

# Huskisson Heritage Association Inc.

Submission: CL25.249 Shoalhaven Heritage Strategy 2025-2028  
SCC ref. 39336E.

## Preamble:

The Huskisson Heritage Association thanks the Shoalhaven City Council for voting not to reaffirm its amended Draft Heritage Strategy at its Ordinary Meeting, Tuesday 12 August 2025, and for voting instead to place it on public exhibition for comment. The Association further thanks the Council for moving to:

Receive a public briefing following the exhibition to enable the consideration of any feedback received and possible adoption of the Strategy, and that this briefing includes the many heritage groups around the Shoalhaven.

In order to facilitate this process, the HHA held a workshop open to anyone in the LGA who wished to attend on Saturday 11<sup>th</sup> September. There were over 30 attendees, and written submissions were received from others who could not attend. Documents available for referral at this meeting included the current Draft NSW Heritage Strategy and (as a good example of a local study), the Newcastle Heritage Strategy.

This submission is based on what we heard at this workshop.

## Summary:

This document is **not a strategy**, but it could be the beginning of developing a strategy. It will be referred to in this document as the 'Draft Shoalhaven Heritage Strategy' although Council's documentation links it to a policy number and **it should be a policy**. It should be linked to other council strategies and policies – e.g. Shoalhaven 2035 Community Strategic Plan, Community Engagement Strategy 2025-29, etc.

The 'top down' approach in the Draft Heritage Strategy/Policy 2025-2028 does not encompass what the community tells us they want in a heritage strategy. Further, it is diametrically opposed to the recommendations of the State NSW publication 'Recommendations for local heritage management'<sup>1</sup>

The draft document provides an in-house model of how to manage heritage. Council will 'provide advice to Council, the community ...' Council does the studies (or not, depending on funding), Council decides what goes on Schedule 5 of the Shoalhaven LEP 2014. The 'tone' is very different from several other relevant Council documents, such as *Shoalhaven 2040 – Our Local Strategic Planning Statement*, which encourages 'preserving Shoalhaven's rich heritage' through 'ongoing community collaboration' and 'continuous community engagement'

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<sup>1</sup> Heritage information series: *Recommendations for local council heritage management*, Office of Environment and Heritage, on behalf of the Heritage Council of New South Wales, page 2, Table 1, Recommendation 1.

A revised document needs to include a clear **definition of heritage** and must provide clear pathways to enable ongoing community input into the process of determining items, places and structures that hold heritage significance for the Shoalhaven community.

## Specific Comments on the draft Document:

### Best Practice???

The Draft Shoalhaven Heritage Strategy begins with a reference to ‘best practice advice’ contained in the NSW Government’s publication ‘Recommendations for local heritage management’, giving the impression that the Shoalhaven’s document would reflect this.

It fails at the very first recommendation:

1. *Establish a heritage committee to deal with heritage matters.*  
*‘The primary role of a heritage committee is to advise the council on ways in which local heritage items can be conserved and promoted. The committee’s responsibility should preferably encompass Aboriginal, built, movable and natural heritage.’*

Other high-level recommendations are also not reflected in the Shoalhaven’s draft document – for example:

3. *Appoint a heritage/urban design advisor*
7. *Present educational and promotional programs*
9. *Promote sustainable development.*

The second paragraph of the Shoalhaven’s Strategic strategy goes on to say that the Council will work with ‘local history groups ... and the community. As this submission will make clear, heritage interests are central to a wide variety of community groups including environmental, scientific, military, and so on. **The document contains no processes to assist ‘working’ with the community.**

The ‘best practice’ recommendations are for proactive encouragement, management and conservation of heritage. The current draft document is focused on Council-initiated determination of what needs to be heritage listed. The draft NSW Heritage Strategy should be used as a model example.

### Aboriginal Cultural Heritage:

The Strategy recognises this only through cultural mapping. This is a good top-level beginning that may act as a warning trigger to property owners and developers, but this is not an adequate strategy. It is not the place of the HHA to make detailed comment here, but the submission of the CEO of the Jerrinja Land Council to the draft document is supported:

*The inclusion of Aboriginal Cultural Heritage in this document is a (long overdue) positive. However, I am concerned that Council is missing an opportunity to do more than simply “recognise” our Heritage in this document. Surely Council has an obligation to, for example, protect, or promote, or preserve, or conserve – some stronger language than simply “recognise” it<sup>2</sup>*

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<sup>2</sup> Alfred Wellington, CEO, Jerrinja Aboriginal Land Council, submission to CL25.249 Shoalhaven Heritage Strategy, 12 August 2025.

## Identify places of heritage significance and list them on the LEP:

This is apparently to be done by Council staff, while the document also eliminates the recommendation to 'appoint a heritage and urban design advisor. The notes attached to the draft claim that Council itself has 'appropriately qualified staff', but so long as it remains Council's policy not to recognise a dedicated position, it will remain potluck as to whether the Shoalhaven receives good and appropriate internal heritage advice. One function of a staff heritage/urban design appointee, as the State recommendations indicate, would be to *'increase community participation, and proactive heritage and urban design management, in your local area.'*

It is unfortunate that this section of the draft strategy reflects an old fashioned and outdated vision of heritage as belonging specifically to certain preferred places (Kangaroo Valley, Milton, etc.) and puts most emphasis on built heritage in urban and village areas. This obsolete 1980s understanding of what heritage is also repeated in other SCC documents. This strategy document does not contain a detailed and nuanced definition of heritage. Such a definition would assist in community and Council understanding of what heritage actually is, and hence in being able to 'identify places of heritage significance.'

## Financial Constraints:

In several places the draft strategy claims financial constraints as a reason for eliminating various programs and policies and concludes with the ominous warning that 'The policy will be administered by Council's City Development Directorate in collaboration with internal stakeholders, **subject to funding allocation. The HHA's** reading of this is that heritage is expendable.

Financial constraints are real, but should not curtail the Strategy's intent. Heritage is not just a cost. It is also an investment with economic, tourism and community returns.

Presumably for financial reasons, an entire section in the previous strategy (2021-2025) relating to heritage main street programme, including a Nowra Façade Improvement program, has been dropped from the strategy. So too has an entire section concerning educational promotion of heritage understanding. There is no consideration of heritage publications, heritage walks or dissemination of heritage information. Currently heritage grants are on hold. There is no policy in relation to place and street namings, no policy to establish a tree register of significant trees, no policy on historic plaques and markers, no policy on statues and public art.

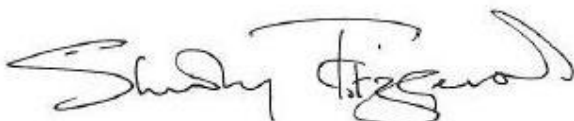
## WHAT THE COMMUNITY MEETING SAID TO US:

- The strategy should commence with an explanation of heritage. It encompasses many things, both tangible and intangible, including views, landscapes and natural formations, buildings, geology, archaeology, Indigenous culture, landscapes, community's social places and recreational areas [e.g. foreshore and Moona Moona creek], celebrating social and religious ways, industrial, and military.... The definition needs to articulate what local character/qualities must be identified.
- The document does not provide mechanisms for recognising heritage. It says that Council may engage and consult with the community 'as appropriate.' It is **always appropriate**, and it is **essential**. Therefore:

1. Heritage decisions should be community-led, not determined solely by Council.  
Rationale: No individual or council officer knows the whole of what the community values. It requires co-operative effort.
  2. The strategy must establish mechanisms for community involvement through a community Heritage Advisory Committee, working group or similar.
  3. Currently there are approximately 530 items listed in the Local Environment Plan (LEP). These listings need to be widely known and disseminated if they are to be preserved and conserved. Council workers need to be familiar with the list, councillors should be provided with the list, real estate agents need to know about the list. It should be easily located on the SCC website.
  4. Acknowledge that heritage is a benefit and not just a cost. Specifically, there is a need to recognise that tourists also value the Shoalhaven's heritage, especially its natural and environmental heritage.
- The document should make clear the links between heritage and sustainable tourism.
  - It should recognise the issue of separate legislation covering Indigenous and non-Indigenous heritage. The 'stones and bones' perspective of recording Aboriginal heritage marginalises ongoing and enduring Aboriginal heritage, including our shared cultural heritage This needs to be addressed. The HHA notes the emphasis on the importance of Aboriginal heritage in the current NSW draft Heritage Strategy., and suggests:
    - Cross cultural discussions and regular community meetings, possibly via the council's current Aboriginal Advisory group.
    - Wants the Council to stop using an outdated understanding of heritage as being located in specific favoured places and built forms – e.g. Milton, Berry etc. Heritage is Shoalhaven-wide and not place specific.
    - Education of locals and visitors on all aspects of heritage is important. This is missing from the document.

Finally, and importantly, there was concern over the failure of the SCC to **maintain and preserve heritage items**. Although care of heritage items is the responsibility of the owner/s, the process of listing and then permitting destruction is very cynical and places the Council in a poor light. Therefore:

- A Heritage Strategy needs to address ways to deal with the lack of legislative requirement for maintenance of heritage listed items. [example: the former Holy Trinity Church in Huskisson is being allowed to deteriorate, and this is a subject of ongoing distress to the community. The HHA has approached the Council about this matter and been told that nothing can be done because there is no legal obligation to do anything. The community asks the Council to address the issue of 'demolition by neglect' of buildings, environments and heritage items.



Shirley Fitzgerald  
Huskisson Heritage Association

16<sup>th</sup> October 2025