

Enquiries Peter Smith
Our Ref 3207880
Head Office
Your Ref SSI-10034

6 November 2019

Department of Planning, Industry & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sirs

RE: Submission – Snowy 2.0 Segment Factory (SSI-10034)

Thank you for the opportunity to provide comment in relation to the Snowy 2.0 Segment Factory. Snowy Monaro Regional Council (SMRC) strongly supports the Snowy 2.0 project and acknowledges the efforts made by Snowy Hydro Limited (SHL) to engage with Council during the formative stages of both the Main Works and the Segment Factory projects in order to identify issues of potential concern and possible mitigation measures.

SMRC also wishes to acknowledge the efforts made by SHL to ensure that local communities receive benefits from the proposal, and particularly for those communities likely to be more affected by some of the project's impacts. The Segment Factory proposal is one such benefit.

SMRC wishes to provide the following comments:

Doc Ref	Comment	Submission
Appendix K - Contamination assessment	The house was unoccupied but noted to contain a large amount of furniture, boxes, cables, etc. The roof of the house comprised fibre cement sheeting and is likely to contain asbestos. Scattered ACM fragments.	SMRC's waste facilities have limited capacity due to licensing requirements to accept asbestos waste. SMRC may accept small quantities up to approximately five tonnes at a time with prior notification. While it is unlikely that excessive quantities of ACM will be encountered in the Segment Factory project, SMRC may require an alternative facility to be used. SMRC is happy to discuss asbestos disposal requirements with SHL before commencement of the project.
Appendix L - Land and soils assessment pg 34	The Land and Soil Assessment identifies that the topsoil is heavily infested with African Lovegrass and holds a significant seedbank.	The north western vehicular route from the segment factory to the main works sites within KNP and Tantangara is an area considered to be comparatively clear of African Lovegrass and contains some areas of highly productive agricultural land. SMRC supports the proposal to install a vehicle washdown area at the factory site. This will assist greatly in managing potential spread of noxious weeds along the transport route.

Interallotment drainage easement	<p>The segment factory site currently receives natural overland flow from the adjoining sites fronting Polo Flat Road. These sites do not possess an easement to drain stormwater to drainage channel within the segment factory site, and as such can only legally dispose of stormwater on site or pump back up to Polo Flat Road. Both these options are a constraint on industrial development on these sites.</p> <p>The redevelopment of the segment factory site presents an opportunity to rectify this issue for the benefit of future development in this southern section of Polo Flat. It is noted that SMRC already has wastewater infrastructure located along this boundary. It is requested that a 3m wide interallotment stormwater easement in favour of SMRC be created along the entire length of the western boundary of the segment factory site and along the natural drainage channel crossing this site until the point where this channel exits the site.</p> <p>SMRC would be happy to investigate and negotiate this matter on a collaborative basis with SHL, if this is not included in the project determination.</p>
General comments	<ol style="list-style-type: none"> 1. Proposals to upgrade specified intersections, as also outlined in the Main Works EIS, are supported. SMRC supports the proposal to lower the speed limit on Polo Flat Road to 60km/h. 2. Although not included as part of the project or subject to the EIS considerations, the potential to use Bobeyan Road/Shannons Flat Road as a possible alternate return route for heavy vehicles has been discussed at length with SHL and RMS. This is still viewed as viable, and subject to physical improvements in some locations, will assist in mitigating the effects of the number of heavy vehicle movements through the centre of Cooma. SMRC will continue to work closely with RMS, SHL and their partners on this aspect. 3. Rather than the segment factory premises being decommissioned, SMRC is eager to work with SHL/FGJV to investigate suitable ongoing use of the premises and site following completion of the project. Achieving a beneficial alternative use for the premises and site following completion of the project would present a far better return on capital outlay. 4. A water supply network analysis was done for the whole of Cooma and has addressed the segment plant requirements. No issues have been identified with the current supply meeting the needs of the batching plant. It should be noted however, that in drought conditions, residential customers get priority over non-residential customers in regard to supply of potable water. This can be clarified through a suitable service level agreement between SMRC and FGJV. 5. No details were provided regarding the possibility of recycling failed concrete segments and re-use of cementitious fines from the concrete manufacturing process. SMRC would encourage this to be considered as part of an overall waste management strategy for the project.

The proposed Segment Factory project represents a remarkable opportunity for the SMRC region to obtain a real and tangible benefit from the Snowy 2.0 project, with increased employment opportunities, and the potential for beneficial secondary uses of the site and premises following the Snowy 2.0 project completion.

Subject to appropriate measures to ameliorate any environmental or operational impacts, this project should be supported.

Council would welcome the opportunity to discuss any of the items included in this submission.

Yours faithfully



Peter Bascomb
General Manager