

Submission to Essential Services Commission - CHW PR23



Price Submission 2023-28

30 September 2022



Contents

| | | |
|----|---|----|
| 1 | EXECUTIVE SUMMARY | 2 |
| 2 | INTRODUCTION | 2 |
| 3 | COUNCIL RESOLUTION – FEBRUARY 2022 | 3 |
| 4 | GROWTH – LAND AVAILABILITY | 3 |
| 5 | NORTHERN GROWTH AREA | 5 |
| 6 | EMPLOYEMENT - BWEZ | 7 |
| 7 | IDENTIFIED PROJECTS / TIMING RISKS | 7 |
| 8 | NEW CUSTOMER CONTRIBUTIONS | 10 |
| 9 | COMPARISON WITH OTHER WATER AUTHORITIES | 11 |
| 10 | CONCLUSION | 11 |
| 11 | SUPPORTING DOCUMENTATION | 13 |

1 EXECUTIVE SUMMARY

Following our review of CHW PR23 and combined with our experiences in the failure of CHW PR18 to successfully deliver infrastructure to support Ballarat growth we suggest that:

- CHW PR23 should support all three of the City of Ballarat's endorsed growth areas
- The VPA are currently undertaking a strategic review of Ballarat's apparent land supply crisis
- Fragmented ownership, significant development constraints in the North Growth Area and high demand (especially in the Lucas – North West - and Western Growth Areas) present a real risk to the provision of minimum 15 year diversified residential land supply
- The employment hub of Victoria's largest regional centre, BWEZ, cannot currently provide adequate water services for large water user industry despite its continued growth and development
- The current CHW PR23 Capital Expenditure will realise a reduction in land supply for Ballarat
- Projects required to underwrite Ballarat's growth into the three identified growth areas have been deferred to the first two years of the PR28 creating significant risk to meeting Ballarat land supply requirements
- It is unjust to introduce New Customer Contributions (NCC) to land parcels within the current growth areas, however, these NCC's provide a great opportunity to introduce an equitable system that enables delivery of major infrastructure in new growth areas at minimal cost to Central Highlands Water.
- The immediate need for the delivery of major infrastructure to all three growth areas in Ballarat is vital to ensure land supply is maintained
- Ballarat's proposed spend is significantly lower than comparable water authorities and does not reflect the requirements of a large regional centre with sustained high growth rates
- There are multiple options, including interim solutions, available to enable the provision of more greenfield residential land in multiple growth areas that should be provided for in CHW PR23

2 INTRODUCTION

The assets identified for inclusion within the Capital Expenditure for Growth Infrastructure in CHW PR23 do not fulfill the requirements for servicing City of Ballarat, identified growth areas and risk repeating recent shortcomings in the provision for infrastructure to accommodate population growth in Ballarat and providing a minimum 15 year land supply to the region.

Whilst CHW PR18 saw Capital Expenditure of \$158m, 8% above the original budget allowance, it failed to deliver three required growth infrastructure projects.

Ballarat's strong population growth, coupled by the failure to deliver these three growth projects valued at \$34m (which have been rolled over to CHW PR23) required an estimated \$40m worth of privately / developer funded infrastructure to be constructed to facilitate the delivery of sufficient titled land to meet demand in the growth areas of Ballarat.

A significant amount of proposed capital expenditure in CHW PR23 will service approximately 70% of the currently un-serviced section of the existing Ballarat West UGZ (zoned land).

Much of this capital expenditure was proposed in CHW PR28 which reinforces the need for CHW PR23 to provide for diversity in the provision of sufficient Ballarat Land Supply.

The introduction of Network Contributions, while supported in principle, will significantly diminish the appetite for the development community to continue to financially contribute to any infrastructure required to service growth areas.

Furthermore, the previously zoned areas of Ballarat West and the Ballarat West Employment Zone (BWEZ), which provides the basis for employment land within the municipality and is forecast to accommodate 9,000 jobs for the

region, are still yet to be fully serviced, creating significant service performance risk for current Ballarat residents and strategically supported growth areas.

While similar sized Water Authorities appear to have identified the risks associated with neglecting to accommodate demand, the current CHW PR23 only contemplates the provision for servicing of the significantly constrained Northern Growth Area and the highly fragmented residual land within the existing Ballarat West Growth Area, failing to acknowledge the economic contribution of the North Western Growth Area and Western Growth Area which have been the engine room for residential growth and investment over the last decade.

3 COUNCIL RESOLUTION – FEBRUARY 2022

The continued and rapid population growth in Ballarat and the subsequent land supply crisis have been highlighted by the City of Ballarat (COB) in a Council Officer report to the Council meeting of the 23rd February 2022.

“At the meeting of 16 September 2020, Council acknowledged limited greenfield land supply as the existing Ballarat West growth area develops. The need to expedite planning for growth areas is a priority as the city is projected to grow to 185,000 by 2040-41.”

“Without planning for additional land, growth area supply will effectively exhaust from 2025-26 from when lot production per year will decrease significantly to the low 100s per year.”

In response to the immediate land supply crisis in Ballarat, City of Ballarat formulated the following resolution, which was unanimously accepted by the Councillors, at its February 2022 meeting:

Apply to the Minister for Planning in accordance with Section 8A (2) and (3) of the Planning and Environment Act 1987 to obtain authorisation to prepare Amendment C221ball to the Ballarat Planning Scheme, by:

1. **a) rezoning the growth areas to the Urban Growth Zone in accordance with Attachments E, F and G; (Attachments E, F & G identified the Northern Growth Area, North Western Growth Area and the Western Growth Area) and**
b) preparing a policy amendment which introduces a new ‘Housing Framework Plan’ to support the next phases of planning.
2. *If authorised by the Minister for Planning under Section 8A (2) and (3) of the Planning and Environment Act 1987, exhibit Amendment C221ball to the Ballarat Planning Scheme in accordance with the notice requirements under section 19 of the Planning and Environment Act 1987.*
3. *Commence preparation of a Precinct Structure Plan for the northern growth area following application of the Urban Growth Zone.*
4. *Notes that the Ballarat Housing Strategy should ultimately be the mechanism to determine the extent of future growth and infill development across Ballarat.*
5. *Authorise the Director Development and Growth to make minor changes to the planning scheme amendment documentation as required. 6. Notes that the ‘Growth Areas Framework Plan’ will be prepared to establish the most appropriate sequencing of Precinct Structure Plan preparation for the western and north-western growth areas, aligned to sustainable development principles and the likely or planned construction of infrastructure and community facilities to support well-planned and sustainable communities.*
7. *Report back to Council, quarterly, on the progress of the rezoning to UGZ and the project plan including timeframes for the Growth Areas Framework Plan.*

4 GROWTH – LAND AVAILABILITY

Integra are a multi-generational, Ballarat based, community focused, family-owned business with a reputation as one of Regional Victoria's prominent property developers, leading the way in sustainable design, innovation and

lifting the standard of development of new communities in Ballarat and other regional areas across Victoria. We pride ourselves on creating communities we would be proud to live and work in ourselves. Our company is intricately involved with the supply and delivery of residential land in Ballarat over the last 20 years leading the way in masterplanned communities. Past projects by Integra include:

- The **Ballarat Golf Club** Redevelopment known as “Insignia”, which set the benchmark for new development in Ballarat and won multiple stormwater innovation and heritage awards;
- **Canadian Lakes Estate**: the first development in regional Victoria to implement “Water Sensitive Urban Design”. The Estate won the prestigious Urban Development Institute of Australia’s (UDIA) “best development award” and;
- **Macarthur Park Estate** at Miners Rest which also won a stormwater innovation award for its rehabilitated waterway and renowned wetlands.
- **Lucas Estate**, which encompasses the entire Alfredton West Growth Area and currently provides 1 in 3 of every house built in Ballarat and generates \$140m worth of economic benefit to the City of Ballarat per annum.

Integra’s knowledge of the Ballarat property market and independent analysis of the demand for residential land within our city, support CHW PR23’s assessment that there are “underlying and sustained forces for increased growth rates above the long-term trend” and we therefore agree with the adoption of a 2.5% growth rate when estimating future demand.

Using the average household size of 2.3 people per house identified in 2019 Victoria in Future (VIF), the demand for residential lots can be calculated as follows:

| | |
|---|---------------|
| Existing Population – Ballarat | 113,000 |
| 2.5% growth pa compounding over 15years | 3,377 average |
| Residential Lot Demand pa (at 2.3 people per household) | 1,470 average |

While the VPA are currently performing a demand v supply assessment for Ballarat, current DELWP Regional Greenfield (2022) data indicates there is 8,800 lots remaining to be sold within the current greenfield growth areas and a further 1,000 infill lots (see Table 1 below):

Table 1.0 - Estimated retail lot supply, June 2022.

| Town/Area | Development Type | Unzoned | Zoned |
|---|------------------|---------------|--------------|
| Alfredton/Lucas and Southwestern Growth | Greenfield | 18,440 | 8,099 |
| Brown Hill | Greenfield | 0 | 634 |
| Miners Rest | Greenfield | 6,190 | 0 |
| Remainder | Greenfield | 0 | 80 |
| Greenfield Total | | 24,630 | 8,813 |
| All | Major infill | 0 | 1,032 |
| Total | | 24,630 | 9,845 |

It is therefore estimated that there is approximately 6.7 years supply. This is reasonably aligned with CHW PR23 which claims 7 – 9 year current supply, however, DELWP also advise that “the rate at which greenfield land can be developed into houses can also partly depend on the characteristics of englobo lots. Large englobo lots, such as those over 10 hectares, can be easier to assemble and service.”

The remaining lot supply for Ballarat is substantially fragmented and therefore the economic efficiency to develop such parcels is substantially compromised.

The small and fragmented land parcels in the existing Bonshaw Growth Area (Precinct 1) challenged and protracted the provision of suitable infrastructure to support the delivery of titled land.

COB has acknowledged this constraint in their land supply assessment:

“Council has adopted the Department of Environment, Land, Water and Planning’s (DELWP) Urban Development Program (UDP) methodology. However, it is important to note that UDP methodology considers that zoned residential land that is fragmented or constrained is still counted as contributing to supply.”

An assessment of the residual greenfield land identified above can be summarised in the DELWP Regional Greenfield (2022) data as follows:

Table 2.0 - Estimated retail lot yield by englobo lot size

| Lot Size | Total Lots | Englobo Lots | Proportion of Lots |
|---------------|------------|--------------|--------------------|
| Less than 1ha | 602 | 66 | 6.8% |
| 1-3ha | 2081 | 104 | 23.6% |
| 3-5ha | 1291 | 27 | 14.6% |
| 5-10ha | 1947 | 20 | 22.1% |
| 10ha or more | 2892 | 11 | 32.8% |

Therefore, the zoned land readily available for development within Ballarat (i.e., land above 10ha in size) provides just over **2 years supply** based on a required demand of 1,470 lots per annum.

These tables clearly demonstrate the ‘immediate’ challenge of providing suitable land supply in the short-medium term to facilitate historic sales rates and continued rapid growth.

5 NORTHERN GROWTH AREA

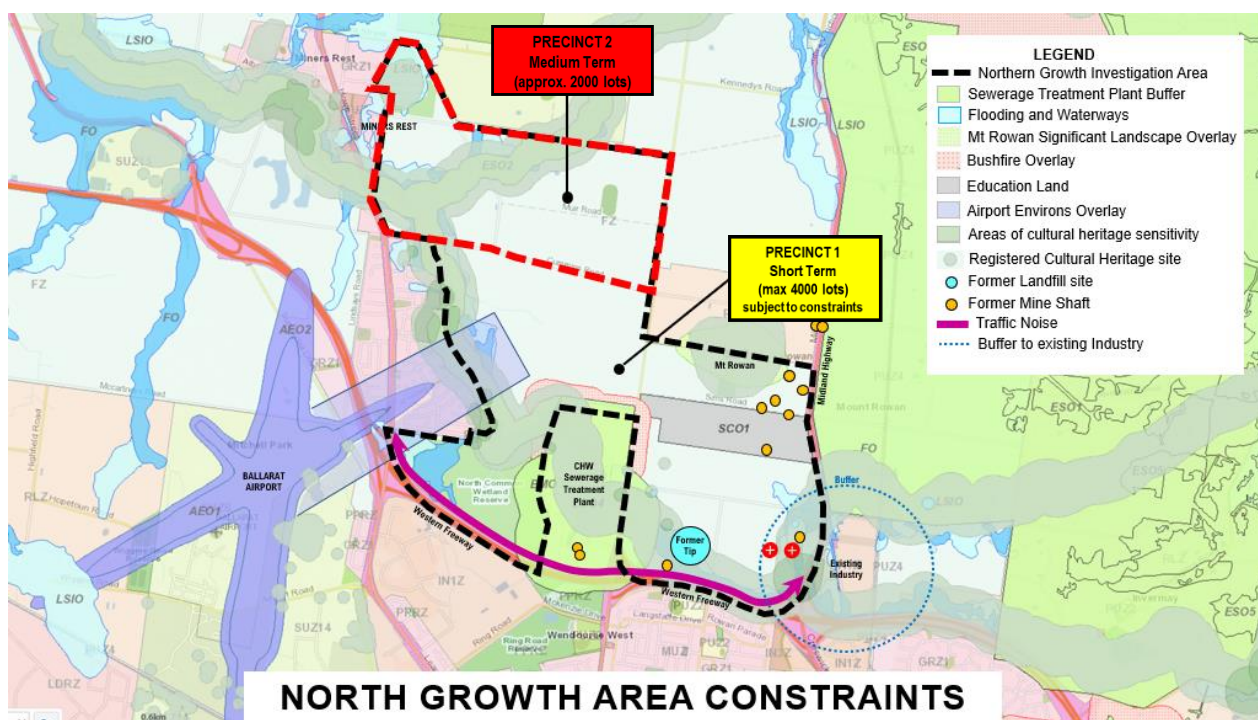
CHW PR23 contemplates servicing only the Northern Growth Area out of the three identified growth areas nominated by the Council Resolution of February 2022.

Servicing the Northern Growth Area only is incredibly risky given the significant constraints the growth area holds (estimate to yield approximately 4,000 lots within the currently approved boundaries), the significant supply issues confronting Ballarat and the intention of the Council to rezone all three growth areas within the 5 year window of CHW PR23.

The key constraints for the Northern Growth Area include:

- The Ballarat North Wastewater Treatment Plant is situated centrally in the GIA and its buffers are problematic for land development. This treatment plant may expand in the future requiring extended buffers.
- Extensive areas of land are affected by waterways. Development along the lineal waterways will need appropriate setbacks which will further impact on development potential.
- Large areas of the Northern Growth Area are prone to flooding along Burrumbeet Creek.
- There is a significant area of Aboriginal Cultural Heritage Sensitivity along the Burrumbeet Creek.
- The Northern Common cannot be developed (i.e., crown land).

- There is a former landfill/Tip Site which will generate adverse environmental conditions for residential development. Extensive environmental testing will be required in the vicinity of the former landfill to ensure soils have not been contaminated via leaching contaminants.
- Sound attenuation will likely be required along the Western Freeway in accordance with VicRoads and EPA requirements.
- The land is adversely affected by industrial buffers from existing industrial activities to the east.
- The land is affected by historical mining activities.
- Mt Rowan is protected by a significant landscape overlay and residential development is not supported on these Newer Volcanic cones.
- The site does not have convenient access to existing Community Infrastructure.
- Lack of vehicle access across the Western Freeway.



Current experience in developing residential land in Ballarat suggests post a 9–12-month planning process (excluding rezoning) it is an 18–24-month timeframe from design through construction to obtain titles. Consequently, when considering the degree of current fragmentation of zoned land and the time-lapse required to bring 'unzoned' land to the market, Ballarat is in a precarious short-medium land supply position and desperately needs to 'fast-track' the provision of additional currently unzoned land.

CHW PR23 must make provision to provide sewer and water supply infrastructure to support the northwest and west growth areas in some capacity to add critical land supply in the short-medium term.

6 EMPLOYEMENT - BWEZ

The Ballarat West Employment Zone is situated adjacent the Northwestern Growth Area and is in central proximity to the Western and Northern Growth Corridors of Ballarat. The following diagram illustrates the importance of BWEZ to 'link' the North and North West Growth Areas.



The Central Highlands Regional Growth Plan (2014) advocates:

Employment:

“The development of the Ballarat West Employment Zone will be the key driver for a potential 9000 new jobs within the next 20 years.”

“The Ballarat West Employment Zone should be developed as the region’s landmark location for employment and industrial growth, including a freight hub and research and development centre. Any new employment opportunities should have good links to key transport routes and residential areas.”

Stages 2 of BWEZ is scheduled to be completed in 2024 with Stage 3 and 4 currently being advertised for expression of interest with anecdotal evidence of strong activity from major industry.

Neither CHW PR18 nor the current proposed CHW PR23 provide for infrastructure upgrades required to service large water user industries in Stages 2, 3 or 4.

BWEZ is zoned and under construction, yet it is not fully serviced, nor planned to be fully serviced within the next 5 years, creating a major query over the relevance of the current water plan.

The inability to potentially provide suitable water supply to BWEZ, a major employment driver, would be catastrophic for Ballarat and the State Government philosophy in providing a mechanism for continued and enhanced industrial growth and the subsequent employment opportunities for the region.

7 IDENTIFIED PROJECTS / TIMING RISKS

CHW PR23 clearly identifies the need for Capital Expenditure to service all of the growth areas, stating "Future Proofing is Key. CHW has a critical role to play in providing services to a growing population" (see table and plan extracted from pages 76 and 77 of CHW PR23), however, the delivery of some of the sewer and water

infrastructure projects required to service BWEZ, the Northwest and Western Growth Areas have been forecast for 2028 and 2029 delivery (first two years of the next Water Plan).

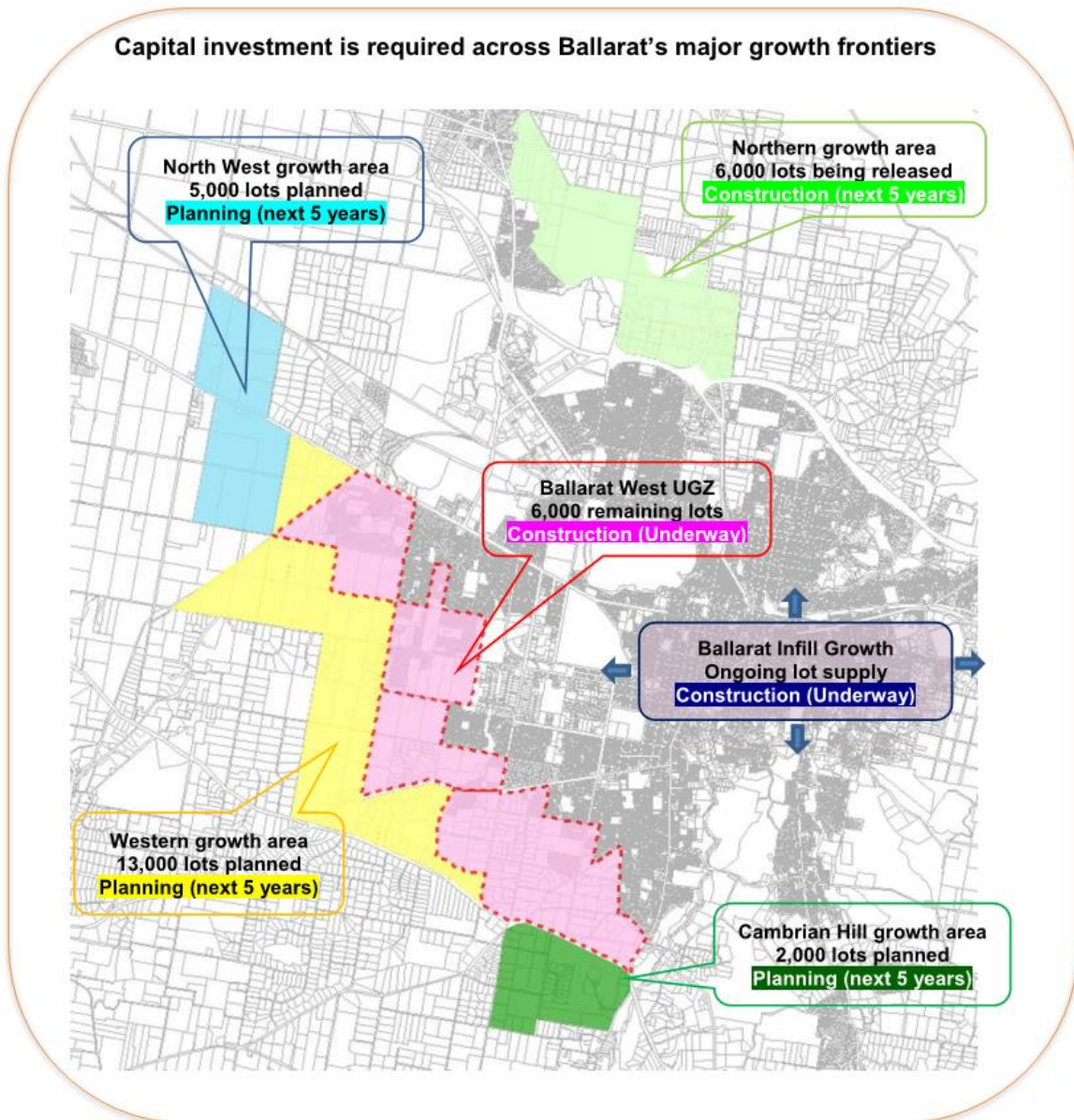


Table 15.1 Forecast capital expenditure by cost driver (\$m 2023)

| Cost driver | 2023-24 | 2024-25 | 2025-26 | 2026-27 | 2027-28 | 2028-29 | 2029-30 | 2030-31 | 2031-32 | 2032-33 |
|---------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Renewals | 9.7 | 9.9 | 12.1 | 12.0 | 16.0 | 17.2 | 16.6 | 19.1 | 15.4 | 20.3 |
| Growth | 18.1 | 15.3 | 19.7 | 28.4 | 29.1 | 59.4 | 55.2 | 31.9 | 20.6 | 28.0 |
| Improvements & compliance | 18.2 | 22.8 | 18.2 | 13.6 | 12.9 | 22.0 | 23.4 | 17.2 | 19.1 | 18.6 |
| Total | 46.0 | 48.0 | 50.0 | 54.0 | 58.0 | 98.6 | 95.2 | 68.2 | 55.1 | 66.9 |

CHW PR23 explains “Table 15.1 also shows a marked increase in expenditure on growth-servicing assets (and total expenditure) in years 1 (2028-29) and 2 (2029-30) of the following pricing period, PR28. This is due primarily to a number of major water and sewer network projects identified to support Ballarat’s current and proposed growth zones. CHW has adopted the prudent approach to defer these projects from the PR23 period to the PR28 period and accept the risk if these projects need to be brought forward”.

Given the current and projected growth rates, constrained land availability and lagging infrastructure provision (evidenced by the private investment in infrastructure during CHW PR18, equivalent to 25% of the entire capital expenditure made during the 2018PR), it is our strong opinion that this is not a prudent approach but rather a high risk approach, especially given the available opportunity to recover costs for growth area infrastructure by way of new Network Contributions (NCC’s).

The diagram and Table 3.0 below provides an illustrative timeline showing the real risk to supply of residential land in Victoria’s largest Regional Centre based on the provision of major sewer and water infrastructure:

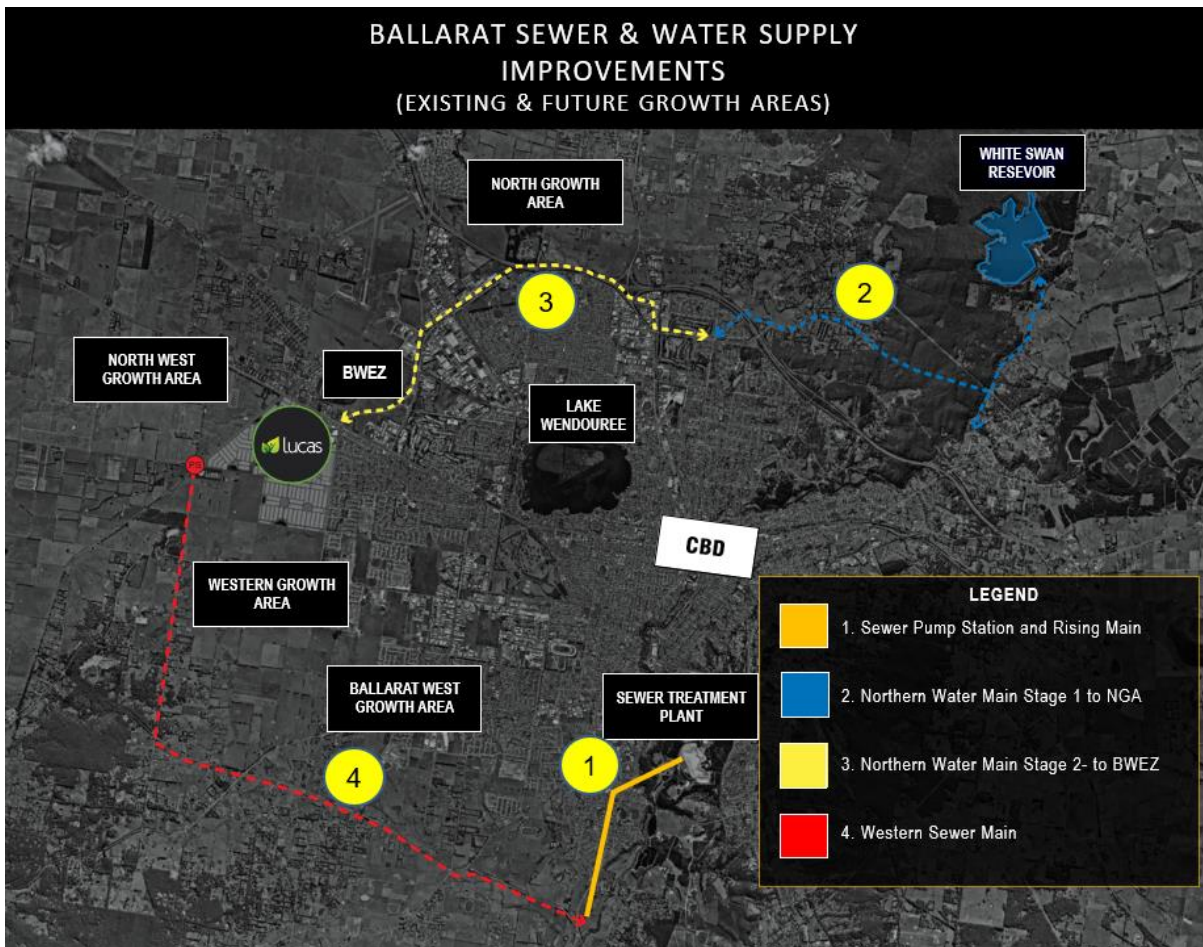


Table 3.0

| | | | | NGA (4000 lots) | | | NWGA / WGA (24000 lots) |
|---|--------------|--------------|--------------|--------------------|--------------|--------------|----------------------------|
| | CHW PR23 | | | | CHW PR28 | | |
| Ballarat Greenfield Land Supply | 2023FY | 2024FY | 2025FY | 2026FY | 2027FY | 2028FY | 2029FY |
| Lots within Englobo Parcel less than 10ha | 5,900 | 5,606 | 5,312 | 5,018 | 4,724 | 4,430 | 4,136 |
| Lots within Englobo Parcel greater than 10ha | 2,900 | 1,724 | 548 | 3,372 | 2,196 | 1,020 | 23,844 |
| Total Greenfield Lots | 8,800 | 7,330 | 5,860 | 8,390 | 6,920 | 5,450 | 27,980 |
| Projects Required to Initiate Land Supply | | | | | | | |
| 1. Sewer Pump Station and Rising Main (Fragmented ownership to the south cannot be fully serviced until this project is completed) | | | X | | | | |
| 2. Northern Water Main - Stage 1 | | | | X | | | |
| 3. Northern Water Main - Stage 2 | | | | | | | X |
| 4. Western Sewer Main | | | | | | | X |
| <i>*Of the 1470 average annual sales (see section 2 of this submission), 20% have been attributed to the constrained englobo parcels & 80% to the readily available englobo parcels (over 10ha)</i> | | | | | | | |

The table above clearly shows that Major Project No 5 (Water Main) is required urgently the risk to maintaining service standards to the growing population of Ballarat is significant and too great to contemplate deferral of major works required to underpin supply for the Northwest and Western Growth Areas.

CHW PR23 sewer project (Major Project 10) will provide trunk infrastructure for most of the NGA to facilitate development; the subdivision of land is still reliant on the assumption that multiple private developers (fragmented) will fund connecting (potentially out of sequence) sewers and likely temporary pump stations; with CHW only funding the upsizing of pipelines. The potential 'upfront' costs to deliver out-of-sequence development of land in the NGA is a significant impediment to the reliance of land supply release in the north.

It should be noted that due to the previous construction of a large sewer pump station and storage facility with significant excess capacity located adjacent the North West Growth Area, there are a number of inexpensive interim sewer servicing solutions which would enable approximately 3000 lots in the NWGA to be serviced immediately.

8 NEW CUSTOMER CONTRIBUTIONS

The introduction of NCC's in CHW PR23 is supported in principle by Integra and the greater development community, however, the implementation of these contributions within the existing growth areas is inequitable.

There are a number of developers who have provided financial contribution towards CHW infrastructure to enable the development of their properties. The introduction of NCC's for future stages of these developments will be highly contentious.

There is also a competitive issue for some developments who have commenced under NOA's that do not include NCC's versus new NOA's which may involve NCC payments. One of the pillars of CHW PR23 is Equity, however, it does not appear equitable that the final stages of the currently zoned land, most of which is already highly

economically inefficient due to its fragmented ownership and lack of economy of scale, will pay NCC's towards infrastructure that was supposed to be delivered in previous Water Plans (\$34m worth of growth infrastructure rolled over into CHW PR23).

The ability to introduce NCC's into the new Growth Areas is far clearer and more equitable and could certainly be increased if required to compensate for assets which will accommodate the new growth areas, both established infrastructure as well as new capital expenditure; limiting the capital expenditure exposure for CHW.

The transparency and certainty that NCC's provides developers is encouraged. It is also noted that the provision of infrastructure to support the new growth areas will ultimately be borne by developers, facilitated through NCC's. Consequently, there is no tangible scenario that should delay the delivery of sewer and water supply infrastructure to support ALL three (3) growth areas as outlined in the City of Ballarat Council resolution.

The income from the NCC's proposed in CHW PR23 is expected to reach parity by 2028-2029, as most of the new development will be occurring in the new growth area. Subsequently if works were provided to allow for growth in the endorsed west and northwest growth areas an NCC could be developed for these areas in a similar vein. Depending on the rate required this could be facilitated through a separate charge. Preliminary costing indicates that the NCC rate would be similar.

9 COMPARISON WITH OTHER WATER AUTHORITIES

The CHW PR23 capital investment program proposes a \$256m spend (inclusive of \$34m in PR18 roll-over projects) to support approximately 161,000 residents, Table 4.0 shows a comparison of Water Authorities with similar populations.

Table 4.0

| Authority | Population | Proposed Expenditure |
|-------------------------|------------|----------------------|
| Central Highlands Water | 161,000 | \$256m |
| Gippsland Water | 147,000 | \$268m |
| Coliban Water | 160,000 | \$435m |

As a comparison with similar populations CHW PR23 is lagging. Considering our direct experience and the private investment in temporary infrastructure during CHW PR18 to ensure residential growth was able to be facilitated, the original draft program estimate of \$400m (Page 85 of CHW PR23) is a more prudent capital expenditure forecast and more readily reflects the adaption required to support the continued growth of Ballarat.

10 CONCLUSION

Based on the considerable private investment required to maintain supply of residential land to meet growing demand during CHW PR18, coupled with the requirement to service Council supported growth areas and achieve an equitable infrastructure program in comparison to similar sized water catchments, the forecast capital expenditure for growth infrastructure for CHW PR23 should be increased to include water main extensions from the Northern (Invermay) Water Supply Pipe to the North Western Growth Zone and Sewer main from Cuthberts Road to the southern sewer pump station (both infrastructure items which have been identified for delivery in the 2028 and 2029 FY - two subsequent years to CHW PR23).

This could be achieved in one of three ways through suitable funding provision in CHW PR23:

OPTION 1:

The VPA are currently undertaking a strategic review analysing Ballarat's green field and urban renewal opportunities and priorities to make recommendations regarding the timing for developments to ensure a minimum 15 year diversified residential land supply going forward.

As such, and in keeping with City of Ballarat's intention to rezone three growth areas as quickly as possible, the 2023PR could be amended to re-establish the capital works program, which was originally \$400mil as referenced on page 85 of the draft Price Review, to include water and sewer infrastructure required to service BWEZ, the Northwest and Western Growth Areas.

These major works are scheduled for 2028 and 2029, therefore, bringing the works forward by 2 - 3 years overcomes major risks associated with the dire land supply shortages for the region. These works could be really facilitated by the earlier introduction of revised NCC's, limiting CHW's capital expenditure funding exposure.

OPTION 2:

Substantially The Finchs Road Pump Station, coupled with some minor inexpensive down-stream alterations to established infrastructure, has capacity for a temporary sewer storage as an adequate interim solution to enable the first 3000 lots (approx..) of the Northwest Growth Area to be serviced for sewer.

The water upgrade (Northern Water Main) identified as Major Project 5 in the 23PR is scoped to "deliver major water supply augmentations across northern Ballarat to maintain service standards for existing customers in the Ballarat West urban growth area and to service new connections in the Norther Growth Area" within the first 3 years of the Price Review.

Given the size of the Northern Growth Area currently being rezoned has been reduced from 6000 lots to 4000 lots and has some significant constraints to overcome with regard to timing of delivery of residential land, it would be reasonable to assume that this Major Project will provide some excess capacity in the system in the short term while waiting for the ultimate water projects to be completed in the 28 / 29 years.

Therefore, to assist in alleviating some of the risk associated with the land supply shortage, approximately 3000 lots within the Northwest Growth Area could be serviced for minimal additional costs, and certainly under the new NCC environment which ensures no cost to CHW, easing the pressure of delivering the major infrastructure earlier than currently proposed.

OPTION 3:

Utilise the Sewer solutions mentioned in Option 2 above coupled with bringing forward the major water infrastructure projects that provide the ultimate solution for the Northwest and Western Growth Areas within the 2023PR.

This again would alleviate the risk to residential land supply shortage and the inability to service a major industry at BWEZ while only bringing a portion of the ultimate major projects forward by two years.

For further commentary, or if the opportunity to present to this submission is available, please contact the undersigned.



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11 SUPPORTING DOCUMENTATION

1. Ballarat Growth Area Attachment E – Northern Growth Area
2. Ballarat Growth Area Attachment F – Western Growth Area
3. Ballarat Growth Area Attachment G – Northwest Growth Area

