



1 November 2023

The Director  
Telecommunications Deployment Policy Section  
Department of Infrastructure, Transport, Regional Development, Communication and the Arts  
GPO Box 594  
Canberra  
ACT 2601

## Re: Telecommunications in New Developments (TIND) change submission

The City of Casey is Victoria's most populous municipality. Home to more than 390,000 residents, our population is forecast to grow to more than 550,000 by 2041.

The City of Casey is home to a growing number of residents living in mobile blackspots. The detrimental social and economic impact of poor mobile coverage is particularly being felt by community members in our fast-growing suburbs of Clyde and Clyde North.

As part of our *Connecting Casey* advocacy campaign, the City of Casey has continued to advocate for the critical projects and services our community needs and deserves, including improved mobile connectivity across our city. We recognise that improved connectivity is needed to cater for current and future growth and to support our community to become more connected and resilient.

### ***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:***

City of Casey (Council) strongly supports the proposed changes to the Telecommunications in New Developments (TIND) policy, as described in "Consultation Paper: Possible amendments to the Telecommunications in New Developments Policy – Mobile Connectivity and Other Measures" and recommends that the mobile connectivity changes should be adopted in full. Council appreciates this opportunity to provide feedback towards this policy change at the federal level.

City of Casey is an area of high growth, expecting approximately 160,000 new residents to move in by 2041. It is paramount that our current and future residents are provided access to all utilities and telecommunications services.

Access to adequate mobile connectivity is a known issue in the City of Casey's growth areas, such as Clyde North, where multiple residents have complained to Council regarding the poor mobile service, or lack thereof, in their new residences.

In some cases, residents haven't been able to contact emergency services for help. For other residents, this causes challenges with working from home or accessing online services

**Web:** casey.vic.gov.au  
**Email:** caseycc@casey.vic.gov.au  
**Phone:** 03 9705 5200  
**Post:** PO Box 1000, Narre Warren VIC 3805  
**NRS:** 133 677 (for the deaf, hearing or speech impaired)

**Customer Service Centre:**  
**Narre Warren:** Bunjil Place, Patrick Northeast Drive  
**Cranbourne:** Cranbourne Park Shopping Centre  
**ABN:** 43 320 295 742



**TIS:** 131450 المترجم الفوري 翻译 مترجم شفاهى ਦੁਆਰੀਆ ಉಚ್ಚಲ ಪರಿವಹಣ



and having no backup option if there are fixed-line dropouts. Council has advocated strongly in the past for improved telecommunications and mobile connectivity for these areas through programs such as Connecting Victoria, but the problems still exist so any opportunity to make a change and improve the lives of our residents and communities is welcome.

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

Council believes that more emphasis needs to be provided to distinguish between network coverage with network capacity. The policy amendments encourage consumers to “to check with their carrier to see if there is existing or proposed coverage in their development”. Due to the current and predicted growth in areas of development within Casey, despite the core mobile carriers showing mobile network coverage on their network maps, the lived experience is very different. This is due to the diminished capacity of current infrastructure within those areas, unable to keep up with the level of growth.

The TIND policy needs to be clear that it isn't only about coverage, but provisions need to be made to ensure that the required network capacity is available to meet future demand, which may mean that additional infrastructure needs to be deployed within the development area.

***Do you believe these proposed amendments will achieve the aim of encouraging mobile telecommunication infrastructure being 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?***

Council believes that collaboration between developers and mobile telecommunications providers is key to achieving these aims as set out in the policy. Mobile connectivity should be considered as important a utility as water, electricity, and sewerage. It is clear from the proposed policy changes that the government's expectation moving forward is that developers provide reasonable planning efforts to ensure it is available in new housing by the time that residents move in, much like the other basic utilities. Council hopes that appropriate measures will be taken to educate all developers and mobile telecommunications providers of these policy changes, if they are implemented.

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

Council believes that this proposed policy change is an important first step in encouraging mobile telecommunication infrastructure to be made available in new developments, but as this is a policy change only and not a change to regulation, there is a strong possibility that this may not be adopted or considered by all developers.

To affect meaningful change, Council strongly encourages that provisions be made to update legislation to mandate the incorporation of mobile telecommunication infrastructure in new developments so that all future communities are set up with the mobile connectivity they would expect.

**Web:** casey.vic.gov.au  
**Email:** caseycc@casey.vic.gov.au  
**Phone:** 03 9705 5200  
**Post:** PO Box 1000, Narre Warren VIC 3805  
**NRS:** 133 677 (for the deaf, hearing or speech impaired)

**Customer Service Centre:**  
**Narre Warren:** Bunjil Place, Patrick Northeast Drive  
**Cranbourne:** Cranbourne Park Shopping Centre  
**ABN:** 43 320 295 742



**TIS:** 131450 المترجم الفوري 翻译 مترجم شفاهى ਦੁਬਾਰੀਆ ၈၈၈၈ ၈၈၈၈၈၈



***Is the proposed timeframe for engagement with a possible carrier, that is, at least 12 months before the first units or homes in the development are due to be occupied, reasonable in your view? If not, please suggest an alternative timeframe and please provide any reasons for your recommendation.***

Council believes that a reasonable timeframe for engagement with a possible carrier should commence at least two years before the first homes are due to be occupied, or as soon as the developer obtains the land. However, this would be best validated with telecommunication providers.

Thank you for taking the time to consider our submission. The City of Casey supports any changes or improvements to policy that will result in greater connectivity for our rapidly growing community. If you would like to discuss our submission in more detail, please do not hesitate to contact us.

Kind regards,



**Marion Greig**  
Manager Strategy Innovation and Transformation  
City of Casey

**Web:** casey.vic.gov.au  
**Email:** caseycc@casey.vic.gov.au  
**Phone:** 03 9705 5200  
**Post:** PO Box 1000, Narre Warren VIC 3805  
**NRS:** 133 677 (for the deaf, hearing or speech impaired)

**Customer Service Centre:**  
**Narre Warren:** Bunjil Place, Patrick Northeast Drive  
**Cranbourne:** Cranbourne Park Shopping Centre  
**ABN:** 43 320 295 742



**TIS:** 131450 المترجم الفوري 翻译 مترجم شفاهى ਦੁਬਾਰੀਆ ಐಐಐ ಪರಿವಹಣ

