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AUSTRALIAN TELECOMMUNICATIONS ALLIANCE SUBMISSION ON BEHALF OF THE MOBILE CARRIERS FORUM

To: Department of State Development, Infrastructure and Planning

Re: Review of the South East Queensland Regional Plan and South East Queensland Infrastructure Plan

July 2026

TABLE OF CONTENTS

1. INTRODUCTION

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. For more details, visit www.austelco.org.au.

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In 2026, the Australian Telecommunications Alliance and the Australian Mobile Telecommunications Association (AMTA) merged under the ATA banner, creating a unified industry association representing the broader telecommunications sector, including Australia's mobile telecommunications industry.

AMTA's Mobile Carriers Forum (MCF) now operates within ATA and represents Australia's mobile network operators, including Telstra, Optus and TPG Telecom, on matters associated with the planning, deployment and operation of mobile network infrastructure. ATA's membership also includes mobile network infrastructure providers that build, own and operate the towers and other facilities upon which mobile networks depend.

ATA, on behalf of the MCF, welcomes the opportunity to provide early feedback to the Queensland Department of State Development, Infrastructure and Planning (the Department) as part of the review of the Southeast Queensland Regional Plan (SEQ Regional Plan) and corresponding Southeast Queensland Infrastructure Plan (SEQ Infrastructure Plan).

This is a preliminary submission intended to identify key matters that ATA and the MCF consider should inform the next stage of the review. ATA anticipates providing further detail, including specific recommendations on policy wording and implementation measures, when the draft plans are released for formal consultation.

The MCF and their members have worked closely and constructively with the Council of Mayors Southeast Queensland (CoMSEQ) and the Department on telecommunications planning, digital connectivity and infrastructure issues. This has included industry briefings, engagement on planning reform and collaboration aimed at improving the coordination of mobile infrastructure deployment across SEQ. The MCF was actively engaged with CoMSEQ over several years in the development of the SEQ Digital Plan, including coordinating industry briefings and advocating for a stronger focus on mobile infrastructure, governance and consistent planning settings.

ATA and the MCF values this constructive relationship and see the current Regional Plan review as an opportunity to build on that work. The purpose of this submission is therefore not simply to identify barriers, but to suggest how the Regional Plan and Infrastructure Plan can provide a stronger strategic framework for the initiatives already being progressed collaboratively by government, CoMSEQ and industry.

The review comes at an important time. Southeast Queensland is experiencing substantial population and development growth while simultaneously preparing to host the Brisbane 2032 Olympic and Paralympic Games. These factors will generate significant additional demand for mobile coverage, capacity and network resilience.

The central proposition of this preliminary submission is that mobile telecommunications infrastructure should be expressly recognised, planned, protected and facilitated as essential and regionally significant enabling infrastructure in the SEQ Regional Plan and SEQ Infrastructure Plan.

A regional planning framework that seeks to unlock land for housing, drive industry growth and coordinate infrastructure and services cannot achieve those objectives without facilitating the digital infrastructure upon which new communities, businesses, transport systems, emergency services and increasingly other infrastructure systems depend.

The existing SEQ Regional Plan's aspiration for world-class digital connectivity is welcomed. However, there must be a clearer policy nexus between the desired outcome of digital connectivity and the physical infrastructure required to deliver mobile services.

ATA recognise that local governments across SEQ are essential partners in delivering the digital connectivity outcomes contemplated by the SEQ Regional Plan and the SEQ Digital Plan. Councils are well placed to understand

the local context, character and community expectations that shape planning outcomes. The suggestions in this submission are intended to support councils by providing clearer Regional-level policy direction and consistent regional frameworks, reducing the burden on individual councils to independently resolve complex technical and network-planning matters that are more efficiently addressed at a regional or State level.

2. MOBILE TELECOMMUNICATIONS AS ESSENTIAL ENABLING INFRASTRUCTURE

Mobile telecommunications networks underpin economic activity, public safety, business operations, transport, health, education, tourism and the daily lives of SEQ residents.

Mobile telecommunications facilities should accordingly be recognised in the revised SEQ Regional Plan as essential enabling infrastructure for housing, economic growth, resilience and productivity.

In established and increasingly dense urban areas, population growth, apartment living, transport activity, tourism, major events and business use can materially increase mobile demand within a fixed geographic footprint.

The planning framework should therefore not assume that improved mobile connectivity in dense areas can be delivered solely through upgrades to existing facilities but instead should expressly permit and facilitate new telecommunications infrastructure where it is required to meet demonstrated network coverage, capacity and resilience needs.

Mobile network operators and mobile network infrastructure providers continue to experience significant planning barriers across SEQ, particularly within growth corridors and emerging communities. Whilst operators have powers to deploy certain network infrastructure under Commonwealth legislation, those powers do not extend to the deployment of new towers. Consequently, new mobile infrastructure remains reliant on local planning frameworks, which is where many of the barriers identified in this submission arise. These can include:

- extensive alternative site investigations;
- disproportionate visual amenity assessment requirements;
- repeated challenges to technical design parameters, including tower height and coverage objectives;
- increasingly detailed specialist reporting requirements;
- duplication of technical assessments;
- disproportionate access and civil engineering requirements; and
- inconsistent treatment between local government areas, Priority Development Areas and other planning frameworks.

The cumulative impact is significant. Recent industry data indicates that the average assessment timeframe for mobile telecommunications development applications across Queensland is more than 230 calendar days. The underlying industry survey included 477 development applications nationally, of which 81 were in Queensland.

The experience in the Sunshine Coast Council area is particularly concerning, with industry data identifying an average timeframe of approximately 329 days for mobile telecommunications deployment approvals.

Individual Sunshine Coast examples further demonstrate the extent of the challenge. Recent applications identified by industry include a facility at 33 Rim Road, Buderim that took 377 days to refusal, an application at Sippy Downs that took 481 days to approval, and an application at Woombye that took 664 days to refusal.

ATA recognises that development applications must be appropriately assessed and that individual applications differ in complexity. Nevertheless, these figures point to a broader issue warranting strategic attention.

They are also difficult to reconcile with the pace of housing and population growth contemplated for SEQ. A new community can continue to expand for a year or more while the mobile infrastructure required to provide adequate coverage and network capacity remains within a development assessment process.

The Regional Plan should therefore establish a clear policy expectation that telecommunications infrastructure required to support growth is to be planned for early and facilitated through timely and proportionate planning processes.

ATA submits that the revised plans should:

- explicitly identify mobile telecommunications networks and facilities as essential and regionally significant enabling infrastructure;
- recognise mobile connectivity as necessary to achieve regional objectives for housing, economic development, transport, emergency resilience, productivity, digital inclusion and liveability;
- require mobile connectivity needs to be considered early in planning for new communities, Priority Development Areas and major growth fronts;
- recognise the importance of safeguarding strategically located telecommunications sites and future land requirements, particularly in growth areas;
- encourage appropriate land for mobile telecommunications infrastructure to be considered at the master-planning stage, before development restricts or sterilises suitable locations; and
- encourage coordination between State agencies, CoMSEQ, Economic Development Queensland, local governments, developers, mobile network operators and mobile network infrastructure providers.

3. ALIGNMENT WITH THE SEQ DIGITAL PLAN

The review provides an important opportunity to align the Regional Plan and Infrastructure Plan with the SEQ Digital Plan.

ATA strongly supports the SEQ Digital Plan and considers its relevant priorities should be expressly reflected in the revised regional planning framework.

The Plan represents the product of several years of engagement between CoMSEQ, industry and other stakeholders. ATA, the MCF and members have worked closely with CoMSEQ on the mobile infrastructure components of this work and welcome the Plan's focus on collaboration, long-term infrastructure planning and greater consistency across the region.

ATA and MCF members have similarly sought to work constructively with the Department on broader telecommunications planning reform in Queensland. The Regional Plan review provides an opportunity to connect these parallel streams of work: the strategic regional planning role of the Department and the practical digital infrastructure initiatives being advanced through CoMSEQ.

3.1 PRIORITY MODEL TOWN PLANNING CODE FOR TELECOMMUNICATIONS INFRASTRUCTURE

ATA considers that a Model Town Planning Code for Telecommunications Infrastructure across Southeast Queensland should be a baseline component of the regional planning framework.

- A model code envisaged by CoMSEQ in consultation with various stakeholders including MCF members can:
- harmonise planning requirements across SEQ;
- reduce regulatory fragmentation between councils;
- establish consistent and proportionate assessment standards;
- improve investment certainty;
- support digital inclusion;
- facilitate housing and economic growth; and
- help ensure that digital infrastructure keeps pace with population growth and Brisbane 2032 requirements.

The need for implementation is demonstrated by current excessive assessment timeframes and complexity, and greater consistency in planning requirements has the potential to make a material difference to infrastructure delivery.

The Model Town Planning Code should therefore be viewed not simply as a mechanism to improve regulatory consistency, but as an important means of reducing unnecessary delay and enabling mobile network investment to keep pace with housing and population growth.

The SEQ Regional Plan should provide the strategic policy mandate for development and implementation of the Model Code and encourage its adoption across SEQ local planning schemes and, importantly, within Priority Development Area development schemes.

The model framework should establish workable and proportionate provisions for matters including height, setbacks and separation distances, while allowing appropriate consideration of local circumstances.

It should also support streamlined assessment pathways where telecommunications facilities comply with agreed standards.

3.2 PRIORITY COORDINATED CONNECTIVITY DELIVERY FOR NEW DEVELOPMENTS

The SEQ Regional Plan should also support coordinated delivery of telecommunications infrastructure in new developments, consistent with the Commonwealth's Telecommunications in New Developments (TIND) framework.

From ATA's broader telecommunications industry perspective, coordinated planning should encompass both fixed and mobile connectivity. For the MCF, a particular priority is ensuring that mobile telecommunications infrastructure is considered at the master-planning stage, rather than after new communities have been designed, subdivided and occupied.

Unlike fixed services connected directly to individual premises, mobile services require appropriately located facilities throughout and around a development area. Once land is subdivided and developed, suitable sites can become increasingly difficult to secure.

The revised SEQ Regional Plan should therefore:

- require early consideration of fixed and mobile telecommunications requirements in new developments;
- encourage early engagement with mobile network operators and mobile network infrastructure providers;
- ensure that potentially suitable land for mobile facilities is considered and, where appropriate, safeguarded as part of master planning;
- integrate telecommunications planning into infrastructure sequencing; and
- ensure planning for new communities does not inadvertently create future mobile coverage or capacity gaps.

This approach would help ensure new communities are digitally ready from the outset.

4. A STRONGER STATE-LEVEL POLICY DIRECTION

ATA considers that the SEQ Regional Plan can provide a vehicle for stronger State-level policy direction on telecommunications infrastructure. We understand that the State Planning Policy is also being reviewed at present.

At present, inconsistent local approaches mean that similar telecommunications proposals can face significantly different regulatory requirements depending on the local government area or planning regime in which they are located.

The revised Regional Plan should establish a clear strategic direction that mobile telecommunications facilities are to be planned for and facilitated, with impacts appropriately managed, rather than infrastructure that must continually justify its fundamental need on an application-by-application basis.

Clear Regional-level direction would provide a basis for:

- consistent local planning provisions;
- implementation of the SEQ Model Town Planning Code;
- more proportionate information requirements;
- appropriate code-assessable, accepted or delegated pathways;
- reduced duplication of technical assessment; and
- greater consistency in decision-making.

This is not to suggest that normal planning considerations should be disregarded. Rather, the planning system should appropriately balance matters such as visual and environmental impacts with the technical requirements of mobile networks, demonstrated service need and broader community benefit.

ATA believes that the constructive working relationships already established between industry, CoMSEQ and the Department provide a strong foundation for developing this more coordinated approach.

5. THE REGIONAL PLAN MUST POSITIVELY INFLUENCE LOCAL PLANNING SCHEMES

One of the most important roles of the revised SEQ Regional Plan is to provide strategic direction for the preparation and review of local planning schemes.

This is particularly timely given planning scheme reviews occurring across the region, including in the Sunshine Coast and Logan.

The need for stronger regional direction is demonstrated by the considerable variation in development assessment experience across SEQ. As previously noted, industry data indicates that mobile telecommunications development applications take, on average, more than 230 days to be assessed across Queensland with greater timeframes in parts of SEQ.

These figures are important in the context of a Regional Plan intended to provide the strategic framework for one of Australia's fastest-growing regions. An infrastructure planning framework cannot effectively support accelerated housing delivery if the mobile infrastructure needed to service new and expanding communities routinely takes many months, and in some cases more than a year to progress through local planning processes.

ATA's engagement with Sunshine Coast Council has highlighted concerns that the planning framework does not sufficiently recognise mobile connectivity as enabling infrastructure and that restrictive provisions can substantially constrain the locations in which infrastructure can practically be deployed.

In Logan, the draft planning scheme's strategic framework appropriately recognises the importance of telecommunications and digital infrastructure. However, industry experience demonstrates the need to ensure that strategic connectivity objectives flow through into workable development assessment provisions. Industry has

reported applications taking more than 450 days in Logan, together with concerns about multiple information requests and the weight given to visual impacts relative to service benefits.

The revised Regional Plan should therefore direct local planning schemes to:

1. recognise mobile telecommunications networks and facilities as essential infrastructure;
2. facilitate timely deployment and upgrading of mobile telecommunications infrastructure;
3. provide reasonable and proportionate assessment pathways;
4. support accepted, accepted-subject-to-requirements or code-assessable pathways in appropriate zones and circumstances;
5. avoid arbitrary or effectively exclusionary separation distances and height limits;
6. balance visual amenity against technical network requirements, infrastructure need and community benefit;
7. avoid disproportionate requirements for exhaustive alternative-site investigations;
8. avoid unnecessary duplication of technical or environmental assessments;
9. recognise that telecommunications network design, including facility height and location, is driven by technical network requirements;
10. apply proportionate access, civil engineering and infrastructure requirements having regard to the scale and impact of the development; and
11. align with the SEQ Model Town Planning Code proposed through the SEQ Digital Plan.

6. PRIORITY DEVELOPMENT AREAS AND THE ROLE OF ECONOMIC DEVELOPMENT QUEENSLAND

ATA considers that Economic Development Queensland (EDQ) has the potential to play a particularly important role in accelerating the delivery of digital and mobile telecommunications infrastructure in SEQ's fastest-growing communities.

Priority Development Areas represent a major pipeline for new housing, employment and urban development. They should therefore also be an important mechanism for delivering the SEQ Regional Plan's digital connectivity objectives.

Industry and MCF representatives have engaged directly with EDQ regarding mobile telecommunications infrastructure and the challenges associated with delivering mobile networks in Priority Development Areas. Those discussions have been constructive and have assisted industry in better understanding EDQ's role and processes.

However, those engagements have also highlighted an important opportunity for improvement. It is industry's experience that mobile telecommunications infrastructure does not yet appear to be embedded within EDQ's infrastructure planning and delivery priorities in the same routine manner as transport, water, energy and other essential infrastructure. Consequently, there has to date been limited scope for EDQ to directly facilitate or resolve some of the practical mobile infrastructure deployment issues raised by industry.

ATA does not consider this reflects any lack of willingness on the part of EDQ. Rather, it points to a broader policy gap. Where State and regional planning policy does not clearly identify mobile telecommunications as essential enabling infrastructure, it may not naturally fall within the core infrastructure matters that delivery agencies are expected to proactively plan for and facilitate.

The SEQ Regional Plan review provides an opportunity to address this gap and to provide EDQ with a clearer strategic mandate.

This is particularly important when considered against current development assessment timeframes. Where mobile infrastructure has not been planned for during PDA or master planning, an operator may subsequently need to find a site in an already developing community and then enter an approval process which, based on current industry data, averages more than 230 days across Queensland and approximately 329 days on the Sunshine Coast.

The result can be a substantial lag between housing delivery and provision of the mobile network coverage and capacity required to support that housing.

Clear strategic direction in the Regional Plan would assist EDQ to give greater and more systematic consideration to mobile connectivity when planning and administering PDAs. It would also provide a basis for earlier engagement with telecommunications providers and consideration of mobile infrastructure requirements when land use plans and development schemes are prepared.

ATA recommends that the SEQ Regional Plan include a policy direction to the following effect:

Mobile telecommunications infrastructure is essential enabling infrastructure for Southeast Queensland and should be planned, protected and facilitated as regionally significant infrastructure, including within Priority Development Areas. Development schemes prepared for Priority Development Areas should recognise telecommunications as essential infrastructure, adopt or align with the SEQ Model Town Planning Code for Telecommunications Infrastructure, and require early planning for mobile connectivity consistent with the Commonwealth Telecommunications in New Developments framework.

Practical delivery mechanisms should include:

- **Consistent PDA provisions** – workable and consistent height, setback and separation parameters aligned with the SEQ Model Town Planning Code in new and amended development schemes.
- **Early TIND alignment** – early engagement with mobile network operators and infrastructure providers at the master-planning stage for residential and mixed-use PDAs.
- **Site safeguarding** – land use plans should identify and protect appropriate candidate telecommunications sites where feasible from the outset, in a manner comparable to forward planning undertaken for other infrastructure.
- **Streamlined assessment pathways** – facilities meeting agreed model-code standards should have access to efficient approval pathways, including appropriate delegated or code-assessable processes.
- **A clearer facilitation role** – EDQ should be supported by State policy to actively consider mobile connectivity as part of infrastructure coordination and to assist in bringing together developers, telecommunications providers and relevant government agencies where deployment barriers emerge.

The **Ripley Valley PDA** illustrates the importance of this approach. Telstra has identified circumstances in which telecommunications providers have found it extremely difficult to secure suitable locations for mobile infrastructure as development has progressed because telecommunications land requirements were not sufficiently considered at an earlier stage.

The lesson for future PDAs and growth areas is that mobile infrastructure needs to be considered **before land is fully allocated and developed**, not after coverage and capacity deficiencies emerge.

ATA submits that the objective should be to equip and support EDQ to play a stronger facilitative role, rather than simply adding another regulatory responsibility.

7. SAFEGUARDING TELECOMMUNICATIONS INFRASTRUCTURE AND FUTURE SITES

The revised Regional Plan should introduce a stronger concept of telecommunications infrastructure safeguarding.

This should operate in two ways.

First, existing strategically important telecommunications facilities should be recognised when significant land-use change occurs around them.

Second, in major growth areas, planning should consider future mobile telecommunications land requirements and avoid unnecessarily sterilising potential locations.

As housing and other sensitive land uses expand, the number of technically and commercially feasible telecommunications sites can rapidly diminish. This can lead to the paradoxical outcome that the very population growth creating increased demand for mobile services simultaneously makes the infrastructure required to serve that population more difficult to deploy.

Strategic planning should anticipate and avoid this outcome.

8. DEMONSTRATING COMMUNITY BENEFIT AND INFRASTRUCTURE NEED

ATA acknowledges that industry also has a role to play.

Mobile telecommunications facilities are sometimes considered primarily through the lens of their physical appearance rather than the community and economic outcomes they enable.

There is an opportunity for industry, government and councils to develop a more consistent approach to articulating the community benefit of mobile infrastructure as part of strategic and infrastructure planning.

ATA supports consideration of an industry-led approach to better communicate matters including:

- improvements to mobile coverage and network capacity;
- the population and geographic area benefiting from infrastructure;
- support for new housing and employment areas;
- emergency and disaster resilience;
- transport and road connectivity;
- economic and productivity benefits; and
- the cumulative role individual facilities play within a broader mobile network.

This should not, however, translate into an expectation that every individual development application must repeatedly establish the general community value of mobile telecommunications or undertake disproportionate technical justification exercises.

9. ACCELERATING PRIVATE INVESTMENT AND CO-INVESTMENT

Unlike many infrastructure networks, a substantial proportion of mobile telecommunications infrastructure is financed through private investment by mobile network operators and infrastructure providers.

The Regional Plan should recognise that clear, consistent and timely planning can enable private investment opportunities in digital connectivity by reducing unnecessary regulatory uncertainty and planning delay

There may also be opportunities for co-investment and greater coordination between the telecommunications industry, developers and government where infrastructure requirements are identified early.

A supportive planning environment does not require government to determine individual network investment decisions. Rather, government can maximise the prospect of private investment by ensuring that:

- appropriate sites remain available;
- approval pathways are clear and proportionate;
- regulatory requirements are consistent;
- infrastructure planning occurs early; and
- public and private infrastructure programs are coordinated.

This is an area in which the existing collaborative relationships between ATA, MCF members, CoMSEQ and State the Government can be particularly valuable.

10. BRISBANE 2032 REQUIRES PLANNING FOR THE BROADER MOBILE NETWORK

The Brisbane 2032 Olympic and Paralympic Games provide an additional and increasingly urgent reason to embed mobile telecommunications infrastructure within the Regional Plan and Infrastructure Plan.

ATA acknowledges the Queensland Government's work on Games-related infrastructure and the recognition being given to digital connectivity.

However, there is an important distinction between telecommunications infrastructure delivered within individual Games venues and the broader mobile networks required to support athletes, officials, media, spectators, businesses, transport users and surrounding communities.

Games-related mobile demand will extend to:

- venues and athlete villages;
- transport corridors and stations;
- airports;
- accommodation precincts;
- tourism destinations;
- fan and entertainment precincts; and
- surrounding residential and employment areas.

The current proposal by mobile network infrastructure provider Indara for a telecommunications facility at 33 Rim Road, Buderim provides a useful case study.

The facility is intended to improve coverage and capacity across northern Buderim, Maroochydore, the Wises Road corridor and parts of the Sunshine Motorway. It would improve service for more than 2,000 existing residences, provide capacity relief to surrounding network facilities, support future development and improve connectivity along an important transport corridor.

Its target area is also close to precincts that will play a role in Brisbane 2032, including the planned Maroochydore Athlete Village.

The application was lodged in November 2024 and was refused after approximately **377** days of assessment. It subsequently entered Planning and Environment Court proceedings.

This experience sits within the broader Sunshine Coast context in which industry data identifies an average mobile telecommunications deployment approval timeframe of approximately **329** days.

The significance of these figures for Brisbane 2032 should not be understated.

The issue is not whether any single telecommunications facility will determine Games readiness. Rather, mobile networks will need to be progressively expanded and augmented through many individual projects over the remaining years before the Games. Mobile network infrastructure is delivered incrementally, and the cumulative impact of delays across dozens or potentially hundreds of network projects can substantially reduce the time available to strengthen coverage and capacity before 2032.

The revised plans should therefore:

- expressly recognise mobile connectivity as an element of Brisbane 2032 infrastructure readiness;
- recognise that Games-related telecommunications requirements extend beyond venue boundaries;
- establish stronger coordination between Games infrastructure planning, EDQ, the Department, relevant State agencies, councils and telecommunications providers;
- identify priority growth, transport, tourism and Games-related corridors in which digital connectivity should be considered; and
- ensure planning frameworks across Games host areas facilitate timely investment necessary to prepare networks for 2032.

The investments required for Games readiness will also provide a significant long-term connectivity legacy for SEQ communities.

11. INFRASTRUCTURE RESILIENCE

The SEQ Infrastructure Plan should recognise the role of mobile networks in disaster preparedness, response and recovery.

Southeast Queensland is exposed to flooding, severe storms, bushfire and other natural hazards. Reliable communications are critical before, during and after these events.

Mobile network resilience requires:

- adequate network coverage and capacity;
- network redundancy;
- resilient power supplies;
- backhaul connectivity; and
- timely access to infrastructure for maintenance and restoration.

The Regional Plan and Infrastructure Plan should therefore recognise telecommunications resilience as part of broader regional resilience planning and encourage coordination between telecommunications, emergency management, transport and energy infrastructure.

The Queensland and Commonwealth governments have also invested and co-invested in programs intended to improve coverage and telecommunications resilience. The benefit of these investments can be diminished where funded infrastructure subsequently encounters lengthy or uncertain planning pathways.

12. BROADER BARRIERS TO TELECOMMUNICATIONS INFRASTRUCTURE INVESTMENT

ATA recognises that not every issue affecting telecommunications deployment can or should be resolved through the SEQ Regional Plan.

However, the cumulative regulatory and cost environment is relevant context because it directly influences infrastructure investment decisions.

DEVELOPMENT ASSESSMENT REQUIREMENTS

Industry members report increasingly extensive requirements for alternative site investigations, visual impact assessments and photomontages, cumulative visual analysis, repeated RF modelling, bushfire management plans, vegetation and tree surveys, traffic and access reports, civil and earthworks assessments and, in some circumstances, duplicative electromagnetic energy assessment information.

Many of these assessments will be appropriate in particular circumstances. The concern is where requirements become disproportionate to the scale or potential impact of a telecommunications proposal.

ACCESS AND CIVIL ENGINEERING

Industry has also encountered requirements for substantial access upgrades, engineering certification, easements and consideration of future road upgrades for relatively small telecommunications developments.

Appropriate standards are necessary, but requirements should be proportionate to the actual use and impact of the facility.

LAND ACCESS AND TENURE

Difficulties securing appropriate tenure and access can constrain deployment, particularly where suitable network locations are limited. This reinforces the importance of considering mobile infrastructure sites during strategic and master planning.

COUNCIL RATES AND CHARGES

The telecommunications industry has also raised broader concerns about the cumulative cost environment, including rating and charging arrangements applied to telecommunications sites in some local government areas.

ATA accepts that local government rating policy is not a matter that can be directly resolved through the SEQ Regional Plan but flags it as relevant context for the Government's broader engagement with local government. A policy environment seeking to encourage private investment in essential digital infrastructure should avoid, wherever possible, regulatory, and charging arrangements that disproportionately disincentivise that same investment.

13. PRELIMINARY RECOMMENDATIONS

At this early stage, ATA and the MCF recommend that the revised SEQ Regional Plan and SEQ Infrastructure Plan:

1. Recognise mobile telecommunications infrastructure as essential and regionally significant enabling infrastructure and establish a clear policy nexus between desired digital connectivity outcomes and the physical infrastructure required to deliver mobile coverage, capacity and network resilience.
2. Build upon the collaborative work already undertaken by ATA, the MCF and members, CoMSEQ and the Department, including by expressly supporting relevant priorities of the SEQ Digital Plan, particularly Priority 3.1 concerning a Model Town Planning Code for Telecommunications Infrastructure and Priority 3.3 concerning coordinated connectivity delivery for new developments.
3. Require early consideration of telecommunications infrastructure in growth areas, master-planned communities and new developments, consistent with the TIND framework, including early engagement with mobile network operators and infrastructure providers and appropriate safeguarding of existing strategic facilities, future sites and land requirements.
4. Provide stronger regional and State policy direction for local planning schemes and development assessment, to promote consistent and proportionate telecommunications planning provisions, streamlined delegated or code-assessable pathways consistent with agreed Model Code requirements, and materially reduced development assessment timeframes.
5. Strengthen the role of EDQ in facilitating mobile telecommunications infrastructure within Priority Development Areas, including by requiring early consideration of telecommunications needs in PDA development schemes and land-use planning, safeguarding appropriate future sites, facilitating early industry engagement, and supporting coordination between telecommunications providers, developers and relevant government agencies where deployment barriers arise.
6. Recognise mobile network readiness and resilience as integral elements of regional infrastructure planning, including Brisbane 2032 readiness and broader disaster preparedness, response and recovery planning.
7. Encourage investment and co-investment in digital connectivity through a more certain and enabling planning environment, while supporting a consistent approach to recognising and communicating the community, economic and infrastructure benefits delivered by mobile telecommunications networks.
8. Consider, as part of the Government's broader planning and infrastructure reform agenda, the cumulative barriers to telecommunications infrastructure investment, including development assessment delay and cost, land-access constraints, disproportionate technical and assessment requirements, and local government rating and charging practices.

14. CONCLUSION

ATA and MCF members welcome the opportunity to provide early input into the review of the SEQ Regional Plan and Infrastructure Plan.

As SEQ grows and prepares for Brisbane 2032, mobile telecommunications infrastructure should be treated as a fundamental component of regional growth and infrastructure planning, alongside transport, water and energy. The SEQ Digital Plan and the collaborative work already undertaken between ATA, the MCF, CoMSEQ and the Department provide a strong foundation for this approach.

The revised Regional Plan should move beyond broad aspirations for digital connectivity and establish clear policy support for the land, facilities, coordination and deployment pathways required to deliver mobile coverage, capacity and resilience. This includes planning for mobile infrastructure early, safeguarding appropriate locations,

providing consistent and proportionate approval pathways, and strengthening the capacity of agencies such as EDQ to facilitate delivery.

Current development assessment timeframes reinforce the need for action, particularly in the context of rapid population growth and Brisbane 2032. A clearer regional policy mandate will help ensure that mobile infrastructure is planned and delivered alongside new communities, rather than retrospectively accommodated after development has occurred.

ATA and the MCF look forward to continuing to work constructively with the Department, CoMSEQ, EDQ, local governments and other stakeholders, and to providing more detailed recommendations when the draft SEQ Regional Plan and SEQ Infrastructure Plan are released for formal consultation.

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