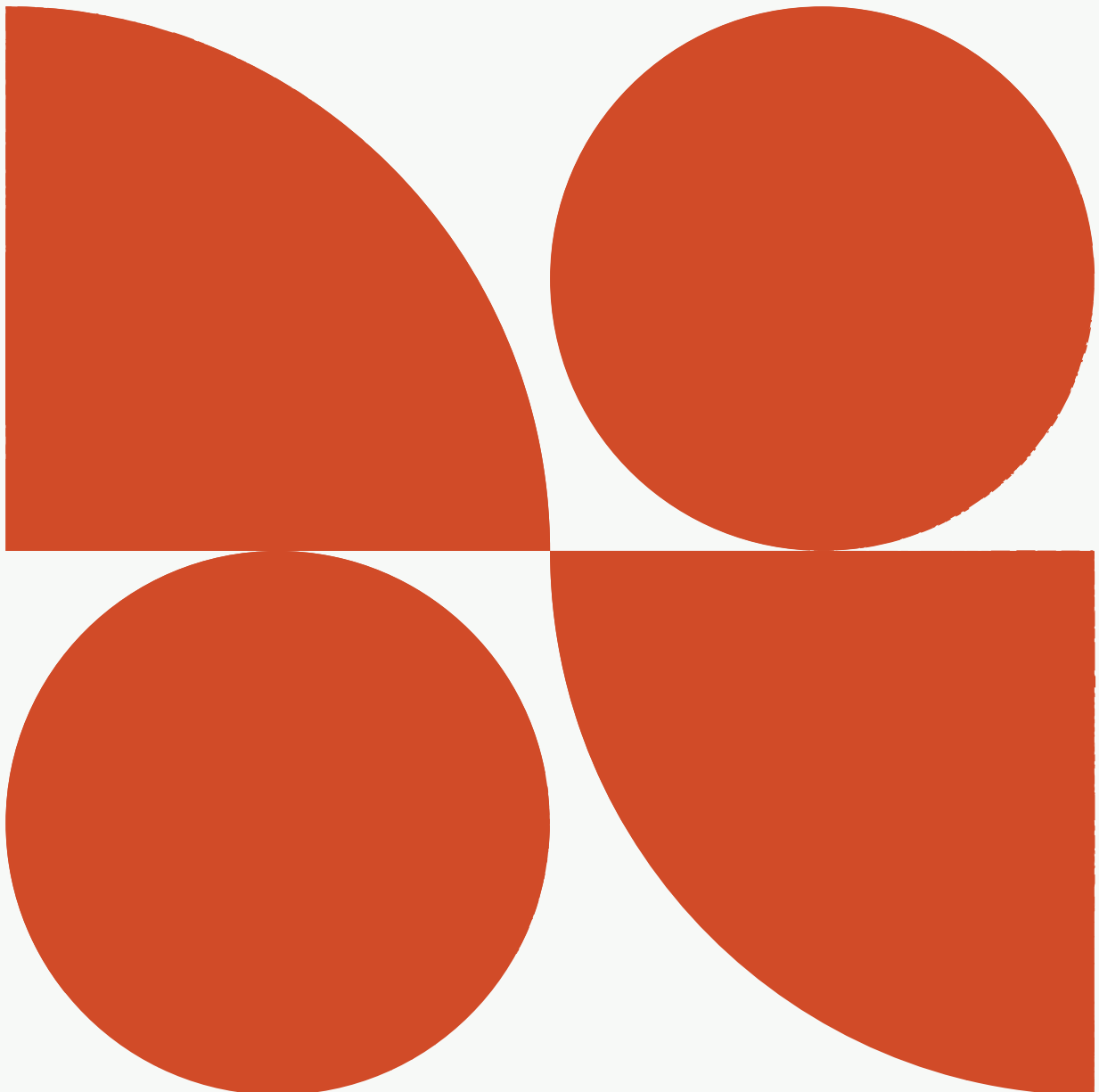


# Submission

# Consistent Local Planning Schemes Consultation



## Acknowledgement of Country

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WANADA acknowledge the traditional custodians of Country on which this submission was developed, the Whadjuk people of the Noongar Nation. We acknowledge their continuing and unbroken connection to land, sea and community. We pay our respect to their culture and their Elders, past and present and acknowledge their ongoing contribution to WA society and the community.

## About WANADA

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The Western Australian Network of Alcohol and other Drug Agencies (WANADA) is the peak body for the specialist alcohol and other drug education, prevention, treatment and support sector in Western Australia. WANADA is an independent, membership-driven, not-for-profit association, currently representing 65 organisations across WA. A [full list of WANADA members](#) is available.

WANADA is driven by the passion and hard work of its member organisations, which include community alcohol and other drug counselling; therapeutic communities; residential rehabilitation; intoxication management; harm reduction; peer based; prevention; and community development services.

## Key Points

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- WANADA wishes to respond to Part A – Land Uses Terms (& Associated Definitions) (*Table 2 (Page 12 – 13) and Appendix A of the Stakeholder Consultation Report*) only.
- *Community purpose* is the only appropriate land use type for alcohol and other drug services.
- Alcohol and other drug services are community based services. Those who access these services form part of the community, and these services exist to benefit their community. There is a need for this support in every local government area of WA.
- Alcohol and other drug services take many forms. These services are not limited to residential programs or therapeutic communities, with many being non-residential services providing counselling and other similar services.
- Excluding these services from the *community purpose* land use type will make obtaining approval more problematic and may provide opportunity for local councils to discriminate against alcohol and other drug services via land use type restrictions within zones.

## WANADA's Position

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WANADA welcomes the opportunity to respond to the Consistent Local Planning Schemes Consultation. WANADA wishes to respond to Part A – Land Uses Terms (& Associated Definitions) (*Table 2 (Page 12 – 13) and Appendix A of the Stakeholder Consultation Report*) only.

Strong Western Australian communities are supported when local and state governments work together to strive towards equity, fairness, and consistency in their systems. Planning systems are a significant aspect of this, and ultimately function to benefit the communities they serve.

WANADA recognises the need for a robust, consistent and transparent planning process. WANADA is concerned, however, regarding the proposed exclusion of alcohol and other drug rehabilitation services from the definition of *community purpose* land use. *Community purpose* is the only appropriate land use type for many alcohol and other drug services.

There is a community need for these services – both for those attending the service and for the wider community. Providing alcohol and other drug services aligns with several state and federal government

strategies<sup>1,2</sup> and is evidenced to result in significant community benefit by providing community members with support, as well as reducing pressure on our health, justice and human service systems.<sup>3</sup> It is important to note that alcohol remains the most harmful drug across WA, and approximately 1 in 4 Western Australians drink to levels that are high-risk to result in long-term alcohol-related harms, including developing cancer or other diseases.<sup>4</sup> Alcohol and other drug services play a significant role in reducing this risk of harm to the over 500,000 Western Australians who fit this high-risk category.<sup>5</sup>

Alcohol and other drug services are community services, are approximately 90% not-for-profit,<sup>6</sup> and take many forms. These services are not limited to residential programs or therapeutic communities, with many being non-residential services providing counselling and other similar services.

Those who access these services form part of the community, and these services exist to benefit their community. There is a need for this support in every local government area of WA. Excluding these services from the *community purpose* land use type will make obtaining approval more problematic. Additionally, creating an alcohol and other drug service specific land use type may provide opportunity for local councils to discriminate against services via land use type restrictions within zones. There is also concern that alcohol and other drug services currently utilising the *community purpose* land use type may face restrictions regarding expansion, and its exclusion may set a precedent for exclusion of other community services from the land use type.

There are currently not enough alcohol and other drug services to meet demand in WA – with approximately only one third of community demand met.<sup>7</sup> Complicating the planning process specifically for these services is likely to impact on service establishment and capacity, impacting their ability to support the community.

Whilst WANADA supports the WA government streamlining local planning schemes to support consistency across all local government areas, we request that alcohol and other drug services remain within the *community purpose* land use type.

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<sup>1</sup> WA Mental Health Commission (2018) [Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015-2025](#).

<sup>2</sup> Australian Department of Health (2017) [National Drug Strategy 2017-2026](#).

<sup>3</sup> Australian Institute of Criminology (2022) [What are the monetary returns of investing in programs that reduce demand for illicit drugs?](#), *Trends & issues in crime and criminal justice*.

<sup>4</sup> WA Department of Health (2021) [Health and wellbeing of adults in Western Australia 2020](#).

<sup>5</sup> Note: based on 2021 Census, which estimated WA's adult population to be over 2,000,000 – Australian Bureau of Statistics (2022) [Regional population by age and sex](#).

<sup>6</sup> Australian Institute of Health and Welfare (2022) [Alcohol and other drug treatment services in Australia annual report](#).

<sup>7</sup> WA Mental Health Commission (2018) [Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015-2025](#), figure 21 & 23.