



Submission on the proposed Moreton Motorsport Park, 8 Bloesch Road, Beachmere

Submitted to: Qld Dept of State Development, Infrastructure and Planning

Consultation: Moreton Motorsport Park

Submitted by: The Moreton Bay Foundation (TMBF)

Date: 11/6/2026

To whom it may concern,

The Moreton Bay Foundation (TMBF) welcomes the opportunity to provide comment on the proposed Moreton Motorsport Park at 8 Bloesch Road, Beachmere.

TMBF does not seek to comment on the broader demand for motorsport facilities in South East Queensland. Our submission is focused on whether the proposal has adequately assessed and managed potential impacts on Moreton Bay's coastal wetlands, waterways, fish habitat, potential downstream impacts on Ramsar values, marine plants, migratory species and water quality.

As an independent, evidence-led environmental charity, TMBF is dedicated to protecting and restoring the environmental, cultural, social and economic values of Moreton Bay. Our organisation is guided by our academic members - Griffith University, University of the Sunshine Coast, University of Queensland and QUT - and collaborates with marine scientists, coastal engineers, environmental policy experts, government agencies and First Nations organisations to support evidence-based management and long-term stewardship of the Bay.

This submission is informed by the evidence base and strategic framework within the *Blueprint for a Sustainable Moreton Bay for People and Nature (2025–2035)*¹ (the Blueprint), its accompanying *Technical Appendix*² and the accumulated expertise of our academic membership. References to issues identified reflect a comprehensive body of scientific consensus regarding the cumulative pressures facing the Bay.

¹ EcoFutures (2024). A Blueprint for a Sustainable Moreton Bay 2025-2035, report prepared by EcoFutures Consulting Pty Ltd for The Moreton Bay Foundation, Brisbane, Australia.

² EcoFutures 2024. Technical appendix. Blueprint for a sustainable Moreton Bay for people and nature (2025-2035). Prepared for The Moreton Bay Foundation. Brisbane, Qld.

The project site is ecologically and hydrologically connected to Moreton Bay. The ecological assessment identifies remnant vegetation associated with wetland and riparian corridors along King Johns Creek, and tidal and wetland communities in the south-eastern portion of the site, including mangrove, saltmarsh and swamp systems. It also confirms the presence of Matters of State Environmental Significance, including marine plants, High Ecological Significance wetlands, waterways for fish passage and fish habitat areas.

The relevance of this site to Moreton Bay is reinforced by the Blueprint, which defines Moreton Bay as the whole Moreton Bay Marine Park area, including Pumicestone Passage, Southern Moreton Bay and the Broadwater, and recognises the Caboolture catchment as one of the major river systems discharging into the western side of the Bay. The proposal is therefore not only a local land-use matter; it is located within a coastal catchment that contributes to the ecological condition of the broader Bay.

For this reason, TMBF considers that the proposal requires stronger, more specific and enforceable safeguards before any approval is granted.

Key concerns

1. Stormwater, sediment and contaminants

The proposal should not be assessed as a conventional sporting facility or rural land use. A motorsport facility has a distinctive contaminant profile, including hydrocarbons, tyre and brake particulates, heavy metals, fuels, oils, litter and other event-related pollutants.

The ecological assessment states that stormwater runoff from pit areas and carparks will sheet into vegetated drainage swales before discharge into adjoining grassed areas, which will function as biobasins before discharge into King Johns Creek and associated wetlands. It also states that no significant stormwater impacts are expected if appropriate mitigation measures are applied.

TMBF considers this treatment insufficiently specific. The proposed water-quality parameters listed in the ecological assessment - total suspended solids, turbidity and pH - do not adequately address the likely contaminant risks of a motorsport facility.

Recommendation 1: Require a site-specific Stormwater and Contaminant Management Plan, independently reviewed by a suitably qualified aquatic ecologist and water-quality specialist, addressing construction and operational impacts. The plan should include, at minimum:

- sediment and turbidity;
- hydrocarbons, fuels and oils;
- tyre and brake particulates;
- heavy metals;
- nutrients and litter from major events;

- flood mobilisation of contaminants;
- water-quality risks during both routine operation and extreme rainfall/flood events.

The plan should include baseline monitoring, event-based monitoring during rainfall and flood periods, clear trigger values, publicly reportable results, and enforceable stop-work or rectification responses if thresholds are exceeded.

2. Flood-event mobilisation of pollutants

The proposal is located on a low-lying site associated with waterways and wetland areas. The ecological assessment describes the property as a low-lying 407-hectare site, fringed by waterways and wetlands, with King Johns Creek passing into the south-eastern parts of the site and becoming tidal.

This floodplain setting means that any pollutant management system must be designed not only for everyday runoff, but also for high-flow and flood conditions. TMBF is concerned that swales, basins, dams and containment systems may be overtopped or bypassed during intense rainfall or flood events, potentially mobilising sediment, hydrocarbons, tyre particles, metals and other contaminants into King Johns Creek and downstream wetlands.

Recommendation 2: Require the proponent to demonstrate how stormwater, sediment and contaminants will be contained and treated during flood and extreme rainfall conditions, including modelling of likely pollutant pathways if treatment systems are overtopped.

3. Marine plants and cumulative habitat loss

The ecological assessment confirms that the proposed entrance will require the permanent removal of **560 m² of marine plants**, including mangrove and saltmarsh species, subject to offset requirements.

While the area may be small in isolation, marine plants are protected because they perform important ecological functions, including stabilising shorelines, filtering runoff, supporting fisheries productivity and providing habitat connectivity. TMBF is concerned that the assessment places too much weight on offsetting and not enough weight on avoiding cumulative incremental loss of coastal wetland habitat.

Recommendation 3: Require the proponent to further demonstrate that all practical alternatives to marine plant removal have been exhausted. Any approved impact should be subject to a transparent offset plan that delivers like-for-like ecological benefit within the same catchment or coastal wetland system wherever possible, with long-term monitoring and public reporting.

4. Wetland hydrology and groundwater-dependent ecosystems

The ecological assessment identifies High Ecological Significance wetlands and notes that Melaleuca quinquenervia-dominated wetlands to the north of the site are groundwater-dependent ecosystems. It also notes that the conclusion of no significant residual impact depends on mitigation measures and groundwater impacts being appropriately managed.

TMBF considers this a major issue. Filling, bunding, drainage changes, swales, water storage, pumping and hardstand areas may alter wetting and drying patterns, groundwater flows and surface-water connectivity.

Recommendation 4: Require a groundwater and wetland hydrology assessment that specifically considers:

- changes to surface-water flow paths;
- changes to groundwater levels and movement;
- impacts on groundwater-dependent ecosystems;
- wetland wetting and drying patterns;
- cumulative impacts from filling, bunding, access roads, culverts, stormwater infrastructure and operational water use.

5. Acid sulfate soils and discharge-water safeguards

The acid sulfate soils report identifies substantial proposed earthworks, including **344,600 m³ of earthworks fill** and **32,000 m³ of motocross track fill**. Given the coastal and low-lying nature of the site, acid sulfate soil management is directly relevant to downstream water quality and wetland health.

Recommendation 5: Require the Acid Sulfate Soil Management Plan to be explicitly linked to downstream aquatic ecosystem protection, including discharge-water monitoring, independent auditing, contingency measures, and clear thresholds for pH, dissolved oxygen, turbidity, conductivity, iron, aluminium, suspended solids and other relevant contaminants before any water is discharged.

6. Artificial light impacts on wildlife

TMBF supports the suggestion that the National Light Pollution Guidelines for Wildlife should be applied. These guidelines provide a framework to assess and manage artificial light impacts on protected wildlife and include specific advice for marine turtles, seabirds and migratory shorebirds. ([DCCEEW](#))

The Queensland Sea Turtle Sensitive Area Model Code is also relevant as a model for reducing adverse impacts from artificial lighting on sea turtle nesting and activity, particularly by managing light spill towards the beach or ocean. ([Department of Environment QLD](#))

However, the issue should not be limited to turtles. The Moreton Bay Ramsar site is internationally significant for migratory shorebirds, and the Blueprint Technical Appendix notes that Moreton Bay supports more than 50,000 waterbirds, including approximately 35,000 migratory shorebirds in the non-breeding season, and is recognised as one of the most significant migratory shorebird sites in Australia.

Artificial light at night can disorient nocturnally migrating birds, drawing them toward lit areas and increasing exhaustion and collision risk. For wetland and shorebirds, light spill can also disrupt roosting and foraging, making otherwise suitable habitat less usable. These risks are particularly relevant in coastal wetlands, where natural darkness is part of habitat quality. In addition, night-flying birds can aggregate around artificial light and collide with illuminated objects, and that light can alter birds' habitat selection or avoidance.

Recommendation 6: Require a project-specific Artificial Light Impact Assessment and Lighting Management Plan prepared in accordance with the National Light Pollution Guidelines for Wildlife. This should assess impacts on:

- migratory shorebirds;
- wetland birds;
- marine turtles;
- bats;
- amphibians;
- nocturnal fauna;
- wetland-dependent fauna.

The plan should apply the avoid - minimise - mitigate hierarchy; prevent direct light spill into wetlands, waterways and the night sky; use shielded, low-intensity and warm-spectrum lighting where appropriate; limit event lighting hours; manage vehicle headlights and carpark lighting; and include monitoring and adaptive management.

7. Noise, vibration and wildlife disturbance

The proposal includes speedway, motocross, driver training, major events, carparking, temporary grandstands, food and beverage areas and associated event infrastructure. The MID proposal states that the facility would include speedway, motocross, driver training, event-day forecourts, carparking, loading and pitting areas, and associated infrastructure.

The proposed event matrix includes speedway events with up to 4,000 spectators per day, motocross events with up to 1,000 spectators per day, driver training and mid-week training. The proposal also indicates the site could host exceptional major events, such as an international series event or major national event.

TMBF is concerned that noise assessment appears primarily focused on human sensitive receptors, rather than ecological receptors. Wetland birds, migratory species, bats,

amphibians and other fauna may be affected by intermittent high-intensity noise, vibration, crowd activity, event traffic and lighting.

Recommendation 7: Require an ecological noise and disturbance assessment that considers construction, routine operations and major events. The assessment should include impacts on wetland-dependent fauna, migratory shorebirds, roosting and foraging birds, bats and amphibians, with clear mitigation measures and enforceable restrictions on event timing, frequency, lighting and noise where needed.

8. Cumulative impacts on Moreton Bay values

TMBF's concern is that the proposal treats impacts as individually manageable, but gives insufficient attention to cumulative impacts on Moreton Bay's coastal wetland, fish habitat and water-quality values.

The *Blueprint for a Sustainable Moreton Bay* identifies the Bay as an internationally important ecosystem supporting shorebirds, marine turtles, marine mammals, fish communities, mangroves, saltmarsh, seagrass, mudflats, coral reefs and shellfish reefs. The Blueprint also identifies pollutants from catchment runoff - including sediments, nutrients, toxicants, litter and microplastics - as among the most significant threats to Bay values.

Incremental losses of marine plants, increased contaminant loads, altered hydrology, acid sulfate soil risks and additional disturbance can contribute to broader bay-wide decline, particularly when located in low-lying coastal catchments connected to Ramsar-listed wetlands.

Recommendation 8: Require a cumulative impact assessment that considers the project's contribution to existing and future pressures on King Johns Creek, the Caboolture River, downstream wetlands and Moreton Bay, including cumulative impacts from:

- marine plant loss;
- wetland fragmentation;
- water-quality decline;
- contaminant runoff;
- acid sulfate soil disturbance;
- floodplain modification;
- light, noise and human disturbance;
- regional urban, recreational and industrial pressures.

9. Monitoring, transparency and enforceable adaptive management

TMBF is concerned that many of the assessment conclusions rely on mitigation measures being properly implemented. Where a project is proposed in a sensitive coastal wetland and floodplain setting, mitigation measures should not remain high-level or discretionary.

Recommendation 9: Require a legally enforceable Environmental Management Plan that includes:

- baseline ecological and water-quality monitoring before construction;
- construction-phase monitoring;
- operational monitoring during routine use and major events;
- event-based monitoring after rainfall and flood events;
- independent auditing;
- public reporting;
- clear trigger values;
- mandatory corrective actions;
- review and strengthening of controls if monitoring shows exceedances or emerging impacts.

Conclusion

TMBF recognises that the proponent has attempted to locate the development footprint within previously disturbed areas. However, the site is not ecologically isolated. It is a low-lying coastal floodplain site connected to King Johns Creek, tidal wetlands, fish habitat, marine plants and the broader Moreton Bay system.

Given Moreton Bay's international, national, state and local significance, TMBF recommends that the proposal should not be approved unless the proponent is required to provide much stronger, more specific and enforceable safeguards for stormwater, contaminants, flooding, groundwater, wetlands, marine plants, artificial light, noise, acid sulfate soils and cumulative impacts.

TMBF strongly recommends that any approval include clear, enforceable conditions requiring independent review, baseline monitoring, public reporting and adaptive management to ensure that the project does not contribute to the incremental degradation of Moreton Bay's coastal wetland and water-quality values.

Sincerely,



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