



79 Constitution Avenue
Canberra ACT 2612
t (02) 6245 1300
f (02) 6257 5658
hia.com.au

17 January 2020

Australian Government
Department of Communications and the Arts
new.developments@communications.gov.au

Dear Person

Review of the 2015 Telecommunications in New Developments (TIND) policy

The following comments are provided by the Housing Industry Association in regards to the *Review of the 2015 Telecommunications in new Development policy (the TIND policy)*. HIA is committed to working with all sectors of government to support a regulatory environment that facilitates efficient provision of infrastructure that facilitates growth in the economy, reduces red tape, and enables the delivery of affordable housing.

About the Housing Industry Association (HIA)

The HIA is Australia's only national industry association representing the interests of the residential building industry, including new home builders, renovators, trade contractors, land developers, related building professionals, and suppliers and manufacturers of building products.

As the voice of the residential building industry, HIA represents a membership of 60,000 across Australia. HIA members are involved in land development, detached home building, home renovations, low & medium-density housing, high-rise apartment buildings and building product manufacturing.

HIA members comprise a diversity of mix of companies residential builders, including the Housing 100 volume builders, small to medium builders and renovators, residential developers, trade contractors, major building product manufacturers and suppliers and consultants to the industry. HIA members construct over 85 per cent of the nation's new building stock.

HIA response to the TIND policy review

HIA welcomes the TIND policy review. It is agreed such a review is timely given the TIND policy is approaching its fifth anniversary and changes to the delivery of telecommunications infrastructure have taken place during this time.

- Section 3. Reasons for review

With regard to completion of the NBN HIA agree matters such as these do need to be reflected in a revised version of the policy. It is crucial for industry that the revised policy acknowledges and reflects any changes that have occurred since the policy was initially developed and have become accepted industry practice, also that reasonable forecasting of any changes to industry practice be identified to eliminate to the greatest extent possible any delays to the efficient provision of telecommunications infrastructure in the future.

The obligation of statutory infrastructure providers to provide the details of their service areas so they can be accurately mapped by ACMA is important to industry. Access to such information must be transparent and provided in a timely manner to better allow for informed decision making by developers and builders.

- Section 4. Ongoing approach

Under Developer responsibilities it is discussed that ... *there should be scope for developers and carriers to come up with innovative and more efficient delivery options, providing they meet the needs of consumers and are transparent to them.*

HIA supports innovation particularly in cases where it can be reasonably assured innovation will deliver positive impacts to housing supply and affordability. It would assist industry if the revised policy took a lead role with regard to innovation and provided examples where this has already occurred or if examples do not yet exist outline development / building scenarios where it may be appropriate to seriously entertain innovative approaches.

- Section 5. Key issues

Regarding Developer compliance, this provides an excellent opportunity to explore why there are some developers that do not follow the policy. It is considered that non-compliance is not intentional rather in many instances it would depend on the scale of development and the resources and skills of the project team to navigate the process.

HIA acknowledges the planning measures that have been implemented in some jurisdictions and consider in some instances these do have procedural benefits, however on balance consideration must be given to ensuring over-regulation and unnecessary or undesirable red-tape does not creep in to this regulatory space and in the first instance there is adequate awareness, training and information being distributed to assist the broad range of developers / builders that are required to participate in the process of providing telecommunications infrastructure. HIA is willing to assist in this regard and discuss with the Department any opportunities they consider may be suitable to reach the residential construction industry, such as for example distribution of a notice(s) via HIA Regional e-news.

Thank you for the opportunity to provide comment at this stage, HIA would appreciate being consulted with regard to any further TIND policy review matters and any other matters relating to TIND or the NBN rollout that may impact the residential construction industry.

Yours sincerely
HOUSING INDUSTRY ASSOCIATION LIMITED



Mike Hermon
Executive Director – Planning and Development