

From: [REDACTED]
Sent: Fri, 23 Jan 2026 14:12:19 +1100
To: [REDACTED]
Subject: FW: Anonymous User completed Amendment C151

This document has been copied and made available for the planning process as set out in the Planning and Environment Act 1987. The information must not be used for any other purpose.

By taking a copy of this document you acknowledge and agree that you will only use the document for the purpose specified above and that any dissemination, distribution or copying of this document is strictly prohibited.

Hi [REDACTED]

FYI below.

[REDACTED]

Phone: [REDACTED]
Mobile: [REDACTED]



[Book time to meet with me](#)

From: Latrobe City Council <support@engagementhq.com>
Sent: Friday, 23 January 2026 2:06 PM
To: [REDACTED]
Subject: Anonymous User completed Amendment C151

⚠ EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe. ⚠

Anonymous User just submitted the survey Amendment C151 with the responses below.

Name

[REDACTED]

Email

[REDACTED]

Address

[REDACTED]

Contact number (if you would like Council to contact you)

[REDACTED]

Please select either to support, object or request a change be made to the draft document(s)

Request a change

Your submission

That's an incredible about of documents and text for what appears to be a review of "building" signage. There doesn't seem to be any focus on street signage, which is where the issue with local signage is. Sure everyone has a GPS these days, but everyday thing such as clarity and positioning of street name signage, as well as signage for our localities such as Lake Narracan for example are sorely lacking and have done so for the last 15 years in my witness. People go for drives, they investigate things based on visibility of signage. If there is no sign for Lake Narracan on the north side of the lake for example, people drive straight past. And you lose that tourism dollar that would otherwise stay, spend and invest.

This document has been copied and made available for the planning process as set out in the Planning and Environment Act 1987. The information must not be used for any other purpose.

By taking a copy of this document you acknowledge and agree that you will only use the document for the purpose specified above and that any dissemination, distribution or copying of this document is strictly prohibited.

FYI



[Book time to meet with me](#)

From: Latrobe City Council <support@engagementhq.com>

Sent: Friday, 23 January 2026 10:52 PM

To: Latrobe Central Email <LatrobeCity@latrobe.vic.gov.au>; [REDACTED]

[REDACTED]

Subject: Anonymous User completed Amendment C151

⚠ EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe. ⚠

Anonymous User just submitted the survey Amendment C151 with the responses below.

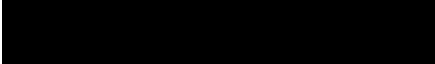
Name

[REDACTED]

Email

[REDACTED]

Address



Please select either to support, object or request a change be made to the draft document(s)

Request a change

Your submission

Not sure if this is the right place to ask or not but I believe the Newborough Yallourn Men's Shed Inc could use some tourist direction signage from top of Yallourn W Power Station heading to Newborough and from Yallourn North to direct people how to get to the location on Yallourn Drive. A few signs along Yallourn Drive could also help. This place will become a big community attraction.

04/02/2026

[REDACTED]

Dear [REDACTED]

RE: [REDACTED] TRARALGON COURT HOUSE, 161-165 FRANKLIN STREET TRARALGON, LATROBE CITY (H1488)

I write regarding your recent correspondence giving Heritage Victoria notice of Amendment C151latr which seeks to amend the Latrobe Planning Scheme in the following manner:

- Amend Clause 15 to add Clause 15.01-1L-01 *Signs*.
- Amend Schedule 1 and 2 to Clause 37.08 *Activity Centre Zone*.
- Amend Clause 72.08 *Background Documents*.

It is understood that the purpose behind Amendment C151latr is to implement the Latrobe City Signage Strategy 2025. There are no concerns or objections to the proposed changes within Amendment C151latr.

Please contact [REDACTED] or email [REDACTED] if you have further queries.

Yours sincerely

[REDACTED]

[REDACTED]

Heritage Victoria

From: [REDACTED]
Sent: Wed, 4 Feb 2026 13:03:55 +1100
To: "Latrobe City Council" <Latrobe@latrobe.vic.gov.au>
Subject: Attention Strategic Planning - Amendment C151latr (Signage Strategy) - Submission

⚠ EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe. ⚠

This message needs your attention

- This is their first email to you.

[Mark Safe](#) [Report](#)

Powered by Mimecast for Latrobe

Dear Sir/Madam

Thank-you for the opportunity to review the amendment C151latr (Signage Strategy).

The proposed changes have been well researched, are reasonable, provide guidance, consistency and improve social outcome for the LCC environs.

The increased qualitative wording will place onus on Planners to carefully consider planning submissions with due integrity and assessment balanced with overall impact and purpose.

Your sincerely

[REDACTED]

This document has been copied and made available for the planning process as set out in the Planning and Environment Act 1987. The information must not be used for any other purpose.

By taking a copy of this document you acknowledge and agree that you will only use the document for the purpose specified above and that any dissemination, distribution or copying of this document is strictly prohibited.

Subject: FW: Anonymous User completed Amendment C151
Date: Friday, 6 February 2026 3:14:37 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

FYI



 [Book time to meet with me](#)

From: [REDACTED]
Sent: Friday, 6 February 2026 3:02 PM
To: Latrobe Central Email <LatrobeCity@latrobe.vic.gov.au>; D [REDACTED]
[REDACTED]
Subject: Anonymous User completed Amendment C151

 **EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.** 

Anonymous User just submitted the survey Amendment C151 with the responses below.

Name

[REDACTED]

Email

[REDACTED]

Address

[REDACTED]

Contact number (if you would like Council to contact you)

[REDACTED]

Please select either to support, object or request a change be made to the draft document(s)

Your submission

I would like all or part of the Bert Christensen reserve to be re classified from a category 4 to a category 3. The reason being is this would allow the Tyers and District Community Association to replace our old township notice board with a New electronic sign board. Note There is power already to light the existing notice board. The existing Notice board has been installed for over 20 years and has been a dependable means of communicating vital and general information to the Tyers community and passing traffic. The benefits for our members is to allow ease of changing the Whats On in Tyers information. eg Tyers Primary School information, Anzac day details, Tyers Art Show, TTU footy games, CFA fire information, Vicroads road work details etc

From: [REDACTED]
Sent: Fri, 6 Feb 2026 07:34:39 +1100
To: "Latrobe Central Email" <LatrobeCity@latrobe.vic.gov.au>
Subject: WGCMA response for Planning Scheme Amendment C151 Signage Strategy
Morwell Vic 3840 Our ref: W [REDACTED]
Attachments: [REDACTED]
Categories: Blue Category

⚠ EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe. ⚠

OFFICIAL

Dear [REDACTED]

Response issued for Planning Scheme Amendment C151 Signage Strategy Morwell Vic 3840.

Your Ref: C151

Regards

Planning Administration

[REDACTED] Traralgon 3844

For any queries please contact;
Office Phone: [REDACTED]

www.wgcma.vic.gov.au Stay informed, [sign up to our mailing list](#).



I respectfully acknowledge the Traditional Owners of the Country upon which I work; their Elders past, present and future.

West Gippsland Catchment Management Authority, 16 Hotham Street Traralgon and Corner Young & Bair Streets Leongatha | PO Box 1374 Traralgon 3844 | 1300 094 262 for standard call cost | westgippy@wgcm.vic.gov.au | www.wgcma.vic.gov.au

This email (and any attachments) is for the intended recipient only. The information it contains may be confidential or sensitive. If you are not the intended recipient you must not reproduce or distribute any part of this email, disclose its contents to any other party, or take any action in reliance on it. If you have received this email in error, please contact the sender immediately and delete the message from your computer.



WGCMA Ref: [REDACTED]
Document No: 1
Date: 6 February 2026

[REDACTED]

Dear [REDACTED]

Regarding: Planning Scheme Amendment C151

I refer to your correspondence received at the West Gippsland Catchment Management Authority ('the WGCMA') on 22 January 2026 in relation to review of planning scheme amendment C151. The WGCMA understands that the amendment proposes to implement the recommendations of the Latrobe City Signage Strategy 2025. The strategy aims to provide clarity and details about the types of signage that will be supported.

The WGCMA is satisfied that the proposed amendment will not increase the flood risk and **does not object** to the proposed amendment.

Should you have any queries, please do not hesitate to contact [REDACTED] or email [REDACTED]. To assist the WGCMA in handling any enquiries please quote **WGCMA-F-2026-00068** in your correspondence with us.

Yours sincerely,

[REDACTED]
[REDACTED]

The information contained in this correspondence is subject to the disclaimers and definitions attached.

Definitions

1. **Annual Exceedance Probability (AEP)** is the likelihood of occurrence of a flood of given size or larger occurring in any one year. AEP is expressed as a percentage (%) risk and may be expressed as the reciprocal of Average Recurrence Interval.

Please note that the 1% probability flood is not the probable maximum flood (PMF). There is always a possibility that a flood larger in height and extent than the 1% probability flood may occur in the future.

2. **Australian Height Datum (AHD)** is the adopted national height datum that generally relates to height above mean sea level. The elevation is in metres.
3. **Average Recurrence Interval (ARI)** is the likelihood of occurrence, expressed in terms of the long-term average number of years, between flood events as large as, or larger than, the design flood event. For example, floods with a discharge as large as, or larger than, the 100 year ARI flood will occur on average once every 100 years.
4. **Finished Floor Level** is the level of the top layer of the floor. This is the layer of floor that you will see and walk on.
5. **Flood Resistant Materials** are materials used in building construction that are capable of withstanding direct and prolonged contact with floodwaters without sustaining significant damage. Some examples of this are concrete, metal, brick and some timber. Avoid using materials like carpet, plaster and some timber.
6. **Nominal Flood Protection Level (NFPL)** is the minimum height required to protect a building or its contents, which includes a freeboard above the 1% AEP flood level.

Disclaimers

1. The area referred to in this letter as the 'proposed development location' is the land parcel(s) that, according to the WGCMA's assessment, most closely represent(s) the location identified by the applicant. The identification of the 'proposed development location' on the WGCMA's GIS has been done in good faith and in accordance with the information given to the WGCMA by the applicant(s) and/or the local government authority.
2. While every endeavour has been made by the WGCMA to identify the proposed development location on its GIS using VicMap Parcel and Address data, the WGCMA accepts no responsibility for, or makes no warranty regarding, the accuracy or naming of this proposed development location according to its official land title description.
3. No warranty is made as to the accuracy or liability of any studies, estimates, calculations, opinions, conclusions, recommendations (which may change without notice) or other information contained in this letter and, to the maximum extent permitted by law, the WGCMA disclaims all liability and responsibility for any direct or indirect loss or damage which may be suffered by any recipient or other person through relying on anything contained in or omitted from this letter.
4. This letter has been prepared for the sole use by the party to whom it is addressed, and no responsibility is accepted by the WGCMA regarding any third-party use of the whole or of any part of its contents. Neither the whole nor any part of this letter or any reference thereto may be included in any document, circular or statement without the WGCMA's written approval of the form and context in which it would appear.
5. The flood information provided represents the best estimates based on currently available information. This information is subject to change as new information becomes available and as further studies are carried out.
6. Please note that land levels provided by the WGCMA are an estimate only and should not be relied on by the applicant. Prior to any detailed planning or building approvals, a licensed surveyor should be engaged to confirm the above levels.

7. The flood information in this letter is based on the most up-to-date flood mapping available. The WGCMA regularly reviews and updates flood mapping across our region. The Flood Overlay (FO) and Land Subject to Inundation Overlay (LSIO), which are managed by local councils, may not always reflect the latest mapping.

From: [REDACTED] >
Sent: Fri, 6 Feb 2026 17:35:43 +1100
To: latrobe@latrobe.vic.gov.au; [REDACTED]
Subject: Anonymous User completed Amendment C151

⚠ EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe. ⚠

Anonymous User just submitted the survey Amendment C151 with the responses below.

Name

[REDACTED]

Email

[REDACTED]

Address

[REDACTED]

Contact number (if you would like Council to contact you)

[REDACTED]

Please select either to support, object or request a change be made to the draft document(s)

Request a change

Your submission

I am a long time resident of Tyers and live adjacent to [REDACTED] in which the town community has a manually operated public notice board to highlight forthcoming events. I am also on the Baillie Reserve Committee of Management (Tyers Recreation Reserve) which currently uses the notice board to advertise home games and events at the Reserve for both TTU Football Netball Club and Tyers Soccer Club. The notice board is located to be visible from both

approaching traffic from Traralgon which might be going towards Walhalla and equally traffic approaching from Traralgon but heading towards Yallourn North. Currently Bert Christensen Reserve is zoned as category 4 for specific signage and my contention is that to upgrade and modernize the sign to an electronic one, Bert Christensen Reserve should be rezoned as category 3 to allow for the upgrading to go ahead. The current location is ideal for viewing the board safely before either going towards Walhalla or Yallourn North and if upgraded it would bring benefits above what the current noticeboard provides. The benefits would be as follows: less labor intensive as the notice could be changed remotely without the need for opening the board, arranging the letters and then securing the board; the notice could be done in real time such as advertising the football/netball/soccer result as soon as known to the operator; issue warnings such as from the local CFA/SES regarding road closures or total fire bans again in real time; highlight local events such as meetings, birthdays, marriages etc of members of our local community. I think it makes sense to upgrade the community noticeboard and use modern electronics as the means to advertise. The current site is known to all in our community and it makes sense to retain it. Therefore the location needs to be reclassified (category 4 to category 3) to allow this to proceed.

From: "Latrobe City Council" [REDACTED]
Sent: Fri, 13 Feb 2026 10:11:14 +1100
To: latrobe@latrobe.vic.gov.au; [REDACTED]
Subject: Anonymous User completed Amendment C151
Categories: Blue Category

⚠ EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe. ⚠

Anonymous User just submitted the survey Amendment C151 with the responses below.

Name

[REDACTED]

Email

[REDACTED]

Address

[REDACTED]

Contact number (if you would like Council to contact you)

[REDACTED]

Please select either to support, object or request a change be made to the draft document(s)

Request a change

Your submission

In line with the change to signage in latrobe city I am requesting that Yinnar have some event signage poles added at the entry points of the town. These can then be used to hang the signage to promote upcoming events instead of volunteers having to put star pickets up for every event.

Morwell has examples of these already and I attach a picture of those on this submission. Thanks for your time.

Or upload your submission

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/551f36008fd2910843825f9ebc309d8f482052b6/original/1770937798/fd92db24050c080bdc42221afba94fce_20260129_124150.jpg?1770937798

**MONSTER
TRUCKS**
**TRARALGON
RACECOURSE**
**7TH - 8TH
FEBRUARY.**



Submission 9

From: "Latrobe City Council" [REDACTED] >
Sent: Sat, 14 Feb 2026 20:39:51 +1100
To: latrobe@latrobe.vic.gov.au; [REDACTED]
Subject: Anonymous User completed Amendment C151

⚠ EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe. ⚠

Anonymous User just submitted the survey Amendment C151 with the responses below.

Name

[REDACTED]

Email

[REDACTED]

Address

[REDACTED]

Contact number (if you would like Council to contact you)

[REDACTED]

Please select either to support, object or request a change be made to the draft document(s)

Request a change

Your submission

Submission – Bert Christensen Reserve Signage, Tyers This submission is made on behalf of Tyers Fire Brigade in support of an amendment to Planning Scheme Amendment C151latr – Signage Strategy. Tyers Fire Brigade requests that the Signage Strategy be updated to include signage provisions at Bert Christensen Reserve, located on Main Road, Tyers. The existing community sign is situated on land zoned Public Park and Recreation Zone (PPRZ), which is

currently classified as a Category 4 – Sensitive Area under Clause 52.05. As a result, signage opportunities at this important community location are limited. We request that the Schedule to the PPRZ be amended to include Bert Christensen Reserve, Main Road, Tyers, within the list of Local Facilities. This amendment would allow Category 3 signage to be considered at the site, enabling the potential installation of an electronic community information sign at the existing location, subject to appropriate planning conditions. The provision of an electronic sign at this location would significantly enhance the ability to communicate emergency warnings, fire safety information, and critical community messages in a timely and effective manner. This would provide clear public benefit by supporting community safety, preparedness, and resilience, particularly during emergency events. Tyers Fire Brigade strongly supports this amendment and considers it an important improvement to local emergency communication infrastructure.

From: [REDACTED]
Sent: Tue, 17 Feb 2026 16:50:26 +1100
To: [REDACTED]
Subject: Anonymous User completed Amendment C151

⚠ EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe. ⚠

Anonymous User just submitted the survey Amendment C151 with the responses below.

Name

[REDACTED]

Email

[REDACTED]

Address

[REDACTED]

Contact number (if you would like Council to contact you)

[REDACTED]

Please select either to support, object or request a change be made to the draft document(s)

Object

Your submission

I have an issue with the Amendment C151 as i believe this is overreach on behalf of the planning instrument. Signage is what is required with any retail shop front, bulky goods or industrial business to help them survive in our economic climate. The signs are there to attract recognition and therefore business. The tide has turned on retail with online shopping, increased rates, land taxes, emergency services levies, electricity, insurances, wage increases to name a few. A

business needs to be able to erect their sign to match what they are wishing to achieve, under veranda signs for example, are needed as people walking down the street will not see a veranda edge sign unless they walk onto the road. and also saying that the front window needs to have visibility into the premises. Why? Parapet signs need to be within the building line. Why? No above veranda signs. Why? Not even able to sign the pillars between the windows. Why? I note that council approved a GAWK sign on the corner of Hotham and Franklin St that goes above the build line, is illuminated and a distraction to people driving through the roundabout, but apparently that's ok. There were objections but no response from council. This sign does not even represent the businesses that occupy the building. My take on this is that when Council starts paying the rent and rates of the property occupier, then Council can start requesting what signage they would like. The business owner is taking all the risk here with being in business and needs to do what is needed to make the business a success. This success employs people, keeps shops filled, Council rate income flowing, and the town vibrant. In Morwell for instance, we would be excited to have the shops filling with viable tenants that will need all the assistance to attract business to operate and become robust. Putting extra constraints on signage advertising, that they will desperately need, and more RED tape in the way, is not assisting the cause. It may create a few more council positions though.

23 February 2026

Strategic Planning

Latrobe City Council

Via website submission: Have Your Say Latrobe City Council

Dear Sir/Madam,

PLANNING SCHEME AMENDMENT: C151latr

1. INTRODUCTION

This submission is made by [REDACTED], who act on behalf of [REDACTED] [REDACTED] [REDACTED], located at [REDACTED] (herein referred to as the subject site). The subject site is located within Precinct 2 – Princes Highway and Station Corridor of the Traralgon Activity Centre Zone – Schedule 1 (ACZ1).

Nature and Scope of the Amendment

Amendment C151latr is a local amendment to the Latrobe Planning Scheme proposed by Latrobe City Council. Its primary purpose is to strengthen and expand signage policy within the scheme, primarily through the introduction of new local policy and amendments of existing controls, together with the addition of the *Latrobe Signage Policy* as a background document to the scheme. The amendment makes changes across two elements of the Latrobe Planning Scheme that are directly relevant to the subject site and this submission:

- Clause 15.01-1L-01 (Signs) – The amendment introduces an entirely new local policy provision. This provision has no existing counterpart in the scheme and creates new policy objectives, strategies and guidelines governing signage across the Latrobe municipality. The provision applies whenever a signage permit application is assessed against the Latrobe Planning Scheme.
- Schedule 1 to Clause 37.08 (Activity Centre Zone – Schedule 1, Traralgon Activity Centre)- The amendment makes targeted changes to the existing ACZ1 Schedule. The relevant changes include updated signage and lighting guidelines. Importantly, it does not seek to alter the sign category assignments set out in Section 9.0 of the ACZ1 Schedule, which continue to designate the majority of Precinct 2 as Category 1 for the purposes of Clause 52.05.

We appreciate the intent of C151latr to improve design outcomes across the Latrobe Planning Scheme. However, we have identified issues with specific provisions introduced by the proposed amendment relating to signage, on the grounds that they are overly prescriptive, internally inconsistent, lack adequate justification and in certain respects conflict with the proper exercise of discretion under the planning scheme.

This document has been copied and made available for the planning process as set out in the Planning and Environment Act 1987. The information must not be used for any other purpose.

By taking a copy of this document you acknowledge and agree that you will only use the document for the purpose specified above and that any dissemination, distribution or copying of this document is strictly prohibited.

This submission seeks specific redrafting of the relevant provisions, as set out in Section 4 below. We respectfully request that the Panel appointed to consider C151latr have regard to the matters raised herein.

2. BACKGROUND AND CONTEXT

The subject site is located within Precinct 2 of the Traralgon Activity Centre, which the Latrobe Planning Scheme recognises as the Princes Highway and Station Corridor. This precinct is characterised as an important commercial gateway into the Traralgon Activity Centre, with an identified role in:

- Reinforcing the presence of the town centre along the Princes Highway corridor;
- Supporting higher density residential and mixed use development; and
- Providing defined urban form that acknowledges its function as a key entry point to Traralgon.

In recognition of this gateway and commercial role, the planning scheme has historically applied a more permissive approach to signage and built form in Precinct 2 relative to more heritage-sensitive precincts. Fawkner Property's land and business operations rely on visible, commercially effective signage along the Princes Highway corridor to serve customers, tenants and maintain commercial viability.

The proposed C151latr amendment would introduce a new local policy at Clause 15.01-1L-01 dealing with signs, as well as amendments to the centre-wide design and development provisions at Clause 4.4 of Schedule 1 to Clause 37.08. We raise concerns about the interaction and cumulative effect of these provisions as they apply to the subject site within Precinct 2.

3. CONCERNS

3.1 Restrictions on Digital, Illuminated and Electronic Signs

The proposed amendment introduces, through Clause 15.01-1L-01, a general strategy to restrict digital, illuminated and electronic signs in urban areas *'that do not impact on amenity'*. This language is simultaneously vague and overly restrictive in its application. We raise the following concerns:

- The phrase *'that do not impact on amenity'* is internally ambiguous. Read literally, it could be interpreted as restricting only those signs that have no amenity impact, which is a reading that would make the provision largely meaningless. Alternatively, it could be read as a catch-all restriction on all digital, illuminated and electronic signage in urban areas. This ambiguity creates unneeded uncertainty for applications and decision-makers.
- Clause 4.4 of the ACZ1 Schedule includes a guideline to *'discourage illuminated electronic or digital signage that distracts road users or impacts pedestrian movement'*. This guideline, which is appropriately expressed as a discretionary consideration, provides a more proportionate

and workable mechanism than a blanket restriction and should be the primary operative control.

- For land within Precinct 2, which fronts the Princes Highway, classed as a major arterial road, illuminated and electronic signage plays a legitimate commercial and wayfinding function. Effective signage at appropriate scale and luminosity, which would thus not impact on the amenity of the precinct, would be consistent with the precinct's role as a gateway and commercial corridor.

We support controls that would prevent signage that would cause genuine amenity harm or traffic hazard. However, the current drafting of the ordinance associated with amendment C151latr is insufficiently targeted and risks creating a blanket discouragement of all electronic signage without adequate weight being given to the commercial and functional context of Precinct 2.

3.2 Major Promotion Sign Separation Requirement (1 kilometre minimum)

Clause 15.01-01L-01 introduces a strategy providing that major promotion signs should have a minimum separation of one kilometre from one another. We raise the following issues with this provision on the following grounds:

- The one kilometre separation requirement is arbitrary and does not consider the particular characteristics of the Traralgon Activity Centre or the Princes Highway corridor. No justification, evidence base or contextual analysis has been provided in the amendment documentation to support this specific distance threshold.
- The Traralgon Activity Centre is a compact urban centre. A one kilometre separation requirement, applied across the Activity Centre Zone, would in practice prevent any major promotion sign from operating within much of the defined activity centre boundary, without consideration of whether such a sign is appropriate in context.
- The provision is expressed as a 'strategy' in the local policy, yet its effect would operate as a near-absolute numerical metric. This is inconsistent with the role of local policy in providing guidance to the exercise of discretion, rather than functioning as a mandatory numerical control.
- No distinction is drawn between different precincts or land use contexts. A separation requirement that may be appropriate in a sensitive heritage precinct is disproportionate when applied to a major arterial road facing commercial corridor such as Precinct 2.

We submit that a separation requirement is not required for major promotional signage within Precinct 2 of the ACZ1.

3.3 General Integration and Subordination Requirements

Both Clause 15.01-1L-01 and the centre-wide provisions at Clause 4.4 of the ACZ1 Schedule include requirements that signage be '*integrated into built form*', '*subordinate to built form and site features*'

and '*not dominate the surrounding area*'. We raise the following concerns with the cumulative application of these requirements:

- The concept of signage being '*subordinate*' to built form is not defined. What constitutes subordination will vary considerably depending on the scale of the building, the type of business and the street context. Without guidance on how this concept is to be applied, the provisions create uncertainty for permit applicants and decision-makers.
- The requirement that sign structures '*not dominate the surrounding area or detract from the host site or building*' is similarly vague. In a commercial gateway precinct such as Precinct 2, larger format signage may be entirely appropriate and consistent with the character and commercial zoning of the area, yet the drafting of the proposed ordinance provides no basis for distinguishing between acceptable commercial signage and genuinely problematic signage.
- We note that Clause 4.4 of the ACZ1 Schedule already provides a detailed and context-sensitive set of signage and lighting guidelines specifically tailored to the Traralgon Activity Centre. The addition of a further layer of general local policy through Clause 15.01-1L-01 creates redundancy, without improving decision-making outcomes.

3.4 Redundancy with Existing Clause 52.05 Framework

A further and substantive concern with the signage provisions introduced by Amendment C151latr is that they are, in significant respects, redundant with the regulatory framework already established by Clause 52.05 of the Victoria Planning Provisions (VPPs). This redundancy creates further uncertainty for decision-makers, risks overriding the regulatory framework of the established signage category system by oblique means, and imposes compliance costs on applicants without any corresponding planning benefit. We expand on these concerns below.

a) Clause 52.05 already provides a comprehensive and calibrated framework for signage

Clause 52.05 is the state-wide particular provision governing signage across Victoria. It establishes a self-contained, category based system that determines, for every parcel of land, what signs are as-of-right, permit required, or prohibited.

Section 9.0 of Schedule 1 to Clause 37.08 already assigns sign categories to each precinct of the Traralgon Activity Centre – Category 1 to the majority of Precinct 2, Category 2 to other precincts, and Category 3 to sub-precincts 2B and 4A. That assignment is the mechanism by which the planning scheme has deliberately calibrated signage to local context. It has already distinguished between precincts.

The new provisions introduced by Clause 15.01-1L01 sit on top of this established framework as a further layer of policy, but without any statement of how they interact with or are intended to modify, Clause 52.05.

The sign category system established by Clause 52.05 is deliberate in its calibration. Category 1, which applies to the majority of Precinct 2, reflects a considered judgement that land in commercial gateway

locations should accommodate a relatively broad range of signage, either as-of-right or with a planning permit. That judgement is embedded within the planning scheme.

If the new local policy at Clause 15.01-1L-01 is read as imposing a general discouragement of digital and illuminated signs across all urban areas, which on the face it does, it effectively seeks to qualify or override the deliberate permissiveness of the Category 1 assignment for Precinct 2. However, it seeks to do this through policy language rather than through the proper instrument, which would be a change to the sign category itself or an express amendment to the permit requirement framework.

b) The redundancy creates interpretative uncertainty for decision-makers and cost for applicants.

Where a planning scheme amendment introduces provisions that say similar things to provisions already in force, decision-makers face a question: does the new policy add something new to the existing assessment framework, or does it merely restate it? If something new is added, the decision-maker must identify what that is, and how the new policy modifies the weight to be given to the established framework. If nothing new is added, the new policy is redundant.

Amendment C151latr is vague in its new provisions. The new Clause 15.01-1L-01 provisions introduce language regarding digital, illuminated and electronic signs, sign integration and sign subordination that is broadly similar to – but not precisely aligned with – the signage and lighting guidelines already contained in Clause 4.4 of the ACZ1 Schedule. No explanatory statement accompanies the amendment to clarify the relationship between these instruments or to identify what gap in the existing framework the new provisions are intended to fill. This silence leaves applicants and responsible authorities without guidance on how to reconcile them and creates a material risk of inconsistent decision-making across similar applications.

Where two instruments address the same subject matter in overlapping but imprecisely aligned terms, applicants bear a real and practical compliance cost. A signage planning permit application for a digital sign in Precinct 2 would now be required to address Clause 52.05, the Category 1 requirements, the signage and lighting guidelines at Clause 4.4 of the ACZ1 Schedule and the new provisions of Clause 15.01-1L-01. The last of these adds nothing that has not been captured by preceding instruments, but does require additional written justification in application materials, increases the prospect of permit conditions being applied on grounds that would have not been otherwise available for consideration, and exposes applicants to a broader and less defined basis for permit refusal. Where a policy provision is genuinely duplicative, that additional burden is not justified by any planning benefit.

4. PROPOSED REDRAFTING – CLAUSE 15.01-1L-01 (SIGNS)

For the reasons set out in Section 3 of this submission, we seek amendment of Clause 15.01-1L-01 in the respects described below. We do not prescribe the precise form of words to be adopted, recognising that drafting is a matter for the Council and the Panel. However, we submit that any revised provision should give effect to the following general directions.

4.1 Digital, Illuminated and Electronic Signs

The current policy guideline relating to digital, illuminated and electronic signs should be amended to:

- Resolve the internal ambiguity in the current drafting so that the provision operates with a clear and consistent meaning that can be applied predictably by decision-makers and applicants;
- Recognise that the appropriateness of digital, illuminated and electronic signs varies materially by land use context, and that in commercial locations such as the Princes Highway corridor, such signs may serve legitimate commercial, wayfinding and amenity functions;
- Frame the control as a discretionary consideration addressing amenity impact and traffic safety, rather than as a general restriction, so that it is consistent with the form and function of local policy under the Victoria Planning Provisions; and
- Be expressly reconciled with the sign category framework established under Clause 52.05 and the existing signage guidelines in the ACZ1 Schedule, so that the three instruments operate in a coherent and complementary manner.

4.2 Major Promotion Sign Separation

The strategy requiring a minimum one kilometre separation between major promotion signs should be amended to remove or substantially qualify the specific numerical threshold of one kilometre, which is not supported by any identified evidence base and is disproportionate in the context of a compact activity centre such as Traralgon.

4.3 Integration and Subordination Requirements

The integration and subordination requirements should be amended to:

- Replace the undefined concept of 'subordination' with guidance that can be consistently applied, having regard to the scale and character of both the subject site and the surrounding streetscape;
- Acknowledge that in commercial locations, signage of a scale commensurate with the commercial function of the site may be entirely appropriate and should not be characterised as dominating built form merely by virtue of its size or visibility; and
- Clearly delineate the relationship between Clause 15.01-1L-01 and the existing signage and lighting guidelines in Clause 4.4 of the ACZ1 Schedule, so that the two instruments complement rather than duplicate each other, and decision-makers are provided with clear guidance on how to apply them together.

5. CONCLUSION

We support the general objectives of Amendment C151latr in seeking improved signage and urban design outcomes across the Latrobe municipality and specifically the Traralgon Activity Centre.

However, for the reasons set out in this submission, the signage provisions introduced by the amendment are attended by four distinct issues, each of which warrants specific redrafting of the ordinance. In summary:

- The restriction on digital, illuminated and electronic signs in Clause 15.01-1L-01 is ambiguously drafted, insufficiently targeted and fails to give adequate weight to the legitimate commercial character of Precinct 2 as a designated gateway and commercial corridor.
- The one kilometre major promotion sign separation requirement is an arbitrary numerical metric unsupported by any identified evidence base, and is disproportionate in its application to a compact activity centre such as Traralgon.
- The integration and subordination requirements are expressed at a level of generality that provides no guidance to implementation, creates uncertainty for applicants and decision-makers and does not distinguish between commercial contexts where larger format signage is appropriate and those where it is not.
- The signage provisions of Clause 15.01-1L-01 are, in significant respects, redundant with the comprehensive framework already established by Clause 52.05 and the ACZ1 Schedule. This redundancy creates interpretative uncertainty, risks using broad local policy to transcend the deliberate calibration of the sign category system and imposes compliance costs on applicants without corresponding benefits.

We respectfully request that the Panel:

1. Accept the above submission and have regard to the grounds of objection identified herein;
2. Recommend specific redrafting of Clause 15.01-1L-01, including resolving the redundancy between that provision and the existing Clause 52.05 framework and the ACZ1 Schedule signage guidelines.
3. In the event that the Panel does not recommend removal or full redrafting of the redundant signage provisions, we would recommend that a clear statement of the relationship between Clause 15.01-1L-01 and the Clause 52.05 sign category framework is inserted into C151latr to guide consistent decision making.

Kind regards,

