

28 August 2025

Angela Moody
Productivity Commissioner and Chair
Construction Productivity Inquiry
Queensland Productivity Commission
e: enquiry@qpc.qld.gov.au



Dear Commissioner,

Opportunities to Improve Construction Industry Productivity

AMTA is the peak industry body representing Australia's mobile telecommunications industry. AMTA members include Mobile Network Operators such as Telstra, Optus and TPG Telecom and Mobile Network Infrastructure Providers that build and own telecommunications towers.

Our members continue to make significant network infrastructure investments to provide new or augmented mobile network infrastructure including towers and antennas to service communities across Queensland. However, progress has been significantly hindered by lack of recognition of critical mobile infrastructure in State policy, inadequate strategic planning, and a cumbersome development approval process. This has presented challenges for our members in a range of scenarios, including securing approval for the timely provision of infrastructure in growth areas in South-East Queensland, provision of new towers as part of government co-funded projects, and it has impacted opportunities for investment in underserved regional and remote communities.

For the past five years AMTA has sought to work constructively with each State and Territory, including Queensland on various planning reform initiatives. Priorities for each jurisdiction were identified in the 2021 AMTA 5G State and Territory Readiness Assessment¹, and AMTA has published a Model Framework for State and Territory planning reform in late 2023². Whilst significant reforms have occurred in line with these initiatives in some States and Territories, unfortunately they have not yet progressed in Queensland.

Mobile Telecommunications enables productivity growth

Mobile telecommunications is an enabling technology because it underpins advancements and innovation across numerous sectors, driving economic growth, productivity, and societal benefits by providing the necessary connectivity for new applications and services.

For example, in the construction industry, mobile tech already helps workers stay connected, safe and efficient on site. But by 2030 tools like 5G, AI and wearables will take this further, transforming how jobs are planned, monitored and delivered. AMTA's '[Future of mobile](#)' project contains further information on how mobile enables the construction industry.

What's clear is that mobile telecommunications and its associated network infrastructure is in high demand for connectivity both now and into the future. Data traffic continues to increase exponentially year on year, with video calling and streaming contributing significantly to this use of data. Between 2023 and 2024 the volume of data downloaded by mobile services increased by 33%³ and this is set to continue.

¹ AMTA State and Territory 5G Readiness Assessment <https://amta.org.au/archive/5g-infrastructure-readiness-assessment/>

² AMTA State and Territory Model Planning Framework <https://amta.org.au/mobile-networks/technology-infrastructure-mobile-networks/model-framework-for-mobile-infrastructure/#:~:text=AMTA%20has%20developed%20a%20model,tenure%20for%20mobile%20telecommunications%20infrastructure.>

³ <https://www.acma.gov.au/sites/default/files/2024-12/How%20we%20use%20the%20internet%20-%20Executive%20summary%20and%20key%20findings.pdf>

Queensland Productivity Commission Interim Report

AMTA welcomes the publication of the Commission's Interim Report: 'Opportunities to improve productivity of the construction industry (2025)', and in particular its focus on the need for improvements to the regulatory framework for the assessment of development.

The growing regulatory burden confronting the mobile telecommunications industry in Queensland is in stark contrast to other States and Territories that have initiated and delivered reforms to Planning Policy and assessment processes. Therefore, the section of the interim report 'Improving Approval Processes' which highlights the benefits of harmonising and simplify planning regulations is of particular interest to AMTA members. It calls out the need for a review to align Queensland's planning and building laws to eliminate overlaps and inconsistencies, and the standardising of key requirements (such as zoning categories, design/siting codes) across all local governments.

Whilst the focus of the report is on the housing sector; it discusses additional issues raised in stakeholder submissions that may have a significant impact on construction productivity. This includes Utility connections for new developments, with the report highlighting that for many stakeholders, securing utility connections has become a key 'pain point' that is hampering the timely delivery of residential and commercial construction projects and resulting in significant and unplanned additional costs. The Federal Government's Telecommunications in New Developments Policy (TIND) points out that *'Where mobile coverage is not included in the design of new developments or expanding suburbs, there will likely be diminished digital connectivity and inclusion outcomes for residents in those areas. Having reliable mobile access is no longer a luxury – it is essential to maximise educational and economic opportunities and take advantage of a digital society. More importantly, lives may be at risk during emergencies or natural disasters, as it limits the ability to call Triple Zero, particularly when outside premises'*⁴.

Planning reform for mobile telecommunications

A key area constraining efficient network deployment and introducing costs and delays is infrastructure planning and the lack of harmonisation across federal, state and local governments. Current highly discretionary planning regulations create unnecessary roadblocks for deployment and hinder the ability of mobile network operators to meet the growing connectivity demands of our population. There is an important productivity link between local and state government planning, and deployment of mobile infrastructure in Australia.

Successive inquiries and reviews have recommended urgent reform, including:

- The ACCC Regional Mobile Infrastructure Inquiry (2022)
- The House of Representatives Inquiry into co-investment in multi-carrier regional mobile infrastructure (2023)
- The Mobile Telecommunications Working Group (MTWG) Report (2024)
- The 2024 Regional Telecommunications Review Report which called for the expedition of planning approvals.

Streamlined and harmonised planning for mobile telecommunications infrastructure in Queensland

Regulation of telecommunications has traditionally been a Commonwealth responsibility, but Australia's State and Territory governments also play a significant role when it comes to telecommunications infrastructure. At present there is a labyrinth of planning regulation in Queensland that is an impediment to the efficient, equitable and effective deployment of mobile infrastructure. This introduces fragmentation, inconsistency, duplication and most importantly, delay to delivering networks and services to consumers. With a lack of State and Regional Policy, and 77 Councils administering Planning Schemes in Queensland, there is a patchwork of rules in planning schemes and processes that are wholly inconsistent and require significant time and financial resources to navigate.

⁴ <https://www.infrastructure.gov.au/departments/media/publications/2024-telecommunications-new-developments-policy>

The purpose of state and territory planning systems for telecommunications network deployment is two-fold: promoting network infrastructure development for social and economic benefits and minimising the negative impact on amenity from infrastructure like towers. Governments assess and balance these aspects to determine if a net-community benefit is achieved.

In some states, territories, and councils, governments have codified clear planning rules that balance service benefits with amenity impacts. These rules include objective criteria—such as height limits, setbacks, and view-line protections—reducing the need for subjective assessments. This approach promotes clarity and consistency in achieving planning objectives, but this is often not the case in Queensland.

When seeking to deploy new telecommunications towers or poles in Queensland, the industry is confronted with local planning schemes that vary widely in how (or if) they permit mobile infrastructure. Planning requirements are inconsistent across councils, and some schemes impose onerous restrictions that greatly limit viable sites. They are also characterised by restrictive Codes, outright prohibitions, and highly subjective variations in interpretation. For a subjective and full impact assessment in Queensland, this can take approximately 5-6 months. By contrast, the New South Wales statewide ‘complying development’ pathway allows approval within 45 days in many rural and industrial areas, including mandatory Industry Code consultation.⁵ The NSW approach, which was introduced in 2010, has now contributed to accelerated rollouts of mobile infrastructure for 15 years, which has delivered significant benefits to underserved communities.

Such a streamlined, objective process encourages mobile network operators to deploy infrastructure without formal approval when siting and design standards are met. Similar planning provisions to NSW that are now found in the Northern Territory, and to a lesser extent Victoria have also proven effective. However, Queensland has not implemented equivalent reforms, resulting in fragmented planning, higher costs, and reduced certainty—delaying infrastructure rollout and service improvements.

Mobile and digital infrastructure is often cited as critical infrastructure, particularly in times of natural disaster. However, importantly, the industry is not provided with the same access rights and exemptions from planning as other utilities. This creates an asymmetrical regulatory burden on the mobile network operators compared with other utility providers.

Mobile telecommunications will play a pivotal role in the success of the Brisbane 2032 Olympics and Paralympics, facilitating uninterrupted connectivity, enhancing fan engagement, and optimizing logistical operations. These Games are poised to be among the earliest to harness the capabilities of 6G technology. Without the timely approval of mobile telecommunications infrastructure, the Games risk facing connectivity challenges, hindering both the experience for attendees and the efficiency of critical operational functions.

For a full overview of Queensland Planning Reforms that AMTA is seeking, please refer to Attachment A.

Further Information

We look forward to the outcomes of this Inquiry, and we encourage the Commission to consider the direct and indirect productivity advances and community benefits enabled via improvements to our members’ mobile telecommunications networks. If AMTA can be of any assistance, I can be contacted via email

[REDACTED] or please contact our Mobile Carriers Forum consultant Matt Evans on [REDACTED]

Yours sincerely,



Louise Hyland
Chief Executive Officer
Australian Mobile Telecommunications Association Ltd

⁵ https://www.acma.gov.au/sites/default/files/2025-03/mobile_phone_base_station_deployment_code_c564_2025.pdf

Attachment A: Summary of proposals for planning reform in Queensland to support mobile network deployment

Overview

Mobile connectivity is essential for Queensland's communities and economy. However, the current planning framework in Queensland presents significant challenges to deploying mobile network infrastructure (telecommunications towers and facilities). This summary highlights the key challenges – from the lack of clear state policy direction to inconsistent local planning rules, council resistance, high deployment costs, and land access barriers – and outlines recommended reforms to address these issues, and to facilitate better mobile coverage and capacity across Queensland.

| Key Challenges | Recommended Reforms |
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| <p>Lack of State Policy Direction on Mobile Infrastructure</p> <p>Queensland's State Planning Policy (SPP) – the document guiding local planning schemes – contains no specific reference to mobile telecommunications infrastructure. This omission is alarming given that the SPP explicitly addresses other forms of infrastructure (e.g. transport, water) but is silent on mobile infrastructure. While the SPP defines communications facilities as “<i>Essential Community Infrastructure</i>”, it fails to emphasise the critical nature of mobile network infrastructure in practical terms. In effect, the State's highest planning instrument does not signal to councils that mobile connectivity should be prioritised, aside from a tangential mention of broadband in a liveability context. Regional plans offer only limited improvement – for example, the South-East Queensland Regional Plan 2023 aspires to “<i>world class digital connectivity</i>” but gives no direct support or recognition to mobile network infrastructure or facilities needed to achieve it.</p> <p>Mobile telecommunications will play a pivotal role in the success of the Brisbane 2032 Olympics and Paralympics, facilitating uninterrupted connectivity, enhancing fan engagement, and optimizing logistical operations. These Games are poised to be among the earliest to harness the capabilities of 6G technology. Without the timely approval of mobile telecommunications infrastructure, the Games risk facing connectivity challenges, hindering both the experience for attendees and the efficiency of critical operational functions.</p> <p>Without clear state-level guidance, local governments receive no strong policy mandate to accommodate or plan for mobile infrastructure. If the Queensland Government does not explicitly call out the importance of mobile connectivity, it is less likely that local Councils will consider it in their own policy making. In short and in contrast to other jurisdictions, Queensland's planning</p> | <p>Recommendation</p> <p>Embed mobile telecommunications as a critical state interest in planning policy. The Queensland Government should update the State Planning Policy to explicitly include mobile network infrastructure as critical infrastructure. This would guide councils to proactively plan for and support mobile coverage. Similarly, regional plans should be amended to recognise the infrastructure needed for digital connectivity. Clear state policy direction will set consistent expectations that modern communications networks are a priority for development planning, just like roads or utilities.</p> |

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| <p>framework lacks a cohesive vision for mobile infrastructure, contributing to patchy and reactive local approaches.</p> | |
| <p>Inconsistent Local Planning Schemes and Restrictions.</p> <p>In the absence of strong state guidance, local planning schemes vary widely in how (or if) they permit mobile infrastructure. Planning requirements are inconsistent across councils, and some schemes impose onerous restrictions that greatly limit viable sites:</p> <ul style="list-style-type: none"> • Restrictive Codes: Many councils have bespoke Telecommunications Facility Codes with stringent criteria. For example, Gold Coast's code caps tower heights at 20m in residential zones (30m elsewhere) and requires significant setbacks and camouflaging. Cairns' planning scheme mandates towers be 400m from any sensitive use (homes, schools, etc.) and 1km away from any other tower unless co-sited. Similarly, the Sunshine Coast Planning Scheme provisions include 'acceptable outcomes' requiring a facility is located at least 400 metres from any residential use or park, 20 metres from any public pathway and at least 1 kilometre from any other existing or approved telecommunications facility. Such rules, often well-intended for visual amenity, can severely constrain network deployment by excluding most urban locations (refer attachment B for how this impacts the Sunshine Coast). In contrast, some regional councils (e.g. Isaac) have more reasonable codes – highlighting a lack of consistency in standards. • Outright Prohibitions: In extreme cases, certain areas completely prohibit new mobile facilities. A notable example is the North Lakes estate in Moreton Bay, a community of 24,000+ residents developed under a special planning regime. There, telecommunications towers are classified as a "Prohibited" use in all zones except two small business-oriented zones. This means in the vast majority of the area it is impossible to submit a DA for a new mobile facility, effectively blocking deployment of any new coverage sites regardless of merit. Such blanket bans are rare but underscore how some local frameworks can entirely shut out essential infrastructure. • Variations in Interpretation: Even where local codes exist, council interpretation can differ. For instance, Logan City's Telecommunications Code is relatively basic and permissive, however council officers instead ask for excessive supporting information (not required by the code) as part of the assessment process. Similarly, the Gold Coast's and Cairns' broad provisions can be applied in a way that restricts almost any visible tower. This patchwork of rules creates uncertainty and complexity for mobile providers deploying networks across multiple jurisdictions. • Where an area is classified as a Priority Development Area (PDA), the planning regime put in place must be required to include mobile telecommunications infrastructure when considering emerging infrastructure requirements for the PDA. In addition, when a PDA is declared and an Interim Land Use Plan is in place, this can remove planning pathways until | <p>Recommendation</p> <p>Promote a consistent, supportive planning approach statewide. Queensland should consider developing model planning provisions or a State Code for telecommunications facilities, ensuring all councils apply reasonable, uniform standards. This could set clear parameters (e.g. standard height limits, setback requirements, and community safeguards) while preventing extreme measures like blanket prohibitions. Councils would retain input on siting, but within a framework that guarantees at least some viable locations for needed infrastructure. Standardising rules will reduce confusion and delays, and ensure no community is left behind due to an overly restrictive local plan. AMTA's State and Territory Model Framework offers some suggestions that have been applied in other jurisdictions.</p> |

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| <p>the State finalises the PDA which could take years. During that time, development at sites within these areas cannot proceed leading to long delays in infrastructure deployment. For example, the industry has been confronting this challenge in Caboolture West¹.</p> | |
| <p>Council Resistance and Procedural Barriers</p> <p>Beyond written rules, attitudes and processes at the local council level often impede mobile infrastructure projects. AMTA members have been confronted with a pattern of council resistance to development applications (DAs) for new towers, even when proposals meet technical requirements. Key issues include:</p> <ul style="list-style-type: none"> • Default Opposition to Towers: Some councils reflexively oppose almost any new tower in their area. This includes when the industry is seeking to locate a new telecommunications facility on council managed land where this represents the best planning outcome. This step happens prior to the planning assessment and failure to reach such agreement with council can often delay or permanently frustrate a project. • Lack of Priority: Despite being critical infrastructure, DAs for telecommunications facilities generally aren't prioritised or expedited in any way. This can be frustrating for communities that desperately need coverage. • Excessive Information Requests: Several councils use the information request stage of the DA process to impose heavy burdens on applicants. • Politically Driven Delays: Especially in cases with vocal resident opposition, councils may drag out decisions or impose conditions to appease objectors, sometimes contrary to planning merit. • AMTA would be pleased to provide examples of these issues upon request. The consequence of these behaviours is that telecommunications providers face protracted, uncertain approval processes at the local level, even for technically sound projects. Some search areas are abandoned altogether due to council attitudes which means communities in those areas miss out on coverage improvements. | <p>Recommendation</p> <p>Strengthen guidance and oversight for local decision-making. All councils should be reminded that mobile connectivity is critical infrastructure and should be treated as such. The State could issue guidance or directives discouraging unreasonable information demands and encouraging councils to work constructively with carriers (for example, by focusing on mitigating genuine impacts rather than seeking to block projects) and open up council land for telecommunications sites. Consideration should be given to expedited assessment pathways for telecommunications facilities – e.g. making more proposals subject to code-assessment or deemed approval if councils do not decide within statutory timeframes. Additionally, capacity-building for council planners (through AMTA or state-led training) could help address misconceptions about health or visual impacts and promote fact-based, consistent assessments. In cases of persistent, unjustified opposition, the State Government might explore using call-in powers or Ministerial designations as a last resort to ensure this infrastructure isn't stymied, although the preference is to fix the system so that such measures are rarely needed.</p> |
| <p>High Development Application Costs and Delays</p> <p>Deploying mobile infrastructure in Queensland not only takes time – it is also more expensive due to high fees and legal costs in the planning process. DA fees in Queensland are significantly</p> | <p>Recommendation</p> <p>Reduce financial and procedural barriers in the approval process. The State Government, possibly in</p> |

¹ <https://www.statedevelopment.qld.gov.au/news-and-events/structure-planning-for-the-future-of-caboolture-west#:~:text=Caboolture%20West%2C%20identified%20as%20one,home%20to%20around%2070%2C000%20people.>

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| <p>higher than in other states. Unlike some jurisdictions where fees scale with project value, Queensland councils often set fee amounts at their discretion, not necessarily tied to the complexity of assessment. In some cases, councils appear to use steep fees as a deterrent for unwanted proposals.</p> <p>A sampling of council fees for a single tower DA shows charges often ranging from \$5,000 to over \$10,000. For instance, Sunshine Coast Regional Council charges around \$6,850 for code-assessable and \$10,275 for impact-assessable telecom DAs. Several rural and regional councils also impose fees in the \$5k–\$8k+ range. At the extreme, Noosa Council applies a “three-times escalator” for applications it deems inconsistent with its scheme – leading to a potential fee of \$41,817 for a single tower proposal. These costs, multiplied across many sites, represent a major financial burden on network rollout. High upfront fees can discourage carriers from pursuing needed sites, particularly in areas where the business case for new infrastructure is marginal and divert funds that could otherwise go into better technology or more coverage in these areas.</p> <p>Moreover, when councils refuse an application and the carrier must appeal, the costs escalate dramatically. In Queensland, appeals go to the Planning and Environment Court, a formal legal process requiring specialist lawyers. This process is extremely expensive and time consuming, unlike in Victoria where a proponent can represent themselves in a tribunal. Even uncontested or settled appeals can take the better part of a year – a recent appeal for a facility in Yarrabilba, settled through mediation, took 11 months from lodgement to outcome. A fully contested court hearing would take even longer, with legal fees generally running into hundreds of thousands of dollars. These costs ultimately act as a disincentive to invest in infrastructure, or they ultimately get passed on, impacting consumers and the economy.</p> | <p>consultation with local government, should review the fee structures for telecommunications DAs. Introducing guidelines or caps for fees (e.g. tying fees to actual assessment effort) would prevent councils from levying prohibitively high charges. At a minimum, fees for facilities that improve critical infrastructure should be kept reasonable. Additionally, streamlining the appeals process is key. Options include establishing a less formal dispute resolution mechanism for infrastructure (similar to other states’ tribunals) or providing targeted legal cost support or fast-track procedures for appeals involving critical infrastructure. By cutting down on excessive fees and delays, Queensland can encourage more investment in mobile coverage, as providers will have more certainty and lower risk when navigating the planning system.</p> |
| <p>Land Access and Tenure Challenges</p> <p>Even after securing development approvals, mobile network operators face challenges related to land access and tenure laws in Queensland. Whilst not a planning consideration, this issue was identified by the Mobile Telecommunications Working Group as being a priority. A recent legislative change in Queensland has introduced new hurdles for carriers and tower companies in managing their sites. The change to the Property Law Act 2023, which came into effect in August 2025, replaces a longstanding 1974 Act. Section 142 of the new Act will change the way that properties can be accessed, whereby telecommunications site owners must now provide at least one month’s notice to landowners before accessing their property for maintenance or upgrades. Crucially, we understand this law applies <i>“despite any agreement to the contrary,”</i> meaning it overrides existing lease contracts that previously allowed routine site access.</p> | <p>Recommendation</p> <p>Modify access notification requirements so that carriers can perform maintenance and upgrades on existing sites with appropriate but not inhibitive notice. Introduce a statutory mechanism to resolve access disagreements quickly (avoiding the need for Supreme Court action in most cases) and honour prior lease terms that allowed reasonable access.</p> |

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| <p>Council Rating</p> <p>Our members are increasingly confronted with punitive measures such as special rating categories that unfairly penalise telecommunications infrastructure. A council in South-East Queensland is actively seeking to reclassify and uplift the rental arrangements for telecommunications towers. Telstra has been advised that the rental for one specific tower within that LGA could see an uplift from \$2,500 PA to \$52,000 PA. Such an uplift is simply unsustainable for the telecommunications industry and won't result in improved service outcomes or economic growth in the region.</p> | <p>Recommendation</p> <p>Ensure that local government practices (such as special rating categories) do not unfairly penalise telecommunications infrastructure. There have been several recent examples of councils disproportionately increasing rates for telecommunication sites compared to other commercial users. Although these rate increases have not impacted current infrastructure deployment, if councils continue to raise rates in this manner, it could become a relevant consideration for the industry when planning future sites. The State should consider oversight or guidelines for councils on treating telecommunications sites– as services to be accommodated, not targeted for revenue</p> |
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Conclusion and Key Reforms

Queensland's planning and related regulations have not kept pace with the needs of all Queenslanders for access to critical mobile telecommunications networks. Addressing these challenges is critical to improve mobile coverage and capacity, support 5G rollout, and enhance resilience for emergency communications across the state. Policymakers should view mobile infrastructure as integral to Queensland's growth and liveability and ensure the planning system facilitates – rather than frustrates – its deployment.

In summary, the following actions are recommended to enable efficient mobile infrastructure development:

- **Embed Mobile Infrastructure and Connectivity in State Policy:** Update the State Planning Policy to explicitly include mobile telecommunications infrastructure as a state interest and critical infrastructure, guiding all councils to plan for and support network deployment.
- **Standardise Supportive Planning Rules:** Develop a consistent statewide code or guidelines for telecommunications facilities to be adopted across local planning schemes. This should prevent outright prohibitions and overly onerous local requirements, while still addressing genuine amenity concerns in a balanced way.
- **Facilitate Council Approvals:** Encourage and, where necessary, direct local councils to streamline approvals for mobile infrastructure, including appropriate exemptions. Limit excessive information requests and ensure that if proposals meet the standard criteria, they can be fast-tracked. Councils should be encouraged to make land available for telecommunications facilities where other options have been exhausted.
- **Inclusion of Telecommunications in Priority Development Areas:** Where an area is classified as a Priority Development Area (**PDA**), the planning regime put in place must be required to include mobile telecommunications infrastructure when considering emerging infrastructure requirements for the PDA.
- **Regulate Application Fees:** Work with councils to keep DA fees reasonable for telecommunications projects. Set guidelines or caps to stop the use of exorbitant fees (e.g. \$10k–\$40k per application) as a deterrent. Lower fees will accelerate investment in coverage, especially in regional areas.

- **Improve Dispute Resolution:** Make the planning appeals process more accessible and less costly for critical infrastructure. Consider establishing a mediation or tribunal process (in lieu of full court litigation) for resolving disputes over tower proposals or empower a state umpire to step in when an impasse occurs. This would save time and money for both industry and councils.
- **Amend Land Access Law:** Modify the recent access notification requirements so that carriers can perform maintenance and upgrades on existing sites with appropriate but not inhibitive notice. Introduce a statutory mechanism to resolve access disagreements quickly (avoiding the need for Supreme Court action in most cases) and honour prior lease terms that allowed reasonable access.
- **Prevent Punitive Land Measures:** Ensure that local government practices (such as special rating categories) do not unfairly penalise telecommunications infrastructure. There have been several recent examples of councils disproportionately increasing rates for telecommunication sites compared to other commercial users. Although these rate increases have not impacted current infrastructure deployment, if councils continue to raise rates in this manner, it could become a relevant consideration for the industry when planning future sites. The State should consider oversight or guidelines for councils on treating telecommunications sites— as services to be accommodated, not targeted for revenue.