



Our Yarra: Healthy, Protected and Loved

25 October 2020

To: Whom it may concern,

The Yarra Riverkeeper opposes the development by Development Victoria of Knox Lake.

1. The lake in its current form is a highly appreciated community asset that is well used by the residents of Knox.
2. Residents appreciate the lake for its current ecological values.
3. With the current COVID-19 and Australia's closed border response, the demand for housing will decline as there will be a migration deficit of 72,000 people in 2020-21 and 22,000 people in 2021-This is in contrast to the very positive migration figures in previous years.
4. The rezoning to a Comprehensive Development Zone (CDZ) is now inappropriate, and the land should be rezoned as Public Park and Recreation Zone (PPRZ) as there is a lack of open space in Greater Metropolitan Melbourne.
5. Replacing the existing wetland with a new wetland will not be replacing like with like. In ecological terms, you cannot replace old with new and expect it will deliver a better environmental outcome. A wetland is not a house. The new wetlands will be a depauperated system. They will take many years for any sort of complexity to develop in sediments, in macroinvertebrates and therefore in other species that are resident or visit.
6. Recent artificial ecosystems lack the ecological integrity of ecosystems that have been allowed to establish over time.
7. Wetlands mature over time, developing an increasing variety of ecosystems and an expanding number of species both visible and at a scale smaller than people are typically aware.
8. The valuing of time - the time to develop a maturity in the complexity of a wetland - is of the essence in the consideration of the decision to preserve this wetland.
9. The disturbance of construction may drive away the blue-billed duck permanently.
10. Any replacement ecosystem will be more vulnerable to climate change as it will be less resilient. A replacement wetland will also be susceptible to weed invasion, which the lake is not.
11. As a wetland with 60 years of development, it is rare among the wetland ecosystems of the Greater Metropolitan Area as many that now exist are of recent construction, with most of the naturally existing ecosystems having been filled in for housing subdivision.
12. It is not accurate to say that a new wetland will 'result in a better overall environmental outcome'.

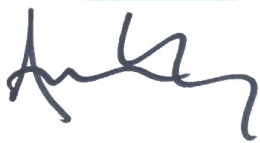
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13. There are other readily available solutions to provide settling, sediment and retention ponds to treat existing stormwater, mitigate flooding and protect Blind Creek. The expansion of the impermeable surfaces in a new subdivision will increase stormwater issues, including flooding.
14. The Engeny report 'Dam Condition Assessment Report' provides some clear and straightforward remedial works to protect the dam structure, which would enable it to be preserved and that would deliver better outcomes than the proposed development.
15. The report 'Review of proposal to drain Lake Knox & replace it with constructed stormwater lake/wetland' by Mr Paul Boon highlights missing information and inconsistencies in the materials provided by Development Victoria to justify the destruction of Knox Lake. The presentation of the materials by Development Victoria suggests an advocacy for development rather than unbiased assessment and a desire for an ecological improvement.
16. The Parliament of Victoria acknowledges the decline of environmental infrastructure, such as Knox Lake, by holding a current inquiry into that decline.
17. Mr Graeme Samuel, in the recently released interim report for the review of the EPBC Act, says: 'Australia's natural environment and iconic places are in an overall state of decline and are under increasing threat.' The proposed Knox Lake development is just the sort of project that is contributing to the decline.
18. 'Protecting Victoria's Environment' states (p. 11): 'Biodiversity is not accounted for and managed across the economy. Many businesses ... fail – or demonstrate limited ability – to account for the full environmental cost of their decisions.' Knox Lake is an example of the full environmental cost not being accounted for. In this case by Development Victoria in its proposal for the lake.
19. Minister d'Ambrosio makes the clear and simple statement in the government's report on biodiversity 'Protecting Victoria's Environment - Biodiversity 2037' that 'Victoria's biodiversity is in decline.' This sort of project, if it goes ahead, will contribute to that decline.

Yours sincerely



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