

Tuesday, 24 February 2026

Brisbane City Council  
Brisbane Square, 266 George Street  
Brisbane Qld 4000  
Via email:

### **Suburban Pub Stays Strategy Submission**

Date	24 February 2026
Prepared by	Australian Institute of Architects, Queensland Chapter

#### **1. Purpose of submission**

The Australian Institute of Architects (the Institute), Queensland Chapter, provides this submission in response to Brisbane City Council consultation on the Suburban Pub Stays Strategy.

This submission addresses the strategic intent of the proposal and provides recommendations in relation to the planning and design matters identified by Council, including:

- design criteria
- car parking rates
- locational requirements
- incentive settings
- assessment and design governance considerations.

The Institute supports Council's objective to increase short-stay accommodation capacity in appropriate suburban locations, while emphasising that any planning reform should be framed to secure high-quality built form, public realm and neighbourhood outcomes.

#### **2. About the Australian Institute of Architects**

The Australian Institute of Architects is the peak body for the architectural profession in Australia. The Queensland Chapter represents members across metropolitan and regional Queensland, including architects working in private practice, government, education and allied sectors.

The Institute advocates for the role of good design in delivering public benefit, including improved liveability, sustainability, resilience, accessibility and long-term economic value.

#### **3. Strategic position**

##### **3.1 In-principle support**

The Institute supports the Suburban Pub Stays Strategy in principle.

Council's stated intent to facilitate additional accommodation supply in advance of the 2032 Olympic and Paralympic Games, while creating longer-term suburban legacy benefits, is supported. The Institute also acknowledges Council's stated objective of balancing accommodation growth with protection of long-term rental housing supply.

### **3.2 Need for quality-based implementation**

The Institute's central position is that this strategy should be implemented as a quality-led planning and urban design initiative, not solely as a mechanism to increase yield or reduce development controls.

Suburban pub sites are often prominent local sites with direct interfaces to residential neighbourhoods and local centres. Planning changes should therefore be calibrated to achieve:

- context-responsive built form
- protection of residential amenity
- improved streetscape and public realm outcomes
- climate-responsive and subtropical design
- long-term adaptability and legacy value.

The Institute also notes that many suburban pub sites may include existing buildings, additions or site elements with local heritage, character or social significance. Council's policy settings should encourage adaptive reuse and sensitive retrofit as a preferred pathway where feasible, to retain embodied carbon, strengthen local identity and support more efficient delivery. Where heritage protections apply, the strategy should reinforce high-quality design responses that integrate new accommodation without undermining heritage significance.

## **4. Key planning and design principles**

The Institute recommends that Council adopt the following principles to underpin the strategy and any associated planning amendments.

### **4.1 Quality-first planning reform**

Any incentives or concessions should be contingent upon the achievement of defined design and amenity outcomes.

### **4.2 Context-responsive development**

Policy settings should recognise differences in site size, centre typology, transport access, surrounding land uses and interface conditions. A uniform approach across all suburban pub sites is unlikely to produce consistent quality outcomes.

### **4.3 Long-term legacy value**

Accommodation delivery associated with 2032 should be planned as lasting suburban infrastructure that can continue to support tourism, local economic activity and community use beyond the Games period.

### **4.4 Protection of neighbourhood amenity**

Policy settings should require clear and enforceable responses to noise, privacy, servicing, lighting, traffic and operational impacts, particularly for sites adjoining residential areas.

### **4.5 Climate-responsive and resilient outcomes**

Planning settings should embed subtropical design, landscaping and environmental performance as core criteria rather than optional considerations. The Institute recommends that Council also frame the strategy to support circular economy outcomes, including adaptive reuse, design for disassembly, material recovery and low waste fitout approaches where feasible. This would align with the Institute's decarbonisation advocacy and broader Australian Government policy settings on net zero emissions and circular economy transition.

## 5. Detailed comments and recommendations

### 5.1 Design criteria

The Institute strongly supports inclusion of explicit design criteria and considers this to be the most critical element of the strategy.

#### 5.1.1 Recommended policy approach

Council should adopt a performance-based design framework supported by guidance material (for example, a dedicated design guideline or strategy implementation guide). In developing guidance material, Council may draw from recognised best-practice frameworks (for example, contemporary fitout and community sustainability guidance) as precedent references, without requiring formal rating tool certification.

#### 5.1.2 Recommended design criteria

The framework should address, at minimum, the following matters:

##### A. Built form and massing

- Site-responsive building envelopes
- Articulation and facade modulation to reduce perceived bulk
- Appropriate setbacks and transitions to lower-scale interfaces
- Upper-level treatment and separation to sensitive boundaries

##### B. Residential interface and amenity

- Privacy and overlooking controls
- Acoustic design requirements (including plant, loading and outdoor activity areas)
- Service and waste management placement and screening
- Lighting spill and late-night operational impacts

##### C. Streetscape and public realm

- Active and legible street frontages
- Pedestrian-priority site entry arrangements
- Minimisation of blank walls and service-dominated frontages
- Integration of landscape and shade within front setbacks and forecourts

##### D. Landscape and green infrastructure

- Deep planting provision where site dimensions permit
- Tree canopy retention and replacement requirements
- Landscape buffers to sensitive interfaces
- Water-sensitive urban design responses

##### E. Climate-responsive and sustainable design

- Solar control and facade shading
- Access to daylight and natural ventilation
- Energy and water efficiency measures
- Rooftop heat mitigation and solar readiness, where feasible

##### F. Accessibility and inclusion

- Step-free access to public and accommodation areas
- Accessible room provision and circulation
- Inclusive design measures beyond minimum compliance, where practicable

##### G. Adaptive reuse, circularity and fitout design

- Retention and adaptive reuse of existing building elements where feasible
- Design for disassembly and future adaptation of temporary or event-driven accommodation components

- Preference for modular and demountable fitout systems to reduce waste and support reuse
- Material selection and specification practices that support lower embodied carbon and circular procurement outcomes
- End-of-life and deconstruction planning for temporary or post-Games scenarios

#### H. Cultural and place-based outcomes (including First Nations engagement)

- Early engagement approaches that recognise local cultural histories and place identity
- Opportunities for First Nations participation in placemaking, public realm expression and procurement where appropriate
- Design responses that strengthen local identity and community connection as part of long-term legacy outcomes

#### 5.1.3 Recommendation

Council should prepare and publish a Suburban Pub Stays Design Guide (or equivalent implementation guideline) to support applicants, consultants and assessment officers.

### **5.2 Car parking rates**

The Institute supports review of car parking rates as part of the strategy, subject to a location-specific and urban design-led approach.

#### 5.2.1 Planning considerations

Parking rates should be calibrated to:

- public transport availability
- walkability and local service access
- centre hierarchy and land use context
- operational needs (including drop-off, loading and servicing)
- potential impacts on surrounding local streets.

Over-provision of parking may undermine feasibility and produce poor urban outcomes, including excessive hardstand, reduced landscaping and inactive frontages. Conversely, under-provision without appropriate transport planning may create local amenity and traffic impacts.

Given the strategy's 2032 context, Council should also consider how parking provision can avoid locking in long-term over-supply after peak event demand. Site planning should support adaptable or reversible parking outcomes where feasible, including landscaping uplift and future repurposing of surplus hardstand areas.

#### 5.2.2 Recommended policy approach

Council should adopt:

- tiered parking rates based on accessibility and centre context
- scope for merit-based parking reductions where supported by evidence, including transport accessibility, shared parking arrangements, travel demand management measures, and pedestrian and cycling access improvements.
- temporary or staged parking arrangements where supported by an operational and legacy transition plan

#### 5.2.3 Recommendation

Any parking concessions should be linked to minimum site planning and urban design outcomes to avoid parking-led development forms.

### **5.3 Locational requirements**

The Institute strongly supports locational criteria and does not support blanket application of incentives across all suburban pub sites.

5.3.1 Suitable locations should generally include sites that:

- are within or adjoining centres or activity nodes
- have access to public transport and local services
- can accommodate additional development with manageable interface impacts
- present an opportunity to improve local streetscape, activation and economic activity.

5.3.2 Locations requiring caution or exclusion may include sites that:

- are isolated and highly car-dependent
- have constrained access or poor pedestrian connectivity
- have particularly sensitive residential interfaces that cannot be mitigated
- are significantly constrained by flood, environmental or infrastructure issues unless satisfactorily resolved.

5.3.3 Recommendation

Council should establish a site suitability assessment framework to guide where incentives or streamlined pathways apply.

#### **5.4 Incentive policy settings**

The Institute supports a targeted incentive approach where incentives are tied to public benefit and verified design performance.

5.4.1 Recommended incentive principles

Incentives should be:

- targeted
- transparent
- performance-based
- proportionate to the design quality and public benefit achieved.
- legacy-oriented (including post-2032 adaptability and ongoing competitive value)

5.4.2 Potential incentive mechanisms (subject to safeguards)

Potential mechanisms may include:

- streamlined assessment pathways for proposals meeting defined criteria
- limited and context-responsive flexibility in built form controls
- parking concessions in accessible locations
- flexibility for supporting uses that improve activation and viability.

5.4.3 Conditions for access to incentives

To access incentives, applicants should demonstrate:

- high-quality architectural design
- positive streetscape/public realm outcomes
- compatible residential interface outcomes
- climate-responsive landscaping and built form
- operational management measures for noise, servicing and movement
- safe and legible access arrangements.
- demonstrated adaptability and circularity measures (for example adaptive reuse, modular fitout strategies, or end-of-life deconstruction planning) proportionate to project scale

5.4.4 Recommendation

The Institute does not support automatic yield uplift or concessions that are not clearly linked to design and amenity performance.

## 6. Design governance and assessment process

The Institute recommends that Council incorporate design governance measures to support consistency, quality and community confidence.

### 6.1 Early design review

For larger or more impactful proposals, particularly where incentives or departures from standard controls are sought, Council should consider an early-stage design review process (internal or independent).

### 6.2 Pre-lodgement consultation

Council should encourage structured pre-lodgement engagement involving relevant disciplines, including architecture, planning, landscape, traffic and acoustics, to reduce conflict and improve design outcomes.

### 6.3 Assessment guidance

Assessment officers should be supported with strategy-specific criteria and examples to ensure consistent application of policy intent.

### 6.4 Best-practice implementation guidance

The Institute recommends that Council provide implementation guidance that establishes a practical pathway between baseline compliance and recognised best practice, particularly for fitouts, circularity and site planning. This would support better outcomes without imposing formal certification requirements, while enabling future uplift over time.

### 6.5 Monitoring and review

Council should monitor implementation outcomes (for example, number and location of rooms delivered, design quality indicators, transport outcomes, and neighbourhood impacts) and undertake a formal review after an initial implementation period.

## 7. Community confidence and long-term outcomes

The Institute notes that the success of the strategy will depend on community confidence in the quality and appropriateness of resulting development outcomes.

The strategy is more likely to achieve enduring support where planning settings clearly demonstrate that Council is seeking to deliver:

- well-designed suburban accommodation
- improved streetscape and landscape outcomes
- local economic activation
- appropriate protection of neighbouring residential amenity
- legacy benefits beyond 2032.

Community confidence will also be strengthened where projects demonstrate authentic place-based outcomes, including opportunities for First Nations engagement and local procurement where appropriate. These approaches can improve place identity, cultural recognition and long-term community benefit beyond short-stay accommodation delivery alone.

A design-led and place-based approach will reduce the risk that the strategy is perceived as a short-term relaxation of standards.

## 8. Summary of recommendations

1. Proceed with the Suburban Pub Stays Strategy in principle, recognising the accommodation and legacy opportunity.
2. Implement the strategy through quality-led planning reform, with incentives linked to design and amenity outcomes.
3. Adopt a performance-based design framework addressing built form, amenity, public realm, landscape, sustainability and accessibility.
4. Publish a Suburban Pub Stays Design Guide (or equivalent implementation guideline).
5. Review car parking rates using a location-sensitive, evidence-based approach, including tiered rates and merit-based reductions.
6. Ensure parking concessions are linked to urban design outcomes and do not produce parking-dominant site planning.
7. Apply clear locational/suitability criteria rather than blanket incentives across all suburban pub sites.
8. Structure incentives as targeted and performance-based, not automatic yield uplift.
9. Require robust neighbour amenity protections, including acoustic, privacy, lighting and servicing controls.
10. Embed climate-responsive subtropical design and green infrastructure requirements as core policy expectations.
11. Embed adaptive reuse and circular economy principles in design criteria and incentive settings, including support for retrofit, modularity and future disassembly where appropriate.
12. Encourage place-based and culturally informed outcomes, including First Nations engagement approaches appropriate to project scale and context.
13. Include design governance measures, including early design review for significant proposals.
14. Monitor and review implementation outcomes to ensure both short-term accommodation delivery and long-term suburban value are achieved.

## 9. Closing statement

The Institute welcomes further engagement with Brisbane City Council on the development of the Suburban Pub Stays Strategy and any associated planning framework amendments.

This initiative presents an opportunity for Brisbane to respond to accommodation demand in a manner that also advances design quality, neighbourhood amenity and long-term suburban resilience. The Institute supports Council in pursuing this outcome and would welcome ongoing dialogue as the policy package is refined.

Sincerely,



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