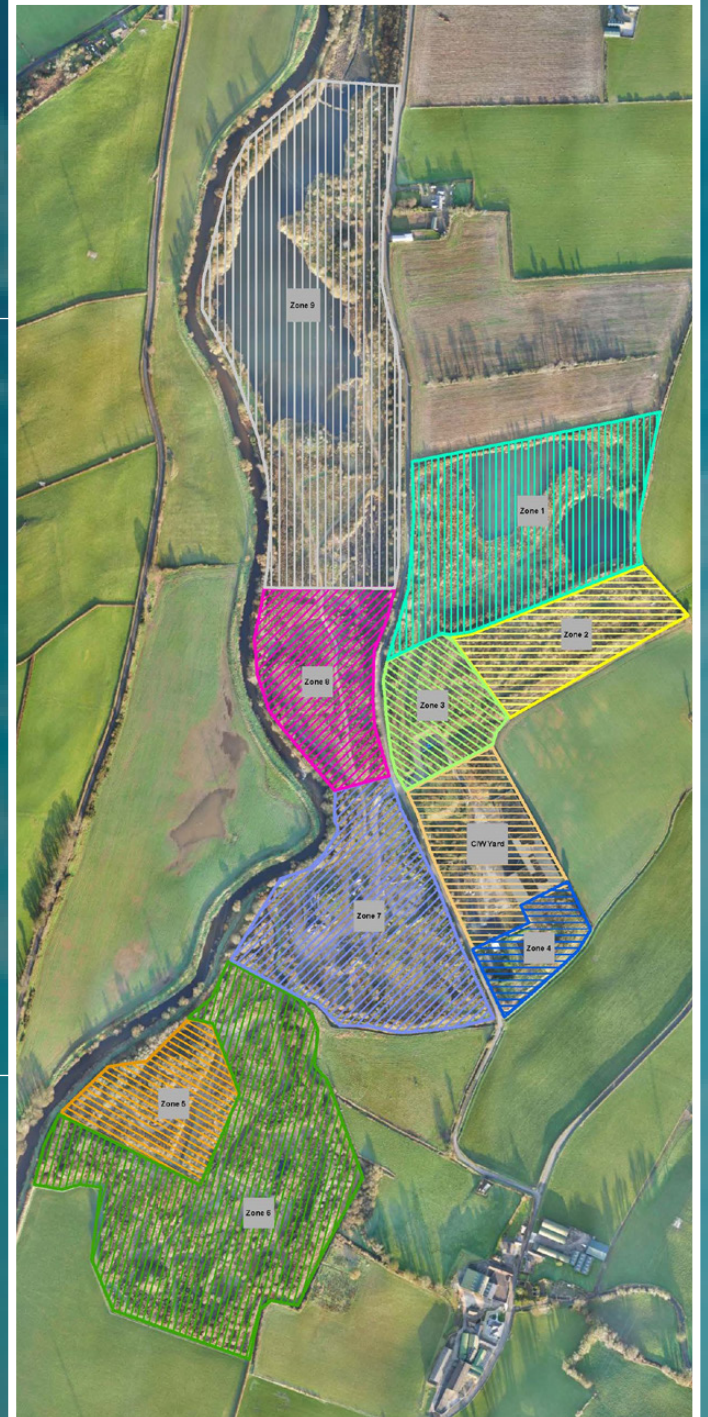


# Summary Report

## Responses to the Consultation on the draft Remediation Strategy for the Mobuoy Site



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# 1.0 Summary

## 1.1 Summary of Consultation Responses

### Summary of Responses from Individuals

In summary, the responses from **individuals** indicate:

- There is broad agreement for the need to clean up the site, but opinions are split on whether the proposed strategy is the right approach. Some disagree because they believe there are still uncertainties about the type and spread of waste and contamination requiring remediation, while others feel the suggested solutions are too costly, complicated, and not yet proven effective.
- Opinions on whether implementation of the draft Remediation Strategy will achieve the remediation strategic objectives were split: four agreed, three disagreed. Reasons for disagreement included the proposal to leaving waste near waterways, limited information on surface water management, complexity, and general concerns around effectiveness of the solutions proposed.
- All of them agree that where difficult decisions around funding need to be made to allocate resources, funding should be focused on the zones of highest environmental risk.
- The majority agree that the listed environmental strategic objectives are appropriate for, and would be expected to be seen in, the draft Remediation Strategy.
- The protection of surface water quality at the River Faughan and feed tributaries, and protection of the quality of the NI Water's raw water abstraction at Cloghole (for Carmoney Water Treatment Works (WTW)) are considered the most important environmental objectives.
- The majority agree that the strategic objective of creating long-term benefit to the site and wider community should be included in the Remediation Strategy. Comments highlighted the potential to "bring some good out of this disaster" and the importance of water quality for the wider community, noting the river's status as an Area of Special Scientific Interest (ASSI).
- The majority agree that integration with the A6 road scheme and wider public interests should be included as a strategic objective, with a comment noting this was important to reduce the risk of the road scheme causing further risk from contamination from the site.

- Additional thoughts, comments, or relevant information to inform the completion of the Remediation Strategy included -
  - The need for careful consideration of, flood risk and climate change on remediation proposals, engineering options to protect the River Faughan, sensitive ecological habitats, and the need for ongoing public engagement.
  - The opinion that NI Executive should prioritise funding and delivery of the draft Remediation Strategy, with a clear timeline and key milestones.

## Summary of Responses from Remediation / Construction Organisations

In summary, the responses from **remediation / construction organisations** indicate:

- All agree that the draft Remediation Strategy is the right way to remediate the Mobuoy site, with some organisations highlighting that further technical/design information was needed to provide a technical response.
- All agree that the draft Remediation Strategy would achieve the remediation strategic objectives.
- All agree that where difficult decisions around funding need to be made to allocate resources, funding should be focused on the zones of highest environmental risk.
- All agree that the listed environmental strategic objectives are appropriate for, and would be expected to be seen in, the draft Remediation Strategy.
- The protection of surface water quality at the River Faughan and feed tributaries, and protection of the quality of the NI Water's raw water abstraction at Cloghole (for Carmoney WTW) are considered the most important environmental objectives.
- All agree that the strategic objective of creating long-term benefit to the site and wider community should be included in the Remediation Strategy.
- The majority agree that integration with the A6 road scheme and wider public interests should be included as a strategic objective.

## Summary of Responses from Chartered / Professional Bodies

In summary, the responses from **chartered / professional bodies** indicate:

- Queen's University, Belfast (QUB) agree that the draft Remediation Strategy is the right way to remediate the Mobuoy site, noting that further technical/design information was needed to provide a technical response.
- QUB agree that the draft Remediation Strategy would achieve the remediation strategic objectives, noting that further technical/design information was needed to provide a technical response.

- QUB and Chartered Institution of Waste Management Northern Ireland (CIWM NI) both agree that where difficult decisions around funding need to be made to allocate resources, funding should be focused on the zones of highest environmental risk.
- QUB and CIWM NI responded directly to the consultation question and agree that these were the environmental strategic objectives they would expect to see in the Remediation Strategy for the Mobuoy site.
- QUB ranked reduction of landfill gas to acceptable levels to protect site users as the most important environmental objective.
- Both QUB and CIWM NI agree that the Remediation Strategy should include the objective of creating long-term benefits for the site and community, highlighting educational opportunities, co-design with stakeholders for the site's future use, the value of citizen science programmes for ongoing monitoring, transparent access to data, and the need for regular reviews to ensure land use options remain suitable for the agreed final use.
- QUB agree that they would expect to see the strategic objective allowing integration with the future A6 road scheme and wider public interests included.
- Additional thoughts, comments, or relevant information to inform the completion of the Remediation Strategy included -
  - Consideration of the proximity principal throughout the design process and use locally sourced materials and create jobs for the community.

## Summary of Responses from Conservation / Environmental Organisations

In summary, the responses from **conservation / environmental organisations** were:

- There is broad agreement for the need to clean up the site, but opinions are split on whether the proposed strategy is the right approach. One agreed, and one disagreed. Although Friends of the Earth (FOE) answered 'no' because they disagreed with the wording of the question rather than the technical proposals within the strategy.
- Ulster Wildlife (UW) agree, and FOE disagree that the draft Remediation Strategy would achieve the remediation strategic objectives. Although FOE appeared to disagree with the use of the categories "Off-Site Disposal" and "In-Situ treatment" rather than the achievability of the remediation objectives.
- UW agree, and FOE disagree that, when difficult funding decisions must be made, resources should be focused on zones of highest environmental risk. Alternatively, FOE suggested that resources should be allocated in such a way to ensure optimal return on investment for remediation expenditure.

- UW agree, and FOE disagree that the listed environmental strategic objectives are appropriate for, and would be expected to be seen in, the draft Remediation Strategy. FOE suggested they are “too vague and not necessarily likely to result in the necessary management of risk.”
- Both organisations agree that the strategic objective of creating long-term benefit to the site and wider community should be included in the Remediation Strategy. FOE highlighted that restoring the site for community use is important for healing the damage caused by past events.
- UW agree, and FOE disagree that integration with the A6 road scheme and wider public interests should be included as a strategic objective. FOE recognised that while coordination with other projects can be sensible for resource allocation and avoiding future risks, the A6 road proposal requires thorough reassessment under current environmental and legislative contexts and should not be connected to the Mobuoy Remediation Project as a strategic objective.
- Additional thoughts, comments, or relevant information from all conservation/ environmental organisations that responded to inform the completion of the Remediation Strategy included -
  - Concerns about the complexity and compatibility of the proposed remediation technologies for the Mobuoy Road site,
  - Reinforcement of the need to remediate the site to protect the environmental designation of the River Faughan and the public health of people who rely on the river, particularly for public drinking water supply,
  - Concerns around using the river as a means of diluting contaminants, potential prioritisation of the need for the A6 scheme over the need to remediate the site, and potential undiscovered waste types on the site.
  - Requests for more information on certain remediation techniques, long-term landfill gas management, and the resilience of proposals to climate change impacts, especially flood risk.

## **Summary of Responses from Government Departments / Bodies**

In summary, the responses from **government departments or bodies** indicate:

- The Loughs Agency agree that the draft Remediation Strategy is the right way to remediate the site.
- Loughs Agency agree that the draft Remediation Strategy will achieve the remediation strategic objectives. The response from DfI Roads indicated the objectives were achievable, but through continued engagement and collaboration between the Department of Agriculture, Environment and Rural Affairs (DAERA) and DfI Roads.

- Loughs Agency agree that where difficult decisions around funding need to be made to allocate resources, funding should be focused on the zones of highest environmental risk. DfI did not indicate a preference.
- Loughs Agency agree that these were the environmental strategic objectives they would expect to see in the Remediation Strategy for the Mobuoy site.
- Loughs Agency ranked the protection of surface water quality at the River Faughan and feed tributaries as the most important environmental objective.
- Loughs Agency agree that they would expect to see the strategic objective of creating long-term benefit to the site and wider community included.
- The response from DfI Roads was technical in nature and provided views and comments predominantly on the engineering aspects of the remediation proposals and the interface between the Mobuoy Remediation Project and the proposed A6 route. While Department for Infrastructure (DfI) Roads did not explicitly state whether they were supportive or unsupportive of the strategy, their response indicates they are supportive of the draft Remediation Strategy proposals but recognise the need for detailed design information to make a full evaluation in the context of their work area. Many important points were raised for consideration in future refinements of the draft Remediation Strategy and in any future design phases. All of the potential issues raised can be managed through ongoing collaboration.

## **Summary of Responses from the Local Council**

The response from Derry City and Strabane District Council (**DCSDC**) indicates:

- While not explicitly stating that the draft Remediation Strategy is the right way to remediate the site, that DCSDC are supportive of the need to remediate the site, subject to further consideration of aspects of the risk assessments, additional detailed design information, and clarity on how the site's future use can be safely accommodated.
- The response from DCSDC was technical in nature and provided views and comments on the draft Remediation Strategy that was consulted on and the technical work carried out to inform the draft Remediation Strategy. In summary, many important points were raised for consideration for updating the draft Remediation Strategy document and in any future design phases.

## Summary of Responses from other local organisations

Only 1 response was received from other local organisations. The response from **other local organisations** was:

- Young Men's Christian Association (YMCA) disagree that the draft Remediation Strategy is the right is to remediate the site. YMCA suggested that it may be better to leave the site undisturbed.
- YMCA disagree that the draft Remediation Strategy will achieve the remediation strategic objectives.
- YMCA disagree that where difficult decisions around funding need to be made to allocate resources, funding should be focused on the zones of highest environmental risk.
- YMCA agree that the listed environmental strategic objectives are appropriate for, and would be expected to be seen in, the draft Remediation Strategy.
- YMCA ranked the protection of surface water quality at the River Faughan and feed tributaries as the most important environmental objective.
- YMCA disagree that they would expect to see the strategic objective of creating long-term benefit to the site and wider community included.
- YMCA disagree that they would expect to see the strategic objective allowing integration with the future A6 road scheme and wider public interests included, highlighting environmental concerns about the risk to the environment from the construction phase of the A6 road scheme.

## 2.0 Introduction

The Northern Ireland Environment Agency (NIEA), an executive agency within the Department of Agriculture, Environment & Rural Affairs (DAERA), recently completed a consultation on the draft Remediation Strategy for the Mobuoy Road site.

The consultation on the draft Remediation Strategy for the Mobuoy site was undertaken to ensure that stakeholders, technical specialists, community groups, and members of the public had the opportunity to review and comment on the proposed approach for addressing the environmental challenges presented at the Mobuoy site.

Site investigations indicate there is currently up to 1.6 million m<sup>3</sup> of waste present at the site which includes a mix of domestic, industrial hazardous waste (tarry waste), construction/demolition, and metallic waste. This estimated volume includes historical waste, which was not deposited by the recent offenders. Some of this waste dates back to the 1960s. The site sits adjacent to the River Faughan. The River Faughan is a Special Area of Conservation and is a key drinking water source for a NI Water Treatment works, serving a population of around 60,000 people. Protecting the water quality in the River Faughan is of utmost importance in safeguarding public health, ensuring safe drinking water and protecting the environment.

## 2.1 Mobuoy Remediation Project Background

The consultation responses received via Citizen Space were structured and guided by the consultation questions that were posed. The consultation questions requested a quantitative yes or no response, with further explanatory information where appropriate.

### Commitment to Water Quality and Public Health

The NIEA is committed to protecting the water quality of the River Faughan and working in partnership with NI Water to safeguard of the drinking water supply, which serves approximately 60,000 customers across the northwest region.

The protection of water quality in the River Faughan is an environmental objective that underpins the Remediation Strategy for the Mobuoy site. In support of this objective, NIEA implements a comprehensive [Environmental Monitoring Programme](#) (EMP). The EMP encompasses regular water quality monitoring of the River Faughan

### Development of the Draft Remediation Strategy

To address the environmental challenges presented at the Mobuoy site, the NIEA, with the support of specialist contaminated land experts, has developed a draft Remediation Strategy with the objective of delivering long-term environmental protection and improvement.

In line with UK guidance, [Land Contamination: Risk Management](#) (LCRM), a sustainable approach to remediation has been taken. This means the strategy has been carefully designed to strike a balance between environmental protection, social responsibility, and economic feasibility. Taking this approach supports government obligations under the Climate Change Act in Northern Ireland by aligning remediation practices with the Act's goals of reducing greenhouse gas emissions and promoting environmental sustainability.

The process involved in developing the strategy stemmed from an [updated Detailed Quantitative Risk Assessment](#), completed in 2022. This assessment drew upon findings from [extensive site investigations](#), as well as surface water and groundwater data collected from more than seven years of ongoing monitoring. All of this information enabled a detailed evaluation of a range of possible remediation options and the details of this evaluation are presented in a [Remediation Options Appraisal](#) report.

## **Technical Proposal and Public Consultation**

The draft Remediation Strategy that was consulted upon sets out the preferred technical solution, that arose following the completion of a Remediation Options Appraisal, aimed at delivering the most effective and sustainable remedial approach to -

1. Protect water quality in the River Faughan and the public drinking water supply abstracted from it;
2. Improve local groundwater quality in the Faughan Groundwater Body;
3. Safeguard public health; and
4. Minimise the environmental impact of illegally buried waste.

The NIEA has followed a robust, evidence-based process to develop a strategy that will address the complex environmental challenges presented by the site.

To make sure the strategy addressed the needs and priorities of everyone involved, and to give all stakeholders a chance to share their views, NIEA carried out a comprehensive public consultation. This consultation was designed to gather valuable feedback from a wide range of stakeholders, including technical experts, community representatives, and the general public. The feedback and comments through this process were assessed, and where appropriate, used to inform and refine the final Remediation Strategy.

## **Determining the Preferred Approach**

Following the conclusion of the public consultation, the NIEA will present the preferred remediation approach for the Mobuoy site to the DAERA Minister for consideration.

The consultation is important, it enabled the NIEA to gather a wide range of stakeholder perspectives on the draft Remediation Strategy. The diverse feedback collected provided

important information on the priorities and concerns of project stakeholders to support the development of a draft Remediation Strategy that is considered, evidence-based, and robust.

## **Stakeholder Engagement**

The Public Consultation provided stakeholders with an opportunity to share any information for consideration in shaping the remediation approach for the Mobuoy site. By inviting input from a broad spectrum of contributors, the process aimed to ensure that all relevant expertise and perspectives were considered in the development of a robust and effective strategy.

## 3.0 Public Consultation

### 3.1 Background

The consultation opened on 13 June 2025 and closed on 2 October 2025, providing a 16-week consultation period. Respondents were able to submit their views through Citizen Space, email, or written correspondence, with supporting materials such as the Detailed Quantitative Risk Assessment, Remediation Options Appraisal and related technical information made available to assist in understanding the scientific basis for the draft strategy. Public information events were held on 3rd September 2025 (Eglinton Community Centre) and on 10th September 2025 (Millennium Forum, Derry), as well as several stakeholder briefings, to support accessibility and encourage participation from local residents, locally elected representatives, environmental organisations, industry specialists, and the wider public.

The consultation invited views on key aspects of the draft Remediation Strategy, including the proposed technical approach, the strategic remediation objectives, and how priorities should be set in the context of environmental risk and the realities of public funding constraints. Respondents were encouraged to reference specific elements of the draft strategy and provide quantitative and qualitative feedback. This enabled the NIEA to capture a balanced evidence base reflecting professional expertise, community perspectives, operational considerations, and environmental concerns.

All technical responses received throughout the consultation have been carefully reviewed and evaluated by appointed ICT consultants, recognised experts in contaminated land. These specialists provided independent scrutiny of the submissions, ensuring that the evaluation of feedback was underpinned by robust technical expertise and industry best practice. Appropriate scientific and technical feedback will be incorporated into the final Remediation Strategy.

In line with the Land Contamination Risk Management framework, it is important to recognise that the draft Remediation Strategy is an outline technical proposal, with the detailed design to be developed in the subsequent stages of the process.

### 3.2 Scope of the Public Consultation

The NIEA sought the views from the public on the technical options presented in the draft Remediation Strategy. The consultation represented an important step towards planning for remediation of the site. The information gathered during the consultation will be considered and will inform any necessary updates / amendments to the draft Remediation Strategy.

### 3.3 Outside the Scope of the Public Consultation

The implementation of any Remediation Strategy will be informed by wider public finance considerations and departmental approval processes. It is important to be aware of this as the financial feasibility of delivering any remediation will have to consider the available funding and timeframes over which a remediation strategy can be delivered.

The issues outside the scope of this consultation are: Affordability; Financial feasibility; and Timeframes for delivering the remediation.

## 4.0 Strategic Remediation Objectives

Under Article 4 of the Water (NI) Order 1999, DAERA has a duty to promote the cleanliness of water in waterways and underground strata and, when exercising its functions in relation to the cleanliness of water, we must have regard to the protection of human health. In exercising this duty, the draft Remediation Strategy has been developed with the following key strategic remediation objectives:

1. Protection of surface water quality at the River Faughan and feed tributaries.
2. Improvement in the quality of the Faughan groundwater body.
3. Protection of the quality of NI Water's raw water abstraction at Cloghole (for Carmoney Water Treatment Works).
4. Reduction of landfill gas to acceptable levels to protect site users.
5. Creation of long-term benefit to the site and the wider community which aligns to the site vision.
6. Integration with the future A6 Roads scheme and wider public interests.

## 5.0 draft Remediation Strategy

The draft Remediation Strategy has been developed to deliver the long-term remediation of the Mobuoy site, based on the best balance of environmental, social, and economic factors.

The draft strategy is a highly technical document which essentially sets out a plan of how to remediate the site, providing proposals on how best to mitigate the effects on the natural environment, reduce the risk to human health, and protect against the risk from the site to the drinking water supply for the people of the Northwest. This approach to remediation of the site, does not take into account any wider strategic or contextual issues including the priorities of the Executive and the public finance environment. Work around this will progress post consultation - see next steps section.

### How the draft Remediation Strategy was developed

The [draft strategy](#) was developed in line with UK best practice and in accordance with the principles and processes detailed in the Environment Agency's Land Contamination Risk Management guidance ("LCRM"). It does not, on its own, make for an easy read due to its technical nature, and was as part of a more accessible [consultation package](#). This consultation was designed to contextualise and introduce the draft strategy, as well as providing questions and guidance on how to provide a response.

In line with the requirements of the LCRM process and good practice, the consultation process was designed to ensure engagement with various stakeholders, including political representatives and local residents. The public consultation was designed to provide the opportunity for all stakeholders or interested parties to respond and provide their input for consideration.

It is not guaranteed that everything from the draft Remediation Strategy will be delivered, but it is important to develop a preferred approach that is both affordable and deliverable.

Delivery of a preferred strategy is required to mitigate against the long-term risk that the contaminated site poses to the water quality in the river Faughan and to address its contamination of the Faughan Groundwater Body.

Carmoney Water Treatment Works takes its supply from river water abstracted from the Cloghole abstraction point, less than 2km downstream of the Mobuoy site. Northern Ireland Water has indicated that this water treatment works supplies drinking water to a population of 60,000.

The '[Detailed Quantitative Risk Assessment](#)' carried out for the site, following extensive site investigations and utilising over six years of monitoring, systematically evaluated and quantified risks to provide a clear understanding of potential impacts and their likelihood.

Robust short-term contingency measures are in place, but the remediation of the site is required to protect the long-term safety of drinking water supply from the risks attributable to the Mobuoy site.

## **Potential Remediation Strategy implementation timeline**

The timelines for planning to implement reflect the timelines of Government approval processes, resolution of land ownership issues, and the preparation and processing of a planning application, and the procurement of a specialist remediation construction contractor which collectively could take a significant amount of time, before physical remedial works can commence.

Remediation of Mobuoy is a cross-cutting issue, carrying significant risks. It remains a high profile and contentious issue. It has become clear that delivering a holistic and cost-effective remediation of the site will involve four government parties (DAERA, DfI Planning, DfI Roads and NI Water). In recognition of this, an Integrated Site Strategy has been developed and approved by DAERA and DfI outlining how a single integrated site strategy will be achieved and the governance arrangements which will apply.

## **The importance of achieving the Remediation Objectives**

The Remediation Strategy is driven by the need to protect water quality of the River Faughan to ensure protection of public health, compliance and enforcement of relevant environmental regulations and management of potential infraction risks. Failure to remediate the site carries a number of risks, for example, risk to NI Water's raw drinking water source at the Cloghole abstraction on the River Faughan which is located approximately 2 miles downstream of the illegal waste site.

Ground and surface water flowing through the Mobuoy site which provides base flow to the River Faughan becomes contaminated by the waste that has been illegally deposited on the Mobuoy site.

## **Integration with the proposed route of the A6 road scheme**

Phase 2 of the A6 Derry to Dungiven dual carriageway project extends from Drumahoe to the A2 Caw roundabout.

Part of the works will encroach on the Mobuoy site, and NIEA is working closely with DfI Roads colleagues to ensure an integrated approach so that the projects are coordinated and can progress efficiently.

There is currently no timescale for this scheme's delivery. The delivery of this scheme will be subject to any future Executive decisions and priorities, the availability of funding and the coordination with any remedial works required at the Mobuoy Road waste site.

## 6.0 Consultation Response Data

The consultation opened on **13 June 2025** and closed on **2 October 2025** and, by then, a total of **26** responses were received from a range of individuals, organisations, and bodies, as well as Derry City and Strabane District Council and the Department for Infrastructure Roads.

No responses were received beyond the deadline.

As with any Northern Ireland Civil Service public consultation, responses were received from a self-selecting range of respondents. This inevitably introduces the potential for selection bias. Therefore, there can be no assumption that the stakeholders who responded to the consultation were, or were not, fully representative of the wider population.

**Table 6.1** (below) is a breakdown summary of the profile of the responses to the consultation which were received by DAERA. Of the **26** discrete responses.

- 16 were received via Citizen Space containing quantitative and qualitative data.
- 2 were received via email containing quantitative and qualitative data.
- 1 was received In Person containing quantitative and qualitative data.
- 7 were received via emails to the DAERA mailbox containing qualitative data.

Table 6.1 below summarises who responded by type, identified as per their response. Respondents were given the opportunity to state which organisation (if any) with which they wished to identify (Type).

<b>Type</b>	<b>Number</b>
Individuals	9
Remediation / Construction Organisations	6
Chartered / Professional Body	3
Conservation / Environmental Organisation	4
Government Department / Body	2
Local Council	1
Local Organisation	1
<b>Total</b>	<b>26</b>

For ease of reference Table 6.2 outlines those organisations who responded by name with abbreviations where necessary.

<b>Table 6.2</b>		
<b>Name of Organisation</b>	<b>Abbreviation</b>	<b>Type of Organisation</b>
Construction Employers Federation (Northern Ireland)	CEF NI	Remediation / Construction Organisations
Convery Design Engineering Group	CDE Group	
Envirotrat Solutions Limited	ESL	
Indaver		
Keltbray		
Soil Treatment Systems Limited	STS	
Chartered Institution of Wastes Management (Northern Ireland)	CIWM NI	Chartered / Professional Bodies
Ireland Brownfield Network	IBN	
Queens University Belfast	QUB	
Faughan Anglers	RFA	Conservation / Environmental Organisations
Friends of the Earth	FOE	
The Gathering		
Ulster Wildlife	UW	
Department of Infrastructure	Dfi	Government Departments / Bodies
Loughs Agency	LA	
Derry City and Strabane District Council	DCSDC	Local Council
Londonderry YMCA	YMCA	Local Organisation

The consultation document enabled respondents to express their views on the draft Remediation Strategy, strategic objectives, and prioritising funding (if needed) to areas of highest environmental risk, indicating support or opposition. Respondents were also given the opportunity to provide comments on these objectives.

Not all respondents submitted comments; for those who did, this summary presents the primary remarks received. Comments have been reproduced as closely as possible to the original submissions, with minor amendments for clarity and readability. The analysis for each question includes the number of respondents, counts for and against, the volume of comments received, and highlights of key observations.

## 7.0 Consultation Methodology

**Stage 1** - Quantitative Responses: The quantitative responses were based on the data collected from the tick-box options, i.e. 'yes', 'no' or 'not answered' options, and a percentage analysis approach and application was applied to assess the preferred or dominant views within these responses.

**Stage 2** - Qualitative Responses: The qualitative data within the responses to the consultation i.e. comments provided; were analysed using a 'thematic analysis' method. This method examines the data, to identify common themes i.e. topics, ideas, and patterns of meaning which occur repeatedly across the collection of responses.

Further analysis of responses for each of the groups of respondents is provided.

The NIEA and appointed Intergrated Consultancy Team (ICT) consultants, who are experts in contaminated land, reviewed and evaluated the qualitative responses. ICT evaluation reports are appended to this report.

**Annex B** provides the ICT consultants' assessment of feedback and comments from all respondents, with the exception of submissions made by Derry City and Strabane District Council and DfI Roads. Due to a combination of the substantial and highly technical nature of their responses, combined with the responses not being guided by the consultation questions, responses from Derry City and Strabane District Council (**Annex C**) and DfI Roads (**Annex D**), were addressed in separate evaluation reports.

## 8.0 Consultation Responses

### 8.1 Overview of the Format of Responses

The consultation responses received via Citizen Space were structured and guided by the consultation questions that were posed. The consultation questions requested a quantitative yes or no response, with a further response option to provide reasons for the answer and/or put forward an alternative suggestion. Via email, two responses were received that were guided and structured by the consultation questions.

All other consultation responses received via email provided a range of information, including general feedback on the draft Remediation Strategy and views and opinions on matters outside the scope of this consultation.

Feedback and comments received outside of the scope of this consultation have not been included in this report.

### 8.2 What aspects of the draft Remediation Strategy mattered most?

Across all of the consultation responses received, the following key themes were identified as being what mattered most -

#### **Environmental Protection**

Protecting surface water quality in the River Faughan and its tributaries was viewed as a high priority by respondents. Along with protecting the quality of NI Water's raw water abstraction at Cloghole (for Carmoney Water Treatment Works) these aspects were generally ranked as the most important strategic objectives for remediation, highlighting the importance of protecting the River Faughan from contamination associated with the Mobuoy site.

The consultation responses acknowledged the interdependent relationship between groundwater in the Faughan groundwater body and surface water in the River Faughan. Improvement of groundwater quality was therefore recognised as an important strategic objective, not only to support the ongoing protection of water quality in the river but also to safeguard the River Faughan as a safe source for public drinking water supply abstraction.

Lowering landfill gas, particularly methane, was also raised as an important aspect of managing risk to the environment from the site. More information on proposals for how landfill gas emissions will be managed should be included in the Remediation Strategy to provide reassurance that landfill gas management is an important aspect of the Remediation Strategy.

## Draft Remediation Strategy and Remediation Methods

Whilst the majority of responses supported a sustainable approach to remediating the site, some responses highlighted concerns around the complexity of some of the individual remediation methods proposed in the draft Remediation Strategy. There were some concerns raised about how the individual remediation methods proposed would work together to address the contamination at the site and provide long term protection to the environment.

Some respondents submitted more detailed and specific design feedback on the remediation methods proposed, and this information will be considered at the appropriate stage of the project, such as the detailed design stage.

## Funding, Costs, and Implementation

Due to the current challenging constraints of public finances, some responses raised concerns about the availability of funding to complete the works that are presented in the draft Remediation Strategy.

Some responses expressed frustration over slow progress to date and the absence of clear timelines when remediation could be delivered.

## Future Use and Community Benefit

Any future use of the site plays an important role in shaping the approach to remediation and achieving the remediation objectives to address the long-term risks at the site is essential, not only for the environment but also for delivering lasting value to the local community.

Responses received displayed support for creating a long-term benefit for the site and the wider community, including educational, recreational, and economic opportunities. The long-term, visioning, process is an integral part of planning for the remediation of the site, and it is important that it aligns with the development of the detailed design of the Remediation Strategy. See **Annex A** Site Vision.

There were requests that the local community should be involved in shaping future plans for the site making sure that there is transparency between the NIEA and the local community.

In considering the nature of future site development, several respondents favoured a rewilding approach rather than developing the area as a public amenity. This perspective supports allowing the site to return to a more natural state, blending with the surrounding landscape, and contributing to local biodiversity.

## A6 Road Scheme

There were varied opinions regarding the integration of the future A6 road scheme with the remediation of Mobuoy site. Some respondents favoured a collaborative approach, suggesting

that combining the two projects could present opportunities for enhanced value for money. Other respondents indicated a preference for the A6 road scheme to be considered only after remediation of the Mobuoy site had been completed due to concerns for works associated with the road scheme to amplify the risks posed to the environment by the site.

Other views and opinions on the A6 road scheme were received but fell outside the scope of this consultation.

## **Climate Change and Flooding**

Some responses raised concerns about potential flood risk and climate resilience. They felt that the draft Remediation Strategy did not sufficiently address how these important issues would be managed and that the draft strategy would benefit from providing additional detail on the measures that are proposed to protect the Mobuoy site from the future impacts from climate change, such as flood defences.

### **8.3 Responses that were structured and guided by the consultation questions providing quantitative and qualitative data**

Out of the 26 responses received as part of the consultation process, 19 were presented in a structured format and were guided by or responded directly to the consultation questions. The other 7 responses received did not respond directly to the consultation questions and provided qualitative information only. Responses that provided qualitative information only are considered separately in Section 8.4 of this report.

Of the 19 responses that responded directly to the consultation questions - 16 responses were submitted via Citizen Space, 2 responses were received by email, and 1 response was collected in person by NIEA officers.

As part of the consultation process, participants were invited to answer seven specific questions. The following section presents a summary of the feedback received for each question. While it is not possible to detail every individual response within the qualitative analysis, all contributions have been thoroughly considered as part of the overall assessment. A sample of some of the key responses are provided.

**Table 8.1 - Breakdown of Responses that were structured and guided by the consultation questions providing quantitative and qualitative data**

Type	Number
Individuals	8 of 9
Remediation / Construction Organisations	5 of 6
Chartered / Professional Body	2 of 3
Conservation Organisation	2 of 4
Government Department / Body	1 of 2
Local Council	0 of 1
Local Organisation	1 of 1
<b>Total</b>	<b>19 of 26</b>

## Q1: Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site?

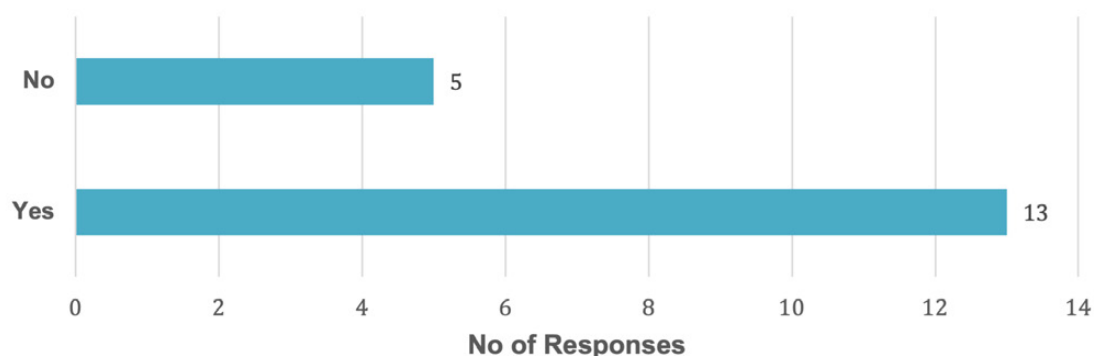
### Stage 1 - Quantitative Analysis

Of the 19 responses that responded directly to the consultation questions, there were 18 responses to this particular question, with 10 of those responses providing a reason for their answer. 1 respondent chose not to respond to this particular question.

**Table 8.2 - Q1: Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site?**

Option	Total	Percent*
Yes	13	68%
No	5	26%
Not Answered	1	-

\* Percentages are displayed as whole numbers, rounded either up or down when necessary.



## Stage 2 - Qualitative Analysis

### a. Individuals

#### Agree

Of the 8 individuals that responded directly to the consultation question, 5 of them agreed that the draft Remediation Strategy was the right way to remediate the site. One of the respondents highlighted that the remediation of tarry waste on the site should be a priority. The remaining individuals did not provide a reason for their answer.

#### Disagree

Of the 8 individuals that responded directly to the consultation question, 3 of them disagreed that the draft Remediation Strategy was the right way to remediate the site. Two of the three respondents provided reasons for their answer, which included -

*"I find the assumption that all the million tonnes of waste deposited between the road and the river is 'builders' /inert waste. Where would that volume of waste come from? There are numerous reports from fishermen that gas has been emitting from the 'lake' adjacent to the river. Would this be from inert waste?"*

*"The proposed solutions are extremely expensive, complex, unproven, maybe not capable of being implemented, may take too long to implement before contamination happens, and may eventually fail over time."*

### b. Remediation / Construction Organisations

#### Agree (CEF, CDE Group, ESL, Keltbray, STS)

Of the 5 remediation / construction organisations that responded directly to the consultation question, all of them agreed that the draft Remediation Strategy was the right way to remediate the site. Two of the contractors provided further technical information on some of the remediation solutions that are more appropriately considered during detailed design. The remaining organisations did not provide a reason for their answer.

#### Disagree

None of the remediation / construction organisations that responded directly to the consultation question, disagreed that the draft Remediation Strategy was the right way to remediate the site.

Indaver submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

### c. Chartered / Professional Bodies

#### Agree (QUB)

QUB was the only chartered / professional body that responded directly to the consultation question and agreed that the draft Remediation Strategy was the right way to remediate the site.

QUB provided further comment that *“the draft strategy in its current state does not allow for an effective technical appraisal of the favoured options nor does it contain enough synthesised information that would allow a remediation contractor to effectively design and cost such a project.”*

#### Disagree

n/a

CIWM NI submitted a response to the public consultation but did not answer this question directly.

IBN submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

### d. Conservation / Environmental Organisations

#### Agree (UW)

Of the 2 conservation / environmental organisations that responded directly to the consultation question, UW agreed that the draft Remediation Strategy was the right way to remediate the site.

UW did not provide a reason for their answer.

#### Disagree (FOE)

Of the 2 Conservation / Environmental Organisations that responded directly to the consultation question, FOE disagreed that the draft Remediation Strategy was the right way to remediate the site.

FOE provided further comment that *“the question is poorly phrased as it suggests that there is a (singular) “right” remediation strategy. It would have been better phrased as asking if the draft Remediation Strategy is a “reasonable” way to remediate the Mobuoy site.”*

RFA and The Gathering submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

#### **e. Government Departments / Bodies**

##### **Agree (LA)**

LA were the only government department to respond directly to the consultation question. LA agreed that the draft Remediation Strategy was the right way to remediate the site.

LA did not provide a reason for their answer.

##### **Disagree**

n/a

Dfl submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

#### **f. Local Council**

DCSDC submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

#### **g. Other Local Organisations**

##### **Agree**

n/a

##### **Disagree (YMCA)**

Only 1 local organisation responded directly to the consultation question. YMCA disagreed that the draft Remediation Strategy was the right way to remediate the site.

YMCA provided further comment that *"It's my opinion that it would be better left alone and let nature take over."*

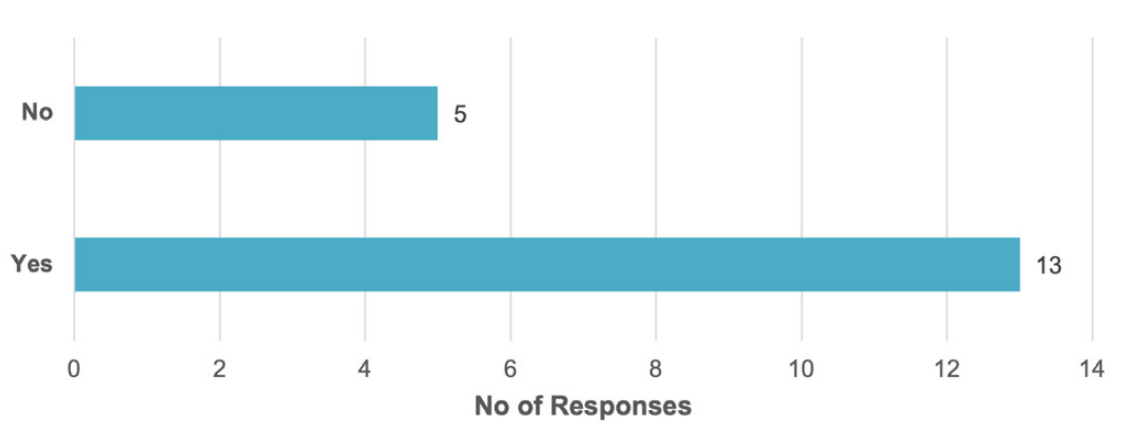
## Q2: Do you believe that implementation of the draft Remediation Strategy will achieve the remediation strategic objectives?

### Stage 1 - Quantitative Analysis

Of the 19 responses that responded directly to the consultation questions, there were 18 responses to this particular question with 8 of those responses providing a reason for their answer. 1 respondent chose not to respond to this particular question.

**Table 8.3 - Q2: Do you believe that implementation of the draft Remediation Strategy will achieve the remediation strategic objectives?**

Option	Total	Percent
Yes	13	72%
No	5	28%
Not Answered	1	-



### Stage 2 - Qualitative Analysis

#### a. Individuals

##### Agree

Of the 8 individuals that responded directly to the consultation question, 4 of them agreed that the implementation of the draft Remediation Strategy would achieve the remediation strategic objectives. One of the respondents highlighted that surface water management should also be included as a strategic objective.

##### Disagree

Of the 8 individuals that responded directly to the consultation question, 3 of them disagreed that the implementation of the draft Remediation Strategy would achieve the remediation strategic objectives.

One of the respondents highlighted concerns about the proposal to leave waste in the ground, particularly close to waterways. Another respondent commented that surface water management should also be included as a strategic objective.

A separate respondent commented that *“The proposed solutions are extremely expensive, complex, unproven, maybe not capable of being implemented, may take too long to implement before contamination happens, and may eventually fail over time.”*

### **Unsure**

Of the 8 individuals that responded directly to the consultation question, 1 of them were unsure whether the implementation of the draft Remediation Strategy would achieve the remediation strategic objectives. They highlighted that *“the site needs to be monitored for years to come following the remediation work.”*

### **b. Remediation / Construction Organisations**

**Agree** (CEF, CDE Group, ESL, Keltbray, STS)

Of the 5 remediation / construction organisations that responded directly to the consultation question, all of them agreed that the draft Remediation Strategy would achieve the remediation strategic objectives. One of the contractors commented that further design information would be required due to the range of contaminants at the site. The remaining organisations did not provide a reason for their answer.

### **Disagree**

None of the remediation / construction organisations that responded directly to the consultation question, disagreed that the draft Remediation Strategy would achieve the remediation strategic objectives.

Indaver submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

### **c. Chartered / Professional Bodies**

QUB was the only chartered / professional body that responded directly to the consultation question and agreed that the draft Remediation Strategy would achieve the remediation strategic objectives.

QUB provided further comment that *“the draft strategy in its current state does not allow for an effective technical appraisal of the favoured options nor does it contain enough synthesised information that would allow a remediation contractor to effectively design and cost such a project.”*

### **Disagree**

n/a

CIWM NI submitted a response to the public consultation but did not answer this question directly.

IBN submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

#### **d. Conservation / Environmental Organisations**

##### **Agree (UW)**

Of the 2 conservation / environmental organisations that responded directly to the consultation question, UW agreed that the draft Remediation Strategy would achieve the remediation strategic objectives.

UW did not provide a reason for their answer.

##### **Disagree (FOE)**

Of the 2 Conservation / Environmental Organisations that responded directly to the consultation question, FOE disagreed that the draft Remediation Strategy would achieve the remediation strategic objectives.

FOE provided further comment that *“The documentation suggests that “a range of remedial solutions, which will work together, are proposed. These solutions fall under two broad categories - Off-Site Disposal and In-Situ treatment” - which is not strictly accurate as there are some on site ex-situ processes as well, such as sorting and testing of excavated waste.”*

#### **e. Government Departments**

##### **Agree (LA)**

Loughs Agency were the only government department to respond directly to the consultation question. LA agreed that the draft Remediation Strategy would achieve the remediation strategic objectives.

LA did not provide a reason for their answer.

##### **Disagree**

n/a

Dfl submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

#### **f. Local Council**

DCSDC submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

### g. Other Local Organisations

#### Agree

n/a

#### Disagree (YMCA)

Only 1 local organisation responded directly to the consultation question. YMCA disagreed that the draft Remediation Strategy would achieve the remediation strategic objectives.

YMCA provided further comment that *“I personally think that nobody knows the extent of this dump or what’s in it.”*

### Q3: Where difficult decisions around funding need to be made to allocate resources, should funding be focused on the zones of highest environmental risk?

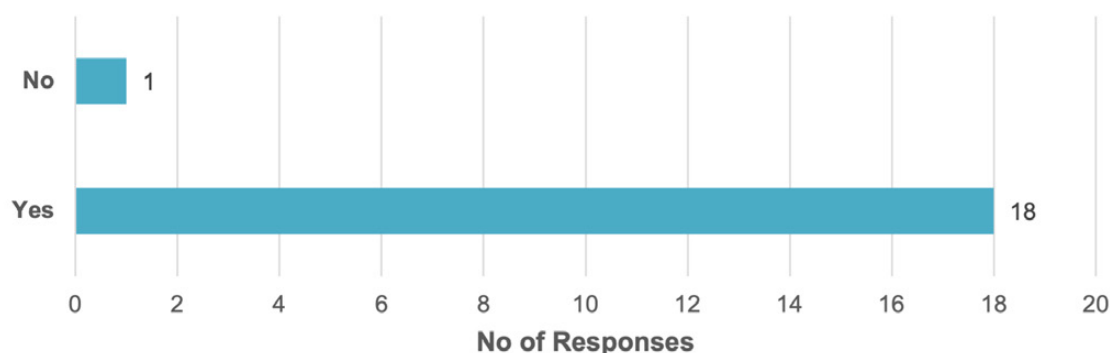
#### Stage 1 - Quantitative Analysis

Of the 19 responses that responded directly to, the consultation questions, there were 19 responses to this particular question with 14 of those responses providing a reason for their answer.

**Table 8.4 - Q3: Where difficult decisions around funding need to be made to allocate resources, should funding be focused on the zones of highest environmental risk?**

Option	Total	Percent*
Yes	18	95%
No	1	5%
Not Answered	-	-

\* Percentages are displayed as whole numbers, rounded either up or down when necessary.



## Stage 2 - Qualitative Analysis

### a. Individuals

#### Agree

Of the 8 individuals that responded directly to the consultation question, all of them agreed that where difficult decisions around funding need to be made to allocate resources, funding should be focused on the zones of highest environmental risk.

Comments from individuals included, *“tarry waste sites need prioritised”, “at least it will make a start to get the waste removed”, “the carcinogenic waste should be contained first but all the waste should be treated eventually”, and “this is obvious as the river water needs to be protected for drinking.”*

#### Disagree

None of the individuals that responded directly to the consultation question, disagreed that where difficult decisions around funding need to be made to allocate resources, funding should be focused on the zones of highest environmental risk.

### b. Remediation / Construction Organisations

#### Agree (CEF, CDE Group, ESL, Keltbray, STS)

Of the 5 remediation / construction organisations that responded directly to the consultation question, all of them agreed that where difficult decisions around funding need to be made to allocate resources, funding should be focused on the zones of highest environmental risk. Two of the contractors provided further technical information on some of the remediation solutions that are more appropriately considered during detailed design. The remaining organisations did not provide a reason for their answer.

Indaver submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

#### Disagree

None of the remediation / construction organisations that responded directly to the consultation question, disagreed that where difficult decisions around funding need to be made to allocate resources, funding should be focused on the zones of highest environmental risk.

### c. Chartered / Professional Bodies

#### Agree (QUB, CIWM NI)

QUB and CIWM NI both agreed that where difficult decisions around funding need to be made to allocate resources, funding should be focused on the zones of highest environmental risk.

QUB provided further comment that *“Where pollutant linkage(s) have been correctly identified and there is the significant possibility of significant harm there is a legal obligation to manage that risk. This should not be seen as an opportunity to avoid doing what is ethically and professionally correct.”*

CIWM NI provided further comment “CIWM Northern Ireland see this as a must to ensure the protection of the Faughan River as a potable (drinking) water supply and as a sensitive ecological receptor (Lough Foyle and tributaries Special Area of Conservation), Lough Foyle Special Protected Area and RAMSAR sites, Area of Special Scientific Interest.”

CIWM NI also commented, *“It is CIWM Northern Ireland’s position that ‘ecology’ is currently not a high environmental risk, but it acknowledges the referenced report’s findings that remediation works have the potential to cause ‘habitat degradation’ adding that ‘habitats should be left intact during any works, with appropriate measures to protect them.’”*

#### **Disagree**

n/a

IBN submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

#### **d. Conservation / Environmental Organisations**

##### **Agree (UW)**

Of the 2 conservation / environmental organisations that responded directly to the consultation question, UW agreed that where difficult decisions around funding need to be made to allocate resources, funding should be focused on the zones of highest environmental risk.

UW provided further comment that *“The timeline and processes for continuous appraisal of options to ensure the decision processes retain sufficient flexibility to respond to aspects of risk and opportunity, for example - new data as remediation proceeds, additional funding provision forecasted/awarded, new standards set, risks mitigated.”*

##### **Disagree (FOE)**

Of the 2 Conservation / Environmental Organisations that responded directly to the consultation question, FOE disagreed that where difficult decisions around funding need to be made to allocate resources, funding should be focused on the zones of highest environmental risk.

FOE provided further comment that *“a cost-benefit analysis is needed to ensure optimal return on investment in the form of remediation expenditure.”*

RFA and The Gathering submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

## **e. Government Departments**

### **Agree (LA)**

Loughs Agency were the only government department to respond directly to the consultation question. LA agreed that where difficult decisions around funding need to be made to allocate resources, funding should be focused on the zones of highest environmental risk.

LA provided further comment *“It is essential that zones 5 to 9 are fully remediated to prevent impacts on the River Faughan Special Area of Conservation. These zones are adjacent to the River Faughan.”*

### **Disagree**

n/a

DfI submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

## **f. Local Council**

DCSDC submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

## **g. Other Local Organisations**

### **Agree (YMCA)**

Only 1 local organisation responded directly to the consultation question. YMCA agreed that where difficult decisions around funding need to be made to allocate resources, funding should be focused on the zones of highest environmental risk.

YMCA did not provide a reason for their answer.

### **Disagree**

n/a

## Q4 (a): Are these the (four environmental) strategic objectives you would expect to see in the Remediation Strategy for the Mobuoy site?

### Stage 1 - Quantitative Analysis

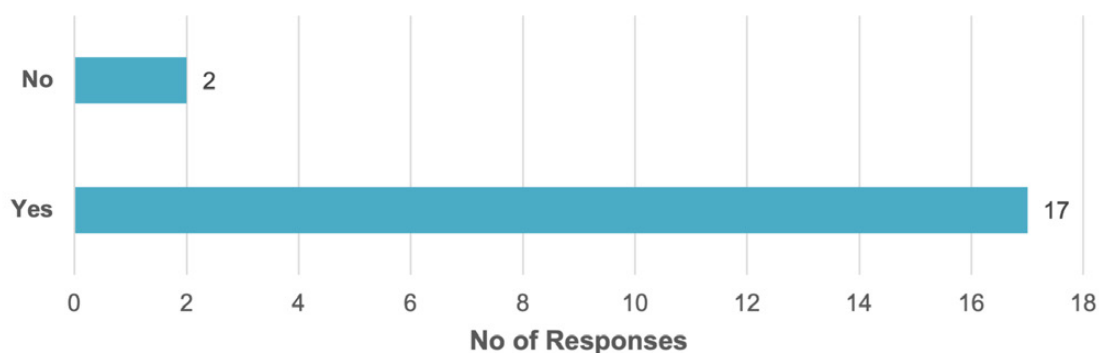
There were 19 responses with 13 respondents giving reasons for their answers to this question.

Of the 19 responses that responded directly to the consultation questions, there were 19 responses to this particular question with 13 of those responses providing a reason for their answer.

**Table 8.5 - Q4 (a): Are these the (four environmental) strategic objectives you would expect to see in the Remediation Strategy for the Mobuoy site?**

Option	Total	Percent*
Yes	17	89%
No	2	11%
Not Answered	-	-

\* Percentages are displayed as whole numbers, rounded either up or down when necessary.



### Stage 2 - Qualitative Analysis

#### a. Individuals

##### Agree

Of the 8 individuals that responded directly to the consultation question, 7 of them agreed that these were the environmental strategic objectives they would expect to see in the Remediation Strategy for the Mobuoy site. Two of the three respondents provided reasons for their answer, which included -

*“Surface water management needs to be considered as an objective.”*

*“Reroute the river to protect it.”*

“To safeguard the public permanently NI Water should be made build an intake upstream of the dump.”

The remaining individuals did not provide a reason for their answer.

### **Disagree**

Of the 8 individuals that responded directly to the consultation question, 1 of them disagreed that these were the environmental strategic objectives they would expect to see in the Remediation Strategy for the Mobuoy site. The respondent provided the following reason for their answer -

*“Remove all of the waste”*

### **b. Remediation / Construction Organisations**

**Agree** (CEF, CDE Group, ESL, Keltbray, STS)

Of the 5 remediation / construction organisations that responded directly to the consultation question, all of them agreed that these were the environmental strategic objectives they would expect to see in the Remediation Strategy for the Mobuoy site.

ESL commented that *“these objectives seem perfectly reasonable and are as expected”*.

Two of the contractors, CDE and STS, provided further technical information on some of the remediation solutions that are more appropriately considered during detailed design.

The remaining organisations did not provide a reason for their answer.

### **Disagree**

None of the remediation / construction organisations that responded directly to the consultation question, disagreed that these were the environmental strategic objectives they would expect to see in the Remediation Strategy for the Mobuoy site.

Indaver submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

### **c. Chartered / Professional Bodies**

**Agree** (QUB, CIWM NI)

QUB and CIWM NI responded directly to the consultation question and agreed that these were the environmental strategic objectives they would expect to see in the Remediation Strategy for the Mobuoy site.

QUB provided further comment that they *“would also expect that any remediation on the site considers its future use and the proposed Remediation Strategy makes the site ‘suitable for use’*”.

CIWM NI provided the following comments -

*“Objective no. 2 as it is stated in the consultation document, “The Faughan groundwater body has been polluted from wastes deposited at the Mobuoy site. This resulted in the reclassification*

*of the Faughan Groundwater body from 'good' to 'poor' status in 2021 under The European Water Framework Directive (2000/60/EC) (WFD). CIWM NI would welcome Objective no. 2 being revised to refer to sources other than the (relatively recently) deposited wastes."*

*"Objective no. 4 in the context of the most recent published landfill gas risk assessment that finds 'perceived low risk via potential off-site lateral migration is low'. The acceptability of the 'low risk' in the context of remediation being required, or not, has not been made clear in the referenced report and CIWM Northern Ireland suggests this ambiguity should be clarified."*

## **Disagree**

n/a

IBN submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

## **d. Conservation / Environmental Organisations**

### **Agree (UW)**

Of the 2 conservation / environmental organisations that responded directly to the consultation question, UW agreed that these were the environmental strategic objectives they would expect to see in the Remediation Strategy for the Mobuoy site.

UW did not provide a reason for their answer.

### **Disagree (FOE)**

Of the 2 Conservation / Environmental Organisations that responded directly to the consultation question, FOE disagreed that these were the environmental strategic objectives they would expect to see in the Remediation Strategy for the Mobuoy site.

FOE provided further comment that *"The objectives are both too vague and not necessarily likely to result in the necessary management of risk."*

RFA and The Gathering submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

## **e. Government Departments / Bodies**

### **Agree (LA)**

Loughs Agency were the only government department to respond directly to the consultation question. LA agreed that these were the environmental strategic objectives they would expect to see in the Remediation Strategy for the Mobuoy site.

LA provide the following comment to support their answer, “Loughs Agency are content with the environmental objectives. The risk posed to the Special Area of Conservation and Atlantic salmon in particular is high.”

**Disagree**

n/a

Dfl submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

**f. Local Council**

DCSDC submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

**g. Other Local Organisations**

**Agree** (YMCA)

Only 1 local organisation responded directly to the consultation question. YMCA agreed that these were the environmental strategic objectives they would expect to see in the Remediation Strategy for the Mobuoy site.

YMCA provided further comment that *“I personally think that nobody knows the extent of this dump or what’s in it. There is a risk that remediation works could mobilise contamination.”*

**Disagree**

n/a

**Q4 (b): How would you rank these four environmental objectives in order of importance, starting with the most important?**

**Stage 1 - Quantitative Analysis**

Of the 19 responses that responded directly to, the consultation questions, there were 15 responses to this particular question by providing a ranking for the four environmental objectives in order of perceived importance.

(i) Overall Ranking

Method for Calculating Ranking Scores

To determine the overall ranking for Question 4(b), each respondent’s rankings were converted into a weighted scoring system.

First-place rankings were assigned 4 points, second-place 3 points, third-place 2 points, and fourth-place 1 point.

The total points for each objective were then summed across all responses to this question and divided by the number of respondents who provided rankings, producing an average weighted score.

These average scores were used to generate the final order of priority for the four environmental objectives.

**Table 8.6 Based on responses received, the ranking in order of importance of the environmental objectives**

<b>Item</b>	<b>Rank</b>	<b>Score</b>
Protection of surface water quality at the River Faughan and feed tributaries.	1	3.60
Protection of the quality of NI Water’s raw water abstraction at Cloghole (for Carmoney Water Treatment Works).	2	2.73
Improvement in the quality of the Faughan groundwater body.	3	2.27
Reduction of landfill gas to acceptable levels to protect site users.	4	1.40

Analysis of the ranking exercise shows the relative importance of the four environmental objectives. It is noted that the small sample size increases the potential for outlier results to skew the analysis, therefore, the interpretation of the results has been limited to a basic overview assessment.

In terms of perceived importance, respondents generally ranked the protection of water quality in the River Faughan or at the NI Water raw water abstraction from it at Cloghole as the most important environmental strategic objectives.

Although the improvement of the Faughan Groundwater Body was ranked third overall, and the reduction of landfill gas to acceptable levels was ranked fourth overall, some respondents did prioritise these objectives over the protection of water quality in the River Faughan and at NI Water’s abstraction at Cloghole.

With consideration for the results of the ranking exercise, alongside the qualitative information discussed later in this report, it is fair to say that all of the strategic environmental objectives are important and that personal stakeholder views are likely to contribute to the order of priority. For example, some respondents may have taken the view that protecting surface water quality at the River Faughan will, in turn, protect the quality of NI Water’s raw water abstraction at Cloghole, subsequently ranking protecting surface water quality higher than protecting the raw abstraction.

(ii) Breakdown of scoring of each of the strategic environmental objectives

<b>Table 8.7: Protection of surface water quality at the River Faughan and feed tributaries</b>		
<b>Option</b>	<b>Total</b>	<b>Percent*</b>
1	10	59%
2	4	24%
3	1	6%
4	0	0%
Not Answered	2	12%

\* Percentages are displayed as whole numbers, rounded either up or down when necessary.

<b>Table 8.8: Protection of the quality of NI Water's raw water abstraction at Cloghole (for Carmoney Water Treatment Works).</b>		
<b>Option</b>	<b>Total</b>	<b>Percent*</b>
1	4	24%
2	6	35%
3	2	12%
4	3	18%
Not Answered	2	12%

\* Percentages are displayed as whole numbers, rounded either up or down when necessary.

<b>Table 8.9: Improvement in the quality of the Faughan groundwater body</b>		
<b>Option</b>	<b>Total</b>	<b>Percent*</b>
1	0	0%
2	5	29%
3	9	53%
4	1	6%
Not Answered	2	12%

\* Percentages are displayed as whole numbers, rounded either up or down when necessary.

**Table 8.10: Reduction of landfill gas to acceptable levels to protect site users**

Option	Total	Percent*
1	1	6%
2	0	0%
3	3	18%
4	11	65%
Not Answered	2	12%

\* Percentages are displayed as whole numbers, rounded either up or down when necessary.

The detailed breakdown tables provide further insight into how respondents distributed their rankings across the four environmental objectives.

Tables 8.7 to 8.10 provide more detailed information on how respondents distributed their rankings across the four strategic environmental objectives.

The limited sample size provides little representative information to interpret. However, the breakdown tables further support the prioritisation of environmental objectives that protect water quality in the River Faughan, whether that be for general water quality in the channel, or specifically the NI Water raw water abstraction used to supply public drinking water. As supported by qualitative comments and feedback received, improving the quality of the Faughan groundwater body and reducing landfill gas is still important.

### **Q5: Would you expect to see the strategic objective of creating long-term benefit to the site and wider community included?**

#### **Stage 1 - Quantitative Analysis**

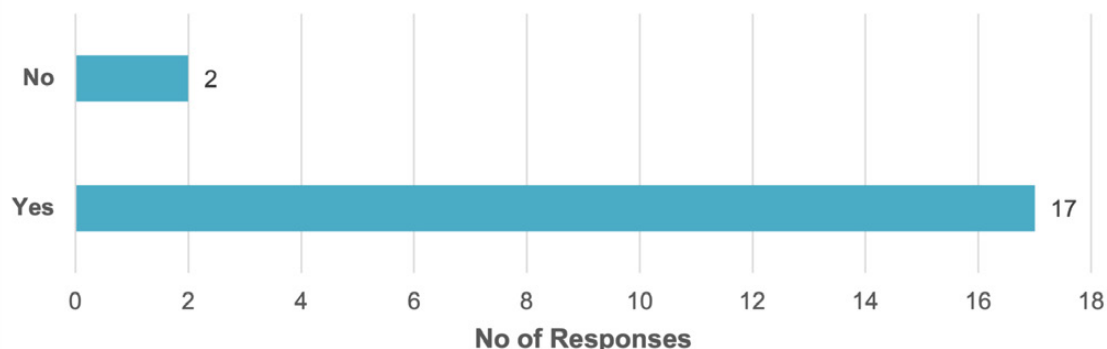
There were 19 responses with 12 respondents giving reasons for their answers to this question.

Of the 19 responses that responded directly to, the consultation questions, there were 19 responses to this particular question with 12 of those responses providing a reason for their answer.

**Table 8.11 - Q5: Would you expect to see the strategic objective of creating long-term benefit to the site and wider community included?**

Option	Total	Percent*
Yes	17	89%
No	2	11%
Not Answered	-	-

\* Percentages are displayed as whole numbers, rounded either up or down when necessary.



## Stage 2 - Qualitative Analysis

### a. Individuals

#### Agree

Of the 8 individuals that responded directly to the consultation question, 7 of them agreed that they would expect to see the strategic objective of creating long-term benefit to the site and wider community included.

One of the respondents commented that it would *“bring some good out of this disaster.”*

Another commented, *“Although this is a large site the only effect it has on the wider community is the water we are drinking! The river is an ASSI....”*

The remaining individuals did not provide a reason for their answer.

#### Disagree

Of the 8 individuals that responded directly to the consultation question, 1 of them disagreed that they would expect to see the strategic objective of creating long-term benefit to the site and wider community included.

The respondent did not provide a reason for their answer.

### b. Remediation / Construction Organisations

#### Agree (CEF, CDE Group, ESL, Keltbray, STS)

Of the 5 remediation / construction organisations that responded directly to the consultation question, all of them agreed that they would expect to see the strategic objective of creating long-term benefit to the site and wider community included. 2 of the organisations, CDE and STS, provided further technical information on some of the remediation solutions that are more appropriately considered during detailed design.

The remaining organisations did not provide a reason for their answer.

## Disagree

None of the remediation / construction organisations that responded directly to the consultation question, disagreed that they would expect to see the strategic objective of creating long-term benefit to the site and wider community included.

Indaver submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

## c. Chartered / Professional Bodies

### Agree (QUB, CIWM NI)

QUB and CIWM NI responded directly to the consultation question and agreed that they would expect to see the strategic objective of creating long-term benefit to the site and wider community included.

QUB provided the following reason for their answer, *“There are several educational opportunities within this site remediation strategy and the surrounding area. There should be an element of Co-Design within the Remediation Strategy around the final use of the site and how the public will interact with it. There are opportunities for Citizen Science programs where the public can take part in the long-term monitoring of technologies adapted on site and at compliance points at the site boundaries and surrounding areas. The public should have access to all site monitoring data in an easy to access, and clear and transparent web page / app / other social media.”*

CIWM NI provided the following reason for their answer, *“CIWM Northern Ireland is pleased to read the Remediation Options Appraisal Report’s recognition that “It is important that the future remediation design integrates with the future site vision, options for the current site vision are being sought from the various stakeholders and once available will be incorporated into the detailed design.” and added that CIWM NI “recommends that future land use remediation options be reviewed to ensure they remain appropriate for the agreed final use of the site”*

## Disagree

n/a

IBN submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

## d. Conservation / Environmental Organisations

### Agree (UW, FOE)

Of the 2 conservation / environmental organisations that responded directly to the consultation question, both UW and FOE agreed that they would expect to see the strategic objective of creating long-term benefit to the site and wider community included.

FOE provided the following reason for their answer, *“Bringing the site back into beneficial use for the wider community is important in both healing the damage caused by the events at Mobuoy and also in ensuring the local community takes ownership of the site and the authorities maintain a “social licence to operate” the long term management of the site that many of the individual remediation techniques presume.”*

UW did not provide a reason for their answer.

### **Disagree**

n/a

RFA and The Gathering submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

## **e. Government Departments / Bodies**

### **Agree (LA)**

Loughs Agency were the only government department to respond directly to the consultation question. LA agreed that they would expect to see the strategic objective of creating long-term benefit to the site and wider community included.

LA provided the following reason for their answer, *“Given the location and scale of the site there is significant potential for social benefits following the remediation and restoration of the site. Loughs Agency, through our outreach and education function have the potential to liaise and work directly with community groups, schools, etc to provide education on the River Faughan and Atlantic salmon at a remediated site.”*

### **Disagree**

n/a

Dfl submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

## **f. Local Council**

DCSDC submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

## **g. Other Local Organisations**

### **Agree**

n/a

### **Disagree (YMCA)**

Only 1 local organisation responded directly to the consultation question. YMCA disagreed that they would expect to see the strategic objective of creating long-term benefit to the site and wider community included.

YMCA did not provide a reason for their answer.

## Q6: Would you expect to see integration with the future A6 Roads scheme and wider public interests included?

### Stage 1 - Quantitative Analysis

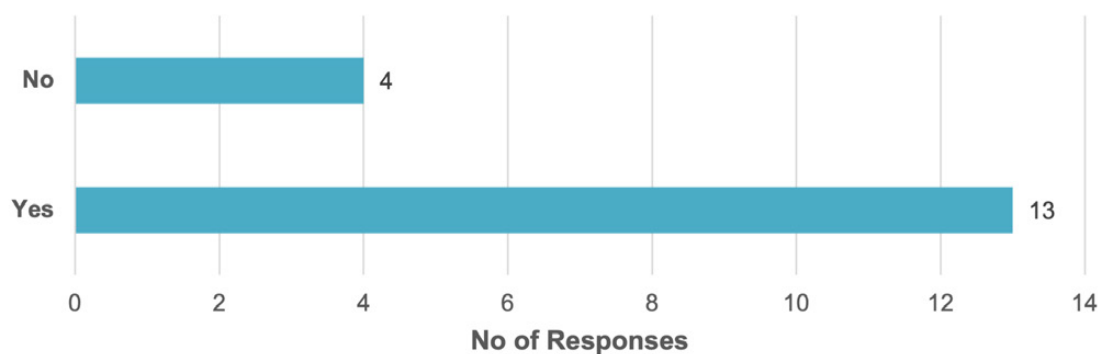
There were 17 responses with 10 respondents giving reasons for their answers to this question.

Of the 19 responses that responded directly to, the consultation questions, there were 17 responses to this particular question with 10 of those responses providing a reason for their answer. 2 respondents chose not to respond to this particular question.

**Table 8.12 - Q6: Would you expect to see integration with the future A6 Roads scheme and wider public interests included?**

Option	Total	Percent*
Yes	13	76%
No	4	24%
Not Answered	2	-

\* Percentages are displayed as whole numbers, rounded either up or down when necessary.



### Stage 2 - Qualitative Analysis

#### a. Individuals

##### Agree

Of the 8 individuals that responded directly to the consultation question, 6 of them agreed that they would expect to see the strategic objective allowing integration with the future A6 road scheme and wider public interests included.

One of the respondents commented *“The road will be expensive enough and should be redesigned to avoid the contamination.”*

The remaining individuals did not provide further relevant information to support their answer.

### **Disagree**

Of the 8 individuals that responded directly to the consultation question, 1 of them disagreed that they would expect to see the strategic objective allowing integration with the future A6 road scheme and wider public interests included.

The respondent did not provide a reason for their answer.

### **No Response**

Of the 8 individuals that responded directly to the consultation question, 1 of them did not provide a response to this particular question.

## **b. Remediation / Construction Organisations**

### **Agree** (CEF, CDE Group, Keltbray, STS)

Of the 5 remediation / construction organisations that responded directly to the consultation question, 4 of them agreed that they would expect to see the strategic objective allowing integration with the future A6 road scheme and wider public interests included. 2 of the organisations, CDE and STS, provided further technical information on some of the remediation solutions that are more appropriately considered during detailed design.

The remaining organisations did not provide a reason for their answer.

### **Disagree** (ESL)

Of the 5 remediation / construction organisations that responded directly to the consultation question, 1 of them, ESL, disagreed that they would expect to see the strategic objective allowing integration with the future A6 road scheme and wider public interests included. ESL provided the following reason for their answer - *“Road systems and the like do not normally form part of a remediation strategy, unless there is a specific reason for including same.”*

Indaver submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

## **c. Chartered / Professional Bodies**

### **Agree** (QUB, CIWM)

QUB and CIWM NI responded directly to the consultation question and agreed that they would expect to see the strategic objective allowing integration with the future A6 road scheme and wider public interests included.

QUB provided the following reason for their answer, *“I would expect that the Roads service together with the environmental consultants adopt best practice and a circular economy approach around reuse of clean / remediated / recovered materials at the site. e.g. By Best Practice utilising the WRAP guidance “Designing out Waste: a Design team guide for civil engineering” and relevant Quality Protocols on the recovery of aggregates etc. There are also opportunities for some of the proposed remediation designs e.g. the constructed wetlands to also deal with runoff from the proposed A6 scheme (heavy metals / microplastics / tyre rubber / PAHs) rather than discharge to sewer or the nearest water body (River Faughan).”*

CIWM did not provide a reason for their answer.

### **Disagree**

n/a

IBN submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

## **d. Conservation / Environmental Organisations**

### **Agree (UW)**

Of the 2 conservation / environmental organisations that responded directly to the consultation question, only UW agreed that they would expect to see the strategic objective allowing integration with the future A6 road scheme and wider public interests included.

UW did not provide a reason for their answer.

### **Disagree (FOE)**

Of the 2 conservation / environmental organisations that responded directly to the consultation question, only FOE disagreed that they would expect to see the strategic objective allowing integration with the future A6 road scheme and wider public interests included.

FOE provided the following reasons for their answer -

*“Although not strictly part of the risk managing remediation, integration with other projects already in the pipeline is both sensible in terms of allocation of public resources and in terms of avoiding future actions that could compromise the risk management measures (e.g. penetrating any capping layer).”*

*“This stretch of the A6 road proposal has yet to be assessed in the context of significantly altered environmental circumstances and legislative context, where the current road line must be subject to Environmental Impact Assessment, Habitats Regulations Assessment and assessment of its compatibility with the Climate Change Act (Northern Ireland) 2022.”*

*“Consideration of these factors, along with the viability of the new road cannot proceed without a new public inquiry, the outcome of which cannot be predetermined. Therefore, facilitating works for the A6 cannot be a key aim of the Mobuoy Remediation Project.”*

RFA and The Gathering submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

#### **e. Government Departments / Bodies**

##### **Agree**

n/a

##### **Disagree**

n/a

LA submitted a response to the public consultation but did not answer this question directly.

Dfl submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

#### **f. Local Council**

DCSDC submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

#### **g. Other Local Organisations**

##### **Agree**

n/a

##### **Disagree (YMCA)**

Only 1 local organisation responded directly to the consultation question. YMCA disagreed that they would expect to see the strategic objective allowing integration with the future A6 road scheme and wider public interests included.

YMCA provided the following reasons for their answer -

*“Planning the A6 on this route along the river is an environmental disaster of its own, the road is planned to be within 20m of the river as some parts. I strongly object to the road at this location for environmental reasons - the road needs another public enquiry, should be redesigned so that it’s not near the river, should not be going through a flood plain, remove the road from the dump.”*

## Q7: Please provide any additional thoughts, comments, or relevant information to inform the completion of the Remediation Strategy

### Stage 1 - Quantitative Analysis

No Quantitative Analysis for this question.

### Stage 2 - Qualitative Analysis

#### a. Individuals

The following additional and relevant thoughts, comments, or relevant information to help inform the next steps and completion of the Remediation Strategy were received -

*“The Rivers Agency maps show flooding of the site both historically and with Climate Change. Although a flood would flush the area, I think that the Remediation Strategy should include flood defences.”*

*“The simplest, least expensive, most permanent solution is to reroute the Faughan River away from the contaminated site.”*

*“Careful management of ecology is needed to not adversely impact species that have established at the site.”*

*“I really appreciate the big effort that went into the public events in both Eglinton and Derry in order to inform the public about the Remediation Strategy. I am reassured about the ongoing work and feel confident that all objectives will be achieved.”*

#### b. Remediation / Construction Organisations

The following additional and relevant thoughts, comments, or relevant information to help inform the next steps and completion of the Remediation Strategy were received -

STS - *“The importance of having and using the best current technologies to reduce the overall cost of the project would increase the potential successful completion of the project. Northern Ireland has always been in the forefront of new technologies such as PRBs, Treatment Cells, Flushing Reactors, etc all of which have won global acclaim and have been used in many locations across the world.”*

ETS - *“I feel that the Remediation Strategy as it currently stands is too generic to be a credible remediation strategy for implementation. We know from considerable experience of remediating complex and difficult sites that there is a lot of detailed and focused design required to address the pollution risks associated with the site and, most importantly, to deliver best value for money.”*

### **c. Chartered / Professional Bodies**

The following additional and relevant thoughts, comments, or relevant information to help inform the next steps and completion of the Remediation Strategy were received -

QUB - *“Please consider the proximity principal throughout the design process and use locally sourced materials and create jobs for the community. e.g. Consider the use of local biochar in the proposed wetlands, nature-based solutions or as alternative to granular activated carbon in PRBs.”*

### **d. Conservation / Environmental Organisations**

The following additional and relevant thoughts, comments, or relevant information to help inform the next steps and completion of the Remediation Strategy were received -

FOE - *“The extent of remediation - coupled with the challenges such a complex mixture of individual, but not independent, technologies - is not compatible with the findings of the DQRA that “based on several lines of evidence, the overall impact of the Mobuoy Road site on the River Faughan is likely to be low” Yet the DQRA findings are that “when current groundwater quality concentrations are modelled using realistic aquifer parameters, predicted groundwater concentrations for multiple contaminants of concern are likely to exceed their respective environmental screening criteria at the site boundary / the banks of the River Faughan.”*

### **e. Government Departments / Bodies**

No additional information provided.

DfI submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

### **f. Local Council**

DCSDC submitted a response to the public consultation but did not answer this question directly. Their feedback and comments on the draft Remediation Strategy are summarised in Section 8.4.

### **g. Other Local Organisations**

The following additional and relevant thoughts, comments, or relevant information to help inform the next steps and completion of the Remediation Strategy were received -

YMCA - *“Don’t touch the dump, close it off and let it settle for many years to come.”*

## 8.4 Responses that provided comments or views not specifically guided by the consultation questions.

Of the 26 responses to the consultation received, 7 of the responses were not specifically guided by the specific consultation questions. All 7 of the responses were received by email.

Across the 7 responses received, views and comments were received were variable in terms of technical complexity and environmental issues they wished to raise.

Type	Number
Individuals	1 of 9
Remediation / Construction Organisations	1 of 6
Chartered / Professional Body	2 of 3
Conservation / Environmental Organisations	2 of 4
Government Department / Body	1 of 2
Local Council	1 of 1
Local Organisation	0 of 1
<b>Total</b>	<b>8 of 26</b>

Some of the issues raised or comments made during the consultation process extended beyond the scope of the draft Remediation Strategy for the Mobuoy site. In certain instances, these comments also fell outside the remit of DAERA.

### Individuals

1 response was received from an individual which provided thoughts, comments, and relevant information they felt were important to help inform the next steps and completion of the Remediation Strategy.

The response indicated that they were neither supportive nor unsupportive of the strategy.

The response from the individual addressed several important aspects of the draft Remediation Strategy for the Mobuoy site. The topics discussed ranged from the overall scope of the remediation works to the timeline, funding, and the relationship with other local infrastructure projects, specifically the proposed A6 Road Scheme.

Within the scope of the consultation on the draft Remediation Strategy for the Mobuoy site, the individual -

- expressed the view that, alongside the tarry waste sites already identified within the Mobuoy site boundary, other nearby tarry waste sites should also be considered for remediation. This suggestion was made in the context of having an expert team already established, which could efficiently address the remediation of these similar sites in the vicinity.
- recommended that the Northern Ireland Executive should make the funding and delivery of the draft Remediation Strategy a priority. They further highlighted the importance of presenting a clear timeline for delivery, which should include key milestones to ensure transparency and accountability throughout the remediation process.
- recommended that the Northern Ireland Executive should make the funding and delivery of the draft Remediation Strategy a priority. They further highlighted the importance of presenting a clear timeline for delivery, which should include key milestones to ensure transparency and accountability throughout the remediation process.
- raised concerns regarding the interaction between the remediation of the Mobuoy site and the proposed A6 Road Scheme. The individual suggested that the remediation works should take precedence, with appropriate funding and completion secured before any public money is allocated to construction work on the A6 road scheme.

## **Remediation / Construction Organisations**

1 response was received from a remediation / construction organisation (Indaver) which provided thoughts, comments, and relevant information they felt were important to help inform the next steps and completion of the Remediation Strategy.

The response indicated that they were supportive of the strategy.

In their response, Indaver shared information on their recent experiences remediating a complex contaminated site and expressed a willingness to share expertise and support future remediation of the Mobuoy site.

## **Chartered / Professional Bodies**

1 response was received from a chartered / professional body, IBN, which provided thoughts, comments, and relevant information they felt were important to help inform the next steps and completion of the Remediation Strategy.

The response indicated that they were supportive of the strategy.

IBN commended the reference to CL:AIRE's Code of Practice the Definition of Waste: Development Industry Code of Practice (March 2011) and the requirement to develop a detailed

Materials Management Plan in line with CL:AIRE's CoP. IBN recommended that the CoP is followed and applied in its entirety so that all material management and movements are in full compliance with the Waste Framework Directive (Directive 2008/98/EC).

## Conservation / Environmental Organisations

2 responses were received from conservation / environmental organisations, RFA and The Gathering, which provided thoughts, comments, and relevant information they felt were important to help inform the next steps and completion of the Remediation Strategy.

Neither of the responses stated that they were supportive or unsupportive of the strategy. However, based on their feedback and views, both organisations are supportive of the need to remediate the Mobuoy site to protect the environment and public health.

### **Both organisations highlighted the need to remediate the site to protect the River Faughan.**

FA commented, *"The River Faughan at this location is a Special Area of Conservation which would be considered a highly sensitive receptor to be protected under the Habitats Regulation 1995, as amended. However, there is a concern that the ORS sees the Faughan as part of the remediation solution by providing dilution of contaminants that are presently reaching the river at levels above proscribed water quality standards. This would not be an acceptable approach. Rather, whatever remediation strategy is settled on, any discharges to this highly sensitive receptor should be conforming with required water quality standards before being allowed to leave the site."*

The Gathering commented, *"The Faughan is a designated Area of Special Scientific Interest and a Special Area of Conservation. The latter affords the river the highest level of environmental protection in Europe. The Faughan is also the main source of Derry's drinking water supply, which is abstracted 2km downstream of Mobuoy."*

### **Both organisations supported the Mobuoy site being remediated and prioritised over any construction works for the A6 Road Scheme.**

FA commented, *"Given the requirement for new environmental assessments, the Climate Change Act 2022 and the need for a public inquiry, there can be no certainty that this proposed infrastructure project can or will go ahead in the location previously agreed. Therefore, facilitation of the A6 should not be prioritised over the environmental protection of our river and public health."*

The Gathering commented, *"The construction of road infrastructure around the Mobuoy site is the lowest priority and no road should be built until the site is fully remediated and monitored over a reasonable period... Until such times as Mobuoy has been remediated and undergone a robust monitoring programme that establishes how it no longer poses a threat to the River Faughan and public health, the construction of this new road cannot and should not be prioritised."*

**The Gathering supported the remediation of the tarry waste at the Mobuoy site, commenting,** *“There are 2 tarry waste sites in Mobuoy Road, both of which are deemed toxic enough that they will be removed in the remediation of Mobuoy. We fully support the removal of the tarry waste from Mobuoy.”* but raised concerns about other tarry waste sites in the area.

**The RFA highlighted the potential to encounter additional sources of contamination at the site,** over and above what is already known, commenting, *“RFA would stress the importance of being constantly vigilant to the prospect of as yet undetected sources of contamination that may exist at Mobuoy. This is because it cannot be ruled out that other latent sources of contamination may be present on the site.”*

The **RFA raised concerns about the timeframe between the draft Remediation Strategy being completed, in 2023, and the consultation** only commencing 2 years later in June 2025.

The **RFA commented on some of the remedial techniques proposed requiring additional research and testing,** commenting, *“The 2023 report makes mention of other data and research that should be reviewed, when available, to inform the future detailed remediation design. For example, at paragraph 5.8.3 mention is made of an initial phase of ground water contamination monitoring relevant to tarry waste deposition which was due to be completed shortly after the ORS report was completed. However, it is not clear how this additional monitoring information (that was not available at the time of the ORS was drafted) supports the direction being presented by the Department.”*

The **RFA highlighted that the draft Remediation Strategy would benefit from clarity on the proposals for the long-term management of landfill gas,** stating it is *“not clear to RFA is whether the ORS intends to capture these gases to prevent release or simply ensure that they are vented more safely into the atmosphere.”*

The **RFA also highlighted concerns around how resilient the remediation proposals will be to climate-change impacts,** stating *“There is also concern over whether the ORS has been climate-proofed. In August 2017, a severe weather event caused significant flooding in the Faughan Valley. The river burst its banks at Mobuoy and inundated the former Campsie Sand and Gravel lands where wastes are known to be illegally buried. This gives rise to two concerns.*

- 1. The structural stability of the flood barriers at this part of the river and the potential for future flooding of Mobuoy. While there have been no further breaches of the flood defences on the Mobuoy site, there have been at least two further breaches of the levees directly opposite the dump during lesser flood events. This reinforcing RFA's concerns that the riverbanks and flood defences may not be structurally sound to withstand severe weather events which are predicted to become more frequent due to climate breakdown.*
- 2. The potential for flooding of the Mobuoy site before, during and after remediation needs to be properly planned for.”*

The **RFA** also highlighted concerns *“that the ORS sees the Faughan as part of the remediation solution by providing dilution of contaminants that are presently reaching the river at levels above proscribed water quality standards. This would not be an acceptable approach. Rather, whatever remediation strategy is settled on, any discharges to this highly sensitive receptor should be conforming with required water quality standards before being allowed to leave the site.”*

Both organisations provided further feedback and comments on issues that were outside of the scope of this consultation such as costs, timeline, and progress.

## Government Departments / Bodies

1 response was received from a government department / body, DfI Roads, which provided thoughts, comments, and relevant information they felt was important to help inform the next steps and completion of the Remediation Strategy.

Department for Infrastructure (DfI) Roads (Major Projects - North) provided a technical response to the draft Remediation Strategy for the Mobuoy site.

The response from DfI did not explicitly state that they that they were supportive or unsupportive of the strategy. However, the feedback and views received indicate they are supportive of the need to remediate the site in a way that supports the objective of both the A6 Road Scheme and the remediation of the site. To deliver this, DfI Roads highlight that effective collaboration between DAERA and DfI Roads must continue to proactively manage interface areas so that both projects can be delivered efficiently, safely, and in a way that safeguards the environment and supports long-term site use.

In summary, the DfI provided feedback and comments on the following aspects -

- **Remediation Infrastructure Overlap:** DfI noted that several elements of the proposed remediation infrastructure overlap with the A6 boundary. This includes leachate extraction boreholes and surface attenuation ponds. They highlighted potential risks such as construction interference, operational conflicts, and environmental impacts.
- **Mobuoy Road Overbridge:** There is a significant level difference between the proposed upgraded section of Mobuoy Road and the A6 mainline, which could present risks related to structural stability, drainage, flooding, and construction safety.
- **Flooding:** The Mobuoy waste site is located within the River Faughan floodplain, requiring a Flood Risk Assessment (FRA) to ensure that the combined impact of the remediation works and the A6 dualling scheme do not exacerbate flooding.
- **Waste Removal:** The scope for the removal of waste that needs to be removed to accommodate the proposed route of the A6 within the Mobuoy site is not clearly defined.

- **Environmental Assessments:** DfI considered the environmental assessments that have been completed at the Mobuoy site and felt the assessments were heavily focussed on land within the site and that limited assessments had been undertaken on the receiving environment in the wider study area.

## Local Council

1 response was received from a local Council, Derry City and Strabane District Council (DCSDC), which provided views and comments and relevant information they felt was important to help inform the next steps and completion of the Remediation Strategy.

DCSDC provided a technical response to the draft Remediation Strategy for the Mobuoy site. This review also included a review of the processes used to prepare the Remediation Strategy to ensure that the process was robust and completed with full consideration for UK guidance for assessing and remediation contaminated land, Land Contamination Risk Management (LCRM).

The response from DCSDC did not explicitly state that they that they were supportive or unsupportive of the strategy. However, it interpreted that DCSDC are supportive of the need to remediate the site and in the way that has been proposed in the draft Remediation Strategy that was consulted upon, subject to the consideration of comments made with respect to some aspects of the risk assessments, the need for additional detailed design information, and clarity on how the site's future use can be safely accommodated.

In the context of this summary report, comments specific to the draft Remediation Strategy have been summarised below.

**Detailed Design for Engineering Elements** - AECOM provided comment on detailed design for engineering elements and stated that the Remediation Strategy lacks significant detail in the design for engineering elements such as drainage, leachate, and gas management infrastructure. This includes specifics like sizing, volumes, treatment processes, and gas flaring. AECOM also mentioned it was not clear at this stage if the most up to date scheme for the A6 has been accounted for in the design.

**Remedial Targets and Performance Criteria** - AECOM provided a review of the remedial targets and performance criteria within the draft Remediation Strategy and commented that the strategy needs clearly set-out remedial targets, performance criteria, and criteria for validating the remedial action. This includes a detailed validation and verification plan, including a long-term monitoring plan.

**Monitored Natural Attenuation (MNA)** - From AECOMs review of the Draft Remediation Strategy they highlighted key points in regard to the MNA as a remedial option. They state that the strategy should include a detailed plan for MNA, including screening, demonstration, assessment, and implementation phases. MNA principles referenced in DORS but site-specific MNA method, compliance/performance criteria, monitoring method and action plans are deferred to the Implementation Plan rather than included for affected zones (e.g., groundwater downgradient of CIW/CSG).

**Implementation Monitoring and Long-Term Monitoring** - AECOM provided comment on DORS in relation to implementation Monitoring and Long-Term Monitoring. They stated the strategy should outline the performance monitoring requirements, including groundwater monitoring, soil and ground gas sampling, and continuation of the NIEA quarterly monitoring. AECOM also commented that groundwater monitoring objectives set (performance monitoring, continuation of quarterly monitoring, long-term monitoring) but performance criteria and action plans for breaches are not defined for receptors influenced by different zones (e.g., shallow aquifer, River Faughan tributary near lagoon, downstream abstraction).

**Public Exposure and Safety** - AECOM provided comment on the DORS in relation to public exposure and safety and mentions that the strategy should better outline how the proposed remediation addresses safety in the context of the proposed Public Open Space scenario. This includes measures for segregation, engineering controls, and ensuring that the public is not exposed to leachate or other contaminants. They mention that there is insufficient clarity on how the site's future use as Public Open Space will be safely accommodated.

**Verification Plan** - AECOM provided comment on DORS and stated that the strategy should include a verification plan that sets out the methods of verification, performance criteria, lines of evidence, and action plans for addressing any breaches of performance criteria.

**Permitting** - AECOM provided comment on the DORS relevant to permitting, recommending that the requirement for permitting (and statutory approvals) is fully determined as part of the next phases of design development.

## Other Local Organisations

No additional responses were received from other local organisations.

## 9. Consideration of Feedback

The NIEA, and its ICT consultants, have carefully considered all feedback received during the public consultation on the draft Remediation Strategy for the Mobuoy site.

Where respondents provided qualitative responses to the consultation, either by providing reasons for their answers to consultation questions or by providing any other feedback which they felt was important, this information generally fell into 3 broad categories -

- **Within the scope of the Public Consultation** - Information to be considered and potentially used to inform an updated draft Remediation Strategy,
- **Outside the Scope of the Public Consultation, but potentially relevant to later stages of the Mobuoy Remediation Project** - Information to be considered separately from this Public Consultation and potentially used to inform later stages of the project, where appropriate,
- **Outside the scope of the Public Consultation** - Information not considered within this summary report

In response, the NIEA has addressed the points raised, which are within the scope of the Public Consultation, demonstrating that feedback has been carefully considered.

## 9.1 Overview of feedback received from individuals and organisations

Table 9.1 summarises the feedback collected from responses from individuals and organisations. For the purposes of the overview, the comments have been grouped into main themes and responses provided accordingly. The ICT's report has been provided at **Annex B** of this report all comments and feedback were considered and evaluated. The NIEA acknowledges that certain feedback received was beyond the scope of this consultation; however, comments that may be relevant to subsequent phases of the project will be appropriately considered at a future stage.

**Table 9.1**

Feedback / View / Opinion	Response
<b>Types of Waste</b>	
<p>"I find the assumption that all the million tonnes of waste deposited between the road and the river is 'builders' /inert waste. Where would that volume of waste come from? There are numerous reports from fishermen that gas has been emitting from the 'lake' adjacent to the river. Would this be from inert waste?"</p>	<p>Comprehensive ground investigation works have been carried out at the site, comprising 95 trial pits and 140 boreholes, providing detailed information on the types of waste present at the site. Details of all ground investigations carried out at the site are detailed in a Waste Type and Waste Volume Factual Report that has been published on the Mobuoy Remediation Project website (<a href="https://www.daera-ni.gov.uk/publications/mobuoy-remediation-project-waste-type-and-waste-volume-factual-report">https://www.daera-ni.gov.uk/publications/mobuoy-remediation-project-waste-type-and-waste-volume-factual-report</a>)</p>
<p>"I personally think that nobody knows the extent of this dump or what's in it."</p>	<p>Due to a combination of having a detailed information on the main types of waste (and a reasonable estimate of the quantity) and the ongoing operation of the extensive Environmental Monitoring Programme (that monitors groundwater quality), the likelihood of encountering significant additional unknown sources (or types) of contamination is considered low.</p>
<p>"RFA would stress the importance of being constantly vigilant to the prospect of as yet undetected sources of contamination that may exist at Mobuoy. This is because it cannot be ruled out that other latent sources of contamination may be present on the site."</p>	<p>However, due to the scale of the site and volume of waste buried, a degree of uncertainty will remain. The comprehensive site investigations undertaken have been</p>

Feedback / View / Opinion	Response
	<p>carried out to minimise this risk as much as is reasonably possible. 'Hot Spot Removal' protocols will be in place for the duration of the works. This process involves the excavation and removal of unexpectedly encountered waste, which will be processed and segregated within the CIW yard. Materials suitable for reuse on site will be utilised for restoration, while those that do not meet reuse criteria will be disposed of or recycled offsite. <b>NIEA notes that whilst this information has been provided for certain 'waste zones' in the draft Remediation Strategy, clarification that the 'Hot Spot Removal' protocols are proposed all of the waste zones on the site will be provided in the updated draft Remediation Strategy.</b></p>
<b>Viability/Feasibility of Remedial Solutions Proposed</b>	
<p>"The proposed solutions are extremely expensive, complex, unproven, maybe not capable of being implemented, may take too long to implement before contamination happens, and may eventually fail over time.</p>	<p>Various waste types, high volumes, and an environmentally sensitive area create a complex issue that demands a technical solution for long-term environmental protection.</p> <p>DAERA's approach to developing the draft Remediation Strategy aligns with the National Level guidance that applies in Northern Ireland - Land Contamination Risk Management (LCRM). These procedures provide a structured framework for making decisions in the assessment and management of contaminated sites such as the Mobuoy waste site. These procedures can be read in full at: <a href="#">Land contamination risk management (LCRM)   gov.uk</a>.</p>
<p>"It's my opinion that it would be better left alone and let nature take over."</p>	
<p>One of the respondents highlighted concerns about the proposal to leave waste in the ground, particularly close to waterways. that surface water management should also be included as a strategic objective.</p>	<p>A sustainable approach to remediation is being taken and LCRM signposts assessors to further detailed guidance on a sustainable approach - <a href="#">SuRF-UK</a> (Sustainable Remediation Forum UK - an initiative set up to progress the UK understanding of sustainable remediation and sustainable land management) on the <a href="#">CL:AIRE</a> (Contaminated Land: Applications in Real Environments) website.</p>

Feedback / View / Opinion	Response
<p>“The proposed solutions are extremely expensive, complex, unproven, maybe not capable of being implemented, may take too long to implement before contamination happens, and may eventually fail over time.”</p>	<p>Remediation experts within the Integrated Consultancy Team carried out a review of a range of potential remediation options that could be used to address the risks to the environment from the Mobuoy site. The selection initially started with a review of a long list of potential remediation options, and from that list, a short list of technically viable options was carried forward for a more detailed assessment.</p>
<p>“It is essential that zones 5 to 9 are fully remediated to prevent impacts on the River Faughan Special Area of Conservation. These zones are adjacent to the River Faughan.”</p>	<p>The shortlisted potential remediation options were assessed and scored against environmental, social, and economic criteria. Following this assessment, the highest scoring options were selected as the recommended remediation options for the site. The selected final recommended remediation options are not the only options for the site but are considered to be the most technically effective and sustainable remediation options for the site when compared with other options.</p>
<p>“I personally think that nobody knows the extent of this dump or what’s in it. There is a risk that remediation works could mobilise contamination.”</p>	<p>The NIEA recognises that the draft Remediation Strategy document that was consulted on was a ‘concept’ and not at the detailed design stage required to fully evaluate the likelihood of the remedial solutions being effective at remediating the site in the short, medium, and long term. However, the specialist consultants have based their assessment of potential remedial solutions using their expertise and experience of the remedial solutions and other contaminated sites to form an expert opinion on the suitability of the remedial solutions proposed.</p>
<p>“The 2023 report makes mention of other data and research that should be reviewed, when available, to inform the future detailed remediation design. For example, at paragraph 5.8.3 mention is made of an initial phase of ground water contamination monitoring relevant to tarry waste deposition which was due to be completed shortly after the ORS report was completed. However, it is not clear how this additional monitoring information (that was not available at the time of the ORS was drafted) supports the direction being presented by the Department.”</p>	<p>The details of the Integrated Consultancy Teams remediation options identification and evaluation process and results are presented in the Remediation Options Appraisal report.</p> <p>The NIEA notes that the updated <a href="#">Remediation Strategy</a> will benefit from including additional detail on measures that will be in place to -</p>

Feedback / View / Opinion	Response
<p>Concerns about the timeframe between the draft Remediation Strategy being completed, in 2023, and the consultation only commencing 2 years later in June 2025.</p>	<p><b>1. Protect the environment during remediation construction works,</b></p> <p><b>2. Monitor the performance of the remedial solutions implemented to make sure they are working, in line with the detailed design, in the short, medium, and long term, and,</b></p> <p><b>3. Demonstrate that the site has been successfully remediated - Validation.</b></p> <p><b>The NIEA acknowledges that the draft Remediation Strategy was developed in 2023 but not consulted on until 2025. Since then, additional monitoring has been carried out to support Monitored Natural Attenuation and additional research has been carried out to support the suitability of short rotation coppice willow and biologically active capping in some parts of the site. During the updating of the draft Remediation Strategy document, any additional relevant information will be considered and included.</b></p>
<p><b>Remediation Objectives</b></p>	
<p>“Objective no. 2 as it is stated in the consultation document, “The Faughan groundwater body has been polluted from wastes deposited at the Mobuoy site. This resulted in the reclassification of the Faughan Groundwater body from ‘good’ to ‘poor’ status in 2021 under The European Water Framework Directive (2000/60/EC) (WFD). CIWM NI would welcome Objective no. 2 being revised to refer to sources other than the (relatively recently) deposited wastes.”</p>	<p>The draft Remediation Strategy presented proposes measures to specifically address the risk of contamination from sources of contamination within the Mobuoy site. As such, this remains the primary focus of the remediation objective at this stage.</p>

Feedback / View / Opinion	Response
<p>“Objective no. 4 in the context of the most recent published landfill gas risk assessment that finds ‘perceived low risk via potential off-site lateral migration is low’. The acceptability of the ‘low risk’ in the context of remediation being required, or not, has not been made clear in the referenced report and CIWM Northern Ireland suggests this ambiguity should be clarified.”</p>	<p>The published landfill gas risk assessment is an assessment of impacts from landfill gas on human health, Although this assessment considers the risk to human health to be ‘low’, the Department considers the uncontrolled release of landfill gas to be an unacceptable approach to managing landfill gas to protect the environment and the health of future site users.</p> <p><b>The NIEA notes that further assessments of landfill gas will be required to inform landfill gas management design and ensure the detailed design aligns with any planned future use of the site.</b></p>
<p>“The objectives are both too vague and not necessarily likely to result in the necessary management of risk.”</p>	<p>During the detailed design phase, specific remedial targets will be established that are precise, measurable, achievable, realistic, and time bound.</p>
<p><b>Alternative Remediation Methods Proposed</b></p>	
<p>“Reroute the river to protect it.”</p>	<p>Re-routing the River Faughan to “protect it” was not a long list option that was short listed for detailed assessment. The River Faughan is a locally and internationally significant water course, not only for public water supply abstraction, but also for ecology and wildlife that depend on it. Due to the ecological significance of the River Faughan, it is protected by its designation as an Area of Special Scientific Interest (ASSI) and a Special Area of Conservation (SAC).</p>
<p>“To safeguard the public permanently NI Water should be made build an intake upstream of the dump.”</p>	<p>The central principle of Sustainable Remediation, the approach taken by the Department, is “the benefit of undertaking remediation is greater than its impact.” Due to anticipated adverse environmental impacts of the engineering works that would be required to re-route the River Faughan, or remove all of the waste, these options did not score favourably against other potential options considered in the <a href="#">Remediation Options Appraisal</a>.</p>
<p>“Remove all of the waste.”</p>	<p>Due to anticipated adverse environmental impacts of the engineering works that would be required to re-route the River Faughan, or remove all of the waste, these options did not score favourably against other potential options considered in the <a href="#">Remediation Options Appraisal</a>.</p>

Feedback / View / Opinion	Response
	<p>Northern Ireland Water explored moving the public drinking water abstraction point from downstream to upstream of the Mobuoy site to protect water quality. However, a technical feasibility study found this solution was not viable. Meeting the necessary demand for public drinking water would lower the water levels or discharge in the River Faughan upstream, potentially harming habitats and wildlife that rely on the river's ecosystem.</p>
<p><b>Current level of detail in the draft Strategy</b></p>	
<p>“the draft strategy in its current state does not allow for an effective technical appraisal of the favoured options nor does it contain enough synthesised information that would allow a remediation contractor to effectively design and cost such a project.”</p>	<p>The draft Remediation Strategy document presented is a ‘concept’ and an important step towards agreeing a Remediation Strategy for the site that can be implemented in practice. Subsequent steps in the LCRM process will provide the design detail required to further evaluate the likelihood of the remedial solutions being effective at remediating the site in the short, medium, and long term.</p>
<p>“I feel that the Remediation Strategy as it currently stands is too generic to be a credible remediation strategy for implementation. We know from considerable experience of remediating complex and difficult sites that there is a lot of detailed and focused design required to address the pollution risks associated with the site and, most importantly, to deliver best value for money.”</p>	

Feedback / View / Opinion	Response
<b>Consultation Questions</b>	
<p>“the question is poorly phrased as it suggests that there is a (singular) “right” remediation strategy. It would have been better phrased as asking if the draft Remediation Strategy is a “reasonable” way to remediate the Mobuoy site.”</p>	<p>NIEA recognise that there is no singular way to remediate a contaminated site, such as Mobuoy.</p> <p>In the context of the Public Consultation on the draft Remediation Strategy for the Mobuoy site, Question 1: Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? refers to the proposal presented in the draft Remediation Strategy.</p>

## 9.2 Overview of technical feedback received from Derry City and Strabane District Council (DCSDC)

Table 9.2 below presents an overview of the feedback received from the substantial and technical response from DCSDC. For the purposes of the overview, the comments have been grouped into main themes and responses provided accordingly. The ICT's report has been provided at **Annex C** of this report, and all comments and feedback were considered and evaluated. The NIEA acknowledges that certain feedback received was beyond the scope of this consultation; however, comments that may be relevant to subsequent phases of the project will be appropriately considered at a future stage.

Table 9.2

Feedback / View / Opinion	Response
<b>Detailed Design for Engineering Elements</b>	
<p>The Remediation Strategy lacks significant detail in the design for engineering elements such as drainage, leachate, and gas management infrastructure. This includes specifics like sizing, volumes, treatment processes, and gas flaring.</p>	<p>The draft Remediation Strategy document presented is a 'concept' and an important step towards agreeing a Remediation Strategy for the site that can be implemented in practice. Subsequent steps in the LCRM process will provide the design detail required to further evaluate engineering elements such as drainage, leachate, and gas management infrastructure. This includes specifics like sizing, volumes, treatment processes, and gas flaring.</p>
<b>Remedial Targets and Performance Criteria</b>	
<p>The strategy needs clearly set-out remedial targets, performance criteria, and criteria for validating the remedial action. This includes a detailed validation and verification plan, including a long-term monitoring plan.</p>	<p><b>The NIEA notes the point raised and will consider during future design phases of the Remediation Strategy.</b></p>

Feedback / View / Opinion	Response
<b>Monitored Natural Attenuation (MNA)</b>	
<p>The strategy should include a detailed plan for MNA, including screening, demonstration, assessment, and implementation phases. MNA principles referenced in DORS but site-specific MNA method, compliance/performance criteria, monitoring method and action plans are deferred to the Implementation Plan rather than included for affected zones (e.g., groundwater downgradient of CIW/CSG).</p>	<p><b>The NIEA notes the point raised and can confirm that detailed investigations have been ongoing to determine the suitability of MNA as part of the remedial solution for the site. The results of the detailed investigation will be available to inform the refined draft Remediation Strategy.</b></p>
<p>“The objectives are both too vague and not necessarily likely to result in the necessary management of risk.”</p>	
<b>Implementation Monitoring and Long-Term Monitoring</b>	
<p>The strategy should outline the performance monitoring requirements, including groundwater monitoring, soil and ground gas sampling, and continuation of the NIEA quarterly monitoring.</p>	<p><b>The NIEA notes the point raised and will consider during future design phases of the Remediation Strategy.</b></p>
<b>Public Exposure and Safety</b>	
<p>The strategy should better outline how the proposed remediation addresses safety in the context of the proposed Public Open Space scenario. This includes measures for segregation, engineering controls, and ensuring that the public is not exposed to leachate or other contaminants.</p>	<p><b>The NIEA notes the point raised and will consider during future design phases of the Remediation Strategy.</b></p>

Feedback / View / Opinion	Response
<b>Verification Plan</b>	
<p>the strategy should include a verification plan that sets out the methods of verification, performance criteria, lines of evidence, and action plans for addressing any breaches of performance criteria.</p>	<p><b>The NIEA notes the point raised and will consider during future design phases of the Remediation Strategy.</b></p>
<b>Permitting</b>	
<p>It is recommended that the requirement for permitting (and statutory approvals) is fully determined as part of the next phases of design development.</p>	<p>The NIEA recognises that the draft Remediation Strategy document that was consulted on was a 'concept'. Licensing and permitting requirements will be ascertained once detailed designs and specifications are available, therefore, licensing and permitting will be considered during future design phases. However, permitting and licensing has been considered in the context of 'achievability' of proposed remedial solutions during the Remediation Options Appraisal process.</p>

## 9.3 Overview of technical feedback received from the Department from Dfl Roads

Table 9.3 below presents an overview of the feedback received from the substantial and technical response from Dfl Roads. For the purposes of the overview, the comments have been grouped into main themes and responses provided accordingly. The ICT consultant's report has been provided at Annex D of this report, and all comments and feedback were considered and evaluated. The NIEA acknowledges that certain feedback received was beyond the scope of this consultation; however, comments that may be relevant to subsequent phases of the project will be appropriately considered at a future stage.

Table 9.3

Feedback / View / Opinion	Response
<b>Detailed Design for Engineering Elements</b>	
<p>Several elements of the proposed remediation infrastructure (leachate extraction boreholes and surface attenuation ponds) are located within Dfl's draft vesting boundary. Perceived potential risks to include:</p> <ul style="list-style-type: none"> <li>• Construction interference, where overlapping works could delay or complicate programme delivery.</li> <li>• Operational conflicts, particularly in maintaining access to leachate or surface water management infrastructure once the road scheme is constructed / operational.</li> </ul>	<p><b>The NIEA notes these points, and they will be addressed through ongoing collaboration and scoping exercises.</b></p> <p>Consideration will be given to the placement of remediation infrastructure relative to the draft vesting boundary.</p> <p>Other engineering considerations, such as the Mobuoy Road overbridge, will also be dealt with through ongoing collaboration and scoping exercises.</p>

Feedback / View / Opinion	Response
<ul style="list-style-type: none"> <li>Environmental impacts, such as inadvertent disruption to drainage patterns or water quality management if features are not properly coordinated.</li> </ul>	
<p>Other engineering considerations (Mobuoy Road overbridge, permanent and temporary drainage schemes, waste removal from proposed mainline route, site access, and site masterplan).</p>	
<b>Flooding</b>	
<p>The Mobuoy waste site is situated in the River Faughan floodplain, therefore requires a Flood Risk Assessment (FRA) to be carried out in accordance with Planning Policy Statement (PPS)15.</p>	<p><b>The NIEA notes that during the period of time between the draft Remediation Strategy was authored and then consulted on that the existing FRA became outdated.</b> In response to this, an updated FRA has been commissioned and will be carried out in accordance with PPS15.</p>
<b>Environmental Assessments</b>	
<p>The level of ecological 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.</p>	<p><b>The NIEA notes the comment and recognises that further ecological assessment is required at the appropriate time.</b></p> <p>The draft Remediation Strategy document presented is a 'concept' and an important step towards agreeing a Remediation Strategy for the site that can be implemented in practice. Subsequent steps in the LCRM process will provide the design detail required to scope detailed ecological assessments. Detailed ecological assessments will be required to inform an Environmental Impact Assessment (EIA) for the project.</p> <p>The protection of wildlife and ecology on the Mobuoy site is an important aspect of the Mobuoy Remediation Project. To date, NIEA have completed, and updated, Preliminary</p>

Feedback / View / Opinion	Response
	<p>Ecological Assessments and specialist surveys for bats, newts, badgers, otters, and non-native invasive species. These surveys have provided important ecological baseline information for the site as well as protecting ecology and wildlife present on the site from NIEA investigation and monitoring activities. Ecological assessment reports completed for the site are available to download from the <a href="#">DAERA website</a>.</p>

## 10. Next Steps

Post consultation, the next step is for NIEA to incorporate relevant feedback received during the consultation, make any necessary updates or amendments to the draft Remediation Strategy, and deliver a recommended remediation strategy to the DAERA Minister for consideration and progression to the next stages of scrutiny and approval.

NIEA's review and assessment of the responses has not indicated a need for fundamental changes to the appraisal of remediation techniques set out in the draft strategy and accordingly the recommended remediation techniques remain as presented. However, responses have highlighted areas where it will be helpful and beneficial for NIEA to clarify and refine some details which will strengthen the draft Remediation Strategy.

The timeframe for remediation is outside the scope of this consultation; however, it is important to recognise that remediation is likely to take a number of years to complete.

Any implementation plan and timetable for remediation will be subject to:

- i. Minister's consideration of the refined strategy, and subsequent Executive approval.
- ii. Wider consideration of DAERA/NIEA's statutory responsibility to protect water quality;  
and
- iii. Affordability in the context of the incredibly challenging constraints of public finances.

It is important to note that affordability may require the consideration, prioritisation, and phasing of key elements of any remediation works. Within the technical assessment presented in the Consultation, the site has been broken down into zones and the risk associated with each zone varies depending on the waste contained in each zone. As seen in both the Consultation document and the responses received, this provides a potential opportunity for the consideration of which areas to address first, and it provides flexibility in the roll-out of solutions to address the highest risk areas on the site.

A refined strategy will be developed along with an updated cost estimate for its delivery. The DAERA Minister will carefully consider DAERA's statutory duties in protecting water quality, and the wider role of the Executive and Assembly in the scrutiny and affordability of appropriate next steps.



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