

***Kiama Municipal Council
Submission on Biophysical Strategic Agricultural Land (BSAL)***

Kiama Municipal Council appreciates the opportunity to provide comment on the mapping of Biophysical Strategic Agricultural Land (BSAL). The protection of high quality agricultural land in Kiama and within the Illawarra region is an issue paramount to the future planning of the region. Kiama's rural land is important for its productive capability, provision of flora and fauna habitat, and for the scenic qualities which enhance the attractiveness of Kiama as a living environment.

Whilst Kiama Council acknowledges the Government for introducing a draft mapping framework to assist proponents and landholders achieve balanced land use outcomes, particularly between mining, coal seam gas and agriculture, we are concerned that this process only goes part of the way towards ensuring that appropriate land use options are developed and that areas of high agricultural, environmental or cultural value are recognised and will receive long term protection.

Kiama Council considers that the criterion used to define BSAL is too broad. Given the geographic variability of lands across the state of NSW, there are inherent difficulties in applying definitive filters on a state wide basis. Kiama provides a good example of this in that the lands identified on the proposed BSAL map, predominantly alluvial flats, are the most productive lands within the LGA, however, they are certainly not representative of the majority of what Council would classify as "productive agricultural land".

The mapping in its current form has omitted large tracts of productive agricultural land that does not meet the specified criteria. In general, our rural lands have good soils, water and a climate, which is conducive to agriculture, however, much of the topography of the LGA exceeds the 10% nominated in the BSAL criteria. Under this categorisation productive agricultural land with high soil fertility and reliable access to water is excluded based on a slope, thus large areas of productive agricultural land will have no additional level of protection as a result of BSAL classification.

A more localised or regional approach to the BSAL mapping would result in a more effective identification of lands that should be classified as BSAL.

The impact of climate change does not appear to have been adequately regarded in the assessment process. With a projected average sea level rise of 3.2 millimetres per year, Kiama will be susceptible to the impacts of future sea level rise particularly dairy farms located on the Minnamurra River flats which can currently be affected by king tides. Adding to this is the impact of ocean salinity, which will affect the productivity and fertility of the current BSAL identified, alluvial flats. Conversely there is potential for certain lands to benefit from the impact of climate change. For this reason Council feels it is necessary to have greater consideration of the impacts of climate change when considering potential BSAL lands.

Whilst the potential long term impacts of new industries such as CSG extraction are not well understood, Kiama's concerns relate to the potential of future developments occurring outside the BSAL mapped areas to impact upon the health and productivity of both protected BSAL areas and other productive agricultural lands. BSAL does not have regard to one of the most critical issues, water and water security. Kiama's coastal location in conjunction with its geography in relation to the escarpment, ensure a reliable precipitation rate (mean annual rainfall of 1253mm), which largely contribute to its fertile farming lands. The effective use of this rainfall relies on an "all of catchment approach" and any development which depletes groundwater, alters the hydrology, damages aquifers and causes pollution within catchments are a major concern.. Kiama Council recommends that the proposed BSAL areas be increased to encapsulate water recharge areas, as well as water catchment areas.

Kiama requests that the methodology associated with BSAL include a regional component which is more able to identify lands that are significant in a "regional or local" context. The implications of not identifying all strategic agricultural lands are far-reaching and likely irreversible. While Local Government recognises the economic importance of mining activity, impacts on aquifer health, future food security and agricultural productivity generally must be addressed on a precautionary basis to ensure ongoing viability having regard to a much wider set of parameters than that used in the current BSAL mapping. To accept that the current methodology

gives sufficient identification of BSAL is simply incorrect and has the potential to lead to the degradation of what are currently highly valued agricultural lands.

Phil Costello
Director Environmental Services
Kiama Municipal Council