Dear

**Cloghan Point Oil Terminal**

I am writing to you as my MLA to ask for your help in opposing the proposed redevelopment of Cloghan Point as a major oil import, storage and distribution facility (Application Reference LA02/2018/1145/F). The redevelopment will have a significant negative impact on local people, poses a threat to the environment and biodiversity and undermines Northern Ireland’s ability to meet climate change targets.

**1. Impact on Climate Change** **and Northern Ireland’s Carbon Budget** -  tackling climate change is a legislative requirement for the Northern Ireland government. The development of a major hub for sea and road distribution of fossil fuels runs contrary to this objective. Chapter 14 of the revised Environmental Statement prepared on behalf of Cloghan Point Holdings Limited states that: “When scaling Northern Ireland’s baseline emissions (DAERA, 2024) by the targeted reduction, it can be expected that the emissions target for Northern Ireland for 2030 is 15,064,400 tCO2e, and for 2040 is 6,663,100 tCO2e. When scaling the Proposed Redevelopment’s total operational emissions for 1 year (4,199,735 tCO2e), it can be seen that they comprise approximately 28% and 63% of Northern Ireland’s target emissions in 2030 and 2040, respectively.” (Paragraph 14.6.20)

I am deeply concerned that the proposed facility will threaten Northern Ireland’s ability to achieve the required interim carbon reduction targets for 2030 and 2040 and Net Zero by 2050 as required by the Climate Change (NI) Act 2022.

**2. No Strategic Need** - 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. Significant Intensification** - Cloghan Point was built almost fifty years ago to supply Kilroot and Ballylumford power stations with oil by pipeline. Although the revised Environmental Statement refers to it as an “existing oil import and export, storage and distribution facility,” this is misleading. The site has not been used for regular import of fossil fuels for thirty years. It has never been used for export of fossil fuels other than by pipeline to the power stations. It has never been used for the kind of intensive fossil fuel import and distribution that is now proposed.

Since 2011 Cloghan Point has been used to store part of the Republic of Ireland’s strategic heavy oil reserve. There are currently no ship and negligible road traffic movements associated with the use of the site. The proposal will see 120,000 tonne supertankers offloading a variety of fuels that are more flammable and volatile than those currently stored. Smaller sea tankers will distribute these fuels to other seaports across Britain and Ireland. 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.

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 Belfast to Larne section of the route unless they have to. This will undermine the investment in the Gobbins as a tourist destination and proposed tourism development at Carrickfergus and negatively impact local tourism businesses in Whitehead and Islandmagee.

**3. 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 area 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.

**4. 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 Mid & East Antrim Borough 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.

**5. Widely opposed -** 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.

In conclusion, the proposal is deeply flawed and should not receive planning permission. In the first instance, the decision rests with Mid & East Antrim Borough Council’s Planning Committee and I would appreciate it if you could please raise my concerns with the Council. However, once the Council has made its determination, the Department for Infrastructure will have the opportunity to decide whether or not to use its power to call the decision in. Given its very significant climate and environmental implications, I would appreciate your help in encouraging the Minister for Infrastructure to use her call-in power so the proposal can be thoroughly considered within a regional and sub-regional context.

Yours sincerely