



Dedicated to a better Brisbane

16 September 2026

Ms Danielle Wood
Chair, Productivity Commission
housing.supply@pc.gov.au

Dear Ms Wood

Australian Productivity Commission *Housing Supply Regulation Interim Report*

Thank you for the opportunity to provide feedback on the Australian Productivity Commission's (the Commission) interim report on housing supply regulation. Brisbane City Council (Council) supports the Commission's efforts to identify unnecessary impediments to the delivery of new homes across Australia.

Whilst Council recognises that housing is delivered by the private sector and state governments, it continues to meet the land supply capacity benchmarks set by the Queensland Government each year and updates *Brisbane City Plan 2014* (City Plan) to ensure its requirements are clear, contemporary and as efficient as possible. Council has also been recognised as having one of the fastest development assessment processes of all capital cities, sitting within an integrated, well-coordinated State development assessment framework guided by an up to date South East Queensland Regional Plan. It does this whilst managing urban services, local infrastructure, transport and environment, to meet the needs of Brisbane's communities, industries and businesses.

The Commission may be aware that in recent years Council has undertaken further reforms to respond to increased housing demand. This includes expanding the area where there is no minimum car parking requirement for new development, reducing residential car parking requirements for multiple dwellings across the city, providing infrastructure charges relief for new residential development, and offering incentives for build to rent and retirement housing.

Council has also recently adopted changes to Brisbane's Low-medium density residential zone, including introducing a new minimum 120 sqm lot, allowing duplexes to be 'self-assessable', lowering levels of assessment for attached and multi-residential housing, and increasing allowable building heights. In addition, Council has enabled significantly increased development capacity in the major centres of Carindale, Indooroopilly and Nundah, and has a rolling program of urban and suburban precinct renewal across the city that are providing the opportunity for tens of thousands of new homes near existing transport and services.

I also note that, in the 300 commercial centres across Brisbane, residential development is permitted alongside commercial and retail uses and that most new houses (and all secondary dwellings) do not need planning approval under City Plan. This is a key part of Council's sustainable growth program, which identifies locations for new housing that are carefully aligned to existing and planned transport infrastructure, and responds to our city's settlement pattern, topography, geography and climate.



Council notes the reform directions outlined in the interim report, including proposals to impose broad and uniform increases to residential densities across urban areas, relax built form controls, allow more development in commercial zones, implement faster assessment pathways, and to better coordinate land use and infrastructure planning.

Appendix A provides high-level comments on these matters, including Council's view on the importance of ensuring housing is delivered with a focus on sensible urban management to maintain liveability and economic productivity.

The commissioners are invited to meet with representatives from Council's City Planning and Design branch to discuss this feedback in more detail. Council would welcome the opportunity to share its experience in facilitating significant housing supply within Australia's largest local government area.

To arrange a meeting, please contact Mr Martin Reason, General Manager, City Planning and Design, City Planning and Economic Development Services on [Redacted] or via email at [Redacted].

Thank you for the opportunity to provide a submission on this matter and I hope this information is useful.

Yours sincerely

Kerrie Freeman
CHIEF EXECUTIVE OFFICER

Appendix A: Council's response to the Australian Productivity Commission *Housing Supply Regulation Interim Report*

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Reform Direction	Detailed Description and Comments
Allow up to 3 storey developments across most residential land.	The Commission’s intent to enable more diverse and higher-density housing forms is acknowledged. The interim report recommends a broad requirement that would include the Low-density residential zone for 3 storey and multiple dwelling development. Council is not supportive of blanket changes without considering how they may impact affected areas and implications for the city on infrastructure capacity and planning, streetscape, neighbourhood amenity, resident liveability and local topographical context.
Allow mid-rise or high-rise apartments in high demand areas.	The Commission’s focus on increasing housing capacity in high-demand areas is acknowledged. The report notes that 69% of residential land within one kilometre of train stations in Brisbane is restricted by low density or character provisions. In applying this reform direction, it would be important to recognise that Council focuses on delivering housing choice in strategic locations that have high amenity and are walkable to services and transport, including high-frequency bus services such as Metro, CityGliders and Bus Upgrade Zone routes. These services often provide higher frequency and more flexible services than train stations, while some station locations may have lower service frequency or surrounding industrial development that limits suitability for residential growth.
Reduce or remove minimum lot size requirements.	The Commission’s interest in reducing barriers to smaller lots is noted. Council has been progressively reducing minimum residential lot sizes through amendments to <i>Brisbane City Plan 2014</i> (City Plan), while managing residential amenity, drainage, and street functions such as car parking, trees and refuse collection. Council is therefore not supportive of removing minimum lot sizes entirely due to the practical impacts.
Allow residential development in commercial zones, unless there is a clear rationale for excluding it.	This reform direction is broadly reflected in City Plan, where both employment and housing development are allowed within most commercial zones, including Mixed use and Centre zones. Council’s <i>Brisbane: Our Productive City</i> strategy aims to deliver Urban Enterprise Areas in the city which are mixed industry precincts that allow for residential development and supporting uses creating vibrant high value, low impact industrial areas that add to the residential opportunities in the city.
Review, reduce and remove land use controls that reduce commercial feasibility and do not adhere to best practice principles.	The Commission’s focus on reviewing controls that may affect feasibility is acknowledged. Council regularly reviews land use controls and design requirements through City Plan amendments, including reducing car parking requirements (removal of minimum car parking requirements in the inner city); changing levels of assessment through precinct plans; changing building heights and delivery options through the Low-medium density residential zone review; and reviewing planning controls in Major centres. Access to public transport remains an important consideration in setting car parking requirements, and appropriate solutions are likely to vary between cities across Australia. Liveability also remains an

	important consideration, and some design requirements are needed to ensure dwellings and streets meet the practical needs of residents.
Relax or remove built form controls that limit flexibility and choice for households (e.g. site cover, GFA, dwelling types, etc).	City Plan is a performance based planning scheme, which allows significant flexibility in built form controls, so that each proposal can respond to its specific context. Council has also been reviewing built form controls through precinct planning, the Low-medium density residential zone review and Major centres amendments. Any further review of built form provisions should continue to consider resident liveability needs including access to daylight and airflow, reducing heat island effect as well as stormwater filtration and planting to address external impacts.
Consider infrastructure requirements and trade-offs associated with development early through strategic planning.	The Commission's emphasis on early consideration of infrastructure requirements and trade-offs is acknowledged. In accordance with its obligations under Queensland's <i>Planning Act 2016</i>, Council maintains a Local Government Infrastructure Plan – a strategic infrastructure plan that outlines the transport, drainage, parks and other infrastructure that will be required to support growth to 2036. Council also has an equivalent Water Netserv Plan with Urban Utilities, for water and sewerage infrastructure.
Expand the use of fast-track pathways to assess simple developments.	The Commission's focus on fast-track pathways for simple development aligns with existing efforts to streamline assessment where appropriate. Council has reduced development assessment pathways to 'accepted development' or 'code assessment' where appropriate, including through the Low-medium density residential zone review for dual occupancy development, and lots less than 180sqm where a development footprint plan is in place. Houses and secondary dwellings have also long been 'accepted development' where relevant requirements are met. Where applications are needed, fast-track assessment teams have been established to streamline the assessment process.
Use State significant pathways to approve developments with a clear need for State-led assessment.	The Commission's reference to State-led assessment pathways is noted. The Queensland Government has introduced mechanisms including Ministerial Infrastructure Designations and State Facilitated Development pathways. These pathways are available where there is a clear need for State-led assessment or coordination.
Improve housing approval assessments with better coordination of referrals, use of technology including AI, and transparent reporting.	The Commission's focus on referral coordination, technology and transparent reporting is acknowledged. The Queensland Government uses the State Assessment and Referral Agency to coordinate referrals and responses from a State perspective on development applications. Council has also recently released a new internal assessment framework and system for development applications. Council is transparent with reporting on residential dwelling approvals in the Housing Supply Tracker available on Council's website. AI is currently being investigated and used as an assessment support tool.
Coordinate strategic planning for infrastructure with housing objectives.	The Commission's focus on coordinating infrastructure planning with housing objectives is acknowledged. Council's Local Government Infrastructure Plan (previously mentioned) and Long Term Infrastructure Plan identify the infrastructure required for expected growth.

	Mandatory reporting is required for infrastructure delivery and infrastructure charging. Council would support changes to the Queensland planning framework which would enable amendments to updated infrastructure plans to be fast-tracked for adoption, alongside fast-tracked land use planning.
Improve infrastructure sequencing with housing development.	The Commission's focus on infrastructure sequencing is acknowledged. Sequencing occurs in Brisbane, but flexibility is retained in the system to allow the market to respond to local needs and conditions. As a capital city, infrastructure demand can also be influenced by growth in other local government areas. Council is leveraging existing infrastructure to support housing delivery and has a rolling program of upgrades that occur over time to support additional demand.
Ensure developer contributions reflect the accurate cost of providing infrastructure (infrastructure is to have a nexus with the development).	In accordance with the Queensland infrastructure charging framework, Council operates under a capped charge regime, where standardised maximum charges apply regardless of the cost of providing infrastructure. Charges collected under this framework are prioritised in accordance with citywide priorities rather than being bound to specific areas/catchments. This statewide framework, by its nature, disconnects the nexus between localised infrastructure costs and development demand in favour of an average approach. Any changes to infrastructure charging arrangements should carefully consider the impacts on councils' financial sustainability and complex challenges which arise when recovering infrastructure charges after the completion/commencement of a development. Particularly where ownership may change or there are obligations for developers to provide trunk infrastructure.
Enhance design of developer contribution frameworks towards best practice.	The Commission's focus on best-practice developer contribution frameworks is noted. Council applies simple, consistent charges on development and updates its requirements every year to maintain transparency and currency.
Acknowledgement of commitment for funding provision.	Council acknowledges the commitment of the Australian Government in providing funding and supporting local governments to enhance timely provision of infrastructure, as outlined on page 106 of the interim report. As referenced on page 4 of the LGAQ report on <i>A fairer funding deal for Queensland communities</i>, local government is funded about 3 cents in every dollar of taxation revenue, which is the least of all levels of Government.