

25 September 2026

Ms Monica Gibson
Deputy Secretary
Department of Planning, Housing, and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Sent to: regionalstrategicplanning@dpie.nsw.gov.au

Dear Monica

The Draft Illawarra Shoalhaven Plan

I write in response to the public exhibition of the draft Illawarra Shoalhaven Plan.

Urban Taskforce Australia welcomes the draft Plan as an important strategic document which will help set the direction for the Illawarra Shoalhaven region's long-term housing, infrastructure and employment investment needs.

Urban Taskforce supports the Plan's goals to help deliver 117,000 more homes, more than 101,000 new jobs and the delivery of critical infrastructure such as transport, roads, schools, and health services to support a growing and changing population, which is projected to increase by 161,000 people between 2026 and 2046.

Urban Taskforce is pleased that the Plan acknowledges the need for improved transport connections between Wollongong, Shellharbour, Kiama, and Shoalhaven and stronger connections to south-west Sydney and the Western Sydney Aerotropolis.

At a time when NSW is facing a housing supply and affordability crisis, the goals outlined in this plan, particularly around housing supply are welcome.

While Urban Taskforce supports the intent of the Plan, it will be essential that there is a commitment across all levels of government to deliver, in a coordinated fashion, on the goals and the vision contained within the Plan.

Urban Taskforce provides some specific comments below on aspects that might require further attention to realise the NSW Government's objectives.

1. Housing

Urban Taskforce supports the Plan's priority around housing and ensuring that there is a pipeline of feasible housing supply to meet the needs of a growing and changing population in the Illawarra Shoalhaven region.

We are pleased to see the Plan's goal to deliver 117,000 more homes over the next 20 years (or 5,850 new dwellings per annum).

Based on ABS and Wollongong City Council data, the LGAs that make up the Illawarra Shoalhaven are, overall, not meeting their current pro-rata National Housing Accord

targets, approving around 93% of their pro-rata housing completion target to July 2026. As not all approvals lead to dwelling completions, the percentage of completions to the pro-rata target is likely to be even lower.

Though the detailed LGA by LGA data is sparse for region based analysis, a review of the performance of Wollongong LGA is instructive. Over the period of the National Housing Accord to May 2026, Urban Taskforce researchers have found that Wollongong LGA completed just over 2,000 new dwellings, this representing approximately 60% of its pro rata National Housing Accord completions target.

The challenge will be to ensure all stakeholders work in a coordinated way to facilitate housing supply.

Urban Taskforce notes that the Plan establishes an Urban Growth Area (UGA). Further, that approximately 80 per cent of housing growth will be focused around key urban centres such as Wollongong, Shellharbour, Bowral, Kiama and Nowra with access to jobs, transport, schools and services.

Around 38,000 new homes will be built in West Dapto and greenfield areas around Nowra and Bomaderry over the next 20 years.

Infill development will be concentrated in the Wollongong, Shellharbour and Nowra city centres with state led rezonings now creating additional capacity for housing (such as the North Wollongong TOD).

We also note that across these locations some areas are proposed to evolve from low density into mid-rise housing, and several planned precincts are slated to go through large scale urban renewal.

While this is supported, Urban Taskforce encourages the Department of Planning, Housing and Infrastructure (DPHI) to work with local councils to identify any additional areas with underutilised development potential that could be progressed through the Transport Orientated Development (TOD) and Low and Mid Rise (LMR) housing programs.

While rezoning of land to support new residential development is supported by the Urban Taskforce, unless the delivery of those homes is feasible, little will be delivered.

Urban Taskforce encourages DPHI to work with local councils to ensure the development controls including height of building and minimum lot sizes, along with developer contributions such as those relating to affordable housing schemes, are set so as to stimulate investment rather than hinder.

This is particularly important in regional areas where development feasibility is lower.

Recommendation 1:

That DPHI work with local councils to identify additional areas with underutilised development potential that could be progressed through either a TOD or LMR program.

Recommendation 2:

That DPHI work with local councils to ensure the feasible delivery of housing supply by ensuring development controls and developer contribution schemes are set to stimulate residential development rather than hinder it.

2. Support a vibrant centres network

Urban Taskforce acknowledges the important economic anchor role Wollongong City plays in the Illawarra Shoalhaven region and we support measures within the Plan that will stimulate both residential and commercial activity within Wollongong City. However, it is important that the Plan supports growth and development in centres outside of Wollongong City.

Urban Taskforce encourages DPHI to prioritise urban renewal within Nowra as a regionally significant centre. Nowra needs to have a vibrant local economy supported by housing and jobs.

Urban Taskforce supports a coordinated approach to encouraging investment in transport, housing and infrastructure to ensure the renewal of Nowra into a thriving, liveable and economically sustainable regional centre.

Recommendation 3:

DPHI should lead a whole of government coordinated approach to prioritising investment in transport, housing and infrastructure, to support the renewal of Nowra into a liveable and economically sustainable regional centre.

3. Infrastructure

Urban Taskforce supports the important role the Illawarra Shoalhaven Urban Development Program (UDP) and Employment Lands Development Monitor (ELDM) play in ensuring better coordination between housing and employment generating activities and enabling infrastructure.

Aligning infrastructure sequencing to support housing delivery is key to ensuring the timely construction of new homes.

Improving the evidence base will also be critical to ensuring developers make optimum investment decisions. Urban Taskforce therefore encourages DPHI to recommence publication of the UDP dashboards that provide important data and information for stakeholders.

Urban Taskforce supports actions within the Draft Plan to encourage better coordination between DPHI, local councils and infrastructure providers to identify new or upgraded State and local infrastructure needs to accommodate increased residential development.

Urban Taskforce also notes the important and growing economic and social linkages between the Illawarra Shoalhaven region and the developing south-west corridor of Greater Sydney including the new Western Sydney Aerotropolis.

Urban Taskforce believes these infrastructure linkages, including road and rail, to south-west Sydney, along with those to central Sydney, should be prioritised by DPHI in the final Plan.

Recommendation 4:

Expansion of the UDP throughout the Illawarra Shoalhaven region to ensure improved coordination between state and local government agencies, infrastructure service providers and developers in the delivery of enabling infrastructure sequenced with housing and employment generating activities.

Recommendation 5:

That DPHI reestablish the UDP dashboards that ensures all stakeholders have access to detailed data and an evidence base to support investment decision making.

Recommendation 6:

That infrastructure linkages including rail and road to south-west Sydney, along with those to central Sydney be prioritised in the Plan.

4. Industrial Lands

Urban Taskforce supports the Draft Plan's objective to create 101,850 new jobs in the Illawarra Shoalhaven region over the next 20 years.

As outlined earlier in this submission, ensuring the delivery of both enabling infrastructure and state and local infrastructure, along with the reliability and resilience of existing infrastructure, will be key to stimulating the timely delivery and sequencing of employment generating activities in the region.

Infrastructure linkages to the new aerotropolis and associated business park, along with the growing economies of south-west Sydney will be vital to the economic well-being of the Illawarra Shoalhaven region. Urban Taskforce supports the Plan's goal of ensuring a supply target of 20 hectares of development ready industrial land per year in the UGA.

Recommendation 6:

That DPHI coordinate with local councils and infrastructure providers to ensure a pipeline of development ready industrial land.

That DPHI continue to publish annual updates to the Employment Lands Development Monitor such that stakeholders can track the availability of development ready industrial land and plan investment decisions.

Recommendation 7:

That the Plan not only priorities new and upgraded infrastructure to south-west Sydney but also ensures the reliability and resilience of existing infrastructure within the Region.

Conclusion

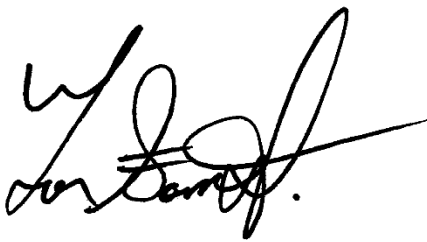
Urban Taskforce Australia welcomes the draft Illawarra Shoalhaven Plan, along with the actions and priorities it sets for the region.

It will be essential that both state and local councils ensure that housing feasibility is put front and centre in decision-making and that the industry is not burdened with unwieldy development controls and supply sapping fees, taxes and charges if this level of housing is to ever be realised.

It is equally important that both state and local governments work together to ensure the timely sequencing and delivery of enabling infrastructure with the construction of housing and employment generating activities.

Should you wish to discuss any aspect of this submission further, please contact our Economics and Planning Analyst, William Hughes, on 0418-286-530 or via email at will@urbantaskforce.com.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a stylized flourish extending from the end.

Tom Forrest
Chief Executive Officer