

## Brief Critique of Best Available Technologies for LWS and the Draft R&P

- The rejection by the consultants of the DeepShaft system is somewhat perfunctory. A cost benefit analysis should be undertaken to properly take into account the noted advantages of such a system.  
Land is in short supply in Jersey and should not be squandered.  
The placement of Sewerage Works close to residential areas poses many environmental negatives the DeepShaft system has the potential to overcome these.  
The footprint of the DeepShaft system is significantly smaller than the conventional plant and would allow for cheaper and more practical odour control.  
The process itself is more efficient albeit with stronger influent which will arise as SUDS and water saving schemes develop.  
The process could also be coupled with ethanol production to provide a revenue stream to offset costs and to substitute fuel imports.  
The addition of tertiary treatment might be also required for conventional plant.  
It is suggested that the cost of drilling a vertical shaft is high but no cost estimates/examples are given.  
Over 80 units are quoted as existing but only Southport UK is considered.  
Extra holding units for overflow storm waters could also be constructed using this method at other sites.
- Overall the draft report & proposition does not make enough mention in 8.0 Future waste water minimisation initiatives of the potential flow reduction arguments and the timescale acceleration that could easily be encouraged to deliver this.
- Is this a 20 year strategy or a longer period? In either case the sustainability issues must be better defined as a proper part of the strategy and not just an afterthought.
- It is not clear just how much sewage is produced/delivered to the stw/sea and the environmental/financial sense of adding sewage to less soiled waters to bulk up flows for central treatment or disposal.
- Assumptions for DWF are based on 150L/capita and future water usage estimates could be much lower as "wise use of resources" sets in.
- No green paper?
- Climate effects must be better assessed, sedimentation, erratic weather, new seasonality
- The LWS represents a challenge to the strategic planning framework initiative in that from work undertaken so far there doesn't appear to have been much joined up ministerial activity to ensure that the decision making takes place in the sustainable development intersection of the three main sectors of government interest.

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