

22 July 2019

Telecommunications Infrastructure
Department of Planning, Lands and Heritage
Locked Bag 2506
PERTH WA 6001

Via email: Infrastructure@planning.wa.gov.au

Dear Sir/Madam

Draft Position Statement on Fibre Ready Telecommunications Infrastructure

Thank you for the opportunity to provide feedback in relation to the above Draft Position Statement on Fibre Ready Telecommunications Infrastructure. The Urban Development Institute of Australia (UDIA) WA is the peak body representing the property development industry in Western Australia. UDIA is a membership-based organisation with members drawn from the residential, commercial and industrial property development sectors. UDIA members include both private and public sector organisations. Our industry represents approximately 12.7% of Western Australia's Gross State Product, contributing \$31.7 billion annually to the Western Australian economy and \$264.98 billion nationally. As well as helping to create sustainable and liveable communities, the industry employs a total of 215,100 Western Australians and 2.044 million Australians across the country.

UDIA recognises the importance of providing access to quality telecommunications infrastructure to support our economy and evolving community needs. Whilst the Institute supports the intent of the draft position statement, we require further clarity regarding the implementation of the draft position statement's policy measures in order to ensure that these measures are applied consistently and efficiently.

Section 4: Policy objectives

The position paper sets out different requirements for 'greenfield subdivision' and 'infill subdivision' proposals however, definitions are not provided for these different development scenarios. Greater clarity is needed to determine which policy requirements will be applied, particularly where infill subdivision creates multiple lots.

Section 5: Policy Measures

The policy measures recommend that conditions be attached to subdivision approvals requiring “*arrangements be made to the satisfaction of the local government and to the specification of a suitably qualified person for the provision of fibre ready facilities*”. Whilst understanding the intent of the proposed conditions, the process for ‘clearing’ these proposed conditions is unclear. Firstly, it is unclear what appropriate ‘*arrangements be made*’ means in practice. Furthermore, as these are required to be made to the satisfaction of the relevant local government, without detailed guidance there is likely to be significant divergence in the individual practices operated by local governments resulting in the inconsistent application of the policy measures.

It is also unclear whether the ‘suitably qualified person’ is, or can be appointed by the development proponent, local government or a telecommunications agency. Whilst clarity is needed, the Institute would not support telecommunications agencies becoming de-facto clearing agencies.

Whilst it is important that appropriate evidence for the provision of telecommunications infrastructure is provided, to avoid unnecessary delay in the development approval process, this process should not be overly complicated or burdensome. To ensure that the process for clearing conditions is efficient and remains consistent, UDIA strongly recommends that appropriate evidence of a contract and/or details of another appropriate commitment for the provision of communications infrastructure be provided to the relevant planning authority.

Should any assistance or further information be required regarding this matter, UDIA would be delighted to assist. Should any further information be required in relation to the comments above, please contact Chris Green, Director Policy and Research at policy@udiawa.com.au or 08 9215 3400.

Yours sincerely



Tanya Steinbeck
Chief Executive Officer