

THE COLONG BULLETIN

Bulletin 196

THE COLONG FOUNDATION FOR WILDERNESS LTD
PROTECTING WILDERNESS AND NATIONAL PARKS

January 2003

2/362 KENT STREET SYDNEY 2000 (ABN 84 001 112 143). TELEPHONE 02 9299 7341 FAX: 02 9299 5713 ISSN 1325-3336
EMAIL: foundation@colongwilderness.org.au WEBSITE: www.colongwilderness.org.au

Reserves or Resorts?

THE Colong Committee commenced as a purely reactive organisation, committed to saving the Kowmung Valley from being the site of a limestone quarry and saving the Boyd Plateau from being bulldozed to become a pine plantation. When these objectives were achieved the Committee became proactive by adopting three objectives – the Border Ranges National Park, the Greater Blue Mountains National Park and Kakadu. All three are now World Heritage listed.

When, in 1987, Bob Carr adopted our proposal for a Wilderness Act, there was only 321,800 of wilderness protected, somewhat weakly, by the National Parks and Wildlife Act 1974. The Foundation's objective was broadened to include the saving of all wilderness. About half of the States' substantial bushland remnants are now preserved as declared wilderness.

In the early days we concentrated on reservation rather than management, knowing that NPWS resources were limited, but funds for management have been increased more than fivefold, from \$42 million in 1995 to \$239 million last year. The objective of national parks – the preservation of the natural environment – could now be implemented, but this objective is being subjected to the interests of so-called "stakeholders". How anyone can have a stake in public land is not explained. The natural environment is being damaged by "stakeholders", such as development interests (as in Kosciuszko), 4WD drivers, horse riders, mountain bike riders and even helicopter operators. Wilderness is fragmented to accommodate the Bicentennial National Trail. In southern NSW much wilderness has been sacrificed to the above interests, although the Colong Foundation has sought an

continued on page 2

In this issue...

Reserves or Resorts	1
Parks for Mining	2
Feral Dogs, Horses and Pigs	3
Meeting Dates	3
Fifty Million and Bust	4
Resorting to Abuse and Malpractice	5
Plans Within Plans	6
New Town Plan for the City Within a World Heritage National Park	8
Management Plans for World Heritage Parks in Northern NSW	9
The Bells' Superhighway ..	10
The Alpine Cities	11
Donations	11
Writers Against Logging ..	11
Myall Lakes PoM	12
Protecting Kosciuszko's Ecology	12

WRONG ANIMALS SAVED

In an effort to appease animal lovers the NPWS is losing the race. Feral animal populations are expanding and biodiversity coming a long last.

NPA Journal August 2002

THE COLONG FOUNDATION FOR WILDERNESS

PATRON: The Hon. Dr. Neville K. Wran, A.C., Q.C.

DIRECTORS: Pat Thompson, L.C.P. (Chairman); Peter Princas, B.A., LL.B. (Vice-Chairman); Alex Colley, O.A.M., B.Ec., H.D.A. (Hon. Secretary); Albert Renshaw (Hon. Treasurer); Tim Cadman B.A. (Hons), M.A. (Cantab.); Guy Dunphy,

Peter Maslen, B.Sc.(Eng), B.Sc.(Botany); Jeff Rigby; John Sinclair, O.A.M.; Jim Somerville, A.M., F.C.P.A.; Henry Gold.

DIRECTOR: Keith Muir, B. Nat. Res. (Hons.) ASSISTANT DIRECTOR: Fiona McCrossin, B.Sc., Dip.Ed., Dip. Env. Studies

HON. PHOTOGRAPHER: Henry Gold HON. MAPPING DRAFTSMAN: George Elliott

HON. AUDITOR: Ernst & Young

BULLETIN DESIGN & TYPESETTING: Bungoon Technologies Pty. Ltd. Ph: (02) 9526 6199

Parks for Mining

FEW issues are more vexed than the issue of mining in areas of high conservation value. The Ranger Uranium Mine in Kakadu National Park is a classic example of this conflict between resource extraction and preservation. The NSW Government, with the creation of State Conservation Areas (SCA), has decided to move into this politically difficult territory and allow mining within conservation reserves. Previously, mining was restricted to State Recreation Areas, which did not adequately recognise conservation values and, in many cases, inappropriately emphasised recreation opportunities (e.g. Burratorang and Nattai SRAs within which recreation was prohibited by Sydney Catchment Authority regulation so as to protect stored waters).

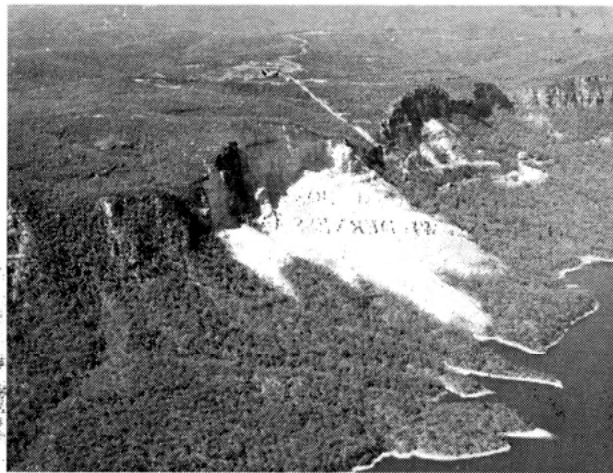
The creation of a SCA reserve category has been a hot topic in the conservation movement for decades. Some believe that only the areas with high mineral value remain to be reserved in NSW, while others think we are better off without SCAs because areas with modest mineral resource potential will be reserved as SCAs, not as national parks.

Reserves or Resorts?

continued from 1

administrative review of this decision by the NSW Ombudsman.

The preservation of natural areas remains the overriding objective of the Foundation, but much of our resources must be devoted to opposing the interests which seek to exploit these areas regardless of the damage they cause. The maintenance of our office and staff is essential for successful campaigning and once more we call on our valued supporters to renew their annual subscriptions and add a donation, if affordable. ■



This massive cliff collapse fell into Warragamba Dam in the early 1970's as a result of coal mining. The area is now within the Burratorang State Conservation Area but the new reserve offers no additional regulatory mechanisms that will prevent similar disasters in the future.

Environmentally sound mining is nowhere in sight

As has been seen at the Ranger Uranium Mine, the creation of parks with mines in them does not resolve anything but rather places the mining activity under a more intense scrutiny. But will such attention to detail be required for mining activities within these new conservation reserves?

A memorandum of understanding (MoU) between the Department of Mineral Resources and the National Parks and Wildlife Service has been signed that secures their respective bureaucratic turf and specifically avoids any increase in openness and transparency for mining in these controversial areas. Under the MoU a Minerals Advisory Group of public servants will freely exchange information between these two bureaucracies.

The hard stuff, how to regulate exploration and mining in a conservation area, was deferred to an Environmental Impact Assessment Protocol, a document on which environment groups were given only a few days to provide comment. The draft 'Protocol' was a classic cookbook report that allows all sorts of exploration activities such as road building without any environmental assessment. The envi-

ronment groups rejected the 'Protocol' and requested further negotiations in a bid to ensure a more sensible outcome.

The best chance for success of the State Conservation Area reserve is to ensure these areas are not compromised twilight zones, but areas illuminated by comprehensive natural resource data, close attention to administrative details and provided with opportunities for conflict resolution. Environment groups have requested that the recently made Memorandum of Understanding be revisited to ensure natural resource data SCA reserves is

upgraded, community-interest groups are represented on the Minerals Advisory Group and transparent conflict resolution processes regarding matters of policy and administrative process are established.

The Minerals Council of NSW wants all forms of mining to be permitted in State Conservation Areas, including open cut mining. Under the draft 'Protocol' and MoU it is nature conservation that is to be compromised, not mining opportunities.

The 'Protocol' does not overcome the exemption that mining receives from the *Environmental Planning and Assessment Act 1979* once a mining lease is made. This means that the public cannot defend a State Conservation Area reserve in court from mining damage arising from breaches to development consent conditions.

The environmental impact assessment 'Protocol' needs to avoid or minimise environmental impacts through environment group involvement in management of exploration activities in particular. The current draft 'Protocol' provides no additional environment protection, assessment, public participation or controls on exploration or mining. This thoughtless business as usual approach ensures a very rocky road for the new reserves. ■

Feral Dogs, Horses and Pigs

The General Purpose Standing Committee of the Legislative Council has published its very thorough report on feral animals. The report covers the Colong Foundation's concerns on dogs, horses and pigs.

From the submissions of western graziers it is evident that there is no possibility of preserving the dingos in western NSW, unless perhaps by fencing their habitats. The Wild Dog Destruction Board stated that there is very little justification to have any population of wild dogs in western NSW. The NSW Agriculture Dept. and the NPWS do however propose a means of preserving the dingo: This was:

Dingo conservation is most feasible in large reserves where further hybridisation with domestic dogs can be minimised. There is also less likelihood of dogs moving out of the core areas to attack livestock... The NPWS and State Forests NSW collectively manage about 8 million hectares of public land, parts of which are potentially suitable for this purpose... The Rural Lands Protection Act requires public land managers to eradicate... pest animals to the extent necessary to minimise the damage to all land... This effectively allows the option of 'no dog control' to become an acceptable method of meeting this obligation within the core of these "wild dog management areas."

In the Brindabella region, the Brindabella and Wee Jasper co-operative wild dog program has resulted in a 68% reduction in stock losses over a trial year period. This result has been achieved by baiting and trapping, mostly outside the Brindabella and Kosciuszko National parks. It might be possible to focus such a program on the elimination of the dogs which attack stock.

The report succinctly summarises the adverse impact of feral horses on the environment as: acceleration of erosion, trampling and overgrazing, fouling of water holes, collapsing of wildlife burrows, restriction of the

distribution of native fauna through competition for food and shelter and spread of weeds through dung or on the mane. Despite this realistic assessment of the impact of feral horses, there is no recommendation on the method of elimination. It is simply recommended, "the NPWS regularly monitor the impact of horses in national parks and develop an effective and humane management system." Dr. Tony English, of the Faculty of Veterinary Science, University of Sydney, has recommended shooting as the only humane method of control. He was asked to report in regard to mustering. He reported that appropriate terrain, well sited yards and experienced riders were prerequisites for success. Once mustered or trapped they are transported away in a vehicle, most of them taken to abattoirs for slaughter as pet food. Dr English noted that "those in the community who are passionate advocates of mustering rather than shooting should at least think about the animal welfare implications of that approach."

On pig dogging the Standing Committee recommended "the Minister for Agriculture take action to enforce a total ban on the practice of pig dogging and the illegal movement of pigs." Enforcement of the ban may prove impossible. As the Chairperson of the Newrybar Swamp Feral Pig Management Committee stated: "Four wheel drives turn up in the middle of the night with spotlights and their dogs. They get out, then they go ranting and raving through the bush." Because they came at all hours of the night it was not possible to get registration details. A lot of the dogs were taken from pounds and many are left behind.

Dogs and horses are the main immediate concern of the Colong Foundation, but the report lists rab-

bits, foxes, pigs, dogs, goats, deer, horses and cats as damaging feral animals. Penny Olsen of the Commonwealth Bureau of Resource Sciences notes that introduced animals cost the nation hundreds of millions annually in lost agricultural production and conservation expenses. The Hon Richard Jones, Chairman of the Committee, writes in his foreword: "Feral animals threaten our native environment by destroying native plants and by preying upon and competing with native animals, they cause land degradation and are a serious potential threat for the spread and distribution of exotic diseases." The primary recommendation of the inquiry was to make the Pest Animal Council, now an 'ad hoc' advisory committee, a statutory body, responsible for integrated regional feral animal management across the State. ■

MEETING DATES

*Meetings will be held
at 2 p.m. in our Kent
St. office on January
30th., February 13th.
and 27th., and March
13th. and 27th.*

Forests Destroyed to Make Paper

When a logging company goes to work on an old growth forest, they don't just choose a tree here and a tree there and then cut it down. No, this is wholesale devastation. **Everything standing** gets cut down. Anything left gets firebombed. Every bush. Every sapling. Even fern. Sometimes they even poison the area to kill any remaining animals. This isn't just logging. This is complete and utter destruction... To what end? To turn most of it into woodchips and ship it overseas to make **paper**.

PS. If arsonists were to firebomb the forests they'd be gaoled.

Don Henry, Executive Director of the ACF, in an appeal for funds.

50 MILLION AND BUST

Future dilemmas left on the horns

by Alex Colley

Incorporate into the cost of food, fibre and water the hidden subsidies currently borne by the environment.

Wentworth Group of 11 scientists' urgent recommendation no. 5.

THE *Oxford Dictionary* describes a dilemma as "a position which leaves a choice between equal evils." The CSIRO's Working Paper "Future Dilemmas" describes options for Australia's population, technology, resources and environment. It covers three population scenarios, the base case scenario which would result from a net immigration rate of 70,000 a year, giving a population of 25 million by 2050, a zero scenario where the number of immigrants equals the number of emigrants, and an 0.67 per cent scenario where the rate of immigration was 0.67 per cent of the domestic population.

Many of the results of these scenarios are not difficult to forecast, for instance the 0.67 per cent scenario would require the equivalent of 90 cities the size of Canberra (mostly on the eastern coast, though this is not mentioned). Under all scenarios it would be necessary to reafforest and refurbish 10 to 20 millions of hectares of cleared land, and water extraction is expected to increase from 24,000, to 40,000 giganlitres a year under all scenarios.

Consumption of natural resources will result from two stimulants. Increasing affluence and improved lifestyle, and the drive for increased production, will ensure that pressure on natural resources increases even though the population is stabilised. Increased population will, as the paper's estimates quantify, further increase pressure on the natural environment. There is no question that most of our natural resources, such as land, water, old growth forests and petroleum

are being depleted. This is not a dilemma but a fact. Nor is the means of maintaining our natural resources a dilemma: the means are well known, but they are costly – e.g. the ACF – Farmer's estimate of \$30 billion to halt soil salinity. The fairest means of financing rehabilitation would be a levy on consumers, such as increased GST, which would reduce consumption and provide the means of rehabilitation. No government would impose such a levy. There is however another means of financing rehabilitation – by borrowing the money. This would impose the costs on future generations, but better debt than desert. Borrowing is the means of financing wars, and the environment can be devastated just as effectively by over exploitation as by a foreign invader.

Forecasts of future resource use may or may not be right, but present resource use and depletion is known, its costs can be calculated and the means of meeting them implemented. Nor can there be any doubt that increasing population means increasing pressure on natural resources, including our precious natural areas. Future population is not a dilemma but a matter of choice, since population can be stabilised by a policy of net zero immigration.

Malcolm Fraser and the Business Council of Australia want a future population of 50 millions. This would mean the population equivalent of 150 cities the size of Canberra. Water requirement, on present standards, would increase from 24 million giganlitres now to some 60 million giganlitres. Water could be supplied in sufficient quantity according to the Future Dilemmas report (This assumes that people will want to live and work in northern Australia, one of the world's hottest places). But the most critical issue is described as irrigation salinity, river salinity, depletion of inland fisheries, maintenance of economic and social viability in regional areas, heavy metal and pesticide contamination, and beauty and amenity of our urban areas. There will not be a shortage of food, though export will be reduced. Oil and natural gas production is near its peak and growth in production is likely to be near zero by 2050. This could have been countered by retention of the North-West shelf gas, but it will be sold to China. Those living in the crowded coastal cities would have enough to eat if sufficient resources were devoted to soil rehabilitation. They would have to do with very little water and pay a lot for petrol, but at least they could enjoy themselves in the national parks. ■

Only Habitat Preservation Will Save Endangered Species

People like to think zoos are saving species because it's such a huge problem, and it's depressing... But a lot of zoos will say "Don't worry. We're going to save the endangered wildlife for you."

David Hancocks, author of *A Different Nature: A Paradoxical World of Zoos and Their Uncertain Future*, quoted by Margie Borschke in

'Spectrum' (SMH) 30th November, 2002. Margie Borschke comments:

"More of a particular species in captivity does nothing to save a wild population and the ecosystem of which it is a part. And reintroduction (a task at which Australians are particularly naive) only works if there is a wild place to return to."

Resorting to Abuse and Malpractice

by Fiona McCrossin

THE Kosciuszko Resorts are located in the Park's most ecologically vulnerable area – within the tiny fraction of our continent that receives snow. Many people flock to these resorts in winter seeking fun in the snow. For the rest of the year, these areas return to their dominant use – low key nature based activities such as bushwalking or car touring. Recent changes in legislation, however, may change this nature centred use toward a more people orientated planning focus.

Will new plans equal more development?

The Walker Inquiry into the Thredbo tragedy proposed major changes to the way future resort development would be conducted. Walker felt that Part 5 of the *Environment Planning and Assessment Act 1979*, mainly used for public infrastructure works, by or for state agencies, was unsuitable for controlling resort development. His view was that Part 5 did not set down formal procedures for assessment or provide a process for review or appeal. He described the existing NPWS planning of ski resort villages as having a "democratic deficit" when compared to the planning which affects communities in villages, towns and cities elsewhere in the state.

To address this anomaly, Walker recommended that resort planning should come under Parts 3 & 4 of the *EP&A Act*, with its facilities for: a Regional Environment Plan; development applications (DAs); merit appeals heard by the Land & Environment Court. In other words, Walker proposed that the planning laws that applied to communities in the rest of the State were to be applied to Kosciuszko resorts so as to improve public participation. Such a

change, however, may have been made on the erroneous assumption that this type of town planning process was going to meet the needs of a very special area of public land. Not only are resorts within a national park, they are also in areas extremely sensitive to disturbance and under enormous pressure for major development. For some time there has been pressure to expand the resorts to encompass a wider range of recreational activities over four seasons. This has not been dictated by user expectations. The NPWS recently released figures show that most Park users would rather go bushwalking and camping. The push for resort expansion and year round operation comes from the resort owners desire to increase profits and to mitigate the inevitable decrease in patronage when the snow stops falling due to global warming.

The first planning instrument produced since the Walker inquiry facilitates the achievement of the resort industry's plans for resort development and four season operation. Although the resorts remain national park land, the NPWS has limited influence on controlling individual developments.

From Democratic Deficiencies to Ministerial Fiat

Dr Refshauge's State Planning Policy now regulates resort development and is an appallingly undemocratic document. Only resort developments greater than 1,000 square metres or the clearance or disturbance of more than 1 hectare of native vegetation (with a few exceptions such as wetland and upland bogs) is required to be advertised and open to public comment. Bulldozing an area equivalent to a large quarter acre suburban block and then covering that site entirely with

a building would not need to be advertised. You could even bulldoze an area of snow gums ten times the size of that building without seeking public comment.

The traditional realm of PlanningNSW, i.e. urban planning, is driving resort development and in consequence the ski resorts could become towns. As Professor Paul Adams stated in his paper at the 1999 NCC conference (Promise, perception, problems and remedies: the Land and environment Court and Environmental Law 1979-1999) "apart from intellectual myopia, a major factor in the failure to take a holistic view of the world is institutional. Agencies and departments have been created at various times and for various reasons, but once they exist have a remarkable tenacity in clinging to life and will ferociously defend their turf."

While PlanningNSW claim to be making valiant attempts to understand the needs of planning in a national park, the publicly available documents reveal a blueprint for development on a scale unheard of in our national Park system. Even a cursory search of the current PlanningNSW publications on resort planning (www.planning.nsw.gov.au) confirms that urban planning principles are being applied to this National Park.

The only real blocks to this flood of development will be the processes of public participation provided by the new planning framework. Initially this will be in the form of submissions to the draft Kosciuszko Plan of Management and the draft Alpine Resorts Plan (both are predicted for release in mid 2003). The public is likely to be disorientated in a blizzard of complex planning processes and (if the new plan allows comment on

continued on page 6

PLANS WITHIN PLANS

A NPWS paper entitled *Recreation Planning for NSW national parks* outlines a worrying new proposal to zone all national parks for recreation and tourism development. It commences by quoting the "primary objective of management" is to "preserve and protect the unique and outstanding scenery or natural phenomena", as stated in the National Parks and Wildlife Act. The paper also states "recreational use should be nature based, present minimal or no threat to the value of the park and be ecologically sustainable". The Colong Foundation's policy that facilities, particularly accommodation, should be located outside parks, is also recommended with the regrettable caveat that such facilities may also be close to the boundary if located within them.

If the above principles are observed, there is no necessity for the paper's proposed recreation zoning system. These principles are already observed in most parks,

which do not have zoning schemes, but they are all disregarded in Kosciuszko National Park, the most heavily zoned park in the state. It appears that the recreational zoning scheme is intended to allow for park development while seeming to improve nature conservation.

The object of park creation (as admitted) is nature conservation, while allowing for the appropriate enjoyment of visitors. There is no place for damaging recreational use. The paper proposes parks be carved up and placed into five zones. Zones 1 and 2 are said to exclude damaging uses, except that the Bicentennial National Trail and cycling are permitted. Commercial activities are allowed in all zones. The Foundation is concerned that recreation activities on a commercial scale will cause much damage to the natural environment and would be illegal in declared wilderness.

Zones 3 and 4 provide access for 4WD recreation, horseriders and

cyclists, activities which damage rather than preserve scenery and natural phenomena. An examination of 4WD vehicle and horseriding magazines available at any news agent demonstrates that these activities are vehicle and horse centred sports, not the appropriate nature-based activities as claimed by the paper. Powered low altitude flight is allowable in zones 3, 4 and 5, enabling acoustic pollution of these areas by helicopter joy flights.

Wilderness will be reduced

The paper "recognise(s) the pre-eminence of declared wilderness," but this recognition comes with a reductionist reappraisal of these areas. Wilderness is located in Zones 1 and 2, and each have buffer areas and definitional constraints that would effectively redefine declared

continued on page 7

Resorting to Abuse and Malpractice

continued from 5

individual development proposals) resort development applications. When this snow storm of paper subsidies, it will be too late.

NSW Environment Groups have proposed that:

- Ski resort management requires a direct link between visitor facilities and the purpose of the park and skiing should remain the primary purpose of the resorts.
- All resort development or redevelopment shall be subject to an EIS, public comment and review processes.
- The exempt development category is inappropriate for development control within a national park.
- Services and activities not directly related to skiing, including visitor-focused resort experiences, should be prohibited by the Alpine Resorts Plan and provided off park.

- The smaller resorts must not be developed or redeveloped but should be subject to a detailed audit of their engineering integrity (including risk) and solely managed by the NPWS through the plan of management.
- The lease for the Charlotte Pass resort should not be renewed on expiry in 2015 and wheeled access should not be provided during winter (particularly if the RTA manages road access to the resort).
- Existing resorts will be subject to an ecological footprint analysis and environmental impact reduction targets so that the environmental impact of the resorts is reduced of the life of the plan of management.
- To limit the influence of leaseholders on park management and to enable adaptive management, there will be no head lease arrangements or "resource security" provisions granted for the resorts in Kosciuszko National Park.

- All resort leases shall terminate by 2030 when global warming will have moved the snow line, making the ski resorts uneconomic.
- An independent committee of environmental economists will audit the draft Alpine Resorts Plan, incorporating the principles of environmental accounting into the lease agreements, and the costs of resort infrastructure and use.
- No leases or concessions shall be made of a private or semi private residential nature.
- A regional tourism study to identify appropriate recreational and accommodation opportunities in the Snowy Mountains Region,
- A public transport vision for the park, which shall include extending the ski-tube rail system to Jindabyne and strengthening investment in bus transport to all major park destinations and camp sites by increasing park entry fees for cars. ■

PLANS WITHIN PLANS

continued from 6

wilderness. Zone 1 could be read as the 'real' wilderness, while Zone 2 could become the compromised wilderness, with management trails, cycling, the Bicentennial National Trail and apiary sites for bee keeping. In view of the destructive uses, which will be allowed in all zones, even declared wilderness would not protect the natural environment. Reallocation of declared wilderness into two zones is a retrograde step that could pave the way for further political compromises and loss of wilderness values.

According to the NPWS Annual Report of 2001-02 one third of wilderness within national parks is still not protected. For these 720,000 hectares of NPWS identified wilderness the proposed zoning scheme offers no protection from inappropriate use and development.

More 4WD vehicle and horseriding access will be provided

The paper's proposed mapping rules state that "At the commencement of the zoning process all the park estate is allocated to zone 3", which effectively ensures that as much park area as possible is automatically thrown open to 4wdrivers and horseriders. The paper also proposes recreation zones that would cater for exclusive 4WD vehicle use and provision of roads for the sole purpose of scenic driving through parks. Such access arrangements are contrary to the long standing position of the environment movement that park access should be provided through an approved plan of management that provides for public access on roads suitable for 2WD vehicle use. These roads should be short and located near the margins of the park, so that the greatest number of people can enjoy the access provided.

The report notes "The provision and maintenance of visitor facilities is probably the single greatest demand on park resources, both financial and human." It follows

that undertaking zoning not only facilitates inappropriate park road access and facility development, it will also drain resources away from important nature conservation programs.



4WD vehicles are coming to a national park near you. The NPWS program to zone all national parks for recreation starts with the assumption that all areas are open to 4WD vehicle and horseriding access.

So far, only the Myall Lakes Plan of Management has been approved under the new recreation zoning scheme. While this plan provides a wilderness equivalent zone between the Bombah Broadwater and Seal Rocks, the zoning plan also provides 15.5 kilometres of off road beach driving that will damage sensitive coastal dune systems and compromise the above zone by giving access to these adjoining sensitive areas. Alan Catford, Chair of the National Parks Association's Park Management Committee, believes that "the 4WD access lobby got what it wanted out of the plan at the expense of the natural environment".

Zoning could limit public scrutiny of park development

The proposed recreation zoning system will have a similar political effect to a local town plan where various activities are permitted in some

places and prohibited in others. Apart from organising visitor activity, recreation zoning of national parks, like developing a new town plan, will raise expectations for more development and access for high impact use.

Conservationists fear that recreation development in zones 3, 4 and 5 could also be used to avoid the legal requirement to prepare a new plan of management for so-called 'minor' changes in park use, for example, opening a management road to 4WD vehicle recreation. Or, even if a new draft plan for the development is required, the fact that a proposed 4WD access route or resort facility complies with an existing park access zone means that it is likely to be approved. In this way the zone becomes a stalking horse for park development while seeming to be an improvement in environmental management. This situation mirrors the situation in town planning where the public almost always learns about a particular development too late because the land has already been rezoned for development.

Elements in the NPWS executive may think the proposed recreational planning process can provide for increased access to 4WD users and horseriders while having the political advantages of causing less visitor conflict and building partnerships with the 'community'. These circumstances are sympathetic to the access lobby, which will enthusiastically take possession of the recreation zoning process and steer it further toward park development ends.

Park recreation zoning is set to become an anathema to nature conservation, by facilitating park development and high impact use. The NPWS should have developed a regional recreation planning process that complies with the objectives of the National Parks and Wildlife Act and located high impact recreation use outside national parks. The NPWS should plan for every park to have at its core a wilderness equivalent zone, not a 4WD and horseriding zone as currently proposed. ■

New Town Plan for the City within a World Heritage National Park

THE sprawling Blue Mountains towns and villages have always been an environmental question mark because servicing these areas has remained incomplete. Providing services to a low density residential sprawl over dissected sandstone terrain has proven to be prohibitively costly and technically difficult.

In 2001, despite considerable environmental management problems, council adopted as its motto 'the City within a World Heritage National Park' and redoubled its efforts to reverse the trend toward environmental degradation. Council has since consulted with the community on a new town plan and nearly everyone supported council's new direction toward improved environmental protection. It appears that, with World Heritage listing, the push for environmental sustainability has reached a critical mass.

Encouraged by community support, the council made limiting urban expansion the primary planning objective of the new draft plan. The principle strategy of the plan is to control population and its environmental impacts in the Blue Mountains by limiting development on the urban fringe areas and redirecting development toward core village areas.

Unfortunately, the draft plan only considers development control within the existing town boundaries and the lands outside the towns, addressed under a 1991 plan, are not examined. The earlier plan, developed in a different political climate, favours further subdivision, rather than urban consolidation. Under the 1991 plan the lot size along many Blue Mountains ridgelines contracted from one lot per 40 hectares to 8 lots per hectare, creating 2,500

potential lots in remote bushland areas. Everything else in the 1991 plan, despite its award-winning environmental bells, whistles and gongs fails to contain the damage arising from urban sprawl.

So, ironically, we have a draft plan inside the towns containing development, while outside the towns urban expansion is encouraged.

Local conservationists are ecstatic about the new plan because it limits the future population of the Blue Mountains to about 84,600 people, down from the bloated 1995 projections of between 95,000 and 105,000. The growth will now only be about a ten per cent increase on the existing population levels. The 1995 targets were totally unsustainable requiring more flats, highway upgrades and bushland clearing for residential development, as well as major raw sewage overflows into the national park every time it rained.

Under the proposed town plan, urban consolidation opportunities have been reduced by two thirds. Residential development is excluded from most steep slopes and environment protection buffers have been created around significant vegetation, streams and drainage lines. Regrettably, the draft plan proposes to permit unsewered residential development on existing lots, badly compromising the objectives of the plan.

The new bushfire legislation will have a two-edged impact upon areas with high bushfire hazard, because many areas will be subjected not only to tighter development control but also more extensive clearing of environmentally sensitive bushlands.

Council has attempted to contain the damage of post-war 'paper' subdivisions that ignored the environment by creating lots over swamps, creeks and very steep land. It has done a

good job, except for the fatal flaw of allowing unsewered development. The previous veto that the Sydney Water Corporation had over unsewered development will be largely removed under the new plan. The consequences are graphic; the 784 residences already provided with effluent pump outs illegally discharge 63 olympic swimming pools of raw sewage each year to World Heritage area. Further on site sewage disposal is also to be allowed, despite being known to pollute the environment. The sandstone soils do not hold the nutrients arising from sewage effluent that, instead, flow into streams and swamps creating massive weed outbreaks and poisoning waterways.

Something Fishy

The subdivision opportunities provided outside the existing town boundaries create a residential outline for the 'City within a World Heritage National Park' that looks a bit like a fish skeleton, with the urban sprawl across every ridge forming the fishy ribs, link to a bony spine along the Great Western Highway. Some academics like this fishbone plan, saying that it creates a sense of local community focussed around each railway station. Yet this hypothetical benefit is overwhelmed by the consequences of continued low density sprawl outside the existing town boundaries, causing the greatest bush to urban interface and so yielding the maximum environmental impact.

The urban sprawl must be stopped in order to avoid increased loss of life from future bushfires and to ensure the central Blue Mountains do not become degraded urban bushland. Already this bush-urban boundary is

continued on page 9

NEW TOWN PLAN

continued from 8

800 kilometres long and heading toward an impossible to manage condition that voluntary bush regenerators and fire fighters should not be asked to tackle.

Every block developed outside existing town boundaries is a blot against the environmental aspirations of the Blue Mountains City Council and their motto. More urban sprawl means more sewage, more roading, power lines, multilane highways, more fire roads, "control" burn offs, weeds and clearing - creating what Sir Edmund Hillary once described as a smear of "third grade suburbia".

The Blue Mountains City occupies a central position in the World Heritage area and, as a result, inappropriate development has the potential to spread its effects over a wide area. Regrettably, there are still about 7,000 properties in the City without sewer (and only 2,196 of these properties are in the backlog program for connection to the sewer).

A simple answer to the problem is for the new town plan to require all residential development to be connected to reticulated sewerage services. The current proposal to allow further unserviced residential development completely defeats the environmental and health benefits of the \$300 million waste transfer scheme. There is no point in tackling the next priority for pollution control, urban stormwater, unless unserviced urban expansion beyond the town boundaries is contained.

The new town plan for the Blue Mountains should be welcomed as a great improvement and the draft plan's main detractors will be developers losing subdivision opportunities. The draft plan's main protection strategy, the containment of urban areas within a sustainable environmental footprint, however, can only be effectively achieved if a definitive urban containment line is at last drawn around the towns. The urban sprawl outside the town boundaries, allowed by the 1991 plan, needs to be revised. Council's motto won't make tourists come to see sprawling third grade suburbia, they come to see unspoilt World Heritage. ■

MANAGEMENT PLANS for World Heritage Parks in Northern NSW

THREE high quality draft plans of management have recently been exhibited for several important national parks along the Great Divide including Washpool, Gibraltar Range, Nymboida, Oxley Wild Rivers and Werrikimbe National Parks. These parks were created between 1963, when Gibraltar Range National Park was gazetted, and 1986 when the scattered reserves in the Macleay Gorges were renamed the Oxley Wild Rivers National Park.

Despite the long history of these reserves, only the Gibraltar Range National Park has a plan of management (created in 1981). All the other parks have been managed by the NPWS for many years independent of public input through the plan of management process. During that time, however, four wilderness areas within these reserves have been partly protected through a very public process, creating a strong conservation management backbone for all these draft plans.

The draft plans do not protect the remaining identified wilderness. For example, the north western quarter of the Washpool wilderness will be cut off by a proposed horseriding track, foreclosing wilderness protection for this important area. One knock on effect of this decision is that the Dunphy Wilderness Fund Reference Committee may downgrade acquisition priorities for the remaining leasehold lands in this quarter.

Horseriding within wilderness

The Achilles heel of these draft plans is the Bicentennial National Trail (BNT) that compromises wilderness management in key parks areas, particularly in the Oxley Wild Rivers National Park where the BNT traverses 30 kilometres of the Kunderang Brook, separating the Macleay Gorges wilderness from the Kunderang wilderness.

Providing a horseriding easement through wilderness makes nonsense of park management, and the NPWS should relocate this trail. Where it passes through the declared Wash-

pool Wilderness the BNT is illegal. The NPWS claim that the trail is an existing use is incorrect because recreational horseriding is not a legal right and cannot be defended as an existing use. Further evidence is being accumulated by the Foundation that passage of horseriding trails through Central Eastern Rainforest Reserves World Heritage areas is also illegal.

Investigations by the National Parks Association's Heather Roy have revealed horse camps have very serious environmental impacts (e.g. in the Kosciuszko National Park), yet these north coast draft plans allow for up to 20 horses to camp in a group along the BNT. Environmental impacts are further concentrated by a string of huts which focus horse camps around old stockyards. As is so often the case, dirt floored tin huts become pawns in a debate over high impact access, and the heritage significance of these huts can be greatly exaggerated in a bid to secure future use. In this way the wilderness is lost through a subsidiary debate over tin huts. The amusing twist to this debate is that tin huts are fairly unpleasant accommodation located in wonderful places.

It is also difficult to equitably reconcile large destructive riding groups with the park regulations governing bushwalkers using the same wilderness areas. It is ludicrous that bushwalking parties are limited to 8 persons so as to minimise impact, while on the other side of Kunderang Brook a party of 20 horses would wreck the same area by eroding soils, spreading weeds and dieback. Rather than destructively upping the ante by allowing 200 walkers to camp together in the wilderness, the horseriders should be relocated.

Also of great concern is the spread of dieback in the Werrikimbe and small parts of the Oxley Wild Rivers National Park, associated with warm temperate rainforest. The NPWS should protect the park from serious, perhaps irreversible, damage by limiting access in any areas suspected of dieback infection. ■

***THE BELLS'* (pie in the sky) SUPERHIGHWAY**

SO far, \$ 460 million has been spent upgrading the Great Western Highway but, until these upgrades link up, the net result is a speed limit change every 3 kilometres. The frustration of Blue Mountains motorists is palpable and adds fuel to the age-old rural complaint that the 'Sandstone curtain' is holding back growth in the Central West.

Road lobby groups headed by National Party stalwart, Ian Armstrong, MP and the Central Western Regional Organisation of Council think they have the answer – a superhighway to the west along Bells Line of Road. These groups have secured bipartisan State-Federal government funding for a \$2 million "full feasibility study" of the superhighway that would cost \$1.7 billion, with links to the M2 and a

bypass over Newnes Plateau.

Maunsell McIntyre previously reviewed this proposal for the Roads and Traffic Authority in 2000 and found that "options involving significant investment will not show an economic return, even under the most favourable growth scenario envisaged". According to this report the Benefit Cost Ratio of a 4 lane high standard freeway proposal is from "0.06 to 0.34 over the full range of potential traffic growth scenarios" (the 0.34 ratio is for a growth scenario that factors in the Newnes Airport). The accepted threshold needed for a major construction project to proceed is a BCR of 2.0 or more.

The superhighway proposal would require compulsory acquisition of World Heritage listed National Park within the Grose and Wollemi wilderness areas. The project would

damage tourism opportunities, cultural heritage, endangered shale communities, probably Lithgow's drinking water supply and proposed additions to the Gardens of Stone National Park.

The reality is that the central west has no demonstrated long term potential for economic or population growth that could justify the very high economic and environmental costs of establishing a second primary route across the mountains. In short, the freeway proposal is an economic and environmental dog.

The economic and environmental facts aside, the most expensive Bells line option would, at most, increase average traffic speeds to 100 km/h. For the 76 km of the existing road, the increase could only reduce the

continued on page 11

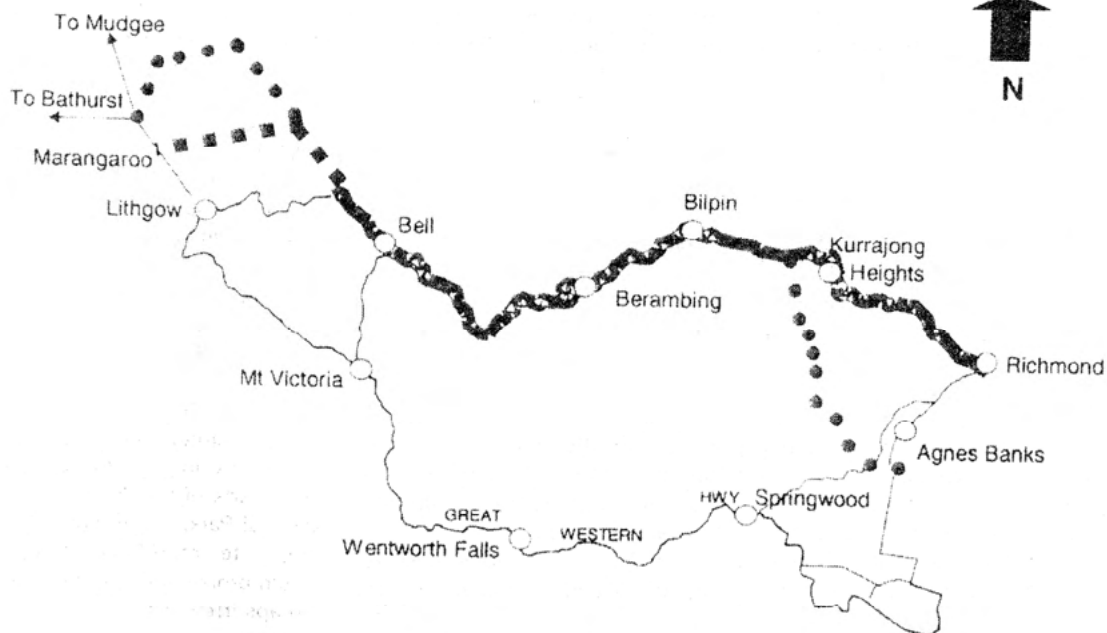


Diagram of Options

THE BELLS' SUPERHIGHWAY

continued from 10

trip time from 1 hour and 5 minutes to 45 minutes, saving just 20 minutes.

Given its origins, the \$2 million dollar road report is likely to be much more favorable than the Maunsell report. So it cannot be assumed that, just because long term traffic demand justifies only one primary route across the Mountains, another more damaging road won't be built. The price of buying votes in marginal seats, such as the Blue Mountains and Bathurst, is growing all the time and politicians love costly monuments to motor transport.

The bottom line demand for the road fanatics is a route for the larger 25 metre long B-double trucks across the mountains. Assuming the superhighway is impossible, the B-double truck route can be achieved in two ways:

□ A \$489 million upgrade of the Darling Causeway from Mount Victoria to Bell and a by-pass smashing over Newnes Plateau from Bell to Marangaroo, west of Lithgow. This would enable the larger B-doubles to avoid the River Lett Hill and Victoria Pass but provides little economic/time saving benefit to the existing Great Western Highway; or

□ Improve the Great Western Highway at Victoria Pass and the River Lett Hill at a cost of between \$80 and \$140 million, which is the least environmental and economic cost solution, and a logical extension of the current highway upgrade program.

Both options would bring large B-doubles through the Mountain townships. For another \$50 million minor passing lanes on the Bells Line of Road could augment the Great Western Highway but the route would still be unsuitable for B-doubles.

The case against upgrading the Bell Road for B-double trucks is further strengthened by the fact that most freight traffic passing through the Mountains originates in the southern and western suburbs and for this freight a new road offers little benefit unless the upgrade is linked with the M4 Motorway. Even with a

link, the time and fuel costs incurred in driving to the connection point erodes any benefit gained from a theoretical Bells Line of Road upgrade.

The proposal to upgrade the Bells Line of Road mainly benefits traffic originating from the northern suburbs of Sydney and this benefit can only be fully realised if, and when, a freeway extends to Richmond. Freight traffic from the central west to central and north coast NSW need not use the proposed road, as it may travel via the Hunter Valley or be sent by rail.

A Bell Road upgrade would be for urban expansion

The vast majority of traffic using both the Bell Road and the Great Western Highway is local, not through, traffic. As far more people live in the Blackheath to Glenbrook corridor than from Lithgow to Richmond, investment in better roads should serve the existing community.

A major Bell Line of Road would only be viable with massive urban expansion of the Kurrajong to Berambing area. The Bells superhighway is unlikely to encourage better transport but would facilitate urban sprawl over Bellbird Ridge into Billpin, compromising the World Heritage property. The Great Western Highway upgrade has been associated with a substantial hike in property prices in the Blue Mountains and such a response would be replicated if a second primary access route was constructed across the mountains via Bell. Of course if a road was constructed, property developers, who would be the main beneficiaries, would not pay a cent. ■

DONATIONS

The Colong Foundation gratefully acknowledges donation from the following during the six months ended December 31st last year: J. Alexander, M.P. V. Atkinson, Mr. and Mrs C. Austin, G. Borschmann, D. J. Bowskil', M. Bradburn, The Budawang Committee, The Bush Club, E.P. Chapman Wade, A. Cox & A.P. Walsh, G. Giles, R. Hume, Dr. G.W. Lawrence, A. Lenning, Dr M. Leizen, A. Lo, A. Maitland, P. Prineas, The Sydney Bush Walkers, J.F. Whitehouse, A. Zelnik.

The Alpine Cities

In their report on Tourism and Recreation Values of Kosciuszko National Park, Graham Worboys and Dr Catherine Pickering state that urbanised facilities are in conflict with the most important tourism and recreational value of Kosciuszko National Park. This does not accord with the Perisher Range Resort Plan published in November last year. The plan approved 1320 additional beds and 4857 car parking spaces, together with utilities for shopping, recreation and entertainment. Similar development, described in *Personal Investment* as "frenetic," is taking place at Falls Creek and Mount Hotham in the Victorian Alps. These developments put paid to the Victorian National Parks Association *Australian Alps World Heritage Nomination Proposal* launched by the Victorian Conservation Minister, the Hon. Joan Kirner, in September 1988 (see Geoff Mosley's book *The Battle for the Bush*). Warboys and Pickering are against "urban style tourism and recreational facilities such as accommodation, tennis courts, swimming pools and theme parks," but no doubt development interests will lobby for such facilities as the skiing season contracts due to global warming.

Writers Against Old Growth Logging

A number of writers and artists have withdrawn their entries for the \$40,000 Tasmanian Pacific Fiction Prize as a protest against sponsorship of the prize by the state timber agency Forestry Tasmania. Tim Winton has withdrawn his Booker prize short listed novel *Dirt Music*. Richard Flanagan author of *Gould's Book of Fish* and Daniel Wood, winner of this years Vogel award, have also withdrawn.

Myall Lakes

PLAN OF MANAGEMENT

by Jim Somerville

AS the 10,000 ha of lakes are wholly within the National Park, which is only an hours drive from Newcastle, it is natural that the recreational opportunities rely on boats and vehicles. The new Plan of Management (November 2002) seeks to satisfy the demand by the provision of 450 camp sites in 22 separate areas and the institution of a boating system. Following the fatal accident on December 2000 due to the falling limb of a paperbark, the number of picnic and camp sites has been reduced for safety reasons but we are not told the extent of the reduction, so it is not possible to assess whether the Service has been ultra conservative in endeavouring to limit its legal liability.

The Colong Foundation and the National Parks Association are both strongly opposed to the inappropriate use of off-road vehicles so it is very disappointing that they are to be permitted on almost half of the Parks beaches. The Plan clearly states that on conservation grounds access to public beaches by 4 wheel drive vehicles and trail bikes should not be allowed but then acknowledges that it is such a popular activity that it should be permitted to a limited extent. Stripping Royal National Park of wildflowers was very popular pre-WWII but it was stopped, so where is the logic in this policy weakness?

At long last the road constructed by the sand miners linking Mungo Brush road with Seal Rocks Road is



Myall Lakes National Park – a 44,000 ha coastal wonderland

finally closed to the general public. This should limit the intrusion of off road vehicles to the sensitive northern section of the Park.

A genuine praise-worthy attempt has been made to prevent boat users impacting adversely on the quality of experience enjoyed by other visitors and on the natural values of the Park. In conjunction with the Waterways Authority of NSW, a boating code of conduct has been developed which seeks to separate paddle and motorised watercraft by imposing 'no go' areas on the latter.

Unfortunately anti-social hooners are alive and well in our community, so all these highly desirable regulations and limitations are meaningless unless they are enforced by adequate ranger patrols. Regrettably past experience does not inspire confidence on this regard.

Overall, this Plan designed to manage one of the most popular coastal parks is a credible effort despite the compromises. It may be seen on the NPWS website at www.npws.nsw.gov.au ■

FUTUREScape CONFERENCE

The Nature Conservation Council is organising a conference on April 29th and 30th to "explore the interaction between the environment, economy and society". Its aim is to "draw upon expertise and opinion from a variety of fields and perspectives with the aim of facilitating vigorous debate about the future management and repair of our natural resources." Topics will include: Access vs property rights, Native Title vs indigenous relationships with the catchment, and economic tools and trade vs dangerous con job. Expressions of interest will be welcome. They should include the organisation represented and phone number and be sent to the Conference Coordinator, Clare Smith, at the NCC, Level 5, 362 Kent St., Sydney 2000. Phone 9279 2499 or email csmith@nccnsw.org.au

Protecting Kosciuszko's Ecology

Kosciuszko's ecology is subject to both human and feral damage. People should not be denied the pleasure of skiing and walking but they could do so without staying in a snow city. In addition the sheer number of visitors has created a waste disposal problem. Each year more than 70,000 people walk in the Alpine area and some 30,000 walk to the summit. The NPWS describes the situation at Seaman's Hut as follows

"Overnight and day users leave a halo of human waste around the Hut. Faeces and toilet paper buried in snow around the Hut during winter are left on the ground after snow melt." Toilet blocks are therefore a necessity, placed where they will have the least scenic impact. Composting doesn't work, therefore the alternative is pump out.

Heading the list of feral animals are wild dogs (which of course include dingoes). Baiting is the only method of control. Some 75% of foxes are believed to have been eliminated (probably an equal proportion of dingoes also). In December 2001, 135 goats were shot and in winter and autumn 90 pigs were shot. Only thirteen of the 3000 horses in the park were trapped and removed. The acreage of weeds "treated" was 1065 hectares.

A reference group of 20 made up of "key stakeholder" groups was established. Conservationists are a small minority of the group and the list of seven primary issues is headed by "access." The protection of natural values is only one of the primary issues of the group. There is adequate access to the park by many roads and ski tube and so the term "access" no doubt means off road access for 4WD drivers and horse riders.

SUPPORT THE COLONG FOUNDATION!

To: The Treasurer, Colong Foundation for Wilderness Ltd.
Level 2, 362 Kent Street, Sydney NSW 2000

The enclosed remittance or advice covers the item(s) indicated by a tick. (One cheque is sufficient to cover subscription and donation.)

- ☐ Membership application (\$25) to 31 December 2002
(NB Membership application covers Bulletin subscription)
- ☐ Colong Bulletin Subscription (\$11) to 31 December 2002
- ☐ Membership renewal to 31 December 2002 (\$25) ☐ Life Membership (\$550)
- ☐ Tax deductible donation of \$_____ to the Colong Wilderness Fund (cheques to be made payable to the Fund)
- ☐ PLUS \$_____ being for publications as indicated on the reverse side of this form.

NAME (Mr, Ms, Mrs, Miss)

ADDRESS

.....P/CODEDATE

SIGNEDAMOUNT

Payment by credit card. Mastercard ☐ Visa ☐ Bankcard ☐ Expiry date ____ / ____

Card # _____ / _____ / _____ / _____

MEMBERSHIP APPLICATION Why not join or invite a friend to join?

- ☐ Yes, I wish to become a member of the Colong Foundation for Wilderness Ltd. I subscribe to the Foundation's aim of preserving Australia's wilderness remnants. I accept the liability provided in the Colong Foundation's Articles of Association to guarantee \$20 should it be needed in the event of the winding up of the Foundation. Signed

A BEQUEST

**Please remember us
in your Will.**

The Law Society of NSW recommends the following wording... "I bequeath the sum of \$... to the Colong Foundation for Wilderness Ltd. for its general purposes and declare that the receipt of the treasurer for the time being of the Colong Foundation for Wilderness Ltd.

shall be complete discharge to my executors in respect of any sum paid to the Colong Foundation for Wilderness Ltd."



PROGRESS OF THE FOUNDATION

The Colong Foundation is the longest-serving community advocate for wilderness in Australia. It has initiated or been part of Campaigns that have secured over a million hectares of national parkland, most of which is wilderness. But a further million hectares of wilderness in eastern NSW is still not reserved under the Wilderness Act, although much of the area is now in national parks.

Now more than ever the Colong Foundation needs your support. Well financed anti-conservation lobbies, representing resource development, 4WD enthusiasts, equestrian and commercial tourism interests, have greatly increased development pressures on wild places.

The Foundation originated as the Colong Committee which was appointed in 1968 by a meeting of conservation societies to prevent quarrying of Colong Caves. Shortly afterwards the committee extended its objective to cover the saving of the Boyd Plateau from becoming the site of a 15,000 acre pine plantation. Both objectives had been achieved by 1975 when three new objectives were adopted. The first of these was the creation of a Border Ranges National Park, an objective which escalated to become the rainforest campaign. The other objectives were the creation of a Greater Blue Mountains National Park and a Kakadu National Park. The rainforest parts and Kakadu are now World Heritage Areas. The Greater Blue Mountains Park is in being in fact, though not in name. Campaigns for the Gardens of Stone and Nattai National Park have been successful. The Foundation's proposal for a Wilderness Act was accepted in 1987. It has been supplemented by the Red Index of Wilderness now being up-dated and extended to other states. It has successfully campaigned for the listing of the Blue Mountains as World Heritage.

It is at present working for the protection of threatened wilderness in NSW; the preservation of national parks from commercial development and damaging use; and the preservation of old growth forests.

THE COLONG FOUNDATION

SENDER: THE COLONG FOUNDATION FOR WILDERNESS
Level 2, 362 Kent Street, Sydney NSW 2000



PUBLICATIONS AVAILABLE FROM THE COLONG FOUNDATION

WILD PLACES

The meticulously researched, beautifully written book on wilderness by Peter Prineas with photographs by Henry Gold (285pp)

Price Posted
27.50 ☐

BLUE MOUNTAINS FOR WORLD HERITAGE

Geoff Mosley provides a comprehensive explanation of the wealth of heritage values in the Blue Mountains (135pp)

17.60 ☐

HOW THE RAINFOREST WAS SAVED

(59pp) 9.00 ☐

PARK OR PINES – The Battle for the Boyd

(42pp) 9.00 ☐

THE BATTLE FOR THE BUSH

Geoff Mosley's account of the genesis of the nature conservation movement and saving of the Blue Mountains environment. (174pp)

27.50 ☐

MYLES DUNPHY (SELECTED WRITINGS)

43.95 ☐

THE BAREFOOT BUSHWALKER

27.50 ☐

by Dorothy Butler, Australian Geographic award winner. A story of a lifetime of adventure in wilderness and high mountains (292pp)

CLASSIC BUSHWALKING MAPS

by Myles Dunphy

(Gangerang and Kowmung Maps) 6.00ea ☐

WILDERNESS RED INDEX – complete

\$110 ☐

The Index describes the land ownership, values, history and threats to NSW wild places

– Summary brochures \$2.20 ☐

– Listing of individual areas \$5.50 ☐

THE COLONG STORY

(42pp)

9.00 ☐

LIVING WITH THE DINGO

(107pp)

19.00 ☐

by Adam O'Neill