

Australian Smart Communities  
Association  
ABN 32 170 196 056

[Website](#)



**Re: Consultation on proposed changes to provide better mobile connectivity in new developments**

Dear Australian Government (Department of Infrastructure, Transport, Regional Development, Communication and the Arts),

The Australian Smart Communities Association (ASCA) is Australia's only not-for-profit peak body dedicated to advocating on behalf of governments for smart communities in Australia. ASCA works closely with our members across all levels of government to solve problems, enhance policy, capacity, and confidence, and create innovative smart solutions for their communities.

Being at the forefront of smart city deployments, our members have a strong interest in the cost-effective deployment of a wide variety of small energy-consuming devices in the public domain. This includes not just smart street lighting but an array of other smart infrastructure, smart city sensors, CCTV, public Wi-Fi, dynamic signage, autonomous vehicle infrastructure, telecommunications equipment and Electric Vehicle charging infrastructure.

ASCA's welcome the current consultation on the Telecommunications in New Developments (TIND) Policy and its impact on mobile coverage in new home builds for new developments or to support expanding suburbs, and critical access to be able to call Triple Zero outside of their premises.

ASCA provides support and suggestions to the proposed amendments to the 2020 TIND Policy recognising the opportunity and impact this brings to utility providers, land developers and apartment and homeowners to deliver suitable solutions that do not further inflate land, apartment and house prices.

It is vital that the Australian Government collaborate with stakeholders to ensure sustainable solutions are delivered via this policy, doing so via a series of funded pilots may help sharpen more effective policy reforms for the mid to long term.

Should you have any questions about this submission, please contact ASCA Vice President James Sankar on [REDACTED] for further correspondence.

Yours faithfully,

[REDACTED]

Bruce Marshall

James Sankar

ASCA President

ASCA Vice President

On behalf of the ASCA Board of Directors.



## **ASCA Response to 2011 TIND policy changes under consultation as at 6/11/2023**

**Should the possible changes be adopted in full, in part, or not at all? Please provide any reasons for your recommendation if you choose in part or not at all.**

Changes should be adopted in full and as a minimum to not adopt 4G but instead futureproof with 5G connectivity. Furthermore, we believe that complementary broadband (e.g. fibre-optics) and smart technology infrastructure such as sensor-based networks, smart lighting (multi-functional poles) and solutions to decarbonise spaces such as smart grid and electric vehicle charges should be included in this mix. It is important to ensure that these costs do not result in a premium price for land and ensure that affordable housing is still achieved to bridge the digital divide. Ownership of the infrastructure should be passed onto local government (LGA) with the data generated and safeguarded, being handled by an elected body such as an LGA where the lifetime cost of the infrastructure can be offset by the value of the closed data (e.g., enhanced digital twin visualisations) it shares with third parties and open data with the local community.

**Are there other criteria that could be considered as well?**

Please see above.

**Do you believe these proposed amendments will achieve the aim of encouraging mobile telecommunication infrastructure to be available in new developments when residents initially move in? If not, what suggestions or alternative approaches do you think would achieve the outcome more effectively?**

It depends on the accessibility to affordable backhaul infrastructure from the development site to national telecom and energy networks. Where there are challenges connecting to these locations, the federal government should provide funding to support this and extend the NBN/National Energy grid footprint.

**Do you have any concerns regarding compliance with the proposed changes to the TIND Policy that you would like to raise?**

Compliance requires selected use of industry and internationally adopted standards; a Working group of community (ASCA) and industry groups can facilitate the development of technical and operational standards and compliance frameworks to support this initiative.

**Is the proposed timeframe for engagement with a possible carrier, that is, at least twelve months before the first units or homes in the development are due to be occupied, reasonable in your view?**

Land Developer and Utility providers plan investments longer than 12 months and are tied to viable business plans, therefore developers will need to work with the state and federal government to accommodate these additional provisions in a way that can ensure land prices remain affordable.

**If not, please suggest an alternative timeframe and please provide any reasons for your recommendation.**

ASCA recommends any short-term impacts be accommodated with funding to trial the impact of possible amendments to the Telecommunications in New Developments Policy – Mobile Connectivity and Other Measures. The revised policy, quality and viable cost models can then be scaled appropriately.