

Friday, 20 March 2026

Brisbane City Council
Brisbane Square, 266 George Street
Brisbane Qld 4000
Via email: strategic.planning@brisbane.qld.gov.au

BCC More Homes Sooner - Low Medium Density Residential Design

Date	20 March 2026
Prepared by	Australian Institute of Architects, Queensland Chapter

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 – Low-medium density residential design amendment package.

The Institute supports the strategic intent of the amendment to increase housing supply and diversity in well-located areas, while seeking to maintain Brisbane's valued subtropical character and neighbourhood identity. Council's proposal to refine built form, lot size and related design provisions in the Low-medium density residential (LMR) zone is a constructive and timely response to Brisbane's growth and housing pressures.

Council's explanatory material identifies the need for substantial additional homes by 2046 and positions the LMR zone as an important part of that response. In particular, the Institute supports:

- a stronger relationship between housing intensity and access to centres and frequent public transport through the Key Locations approach
- an expanded range of housing typologies in the LMR zone
- increased opportunity for 3–4 storey multiple dwellings in suitable locations
- refined pathways for small lot housing and duplexes outside Key Locations
- planning reform that improves feasibility while retaining clear expectations for design outcomes.

However, the success of this amendment will depend not only on where additional density is permitted, but how it is designed and delivered. The Institute therefore recommends strengthening the amendment and implementation framework in the following areas:

- Design quality and climate responsiveness (including passive design, shading, ventilation and heat mitigation)
- Landscape and urban tree outcomes, including deep planting and canopy retention/replacement
- Neighbourhood interface controls, especially transitions to lower-scale and detached housing contexts
- Accessible and adaptable housing outcomes to support ageing in place and inclusion
- Public realm and streetscape quality, including footpaths, street trees and on-street parking management

- Built form clarity and certainty, including guidance for application and assessment
- Design review and architectural input for more complex LMR development typologies
- Monitoring and post-implementation review to ensure the amendment is delivering intended outcomes.

The Institute's position is that Brisbane can and should accommodate more homes in established areas, but that this must occur through design-led density, not simply uplift in development yield.

2. About the Institute's interest in this amendment

The Institute represents architects across practice, government, education and industry, and has a strong interest in planning settings that influence:

- housing supply and housing diversity
- neighbourhood character and public realm outcomes
- climate-responsive design
- liveability, walkability and urban resilience
- long-term quality, performance and adaptability of the built environment.

Architects are directly involved in the design and delivery of the housing forms most affected by this amendment, including small lot housing, duplexes, townhouses and apartment buildings. The Institute therefore provides this submission from the perspective of practical deliverability, design quality and city-shaping outcomes.

3. Overall position on the proposed amendment

The Institute supports the amendment in principle and considers it to be a positive step toward:

- better aligning planning controls with Brisbane's growth and housing needs
- directing greater intensity to locations with better access to transport and centres
- broadening housing choice in established suburbs
- improving flexibility in the LMR zone while retaining a design framework.

Council's proposed simplification of existing LMR precincts into a new 3 or 4 storey mix zone precinct, together with the distinction between Key Locations and non-Key Location areas, is a useful planning structure that should improve legibility for the community and industry if implemented clearly.

The Institute also recognises the intent to support:

- more apartments in Key Locations
- more small lot housing outside Key Locations
- revised lot sizes and built form parameters
- car parking reform (through the related package) where areas have strong access to transport and services.

This is an appropriate strategic direction. The key issue now is ensuring the amendment embeds the right quality safeguards and implementation tools.

4. Comments on key elements of the proposal

Council already has strong, relevant design guidance that should be explicitly referenced in implementation and assessment, including Council's Low-to-medium density residential design guide (neighbourhood and site scale) and City Plan's SC6.29A Subtropical building design planning scheme policy. While SC6.29A is directed to higher intensity contexts, its subtropical design principles (shade, ventilation, outdoor comfort and ground-plane quality) are directly applicable to low- and mid-rise outcomes in the LMR zone.

4.1 Key Locations framework — supported, with implementation refinements

Council proposes a Key Locations framework tied to centres, mixed use zones, and land within walking distance of major public transport interchanges and frequent public transport stops. The explanatory guide indicates a 400m walking distance threshold and frequency criteria (20-minute weekday and 30-minute weekend services).

The Institute supports this approach because it:

- links density to access and services rather than applying broad-brush uplift
- helps reduce transport disadvantage
- supports walkability and local business activity
- provides a stronger planning rationale for increased height and dwelling intensity.

Recommendations

- Ensure Key Location mapping is transparent and easy to interpret in City Plan online and downloadable mapping (including clear methodology notes and examples).
- Clarify treatment of service frequency changes over time (e.g. whether Key Location status is fixed to mapping or dynamically linked to service levels).
- Provide guidance for edge conditions where sites straddle Key Location boundaries, to avoid inconsistent outcomes and disputes.
- Prioritise pedestrian catchment quality, not only nominal distance (e.g. safe crossings, topography, barriers, shade and footpath continuity).

4.2 Increased building height for multiple dwellings in Key Locations — supported in principle

Council proposes increased building heights for multiple dwellings (apartments and townhouses) in the LMR zone up to 4 storeys / 14m in Key Locations on sites with a minimum lot size of 800m², while 3-storey multiple dwellings remain on smaller minimum lots (e.g. 600m²).

The Institute supports the introduction of 4-storey multiple dwellings in suitable LMR locations, noting this can significantly improve feasibility and housing yield on well-located sites without immediately moving to higher-rise outcomes.

However, 4-storey outcomes in suburban contexts require strong controls on:

- building bulk and articulation
- setbacks and separation
- privacy and overlooking
- deep planting and canopy
- ground-level interface and frontage design
- top-floor recession/visual impact (where appropriate)
- service areas, waste, and loading
- car park dominance and driveway impacts.

Recommendations

Strengthen qualitative design outcomes and assessment benchmarks for 4-storey buildings, with explicit emphasis on subtropical design performance.

Require demonstration of:

- cross ventilation opportunities
- effective solar shading
- usable private open space/balconies
- façade articulation and material durability
- landscaping integrated with built form (not residual planting).
- Differentiate expectations for corner sites, through sites and narrow/deep sites, as these produce very different massing outcomes.

Consider additional interface provisions for 4-storey development adjoining lower-scale residential lots to manage transition and amenity impacts.

4.3 Small lot housing and duplex provisions outside Key Locations – supported, with design safeguards

Council proposes refinements to support small lot houses and duplexes outside Key Locations, including:

- up to 3 storeys / 11.5m
- minimum lot size of 120m² (where design and built form criteria are met)
- minimum lot size of 400m² for dual occupancies
- site cover and impervious area controls
- narrower driveway crossover allowances
- setback adjustments including built-to-boundary walls.

The Institute supports this to expand the “missing middle” and entry-level housing forms, particularly in areas not best suited to apartment outcomes.

The inclusion of impervious area controls and space for landscaping/stormwater response is positive and aligns with liveability and urban heat considerations. Council’s proposal notes the role of landscaping and impervious limits in stormwater management and reducing urban heat island effects.

The explanatory guide’s Development Footprint Plan (DFP) concept for lots below 180m² is also a practical mechanism to maintain design quality while streamlining future house approvals.

Recommendations

Retain and strengthen landscape and permeability requirements, ensuring small lot housing still delivers meaningful greenery and cooling outcomes.

Ensure DFP requirements include clear standards for:

- tree planting opportunity at street frontage
- bin storage without streetscape clutter
- rainwater/stormwater integration
- private open space usability
- natural ventilation and daylight access
- step-free entries and accessible internal circulation (including where ground levels vary)
- clear, safe pedestrian access to the street that is not compromised by driveways or services

- garage/driveway minimisation.

Develop a public design guide / exemplar package for small lot and duplex outcomes to improve consistency and community confidence.

Avoid settings that unintentionally encourage poor-quality “max envelope” outcomes with minimal amenity.

4.4 LMR precinct simplification — supported, subject to clarity in code drafting

Council proposes combining existing LMR precincts into a new 3 or 4 storey mix zone precinct to simplify the structure and provide greater flexibility.

The Institute supports simplification where it:

- improves comprehension for applicants and residents
- reduces unnecessary code complexity
- supports consistent assessment outcomes.

Recommendations

- Provide plain-English drafting notes and worked examples showing how existing provisions translate into the new structure.
- Publish a concise “what changes for my site?” guide (particularly for homeowners, small developers and neighbourhood groups).
- Ensure code drafting avoids ambiguity between “acceptable” and “performance” pathways where design quality is at stake.

4.5 Low density zone subdivision expansion near shopping centres — cautiously supported

Council proposes expanding the distance within which 300m² lots can be created in the low density residential zone near shopping centres from 200m to 300m walking distance.

The Institute recognises the rationale for this change as part of a broader housing diversity strategy, particularly where services are accessible on foot.

However, this provision should be supported by strong design expectations to avoid poor streetscape outcomes and cumulative loss of landscape character.

Recommendations

- Apply robust frontage, landscaping and built form controls to preserve neighbourhood amenity and climate performance.
- Monitor cumulative impacts in suburbs experiencing significant lot fragmentation.
- Align subdivision outcomes with street tree, stormwater and heat mitigation objectives.

4.6 Interface with parking reform – support strategic alignment, but prioritise design outcomes

Council identifies this amendment as one of two packages under the broader LMR review, with a related package concerning car parking for multiple dwellings. The explanatory guide also outlines proposed parking rate changes by dwelling size, including reduced rates in Key Locations.

The Institute supports reviewing parking rates in locations with good transport access, as excessive parking requirements can undermine feasibility, reduce housing yield, and compromise design quality.

At the same time, parking reform should be accompanied by:

- high-quality on-street parking and kerbside management
- safe walking and cycling infrastructure
- practical visitor parking expectations
- design controls that prevent podium/garage-dominated streets.

Recommendations

- Ensure parking changes are implemented alongside a place-based transport and streets management response.
- Prioritise active frontages and landscaped setbacks over car-dominant ground floors.
- Monitor post-implementation parking demand and neighbourhood impacts.

5. Additional recommendations to strengthen the amendment

5.1 Embed subtropical and climate-responsive design more explicitly

Council's materials reference Brisbane's subtropical climate and the need for housing to respond to it. The Institute strongly supports this and recommends that this intent be expressed in clearer, assessable planning outcomes.

Recommendations

- Explicit outcomes for passive solar control and shading
- Cross ventilation and daylight access benchmarks
- Heat island mitigation through canopy and permeable surfaces
- Rooftop design that supports solar PV and heat reduction
- Durable, low-maintenance materials suitable for subtropical conditions.

5.2 Strengthen trees, landscaping and deep planting outcomes

As density increases, tree canopy and landscape quality become more important, not less. The Institute recommends that landscaping requirements be treated as a core infrastructure outcome for liveability, stormwater management and urban cooling.

Council's explanatory material illustrates built form envelopes that, if applied as a 'maximum' default, risk producing large, centred building masses with narrow remnant setbacks and residual spaces that are difficult to use, difficult to maintain, and unlikely to support meaningful planting. To avoid 'paved over' outcomes and deliver cool, shaded micro-climates, Council should encourage landscape-led site planning: prioritising retention of existing mature trees where practicable, securing opportunities for new large-canopy trees through deep planting areas, and allowing objective trade-offs (for example, limited setback flexibility) where this demonstrably improves long-term vegetation, permeability and neighbour amenity.

The proposed Development Footprint Plan (DFP) approach is a strong start for small lots and should be extended – proportionately – to sites that already support significant vegetation so that development envelopes explicitly protect and enhance canopy outcomes over time.

Recommendations

- Minimum deep planting dimensions (not just total landscaped area)
- Tree planting requirements proportionate to site size and building type
- Protection/replacement expectations where mature trees are removed
- Front setback landscape outcomes that contribute to streetscape character.

5.3 Improve accessible and adaptable housing outcomes

Housing diversity should also include diversity of age, mobility and household needs.

Recommendations

- Encourage or require a proportion of homes designed to adaptable/liveable standards, particularly in larger multiple dwellings
- Improve step-free access expectations in common entries and ground-floor interfaces
- Support layouts suitable for ageing in place and multigenerational living.

5.4 Introduce a design quality pathway / design review for larger or more sensitive proposals

The Institute recommends Council consider a targeted design quality mechanism (e.g. design review or mandatory architectural design statement) for:

- 4-storey multiple dwellings in LMR zones
- prominent corner sites
- sensitive interfaces
- larger assemblies in established neighbourhoods.

This would improve outcomes and help build community confidence in planning uplift.

5.5 Commit to implementation monitoring and a formal review

The amendment should be evaluated against clear objectives after implementation.

Recommended metrics

- number and type of dwellings approved (small lot, duplex, townhouse, apartment)
- distribution inside vs outside Key Locations
- average approval time
- proportion of projects using performance pathways
- tree canopy/landscaping outcomes
- parking supply and transport outcomes (in Key Locations)
- design quality and neighbourhood interface issues raised through compliance or appeals.
- A review at 12–24 months would allow Council to refine provisions where unintended outcomes emerge.

6. Draft Statement (short form)

If Council requires a concise formal statement, the Institute's position may be summarised as follows:

The Australian Institute of Architects supports the strategic intent of Brisbane City Council's proposed More Homes, Sooner – Low-medium density residential design amendment. The Institute supports increasing housing diversity and supply in well-located areas, particularly through the Key Locations framework and expanded opportunities for well-designed low- to mid-rise housing in the LMR zone.

The Institute recommends strengthening the amendment and implementation guidance to ensure design-led density outcomes, including clearer requirements for subtropical climate-responsive design, landscaping and tree canopy, neighbourhood interface transitions, accessibility and adaptability, and public realm quality. The Institute also recommends a post-implementation monitoring and review process to confirm the amendment is delivering housing supply without compromising long-term liveability and neighbourhood quality.



7. Conclusion

The Institute supports Council's direction and acknowledges the importance of timely planning reform to respond to housing need in Brisbane. The proposed amendment has the potential to make a meaningful contribution to housing supply and diversity, particularly if paired with strong design quality controls and practical implementation support.

Brisbane's growth challenge is not only about the number of homes delivered, but the kind of city those homes create. The Institute encourages Council to use this amendment to demonstrate that housing acceleration and high-quality urban design can and should proceed together.

Sincerely,

A handwritten signature in black ink, appearing to read 'Peter Gardiner'.

Peter Gardiner
Queensland Chapter President
Australian Institute of Architects

A handwritten signature in black ink, appearing to read 'Kim Richards'.

Kim Richards
Executive Leader, Queensland
Australian Institute of Architects