

11 July 2024

The Territory Planning Authority  
ACT Environment, Planning and Sustainable Development  
[terrplan@act.gov.au](mailto:terrplan@act.gov.au)

To whom it may concern,

### **Support for Minor Amendment MA2024-i**

This letter, on behalf of the Australian Veterinary Association (AVA), ACT Division, is to support the proposed **Minor Amendment MA2024-I Various changes to zone and district policies and dictionary definitions.**

The AVA is the national organisation representing veterinarians in Australia. Our members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals, such as cattle and sheep, and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association. The AVA members include many of the ACT 320 registered veterinarians, and the owners and staff of the 46 ACT registered veterinary premises.<sup>1</sup>

Veterinarians provide diagnosis and treatment (including surgery), healthcare, husbandry and behaviour advice to the approximately 69% of ACT households owning a companion animal and provide significant community good through *pro-bono* work or discounted services, including the care of stray animals and wildlife presented to our clinics, and through charity work to people experiencing disadvantage and vulnerabilities<sup>2</sup>.

Veterinary practices provide employment to between 2 and 5, or more, staff *for each veterinarian* working in the facility.

Animals are part of the triad that forms our One Health view – Humans, Animals and the Environment - each part impacts the others in relation to health and wellbeing, and each must be protected, cared for, and nurtured.

We discovered with alarm, that the ACT Territory Plan had been amended in late 2023 such that existing Veterinary Clinics, previously allowed under E4 - the Community Facility Zone Policy, were no longer recognised as eligible under this Section. This was because the definition of “Veterinary Clinic” had been amended, and the phrase removed from that section of the Territory Plan; compare section 2023-540 from [27 September 2023](#) with that of [27 November 2023 – 4 December 2023](#) .

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<sup>1</sup> <https://www.cityservices.act.gov.au/pets-and-wildlife/veterinary-practitioners-board/register-of-veterinary-practitioners-and-veterinary-premises>

<sup>2</sup> <https://www.petsinthepark.org.au/act>; <https://www.actpetcrisis.com/tiny-veterinary-clinic.html#/>

#### **The Australian Veterinary Association Ltd**

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This had two clear implications:

- 1) Existing Veterinary Clinics would no longer be allowed to practise in their current location on expiration of their existing commercial (or Territory) lease and
- 2) It would be impossible for new Veterinary Clinics to be established in these areas unless a variation to the site's Crown Lease was applied for and granted.

This change left current and prospective veterinary business owners in an unenviable situation where they could lose permission to use their existing (or prospective) site, with the risk of lack of health and welfare care for animals, loss of amenity for their owners, and unemployment for the many staff employed. This at a time when veterinarians face increasing demand as well as difficulty recruiting staff to the ACT.

Therefore, we welcome the proposed amendment MA2024-I, to include "veterinary clinics" under the definition of "community use" and thus to allow continuation of service and business to existing veterinary clinics, as well as hope for prospective veterinary business owners that they can establish clinics in areas with this designation.

We thank Ministers Steel and Cheyne for their understanding and willingness to propose and support this amendment.

We would however like to register our deep concern that the Territory Plan appears to have been amended without direct consultation with key stakeholders, including the AVA, which is the professional association representing community members who provide essential veterinary services to many Canberrans and their animals. If the AVA was not consulted, we question whether the ACT Veterinary Practitioners Board, the statutory authority responsible for registering veterinarians and veterinary premises, was included in the process. We also ask if the veterinarians affected by this change were consulted?

We give our full support to **MA2024-i – Various changes to zone and district policies and dictionary definitions** to amend the definition of 'community use' to clarify that 'veterinary clinic' is a form of community use by including it in the definition.

Further, we request that the Australian Veterinary Association be consulted before changes with such serious implications for ACT veterinarians, their clients, and the many thousands of animals in their care, are considered or enacted.

If officers of the Department of Environment, Planning and Sustainable Development would like to discuss this further, please email [publicvetaffairs@ava.com.au](mailto:publicvetaffairs@ava.com.au).

Yours faithfully



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*Dr Michael Hayward is also a Director of Gungahlin Veterinary Hospital, and a Director of the company holding the lease for these premises.*

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