ILLAWARRA SHOALHAVEN DRAFT REGIONAL PLAN

RAIA NSW Chapter response to proposed changes to the draft plan.

ROYAL AUSTRALIAN INSTITUTE OF ARCHITECTS

Submission date: 28th September 2026

ABOUT THE INSTITUTE

The Royal Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with more than 13,500 members across Australia and overseas.

The Institute exists to advance the interests of members, support professional standards and contemporary practice, and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture.

The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design.

+ At the time of this submission the National President is David Wagner FRAIA.
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The Royal Australian Institute of Architects recognises the unceded sovereign lands and rights of Aboriginal and Torres Strait Islander peoples as the First Peoples of these lands and waters.

This recognition generates acknowledgement and respect for Aboriginal and Torres Strait Islander Countries, Cultures and Communities, and their ways of being, knowing and doing.

Caring for Country practices including architecture and place shaping have existed on this continent since time immemorial.

The Institute recognises a professional commitment to engage and act meaningfully through reciprocal partnership and relationships with Aboriginal and Torres Strait Islander peoples. Together we will support and develop the emergence of new possibilities for our shared future.

Australian Institute of Architects

Submission

1. Introduction

The Royal Australian Institute of Architects NSW Chapter welcomes the opportunity to provide input on the proposed changes to the draft Illawarra Shoalhaven Regional Plan.

The Institute supports the intent of the draft Plan, particularly its focus on housing supply and diversity, economic growth, integrated regional planning, Designing with Country, sustainability and decarbonisation, better transport and infrastructure, protection of environmental assets, and the strengthening of regional centres.

However, the Institute considers that the Plan requires stronger implementation mechanisms to ensure these objectives are successfully delivered. In particular, the Plan should be strengthened through clearer infrastructure commitments, design-led planning processes, transparent governance, meaningful Designing with Country practices, and more regionally balanced outcomes across the Illawarra, Shoalhaven, Wingecarribee and southern Shoalhaven.

2. Executive Summary

The Institute supports the strategic intent of the draft Illawarra Shoalhaven Regional Plan and recognises the importance of planning for population growth, housing diversity, regional prosperity and climate resilience.

The Institute also supports the Plan's recognition of place-based planning, Designing with Country, environmental protection, decarbonisation, transport integration and the need to strengthen regional centres.

However, this submission identifies several areas requiring further consideration before the Plan is finalised:

- Growth should be supported by clear infrastructure sequencing, funding commitments and delivery accountability.
- Regional planning should not be overly concentrated on Wollongong at the expense of Shoalhaven, southern Shoalhaven, Wingecarribee and other centres.
- Housing targets and density increases should be linked to design quality, services, transport access and social infrastructure.
- Greenfield expansion should be carefully managed to avoid car dependency, environmental impacts, loss of productive land and poor long-term community outcomes.
- Designing with Country should be embedded as a genuine decision-making framework, not only a policy statement.
- Transport and land-use planning should be better integrated, including improved public transport, active transport and inter-centre connectivity.
- The Plan should include clearer implementation pathways, design review processes, governance arrangements and mechanisms for ongoing professional and community input.

The Institute recommends that the Department strengthen the Regional Plan by adopting a design-led and infrastructure-first implementation framework that embeds architects, urban designers, First Nations practitioners, landscape architects, planners, engineers and community representatives in precinct planning and delivery.

3. The Institute's Position

The Institute supports the objectives of the draft Plan in principle. The region requires coordinated planning that can accommodate growth while protecting the qualities that make its places distinctive, liveable and resilient.

The Institute's support is conditional on stronger implementation detail. The Plan should move beyond aspiration and provide a clearer framework for how growth will be delivered, where infrastructure will be prioritised, how design quality will be secured, and how regional communities will participate in shaping change.

The Institute encourages the Department to treat the architectural profession as a strategic partner in implementation. Architects bring expertise in housing quality, urban form, sustainability, adaptive reuse, community wellbeing and the integration of built form with landscape, infrastructure and Country.

4. Matters Supported

4.1 Design-led strategic planning

The Institute supports early involvement of architects, urban designers and built environment professionals in strategic and precinct planning processes. Good design outcomes are established at the earliest stages of planning and should be embedded before land-use decisions, density controls or infrastructure priorities are finalised.

4.2 Increased housing supply and diversity

The Institute supports increased housing supply, greater housing diversity and well-located infill development close to services, public transport, employment, education and open space. Additional housing must be delivered in ways that improve liveability, design quality and community outcomes.

4.3 Infrastructure-led growth

The Institute strongly supports coordinated housing and infrastructure planning. Communities function best when housing, transport, employment, education, health services, open space and community facilities are planned and delivered together.

4.4 Designing with Country

The Institute supports the inclusion of Designing with Country principles and the recognition that First Nations knowledge should inform planning decisions through genuine co-design and shared decision-making with Aboriginal communities, Traditional Custodians, Local Aboriginal Land Councils and First Nations design practitioners.

4.5 Precinct planning and regional centres

The Institute supports detailed precinct planning before significant density increases or major land-use changes occur. A more balanced regional approach should recognise the role of centres

Commented [KR1]: The draft Plan uses a structure of Priorities; Responses and actions. Consider using 'priorities' here instead of objectives

Commented [KR2]: I would say the draft plan already does this in some respects (housing) - that it is more of a development plan than an aspirational strategy. Many implementation actions are proposed (urban growth area, feasible capacity targets..) My concern is that they won't make any difference to improving housing supply or diversity without significant investment by the State in public transport and increased social housing.
Perhaps we could focus the call for clearer implementation on the need for clear SPATIAL frameworks for how growth will be delivered?

Commented [KR3]: Where is this called out? I don't see 'design-led' as a clear response within the draft plan.

Commented [KR4]: And concentrating development in locations with existing infrastructure capacity, or the investment to increase that capacity.

beyond Wollongong, including Nowra as an emerging CBD, Milton-Ulladulla as an emerging major centre, and the strategic importance of Wingecarribee and southern Shoalhaven.

5. Key Concerns

The Institute is concerned that the Plan appears overly Wollongong-centric, that housing delivery may occur before supporting infrastructure is in place, and that public transport provision may not match the Plan's growth ambitions. The Institute is also concerned that current housing delivery models can compromise design quality, that greenfield expansion requires stronger safeguards, that Designing with Country risks being tokenistic if not embedded in decision-making, and that the Plan lacks sufficient implementation detail. Accordingly, the Institute does not support housing growth that proceeds without timely infrastructure delivery, poor-quality density outcomes that compromise amenity or community wellbeing, superficial Designing with Country processes that do not influence planning decisions, or growth models that increase dependence on private vehicles and undermine sustainability goals.

6. Recommendations

1. Embed design-led planning and require meaningful precinct planning before rezoning or significant density uplift occurs.
2. Link housing growth to infrastructure delivery, including transport, schools, health services, open space, community facilities and local employment.
3. Prioritise high-quality infill development in well-serviced locations before additional greenfield expansion.
4. Strengthen public transport and active transport planning through integrated land-use and transport strategies.
5. Make Designing with Country a mandatory implementation requirement at strategic planning and precinct planning stages.
6. Strengthen regional equity by further recognising Shoalhaven, southern Shoalhaven, Wingecarribee and other centres outside Wollongong.
7. Establish clearer implementation and governance mechanisms with responsibilities, timeframes, funding pathways, reporting requirements and review points.

7. Stakeholders to Support Implementation

The Institute recommends that the Department involve a broad range of built environment, transport, housing, First Nations, community and economic development stakeholders in refining and implementing the Plan, including the Australian Institute of Architects, Planning Institute of Australia, Australian Institute of Landscape Architects, Government Architect NSW, Urban Design Forum, Engineers Australia, Property Council of Australia, Green Building Council of Australia, Transport for NSW, Local Aboriginal Land Councils, NSW Aboriginal Land Council, Designing with Country experts, First Nations design practitioners, Shelter NSW, Community Housing Industry Association, Regional Development Australia, local Chambers of Commerce, Business Illawarra and Shoalhaven Business Chamber.

8. Conclusion

The Institute supports the priorities identified ~~vision in~~ ~~of~~ the draft Illawarra Shoalhaven Regional Plan, particularly its focus on housing, prosperity, Country, sustainability, environmental protection and regional resilience. However, growth must be design-led, infrastructure-first, transport-supported and locally responsive. The Plan should place greater emphasis on implementation

Commented [KR5]: I don't think this is clear in the draft Plan. I think its something we should be advocating for under concerns.

Commented [KR6]: Rather than phrasing this this way, we could suggest that the role of the other LGAs be enhanced. Wollongong is the regional centre so a level of Wlg-centric-ness is expected, but shouldn't be at the detriment of the other LGAs.

Commented [KR7]: (particularly through the Housing Delivery Authority)

Commented [KR8]: Is this a comment on the proposed Urban Growth Area?

Commented [KR9]: to enable appropriate design-led spatial design of growth precincts.

Commented [KR10]: Yes!

Commented [KR11]: I think this is implicit in the draft plan, which is interesting - just a comment.

Commented [KR12]: Could suggest a supported process - making it mandatory will not make it move beyond token.

Commented [KR13]: Association? UDF is Victorian.

Commented [KR14]: It doesn't have an explicit vision. It has Priorities based on those of the State Plan and contextualised for IS. Are the priorities what we are supporting here?

mechanisms, design quality, precinct planning, regional equity and genuine Designing with Country outcomes to ensure growth strengthens communities rather than diminishing them.

The Institute welcomes the continued opportunity to participate and provide solution-focused input as the Plan is refined and implemented.

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Yours Sincerely,

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