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## **AMENDMENT C383ggee ADVERTISING SIGN GUIDELINES, CONSIDERATION OF SUBMISSIONS**

**To:** Peter Smith – Coordinator Strategic Implementation  
**From:** Rachel Carr – Strategic Planner  
**Subject:** Resolution to consider submissions to an amendment under delegation  
**File number:** D23-347019

### **Purpose**

This report considers submissions to Amendment C383ggee and recommends that Council resolves (under delegation) to refer the submissions to an Independent Panel.

### **Summary**

- The Amendment proposes to replace the current outdated Advertising Sign Guidelines with an updated Advertising Sign Guidelines, and make associated changes to the Greater Geelong Planning Scheme;
- On 28 February 2023 Council endorsed the preparation and exhibition of Amendment C383ggee and it was authorised to exhibit by the Minister for Planning's delegate on 5 April 2023.
- The Amendment was exhibited between 18 May and 26 June 2023 and during this period, eight submissions were received;
- In general, the submissions raised concerns that the Guidelines were overly restrictive, particularly in the growth area context, and argued for a finer-grain approach;
- Due consideration was given to the concerns of the submitters, and some suggestions in relations to improving safety, clarifying intent, and reducing potential impact on Council resources are proposed to be agreed to;
- A number of submitter requests to alter or delete various items in the guidelines, particularly as they relate to growth area signage and major promotional signage, are not supported by Council officers;
- It is requested Council (under delegation) agrees to refer the submissions to an independent Panel to further resolve the remaining submissions.

### **Recommendation**

**That Council having considered all submissions to Amendment C383ggee to the Greater Geelong Planning Scheme, resolves to:**

- 1) Request the Minister for Planning to appoint an Independent Panel under Part 8 of the Planning and Environment Act, 1987;**
- 2) Refer all submissions to the Panel; and**
- 3) Submit to the Panel its response to the submissions generally as outlined in this report.**

**Approved as a resolution of Council by Council's delegate: P. Smith  
Date: 30 August 2023**

### **Background**

In 2021/2022 the City conducted a review of the Advertising Signage Guidelines (City of Greater Geelong 1997) which are currently included in the Greater Geelong Planning Scheme as an incorporated document to guide decision making. The review found there is a need to update the current guidelines for a number of reasons, including:

- The current guidelines are over 20 years old.
- There have been numerous changes to the planning scheme since this time, including to the number and types of commercial zones, as well as to the advertising sign particular provision (Clause 52.05).
- The evolving nature of advertising signage and urban design requires updated direction for planning permit applications.

An Issues and Options Paper was prepared, which outlines the current policy and statutory context, issues and case studies of signage in the municipality. It recommends new guidelines be prepared, as well as a short local policy provision for advertising signs. The structure recommended for the new Guidelines would be based on different area types identified in Greater Geelong, such as pedestrian oriented commercial areas including High Street in Belmont and Ormond Road in East Geelong, as well as Highway oriented commercial areas, such as Waurin Ponds Shopping Centre or Leopold Gateway Plaza.

New Advertising Sign Guidelines have been prepared collaboratively with Urban Design consultants Urban Fold, based on the recommended structure and issues identified in the Issues and Options Paper. These Guidelines, as well as the Issues and Options paper, have been peer reviewed by Transect Planning Consultants.

The Peer Review agreed with the recommendations of the Issues and Options Paper and with the approach taken by council, including replacing the current guidelines as an incorporated document in the planning scheme and proceeding with a planning scheme amendment.

The former Department of Environment Land Water and Planning (Central Geelong) and Department of Transport were consulted in the development of the new Guidelines.

Amendment C383ggee has been prepared and proposes to add the *City of Greater Geelong Advertising Sign Guidelines (May 2022)* as an incorporated document to the Greater Geelong Planning Scheme, insert the *City of Greater Geelong Advertising Sign Guidelines Review – Issues and Options Paper (May 2022)* as a background document, and insert new clauses 15.01-1L-03 and 15.01-6L to require signs in urban and rural areas to comply with the updated Advertising Sign Guidelines (May 2022).

Council adopted the guidelines on 28 February 2023 and endorsed the preparation of the Amendment which was subsequently submitted to the Minister for Planning for authorisation and put on exhibition in accordance with Ministerial Direction 15 – The Planning Scheme Amendment Process.

### **Discussion**

Exhibition of Amendment C383 occurred between 18 May and 26 June 2023, with notices published in the local newspaper and online, and letters sent to affected groups,

agencies and Ministers a week prior to a notice being published in the Government Gazette on 25 May.

Eight submissions were received during the exhibition period. Each of these eight submissions seek changes to the amendment with seven objecting submissions from land developers or their consultants and one supportive submission from VicTrack which also requested changes.

A summary of submissions and officer response to each submission is in **Appendix 1**.

In general, the submissions addressed common issues, namely concerns that the Guidelines were overly restrictive and argued for a finer-grain approach. There was push back against sections of the Guidelines seen to have an unduly negative restriction on the 'branding' of growth area developments. Questions were raised around the specific distances in a number of guidelines. Concerns were also raised that guidelines regarding electric signs were too restrictive.

### **Key issues in submissions**

The key issues raised were:

- The proposed Growth Area Sign guidelines are too restrictive;
- The proposed Major Promotion Sign guidelines are too prescriptive;
- The guidelines relating to electronic signs do not sufficiently account for technological developments, and;
- The guidelines do not allow for sufficient flexibility in response to place and context.

### **Overall Council officer response to key issues raised**

#### *Growth Area Signs Guidelines*

Clearer signage guidance for Growth Area signage is particularly important in the Geelong context as many of the earmarked growth areas interface with farming or rural land uses, and arterial roads where safety of road users must be considered. The Issues and Options Paper identified a number of concerns with signage in Growth Areas, including excessive visual clutter, signs erected at a large distance from the subject site, and signage which is haphazard and detrimental to the landscape, such as trailer-mounted signs and signs fixed to shipping containers. With the final stages of the Armstrong Creek Urban Growth Area, which is very near to the Bellarine Peninsula declared Distinctive Area and Landscape, being developed over the next few years and the commencement of development in the North and Western Growth Areas in the coming years, it is crucial Council has a framework ensuring sign outcomes in these contexts which are appropriate considering their often sensitive interfaces.

#### *Major Promotion Sign Guidelines*

The Issues and Options Paper identified a number of concerns with Major Promotion Signs, including their tendency to dominate other signs such as business identification signs, loss of amenity or functionality due to size and location, impact on the site through removal of landscaping, and visual clutter. By their nature, major promotion signs dominate the context they are in. It is not Council's intention to forbid them entirely as they serve an important function and can contribute to supporting economic endeavours. However, given their dominance in the urban context, the proposed guidelines seek to facilitate a fair balance with does not prejudice other signage types, landscapes, or adjoining sites in favour of major promotional signs.

#### *Electronic Signs*

The 1997 Guidelines do not address electronic signage, and given the change in the technological landscape in the past 25 years, this is a gap the proposed Guidelines seek to address. Without a framework to ensure positive electronic sign outcomes, there is a risk of negative impacts on the area in which the sign is placed, including excessive levels of illumination and visual obstruction. The proposed guidelines support Council officers in making permit decisions that can support crucial economic activity while balancing these concerns.

#### *A Place-based Response*

Done well, signage can also add to the vitality of an area and contribute to its character. Done poorly, however, the opposite can be true. Signage can block important views of natural or architectural features, or create an unattractive, cluttered appearance to an area. Signage that is too large or high can also dominate and detract from the amenity of a public place, such as a square or park.

The proposed Guidelines endeavour to provide guidance that is context-specific by developing guidelines for contexts such as heritage places, areas with sensitive interfaces, and growth areas in which added clarity will help create an easier permit process for applicants and for Council officers assessing such applications.

#### **Recommendations**

There are no recommendations to make changes regarding the general intent of the guidelines. It should be noted that the language throughout the Guidelines is designed to encourage certain outcomes, with the understanding that the assessment of a planning permit application will take into a number of factors and a discretionary approach can be taken dependent on the context of any proposed sign. Many submission requests contain assumptions that the guidelines should be read as requirements, however that is not the intention of the document and as such, a number of these requests have been considered to have insufficient justification to change, or otherwise the request may change the overall intent of the document or the specific guideline in question. In regards to submitters concerns regarding proposed guidelines on electric signs, it is the position of Council officers that these guidelines are reasonable and primarily in the interests of safety.

It is recommended that some changes suggested in the submissions which will improve safety, clarify the document's intent, and reduce potential impact on Council resources are implemented. See **Appendix 1** for the response to individual submissions where certain changes are recommended.

A number of submitter requests to alter or delete various items in the guidelines, particularly as they relate to growth area signage and major promotional signage, are not supported by Council officers. It is therefore recommended a panel be appointed to consider submissions and make recommendations back to Council as the Planning Authority.

#### ***Financial Implications***

There will be some costs to Council involved with referring submissions to a Panel including panel fees from Planning Panels Victoria and potential cost of expert witnesses if the City decides to engage a witness.

#### ***Stakeholder Consultation and Communication***

The Amendment and Permit were exhibited in accordance with the provisions of the *Planning and Environment Act 1987*.

In accordance with Clause 4(2) of Ministerial Direction No. 15 the following panel hearing dates have been set for this Amendment:

- Directions Hearing: in the week commencing 18<sup>th</sup> September 2023.
- Panel Hearing: in the week commencing 16<sup>th</sup> October 2023.

Planning Panels Victoria will notify all submitters of the Panel dates and invite requests to be heard at the Panel Hearing.

#### ***Policy/Legal/Statutory Implications***

The amendment supports the following State Policies from the Planning Policy Framework:

Clause 15.01-1S Urban design; and

Clause 18.01-1S Land use and transport integration.

The amendment supports the following policies from the Local Planning Policy Framework:

Clause 11.03-1L Activity Centres in Greater Geelong; and

Clause 15.04-1L-02 Pakington Street North Urban Design.

The amendment supports the following clause from the Particular Provisions:

Clause 52.05 Signs.

#### ***Alignment to City Plan***

The Amendment supports the 'Sustainable Growth and Environment' strategic direction of Our Community Plan 2021-2025 by encouraging welcoming and safe streetscapes, reducing risk to transport users, and planning for enhanced liveability.

The Amendment supports the 'Strong Local Economy' strategic direction of Our Community Plan 2021-2025 by making signage guidelines clearer for businesses and other parties and assisting conditions to facilitate economic growth.

#### ***Conflict of Interest***

No Council officer involved in the preparation of this report has any direct or indirect interest, in accordance with Section 80(c) of the Local Government Act.

#### ***Risk Assessment***

There are no notable risks associated with implementing the recommendation contained in this report.

#### ***Environmental Implications***

There are no environmental sustainability implications associated with implementing the recommendations contained in this report.

**Appendix 1 - Summary of Submissions and Officer Response**

No.	Submitter	Address	Submission	Officer Response
1	Armstrong Creek Development Corporation Pty Ltd	501 Blackburn Rd Mount Waverley Victoria 3149	<p>The submitter objects to the contents of the Guidelines on the basis that they do not recognise and encourage the importance of well-designed signage within urban growth areas and take a blanket approach, rather than a best-practice place based response.</p> <p>In particular, the submitter requests the alteration or deletion of:</p> <ol style="list-style-type: none"> <li>1. General guidelines <ul style="list-style-type: none"> <li>⇒ Signs should only be located on land to which they relate</li> <li>⇒ Discourage 'v' shaped signs</li> <li>⇒ Avoid illuminated and electronic signs</li> </ul> </li> <li>2. Growth area strategies <ul style="list-style-type: none"> <li>⇒ Encourage signage management plans for new estates or where there are multiple tenancies operating on a single site.</li> <li>⇒ Discourage branding of new estates through signage.</li> </ul> </li> <li>3. Major promotion sign guidelines <ul style="list-style-type: none"> <li>⇒ Major Promotion Signs should be spaced at least 1 km from any other Major Promotion Sign on the same road.</li> <li>⇒ Ensure major promotion signs stay relevant and well maintained, by allocating an expiry date to permits of up to 5 years from the date of issue of the permit.</li> <li>⇒ Avoid more than one major promotion sign at any intersection.</li> </ul> </li> </ol>	<p>Significant care was taken in the preparation of the new guidelines to accommodate a place-based approach which creates outcomes that support the council strategies for the development and realisation of the built environment.</p> <p>The below summarises the officer response to each point raised in the submission:</p> <ol style="list-style-type: none"> <li>1. Council is willing to remove the guideline that 'Signs should only be located on land to which they relate'.  Council affirms the guideline discouraging 'v' shaped signs.  Council will consider rewording the guideline regarding illuminated and electronic signs for improved clarity or moving it to the electronic signs chapter.</li> <li>2. Council is willing to remove the strategy encouraging signage management plans due to increased impact on Council resources.  Council affirms the strategy to 'Discourage branding of new estates through signage'.</li> <li>3. Council affirms the major promotion sign guidelines listed.</li> </ol>
2	Core Projects	1-4 Layfield Street South Melbourne 3205	<p>The submitter objects to the contents of the Guidelines on the basis that their restrictiveness may negatively impact communication with the community.</p> <p>In particular, the submitter requests the alteration of deletion of:</p>	<p>In addition to the relevant comments above in response to Submission 1, the below summarises the officer response to each point raised in the submission:</p> <ol style="list-style-type: none"> <li>2. Council affirms the strategy to limit the use of electronic signs</li> </ol>

No.	Submitter	Address	Submission	Officer Response
			<ol style="list-style-type: none"> <li>1. General guidelines               <ul style="list-style-type: none"> <li>⇒ As per <i>Submission 1</i></li> </ul> </li> <li>2. Category 1 Commercial area strategy               <ul style="list-style-type: none"> <li>⇒ Limit use of electronic signs</li> </ul> </li> <li>3. Commercial area guideline               <ul style="list-style-type: none"> <li>⇒ Strongly discourage major promotion signs in Pedestrian Oriented Commercial Areas outside Central Geelong.</li> </ul> </li> <li>4. Industrial area guideline               <ul style="list-style-type: none"> <li>⇒ Avoid freestanding signs unless there is no opportunity for signs to be incorporated into buildings, or the building which it relates to on the site is set back from road more than 20m.</li> </ul> </li> <li>5. Growth area strategies               <ul style="list-style-type: none"> <li>⇒ As per <i>Submission 1</i></li> </ul> </li> <li>6. Major promotion sign guidelines               <ul style="list-style-type: none"> <li>⇒ As per <i>Submission 1</i></li> </ul> </li> <li>7. Electronic signs               <ul style="list-style-type: none"> <li>⇒ Avoid electronic signs in locations where it cannot be demonstrated the risk to road users is low.</li> </ul> </li> </ol>	<p>3. Council affirms the guideline to strongly discourage major promotion signs in Pedestrian Oriented Commercial Areas outside Central Geelong.</p> <p>4. Council affirms the guideline to avoid freestanding signs unless there is no opportunity for signs to be incorporated into buildings, or the building which it relates to on the site is set back from road more than 20m.</p> <p>5-6. As per <i>Submission 1</i> response above.</p> <p>7. Council affirms the guideline regarding electronic signs and road user risk, which is supported by the Victorian Road Safety Strategy 2021-2030 (Department of Transport, 2021), VicTrack Rail Development Interface Guidelines (VicTrack, 2019), and the findings of <i>Westfield Limited v Manningham (Red Dot) [2011] VCAT 1341</i>.</p>
3	DFC (Project Management) Pty Ltd	Level 1, 863 High Street Armadale 3143	<p>The submitter objects to the contents of the Guidelines on the basis that they are overly restrictive to a degree that they are inconsistent with signage policy applied across Victoria in urban and growth area settings.</p> <p>In particular, the submitter requests the alteration of deletion of:</p> <ol style="list-style-type: none"> <li>1. General guidelines               <ul style="list-style-type: none"> <li>⇒ Signs should only be located on land to which they relate</li> </ul> </li> </ol>	<p>In addition to the relevant comments above, the below summarises the officer response to each point raised in the submission:</p> <ol style="list-style-type: none"> <li>1. Council affirms the guideline to discourage multiple promotion signs that are advertising the same or similar message on a single site or visible across multiple sites.</li> </ol> <p>Council is willing to consider an alteration to the guideline regarding signs on open sites, in the form of the following “Discourage signs that detract from the visual and landscape amenity of a road, cycling, pedestrian or rail corridor.”, or similar.</p>

No.	Submitter	Address	Submission	Officer Response
			<ul style="list-style-type: none"> <li>⇒ Discourage multiple promotion signs that are advertising the same or similar message on a single site or visible across multiple sites.</li> <li>⇒ Discourage signs on open sites where they will be a dominant visual element in the landscape and detract from the visual amenity of a road, cycling, pedestrian or rail corridor.</li> <li>⇒ Discourage 'V' shape signs.</li> <li>2. Growth area objectives               <ul style="list-style-type: none"> <li>⇒ To protect areas of new development from a proliferation of advertising signage.</li> </ul> </li> <li>3. Growth area strategy               <ul style="list-style-type: none"> <li>⇒ Discourage branding of new estates through signage.</li> </ul> </li> <li>4. Growth area guidelines               <ul style="list-style-type: none"> <li>⇒ Subdivision and new estate promotion signs should be limited to a maximum of one per road frontage.</li> <li>⇒ 250 m separation should be provided between all off site estate promotional signs, and a maximum of 4 in total.</li> <li>⇒ 150 m separation should be provided between all signs within the same estate and a maximum of 4 in total.</li> <li>⇒ The height or width of a promotion sign should not exceed 6 m and the total advertisement area should not exceed 8 square metres.</li> <li>⇒ Ensure promotional signage stays relevant and well maintained, by allocating an expiry date to permits of up to 5 years from the date of issue of the permit.</li> </ul> </li> <li>5. Major promotion sign guidelines</li> </ul>	<ul style="list-style-type: none"> <li>2. Council affirms the objective to protect areas of new development from a proliferation of advertising signage.</li> <li>3. As per <i>Submission 1</i> response above</li> <li>4. Council affirms all the growth area sign guidelines listed.</li> <li>5. As per <i>Submission 1</i> response above</li> </ul>

No.	Submitter	Address	Submission	Officer Response
			<ul style="list-style-type: none"> <li>⇒ Ensure major promotion signs stay relevant and well maintained, by allocating an expiry date to permits of up to 5 years from the date of issue of the permit.</li> </ul>	
4	Jinding Australia c/- Spiire	PO Box 4032 Geelong 3220	<p>The submitter objects to the contents of the Guidelines on the basis that they are overly prescriptive and do not provide appropriate flexibility for reasonable levels of estate signage and place-based assessments. The submitter implies an unreasonable prejudice within the proposed Guidelines against promotion signs.</p> <p>In particular, the submitter requests the alteration of deletion of:</p> <ol style="list-style-type: none"> <li>1. General strategies <ul style="list-style-type: none"> <li>⇒ Prioritise business identification signs as the main types of signage.</li> </ul> </li> <li>2. General guidelines <ul style="list-style-type: none"> <li>⇒ Signs should only be located on the land to which they relate.</li> </ul> </li> <li>3. Growth area strategy <ul style="list-style-type: none"> <li>⇒ Discourage branding of new estates through signage.</li> </ul> </li> <li>4. Growth area guidelines <ul style="list-style-type: none"> <li>⇒ Subdivision and new estate promotion signs should be limited to a maximum of one per road frontage.</li> <li>⇒ 250 m separation should be provided between all off site estate promotional signs, and a maximum of 4 in total.</li> <li>⇒ 150 m separation should be provided between all signs within the same estate and a maximum of 4 in total.</li> <li>⇒ The height or width of a promotion sign should not exceed 6 m and the total advertisement area should not exceed 8 square metres.</li> </ul> </li> </ol>	<p>In addition to the relevant comments above, the below summarises the officer response to each point raised in the submission:</p> <ol style="list-style-type: none"> <li>1. The strategy to prioritise business identification signs is consistent with the site context report requested in signage applications and as such no changes are accepted.</li> <li>2-3. As per <i>Submission 1</i> response above</li> <li>4. As per <i>Submission 3</i> response above</li> </ol>

No.	Submitter	Address	Submission	Officer Response
	Lovely Banks Development Group Pty Ltd c/- Peter Jewell	PO BOX 100 South Yarra 3141	<p>The submitter recognises the need to update the Guidelines however objects to the proposed contents on the basis that they are inflexible and take a blanket approach, rather than a best-practice place based response, particularly in relation to electronic signage and other technological developments which may impact signage.</p> <p>In particular, the submitter requests the alteration of deletion of:</p> <ol style="list-style-type: none"> <li>1. General guidelines ⇒ As per <i>Submission 1</i></li> <li>2. Commercial Areas strategy ⇒ As per <i>Submission 2</i></li> <li>3. Commercial Area guideline ⇒ As per <i>Submission 2</i></li> <li>4. Industrial area guideline ⇒ As per <i>Submission 2</i></li> <li>5. Growth area strategies ⇒ As per <i>Submission 1</i></li> <li>6. Growth area guidelines (all)               <ul style="list-style-type: none"> <li>⇒ Subdivision and new estate promotion signs should be limited to a maximum of one per road frontage.</li> <li>⇒ Offsite estate promotional signs should be located within 1.6 km or the closest major intersection (whichever is closer) of the exterior boundary of the subdivision development to which they relate.</li> <li>⇒ 250 m separation should be provided between all off site estate promotional signs, and a maximum of 4 in total.</li> <li>⇒ 150 m separation should be provided between all signs within the same estate and a maximum of 4 in total.</li> </ul> </li> </ol>	<p>In addition to the relevant comments above, the below summarises the officer response to each point raised in the submission:</p> <ol style="list-style-type: none"> <li>6. Council affirms the growth area sign guidelines listed.</li> </ol>

No.	Submitter	Address	Submission	Officer Response
			<ul style="list-style-type: none"> <li>⇒ The height or width of a promotion sign should not exceed 6 m and the total advertisement area should not exceed 8 square metres.</li> <li>⇒ Ensure promotional signage stays relevant and well maintained, by allocating an expiry date to permits of up to 5 years from the date of issue of the permit.</li> <li>⇒ Avoid trailer mounted signs or any form of moveable signage associated with land sales.</li> <li>7. Major promotion signs               <ul style="list-style-type: none"> <li>⇒ As per <i>Submission 1</i></li> </ul> </li> <li>8. Electronic signs               <ul style="list-style-type: none"> <li>⇒ As per <i>Submission 2</i></li> </ul> </li> </ul>	
6	Property Council of Australia	7/136 EXHIBITION STREET MELBOURN E 3000	<p>The submitter objects to the contents of the Guidelines on the basis that they are overly restrictive and may undermine the purpose of advertising signage as a vital economic factor.</p> <p>In particular, the submitter requests the alteration or deletion of:</p> <ol style="list-style-type: none"> <li>1. General guidelines             <ul style="list-style-type: none"> <li>⇒ As per <i>Submission 1</i></li> </ul> </li> <li>2. Commercial Areas strategy             <ul style="list-style-type: none"> <li>⇒ As per <i>Submission 2</i></li> </ul> </li> <li>3. Commercial Area guideline             <ul style="list-style-type: none"> <li>⇒ As per <i>Submission 2</i></li> </ul> </li> <li>4. Industrial area guideline             <ul style="list-style-type: none"> <li>⇒ As per <i>Submission 2</i></li> </ul> </li> <li>5. Growth area strategies             <ul style="list-style-type: none"> <li>⇒ As per <i>Submission 1</i></li> </ul> </li> <li>6. Growth area guidelines (all, with focus on the below)</li> </ol>	All points raised in this submission have been addressed above.

No.	Submitter	Address	Submission	Officer Response
			<ul style="list-style-type: none"> <li>⇒ The height or width of a promotion sign should not exceed 6 m and the total advertisement area should not exceed 8 square metres.</li> <li>⇒ Avoid trailer mounted signs or any form of moveable signage associated with land sales.</li> <li>7. Major promotion sign guidelines               <ul style="list-style-type: none"> <li>⇒ Ensure major promotion signs stay relevant and well maintained, by allocating an expiry date to permits of up to 5 years from the date of issue of the permit.</li> <li>⇒ Avoid more than one major promotion sign at any intersection.</li> </ul> </li> <li>8. Electronic signs               <ul style="list-style-type: none"> <li>⇒ As per <i>Submission 2</i></li> </ul> </li> </ul>	
7	VicTrack	Level 8, 1010 La Trobe St Docklands 3008	<p>The submitter generally supports the Guidelines but makes some suggestions to ensure rail safety is sufficiently addressed.</p> <ol style="list-style-type: none"> <li>1. Requests further consideration of rail safety within the general guidelines. Provides suggested wording accordingly.</li> <li>2. Suggests addition of new general guideline “Discourage signs that will adversely affect the safety and operation of public transport and roads”</li> </ol>	<p>The need to sufficiently address rail safety is acknowledged.</p> <ol style="list-style-type: none"> <li>1. The requested changes are acceptable.</li> <li>2. Addition of new guideline acceptable</li> </ol>
8	Villawood Properties c/- Mesh	2/299 Clarendon St South Melbourne 3205	<p>The submitter recognises the need to update the Guidelines however objects to the proposed contents on the basis that as written, they may result in outcomes which unnecessarily restrict signs where they would otherwise be accepted.</p> <p>In particular, the submitter requests the alteration of deletion of:</p> <ol style="list-style-type: none"> <li>1. General strategies               <ul style="list-style-type: none"> <li>⇒ As per <i>Submission 4</i>.</li> </ul> </li> <li>2. General guidelines</li> </ol>	<p>In addition to the relevant comments above, the below summarises the officer response to each point raised in the submission:</p> <ol style="list-style-type: none"> <li>1. As per <i>Submission 4</i> response above.</li> <li>2. Council acknowledges the objection to the guideline “Discourage signs that require earthworks or the removal of trees or landscaping. and proposes a more positive framing as follows “Encourage signage that retains existing trees and introduces new landscaping and vegetation.”, or similar.</li> <li>3. Council is willing to make minimal alterations which clarify the wording of the strategy to ensure signage near passive open space and other sensitive areas is discreet.</li> </ol>

No.	Submitter	Address	Submission	Officer Response
			<ul style="list-style-type: none"> <li>⇒ Discourage multiple promotion signs that are advertising the same or similar message on a single site or visible across multiple sites.</li> <li>⇒ Discourage 'V' shape signs.</li> <li>⇒ Discourage signs that require earthworks or the removal of trees or landscaping.</li> <li>3. Interface area strategy               <ul style="list-style-type: none"> <li>⇒ Ensure signage near passive open space and other sensitive areas is discreet.</li> </ul> </li> <li>4. Interface area guidelines               <ul style="list-style-type: none"> <li>⇒ Signs should not face toward, dominate the outlook from or result in increased illumination to adjoining landscapes, passive open space or nearby dwellings.</li> </ul> </li> <li>5. Growth area guideline               <ul style="list-style-type: none"> <li>⇒ Offsite estate promotional signs should be located within 1.6 km or the closest major intersection (whichever is closer) of the exterior boundary of the subdivision development to which they relate.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>4. Council may be willing to consider an alteration to the interface guideline regarding signs facing open space etc, in the form of the following "Signs should not dominate the outlook from or result in increased illumination to adjoining landscapes, passive open space or nearby dwellings.", or similar.</li> <li>5. As per growth area responses above.</li> </ul>