

CITY OF
HOLDFAST BAY

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submission

22 February 2006

Heritage Inquiry
Productivity Commission
PO Box 80
BELCONNEN ACT 2616

Dear Sir/Madam

Brighton Civic Centre
24 Jetty Road Brighton SA
5048

PO Box 19
Brighton SA 5048

Phone (08) 8229 9999
Fax (08) 8298 4561

**Gleneig Customer Service
Centre & Library** 2 Colley
Terrace Gleneig SA 5045

Web Address
www.hold fast.sa.gov.au

**Productivity Commission Draft Report
Conservation of Australia's Historic Heritage Places**

I refer to the Productivity Commission's Draft Report dated December 2005 regarding the Conservation of Australia's Historic Heritage Places.

As stated in the Background to the Terms of Reference for the Commission's inquiry, *"the conservation of our built historic heritage is important. Places of historic significance reflect the diversity of our communities. They provide a sense of identity and a connection to our past and to our nation"*.

Heritage conservation is a strong value within the City of Holdfast Bay community and defines and shapes the character of the City. In representing its community, Council encourages, facilitates and recognises heritage conservation through a number of programs including monetary incentives to assist in building restoration/maintenance and through holding biennial Character Restoration Awards to recognise community efforts in conserving the city's heritage.

Like many other inner suburban or urban coastal councils, the City of Holdfast Bay is currently experiencing an unprecedented rate of development, during which Council considers heritage conservation and the protection of the urban fabric is a significant imperative to ensuring the long-term appeal and sustainability of the area.

Council's heritage programs and conservation initiatives have a number of positive effects for the City, including those relating to amenity and tourism promotion, in addition to the preservation of history and the enhancement of community identity. Council is concerned that the Commission's current Draft Recommendations will severely undermine the significant work and efforts that Council and its community has invested over the past 14 years in heritage conservation to ensure the preservation of heritage items for future generations. Council therefore expresses grave concern regarding the fundamental principles and recommendations of the Draft Report, particularly the Commission's Key Recommendation that:

"Privately-owned properties should be included on a national, State, Territory, or local government statutory heritage list only after a negotiated conservation agreement has been entered into and should remain listed only while an agreement is in force. "

In addition to the significant work undertaken at the local level, the South Australian State Government has also undertaken extensive work to protect South Australia's heritage. Indeed, as part of its *Heritage Directions* initiative, the State Government has recently proposed to strengthen processes for listing local heritage places through the planning process. The response to conserve heritage is further supported by community groups which have formed to respond to issues related to development pressure, such as heritage conservation, urban sprawl and loss of character.

It is noted that heritage listing of a place, building or item in South Australia is based on merit, relevant legislation and professional adjudication, as listing relates to heritage value. It is important to note that the process of heritage listing is quite a separate and different process to the management of heritage. In this regard, it is important to clarify that local heritage listing in the City of Holdfast Bay does not

prohibit or preclude the development of a property. Heritage listing is simply one of many controls utilised by government to regulate land use and development (while other controls address matters such as building height, for example).

The management of heritage should also be supported through a range of mechanisms that facilitate and enable owners of heritage buildings to adapt and reuse listed buildings to suit contemporary needs. In this regard, there are a range of land use planning and management methodologies that have been well tested and established over the past 30 years in South Australia through the application of incentives and concessions to facilitate the ongoing development and use of heritage buildings. An example in the City of Holdfast Bay is the relaxation of car parking standards in Jetty Road, Glenelg (a busy seaside commercial precinct) to enable changes in land use and development to occur.

Further, while Council recognises the significant contribution that heritage-listed properties make to the urban fabric, it also recognises the additional imposition that such listing has on owners of these properties. As a result, Council offers financial incentives and grants to those willing to restore and maintain their locally heritage listed properties in a manner consistent with the heritage listing. In addition, Council has implemented local heritage trails to link its significant heritage places. These trails not only provide an important interpretive element to the city's history and evolution, but are an important element in attracting tourists to the City of Holdfast Bay and thus, enhancing the local economy.

Rather than the Commission's suggested approach, which appears to support a 'pro-development philosophy that would benefit a few individuals and business entities, the issue of heritage conservation should be managed through a 'greater good' approach, which takes into consideration our history, our social need for a 'sense of place' and identity, cultural benefits, and inter-generational equity. Council is therefore opposed to the implementation of the Commission's recommendations, which will result in the loss of history and story-telling, which is fostered through heritage conservation and strongly supported by the City of Holdfast Bay community.

Furthermore, implementation of the Commission's recommendations would require a greater resource and funding commitment from councils and their communities to both unravel the hard work already expended on local heritage listing and the significant efforts that would be required to negotiate and implement new agreements. With greater accountability constantly being placed on local government by the State and Federal Governments in a range of areas, this additional resource and funding commitment will be significant and would exceed current resource capacities. Notwithstanding Council's fundamental opposition to the proposals outlined in the Report, should the Commission's Recommendations be implemented, the Federal Government will need to commit to substantial ongoing funding support for local government and their communities.

Consistent with the Federal Government's designated approach of *subsidiarity*, whereby matters of local heritage significance are handled by local government, it would appear logical and legally appropriate that implementation of the same should be administered by local government. Notwithstanding this, the Commission's Draft Recommendations appear to remove the responsibility for each State and local government to handle heritage, which is exemplified by its numerous recommendations that propose wide ranging changes to the methods and processes that are currently used in South Australia in particular, by State and local governments to manage heritage.

Overall, the City of Holdfast Bay is of the view that the Commission's recommendations will result in:

- Erosion of the extensive heritage conservation work accomplished in previous decades, at both the State and local levels;
- Serious cost implications for local governments and their communities in terms of incentives and the costs involved in the negotiation process for individual conservation agreements, in addition to legal fees for review of draft agreements;
- Loss of historically and culturally significant items across Australia; and
- Diminished character of places, particularly at the local level, thus adversely affecting the aesthetic and/or cultural value of a place, tourism appeal, tourism economy, and economic development opportunities.

In addition to the fundamental concerns raised above, Council also wishes to make a number of specific comments in relation to some of the Draft Findings and Recommendations in the Commission's Draft Report. These comments are detailed in Attachment 1 to this letter. For your review, please find provided as Attachments 2 and 3 respectively the City of Holdfast Bay's Conservation Guidelines and documentation for the Heritage Incentives Scheme.

In the context of the comments above, Council is fundamentally opposed to the execution of the recommendations contained in the Productivity Commission Draft Report - *Conservation of Australia's Historic Heritage Places*, as they appear to be purely economically driven and are not considered satisfactory in terms of the basic principles of sustainability and the triple bottom line approach.

Yours faithfully

**Executive Manager
Strategy & Development**

Encl.

Attachment 1

Provided below are Council's responses to specific sections of the Commission's Report:

Draft Finding 5.1

There is a high level of discretion for decision-making on heritage matters at the local government level, derived in part from limited State Government guidance and this has resulted in inconsistent outcomes within many local governments.

It is acknowledged that decision making processes on heritage and other matters would vary greatly between local governments and more so between States. However, within South Australia, the State's *Development Act 1993* and the *Heritage Places Act 1993* provide clear criteria/guidelines for heritage listing and conservation, and the State Government issues Heritage Bulletins to local government to clarify how heritage requirements apply, how listing can occur, and the implications of such listing. Due to the criteria provided by the *Development Act 1993*, some consistency in local heritage listing is achieved within South Australia:

- S.23(4) A Development Plan may designate a place as a place of local heritage value if*
- (a) it displays historical, economic or social themes that are of importance to the local area; or*
 - (b) it represents customs or ways of life that are characteristic of the local area; or (c) it has played an important part in the lives of local residents; or*
 - (d) it displays aesthetic merit, design characteristics or construction techniques of significance to the local area; or*
 - (e) it is associated with a notable local personality or event; or (f) it is a notable landmark in the area; or*
 - (g) in the case of a tree (without limiting a preceding paragraph)-it is of special historical or social significance or importance within the local area.*

Notwithstanding such provisions, it is acknowledged that there are occasional circumstances through which inconsistencies may arise, including:

- Limited support on assessment matters from the State's Heritage Branch (within the Department of Environment & Heritage), which receives referrals regarding State-listed items (but not locally-listed heritage items);
- Court approvals that overturn Council decisions that had sought to provide consistency regarding heritage conservation; and
- Certain cases rely on opinions from heritage advisors/historians/architects, which can lead to inconsistencies due to a level of subjectivity.

The issues identified above could and should be addressed individually, rather than through a complete overhaul of the system that does not specifically address these issues. Indeed, individual negotiated agreements for each heritage item are likely to result in an increased level of inconsistency in the management and regulations for the conservation of heritage items.

Draft Finding 5.2

While statements of significance are recommended in State guidance material, no State requires its local governments to include a statutory statement of significance in their local heritage lists. The absence of such statements seriously impairs subsequent decision-making about listed properties.

The City of Holdfast Bay is not opposed to the addition of such statements of significance in the local heritage list. However, the Commission has not provided a Recommendation to correlate with this Finding.

It is noted that the City of Holdfast Bay's heritage reviews include Relevant Criteria referring to the *Development Act 1993*, the Extent of the Listing, and Conservation Recommendations, all of which contribute significantly to decision-making processes.

It would be a small additional step to instead recommend to State Governments that the relevant heritage legislation be amended to require the preparation of a "Statement of Significance" for each place, which would be a preferable approach.

Draft Finding 5.3

Heritage conservation areas impose less stringent restrictions on the ability to demolish and redevelop properties than do individual heritage controls.

It is reasonable to suggest that a heritage conservation area/zone might impose less stringent restrictions for demolition. However, the intent of a heritage conservation zone is not necessarily to protect individual buildings but to conserve the character of an area. Accordingly, it is appropriate that demolition controls for buildings [that are not individually heritage-listed] within a heritage conservation area should be "*less stringent*".

In South Australia, Planning SA's Planning Bulletin regarding heritage (published October 2001) specifically provides guidelines for management of conservation zones/policy areas. The Planning Bulletin states that "*Historic (Conservation) Zones or Policy Areas should comprise and demonstrate:*

- *Significant built form composed of historic elements that contribute to the character of the streetscape;*
- *Physical character including natural and cultural landscapes and land division patterns which relate to historic development of the local area; and*
- *Unified, consistent physical form in the public realm with an identifiable historic, economic or social theme associated with an earlier era of development."*

Planning SA also advises that "*Development Plan policies for Historic (Conservation) Zones or Policy Areas should:*

- *Conserve the elements which contribute to the historic values of the area;*
 - *Clearly identify how opportunities for in fill development are to occur by providing policies to guide in fill/replacement development within the area, -*
 - *Ensure that new buildings reinforce and enhance the historic character of the zone; and*
 - *Encourage, where appropriate, sensitive additions to the built form."*
-

Draft Finding 5.4

Heritage controls can be applied to properties that have not been individually listed or contained within a heritage conservation zone. Typically, the owner is informed only upon seeking development approval.

Within South Australia and the City of Holdfast Bay, it is not accurate to suggest that property owners are informed of heritage controls only at the time of seeking development approval. While the City of Holdfast Bay is not aware of procedures applied interstate, the Development Plans in South Australia are very specific, and the only properties affected by heritage regulations are those that are either on a heritage list or within a heritage conservation zone. Also, the City of Holdfast Bay Development Plan identifies which items are of contributory heritage value.

It should also be noted that 5.25(12) of the *Development Act 1993* requires that an owner be notified of the listing of a locally-listed heritage item before it is formally gazetted into a local Development Plan.

With specific reference to the development application examples cited on pages 98-99 of the Commission's Report, it is noted that good statutory planning necessitates the assessment of a proposal in the context of the surrounding environment, "*similar to an amenity and neighbourhood character assessment*" (page 99 of Draft Report), which could reasonably include heritage items and/or conservation zones.

Draft Finding 5.5

Many property owners do not fully understand the effect that heritage listing has on their property. This is not simply a reflection of a lack of awareness by owners of the implications of listing, rather it flows from unclear legislative requirements and inconsistent administrative actions. More specifically, it is a direct result of the failure of all State Heritage Acts to specifically require a statement of significance for heritage listing at the local level.

Due to the significant legislative imposition that now exists at both Federal and State level, it is unreasonable to expect that every Australian citizen will be familiar with all legislation, including that relating to heritage.

The Commission's Report does not appear to base this Finding on quantifiable evidence, instead providing random statements. Indeed, while the Report provides information regarding the survey of local governments, it does not include any survey questionnaires or results to indicate the source of claims such as that in Finding 5.5.

It should be noted that, through the Council offices, libraries and the website, the City of Holdfast Bay makes four (4) different Conservation Guidelines (information sheets) available to the community.

Draft Finding 5.6

There is significant scope to improve the management of heritage conservation by local governments in their systems and processes for land use and planning.

Noted. Council is continually improving conservation management practices. However, the Commission's recommendations would effectively 'undo' the improvements that the City of Holdfast Bay already has in place.

Draft Finding 6.2

Current methods of identifying historic heritage places for statutory listing focus on the benefits expected to accrue to the community. Typically, there is little, if any, consideration of the costs imposed either on the owner or the community more generally.

The concept of the Commission's current proposal being more equitable is accurate only for those heritage places that are open to the public. As most locally listed heritage items are often privately-owned premises, they are not open to the public and, accordingly, the full cost of their maintenance should not be carried by the general community (ie. via councils). In any event, the City of Holdfast Bay and many other metropolitan councils have heritage incentive schemes to support the management of heritage in the Council area. A copy of the City of Holdfast Bay heritage incentives scheme is provided at Attachment 2.

Draft Finding 7.1

The three-tier legislative framework is an appropriate model for government involvement in heritage conservation. It delineates the responsibility of each level of government for historic heritage conservation and, consistent with the principle of 'subsidiarity', aligns the scale of heritage significance with its level of government decision-making.

Agreed. However, the Commission's Draft Recommendations appear to contradict this approach.

Draft Finding 7.2

Negotiated agreements are desirable as they facilitate voluntary conservation and ensure the costs of conservation are considered alongside the community benefits.

The current heritage conservation arrangements in South Australia facilitate a 'guided' approach to voluntary conservation work of heritage-listed places. Also, South Australia's *Development Act 1993* does not impose any requirement upon an owner to conserve a place. In fact, there are examples in this Council area where owners have allowed their properties to fall into a level of disrepair that has necessitated demolition (eg. 3-5 Acacia Street, Seacliff).

Draft Finding 7.4

State, Territory and local governments do not have a systematic framework for the management of, and expenditure on, the conservation of government-owned heritage places. Management of government-owned places could be improved through the introduction of conservation management plans and transparent reporting of expenditure on conservation.

Agreed. As this is a desirable approach, the City of Holdfast Bay has prepared and implemented conservation management plans for some of the Council-owned heritage places. However, local government is limited by resources, and a legislative requirement for a conservation management plan for each Council-owned heritage place will be financially onerous for Council and the community. If such an approach were adopted, the establishment of a State and/or Federal heritage incentives scheme would be appropriate.

Draft Finding 7.5

At the State, Territory and local government levels, there is an over-reliance on prescriptive regulation to achieve heritage conservation objectives. In many cases, this has led to poor outcomes, through, for example, inappropriate listing imposing unwarranted costs (such as denial of redevelopment opportunity) and possible perverse effects (such as destruction to avoid maintenance costs).

Draft Finding 5.5 refers to "unclear legislative requirements", however the Report effectively contradicts itself by referring to "an over-reliance on prescriptive regulation" in Draft Finding 7.5.

It needs to be understood that the community generally demands certainty, which can be provided through legislation.

Denial of redevelopment opportunity is not a 'cost'; it is merely not achieving a 'benefit'. Furthermore, local heritage listing does not prohibit redevelopment. Local heritage listing simply seeks development that is complementary to the local heritage item/s and the heritage values of the individual place.

The consequences of negotiated conservation agreements are far more likely to include demolition, as there will not be any legislative protection of the heritage items (as present).

With respect to the costs of heritage conservation, as referred to in Draft Finding 7.5, it is noted that the City of Holdfast Bay has an incentive grant scheme to assist property owners with maintenance and restoration costs for heritage-listed properties. This incentive scheme approach, which each level of government should be encouraged to adopt, demonstrates the City of Holdfast Bay's commitment to heritage conservation.

Draft Finding 7.7

The assistance available to private owners of heritage properties is poorly targeted, and in some cases, falls well short of the additional costs of obligations imposed on owners as a result of listing. In these circumstances, property owners will not have an incentive to actively conserve heritage values.

While owners of buildings not on the heritage list do not receive any financial assistance from the City of Holdfast Bay for any renovations or maintenance, this Council does provide some monetary assistance for external renovations/maintenance of locally-listed heritage buildings. This funding program is an incentive for the appropriate management and conservation of locally-listed heritage items.

While there may be anecdotal evidence of heritage listing affecting property values, there are numerous examples throughout metropolitan Adelaide that illustrate that areas either protected by Heritage Conservation Zones or Local Heritage Listing benefit over the longer term from increased property values, as these properties get conserved and become sought after.

Draft Finding 7.8

At the local government level, the management of heritage conservation under local planning schemes is not working well, primarily because of:

- ***The imposition of unclear and uncertain restrictions on property owners;***
- ***The failure to prepare a statement of significance for each place listed on a local list;***
- ***Inconsistent use and interpretation of heritage controls; and***
- ***The application of heritage controls to places that have little, if any, heritage significance in order to achieve other planning objectives.***

This Draft Finding is not considered accurate within South Australia, as the reasons for significance of a heritage item area detailed by the *Development Act 1993* and incorporated in any Plan Amendment Report for heritage listing and any Local Heritage List. For example, heritage reviews within the City of Holdfast Bay provide an analysis of the item, reference to the relevant criteria under the Act, the extent of the listing, and conservation recommendations. This is further supported by clear provisions within the City of Holdfast Bay Development Plan, which lists the requirements for development of a Local Heritage Place.

Furthermore, within South Australia, the Development Act does not allow for places without any heritage significance to be placed on a Local Heritage List, as the Act provides stringent criteria for listing.

Draft Recommendation 7.1

The Australian Government should phase out the Register of the National Estate for historic heritage purposes, beginning with the closure of the Register to any new nominations.

Draft Recommendation 7.2

State and Territory governments should remove any reference to the Register of the National Estate from their planning and heritage legislation and regulations.

Draft Recommendation 7.3

Those State governments that have specific legislation governing the operations of the National Trust should repeal such legislation.

No further Draft Recommendation identifies a 'replacement' system at the national level (although Draft Recommendation 9.1 does refer to a 'National List' but no further detail is provided).

Abolition of a national list of heritage properties (National Estate/Trust) is likely to gradually lead to the further erosion of any State and local heritage listing requirements.

Also, this approach does not appear consistent with the Report's previously espoused principle of 'subsidiarity' and the Federal Government being appropriately responsible for heritage items of national significance.

Draft Recommendation 7.5

State, Territory and local governments should:

- **Produce adequate conservation management plans for all government-owned statutory-listed properties; and**
- **Implement reporting systems that require government agencies and local governments with responsibility for historic heritage places to document and publicly report on the heritage-related costs associated with their conservation.**

The City of Holdfast Bay considers the preparation of conservation management plans and reporting systems for government-owned heritage-listed properties to be a responsible approach in the management and conservation of heritage items. However, Council would require additional resources (staff and funding) in order to prepare and implement such plans and systems, particularly if compliance is required within a short timeframe. It should be noted that the City of Holdfast Bay has been systematically working through the preparation and implementation of conservation management plans for heritage listed buildings, and undertakes this in accordance with an adopted Asset management approach. It should be noted that this is an ongoing process.

Draft Recommendation 8.1

Privately-owned properties should be included on a national, State, Territory, or local government statutory heritage list only after a negotiated conservation agreement has been entered into and should remain listed only while an agreement is in force.

In the City of Holdfast Bay, local heritage listing of a property is only proposed following comprehensive survey and research to establish the historical value and heritage significance. In consideration of such research, a voluntary approach to heritage listing is not considered a suitable approach for managing and conserving local heritage items.

The proposed negotiated agreements would provide landowners with the opportunity to 'negotiate' with the threat of demolition to obtain increased allowances (including monetary assistance) and/or design outcomes that compromise the heritage integrity of the item. As for most local governments, the City of Holdfast Bay would find this negotiation approach unfeasible as Council would not be able to proactively plan and budget for the outcomes and costs.

The Recommendation is unclear as to whether the conservation agreement would lapse through a change in land ownership. If so, Council would need to negotiate a new conservation agreement with each new owner, thus further increasing the costs to local government and their communities resulting from this Recommendation. The Recommendation's clause that a property be included on a heritage list "*only while an agreement is in force*" is weak and provides no assurance for heritage conservation.

The heritage value of a property does not alter according to ownership and it is not appropriate for the owners of heritage properties to be the arbiters of whether an historical property is on a heritage list.

Draft Recommendation 9.1

The Australian Government should implement processes whereby any additions of non-government owned properties to the National List occur only after a conservation agreement with the owner has been entered into, and that the property remain on the list only while an agreement is in force. Consistent with its stated reference of relying on agreements for the management of world and nationally significant historic heritage places, the Australian Government may wish to make this a statutory requirement under the Environment Protection and Biodiversity Conservation Act.

Draft Recommendation 9.2

State and Territory governments should modify heritage legislation to ensure that any additions of non-government owned properties to their statutory heritage conservation lists occur only after a conservation agreement with the owner has been entered into, and that the property remain on the list only while an agreement is in force.

Draft Recommendation 9.3

State governments should require their local governments to add non-government owned properties to a local heritage conservation list only after a conservation agreement with the owner has been entered into and remains in force.

If a property is considered of national or State heritage significance, it is highly questionable whether it should be subject to an agreement that can readily be reneged. Should the 'conservation agreement' approach be pursued, the agreement should, once negotiated, be binding on all subsequent owners of the property, as a change of ownership does not alter heritage value and an owner should not be the sole arbiter of the decision regarding heritage listing.

The City of Holdfast Bay objects to this Recommendation, as the recommended conservation agreements would not be binding, hence not providing for long-term protection and conservation of heritage items. Listing a property/item should be permanent following a thorough investigation in the Heritage Plan Amendment Report (PAR) process.

Heritage properties of national significance are already addressed and covered by provisions contained in the Environment Protection Biodiversity Conservation Act.

Draft Recommendation 9.4

State governments should put in place systems for their local governments to request compulsory acquisition in cases where this becomes the only way to ensure cost-effective conservation of places of local significance.

Local governments are unable to fund the implementation of this Recommendation, having regard for the initial purchase and the ongoing maintenance, etc. Notwithstanding that local government is not in the business of compulsory acquisition per se, it may find this Recommendation acceptable subject to the provision of sufficient Federal funding.

Draft Recommendation 9.5

Private owners of already listed properties, where the listing occurred after purchase of that property, should be able to apply for a negotiated conservation agreement and for listing to continue only if an agreement is reached.

This Recommendation is not acceptable, as landowners in such circumstances have evidently agreed to the listing if it occurred after purchase. The heritage value of a building/place/item does not change when ownership changes (although management of the heritage might alter).

Draft Recommendation 9.6

Private owners of already listed properties, where the listing occurred prior to the purchase of that property, would remain covered by the existing 'package' of restrictions and concessions (if any). These arrangements would be reassessed at the time of any substantive development application when negotiations for a new conservation agreement would occur and listing would continue only if an agreement is reached.

This Recommendation is not considered acceptable, as the landowners in such circumstances have evidently accepted the property with the heritage listing if it occurred prior to purchase. The heritage value of a building/place/item does not change when ownership changes. Development applications should complement the heritage value of the heritage item.

Draft Recommendation 9.7

State and Territory governments should modify their planning legislation and regulations to remove any requirement to take heritage considerations into account in relation to any individual property other than those requirements relating to zoned heritage areas.

The City of Holdfast Bay is opposed to this Recommendation, as significant sites may be located beyond the boundaries of zoned heritage areas. It is not feasible to place a heritage zone over the entire Council area. However, as it is important to retain individual heritage items, it is also desirable to retain historically significant streetscapes. This Recommendation would eliminate assessment guidance for the impact of new development on heritage items.

Draft Recommendation 9.8

State and Territory governments should remove the identification and management of heritage, zones, precincts or similar areas from their heritage conservation legislation and regulations, leaving these matters to local government planning schemes.

This Recommendation is contrary to the Report's previously espoused principle of 'subsidiarity', which supports South Australia's current heritage conservation framework, under which heritage places of State-significance are protected under the *Heritage Places Act 1993*. It is clarified that, in South Australia, places of local heritage significance are not listed in the State's legislation, instead regulated by the *Development Act 1993* and listed in local governments' Development Plans.

Further, this Recommendation is considered unacceptable because a lack of reinforcement by the State weakens a local government's position on heritage conservation, particularly in a Court matter.

Attachment 2

Holdfast Bay Conservation Guidelines:

- Extensions, Additions and Carports
- Fences and Gardens
- Glenelg Residential
- Shopfronts and Verandahs