a day there because I absolutely guarantee it will open your heart and change your mind.
94 (Received after consultation period)	Ruah's support for our community must be backed
95 (Received after consultation period)	Ruah doing an amazing work supporting vulnerable women. There is an urgent need for safety and wrap around services. We are FDV specialised service and well aware of barriers faced by women trying to leave unsafe relationships
96 (Received after consultation period)	This is a very important service for the vulnerable people of Perth.
97 (Received after consultation period)	This isa vital service for the community. the safety of women and our children. Allowing children to grow up feeling unsafe is detrimental to our society and should be avoided at all costs. The health of our way of life and community at large is impacted by our treatment of those in most need whether we like that idea or not.
98 (Received after consultation period)	having worked in the DV sector for many years in a courts based environment, I know a safe night space for women and children is vital and can literally mean the difference between life and the unthinkable opposite.
99 (Received after consultation period)	As a nurse in an emergency department, I see far too many women who feel the brutal consequences of NOT having a safe night space. Their safety needs to be a community priority.
100 (Received after consultation period)	I support Ruah running Safe night spaces at the Ruah Engagement Hub as they have previously operated this model successfully in the recent past. Safe Night Spaces provided somewhere for women to be able to access crisis accommodation and basic support. Safe Night Spaces was a resource vulnerable woman sleeping rough could access as a place to rest and Link in with community resources. The appropriate patient cohort at RPH would access Safe Night Spaces to prevent prolonged hospital admissions due to Lack of accommodation.

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101 (Received after consultation period)	Ruah are experienced leaders in this space and should be supported to care for the most vulnerable women in our city. At a time where women are being murdered by men known to them at unacceptable and horrifying levels, it is baffling that the City of Perth would not support Ruah and this service.
102 (Received after consultation period)	<p>It was very disappointing to hear of the closure of the overnight shelter already provided by Ruah Community Services.</p> <p>Ruah has given great service to the community for years and particularly in supporting women caught in domestic violence and homelessness.</p> <p>It is imperative that this initiative be supported by the City of Perth and the state government. As a community we need to support those most in need. Ruah has been and continues to be one of the organisations that does this in many ways.</p> <p>I strongly request support for this service in James Street.</p>
103 (Received after consultation period)	The Safe Night Space provides safety for our most vulnerable women, and Ruah has the depth of experience to bring to it. Please allow them to operate it from its engagement hub in the interim.
104 (Received after consultation period)	This is an essential service for women in the City of Perth. I fully support the change of hours applied for by Ruah.
105 (Received after consultation period)	it is a very important space for women who dearly need it. I wish the City of Vincent would provide a space in our area as well.
106 (Received after consultation period)	This service is essential. The City of Perth should be placing MORE resources around this to support the service ongoing not taking active steps to shut it down. We cant afford to lose another women's life in the process.
107 (Received after consultation period)	Ruah are the best people for the job. With all the skills to help people in these situations.

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Submission	Comment	Response
1	<p>Although I believe the City of Perth could be doing much more this is a start and I support this.</p>	<p>We appreciate your acknowledgment and support for our services dedicated to vulnerable populations.</p>
2	<p>I strongly condemn and oppose the development of a third homeless service within the same block as this would cause additional stress and financial hardship to me and the business in the area.</p> <p>When I moved into our apartment three years ago there was 1 homeless shelter and I was happy with that as I didn't want to be a NIMBY like Rita Saffioti. However a third homeless service on the same block is getting a bit ridiculous, ghettoising the block and creating an unsafe environment in the park, the businesses, and for people trying to access police services.</p> <p>When Rita Saffioti opposed the local community and government's wishes by approving the drop-in centre she obnoxiously quoted that Northbridge aimed to be a dynamic community and she was making the community more dynamic by adding a second service on the same block. This third service is the opposite of dynamic and should not be concentrated in the same area.</p> <p>If you look at the best suburbs, the best classrooms, the best cities, they are made up of a diverse range of people. By concentrating all the homeless services in one area you are demolishing that and creating an unsafe environment for people at their most vulnerable and shutting down multiple businesses.</p>	<p>This application is for the temporary provision of a safe place for women to rest overnight in the existing approved community centre.</p> <p>We are unsure of what the submitter is referring to in terms of three homeless services in the same block. To our knowledge there will only be one homeless service in the area if what is being referred to is the Ruah Engagement Hub.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the data from the By Name List, which is the tool used on all State agencies in understand and tracking volumes pertaining to people experiencing homelessness.</p> <p>Ruah has prepared a comprehensive management plan relating to the safe night space for women. This will ensure that any amenity impact is minimised and where an issue arises can be resolved as soon as possible.</p> <p>Community services form an integral part of the fabric that underpins the amenity of the area surrounding the proposed site. This is reflected in the City's planning framework. The Safe Night Space for women will be carefully managed in accordance with the operational management plan and will not detract to any significant degree from the present amenity of the area.</p>

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		<p>The existing centre is 50 metres from a Perth Police Station and therefore any impacts to public safety or antisocial behaviour can be addressed promptly.</p> <p>There is no evidence to conclude that that the Safe Night Space that operated in East Perth or the Ruah Engagement Hub has resulted in business closures.</p> <p>In the Minister’s decision in approving the Ruah Engagement Hub it was identified by Dr Stephen Willey (Senior Member in Planning and Environmental Law in Western Australia 2Q2V) at page 368 that clause 67(2)(x) of the deemed provisions likely includes questions of ‘need’ for a particular land use particularly where the use is for the public benefit. Dr Willey goes further to explain at page 370 that there are cases where a community or public need overrides considerations as to loss of amenity of the locality caused by a proposed development. This was the case of Pinder Architects Pty Ltd v City of Stirling [No 1] (1995) 15 SR (WA) 13. The TPAT was satisfied that there was a public need for the development, a hostel for Aboriginal patients from regional locations in order for them to receive medical treatment in Perth. Therefore, the TPAT approved the development, finding that the public need for the medical facility outweighed the possible local amenity impacts for nearby neighbours, including noise and impacts on property values.</p> <p>There is no doubt that there is a need for the service. This is acknowledged by the City of Perth, the State Government, and the Community.</p>
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<p>3</p>	<p>I wholeheartedly support the development application proposal for the additional use of a Safe Night Space for Women within the existing Community Center. This initiative demonstrates a proactive and compassionate response to the unique safety concerns faced by women, providing a secure and welcoming environment for those in need.</p> <p>The integration of such a space within a familiar community setting not only addresses safety concerns but also fosters a sense of inclusivity and support. By approving this proposal, the City would be contributing to creating a community that prioritizes the well-being and security of all its members, ensuring that women have access to a refuge during times of vulnerability.</p> <p>This thoughtful expansion aligns with a collective commitment to fostering a safer and more compassionate community for everyone.</p>	<p>We appreciate your acknowledgment and support for our services dedicated to vulnerable populations.</p>
<p>4</p>	<p>I have been in Northbridge for over a decade now. It's my second home. I heard about a new homeless service centre that wants to open on James Street in Northbridge. We have a lot of trouble already, people stealing, fighting and spitting in and outside our stores. We are sick and tired of this as no one does anything to eliminate it. And now this mad house homeless centre wants to come to northbridge will only make things worse. Instead of sending them away from the city? They become zombies, with nothing to do and no money, they will start causing more trouble, more violence and only the businesses around will suffer as no family or individuals will want to come into the area.</p> <p>These homeless people are always passing out on the side walk. We call the cops, the cops come and give them a move on notice, but</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight. The existing site is used as the Ruah Engagement Hub and has approval. While the SNS is a new service the site is not a new centre.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of</p>

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<p>that's only temporary, they always come back. It's like the TV series (the walking dead)</p> <p>I came back from Europe last week, I stayed there for a month travelling around. Not once have I seen this kind of filth on the streets. Yes they are people, but we are people as well. We just want to trade in peace and go home to our families.</p> <p>We urge the city to decline the proposal of a homeless shelter as we, the business owners in Northbridge will not accept it. Why should we pay our taxes? so that these people get to bum around and cause trouble, why? Is it because we are a democracy? Is this democracy? We don't see this in other countries, why here. What are the foreigners going to say or already saying about the city?</p> <p>I know it's got nothing to do with you personally, however we are really tired of the situation in Northbridge and with a new centre opening up on James Street, it will only make our neighbourhood a lot worse. We also know that the lord mayor Basil is doing the best he can to stop this madness from happening and he has our full support.</p>	<p>which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p>
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		<p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
5	<p>While I sympathise with the women sleeping rough, I don't believe RUAH has the capacity or capability of managing a safe night space while keeping the local residents, business owners and their customers safe. What I have witnessed since RUAH moved into James Street is not conducive to giving me the confidence that we will not have further anti-social behaviour that we will need to deal with. It was exactly the same when they operated out of John St, nothing has changed and the conditions placed on them have been largely ignored.</p> <p>Having to deal with the bad behaviour, the spitting, stealing food off patron's tables and abuse from their clients while their staff and security just look on and do nothing is bad enough. To have this situation turn into a 24 hour issue is beyond reasonable.</p> <p>I understand that the Uniting Church has a facility already ready to go, why is this option being overlooked? I can see that RUAH is once again playing politics and John Carey is leading the way. The available funding is substantial and I can understand why RUAH is chasing it. I am under no illusion that this is not a business deal, RUAH's business is homeless people, and they have many volunteers doing great work. What everyone fails to see is the salary of the CEO, management and staff who make a good living off disadvantaged people.</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight. Ruah has operated a similar facility in East Perth for the last few years and is fully aware of the requirements of the clients and also the surrounding community.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p>

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	<p>As a land holder who owns property across the road from RUAH, I DO NOT want to see this organisation operate for any longer time period that was initially granted even after it was rejected by council and residents. Do residents and business owners have any rights left at all to enjoy their home and businesses without threat and abuse? Or is politics once again going to play the upper hand and bully their way to gain a few more votes?</p>	<p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
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		<p>The consideration of alternative sites is not a relevant planning consideration of this application, as each application needs to be considered on its merits not on other possible locations.</p>
6	<p>I strongly oppose any extension of hours and /or any variation to the Minister’s approval and accordingly, ask the City of Perth to outright reject the application by Ruah , as approval would have a serve and dire impact on the local amenity , businesses , residents and future expansion of the precinct .</p> <p>Namely, I refer you to my initial object to the DA in which Ruah had sought for the subject property back in early 2022 and which was rightly refused by council and ultimately approved by Ministerial intervention in September 2022 . The objection detailed significant concerns, most of which were also raised by many and numerous other objectors, to Ruah’s application.</p> <p>Since the Ruah operation has been in force at the subject property (which is less than a year) , there have been numerous issues /events relating to anti-social behavior , noise pollution , increased loitering and cleanliness , police and rangers called out frequently ,all of which do not bode well in providing for a safe , clean and inviting precinct.</p> <p>The City has a responsibility , irrespective of their planning scheme preferences , to ensure that the community is catered for in line with the Objectives and Intentions of the Scheme and I refer you to Section 3.5 and 6 of that Scheme .. I am aware the City has been provided with numerous footage of anti-social behavior and I urge you to avail yourself of that footage , it will give you an idea of what is really going</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction

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<p>on and what the residents and small businesses(including a hotel) in the immediate proximity ,are enduring .</p> <p>Another point of contention is whether the " Preferred Use", under which Ruah is seeking approval for, in such a built up commercial and residential precinct, along arguably Northbridge's premier and most prolific thoroughfare, needs to be dealt with by delegated authority in the first instance .Something of such a sensitive issue should be advertised and be dealt with by council not delegated authority .</p> <p>Whilst having the upmost respect toward the City’s planning personnel, the long term ramifications, in recommending approval , in the specific location are such that warrant much more scrutiny and should be considered by the members that represent their constituents .</p> <p>Ruah reiterates that the proposed current Ruah centre at 247 James ,which will accommodate the Safe Night Space (SNS) us only 200 meters from their current location , this should not make any difference in determining the application, especially given the SNP did not operate at their previous location in Shenton St and this was noted as NOT in the Ministers Approval Notification and as being a service that Ruah was going to replicate ,at 247 James.</p> <p>The negative impact to the community would clearly outweighed any benefit and further derailed any potential benefit ,to be derived from major infrastructure and development projects currently underway. These projects are obviously designed to revive the precinct, attract new businesses and encourage ongoing development, resulting in more inner city living and the creation of a safe and vibrant environment , inviting enough to welcome back local families and tourism and support the existing and new businesses ,who will be</p>	<ul style="list-style-type: none"> • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p> <p>While we understand the police station next door is not a “walk in” facility it is the station when all Northbridge police start and end their shift, making James Street and particularly the area around the Ruah Engagement Hub, one of the most visible active police presence streets in the City.</p>
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	<p>ultimately drawn to the area. As I am sure council is aware the original approval of the Centre resulted in the abandonment of 14 level mixed use development at 237 James , with the precinct now perceived as an undesirable location to undertake investment.</p> <p>Ruah continue to make a point of being located next door to the police station – I am not sure if they have completely comprehended that this police station is not a walk in facility that has police at the readiness . I have had to ask Ruah clients to move off my property on numerous occasion (some are now even sleeping there and this had never happened before in over 25 years of owning the property) and I have been sworn at , spit at and threatened . On some of these occasions, I immediately went into the police station (same one Ruah are referring to) and asked the officer at the front desk if he/she could call someone to come out and assist -I was told , this is not an operational station , you need to call 13444- so I am not sure how having a non-operational police station is going to help with anti-social behavior.</p> <p>Ruah cannot even control the issues they have now and they want to take more on. We have questioned their management plan on numerous occasions and yet to hear back from anyone – it seems no one cares about these small businesses and residents , who have worked so hard for many years to build a future for their families and now having to put up with this. When they first moved in, they asked us to meet with them and we did . They said they wanted to be good neighbors- we put forward some ideas in trying to control potential issues ,we suggested not to issue paper cups or allow them to take them out of the facility , given many of their clients just toss them on the pathing , we asked them to have an external security guard (which I was told was going to be the case) and they did for a few weeks ,</p>	
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<p>then gave up . We asked them to break up loitering and congregating clientele but they said , not their problem – any issues , we need to call council or police . We asked them to have their clients not leave any baggage /bikes etc on the footpath -originally they sought to address this but this now seems to have stopped.</p> <p>I recommend councilors and planners spend a few hours at the front of Ruah and see what is really going on and what we are being subjected to – only yesterday I was there and the police charged 2 people going crazy that just came out of Ruah.</p> <p>A number of small shops have closed down and even the police are against this – many have them stopped going to the café directly opposite Ruah and go further down the road, to avoid all the nonsense. There is screaming, swearing, fighting carrying on , bikes dumped at the front , people attending with dogs off leashes (council rangers have been called on numerous occasions) and people now sleeping overnight around the property , awaiting the facility to open. When they leave the facility they all hang around and dump their coffee cups and rubbish everywhere. It has now become a big meeting hub, where they all congregate.</p> <p>I am continually having to clean rubbish from the front of my property and wash the paving as it smells of urine - again , never had this problem before they moved in .There is fighting , swearing , people with unleashed animals, bikes, bags and clothing scattered over footpaths and not to mention people laying and sleeping across the footpath – all of which will just increase if Ruah obtains approval . The big picture here is that the additional hours will not only draw a few woman, as Ruah says, but many others will follow , including men and this has been proven to be so at Rod Evans Centre . Those that don't</p>	
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	<p>get in , will ultimately just sleep / set up outside the property or in the immediate proximity . Overtime more and more will join them and they will just filter all over Northbridge.</p> <p>Makes no sense for council to spend scarce rate payer money on infrastructure and beautifying the area , if ultimately , non-one wants to come there – there are so many competing offerings where people , whether it be individuals, families , locals and or tourists can enjoy a day out , without them feeling unsafe , unwelcomed and unappreciated , unlike what Northbridge and parts of the City is offering.</p> <p>I know the proprietor (property redacted) is at their “wits end “ dealing with the fall out of the current Ruah operation and if this goes through he has told me that he would seriously consider closing up , which would leave a large void in the precinct and ultimately there would be reduced patronage to the suffering small businesses (cafes etc) located in and around the hotel and apartment complex.</p> <p>I cannot see how council unanimously voted out the original Ruah application (I commend them for doing so – it was a difficult decision for such a delicate issue but common sense prevailed) on the basis of serious concerns and can now , having solid evidence that those concerns have come to fruition , approve Ruah’s current application.</p>	
7	<p>I am writing to you out of concern after receiving a letter from Ruah Community Services that they have put in an application with City of Perth to open their Safe Night Space program at their existing hub on 247 James Street, Northbridge.</p> <p>Though I morally support Ruah and the services they provide to the community it feels their services in the area are becoming too dense</p>	<p>Ruah do not see this proposed application as a long term solution, which is why the application only seeks a 30 month approval and would agree with the author that the Rod Evans Centre was indeed a more appropriate location.</p>

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	<p>to this part of Northbridge and a 'safe space' so close to the heart of the entertainment centre of Northbridge is a bad location to keep women at risk safe. It is also unappealing that the management around operating this space focuses on creating a less inviting environment with CCTV, enhanced lighting, and security patrols.</p> <p>I don't agree with the council's decision of the closure of the program at Rod Evans Centre, and I do have empathy for Ruah's desperation to find a solution but I don't think more services in this end of Northbridge is the answer. It'll become more of a slum with the centre being open at all hours and security patrols and lights at night... The current environment and being an entertainment precinct just seems like the worst possible place to set it up.</p> <p>I hope you consider not approving this application and that you are able to assist Ruah in finding a suitable space in this electorate or another.</p>	
8	<p>The City Of Perth, at the time, agreed it was the wrong place for their intended use.</p> <p>For the same reasons presented at that time I even more strongly object to the proposed changes to the decision which was forced on the City Council then.</p> <p>Because of social problems and safety concerns to local residents and to business it is the wrong place for the proposed use.</p> <p>A more suitable site needs to be found for homeless people.</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the</p>

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		<p>2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 or 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p>
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		<p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
9	<p>I refer to your request for Community Consultation relating to Ruah's application to the City of Perth proposing an additional use of a safe night space for women at 247-249 James Street Northbridge, which I, together with the residents, businesses and their patrons in Northbridge, strongly object and oppose additional use together with any extension of hours at the 247-249 James Street Northbridge premises.</p> <p>The City of Perth needs to refuse Ruah's additional use and extended hours application as it has been eminent and proven that the existing use at 247-249 James Street Northbridge has severely impacted the residents, businesses and their patrons in Northbridge, all of whom strongly oppose any proposed extended hours and additional use of the premises.</p> <p>Ruah's presence at 247 – 249 James Street Northbridge has caused numerous issues for the residents, businesses and the community in Northbridge. As a result of the numerous issues that have arisen, the City of Perth has implemented "City Watch" "See It" "Say It" as there have been continuous issues with loitering, obstructing footpaths, rubbish and beggars.</p> <p>The City of Perth have undertaken their duty of responsibility to the Northbridge residents, businesses and patrons, with implementing</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Street in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at the rate of 2 or 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure

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<p>their “City Watch”. I am required to continually call City Watch requesting Ranger assistance to attend loitering, footpaths being obstructed, rubbish and beggars.</p> <p>Residents, small businesses and landlords have worked hard to build a future for their families and to maintain a vibrant and safe Northbridge precinct.</p> <p>As a property owner in Northbridge, tenants have raised concerns regarding Ruah’s presence and the proposed application for additional use and extended hours at 247 – 249 James Street Northbridge.</p> <p>The City of Perth needs to continue to commit to maintaining Northbridge as an entertainment precinct, a safe and family friendly environment.</p> <p>I work in Northbridge and see first hand the current issues and any further use of the above premises or extended hours will exacerbate the many issues already faced by the Northbridge residents, businesses and local community. As a result of Ruah’s current presence, the residents, businesses and their patrons, and the local community have witnessed and been subjected to anti-social behaviour, loitering, seen rubbish abandoned and concerns for safety. The City of Perth needs to avoid exacerbating the issues already existing, therefore, reject Ruah’s application for additional use and extended hours at 247 – 249 James Street Northbridge.</p> <p>Again, the City of Perth must reject Ruah’s application for the additional use together with any extension of hours at the 247-249 James Street Northbridge premises.</p> <p>Always striving to create a better, stronger and safer Northbridge and wish to thank the City of Perth for their support from all the residents,</p>	<ul style="list-style-type: none"> • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
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	businesses and the local community of Northbridge, who are working together to better Northbridge and attempt to restore and maintain Northbridge as an entertainment precinct, a safe and family friendly environment.	
10	<p>I wish to strongly object and oppose Ruah’s application for additional use and extended hours at their 247 -249 James Street Northbridge premises, and ask the City of Perth to outright reject their application as approval would have a serviere and dire impact on the local community, businesses, residents of Northbridge.</p> <p>Since Ruah opened at 247 – 249 James Street Northbridge, there has been numerous issues relating to anti-social behaviour, noise pollution, increased loitering and uncleanliness, which has had a severe impact on the residents, businesses and patrons in the vicinity of Northbridge. Any further use at these premises will only cause continual and more problems for the hard working small businesses and their patrons, the residents and the local community.</p> <p>The numerous issues that Ruah’s presence have created will only be enhanced with Ruah’s application for proposed additional use and proposed extended hours, therefore, in City of Perth must reject Ruah’s application.</p> <p>Ruah’s presence have many residents, businesses and their patrons, together with local community, who are already dealing with the anti-social behaviour, rubbish and fear of their safety and they are concerned that any approval for further use together with any extended hours will intensify all the existing problems.</p> <p>The City of Perth must work together with the residents, businesses and their patrons, together with the local community to ensure</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 or 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities

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	<p>Northbridge remains an attractive, safe and vibrant precinct for the residents, businesses and their patrons and the local community.</p> <p>Again, as a result of the many issues and strong objections from the residents, businesses and their patrons, and the local community, the City of Perth must reject Ruah’s application for additional use and extended hours at 247 – 249 James Street Northbridge</p>	<ul style="list-style-type: none"> • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
11	<p>Reports from the Rod Evens Centre (who's clients are being redirected to the Ruah Centre located at 247-249 James Street) will wholly exacerbate the anti-social and mis-management issues currently being experienced at 247-249 James Street Northbridge. I believe the City of Perth should be asking the Ruah Centre management to provide their Ruah report of the 247-249 James Street operations to understand</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p>

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<p>their negative behaviour statistics before embarking on any decision regarding the operating hours of the RUAH Centre in Northbridge</p> <p>I have lived at my property located since 2006 which during this time have been approached by the City of Perth to be a 'gracious neighbour' by allowing later noise curfews to cater for events such as FringeWorld Festival, Metro's Nightclub, Other local Special Events (St Patricks Day), other Russell Square events to which I, as a ratepayer have happily agreed to, as the requests have been fitting to the location of the entertainment precinct events and the City's vision for the P1 Northbridge Precinct.</p> <p>Firstly I should state, that since the change of use for 247-249 James Street Northbridge, the neighbourhood has suffered greatly at the hands of serious anti-social behaviour, increased littering, loitering, Ruah Centre and neighbouring property damage, increased thefts, abusive outbursts to innocent bystanders / local cafe customers, (unprovoked) attacks on passers-by, pedestrians, visitors to our state / country from overseas visitors staying (across the road) at Best Western Northbridge. It should be noted that as a direct result of the RUAH clients poor behaviour and anti-social activities, the previously established businesses across the road from RUAH (247-249 James St) have terminated their leases due to their customers being deterred from being in the location where the anti-social / abusive attacks are becoming more and more frequent.</p> <p>The RUAH Centre was given its approval by the Planning Minister on the condition that the RUAH Centre abided by its Management Plan (attached) and requirements which specifically forbids loitering out the front of the 247-249 James Street Property. The video's presented to the City of Perth clearly shows that the RUAH management has</p>	<p>The Ruah Centre for Women and Children on Shenton/John Street is a referral based service and will address the needs of a different client cohort to those that attend a Safe Night Space.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff
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<p>failed in its operations to properly abide by the mandated Management Plan Guidelines, loitering continues in abundance, the violence, the littering (including defaecation and urination on James St) is not being 'managed', policed, curbed by the RUAH operators. I have been kicked (twice) by a RUAH client when I exited the (address redacted) James Street property then spat on when I was not able to give the RUAH client cash money. I should be able to leave my apartment and go out onto the street (peacefully and freely) on which I live without being attacked. Prior to RUAH taking up residence across the road, I have never encountered such behaviour or attacks before in my 17 years of living there.</p> <p>Secondly, I bought my property in Northbridge to be a part of the Northbridge entertainment vibe and to support events like FringeWorld, Australia Day celebrations, Chinese New Year celebrations, Drone Displays, Other Cultural events (Greek Festival), PRIDE Events, parades and the Christmas Lights - all of which my ratepaying funds proudly support / sponsor. My understanding is that it is not the City of Perth's (financial or physical) responsibility for the welfare of Perth's 'at risk' community - this is very clearly a function of the State and Federal Governments for which our taxes and mining royalties fund.</p> <p>Furthermore, the Boorloo Bidee Mia facility is a purpose build 100 bed homeless facility that continues to be under-utilised and is far better positioned (near to Royal Perth Hospital, which also has upgraded its wards to assist in giving safe haven to persons with mental health issues).</p> <p>In addition, the RUAH Centre has nearly completed its 7 storey facility on John / Shenton Street which is a purpose built facility that is</p>	<p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
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<p>specifically designed to provide safe haven for women and children at risk. I understood this was originally to be completed in 2023 however, I see that it is very close to completion therefore making the requirement / request for RUAH's extension to its operation hours redundant.</p> <p>The City of Perth needs to be clear about what was being asked to be observed by our Town Planners, and as the locality has previously had locality research town planning studies done regarding the P1 precinct and surrounds. These Town Planning approvals have been the basis of the Northbridge Study Report recommendations / vision (refer: Northbridge study 1991 - which formed the basis of the vision for Northbridge today - an entertainment precinct with mixed living). The RUAH centre operations at 247-249 James Street under their current management guidelines have been clearly demonstrated as being unpoliceable, not able to be made wholly conditional or enforceable management guidelines - as we have sadly discovered. (Again the RUAH Operations Report should be assessed by the City officers to understand the extent of the RUAH recorded incidents - including broken window/ door).</p> <p>I also emphasise that the original Town Planning vision was for the entertainment precinct of which the residents agreed to accepting a later noise curfew time which I think has been forgotten about. The City of Perth's intention was to have our area along James street and the local area which has a high density domestic living. At no time did we agree to change this locations use to Community use however what they Government is trying to impose now is to have the locality deemed as Community Use and Entertainment Precinct of which the both uses are not neither compatible or workable side by side due to the anti-social behaviour of displaced / homeless people coupled with</p>	
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	<p>RUAH's history of not being able to operate under the government prescribed guidelines for anti-social behaviour / security as well as the high level of loitering / littering incidences which we have witnessed including imposed anti-social attacks on locals who are trying to enjoy the amenities and cafe ambience which the Entertainment Precinct attempts to promote. However, what we have found is that Zonts customers are being harassed, their food being stolen from their plates, locals having their push bikes stolen, BWNA operations and patrons being harassed, confronted, verbally and physically abused, sworn and shouted out. regular events of RUAH attendee's urinating and defecating at the BWNA premises.</p> <p>The City of Perth sold to the Locals of the P1 Precinct that we would be afforded the benefit of a vibrant and festival / entertainment based precinct of which we would also asked to approved greater noise curfew restrictions being lifted to accommodate Fringe World Festival and the other various cultural festivals held at Russell Square and surrounds. This is the platform on which we should remain firm as we (the local ratepayers) have already been asked to accommodate - which we happily have however, the lack of controls being operated and enforced at the Ruah Centre currently operating at 247-249 James Street is highly evidenced as to the management plan not being enforceable, policeable or tolerable to the local businesses. Had I known that the Change of Use for this location would be approved I can assure I would never have bought in the P1 Precinct location.</p> <p>I understand that the Wellington Street Boorloo Bidee Mia Centre has been reaching out for assistance in managing the facility and would appreciate the experience that the RUAH Operations could proffer their assistance. I also believe that the Ruah proposal for 247-249 James Street is in direct contradiction to the Statement of the Town</p>	
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	<p>Planning intent for the area west of Milligan Street incorporating James Street (west). Nowhere in this Town Planning Plan does this location have or make provision for a short-term homeless accommodation shelter only special provision was made for Ruah on Shenton Street under special resolution which didn't extend to James Street.</p>	
12	<p>We are renting an office at 228 James Street and offer a great short term holiday units 14 in total for northbridge in the building.</p> <p>We are already losing business because of the RUAH across the street.</p> <p>We are getting loads of complaints from people overseas and interstate about anti-social behaviour.</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 or 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure

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		<ul style="list-style-type: none"> • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
13	<p>I am writing to you at the COP to lodge my objection to the proposed changes at 247-249 James Street in Northbridge. I bought an investment property across the road at (address redacted) James Street which caters for short stay accommodation primarily for visitors to the city of Perth. The location, at the time of the property</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight. The objectives contained in the City’s planning framework cater for a diversity of demands and the enhancement</p>

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<p>purchase, was a quieter part of Northbridge with al-fresco dining and coffee shops in the area that factored into the investment decision taken then. The location, P1 precinct in Northbridge, is meant to cater for entertainment, tourism & al-fresco dining celebrating the arts. Unfortunately, since the RUAH drop-in centre opened at 247-249 James Street, the location now experiences unruly and threatening behaviour which unfortunately impacts future business for leasing short stay accommodation. Some visitors/clients have already raised complaints and I note that there have been sporadic incidents at our building already as a result of the RUAH drop-in centre.</p> <p>With the latest new proposal for an overnight shelter at 247-249 James Street, the location will most likely evolve into a full-time homeless precinct going forward. This will have an adverse impact on future business as well as property valuations. I fully understand the need to address the chronic homeless situation but believe other more suitable locations, such as Wellington Street, should be used instead. Placing a shelter in an entertainment precinct does not make sense.</p> <p>I therefore urge the City of Perth to reconsider their decision and look at more suitable alternatives.</p>	<p>of health and safety. This includes a range of social and cultural facilities and services. Schedule 3 of CPS 2 contemplates a range of entertainment, educational, healthcare, and community and cultural uses within the Northbridge Precinct. The Northbridge Precinct Plan seeks to locate compatible non-residential uses, such as ‘community activities,’ west of Milligan, Shenton and Palmerston streets.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework
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		<ul style="list-style-type: none"> • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p> <p>The consideration of alternative sites is not a relevant planning consideration of this application, as each application needs to be considered on its merits not on other possible locations.</p>
14	As one of business owner in Northbridge, we are strongly objecting to the use of 247 James Street for safe house. Since RUAH moved to James Street, we have seen more anti-social behaviour from RUAH clients. We have to be more vigilant when they come to the store as	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p>

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	<p>there's more stealing. We have also experienced more abusive behaviour towards us and staffs.</p> <p>Surely, they can be placed somewhere else. Where it's not going to disrupt businesses. Northbridge is an entertainment precinct, people bring their families and small children to Northbridge. Please safe our businesses or all businesses in Northbridge by encouraging families to come to us, not the other way.</p>	<p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration</p>
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		<p>Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p> <p>The consideration of alternative sites is not a relevant planning consideration of this application, as each application needs to be considered on its merits not on other possible locations.</p>
15	<p>I recently purchased a property in September at (address redacted) James Street. After settlement, I noticed that the RUAH centre across the road experiences threatening and unruly behaviours towards people in the vicinity, making it quite intimidating and not a nice experience to live in this part of Northbridge between the morning and afternoon. When we purchased our property, my understanding is that our property is in the P1 district of Northbridge which is meant to cater to tourism, dining and entertainment.</p> <p>With the proposed changes for an overnight shelter at 247-249 James street, this area will most likely turn into a 24 hour full time homeless</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p>

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	<p>precinct in Northbridge, making it an unpleasant place to live as well as bringing property values down.</p> <p>I understand the need to address the homeless situation and supply shelters in Perth, however the decision to house these people in Northbridge does not make sense as this is the biggest entertainment and nightlife district in Perth, I am sure there are better locations which would help to facilitate these people.</p> <p>I would also like to highlight the recent closure of the shelter at the Rod Evans centre in east Perth where the City of Perth closed it down due to complaints from surrounding residents. I do not think it is fair that this shelter is now moved across the road from our property in Northbridge.</p>	<p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p>
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		<p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
16	<p>I am writing to you at the COP to lodge my objection to the proposed changes at 247-249 James Street in Northbridge. I bought an investment property across the road at (address redacted) James Street which caters for short stay accommodation primarily for visitors to the city of Perth. The location, at the time of the property purchase, was a quieter part of Northbridge with al-fresco dining and coffee shops in the area that factored into the investment decision taken then. The location, P1 precinct in Northbridge, is meant to cater for entertainment, tourism & al-fresco dining celebrating the arts. Unfortunately, since the RUAH drop-in centre opened at 247-249 James Street, the location now experiences unruly and threatening behaviour which unfortunately impacts future business for leasing short stay accommodation. Some visitors/clients have already raised complaints and I note that there have been sporadic incidents at our building already as a result of the RUAH drop-in centre.</p> <p>With the latest new proposal for an overnight shelter at 247-249 James Street, the location will most likely evolve into a full-time homeless precinct going forward. This will have an adverse impact on future business as well as property valuations. I fully understand the</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p>

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	<p>need to address the chronic homeless situation but believe other more suitable locations, such as Wellington Street, should be used instead. Placing a shelter in an entertainment precinct does not make sense.</p>	<p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
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<p>17</p>	<p>I am the owner of (address redacted) James Street in Northbridge and I have just been made aware that the Ruah facility, which I originally objected to and now located at 247 James Street, is seeking to extend their operation to include a Safe Night space, which will see the center opening for virtually 3 times the hours more than that which they had initially proposed and ultimately were approved for.</p> <p>I find this most concerning as the consequences of the City and or State Government in approving this application, will only see an increase in the level of anti-social behavior, loitering and rough sleeping, all of which have become apparent since the Ruah facility opened. We had no issues of this sort before Ruah got their approval and business up and running and it gets worse by the day. The bases for my initial objection have now been proven correct. These days it is not uncommon to find groups and individuals, whom are clearly Ruah clients, loitering, laying and sleeping at the front of my property and numerous other immediate properties (albeit I have no doubt that filter all across Northbridge as the day progresses) . There is always rubbish and private belongings scattered across the front of properties, whilst they take refuge and await for the facility to open . Even after the facility closes they are still loitering around with some now deciding that it is a good place to set up camp.</p> <p>Accordingly , I strongly urge the council to outright refuse the application and contest any attempt by the Planning Minister to overrule them, as was the case last time</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff
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		<p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
18	<p>There is little to be gained in regurgitating all the concerns that local residents and businesses had with the original proposal, except to say their concerns have been realised. Sadly, small business operators have either had to close or made the choice not to renew their Leases. A much loved local precinct that has grown organically has been severely affected by bureaucratic indifference to the local community.</p> <p>It is insane to think the proposed expansion of the existing facility and its operations will in anyway improve the amenity of that section of James Street.</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p>

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	<p>For the same reasons the Council unanimously rejected the earlier application in 2022, so it should for this application.</p>	
<p>19</p>	<p>I'm shocked that RUAH were placed into Northbridge, a place where we get visitors from all around the world. It gives Perth a very poor image and doesn't do this beautiful State any justice.</p> <p>As an owner of a property in James Street I have seen vandalism, crime and damage to private property.</p> <p>I fear for people visiting this area, people staying at the Best Western and other hotel and short stay chains in Northbridge.</p> <p>I'm all for helping the disadvantaged, but I object to having RUAH in James Street, Northbridge has a poor history and I would be thinking COP would look at fixing it.</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>Ruah have been in Northbridge since the 1950's.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework

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		<ul style="list-style-type: none"> • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
20	<p>I am writing to you at the COP to lodge my objection to the proposed changes at 247-249 James Street in Northbridge. I bought an investment property across the road at (address redacted) James Street apartment, which caters for short stay accommodation primarily for visitors to the city of Perth. The location, at the time of the property purchase, was a quieter part of Northbridge with al-fresco dining and coffee shops in the area that factored into the investment decision taken then. The location, P1 precinct in Northbridge, is meant to cater for entertainment, tourism & al-fresco</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub</p>

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	<p>dining celebrating the arts. Unfortunately, since the RUAH drop-in centre opened at 247-249 James Street, the location now experiences unruly and threatening behaviour which unfortunately impacts future business for leasing short stay accommodation. Some visitors/clients have already raised complaints and I note that there have been sporadic incidents at our building already as a result of the RUAH drop-in centre.</p> <p>With the latest new proposal for an overnight shelter at 247-249 James Street, the location will most likely evolve into a full-time homeless precinct going forward. This will have an adverse impact on future business as well as property valuations. This investment is now already being impacted and has caused our family to lose money due to the current situation and even more if the proposed changes are passed.</p> <p>I fully understand the need to address the chronic homeless situation but believe other more suitable locations, such as Wellington Street, should be used instead. Placing a shelter in an entertainment precinct does not make sense.</p> <p>I therefore urge the City of Perth to reconsider their decision and look at more suitable alternatives.</p>	<p>on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p>
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		<p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
21	<p>I vote against this application.</p> <p>I live opposite, facing this building and have seen a rise in homelessness sleeping in front of buildings next door with a lot of anti-social behaviour.</p> <p>I fear for my safety everytime I enter/exit my apartment.</p> <p>I urge the council to consider a more appropriate location.</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p>

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		<p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
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<p>22</p>	<p>I object to the Application for Additional use of the RUAH occupied building, 247-249 James Street, Northbridge.</p> <p>Please understand I do have a great deal of compassion for people who find themselves homeless, subject to Domestic Violence and / or low income. Making an objection is not at all simple for me - Northbridge is not the solution.</p> <p>I do hope that all levels of Government and Service Providers can work together for a solution that considers all parties.</p> <p>As an owner/occupier for over 20 years, I have witnessed the slow but sure neglect of James Street and surrounds.</p> <p>I strongly object to constantly witnessing the disregard for other people, the verbal encounters and abuse, the begging for money, cigarettes and the aggravation that can already occur in the area. Certainly, this can occur in parts of town however my concern at the moment is Northbridge.</p> <p>The sorts of things I am describing do not leave a good impression of a section of the city that relies on residents, visitors, Tourism, Entertainment, Restaurants and Café business for the local economy.</p> <p>I have previously objected to the changes of use for that building. It is extremely difficult to determine what changes will be asked for next.</p> <p>I believe Ruah has access to another suitable premises such as Tranby Hub that can be used for the same purpose.</p> <p>The reasons for my latest objection are:</p> <ul style="list-style-type: none"> • Northbridge already has a bad reputation and is considered unsafe. It is not a place for women in distress looking for assistance. 	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff
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	<ul style="list-style-type: none"> • 247- 249 James Street is in a “quieter” part of Northbridge however 247 James is in a mixed used part of the street. The mixed use includes: <ul style="list-style-type: none"> - small businesses, - a Hotel (Tourist) complex and - Residential apartments complex directly opposite the building • The impact of RUAHs operations is not just on James Street itself but the surrounding residential apartments / small businesses bounded by Fitzgerald and John Streets and Shenton St, and Russel Square. • The continued expansion of services offered by RUAH also further impacts the mental wellbeing of the people living and working in the area. Subconsciously there is a tendency to develop a nervous feeling of distrust of the street people who roam the area. At 247-249 James it becomes a situation of the RUAH clients feeling they are being watched and vice versa for the Residents / Tenants / Visitors of the area. • The entrances to Business and Residential buildings are often being used by people to sleep in and urinate is a constant problem for some of the Apartment foyers • There are people sleeping in Russel Square and in Cars. Quite often the people in the park are passed out. Yes, I have checked on some of them to see if they are ok. • Along James St there are “homeless” sitting in front of shops or sprawled over the footpath without any thought to the shop owners trying to make a living or the passers by going about their business. 	<p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
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	<ul style="list-style-type: none"> • The state of James Street on various occasions is a very scary thing for young children and visitors. I have watched the children’s look of fear or distress when they are walking down the street with their parents. It is heart breaking. • The lighting in James Street is not adequate and quite often the streetlights are diminished or not working. This becomes a safety issue. • I have witnessed the Police telling a man, who was loudly yelling profanity to settle down and stop yelling. His loud response was basically “you can’t f@#\$ tell me to stop yelling. This is only one example of people roaming the street telling the Police what they can and cannot do. • People are already sleeping on the bench or within the area of the swings. This precludes the use, by young families, of what is currently a very popular swing park. 	
23	<p>I am writing to notify you of my objection to the COP proposal to increase the hours of use at the Ruah drop in centre. I have an investment property within the (address redacted) James street and also operate a business in the area, this building being short stay caters mainly for tourists and holiday makers to the city. Being on the fringe of Northbridge entertainment precinct with its little coffee shops and beautiful townhouses is a gem of the area, but this is on a steady decline since the introduction of the current Ruah centre. The intimidating, noisy and anti social behaviour is witnessed daily and is very off putting for tourists, guests and residents alike. My fear is that by increasing the Ruah hours to a night shelter will only bring more and more anti social and unruly behaviour to the area and continue all night, which is detrimental to the overall vibe of this precinct and the sustainability of short stay businesses.</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as</p>

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	<p>The Best Western Complex along with many other in the area have already suffered considerable impact from the current Ruah centre and it is unreasonable to continue increasing the strain on these businesses and surrounding residents.</p> <p>Whilst I am sympathetic to the people that will attend this centre I am also of the view that there should be many other more suitable locations to help both the Northbridge area and the vulnerable people that need the help. It seemingly makes very little sense at all to be placing a shelter for disadvantaged people of any form in an entertainment precinct.</p> <p>I strongly urge the City to please reconsider the location of this facility and look for more suitable locations.</p>	<p>reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p>
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		<p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
24	<p>I have been a business owner, property owner and resident of Northbridge since March 2004. At the time, we took a gamble and believed in the future of WA. Not only did we believe but invested everything we owned into this part of the city. Yes, we had heard all the negativity, but we believed in the vision for this part of this city. The bright future that Northbridge promised was what we believed in and, not long after our arrival in Northbridge, our family started to grow.</p> <p>As the years went by, we became big advocates for Northbridge and lived it's many transformations. We were extremely pleased' with the government's vision at the time and the plans that were in store for Northbridge. These plans for Northbridge did include higher density living. I saw how like us, many people also bought into the vision for inner city living, higher density living in the city and inner-city areas.</p> <p>We continued to align our family's future with the future of Northbridge. Why wouldn't we? This was going to be to area to live in. As such, we heavily invested in real estate in Northbridge.</p> <p>Tourism and hospitality are industries that we invested our time and money into, and I have to say that, for many years, it supported our family well. Fast forward to March 2023, this is the commencement I believe of the decay to this area of Northbridge. RUAH has been the single most disruptive addition this area has ever seen. We originally opposed RUAH establishing a drop-in centre at their current 247 James St location. My objection was mainly about wanting to keep anti-social</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities

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<p>behavior away from this precinct and it came from 'lived experience.' Our objections and reasons for objections have been vindicated.</p> <p>We witness anti-social, disruptive behavior daily. The amount of people that RUAH attracts to its 247 James Street location is growing and growing. A week rarely goes by without the usual; get f\$&*ked, f\$&*k off, go away or I will kill you, it's not your pavement etc. The police are constantly in 247 James St. RUAH clientele includes homeless peoples and a large percentage have issues with drugs, alcohol, violence and mental health issues. Now I ask, how could this type of behavior and witnessing this every day be supporting tourism and hospitality? It's embarrassing! We do our best to calm the fears and concerns of the café and hotel guests.</p> <p>RUAH currently operates from 0830hrs to 1400hrs. Even with those hours, there are people constantly loitering around this area. Before RUAH bullied their way into this location, we never experience the constant:</p> <ul style="list-style-type: none"> • Loud swearing on the street • Constant screaming and fighting • Physical fights between RUAH clients • Verbal and physical abuse of their security guards • Increased crime activity on this end of James St • Had to clean human waste around my premises. • The contact rubbish. • Threats received when asking RUAH clients to leave my place of business • Constant physical threats • Contact abuse 	<ul style="list-style-type: none"> • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
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<ul style="list-style-type: none">• Inconsiderate clients of RUAH with their constant carrying on and amplified music where businesses and just trying to trade• Ferocious looking dogs often with no lead, being left to roamer this part of James street as the owners are RUAH clients. <p>Many businesses in this area suffered during COVID. My hotel business did suffer greatly during COVID. At the commencement of 2023, we were primed to move forward with my hotel business. RUAH has killed any chance of recovery!.</p> <p>I really feel that the state member for Perth has no empathy nor has any idea of what is required to run a business. I write this as this is the only logical explanation that would see him place these vulnerable people next to all the things that they have problems with: drugs, alcohol, petrol station, hardware store, entertainment venues etc. I would have thought the prudent thing is to keep people away from things they have a problem with and not just place them amongst it all.</p> <p>The last couple of months or so have been a realization period of whether it is worth continuing to fight. I am passionate about my business and Northbridge. I now must accept that regular anti-social behavior is the new norm. This bad situation will get even worse as RUAH wants to operate accommodation between 1900hrs - 0700hrs. This part of James St will effectively become a 24-hour homeless precinct. Have we not learned anything!? Do we continue to sacrifice productive businesses cause their existence is not as important as the needs of the homeless? We have fought long and hard for this area to be kept clean of anti-social behavior. We fought hard when the system let us down by the undemocratic decision on the State Labor Government.</p>	
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	<p>RUAH has killed my business! As I write this, I cannot guarantee that my business will survive the first year of RUAH across the road. One guarantee I can make is that my business will NOT be here if RUAH establishes and operates overnight accommodation. Haven't we learned the lessons of the Safe Night Space in East Perth? Why is it now acceptable to move the daytime time anti-social behavioral problems (that were evident during the day at the Rod Evans Centre) to this part of James St? Why is it that the Member for Perth thinks it's acceptable to keep dumping on Northbridge?</p> <p>It is a well-worn saying that to do the same thing and expect different results is the definition of madness. The issues mentioned are not new and it appears that we are just relocating the same problems as the article in the link describes.</p> <p>I am a father our three dependent children. This hotel business is 'the family business!' Whether I continue or not with this business is no longer just a commercial consideration. It is now also an occupational health and safety consideration. We all know what happens when passionate managers intervene in issues that are happening on the street near their place of business-think of the late Giuseppe Raco who was killed during his shift as the manager of the Paramount Nightclub. I fear that there is a real danger to me personally in continuing this operation with the level of anti-social behavior now at my front door.</p> <p>The RUAH situation does not only affect my business, but my staff and local businesses. We are all affected by this. On and off, I have approximately 10 staff members. I am finding that there are now less hours for my staff and my front office staff are constantly having to keep RUAH clientele away as they are not here to conduct lawful business with us. The employment of my staff, particularly my front</p>	
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	<p>office staff, has become increasingly dangerous as they find themselves having to deal with RUAH clients causing a nuisance and quite often intoxicated or coming down from a number of substances.</p> <p>The downturn in business for me also affects some of the local businesses. The more people we accommodate, the more that they will support the local community. All that RUAH is assisting to do is to decrease visitation to this area affecting all rate and tax paying businesses in this area.</p> <p>On behalf of my family and I, and as a Northbridge Stake holder, please find another place for the women's shelter. The Tranby House precinct in East Perth has become quite a dangerous area and somewhat of a 'no go' zone. Please do not turn what used be affectionately known as the "Paris end of James St", into to a dirty and dangerous area. This area will be tarnished for years with this negative legacy hard to shake off. The way it's heading WAS NOT the COP's vision for James St! Please do not forget the large number of residents that live around this area who will now find this these issue at their front doors.</p>	
25	<p>I strongly object to the current development application which seeks to include additional use of a safe night space for women.</p> <p>I am currently already having to deal with the anti-social behaviour caused by the current RUAH facility. This includes aggressive behaviours, swearing, threats of physical violence and unpredictable behaviour.</p> <p>If this new development proceeds, it will add to the issues that are listed above which I am very concerned about.</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p>

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	<p>Northbridge will go from a place that currently has booming cafes, safe residence and tourism to a homeless dumping site which is unsafe to go anywhere near.</p>	<p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p>
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		<p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
26	<p>RUAH has not adhered particularly well to its existing management plan. Any expansion of the services it offers is all but certain to have a greater adverse impact on the direct surrounds.</p> <p>Northbridge is the licensed liquor capital of Perth. Can it reasonably be considered to be the safest place for a safe night centre?</p> <p>Town Planning decisions are often the thin edge of the wedge. Once approved, precedents are set. Do we want the West end of James Street to mirror what has occurred in the East end of Aberdeen Street?</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p>
27	<p>I strongly object to current development application seeks to include an additional use of a safe night space for women, operating from the site between 7:00pm and 7:00am seven (7) days a week.</p> <p>The anti-social behaviour that is already being experienced from RUAH operating between 8:30am to 2:00pm Monday to Friday is unacceptable and severely impacting the surrounding residence.</p> <p>The opening of this development will only add to the issues. There will be loud sounds all night, violent men trying to follow these women, drug related issues & poor management. These women will be out</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p>

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	<p>loitering on the streets out the front of RUAH causing disturbance to neighbours and noise issues.</p> <p>They will be out the front of the RUAH building to smoke & speaking on their phones at unreasonable hours of the night.</p> <p>The management of RUAH is already extremely poor, from 7am there are people out the front sitting all over the street, swearing, off their faces on drugs with security having no control over them. Even during operating hours, the security have proven to have no control.</p> <p>We purchased 2 properties in this area which we certainly wouldn't have if we knew that the city was intending to change the use of the location from entertainment precinct to a homeless precinct.</p> <p>There are plenty of vacant buildings in a better suited location then across from a residential area.</p> <p>Again, I strongly object and believe that the rates payers in the area should be considered.</p>	<p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p>
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DA-2023/5406 - Schedule of Submissions – 247-249 James Street, Northbridge

		<p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
28	<p>We are the owners of property in James and Lake Street and we wish to express our concern for the extension of services proposed by Ruah. We originally objected to the initial proposal of the Ruah Centre and sent you our objections together with many business owners and residents of the area.</p> <p>It is with great concern and trepidation that the Ruah centre will be allowed to extend its hours to virtually a 24 hour centre. The current situation at Ruah has been tolerated by business owners because of the limited hours of operation. If the proposal goes ahead, however, it changes the whole situation and will only aggravate the volatile environment in Northbridge which has been a concern to the public for many years. Northbridge is not a suitable or safe area for women escaping DV. A quieter area away from the possible mayhem and the occasional volatile environment of Northbridge would be a better choice. Northbridge is the wrong location!!</p> <p>We are aware and appreciate that the City of Perth has invested heavily in improving and attracting new business to the area. Equally, we have seen evidence that the private sector, including ourselves, has</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This submission does not appear to address concerns of a Safe Night Space.</p> <p>We would see Safe Night Space at James Street not being a long term solution and would have preferred to stay at the Rod Evans Centre in East Perth.</p>

DA-2023/5406 - Schedule of Submissions – 247-249 James Street, Northbridge

	<p>also taken up the initiative of investing heavily in new enterprises and improvements to existing properties. Let's return Northbridge to its former glory days of being a safe and enjoyable entertainment hub for all families.</p> <p>We believe that the City of Perth as well as the state government are doing their best to resolve the current situation. We urge you all to not provide a band aid situation to appease the public but to find a permanent solution elsewhere which will be agreeable and acceptable to all parties concerned. Northbridge is not the answer for the women escaping violence nor for business or families.</p>	
29	<p>I hope this letter finds you well. I am writing to express my concerns and objections regarding the proposed homeless shelter across from my business (address redacted) James Street, Northbridge. While I fully understand the importance of providing support and assistance to those in need, I believe that the chosen location for the shelter will have a negative impact on my business and the surrounding community.</p> <p>James Street used to be a lively street back then when I was a kid. However, things changed and the street has been seemingly quiet. My goal is to bring back the liveliness I've experienced back in the 90's and 2000's by uniting our community within the street. This has been quite evident in our offerings as a (business redacted) that's been making a name of itself on social media platform and has since garnered attention back to James Street with plenty of people walking down James Street.</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p>

DA-2023/5406 - Schedule of Submissions – 247-249 James Street, Northbridge

<p>My objections towards having the 24/7 Additional Use of Safe Night Space for Women within existing Community Centre are based on the following grounds:</p> <p>1. Impact on Foot Traffic and Customer Perception: The presence of a homeless shelter in close proximity to my (business redacted) is likely to deter potential customers (it already has by having RUAH opposite us and their clients pulling death (be it empty or not) threats on our patrons & staff members working (we've got video as evidence and this has been reported to RUAH itself). Many people may feel uncomfortable or unsafe, leading to a decline in foot traffic. This, in turn, could adversely affect my business and its reputation within the community that we've so desperately trying to rebuild the area.</p> <p>2. Safety Concerns: Unfortunately, the proximity of a homeless shelter may raise safety concerns for both customers and employees. Addressing these concerns is crucial to maintaining a secure and welcoming environment for everyone. We've all seen the plans released by RUAH however we've not seen it being incorporated 100% to it and it's been a concern ever since the establishment of this homeless shelter right across us (Best Western building).</p> <p>3. Potential for Loitering and Disorderly Behavior: Homeless shelters may attract individuals engaging in loitering or disorderly behavior, which could further contribute to an unwelcoming atmosphere for customers and residents alike.</p> <p>4. Property Value: The presence of a homeless shelter can potentially have a negative impact on property values in the area, affecting not only my business but also the investments of other local property owners.</p>	<p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
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DA-2023/5406 - Schedule of Submissions – 247-249 James Street, Northbridge

	<p>I acknowledge the importance of addressing homelessness in our community and support initiatives that provide assistance and resources to those in need. However, I urge the City of Perth Council to consider alternative locations that are less likely to disrupt local businesses and compromise the safety and well-being of the community.</p> <p>I kindly request the council to reconsider the proposed location and engage in further dialogue with local business owners to find a solution that is mutually beneficial for both the homeless population and the business community.</p>	
30	<p>I am the owner of a property opposite Ruah. I do empathise hugely with the plight of homeless people. I do believe help for them is needed.</p> <p>However, I think it is important that help be weighed against the interest of other members of society too. Being an owner and living in my property across from Ruah, I am witnessing shouting, screaming and more from across the street even during early hours of the morning. I am also the victim of a break in at my place. It was brutal. We could have lost our lives. And, since then, there have been so many other break ins in our estate. It was done with justification that they are forced into such a position to have to do it. I am sorry I don't know if that is right thinking. I wish when help is dished out, those who received it would make use of them with appreciation and consideration and thankfulness. Maybe education is needed here.</p> <p>So, whilst I empathise hugely with these people and help is needed for them, I think it must not be given at a location where and at expense of others who are compliant members of the community and paid a lot for their properties to have a home or a business. Surely, they</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women to rest overnight.</p> <p>The police vehicles constantly outside the premises on James Street is due to the police commandeering the parking spaces for their vehicles.</p>

DA-2023/5406 - Schedule of Submissions – 247-249 James Street, Northbridge

	<p>deserve to be looked after too. Therefore, I sincerely urge that Ruah be encouraged to look elsewhere which may be more appropriate especially given that Ruah has funding which I understand is not small. Taxpayers are helping in this way they deserve to live in safety and peace from all these social difficulties where there are alternatives. As taxpayers, they are already doing their share to help the vulnerables.</p> <p>With the police vehicles now parked outside Ruah every day, it speaks volume that trouble is anticipated to blow up anytime. I dare not even walk along the road outside where I live in case of being caught at the wrong place at the wrong time so close to my own home. After our break in, we have to lock all the windows and shutters and enclose ourselves in a space to feel more safe. Every noise we hear especially in the middle of the night from outside, we now would wake up to check. It has brought about so much anxiety. It is not right to have to live in fear. It is a horrible situation to be in. Please consider our welfare too and our contributions to the community.</p> <p>Kindly weigh out the interests of all parties fairly.</p>	
31	<p>I am writing to you at the COP to lodge my objection to the proposed changes at 247-249 James Street in Northbridge. I bought an investment property across the road at (address redacted) James Street which caters for short stay accommodation primarily for visitors to the city of Perth. The location, at the time of the property purchase, was a quieter part of Northbridge with al-fresco dining and coffee shops in the area that factored into the investment decision taken then. The location, P1 precinct in Northbridge, is meant to cater for entertainment, tourism & al-fresco dining celebrating the arts. Unfortunately, since the RUAH drop-in centre opened at 247-249 James Street, the location now experiences unruly and threatening</p>	<p>We refer to our previous comments in relation to the same issues raised in the submissions.</p> <p>This application is for the provision of a safe place for women, who are escaping family violence, to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p>

DA-2023/5406 - Schedule of Submissions – 247-249 James Street, Northbridge

	<p>behaviour which unfortunately impacts future business for leasing short stay accommodation. Some visitors/clients have already raised complaints and I note that there have been sporadic incidents at our building already as a result of the RUAH drop-in centre.</p> <p>With the latest new proposal for an overnight shelter at 247-249 James Street, the location will most likely evolve into a full-time homeless precinct going forward. This will have an adverse impact on future business as well as property valuations. I fully understand the need to address the chronic homeless situation but believe other more suitable locations, such as Wellington Street or the commercial area of East Perth, should be used instead. Placing a shelter in an entertainment precinct does not make sense.</p> <p>I therefore urge the City of Perth to reconsider their decision and look at more suitable alternatives.</p>	<p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p> <ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p>
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DA-2023/5406 - Schedule of Submissions – 247-249 James Street, Northbridge

		<p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
32	<p>After Ruah came into operations @ James Street, we have complaints and Reports from our Northbridge Managers, of people :</p> <ul style="list-style-type: none"> - Loitering and Loud swearing on the street; -Constant screaming and fighting; -Physical fights between RUAH clients; -Verbal and physical abuse of security guards; -Increased crime activity at this end of James Street -Having to clean human waste around Northbridge premises; -Facing constant threats; -RUAH clients with loud amplified music for trading purposes.etc. <p>Therefore, establishing what tantamount to a homeless precinct at James Street, would give the area a bad reputation severely impacting on the long term legacy of this area of NorthBridge. RAUH already presents a clear and present danger- commercially and physically.</p>	<p>This application is for the provision of a safe place for women to rest overnight.</p> <p>While the concerns raised in this submission are addressed in detail in the Management Plan, we have seen a decrease of 92% of anti-social behaviour complaints made to our Engagement Hub on James Street in 2023 compared to when this same service operated 210 meters away on Shenton Steet in 2022.</p> <p>In 2023, there were only 23 client incidents (representing anti-social behaviour complaints) at the Ruah Engagement Hub, of which 9 required police attendance. This is compared to the 2,211 offences in Northbridge during the same calendar year as reported on the WAPOL website (https://www.police.wa.gov.au/crime/crimestatistics#/).</p> <p>The 23 incidents were recorded at a rate of 2 to 3 incidents per month.</p> <p>Our Engagement Hub team manage all anti-social behaviour, complaints and incidents through our;</p>

DA-2023/5406 - Schedule of Submissions – 247-249 James Street, Northbridge

	<p>We therefore ask the relevant Authority to look at this seriously and STOP it, so as not to kill this part of peaceful and safe Northbridge, St. James Street.</p>	<ul style="list-style-type: none"> • Complaints Management Policy & Procedure • Client Incident Management Policy & Procedure • Ruah and Security Risk & Safety Work Instruction • Client Rights & Responsibilities • Aggressive Behaviour Guidelines • Clinical Governance Framework • Mandatory Management of Aggression and De-escalation training for all staff <p>We have not been notified by any authority that we are in breach of our Management Plan and we have and will continue to work closely with the City of Perth Rangers, City of Perth Administration Team, Emergency Services and our Neighbours to promptly respond to issues when we are notified.</p> <p>We maintain positive relationships with neighbouring businesses, some of which have extended their hours and donate food.</p> <p>We provide services in Northbridge because this is where the need is. We know this as we use the main database that tracks volume and location of people experiencing homelessness.</p> <p>Extensive efforts have been made to explore other locations but have been rejected by many local councils.</p> <p>Contrary to fears of a negative impact on the Northbridge Community, Ruah has many supporters in the area, ranging from community members to arts and events organisations, who view our services as part of the solution.</p>
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Planning and Development Act 2005
City of Perth

Notice of Determination on Application for Development Approval

Application Ref No. **DA-2023/5406**
Location: **247-249 James Street, NORTHBRIDGE**
Lot: **Y 112** Plan/Diagram: **DP223022**
Vol. No: **2017** Folio No: **937**
Application date: **7 December 2023** Received on: **11 December 2023**

Description of proposed development: ***Temporary Safe Night Space for Women (Community Centre)***

The application for development approval is ***APPROVED by the Council at its meeting held on 27 February 2024*** in accordance with the provisions of City Planning Scheme No. 2 and the Metropolitan Region Scheme subject to the following conditions:

- 1. The Safe Night Space for Women only operating from 7:00pm to 7:00am seven days a week.***
- 2. The Safe Night Space for Women having a limited approval period of 30 months from the date of this determination, after which time the use must cease to the satisfaction of the City.***
- 3. Prior to the commencement of the Safe Night Space, an updated Operational Management Plan, that includes:***
 - a. a provision to require the presence of one (1) security personnel to be positioned external to the building at all times that the Safe Night Space is operational; and***
 - b. specific provisions to engage with the Northbridge Neighbourhood Group on a regular basis to discuss any potential issues relating to the operation of the Safe Night Space and measures to resolve these issues***

must be submitted to and approved by the City. The Safe Night Space being managed and operated in accordance with the approved Operational Management Plan at all times to the satisfaction of the City.

4. Prior to the commencement of the Safe Night Space, an updated Waste Management Plan shall be submitted to and approved by the City providing the following:

- a. Specify what measures are being taken to mitigate the disposal of illegal items.**
- b. Specify what measures are being taken to mitigate biohazard items.**

with the approved Waste Management Plan being implemented at all times by the operator/manager, to the satisfaction of the City.

Date of determination: **27 February 2024**

Note 1: If the development the subject of this approval is not substantially commenced within a period of two (2) years, or another period specified in the approval after the date of determination, the approval will lapse and be of no further effect.

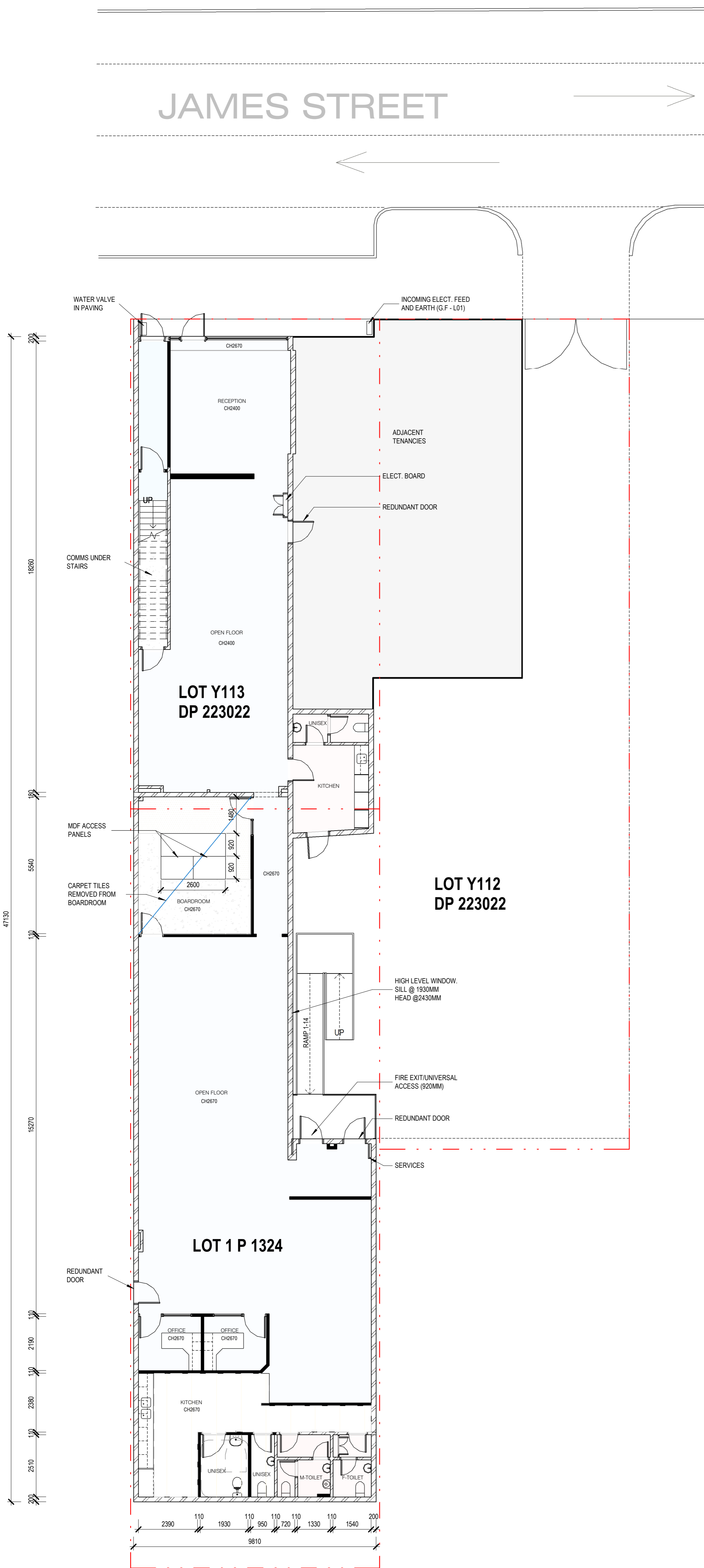
Note 2: Where an approval has so lapsed, no development must be carried out without the further approval of the City having first been sought and obtained.

Note 3: If an applicant or owner is aggrieved by this determination an application may be made in writing to the Council to revoke or amend this planning approval and there is a right of review by the State Administrative Tribunal in accordance with the Planning and Development Act 2005 Part 14. An application must be made within 28 days of the determination.

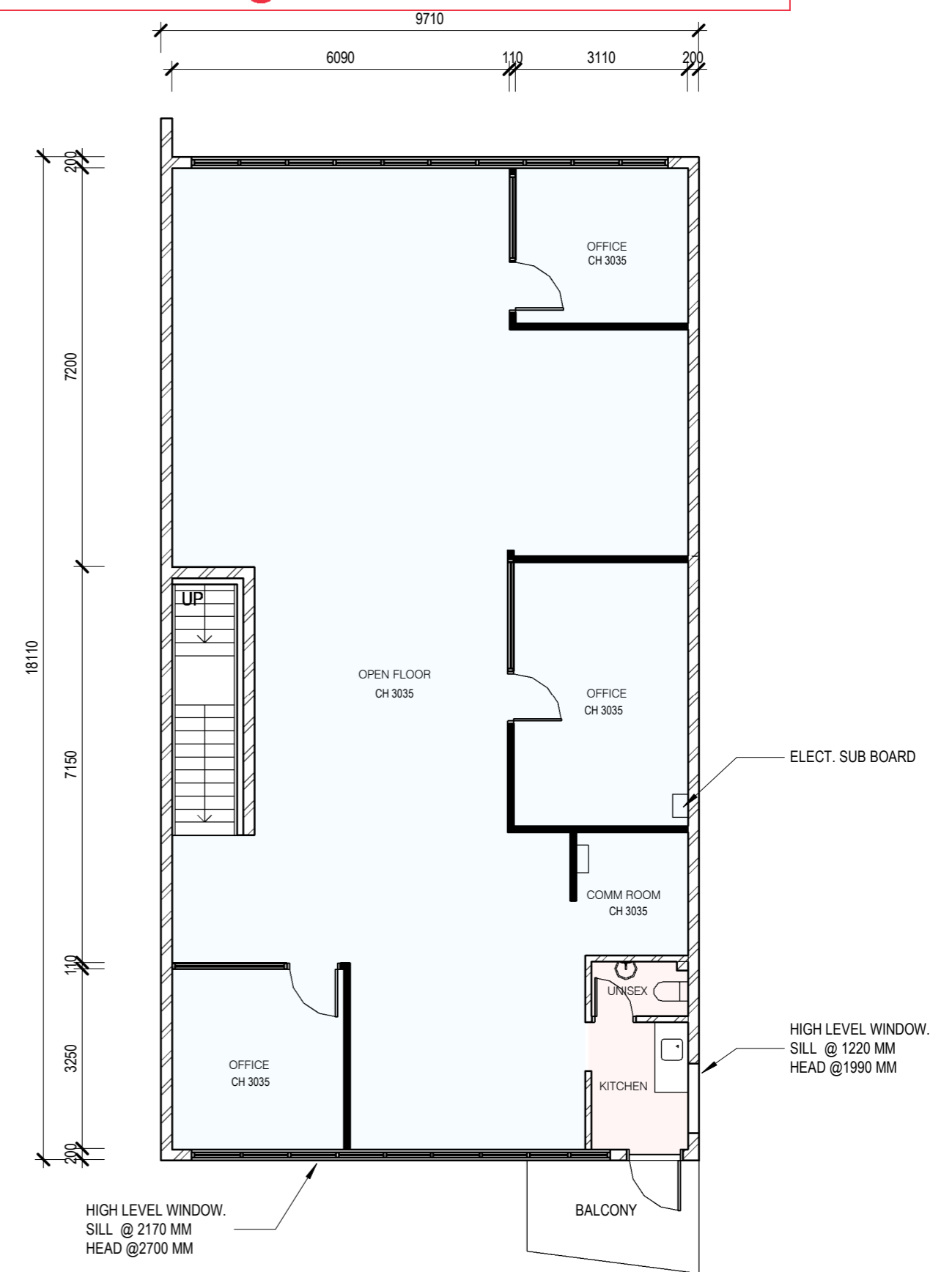
6 March 2024



ROBERTO COLALILLO
ACTING ALLIANCE MANAGER DEVELOPMENT APPROVALS
For and on behalf of the City of Perth



1 GROUND FLOOR
SCALE: 1 : 100



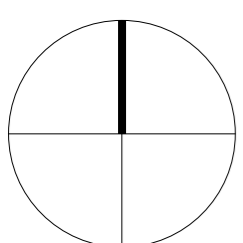
2 LEVEL 01
SCALE: 1 : 100

LEGEND

- LOT BOUNDARY
- ADJACENT TENDENCIES
- WALL TYPES
 - ▨ BRICKWORK
 - ▬ PLASTERBOARD
- FLOOR TREATMENT
 - CARPET
 - TILE
 - VINYL
 - CONCRETE
 - MDF

	G.F.A (M2*)	N.L.A (M2*)
GROUND FLOOR	335	267
LEVEL 01	154	149
TOTAL	489	416

*NOTE THESE AREAS ARE APPROXIMATE ONLY



State Administrative Tribunal

Address: 565 Hay St PERTH WA 6000
PO Box: GPO Box U1991 PERTH WA 6845
Website: www.sat.justice.wa.gov.au
Phone: (08) 9219 3111
Toll Free: 1300 306 017
Fax: (08) 9325 5099

Matter Number:

DR/33/2024

Date Lodged:

6 Mar 2024

Planning & Development Act 2005 - Application - Class 2

APPLICATION DETAILS

Act	Planning and Development Act 2005
Section	Section 252(1) - Review of a decision to refuse or conditionally grant an application under a planning scheme
Application Type	Class 2

REQUIRED SUPPORTING DOCUMENTS

<u>Attachment 1</u>	
Upload file	Letter to City of Perth from PTS Town Planning - 11.12.23.pdf
<u>Attachment 2</u>	
Upload file	Application for Development Approval - local planning scheme - 8.12.23.pdf
<u>Attachment 3</u>	
Upload file	Application for Planning Approval - Metropolitan Region Scheme - 8.12.23.pdf
<u>Attachment 4</u>	
Upload file	Floor plans - 10.2.22.pdf
<u>Attachment 5</u>	
Upload file	Title documents (referred to in letter of 11.12.23 as 'the Certificates of title').pdf
<u>Attachment 6</u>	
Upload file	Operational Management Plan as lodged.pdf
<u>Attachment 7</u>	
Upload file	Minutes - 27.2.24.pdf

APPLICANT/S DETAILS

<u>Applicant 1</u>	
Is the applicant an individual or an organisation?	An organisation
Organisation name	Name: RUAH COMMUNITY SERVICES LTD ABN: 98065787 ACN: 065827787
What is the applicant's email address and contact number?	Email address: debra.zanella@ruah.org.au Mobile: 0408637200 Phone: -
What is the applicant's address?	Address: 255 Hay Street Suburb: SUBIACO Postcode: 6008 State: WA

	Country: Australia
Contact person	Ms Debra Zanella
Is a lawyer acting for, or other representative assisting the applicant in this proceeding?	Yes, a lawyer
Please enter the law firm name	Flint Legal
Address	Address: PO Box 7187 Suburb: KARAWARA Postcode: 6152 State: WA Country: Australia
Contact details	Email address: martin@flintlegal.com.au Phone: 9313 1612
Reference number (if applicable)	24-012

DETAILS OF REVIEWABLE DECISION (THE RESPONDENT)

When was the decision made?	27 February 2024
Who made the decision?	Name: CITY OF PERTH ABN: 83780118628 ACN: -
Contact details	Email address: info@cityofperth.wa.gov.au Mobile: - Phone: (08) 9461 3333
Address	Address: Council House, 27 St Georges Terrace Suburb: PERTH Postcode: 6000 State: WA Country: Australia

ADDRESS DETAILS

Address of property	Address: 247-249 James Street Suburb: NORTHBRIDGE Postcode: 6003 State: WA Country: Australia
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DEVELOPMENT INFORMATION

What is the value of the development?	Nil
What is the proposed number of lots?	N/A
Do you, with the agreement of each other party, wish to elect that this application be determined by one Member of SAT?	Yes

ORDERS SOUGHT AND GROUNDS

What order(s) do you want SAT to make?	Upload file: Background, orders sought, grounds of review, and related documents.pdf
Why should the order(s) be made?	Provide details: See attached document titled 'Background, orders sought, grounds of review and related documents'.

HEARING DETAILS

Select hearing details	Hearing Date: 22 March 2024 Hearing Time: 11:30am Hearing Location: State Administrative Tribunal Building 565 Hay Street, PERTH WA 6000, Australia
<p>The first step is to hold a directions hearing to establish how the matter will be dealt with by SAT; whether it involves any particular questions of law; whether it is capable of resolution through mediation and how it will be listed for hearing.</p> <p>The Applicant(s) and Respondent(s) detailed in this application will be required to attend. If a party does not attend, the issue in dispute may be resolved by SAT in their absence on the evidence put before it.</p> <p>Your hearing room will be displayed on the display boards located on the ground floor.</p> <p>If you require or have questions relating to any of the following services please contact SAT on (08) 9219 3111:</p> <ul style="list-style-type: none"> • Teleconferencing; • Videoconferencing; • An interpreter; • Special accessibility requirements (for example, wheelchair access or a hearing loop). 	

APPLICATION SUMMARY AND DECLARATION	
Name of person lodging application	Surname: FLINT Given name/s: Martin John
Declarations	<input checked="" type="checkbox"/> I confirm that the details provided in this application are true and correct and I understand that it is an offence under section 98 of the State Administrative Tribunal Act 2004 (WA) to knowingly give false or misleading information to the State Administrative Tribunal. <input checked="" type="checkbox"/> I understand that I am required to give a copy of this application to each other party, and any person entitled to be given a copy under the Act or enabling Act, not more than seven (7) days after successful lodgment.

Our Ref: J000470

11 December 2023

Ms Julia Kingsbury
Development Approvals
City of Perth
GPO Box C120
PERTH WA 6839



TOWN
PLANNING

PO Box 538, Inglewood
Western Australia 6932

0411 445 031
peter@ptsplanning.com.au

www.ptsplanning.com.au

Dear Julia

ABN - 32 603 168 850

247-249 (PERTH TOWN LOT Y113, LOT 1 AND Y112) JAMES STREET, NORTHBRIDGE – SAFE NIGHT SPACE FOR WOMEN

PTS Town Planning Pty Ltd is pleased to submit this application for the use of the building temporarily as a safe night space for women.

In accordance with the City of Perth's requirements please find enclosed:

- A completed City of Perth Application Form.
- A completed MRS Form 1.
- Executed landowner authorization.
- A copy of the site and floor plan.
- A copy of the Certificates of title.
- Operational Management Plan.

Subject Site

The subject site is Perth Town Lot Y113 and Lot 1 (247) James Street, Northbridge contained on Certificate of Title Volume 1106 Folio 252. The land is owned by Sawasdee Pty Ltd.

We have also included Lot Y112 contained on Certificate of Title Volume 1106 Folio 252 as this lot is used for car parking and waste storage. There is no change to the building or use on Lot Y112. The land is also owned by Sawasdee Pty Ltd.

The site is not located within a bushfire prone area.

The site is not heritage listed.

The site is zoned City Centre under the Metropolitan Region Scheme (MRS).

The site is in the City Centre use area under City Planning Scheme No. 2 (CPS2) and located within the Northbridge Precinct (P1).

Background

The Minister for Planning on 21 September 2022 under sections 246 and 247 of the *Planning and Development Act 2005* approved the use of the subject site for a Community Centre. The community centre is used by Ruah for its Engagement Hub which assists people experiencing homelessness to rest, refresh and access specialist support services. This is a permanent use approval of the building.

The Minister's approval was subject to 8 conditions including Condition 3 which limited the hours of operation from 8:30am to 2pm Monday to Friday, Condition 4 which required a Business Management Plan, Condition 6 relating to external lighting, Condition 7 requiring a waste management plan and Condition 8 in relation to signage. The conditions were cleared, and the Ruah Engagement Hub has been operating on the site.

With respect to the safe night space for women, we note that the City of Perth provided the Rod Evans Community Centre in East Perth for Ruah to operate the Safe Night Space for Women from the site for the last 2 and a half years (finished on 30 November 2023). We understand that the City considered that the Safe Night Space for Women fell within the use of the Rod Evans Community Centre as a community centre.

We also note that the City of Perth prepared an amendment to CPS2 to provide Community and Cultural as a contemplated use rather than the current preferred use. The amendment was not approval by the Minister.

Proposed Application

The proposed development does not involve any external works and any internal works are exempt under Clause 61(1)(a) of the Deemed Provisions. We note that no internal works are currently proposed.

The application seeks to change the parameters of the approved community centre to enable the use of the building as a safe night space for women. The safe night space for women is seeking a temporary 30 month approval. The temporary approval is proposed given that new facilities and services will come online within this period meaning that the service will likely no longer be required from the subject site.

The Ruah Engagement Hub will continue to operate on the site between 8:30am and 2pm Monday to Friday. The Engagement Hub is a permanent use of the building.

The safe night space for women will operate between the hours of 7pm and 7am seven days a week (staff will be on site from 6:30pm to 7:30am). The Safe Night Space is a place where women can rest and connect to support services. The safe night space does not provide beds and the people using the space have access to basic services (laundry, toilets and a shower).

The service will have the capacity to support 30 women with two staff and 2 security persons. As identified in the City of Perth Agenda dated 28 February 2023 *'Over the twenty months from 31 May 2021 to 31 January 2023, the Safe Night Space has sheltered 709 individuals for a cumulative 7,966 instances of support (calculated by number of women multiplied by the number of nights each woman has stayed at the SNS). Although the capacity of the service is 25 women, averaged over the 611 days of this period, this equates to 13 women per night.'*

Planning Assessment

Land Use

The Minister for Planning on 21 September 2022 under sections 246 and 247 of the *Planning and Development Act 2005* approved the use of the subject site for a Community Centre (Ruah Engagement Hub).

We do not propose to repeat the consideration of the Minister with respect to the land use, however, we refer to the Minister's Decision in paragraphs 69 to 106 and that the proposed safe night space for women falls within the current approved use of community centre and 'Community and Cultural' use group category.

We understand that the City of Perth considers the use for the safe night space for women falls within the definition of a community centre as it provided the use of the Rod Evans Community Centre for the safe night space for women for the last 2 and a half years.

There is no change to the approved land use (community centre). This application is seeking to change the parameters of the use to accommodate the safe night space for women.

Community and Cultural is a 'P' preferred use under CPS2. Clause 32 of CPS2 identifies that:

'Where, in a precinct, a use group category is classified as a preferred use then, in considering an application involving a use from that category in that precinct, the local government -

(b) cannot otherwise refuse the application by reference to the proposal to begin or continue the preferred use.'

We note that the City of Perth Officers in the original assessment of the engagement hub and the Minister concurred that the application cannot be refused on planning grounds. We refer to paragraphs 115 to 122 of the Minister's Decision.

Management Plan

We have enclosed the operational management plan for the safe night space for women. Specifically, the management plan addresses matters previously raised by the City of Perth and the Minister with respect to the current engagement hub, including:

- The control of noise and other disturbances on the site that are associated with the activities or customers on site.
- The removal of unwanted or unattended personal belongings of customers of the site within the verge and footpath areas, directly in front of the property.
- Managing the congregation and queuing of customers outside the property.
- Establishing and maintaining a complaints management service, that enables and facilitates easy access (by the community) during the hours of operation to a designated contact person(s).

Car Parking

There is no change to the car parking on site as a result of this application and we note under the Perth Parking Policy there is no minimum requirement.

Waste Management

As part of the approval conditions for the Engagement Hub, a Waste Management Plan was required to be prepared. The WMP has been prepared and approved. The WMP identifies the waste demand based on floor area. As the floor area is not changing there is no need to amend the WMP.

Planning and Development (Local Planning Schemes) Regulations 2015

As identified above, we note that the Applicant, City of Perth Officers (as part of the original Engagement Hub assessment) and the Minister (as part of the original Engagement Hub assessment) concurred that the application cannot be refused on planning grounds.

Clause 67(2) provides matters to be given due regard in consideration of applications. We have addressed those matters relevant to the application.

The aims and provisions of this Scheme and any other local planning scheme operating within the Scheme area.

While it was identified previously that the aims of CPS2 are high level and not considered to have a strong or clear link to the proposal, Clause 6 of CPS 2 provides 'objectives and intentions of the Scheme'. Subclause (3)(a) - (c) identifies:

- a) *to recognise and reinforce the role of Perth as the capital of Western Australia and the administrative, financial and political centre of the State;*
- b) *to cater for the diversity of demands, interests and lifestyles by facilitating and encouraging the provision of a wide range of choices in housing, business, employment, education, leisure, visitor accommodation and attractions, transport and access opportunities;*
- c) *protect and enhance the health, safety and general welfare of the local government's inhabitants and the social, physical and cultural environment of the local government.*

The services provided by the safe night space for women are consistent with the objectives above as Northbridge forms part of Perth's Capital City, where people naturally congregate. The safe night space for women meets the diversity of demands as the service assists vulnerable people enhancing the safety and general welfare of the entire locality.

The Statement of Intent for Northbridge identifies:

The Northbridge Precinct will continue to evolve as a diverse, interesting and dynamic inner-city precinct and will be promoted as an attractive destination for the local population and interstate and overseas visitors. This Precinct will remain Perth's primary entertainment and night life area and provide a variety of residential and visitor accommodation and commercial services. It will be a unique area in terms of uses and character and the social and cultural diversity that clearly distinguishes the Precinct will be fostered.

The community centre currently exists and therefore forms part of the existing locality and existing service provision in the precinct.

The safe night space for women provides for a diverse, interesting and dynamic inner-city precinct in that the use provides an important community service in the area. The proposal provides an important social service by reducing the social problems linked with domestic violence.

The objectives contained in the City's planning framework cater for a diversity of demands and the enhancement of health and safety. This includes a range of social and cultural facilities and services. Schedule 3 of CPS 2 contemplates a range of entertainment, educational, healthcare, and community and cultural uses within the Northbridge Precinct. The Northbridge Precinct Plan seeks to locate compatible non-residential uses, such as 'community activities,' west of Milligan, Shenton and Palmerston streets.

Any policy of the State.

On 22 July 2020, the State Government launched a strategy to reduce family and domestic violence. *Path to Safety: Western Australia's Strategy to Reduce Family and Domestic Violence 2020-2030* sets out a whole-of-government and community plan for reducing and responding to this issue over the next decade.

This policy clearly seeks to act now to keep people safe including support and services for people experiencing domestic violence.

Any local planning strategy for this Scheme endorsed by the Commission.

The vision of the City of Perth Local Planning Strategy May 2023 is "A liveable, sustainable and prosperous city — this is our aspiration for Perth. We want our community to be as safe as possible, to be inclusive, active, vibrant and connected. We want to live in a healthy environment and we all want to be part of an economically successful, flourishing and thriving city." (Underline added)

Under Safe and Inclusive, the strategy identifies that 'Cities which offer safe environments and varied services and activities to a range of people across many demographics and cultures are successful in creating places where people of all walks of life choose to be.'

Other than the above, the Strategy provides little guidance in how the vision relevant to the provision of social services will be considered or delivered.

The compatibility of the development with its setting, including —

- (i) the compatibility of the development with the desired future character of its setting; and*
- (ii) the relationship of the development to development on adjoining land or on other land in the locality including, but not limited to, the likely effect of the height, bulk, scale, orientation and appearance of the development.*

The application does not propose any external alterations and therefore (ii) above is not relevant to the consideration of the application.

In terms of the compatibility of the development with the desired future character of its setting we note that the community centre is existing. The surrounding locality is characterised by a mix of land uses which includes the community centre, short stay and long stay dwellings, commercial uses and the Police Station. This also includes services that operate 24 hours a day.

The proposed safe night space for women is compatible with its surrounds, having regard to the established character of the locality. We also note that the approval is for the temporary use of the safe night space for 30 months.

The amenity of the locality including the following —

- (i) environmental impacts of the development;*
- (ii) the character of the locality;*
- (iii) social impacts of the development;*

We note that the community centre is existing in the locality and that there are a number of other service providers located nearby and form part of the existing character and amenity of the area (eg YouthLink WA, The Deen Clinic, Hepatitis WA, Sexual Health Quarters and Womens Health and Family Services).

Community services form an integral part of the fabric that underpins the amenity of the area surrounding the proposed site. This is reflected in the City's planning framework. The safe night space for women will be carefully managed in accordance with the operational management plan and will not detract to any significant degree from the present amenity of the area.

The existing centre is 50 metres from the Perth Police Station and therefore any impacts to public safety or antisocial behaviour can be addressed promptly.

As part of this application, we have enclosed an operational management plan that addresses:

- The control of noise and other disturbances on the site that are associated with the activities or customers on site.
- The removal of unwanted or unattended personal belongings of customers of the site within the verge and footpath areas, directly in front of the property.
- Managing the congregation and queuing of customers outside the property.
- Establishing and maintaining a complaints' management service, that enables and facilitates easy access (by the community) during the hours of operation to a designated contact person(s).

The safe night space for women will not significantly impact the existing amenity of the locality and the amenity concerns can be effectively managed.

The amount of traffic likely to be generated by the development, particularly in relation to the capacity of the road system in the locality and the probable effect on traffic flow and safety;

There is no change to the amount car parking provided on site and any increase in traffic will be negligible.

The availability and adequacy for the development of the following —

- (i) public transport services;*
- (ii) public utility services;*
- (iii) storage, management and collection of waste;*
- (iv) access for pedestrians and cyclists (including end of trip storage, toilet and shower facilities);*
- (v) access by older people and people with disability;*

The site has good access to public transport and access for pedestrians. A waste management plan has been prepared for the community centre.

The history of the site where the development is to be located.

The site is approved as a community centre. This application seeks to amend the parameters of the approved use to enable the safe night space for women for a temporary period of 30 months.

The impact of the development on the community as a whole notwithstanding the impact of the development on particular individuals.

In the Minister's Decision it was identified that *'Senior Member, Dr Stephen Willey in Planning and Environmental Law in Western Australia 2Q2V) at page 368 that clause 67(2)(x) of the deemed provisions likely includes questions of 'need' for a particular land use particularly where the use is for the public benefit. Dr Willey goes further to explain at page 370 that there are cases where a community or public need overrides considerations as to loss of amenity of the locality caused by a proposed development. This was the case of Pinder Architects Pty Ltd v City of Stirling [No 1] (1995) 15 SR (WA) 13. The TPAT was satisfied that there was a public need for the development, a hostel for Aboriginal patients from regional locations in order for them to receive medical treatment in Perth. Therefore, the TPAT approved the development, finding that the public need for the medical facility outweighed the possible local amenity impacts for nearby neighbours, including noise and impacts on property values.*

There is no doubt that there is a need for the service. This is acknowledged by the City of Perth, the State Government, and the community.

Conclusion

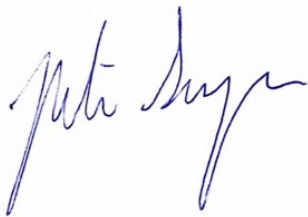
This application seeks to amend the parameters of the approved community centre to cater, on a temporary basis for 30 months, for the safe night space for women.

We look forward to your approval of this application. We note the previous commentary that the under CPS2 the application cannot be refused and the only matter for consideration is any conditions to be applied to the approval.

Should you have any questions or require any additional information, please do not hesitate to contact the undersigned on 0411 445 031 or peter@ptsplanning.com.au.

Yours sincerely

PTS Town Planning Pty Ltd



Peter Simpson
Director

📍 Council House, 27 St Georges Terrace, Perth
✉ GPO Box C120, Perth WA 6839
☎ (08) 9461 3352
@ planning@cityofperth.wa.gov.au
🌐 www.perth.wa.gov.au
ABN 83 780 118 628



**CITY OF
PERTH**

Application for Development Approval

Planning and Development (Local Planning Scheme) Regulations 2015

Instructions: Please complete in full.

Note that two (2) separate application forms are required to be submitted for any Development Approval. In addition to this form, please obtain the up-to-date MRS Form 1 (Metropolitan Region Scheme) from the web at: [MRS Form 1 Application Form](#)

1. Owner Details

Full Name(s) (all owners)

Sawasdee Pty Ltd

ABN (if applicable)

78 782 561 064

Contact person for correspondence:

Address

Level 8, Golden Square, 32 St Georges Terrace, Perth

State

WA

Postcode

6000

Mobile

0411 880 721

Telephone (business)

Email

somkiatchanlong@gmail.com

Owners
Signature *[Handwritten Signature]*

Date
(DDMMYYYY)

07.12.2023

Owners
Signature *[Handwritten Signature]*

Date
(DDMMYYYY)

07.12.2023

The signature of the owner(s) is required on all applications. This application will not proceed without their signature. For the purposes of signing this application an owner includes the persons referred to in the Planning and Development (Local Planning Schemes) Regulations 2015 Schedule 2 clause 62(2).

2. Applicant Details (if different from owner)

Full Name

PTS Town Planning Pty Ltd

Contact person for correspondence:

Peter Simpson

Address

PO Box 538 Inglewood

State

WA

Postcode

6932

Mobile

0411 445 031

Telephone (business)

0411 445 031

Email

peter@ptsplanning.com.au

By ticking this box, I confirm that;

I, the applicant have obtained permission from the author and/or relevant right holders to reproduce, publish and distribute all documents and plans submitted for the purpose of my application.

I fully indemnify the City for any alleged breach of copyright relating to the documents submitted as a result of them being reproduced/published/distributed by the City in processing my application.

I consent to the application and accompanying material being subject to public advertising if required

Signature *[Handwritten Signature]*

Date
(DDMMYYYY)

8/12/23

3. Property Details

Street Number and Name

247 James Street, Northbridge

Lot No:

Lot Y113, Lot 1 and Y112

Location No:

Diagram or Plan No:

223022

Certificate of Title Vol. No:

1106/2017

Folio:

252/937

Suburb:

Northbridge

Nearest Street Intersection:

Fitzgerald Street

4. Proposed Development

Nature of Development:

- Works
- Demolition
- Change of Use (change to the parameters of the approved community centre and its hours of operation)
- Signage
- Works and Use

Is an exemption from development claimed for part of the development?

If yes, please detail what the exemption is for (if relevant)

Internal alterations

Description of proposed works and/or use:

Community centre - Ruah Engagement Hub (permanent) and Safe Night Space (approval for 30 months)

Nature of any existing buildings and/or land use

Community Centre (Ruah Engagement Hub)

Approximate cost of proposed development

\$0

Estimated time of completion (MM/YYYY)

4 months

5. Additional Information for Development Approval for Advertisements (Signs)

Note: To be completed in addition to the application for Development Approval form

Description of property on which advertisement is to be displayed including full details of its proposed position within the property:

Number of Signs

Note: Please complete the below for every sign proposed

Details of Proposed Sign:

Type of structure on which advertisement is to be erected (i.e. freestanding, wallmounted, other):

Height

Width

Depth

--	--	--

Colours to be used:

Materials to be used:

Height above ground level:

To top of advertisement:

To underside:

If the sign is illuminated, please state whether steady, moving, flashing, alternating, digital, animated, or scintillating and state intensity of light source:

Period of time for which advertisement is required:

Details of signs (if any) to be removed if this application is approved:

Note:

This application should be supported by a photograph or photographs of the premises showing superimposed thereon the proposed position for the advertisement and those advertisements to be removed as detailed above.

6. Lodgement Options

Online - Preferred

Please refer to [eLodgement | City of Perth](#)

To be set up as a registered user, please email planning@cityofperth.wa.gov.au

In Person

City of Perth
Customer Service Counter
Ground Floor, 27 St Georges Terrace, PERTH

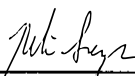
By Post

Development Approvals Unit
City of Perth, GPO Box C120
PERTH WA 6839

Office Hours - Monday to Friday 8.30am to 4.30pm (Except Public Holidays)

7. Customer Authorisation

- By ticking this box, I confirm I understand that this form authorises the City of Perth to reproduce any documents associated with this application for internal purposes only.
- By ticking this box, I confirm I have read and agree to abide by the associated Terms and Conditions. I also confirm the information I have provided in this form is accurate. (A signature is not required on forms lodged electronically and submissions will be treated in accordance with the Electronic Transactions Act 2011 (WA).)

Signature 
(for hardcopy submission only)

Date
(DDMMYYYY)

This form is available in alternative languages and formats on request

8. Minor Development and Signs Application Checklist

Applicant declaration

- I understand that The City may require additional information to be provided before determining the application.
 - I understand that failure on my part to provide the required information specified in the checklist can result in the City not accepting my application.
 - I understand that documents that are required to be advertised under the provisions of *City of Perth City Planning Scheme No.2*, *City of Subiaco Town Planning Scheme No.4 (applicable to Crawley and Nedlands, transferred 1 July 2016)* and *City of Nedlands Town Planning Scheme No.2 (applicable to Nedlands, transferred 1 July 2016)* may be made publicly available and may be displayed on The City's website.
- Completed Application for Development Approval (Local Planning Scheme)
- The form must be signed by the owner(s). An owner who is:
 - (a) If the land is freehold land –
 - (i) a person whose name is registered as a proprietor of the land
 - (ii) the State, if registered as a proprietor of the land
 - (iii) a person who holds an interest as purchaser under a contract to purchase an estate in fee simple in the land;
 - (iv) a person who is the holder of a freehold interest in land vested in an executor or administrator under the *Administration Act 1903* section 8;
 - (b) If the land is Crown land –
 - (i) The state
 - (ii) A person who holds an interest as purchaser under a contract to purchase an estate in fee simple in the land;
 - In the instance where a company is the owner an authorised person must sign and state their position
 - Strata managers/organisations/authorised agents must attach an authorisation letter or affix their seal as well as a copy of the Body Corporate minutes
- Completed MRS Form 1 (Metropolitan Region Scheme)
Available at: [MRS Form 1 Application Form](#)
- Certificate of Title for every lot (no older than 6 months.)
- Digital copy of all development plans & location plan in PDF Format and to Scale

9. Accompanying Information checklists for your Application type:

Minor Development Application (Alterations & Additions)

- Site plan
- Design and Elevations

- Sign type application form
- Site plan/ Tenancy location plan
- Sign images
- Elevation plan(s)
- Details regarding illumination (if applicable)
- Written Submission – see information kit

Change of Use Application or Minor Demolition Works

- Site Plan
- Floor Plan
- Written Submission – see information kit
- Where changing to an entertainment use – Acoustic Report is required

Minor Earth Works

- Excavation proposal
- Site Plan
- Written Submission – see information kit

10. Major Development Application Checklist

Applicant declaration

- I understand that The City may require additional information before determining the application.
 - I understand that failure on my part to provide the required information specified in the checklist can result in the City not accepting my application.
 - I understand that documents that are required to be advertised under the provisions of *City of Perth City Planning Scheme No.2*, *City of Subiaco Town Planning Scheme No.4* (applicable to Crawley and Nedlands, transferred 1 July 2016) and *City of Nedlands Town Planning Scheme No.2* (applicable to Nedlands, transferred 1 July 2016) may be made publicly available and may be displayed on The City's website.
 - I understand and acknowledge that all submitted documentation including digital 3D models may be subject to the Freedom of Information act 1982.
- Completed Application for Development Approval (Local Planning Scheme)
- The form must be signed by the owner(s). An owner who is:
 - (c) If the land is freehold land –
 - (v) a person whose name is registered as a proprietor of the land
 - (vi) the State, if registered as a proprietor of the land
 - (vii) a person who holds an interest as purchaser under a contract to purchase an estate in fee simple in the land;
 - (viii) a person who is the holder of a freehold interest in land vested in an executor or administrator under the *Administration Act 1903* section 8;
 - (d) If the land is Crown land –
 - (iii) The state
 - (iv) A person who holds an interest as purchaser under a contract to purchase an estate in fee simple in the land;
 - In the instance where a company is the owner an authorised person must sign and state their position
 - Strata managers/organisations/authorised agents must attach an authorisation letter or affix their seal as well as a copy of the Body Corporate minutes
- Completed MRS Form 1 (Metropolitan Region Scheme)
Available at: [MRS Form 1 Application Form](#)
- Certificate of Title for every lot (no older than 6 months.)
- Digital copy of all plans and documents (CD-ROM / DVD ROM/USB)
- Plans / Drawings / Photographs
- Statement of Planning Compliance
- Technical Reports
- 3D Digital Model

If you are applying for a Development Assessment Panel application, please also include the following information.

- Development Application (see above checklist)
- Completed DAP Form 1
- Certificate of Title for every lot (no older than 6 months.)
- Digital copy of all plans and documents (CD-ROM / DVD ROM/USB)
- Plans / Drawings / Photographs
- Statement of Planning Compliance
- Technical Reports
- 3D Digital Model

Applicants are strongly encouraged to liaise with the Development Approvals planning team prior to lodging a DAP application. Please contact the Development Approval Unit on 9461 3352.



MRS

Form 1 Application for Planning Approval

Owner/s details

Registered proprietor/s (landowner/s) or the authorised agent's details **must** be provided in this section. If there are more than two landowners please provide all relevant information on a separate page. Signature/s must be provided by all registered proprietors or by an authorised agent. **Alternatively**, a letter of consent, which is signed by all registered proprietors or by the authorised agent, can be provided.

Full name	Sawasdee Pty Ltd		
Company/agency (if applicable)			
ACN/ABN (if applicable)	78 782 561 064		
Postal address	Level 8, Golden Square, 32 St Georges Terrace		
Town/suburb	Perth	Postcode	6000
Signature	The landowner/s or authorised agent consents to the applicant submitting this application		Date
			07.12.23
Print name and position (if signing on behalf of a company or agency)	SOMKIAT CHANLONGSIRICHAJ		DIRECTOR

Applicant details

Name/company	PTS Town Planning Pty Ltd		
Contact person	Peter Simpson		
Postal address	PO Box 538		
Town/suburb	Inglewood	Postcode	6932
Phone	0411 445 031	Email	peter@ptsplanning.com.au
Applicant signature			Date
Print name and position (if signing on behalf of a company or agency)	Peter Simpson - Director		8/12/23

Property details

Certificate of title description of land:	Lot No	Y113 and 1	Location No	
Plan or diagram	Vol	1106	Folio	252
Certificate of title description of land:	Lot No	Y112	Location No	
Plan or diagram	Vol	2017	Folio	937
Title encumbrances (e.g. easements, restrictive covenants)	Nil			
Locality of development (house no., street name, suburb, etc)	247-249 James Street, Northbridge			
Nearest street intersection	Fitzgerald Street			
Existing building/land use	Two Storey Community Centre (Engagement Hub)			
Description of proposed development and/or use	Community centre - Ruah Engagement Hub (permanent) and Safe Night Space (approval for 30 months)			
Nature of any existing buildings and/or use	Community Centre (Ruah Engagement Hub)			
Approximate cost of proposed development (excl. gst) \$	0			
Estimated time of completion	4 months			

Office use only

Acceptance officer's Initials	<input type="text"/>	Date received	<input type="text"/>
Local government reference No.	<input type="text"/>	Commission reference No.	<input type="text"/>

The information and plans provided with this application may be made available by the WAPC for public viewing in connection with the application.

Additional Information to be provided on the MRS Form 1

Is the development within a designated Bushfire Prone Area? Yes No

If 'yes', have bushfire hazard issues been identified and addressed (e.g. by providing a BAL Assessment(s) or BAL Contour Map and a Bushfire Management Plan with the application)? Yes No
 N/A

If NA is selected and the development is in a designated bushfire prone area then a short statement justifying why SPP 3.7 does not apply should be included.

Does your application require determination by a Development Assessment Panel? (DAP) Yes No

Please refer to the following website for DAP requirements: www.dplh.wa.gov.au/daps

If yes, please complete DAP Application Form as per DAP requirements.

Checklist (supporting information)

Please complete the checklist below and ensure that all the relevant information is provided with the application.

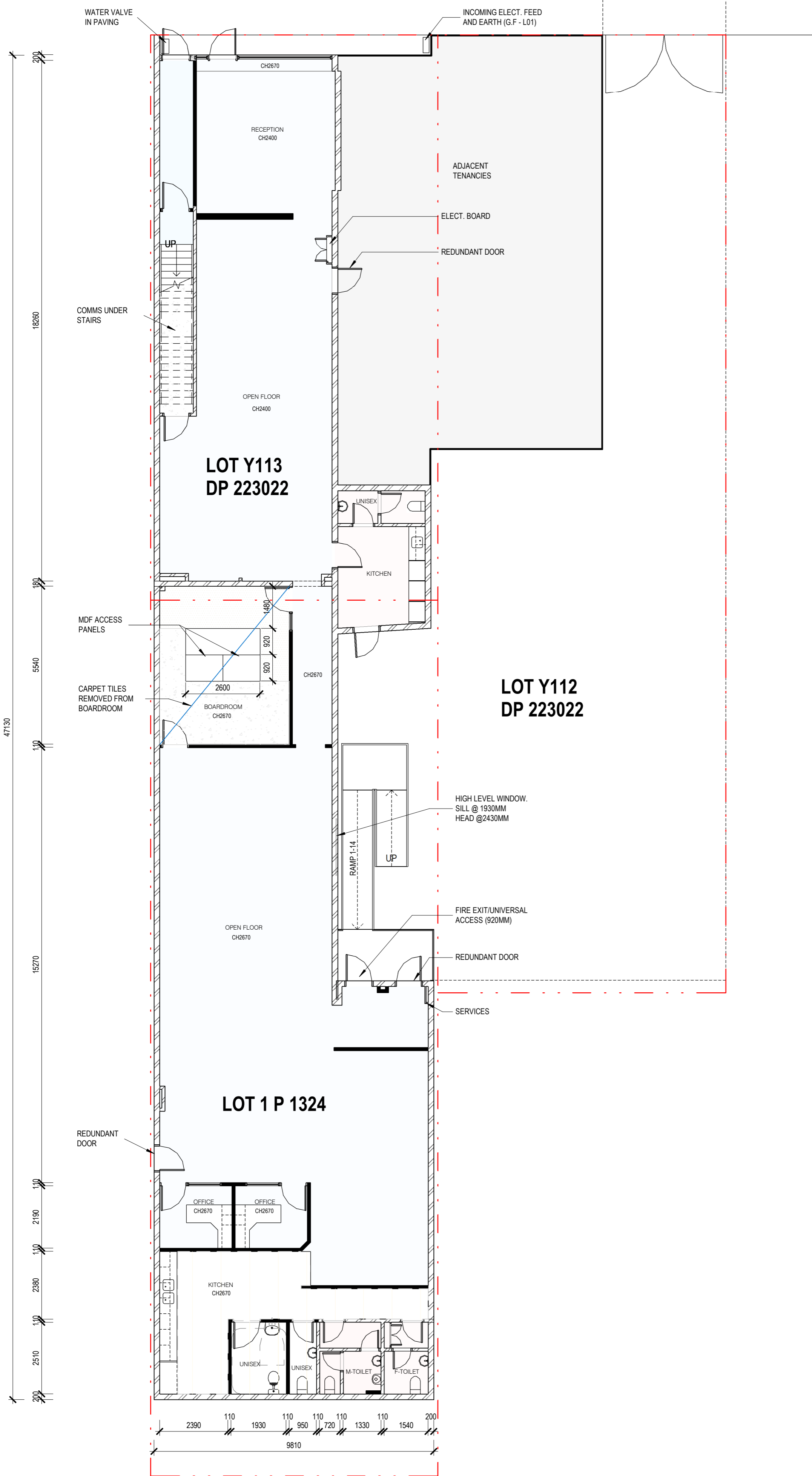
1. Completed Metropolitan Region Scheme (MRS) Form 1
2. Plans at a scale not less than 1:500 (A3) showing:-
 - (i) the location of the site including street names, lot number(s), north point and the dimensions of the site;
 - (ii) the existing and proposed ground and floor levels over the whole of the land that is the subject of the application, including details of proposed cut and fill, and retaining walls;
 - (iii) the location, metric dimensions, materials, finishes and type of all existing and proposed structures, including services, on the land that is the subject of the application and all existing structures and vegetation proposed to be removed;
 - (iv) the existing and proposed use of the site, including proposed hours of operation and buildings to be erected on the site;
 - (v) the existing and proposed means of access and egress for pedestrians and vehicles to and from the site;
 - (vi) the location, number, dimensions and layout of all car parking spaces intended to be provided, including provision for the disabled;
 - (vii) the location and dimensions of any area proposed to be provided for the loading and unloading of vehicles carrying goods or commodities to and from the site and the means of access to and from those areas;
 - (viii) the location, dimensions and design of any open storage or trade display area and particulars of the manner in which it is proposed to develop those areas;
 - (ix) the nature and extent of any open space and landscaping proposed for the site; and
 - (x) proposed external lighting and signage.
3. Plans, elevations and sections, as appropriate, of any building or structure proposed to be erected or altered and of any building or structure it is intended to retain;
4. Any specialist studies that the responsible authority may require the applicant to undertake in support of the application such as traffic, heritage, environmental, engineering or urban design studies;
5. Any management plans the responsible authority may require to support or implement the application; and
6. Any other plan or information that the responsible authority may require to enable the application to be determined. This may include scale models or information in digital formats.

For additional information please refer to Development Control Policy 1.2
www.dplh.wa.gov.au/getmedia/37533b97-e0ad-4947-9d00-c4d62fa92746/DCP_1-2_general_principles

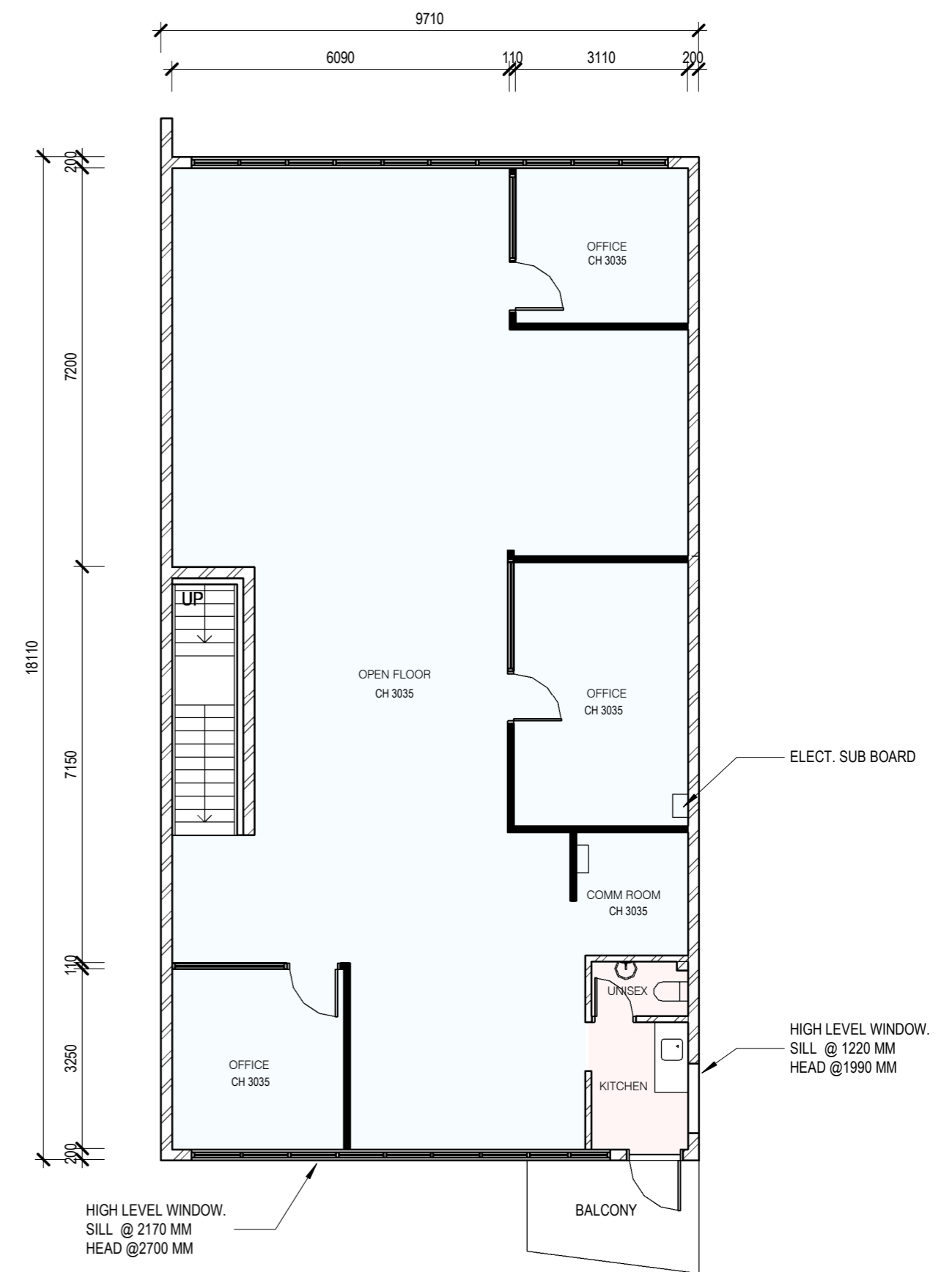
Development application checklist - lodgement requirements

<p>Application signatures</p>	<p>The MRS Form is to be signed by the registered proprietor/s as shown on the certificate/s of title. Where the landowner/s cannot sign, an authorised agent can sign and attach evidence of the authority. If the subject land is owned by a company, you must confirm whether it is a sole proprietorship company and state the full name/s and position/s of the company signatory/ies. Appropriate company signatory/ies include one director and the company seal, two directors, or one director and one secretary. Eg: _____ John F. Smith - Director Peter S James - Director Smith Pty Ltd Smith Pty Ltd Or _____ John F. Smith - Sole Director Smith Pty Ltd If the subject land is owned by a strata company, consent can be signed by the strata company secretary or by an elected person of the strata company providing proof of authority either by letter of delegated authority, signed by all strata owners or minutes showing delegated authority.</p>
<p>Certificate of Title</p>	<p>Ensure the Certificate of Title/s is/are current (within 6 months) and provide copy/s.</p>
<p>Change of name</p>	<p>Applications made by either private owners or companies who have changed names to that depicted on the Certificate of Title, must provide supporting documentation showing the change of name such as:</p> <ul style="list-style-type: none"> • a transfer of land document that incorporates a lodgement receipt, • a company search from the Australian Securities and Investment Commission, • a marriage certificate or • a change of name certificate.
<p>Contacts</p>	<p>A contact name, phone and email address is essential, in the event more information is required and for issuing correspondence relating to the Department's decision.</p>
<p>Contracts of sale</p>	<p>Where the land is subject to a contract of sale or offer and acceptance, evidence of landowner's consent must be provided. Relevant evidence may include;</p> <ul style="list-style-type: none"> • an express provision of consent by the vendor on the contract of sale or offer and acceptance, • a letter of consent from the registered proprietor/s giving prospective purchaser/s consent to lodge the application or • a copy of the transfer of land document that incorporates a lodgement receipt.
<p>Crown land</p>	<p>Where the land is registered in the name of the Crown, the application form must be signed by an authorised officer of the Department of Lands, stating the name and position. Alternatively, a letter of consent from the authorised Crown land officer.</p>
<p>Deceased estates</p>	<p>Where the land is registered in joint tenants, a copy of the death certificate of the deceased landowner must be provided. Where the land is registered in tenants in common, a copy of the grant of probate or endorsed enduring power of attorney must be provided.</p>
<p>Designated Bushfire Prone Area</p>	<p>If the proposed development is located within a Bushfire Prone Area according to the Map of Bush Fire Prone Areas, then bushfire hazard issues should be identified and addressed (e.g. by providing a BAL assessment(s) or BAL Contour Map and a Bushfire Management Plan with the application). If NA is selected and the development is in a designated bushfire prone area then a short statement justifying why SPP 3.7 does not apply should be included.</p>
<p>Emailed documents</p>	<p>Emailed applications or documents are acceptable, however the application must be signed by the registered proprietor/s.</p>
<p>Government agencies</p>	<p>Where the land is registered in the name of a government authority, the application form must be signed by an authorised officer of the relevant authority, stating the name and position of the signatory/s. Alternatively, a letter of consent signed by an authorised officer.</p>

JAMES STREET



1 GROUND FLOOR
SCALE: 1 : 100



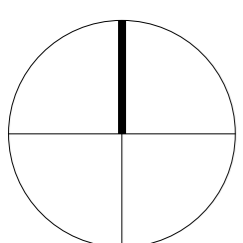
2 LEVEL 01
SCALE: 1 : 100

LEGEND

- LOT BOUNDARY
- ADJACENT TENDENCIES
- WALL TYPES
 - ▨ BRICKWORK
 - ▬ PLASTERBOARD
- FLOOR TREATMENT
 - CARPET
 - TILE
 - VINYL
 - CONCRETE
 - MDF

	G.F.A (M2*)	N.L.A (M2*)
GROUND FLOOR	335	267
LEVEL 01	154	149
TOTAL	489	416

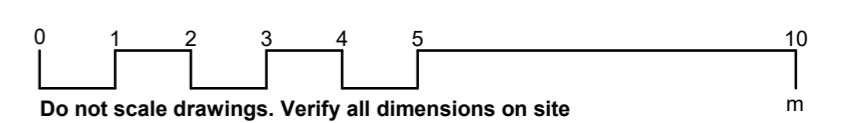
*NOTE THESE AREAS ARE APPROXIMATE ONLY



247 JAMES ST, NORTHBRIDGE
EXISTING LAYOUT

Drawing:
Drawing no:
Issue:
Scale @A1:
Date:

FLOOR PLANS
A.DA1000
A
1 : 100
10.02.22



architectus™

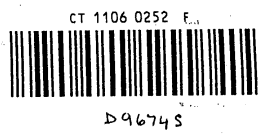
Transfer 452/1018 5671-50.
 Application 27019-50
 From Volume 118 21311-52
 66
 97 108

32896/63



REGISTER BOOK.
 Vol. 1106 Fol. 252

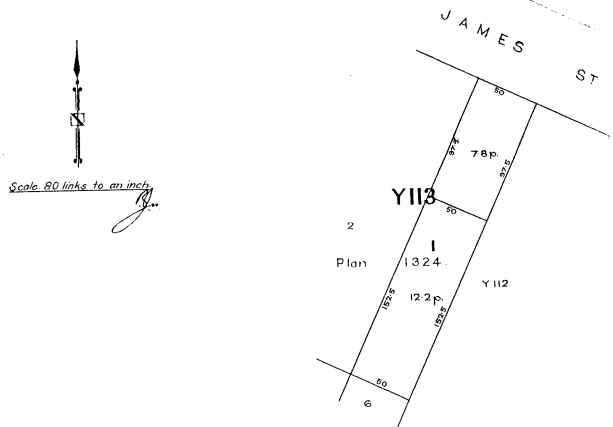
INDEXED bc



Certificate of Title

under "The Transfer of Land Act, 1893" (56 Vic., 14, Sch. 5).

Yvle Tomich of 372 Newcastle Street, Perth, Married Woman, is now the proprietor of an estate in fee simple subject to the easements and encumbrances notified hereunder in all those pieces of land delineated and coloured green on the map hereon containing together twenty perches or thereabouts, being portion of Perth Town Lot Y113 including Lot 1 on plan 1324.



Dated the fifteenth day of January One thousand nine hundred and forty-eight
W. J. Tomich
 Registrar of Titles.

TRANSFER 2208/1950 to Tomica Kate Tomich of 372 Newcastle Street, Perth, Widow.
 Registered this 13th day of February 1950
 at 3.25 o/c. *W. J. Tomich*
 Assistant Registrar of Titles

Transfer H6349/63. An estate for life is transferred to Tomica Kate Tomich of 372 James Street, Perth, Widow and an estate in fee simple in remainder expectant upon her death to Thomas Victor Tomich of 15 Porter Street, Kalgoorlie, Catholic Priest. Registered 7th August 1963 at 10.00 oi. L.F. Symes

Transfer 58045/66 to Hotel & Cafe Supplies Pty Ltd. of 833-5 Wellington Street, Perth. Registered 22nd August 1966 at 9.28 oc. J.F. Kennedy

Application F818043. The correct name and address of the proprietor is HCS Holdings (WA) Pty Ltd of 245-249 James Street, Perth. Registered 1st March 1995 at 8.19 hrs.

Transfer G43254 to Sawasdee Pty Ltd of 5th Floor, London House, 216 St George's Terrace, Perth. Registered 30th November 1995 at 15.21 hrs.



For encumbrances and other matters affecting the land see back.

21/02/97/146-106-11/1.

EASEMENTS AND ENCUMBRANCES REFERRED TO.

Collateral
 Instrument stamped 18/11/1950
MORTGAGE 10109/1950
 Tomica Kate Tomich to
 The National Bank of Australasia Limited
 Registered 17th August 1950 at 10.30 a.m.
 No. *J. H. ...*
 Assistant Registrar of Titles

Mortgage Cl36964 to Fay Dedogi, of 27 Meenaar Crescent, Mount Lawley, Married Woman. Registered 13th October, 1982 at 12.14 p.m.

DISCHARGED

Mortgage Cl36965 to Banque Nationale de Paris. Registered 13th October, 1982 at 12.14 p.m.

DISCHARGED

5958/1952 of Mortgage 10109/1950.
 19th July 1952 at 10.30 a.m.

W. Mackinnon

Discharge C794518 of Mortgage Cl36964. Registered 18th June, 1984 at 12.34 p.m.



Discharge C794519 of Mortgage Cl36965. Registered 18th June, 1984 at 12.34 p.m.



Mortgage 5806/66, to Janko Lukan, Market Gardener and Laura Lukan, his wife, both of 17 Main Street, Osborne Park. Registered 22nd August 1966 at 9.28 a.m.

Assistant Registrar of Titles

Mortgage C794520 to Douglas Horace Neame and Ivy Edith Neame, both of 1A Lilac Place, Dianella, Investors. Registered 18th June, 1984 at 12.34 p.m.

Mortgage A14135 to Bank of New South Wales. Registered 21st February 1968 at 10.44 a.m.

Mortgage C794521 to Banque Nationale de Paris. Registered 18th June, 1984 at 12.34 p.m.

DISCHARGED

DISCHARGED

As to the interest of Laura Lukan in Mortgage 5806/66 Application A196108 on the 18th March 1969 Laura Lukan one of the mortgagors died and on the 13th June 1969 Probate of her Will was granted to Janko Lukan of 17 Main Street, Osborne Park, Revised Market Gardener, the Executor herein named.

Discharge D492831 of Mortgage C794520. Registered 10th June 1987 at 10.53 a.m.



Transfer F818045 of Mortgage C794521 to Bank of Western Australia Ltd. Registered 1st March 1995 at 8.19 hrs.



Discharge A196109 of Mortgage 5806/1966. Registered 29th July 1969 at 9.17 a.m.

Mortgage F818048 to Bank of Western Australia Ltd. Registered 1st March 1995 at 8.19 hrs.

DISCHARGED

Discharge A196110 of Mortgage A14135. Registered 29th July 1969 at 9.17 a.m.

Discharge G43252 of Mortgage F818048. Registered 30th November 1995 at 15.21 hrs.



Mortgage A196111 to Custodians Pty Limited. Registered 29th July 1969 at 9.17 a.m.

Discharge G43253 of Mortgage C794521. Registered 30th November 1995 at 15.21 hrs.



Mortgage A196112 to Banque Nationale de Paris. Registered 6th May 1969 at 10.30 a.m.

Mortgage G43255 to IF & I Custodians Pty Ltd. Registered 30th November 1995 at 15.21 hrs.

DISCHARGED

Discharge B795933 of Mortgage A196111. Registered 10th October 1979 at 2.59 p.m.

Discharge G920317 of Mortgage G43255. Registered 7th October 1998 at 8.16 hrs.



Discharge B795934 of Mortgage A196112. Registered 10th October 1979 at 2.59 p.m.

Mortgage B795935 to Lois Ann Macneish of 36 Pictou Crescent, Bankburg, Married Woman. Registered 10th October 1979 at 2.59 p.m.

Mortgage G920318 to National Australia Bank Ltd. Registered 7th October 1998 at 8.16 hrs.



Mortgage B795936 to Banque Nationale de Paris. Registered 10th October 1979 at 2.59 p.m.

DISCHARGED

Discharge Cl36962 of Mortgage B795935. Registered 13th October, 1982 at 12.14 p.m.

Discharge I909698 of Mortgage G920318. Registered 8th June 2004 at 8.04 hrs.



Discharge Cl36963 of Mortgage B795936. Registered 13th October, 1982 at 12.14 p.m.

CT 1106 0252 B



CERTIFICATE OF TITLE.

Vol. Fol.

WESTERN



AUSTRALIA

TITLE NUMBER

Volume Folio

2017 937

RECORD OF CERTIFICATE OF TITLE
UNDER THE TRANSFER OF LAND ACT 1893

The person described in the first schedule is the registered proprietor of an estate in fee simple in the land described below subject to the reservations, conditions and depth limit contained in the original grant (if a grant issued) and to the limitations, interests, encumbrances and notifications shown in the second schedule.

BGRoberts
REGISTRAR OF TITLES



LAND DESCRIPTION:

LOT Y 112 ON DEPOSITED PLAN 223022

REGISTERED PROPRIETOR:
(FIRST SCHEDULE)

SAWASDEE PTY LTD OF 5TH FLOOR, LONDON HOUSE, 216 ST GEORGE'S TERRACE, PERTH
(T G043254) REGISTERED 30/11/1995

LIMITATIONS, INTERESTS, ENCUMBRANCES AND NOTIFICATIONS:
(SECOND SCHEDULE)

1. THE LAND THE SUBJECT OF THIS CERTIFICATE OF TITLE EXCLUDES ALL PORTIONS OF THE LOT DESCRIBED ABOVE EXCEPT THAT PORTION SHOWN IN THE SKETCH OF THE SUPERSEDED PAPER VERSION OF THIS TITLE.

Warning: A current search of the sketch of the land should be obtained where detail of position, dimensions or area of the lot is required.
Lot as described in the land description may be a lot or location.

-----END OF CERTIFICATE OF TITLE-----

STATEMENTS:

The statements set out below are not intended to be nor should they be relied on as substitutes for inspection of the land and the relevant documents or for local government, legal, surveying or other professional advice.

SKETCH OF LAND: 2017-937 (Y 112/DP223022)
PREVIOUS TITLE: 490-66
PROPERTY STREET ADDRESS: 247 JAMES ST, NORTHBRIDGE.
LOCAL GOVERNMENT AUTHORITY: CITY OF PERTH

NOTE 1: A000001A PENDING SURVEY - DIAGRAM 96745.



PLAN 1324

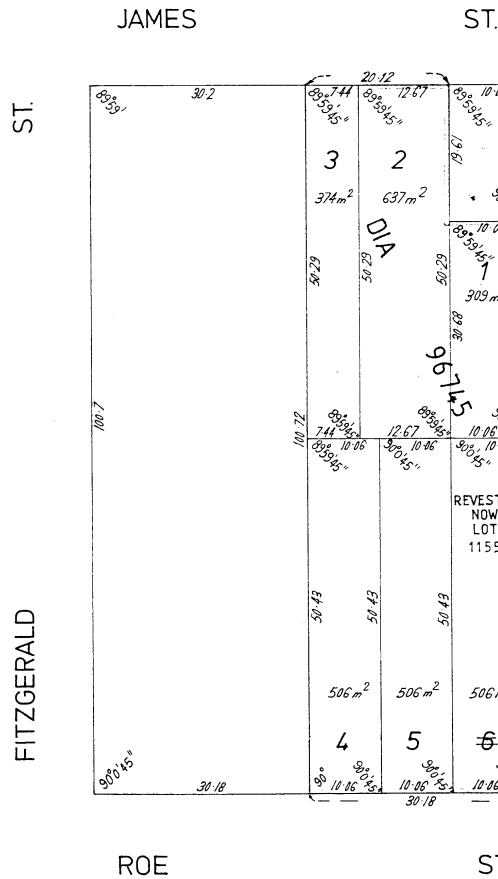
PERTH TOWN LOT Y 113

SCALE - 1:750
 L.T.O. COR. 92-96
 F.B. - 866
 INDEX PLAN - PERTH 1000 2550
 C.T. 65-46



APPROVED
 18-6-96

J.N.R.
Sinn



PLAN 1324

Ruah Safe Night Space for Women Operational Management Plan

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1. Background

This Management Plan supports the Development Application for 247 James Street, Northbridge as a Safe Night Space for Women. This proposed service would exist alongside the existing Engagement Hub, which is already in operation on the site.

About Ruah

Ruah Community Service has been providing services to rough sleepers in Western Australia for more than 60 years. In the last five years, Ruah led the successful '50 Lives 50 Homes' project, Western Australia's first Housing First initiative and collective impact project that provided sustainable housing and support to more than 160 vulnerable people. Following the success of this initiative, Ruah has been awarded the Housing First Homelessness Initiative System Coordinator function (HFSC), providing overall coordination to the Department of Communities: Housing First Homelessness Initiative (HFHI).

Ruah's manifesto is cited below:

"We believe we are all better off, as a community, as a society, if we are all connected. We need the disconnected and the vulnerable as they need us. They are us. We, but for advantages of birth or circumstance, are them – human hearts, in need of human connection and meaning in their lives. There is more that unites us than divides us, yet the most disadvantaged are stigmatised, without a voice for change. Change does not come easily. We take our legacy and inspiration from the bold, courageous individuals from as far back as the 17th century doing what nobody else dared. Not because it was asked of them but because it was right, and it was needed. Today Ruah will not meander in our pursuit of measurably transforming lives. We go boldly toward not just helping people experiencing homelessness but ending homelessness. Ending domestic violence. Changing the lives and creating opportunities for those experiencing mental health issues. We choose to work with the most vulnerable, the most challenged – because it's difficult, because this makes a difference."

As well as addressing rough sleeping, Ruah delivers high quality wrap around supports to more than 3,000 people a year in the areas of mental health, housing, homelessness, family and domestic violence and community legal services. Our model of care recognises the universality that underpins all human needs and operates through a 'no wrong door' approach. Whichever pathway people enter our services they can access the supports they need when they need them.

Our capacity to help change the lives of the people we work with is underpinned by strong corporate and clinical governance frameworks and processes that are robust and authentic – built from supporting people at a grassroots level and accredited against the National Safety and Quality Health Service Standards and National Standards for Mental Health Services.

Ruah is an independent, not-for-profit organisation lead by a highly experienced Board and Executive. We are driven to make a difference for people who are vulnerable, disadvantaged and discriminated against. Along with mental health and family and domestic violence, housing and homelessness is one of our three core service areas.

Over 2021 Ruah have initiated an innovative and ambitious project made even more challenging and important by the significant additional demands on Ruah as a result of the COVID-19 pandemic. The motivation was our unrelenting drive to best serve and support the people with whom we work – our clients – and to ensure we can do that decade, after decade, after decade. Ruah's new Model of Care, being adopted in 2021-22, guides our staff on how we support people through their journey of change. Additionally, an enhanced service delivery model has also been launched that aims to make important specialist help in areas such as child and adolescent psychology and financial counselling easily accessible across our client base.

How we support people through their journey of change moves from the traditional one-on-one support worker model to a team approach, where each client has the access to and input they need at any point in time, from key workers, support workers and specialists who can walk beside them as they navigate their way from being 'stuck' through to believing, trying, learning and, ultimately, self-reliance – based on the Outcomes Star Journey of Change model. That might also mean accessing support and services from across Ruah – a 'no wrong door' approach. Someone experiencing homelessness as a result of family violence might also access mental health

support services and even legal advice and support (through Ruah Legal Services) as part of their journey of change. The people with whom we work and whom we support experience our breadth of services as 'One Ruah'.

Ruah's management infrastructure ensures quality administrative support for the delivery of contracted services due to the way it has been designed and the additional administrative supports it makes available. Our contracted services leverage off an Executive team with over 80 years' experience in providing community services in Australia and Europe. Our contracted services also have the support of a Finance & Payroll team that lead the way in the WA NFP sector by providing live data and results through dashboard reporting allowing services to make informed decisions; and a People Development (HR) team which provides online staff management portals and learning and development modules that ensure staff are supported throughout their employment and have the relevant tools and training to complete their job to the highest standards.

2. Overview- Ruah Safe Night Space for Women

The Ruah Safe Night Space for Women (SNS) would exist at the same facility as the existing Ruah Engagement Hub (REH). Each provides a different, but complementary service, being:

- The existing **Ruah Engagement Hub** offers holistic support to those experiencing homelessness with a linkage to support services and engagement workers.
- A **Safe Night Space for Women** experiencing homelessness and other vulnerabilities to have access to an emergency overnight space for those who have no other accommodation options and who would otherwise be rough sleeping in the CBD.

A part of this facility is already in operation (the REH), while the other service (the SNS) is planned to begin operation as soon as practical, and other preparations including staff recruitment and training have been completed.

Existing- Ruah Engagement Hub

Information on the role of the REH is described below:

- A welcoming Engagement Hub, providing a range of support services during the day.
- Ruah has successfully run an engagement hub service, (operating hours 8.30am to 2:00pm) for people experiencing homelessness for more than 60 years, since opening Perth's first soup kitchen in 1959. Our understanding of the homelessness context and issues at the system and client level within the local context draws on this long legacy and experience within the local WA context. Support includes a linkage with support services and engagement workers. We offer a touch point with services linking people with accommodation services, specialist services such as alcohol and other drug (AOD) support or mental health services and legal services. The service offers provision of donations, emergency relief and food.
- The REH links in with other Housing and Homelessness services at Ruah. Based on our experience through the 50 Lives 50 Homes and 20 Lives 20 Homes projects, we will employ a range of strategies to meet the housing needs and choices of our clients including:
 - Short-term & immediate options – Such as contacting EntryPoint for access to crisis beds, referrals to crisis service Tom Fisher House.
 - Lodging, including long-term lodging options - Exploring a variety of low-cost rental housing options like Urban Fabric and Brooke Stone Properties.
 - Supported accommodation options – Such as Wandjoo Bidi, Boorloo Bidee Mia, Koort Boodja Foyer Oxford.
 - Longer-term housing options - Various existing housing properties available through a variety of housing providers from Department of Communities: Housing to Community Housing options such as Housing Choices, Foundation Housing, Community Housing Limited and Rise.
 - By Name List - Ruah is connected to the state-wide By Name List, which enables organisations across the homelessness sector to collaboratively track and support people experiencing homelessness and supports the allocation of housing and resources to the most vulnerable people as a priority. If people present to our services and are not listed on the By Name List,

workers will explain what the list is and its purpose, and, if people consent, workers add them into the system.

- Rough Sleeper Coordination Group (RSCG) Meetings -Staff attend the weekly RSCG which aims to facilitate collaboration across agencies to address support, accommodation and housing needs for people experiencing homelessness, specifically rough sleeping or persistent homelessness. The REH is staffed with support workers to meet the presenting needs of the people by building relationships and responding and supporting in times of crisis. We have four staff on-site throughout the day. They use a range of different tools including referrals to appropriate services, advocacy, informal counselling, motivational interviewing, engagement, relationship building, emotional support, education and basic life skills using trauma-informed practice in their work. We also have security on-site to support and have close relationships partner agencies and police.
- The REH implements trauma-informed practice specifically tailored to the demographics of the people who use the service, with support workers completing training in trauma-informed practice and applying the key principles and practices of trauma-informed care in all their work.
- Advocacy offered by support workers is an integral part of preventing homelessness for people who may find themselves at risk. The REH offers a range of community outreach visiting services and the demand is regularly reviewed by people who use the service and workers.

Proposed- Safe Night Space for Women

Information on the role of the SNS is described below:

- Ruah was awarded the Safe Night Space, to respond to the urgent need for a safe and culturally secure night space for women sleeping rough in Perth.
- The service model and planning presented was based on Ruah's 60+ years' experience supporting people experiencing homelessness and women escaping family and domestic violence in Perth. During Homelessness Week 2019 Ruah piloted a SNS for women from the Ruah engagement hub located at James Street, Northbridge.
- The aim of the service is to provide a safe and culturally secure night space for women sleeping rough in Perth.
- It is accessible to women during the evenings, seven days a week 365 days per year, and has capacity for 30 women a night. From our experience the demand in winter is higher and therefore due to weather events such as hot conditions or extreme winter conditions the opening hours are adapted to ensure safety of women escaping crisis.
- Women who access SNS may include chronically street-present women (rough sleepers), women escaping family and domestic violence who would otherwise face being forced onto the streets, and women awaiting placement in transitional or long-term accommodation. The specific criteria includes:
 - Women over the age of 18+
 - Women who are street-present (rough sleepers)
 - Women escaping family and domestic violence who would otherwise face being forced onto the streets
 - Women awaiting placement in transitional or long-term accommodation
 - Women who have not exceeded their placement time
- The SNS operates with a low threshold approach, which places minimal demands on the people who use the services. It offers services without attempting to control people's life choices, offering harm minimisation and support to engage with further services and supports when requested.
- The SNS takes referrals from other agencies, emergency services and walk-ins. Our in-depth understanding of rough sleepers in the cohorts addressed by the proposed services, in conjunction with our service data, has informed our referral modelling.
- Our current operational approach at the Safe Night Space (SNS) caters to a maximum of 20 scheduled referrals, 5 walk-ins, and 5 emergency cases per night. In scenarios where our capacity is reached, individuals are directed to alternative services like Crisis Care for support. We encourage those we cannot accommodate to seek safer locations, and we coordinate with local authorities only when necessary to ensure everyone's safety.
- The SNS model is dynamic, designed to be scalable and responsive to fluctuating demands and crises, such as extreme weather, health emergencies, or other situational challenges. Our adaptability allows us

to provide the best possible service within our means, continually striving to expand our capabilities to avoid having to turn individuals away.

- The services will be operated in a manner that ensures maximum utilisation so that as many rough sleepers as possible can be off the streets and then supported into housing. We will actively link with other services in the evenings to fill all available spaces.
- For the identified cohorts, the priority is safety from the streets. Most chronic rough sleepers on the streets of Perth are connected in with services such as engagement hubs and therefore this group will likely represent most of the referrals. After safety, a secondary goal for this cohort is to promote positive outcomes in which people can work with case workers, engage in linked services, and be supported into permanent housing.
- This group, once housed, will reduce the demand for the service and allowing additional people into the service. People who do not wish to engage in formal support, are newly homeless or are from another area will access the SNS through the self-presenting or emergency pathway.

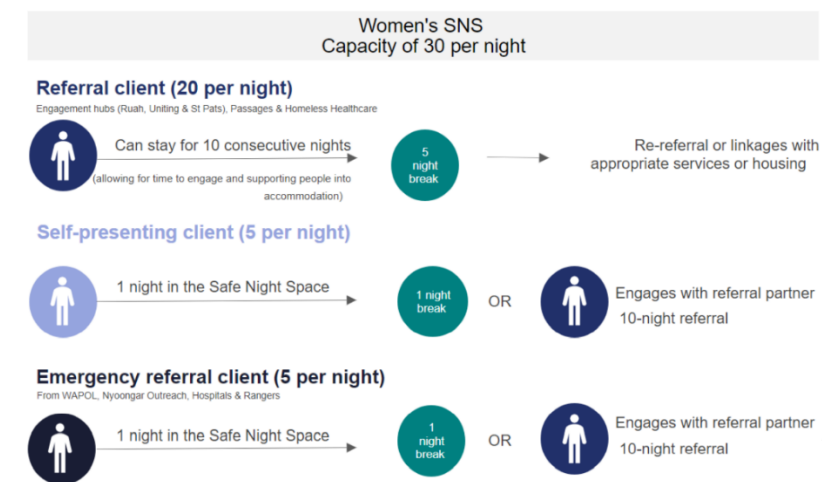


Diagram: Capacity of the proposed SNS

3. Operation of the SNS facility

Staffing

The SNS will be staffed with Ruah workers between 6:30pm and 7:30am each night (client opening hours, with security on-site are from 7pm until 7am). From our experience the demand in winter is higher and therefore due to weather events such as hot conditions or extreme winter conditions the opening hours are at times, slightly adapted to ensure the safety of women escaping crisis.

The Ruah team consists of:

- 6:30pm – 12:00am / Key Worker x 1
- 6:30pm – 12:00am / Support Worker x 1
- 11:30pm – 7:00am / Engagement Worker x 1
- 12:00am – 7:30am / Support Worker x 1

All Ruah staff are appropriately qualified and receive regular training and supervision and will leverage their experience in the sector. They are supported in the evenings by Ruah’s internal on-call which is staffed by management. During usual business hours Ruah staff also have support from the Housing & Homelessness Leadership Team.

Security Management

Composition of the Security Team

- The facility will be staffed by a dedicated security team, comprising of security guards on duty from 7:00 pm to 7:00 am daily.

Role and Responsibilities

- Subcontracted Security Services – Security personnel will be subcontracted to ensure professional, efficient, and effective service.
- Primary Duties – The core responsibility of our security team is to maintain safety within the facility. Their roles encompass surveillance, risk mitigation, and incident management.
- Client-Staff Relationship – Based on our experience, we recognise the importance of a positive relationship between the security team and our clients, particularly those who are rough sleepers. Fostering a harmonious environment is crucial for the effective operation of our services.
- Induction and Familiarisation – Ruah will conduct thorough inductions for all security personnel to familiarise them with the facility's procedures, environment, and regular clients.

Training and Licensing Requirements

- All security staff must hold a valid license in accordance with the Security and Related Activities (Control) Act 1996 and the Security and Related Activities (Control) Regulations 1997.

The security protocol is designed to ensure a safe and secure environment for both clients and staff, fostering trust and respect within the facility.

Access to the Building

The James St facility features two access points:

- Main Entrance: Located at the front on James Street, this entrance is primarily for client use. It will be managed by security officers at a reception and triage desk. To respect our neighbours, a 10pm attendance curfew will be enforced for clients entering through this door.
- Staff Entrance: Situated in the rear car park, this entrance is exclusively for staff access and requires swipe card authentication. Staff may also enter through the Main Entrance using the swipe card system.

Parking Provisions

- Staff Parking: Designated secure parking for staff is available at the rear of the building.
- Client Transportation: Most clients are expected to utilise public transport or walk to the facility. Clients with vehicles will be advised not to park directly in front of or adjacent to the facility. They will be directed to alternative parking options in the nearby James Street and wider Northbridge area, with staff providing information on more affordable parking solutions.

Deliveries and Suppliers

- Parking for Deliveries: Suppliers and delivery personnel will use the rear parking area of the building.
 - Delivery Access: They are required to present themselves at the Main Entrance. Deliveries will generally consist of general office supplies and food items.
- This building management plan for the James St facility has been designed to ensure smooth operations while maintaining a secure, accessible, and neighbour-friendly environment.

Servicing and Cleaning Plan

The facility will implement a comprehensive servicing and cleaning strategy, combining internal efforts with contracted professional services to uphold a high standard of cleanliness and safety.

- Hybrid Cleaning Approach – Routine operational cleaning tasks, such as maintaining the kitchen and office spaces, will be conducted by our in-house staff. This includes everyday activities like surface cleaning, dishwashing, and organising common areas.
- Contracted Cleaning Services – To complement our internal cleaning regimen, we will engage professional cleaning services for more extensive cleaning requirements. These services will carry out regular and deep cleaning sessions to ensure the facility meets stringent hygiene standards.
- Rubbish Management – We encourage everyone at the facility to take responsibility for their litter, avoiding leaving waste inside or around the building. Signage and instructions reinforcing this policy will be prominently displayed.
- Monitoring and Disposal – Our staff will consistently monitor the facility's exterior, particularly the front area, for any unattended or unwanted personal items. Any such items will be removed and disposed of appropriately, with larger belongings being stored in secured bins at the facility's rear.

This approach ensures that the daily maintenance is efficiently managed in-house, while specialised cleaning needs are addressed by professional services, maintaining a hygienic, orderly, and inviting environment at the facility.

Outdoor Cleaning

Ruah will continually monitor the frontage and report on the maintenance of the outdoor areas at the facility. Recognising the importance of a clean environment for all, we are monitoring the public footpath in front of the building. Our staff and security are vigilant in removing any rubbish that may accumulate directly outside our facility to maintain a presentable space for both our clients and the community.

Ruah will provide periodically deep cleaning services as needed. Ruah is attentive to the condition of the premises and will remain responsive to any significant issues that may arise. Ruah acknowledges that the maintenance of the footpath falls under the jurisdiction of the City of Perth, and Ruah will report any concerns that may require the City's attention.

4. Risk and Complaint Management of Activities on Site

The facility includes a robust framework for managing risks and addressing complaints, ensuring:

- A safe environment for both clients and staff
- Transparent and accessible complaint resolution processes
- Regular reviews of safety protocols and risk management strategies.

Ruah's Management Approach

Ruah has a robust Quality Assurance system in place that will ensure compliance with all Quality Assurance requirements. Organisational and strategic risks are monitored by a Risk and Quality Team, reporting to senior leadership and Ruah's Board through a Risk and Quality Committee (comprised of Executive and Managers) that meets regularly (at least every six weeks), and a Finance Audit and Risk Committee (comprised of Ruah directors, CFO, CEO, Finance Manager, and Risk and Quality team) which meets bi-monthly.

Ruah uses Microsoft SharePoint systems, which are cloud-based, secure, and can be accessed by all workers for management and control of policies, procedures, and documents; reporting incidents, hazards, feedback, and quality improvements, with automated email notifications and escalation; and auditing.

Ruah's business activities are open, transparent and comply with the City of Perth's Statement of Business Ethics, relevant legislation and the City's policies, procedures, and practices. We employ appropriately qualified workers who demonstrate a high-level of commitment to good process and discipline. Ruah also has a strong training culture and promotes individual professional development.

Ruah's financial systems and procedures are continuously reviewed to ensure they are accurate, efficient and fit-for-purpose. Ruah's financial systems are secure and cloud-based, and provide appropriate access for workers,

based on positions and security levels. Ruah undertakes interim and annual financial audits and was issued with an unmodified audit report with no recommendations for the FY2020.

Ruah was assessed against the National Standards for Mental Health Services and the National Safety and Quality Health Services Standards in November 2018 and achieved certification through to January 2022. Ruah also recently achieved Rainbow Tick Accreditation and anecdotal feedback was that we had set new benchmarks.

Ruah has many strategies in place to mitigate risk and ensure a safe environment for staff, clients, and the community. Ruah is committed to the health and safety of our people and the environment around us.

Our corporate-wide framework will straddle our use of the space and is aligned to AS/NZ 31 000:2018 Risk Management Guidelines and includes the following components:

- I. Delegation of Authority
- II. Risk Appetite Statement, with zero tolerance for safety risks
- III. Risk Management Procedure and Process Chart
- IV. Risk Matrix: supports consistent assessment of risk
- V. Safety Management Procedure
- VI. Critical Incident Process: reporting, investigation, and review
- VII. Risk and Quality Committee
- VIII. Organisational Risk Register and Strategic Risk Register

Collectively, the framework ensures that Ruah understands, monitors, and manages the risks associated with the type of work that Ruah does.

Specific Management Strategies for the SNS

Ruah will address the specific areas of concern through the following management strategies:

Managing Noise and Other Disturbances at the SNS

To maintain a peaceful and respectful environment at the facility, particularly in consideration of our neighbours and the local community, we have implemented a comprehensive strategy to manage noise and other disturbances:

- *Security Personnel Contracting* – Ruah employs a team of contracted security personnel, ensuring a professional approach to facility safety and disturbance management.
- *Monitoring and Patrols* – Security staff are tasked with monitoring client behaviour both within and external to the premises, conducting regular patrols to maintain order and address any potential disturbances.
- *Security Licensing* – All security personnel are licensed in compliance with the Security and Related Activities (Control) Act 1996, ensuring that they are qualified and trained to handle various situations that may arise.
- *Incident Escalation Procedures* – An established procedure is in place for incident escalation, including the management of clients who may refuse to leave the premises, to ensure that any disturbances are resolved in a safe and effective manner.
- *Staff and Security Collaboration* – During operational hours, our staff and security team work closely together to promptly address any concerns or disturbances, ensuring a harmonious environment for all.
- *Mandatory Security Presence* – At least one licensed security professional will be on-site during all operational hours to oversee and manage the facility's environment.
- *Client Responsibilities* – All clients are required to agree to a Rights & Responsibilities form upon entry, which outlines expected behaviours and mutual respect for property and individuals, both inside and outside the facility. Clients unable to adhere to these expectations are required to leave and must engage in a discussion with a senior worker upon their return to address their behaviour.

Through these measures, the SNS aims to effectively manage noise and disturbances, ensuring a safe, respectful, and peaceful environment for clients, staff, and the surrounding community.

Managing Removal of Unwanted or Unattended Personal Belongings

The following measures will be in place to manage the removal of unwanted or unattended personal belongings:

- Clients must agree to our Rights & Responsibilities policy, which emphasises maintaining a clean environment within and around the facility.
- Clients are expected not to leave rubbish or personal items unattended; non-adherence will necessitate a discussion with a senior staff member upon their next visit to address this behaviour.
- Ruah staff will routinely check for and clear any unattended items left in front of the property. Disposal of such items will be handled sensitively, with storage options provided for larger belongings.
- Secure outdoor storage crates for larger items and lockers for smaller valuables will be available to clients. This aims to minimise clutter and maintain orderly surroundings.
- Signage at the front of the property will inform clients of our cleanliness standards and the protocol for unattended items, which are subject to removal during regular inspections.

Management of Congregation and Queuing

The following measures will be in place to manage any potential congregation and queuing of clients:

- Signage will direct clients to alternative services during non-operational hours and request that clients refrain from gathering outside the facility when it is closed.
- The Rights & Responsibilities policy will be amended to include a clause urging clients to respect our neighbours' comfort by not congregating around the Hub when it is not open.
- During operational hours, security personnel will manage client flow and queuing to ensure orderly access to the facility and minimise any disruption to the local area.
- Clients who congregate outside will be invited in during open hours or asked to move on respectfully. Persistent refusal will be handled according to our incident escalation procedure, ensuring the well-being of all parties involved.

This plan reflects Ruah's commitment to responsible property management, respecting our clients' needs while ensuring the safety and cleanliness of the community space around the facility.

Management of Clients Not Suitable for the SNS

When clients present to the SNS, it is possible that the service may not be suitable for everyone and their needs. SNS is a low-threshold service, meaning people can come in under the influence of drugs or alcohol, as long as their behaviour does not negatively impact others. It is an open space, not individual rooms, which is also not suitable to everyone's needs and this may be because they have been impacted by trauma and not able to be around other people. Clients may also present unwell or injured and therefore require medical care, including hospital-level care.

Staff will assess clients on a case-by-case basis and will provide one of a range of responses dependent on the situation. These may include:

- Requiring another service (e.g., Alcohol and Drug substance use or mental health) – staff will contact relevant services as required
- Disruptive or violent behaviour – managed by security staff and contacting Police if needed
- Significant injury or illness – arrange transport to hospital including calling an ambulance.

In all of the above instances, SNS staff and security are to take reasonable steps to prevent the client who is not suitable from remaining in the vicinity of the facility.

Management of Antisocial Behaviour

Antisocial behaviour will not be tolerated both within the facility and in the exterior vicinity of the building. The overall objective is to maintain a safe and disturbance-free environment for staff, consumers, and local residents adjacent to the service.

Measures to support this objective are:

- All clients are required to complete a Rights & Responsibilities form, which outlines our expectation of them and what they can expect from us. We ask that people: Respect others and property, inside and outside of the facility; If for whatever reason clients are not able to do this, they are asked to leave and next time they return, they must meet with a senior worker to discuss and address the behaviour.
- CCTV cameras will cover all main internal areas and the externally areas adjacent to the building.
- Ensure that a minimum of 1 licensed security personnel is on-site during operational hours. They will be stationed in the hub on the ground floor and where possible, will also patrol the exterior of the building periodically during the night. They will also be available to respond to any client incidents that occur either within the building or in the immediate exterior vicinity of the building.
- All SNS staff will be trained in de-escalation techniques.
- Ruah and the SNS will have a formal relationship with WA Police, ensuring responsive support from Police where this may be needed.
- There is an on-call system to provide senior-level support in the event of any incidents.

Loitering, in the context of our community guidelines and service operations at Ruah, is defined as the act of remaining in a particular public place for a protracted time without a clear purpose or activity. This does not include activities such as smoking, waiting for services, or being outside the building for a specific reason, such as having a cigarette.

Ruah is committed to minimising loitering around the facility. We recognise, however, that clients may be present outside the building as they wait for services or partake in smoking. Staff and security will manage and monitor this to ensure safety for all.

By distinguishing between loitering and the legitimate use of outdoor space by our clients, we aim to maintain a respectful and orderly environment while also being mindful of the needs and behaviours of those we serve.

5. Local Engagement and Complaints

Engagement with Local Businesses and Residents

The facility is situated in an area that contains a number of existing businesses and residents.

The services in this facility have been designed to co-exist with the local community and to play a positive part in improving the amenity and safety of the area. Ruah is committed to ensuring there is no antisocial behaviour in the vicinity of the building and will ensure appropriate management of the surrounding area. Strategies such as security patrols, lighting, CCTV, and procedures to minimise disruptions after-hours are part of the approach to managing this important relationship.

Complaints Management

As part of operating this facility we take in complaints as a part of the quality improvement process. Listening and early communication is key to resolving concerns with clients, neighbours, and the community. Complaints (which could be in connection to a client or the services that Ruah provides) can be made via the feedback form via the website, calling 13 RUAH (who will direct the complaint to the appropriate service/area), or emailing connecting@ruah.org.au or feedback@ruah.org.au.

Regarding after hours issues for the service or surroundings, the community are encouraged to call City Watch or the Police if the matter is urgent.

Ruah welcomes all feedback as an integral part of continuous quality improvement and will endeavour to resolve complaints in connection to the services that Ruah provides. There may be issues outside our control, for example issues that occur not on Ruah property but that in some way are related to Ruah, thus as part of the complaint management process, we would make reasonable efforts to resolve issues with stakeholders involved. We are reviewing our complaints management process which ensures that complaints are risk rated and escalated according to seriousness and frequency.

Further to this, Ruah have designed and will display signage that will outline where to direct feedback during operational hours.

Engagement with Local Residents for the SNS

The facility is located within a mixed-use area that includes residential properties. Recognising the importance of harmonious coexistence with our neighbours, the SNS service has been conscientiously designed to enhance the local community's safety and amenity. Our management strategies include the implementation of security patrols, enhanced lighting, and CCTV systems to foster a secure environment. Additionally, we have established protocols to minimise any potential disturbances during the after-hours operation of our services.

As part of our commitment to community engagement, we will initiate the formation of a SNS Community Advisory Group (for James Street). This group will serve as a platform for continuous dialogue and collaboration with local residents and stakeholders. The group's terms of reference have not been formally set, but are likely to encompass:

- Disseminating information about the SNS service and discussing matters that may affect both the SNS and the local community.
- Engaging in consultation regarding operational aspects of the SNS that could potentially influence the residents' quality of life.
- Providing a channel through which community concerns can be communicated, addressed, and tracked systematically.

Through these measures, we aim to ensure that the SNS is not only a safe place for our clients but also a responsible and responsive neighbour to the residents of the area.

6. Review

This document will undergo regular reviews (at least annually) to remain aligned with evolving community needs and service delivery standards. Significant changes will be communicated to relevant stakeholders, then submitted to the City of Perth.



City of Perth

Minutes

Ordinary Council Meeting

27 February 2024

Michelle Reynolds
Chief Executive Officer
1 March 2024

Minutes to be confirmed at the next Ordinary Council Meeting

These minutes are hereby certified as confirmed.

Presiding member's signature _____

Date _____

Reason for Change:

Having had the opportunity to hear our community last week, we took the opportunity to not only welcome them but thank them for their courage for coming forward and highlighting concerns. One of the consistent themes that we heard was the importance of security to be stationed at all times, during in particular, the Safe Night Space operation if indeed that did proceed.

We've also heard from our community a desire and a want to be able to be engaged and to engage via the City of Perth with RUAH who are coordinating and running the Safe Night Space facility. It's sensible that our community most impacted in the James Street area have that ability to be able to raise any concerns or issues of performance where perhaps standards have slipped as can happen from time to time.

Council Resolution (OCM-24/02-005)

Mover: Lord Mayor Basil Zempilas

Seconded: Councillor Brent Fleeton

That Council, in accordance with the provisions of the City Planning Scheme No. 2, the Metropolitan Region Scheme and the *Planning and Development (Local Planning Scheme) Regulations 2015 – Deemed Provisions for Local Planning Schemes*, APPROVES the application for a proposed Temporary Safe Night Space for Women (Community Centre) at 247-249 James Street, Northbridge as indicated on the Metropolitan Region Scheme Form One dated 7 December 2023 and as per plans and details received on 11 December 2023 subject to:

1. The Safe Night Space for Women only operating from 7:00pm to 7:00am seven days a week.
2. The Safe Night Space for Women having a limited approval period of 30 months from the date of this determination, after which time the use must cease to the satisfaction of the City.
3. Prior to the commencement of the Safe Night Space, an updated Operational Management Plan, that includes:
 - a. a provision to require the presence of one (1) security personnel to be positioned external to the building at all times that the Safe Night Space is operational; and
 - b. specific provisions to engage with the Northbridge Neighbourhood Group on a regular basis to discuss any potential issues relating to the operation of the Safe Night Space and measures to resolve these issues

must be submitted to and approved by the City. The Safe Night Space being managed and operated in accordance with the approved Operational Management Plan at all times to the satisfaction of the City.

4. Prior to the commencement of the Safe Night Space, an updated Waste Management Plan shall be submitted to and approved by the City providing the following:
 - a. Specify what measures are being taken to mitigate the disposal of illegal items.
 - b. Specify what measures are being taken to mitigate biohazard items.

with the approved Waste Management Plan being implemented at all times by the operator/manager, to the satisfaction of the City.

CARRIED UNOPPOSED (9/0)

For : Lord Mayor Basil Zempilas; Deputy Lord Mayor Clyde Bevan; Councillors Brent Fleeton, Liam Gobbert, Viktor Ko, Catherine Lezer, Raj Doshi, David Goncalves and Bruce Reynolds

Against : Nil

Background, orders sought and grounds of review

Background

- 1 Ruah Community Services Ltd (**Ruah**) is an independent, not-for-profit organisation that has provided community services in Perth for sixty-five (65) years.
- 2 Amongst other matters, Ruah is accredited against the National Safety and Quality Health Service Standards (second edition) and has a National Mental Health Standards Certificate of Accreditation.
- 3 Ruah operated what is described as a 'Safe Night Space for Women' at the Rod Evans Community Centre from May 2021 to November 2023.
- 4 A 'Safe Night Space for Women' provides safety and shelter for women in crisis through the provision of an emergency overnight safe space. This space is for those who are in a situation of violence or escaping domestic violence and with no other place to go end up sleeping rough.
- 5 Ruah now proposes to operate a 'Safe Night Space for Women' at 247-249 James Street, Northbridge.
- 6 By way of applications dated 8 December 2023, approval was sought from the City of Perth (**City**) under the *City of Perth City Planning Scheme No.2* and the *Metropolitan Region Scheme* for the proposed 'Safe Night Space for Women' at 247-249 James Street, Northbridge (together **Application**).
- 7 The Application was conditionally approved by the Council of the City at its meeting on 27 February 2024 (**Approval**), with the conditions of the Approval being as follows:

1 The Safe Night Space for Women only operating from 7:00pm to 7:00am seven days a week.

2 The Safe Night Space for Women having a limited approval period of 30 months from the date of this determination, after which time the use must cease to the satisfaction of the City.

3 Prior to the commencement of the Safe Night Space, an updated Operational Management Plan, that includes:

- a. a provision to require the presence of one (1) security personnel to be positioned external to the building at all times the Safe Night Space is operational; and
- b. specific provisions to engage with the Northbridge Neighbourhood Group on a regular basis to discuss any potential issues relating to the provision of the Safe Night Space and measures to resolve those issues

must be submitted to and approved by the City. The Safe Night Space being managed and operated in accordance with the approved Operational Management Plan at all times to the satisfaction of the City.

4 Prior to the commencement of the Safe Night Space, an updated Waste Management Plan shall be submitted to and approved by the City providing the following:

- a. Specify what measures are being taken to mitigate the disposal of illegal items.
- b. Specify what measures are being taken to mitigate biohazard items.

with the approved Waste Management Plan being implemented at all times by the operator/manager, to the satisfaction of the City.

Orders sought

8 The Applicant seeks the following orders:

- 1 The application for review is allowed.
- 2 Condition 2 of the Approval is amended by deleting ‘, after which time the use must cease to the satisfaction of the City’.
- 3 Condition 3 of the Approval is replaced with the following worded condition:

The Safe Night Space for Women being managed and operated at all times in accordance with the *attached* Operational Management Plan dated 4 March 2024.

- 4 Condition 4 of the Approval is replaced with the following worded condition:

The *attached* Waste Management Plan dated 22 December 2022 being implemented at all times.

Grounds of review

Condition 2

- 9 The words ‘after which time the use must cease’ are redundant. It is otherwise clear from condition 2 that upon the cessation of 30 months from the grant of the Approval, the ‘Safe Night Space for Women’ no longer has approval to operate and therefore must cease.

With the deletion of the words 'after which time the use must cease', the words 'to the satisfaction of the City' no longer serve any purpose and should be deleted as well.

- 10 If the words 'after which time the use must cease' are to remain, the words 'to the satisfaction of the City' mean that condition 2 is uncertain and lacking finality.
- 11 The words 'to the satisfaction of the City' result in condition 2 being uncertain because they have the effect that at the time of the Approval being granted what constitutes the cessation of the use is not certain.
- 12 The words 'to the satisfaction of the City' result in condition 2 lacking finality because they have the effect that at the time of the Approval being granted what constitutes the cessation of the use is subject to a future determination by the City.
- 13 Furthermore, the cessation of the use is a simple, objective concept and is not dependent on the opinion, 'or satisfaction', of the City. Either the use has ceased or it has not, irrespective of the opinion, 'or satisfaction', of the City.

Condition 3

Proposed wording of condition 3

- 14 The *attached* Operational Management Plan dated 4 March 2024 (*attached* OMP) appropriately deals with all necessary operational management measures in respect of the 'Safe Night Space for Women' at 247-249 James Street, Northbridge.

Current wording of condition 3

- 15 There is no need for ‘the presence of one (1) security personnel to be positioned external to the building at all times the Safe Night Space is operational’.

Security, including the management of behaviour, is appropriately and thoroughly dealt with in the *attached* OMP. For example, in the context of the exterior of the building:

- a) ‘When not actively working with clients or supporting the service, at times when only surveillance is required security staff are strategically positioned inside the hub’s entrance, allowing for a clear view of the building’s front and immediate surroundings.’¹
- b) ‘Ruah alerts City Rangers for any issues in the surrounding areas and engages police assistance for any illegal activities.’²
- c) ‘Security personnel conduct hourly checks inside, outside, and around the sides of the building as a core part of their duties, and are responsible for reporting any illegal activity to the police.’³
- d) ‘Monitoring and Patrols – Security staff are tasked with monitoring client behaviour both within and external to the premises, conducting regular patrols to maintain order and address any potential disturbances.’⁴
- e) ‘CCTV cameras cover all main internal areas and the externally (sic) areas adjacent to the building.’⁵
- f) ‘We have recently installed additional lighting to further increase visibility and therefore increase safety around the area’.⁶
- g) ‘The Safe Night Space (SNS) service includes a mechanism specifically designed for addressing community concerns related to the service during its operational hours. This system enables the community to alert SNS

¹ Page 8 of the *attached* OMP.

² Page 10 of the *attached* OMP.

³ Page 12 of the *attached* OMP.

⁴ Page 12 of the *attached* OMP.

⁵ Page 14 of the *attached* OMP.

⁶ Page 17 of the *attached* OMP.

staff via text about situations such as a perpetrator outside the building or any other service-related issues. Upon receipt of such alerts, the staff will assess the situation to decide whether the involvement of Police or City Rangers is warranted. A designated phone line is established to receive these text messages, ensuring that community concerns are promptly addressed.⁷

- 16 Condition 3 is uncertain insofar as it refers to the 'Northbridge Neighbourhood Group'. Who or what the 'Northbridge Neighbourhood Group' is, is unknown and not defined in condition 3.
- 17 There is no need for engagement with the 'Northbridge Neighbourhood Group'.

Community complaints, feedback and engagement are appropriately and thoroughly dealt with in the *attached* OMP. For example:

- a) 'Complaints Policy and Procedures: Our policy outlines the specific steps to be followed when a complaint is lodged. It defines the process for escalating issues and ensures that every complaint is given due attention.'⁸
- b) 'As part of operating this facility we take in complaints as part of the quality improvement process. Listening and early communication is key to resolving concerns with ... neighbours, and the community. Complaints (which could be in connection to a client or the services that Ruah provides) can be made via the feedback form via the website, calling 13 RUAH (who will direct the complaint to the appropriate service/area), or emailing connecting@ruah.org.au or feedback@ruah.org.au.'⁹
- c) '**Feedback Evaluation:** Upon receiving the community's insights, suggestions, or observations, Ruah undertakes a careful evaluation to determine how this feedback might inform service adjustments...

⁷ Pages 17 and 18 of the *attached* OMP.

⁸ Page 12 of the *attached* OMP.

⁹ Page 15 of the *attached* OMP.

Service Adaptation: If the assessment of feedback reveals actionable opportunities, Ruah explores how the service can be altered or adapted. This process is conducted with the aim of enhancing service outcomes, ensuring that any modifications are implemented thoughtfully and strategically to benefit the community and service objectives.¹⁰

d) 'Ruah have established the Community Advisory Group for James St, appointing Ms. Liz MacCleod as the groups independent chair. The Community Advisory Group serves as an advisory body to Ruah's Chief Executive, facilitating open discussions and sharing insights to inform decisions regarding the SNS. The Community Reference (sic) Group will meet with the intention to achieve the following objectives:

...

- Provide a platform for addressing concerns or exploring opportunities identified by the broader community, aiming to devise creative and responsible solutions that align with the service's objectives.

...

- Focus on collective solution-finding to unblock difficulties, enhancing community outcomes and ensuring the delivery of the service aligns with the needs and positives outcomes for the community, clients, and the service itself ...
- Develop strategies to enhance the integration of the SNS and the James Street hub within the community, fostering stronger connections and collaboration.

... Members include ... City of Perth representatives, community and neighbour representatives ... The group conducts regular reviews of its composition to ensure alignment with service goals and community needs.

Members attend and participate in meetings, representing community views ...¹¹

¹⁰ Page 15 of the *attached* OMP.

¹¹ Pages 16 and 17 of the *attached* OMP.

- 18 The required updating of the 'Operational Management Plan' and approval by the City results in condition 3 being uncertain and lacking finality.
- 18.1 The required updating of the 'Operational Management Plan' and approval by the City results in condition 3 being uncertain because they have the effect that at the time of the Approval being granted the content of the approved Operational Management Plan is not certain.
- 18.2 The required updating of the 'Operational Management Plan' and approval by the City results in condition 3 lacking finality because they have the effect that at the time of the Approval being granted the content of the approved Operational Management Plan is subject to a future determination of the City.
- 19 The words 'to the satisfaction of the City' mean that condition 3 is uncertain and lacking finality.
- 19.1 The words 'to the satisfaction of the City' result in condition 3 being uncertain because they have the effect that at the time of the Approval being granted what constitutes compliance with the approved Operational Management Plan is not certain.
- 19.2 The words 'to the satisfaction of the City' result in condition 3 lacking finality because they have the effect that at the time of the Approval being granted what constitutes compliance with the approved Operational Management Plan is subject to a future determination of the City.
- 20 Management and operation of the use in accordance with the approved Operational Management Plan is a simple, objective concept and is not dependent on the opinion, 'or satisfaction', of the City. Either the use has been managed and operated in accordance with the approved Operational

Management Plan or it has not, irrespective of the opinion, 'or satisfaction', of the City.

Condition 4

Proposed wording of condition 4

- 21 The *attached* OMP and the *attached* Waste Management Plan dated 22 December 2022 appropriately deal with all necessary waste management measures in respect of the 'Safe Night Space for Women' at 247-249 James Street, Northbridge.

Current wording of condition 4

- 22 Condition 4 lacks certainty as the meaning of the terms 'mitigate the disposal of illegal items' and 'mitigate biohazard items' is not known.
- 23 Assuming the 'Waste Management Plan' is the *attached* Waste Management Plan dated 22 December 2022, there is no need for that plan to be updated by specifying 'what measures are being taken to mitigate the disposal of illegal items'.

Leaving aside the issue of what 'mitigate the disposal of illegal items' means, the handling of illegal items is appropriately and thoroughly dealt with in the *attached* OMP. For example:

- a) 'Handling of Illegal Items: Any illegal items found are promptly surrendered to WAPOL, aligning with our commitment to safety and legality.'¹²

¹² Page 10 of *attached* OMP.

- 24 Assuming the 'Waste Management Plan' is the *attached* Waste Management Plan dated 22 December 2022, there is no need for that plan to be updated by specifying 'what measures are being taken to mitigate biohazard items'.

Leaving aside the issue of what 'mitigate biohazard items' means, the management of biohazards is appropriately and thoroughly dealt with in the *attached* OMP. For example:

- a) 'Security will conduct hourly patrols as part of their shift schedule, covering the ... external side of the building, and the area directly outside the front of the building, ensuring that any hazards are identified, removed, and properly disposed of.'¹³
- b) 'Biohazard Management: On-site biohazard bins, focusing on sharps disposal, are maintained. Staff receive extensive training in the safe handling of sharps and biohazardous waste.'¹⁴
- c) 'Staff Training: Comprehensive training on biohazard management is provided, ensuring staff are well-equipped with knowledge on safe disposal practices and the use of PPE.'¹⁵

- 25 The required updating of the 'Waste Management Plan' and approval by the City results in condition 4 being uncertain and lacking finality.

25.1 The required updating of the 'Waste Management Plan' and approval by the City results in condition 4 being uncertain because they have the effect that at the time of the Approval being granted the content of the approved Waste Management Plan is not certain.

25.2 The required updating of the 'Waste Management Plan' and approval by the City results in condition 4 lacking finality because they have the effect that at the time of the Approval being granted the content of the

¹³ Page 8 of the *attached* OMP.

¹⁴ Page 10 of *attached* OMP.

¹⁵ Page 10 of *attached* OMP.

approved Waste Management Plan is subject to a future determination of the City.

26 The words 'to the satisfaction of the City' mean that condition 4 is uncertain and lacking finality.

26.1 The words 'to the satisfaction of the City' result in condition 4 being uncertain because they have the effect that at the time of the Approval being granted what constitutes compliance with the approved Waste Management Plan is not certain.

26.2 The words 'to the satisfaction of the City' result in condition 4 lacking finality because they have the effect that at the time of the Approval being granted what constitutes compliance with the approved Waste Management Plan is subject to a future determination of the City.

27 Implementation of the approved Waste Management Plan is a simple, objective concept and is not dependent on the opinion, 'or satisfaction', of the City. Either the Waste Management Plan has been implemented or it has not, irrespective of the opinion, 'or satisfaction', of the City.

Attachments

28 Operational Management Plan dated 4 March 2024.

29 Waste Management Plan dated 22 December 2022.

Ruah Safe Night Space for Women Operational Management Plan

Status: 04 March Amendments

CONFIDENTIAL

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1. Background

This Management Plan supports the Development Application for 247 James Street, Northbridge as a Safe Night Space for Women. This proposed service would exist alongside the existing Engagement Hub, which is already in operation on the site.

1.1. About Ruah

Ruah Community Service has been providing services to vulnerable Western Australians for more than 60 years. In the last five years, Ruah led the successful '50 Lives 50 Homes' project, Western Australia's first Housing First initiative and collective impact project that provided sustainable housing and support to more than 160 vulnerable people. Following the success of this initiative, Ruah has been awarded the Housing First Homelessness Initiative System Coordinator function (HFSC), providing overall coordination to the Department of Communities: Housing First Homelessness Initiative (HFHI).

Ruah's manifesto is cited below:

"We believe we are all better off, as a community, as a society, if we are all connected. We need the disconnected and the vulnerable as they need us. They are us. We, but for advantages of birth or circumstance, are them – human hearts, in need of human connection and meaning in their lives. There is more that unites us than divides us, yet the most disadvantaged are stigmatised, without a voice for change. Change does not come easily. We take our legacy and inspiration from the bold, courageous individuals from as far back as the 17th century doing what nobody else dared. Not because it was asked of them but because it was right, and it was needed. Today Ruah will not meander in our pursuit of measurably transforming lives. We go boldly toward not just helping people experiencing homelessness but ending homelessness. Ending domestic violence. Changing the lives and creating opportunities for those experiencing mental health issues. We choose to work with the most vulnerable, the most challenged – because it's difficult, because this makes a difference."

Ruah delivers high quality wrap around supports to more than 3,000 people a year in the areas of mental health, housing, homelessness, family and domestic violence and community legal services. Our model of care (our roadmap to how to deliver services to our clients) operates through a 'no wrong door' approach. Whichever pathway people enter our services they can access the supports they need when they need them.

Our capacity to help change the lives of the people we work with is underpinned by strong corporate and clinical governance frameworks and processes– built from supporting people at a grassroots level and accredited against the National Safety and Quality Health Service Standards and National Standards for Mental Health Services.

Ruah is an independent, not-for-profit organisation lead by an experienced Board and Executive. We are driven to make a difference for people who are vulnerable, disadvantaged and discriminated against.

In 2021 Ruah implemented its innovative and ambitious new project; Ruah's Model of Care.

Our Mode of Care guides our staff on how to support our clients through their journey of change while also making specialist support, such as child psychology and financial counselling, easily accessible. Implementing our Model of Care became more significant as Covid 19 placed additional demands and hardships on the clients we serve, but we used this added complexity as the motivational driver to successfully implement our model which will now in place to best serve our clients for decades to come.

How we support people through their journey of change moves from the traditional one-on-one support worker model to a team approach, where each client has unfettered access to the supports they need, from key workers, support workers and specialists who can walk beside them as they navigate their way from being 'stuck' through to "believing", "trying", "learning" and, ultimately, "self-reliance" – based on the Outcomes Star Journey of Change model. That might also mean accessing support and services from across Ruah – a 'no wrong door' approach. Someone experiencing homelessness as a result of family violence might also access mental health support services and even legal advice and support (through Ruah Legal Services) as part of their

journey of change. The people with whom we work and whom we support experience our breadth of services as 'One Ruah.'

2. Overview- Ruah Safe Night Space for Women

The Ruah Safe Night Space for Women (SNS) will exist at the same facility as the existing Ruah Engagement Hub (REH). Each provides a different, but complementary service.

1. A **Safe Night Space for Women** provides safety and shelter for women in crisis through the provision of an emergency overnight safe space. This space is for those who are in a situation of violence or escaping family domestic violence and with no other place to go end up sleeping rough.
2. The existing **Ruah Engagement Hub** offers holistic support to those experiencing homelessness with a linkage to support services and engagement workers.

A part of this facility is already in operation (the REH), while the other service (the SNS) which was operating successfully at the Rod Evans Centre from May 2021 up until the end of November 2023, is planned to begin operation as soon as practical, and other preparations including staff recruitment and training have been completed.

2.1 The role of the Safe Night Space

Information on the role of the SNS is described below:

1. Ruah was awarded the Safe Night Space by the CoP, to respond to the urgent need for a safe and culturally secure night space for women who are escaping violence or family and domestic violence who have no other place to go and end up sleeping rough.
2. The service model and planning presented was based on Ruah's 60+ years' experience supporting people experiencing homelessness and women escaping family and domestic violence in Perth. During Homelessness Week 2019 Ruah piloted a SNS for women from the Ruah engagement hub located at James Street, Northbridge.
3. The aim of the service is to provide a safe and culturally secure night space for women escaping violence or in situations of extreme vulnerability in Perth.
4. It is accessible to women during the evenings, seven days a week 365 days per year, and has capacity for thirty women a night. From our experience the demand in winter is higher and therefore due to weather events such as hot conditions or extreme winter conditions the opening hours are adapted to ensure safety of women escaping crisis.
5. Women who access SNS ordinarily are escaping family and domestic violence who would otherwise face being forced onto the streets; women awaiting placement in transitional or long-term accommodation and may include chronically street present women. The specific criteria include:
 - 5.1 Women over the age of 18+
 - 5.2 Women escaping family and domestic violence who would otherwise face being forced onto the streets.
 - 5.3 Women awaiting placement in transitional or long-term accommodation.
 - 5.4 Women who have not exceeded their placement time.
 - 5.5 Women who are street-present (rough sleepers).

6. The SNS operates with a low threshold approach, which places minimal demands on the people who use the services. It offers services without attempting to control people's life choices, offering harm minimisation and support to engage with further services and supports when requested.
7. The SNS takes referral from other agencies, emergency services and walk-ins. Our in-depth understanding of rough sleepers in the cohorts addressed by the proposed services, in conjunction with our service data, has informed our referral modelling.
8. Building upon our two years of successful operation at the SNS at Rod Evans and our services at James St, we will continue to refine our approach to managing non-admittance. We will outline the comprehensive steps we have established for redirecting individuals to alternative accommodations. Our experience has enabled us to successfully support people through a variety of options, including the Noongar Patrol, Street chaplains, the HEART team, and providing taxis to safe locations for family or friends. We maintain strong links with partner organizations and agencies, including WAPOL, ensuring a collaborative and supportive network for those in need.
9. The SNS model is dynamic, designed to be scalable and responsive to fluctuating demands and crises, such as extreme weather, health emergencies, or other situational challenges. Our adaptability allows us to provide the best possible service within our means, continually striving to expand our capabilities to avoid having to turn individuals away.
10. The services are be operated in a manner that ensures maximum utilisation so that as many rough sleepers as possible can be off the streets and then supported into housing. We draw on our experience in running services for vulnerable people and continue to actively link with other services in the evenings to fill all available spaces.
11. For the identified cohorts, the priority is safety from the streets. Most chronic rough sleepers on the streets of Perth are connected in with services such as engagement hubs. After safety, a secondary goal for this cohort is to promote positive outcomes in which people can work with case workers, engage in linked services, and be supported into permanent housing.
12. This group, once housed, reduced the demand for the service and allow additional people into the service. People who do not wish to engage in formal support, are newly homeless or are from another area and will access the SNS through the self-presenting or emergency pathway.

3. Operation of the SNS facility

The SNS is staffed with Ruah workers from 6:30pm to 7:30am each night. Clients can use the service between 7pm and 7am. Based on our experience, we note that demand increases during winter; hence, opening hours may slightly adapt in response to extreme weather conditions, such as heatwaves or severe winter weather, to ensure the safety of women escaping crisis.

This structure guarantees the presence of four staff members on-site at all times whilst SNS is operating and is, crucial for maintaining safety and managing risk effectively. In peak times or high-demand situations, we activate our on-call process to quickly mobilize additional staff and leadership, including Ruah's Senior Clinical Project Lead (SCPL), demonstrating our dynamic and responsive approach to staffing, refined over two years of operating the SNS model.

Ruah staff are well-qualified, receiving ongoing training and supervision, and bring extensive sector experience. Evening support is bolstered by Ruah's internal on-call management, while the Housing & Homelessness Leadership Team and the SCPL provide additional support during usual business hours.

Our staffing mix is designed to ensure safe and efficient client flow and intake processes, reflecting our deep understanding of our clientele and commitment to their safety. The Ruah team configuration includes:

The Ruah team consists of:

1. Ruah leadership team & dedicated Senior Clinical Project Lead
2. Staff who are dedicated and always stationed onsite during service opening hours:
 - Presence of 2 security personnel at all times whilst the SNS is operating, who are involved in the intake process and work with clients through the evening alongside the Ruah team.
 - Two Ruah workers are onsite at all times between 630pm-730am each day of SNS operation.
3. Additional workers visit to provide specific activities and supports such as medical workers, volunteer support workers, are additional to this core model and support with group activities, at times counselling or specific supports as required.

Our senior leadership team actively supports our staff by participating in team meetings and being available for targeted support or training. This involvement is crucial for operational success, ensuring staff feel supported and that service delivery meets the highest standards. The proactive engagement of our leadership also enables a swift and effective response to emerging needs or challenges, underscoring our dedication to safety and excellence in client service.

4. Security Management

We have developed a comprehensive response protocol for our security team, addressing incident escalation, site hygiene, external noise management, litter, and abandoned belongings, which are integrated into our management plan:

1. Incident escalation: We have developed a comprehensive response protocol which our SNS work to, this includes processes around incident management environmental management of the service and site. Incident Escalation: Our security personnel are trained to assess situations and escalate incidents according to severity. This may involve direct communication with our management team, engagement with local services, or contacting WAPOL when necessary. On the hour checks and presence will be conducted by security.
2. Site Hygiene: Ruah is responsible for the cleanliness and upkeep of the premises at 247 James St, with staff and contractors assigned various duties to ensure the property is well-maintained. Additionally, Ruah will collaborate with City Rangers, alerting them to any issues in the surrounding area and calling on police assistance for any illegal activities or serious concerns for safety of either clients, staff or the community.
3. External Noise Management: The team actively works to minimise noise disruptions, implementing strategies such as designated quiet hours.
4. Litter and Abandoned Belongings: Our staff follows a clear process for managing litter and belongings left behind within the Safe Night Space. The security role supports in overseeing and ensuring the safety of excess luggage, when a woman is inside the Safe Night Space. The services has a mechanism to ensure safe luggage storage while a woman is using the service each night. Any items left at the service which are not claimed will be removed and disposed of.
5. Unauthorised Individuals: For individuals who should not be at the premises, we utilise a de-escalation process and our security work instructions, which have been developed in conjunction with our security team. This includes ongoing joint training sessions to ensure maximum safety and understanding of when to engage WAPOL for additional support.

Our approach is designed to provide maximum safety and efficiency, ensuring a responsive and responsible security presence at all times. Through continuous training and collaboration with our security team, we maintain a high level of preparedness to address any security concerns that may arise within the facility.

4.1 Security- Role and Responsibilities

1. Subcontracted Security Services – Security personnel are subcontracted to ensure professional, efficient, and effective service.
2. Primary Duties – The core responsibility of our security team is to maintain safety within the facility. Their roles encompass surveillance, risk mitigation, and incident management.
3. Client-Staff Relationship – Based on our experience, we recognise the importance of a positive relationship between the security team and our clients, particularly those who are rough sleepers. Fostering a harmonious environment is crucial for the effective operation of our services.
4. Induction and Familiarisation – Ruah conduct thorough inductions for all security personnel to familiarise them with the facility's procedures, environment, and regular clients.

4.2 Training and Licensing Requirements

1. All security staff must hold a valid license in accordance with the Security and Related Activities (Control) Act 1996 and the Security and Related Activities (Control) Regulations 1997.

4.3 Security protocol

The security protocol is designed to ensure a safe and secure environment for both clients and staff, fostering trust and respect within the facility. We have taken a multi-faceted approach to security concerns by integrating a series of proactive measures into our management plan to ensure the safety and orderliness of SNS:

1. The SNS team have an established positive working relationship with the City Watch team and rangers facilitating quick and effective communication. They work closely with Police, Ambulance and other supportive services used as required,
2. Our security personnel are required to remain on-site between the critical times of service opening and service closure.
3. We have instituted a mandatory policy where all individuals must sign an agreement of rights and responsibilities before entering the space, with a time-out procedure for non-compliance.
4. Extra signage will be installed to clearly communicate the rules and regulations, the presence of security measures, and the consequences of disregarding the established code of conduct.

Furthermore, the City of Perth's website serves as a resource for broader community services and facilities, offering comprehensive information on security and surveillance, accessible at the following link: [City of Perth Security and Surveillance](#).

4.4 Community Safety

For issues beyond our immediate SNS environment, we have established protocols to address community-related concerns:

1. Safe City: For assistance, call 9461 3333.

2. WA Police: For general assistance, call 131 444.
3. Emergency Services: In an emergency involving Police, Fire, or Ambulance, dial 000.
4. Crime Stoppers: To report crime anonymously, call 1800 333 000.

These integrated steps and resources reinforce a secure environment and uphold the highest standards of safety for both our clients and staff. Our ongoing commitment to proactive security management is reflective of our dedication to creating a supportive and secure space for everyone involved in our services.

5. Building management

5.1 Access to the Building

We have established a secure and effective system for monitoring building access, which incorporates a combination of technological and strategic measures:

1. Continuous visual surveillance is maintained through operational CCTV systems, enhancing overall site safety.
2. The architectural design of the building is intentionally crafted to maximise visual surveillance capabilities. This, together with the presence of our trained security personnel and workers, ensures a high level of safety, mirroring the successful approaches used at our Rod Evans and James St facilities.
3. The building features a funnel entry design, serving a dual purpose of controlling the flow of people and allowing for the thorough triage and assessment of individuals. This setup is key to ensuring that all clients understand and adhere to their rights and responsibilities upon entry.
4. Security will conduct hourly patrols as part of their shift schedule, covering the interior, external side of the building, and the area directly outside the front of the building, ensuring that any hazards are identified, removed, and properly disposed of.
5. When not actively working with clients or supporting the service, at times when only surveillance is required security staff are strategically positioned inside the hub's entrance, allowing for a clear view of the building's front and immediate surroundings.
6. After our 7 am closure, clients are advised to move to day services, one of which is the Tranby homelessness engagement hub close by in Northbridge which opens at 7am, where women can find further support and services.

5.2 Entry and Exit at the James St Site

Client access is managed solely through the front door, which serves as the only entry point, thus simplifying security oversight. The James St facility features two access points:

1. Main Entrance: To enhance service efficiency and manage client flow effectively, clients are encouraged to coordinate with designated hubs during the day and present to the SNS between 7pm-10pm for planned visits. The main entrance, situated at the front on James Street, is intended for client use and will be managed by security officers at a reception, triage desk. This allows for a space where we assess risks and speak about rights and responsibilities in the service. This measure allows us to focus on emergency presentations after 10pm, ensuring that staff can dedicate the necessary attention to clients with present in emergency situations with urgent and complex needs. Encouraging early presentation supports the

safety and smooth operation of the service, helping to manage the flow of clients efficiently throughout the evening.

2. **Staff Entrance:** Situated in the rear car park, this entrance is exclusively for staff access and requires swipe card authentication. Staff may also enter through the Main Entrance using the swipe card system.

Together, these measures constitute a comprehensive security system, ensuring the safe access and departure of clients while fostering a secure environment for all who use our services.

5.3 Parking Provisions

1. We acknowledge that there is no street parking available directly across from the SNS, as these are reserved for WAPOL vehicles.
2. Individuals who may need to rest in their cars often make use of public parking bays or paid parking facilities located nearby.
3. Based on our operational experience at the Rod Evans centre, incidents involving individuals resting in cars near the facility have been minimal and have not constituted a significant concern.
4. We will ensure that our Rights and Responsibilities documentation clearly communicates expectations regarding the use of surrounding parking areas. Security will conduct hourly patrols as part of their shift schedule, covering the interior, external side of the building, and area directly outside the front of 247 James St. Illegal behaviour and safety concerns will be reported to the Police. Part of this role includes, providing guidance and assistance to ensure individuals are aware of parking protocols and maintaining a secure environment for all.
5. **Client Transportation:** Most clients are expected to utilise public transport or walk to the facility. Clients with vehicles are advised not to park directly in front of or adjacent to the facility. They are directed to alternative parking options in the nearby James Street and wider Northbridge area, with staff providing information on more affordable parking solutions.
6. **Staff Parking:** limited designated, secure parking for staff is available at the rear of the building.

Through proactive engagement and clear communication, we aim to uphold a respectful coexistence with those who use nearby parking while ensuring the safety and well-being of our clients and the local community.

5.4 Deliveries and Suppliers

1. **Parking for Deliveries:** Suppliers and delivery personnel use the rear parking area of the building.
2. **Delivery Access:** They are required to present themselves at the Main Entrance. Deliveries generally consist of general office supplies and food items.

5.5 Servicing and Cleaning Plan

Our James St facility upholds a high standard of cleanliness and safety, reflecting the established protocols at Rod Evans:

1. **Hybrid Cleaning Approach:** Our in-house staff manage routine operational cleaning, including the kitchen and common areas, ensuring attentive and consistent day-to-day maintenance.

2. **Contracted Cleaning Services:** Professional cleaning services are utilised for deep cleaning and specialised tasks, ensuring the facility meets the highest hygiene standards through regular and comprehensive cleaning sessions.
3. **Rubbish Management:** Personal responsibility for rubbish disposal is supported, with additional general waste bins requested from the City of Perth (CoP) to enhance this process.
4. **Handling of Illegal Items:** Any illegal items found are promptly surrendered to WAPOL, aligning with our commitment to safety and legality.
5. **Biohazard Management:** On-site biohazard bins, focusing on sharps disposal, are maintained. Staff receive extensive training in the safe handling of sharps and biohazardous waste.
6. **Periodical Pressure Cleaning:** Ruah staff and contractors undertake scheduled duties on all shifts, including daily checks to maintain the building's cleanliness, periodic pressure cleaning, window cleaning, and general maintenance.
7. **Staff Training:** Comprehensive training on biohazard management is provided, ensuring staff are well-equipped with knowledge on safe disposal practices and the use of PPE.
8. **Exterior Monitoring and Disposal:** Ruah is responsible for the cleanliness and upkeep of the premises at 247 James St, with staff and contractors conducting daily checks of the interior, outside, and exterior areas. Clients are informed that any unclaimed items left inside or outside the premises will be removed and disposed of if not claimed within two days. Ruah alerts City Rangers for any issues in the surrounding area and engages police assistance for any illegal activities.

This holistic approach integrates our proven day-to-day operations with external professional services to provide a clean, hygienic, and safe environment at the James St facility.

5.6 Outdoor Cleaning

Ruah continually monitors the frontage and report on the maintenance of the outdoor areas at the facility. Recognising the importance of a clean environment for all, we are monitoring the public footpath in front of the building. Our staff and security are vigilant in removing any rubbish that may accumulate directly outside our facility to maintain a presentable space for both our clients and the community.

Ruah provides periodically deep cleaning services as needed. Ruah is attentive to the condition of the premises and will continue to remain responsive to any significant issues that may arise. Ruah acknowledges that the maintenance of the footpath falls under the jurisdiction of the City of Perth, and Ruah reports any concerns that may require the City's attention.

6. Risk and Complaint Management

The facility includes a robust framework for managing risks and addressing complaints, ensuring:

1. A safe environment for both clients and staff
2. Transparent and accessible complaint resolution processes
3. Regular reviews of safety protocols and risk management strategies.

6.1 Ruah's Management Approach

Ruah has a robust Quality Assurance system in place that ensures compliance with all Quality Assurance requirements. Organisational and strategic risks are monitored by a Risk and Quality Team, reporting to senior leadership and Ruah's Board through a Risk and Quality Committee (comprised of Executive and Managers)

that meets regularly (at least every six weeks), and a Finance Audit and Risk Committee (comprised of Ruah directors, CFO, CEO, Finance Manager, and Risk and Quality team) which meets bi-monthly.

Ruah uses Microsoft SharePoint systems, which are cloud-based, secure, and can be accessed by all workers for management and control of policies, procedures, and documents; reporting incidents, hazards, feedback, and quality improvements, with automated email notifications and escalation; and auditing.

Ruah's business activities are open, transparent and comply with the City of Perth's Statement of Business Ethics, relevant legislation and the City's policies, procedures, and practices. We employ appropriately qualified workers who demonstrate a high-level of commitment to good process and discipline. Ruah also has a vigorous training culture and promotes individual professional development.

Ruah's financial systems and procedures are continuously reviewed to ensure they are accurate, efficient and fit-for-purpose. Ruah's financial systems are secure and cloud-based, and provide appropriate access for workers, based on positions and security levels.

Ruah is accredited against the National Standards for Mental Health Services and the National Safety and Quality Health Services Standards. Ruah also recently achieved Rainbow Tick Accreditation and anecdotal feedback was that we had set new benchmarks.

Ruah has many strategies in place to mitigate risk and ensure a safe environment for staff, clients, and the community. Ruah is committed to the health and safety of our people and the environment around us.

Our corporate-wide framework straddles our use of the space and is aligned to AS/NZ 31 000:2018 Risk Management Guidelines and includes the following components:

1. Delegation of Authority
2. Risk Appetite Statement, with zero tolerance for safety risks
3. Risk Management Procedure and Process Chart
4. Risk Matrix: supports consistent assessment of risk.
5. Safety Management Procedure
6. Critical Incident Process: reporting, investigation, and review
7. Risk and Quality Committee
8. Organisational Risk Register and Strategic Risk Register

Collectively, the framework ensures that Ruah understands, monitors, and manages the risks associated with the type of work that Ruah does.

7. Specific Management Strategies for the SNS

Ruah addresses the specific areas of concern through the following management strategies:

7.1 Managing Noise and Other Disturbances at the SNS

To maintain a peaceful and respectful environment at the facility, particularly in consideration of our neighbours and the local community, we have implemented a comprehensive strategy to manage noise and other disturbances:

1. Security Personnel Contracting – Ruah employs a team of contracted security personnel, ensuring a professional approach to facility safety and disturbance management. Two security workers are on site at all times during SNS operations. Security personnel conduct hourly checks inside, outside, and around the sides of the building as a core part of their duties, and are responsible for reporting any illegal activity to the police.
2. Monitoring and Patrols – Security staff are tasked with monitoring client behaviour both within and external to the premises, conducting regular patrols to maintain order and address any potential disturbances.
3. Security Licensing – All security personnel are licensed in compliance with the Security and Related Activities (Control) Act 1996, ensuring that they are qualified and trained to handle various situations that may arise.
4. Incident Escalation Procedures – An established procedure is in place for incident escalation, including the management of clients who may refuse to leave the premises, to ensure that any disturbances are resolved in a safe and effective manner.
5. Staff and Security Collaboration – During operational hours, our staff and security team work closely together to promptly address any concerns or disturbances, ensuring a harmonious environment for all.
6. Mandatory Security Presence – At least two licensed security professional is on-site during all operational hours to oversee and manage the facility's environment.
7. Client Responsibilities – All clients are required to agree to a Rights & Responsibilities form upon entry, which outlines expected behaviours and mutual respect for property and individuals, both inside and outside the facility. Clients unable to adhere to these expectations are required to leave and must engage in a discussion with a senior worker upon their return to address their behaviour.

In our continued efforts to minimize antisocial behaviour and disturbances, we have proactively installed clear signage at the front of our premises. This signage, which is prominently displayed on the window, provides guidelines for public incident reporting and outlines the escalation processes. This initiative is part of our ongoing commitment to maintain a secure and community-friendly environment. Through these measures, the SNS aims to effectively manage noise and disturbances, ensuring a safe, respectful, and peaceful environment for clients, staff, and the surrounding community.

7.2 Immediate response protocols for out-of-hours

We have a structured approach to managing complaints, ensuring that all concerns are handled promptly and effectively:

1. Urgent Complaints and Safety Concerns: In situations where there is an immediate concern for safety or other urgent complaints, we advise individuals to directly contact the Western Australia Police (WAPOL).
2. This protocol is in place to ensure that any serious issues are dealt with in the most efficient and appropriate manner, with the assistance of law enforcement when necessary.
3. Complaints Policy and Procedures: Our policy outlines the specific steps to be followed when a complaint is lodged. It defines the process for escalating issues and ensures that every complaint is given due attention.
4. Non-Urgent Complaints: For complaints that do not require immediate attention, complaints (which could be in connection to a client or the services that Ruah provides) can be made via the feedback form via the website, calling 13 RUAH (who will direct the complaint to the appropriate service/area), or emailing

connecting@ruah.org.au or feedback@ruah.org.au. This system can be accessed through the Ruah website and allows for a structured and traceable way to manage and resolve issues.

7.3 Managing Removal of Unwanted or Unattended Personal Belongings

The following measures are in place to manage the removal of unwanted or unattended personal belongings:

1. Clients must agree to our Rights & Responsibilities policy, which emphasises maintaining a clean environment within and around the facility.
2. Clients are expected not to leave rubbish or personal items unattended; non-adherence necessitates a discussion with a senior staff member upon their next visit to address this behaviour.
3. Ruah staff routinely check for and clear any unattended items left in front of the property. Disposal of such items are managed sensitively, with storage options provided for larger belongings.
4. Signage at the front of the property informs clients of our cleanliness standards and the protocol for unattended items, which are subject to removal during regular inspections.

7.4 Management of Congregation and Queuing

The following measures are in place to manage any potential congregation and queuing of clients:

1. Signage directs clients to alternative services during non-operational hours and requests that they refrain from gathering outside the facility when it is closed.
2. Due to local planning laws and regulations, smoking is prohibited around the back of the building. Clients often gather close to the carpark on the side of the building to minimize impact on surrounding private property.
3. During operational hours, security personnel manage client flow and queuing to ensure orderly access to the facility and minimize disruption to the local area. Doors open promptly at 7pm, and clients enter promptly thereafter.
4. Clients who congregate outside are invited in during open hours or asked to move on respectfully. Persistent refusal is handled according to our incident escalation procedure, prioritizing the well-being of all parties involved.

This plan reflects Ruah's commitment to responsible property management, respecting our clients' needs while ensuring the safety and cleanliness of the community space around the facility.

7.5 Management of Clients Not Suitable for the SNS

When clients present to the SNS, it is possible that the service may not be suitable for everyone and their needs. SNS is a low-threshold service, meaning people can come in under the influence of drugs or alcohol, as long as their behaviour does not negatively impact others. It is an open space, not individual rooms, which is also not suitable to everyone's needs and this may be because they have been impacted by trauma and not able to be around other people. Clients may also present unwell or injured and therefore require medical care, including hospital-level care.

Staff assess clients on a case-by-case basis and provide one of a range of responses dependent on the situation. These may include:

1. Requiring another service (e.g., Alcohol and Drug substance use or mental health) – staff contact relevant services as required.
2. Disruptive or violent behaviour – managed by security staff and contacting Police if needed.
3. Significant injury or illness – arrange transport to hospital including calling an ambulance.

In all of the above instances, SNS staff and security are to take reasonable steps to prevent the client who is not suitable from remaining in the vicinity of the facility.

7.6 Management of Antisocial Behaviour

Antisocial behaviour is not tolerated both within the facility and in the exterior vicinity of the building. The overall objective is to maintain a safe and disturbance-free environment for staff, consumers, and local residents adjacent to the service.

Measures to support this objective are:

1. All clients are required to complete a Rights & Responsibilities form, which outlines our expectation of them and what they can expect from us. We ask that people: Respect others and property, inside and outside of the facility; If for whatever reason clients are not able to do this, they are asked to leave and next time they return, they must meet with a senior worker to discuss and address the behaviour.
2. CCTV cameras cover all main internal areas and the externally areas adjacent to the building.
3. Ensure that a minimum of 2 licensed security personnel is on-site during operational hours. They are be stationed in the hub on the ground floor and where possible, also patrol the exterior of the building periodically during the night. They are also available to respond to any client incidents that occur either within the building or in the immediate exterior vicinity of the building.
4. All SNS staff are be trained in de-escalation techniques. Clients who behave in a manner deemed unsafe or fail to comply with our Code of Conduct will be subject to a temporary suspension from our services to ensure the safety.
5. Ruah and the SNS have a formal relationship with WA Police, ensuring responsive support from Police where this may be needed.
6. There is an on-call system to provide senior-level support in the event of any incidents.

Loitering, in the context of our community guidelines and service operations at Ruah, is defined as the act of remaining in a particular public place for a protracted time without a clear purpose or activity. This does not include activities such as smoking, waiting for services, or being outside the building for a specific reason, such as having a cigarette.

Ruah is committed to minimising loitering around the facility. We recognise, however, that clients may be present outside the building as they wait for services or partake in smoking. Staff and security manage and monitor this to ensure safety for all.

To enhance service efficiency and manage client flow effectively, clients are encouraged to coordinate with designated hubs during the day and present to the SNS between 7pm-10pm for planned visits. The main entrance, situated at the front on James Street, is intended for client use and will be managed by security officers at a reception, triage desk. This allows for a space where we assess risks and speak about rights and responsibilities in the service. This measure allows us to focus on emergency presentations after 10pm, ensuring that staff can dedicate the necessary attention to clients with present in emergency situations with

urgent and complex needs. Encouraging early presentation supports the safety and smooth operation of the service, helping to manage the flow of clients efficiently throughout the evening.

By distinguishing between loitering and the legitimate use of outdoor space by our clients, we aim to maintain a respectful and orderly environment while also being mindful of the needs and behaviours of those we serve.

8. Local Engagement and Complaints

8.1 Engagement with Local Businesses and Residents

The facility is situated in an area that contains a number of existing businesses and residents.

The services in this facility have been designed to co-exist with the local community and to play a positive part in improving the amenity and safety of the area. Ruah is committed to ensuring there is no antisocial behaviour in the vicinity of the building and ensure appropriate management of the surrounding area. Strategies such as security patrols, lighting, CCTV, and procedures to minimise disruptions after-hours are part of the approach to managing this important relationship.

Through these strategic engagements and security measures, we are committed to upholding the well-being of the community, ensuring the safe operation of our Hub, and maintaining a harmonious and mutually beneficial relationship with all local stakeholders.

8.2 Complaints Management

As part of operating this facility we take in complaints as a part of the quality improvement process. Listening and early communication is key to resolving concerns with clients, neighbours, and the community. Complaints (which could be in connection to a client or the services that Ruah provides) can be made via the feedback form via the website, calling 13 RUAH (who direct the complaint to the appropriate service/area), or emailing connecting@ruah.org.au or feedback@ruah.org.au.

Regarding after hours issues for the service or surroundings, the community are encouraged to call the Police if the matter is urgent.

Ruah values the community's insights, suggestions, or observations as vital contributions toward the continuous improvement of the Safe Night Space (SNS) service. These forms of feedback provide Ruah with crucial perspectives that may highlight opportunities for service adaptation to enhance outcomes.

Feedback Evaluation: Upon receiving the community's insights, suggestions, or observations, Ruah undertakes a careful evaluation to determine how this feedback might inform service adjustments. This consideration is integral to ensuring that any changes align with the service's objectives and are geared towards improving service delivery and effectiveness.

Service Adaptation: If the assessment of feedback reveals actionable opportunities, Ruah explores how the service can be altered or adapted. This process is conducted with the aim of enhancing service outcomes, ensuring that any modifications are implemented thoughtfully and strategically to benefit the community and service objectives.

Prioritising Service Outcomes: The incorporation of community feedback into service planning and execution prioritizes the improvement of service outcomes. Ruah's approach is to make informed adjustments that not only address the feedback but also contribute to the overarching goal of delivering high-quality, impactful services.

By integrating the community's insights, suggestions, and observations into its operational framework, Ruah demonstrates a commitment to responsive and adaptive service management, with a steadfast focus on achieving the best possible outcomes for those it serves.

Independent complaints resolution- HaDSCO

HaDSCO is an independent state government agency providing a free impartial resolution service for complaints relating to health, mental health or disability services in Western Australia and the Indian Ocean Territories. If you are unhappy with the response from the service or feel uncomfortable approaching the service directly you can contact the following services for assistance: [Health and Disability Services Complaints Office \(HaDSCO\)](#)
08 6551 7600 or Free Call 1800 813 583

Both the SNS and the Ruah Hub are funded by the Department of Communities. The Department of Communities is another escalation point for complaints. These can be made through phoning 1800 333 325 or through their website at the following link. <https://www.wa.gov.au/organisation/department-of-communities/department-of-communities-housing-complaints-and-feedback>

Ruah welcomes all feedback as an integral part of continuous quality improvement and endeavour to resolve complaints in connection to the services that Ruah provides. There may be issues outside our control, for example issues that occur not on Ruah property but that in some ways are related to Ruah, thus as part of the complaint management process, we would make reasonable efforts to resolve issues with stakeholders involved. We have reviewed our complaints management process which ensures that complaints are risk rated and escalated according to seriousness and frequency.

Further to this, Ruah have designed and display signage that outline where to direct feedback during operational hours.

8.3 Engagement with Local Residents for the SNS

Safe Night Space Community Advisory Group

Ruah have established the Community Advisory Group for James St, appointing Ms. Liz MacCleod as the groups independent chair. The Community Advisory Group serves as an advisory body to Ruah's Chief Executive, facilitating open discussions and sharing insights to inform decisions regarding the SNS. The Community Reference Group will meet with the intention to achieve the following objectives:

- Facilitate open and constructive discussion about the service, fostering an environment where all members feel valued and heard, with a focus on the safety and well-being of women.
- Identify and prioritise key concerns, assessing their potential impact on the community, and collaboratively develop responsive strategies with the dual aim of keeping women safe from homelessness, violence, and the risks associated with being on the streets.
- Enable staff to inform the group about key developments, achievements, and outcomes of the service, ensuring transparency and shared understanding, particularly in areas related to protecting service users from homelessness and violence.
- Provide a platform for addressing concerns or exploring opportunities identified by the broader community, aiming to devise creative and responsible solutions that align with the service's objectives.
- Support the service in its objectives to increase awareness and education around the issues it addresses within the community, with a particular emphasis on promoting understanding, preventative measures, and the safety of women.
- Focus on collective solution-finding to unblock difficulties, enhancing community outcomes and ensuring the delivery of the service aligns with the needs and positive outcomes for the community, clients, and the service itself. This includes a dedicated effort to protect women from the dangers of homelessness and street violence, and to provide them with a safe and supportive environment.

- Develop strategies to enhance the integration of the SNS and the James Street hub within the community, fostering stronger connections and collaboration.

The group operates based on principles of mutual respect, collaboration, transparency, and confidentiality.

Membership of the group comprises senior-level representatives from key stakeholders and organisations, ensuring diverse perspectives and expertise are considered. Members include an independent chair, Aboriginal leadership representation, City of Perth representatives, community and neighbour representatives, government agency representatives, WAPOL, healthcare stakeholders, and Ruah staff. The group conducts regular reviews of its composition to ensure alignment with service goals and community needs.

Members attend and participate in meetings, representing community views, respecting confidentiality, and must refrain from media commentary on proceedings. Operating procedures include having approximately 10 members, with the independent chair facilitating discussions and maintaining focus on objectives. Meetings are initially held fortnightly and later adjusted to monthly frequency as the service matures. Decision-making is encouraged through consensus, with a focus on resolving issues effectively.

8.4 Minimising impact on the local surroundings

Our internal practice guides detail information and practical guidance for staff on the following specifics which relate to how we work in the SNS model. Our procedures for managing disruptions after hours include immediate communication with our security team and, when necessary, engagement with the local police. Specific details outlined below:

1. Security Strategies and Extent: Our security measures, including patrols, and CCTV, are implemented not only within but also around the perimeter of our building. The goal is to deter antisocial behaviour and to minimise disruptions after hours. These strategies extend to the immediate areas surrounding the facility where our clients and the local community interact. We have recently installed additional lighting to further increase visibility and therefore increase safety around the area.
2. Our security personnel conduct regular patrols that extend around the entire perimeter of the building. These patrols are not confined to the structure itself but also cover adjacent areas to ensure a comprehensive security presence. This proactive approach allows us to address concerns and potential issues before they escalate.
3. In the event of an incident, our procedures include immediate assessment via CCTV, engagement of security personnel to the location, and if necessary, prompt communication with WAPOL.
4. Our CCTV system has high visibility and covers the entire site. The cameras are positioned strategically to monitor all activities, providing real-time tracking capabilities. This allows us to swiftly respond to any incidents and maintain a secure environment.
5. We have a direct line with our regular contract at WAPOL, with whom we communicate frequently—often daily—to continue our positive relationship and ensure a coordinated response to any incidents.
6. Complaints Policy: For non-urgent issues, community members are encouraged to use our online system to register complaints, which allows us to track and systematically address each concern. For urgent matters, especially those concerning safety, the direct engagement with WAPOL is advised.
7. Direct Police Engagement: We maintain a direct and responsive relationship with WAPOL, ensuring that any antisocial behaviour or safety issues are promptly communicated to the appropriate authorities, leveraging our established rapport with the sergeant in charge.
8. The Safe Night Space (SNS) service includes a mechanism specifically designed for addressing community concerns related to the service during its operational hours. This system enables the community to alert SNS staff via text about situations such as a perpetrator outside the building or any other service-related

issues. Upon receipt of such alerts, the staff will assess the situation to decide whether the involvement of Police or City Rangers is warranted. A designated phone line is established to receive these text messages, ensuring that community concerns are promptly addressed. For issues requiring a more detailed response, community members are encouraged to use the connecting@ruah.org.au email address. This approach ensures that all community concerns relating to the service are managed effectively and efficiently.

Through these measures, we aim to ensure that the SNS is not only a safe place for our clients but also a responsible and responsive neighbour to the residents of the area.

9. Review

This document undergoes regular reviews (at least annually) to remain aligned with evolving community needs and service delivery standards. Significant changes will be communicated to relevant stakeholders, then submitted to the City of Perth.



Waste Management Plan

Ruah – 247 James Street, Northbridge

Prepared for Ruah Community Services

22 December 2022

Project Number: TW22182

DOCUMENT CONTROL					
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2.0	Second Approved Release	30/11/2022	AB	DP	AB
3.0	Third Approved Release	22/12/2022	AB	DP	AB
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Name	Position	File Reference			
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Signature	 Digitally signed by Ann Brouwer Date: 2022-12-22 10:33:09				
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Executive Summary

Ruah Community Services is seeking clearance of a condition of their State Administrative Tribunal Application Approval for their new centre located at 247 James Street, Northbridge (the Site).

To satisfy a condition of the approval, as detailed by the Minister for Planning, the submission of a Waste Management Plan (WMP) that will identify how waste is to be stored and collected from the Site is required. Talis Consultants has been engaged to prepare this WMP to satisfy the condition's requirements.

A summary of the bin size, numbers, collection frequency and collection method is provided in the below table.

Proposed Waste Collection Summary

Waste Type	Generation (L/week)	Bin Size (L)	Number of Bins	Collection Frequency	Collection
Bin Storage Area					
Refuse	1,340	660L	Two	Twice each week	City of Perth
Recycling	1,340	660L	One	Twice each week	City of Perth

The City will collect refuse and recyclables from the Site utilising its kerbside collection service. The City's waste collection vehicle will service the bins from the Bin Presentation Area on James Street.

A building manager will oversee the relevant aspects of waste management at the Site.

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Figure 2: Bin Storage Area

Figure 3: Bin Presentation Area

1 Introduction

Ruah Community Services is seeking clearance of a condition of their State Administrative Tribunal Application Approval for their new centre located at 247 James Street, Northbridge (the Site).

To satisfy a condition of the approval, as detailed by the Minister for Planning, the submission of a Waste Management Plan (WMP) that will identify how waste is to be stored and collected from the Site is required. Talis Consultants has been engaged to prepare this WMP to satisfy the condition's requirements.

The Site is bordered by James Street to the north and commercial properties to the east, south and west, as shown in Figure 1.

1.1 Objectives and Scope

The objective of this WMP is to outline the equipment and procedures that will be adopted to manage waste (refuse and recyclables) at the Site. Specifically, the WMP demonstrates that the Site is designed to:

- Adequately cater for the anticipated volume of waste to be generated;
- Provide adequately sized Bin Storage Area, including appropriate bins; and
- Allow for efficient collection of bins by appropriate waste collection vehicles.

To achieve the objective, the scope of the WMP comprises:

- Section 2: Waste Generation;
- Section 3: Waste Storage;
- Section 4: Waste Collection;
- Section 5: Waste Management; and
- Section 6: Conclusion.

2 Waste Generation

The following section shows the waste generation rates used and the estimated waste volumes to be generated at the Site.

2.1 Proposed Tenancies

The anticipated volumes of refuse and recyclables is based on the floor area (m²) of the Site, with consideration to practices and operations at Ruah’s previous centre. The Site consists of the following:

- Ground Floor Community Centre NLA – 349m²; and
- First Floor Office NLA – 168m².

Please note that the ground floor use type is a drop-in community centre to provide day to day support for the homeless. The first-floor use type is primarily offices.

2.2 Waste Generation Rates

In order to achieve an accurate projection of waste volumes for the Site, consideration was given to the City of Perth’s *Waste Guidelines for New Developments* (Revision 5, effective from June 2019) and the City of Vincent’s *Waste Guidelines for New Developments* (May 2020) as they contain contemporary estimates of waste generated from community centres.

Table 2-1 shows the waste generation rates which have been applied to the Site.

Table 2-1: Waste Generation Rates

Tenancy Use Type	Guideline Reference	Refuse Generation Rate	Recycling Generation Rate
Ground Floor Community Centre NLA	Vincent – Community or Sports Centre	50L/100m ² /day	50L/100m ² /day
First Floor Office NLA	Perth - Offices	10L/100m ² /day	10L/100m ² /day

2.3 Waste Generation Volumes

Waste generation is estimated by volume in litres (L) as this is generally the influencing factor when considering bin size, numbers and storage space required.

Waste generation volumes in litres per week (L/week) adopted for this waste assessment is shown in Table 2-2. It is estimated that the Site will generate 1,340L of refuse and 1,340L of recyclables each week.

Table 2-2: Estimated Waste Generation

Commercial Tenancies	Area (m ²)	Waste Generation Rate (L/100m ² /day)	Waste Generation (L/week)
REFUSE			
Ground Floor NLA	349	50	1,222
First Floor NLA	168	10	118
Total			1,340

Commercial Tenancies	Area (m ²)	Waste Generation Rate (L/100m ² /day)	Waste Generation (L/week)
RECYCLABLES			
Ground Floor NLA	349	50	1,222
First Floor NLA	168	10	118
Total			1,340

3 Waste Storage

Waste materials generated within the Site will be collected in the bins located in the Bin Storage Area as discussed in the following sub-sections and shown in Figure 2.

Note: the waste generation volumes are best practice estimates and bin requirements may be impacted as the development becomes operational and the nature of the tenants and waste management requirements are known.

3.1 Internal Transfer of Waste

To promote positive recycling behaviour and maximise diversion from landfill, internal bins will be available throughout the Site for the source separation of refuse and recycling.

These internal bins will be collected by the staff/cleaners and transferred to the Bin Storage Area for consolidation into the appropriate bins, as required.

All bins will be colour coded and labelled in accordance with Australian Standards (AS 4123.7) to assist visitors, staff and cleaners to dispose of their separate waste materials in the correct bins.

3.2 Bin Sizes

Table 3-1 gives the typical dimensions of standard bins sizes that may be utilised at the Site. It should be noted that these bin dimensions are approximate and can vary slightly between suppliers.

Table 3-1: Typical Bin Dimensions

Dimensions	Bin Sizes		
	240L	660L	1,100L
Height (mm)	1,060	1,200	1,390
Depth (mm)	730	770	1,090
Width (mm)	550	1,360	1,360

Reference: City of Perth Waste Guidelines for New Developments (Revision 5, June 2019)

3.3 Bin Storage Area Size

To ensure sufficient area is available for storage of the bins, the number of bins required for the Bin Storage Area was modelled utilising the estimated waste generation in Table 2-2, bin sizes in Table 3-1 and based on collection of refuse and recyclables twice each week, in line with previous operations.

Based on previous operations and the results shown in Table 3-2, the Bin Storage Area will be sized to accommodate:

- Two 660L refuse bins; and
- One 660L recycling bin.

Table 3-2: Bin Requirements for Bin Storage Area

Waste Stream	Waste Generation (L/week)	Number of Bins Required		
		240L	660L	1,100L
Refuse	1,339	3	2	1
Recycling	1,339	3	2	1

Note: Ruah’s previous centre utilised two 660L refuse bins and one 660L recycling bin collected twice each week.

3.4 Bin Storage Area Design

The current Bin Storage Area design takes into consideration:

- Sufficient space provided for bins and associated equipment to manage all waste and recyclables likely to be generated on the premises between collections and to allow enough room for the bins to sit next to each other;
- Capacity to hold a minimum of 24hrs worth of waste generation;
- Capacity to allow all bins to be easily moved and washed/cleaned;
- Personnel access ways a minimum width of 800mm wide;
- Adequate spacing between bins and walls (minimum 50mm);
- Access to mains water supply and drainage outlets to allow for the washing of surfaces and for the cleaning of bins as required;
- Containing a smooth and impervious floor of not less than 75 millimetres in thickness;
- Smooth and impervious floor to allow for washing of room surfaces; and
- A minimum 1,100mm in width opening to allow easy removal and return of all bin sizes.

Bin numbers and storage space will be monitored by the building manager during the operation of the Site to ensure that the number of bins and collection frequency is sufficient.

4 Waste Collection

The City will service the Site and provide two 660L bins for refuse and one 660L bin for recyclables.

The City will collect refuse and recyclables once each week utilising its rear loader waste collection vehicle.

The City's rear loader waste collection vehicle will service the bins from the Bin Presentation Area on James Street, as shown in Figure 3. The building manager will ferry the bins to and from the Bin Storage Area and the Bin Presentation Area for collection. The City's rear loader waste collection vehicle will travel with left hand traffic flow on James Street and pull up beside the Bin Presentation Area for servicing, as shown in Figure 3.

It is proposed that servicing will be conducted outside of peak traffic hours to mitigate impacts on local traffic movements.

Once servicing is complete the City's rear loader waste collection vehicle will continue in a forward motion along James Street moving with traffic flow. The building manager will return the bins to the Bin Storage Area as soon as possible on the same day following collection.

The City has an endorsed a Noise Management Plan (NMP) that allows areas of the City to be serviced by the City Waste and Cleaning Unit to operate outside the Environmental Protection (Noise) Regulations.

4.1 Bulk and Specialty Waste

Bulk and specialty waste materials will be removed from the Site as they are generated on an 'as required' basis, through the assistance of the building manager. A temporary skip bin could be utilised for collections, if required.

These may include items such as:

- Refurbishment wastes from fit outs;
- Mattresses and clothing;
- Batteries and E-wastes;
- White goods/appliances;
- Cleaning chemicals; and
- Commercial Light globes.

5 Waste Management

A building manager will be engaged to complete the following tasks:

- Monitoring and maintenance of bins and the Bin Storage Area;
- Cleaning of bins and Bin Storage Area, when required;
- Ferrying of bins to and from the Bin Storage Area and Bin Presentation Area on collection days;
- Ensure all staff at the Site are made aware of this WMP and their responsibilities thereunder;
- Monitor staff behaviour and identify requirements for further education and/or signage;
- Monitor bulk and speciality waste accumulation and assist with its removal, as required;
- Regularly engage with staff to develop opportunities to reduce waste volumes and increase resource recovery; and
- Regularly engage with the City to ensure efficient and effective waste service is maintained.

6 Conclusion

As demonstrated within this WMP, the Site will provide a sufficiently sized Bin Storage Area for storage of refuse and recyclables, based on the estimated waste generation volumes, previous operations, and suitable configuration of bins. This indicates that an adequately designed Bin Storage Area has been provided, and collection of refuse and recyclables can be completed from the Site.

The above is achieved using:

- Two 660L refuse bins, collected twice each week; and
- One 660L recycling bin, collected twice each week.

The City will collect refuse and recyclables from the Site utilising its kerbside collection service. The City's waste collection vehicle will service the bins from the Bin Presentation Area on James Street.

A building manager will oversee the relevant aspects of waste management at the Site.

Figures

Figure 1: Locality Plan

Figure 2: Bin Storage Area

Figure 3: Bin Presentation Area



LEGEND

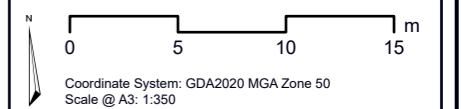
- Site Boundary
- Lot Boundary
- Cadastral**
- Crown Allotment
- Freehold
- Road
- Strata Plan or Lot
- Easement
- Reserve

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LOCALITY

247 James St
Northbridge WA 6003
Ruah Community Services



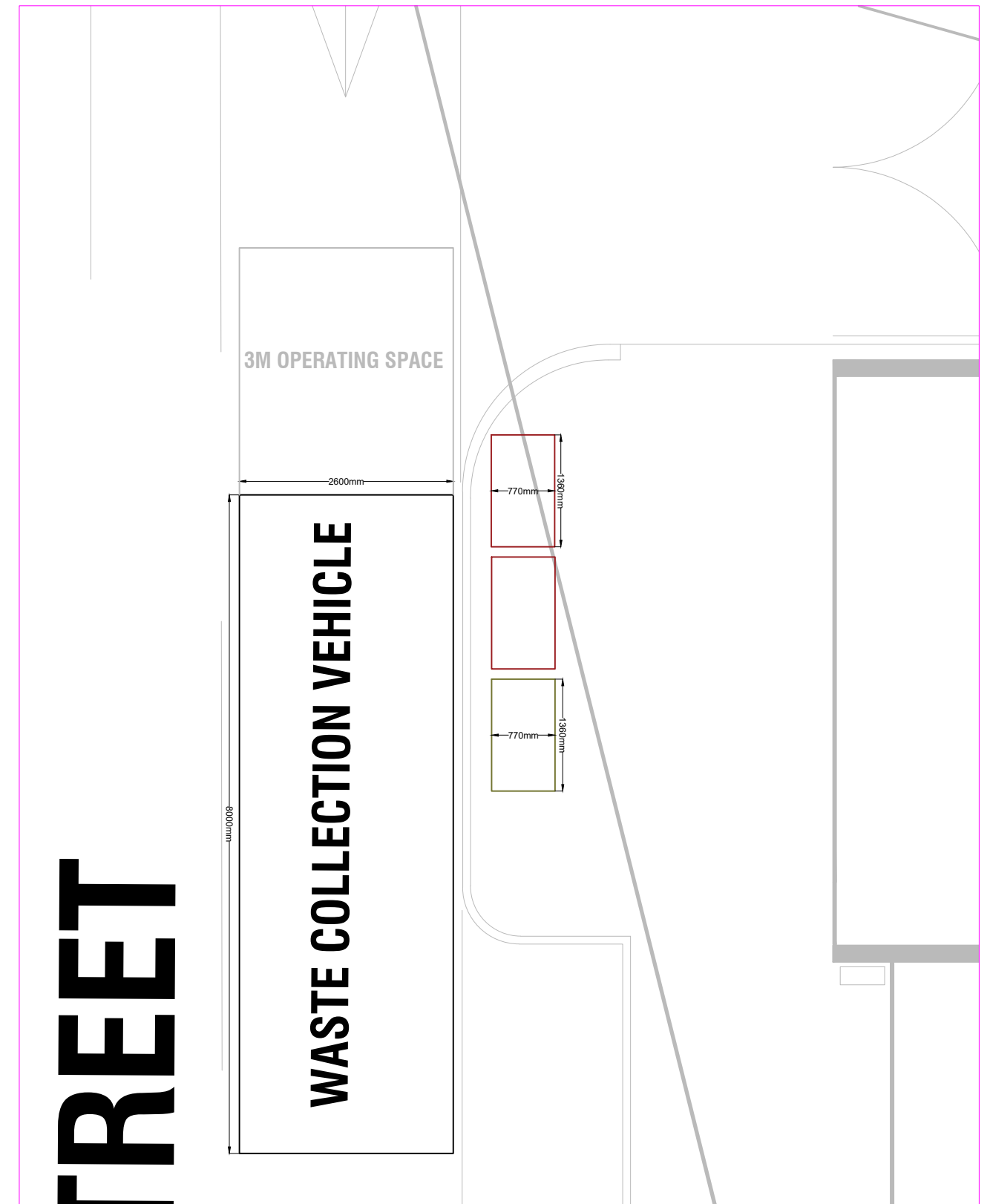
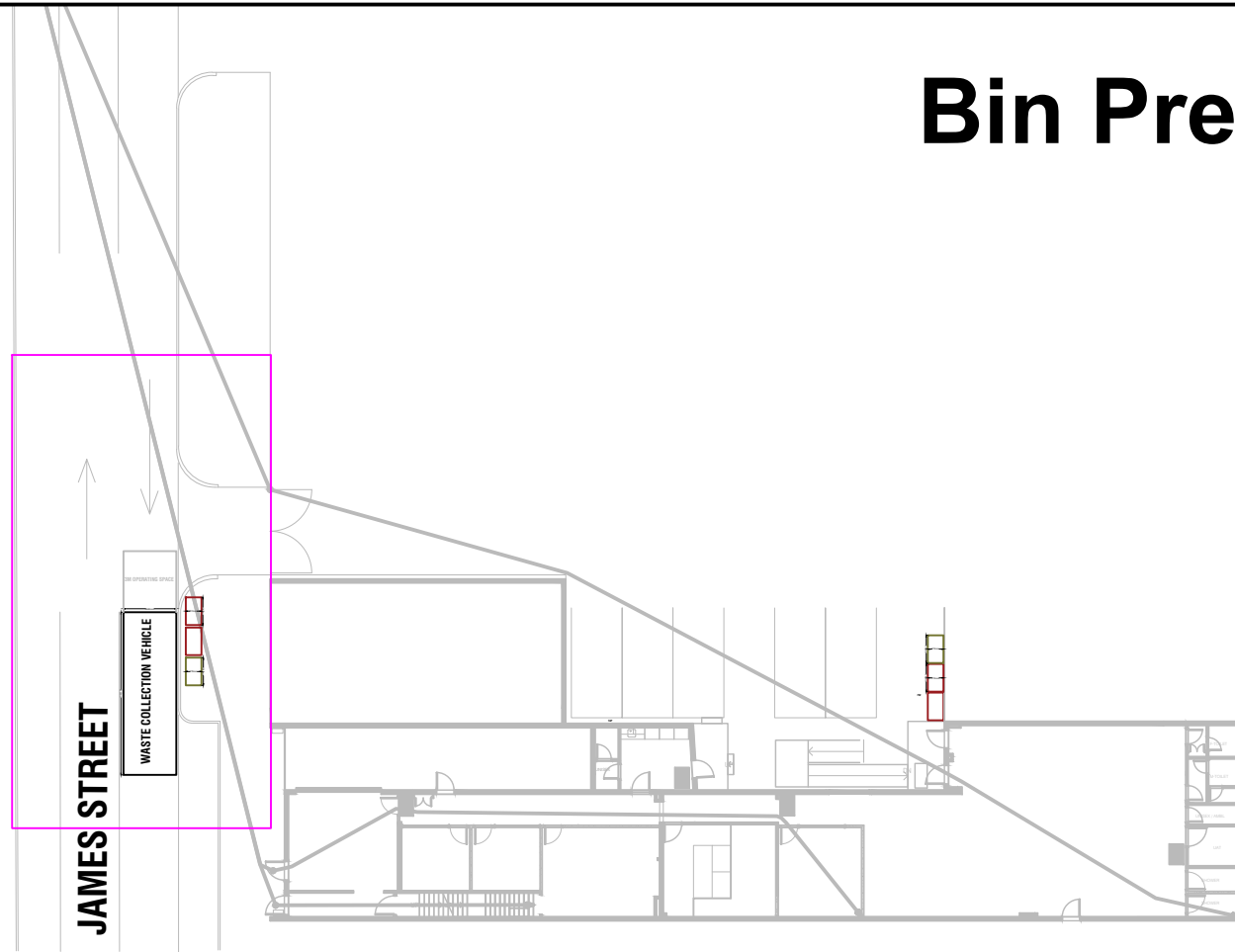
Prepared: T Baskerville	Date: 28/11/2022
Reviewed: A Brouwer	Revision: A
Project: TW22182	



Figure 01

Data source: Roads, Cadastre - Landgate, 2022; Imagery: Nearmap, 2022.

Bin Presentation Area



Legend:

Bin Presentation Area

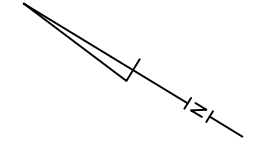
- 2 x 660L refuse (770mm x 1,360mm)
- 1 x 660L recycling (770mm x 1,360mm)

Bin Storage Area

Legend:

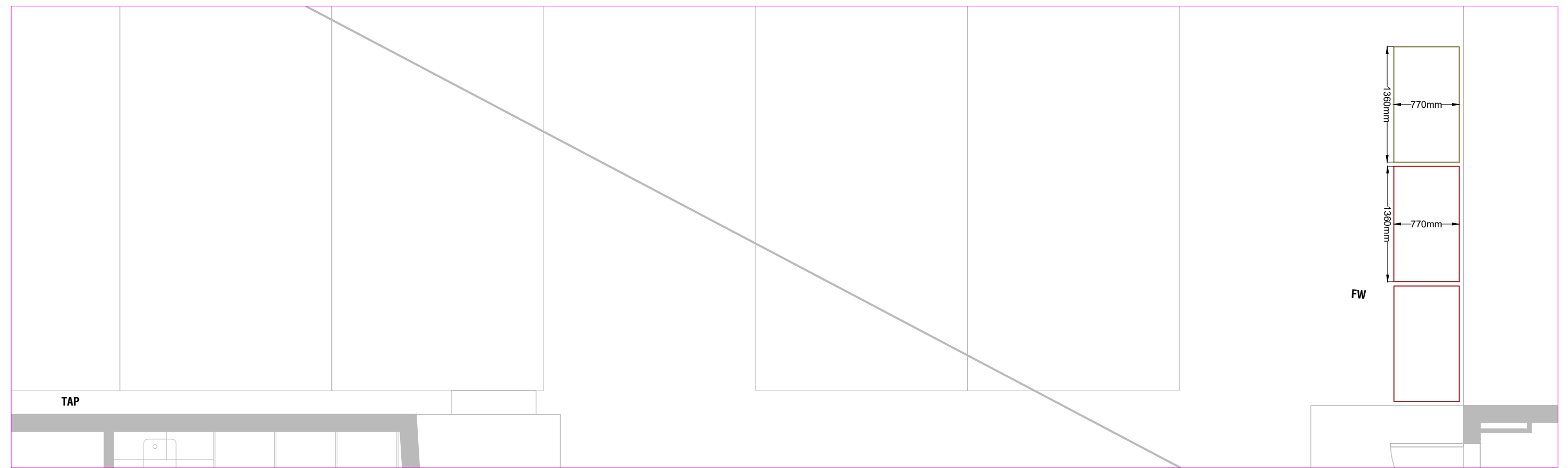
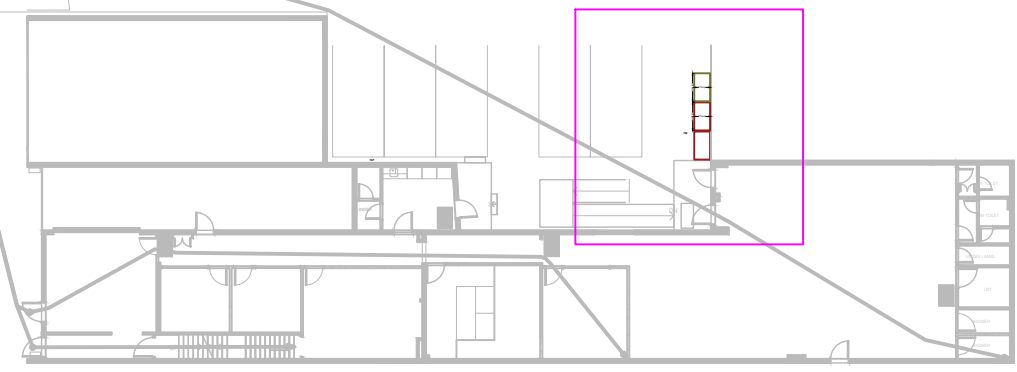
Bin Storage Area

- 2 x 660L refuse (770mm x 1,360mm)
- 1 x 660L recycling (770mm x 1,360mm)



JAMES STREET

WASTE COLLECTION VEHICLE





Assets | Engineering | Environment | Noise | Spatial | Waste

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Safe Night Space (SNS) Operational Management Plan Comparison

Comparing the differences between the document presented 23 January 2024 to the City of Perth and the document presented 4 March 2024 to the State Administrative Tribunal

(1) Section 2 of the OMP dated 23 January 2024 titled 'Overview – Ruah Safe Night Space for Women'

Section 2.1 on page 5 of the OMP dated 23 January 2024 provides as follows:

Safe Night Space for Women

Changes in OMP dated 4 March 2024

Section 2.1 on page 4 of the OMP dated 4 March 2024 which provides as follows:

The role of the Safe Night Space

Rationale for change

Amendment of title to clarify the purpose of this section.

(2) Section 2 of the OMP dated 23 January 2024 titled 'Overview – Ruah Safe Night Space for Women'

Section 2.1 on page 6 of the OMP dated 23 January 2024 provides as follows:

Our current operational approach at the Safe Night Space (SNS) caters to a maximum of 20 scheduled referrals, 5 walk-ins, and 5 emergency cases per night. In scenarios where our capacity is reached, individuals are directed to alternative services like Crisis Care for support. We encourage those we cannot accommodate to seek safer locations, and we coordinate with local authorities only when necessary to ensure everyone's safety.

Rationale for change

The removal of specific operational details regarding the capacity at the SNS is justified based on the necessity for operational flexibility over the service's lifespan. By eliminating the rigid delineation between walk-ins and emergency cases, the revised documentation adapts to the fluidity of client needs and operational circumstances. This change, reflecting the feedback and insights gained from broad sector engagement and the practical experience at the Rod Evans Centre, underscores a shift towards a more adaptable service model. The removal does not impact the overall capacity for client numbers but enhances the service's ability to adjust dynamically to changing conditions, maintaining service effectiveness and responsiveness as outlined in the updated Operational Management Plan (OMP) dated 4 March 2024. This approach ensures that the service can continue to respond effectively to varying demands and does not have an impact on maintaining clarity, safety, and comprehensive community engagement strategies

(3) Section 2 of the OMP dated 23 January 2024 titled ‘Overview – Ruah Safe Night Space for Women’

Section 2.1 on page 6 of the OMP dated 23 January 2024 provides as follows:

Building upon our two years of successful operation at the SNS at Rod Evans and our services at James St, we continue to refine our approach to managing non-admittance. Our experience has enabled us to successfully support people through a variety of options, including the Noongar Patrol, Street chaplains, the HEART team, and providing taxis to safe locations for family or friends. Additionally, our security teams are adept at supporting individuals as they move on, and we can facilitate access to Crisis Care for refuge beds. We maintain strong links with partner organizations and agencies, including WAPOL, ensuring a collaborative and supportive network for those in need.

Changes in OMP dated 4 March 2024

Section 2.1 on page 5 of the OMP dated 4 March 2024 which provides as follows:

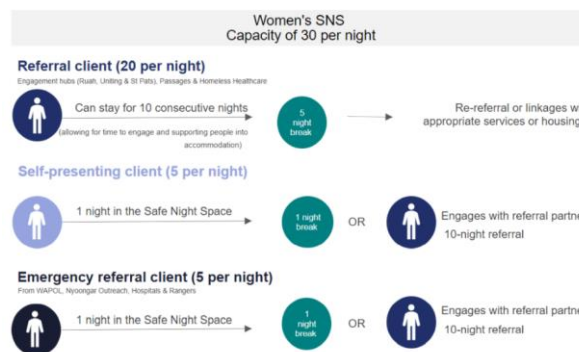
Building upon our two years of successful operation at the SNS at Rod Evans and our services at James St, we will continue to refine our approach to managing non-admittance. We will outline the comprehensive steps we have established for redirecting individuals to alternative accommodations. Our experience has enabled us to successfully support people through a variety of options, including the Noongar Patrol, Street chaplains, the HEART team, and providing taxis to safe locations for family or friends. We maintain strong links with partner organizations and agencies, including WAPOL, ensuring a collaborative and supportive network for those in need.

Rationale for change

The March 2024 revision of the Operational Management Plan enhances its approach to non-admittance by replacing 'refuge beds' with 'alternative accommodations'. This change broadens the scope of housing options, offering more comprehensive support and improving inclusivity for clients. It aligns with ongoing partnerships, like those with WAPOL, to ensure effective and collaborative support networks. This update underscores a strategic enhancement in addressing diverse client needs more effectively.

(4) Graphic in section 2 of the OMP dated 23 January 2024 titled ‘Overview – Ruah Safe Night Space for Women’

The graphic in section 2.1 on page 7 of the OMP dated 23 January 2024 provides as follows:



Rationale for change

The removal of the detailed operational diagram is justified by the evolving nature of the service landscape, including changes in referral pathways and service integration. This change enhances flexibility and adaptability without affecting the high-level service offerings. By omitting the diagram, the documentation remains streamlined and responsive to dynamic client needs, ensuring resources are efficiently focused on service delivery in a fluctuating environment.

(5) Section 3 of the OMP dated 23 January 2024 titled 'Operation of the SNS facility'

Section 3 on page 7 of the OMP dated 23 January 2024 provides as follows:

3.1 Staffing

Rationale for change

Removal of 'Staffing' subtitle as unnecessary. Theme of 'staffing' incorporated into the section.

(6) Section 3 of the OMP dated 23 January 2024 titled 'Operation of the SNS facility'

Section 3 on page 7 of the OMP dated 23 January 2024 provides as follows:

The SNS is staffed with Ruah workers between 6:30pm and 7:30am each night (client opening hours are 7am – 7pm, with security on-site are from 7pm until 8am). From our experience the demand in winter is higher and therefore due to weather events such as hot conditions or extreme winter conditions the opening hours are at times, slightly adapted to ensure the safety of women escaping crisis.

Changes in OMP dated 4 March 2024

Section 3 on page 5 of the OMP dated 4 March 2024 which provides as follows:

The SNS is staffed with Ruah workers from 6:30pm to 7:30am each night. Clients can use the service between 7pm and 7am. Based on our experience, we note that demand increases during winter; hence, opening hours may slightly adapt in response to extreme weather conditions, such as heatwaves or severe winter weather, to ensure the safety of women escaping crisis.

Rationale for change

The revisions in Section 3 the operation hours and security details at the SNS facility, aligning them more closely with actual service needs. By specifying that security is present for the entirety of the service hours (7pm to 7am), the plan reduces ambiguity and simplifies operational descriptions. Additionally, it allows for flexible opening hours in response to seasonal demand changes, particularly during extreme weather conditions, ensuring the facility remains a secure and responsive environment for women in crisis. This update, driven by practical experience and feedback, enhances operational clarity and adaptability, improving service effectiveness and safety.

(7) Section 3 of the OMP dated 23 January 2024 titled 'Operation of the SNS facility'

Section 3 on page 7 of the OMP dated 23 January 2024 provides as follows:

This structure assures that there are always four staff members present on-site, which is crucial for maintaining safety and managing risk effectively. Furthermore, during peak times or in situations of high demand, we activate our on-call process, which allows us to quickly mobilise additional staff

members and leadership (on call) as needed. This includes leaning on other experienced teams stationed at nearby sites, thereby ensuring that we can scale our response appropriately and maintain the high standards of safety and service that we have set. Our proven track record in running the SNS model for over two years gives us the confidence in this dynamic and responsive staffing approach.

Changes in OMP dated 4 March 2024

Replaced with section 3 on page 5 of the OMP dated 4 March 2024 which provides as follows:

This structure guarantees the presence of four staff members on-site at all times whilst SNS is operating and is, crucial for maintaining safety and managing risk effectively. In peak times or high-demand situations, we activate our on-call process to quickly mobilize additional staff and leadership, including Ruah's Senior Clinical Project Lead (SCPL), demonstrating our dynamic and responsive approach to staffing, refined over two years of operating the SNS model.

Rationale for change

The updated Section refines staffing descriptions, emphasising a guaranteed presence of four staff members at all times to enhance safety and risk management. This revision introduces the role of Ruah's Senior Clinical Project Lead in the on-call process, highlighting a more strategic and responsive staffing capability during peak or high-demand times. Additionally, the update underscores over two years of operational experience, showcasing the effectiveness and adaptability of the staffing strategy. These changes aim to improve clarity and operational specificity, aligning the documentation more closely with practical needs and enhancing the overall management of the SNS facility.

(8) Section 3 of the OMP dated 23 January 2024 titled 'Operation of the SNS facility'

Section 3 on page 7 of the OMP dated 23 January 2024 provides as follows:

All Ruah staff are appropriately qualified and receive regular training and supervision and come with significant experience in the community services sector. They are supported in the evenings by Ruah's internal on-call system which is staffed by management personnel. During usual business hours Ruah staff also have support from the Housing & Homelessness Leadership Team.

Changes in OMP dated 4 March 2024

Replaced with Section 3 on page 5 of the OMP dated 4 March 2024 which provides as follows:

Ruah staff are well-qualified, receiving ongoing training and supervision, and bring extensive sector experience. Evening support is bolstered by Ruah's internal on-call management, while the Housing & Homelessness Leadership Team and the SCPL provide additional support during usual business hours.

Rationale for change

Added clinical role SCPL. Wording changes made for clarity and readability.

(9) Section 3 of the OMP dated 23 January 2024 titled 'Operation of the SNS facility'

Section 3 on pages 7 & 8 of the OMP dated 23 January 2024 provides as follows:

In alignment with our comprehensive understanding of our clientele and our unwavering commitment to their safety, we've established a robust staffing mix that ensures the safe management of client flow and intake processes. Our staffing configuration is as follows:

The Ruah team consists of:

- 1. SNS team leader who works across several sites, located on site for parts of the evening and as needed.*
- 2. Presence of 2 security personnel at all times who are involved in the intake process and work with clients through the evening alongside the Ruah team.*
- 3. 6:30pm – 12:00am / Ruah worker x 2*
- 4. 11:30pm – 7:00am / Ruah worker x 1*
- 5. 12:00am – 7:30am / Ruah worker x 1*
- 6. Additional workers visit to provide specific activities and supports such as medical workers, volunteer support workers, are additional to this core model and support with group activities, at times counselling or specific supports as required.*

Moreover, our senior leadership team is not only present but actively engaged in supporting our staff. They regularly participate in team meetings and are available during specific times when targeted support or training is needed. This leadership involvement is integral to our operational success, ensuring that staff feel supported, and that service delivery is of the highest standard. Our leadership's hands-on approach also facilitates a quick and effective response to any emerging needs or challenges, reinforcing our commitment to safety and excellence in client service.

Changes in OMP dated 4 March 2024.

Replaced with Section 3 on pages **5 & 6** of the OMP dated 4 March 2024 which provides as follows:

Our staffing mix is designed to ensure safe and efficient client flow and intake processes, reflecting our deep understanding of our clientele and commitment to their safety. The Ruah team configuration includes:

The Ruah team consists of:

- 1. Ruah leadership team & dedicated Senior Clinical Project Lead*
- 2. Staff who are dedicated and always stationed onsite during service opening hours:*
 - Presence of 2 security personnel at all times whilst the SNS is operating, who are involved in the intake process and work with clients through the evening alongside the Ruah team.*
 - Two Ruah workers are onsite at all times between 630pm-730am each day of SNS operation.*
- 3. Additional workers visit to provide specific activities and supports such as medical workers, volunteer support workers, are additional to this core model and support with group activities, at times counselling or specific supports as required.*

Our senior leadership team actively supports our staff by participating in team meetings and being available for targeted support or training. This involvement is crucial for operational success, ensuring staff feel supported and that service delivery meets the highest standards. The proactive engagement of our leadership also enables a swift and effective response to emerging needs or challenges, underscoring our dedication to safety and excellence in client service.

Rationale for change

The section was amended for brevity and clarity, integrating the addition of the Senior Clinical Project Lead (SCPL) role and highlighting Ruah's experience in operating the SNS service. Wording changes were made to enhance clarity and readability. The workforce model now ensures the presence of 2 x Ruah workers onsite at all times between 1830 and 0730 each day, with role titles streamlined to "Ruah worker" for simplicity and consistency. These adjustments aim to improve the readability and comprehension of the OMP, ensuring stakeholders have a clear understanding of the staffing and leadership structures.

(10) Section 4 of the OMP dated 23 January 2024 titled 'Security Management'

Section 4 on page 9 of the OMP dated 23 January 2024 provides as follows:

Composition of the Security Team

The facility is staffed by a dedicated security team, comprising of 2 security guards on duty from 7:00 pm to 8:00 am daily.

Changes in OMP dated 4 March 2024

Removal of above in Section 4, as documented on pages 5 & 6 of the OMP dated 4 March 2024

Rationale for changes

The removal of section 4 is due to redundancy and is further addressed in a dedicated section. Comprehensive security measures are addressed in section 4, 4.1, 4.2, 4.3 & in section 7 of the March document. This change streamlines the OMP by eliminating duplicate content, ensuring clarity and conciseness. We have made this streamline to avoid confusion between the day service and the night service noting this OMP is specific for SNS evening service not the day hub which also has security during all opening hours.

(11) Section 4 of the OMP dated 23 January 2024 titled 'Security Management'

Section 4 on page 8 of the OMP dated 23 January 2024 provides as follows:

We have developed a comprehensive response protocol for our security team, addressing incident escalation, site hygiene, external noise management, litter, and abandoned belongings, which are integrated into our management plan:

- 1. Incident Escalation: Our security personnel are trained to assess situations and escalate incidents according to severity. This may involve direct communication with our management team, engagement with local services, or contacting WAPOL when necessary.*
- 2. Site Hygiene: Security is responsible for monitoring the cleanliness of the site, coordinating with cleaning staff, and addressing any hygiene issues immediately to maintain a safe and sanitary environment.*
- 3. External Noise Management: The team actively works to minimise noise disruptions, implementing strategies such as designated quiet hours and liaising with clients and neighbours to ensure community standards are met while SNS clients rest during the night.*
- 4. Litter and Abandoned Belongings: Our staff follows a clear process for managing litter and belongings left behind, which includes safe disposal of trash and storage or return of personal items when possible, using Ruah's waste management processes.*

Changes in OMP dated 4 March 2024

Replaced with Section 4 on page 6 of the OMP dated 4 March 2024 which provides as follows:

We have developed a comprehensive response protocol for our security team, addressing incident escalation, site hygiene, external noise management, litter, and abandoned belongings, which are integrated into our management plan:

- 1. Incident escalation: We have developed a comprehensive response protocol which our SNS work to, this includes processes around incident management environmental management of the service and site. Incident Escalation: Our security personnel are trained to assess situations and escalate incidents according to severity. This may involve direct communication with our management team, engagement with local services, or contacting WAPOL when necessary. On the hour checks and presence will be conducted by security.*
- 2. Site Hygiene: Ruah is responsible for the cleanliness and upkeep of the premises at 247 James St, with staff and contractors assigned various duties to ensure the property is well-maintained. Additionally, Ruah will collaborate with City Rangers, alerting them to any issues in the surrounding area and calling on police assistance for any illegal activities or serious concerns for safety of either clients, staff or the community.*
- 3. External Noise Management: The team actively works to minimise noise disruptions, implementing strategies such as designated quiet hours.*
- 4. Litter and Abandoned Belongings: Our staff follows a clear process for managing litter and belongings left behind within the Safe Night Space. The security role supports in overseeing and ensuring the safety of excess luggage, when a woman is inside the Safe Night Space. The services has a mechanism to ensure safe luggage storage while a woman is using the service each night. Any items left at the service which are not claimed will be removed and disposed of.*

Rationale for changes

The revision enhance security and operational protocols to better meet client needs and improve service efficiency. Key changes include detailed incident management procedures with regular security checks, the delegation of site cleanliness to Ruah with coordination from City Rangers for broader area issues, and specific roles for managing client luggage to ensure safety and organisation. These updates streamline responsibilities and strengthen collaboration with local services, optimising the security and maintenance of the facility to ensure a safer, more responsive environment for clients.

(12) Section 4 of the OMP dated 23 January 2024 titled 'Security Management'

Section 4 on page 9 of the OMP dated 23 January 2024 provides as follows:

Under Training and Licensing Requirements

Our security personnel are required to remain on-site between the critical times of closure at 7 am and service opening at 8 am to maintain continuous surveillance. Security recommences at the Ruah Hub working from 8am through to 2pm so there is adequate coverage of security during the handover period. All hours where there are clients at the James St facility – there is always two security on site at all times and service closure.

Changes in OMP dated 4 March 2024

Removal of Section 4 on page 7 of the OMP dated 4 March 2024 which provides as follows:

Our security personnel are required to remain on-site between the critical times of opening.

Rationale for changes

The removal of section 4.3(2) which detailed specific security personnel requirements during closure times, is due to redundancy and is further addressed in a dedicated section not under training and licencing. The 4 March version outlines comprehensive security measures are addressed in section 4, 4.1, 4.2, 4.3 & in section 7 and throughout the document where relevant in addition. This change streamlines the OMP by eliminating duplicate content, ensuring clarity and conciseness. The revised plan maintains a robust security presence during all operational hours, with two security personnel and two Ruah workers on-site throughout the night. This staffing mix is designed to ensure the safe and efficient flow of clients during intake and service hours, demonstrating a deep commitment to client safety. This restructuring within in the document reflects Ruah’s strategy to optimise resource allocation and maintain high service standards without compromising security and support for clients.

(13) Section 4 of the OMP dated 23 January 2024 titled ‘Security Management’

Section 4.3 on page **11** of the OMP dated 23 January 2024 provides as follows:

Deliveries and Suppliers – section has been moved to Section 5.4 in OMP dated 4 March 2024

Changes in OMP dated 4 March 2024

Section 4.3 on page **9** of the OMP dated 4 March 2024 which provides as follows:

Security protocol

Rationale for changes

Relocation of section as better positioned in Section 5.4

(14) Section 4 of the OMP dated 23 January 2024 titled ‘Security Management’

Section 4.4 on page **11** of the OMP dated 23 January 2024 provides as follows:

Servicing and Cleaning Plan – section has been moved to Section 5.5 page 9 in OMP dated 4 March 2024

Changes in OMP dated 4 March 2024

Section 4.4 on page **7** of the OMP dated 4 March 2024 which provides as follows:

Community Safety

Rationale for changes

Relocation of section as better positioned in Section 5.5.

(15) Section of the OMP dated 23 January 2024 titled ‘Security Management’

Section 4.1 on page **10** of the OMP dated 23 January 2024 which provides as follows:

Access to the Building

Changes in OMP dated 4 March 2024

Moved to Section 5.1 on page 8 of the OMP dated 4 March 2024

Rationale for changes

Relocation of section as better positioned in Section 5.1.

(16) Section 4 of the OMP dated 23 January 2024 titled 'Security Management'

It was Section 4.1 on page 10 of the OMP dated 23 January 2024 provides as follows:

While we do not offer lockers for long-term storage, to accommodate clients during their time at the facility, lockers for day storage are available to safely house their possessions while they stay the night at the Safe Night Service.

Changes in OMP dated 4 March 2024

Removed under section 5.1 on page 8 of the OMP dated 4 March 2024 and replaced with additional point to outline the patrols conducted by security and management of hazards as follows:

Security will conduct hourly patrols as part of their shift schedule, covering the interior, external side of the building, and the area directly outside the front of the building, ensuring that any hazards are identified, removed, and properly disposed of.

Rationale for changes

The rationale for preferring the March version of the OMP is founded on its practical enhancements to security protocols and hazard management. The previous detail on day storage lockers has been removed in favour of a robust description of hourly security patrols which offers a broader more proactive approach. These patrols encompass the facility's interior and exterior, proactively managing hazards, and thus elevating the safety standards. This shift prioritises continuous monitoring over static storage solutions, aligning the OMP with a proactive security strategy that actively mitigates risks and maintains a safe environment for clients. The service is committed to managing client's belongings while they are using the service, and this version covers a more encompassing approach to this based on feedback heard through our engagement and work with the community – understanding this as a priority for the neighbours.

(17) Section 4 of the OMP dated 23 January 2024 titled 'Security Management'

Section 4.1 on page 10 of the OMP dated 23 January 2024 provides as follows:

Main Entrance: Located at the front on James Street, this entrance is primarily for client use. It is managed by security officers at a reception and triage desk. To respect our neighbours, a 10pm attendance curfew is enforced for clients entering through this door.

Changes in OMP dated 4 March 2024

Additional information provided in section 5.2 on page 8 & 9 of the OMP dated 4 March 2024 which provides as follows:

Main Entrance: To enhance service efficiency and manage client flow effectively, clients are encouraged to coordinate with designated hubs during the day and present to the SNS between 7pm-10pm for planned visits. The main entrance, situated at the front on James Street, is intended for

client use and will be managed by security officers at a reception, triage desk. This allows for a space where we assess risks and speak about rights and responsibilities in the service. This measure allows us to focus on emergency presentations after 10pm, ensuring that staff can dedicate the necessary attention to clients with present in emergency situations with urgent and complex needs. Encouraging early presentation supports the safety and smooth operation of the service, helping to manage the flow of clients efficiently throughout the evening.

Rationale for changes

The March OMP introduces additional detail to the main entrance operations, enhancing service efficiency and client flow management. It encourages coordination with designated hubs and specifies a 7pm-10pm window for planned visits. This allows security officers at the front entrance on James Street to effectively manage reception and triage, focusing on risk assessment and discussing service rights and responsibilities. Post-10pm, the service prioritises emergency cases, ensuring staff can provide focused attention to those with urgent needs. This operational refinement, by encouraging earlier client presentation, promotes safety and smooth service operation, underlining the importance of a clear and efficient intake process.

(18) Section 4 of the OMP dated 23 January 2024 titled 'Security Management'

Section 4.2 on page **11** of the OMP dated 23 January 2024 provides as follows:

Our approach to managing parking and non-admitted individuals in the vicinity of the Safe Night Space (SNS) is comprehensive and considerate of the community's needs:

Changes in OMP dated 4 March 2024

Section removed in section 5.3 on page **9** of the OMP dated 4 March 2024

Rationale for changes

Parking is covered on page 10 of the 4 March document in a dedicated section.

(19) Section 4 of the OMP dated 23 January 2024 titled 'Security Management'

Section 4.2 on page **11** of the OMP dated 23 January 2024 provides as follows:

We ensure that our Rights and Responsibilities documentation clearly communicates expectations regarding the use of surrounding parking areas.

Changes in OMP dated 4 March 2024

Additional information added in section 5.3 and on page **9** of the OMP dated 4 March 2024 which provides as follows:

Security will conduct hourly patrols as part of their shift schedule, covering the interior, external side of the building, and area directly outside the front of 247 James St. Illegal behaviour and safety concerns will be reported to the Police. Part of this role includes, providing guidance and assistance to ensure individuals are aware of parking protocols and maintaining a secure environment for all.

Rationale for changes

The March OMP includes an enhanced focus on proactive security measures and client guidance, particularly concerning the use of surrounding parking areas. By adding information to Section 5.3(4)

about security's hourly patrols, which now encompass monitoring parking protocol adherence, the document extends the scope of safety and security beyond the interior to the surrounding environment of the SNS. This amendment ensures that expectations around parking are not just communicated through documentation but are also actively managed by security personnel, reinforcing a secure and well-ordered service setting.

(20) Section 4 of the OMP dated 23 January 2024 titled 'Security Management'

Section 4.2 on page **11** of the OMP dated 23 January 2024 provides as follows:

We acknowledge that there is no street parking available directly across from the SNS, as these are reserved for WAPOL vehicles.

Changes in OMP dated 4 March 2024

Relocated to section 5.3 and on page **9** of the OMP dated 4 March 2024

Rationale for changes

The March OMP repositions the content from Section 4.2(5), acknowledging the absence of street parking opposite the SNS due to WAPOL vehicle reservations, to a more contextually relevant section, 5.3.

(21) Section 4 of the OMP dated 23 January 2024 titled 'Security Management'

Section 4.2 on page **11** of the OMP dated 23 January 2024 provides as follows:

Staff Parking: Designated secure parking for staff is available at the rear of the building.

Changes in OMP dated 4 March 2024

Relocated and slight change in wording in section 5.3 and on page **9** of the OMP dated 4 March 2024 which provides as follows:

Staff Parking: limited designated, secure parking for staff is available at the rear of the building.

Rationale for changes

Minor wording changes for clarity.

(22) Section 4 of the OMP dated 23 January 2024 titled Security Management'

Section 4.4 on page **12** of the OMP dated 23 January 2024 provides as follows:

Exterior Monitoring and Disposal: Vigilant monitoring of the facility's exterior is undertaken to identify and manage unattended or unwanted personal items, with appropriate disposal or secure storage as required.

This approach integrates our proven day-to-day operations with external professional services to provide a clean, hygienic, and safe environment at the James St facility. Our strategy is designed to be responsive and responsible, maintaining the well-being of our clients and the broader community while continuing our practices of environmental cleanliness and public health.

Changes in OMP dated 4 March 2024

Additional information added in section 5.5 and on page **10** of the OMP dated 4 March 2024 which provides as follows:

Exterior Monitoring and Disposal: Ruah is responsible for the cleanliness and upkeep of the premises at 247 James St, with staff and contractors conducting daily checks of the interior, outside, and exterior areas. Clients are informed that any unclaimed items left inside or outside the premises will be removed and disposed of if not claimed within two days. Ruah alerts City Rangers for any issues in the surrounding area and engages police assistance for any illegal activities.

This holistic approach integrates our proven day-to-day operations with external professional services to provide a clean, hygienic, and safe environment at the James St facility.

Rationale for changes

The March OMP revision expands on exterior monitoring and disposal responsibilities, ensuring a cleaner and safer environment at the James St facility. Ruah now overtakes full responsibility for the cleanliness and maintenance of the premises, with clear protocols for unclaimed items and active engagement with City Rangers and police for surrounding area issues. This update enhances the document's specificity regarding roles in environmental upkeep and client communication about personal belongings, ensuring a proactive and comprehensive approach to facility management.

(23) Section 6 of the OMP dated 23 January 2024 titled 'Risk and Complaint Management of Activities on Site'

Section 6 on page **12** of the OMP dated 23 January 2024 provides as follows:

Risk and Complaint Management of Activities on Site

Changes in OMP dated 4 March 2024

Words removed in Section 6 and on page **10** of the OMP dated 4 March 2024 which provides as follows:

Risk and Complaint Management

Rationale for changes

It allows for a more comprehensive approach to risk and complaint management.

(24) Section 6 of the OMP dated 23 January 2024 titled 'Risk and Complaint Management of Activities on Site'

Section 6.1 on page **13** of the OMP dated 23 January 2024 provides as follows:

Ruah's financial systems and procedures are continuously reviewed to ensure they are accurate, efficient and fit-for-purpose. Ruah's financial systems are secure and cloud-based, and provide appropriate access for workers, based on positions and security levels. Ruah undertakes interim and annual financial audits and was issued with an unmodified audit report with no recommendations for the FY2020.

Ruah was assessed is accredited against the National Standards for Mental Health Services and the National Safety and Quality Health Services Standards in November 2018 and achieved certification through to January 2022.. Ruah also recently achieved Rainbow Tick Accreditation and anecdotal feedback was that we had set new benchmarks

Changes in OMP dated 4 March 2024

Section 6.1 on page **11** of the OMP dated of the OMP dated 4 March 2024 which provides as follows:

Ruah's financial systems and procedures are continuously reviewed to ensure they are accurate, efficient and fit-for-purpose. Ruah's financial systems are secure and cloud-based, and provide appropriate access for workers, based on positions and security levels. Ruah undertakes interim and annual financial audits and was issued with an unmodified audit report with no recommendations for the FY2020.

Ruah was assessed against the National Standards for Mental Health Services and the National Safety and Quality Health Services Standards in November 2018 and achieved certification through to January 2022. Ruah also recently achieved Rainbow Tick Accreditation and anecdotal feedback was that we had set new benchmarks.

Rationale for changes

The revised version streamlines the content by focusing solely on Ruah's financial systems and procedures and updated accreditation timelines. Ensuring clarity and relevance to the OMP's financial management section, while omitting unrelated topics for a more concise presentation.

(25) Section 7 of the OMP dated 23 January 2024 titled 'Local Engagement and Complaints'

Section 7 on pages **17-19** of the OMP dated 23 January 2024 provides as follows:

Local Engagement and Complaints

Changes in OMP dated 4 March 2024

Section moved to Section 8 on pages **15-18** of the OMP dated of the OMP dated 4 March 2024

Rationale for changes

Change to outline further Ruah's commitment to positively engaging with the local community.

(26) Section 7 of the OMP dated 23 January 2024 titled 'Local Engagement and Complaints'

Section 7.1 on page **17** of the OMP dated 23 January 2024 provides as follows:

The facility is situated in an area that contains a number of existing businesses and residents.

The services in this facility have been designed to co-exist with the local community and to play a positive part in improving the amenity and safety of the area. Ruah is committed to ensuring there is no antisocial behaviour in the vicinity of the building and ensure appropriate management of the surrounding area. Strategies such as security patrols, lighting, CCTV, and procedures to minimise disruptions after-hours are part of the approach to managing this important relationship.

Through these strategic engagements and security measures, we are committed to upholding the well-being of the community, ensuring the safe operation of our Hub, and maintaining a harmonious and mutually beneficial relationship with all local stakeholders.

Changes in OMP dated 4 March 2024

Section 7.1 on page **12** of the OMP dated of the OMP dated 4 March 2024 which provides as follows:

Security Personnel Contracting – Ruah employs a team of contracted security personnel, ensuring a professional approach to facility safety and disturbance management. Two security workers are on site at all times. during SNS operations. Security personnel conduct hourly checks inside, outside, and around the sides of the building as a core part of their duties, and are responsible for reporting any illegal activity to the police.

Rationale for changes

The revised version enhances transparency by providing additional context about the facility's location and emphasises Ruah's commitment to positively engaging with the local community. It outlines comprehensive security measures, including patrols, lighting, and CCTV, demonstrating proactive efforts to maintain safety and harmony in the area. This March version represents a preferable approach, aligning with best practices in security management and offering a proactive solution to maintain community well-being and stakeholder relations.

(27) Section 7 of the OMP dated 23 January 2024 titled 'Local Engagement and Complaints'

Section 7.2 on page **17** of the OMP dated 23 January 2024 provides as follows:

As part of operating this facility we take in complaints as a part of the quality improvement process. Listening and early communication is key to resolving concerns with clients, neighbours, and the community. Complaints (which could be in connection to a client or the services that Ruah provides) can be made via the feedback form via the website, calling 13 RUAH (who direct the complaint to the appropriate service/area), or emailing connecting@ruah.org.au or feedback@ruah.org.au

Changes in OMP dated 4 March 2024

Section 7.2 on pages **12 & 13** of the OMP dated of the OMP dated 4 March 2024 which provides as follows:

Non-Urgent Complaints: For complaints that do not require immediate attention, complaints (which could be in connection to a client or the services that Ruah provides) can be made via the feedback form via the website, calling 13 RUAH (who will direct the complaint to the appropriate service/area), or emailing connecting@ruah.org.au or feedback@ruah.org.au.

Rationale for changes

Emphasises proactive complaint management as integral to quality improvement, prioritising early communication for prompt issue resolution. The streamlined process for lodging complaints through various channels remains consistent, ensuring accessibility and transparency.

(28) Section 7 of the OMP dated 23 January 2024 titled 'Local Engagement and Complaints'

Section 7.3 Engagement with Local Residents for the SNS on page **18 & 19** of the OMP dated 23 January 2024

Changes in OMP dated 4 March 2024

Moved to Section 8 on pages **15-19** of the OMP dated of the OMP dated 4 March 2024

Rationale for changes

Additional section added for local engagement, as above.

(29) Section 6 of the OMP dated 23 January 2024 titled 'Risk and Complaint Management of Activities on Site'

Section 6.6 Management of Congregation and Queuing on pages **15 & 16** of the OMP dated 23 January 2024 provides as follows:

The following measures are in place to manage any potential congregation and queuing of clients:

- 1. Signage directs clients to alternative services during non-operational hours and request that clients refrain from gathering outside the facility when it is closed.*
- 2. Due to local planning law and regulations, clients are not able to smoke around the back of the building. They often gather close by to the carpark on the side of the building to limit impact to surrounding private property.*
- 3. The Rights & Responsibilities policy has been amended to include a clause urging clients to respect our neighbours' comfort by not congregating around the Hub when it is not open. This document has been amended to note clients they cannot present earlier than 15min prior to the service opening to limit disruption and congregation.*
- 4. During operational hours, security personnel manage client flow and queuing to ensure orderly access to the facility and minimise any disruption to the local area. Doors open at 7pm sharp and clients promptly enter after that time.*
- 5. Clients who congregate outside are invited in during open hours or asked to move on respectfully. Persistent refusal is managed according to our incident escalation procedure, ensuring the well-being of all parties involved.*

This plan reflects Ruah's commitment to responsible property management, respecting our clients' needs while ensuring the safety and cleanliness of the community space around the facility.

Changes in OMP dated 4 March 2024

Reviewed and moved to Section 7.4 Management of Congregation and Queuing on page **13** of the OMP dated of the OMP dated 4 March 2024 which provides as follows:

The following measures are in place to manage any potential congregation and queuing of clients:

- 1. Signage directs clients to alternative services during non-operational hours and requests that they refrain from gathering outside the facility when it is closed.*

2. *Due to local planning laws and regulations, smoking is prohibited around the back of the building. Clients often gather close to the carpark on the side of the building to minimize impact on surrounding private property.*
3. *During operational hours, security personnel manage client flow and queuing to ensure orderly access to the facility and minimize disruption to the local area. Doors open promptly at 7pm, and clients enter promptly thereafter.*
4. *Clients who congregate outside are invited in during open hours or asked to move on respectfully. Persistent refusal is handled according to our incident escalation procedure, prioritizing the well-being of all parties involved.*

This plan reflects Ruah's commitment to responsible property management, respecting our clients' needs while ensuring the safety and cleanliness of the community space around the facility.

Rationale for changes

Additional details provided in amended version which shows enhanced measures to manage client congregation and queuing. It clarifies smoking regulations, directs clients to minimise disruption to surrounding private property, and consolidates client management under security personnel during operational hours. By prioritising well-being and responsible property management, this March version aligns with regulations and enhances community safety and cleanliness.

(30) Section 6 of the OMP dated 23 January 2024 titled 'Risk and Complaint Management of Activities on Site'

Section 6.8 Management of Antisocial Behaviour on page **16** of the OMP dated 23 January 2024 provides as follows:

Clients who self-present and gain a referral from a day centre attend the service at 7pm and must attend by 10pm. For emergency situations, clients can attend through the night when supported to the service via an emergency service. The clients who present in emergency presentations come based on need and attend through the front entrance. Based on our experience at Rod Evans, SNS allocated 5 placements for clients who were coming in emergency situations through police or ambulance. Therefore, the large majority of the clients present before 10pm and are settled for the evening at the SNS.

Changes in OMP dated 4 March 2024

Reviewed and moved to Section 7.6 Management of Antisocial on page **14 & 15** of the OMP dated of the OMP dated 4 March 2024 which provides as follows:

To enhance service efficiency and manage client flow effectively, clients are encouraged to coordinate with designated hubs during the day and present to the SNS between 7pm-10pm for planned visits. The main entrance, situated at the front on James Street, is intended for client use and will be managed by security officers at a reception, triage desk. This allows for a space where we assess risks and speak about rights and responsibilities in the service. This measure allows us to focus on emergency presentations after 10pm, ensuring that staff can dedicate the necessary attention to clients with present in emergency situations with urgent and complex needs. Encouraging early presentation supports the safety and smooth operation of the service, helping to manage the flow of clients efficiently throughout the evening.

Rationale for changes

The revisions are driven from recent feedback from the City of Perth and community stakeholders, focusing on operational responsiveness and service refinement. The amendment prioritises managing emergency presentations after 10pm, aligning with input received during plan development and service design updates. By prioritising emergency cases post-10pm, staff can provide focused attention to urgent needs, promoting safety and effective service delivery. Additionally, the emphasis on linking with designated hubs supports Ruah's mission to end homelessness and ensure ongoing support for clients accessing Specific Night Services (SNS) to connect with other services. The introduction of additional detail in section 5.2(1) of the 4 March document enhances operational efficiency, particularly in main entrance operations, facilitating coordinated client flow management and risk assessment.

(31) Section 7 of the OMP dated 23 January 2024 titled 'Local Engagement and Complaints'

Section 7 moved on pages **17 & 18** of the OMP dated 23 January 2024.

Changes in OMP dated 4 March 2024

Moved to Section 8 and added additional information on pages **15 & 16** of the OMP dated of the OMP dated 4 March 2024.

Rationale for changes

Changes driven by input from the City of Perth and stakeholders prioritise managing emergency presentations post-10pm, enhancing safety and service delivery. This aligns with Ruah's mission to end homelessness by linking clients with designated hubs for ongoing support. Detailed provisions in section 5.2 improve operational efficiency, emphasizing coordinated client flow and risk assessment at main entrances.

(32) Section 7 of the OMP dated 23 January 2024 titled 'Local Engagement and Complaints'

Section 7.2 Complaints Management on pages **17 & 18** of the OMP dated 23 January 2024 provides as follows:

N/A

Changes in OMP dated 4 March 2024

Addition of title in section 8.2 on page **16** of the OMP dated 4 March 2024 which provides as follows:

Independent complaints resolution - HaDSCO

Rationale for changes

Adding of title to clarify the purpose of the section.

(33) Section 7 of the OMP dated 23 January 2024 titled 'Local Engagement and Complaints'

Section 7.3 Engagement with Local Residents for the SNS on page **18** of the OMP dated 23 January 2024 provides as follows:

1. *Frequency of Engagement: We engage with the local community on a regular basis, scheduling monthly meetings and additional sessions as required. These engagements are an essential part of our operational calendar, not only to address concerns but also to proactively discuss our impact on local amenity and gather feedback.*
2. *Reasons for Engagement: The primary reasons for our engagement are to foster a collaborative relationship with our neighbours, to keep them informed of our activities, and to address any issues they may experience as a result of our operations. This includes discussing any community benefits we can provide and understanding their perspectives.*
3. *Proactive Engagement: Our engagement goes beyond the reactive complaints process. It is an initiative-taking effort to maintain transparency and to mitigate any potential disturbances our Hub might cause. Regular dialogue helps to pre-empt issues and sustain a positive community presence.*

Changes in OMP dated 4 March 2024

Section moved to 8.3 Engagement with Local Residents for the SNS on page **16** of the OMP dated 4 March 2024 which provides as follows:

Section removed and amendments made as below.

Rationale for changes

This section has undergone significant revisions due to refinements in the service model since the previous OMP (January version) was presented. The previous section has been replaced, and a new section has been added to address the specifics of the Community Advisory Group (CAG), emphasizing community safety. Details of this function have been included as Ruah has further developed and refined it since the January OMP version.

(34) Section 7 of the OMP dated 23 January 2024 titled 'Local Engagement and Complaints'

Section 7.3 on pages **18 & 19** of the OMP dated 23 January 2024 provides as follows:

Engagement with Local Residents for the SNS

The facility is located within a mixed-use area that includes residential properties. Recognising the importance of harmonious coexistence with our neighbours, the SNS service has been conscientiously designed to enhance the local community's safety and amenity. Our management strategies include the implementation of security patrols, enhanced lighting, and CCTV systems to foster a secure environment. Additionally, we have established protocols to minimise any potential disturbances during the after-hours operation of our services.

As part of our commitment to community engagement, we have built on our current processes at James St and have plans in place to continue the formation of a SNS Community Advisory Group (for James Street). This group serves as a platform for continuous dialogue and collaboration with local residents and stakeholders. The group's terms of reference have not been formally set, but are likely to encompass:

1. *Disseminating information about the SNS service and discussing matters that may affect both the SNS and the local community.*
2. *Engaging in consultation regarding operational aspects of the SNS that could potentially influence the residents' quality of life.*

3. *Providing a channel through which community concerns can be communicated, addressed, and tracked systematically.*

Our approach to local engagement is comprehensive, aiming to maintain a positive relationship with businesses, residents, and WAPOL enforcement.

Changes in OMP dated 4 March 2024

Revision to section 8.3 on pages **16 & 17** of the OMP dated 4 March 2024 which provides as follows:

8.3 Engagement with Local Residents for the SNS

Safe Night Space Community Advisory Group

Ruah have established the Community Advisory Group for James St, appointing Ms. Liz MacCleod as the groups independent chair. The Community Advisory Group serves as an advisory body to Ruah's Chief Executive, facilitating open discussions and sharing insights to inform decisions regarding the SNS. The Community Reference Group will meet with the intention to achieve the following objectives:

- *Facilitate open and constructive discussion about the service, fostering an environment where all members feel valued and heard, with a focus on the safety and well-being of women.*
- *Identify and prioritise key concerns, assessing their potential impact on the community, and collaboratively develop responsive strategies with the dual aim of keeping women safe from homelessness, violence, and the risks associated with being on the streets.*
- *Enable staff to inform the group about key developments, achievements, and outcomes of the service, ensuring transparency and shared understanding, particularly in areas related to protecting service users from homelessness and violence.*
- *Provide a platform for addressing concerns or exploring opportunities identified by the broader community, aiming to devise creative and responsible solutions that align with the service's objectives.*
- *Support the service in its objectives to increase awareness and education around the issues it addresses within the community, with a particular emphasis on promoting understanding, preventative measures, and the safety of women.*
- *Focus on collective solution-finding to unblock difficulties, enhancing community outcomes and ensuring the delivery of the service aligns with the needs and positive outcomes for the community, clients, and the service itself. This includes a dedicated effort to protect women from the dangers of homelessness and street violence, and to provide them with a safe and supportive environment.*
- *Develop strategies to enhance the integration of the SNS and the James Street hub within the community, fostering stronger connections and collaboration.*

The group operates based on principles of mutual respect, collaboration, transparency, and confidentiality.

Membership of the group comprises senior-level representatives from key stakeholders and organisations, ensuring diverse perspectives and expertise are considered. Members include an independent chair, Aboriginal leadership representation, City of Perth representatives, community and neighbour representatives, government agency representatives, WAPOL, healthcare stakeholders, and Ruah staff. The group conducts regular reviews of its composition to ensure alignment with service goals and community needs.

Members attend and participate in meetings, representing community views, respecting confidentiality, and must refrain from media commentary on proceedings. Operating procedures include having approximately 10 members, with the independent chair facilitating discussions and maintaining focus on objectives. Meetings are initially held fortnightly and later adjusted to monthly frequency as the service matures. Decision-making is encouraged through consensus, with a focus on resolving issues effectively.

Rationale for changes

The revised version introduces significant improvements in the engagement with local residents based on engagement work and feedback over the past months. The key change is the establishment of the Safe Night Space Community Advisory Group, chaired by Ms. Liz MacCleod. This group serves as an advisory body to Ruah's Chief Executive, facilitating open discussions and sharing insights to inform decisions regarding the SNS. The March iteration specifies the objectives of the Community Advisory Group, with a particular focus on the safety and well-being of women. Furthermore, the March version outlines the membership of the group, which comprises senior-level representatives from key stakeholders and organisations, ensuring diverse perspectives are considered in decision-making processes. The inclusion of Aboriginal leadership representation, City of Perth representatives, and healthcare stakeholders highlights a more comprehensive approach to community engagement. Additionally, based on feedback and developed thinking around the needs of the CAG since January - the March version emphasises the groups need for confidentiality and consensus-driven decision-making, promoting transparency and effective problem-solving. The March version represents a more structured and collaborative approach to community engagement, aligning with Ruah's commitment to enhancing safety and community outcomes.

(35) Section 8 of the OMP dated 4 March 2024 titled 'Local Engagement and Complaints'

Changes in OMP dated 4 March 2024

Changes to Section 8.4, Minimising impact on the local surroundings on page **17** of the OMP dated 4 March 2024 which provides as follows:

Our internal practice guides detail information and practical guidance for staff on the following specifics which relate to how we work in the SNS model. Our procedures for managing disruptions after hours include immediate communication with our security team and, when necessary, engagement with the local police. Specific details outlined below:

- 1. Security Strategies and Extent: Our security measures, including patrols, and CCTV, are implemented not only within but also around the perimeter of our building. The goal is to deter antisocial behaviour and to minimise disruptions after hours. These strategies extend to the immediate areas surrounding the facility where our clients and the local community interact. We have recently installed additional lighting to further increase visibility and therefore increase safety around the area.*
- 2. Our security personnel conduct regular patrols that extend around the entire perimeter of the building. These patrols are not confined to the structure itself but also cover adjacent areas to ensure a comprehensive security presence. This proactive approach allows us to address concerns and potential issues before they escalate.*
- 3. In the event of an incident, our procedures include immediate assessment via CCTV, engagement of security personnel to the location, and if necessary, prompt communication with WAPOL.*

4. *Our CCTV system has high visibility and covers the entire site. The cameras are positioned strategically to monitor all activities, providing real-time tracking capabilities. This allows us to swiftly respond to any incidents and maintain a secure environment.*
5. *We have a direct line with our regular contract at WAPOL, with whom we communicate frequently—often daily—to continue our positive relationship and ensure a coordinated response to any incidents.*
6. *Complaints Policy: For non-urgent issues, community members are encouraged to use our online system to register complaints, which allows us to track and systematically address each concern. For urgent matters, especially those concerning safety, the direct engagement with WAPOL is advised.*
7. *Direct Police Engagement: We maintain a direct and responsive relationship with WAPOL, ensuring that any antisocial behaviour or safety issues are promptly communicated to the appropriate authorities, leveraging our established rapport with the sergeant in charge.*
8. *The Safe Night Space (SNS) service includes a mechanism specifically designed for addressing community concerns related to the service during its operational hours. This system enables the community to alert SNS staff via text about situations such as a perpetrator outside the building or any other service-related issues. Upon receipt of such alerts, the staff will assess the situation to decide whether the involvement of Police or City Rangers is warranted. A designated phone line is established to receive these text messages, ensuring that community concerns are promptly addressed. For issues requiring a more detailed response, community members are encouraged to use the connecting@ruah.org.au email address. This approach ensures that all community concerns relating to the service are managed effectively and efficiently.*

Through these measures, we aim to ensure that the SNS is not only a safe place for our clients but also a responsible and responsive neighbour to the residents of the area.

Rationale for changes

The changes in the March OMP particularly in Section 8.4, signify a significant enhancement in the approach to minimising the impact on the local surroundings. These revisions introduce detailed procedures aimed at improving security measures and community engagement, ensuring SNS service operates responsibly and responsively. The inclusion of enhanced security strategies, such as extended patrols and high-visibility CCTV coverage, reflects a proactive approach to deterring antisocial behaviour and maintaining a secure environment. Additionally, the establishment of a direct line of communication with WAPOL and the introduction of a mechanism for addressing community concerns during operational hours demonstrate a commitment to effective collaboration and swift response to incidents. These improvements enhance the overall safety and responsiveness of the SNS service, aligning with Ruah's mission to be a responsible and responsive neighbour to the local community. These changes were implemented based on operational feedback from recent community engagement, discussions with the CoP and reflections from operating the SNS at Rod Evans Centre. Each change aims to refine the OMP through practical experience, aligning service delivery with evolving needs and stakeholder feedback. The revised OMP (4 March 2024) reflects an improvement in clarity, service responsiveness, safety protocols, and community engagement strategies. The differences underscore a shift towards a more dynamic and adaptable service model, supported by operational data from REC.