Mobuoy Road Waste Site

Review of Public Consultation Feedback – Consultation Response 19

787-B030252

V2

NIEA

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Document prepared on behalf of Tetra Tech Consulting (Northern Ireland) Limited: No. NI667243

TETRA TECH

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1.0 INTRODUCTION

1.1 INSTRUCTION

Tetra Tech Consulting NI Limited (Tetra Tech or TT) were appointed by Northern Ireland Environment Agency (NIEA), an executive Agency within the Department of Agriculture, Environment and Rural Affairs (DAERA), under the Mobuoy Road Waste Site Remediation Project to undertake a review of the Consultation Response 19 prepared by AECOM on behalf of Department for Infrastructure (DfI) of the Draft Remediation Strategy for the Mobuoy Road waste site in Co. Londonderry.

A site location plan is provided in Figure 1.

1.2 PROJECT BACKGROUND

The Mobuoy Remediation Project herein referred to as the 'site' is located on the outskirts of the city of Derry/Londonderry on the Mobuoy Road. It encompasses an area of approximately 46ha and currently consists of two distinct parcels of land either side of Mobuoy Road identified as City Industrial Waste (CIW) and Campsie Sand and Gravels (CS&G) as shown on Figure 1. The surrounding land use is agricultural, and the site is bounded to the west by the River Faughan.

The CIW site is located to the east of Mobuoy Road and covers an area of approximately 14Ha. It comprises of a former Materials Recycling Facility (MRF), closed landfill and an area of former sand and gravels extraction located approximately 100m east of the River Faughan. The CS&G site is located to the west of Mobuoy Road and adjacent to the River Faughan which was subject to extensive sand and gravel extraction over a number of years.

Historical context (Mills Report[1]) indicates a landfill was present on the site from at least 1980. CIW was granted a waste disposal licence in 1996 and by 2004 the MRF was established. A landfill Closure Notice was issued in 2007. In 2012 the NIEA Environmental Crime Unit investigated alleged illegal waste activities, and the waste management licence for the MRF was revoked in June 2013. A Departmental investigation in 2015 estimated that large volumes of illegally deposited waste remained on the site.

TT joined the Integrated Consultancy Team (ICT) for Mobuoy in 2021. Between 2021 and 2022 TT reviewed historical environmental risk assessments, carried out supplementary intrusive ground investigations, completed follow-up monitoring to improve site characterisation, and prepared an updated Detailed Quantitative Risk Assessment (DQRA, October 2022) which recommended remediation. A Remediation Options Appraisal was produced in March 2023, and a Draft Remediation Strategy was prepared in June 2023. The Draft Strategy was subject to public consultation which opened on 13th June 2025 and closed on 2nd October 2025.

[1] A review of waste disposal at the Mobuoy site and the lessons learnt for the future regulation of the waste industry in Northern Ireland, Christopher Mills, December 2013

1.3 LAND CONTAMINATION TECHNICAL FRAMEWORK

The land contamination management approach at the Mobuoy Road Waste Site Remediation Project follows the Land Contamination Risk Management (LCRM[2]) published by the Environment Agency (8th October 2020, last updated 12th June 2025). These procedures provide a structured framework for making decisions in the assessment and management of contaminated sites such as the Mobuoy waste site. LCRM uses a staged risk-based approach with 3 stages, each stage further broken down into steps.

Stage 1: Risk assessment

1. Preliminary risk assessment.
2. Generic quantitative risk assessment.
3. Detailed quantitative risk assessment.

Stage 1 establishes whether contamination poses a plausible risk to receptors and, if so, quantifies that risk. The Preliminary Risk Assessment compiles site history, conceptual site model (CSM) and identifies potential contaminant–pathway–receptor linkages. Where needed, Generic Quantitative Risk Assessment (GQRA) uses screening-level contaminant concentrations and conservative assumptions to test likely risks. If GQRA indicates potential unacceptable risk or uncertainty, a Detailed Quantitative Risk Assessment (DQRA) refines the CSM with site-specific data, targeted sampling and modelling to produce more defensible risk estimates and to inform remediation requirements.

Stage 2: Options appraisal

1. Identify feasible remediation options.
2. Do a detailed evaluation of options.
3. Select the final remediation option.

Stage 2 identifies and evaluates feasible remediation and management options to address the risks identified in Stage 1. The process begins with a longlist of technically feasible measures, narrows to a short-list through screening (technical, environmental, health & safety, deliverability), and then carries out a detailed appraisal (effectiveness, cost, sustainability, timescale, residual risk). The objective is to select a practicable, proportionate and cost-effective remediation approach that meets the risk-based remediation objectives and regulatory expectations. The Mobuoy Road Waste Site Remediation Project currently sits within Stage 2/3, whereby the Draft Remediation strategy has been produced but subject to further refinement following the public consultation.

Stage 3: Remediation and verification

1. Develop a remediation strategy.
2. Remediate.

[2] Land contamination risk management (LCRM) - GOV.UK

3. Produce a verification report.
4. Do long term monitoring and maintenance, if required.

Stage 3 delivers the selected remedial work and demonstrates that the remediation objectives have been achieved. This begins with preparation of a detailed remediation strategy and works specification (method statements, health & safety, environmental controls, waste management). During remediation, actions are implemented and monitoring/controls applied. On completion, a verification report documents the work, presents confirmation sampling and demonstrates compliance with the remediation objectives. Where appropriate, a long-term monitoring and maintenance plan is prepared to manage residual risks and ensure continued protection of receptors.

1.4 PURPOSE OF REPORT

The purpose of this document is to present Tetra Tech's review of Consultation Response 19 (submitted by AECOM, on behalf of Department for Infrastructure (DfI)) in relation to the Draft Remediation Strategy for the Mobuoy Road site. This review will:

- Summarise the key points raised in the response including technical aspects;
- Identify outcomes, implications or issues arising from those points in relation to the Draft Remediation Strategy and the LCRM process; and
- Where relevant, suggest clarifications, further actions or follow-up by the ICT, NIEA or other parties.

This review is intended to inform decision-making and next steps.

1.5 LIMITATIONS, TERMS AND CONDITIONS

Attention is drawn to the report conditions, included in Appendix A, and the terms and conditions of the engagement as detailed in our accepted proposal.

2.0 CONSULTATION RESPONSE 19

Consultation Response 19 comprised of the provision of a Technical Note following a review of the draft Remediation Strategy by AECOM, prepared on behalf of DFI. AECOM identified that DfI is considered a key stakeholder to the Mobuoy waste site given its proximity to Phase 2 of DfI's proposed A6 Londonderry to Dungiven Dualling scheme which includes the provision of a dual carriageway through the Faughan Valley and the realignment of the Mobuoy Road. The boundary of the Mobuoy waste site overlaps DfI's proposed A6 mainline at chainages 1+170 to 1+450 and 1+800 to 1+980, as shown in drawing 60513912-ACM-HGN-S10-DR-HY-00049 provided in Appendix A of AECOM's Technical Note.

The purpose of the consultation response from AECOM was to:

- Provide a clear, evidence-based technical assessment of the draft Remediation Strategy to support DfI in forming its position;
- Highlight key risks, gaps, or areas requiring clarification or improvement;
- Ensure that the concerns of DfI and their stakeholders, including technical, environmental, and community considerations, are addressed; and
- Contribute constructively to the finalisation of a robust, deliverable remedial strategy

The Technical Note comprised of an Engineering Review and Environmental Review completed by AECOM.

Further consideration of the key points raised is provided in the subsequent sections.

2.1 KEY POINTS RAISED

From AECOM's consultation response, seven key points were inferred by Tetra Tech; The key points are expanded upon below and Tetra Tech have provided their response.

Point 1: Remediation Infrastructure overlaps the DfI's A6 Boundary

AECOM indicated that several elements of the proposed remediation infrastructure are located within DfI's trimmed draft vesting boundary (as shown in 60513912-ACM-HGN-S10-DR-HY-00049). This infrastructure included leachate extraction boreholes and surface attenuation ponds. Due to this overlap, AECOM perceived potential risks to include:

- Construction interference, where overlapping works could delay or complicate programme delivery;
- Operational conflicts, particularly in maintaining access to leachate or surface water management infrastructure once the road scheme is constructed / operational; and
- Environmental impacts, such as inadvertent disruption to drainage patterns or water quality management if features are not properly coordinated.

TT Commentary

Tetra Tech notes that AECOM's comments on behalf of DfI, in relation to A6 Londonderry to Dungiven Dualling scheme and considers the abovementioned point raised will be dealt with via the ongoing collaboration and

scoping exercises. Particular considerations should be given to placement of remediation infrastructure within the draft vesting boundary.

Point 2: Mobuoy Road Overbridge

AECOM noted that there is level difference between the proposed upgraded section of the Mobuoy Road and the A6 mainline. In AECOM's response it was highlighted that the proposed levels at the Mobuoy Road overbridge are c.12m above existing ground level (EGL), whereas the A6 mainline was indicated to cut in between chainages 1+170 to 1+450, reaching 10–13 m below EGL. AECOM stated that this difference in proposed ground level would present risks relating to structural stability, drainage, floodings and construction safety to be considered within the remedial strategy.

TT Commentary

Tetra Tech notes that AECOM's comments on behalf of DfI, in relation to A6 Londonderry to Dungiven Dualling scheme and considers the abovementioned point raised will be dealt with via the ongoing collaboration and scoping exercises.

Point 3: Flooding

The response noted that the Mobuoy waste site is located within the River Faughan floodplain and therefore requires a Flood Risk Assessment (FRA) to be undertaken in accordance with Planning Policy Statement 15 (PPS15). AECOM noted that the future FRA should consider the combined impacts of both the proposed Remedial Strategy and the A6 dualling scheme to ensure flooding in the area is not exasperated.

TT Commentary

Tetra Tech notes that AECOM's comments on behalf of DfI, in relation to A6 Londonderry to Dungiven Dualling scheme and considers the abovementioned point raised will be dealt with via the ongoing collaboration and completion of a detailed flood risk assessment in accordance with PPS15.

Point 4: Permanent and Temporary drainage schemes

Consultation Response 19 indicated that proposed temporary drainage scheme designs or surface water modelling were completed for the site at the time of reporting. AECOM noted that the change in ground levels from the proposed A6 dualling scheme should also be considered within the proposed drainage infrastructure.

AECOM noted that the temporary drainage schemed should consider the sensitive habitat of the River Faughan and that effective management of the drainage and compliance with the relevant environmental legislation and guidance is required to protect the environment.

TT Commentary

Tetra Tech notes that AECOM's comments on behalf of DfI, in relation to A6 Londonderry to Dungiven Dualling scheme and considers the abovementioned point raised will be dealt with via the ongoing collaboration and scoping exercises. During detailed design stages the temporary and permanent drainage designs will be developed.

Point 5: Waste Removal Associated with A6 Works

AECOM comments that the scope of waste to be removed in order to facilitate the A6 works and the future contamination liability were undefined. AECOM notes that DfI have not verified the volume of the cut where the A6 scheme intersects with Zone 1 and 2. Also, AECOM notes that the draft Remediation Strategy should recognise that the A6 scheme overlaps the western edge of Zone 1 and Zone 3.

In addition to this, AECOM indicates that the draft Remediation Strategy document did not include the overlap between the A6 scheme, and the western boundary of the CIW Yard or the drainage outfall located at Zone 8.

TT Commentary

Tetra Tech notes that AECOM's comments on behalf of DfI, in relation to A6 Londonderry to Dungiven Dualling scheme and considers the abovementioned point raised will be dealt with via the ongoing collaboration and scoping exercises.

Point 6: Site Access and Site Masterplan

Consultation Response 19 documents that the "site vision consultation" had not been completed at the time of writing. AECOM emphasise that the long-term site vision must consider the site access, to ensure functionality with the existing Mobuoy Road and the proposed A6 scheme.

TT Commentary

Tetra Tech notes that AECOM's comments on behalf of DfI, in relation to A6 Londonderry to Dungiven Dualling scheme and considers the abovementioned point raised will be dealt with via the ongoing collaboration and scoping exercises.

Point 7: Environmental Assessment

AECOM considers that the environmental assessment completed to date is too narrow with limited species surveys, no wider Faughan Valley baseline and no side-by-side impact comparison of remedial options.

Through their review of the draft Remediation Strategy document, AECOM emphasised that the environmental setting issues were focused predominantly on ground-related environmental setting issues such as ground/waste, geology, hydrogeology and groundwater modelling. AECOM highlight that ecology surveys were limited to invasive non-native species, smooth newts, badgers and otters and were primarily undertaken in 2021/2022.

It was stated by AECOM that the draft Remediation Strategy document did not provide a detailed comparison of the respective environmental impacts (including the benefits and disbenefits) associated with the proposed remedial options. Additionally, AECOM highlighted that an overall baseline description of the wider study area was not provided.

TT Commentary

Tetra Tech notes that AECOM's comments on behalf of DfI, in relation to A6 Londonderry to Dungiven Dualling scheme and considers the abovementioned point raised will be dealt with via the ongoing collaboration and scoping exercises.

It is recognised that further ecological assessment and integration are needed, at the appropriate time. Until public consultation on the draft Remediation Strategy had been completed, agreed remediation proposals have been available to fully assess ecological impacts. It is also recognised that ecology has high potential to change over time. It is planned that further detailed ecological assessments will be scoped and completed to inform detailed design and the production of an EIA.

Additional comparison of the environmental impacts will be required as part of the Planning/EIA processes.

2.2 FURTHER ACTIONS

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned; TT will consider during any future phases of the project; These further actions will include:

- Detailed consideration of the A6 Londonderry to Dungiven Dualling scheme within future versions of the draft Remediation Strategy;
- Continued communication and collaboration between DAERA, TT and DfI between the Mobuoy Waste site remediation project and the A6 scheme;
- Further detailed flood risk assessment on site in accordance with PPS15 and how proposed remediation works will impact potential flood risks;
- Confirmation of the temporary and permanent drainage schemes with detailed designs provided; and
- Further consideration of wider environmental impacts and additional ecological audits.

FIGURE 1: SITE LOCATION PLAN

Figure 1. Site Location Plan

N

Legend

City Industrial Waste

Campsie Sand Gravel

Note:

Drawn by: [redacted]

Checked by: [redacted]

Office: Belfast Revision: No.1

Client: NIEA Project: B030252 - Mobuoy Road Remediation

0 850 1,700 3,400 Meters

Date: 30/06/2022

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APPENDIX A: REPORT CONDITIONS

REPORT CONDITIONS

This report is produced solely for the benefit of ***NIEA,*** and no liability is accepted for any reliance placed on it by any other party unless specifically agreed in writing otherwise;

This report is prepared for the proposed uses stated in the report and should not be used in a different context without reference to Tetra Tech; In time improved practices, fresh information or amended legislation may necessitate a re-assessment; Opinions and information provided in this report are on the basis of Tetra Tech using due skill and care in the preparation of the report;

This report refers, within the limitations stated, to the environment of the site in the context of the surrounding area at the time of the inspections; Environmental conditions can vary, and no warranty is given as to the possibility of changes in the environment of the site and surrounding area at differing times;

This report is limited to those aspects reported on, within the scope and limits agreed with the client under our appointment; It is necessarily restricted, and no liability is accepted for any other aspect; It is based on the information sources indicated in the report; Some of the opinions are based on unconfirmed data and information and are presented as the best obtained within the scope for this report;

Reliance has been placed on the documents and information supplied to Tetra Tech by others but no independent verification of these has been made and no warranty is given on them; No liability is accepted, or warranty given in relation to the performance, reliability, standing etc of any products, services, organisations or companies referred to in this report;

Whilst skill and care have been used, no investigative method can eliminate the possibility of obtaining partially imprecise, incomplete or not fully representative information; Any monitoring or survey work undertaken as part of the commission will have been subject to limitations, including for example timescale, seasonal and weather-related conditions;

Although care is taken to select monitoring and survey periods that are typical of the environmental conditions being measured, within the overall reporting programme constraints, measured conditions may not be fully representative of the actual conditions; Any predictive or modelling work, undertaken as part of the commission will be subject to limitations including the representativeness of data used by the model and the assumptions inherent within the approach used; Actual environmental conditions are typically more complex and variable than the investigative, predictive and modelling approaches indicate in practice, and the output of such approaches cannot be relied upon as a comprehensive or accurate indicator of future conditions;

The potential influence of our assessment and report on other aspects of any development or future planning requires evaluation by other involved parties;

The performance of environmental protection measures and of buildings and other structures in relation to acoustics, vibration, noise mitigation and other environmental issues is influenced to a large extent by the degree to which the relevant environmental considerations are incorporated into the final design and specifications and the quality of workmanship and compliance with the specifications on site during construction; Tetra Tech accepts no liability for issues with performance arising from such factors;