

Our Reference: 2329616 KA:SR
Your Reference:
Contact Name: Kate Alberry

Rose-Anne Hawkeswood
NSW Department of Planning & Environment
Locked Bag 5022
Parramatta NSW 2124

Monday, 1 December 2025

Re: Narrabri Lateral Pipeline (SSI-53307723) - Comments on the Environmental Impact Statement (EIS)

Dear Ms Hawkeswood,

Thank you for the opportunity to make a submission in response to the EIS for State Significant Infrastructure (SSI-53307723) for the Narrabri Lateral Pipeline project.

It is understood that the development will involve:

The Project – constructing, operating (including maintain) and decommissioning an underground gas transmission pipeline about 55 kilometres in length, along with associated surface infrastructure, to connect the approved Narrabri Gas Project (2020) to the approved Hunter Gas Pipeline (Santos acquired the Hunter Gas Pipeline in August 2022). The project will allow the transmission of all natural gas produced by the Narrabri Gas Project to the existing NSW natural gas transmission network near Newcastle via the Hunter Gas Pipeline for the east coast domestic gas market. Santos has committed that all gas from the Narrabri Gas Project will be made available to the east coast domestic gas market.

As critical State significant infrastructure, the project is subject to approval by the Minister for Planning and Public Spaces under Part 5, Division 5.2 of the Environmental Planning and Assessment Act 1979 (NSW). The project is also a controlled action under the Environment Protection and Biodiversity Conservation Act 1999 (Cth) and requires approval from the Australian Minister for the Environment and Water.

The project is located in the Narrabri Shire local government area within the traditional Country of the Kamilaroi (Gamilaraay, Gomeroi) People. The project extends between the approved Narrabri Gas Project gas processing facility at Leewood (20km south-west of Narrabri) traverses south-east via the Narrabri Gas Project Bibblewindi facility and ends at a tie into the approved Hunter Gas Pipeline (located about 5.5km south-east of Baan Baa).

Whilst Council generally supports the project and acknowledges the ongoing economic benefit to the local area and the State, Council wishes to raise the following matters for consideration:

1. Voluntary Planning Agreement/contributions

Council welcomes discussions on the preparation of a voluntary planning agreement and or contributions for this proposal. Council would assume that this would form part of any conditions of consent.



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2. Heritage

The Report by OzArk has identified 39 AHIM recorded sites, 15 unrecorded Aboriginal sites and 2 of which were associated with potential archaeological deposits (PAD). Additionally, 2 previously recorded Aboriginal sites were found to extend beyond their previously recorded limits and were confirmed to be located within the study area. It has been concluded that 6 Aboriginal sites within the study area will be impacted by the project – 19-6-0310 (NLP IF-7, 20-4-1193 (NLP IF-11), 19-6-0294 (NLP OS-1), 19-6-0260 (Nindethana AS4), 19-6-02362 (Nindethana As6), and 19-6-0271 (Nindethana IA7).

OzArk has indicated that the project has been located to minimise impacts on known Aboriginal cultural heritage sites. It is anticipated that construction would directly impact 2 sites and part of 4 Aboriginal sites. It is noted that further opportunities to avoid or minimise impacts on Aboriginal cultural heritage will be considered during ongoing design and construction planning. Furthermore, this would include continuing to refine the design and construction planning to minimise and avoid direct impacts on Aboriginal sites as far as reasonably practicable, salvage and implementing an Aboriginal cultural heritage management plan.

The EIS and supporting documentation indicate that Santos has consulted and will continue to consult with relevant Aboriginal stakeholders including Registered Aboriginal Parties.

Council agrees with the comments received by Santos during the stakeholder engagement and recommend changes to the Recommended Management and Mitigation Measures to include the comments received by First Nations people and organisations to date and the Mitigation Measures should include but are not limited to the following:

- It is recommended that further consultation be undertaken to address the concerns of the First Nations people.
- It is recommended that further field survey, in consultation with the First Nations People, should be undertaken to cover the 1km length of the proposed pipeline corridor not yet surveyed.
- It is recommended that site walk overs be conducted to assess cultural heritage and other values which will be impacted by the project.
- The Aboriginal Heritage sites identified both in and around the construction should be identified in the CMP and should be physically fenced off before construction commences, in consultation with First Nations People.
- Cultural heritage induction and awareness training should be undertaken in partnership with appropriately qualified Local Aboriginal Land Council (LALC) or First Nations representatives of the relevant Country, rather than being delivered primarily by OzArk staff.
- Additionally, site monitors should be employed from the relevant LALC and/or First Nations people. The site monitors should be present for all groundwork for the project including in the areas surrounding the identified sites both registered AHIMS and not registered.

- The study addresses the physical nature of the sites but not the cultural values and the connection to country by First Nations People. This study should be undertaken as a matter of priority.
- It is noted that cultural values cannot be imposed from one study area to another as identified by OzArk.
- Subsurface investigation of the Aboriginal sites impacted by the project should be grader scraped as required and/or requested by the RAP's, Ntscorps and other First Nation people.
- It is noted that the recommendations by Ntscorp (Gomeroi Applicant) have not been included in the recommendations by OzArk. Including: the native title claims process and ongoing access to country during and after the project, cultural awareness training, questions in relation to the reliance on AHIMS, the need for gender balanced cultural surveys, rehabilitation of the site, and immediate and ongoing cultural heritage management and protection.
- Council notes that comments by OzArk provided as a response to concerns raised by First Nations People, 'not relevant at this stage' as being dismissive and indicates that OzArk and Santos may not be taking the concerns raised by First Nations people seriously. It is absolutely appropriate at this stage to build the points raised by First Nations people into the EIS for future consideration and action.

3. Traffic and Transport

Council supports the development of a detailed trip and route planning which is proposed to be conducted during the construction planning process. And any future discussions around the proposed upgrade to the intersection of the Kamilaroi Highway and the Baan Baa compound access would be required. Additionally, any works on Council roads will require consultation with Narrabri Shire Council (NSC).

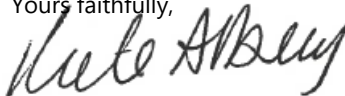
4. Biodiversity

- The biodiversity impact of the proposed development should be considered carefully. The Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) confirmed the project to be a controlled action in 2025, to be assessed under the bilateral agreement with NSW due to the potential for significant impacts on the matters protected under the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* namely listed threatened species and communities.
- Biodiversity offset requirements under the BC Act has been determined using the BAM Calculator. A total of up to 3,871 ecosystem credits are estimated to require to offset the projects impact on native vegetation. This would also offset impacts on habitat for ecosystem-credit threatened fauna species. A total of up to 36,317 species credits are estimated to be required to offset the project's impact on species credit species.
- It is noted the there is concern that the presence of a permanent easement could affect movement of some fauna species and result in habitat fragmentation. To address this a fauna connectivity strategy will be developed and implemented.
- NSC would be interested to understand what this development will use to acquit the offset liability of this project.

- It is also noted that in Chapter 6 – Biodiversity - on page 6.26 there is an error or an unfinished sentence, 'The disturbance footprint is known or assumed to support 27 species-credit species as detailed in with...'.

If you have any questions or require clarification please contact Kate Alberry, Council Director Development and Compliance on 02 6799 6866 or council@narrabri.nsw.gov.au.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Kate Alberry', written in a cursive style.

Kate Alberry

Director | Development and Compliance