Technical Submission: Wellington Point Boating Facilities Upgrade Business Case

Submitted to: Maritime Safety Queensland / Department of Transport and Main Roads
Consultation: Wellington Point Boating Facilities Upgrade Business Case
Submitted by: The Moreton Bay Foundation (TMBF)
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Introduction & Organisational Standing

The Moreton Bay Foundation (TMBF) welcomes the opportunity to provide formal strategic feedback on the Wellington Point Boating Facilities Upgrade Business Case. As an independent, evidence-led, not-for-profit 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 membership (Griffith University, University of the Sunshine Coast, University of Queensland and QUT) and collaborates across an extensive network of marine scientists, coastal engineers, environmental policy experts, government agencies, and Traditional Owners to support evidence-based management and long-term stewardship of the Bay.

This submission is informed by the peer-reviewed strategic frameworks within the *Blueprint for a Sustainable Moreton Bay for People and Nature (2025–2035)*, its accompanying *Technical Appendix*, and the TMBF priority knowledge synthesis, *Sedimentation Impacts on Moreton Bay (2026)*. References to issues identified reflect a comprehensive body of scientific consensus regarding the cumulative pressures facing the Bay.

TMBF recognizes the importance of safe, efficient, and well-designed recreational boating infrastructure. Wellington Point is a critical regional node supporting maritime access, recreational fishing, tourism, and community connection. However, because this proposal sits within a highly sensitive ecological matrix inside the Moreton Bay Marine Park and directly adjacent to an internationally recognized Ramsar Wetland boundary, the strategic business case must apply a rigorous precautionary lens to infrastructure expansion. Public infrastructure investments must prioritize demand management and the strict

environmental mitigation hierarchy - ensuring impacts are avoided first, rather than managed or offset later.

Overall Position

At the Strategic Business Case stage, investment logic must demonstrate that all reasonable non-structural and low-impact alternatives have been exhausted before locking in designs that permanently degrade public assets. The currently presented suite of options creates an artificial, unacceptable trade-off between marine degradation, terrestrial degradation, and infrastructure over-engineering.

TMBF acknowledges the need to improve boating safety, vessel retrieval efficiency and accessibility at Wellington Point.

However, we hold particular and significant objections to any business case option that relies on land reclamation or physical footprint expansion into the Marine Park and associated tidal habitats. The consultation materials frame the "Leading Option" (reclaiming land within the Marine Park to create 35 trailable and 16 car spaces) as an administrative compromise designed to preserve adjacent terrestrial greenspace. TMBF fundamentally rejects this framing. It risks severely underestimating the ecological and socio-economic valuation of shallow marine and intertidal environments.

Intertidal mudflats, shallow coastal waters, and seagrass meadows are among Moreton Bay's most high-value environmental assets. They drive fisheries productivity, provide critical foraging grounds for threatened marine megafauna (dugongs and green turtles), support international migratory shorebirds, and underpin baseline coastal shoreline resilience. Converting this Marine Park footprint into vehicle parking violates the basic tenets of environmental stewardship, including through the reduction of size and quality of the Moreton Bay Marine Park.

Available consultation materials have not demonstrated consideration for the following:

- habitat loss and fragmentation;
- impacts on tidal and intertidal ecological processes;
- impacts on water quality and sediment movement;
- disturbance to wildlife;
- climate resilience and future coastal inundation;

- impacts to landscape amenity and community connection to place

and the *cumulative* and *facilitated* impacts of the above, at scale across the entirety of Moreton Bay.

Key Concerns with Current Business Case Options

1. Failure to Apply the Statutory Mitigation Hierarchy

In accordance with State and Federal environmental planning principles, marine habitat reclamation or major coastal modification should only be considered when there is a clearly demonstrated, overriding public need and where no feasible lower-impact alternatives exist. The business case fails to demonstrate strict adherence to the statutory Mitigation Hierarchy (Avoid, Minimize, Mitigate, Offset). It skips the mandatory "Avoidance" stage by failing to thoroughly evaluate non-structural demand management before proposing physical footprint expansions.

2. Neglect of Federal Legislative Triggers (EPBC Act & MNES)

Wellington Point sits immediately adjacent to the internationally recognized Moreton Bay Ramsar Wetland boundary and supports migratory shorebirds protected under international treaties (JAMBA, CAMBA, ROKAMBA). The construction noise, artificial lighting, modified hydrodynamics, and habitat fragmentation inherent in the proposed options represent a highly probable **"Controlled Action"** under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The business case is deficient as it does not explicitly factor in the significant regulatory risks, timelines, and financial liabilities associated with a mandatory federal referral for impacts on Matters of National Environmental Significance (MNES).

3. Inattention to Localized Hydrodynamics and Sedimentation

As detailed in TMBF's *Sedimentation Impacts on Moreton Bay (2026) - a priority knowledge synthesis)*, repeated small-scale coastal modifications and foreshore hardening are driving the broader, systemic ecological decline of the Bay.

- Depositional Traps: Altering localized wave energy with large breakwaters risks turning the shallow coastal zones into depositional traps for fine, catchment-derived sediments, accelerating mud accumulation and smothering benthic habitats.
- Turbidity Plumes: Earthworks, dredging, and marine construction activities across all three options will trigger acute sediment resuspension, threatening adjacent seagrass communities already operating at critical light-penetration thresholds.

4. Climate Change Vulnerability and Asset Resilience

The business case materials fail to demonstrate attention to long-term climate change asset modeling. Marine infrastructure built in highly dynamic tidal environments must be stress-tested against shifting baselines over a 50-to-100-year horizon. Capital expenditure allocated to expanding low-lying marine or foreshore infrastructure represents a highly vulnerable long-term financial investment when subjected to projected sea-level rise, increasing storm surge intensity, and escalating ongoing maintenance liabilities.

5. Lack of evidence of First Nations co-design

Moreton Bay is a living cultural landscape with profound, unextinguished, and ongoing significance for First Nations peoples. The current consultation materials do not demonstrate Traditional Owner co-design, consultation or endorsement.

Conclusion

The Moreton Bay Foundation supports efforts to improve boating safety and accessibility at Wellington Point. However, these outcomes must be balanced carefully against the ecological, cultural and community values of Moreton Bay.

TMBF encourages the Queensland Government to redirect the business case to investigate and share genuine, lower-impact alternatives that improve functionality while prioritizing the absolute avoidance of ecological impacts.

Because the Bay is already under increasing pressure from intense cumulative pressure from urban encroachment, declining water quality, and climate change, MSQ and TMR must adopt a highly precautionary, future-focused approach. In a time of rapid growth in vessel use of Moreton Bay, TMBF would welcome modern, ecologically sensitive options for

improvement to accessibility, safety, and traffic management (for example, distributed demand through real-time parking tracking apps and digital signage, staging areas with shuttle access, etc).

Thank you for the opportunity to provide this submission and for consideration of the long-term health and resilience of Moreton Bay. We encourage the Queensland Government to ensure that protection of Moreton Bay's internationally significant environmental values remains central to all future planning and assessment processes associated with this proposal, and welcome ongoing engagement regarding the management and protection of Moreton Bay and its catchments.

Yours sincerely

Katie Walters
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Further reference:

- Blueprint for a Sustainable Moreton Bay for People and Nature (2025–2035)
- Technical Appendix – Blueprint for a Sustainable Moreton Bay for People and Nature (2025–2035)
- Moreton Bay Quandamooka & Catchment: Past, Present and Future
- Sedimentation Impacts on Moreton Bay – a priority knowledge synthesis (2026)