Australian Telecommunications Alliance

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AUSTRALIAN TELECOMMUNICATIONS ALLIANCE SUBMISSION

To: The Standing Committee on Government Administration A

Re: Inquiry into AI Data Centres

21 September 2026



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1. AUSTRALIAN TELECOMMUNICATIONS ALLIANCE

The Australian Telecommunications Alliance (ATA) is the peak body of the Australian telecommunications industry. We are the trusted voice at the intersection of industry, government, regulators, and consumers. Through collaboration and leadership, we shape initiatives that grow the Australian telecommunications industry, enhance connectivity for all Australians, and foster the highest standards of business behaviour.

The ATA and its members have a direct interest in the inquiry because AI and data centre facilities depend upon high-capacity, resilient fixed, mobile, fibre, satellite, and international telecommunications networks, as well as timely access to land and infrastructure corridors for their deployment.

Accordingly, this submission focuses on the telecommunications, connectivity, deployment, resilience, and regulatory coordination issues raised by the inquiry, while supporting appropriate expert assessment of energy, water, environmental, and land use impacts.

For questions on this submission, please contact Victoria Robertson, Head of Government Relations and Policy, v.robertson@austelco.org.au. For more details about the ATA, visit www.austelco.org.au.

2. EXECUTIVE SUMMARY

The Australian Telecommunications Alliance (ATA) welcomes the opportunity to contribute to the Tasmanian Parliament's inquiry into the construction and operation of AI data centres.

AI and data centres can support Tasmania's economic growth, digital capability, and infrastructure resilience. Realising those benefits, however, requires a planning framework that protects public resources, supports informed community participation, and ensures developments deliver tangible and enduring benefits for Tasmania.

The inquiry appropriately examines energy, water, land use, environmental impacts and community outcomes. However, it does not expressly consider the telecommunications infrastructure required to construct, connect and operate these facilities. This is a significant gap.

The ATA's central recommendation is that **telecommunications connectivity and resilience be explicitly incorporated into Tasmania's assessment framework for major AI and data centre developments**.

Data centres are not standalone developments. They depend on an interconnected ecosystem of telecommunications networks, fibre routes, cloud and compute infrastructure, international connectivity, energy systems and supply chains.

A data centre may have access to land, water and electricity, but it cannot operate reliably without high-capacity connectivity, physically diverse fibre routes, and resilient domestic and international network connections. Telecommunications requirements should therefore be assessed from the outset, including network capacity, route diversity, restoration arrangements, future growth requirements and the approvals required to deliver associated infrastructure.

The framework should also recognise that enabling infrastructure can be constrained and may take years to plan, approve and deliver. Long-term planning should consider cumulative demand, infrastructure lead times and the capacity required to support future digital and economic development, not just the needs of individual projects.

The ATA supports a framework in which proponents meet the reasonable and directly attributable costs of the infrastructure their projects require. Project-specific costs should not be transferred to telecommunications carriers, existing customers or the wider community. Equally, proponents should not be expected to fund infrastructure unrelated to their development.

Tasmania should also avoid creating obligations that duplicate or conflict with emerging national standards, Commonwealth telecommunications law, critical-infrastructure regulation, or existing privacy, cyber-security and

environmental frameworks. State arrangements should complement national policy while addressing legitimate Tasmanian planning, resource and community considerations.

The ATA recommends that Tasmania:

- Recognise telecommunications connectivity, deployment, and resilience as essential AI infrastructure;
- Require an Integrated Infrastructure and Connectivity Plan for major developments;
- Adopt a coordinated, risk-based assessment pathway that considers cumulative and lifecycle impacts;
- Allocate project-specific infrastructure costs fairly and transparently;
- Require meaningful disclosure, consultation, and measurable community benefits; and
- Align the Tasmanian framework with national approaches while protecting sensitive information, competition, and future infrastructure capacity.

In short, **responsible data centre policy requires the facility and its enabling infrastructure to be assessed together.** Connectivity should be treated as a core planning input, rather than a downstream operational issue.

3. AI DATA CENTRES ARE PART OF AN INTEGRATED TASMANIAN INFRASTRUCTURE ECOSYSTEM

The inquiry's Terms of Reference appropriately recognise that AI data centres have implications for electricity, water, land, the environment, and local communities. The ATA considers telecommunications connectivity to be a core infrastructure input that should be expressly recognised alongside energy, water, and land use. Telecommunications is not an ancillary service arranged after a data centre has been approved. It is an essential infrastructure input that affects site suitability, resilience, construction requirements, and the capacity of a facility to deliver wider benefits.

The viability and value of data-centre development in Tasmania will depend not only on access to land, energy, and water, but also on high-capacity and resilient telecommunications infrastructure. Telecommunications networks connect data centres with cloud platforms, edge-computing facilities, AI-enabled devices, end users and domestic and international services.

3.1 UNDERSTANDING THE INFRASTRUCTURE ECOSYSTEM SUPPORTING AI DATA CENTRES

3.1.1 Australia's AI infrastructure should be understood as a connected technology stack. Compute, cloud, AI models, devices, telecommunications networks, and supporting energy infrastructure, are interdependent. Limitations in one layer can constrain the performance, availability, and reach of the entire system.

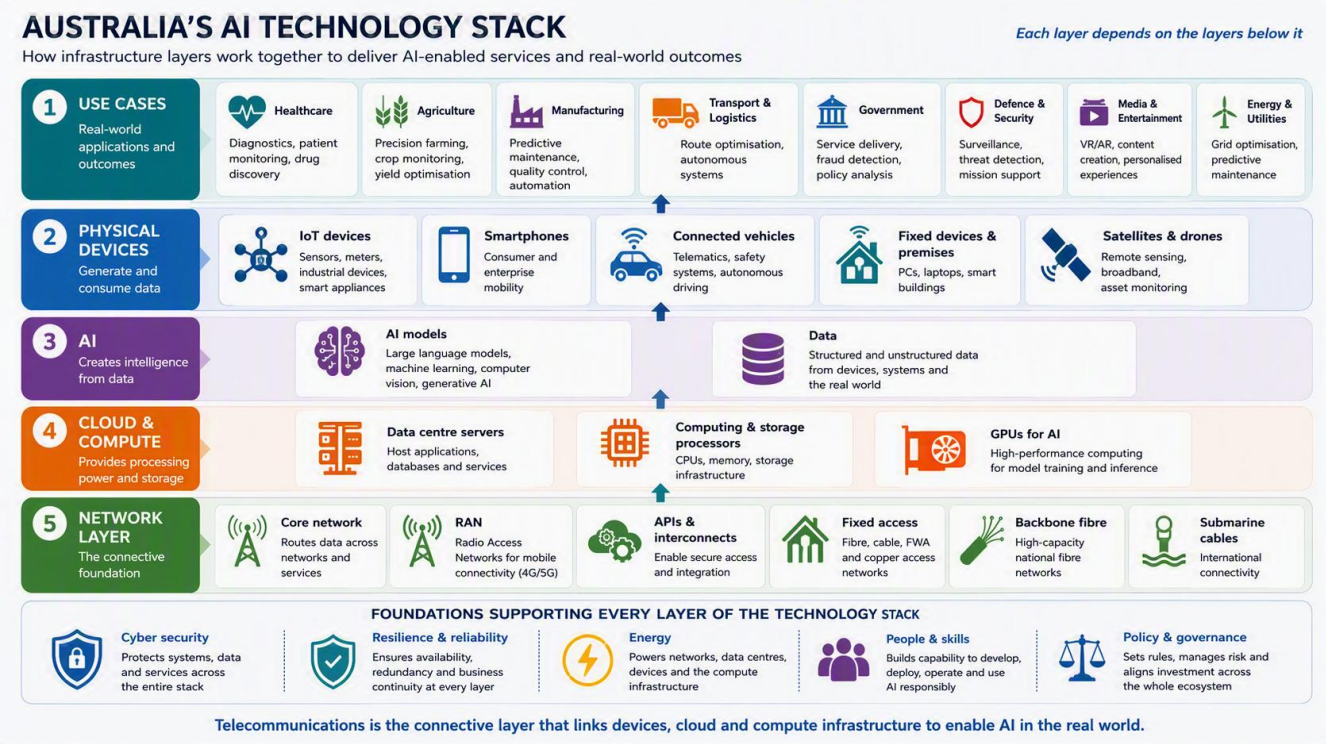


Figure 1: The infrastructure layers supporting AI capability. These same interdependencies apply to the planning and operation of major data facilities in Tasmania.

Key Takeaway:

- Data centres provide compute capability. Telecommunications networks connect that capability to users, businesses, governments, and communities.
- Both must be planned as part of an integrated infrastructure system.

3.1.2 AI infrastructure depends on a broader set of enabling systems including energy, cyber security, resilience, skills, and governance.

3.1.3 Telecommunications connectivity determines whether compute capability can be accessed beyond the facility boundary. It also affects the operational resilience of the facility and the availability of the services that depend on it. For that reason, telecommunications should be treated as an essential infrastructure input during site selection, assessment, and approval, rather than as a service arranged after the principal development has been approved.

3.2 CONNECTIVITY IS A SITE-SELECTION AND PLANNING CONSIDERATION

3.2.1 Just as proponents assess energy, water, and land requirements, they should assess telecommunications capacity and resilience before a site is approved or government support is committed. The presence of a fibre route near a proposed site does not, by itself, demonstrate that the site has sufficient capacity, route diversity or resilience to support a major facility.

3.2.2 Depending on scale and operational requirements, an assessment may need to consider:

- available network capacity;
- physically and geographically diverse fibre routes;

- diverse entry points into the facility;
- inter-capital and international connectivity;
- mobile, wireless, or satellite backup capability;
- restoration and disaster-recovery arrangements;
- land-access and approval requirements for new routes;
- energy dependencies of supporting telecommunications infrastructure;
- the scope for future capacity augmentation; and
- cumulative demand from other proposed facilities.

3.2.3 Early consideration of these matters can identify unsuitable locations, reduce the risk of later delays and allow telecommunications, electricity, water and transport requirements to be planned in a coordinated way. Early assessment should also consider infrastructure lead times and whether the proposed development would materially constrain the capacity or route options available for future projects. These strategic-capacity issues are discussed further in section 4.4.

3.3 FIBRE ROUTES ARE CRITICAL AI INFRASTRUCTURE

3.3.1 High-capacity fibre is a critical input to the operation of major data centres. It connects facilities to telecommunications networks, cloud and interconnection services, domestic users, and, where required, international capacity.

3.3.2 The existence of a fibre route near a proposed facility is not sufficient evidence of resilience. Nominally separate services may share the same conduit, bridge crossing, exchange, power dependency, or other point of failure. Planning should therefore consider physical route diversity, available capacity, site-entry diversity, restoration arrangements, and the approvals required for any new infrastructure.

3.3.3 These requirements should be identified in the proposed Integrated Infrastructure and Connectivity Plan discussed in section 5.2.

4. PROTECTING RESOURCES AND THE ENVIRONMENT

Relevant Terms of Reference:

- ToR 1: Public resources and environment
- ToR 2: Planning system
- ToR 4: Disclosure
- ToR 7: Incidental matters

4.1 SUPPORT RESPONSIBLE AND PROPORTIONATE DEVELOPMENT

4.1.1 The ATA supports a planning and regulatory framework that requires major data-centre developments to identify and manage their impacts on public resources, shared infrastructure, the environment, and surrounding communities.

4.1.2 The framework should be proportionate to the scale and risk of the development. A small enterprise facility,

an expansion within an established industrial site and a major AI data-centre campus should not automatically be subject to identical assessment, reporting, and oversight requirements.

4.1.3 Requirements should be based on the development's reasonably foreseeable impacts and expressed as outcomes wherever possible. This will allow proponents to adopt new technologies and operating practices that improve energy, water, land, and infrastructure efficiency without requiring continual prescriptive regulatory amendment.

4.1.4 Proportionality should be reflected in clear thresholds based on matters such as resource demand, physical footprint, associated infrastructure, location-specific constraints, and potential cumulative impacts. Enhanced assessment should be directed to developments capable of creating material system or community impacts, rather than applying identical obligations to all facilities described as data centres.

4.2 FAIR ALLOCATION OF INFRASTRUCTURE COSTS

4.2.1 The ATA supports the principle that the project should pay for its own connection costs. Those costs should not be counted as a community benefit. Community benefits arise only where infrastructure delivers an additional outcome beyond the needs of the project itself.

4.2.2 For telecommunications, such costs might include dedicated fibre extensions, diverse site entries, project-specific civil works, or network augmentation required primarily to service the development. Responsibility for connection and augmentation costs should ordinarily be determined through commercial arrangements between the proponent and the relevant provider, subject to any generally applicable regulatory requirements.

4.2.3 The framework should also establish a clear boundary between project-specific costs and broader infrastructure investment. As a matter of regulatory cost attribution, proponents should be responsible for infrastructure reasonably required to connect and operate their development, but should not be required to fund unrelated network upgrades. Equally, telecommunications providers and existing customers should not be expected to absorb costs that are properly attributable to a data centre project. This should not prevent proponents from voluntarily supporting broader infrastructure investment or entering into community-benefit arrangements where these are transparently identified and separately assessed.

4.2.4 Infrastructure required to connect and operate a facility should generally be treated as a project cost, rather than a community benefit. A community benefit should represent an additional outcome beyond the project's operational requirements. For telecommunications infrastructure, this may include improved network resilience, greater route diversity, expanded service availability, enhanced restoration capability, or other benefits that extend beyond the facility itself, and provides value to the broader community.

4.3 WHOLE-OF-CORRIDOR PLANNING

4.3.1 Where new telecommunications, electricity, water, or transport infrastructure is required, planning should consider whether routes or corridors can be coordinated. Early coordination can reduce repeated disturbance, identify environmental and heritage constraints, and avoid multiple sequential approval processes.

4.3.2 Coordination should not be interpreted as requiring shared infrastructure where this would impair competition, security, or operational resilience. Separate and geographically diverse fibre paths, for example, may be necessary to avoid common points of failure.

4.3.3 Corridor coordination should include early identification of land tenure, environmental, heritage, road-opening, and access requirements. It should facilitate coordinated assessment where appropriate, without presuming that energy, water, and telecommunications infrastructure can or should share the same physical alignment. The objective should be coordinated assessment and sequencing, not mandatory co-location.

4.4 CUMULATIVE CONSTRAINTS AND STRATEGIC CAPACITY SHOULD BE ASSESSED AT SYSTEM LEVEL

4.4.1 Individual developments may appear manageable when assessed separately but create material cumulative pressures when concentrated within the same region or dependent on the same infrastructure corridors. Tasmania's framework should therefore provide for periodic assessment of aggregate demand on energy, water, telecommunications capacity, land, and infrastructure corridors.

4.4.2 Major AI and data centre proposals should not be assessed solely as individual planning applications. They should be considered in the context of Tasmania's long-term strategic infrastructure capacity. This is particularly important where multiple projects may compete for the same infrastructure capacity, or where decisions have implications for Tasmania's future ability to attract and support strategic digital investment. High-capacity fibre routes, diverse inter-capital and international connectivity, suitable infrastructure corridors, data centre-ready locations, specialist workforce capability, and supporting energy infrastructure may be constrained, location specific, or take time to develop.

4.4.3 Tasmania's framework should recognise the lead times associated with enabling infrastructure, and the importance of maintaining sufficient capacity and development options to support the State's longer-term economic and digital objectives. Decisions about one project should not inadvertently exhaust constrained capacity, foreclose more resilient infrastructure options, or limit the ability to accommodate future investment.

4.4.4 Strategic-capacity assessment should inform infrastructure planning and project sequencing without creating a presumption against development. Its purpose should be to identify constraints early, support timely investment, and ensure individual approvals are consistent with Tasmania's longer-term infrastructure requirements.

4.4.5 For telecommunications, cumulative assessment should consider whether multiple facilities depend on the same fibre routes, exchanges, cable pathways, power supplies, or restoration resources. Aggregate reporting should support forward infrastructure planning while protecting project-specific commercial and security-sensitive information.

4.4.6 The Tasmanian Government, informed by relevant infrastructure providers, regulators, and planning authorities, should periodically assess cumulative demand and strategic capacity at regional and statewide levels. Where material cumulative constraints or long infrastructure lead times are identified, the assessment should inform project sequencing, infrastructure investment, corridor protection, approval conditions, and future land-use planning.

5. A FIT-FOR-PURPOSE PLANNING AND APPROVALS FRAMEWORK

Relevant Terms of Reference:

- ToR 2: Resource management and planning system
- ToR 5: Consultation
- ToR 7: Incidental matters

5.1 A TAILORED ASSESSMENT PATHWAY

5.1.1 The ATA supports clearer planning guidance for major AI and data-centre facilities. The objective should be to improve the Tasmanian Resource Management and Planning System's capacity to assess these developments, rather than to create an entirely separate approval system.

5.1.2 The ATA considers that an enhanced pathway for major facilities should include, at a minimum:

- a clear definition of the facilities covered;
- thresholds distinguishing major developments from lower-impact facilities;
- published assessment criteria;
- early referral to relevant utilities and infrastructure providers;
- concurrent assessment of interdependent infrastructure;
- clear statutory decision timeframes;
- a mechanism for assessing cumulative impacts;
- appropriate review and enforcement arrangements;
- a single lead coordination point for proponents and infrastructure providers; and
- clear arrangements for material project changes after approval.

5.1.3 This information would allow decision-makers to distinguish between infrastructure that is presently available, infrastructure that can be delivered within the project timetable, and infrastructure that remains dependent on future investment, approvals, or third-party commitments. It would also assist the State to identify where multiple proposed developments are competing for, or relying on, the same enabling capacity.

5.1.4 The lead coordination point should facilitate referrals, information sharing and sequencing but should not displace the statutory responsibilities of relevant decision-makers.

5.1.5 Clear timeframes should include appropriate mechanisms for requesting necessary information and pausing assessment where a proponent has not supplied it. Timeframes should apply to both initial decisions and referrals to relevant infrastructure and regulatory bodies.

5.2 AN INTEGRATED INFRASTRUCTURE AND CONNECTIVITY PLAN

5.2.1 Major developments should not be approved unless proponents have demonstrated how essential enabling infrastructure will be delivered. The Tasmanian framework could require major proponents to prepare an **Integrated Infrastructure and Connectivity Plan** as part of the planning process. The Plan should identify the facility's expected infrastructure requirements and explain how they will be funded, approved, delivered, and maintained.

5.2.2 It is key that the Plan accompanies the initial application rather than is deferred as a post-approval condition. Deferral would risk approval of a facility before the practicability, cost, route, timing, and environmental implications of the supporting infrastructure are understood.

5.2.3 The telecommunications component should identify:

- the capacity and performance required during construction and operation;
- existing and proposed fibre routes and site entries;
- physical route diversity, including where resilience requires routes outside existing conduits or infrastructure corridors, and material common points of failure;
- domestic interconnection, inter-capital and international-capacity dependencies, including any material concentration or continuity risks;

- land-access, planning, environmental, and heritage approvals;
- restoration and disaster-recovery arrangements;
- energy dependencies of supporting telecommunications facilities;
- evidence of early engagement with relevant infrastructure providers;
- future augmentation requirements; and
- responsibility for funding and delivery.

5.2.4 Requiring this information at the outset would help ensure that approvals are based on a realistic understanding of the total infrastructure required by the development.

5.2.5 The publicly available version of the Plan should describe infrastructure requirements and assurance outcomes at a high level. Detailed route, capacity, and vulnerability information should be provided only to authorised decision-makers where required.

5.2.6 Where delivery of essential supporting infrastructure is not sufficiently certain at the time of assessment, any approval should identify appropriate staging, verification, or pre-operation requirements. This would avoid a facility commencing operation before necessary connectivity and resilience arrangements are in place.

5.3 ASSOCIATED TELECOMMUNICATIONS INFRASTRUCTURE

5.3.1 A data-centre approval does not itself authorise the fibre routes, network facilities, or civil works required to connect the site. If those elements are considered only after the principal facility has been approved, separate land, planning, environmental, and heritage processes may delay construction or result in less efficient routes.

5.3.2 The ATA's previous work has identified that long-distance fibre projects may involve multiple land-access, planning, environmental, heritage, and certification processes across different land tenures and decision-makers. The lesson for Tasmania is not that these safeguards should be removed, but that the data-centre facility and its supporting telecommunications infrastructure should be planned together, with duplication reduced and interdependent decisions sequenced coherently. Resilient connectivity may also require physically separate fibre routes rather than additional capacity within an existing conduit or common infrastructure corridor.

Why deployment reform matters

Telecommunications deployment is increasingly an AI policy issue.

Recent long-haul fibre deployments have been subject to:

- **3,000+** land access notices
- **1,100+** construction certificates
- **18 months** project delays

Telecommunications deployment delays can become AI deployment delays.

5.3.3 Tasmania should therefore enable early and coordinated consideration of associated telecommunications infrastructure. Tasmanian processes should be designed with explicit regard to the operation of the Commonwealth telecommunications framework. Where an activity is regulated under Commonwealth law, Tasmania should avoid duplicative information requirements or approval conditions addressing the same matter, subject to the lawful operation of state environmental, heritage, and land-use protections.

5.3.4 The Tasmanian Planning Scheme currently exempts specified minor communications infrastructure,

including acknowledging facilities falling within the Commonwealth low-impact framework. Where underground fibre falls outside those provisions, Tasmania should adopt a proportionate planning pathway that enables low-impact telecommunications infrastructure to be delivered efficiently while retaining targeted assessment for genuinely sensitive environmental, heritage, and land use issues.

5.3.5 As demand for AI and data centre infrastructure grows, new inter-city and regional fibre routes will become increasingly important. The planning system should support the delivery of resilient and physically diverse connectivity, and preserve future telecommunications corridors needed for Tasmania's long-term digital and economic development. The ATA's recommended amendments to the Tasmanian Planning Scheme are set out in the Appendix.

5.4 MATERIAL CHANGES AND DECOMMISSIONING

5.4.1 Data-centre impacts may change materially over the life of a facility as capacity increases, equipment is replaced, cooling arrangements change, or the nature of the workload evolves. Tasmania's framework should identify which changes require notification, reassessment or variation of approval conditions.

5.4.2 Major proponents should identify arrangements for decommissioning facility-owned equipment, managing hazardous or electronic waste and rehabilitating the site. The framework should also address coordination with owners of supporting infrastructure, recognising that telecommunications assets may continue to serve other customers, retain operational or resilience value, or be subject to separate ownership and regulatory arrangements.

6. TRANSPARENCY, OVERSIGHT, AND ACCOUNTABILITY

Relevant Terms of Reference:

- ToR 3: Parliamentary oversight and accountability
- ToR 4: Public disclosure

The ATA supports a transparency framework that is **meaningful, comparable, and proportionate**. Information disclosed to communities, Parliament, and regulators should provide a clear understanding of the impacts and performance of major developments, support informed decision-making, and avoid unnecessary duplication. Reporting frameworks should enable meaningful comparison between projects, while ensuring disclosure obligations remain proportionate to the scale, risk, and significance of the development.

6.1 PARLIAMENTARY OVERSIGHT SHOULD FOCUS ON THE FRAMEWORK

6.1.1 The ATA supports effective parliamentary oversight of the policy and regulatory framework governing major data-centre development. Parliament should have access to sufficient information to scrutinise the allocation of public resources, any public financial support, cumulative infrastructure impacts, compliance performance, and delivery of community commitments.

6.1.2 Enhanced parliamentary reporting should be directed to matters of strategic public significance, such as material public financial support, preferential access to constrained public resources, significant statewide infrastructure commitments, or cumulative system impacts.

6.1.3 Reporting should focus on aggregate resource commitments, government support, compliance trends and

delivery of publicly stated benefits, rather than operationally sensitive details of individual networks or facilities.

6.1.4 Reporting should also identify material non-compliance or departures from approved resource limits and publicly stated benefit commitments, together with the action taken by the responsible authority.

6.1.5 Parliamentary oversight should not, however, duplicate statutory planning processes or require Parliament to become an additional technical approval body for individual developments. Detailed planning, environmental, and infrastructure assessments should remain with appropriately qualified decision-makers operating under legislation, published criteria, and reviewable processes.

6.2 STANDARDISED AND MEANINGFUL RESOURCE DISCLOSURE

6.2.1 The ATA supports public reporting of material resource consumption by major facilities. Consistent with the principles outlined above, reporting should be meaningful, comparable, and proportionate. Information should help communities and decision-makers understand resource use and performance without creating unnecessary reporting complexity or duplication.

6.2.2 The framework should distinguish between:

- proposed or approved maximum capacity;
- actual annual consumption;
- peak demand;
- water withdrawal and water consumption;
- recycled or alternative water sources;
- relevant efficiency measures;
- performance against approved resource limits, other approval conditions, and public commitments;
- the reporting period; and
- whether figures are facility specific or estimated.

6.2.3 Reporting only a facility's maximum theoretical capacity could create a misleading picture of its actual impact. Conversely, reporting only average annual consumption may not reveal peak pressure on shared infrastructure. Standard definitions will therefore be important.

6.3 REPORT ONCE, USE MANY TIMES

6.3.1 Where substantially equivalent information has already been provided to an authorised planning body, utility, environmental regulator, or Commonwealth regulator, that information should be capable of satisfying the Tasmanian requirement. A "report once, use many times" approach would improve consistency, reduce duplication, and allow regulators to focus on substantive risks.

6.3.2 Equivalent reporting should be recognised where the information is materially the same, sufficiently current, and available to the responsible Tasmanian authority. Any additional Tasmanian requirement should address an identified information gap rather than reproduce an existing return in a different format.

6.3.3 This principle should not prevent Tasmania seeking additional information where an existing report does not address a legitimate Tasmanian planning, resource, or community-impact question.

6.4 PROTECTING SENSITIVE INFORMATION

6.4.1 Transparency requirements must distinguish between information necessary for public accountability and details that could expose security vulnerabilities or prejudice competition.

6.4.2 Public reporting should not require disclosure of detailed fibre routes, network diagrams, facility entry points, capacity reserved for particular customers, cyber-security configurations, system vulnerabilities, or customer information. High-level information about network diversity and resilience may be published, while sensitive supporting material should be provided confidentially to authorised decision-makers where necessary.

6.4.3 The framework should distinguish between:

- information suitable for public reporting;
- information available to Parliament or regulators subject to confidentiality protections; and
- highly sensitive technical information disclosed only where necessary to an authorised decision-maker.

6.4.4 Confidentiality protections should be specific and justified and should not prevent publication of meaningful aggregate information about resource use, compliance and community-benefit delivery.

7. COMMUNITY CONSULTATION AND TANGIBLE TASMANIAN BENEFITS

Relevant Terms of Reference:

- ToR 5: Community consultation
- ToR 6: Tangible benefits

7.1 CONSULTATION SHOULD BE EARLY, ACCESSIBLE, AND ONGOING

7.1.1 The ATA supports early, accessible, and continuing community consultation for major developments. Consultation should commence before key project decisions become fixed and continue through construction and operation.

7.1.2 Community engagement should be proportionate to the scale and impacts of the project, focus on matters within the responsibility of the proponent, and be accessible to affected communities. Proponents should explain how feedback will be considered, and whether project design, mitigation measures, or operational arrangements have changed in response.

7.1.3 Communities should receive clear information about expected resource use, construction impacts, infrastructure requirements, environmental mitigation measures, employment opportunities, complaint mechanisms, and proposed community benefits. During operation, engagement should focus on resource performance, compliance, material changes to the facility, and delivery of benefit commitments.

7.2 BENEFITS MUST BE ADDITIONAL AND MEASURABLE

7.2.1 The inquiry provides an opportunity to distinguish between:

- **Baseline project obligations** – infrastructure and expenditure necessary to construct and operate the facility;
- **Mitigation measures** – actions required to address project impacts; and
- **Additional community benefits** – outcomes that extend beyond the project's operational requirements.

7.2.2 This distinction is important because tangible community benefit should be additional to both the infrastructure required to operate the project, and the measures necessary to manage its impacts.

7.2.3 For telecommunications infrastructure, this means a dedicated fibre connection or network augmentation required solely to service a facility should generally be treated as a project cost, not a community benefit. Telecommunications investment should only be considered a community benefit where it delivers an additional outcome beyond the facility boundary, such as improved network capacity, resilience, route diversity, or access to digital services for other users or communities.

7.3 TASMANIA SHOULD PARTICIPATE, NOT MERELY HOST

7.3.1 The presence of a major AI or data-centre facility does not, by itself, guarantee enduring benefits for Tasmania. While construction activity may be significant, ongoing benefits can vary depending on the nature of the project.

7.3.2 Where projects receive public support, concessional arrangements, or preferential access to public resources, proponents should clearly identify the broader benefits they will deliver to Tasmania. These benefits may include:

- telecommunications resilience and digital capability;
- local procurement and supplier development;
- workforce training and technical skills
- partnerships with education and research institutions;
- infrastructure investment;
- support for regional businesses and industries; and
- improved communication and emergency resilience.

7.3.3 The appropriate benefit will vary by project and location. The key requirement is that benefits are clearly identified, measurable, and relevant to the scale of support or access provided.

7.3.4 Major projects receiving material public support should prepae a **Tasmanian Community and Connectivity Benefit Plan** that identifies:

- the commitment being made
- Whether it is a project obligation, mitigation measure, or additional community benefit;
- the intended beneficiaries;
- The responsible party;
- Funding and delivery arrangements;
- duration of the commitment
- Performance measures and reporting requirements; and
- consequences if the commitments are not delivered.

7.4 COMMUNITY BENEFITS SHOULD PRESERVE COMPETITION

7.4.1 Community-benefit arrangements should not require a proponent to use a preferred telecommunications supplier, or provide exclusive access to publicly supported infrastructure. Procurement and infrastructure arrangements should be proportionate, competitively neutral, and developed in consultation with affected infrastructure providers.

7.4.2 Where public funding contributes to telecommunications infrastructure, government should consider whether access, procurement, sharing, or other arrangements are needed to ensure that the public contribution produces an identifiable public benefit. Any such arrangements should be proportionate, competitively neutral, and developed in consultation with affected infrastructure providers.

8. RESILIENT DATA CENTRES REQUIRE RESILIENT SUPPORTING INFRASTRUCTURE

Relevant Terms of Reference:

- ToR 1: Protecting public resources
- ToR 2: Specific planning impacts
- ToR 3: Accountability
- ToR 7: Incidental matters

8.1 RESILIENCE EXTENDS BEYOND THE FACILITY BOUNDARY

8.1.1 Data-centre resilience should not be assessed solely by examining equipment and backup systems within the facility boundary. Service availability also depends on external electricity infrastructure, terrestrial fibre routes, interconnection facilities, telecommunications exchanges, international connectivity, and the ability to repair and restore services following a disruption.

8.1.2 Major developments should therefore assess material common points of failure, including whether nominally separate telecommunications services use the same route, conduit, bridge crossing, exchange, or power dependency.

8.1.3 This assessment should be proportionate and security-sensitive. Detailed route and vulnerability information should be available to authorised decision-makers where required, but should not ordinarily be placed on a public register

Resilience extends beyond the facility boundary

A resilient data centre depends on:

- Diverse telecommunications routes
- Reliable energy
- Secure supply chains
- Restoration capability, and
- Trusted domestic and international connectivity.

8.2 CONNECTIVITY DIVERSITY MUST BE PHYSICAL AS WELL AS CONTRACTUAL

8.2.1 Resilience is not demonstrated simply because a facility purchases services from more than one provider. Services supplied by different carriers may use the same conduit, bridge crossing, exchange, cable landing point, power supply, or other infrastructure. A resilience assessment should therefore identify material physical common points of failure, while protecting detailed route information from public disclosure.

8.3 EXTERNAL DEPENDENCIES SHOULD BE CONSIDERED

8.3.1 Major facilities may depend on inter-capital telecommunications routes, subsea cable systems, international cloud services, equipment supply chains, and restoration resources located outside Tasmania. The planning framework should require proponents to identify material external dependencies and demonstrate proportionate continuity, diversity, and recovery arrangements.

8.3.2 These dependencies also have implications for digital sovereignty. In this context, digital sovereignty should not be understood as requiring domestic ownership of all infrastructure, the domestic location of every service, or national self-sufficiency. Rather, it concerns Australia's practical ability to maintain access to secure, resilient, and trusted digital services, including during disruption or geopolitical, supply chain, or infrastructure shocks.

8.3.3 Sovereignty considerations should be assessed as part of broader resilience, security, and infrastructure-dependency assessments. Relevant considerations may include the diversity of domestic and international connectivity, concentration in particular routes or suppliers, access to restoration capability, the substitutability of critical services, and the capacity to maintain or recover essential functions.

8.3.4 The purpose of this assessment should be to understand material dependencies and improve resilience, not to prescribe ownership models, mandate particular suppliers, or unnecessarily restrict participation by trusted international providers.

8.4 SHARED INFRASTRUCTURE REQUIRES COORDINATED PLANNING

8.4.1 Data centres, telecommunications networks and energy infrastructure are interdependent. Planning should consider not only the electricity supplied to the facility, but also the power and access requirements of fibre routes, exchanges, mobile sites, interconnection facilities and backup communications supporting its operation.

8.4.2 ATA members have experienced lengthy delays in the delivery of supporting infrastructure, demonstrating the importance of coordinated planning between telecommunications, energy, and digital infrastructure sectors.

9. NATIONAL CONSISTENCY AND TASMANIAN COORDINATION

9.1.1 National consistency and effective State regulation are complementary objectives, not competing ones. It should mean that Tasmania addresses matters within its jurisdiction using definitions, metrics, and assurance arrangements that integrate with national frameworks wherever practicable.

9.1.2 Tasmania has legitimate responsibility for land-use planning, environmental assessment, public-resource

management, and local community outcomes. It should exercise those responsibilities through arrangements that complement, rather than duplicate or conflict with, nationally applicable frameworks.

9.1.3 Data centres and telecommunications networks frequently operate across jurisdictional boundaries. Divergent definitions, disclosure metrics, technical requirements, and approval conditions can increase complexity without improving community or environmental outcomes.

9.1.4 The cross-jurisdictional nature of digital infrastructure also means that resilience and sovereignty considerations cannot be addressed effectively through an isolated state framework. Tasmania should contribute to nationally coordinated assessment of material infrastructure dependencies, while ensuring its own planning and resource decisions support secure, resilient, and trusted digital services.

9.1.5 Tasmania should therefore:

- align definitions and reporting metrics with nationally agreed or emerging standards and frameworks, where sufficiently settled and appropriate to Tasmania's jurisdiction;
- recognise substantially equivalent Commonwealth reporting and assurance;
- identify interactions with Commonwealth telecommunications and critical-infrastructure law;
- avoid imposing conditions inconsistent with carrier powers and obligations;
- participate in national infrastructure planning and standard-setting; and
- establish a clear Tasmanian coordination point for major developments.

9.1.6 A regulatory-interaction map could identify the responsible decision-maker, applicable legislation, information required, sequencing, and whether an equivalent obligation exists under another framework. Its purpose would be to expose overlap and gaps, not to alter statutory responsibilities. The map should be publicly available and updated when relevant legislation, reporting arrangements, or institutional responsibilities change.

9.1.7 A Tasmanian coordination function need not replace statutory decision-makers. Its role should be to facilitate early engagement, identify interdependent infrastructure, coordinate sequencing, and ensure that proponents understand the approvals and information required across government. The coordination function could be assigned to an existing Tasmanian body. The ATA does not consider that a new statutory authority is necessarily required.

9.1.8 The coordination function proposed here should also act as the lead coordination point described in section 5.1.

10. RECOMMENDATIONS

10.1.1 The recommendations below are intended to operate as an integrated framework. Together, they would recognise telecommunications as essential data-centre infrastructure, improve the coordination and transparency of project assessment, protect public and community interests, and avoid unnecessary fragmentation across state and national regulatory arrangements.

10.1.2 The ATA's central proposition is that responsible data centre policy requires the facility and its supporting infrastructure to be considered together. The benefits of data-centre investment will not be fully realised if telecommunications capacity, deployment, resilience, cost allocation and community outcomes are addressed only after a development has been approved.

Table: Recommendations

No	Recommendation	Why it matters	Relevant ToR
1	Recognise telecommunications connectivity, resilience, and strategic capacity as essential AI infrastructure.	Data centres cannot operate reliably without telecommunications networks, route diversity, interconnection, and restoration capability. Long-term planning should also consider cumulative demand, infrastructure constraints, and future capacity needs.	1, 2, 7
2	Require integrated infrastructure and connectivity planning up front.	Major developments should demonstrate how energy, water, telecommunications, and other enabling infrastructure will be delivered, funded, and maintained, before approvals are granted	1, 2, 3
3	Adopt a coordinated, risk-based approvals framework.	A proportionate assessment pathway should support timely decision-making, coordinated infrastructure delivery, and accountability across the project lifecycle, including material changes and decommissioning.	2, 5, 7
4	Apply a project-pays principle, and require additional community benefits.	Proponents should fund infrastructure required for their development, while community benefits should be distinguishable from project obligations, and deliver demonstrable public value	1, 6
5	Facilitate deployment of resilient telecommunications infrastructure	Data centre approvals should consider associated fibre and telecommunications infrastructure from the outset, supported by a proportionate planning pathway for strategically important underground fibre routes.	2, 7
6	Improve transparency through standardised reporting while protecting sensitive information	Public confidence is strengthened through consistent disclosure, streamlined reporting arrangements, and appropriate protection of commercially and security sensitive information	3, 4
7	Require meaningful community engagement and measurable Tasmanian benefit commitments	Communities should be able to understand impacts, influence project design, and receive transparent, enduring benefits where public support or access to public resources is provided	5, 6
8	Align Tasmania's framework with national regulation, standards, and resilience planning	National coordination can reduce duplication, support assessment of cross-jurisdictional infrastructure dependencies, and improve resilience while preserving Tasmania's planning and resource responsibilities.	2, 3, 4, 7

Tasmania has an opportunity to establish a framework that protects public resources, supports informed

community participation, and provides confidence that major data-centre developments will deliver enduring benefits. Achieving those objectives requires the facility and its supporting infrastructure to be assessed as an integrated system.

By expressly incorporating telecommunications capacity, deployment and resilience into planning and approval processes, Tasmania can improve the quality of project assessment, identify infrastructure constraints earlier, and support responsible investment without creating unnecessary duplication or regulatory fragmentation.

Ends

APPENDIX

FACILITATING RESILIENT UNDERGROUND TELECOMMUNICATIONS INFRASTRUCTURE TO CONNECT DATA CENTRES

(Please consider in the context of the Tasmanian Planning Scheme at: https://tpso.planning.tas.gov.au/tpso/external/tasmanian-planning-scheme)

For many developments, genuine resilience requires physical route diversity, not simply additional fibre capacity delivered through the same infrastructure corridor. Reliable and resilient data-centre operations depend on high-capacity telecommunications connectivity. In many cases, resilience requires not only additional fibre capacity but genuine physical route diversity, so that separate connections are not exposed to the same conduit, road corridor, bridge crossing or other common point of failure.

The Commonwealth *Telecommunications (Low-impact Facilities) Determination 2018* already facilitates a substantial range of underground fibre deployment. The Tasmanian Planning Scheme (TPS) appropriately recognises this through clause 4.2.6, which exempts specified minor communications infrastructure, including Commonwealth low-impact facilities.

However, where underground fibre falls outside those provisions, the planning framework can move relatively quickly from exempt development to ordinary development assessment under the Telecommunications Code in the Tasmanian Planning Scheme. This may be disproportionate where the physical impacts of the works are limited and capable of being managed through objective standards.

This issue is likely to become increasingly important where new data-centre locations require substantial inter-city or regional fibre routes, including routes outside existing telecommunications or utility corridors.

The ATA recommends the following targeted amendments to the State Planning Provisions.

1. Expand clause 4.2.6 – minor communications infrastructure

Clause 4.2.6 should include an additional State-based exemption for specified underground telecommunications infrastructure that does not otherwise qualify under the Commonwealth low-impact framework.

The exemption could include:

- optical fibre cable, conduit and ducting;
- pits, jointing chambers and minor ancillary infrastructure;
- directional drilling, boring and associated civil works; and
- necessary excavation and reinstatement works.

The exemption should apply to new routes as well as existing conduits or utility corridors. Use of an existing corridor should not be mandatory where a separate route is reasonably required to provide network resilience or avoid common points of failure.

The exemption should be subject to objective construction, disturbance and reinstatement requirements, with appropriate limits on permanent above-ground infrastructure.

2. Retain targeted environmental and heritage assessment

The purpose of the reform would not be to remove existing environmental, heritage or land-use protections.

Where proposed works affect identified environmental, heritage, archaeological, waterway, native vegetation or other sensitive values, the relevant State planning controls and other statutory requirements should continue to apply.

Importantly, where only a particular section of a long-distance fibre route affects a sensitive value, assessment

should focus on that section rather than requiring a development application for the entire inter-city or regional route.

This would allow planning scrutiny to be directed to the location of the **material impact**, while the balance of an otherwise low-impact underground route proceeds under the exemption.

3. Amend C5.0 – Telecommunications Code

The purpose of the Telecommunications Code should be amended to expressly recognise the importance of network resilience and physical route diversity.

An additional Code purpose could provide for:

the facilitation of resilient telecommunications networks, including network capacity and physical route diversity, while avoiding or minimising material environmental, heritage and amenity impacts.

C5.6.1 should also include an achievable 'Acceptable Solution' for underground telecommunications infrastructure where the works are reinstated and create little or no continuing visual impact.

At present, where underground telecommunications infrastructure is not exempt and C5.6.1 applies, the absence of an Acceptable Solution means the proposal must be assessed against the Performance Criteria, even where the works will have little or no ongoing visual impact.

4. Recognise resilience where new routes are required

Where a telecommunications route outside an existing utility corridor requires assessment, the Performance Criteria should expressly recognise:

- physical route diversity;
- avoidance of common points of network failure;
- telecommunications network resilience; and
- the need to provide independent connections to major data centres and other critical digital infrastructure.

This is important because additional fibre within an existing conduit or common corridor may increase capacity without providing genuine resilience.

Proposed outcome

These amendments would provide a proportionate State planning pathway for underground fibre that falls outside the Commonwealth low-impact framework.

The resulting framework would distinguish between:

- underground telecommunications works whose impacts can be managed through objective exemption criteria; and
- those sections of a route where environmental, heritage or other material planning impacts warrant targeted assessment.

This would retain appropriate safeguards while avoiding an unnecessarily binary choice between the Commonwealth low-impact regime and a full development application for an entire strategic fibre route.

For new data-centre development, such an approach would also recognise that construction of a new and physically separate fibre route may itself be an important resilience measure.

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