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Brisbane City Council
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Via email: strategic.planning@brisbane.qld.gov.au

BCC More Homes Sooner - Car parking for multiple dwellings (Citywide amendment)

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1. Purpose of submission

The Australian Institute of Architects (the Institute) welcomes the opportunity to provide feedback on Brisbane City Council's proposed More Homes, Sooner - Car parking for multiple dwellings amendment package.

The Institute supports the strategic intent and overall direction of the amendment to revise minimum on-site car parking rates for multiple dwellings across Brisbane (outside the City core and City frame), and to introduce a Key Location parking framework linked to centres and frequent public transport access. Council states that the purpose of the amendment is to support more homes in the right places and improve housing supply and diversity in well-located areas near transport and services.

The Institute supports:

- reducing parking minimums where they currently act as a barrier to housing feasibility and diversity
- a location-based approach that better aligns parking requirements with transport accessibility
- retaining flexibility for developers to provide more parking where warranted (as rates remain minimums)
- a planning response that can improve design outcomes by reducing the dominance of parking structures in low and mid-rise housing projects.

The Institute also recognises Council's stated affordability rationale, including the indication in Council's fact sheet that a car parking space can add substantial cost to a unit outside the inner city.

However, the effectiveness and public acceptance of this reform will depend on how it is implemented and integrated with urban design, transport, kerbside management and neighbourhood amenity.

The Institute therefore recommends strengthening the package and implementation framework through:

1. Design-led parking outcomes (avoid car-dominated ground floors and streets)
2. Transport integration (walking, cycling, public transport and kerbside management)
3. Clear and consistent Key Location mapping and application
4. Visitor parking functionality and access design
5. Sustainable Travel Plan quality and accountability for Key Location developments
6. Monitoring and review of housing, parking and neighbourhood impacts after implementation.

The Institute's position is that car parking reform is an essential part of housing reform, but it should be delivered as part of a broader design and mobility strategy, not as a standalone numerical change.

2. About the Institute's interest in this amendment

The Institute represents architects in private practice, government, education and industry, and has a strong interest in planning and design settings that shape:

- housing supply and diversity
- building feasibility and project delivery
- neighbourhood character and public realm quality
- walkability, climate-responsive urban form and transport integration
- long-term liveability and accessibility.

Architects are directly involved in the design of the multiple dwelling typologies most affected by parking provisions, including townhouses, walk-up apartments and low to mid-rise apartment buildings. Car parking requirements have a major influence on:

- project feasibility
- dwelling mix
- building footprint and site cover
- landscaping outcomes
- ground plane activation and frontage quality
- construction cost and embodied carbon.

The Institute therefore provides this submission from a design, delivery and city-shaping perspective.

3. Overall position on the proposed amendment

The Institute supports the amendment in principle and considers it an appropriate and timely component of the broader More Homes, Sooner LMR review.

Council's proposed changes include:

- revised citywide minimum parking rates for multiple dwellings outside the City core and City frame
- introduction of a Key Location rate for sites in centres/mixed use zones or within a 400m walking distance of qualifying public transport/centres
- retention of visitor parking at 0.25 spaces per dwelling in the published rate table
- no changes to parking rates in the City core or City frame areas
- rounding down resident parking spaces (while visitor spaces continue to round up) in citywide calculations.

The Institute supports this direction because minimum parking requirements can materially affect housing feasibility and built form quality, especially in lower-rise infill projects where parking consumes a large proportion of the site or building envelope.

That said, parking reform can generate local concern if changes are not paired with visible improvements to streets, mobility options and design quality. The amendment should therefore be implemented with a strong focus on public confidence, functional performance and place outcomes.

4. Comments on key elements of the proposal

4.1 Location-based parking reform (Key Locations) – strongly supported

Council proposes a new Key Location parking rate for sites with better access to centres and frequent public transport, including land within principal/major/district centres or mixed use zones, and land within 400m walking distance of nominated transport access points, qualifying public transport stops, or those centres/zones.

The Institute strongly supports this structure because it:

- aligns parking demand assumptions more closely with transport accessibility
- supports housing supply in locations where reduced car dependence is more realistic
- avoids blunt, citywide parking reductions that disregard context
- creates a clearer policy logic for industry and the community.

Recommendations

1. Ensure Key Location mapping is clear, public-facing and easy to interrogate (including examples and edge-condition guidance).
2. Clarify how changes in public transport service frequency are treated over time (fixed mapped status vs dynamic criteria).
3. Use pedestrian catchment quality, not nominal distance alone, as an implementation consideration (safe crossings, barriers, steep grades, shade and footpath continuity).
4. Publish a concise Key Location methodology note to improve transparency and reduce dispute in assessment.

4.2 Proposed parking rates – supported, with monitoring

Council's published table shows the following proposed rates (outside City core and City frame):

- Citywide: 1 bed = 1; 2 bed = 1.5; 3 bed = 2; 4+ bed = 2.5; visitor = 0.25
- Key Location: 1 bed = 1; 2 bed = 1.2; 3 bed = 1.6; 4+ bed = 2.0; visitor = 0.25.

The Institute supports these changes as a pragmatic step, particularly:

- the reduction in 2-bedroom and 3-bedroom requirements in Key Locations
- the reduction in 2-bedroom requirements citywide
- retention of at least one space per dwelling, which may assist policy transition and market acceptance.

The Institute notes Council's position that every dwelling will still require at least one car parking space under the proposed changes.

Recommendations

1. Proceed with the proposed rates but commit to a formal post-implementation review using approvals and occupancy data.

2. Track whether the revised rates are genuinely improving feasibility for smaller and medium-scale projects (not only larger sites).
3. Monitor whether visitor parking at 0.25 remains functional in all contexts, particularly where on-street parking is constrained.

4.3 Parking as a design issue, not just a traffic issue – strengthen design expectations

From an architectural perspective, parking controls are inseparable from built form and streetscape outcomes. Excessive parking minimums often result in:

Parking rates also have direct sustainability implications: structured parking—particularly basements—can materially increase embodied carbon and construction cost, while consuming envelope and site area that could otherwise support deep planting, permeability and communal open space. The Institute encourages Council to explicitly align parking reform with decarbonisation objectives by reducing unnecessary parking construction, supporting active and public transport access, and ensuring designs remain future-ready for low-emission mobility (including practical EV-ready infrastructure where feasible and proportionate).

Council’s existing design guidance, including SC6.29A Subtropical building design planning scheme policy, provides relevant benchmarks for ground-plane quality, shade and outdoor comfort that should inform assessment where parking reform enables different built form outcomes.

- oversized podiums or basement-driven design outcomes
- reduced landscaping and deep planting
- garage-dominant frontages
- poorer ground-floor amenity and activation
- constrained dwelling layouts and reduced adaptability.

Reducing parking minimums can improve design flexibility and housing diversity, but only if the planning and assessment framework also prioritises quality outcomes.

The Institute recommends Council explicitly reinforce design expectations in the related codes and guidance so reduced parking does not simply produce smaller projects with unresolved operational impacts, but instead supports better buildings and streets.

Recommendations

1. Prioritise landscaped front setbacks, active entries and pedestrian legibility over parking-dominated frontages.
2. Discourage solutions where vehicle access and manoeuvring consume disproportionate street frontage on small or narrow sites.
3. Encourage integrated design approaches that balance parking, waste, bicycle parking, services and landscaping at the ground plane.
4. Align this amendment with the LMR design package so parking reform and built form reform operate as a single, design-led system.

4.4 Sustainable Travel Plans for Key Location developments – supported and should be made meaningful

The Schedule of Amendments includes a note that a Sustainable Travel Plan is to be submitted for all multiple dwellings in a Key Location, with consideration of public transport, local services, on-street parking controls, active travel (including bicycle parking), and on-site car share.

The Institute strongly supports this requirement. This is a valuable mechanism to ensure reduced parking rates are supported by a credible mobility strategy.

However, the benefit of this provision will depend on the quality and consistency of the plan content and how it is assessed.

Recommendations

1. Publish a standard template or guidance note for Sustainable Travel Plans, including minimum content and expected evidence.
2. Require plans to address:
 - pedestrian access quality to nearby transport stops/services
 - accessible pedestrian routes (step-free where practicable), crossing safety, shade and wayfinding for people of all ages and abilities
 - secure and convenient bicycle parking (resident and visitor)
 - end-of-trip support where relevant
 - car share feasibility and management
 - wayfinding and mobility information for residents
 - inclusive access within sites, including accessible parking provision, gradients, lighting, and safe paths between parking, lifts and entries
 - on-street parking context and likely behavioural impacts.
3. Consider a proportionate approach (short-form vs detailed plan) based on project scale.
4. Review plan effectiveness after implementation to avoid a purely procedural requirement.

4.5 Visitor parking and tandem parking provisions – practical but should be carefully managed

The Schedule of Amendments notes that:

- parking may be provided in tandem where 2 spaces are provided for 1 dwelling
- at least 50% of visitor parking is to be provided in communal areas and not in tandem with resident parking
- car share spaces (where provided) may be included in the minimum requirement.

The Institute generally supports these provisions as practical mechanisms to improve design flexibility, particularly on constrained sites. However, these arrangements can create usability and management issues if poorly resolved.

Recommendations

1. Retain tandem parking flexibility but ensure it is used in ways that are functionally realistic for household types and dwelling sizes.
2. Maintain strong expectations for clearly accessible visitor parking and simple navigation.
3. Clarify operational expectations for car share spaces if counted toward minimums (location, access and ongoing availability).
4. Ensure parking layouts do not compromise bin movement, accessible access, or safe pedestrian routes within the site.

4.6 Affordability rationale – support the direction

Council's fact sheet links parking reform to housing affordability and notes that a car parking space can add significant cost (up to \$82,000 outside the inner city).

The Institute supports the broad proposition that unnecessary parking minimums can increase development costs and constrain housing types. At the same time, the relationship between reduced parking requirements and end-user price outcomes is complex and may vary by market segment and location.

Recommendations

1. Continue to frame the reform as improving feasibility, diversity and supply conditions, with affordability benefits likely but variable.
2. Commit to collecting evidence on:
 - project approvals and commencements
 - dwelling mix changes
 - parking provision delivered vs minimum required
 - development patterns in Key Locations vs non-Key Locations.
3. Use this evidence to refine settings and strengthen future advocacy for integrated housing and transport reform.

5. Additional recommendations to strengthen the amendment package

5.1 Integrate parking reform with kerbside and local mobility planning

Community concern about parking reform often centres on spillover parking, not the on-site rates themselves.

Recommendations

- Coordinate implementation with kerbside management strategies in areas likely to experience increased infill
- Prioritise safe walking links to public transport
- Improve bicycle parking standards and usability
- Align with local active transport and public transport upgrades where feasible.

This will help ensure the amendment is understood as a mobility transition strategy, not simply a parking reduction.

5.2 Provide public-facing examples of good outcomes

To build confidence, Council should publish examples of what reduced-parking multiple dwellings can look like in practice.

Recommendations

- A short, illustrated guide showing:
 - better landscaped frontages
 - improved building entries
 - less car-dominant ground planes
 - integrated bicycle parking and servicing
 - practical visitor parking layouts.

This would be particularly valuable for neighbourhoods experiencing change under the LMR review.

5.3 Monitoring and formal review (12–24 months)

The Institute recommends Council commit to a post-implementation review of the amendment.

Suggested metrics

- number and type of multiple dwelling approvals
- parking supplied vs minimum requirement
- distribution of approvals in Key Locations vs non-Key Locations
- approval timeframes and common assessment issues
- complaints/compliance issues relating to on-site and on-street parking
- evidence of design quality improvements at ground plane/frontage level

- uptake and quality of Sustainable Travel Plans.

A review window of 12–24 months would allow Council to identify unintended consequences and adjust the settings if needed.

6. Draft Statement (short form)

The Australian Institute of Architects supports the strategic intent of Brisbane City Council's proposed More Homes, Sooner – Car parking for multiple dwellings amendment. The Institute supports a location-based approach to minimum parking rates, including the introduction of Key Location provisions linked to centres and frequent public transport, as a practical measure to improve housing feasibility and diversity in well-located areas.

The Institute recommends that Council strengthen implementation through clear Key Location mapping, robust Sustainable Travel Plan guidance, design-focused assessment of ground plane and frontage outcomes, and a formal post-implementation review to monitor housing, mobility and neighbourhood impacts.

7. Conclusion

The Institute supports this amendment as an important and necessary component of Brisbane's broader housing reform response.

Car parking provisions materially shape the cost, form and quality of multiple dwellings. Updating those provisions to reflect location and transport access is a sensible step. The opportunity now is to ensure these reforms are delivered through a design-led, place-based implementation approach that improves housing outcomes while maintaining liveability and public confidence.

Sincerely,



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