

Panel Submission – Part B

Planning Scheme Amendment C151
Latrobe City Signage Strategy

Latrobe City Council
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Attachments

Attachment No.	Description
Attachment 1	Council Response to Submissions
Attachment 2	Changes in Response to Submission Table
Attachment 3	Planning Application Process

1. Introduction and Overview

1. Latrobe City Council (Council) is the Planning Authority for Amendment C151 (the Amendment) to the Latrobe Planning Scheme.
2. The *Latrobe City Signage Strategy (2025)* applies to land throughout the municipality of Latrobe City Council.
3. The Amendment introduces signage policy into Clause 15 and makes minor changes to Schedule 1 (Figure 1) and Schedule 2 (Figure 2) to Clause 37.08 Activity Centre Zone. The *Latrobe City Signage Strategy (2025)* acknowledges and references other character areas throughout the municipality.
- The character areas include:
 - Regional and Sub-regional Retail Centres;
 - Large Town Centres;
 - Neighbourhood and Local Activity Centres;
 - Small Town Centres;
 - Residential and Rural Areas;
 - Heritage Places; and
 - Major Promotion Signs.
4. On 24 July 2026 Council circulated its Part A submission to the Amendment in accordance with the Panel's directions. Part A contained:
 - a. Background to the Amendment including chronology of events;
 - b. A summary of the conditions of authorisation and how they have been met
 - c. A summary of the strategic context, including:
 - i. Relevant planning policies and provisions
 - ii. Any other recently approved or upcoming amendments that might impact on the Amendment
 - d. A summary of any permit applications or recently granted permits that might impact on the Amendment.
5. This is Council's 'Part B' submission to Amendment C151. The submission seeks to address the issues raised in direction eight (8) of the Panel's Directions including:
 - The policy and control duplication issues raised by Submitter 11 for signage
 - Its response to other submissions
 - The final position on the Amendment
6. This submission is primarily based on the 'proposed changes in response to submission table' and day 1 version of the Amendment documents as detailed in Part A of Council's submission.
7. This submission includes a set of Attachments that supports Council's position. The Attachments include:

- Attachment 1: Council Response to Submission Table
 - Attachment 2: Changes in Response to Submissions Table
 - Attachment 3: Planning Application Process
8. At the end of the hearing (scheduled for 31 July 2026) Council will present closing submissions. This will address:
- Council's response to any questions raised by the Panel throughout the hearing;
 - Council's response to any matters raised by submitters which require a response and;
 - Council's final position on Amendment C151 ahead of receiving the recommendations of the Panel.

2. Panel Directions

9. A Directions Hearing with submitters was held for Amendment C151 on 1 July 2026.
10. A letter of directions was provided to Latrobe City Council by the Panel on 1 July 2026.
11. Sections 3.2 – 4.0 of the Part B submission address the directions by the Planning Panel, which includes:
- Section 3.2 addresses the content requested in direction 8(a);
 - Section 3.3 and 3.4 addresses the content requested in direction 8(b); and
 - Section 4 addresses the content requested in direction 8(c).

3. Submissions received to Amendment C151

3.1 Summary of Exhibition

12. Amendment C151 was on Exhibition from 22 January 2026 to 23 February 2026. Council gave notice in accordance with the requirements of the Planning and Environment Act 1987.
13. Council received 11 submissions in relation to the Amendment. All submissions were considered by Council at the 25 May 2026 Council Meeting.
14. Refer to Council's Part A submission for further details in relation to the exhibition process.

3.2 Policy and Control Duplication Issues Raised

15. This section of Council's submission provides an expanded response to key themes raised by submissions and responds to direction 8(a).
16. Tables 1 and 3 provides an overview of the theme being responded to, the submissions in which the theme relates to and whether the Council officer's response resolved the concerns of the submitter(s).
17. Refer to Attachment 1 for a detailed description of Council's response to submissions.

3.2.1 Added Layer of Unnecessary Requirements at Clause 15.01-1L-01 Signs and Schedule 1 and Schedule 2 to Clause 37.08 Activity Centre Zones.

Table 1: Theme (i) Overview

Theme description	Submission	Is submission resolved with Council officer proposed response?
There is no clear connection to how the new policy introduced at Clause 15.01-1L-01 interacts with the established Clause 52.05-08 and Schedule 1 to Clause 37.08.	11	No, Council believes no changes are required as the proposed policy changes are there to support the unique character areas Latrobe City has and provide an additional level of context regarding sign guidelines.

18. Council refers to the directions hearing timetable presented on 1 July 2026 in which Direction 8(a) the policy and control duplication issue raised by Submitter 11 for signage must be addressed.
19. Council officers have completed a thorough review of Clause 15.01-1L-01 Signs against Schedule 1 and Schedule 2 to Clause 37.08 Activity Centre Zone and Clause 52.05-08 Decision guidelines. Noting there is similar wording of the policy guidelines highlighted below in Table 2:

Table 2: A comparison between Schedule 1 and Schedule 2 to Clause 37.08 Activity Centre Zone, Clause 52.05-08 and Clause 15.01-1L-01

Schedule 1 and Schedule 2 to Clause 37.08 Activity Centre Zone Signage and Lighting	Clause 52.05-08 Signs Before deciding on an application, in addition to the decision guidelines in Clause 65, the responsible authority must consider, as appropriate:	Clause 15.01-1L-01 Signs
General Strategies and Policy Guidelines		
Signage on the building façade must be limited, windows and doors should retain line of sight through glazing to ensure passive surveillance and an active interface with the streetscape.	- The relationship to the site and building: - The scale and form of the sign relative to the scale, proportion and any other significant characteristics of the host site and host building. - The extent to which the sign displays innovation relative to the host site and host building. - The extent to which the sign requires the removal of vegetation or includes new landscaping.	Strategy - Encourage signs that are integrated into built form and consider architectural or landscape features of the host building or site. Policy Guidelines Prioritise signage that does not obstruct the natural line of sight through windows. Strategy - Minimise the number and repetition of signs on a single site and streetscape. - Prioritise business identification signs as the main type of signage. Policy Guidelines - Limit the number of signs on a site through placement in strategic locations that present directly to the target audience.
The proportion and scale of signage should not detract from public view lines and views of the surround landscape.	- The character of the area including: - The sensitivity of the area in terms of the natural environment, heritage values, waterways and open space, rural landscape or residential character. - The compatibility of the proposed sign with the existing or desired future character of the area in which it is proposed to be located.	Strategy - Avoid signs that will impair the movement, visibility and functionality of the public realm and infrastructure. Policy Guidelines - Encourage the appearance, size, illumination and other aspects of signs to complement the building, or site on which they are displayed and not detract

	◦ The cumulative impact of signs on the character of an area or route, including the need to avoid visual disorder or clutter of signs. ◦ The consistency with any identifiable outdoor advertising theme in the area.	from the character of the surrounds.
• Avoid signage that impact the movement of active transport.	• The impact of any illumination: ◦ The impact of glare and illumination on the safety of pedestrians and vehicles. • The impact on road safety. A sign is a safety hazard if the sign: ◦ Is at a location where particular concentration is required, such as a high pedestrian volume intersection.	Policy Guidelines • Avoid signs that are a distraction and/or impact on movement and/or sight lines of active transport, road users and rail corridors.
• Discourage sign structures that interfere with streetscape views or building features.	• The effect of the proposed major promotion sign on: ◦ Significant streetscapes, buildings and skylines. ◦ The visual appearance of a significant view corridor, viewline, gateway location or landmark site identified in a framework plan or local policy. ◦ Residential areas and heritage places. ◦ Open space and waterways. • The impact on road safety. A sign is a safety hazard if the sign: ◦ Could dazzle or distract drivers due to its size, design or colouring, or it being illuminated, reflective, animated or flashing.	Strategy • Avoid digital, illuminated and electronic signs in urban areas that impact on amenity. Policy Guidelines • Support digital, illuminated and electronic signs in urban areas that: ◦ Maintain views and vistas along streetscapes; ◦ Minimise visual distraction and saturation of advertising in public areas; ◦ Retain trees and high quality landscaping; ◦ Retain architectural elements and features; ◦ Minimise disturbance and impacts on places of heritage significance; and

		◦ Are sited away from CBD gateways, town gateways and/or tourism gateways.
Heritage Places		
Not Available	• The character of the area including: ◦ The sensitivity of the area in terms of the natural environment, heritage values, waterways and open space, rural landscape or residential character.	• Discourage buildings being painted in corporate colours. • Discourage buildings and works related to signs that may damage or alter beyond repair of the significant building fabric or features. • Avoid sign structures that detract from heritage features and values. • Avoid digital, illuminated and electronic signs. • Avoid colours that appear in contrast of the heritage features of the building or place.
Major Promotion Signs		
Not Available	• The effect of the proposed major promotion sign on: ◦ Significant streetscapes, buildings and skylines. ◦ The visual appearance of a significant view corridor, viewline, gateway location or landmark site identified in a framework plan or local policy. ◦ Residential areas and heritage places. ◦ Open space and waterways. • When determining the effect of a proposed major promotion sign, the following locational principles must be taken into account: ◦ Major promotion signs are encouraged in commercial and industrial locations in a manner that	Strategies • Discourage major promotion signs that may restrict the development potential of a site. • Encourage signs that are incorporated into the built form over freestanding sign structures. • Avoid major promotion signs that interface with sensitive land use areas. Policy Guidelines • Discourage more than one major promotion sign at any intersection. • Provide a minimum of 800 metre separation between major promotion signs on the same road; and • Support major promotion signs within 800 metres on the same street if they are within regional and sub-regional centres and

	complements or enhances the character of the area. ◦ Major promotion signs are discouraged along forest and tourist roads, scenic routes or landscaped sections of freeways. ◦ Major promotion signs are discouraged within open space reserves or corridors and around waterways. ◦ Major promotion signs are discouraged where they will form a dominant visual element from residential areas, within a heritage place or where they will obstruct significant viewlines. ◦ In areas with a strong built form character, major promotion signs are encouraged only where they are not a dominant element in the streetscape and except for transparent feature signs (such as neon signs), are discouraged from being erected on the roof of a building.	activate an existing blank wall, provided they are fixed to a building, wholly within the built form and do not project outside of the building footprint.
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20. Submitter 11 raised issues with the duplication of proposed policy at Clause 15.01-1L-01 with current policy at Schedule 1 to Clause 37.08 Activity Centre Zone and Clause 52.05 Signs. Council does not believe there is duplication of this policy but rather complements the existing provisions of signage in the Scheme.
21. It is important to understand what the purpose of an activity centre zone is and how the provisions within the Activity Centre Zone interact with local policy. The *Planning Practice Note for Activity Centre Zone, 2015 (PPN 56) p.1* highlights that point four (4) is, 'To create good urban design and attractive, pleasant, walkable, safe and stimulating environment.' Acknowledging that these guidelines should be drafted through background reporting of an urban design report.
22. Furthermore, an Activity Centre Zone must include design and development requirements, as identified in Ministerial Direction Section 7(5) noting Design and development requirements

are considered at Schedule Sub-section 4.4.

23. When considering the elements that support ‘good’ design and development, Yun and Jongsoo, 2023 regard signboards as a significant element of the urban landscape, showcasing the regional characteristics and identity of a municipal region or city.
24. In addition to the role of the ACZ, Officers can comment on how zones and local provisions interact with each other, generally. Considering the *Practitioners Guide to the Victoria’s Planning Schemes (2025) p.78*, zones... are the primary implementation mechanism of the strategic policy directions of a planning scheme. Where a zone... provides all the direction required to make a decision, a local policy is not needed.
25. Concluding these remarks, local policy introduces a nuanced approach to assessing an application against the Scheme. Where Particular Provisions, specifically at Clause 52.05-08 Signs provide a State context for signs, the proposed local provisions at Clause 15.01-1L-01 Signs ensures decision makers and applicants know exactly what signs are encouraged in the referenced character areas.
26. Officers note, Clause 15.01-1L-01 introduces local policy guidelines with a quantitative metrics to assess signage, as well as strategies which target the specific character of Latrobe City. In addition to the introduced policy, it is noted policy guidelines are considered after zone, and local strategy provisions have been considered.
27. Furthermore, the clear policy provisions and *Latrobe City Signage Strategy (2025)* eliminates the ambiguous nature of Clause 52.05 Signs as it does not support a local context.
28. Council officers strongly support the provisions introduced through Clause 15.01-1L-01 and are necessary to provide guidance to other commercial areas, including Schedule 2 (Morwell Activity Centre) to Clause 37.08 Activity Centre Zone, Commercial 1 Zone (C1Z), Commercial 2 Zone (C2Z), Township Zone (TZ) and the Mixed Use Zone (MUZ). In addition to supporting the other commercial land uses, the introduced policy provides clarity on the size and location of signage.
29. In addition, the Township Zone (TZ), acts in a similar way to Commercial 1 Zone (C1Z) in the smaller town centres and therefore guidance in Clause 15.01-1L-01 Signs is required to support the character of these areas.
30. Council officers note, there is guidance to establish Neighbourhood and Local Activity Centres identified at Clause 02.04 Retail Centre Hierarchy.
31. In addition to the retail hierarchy at Clause 02.04, Latrobe City has other activity centres at Clause 11.01-1L, including Boolarra (02), Churchill, (03), Glengarry (04), Moe-Newborough (05), Morwell (06), Toongabbie (07), Traralgon (08) and Tyers (09), and further guidance at Clause 11.03-1L for the larger activity centres.

32. There is further guidance on future local activity centres at Clause 11.01-1L-06 Morwell, where there is a proposed Planning Scheme Amendment for a Local Activity Centre at Heritage Boulevard, Morwell, part of the Morwell North West Development Plan, north of the Morwell Activity Centre. There is also guidance for an Activity Centre in Clause 11.03-2L which is currently being considered under Amendment C152 for land commonly known as 'Hollydale'.
33. As such, the policy in Clause 15.01-1L-01 will help guide development in these areas, particularly as new activity centres are likely to be zoned C1Z but the signage strategy has identified a different character for local activity centres when compared to Sub-Regional centres in the same zone.
34. Officers agree that there is an overlap of policy between Schedule 1 and 2 to Clause 37.08 and the proposed Clause 15.01-1L-01 Signs, however the proposed policy guidelines provide a general requirement across all areas in the municipality and are there to support decision-makers when assessing an application outside of the Activity Centre Zone. Accordingly, further context is provided at Schedule 1 and 2 to Clause 37.08 noting that the Activity Centre Zones have a unique character.
35. In addition, Officers note Clause 52.05-08 and Schedule 1 to Clause 37.08 Activity Centre Zone does not provide specific guidance on Major Promotion Signs. Clause 15.01-1L-01 will introduce specific Policy Guidelines relating to a separation distance of 800 metres and details regarding the preferred look, and placement of Major Promotion Signs.
36. Furthermore, Clause 15.01-1L-01 will enhance the strategic purpose of gateway locations in the Traralgon Activity Centre identified through the approval of Amendment C106latr Traralgon Activity Centre Plan and the introduction of Schedule 1 to Clause 37.08 Activity Centre Zone.
37. Council officers have completed a thorough review of Clause 52.05 and believe that these provisions provide guidance on how to assess the introduced policy at Clause 15.01-1L-01 Signs. In addition, the new policy will support the identified character areas, noting further comments are provided at Section 3.3.2.
38. Council officers believe that the new policy at Clause 15.01-1L-01 will support the identified character areas and note further comments are provided below in Section 3.2.2.
39. Officers believe the new policy does not duplicate the sign requirements identified at Clause 52.05-08 and Schedule 1 to Clause 37.08 Sub-section 4.4 Signage and lighting and no further changes are required. Please refer to Attachment 2 for changes in response to the submission table for further details.

3.2.2 Added Layer of Unnecessary Requirements at Clause 15.01-1L-01 Signs and Particular Provision Clause 52.05 Signs

Table 3: Theme (ii) Overview

Theme description	Submission	Is submission resolved with Council officer proposed response?
There is no clear connection to how the new policy introduced at Clause 15.01-1L-01 interacts with the established Clause 52.05-08.	11	No, Council believes no changes are required as Clause 52.05 does not provide a local context for how to assess a sign application. Clause 15.01-1L-01 will provide a local context by supporting eight (8) identified character areas.

40. Submitter 11 noted the redundancy of Clause 15.01-1L-01 Signs where a comprehensive framework is already established at Clause 52.05-08 Signs and Schedule 1 (Traralgon Activity Centre) to Clause 37.08 Activity Centre Zone.
41. Officers note that the *Latrobe City Signage Strategy (2025)* identifies a range of issues and opportunities across each of the identified eight (8) character areas and highlights a gap in the Latrobe Planning Scheme in local provisions as is identified in the *Latrobe City Signage Review (2025)*. Amendment C151latr presents an opportunity to amend the Scheme to provide clear direction for planning permit applicants and support a more streamlined assessment process.
42. While Clause 52.05-08 provides general guidance for decision-making, it does not differentiate between the municipality's distinct character areas. As a result, signage that may be acceptable in one location may be inappropriate in another location. Officers consider the proposed policy in Clause 15.01-1L-01 necessary to support clear, encouraged and preferred signage outcomes across the municipality.
43. This is supported by the recent VCAT case, *FSST Pty Ltd v Port Phillip CC [2026] VCAT 426 (15 June 2026)* paragraph 71 notes, 'acknowledged that the site is within the major activity centre, within tourism/entertainment precinct, surrounding the St Kilda foreshore, and the proposed sign can be considered to create visual interest. Policy (15.01-1L-01 Signs) specifically discourages major promotion signs in locations where they are visible from the Port Phillip foreshore...'
44. Officers believe that new policy at Clause 15.01-1L-01 in the Latrobe Planning Scheme is there to support gaps when considering a signage planning permit under Clause 52.05 Signs where local provisions can adds value.

45. In addition to Submitter 11's concerns regarding redundant policy, Officers note that the current Traralgon Activity Centre Plan is due to be reviewed in 2028, and the Morwell Activity Centre Plan is due to be reviewed in 2030. Considerations for signage and how it interacts with the Urban Design Guidelines (2021) and built form of Traralgon and Morwell will be highlighted in the updated Plan.
46. Council does not intend to amend the current and introduced provisions in Schedule 1 to Clause 37.08 or Schedule 2 to Clause 37.08, as the intent of Amendment C151 was to ensure that the proscribed wording was consistent with the *Latrobe City Urban Design Guidelines (2021) - For Commercial Development*, not to change the preferred urban form that has been identified in Plan, as a more comprehensive review is required for these changes.
47. In addition, officers acknowledge that there are similarities in both layers of Policy, however, note that in Schedule 1 (Traralgon Activity Centre) and Schedule 2 (Morwell Activity Centre) to Clause 37.08 Section 9.0 (Signs), the Activity Centre Zone does not trigger a planning permit and directs decision makers to use Clause 52.05 (Signs). It does this by specifying the sign category for each precinct or sub-precinct.
48. Additionally, when assessing a sign permit, a decision maker is referred, initially, to the appropriate zone, and any planning permit triggers an application may have. Then a robust understanding of any particular provisions, in this case Clause 52.05, is used to determine if a sign is suitable or not.
49. Under Schedule 1 and Schedule 2 to Clause 37.08 a sign will not trigger the need for a planning permit unless a permit is required under Section 4.3 (Buildings and works) to construct a building or undertake works. An alteration to an existing building façade provided:
 - At least 80 percent of the building façade at ground floor level is maintained as an entry or window with clear glazing.
50. Where this provision applies the permit assessment will consider the Signage and Lighting Guidelines contained in Schedule 1 and Schedule 2 to Clause 37.08 Activity Centre Zone, Sub-section 4.4 (Design and Development). Officers note that the requirements of the zone take precedence and should be addressed before local policy is considered, with local policy serving only to provide additional context as identified in the *Practitioners Guide to Victorian Planning Schemes (2025)* p.78. See Attachment 3 which provides guidance of how a sign planning permit application is generally assessed at Latrobe City Council.
51. Officers believe rather than adding an unnecessary layer of policy, Amendment C151latr will complement the permit triggers of Clause 52.05 and in some cases Schedule 1 and Schedule 2 to Clause 37.08 Activity Centre Zone.

3.3 Council's response to submissions – Submitter 11

52. Council's response to submissions is documented in Attachment 1 to Council's Part A submission previously circulated to all parties.
53. This section of Council's submission provides an expanded response to key themes raised by Submitter 11 and responds to Direction 8(b) by the Planning Panel.
54. Tables 4 - 9 provides an overview of the theme being responded to, the submissions in which the theme relates to and whether the Council officer's response resolved the concerns of the submitter(s).
55. Refer to Attachment 1 for a detailed description of Council's response to submissions.

3.3.1 Terminology and Wording of 'Amenity'

Table 4: Theme (iii) Overview

Theme description	Submission	Is submission resolved with Council officer proposed response?
The terminology of amenity is ambiguous.	11	No, Council officers have redrafted the term 'amenity' to include guidance on what how amenity will be assessed.

56. Submitter 11 raised concerns over the phrase, 'that do not impact on amenity,' which is contained in Clause 15.01-1L-01 Signs, 'is ambiguous and could literally be interpreted as restricting those signs that have no amenity impact, which is a reading that would make the provision largely meaningless.'
57. Submitter 11 notes it could also 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.
58. Council officers agreed that the wording of amenity can be read as ambiguous, noting redrafting of this phrase was needed. Council officers completed a thorough review of the Policy and analysed the *Practitioners Guide to the Victorian Planning Scheme (2025)* to provide a clear, and more positive framing of the term 'amenity.'
59. In addition, council officers acknowledge that the term 'avoid' was a negative term, which could be misinterpreted as 'avoid' all, and going against the more discretionary nature of Strategies. It has been used as a conclusive verb to give more clarity in the planning permit process in accordance with the verb list in the Practitioner's Guide to Victoria's Planning Schemes – Appendix 2.
60. In addition to the terminology surrounding 'amenity' and 'avoid' terminology, Council officers

referred to the *Urban Design Context Report (2010)* produced by Hansen Partnership to support the Traralgon Activity Centre Plan – Part 1 (2010).

61. Council officers note, the Report at Section 3.3 Landscape and Topography p.13, refers to laneway views are often partially interrupted by...signage and other obstacles.
62. In addition to specific reference to signage, the Report Section 6 – Issues and key opportunities, notes, 'Define and consolidate edges to Princes Highway and identify entry points into the activity centre.' Where, *'entrances to the activity centre should reinforce a sense of arrival and pick up upon the desired urban image of the town.'*
63. Furthermore, council officers benchmarked similar local provisions and found that the Rural City of Wangaratta and the City of Warrnambool use similar phrasing around avoiding particular signage in their general sign strategy. For instance, at Clause 15.01-1L-02 of the Warrnambool Planning Scheme, under Strategies, *'Encourage signs that are consistent with the character of the area.'*
64. The Wangaratta Scheme under Clause 15.01-1L-01 (Signs) – Major Promotion Signs, *'Avoid major promotion signs at gateway approaches, adjoining local and regional tourist routes...'*
65. Council officers believe that Warrnambool and in particular, Wangaratta share a similar rural urban environment to that of the Traralgon Activity Centre.
66. Council officers amended Clause 15.01-1L-01 (Signs) to read: *Avoid digital, illuminated and electronic signs in urban areas that impact on amenity.* This policy point was moved to a general strategy from a policy guideline, as officers believed this was more general in nature, responding to all urban areas of the municipality and directly supported the Policy Objectives.
67. Council officers also acknowledged there was limited understanding of what signage should be discouraged and would impact on 'amenity'. Officers inserted a new policy guideline in response to Submitter 11's concerns:
 - *Support digital, illuminated and electronic signs in urban areas that:*
 - *maintain views and vistas along streetscapes;*
 - *minimise visual distraction and saturation of advertising in public areas;*
 - *retain trees and high-quality landscaping;*
 - *retain architectural elements and features;*
 - *minimise disturbance and impacts on places of heritage significance; and*
 - *sighted away from gateways, town gateways and/or tourism gateways.*
68. Council officers would like to note that the Day 1 version needs to be updated to read as *'sighted away from activity centre gateways, town gateways and/or tourism gateways.'*
69. The Activity Centre Plans generally address these criteria and provide guidance on where these should be considered.

70. The Town Structure Plans also provide guidance on where town gateways are located. Noting that four of Latrobe's small towns are yet to have a structure plan prepared.
71. Council officers believe we have addressed Submitter 11's concerns, as officers deem the proposed ordinance provides more clarity and guidance on the qualitative aspects of the decision guidelines outlined in Clause 52.05. As such, officers believe that the proposed Day 1 version is appropriate with the exception of the abovementioned drafting error.

3.3.2 Schedule 1 to Clause 37.08 Sub-section 4.4 Provides More Guidance

Table 5: Theme (iv) Overview

Theme description	Submission	Is submission resolved with Council officer proposed response?
Generally, Schedule 1 to Clause 37.08 Sub-section 4.4 provides more guidance than the proposed insertion of Clause 15.01-1L-01 Signs.	11	No, council officers did not believe the introduced local policy at Clause 15.01-1L-01 provided less guidance than sub section 4.4, but supported it through identifying general policy that included Activity Centre Zones, Commercial 1 Zones and Township Zones. Therefore, Council believes no further changes are required.

72. Submitter 11 noted Schedule 1 (Traralgon Activity Centre) to Clause 37.08 Sub-section 4.4 includes a guideline, 'discourage illuminated electronic or digital signage that distracts road users or impacts pedestrian movement,' and is appropriately expressed as a discretionary consideration, and provides a more proportionate and workable mechanism than a blanket restriction, and should be the primary operative control.
73. Latrobe City officers note that while the submitter refers to Sub-section 4.4, the strategy referred to in Submission 11 appears in sub sections 5.1-4 and 5.2-4.
74. The *Latrobe City Signage Review (2025)* highlights multiple areas within Latrobe City which identify electronic and illuminated signs as being an issue, where the Review confirmed, *'Electronic and illuminated signs were not considerate of the surrounding sensitive uses.'*
75. *'Large electronic and illuminated signs especially at pedestrian level dominate areas that are featured, resulting in a detrimental impact to the surrounding area'* was also identified as an issue in the Review.
76. It is noted that Regional and Sub-regional Centres includes multiple zones including Schedule

1 and Schedule 2 to Clause 37.08 Activity Centre Zone (ACZ1 and ACZ2) as well as Clause 34.01 (Commercial 1 Zone).

77. Latrobe City's urban areas are covered by Schedule 1 and Schedule 2 to Clause 37.08 ACZ1 and ACZ2 and Schedule 1 to Clause 34.01 Commercial Zones (Moe, Midvalley and Churchill), which supports the need for a broad strategy for digital and illuminated signs at Clause 15.01-1L-01.
78. The Review highlighted that Major Promotion Signs, as a form of illuminated, electronic or digital signage, are located at many entry points into the townships, which takes away from the character. The Review notes, *'Whilst these locations may be ideal for advertising due to the volume of possible audience, the pride in how a town is presented at key entry points should be preserved.'* This is discussed more in section 3.3.3.
79. Officers acknowledge that the signage provisions at Schedule 1 to Clause 37.08 Sub-section 5.1 – 4 provide guidance when a sign application triggers a permit under the zone. This is supported by the following VCAT cases:
- *National Trust; Booth v Strathbogie SC* [2023] VCAT 782;
 - *Kiyagan v Baw Baw SC* [2025] VCAT 206.
80. While a zone continues to apply to the land and remains relevant to the overall assessment of a permit, is specifically triggered by a particular provision, the discretion is primary informed by the purpose and decision guidelines of that provision. In that sense, the particular provision may operate as the dominant planning control for the issue before the decision maker.' It is also noted that:
- A sign application is only triggered under Schedule 1 to Clause 37.08 Activity Zone, if Section 4.3 Buildings and works triggers for alterations on shopfronts where, *'if over 80 percent of the building façade at ground floor level is maintained as an entry or window with clear glazing.'*
 - In most cases, when Section 4.3 Buildings and works do not trigger for Clause 37.08 Activity Centre Zone, decision makers must rely on the State Policy of Clause 52.05, which does not offer local guidance for signage.
81. As the permit trigger for signage often sits within Clause 52.05, Clause 15.01-1L-01 is then used to provide guidance to assess the planning permit.
82. Officers note that Local Policy is supported through the Traralgon Activity Centre Plan, which was adopted in 2019, specifically notes Precinct 2 as being a 'key' town gateway on Page 25 of the Plan. In addition, Schedule 1 to Clause 37.08 does not provide specific local provisions for town gateways, only stating, 'the visual appearance should be taken into consideration' at 52.05-08 Major Promotion Signs, therefore it is required to meet the objectives outline in the

Plan. Township gateways are discussed below in Section 3.3.3.

83. Officers refer to Major Promotion Signs as Submitter 11 has a current planning application 2025/240 (Post Office Place and Princes Highway) for a Major Promotion Sign, and by definition at Clause 73.02, a Major Promotion Sign is 18 square metres or greater.
84. As Council has provided further clarification regarding why Clause 15.01-1L-01 Signs is required Council officers it is not believed any changes are needed as the local policy is there to complement the planning triggers at Clause 52.05 and Schedules 1 and 2 to Clause 37.08 Activity Centre Zone.
85. Officers believe that there is some merit in further considering whether the signage provisions are required in the Activity Centre Zone schedules. However, as the Traralgon Activity Centre Plan is due for review in 2028 and the Morwell Activity Centre plan in 2030, officers believe it is appropriate to wholistically review the plan and any impacts that the changes to signage may have on the character of the different precincts at that point in time.

Council officers note Submitter 11 did not support the addition of amenity impacts at Clause 15.01-1L (Signs) and provisions at Schedule to Clause 37.08 Activity Centre Zone (ACZ1) Sub-sub clause 4.4 *'Discourage illuminated electronic or digital signage that distracts users or impacts movement,'* were more appropriate and should be the 'primary operative control'.

3.3.3 Gateways and Township Entries

Table 6: Theme (v) Overview

Theme description	Submission	Is submission resolved with Council officer proposed response?
Effective signage at the appropriate scale which would not impact on amenity would be consistent with the role of Precinct 2 as a gateway and commercial corridor.	11	No, officers believe Precinct 2 of the Traralgon Activity Centre holds a legitimate character area of gateway entry to Traralgon and therefore does not believe further changes are warranted.

86. Submitter 11 notes land within Precinct 2 of the Traralgon Activity Centre which is along a major arterial road (Princes Street), illuminated and electronic signage plays a legitimate commercial and wayfinding function.
87. Submitter 11 also notes effective signage at an appropriate scale and luminosity, which would thus not impact on the amenity of the precinct, would be consistent the precinct's role as a gateway and commercial corridor.

88. Officers note effective digital, illuminated and electronic signage does have a purpose in commercial areas, however the *Latrobe City Structure Plans Background Report (2007)*, identifies the eastern gateway '*(Precinct 2 area) as a gateway for both Traralgon and the Latrobe Valley, the immediate term focus on the eastern gateway of Traralgon is to beautify the eastern entrance and implement traffic calming measures...*'
89. Officers note the *Traralgon Activity Centre Plan (2019)* also identifies Precinct 2 along the Princes Highway as, '*Town centre identifying art/gateway, in which: development at gateway locations and key development sites should be of high quality-distinctive and emphasise the importance of their corner location to act as a local landmark.*'
90. Other Town Structure Plans and Activity Centre Plans in the Latrobe Planning Scheme identify gateways for the respective town or primary activity centre in Clause 11.01-1L and Clause 11.03-1L.
91. The entries to the urban areas of the Latrobe City are of vital importance to the 'image of the city' and the establishment of the character of the city in the minds' eye of those who visit and live in the city. In establishing a positive image for the city, it is important to remember that 'first impressions count'.
92. Officers note this corridor should retain its gateway status and provide clear and distinct arrival information to support the Traralgon Activity Centre Plan (2019) objectives. The Plan was endorsed by Council on 13 November 2017.
93. In addition, a comprehensive review of other planning schemes, particularly of Regional Cities, and their corresponding background reports was performed. Wangaratta introduced the *Comprehensive Signs Policy (Rural City of Wangaratta 2002)* into the Scheme through Amendment C46wang Gazetted on March 27, 2014. The research notes on p.11, '*Limited opportunities may exist for panel signs in business... areas where they will not detract from the visual character of an area – such as on the side of walls of buildings in locations where they will not be visually intrusive, and where they will not be visible from more visually sensitive areas.*'
94. The Wangaratta Sign Policy supported local provisions in the Scheme at Clause 15.01-1L-01 Signs – Major Promotion Signs, '*Avoid major promotion signs at gateway approaches, adjoining local and regional tourist routes, or displayed on items of local and state heritage significance.*'
95. Furthermore, the City of Warrnambool Scheme introduces provisions for gateways at Clause 15.01-1L-01 (Signs), '*Major Promotion Signs must not be located in an identified gateway,*' which was supported through the Advertising Signage – Background Report (2019). The Policy notes, '*Major Promotion Signs should be 'avoided' in identified gateways...*'
96. To further support the strategic justification of discouraging digital, illuminated and electronic

signs at gateways, officer note Traralgon will have a similar population to Warrnambool (32,000) by 2035, (Forecast id, 2026), in which the current *Latrobe City Signage Strategy (2025)* will be updated as per *Strategic Document Review Program* updates to the Scheme.

97. Council officers note that the City of Ballarat has guidelines in the *Ballarat Advertising Sign Guide (2013)* p. 15, specifically when referring to town entries: *‘Attractive entries to the urban centres need to be encouraged to ensure that the marketability and character of the places are not compromised. The Clear definition of retail and other significant places can be achieved in a number of ways apart from the extensive use of advertisements including large and obtrusive pole signs or panel promotion signs’*.
98. This is of particular importance in Latrobe City as traditionally, it has had a poor reputation, and the area is going through an economic transition that is rebuilding the place brand.
99. While the Activity Centre Zone provides guidance on where the view lines, gateways and important features, the policy at Clause 15.01-1L provides guidance when assessing signage applications under Clause 52.05, as such it is believed that no further changes are required.

3.3.4 Separation distances between Major Promotion Signs

Table 7: Theme (vi) Overview

Theme description	Submission	Is submission resolved with Council officer proposed response?
Exhibited policy regarding one-kilometre distances between major promotion signs were not based on evidence or justified.	11	No, officers amended the one-kilometre separation of Major Promotion Signs to reflect current threshold distances as well as supporting a threshold distance using similar municipalities as a reference. No further changes are proposed.

100. Submitter 11 has concerns regarding the one-kilometre separation requirements as being arbitrary and did not consider the characteristics of the Traralgon Activity Centre. They raised that there was an absence of justification or evidence to base this policy point from.
101. The Submitter noted that as Traralgon Activity Centre is compact, a one-kilometre separation distance on major promotion signs would ‘rule-out’ any Major Promotion Signs.
102. The submitter noted that as the provisions is expressed as a ‘strategy’ the numerical metric of one kilometre is not consistent with the role of local policy providing guidance to the exercise of discretion.
103. The submitter also was concerned that there was no distinction drawn between difference

benchmarked against other Planning Schemes and signage related amendments such as Amendment C383ggee Greater Geelong City Council documentation including the Gazetted ordinance documents and the Incorporated Document – Sign Guidelines (2024). Amendment C383ggee inserted local sign provisions at Clause 15.0-1L-03 (Signs in urban areas) and Clause 15.01-6L (Signs in rural areas).

110. The Greater Geelong Amendment introduced a provision for separation distances as a Policy Guideline which was supported by an Independent Planning Panel held on 16 and 17 October 2023.
111. The Planning Panel noted, *‘based on the examples provided by Council, particularly in Growth Areas, the Panel is satisfied that a policy guideline to space major promotion signs 1 kilometre apart is appropriate.’* The Panel’s preferred drafting is, *‘[Consider as Relevant]: Providing a minimum of 1 kilometre separation between major promotion signs on the same road.’*
112. Council officers acknowledged that the Exhibited provisions would effectively ‘limit’ most major promotion signs within the Traralgon Activity Centre, therefore the new provisions were drafted for major promotion signs on blank walls as Council officers believe this is less restrictive than the Exhibited policy which limited all major promotion signs to a separation distance of one kilometre.
113. Council officers believe that supporting advertisements on blank walls will activate current blank sites and provide economic benefits to the Traralgon Community, whilst retaining the preferred character of Precinct 2 of the Traralgon Activity Centre along with the other precincts as well.
114. Officers acknowledge, ‘space activation’ or utilising blank surfaces means to introduce visual interest to a building face adds colour to the public realm and in addition, from a crime prevention angle, there is an assumption that a well-programmed building face will read as someone ‘owning’ the space (Chan et al. 2020).
115. In addition, Council officers note, Greater Shepparton introduced a similar policy guideline outlined in Clause 15.01-2L, to *‘Discourage major promotion signs except: when attached to a building wall.’*
116. The Policy Guideline introduced through the *Greater Shepparton Urban Design Framework Addendum (2017) p.29*, which highlighted, *‘business identification signage proportioned to sit within the building parapet, not protrude beyond the building façade, discourage promotion signs that project outside the perimeter of the building, and that major promotion signs should be attached to and integrated into the front building façade.’*
117. The Urban Design Framework was considered at an Independent Planning Panel for Amendment C196gshe on 18 January 2018, in which the Panel concluded that the *‘Amendment is supported by, and implements relevant sections of State and Local Planning*

Policy and is consistent with all relevant Ministerial Directions. The Amendment is well founded and strategically justified, and the Amendment should proceed... Noting these guidelines support Policy changes to the northern gateway of the Shepparton Township, with a similar industrial and commercial gateway character area to the Traralgon Activity Centre.

118. Officers note, the Rural City of Wangaratta defines a similar Strategy at Clause 15.01-1L-01 Signs, *‘To avoid major promotion signs at gateway approaches... require major promotion signs to be fixed to a building, wholly within its boundaries and not project outside of the building footprint.’*
119. Council officers note, the abovementioned guidance and acknowledged the proposed Policy Guidelines introduced through Amendment C151latr, hold a lesser weight than the general Strategies at Clause 15.01-1L-01 do, and therefore are more discretionary rather than prescriptive.
120. Officers redrafted and presented two (2) new provisions in Clause 15.01-1L-01 Major Promotion Signs to Submitter 11 on 22 April 2026, below:
- Provide a minimum of 800 metre separation between major promotion signs on the same road; and
 - Support major promotion signs within 800 metres on the same street if they are within regional and sub-regional centres and activate an existing blank wall, provided they are fixed to a building, wholly within the built form and do not project outside of the building footprint.
121. For these reasons, Council officers believe that the proposed changes have appropriately addressed the concerns raised by Submitter 11 regarding Clause 15.01-1L-01 Major Promotion Signs.
122. Council officers understand that as the provision is proposed to be moved into a Policy Guideline, the Practitioner’s Guide to Victoria’s Planning Schemes, notes on p. 76 that, *‘...in most instances, specific (often numerical) requirements can be included. Operationally, policy guidelines must be taken into account but are not required to be given effect to (unlike strategies and objectives).*

3.3.5 Terminology of ‘Subordinate’

Table 8: Theme (vii) Overview

Theme description	Submission	Is submission resolved with Council officer proposed response?
Submitter 11 believes the term ‘subordinate’ to built form is not defined.	11	No, the term ‘subordinate’ is not well defined in the Latrobe Planning Scheme and had been replaced with

		'complementary' at Schedule 1 to Clause 37.08 Precinct requirements.
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123. It is noted that Submitter 11 refers to Clause 4.4 in the submission, however, the relevant strategy that is being referred to is in Clause 5.3-4, 5.4-4 and 5.5-4 Precinct Guidelines.
124. Submitter 11 believed the term 'subordinate' to built form at Schedule 1 to Clause 37.08 5.3-4, 5.4-4 and 5.5-4 Precinct Guidelines, was not well defined and generally created uncertainty for permit applications and decision makers.
125. Council officers acknowledge the terminology of 'subordinate' used at Schedule 1 to Clause 37.08 5.3-4, 5.4-4 and 5.5-4 Precinct Requirements is not well defined. The term 'subordinate' does not provide further information about the sign placement or look on built form.
126. The term 'complementary' defined by Merriam Webster means 'serving to fill' or 'complete', whereas 'subordinate' is defined as 'placed in or occupying a lower class, rank, or position.'
127. The term complementary clearly supports the findings from the *Latrobe City Signage Review (2025)*, where visual clutter resulting from excessive numbers of signs, as well as their placement was prevalent in Regional and Sub-regional centres. The term complementary can be used to ensure signage is not the 'only' feature which supports a business' visual identification but complements the built form of which it resides.
128. It is also noted that the redrafted provision will re-introduce the term 'complementary' from pre-exhibition changes, which were approved through Amendment C106latr, introducing Schedule 1 to Clause 37.08 Activity Centre Zone, Gazetted on 7 February 2019.
129. It is believed that the term 'complementary' suitably defines how signage should interact with the Activity Centre Zone at 5.3-4, 5.4-4 and 5.5-4 Precinct guidelines.
130. Given that this reverts to what is currently in the Planning Scheme no further changes are proposed by Council.

3.3.6 Terminology of 'Dominate'

Table 9: Theme (viii) Overview

Theme description	Submission	Is submission resolved with Council officer proposed response?
The requirements that sign structures 'not dominate the surrounding area or detract from the host site or building'	11	No, officers proposed to rephrase the term 'dominate', and provided more context regarding its reference to

is vague. Drafting of the proposed ordinance provides no basis for distinguishing acceptable commercial signage and genuinely problematic signage.		appearance, size and illumination in regard to the building or site on which the sign is situated. No further changes are proposed.
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131. Submitter 11 noted the word ‘dominate’ is not well defined under the proposed changes to Clause 15.01-1L-01 Signs and drafting of the proposed ordinance provides no basis for distinguishing acceptable commercial signage and genuinely problematic signage.
132. Officers acknowledge that the term ‘dominate’ is not well defined and note, Clause 15.01-1L-01 Policy Guidelines are there to support all Regional and Sub-regional areas, which extends outside the reach of Schedule 1 to Clause 37.08 to Schedule 2 to Clause 37.08 and Commercial 1 Zone (C1Z).
133. Officers acknowledged the provision needed to be clearer by defining what features of sign should be considered when acknowledging the eight (8) defined character areas listed in the *Latrobe City Signage Strategy (2025)*.
134. A general consideration and approach was defined using Clause 52.05-8 Decision Guideline – All Signs, was drafted to support a clearer provision for Latrobe City’s unique character areas.
135. Council officers believe that the redrafting adds qualitative requirements to the assessment of a planning permit under Clause 52.05.
136. As a result, a new Policy Guideline at Clause 15.01-1L-01 was redrafted and is now proposed to read, *‘Encourage the appearance, size, illumination and other aspects of signs to complement the building, or site on which they are displayed and not detract from the character of the area.’*
137. Officers believe the redrafted provision will support the other genuine commercial zones identified in the Regional and Sub-regional requirements in the *Latrobe City Signage Strategy (2025)* and therefore do not intend to make any further changes or delete this provision.
138. Council officers believe that Submission 11 has been appropriately considered, that it is consistent with the Practitioners’ Guide and that the proposed changes are strategically justified.

3.4 Council's response to submissions - Submitter 10

139. This section of Council's submission provides an expanded response to key themes raised by Submitter 10 and responds to Direction 8(b) by the Planning Panel.
140. Tables 10 - 14 provides an overview of the themes being responded to, the submissions in which the theme relates to and whether the Council officer's response resolved the concerns of the submitter(s).
141. Refer to Attachment 1 for a detailed description of Council's response to submissions.

3.4.1 Introduced Policy is an Overreach as a Planning Instrument

Table 10: Theme (ix) Overview

Theme description	Submission	Is submission resolved with Council officer proposed response?
The new Policy introduced at Clause 15.01-1L-01 and the <i>Latrobe City Signage Strategy (2025)</i> are an overreach as a planning instrument.	10	No, Amendment C151latr does not make changes to Clause 52.05 Signs (State Policy), and the introduced Policy is there to guide applicants and decision-makers. No further comment was supplied by Submitter 10.

142. Submitter 10 raised concerns that the introduced Policy at Clause 15.01-1L-01 and the *Latrobe City Signage Strategy (2025)*, were an 'overreach as a planning instrument.'
143. In responding to Submitter 10's concerns, Council officers noted that the Strategy aims to make it simpler to apply for a sign permit by streamlining the planning application process. Ultimately, the *Latrobe City Signage Review (2025)* p.21 highlights, '*Illustrations are required to demonstrate what is deemed appropriate, therefore providing a visual tool to help interpret the introduced policy at Clause 15.01-1L-01 signs*'. The Strategy provides guidance on what signage is encouraged in the Strategy's eight (8) identified character areas.
144. The new Policy does not amend the State provisions at Clause 52.05 Signs. Accordingly, applicants and decision-makers will continue to be guided by Clause 52.05-08 Decision Guidelines and Clauses 52.05-11 to 52.05-14, which set out the requirements for Category 1, 2, 3 and 4 signs respectively. Nor does it attempt to assign alternative categories to that in the applied zones or overlays.
145. The new Policy will be there to guide applicants and decision makers to consider the local context and provide qualitative guidance, noting Clause 52.05 does not provide context for signs within Latrobe City.
146. The *Victorian Practitioners Guide to the Victorian Planning System (2025)* p.72 notes, '*Local*

policy has an important role in expressing the local objectives of a municipality and helping shape the kind of place council wishes to create... Local policy complements the zones, overlays and provisions that are the primary implementation mechanism for the objectives of the municipality.'

147. The *Latrobe City Signage Background Review 2025* p.6 identified that there was a gap within the Scheme and Clause 52.05 Signs, in relation to local context policy and guidance for signage. The Strategy (2025) and the introduced policy will, '*provide guidance for planning permit applicants.*'
148. As well as the indication for a gap in policy, the *Latrobe Planning Scheme Review (2024)* recommended that Council undertake a signage strategy over the next four (4) years as further strategic work.
149. Furthermore, in support of including the local policy, the Planning Panel Report for Amendment C204warr p.11 states, '*the proposed local policy does this in a way that goes beyond existing state-wide guidance on the provisions of Clause 52.05. The Policy must also be relatable to the Municipal Strategic Statement (that is it must have a clear strategic basis) and support decision making.*'
150. The *Warrnambool Planning Scheme Rewrite Project (2015)* through the *Advertising Signage – Background Report (2019)* p.2 noted, '*New policy is required to guide consideration of advertising signage and ensure that the city's development standards for signage are robust and reflective of current practice so that the public domain is attractive, safe...*'
151. In addition, Cardinia Shire Council inserted the *Advertising Signage Design Guidelines (2020)* as a background document through Amendment C264card Gazetted on 22 October 2021. The document notes, '*The guidelines and policy are needed to provide guidance for decision makers (sic) in understanding what types of signs are supported and are not supported by Cardinia Shire.*' Generally, the Guidelines provide guidance for sign types by introducing visual representation of the preferred sign style.
152. In addition to provisions with the aforementioned municipalities, the City of Port Phillip *Outdoor Advertising Sign Guidelines (2007)* p.3 state, '*...if well designed and located, signage can be helpful and informative, whilst adding interest, colour and character to local streetscapes. These guidelines are not unduly restrictive and are aimed at avoiding excessive amounts of inappropriate signage in sensitive locations.*' Noting that Port Phillip Council similarly applies advice for encouraged and discouraged sign locations.
153. Additionally, as noted in *FSST Pty Ltd v Port Phillip CC [2026] VCAT 426 (15 June 2026)*, paragraph 53, '*...policy serves as a guide to decision making but it is not the planning control.*'
154. There are numerous examples of the use of policy to guide decision making around signage permits. As such, Council officers do not believe that the proposed Clause 15.01-1L-01 is an

overreach.

155. As Submitter 10 did not request any changes to the new local policy, Council officers do not intend to make any further changes.

3.4.2 Major Promotion and Electronic Signs

Table 11: Theme (x) Overview

Theme description	Submission	Is submission resolved with Council officer proposed response?
The approval of a major promotion sign in the Traralgon Activity Centre is a distraction to those who drive.	10	No, Council noted that the major promotion sign was supported by the Department of Transport and Planning (DTP) and Strategic Planning, as there was limited policy in the Scheme to discourage this type of sign. Submitter 10 does not believe this information satisfies their request.

156. Submitter 10 noted Council approved a 'GAWK' sign on the corner of Hotham Street and Franklin Street, that goes above the building line. The sign is illuminated and a distraction to people driving through the roundabout.
157. Council officers note Submitter 10 did not support that major promotion sign, which was digital, illuminated and electronic at 27 Franklin Street, Traralgon. Accordingly, Submitter 10 objected to planning application 2022/325 on December 2021, on the grounds of 'vehicle safety' and an 'overall detrimental effect on the quality of the work environment and amenity of the Traralgon CBD.'
158. The Strategic Planning team at Council provided a referral response to application 2022/325 on 27 October 2021, supporting the proposed sign, however noting that, *'There had been a pattern of electronic billboards being introduced in the Traralgon CBD, and that Strategic Planning will be requesting changes in future signage proposals to limit further illuminated or electronic signs.'* This is believed to be the catalyst for strategic work to be completed to provide clearer guidelines for signage across the municipality.
159. Submitter 10 was notified on 10 March 2022 that the concerns regarding brightness of the proposed sign were at an acceptable level and would operate in accordance with the standard VicRoads standard permit conditions.
160. Submitter 10 also had concerns regarding traffic and road safety, noting a response highlighting the implementation of the standard VicRoads permit conditions ensures that the

safety and efficiency of the road is prioritised throughout the operation of the sign.

161. The planning permit for a 4,160cm x 5,160cm major promotion sign was initially proposed, however the wrap around section and height were amended to 7,150cm x 885cm. A planning permit for the operation of a Major Promotion Sign was approved on 18 August 2022.
162. To clarify the abovementioned information an in-person meeting was held with Submitter 10 on 12 March 2026 and Major Promotion Signs and the nature of planning permit 2022/325 were discussed and information regarding the events were noted by Submitter 10.
163. Council officers provided a written response through email on 15 April 2026, in which abovementioned information was supplied. Council officers noted under the Scheme at Clause 52.05 Signs, an electronic sign is not prohibited and Planning Permit 2022/325 did require a permit as all major promotion signs do trigger a planning permit under Clause 52.05-11 Category 1 Commercial Areas.
164. Furthermore, Council cannot amend Clause 52.05 as it is set by the Department of Transport and Planning and cannot be amended through Amendment C151latr.
165. Officers noted, Amendment C151latr can provide guidance on the location of the signage and aims to support Major Promotion Signs in appropriate locations in urban areas through the new policy at Clause 15.01-1L-01. The Amendment will amend new Policy at Clause 37.08 to ensure it is more effective. The policy will:
 - Discourage signage that protrudes past the built form, particularly above the parapet; and
 - Discourage signage structures that interfere with streetscape views or building features.
166. Council does not intend to make changes to the planning permit triggers outlined in Clause 52.05, therefore it is believed no further action is required.

3.4.3 Above-Verandah Signs and General Signage Placement

Table 12: Theme (xi) Overview

Theme description	Submission	Is submission resolved with Council officer proposed response?
Verandah signs are needed as when pedestrians pass by they can easily identify a business. In addition to above-verandah signs, the Submitter questioned the policy regarding parapet signs within the building line	10	No, Council officers noted that although above-verandah signs are discouraged in the identified character areas, noting Clause 52.05 Signs does not prohibit these. Submitter 10 noted this response but did not reply for comment.

and signs on pillars between windows.		
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167. Council officers noted Submitter 10 had concerns regarding the introduced policy and Strategy discouraging above verandah signs, signs within the building line and the limitation of signs on pillars between windows.
168. The *Latrobe City Signage Review (2025)* p.11 notes in Regional and Sub-regional Retail Centres, there are inconsistencies in the types and sizes of signs located above the verandah which can dominate building facades and appear out of character of the area.
169. Officers note, buildings and signs, as integral objects, are centre to pedestrian perceptions of an area. However, a legible and well-organised signscape can increase positive perceptions and economic activity, while the opposite can create visual pollution and hinder commerce (Yun and Choi, 2023).
170. Council acknowledges that although the new policy will discourage ‘above-verandah signs’, if Clause 52.05 triggers a planning permit, an above-verandah sign is not prohibited in Clause 52.05-11 Category 1 Commercial Areas, but ideally to retain a ‘well organised landscape,’ these signs are discouraged.
171. In addition to above-verandah signs, generally, the *Latrobe City Signage Strategy (2025)* p.11, signage in Regional and Sub-regional Retail Centres encourage signage, ‘within the built form’ to eliminate visual clutter, visibility through windows, and the impact on pedestrian movements and streetscape views.
172. The Strategy (2025) is consistent with the *Latrobe City Urban Design Guidelines (2021)* p.4, ‘To ensure business identification signage is of a size and design which complements the host building and is not overly dominant in the streetscape as to cause visual clutter.’
173. Furthermore, the *Warrnambool Advertising Signage – Background Report (2019)* p.30 notes, ‘Although there may be some instances where ‘multiple signs’ may be acceptable, to avoid visual clutter, new signs should take into account the existing signs and surrounding streetscape features. Wherever possible, a co-ordinated approach should be taken to the design and location of multiple signs.’
174. In addition to supporting the Guidelines (2021), the regard for signage in the Scheme is supported by the purpose of Built Form in Schedule 1 and Schedule 2 to Clause 37.08 Activity Centre Zone, ‘To create strong urban form that responds to the public realm and regional character.’
175. It is noted that at a pedestrian scale, above verandah signs are less likely to be seen.
176. Officers believed no changes were required as the Amendment does not seek to change the planning permit triggers outlined in Clause 52.05, and therefore does not affect the function of

the new policy being introduced at Clause 15.01-1L-01.

3.4.4 Visibility into Shopfront Windows and Sign Placement

Table 13: Theme (xii) Overview

Theme description	Submission	Is submission resolved with Council officer proposed response?
Businesses should be able to cover their shopfronts with signs and place them wherever they see fit.	10	No, Council officers noted that the Decision Guidelines at Clause 52.05-08 are assessed by Officers on a case-by-case basis and the <i>Latrobe City Signage Strategy (2025)</i> is only there as guidance. Submitter noted this and did not provide any further comments or request any changes.

177. Submitter 10 raised concerns regarding how the Strategy was being used to control how signage was presented on store shopfronts. Particularly, there were issues with discouraging window coverings, the placement of above the parapet signs and signs in between windows.
178. Officers noted that the Strategy is discouraging signs covering shopfront windows which is well supported though academic literature in which, ‘passive surveillance’ and the benefit of removing blank walls and solid surfaces from buildings improves safety (Navarrete-Hernandez et al. 2021).
179. Council officers also noted higher transparent window displays are associated with greater attractiveness ratings and longer durations of ‘observations’ from customers and are more willing to go inside the store if the glazing is transparent (Kalantari et al. 2022).
180. Officers noted the Decision Guidelines at Clause 52.08-08 Signs are assessed by Officers on a case-by-case basis. The Strategy is there to support applicants and decisions makers to determine what signage is encouraged in the different character areas and Officers cannot make changes to the planning permit triggers identified at Clause 52.05-11,12,13,14.
181. Submitter 10 noted this and did not provide further comment, nor were any changes requested to the proposed policy and Strategy documents. Therefore, Council does not intend to make any changes based on Submitter 10’s submission.

3.4.5 Increased Red Tape

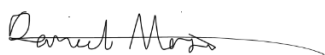
Table 14: Theme (xiii) Overview

Theme description	Submission	Is submission resolved with Council officer proposed response?
Increased 'red tape' is being placed on business owners who must apply for a signage permit.	10, 11	Both submitter 10 and 11 raised concerns regarding the Strategy providing an unnecessary layer of policy, when it is not necessarily required. Officers believe changes are not required as the introduced policy at Clause 15.01-1L-01 will support guidance on the local character areas, where Clause 52.05-08 does not.

182. Both Submitter 10 and Submitter 11 noted the introduced provisions at Clause 15.01-1L-01 (Signs) added an extra layer of policy or 'red tape' to a system which already defines preferred sign types. Submitter 10 voiced concerns that the extra 'red tape' would further increase the financial burden of business owners but did not recommend any changes to the exhibited policy.
183. A response to Submitter 11 was provided at Section 3.2.
184. Council officers acknowledge that during difficult economic times, businesses will find it more difficult to financially support encouraged signage, however, there are no proposed changes for planning permit triggers at Clause 52.05 Signs. Rather, Clause 15.01-1L-01 will be used for guidance by applicants and decision-makers through the planning permit process (Attachment 3). Guidance on how the introduced policy at Clause 15.01-1L-01 interacts with the planning permit process can be found at Section 3.2.2.
185. Council officers cannot make changes to Clause 52.05 (Signs) and believes Clause 15.01-1L-01 is an appropriate addition to local policy for signs and therefore does not propose to make any further changes to the proposed policy at Clause 15.01-1L-01 (Signs).

4. Conclusion

- 166 The Amendment introduces new objectives, strategies and policy guidelines into Clause 15.01-1L-01 Signs and introduces specific policy for Heritages Places and Major Promotion Signs. The Amendment also introduces clearer sign provisions at Schedule 1 (Traralgon Activity Centre) and Schedule 2 (Morwell Activity Centre) to Clause 37.08 Activity Centre Zone (ACZ1 and ACZ2). It introduces the *Latrobe City Signage Strategy (2025)* as a background document at Clause 72.08.
- 167 It is considered that the Amendment has significant strategic justification through the *Latrobe City Signage Background Report (2025)* and *Latrobe City Signage Guidelines (2025)*.
- 168 The Amendment is considered to be consistent with the objectives of the Planning Policy Framework and Municipal Planning Strategy contained within the Latrobe Planning Scheme.
- 169 The Amendment ensures that the Scheme supports the ease of use and maintenance of clear sign guidelines at the local level.
- 170 Latrobe City Council respectfully requests that the Planning Panel support Planning Scheme Amendment C151 and consider the proposed post exhibition changes in response to submissions as detailed in section 3 of this report.
- 171 This completes the Part B submission for the Planning Authority.



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