

Friday, 1 November 2024

Strategic Planning
City Planning and Economic Development
Brisbane City Council
by email only: strategic.planning@brisbane.qld.gov.au



To whom it may concern:

Tailored amendment package — Car parking

Thank you for the invitation to provide feedback on the proposed amendment.

Greater Brisbane is a fully volunteer grassroots collective of people who love our city and want to work to make it a prosperous and dynamic place for everyone who lives, works or plays here.

We want a Brisbane where everyone is welcome and has the opportunity to live a good life wherever they want — and fixing our outdated approach to car parking in new developments is a key part of that.

Key points

- We support the proposal to expand both the City Core and City Frame boundaries to reduce parking requirements for new homes in our city.
- We note with concern that several inner city areas with frequent public transport options, local pedestrian and cycling links and nearby shops and schools are excluded from the expanded City Frame and recommend that the City Frame boundaries be expanded to include these areas.
- This change needs to be accompanied by both a significant boost in public and active transport and a commensurate draw-down or pricing-in of on-street parking within the City Frame.
- One immediate change to facilitate this would be to expand the Brisbane Central Traffic Area to the new City Frame boundary.
- To prepare our city for hosting the Olympics, Council should begin phasing out all on-street parking within the City Core, aiming for the precinct to be car-free by 2032.
- Greater Brisbane supports city-wide zoning reform that would remove parking minimums within 800 metres of a train or Busway station or a major bus interchange and 400 metres of BUZ and CityGlider stops.

Recommendations

1. Support the proposed amendment.
2. Expand the boundaries of the City Core precinct to include the area covered by the City West Neighbourhood Plan to facilitate greater uplift of the Victoria Barracks and Normanby renewal precincts.
3. Expand the boundaries of the City Frame precinct further to include high-frequency public transport corridors within five kilometres of Brisbane City Hall, as detailed on our map on page 4.
4. Amend car parking space standards in line with our schedule on page 7.
5. Tie the Brisbane Central Traffic Area to the City Frame boundaries.
6. Change parking limits within the Brisbane Central Traffic Area to increase the cost of resident permits, cap the number of resident permits per household, and remove the time restriction on the signed two-hour limit.
7. Introduce a Council mission to remove on-street parking for non-commercial vehicles within the City Core, along key active transport corridors and around Games precincts by 2032.
8. Begin a draw-down of 2,000 parking spaces per year within the City Frame.

One of the key reasons we started Greater Brisbane last year was to raise awareness of the damage parking minimums inflict on our city.

Greater Brisbane wants a future where our streets are for people, not cars.

Car parks, whether in apartments, on the street, or anywhere else, come at the expense of better public and active transport, street trees, and more productive uses like more curbside dining or shopping.

Research and evidence from around the world clearly show the prohibitive costs of mandated parking—it drives up the cost of dwellings, reduces the amount of housing that can be built, and devalues the streetscape.

Our car-centric planning even makes our housing more unaffordable, with a single car park adding up to \$100,000 to an apartment's cost¹.

¹ Andrew Messenger, "[Brisbane city council plans to cut parking requirements in bid to slash \\$100,000 from housing costs](#)" (16 May 2024) *Guardian Australia*

In fact, some estimates put the figure as high as \$250,000 per space in expensive basement parking² — and even more conservative estimates put the cost at 10% of the final sale for mid-rise apartments³.

Excessive parking might be popular with financiers, but the research is clear that it's hardly necessary for the people who live there. A wide range of research shows that parking requirements generally overestimate actual parking needs⁴. 40% of Australian households in the 2021 Census owned one or no cars, even though many parking mandates require multiple spaces per home, including these City Frame requirements.

In well-located areas with good amenity, public and active transport connections and that are within close proximity to universities, hospitals or central business districts, many parking spaces simply aren't needed. One in four residential parking spaces in inner Melbourne are consistently vacant⁵.

Parking minimums are a huge handbrake on building affordable family-sized apartments. One of the things we hear time and again from industry who build beautiful medium-density flats in Melbourne and Sydney is that minimum parking requirements kill most medium-density projects.

You can't make a six-storey apartment stack up in inner city Brisbane — and until we rip these minimums away in more places, we never will.

Broad removals of parking minimums will change the calculus for building three- and four-bedroom apartments in our city, making our inner city more diverse and family-friendly.

This shouldn't just be for a few select inner city neighbourhoods either.

Many locations around the city are already well-provisioned with different transport options—train, metro, bus, bike, and walking—and are ripe for this kind of reform. The broader we can make these changes, the easier it will be to build and enable a more diverse housing market.

² Harri Bancroft and Gabriel Metcalf for the Committee for Sydney, [Better Parking for Better Places](#) (August 2022); Chris De Gruyter, Paula Hooper, and Sarah Foster, "[Do Apartment Residents Have Enough Car Parking? An Empirical Assessment of Car Parking Adequacy in Australian Cities](#)" in *Journal of Transport Geography* (February 2023)

³ NSW Productivity and Equality Commission, [Review of housing supply challenges and policy options for New South Wales](#) (final report, August 2024)

⁴ Donald Shoup, "[The Pseudoscience of Parking Requirements](#)" in *Zoning Practice* (February 2022)

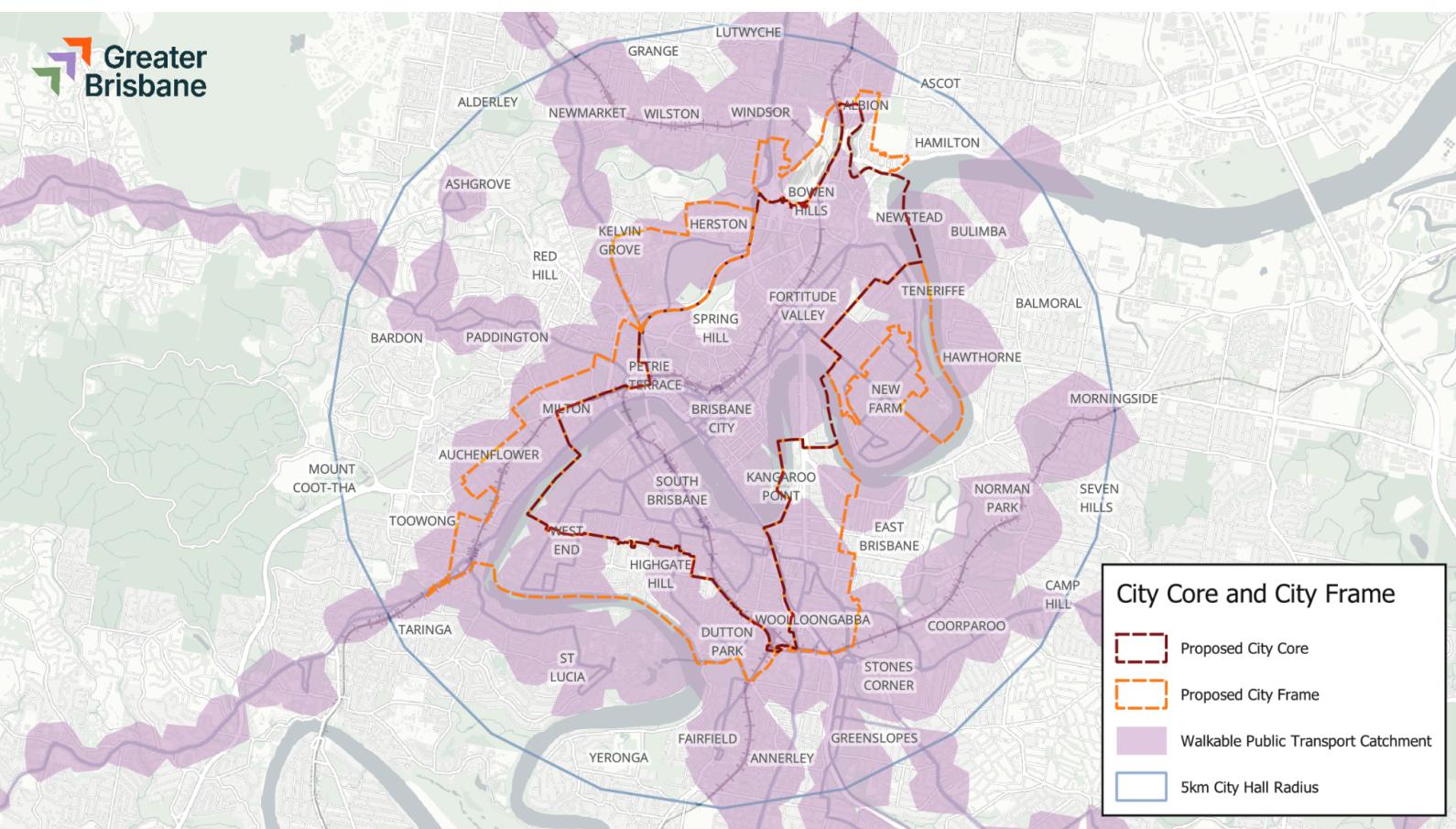
⁵ Elizabeth Taylor and Rebecca Clements, "[Empty car parks everywhere, but nowhere to park. How cities can do better.](#)" in *The Conversation* (20 July 2018)

According to Council's Vision 2031⁶, every suburb is meant to have a diversity of housing options that actively facilitate people using public and active transport for the majority of their trips.

One of the best mechanisms we have available to achieve this is reducing parking minimums and greatly expanding the areas with parking maximums.

Expanding the City Core and Frame to more natural boundaries

It's for these reasons and many more that Greater Brisbane supports these proposals — and calls on Council to go further by expanding the City Frame to include everywhere within five kilometres of City Hall that's within 400 metres of a high frequency bus stop and 800 metres of a train or ferry station⁷.



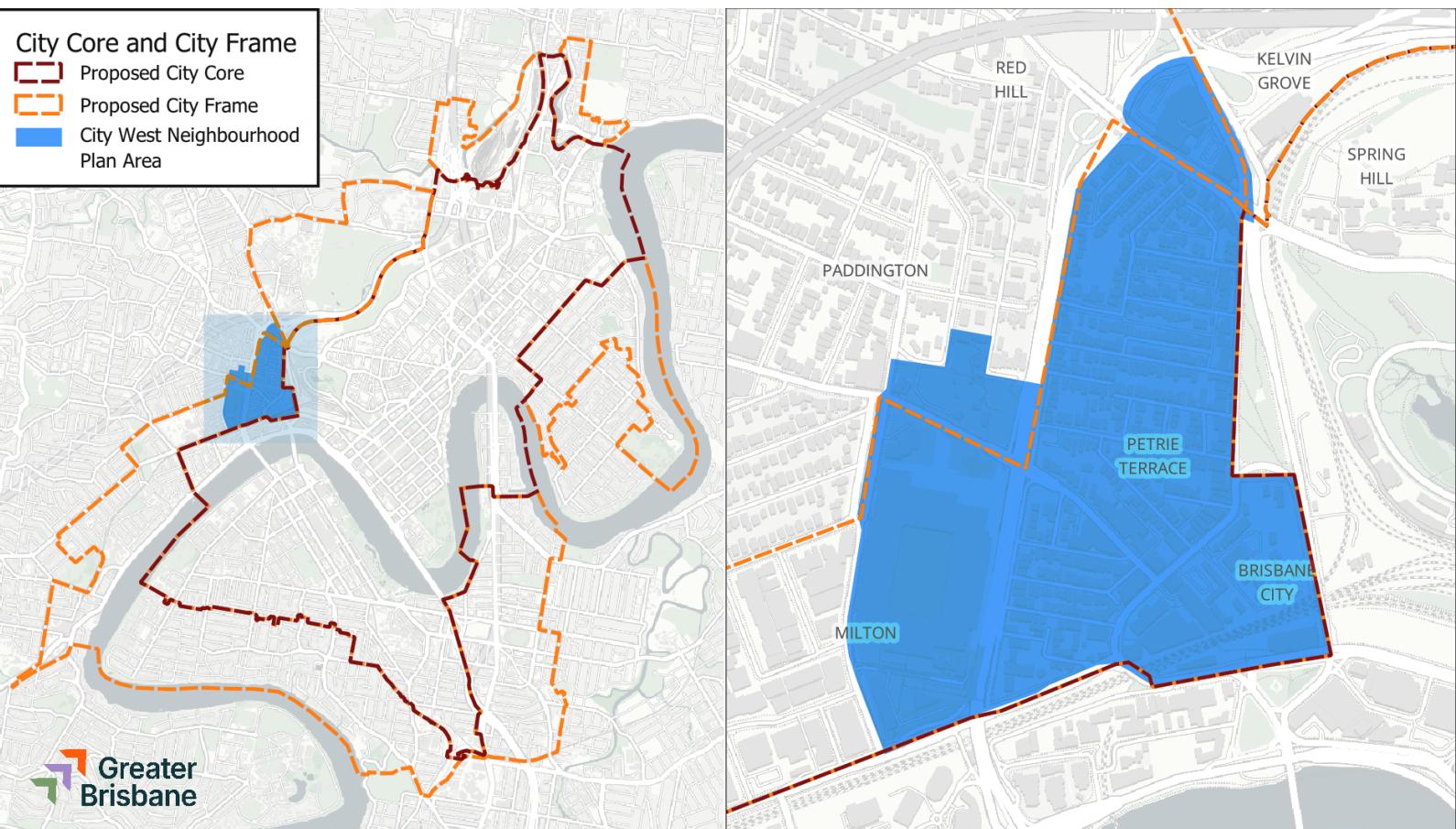
⁶ Brisbane City Council, [Brisbane's Vision 2031](#), page 36

⁷ 400 metres for buses and 800 metres for trains or ferries are widely considered to be the walkable catchment for these services and have been adopted by the Department of Transport and Main Roads. However local geography — particularly hills and barriers — influences the actual catchments. Our map uses indicative isochrones for five and ten minutes walk respectively to represent the real application of these catchments. For guidance on comparing theoretical and actual walkable catchments, refer to the Department's [Planning for Walking](#) resource hub.

We note that the City Plan already has parking minimums for non-dwelling properties within 400 metres (walking distance) of a major public transport interchange, so this change would simply extend those restrictions to multiple dwelling developments as well.

While these moves to greatly expand the coverage of city suburbs with reduced parking minimums are a welcome step, Greater Brisbane thinks we can afford to be far more ambitious—particularly as we try to prepare our city for the Olympic and Paralympic Games.

Greater Brisbane wanted to draw the Council's attention to the exclusion of the City West Neighbourhood Plan area from the proposed expansion of the City Core. Despite its proximity to the CBD, the existing City West Neighbourhood Plan does not have reduced parking minimums.



In our view, this area—with many high-frequency public transport options, very active local shops, and easy pedestrian access to the CBD and Suncorp Stadium—should be included.

This is especially important to help facilitate uplift at the Victoria Barracks and Normanby renewal precincts and to justify greater interconnectedness between the precincts and Roma Street Parklands and the future Brisbane Arena site.

These changes combined with loosening of character protections and closure of Secombe Street, Petrie Terrace has the potential to be transformed into a world-class walkable neighbourhood, home to thousands.

Tweaking parking rates

To accompany these changes to boundaries, we want to encourage Council to tweak further the car parking space standards that apply to these boundaries⁸.

The current schedule has reduced parking minimums within the City Frame boundaries and within 400 metres walking distance of a major public transport interchange⁹.

We propose replacing the existing minimums within the City Frame with maximums — albeit at a higher rate than those in the City Core.

This is in addition to our previous recommendation that areas within five kilometres of City Hall that are within 400 metres of a high-frequency bus stop and 800 metres of a train or ferry station be included in the City Frame boundary. This applies to areas within 400 metres of a major public transport interchange further than 5 kilometres from Brisbane's City Hall.

Further, we are proposing aligning the minimums for multiple dwellings and rooming accommodation and reducing the commercial minimums.

In the same way that building more roads leads to higher traffic volumes, it is now recognised that building more parking leads to higher rates of car ownership. New parking supply does not ease the pressure of parking demand, it creates more demand.

Given the proximity of frequent public transport options and local shops, schools and amenities to everywhere within the new City Frame boundaries, adopting parking maximums in these precincts means a gradual draw-down on private vehicles in a much larger area and a higher uptake of mode switching.

Our schedule of changes can be found in a table on the next page.

⁸ Brisbane City Council Planning Scheme, "Section 6: Car parking space standards" in [SC6.31 Transport, access, parking and servicing planning scheme policy](#)

⁹ Defined in this case as "*a railway station, bus station, ferry terminal or interchange which includes dedicated platforms, docks, bus parking bays, seating and ticketing facilities*"

	City Core	City Frame	Within 400 metres of a major public transport interchange
Multiple dwellings or rooming accommodation	<p>Maximum 0.5 space per bedroom (up to 2 spaces maximum)</p> <p>Maximum of 1 visitor space for every 20 dwelling units</p>	<p>Minimum 0.9 spaces per 1 bedroom unit</p> <p>Minimum 1.1 spaces per 2 bedroom unit</p> <p>Minimum 1.3 spaces per 3 or above bedroom unit</p> <p>Minimum 0.15 spaces per unit for visitors</p>	<p><i>For multiple dwellings:</i></p> <p>Minimum of 1 space per 1 bedroom unit</p> <p>Minimum of 2 spaces per 2/3 bedroom unit</p> <p>Minimum of 2.5 spaces per 4 bedroom unit</p> <p>Minimum 0.25 spaces per unit for visitors</p> <p><i>For rooming:</i></p> <p>same as City Frame.</p>
Our changes	None	<p>Maximum of 0.75 spaces per bedroom (up to 3 spaces maximum)</p> <p>Maximum of 1 visitor space for every 10 units</p>	<p>Minimum 0.9 spaces per 1 bedroom unit</p> <p>Minimum 1.1 spaces per 2 bedroom unit</p> <p>Minimum 1.3 spaces per 3 or above bedrooms</p> <p>Minimum 0.15 spaces per unit for visitors</p>
Short term accommodation	Maximum 0.25 spaces per room	Minimum 0.5 spaces per room	<p>Minimum 0.25 spaces per room</p> <p>1 staff space for every 20 rooms</p>
Our changes	None	Minimum 0.25 spaces per room	None
Commercial and other	Maximum 1 space per 200m ² gross floor area	Maximum 1 space per 100m ² gross floor area	Maximum 5 spaces per 100m ² GFA at-grade, plus maximum 2 spaces per 100m ² GFA on other levels

Brisbane Central Traffic Area

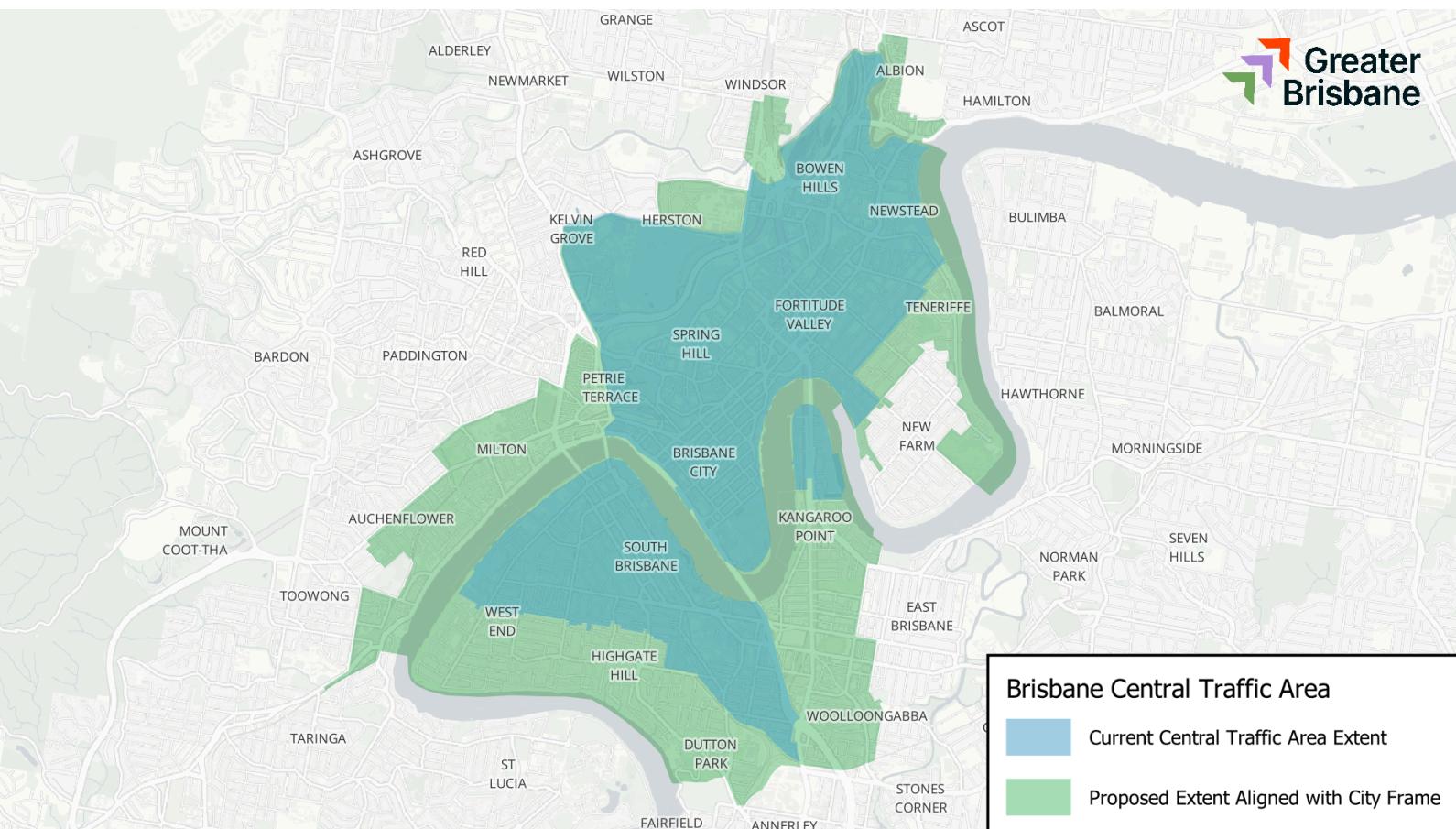
We should take advantage of these changes to off-street parking to make commensurate changes to on-street parking. While it isn't a perfect one-to-one match, the Brisbane Central Traffic Area roughly follows the contours of the existing City Frame boundaries.

The Brisbane Central Traffic Area imposes a two-hour parking limit on all on-street parking spaces within the Brisbane Central Traffic Area between 7am-6pm, Monday to Friday, and 7am to midday on Saturday unless signed otherwise.

It subsequently requires residents to apply for a parking permit to use on-street parking during these hours.

A very modest change would be to tie the Brisbane Central Traffic Area explicitly to the boundaries of the City Frame so that when one is changed, so does the other.

We also believe it would be appropriate to increase the cost of the residents parking permit by making the annual fee into a monthly fee, increase the maximum household charge to \$250 per year, cap households at a maximum of two residents permits, and extend the parking limit period to 24 hours a day, 7 days a week.

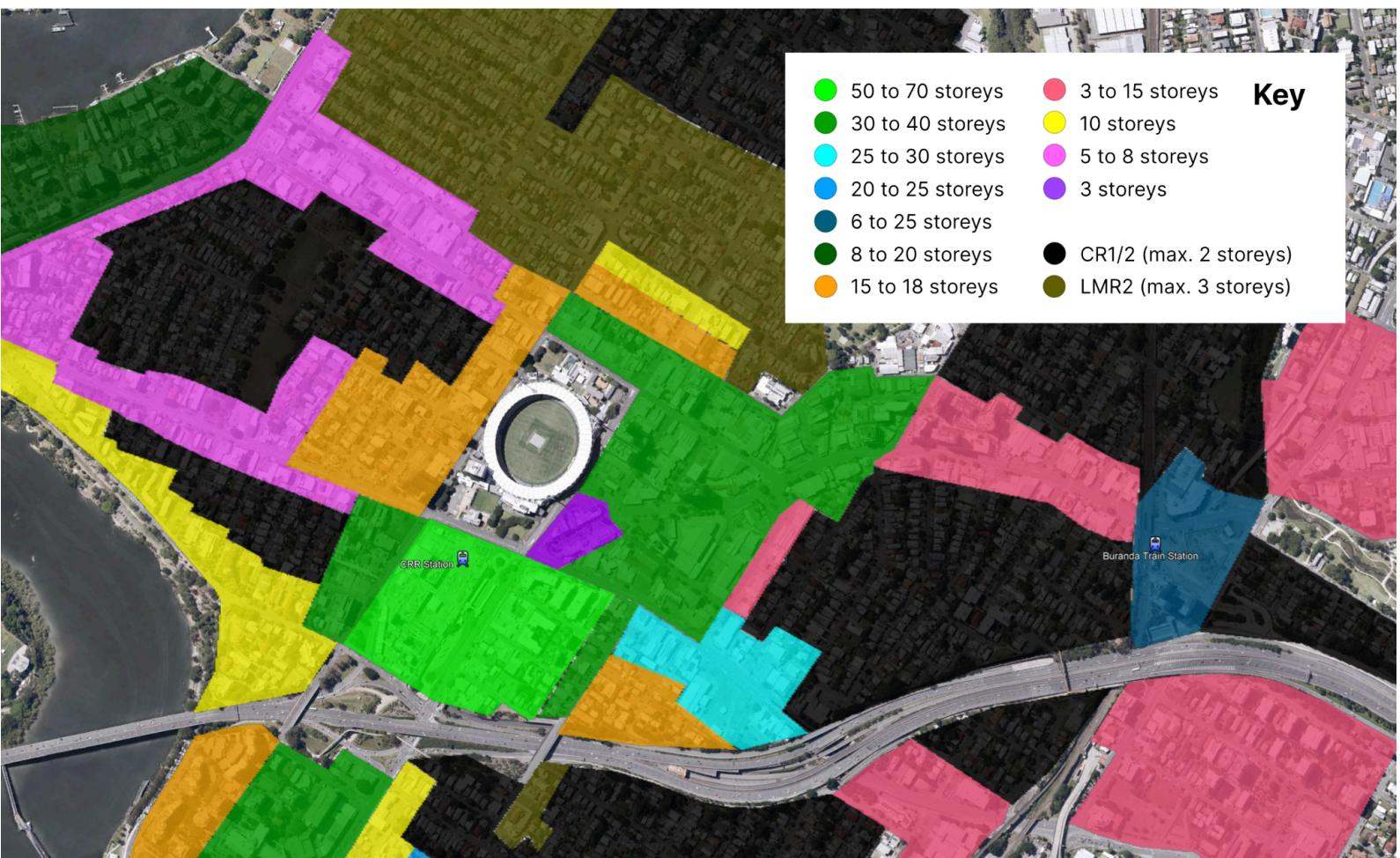


More fundamental changes to the City Plan

Greater Brisbane has been advocating for significant changes to the City Plan to reduce the number of residential zones and neighbourhood plans — and introduce three much simpler and more permissive zones based on proximity to public transport.

Our plan, modelled on YIMBY Melbourne's groundbreaking *Melbourne's Missing Middle* report¹⁰, is still being developed by our volunteer team and broadening the application of parking reform across the city features heavily.

Brisbane's focus on "spot upzoning" post-industrial land has left the vast majority of our inner city's most well-located neighbourhoods the domain of only those who can afford a detached "character home". Islands of exclusivity emerge if you map permissible building heights between the patchwork of neighbourhood plans, priority development areas, zones and other instruments like we have here near the Gabba¹¹.



¹⁰ Jonathan O'Brien et al, [*Melbourne's Missing Middle*](#) (9 October 2023)

¹¹ Greater Brisbane, [*Submission to Economic Development Queensland on the Woolloongabba Plan*](#) (17 July 2024)

This patchwork serves no one but planning consultants. It restricts development in our inner city for little reason or social benefit while making understanding our city's planning intractable and incomprehensible to the vast majority of its residents.

To fix this problem with arbitrary lines on a map determining the shape of our city and who gets to live in our most well-located neighbourhoods, Greater Brisbane will work over the coming years to abolish Low-Density, low-to-medium-density, and Medium-Density zones in the next City Plan review.

We will also advocate for reviewing all existing character overlays to ensure only private residences with genuine historical, architectural, and social heritage values are protected, setting a new flexible foundation for zoning in our city.

To replace these overly restrictive character restrictions and residential zones, Greater Brisbane has sketched out three new baseline zones, all allowing some form of mixed-use by right.

Our ***Urban Centre Zone*** would effectively apply the existing City Centre Zone to all residential, centre, and mixed-use zoned land within the City Core and any residential, centre, and mixed-use zoned land where heights greater than seven storeys are currently permitted within five kilometres of the Central Business District or 800 metres of a train, ferry, or Busway station.

This zone recognises that street-level activation is extremely important to high-growth areas. It also attempts to integrate three disconnected but overlapping concepts in our City Plan—the City Centre Zone, the City Core, and the Brisbane Central Traffic Area—into a coherent set of boundaries.

Our ***Urban Residential Zone*** would apply to all residential, district centre, and mixed use zoned land within 800 metres of a train or Busway station or a major bus interchange and 400 metres of BUZ and CityGlider stops across Brisbane. It would also apply to specialist centres and industrial land identified as underutilised or needing housing growth within the same catchment, for example future renewal neighbourhoods in Geebung and Coopers Plains. This would not replace neighbourhood centres or any community, open space, conservation or sport and recreation zoned land.

This new zone would allow any predominantly residential development up to seven storeys, regardless of the lot size. Any other low-impact use — ranging across retail and hospitality, offices, education, health, temporary accommodation or even some light industry — would be permitted. Precinct-scale projects would have to reserve at least 50% of the floor space for residential uses. Car parking minimums would be removed within this zone.

Our **Suburban Residential Zone** would apply to all other residential land outside the Urban Residential Zone catchment, as well as underutilised industrial and district centre land. However, it would not apply to neighbourhood centres or any community, open space, conservation, or sport and recreation zoned land.

This new zone would allow any residential developments up to four storeys — including detached homes, townhouses and low-rise apartments. Current car parking minimums would be retained in these areas as we would like to see a move away from on-street parking to free up suburban streets for play, planting and active transport.

This zone would also include a *corner store* rule, allowing neighbourhood hospitality, health and retail businesses to operate on any appropriately large or corner lot¹².

While liberalising small-scale commercial uses in residential areas will have building, noise, and traffic implications, Greater Brisbane believes these should be assessed under a more streamlined business permitting scheme than the existing planning regime.

Any home within these zones that should be protected on character grounds should be required to reach the higher threshold for local heritage listing rather than receive special protection merely for being built in a particular place.

Under our plan, Brisbane City Council would undertake an audit over three years to translate these blanket overlays into stronger, targeted protections.

Phased removal of on-street parking

These modest changes are, in our view, an important first step in a more fundamental shift that needs to happen to our city before the Brisbane Olympic and Paralympic Games in 2032 — removing on-street parking in our inner city entirely.

In the lead-up to this year's Games, Paris removed 70,000 on-street parking spaces within their city boundaries. That's nearly 80% of all parking in the city.

The Paris municipal government had an ambitious agenda to boost public transport ridership by 10% and proactively encourage "hyperproximity" — the majority of residents being able to access their daily needs within a short walk of their home — through zoning and regulatory changes and substantial direct investment.

¹² For a discussion in an American context, see: Linda Baker, "[The Corner Store Comeback](#)" in *Bloomberg* (3 October 2024) and Ashley Salvador, "[Want more local businesses in your neighborhood? Then legalize Accessory Commercial Units.](#)" in *Strong Towns* (17 August 2020)

One key mechanism they used to achieve this was the removal of on-street parking and significant increases to parking rates in the remaining spaces—particularly for large sports utility vehicles, which have special differential rates related to their size and weight.

Their changes paid off, with 1,000 kilometres of new bike lanes in place of car spaces leading to a 1,000% increase in cycling, 200,000 new street trees dramatically cooling the city and the long-standing “car free Sundays” that closed major roads in Paris now permanently converting those roads into parks¹³.

Even the surrounding departments of Greater Paris were inspired by Paris’ changes and undertook similar revitalisation projects in their jurisdictions.

These changes took a long time. While many of the most dramatic changes like the parking spaces removal and the restoration of the riverbank only implemented since 2020, the administration has been laying the groundwork with trials, experiments and pilot precincts for over a decade.

If we are to have even a fraction of Paris’ ambition, we need to start making changes now.

Greater Brisbane is calling on Brisbane City to commit to the total removal of on-street parking for non-commercial vehicles within the City Core, along key active transport corridors and around Games precincts by 2032 — and a phased draw-down of 2,000 parking spaces each year between now and then.

An early component of this is a mapping exercise to calculate the number of at-grade car parking spaces within Brisbane City Council. This exercise can break down the number of on-street parking spaces and the area of off-street at-grade parking including access and navigation lanes, broken down by suburb.

Without knowing how much of our city is handed over to cars and where, it’s impossible to determine the opportunity cost.

Yours sincerely

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¹³ Rowan Moore, “[How the Paris 2024 Summer Olympics are driving the city's green revolution](#)” in *The Observer* (31 December 2023)