

# **Draft State Public Health Plan for Western Australia 2025-2030**

**WALGA Submission**

**March 2025**

## Table of Contents

1.	Introduction .....	3
2.	Context .....	3
3.	Overarching objectives .....	4
4.	Priorities and action areas .....	5
5.	General Comment .....	8
6.	Conclusion .....	8

## 1. Introduction

The Western Australian Local Government Association (WALGA) welcomes the opportunity to provide a submission to the WA Department of Health on the draft State Public Health Plan (SPHP) on behalf of the Western Australian Local Government sector.

WALGA is an independent, member-based, not-for-profit organisation representing and supporting the WA Local Government sector.

Our membership includes all 139 Local Governments in the State. WALGA uses its influence, support and expertise to deliver better outcomes for WA Local Governments and their communities.

We do this through effective advocacy to all levels of Government on behalf of our Members and by the provision of expert advice, services and support to Local Governments.

WALGA's vision is for agile and inclusive Local Governments, enhancing community wellbeing and enabling economic prosperity.

The Local Government sector in WA is diverse. There are 139 Local Governments across metropolitan and regional WA, varying in geographical size and population base. As a result, there is a significant diversity in the range of functions and services provided by Local Government, depending on the size and location of the Local Government.

The SPHP is broad-ranging and has significant implications across multiple business areas of Local Governments. In this context, the compressed consultation period was not the expected six weeks, and this made consultation with our Members challenging. WALGA appreciates the Department of Health granting an extension to provide this submission.

## 2. Context

WALGA's submission considers the draft SPHP as it relates to our Member Councils and the requirement to prepare and publish Local Public Health Plans (LPHPs) by 4 June 2026 under Stage 5 of the *Public Health Act 2016*. This submission has been informed by the WALGA Local Government Public Health Reference Group.

WALGA's submission aligns to WALGA [advocacy position 3.2.1 Local Public Health Plans](#) which states:

WALGA supports the objects and principles of the Public Health Act 2016.

The State Government must ensure that:

1. Guidance, tools and resources are developed to support the development of Local Public Health Plans; and
2. Funding is provided for:
  - a) smaller rural and regional councils to support the development of Local Public Health Plans; and
  - b) the implementation of actions under Local Public Health Plans.

*September 2024*

This submission builds on WALGAs membership of the Public Health Planning Reference Group as well as previous WALGA submissions on:

- the Draft objectives and priorities for the upcoming State Public Health Plan (September 2024)
- Draft Public Health Planning Guide for Local Government (November 2024)

---

WALGA thanks the Department of Health for the extension to provide this submission following the reduced consultation period. WALGA requests that the Department of Health ensures future consultation periods allow adequate time for member-based organisations such as WALGA to thoroughly consult with their membership.

### **3. Overarching objectives**

WALGA welcomes the repositioning of Equity and Inclusion as an overarching objective alongside Aboriginal Health and Wellbeing, as recommended in our submission on the Public Health Plan Objectives and Priorities (September 2024). This positioning elevates and reinforces the need for equity and inclusion measures to be embedded across each of the priority areas and actions.

WALGA strongly encourages the SPHP state clearly that the objectives and priorities provide a framework for Local Governments to develop LPHPs as relevant to their local circumstances rather than an expectation to include them all. Furthermore, WALGA considers it essential that the SPHP is accompanied by a sustained State Government commitment to the provision of practical resources and guidance for Local Government and ongoing funding to support LPHP initiatives. WALGA looks forward to continuing our collaborative efforts with the Department of Health and other stakeholders to shape the development of these supports.

- WALGA recommends developing prioritised, clear and targeted actions under both overarching objectives that can inform LPHPs.

#### **Aboriginal health and wellbeing**

The alignment of the objective of Aboriginal health and wellbeing to other WA Government strategies and frameworks is clear in the overview on page 14-15 and will be imperative for implementation. Further context on how the Aboriginal Health and Wellbeing Framework 2015-2030 can provide a comprehensive framework for addressing racism and strengthening the cultural determinants of health for Aboriginal people in WA would be beneficial.

WALGA recommends:

- that the current emphasis on the Department of Health's Aboriginal Health and Wellbeing Framework 2015-2030 be balanced with more information on how the Framework can be applied in the context of public health planning.
- providing clarity on tracking relevant actions that will achieve Aboriginal health and wellbeing outcomes embedded throughout the various priorities in the SPHP. These actions could be included in a consolidated appendix for ease of reference.

#### **Equity and Inclusion**

Similar visibility and alignment to key State Government strategies regarding equity and inclusion should be included in the SPHP. WALGA notes that the current draft does not reference the WA State Disability Strategy or Disability Access and Inclusions Plans.

WALGA would welcome the opportunity to work collaboratively with the Department of Health and Department of Communities to ensure a coordinated approach to information sharing with Local Governments on this issue and avoid duplication of effort.

WALGA recommends:

- the overview of the equity and inclusion objective note the relevance of the State Disability Strategy and identify opportunities to align and integrate Public Health

---

Plans with mandated Disability Access and Inclusion Plans at the State and local levels.

- the SPHP adopt consistent terminology throughout the document when referring to 'at-risk' and 'high-risk' groups. These terms are currently used interchangeably.

#### **4. Priorities and action areas**

##### **PROMOTE: Foster strong communities and healthier environments**

WALGA supports the emphasis on the link between the natural environment, human health and community engagement promoted in the SPHP.

Specific comments relating to the numbered priorities under the PROMOTE objective are provided below:

- 1. Ensure public health risks are considered and addressed in planning and development policies and approval processes to facilitate healthy living and minimise impacts from public health hazards*

WALGA supports the emphasis on incorporating public health into all aspects of planning and development. Successful implementation will require further consideration of how to integrate these elements into the existing planning framework. The introduction of legislative requirements in this space would empower Local Governments to implement the positive changes our Member Councils are already keen to make for their communities.

WALGA recommends:

- including gambling and alcohol establishments in the action areas as a consideration for planners, alongside food establishments.
- expanding the definition of 'industrial' to include petrol stations in the action focused on 'ensuring minimum separation distances'.

- 2. Optimise mental health and wellbeing*

- WALGA recommends including the relevance of Work Health and Safety legislation to the achievement of this priority and implementation of the SPHP.

- 4. Improve understanding and use of genomic information to promote population health*

- WALGA recommends moving the genomic information priority to the ENABLE objective due to its technical nature and broader focus on research and innovation.

##### **PREVENT: Reduce the burden of chronic disease, communicable disease and injury**

Throughout this priority, WALGA suggests emphasising the benefits of a trauma-informed response in addressing concerns for at-risk cohorts, to help achieve the overarching objective of equity and inclusion.

Specific comments relating to the numbered priorities under the PREVENT objective are provided below:

- 1. Reduce use of tobacco, vapes and related products*

- WALGA recommends including a specific action to reduce vaping by youth, as this is recognised as a growing challenge in the introductory text.

---

## **PROTECT: Protect against public and environmental health risks, effectively manage emergencies, and lessen the health impacts of climate change**

Specific comments relating to the numbered priorities under the PROTECT objective are provided below:

### *1. Manage the effects of climate change on people's health and reduce the health system's environmental footprint*

While it is encouraging to see climate change identified as a priority within the SPHP, it is important that the scope of the climate change priority be better defined to clearly articulate expectations and provide tangible direction for Local Government LPHPs. WALGA seeks further information on how the SPHP will build on, and make use of, existing data and adaptation plans in development by both Australian and State Government agencies, particularly those focused on health and human services. WALGA encourages the State Government to consider how the SPHP climate change priority will acknowledge and intersect with existing planning and reporting requirements at both the State and Local tiers of Government relating to emergency management and climate adaptation plans to reduce administrative burden and foster collaboration and consistency.

WALGA requests that the Department of Health consults WALGA in the development of any guidance and resources for Local Governments on how this priority might be implemented at the local level to ensure clarity and understanding about the remit and responsibilities of Local Governments in this context.

WALGA recommends:

- that the scope of the climate change priority be further defined to clearly articulate expectations and provide tangible direction for Local Government LPHPs.
- that the climate change priority aligns and builds on existing data and adaptation plans in development by both Australian and State Government agencies to avoid duplication and administrative burden.

For communities in both metropolitan and regional areas, heat is the primary climate change risk. Responding to this critical issue needs to be framed broadly and overtly within the SPHP to reflect its importance and potential impact on public health.

- WALGA recommends that the action 'promote heat action plans and awareness programs for managing extreme weather impacts.' (p.37) under the heading 'Adaptation' is amended to recognise the need to develop comprehensive heat action across planning, mitigation and adaptation actions.

### *2. Prevent, monitor, and control notifiable infectious diseases*

- WALGA recommends the following action be incorporated: conduct a horizon scan to identify future biosecurity risks to human health and map the potential in the context of climate change.

### *3. Provide sustainable disaster and emergency management across Prevention, Preparedness, Response and Recovery (PPRR) phases*

Asbestos management remains an ongoing and escalating challenge for Local Government, particularly during and after emergency events.

- 
- WALGA recommends that the SPHP prioritise the prevention of asbestos-related diseases, in collaboration with other State Government agencies and Local Government.

### **Appendix 3: Roles and responsibilities of the Department and Health Service Providers (HSPs) in supporting Local Governments with public health planning**

WALGA appreciates the clarity provided in Appendix 3 regarding the roles and responsibilities of HSPs in supporting Local Governments to develop and implement their LPHPs.

Supporting Local Governments to develop LPHPs is critical to the successful implementation of Stage 5 of the *Public Health Act 2016*. WALGA suggests providing details on the type of support available to build capacity for Local Government and additional funding to support implementation. Beneficial supports may include assisting with consultations, helping to collect and interpret data, or attending stakeholder consultation workshops.

As repeatedly highlighted in the SPHP, health risks often disproportionately affect residents living in regional, rural and remote areas, which can be compounded by a lack of health and other services in these areas. WALGA has observed that, while there is strong collaboration and service coverage by metropolitan-based HSPs, many of the Local Governments most in need of support are in rural and regional areas which falls under the responsibility of the West Australian Country Health Service (WACHS). WALGA has consistently advocated for equitable access to support and funding for external support for Local Governments in their preparation of LPHPs, particularly those operating outside metropolitan areas.

WALGA recommends:

- adding a brief introduction to Appendix 3 to provide context on the collaborative work between the Department of Health, and HSPs, including the WA Country Health Service.
- HSPs are resourced and supported by the Department of Health to undertake the roles and responsibilities set out in Appendix 3. This is particularly important for HSPs supporting Local Governments with limited capacity and/or expertise in public health planning.
- including responsibility for HSPs to better coordinate and share LPHP resources and guidance to ensure equity of support, especially for smaller rural and regional Local Governments.
- that Appendix 3 be included in the updated *Public Health Planning Guide for Local Government*.

WALGA notes that the current legislation allows for the addition of future reporting via Regulations under Section 22 of the *Public Health Act 2016*, however, none are currently in place. The current drafting on compliance, monitoring and evaluation within appendix 3 could be interpreted as implying that there has been a decision to develop new additional reporting criteria during the period of the SPHP. Any further reporting requirements should be accompanied with compensation for the additional administrative burden.

WALGA recommends:

- 
- that Appendix 3 subsection 'Compliance, monitoring and evaluation' is amended from 'developing reporting criteria required under section 22 of the Act' to 'contribute to (or support) reporting required under section 22 of the Act'.
  - that no future reporting requirements be introduced.

## 5. General Comment

WALGA is pleased to see the SPHP acknowledge the importance of Local Governments in the implementation of Stage 5 of the *Public Health Act 2016*, as reflected through our ongoing collaboration and membership on the State Public Health Planning Reference Group.

WALGA notes the broad-ranging priorities and actions under the SPHP will require leadership from multiple State Government agencies to implement. It is vital that all relevant State Government agencies are informed, resourced, ready and able to support Local Governments to align their LPHP with the SPHP across operational areas as diverse as planning and development, waste, sport and recreation facilities, community development and environmental health.

The broad scope of the SPHP offers positive opportunities for holistic and integrated approaches to public health planning at the local level. However, this will also create additional resourcing and capacity challenges for smaller Local Governments. As WALGA has reiterated throughout the development of the SPHP, **it is vital that Local Governments, particularly smaller rural and regional authorities, are adequately resourced and supported to achieve equitable public health outcomes for their communities.**

WALGA recommends that the SPHP:

- champions collaboration between all tiers of government to maximise public health outcomes or Western Australia.
- further emphasises the need for whole-of-government coordination and collaboration in the implementation of the SPHP, and this coordination extends to supporting the Local Governments in the development of LPHPs.

## 6. Conclusion

WALGA appreciates the opportunities provided by the Department of Health to inform the development of the SPHP and supporting documents on behalf of the Western Australian Local Government sector. We look forward to continuing to work closely with the Department of Health and HSPs to ensure that the SPHP and aligned LPHPs provide a positive mechanism to increase local context public health outcomes for communities across Western Australia. This outcome will be intrinsically linked to the level of resourcing, support and funding provided to HSPs and Local Governments.

For enquiries on this Submission please contact Christina Colegate, Senior Policy Advisor Community, at [ccolegate@walga.asn.au](mailto:ccolegate@walga.asn.au) or (08) 9213 2523.