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Strategic Planning (More Homes, Sooner)
City Planning and Design
Brisbane City Council
GPO Box 1434
Brisbane, QLD 4001
Via email strategicplanninghousing@brisbane.qld.gov.au

To Whom It May Concern,

Response to Proposed citywide amendment – More Homes, Sooner – Low-medium density

This submission outlines Q Shelter's response to Brisbane City Council's (BCC) proposed citywide amendment to land in the Low-Medium Density Residential (LMR) zone and the low-density residential zone.

Background

Brisbane and Queensland more broadly are experiencing acute housing pressures, driven by a shortage of homes relative to current demand. These pressures are expected to intensify as Queensland's population continues to grow strongly through to 2046. As demand outpaces supply, affordable housing options are becoming increasingly out of reach for people on low and moderate incomes, with housing stress now affecting a widening range of households and contributing to rising homelessness risk.

The scale of this challenge is clearly articulated in the Southeast Queensland Regional Plan 2023 update (the SEQ Regional Plan). It forecasts that the region will need to accommodate an additional 2.16 million residents by 2046, requiring approximately 863,800 new dwellings. Within the Brisbane local government area alone, this translates to population growth of around 463,400 people and the need for a further 210,800 homes.

The current SEQ Regional Plan also sets out a clear direction for how this growth should be delivered. It emphasises a broader mix of housing forms and tenures, particularly in inner-urban areas, to ensure different income groups can access well-located housing. Over time, the regional plan shifts the balance of growth toward greater consolidation, moving from a 60/40 split between consolidation and expansion to 70/30. This approach places a strong emphasis on increased residential density, with much of Brisbane's future growth expected to be accommodated through attached housing typologies, including low-rise (1–3 storeys), mid-rise (4–8 storeys), and high-rise developments (9 storeys and above).

Previous submission

Q Shelter welcomes Brisbane City Council's recent housing and planning 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 proposed changes to the LMR zone. We know that when many of these measures work together, they can 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.'* Our previous LRM submission, available below (see [Appendix](#)), outlined a full package of recommendations based on industry feedback and the evidence we have collected to support these outcomes.

Response to the Proposed citywide amendment

Overall, we strongly support BCC's approach to improve the capacity of the zone to deliver greater supply, and more diverse typologies of houses across both the LMR and LR zones.

In drafting the amendment, BCC has clearly accepted the case for:

- ✓ Increasing housing yield in well-located LMR areas
- ✓ Enabling smaller lot housing products
- ✓ Allowing greater height and density near transport and opportunity centres
- ✓ Reducing car parking requirements to support project feasibility.

However, the proposed changes remain conservative relative to the scale of reform originally advocated for by Q Shelter, and many other industry bodies, particularly in relation to:

- Height limits
- Citywide applicability
- Expansion of LMR zoning, and
- Stronger affordability and delivery incentives.

Q Shelter recommendations supported by the proposed amendment

BCC's proposal reflects several core elements of Q Shelter's advocacy in these areas, including:

a. *Smaller lot housing*

- Introduction of 120m² minimum lot sizes aligns directly with Q Shelter's call to unlock smaller, more attainable housing products
- The requirement for a Development Footprint Plan supports certainty and reduces future approval risk.

b. *Increased density in well-located areas*

- Recognition of Key Locations (within 400m of frequent public transport or centres) reflects Q Shelter's emphasis on locating density close to services
- The introduction of the Key Location definition assists in expanding upon the previous uplift provision for land within 400m of railway or busway stations, as an acknowledgement of the various locational attributes that contribute to residential amenity and development suitability. This includes frequent bus stops/stations, ferry terminals and higher order centres
- Allowing 4-storey multiple dwellings in these locations represents a step toward transit-oriented density, supporting more efficient use of well-located land and laying foundations for more comprehensive Transit-Oriented Development (TOD) over time.

c. *Parking reforms*

- Reduced on-site parking rates, particularly in Key Locations, align with Q Shelter's recommendation to remove feasibility barriers linked to outdated car ownership assumptions.

Q Shelter recommendations not included

Despite positive steps, several key recommendations are not reflected in the proposed amendment:

1. *Height and Scale*

- Q Shelter recommended 4–5 storeys within walking distance of high-frequency transport
- BCC limits this to 4 storeys only in a key location, where on relatively large sites ($\geq 800\text{m}^2$)
- Q Shelter notes that lot size is not a prerequisite to achieving high-quality design outcomes, and that this threshold may reduce the number of sites capable of achieving additional supply, due to the complex land assembly required to turn under-utilised land into supply.

2. *Citywide applicability*

- We support the additional uplift provided by Council in Key locations of the LMR zone, including increased building heights of up to 4 storeys and reduced car parking rates
- We note that the effect of the reforms is far less in LMR zoned land located outside of key locations, which comprise a significant extent of the zone
- We encourage Council to provide additional planning incentives for development across all LMR-zoned land to increase its citywide impact.

3. *Expansion of LMR and upzoning*

- We encourage Council to introduce re-zoning into the scope of the amendment, including:
 - Upzoning of Low density residential zoned land that meets the ‘Key location’ definition to Low-medium density residential; and
 - Upzoning of low-medium density residential zoned land to Medium density residential zoned land, where adjacent to rail stations or higher-order centres
- Without further expansion of land supply within the Low-medium density residential zone, the capacity to turn zoned land into housing supply and meet Brisbane’s low-rise attached housing targets is significantly constrained.

4. *Low density residential zone*

- We note that Council have increased the code assessable catchment for 300m² lots in the Low-density residential zone, from within 200m walking distance of a centre, to 300m
- Whilst we support the efforts to improve housing diversity in the low-density residential zone, it is considered that the additional supply delivered from this expansion may be limited
- We encourage Council to expand this catchment to 400m or even 500m to reflect the walking distance threshold adopted for the ‘Key location’ definition, and to increase the number of viable sites to deliver well-located and incremental housing supply uplift.

5. *Affordability and delivery mechanisms*

- There are no specific incentives included for:
 - Social and affordable housing
 - Community Housing Provider–led projects
 - Build-to-Rent or alternative tenure models.

- As a result, planning reform is not clearly linked to affordability outcomes. Whilst this type of complementary policy could be delivered through other means, such as infrastructure charge relief, we believe it could have been helpful to include targeted measures in the changes to the zone
- This may include a code assessable building height of 4 storeys in all instances in the zone, where providing more than 20% of dwellings as affordable housing, delivered by or in partnership with Community Housing Providers (CHPs).

6. *Process and assessment reform*

- We appreciate that Council have increased the extent of land which can achieve an uplift of building height through the use of the Key location definition as a level of assessment trigger. This is an improvement upon the previous trigger for sites “within 400m walking distance of a railway or busway station”
- Notwithstanding, we note that in some instances, existing design, traditional building character and neighbourhood plan provisions may constrain or supersede the effect of the proposed amendments
- The challenging interaction between traditional building character controls and additional housing supply remains a key barrier identified in Q Shelter’s original submission.

Key issues for BCC to address in the final amendment

For the LMR amendment to better align with housing needs and demand, Q Shelter believes that BCC should further consider:

- 1. Extending 4-storey provisions to more LMR areas, particularly along high-frequency transport corridors**
- 2. Revisiting lot size thresholds for 4-storey developments to improve feasibility and zoned capacity**
 - a. For example, reduce minimum lot size and frontage requirements for 4 storey development in LMR areas within walkable catchments of activity centres, and extend this approach to other high access LMR locations where parking and servicing impacts can be managed**
- 3. Linking planning reform with affordability outcomes, including incentives for delivering social and affordable housing through the involvement of CHPs**
- 4. Reducing assessment complexity, particularly for code-compliant developments**
- 5. Clarifying interaction with traditional building character controls and neighbourhood plans that may impose specific height limits or character controls that supersede the zone**
- 6. Overall, adopt a performance-based approach to planning where the objective and outcome of housing affordability and diversity can be applied in the assessment process**
- 7. A monitoring program to assess the delivery of homes under these provisions as a basis for understanding and mitigating barriers as they emerge**
- 8. A community education strategy to engage citizens and build community capacity to understand housing needs and solutions.**

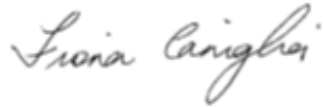
Q Shelter welcomes BCC’s proposed amendments to the Low–Medium Density Residential Zone as an important step toward unlocking additional housing supply in well-located areas. We support the introduction of smaller lot sizes, reduced car parking requirements, and increased building heights in proximity to public transport and centres.

However, given the scale of housing need facing Brisbane, now and in the future, Q Shelter considers that the proposed changes could and should go even further.

Further contact

We appreciate the opportunity to provide ongoing input on the LMR review process. For further questions or contact, please liaise with our Policy & Strategic Engagement Lead, Maya Glassman at Maya.Glassman@QShelter.asn.au, in the first instance.

Yours sincerely

A handwritten signature in black ink that reads 'Fiona Caniglia'.

Fiona Caniglia
Chief Executive Officer

Appendix

1. [Original Q Shelter Submission](#) to More Homes Sooner, BCC Review of LMR Zone