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Cultural Heritage Services Sunshine Coast Regional Council

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To whom it may concern

**RE: Response to Sunshine Coast Regional Council (SCRC) Heritage Plan 2021-2031**

OSCAR congratulates SCRC on the development of this their second Heritage Plan. Thank you for the opportunity to make comment on the Plan.

By developing this plan Council, with advice from its Heritage Advisory Board has had the foresight to undertake this responsibility. Many local governments have very poor or non-existent approaches to heritage.

For that we congratulate you. Our comments and recommendations are made in the spirit of good will, being constructive and supportive of the initiative.

Our response is on the following pages.

Yours sincerely

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# OSCAR response to Sunshine Coast Regional Council Heritage Plan 2021-2031

## Introduction

OSCAR congratulates Sunshine Coast Regional Council on the draft Heritage Plan 2021-2031 and appreciates the opportunity to comment on the Plan. We also acknowledge the commitment, contribution and achievements of both Council and the Sunshine Coast Heritage Reference Group (SCHRG) and the role both have played in cultural heritage in the region since 2009 when the Heritage Levy was introduced. *SCHRG met for the last time in 2020*. If this statement means the group has been disbanded then this is disappointing as we will always need advice, mentoring and at times a reality check on our understanding and actions.

We also congratulate Council and our First Nations representatives on the introductory letter (p8). The quotation as follows puts into perspective a key part of our heritage:

*Our cultures are living cultures and we continue to gather for large celebrations as we have done for millennia – for our Oyster, Mullet and Bunya festivals. (Heritage Plan p8).....*

*‘Truth telling is a significant part of our journey. We are committed to better understanding the collective history of the Sunshine Coast and the experiences of First Nations people. Legacy issues resulting from colonisation are still experienced by Traditional Owners and First Nations people. We recognise our shared history and will continue to work in partnership to provide a foundation for building a shared future with the Kabi Kabi people and the Jinibara people.’ (Sunshine Coast Community Strategy 2019-2041). (Heritage Plan p8)*

The Plan describes heritage as “what is passed to future generations”. (Heritage Plan p 10)

*Heritage holds great value, in that it:*

- *Provides a shared understanding of who we are, and provides a sense of belonging and identity*
- *Calls for the remembering of past people, events, eras and practices, and provides us with connections - temporal, emotional and physical*
- *Brings cultures together to revive traditions*
- *Defines the image and identity of the region and contributes to the natural advantage of the region*
- *Has the potential to provide experiences that support economic development and increased tourism.*

The Vision proposed by the Plan – “Our heritage is our gift for the future”, along with the description of heritage as “what is passed to future generations” are very powerful statements which we support. OSCAR suggests that as we create our current history we should keep these statements in the forefront of our mind. This relates particularly to our approach to planning, development, transport and provision of open space.

OSCAR supports the values as described above, but feels that at times the endorsed mantra of growth and development overrides these values. We were also very supportive of the Heritage Amendment process undertaken by Council in 2019.

The Section -**How the Plan was developed** demonstrates the extensive process undertaken by Council in developing the second Heritage Plan.

OSCAR supports the identification of the 5 Outcome Areas – Knowledge, Conservation, Support, Communication and Advocacy. (p12) and congratulates SCRC on the Implementation Plan, Measures of Success, the Monitoring and Evaluation processes and the benchmarking of the Heritage Plan themes. Furthermore it was valuable and impressive to see the evaluation of the 2015-2020 Plan.

There are however, a number of questions, limitations and recommendations that we would like to make.

### Identified areas of Concern/questions.

- The section the Role of Council (p13) makes reference to stewardship by Council. Item 2.3.2 of the Implementation Plan (p35) references *“support to community and privately-owned and/or managed listed places through the provision of a Heritage Advisory Service and Heritage Incentive scheme.”* Why, given that statement does SCRC not take a more proactive role in the maintenance of existing heritage buildings and places”, by including the process of Essential Maintenance Orders (EMOs). Such orders would apply where any of the above have not been successful in preventing “demolition by neglect”. This is further supported by the theme for **Conservation** as per the Pie Chart on *page 19 Best practice conservation management and innovative solutions protect and conserve the Sunshine Coast’s natural and cultural heritage for current and future generations.*
- The **Conservation theme** as per the quotation above makes reference to both *“natural and cultural heritage”*. The Heritage Plan appears to be focussed almost exclusively on cultural heritage and yet the natural heritage we leave is also a gift to the future, or is it a legacy that will disappoint our descendants? The question is why is the focus predominantly on cultural heritage and in particular European tangible/built heritage, and so little on our natural heritage?
- OSCAR appreciates the work being undertaken with Traditional Owners and looks forward to an increasing focus on First Nations Heritage, including culture, art and stories as well as significant and special places, features and sites. However, we are concerned that many places, values and special areas to our First Nations people have not been identified, recorded, recognised or celebrated. As the message from the First Nations representative in the introductory section (p8) says: *‘Truth telling is a significant part of our journey. We are committed to better understanding the collective history of the Sunshine Coast and the experiences of First Nations people.’* As well as being part of SCRC’s Reconciliation and Action Plan truth telling must be a part of our heritage story, including legacy issues as a result of colonisation, still being felt by First Nations People. Genevieve Jones reminds us that: *“For Aboriginal cultural heritage the Aboriginal Cultural Heritage Act 2003 administered by the Qld Govt DATSIP doesn’t always protect sites and too many sites are left to be built over and destroyed”*. It is our understanding that the recently proposed Bli Bli Planning Scheme Amendment includes areas that should be assessed for Aboriginal cultural heritage and that no PS Amendment should even be considered until such assessment is undertaken.
- The section - What is heritage? - states *“Our heritage is a significant contributor to the character and identity of the Sunshine Coast. It is woven into our natural, built and cultural environments. It is a fundamental element of the region’s sense of community and plays a major role in the desirability of the Sunshine Coast as both a place to live and a place to visit.”* (p10) Vice versa, the character and identity of different parts of the Sunshine Coast

contribute to our heritage and contribute to the differences in heritage across the Coast. Character and identity are some of the intangibles that should be referenced in a Heritage Plan. Reference to “intangible heritage” is only made in the Knowledge Outcome, under the Goal: *Heritage, its value and significance to the Sunshine Coast community, is comprehensively researched, recorded and shared. (p34)*. Strategy 1.1.3 states: *Assist local heritage organisations and the Sunshine Coast Heritage Library to capture and share contemporary events and intangible heritage within their knowledge databases*. Our character and identity should be represented in more than knowledge data bases. They should be and some are celebrated through events and related activities. However, they should be recognised in, and applied to our planning instruments. This will require the Council to recognise that perhaps there is a need to give more thought to how, where and what type of development should occur, rather than the “cookie-cutter” development currently allowed.

- In the Implementation, Plan Strategy 3.2 is headed “*Build the capacity and sustainable professionalism of the region’s network of heritage community organisations*”. We remind SCRC that people and organisations build their own capacity but SCRC plays an important role in **facilitating** such.
- The Action Plan makes no reference to SCRC facilitating its own staff building their capacity in relation to heritage issues, particularly those staff not directly involved in the Heritage Area, for example planning staff. How does SCRC plan to facilitate such a process?
- The Pie Chart on *page 19* includes under **Advocacy**: *Key decision makers have an increased awareness and appreciation of the region’s diverse heritage, and 5.1.1 in the Implementation Plan refers to all levels of government and 5.1.2 to SCRC staff and councillors. Why aren’t business, industry leaders and developers included in this process?*
- There is clear need in relation to 5.1.2 of the Implementation Plan for SCRC Planning staff to be as familiar and passionate about heritage as are the council Heritage staff.

### **OSCAR recommendations**

OSCAR endorses the Heritage Plan and makes recommendations suggesting some wording changes/and or additions as well as a policy recommendations.

1. OSCAR supports the Implementation Plan in and its associated actions in general, however with a rider as expressed in Recommendation 2 following.
2. OSCAR recommends that the submission made by Genevieve Jones be given a high priority in consideration of feedback and that actions recommended by her are included in the Heritage Plan.
3. That prior to any PS Amendments being proposed and landuse or zoning changes made as part of the new Planning Scheme development, an assessment of known sites, or potential areas where significant sites, values, storylines past and present exist; be made by a qualified archaeologist (specialising in Indigenous Archaeology). This relates particularly to residential, industrial, tourist or other development that will have significant impact on the landscape and indigenous cultural values.

4. That a far greater emphasis in the Heritage Plan be placed on natural heritage and that due protection is ensured, particularly through the Planning Scheme both the existing and the new one to be developed over this term of council. This includes for example: – turtle nesting sites and locations; sites in suburbia where wallabies, kangaroos, koalas and other native creatures survive; areas with significant vegetation and or landscape features and which come under development pressure in the name of economic progress.
5. OSCAR recommends that Council, “When planning land use changes for specific areas and sites, consult widely with the community, and also consider the social values and cultural heritage values of such areas”. (Genevieve Jones). We also recommend that character and identity of towns and local areas are recognised as part of our heritage and acknowledged as such and that they have both intangible and tangible values.
6. That in **Action 2 Conservation Outcome, Strategy 2.3 - Assist the community and council in the care of heritage places and collections (p35)**, SCRC include recommendations made by OSCAR in their 2019 response to the Heritage Amendment as follows:
  - a. That listing a property be considered as a mutual obligation, council negotiates with the property owner re an individual listing and that where financial need is identified, council support the maintenance schedule of a listed property under a system of maintenance grants.
  - b. That SCRC (in the event of there not being applicable grants currently available), develop a system of Essential Maintenance grants for application under this amendment. Grants to be subject to application processes as apply to other council initiated grants programs.
  - c. That council implement a policy of Essential Maintenance Orders (EMO) to protect existing heritage places and ensure that properties don’t become “demolition by neglect” casualties with their only record pictures in a history book or on a website.
  - d. That a council undertake the required steps under State Legislation to become a *Prescribed Local Government*, by regulation to utilise Essential Maintenance Orders, having demonstrated it has the skills and procedures to utilise them appropriately. We understand the Palmwoods Living History society have been advocating for such a move since 2015. (Reference Palmwoods Living History Society submission in re the current amendment).

**Comment** – in recent days there has been considerable media coverage relating to Lamb House in Brisbane, a house built late in the 19<sup>th</sup> Century and in considerable disrepair. It would be a tragedy if any heritage is lost on the Sunshine Coast owing to “*demolition by neglect*”.

7. **Action 3, Support Outcome, Strategy 3.2 (p36)** is headed “*Build the capacity and sustainable professionalism of the region’s network of heritage community organisations*”. OSCAR recommends that this be changed to “**Facilitate/enable the region’s network of heritage community organisations to build their own capacity and professionalism supported by SCRC.** To imply that SCRC can” build capacity” of a group, network or individual works on a deficit model and is often considered by individuals and groups as somewhat arrogant. However, groups are happy for SCRC to work alongside them and by mutual sharing, the capacity of Council departments, officers, groups and individuals will benefit and growth in knowledge, skills and professionalism can occur.

Under the OSCAR's proposed heading, Strategy 3.2.1-3.2.6 will present a more equitable picture. Perhaps 3.2.2 could read ***"Involve or collaborate with the heritage sector and industry"***, using the IPA2 model of community engagement. Involving and collaborating with groups is more respectful of community members and does not present a community deficit model or a top down approach.

8. **Action 4 Communication Outcome**, Strategy 4.3 (p37) is headed: *Expand audience understanding of and appreciation for the region's cultural heritage*. The strategy for 4.3.2 identifies *"engaging new audiences focussing on young people, to stimulate interest in and appreciation of, the region's heritage"*. OSCAR recommends that as an action in that strategy that: SCRC bring to life the "Historic Cultural Heritage" places of the Sunshine Coast by negotiating with relevant teacher associations, for example History Teachers' Association of Queensland, the English Teachers' Association of Queensland, the Geography Teachers' Association of Queensland and the Primary English Teachers' Association to:
  - a. Relate and document the Sunshine Coast Historic Cultural Heritage to current history, social studies and social science curriculum.
  - b. Enable and assist the development by the above organisations of units of study and associated field activities based around historical cultural heritage. (OSCAR presumes that there are teachers who are already undertaking such work and maybe prepared to share their work).
8. OSCAR strongly recommends that Council ensure that staff capacity – knowledge, understanding and commitment is increased re tangible AND intangible heritage issues, through training and work experience or exchange within the Heritage group. This applies particularly to those staff not directly involved in the Heritage Area, for example planning staff. OSCAR considers that it is a planner's role to advocate for the conservation of all aspects of the Sunshine Coast's heritage through the current and new Planning Scheme and everyday development assessment and approval, and they need the skillset to develop awareness of and be passionate about heritage.

## Conclusion

OSCAR acknowledges the work undertaken by all who participated in the development of this Plan. Council as a whole should be congratulated for including Heritage as a significant policy area and allocating resources to facilitate "our gift to the future". Council is also to be congratulated for taking at times bold steps in this area. OSCAR asks council to be bolder and see the opportunity to ensure that all heritage gifts are able to be passed on to future generations and not lost.

We thank you again for the opportunity to respond to the Heritage Plan.