



28 April 2006

Independent Gambling Authority
PO Box 67
RUNDLE MALL SA 5000

Dear Sir/Madam

Review 2006 - Regulatory Functions

The City of Port Adelaide Enfield is pleased to provide this submission to the Independent Gambling Authority's Review 2006 – Regulatory Functions.

Council considered its position at its meeting of 11 April 2006 and resolved to offer the following comment:

1. Section 2(1)(a)

The Gaming Machine Licensing Guidelines at section 2(1)(a) provide that, prior to completing an application for a gaming machine licence, the applicant should have consulted with the relevant local government council. The Guidelines do not specify set criteria or procedure for the consultation. In particular the Guidelines do not specify the amount of time that a local government council should be afforded to respond to a request for comment by an applicant.

Based on Council's recent experience of providing comment pursuant to section 2(1)(a) of the Guidelines a period of eight weeks from receipt of a written request would be reasonable. The suggested timeframe would provide a degree of certainty for the applicant and avoid raising the applicant's expectations which may be unrealistic for Council, taking into account internal processes and the practicalities of Council meeting cycles.

2. Section 3(1)

In relation to the determination process, the Gaming Machine Licensing Guidelines at section 3(1) provide that the Commissioner *should give consideration to inviting the participation of the relevant local government council and agencies with skills and expertise in responsible gambling or gambling rehabilitation*. Currently the need to do so is to be assessed on a case by case basis.

It is suggested that inviting participation from these parties be mandatory rather than discretionary. In practical terms this would mean replacing the words "*give consideration to inviting*" in the current provision with the word "*invite*".

The advantage of the Commissioner being required to seek comment as part of the determination process is that Council and others invited to participate would have the opportunity to view the relevant sections of the completed application; whereas in the case of the first step there is no requirement by the applicant to share the contents of the application. This would provide participants in the consultation process with the opportunity to provide comment with all available information taken into consideration.

It is suggested that, as with responding to an applicant's request for comment prior to lodging an application with the Commissioner, an eight week response period would also be reasonable in this instance.

3. Second stage issues – venue signage

Council agrees that in relation to on- and in-venue signage discreet and minimalist signage only should be allowed. As to how that might be specified, Council is pleased to provide a copy of its Signs Policy. While this policy does not address the signage of gaming venues in particular, it may be of some value to the Review by way of an example.

If you need any more information or would like to discuss this further, please contact me on telephone 8405 6778.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mal Jonas', written over a thin horizontal line.

Mal Jonas
Director Corporate & City Development

2.12 Signs Policy

Responsible Department*	Environmental Services
Date of Adoption	21 March 2001
Minutes Reference	GSC 113
Relevant Procedures	No
Related Policies	

PURPOSE

To encourage the innovative, thoughtful and pertinent use of signs which form an integral part of the urban environment.

To curb excesses and provide positive guidelines on the desired future character of signs for the city to developers, the community and Council.

PRINCIPLES

Council has an ongoing commitment and desire to improve the visual appearance and amenity of its urban environment.

DEFINITIONS

“Advertisement” or “Sign” means:

an advertisement and or sign that is visible from a street, road or public place or by passengers carried on any form of public transport.

POLICY

1. The following signs should be avoided:
 - 1.1 Standing on the public footway, excepting newspaper and magazine headlines in wire cages, fixed flat against a wall.
 - 1.2 Attached to veranda posts, public utility or other poles, excepting specifically designed free-standing poles or where placed by a responsible public authority.
 - 1.3 Attached to, or supported by, fence and dividing walls.
 - 1.4 Displayed upon a carriageway, dividing strip or traffic island except those placed by the Council or a public authority to direct motorists or to inform motorists of some traffic restriction or hazard.
 - 1.5 On, or extending above, the main roof line of any building.
 - 1.6 Protruding over a carriageway.
 - 1.7 Protruding within 600mm of the kerb line.
 - 1.8 Having a clearance of less than 2.5m above a footpath.
 - 1.9 Protruding over a property in different ownership.
 - 1.10 Spectrograph or reflective signs in all zones except Centre Zones.

- 1.11 Directing to a distant point of sale.
 - 1.12 Off-site advertising in all zones except Centre Zones where off site advertising hoardings should not exceed 2m².
 - 1.13 On-site advertising attached to free-standing sign poles where not incorporated within the sign face area of identification signs.
 - 1.14 Within any parking area or on any driveway.
 - 1.15 Hand written signs.
2. All signs should comply with the following:
- 2.1 Signs should relate directly to the activity undertaken on the premises.
 - 2.2 Signs should enhance the amenity of the locality.
 - 2.3 Signs should reflect and enhance the scale and character of the locality.
 - 2.4 The message of signs should be clear, concise and informative.
 - 2.5 Symbols should be used in preference to words wherever possible to promote simplicity and legibility.
 - 2.6 No sign should obscure a portion of another sign.
 - 2.7 No sign should be constructed which would detrimentally affect the safety of the community or conflict with or obscure any traffic message.
 - 2.8 Signs should be constructed in sympathy with street planting. No trees should be lopped to allow for greater sign visibility.
 - 2.9 Signs should contribute to the visual interest of the streetscape, and should aim to be innovative, and informative.
 - 2.10 Signs should be in harmony with the design, scale and character of the buildings which form their background.
 - 2.11 Signs should not detract from or obscure any scenic view.
 - 2.12 Signs should be structurally and electrically safe.
 - 2.13 All signs should be constructed and sign written in a tradesman like manner in durable, weather resistant material.
 - 2.14 The principal sign on the premises should relate to the name and nature of the business or occupier. Identification of goods and services should be secondary.
 - 2.15 Sign supports should be minimal and as unobtrusive as possible.
 - 2.16 A maximum of 10% of total exposed wall area should be sign written.
3. Free-standing signs should comply with the following:
- 3.1 Total height should not exceed 6m.
 - 3.2 Total area of each sign face should not exceed 6m².
 - 3.3 Double-sided signs should be identical in dimension and both sides should be less than 300mm apart.
 - 3.4 On-site advertising should not exceed 25% of the identification sign face.
 - 3.5 One sign pole only should be erected per site, except:
 - 3.5.1 where the frontage of the site exceeds 40m the height of any free-standing sign may be increase at the rate of 1m of every additional 10m of frontage or part thereof up to a maximum height of 10m and the sign face of the sign may be increased by 1m² for every 10m frontage or part thereof up to a maximum sign area of 10m².
OR
 - 3.5.2 An additional free-standing sign of not more that 6m in height and 6m² in sign area may be erected.

Signs Policy, Cont'd.

4. Portable signs should comply with the following:
 - 4.1 Should be displayed on private premises.
 - 4.2 One sign only should be displayed per premises.
 - 4.3 Total area of each sign face should not exceed 1m².
 - 4.4 Signs should not be placed at a greater distance than 2m from the nearest point of the main building on the premises.

5. Identification signs should comply with the following:
 - 5.1 Should be simple, aesthetically pleasing and innovative.
 - 5.2 Joint tenants should share free-standing identification signs wherever practicable.
 - 5.3 Identification signs within complexes should be co-ordinated in size, colour and appearance.
 - 5.4 Under canopy box signs should comply with the following.
 - 5.5 Total area of each sign face should not exceed 1.8m x 300mm.
 - 5.6 Only one sign per premises should be displayed.

RESIDENTIAL ZONES

Signs are not considered to be in conformity with the subdued discreet and restful character desired in residential zones.

The following general guidelines apply in all residential zones:

- Signs should be subdued and discreet;
- Signs should not detract from the amenity of a residential locality.

CENTRE ZONE

Centre zones have been designated to facilitate the rational, economic and convenient provision of shopping, office, administrative, cultural, community, entertainment, education, religious and recreational facilities within the City.

All signs in Centre zones should therefore reflect this character and aim to inform local residents not only of goods and services available but also of events of local community interest and general information regarding their locality.

Guidelines

Centre zones are pedestrian oriented and signs should reflect this scale by being smaller than signs in commercial and industrial zones and reflect the intimate, human scale of Centres.

The individual nature of centres should be encouraged and highlighted by the use of themes throughout the centre. For example, all signs in a particular centre could agree upon a distinctive colour scheme and style of sign to integrate the centre and give it a distinctive character.

Community affairs bulletins and similar signs are encouraged.

Wall murals depicting community activities are encouraged in Centre zones.

Signs Policy, Cont'd.

Under canopy box signs should be used as the major form of identification, where appropriate.

INDUSTRIAL ZONES

The character of industrial zones within the City of Port Adelaide Enfield has changed over recent years, particularly in relation to the development of prestigious industrial premises in the Regency Park Industrial Estate.

This area is now characterised by medium and large scale development of a high standard and a sign policy for the area must reflect the standard of recent and proposed future industrial development within the Council area.

Guidelines

Industrial areas offer scope for the bold and imaginative use of signs on a larger and less restrained scale than considered suitable in other zones.

Industrial signs are directed towards the motorist and therefore should be bold, colourful and simple.

Identification signs painted on, attached to, walls are considered appropriate. Graphics representing the activities undertaken on the site or the goods manufactured could also be considered appropriate.

Signs should be dispensed with and the activity inside exposed by transparent walls where the activity is particularly interesting.

Manufactured goods could be aesthetically displayed outside the premises in lieu of signs.

COMMERCIAL ZONES

Signs form an integral part of commercial zones and play a major role in giving them a distinctive character, as well as serving their primary function of identifying premises.

The proliferation of signs along the major arterial roads has become self-defeating over recent years with the over use of signs resulting in a cluttered effect with low legibility.

The development Control principles aim at a co-ordinated approach to the display of signs which will result in equal viewing rights, maximum legibility and a pleasing aesthetic appearance, with no signs dominating the environment.

Guidelines

Signs in Commercial zones are designed to be read by motorists and should therefore be bold and simple.

The use of symbols or logos promotes legibility and easy recognition.

As few signs as possible should be used to identify premises.

On-site advertising should be kept to a minimum, off the street alignment and preferably attached to buildings on the site.

General Design Guidelines

Legibility of signs is of prime importance and the following principles will ensure maximum legibility:

- In general, a combination of upper and lower case letters is easier to read than just capitals;
- Letters should not be too closely spaced or they tend to merge and be less readable from a distance;
- Medium thickness of lettering is more legible than either thin or thick lettering;
- Elaborate, ornate or "Olde English" style of lettering is harder to read than simple everyday letters;
- Most signs are designed to be read by the motorist; and
- In general, letters should be 25mm high for each 15mm of distance away from the words.

Another important element of legibility is colour combinations. The Outdoor Advertising Association of America has tested and ranked the following acceptable colour combinations from 1 (highest visibility) to 17 (least visibility).

1.	Black on yellow	10.	Brown on white
2.	Black on white	11.	White on brown
3.	Yellow on black	12.	Yellow on brown
4.	White on black	13.	Red on white
5.	Blue on white	14.	White on red
6.	White on blue	15.	Red on yellow
7.	Yellow on blue	16.	Yellow on red
8.	Green on white		
9.	White on green		

Messages should stand out against their background for maximum legibility. This can be achieved by keeping the background of the sign clear of image. It is recommended that the background area should be about 60% of the available space and the message should occupy about 40%.

DELEGATION

Nil

Signs Policy, Cont'd.

LIST OF AMENDMENTS

Date	Authorised by	Minute Reference
10 February 2004	Council	CL 415
1 March 2005	Council	CL 1055