Dear

**Objection to Mid & East Antrim Borough Council Planning Application LA02/2018/1145/F – Cloghan Point Oil Terminal**

I am writing to you as my local councillor to raise my concerns about the proposal from Cloghan Point Holdings Ltd (Application Reference LA02/2018/1145/F) to create a major oil import, storage and distribution facility at Cloghan Point. I object to this proposal on numerous grounds.

**1. Impact on Climate change** **and Northern Ireland’s Carbon Budget** - in the July 2023 Climate and Sustainability Action Plan, Mid & East Antrim Borough Council made a commitment to playing a leadership role in addressing climate change. The approval of a major new hub for sea and road distribution of fossil fuels at Whitehead runs contrary to this commitment. Tackling climate change is a legislative requirement for the Northern Ireland government. The proposed facility will negatively impact on Northern Ireland’s ability to achieve Net Zero by 2050 and the required interim carbon reduction targets for 2030 and 2040 as required by the Climate Change (NI) Act 2022.

**2. No Strategic Need** - Cloghan Point was built almost fifty years ago to supply Kilroot and Ballylumford power stations with oil by pipeline. It has not been used for regular import of fossil fuels for thirty years. It has never been used for the kind of intensive fossil fuel import and distribution that is now proposed. Northern Ireland has four functioning oil terminals — three in Belfast Harbour, one at Maydown (the latter owned by the applicant). In the context of the need to reduce dependence on fossil fuels, there is no strategic need for the proposed new oil import and distribution facility at Cloghan Point. The applicant’s environmental statement acknowledges that the facility is not needed for security of supply of fossil fuels to Northern Ireland. What underpins this proposal is the ‘commercial resilience’ of the oil company behind it and its desire for a bigger share of the remaining oil market in Ireland. The financial aspirations of the applicant should not be prioritised over the needs of the environment and local residents.

3. **Impact on road traffic and environment** – Since 2011 Cloghan Point has been used to store part of the Republic of Ireland’s strategic heavy oil reserve. There are currently negligible road traffic movements associated with the use of the site. The proposal indicates that there will be an increase of 300 road vehicle movements entering and leaving the facility daily, at a rate of approximately one every three to four minutes. Most of these traffic movements will be heavy road tankers. This will increase air and noise pollution, with associated negative health and well-being impacts. Two primary schools and a secondary school are sited within metres of the carriageway that the road tankers will follow. A recent report by the [Royal College of Paediatrics & Child Health](https://www.rcpch.ac.uk/resources/impact-climate-change-global-child-health-position-statement#our-top-three-requests-for-global-leaders) called for child health to be a central theme in all climate change policy decisions.

**4. Impact on tourism** - the A2 is promoted as the gateway to the Glens and the Causeway Coast. Competing for road space with large numbers of oil tankers is unlikely to entice people to use the route unless they have to. This will undermine the investment in the Gobbins as a tourist destination and proposed tourism development at Carrickfergus. Whitehead has been a tourist destination for more than 100 years. Jobs in local tourism businesses are threatened by the proposal. It will negatively impact on the adjacent listed structure, Whiteharbour (which is specifically protected in the local area plan), compromising its setting, viability as a marina and its potential for contributing to the tourist economy.

**5. Impact on wildlife and biodiversity** – the proposed facility risks the integrity of the Belfast Lough ecosystem and adjacent ecosystems along the Antrim and north Down coasts. The council has identified ‘the degradation and loss of habitats’, including through industrial development and infrastructure projects, as the biggest threat to local bio-diversity (<https://www.midandeastantrim.gov.uk/downloads/lbap-mea-final.pdf>). The lough is home to UK red and amber list bird species such as curlews, dunlins, turnstones, eider ducks, redshanks, black guillemots and oystercatchers. Peregrine falcons nest on the cliffs close to Cloghan Point. Bats hunt nearby. Seals, dolphins, porpoises and otters are seen in the area of the development. The threat to biodiversity is multi-faceted and includes:

- severe environmental pollution from oil spills

- noise, light, odour and air pollution

- the impact of climate change.

**6. Risk of leaks, fires and explosions** – wherever fossil fuels are deposited and stored, there is a risk of leaks, fires and explosions, be they as a result of accident, human error or even sabotage and terrorism. The proposal will see a change in the nature of fossil fuels stored at the site from heavy oil to much more flammable fuels. The discharge and storage of highly flammable liquids close to nesting birds and marine life, not to mention the local human population, can never be entirely risk-free. Indeed the report to the Council’s Planning Committee in September 2023 stated that one of the reasons Belfast Harbour was dismissed by the applicant as a site for the import and distribution facility was ‘the proximity of a large population in the event of an incident.’ The consequences of a leak or explosion would be catastrophic for the local area and beyond.

The proposed development is overwhelmingly opposed by local people. Hundreds of objections were submitted to the council when the planning application was previously considered with only one letter of support. The development is opposed by local MLAs.

In conclusion, the proposal is deeply flawed and should be rejected. Please can you raise my concerns with relevant officers and members of the Planning Committee.

Yours sincerely