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To Whom It May Concern

MORE HOMES SOONER: BRISBANE CITY COUNCIL REVIEW OF THE LOW-MEDIUM RESIDENTIAL ZONE

This submission outlines Q Shelter's input to Brisbane City Council's (BCC) review of the Low-Medium Residential (LMR) Zone, as announced by the Lord Mayor recently.

Background

The current housing context poses significant challenges due to an insufficient supply to meet existing demands. Furthermore, Queensland's population is projected to grow exponentially until 2046, adding even more pressure on demand. Consequently, access to affordable housing options becomes increasingly difficult for individuals with low to moderate incomes, and progressively, for many other demographic groups, which escalates the rates of people experiencing or at risk of homelessness.

In terms of housing supply and housing diversity, the SEQ Regional Plan 2023 update ('SEQ Regional Plan') proposes that SEQ will need to accommodate an additional 2,160,700 people living in the region by 2046, requiring 863,800 more dwellings. For the Brisbane LGA, that equates to 463,400 more people requiring 210,800 additional dwellings.

The SEQ Regional Plan, which we support, also proposes strategies for housing typology, factoring in the needs of certain income groups to be in inner-city urban areas through a mix of housing types and tenures. The consolidation/expansion dwelling growth ratio for the region shifts from a minimum of 60/40 towards a ratio of 70/30 over time. The plan prioritises density in its growth projections, including in the Brisbane LGA, where a large portion of future population growth will need to be accommodated by high-rise attached (9 storeys and above), mid-rise attached (4-8 storeys), and low-rise attached (1-3 storeys) properties.

General principles

We welcome Council's recent reforms, including the Sustainable Growth Strategy, Inner City Strategy, Housing Supply Action Plan, Housing Supply Incentive Policy, Build-to-Rent Incentive Policy and now the LMR zone review. We know that when many of these measures work well together, they have the ability to deliver well-located, affordable, and diverse housing options.

Q Shelter believes that a primary objective of such reforms should be to achieve a 'healthy housing system' overall, where supply adequately meets demand, and housing diversity and choice are accessible to all income groups. We want to deliver more of the *'homes we need, where they count.'*

We know that a healthy housing system gives people access to safe, secure and suitable homes when and where they need them. It delivers diverse housing options and supply across the full housing continuum, and supports walkable, well-located and inclusive communities, boosts productivity, and long-term sustainability. It is achieved through strong leadership and deep collaboration across a thriving delivery ecosystem of government, industry and community, delivering quality, future-ready and diverse homes at scale.

Housing Diversity Framework

Our submission offers constructive and well-thought-out solutions and recommendations that are underpinned by the following key principles that form part of a wider Housing Diversity Framework that we align to.

Diversity of form	Diversity of tenure	Diversity of price	Diversity of location	Diversity of financing and ownership, and operating models
From detached homes and duplexes to townhouses, apartments, granny flats, co-living models, and tiny homes. Includes a mix of housing sizes (from micro-units to multi-bedroom homes)	Including home ownership, private rental, social housing, shared equity, community-managed housing, build-to-rent, and cooperative housing.	Homes offered across a full spectrum of price points, from deeply subsidised social and affordable housing to market housing at varying levels of cost.	Homes located close to jobs, schools, transport, services, parks, and shops. Well-located housing reduces travel costs and emissions and improves access to opportunity and quality of life.	Including new and emerging forms such as public-private partnerships, cooperatives, co-housing, and build-to-rent initiatives that expand supply and tenure choices.

Current roadblocks

In order to provide a set of solutions and proposals for the Council to consider, we have sought to articulate some of the current roadblocks that need to be overcome to realise more benefit from the LMR zone. Some of these include:

- Limiting housing output. Despite 14% of Brisbane's land currently being zoned for LMR, we understand that only 445 homes were built in 2023, raising concerns about the feasibility of developing in these zones as currently prescribed
- Prohibitive rules around building height, minimum lot sizes, and car parking requirements, which are seen as barriers to development
- Limited housing diversity and choice – such as duplexes, triplexes, and terraces
- Lack of affordable housing near key amenities such as schools and public transport
- Complexity in approvals and multiple levels of assessment

Proposed solutions

Overall, we suggest a variety of policy and planning reforms to enhance value from the LMR zone, and we have also proposed some changes that may not be “in scope” of this review but could provide greater housing affordability and diversity benefits if pursued alongside.

1. Changes to LMR zone provisions

Minimum lot sizes:

- Reduced to 120m², including reducing the minimum lot size for the rear lot
- Removing the impact assessment trigger for minimum lot sizes.

Building height:

- Enable a building height of three storeys across all precincts as code assessable
- Enable a building height of 4-5 storeys within walking distance of high-frequency public transport and higher-order centres.

Traditional building character

- Review the existing provision that appropriately balances housing supply and charter consideration, with a priority placed on housing diversity opportunities given the scale of need.

Multiple dwelling code

- Apply lower car parking limits within 400 metres of high-frequency public transport

2. Expansion of LMR zone

- Identify new areas and locations in close proximity to major public transportation centres that should be rezoned at least LMR
- If there are sites already zoned LMR, and they are in really well-located areas, they should be upzoned to Medium-Density Residential.

3. Reforms to the Low-Density Residential zone

- These zones comprise 80% of Brisbane residential land but are predominantly detached homes. BCC should consider expanding the scope of the LMR review to consider further housing density in these zones, at a 'gentle density scale'

4. Community Facilities Zone

- Following amendments to the Planning Regulations in December 2024, we are calling on all local councils across Queensland, including BCC, to enable residential development in this zone, where providing an affordable housing component is code accessible.

5. Alignment of planning reforms, financial incentives, and design

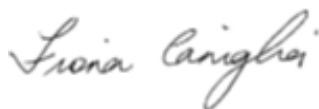
- Incentivise development proposals promoting 'missing middle' housing typology in the LMR zone, by reducing infrastructure charges and application fees for these projects
- To attract additional state and national investment opportunities, reduce infrastructure charges and application fees by 100% for projects that include 100% social and affordable housing, delivered by or in partnership with Community Housing Providers (CHPs)
- Consider introducing standardised building designs for 'missing middle' housing typologies that meet planning codes and provide a further fast-track approval.

Essentially, our submission seeks to provide solutions that deliver the *'homes we need, where they count.'* We want to accelerate the development of well-located, high-quality, affordable housing by leveraging every infill opportunity, and BCC's LMR Review presents a significant opportunity to achieve this goal.

Further contact

We appreciate the opportunity to provide input to the review process. For further questions or contact, please liaise with our General Manager, Policy & Strategic Engagement, Jackson Hills at Jackson.Hills@qshelter.asn.au, in the first instance.

Yours sincerely



Fiona Caniglia
Chief Executive Officer