



## NSW National Parks and Wildlife Service

Your ref: SSI-70279722  
Our ref: DOC25/810499

Ms Erin Matarazzo  
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By email: [erin.matarazzo@dpie.nsw.gov.au](mailto:erin.matarazzo@dpie.nsw.gov.au)

Dear Ms Matarazzo

Thank you for your referral via the Major Projects Portal regarding the proposed State Significant Infrastructure of the **Mount Piper to Wallerawang Transmission Line** (SSI-70279722). NPWS acknowledges that the project is declared Critical State Significant Infrastructure (CSSI) under Division 5.2 of the *NSW Environmental Planning and Assessment Act 1979* (EP&A Act).

The NSW National Parks and Wildlife Service (NPWS) appreciates the opportunity to provide advice on this proposal, as it directly affects land reserved under the *NSW National Parks and Wildlife Act 1974* (NPW Act) as Gardens of Stone State Conservation Area (referred to as 'park' in this letter). The works in the park include:

- widening of the existing 132 kV (Line 94E) corridor from 45 m to 60 m
- upgrades and widening of the vehicle trail along Line 94E and minor upgrades to access trails elsewhere in the park
- construction of 8 new double circuit transmission steel towers up to 60 metres tall to allow the installation of the new 330 kV transmission line.

NPWS confirms it is satisfied with Transgrid's consultation to date. We have been consulted during the project's development since 2022, and are fully supportive of the preferred route option as it maximises the use of the existing clearing through the park and, as such, has the lowest impact on its natural and cultural values.

On review of the Environmental Impact Statement and supporting documents, NPWS provides the following recommendations:

1. Disturbance of purple copper butterfly habitat to be avoided as much as possible, both during the line's construction and operation.
2. Conditions of consent to identify that works within the park are subject to NPWS authorisation.
3. A formal creek crossing to be constructed as part of the trail upgrades over the third-order stream between towers 21D and 22D.
4. The Construction Environmental Management Plan to be developed in consultation with NPWS.
5. At completion of construction works, the access trail network to be consistent with the Gardens of Stone State Conservation Area Vehicle Access Strategy (NPWS-DCCEEW 2024).
6. NPWS to be consulted in development of the Biodiversity Offset Strategy.

Further detail and justification of each of these recommendations is included in **Attachment A**.

If you have any further questions about this issue, please contact Angela Lonergan, Manager Kanangra Area at [angela.lonergan@environment.nsw.gov.au](mailto:angela.lonergan@environment.nsw.gov.au)

Yours sincerely

*D Crust*

David Crust  
**Director Park Operations, Blue Mountains**  
**National Parks and Wildlife Service**

25 September 2025

## NPWS detailed advice on the Environmental Impact Statement for the Mount Piper to Wallerawang Transmission Line (SSI-70279722).

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In preparing this advice, NPWS has reviewed the following documents:

- Mount Piper to Wallerawang Transmission Line Upgrade Project Environmental Impact Statement, dated August 2025
- Technical Report 1 – Water Impact Assessment, prepared by GHD Pty Ltd for Transgrid, dated 19 August 2025
- Technical Report 2 – Biodiversity Development Assessment Report, prepared by GHD Pty Ltd for Transgrid, dated 21 August 2025
- Technical Report 4 – Land Use and Agriculture Assessment, prepared by GHD Pty Ltd for Transgrid, dated 18 August 2025
- Technical Report 5 – Aboriginal Cultural Heritage Assessment Report, prepared by OzArk Environment & Heritage for GHD on behalf of Transgrid, dated 19 August 2025

### 1. Protection of Purple Copper Butterfly (also known as Bathurst Copper Butterfly)

Technical Report 2 – Biodiversity Development Assessment Report (BDAR) outlines the survey effort for the Purple Copper Butterfly (*Paralucia spinifera*) several times. It is assumed that the dates in Table 2.3 of the BDAR are correct and that these surveys occurred in October 2023, soon after the preliminary investigations of suitable habitat in August 2023. In contrast, the description of targeted surveys in the BDAR's section 2.6.4 (p.30) states that the surveys for the butterfly were conducted in October 2024. As all other references to the survey mention October 2023, it is assumed the reference to October 2024 is wrong, and that surveys were carried out in only one season.

This appears to be a very limited survey effort for the butterfly, and is considered insufficient to conclude that the proposal will not impact on this species.

The BDAR identifies that the essential habitat for the butterfly, namely *Bursaria spinosa subsp. lasiophylla*, is present in the study area. However, while acknowledging that microhabitats required for the species are present, the BDAR does not calculate any offsets for the loss of this species' essential habitat.

This conflicts with the EIS's Table 7.4 which states that the species is retained for offset.

NPWS disputes the claim in the BDAR that the species is not known from the area and that the clearing of *Bursaria* during the project's construction will not impact the species.

Recent targeted surveys conducted by NPWS found the species in this section of the park on 1 September 2025 and it is recorded at another location further north. See **Figure 1** for those sightings.

It is NPWS's experience in conducting these surveys that multiple visits between September and early November need to occur to find extant populations of butterflies.

In terms of the management of the butterfly's essential habitat, the subspecies, *Bursaria spinosa subsp. lasiophylla*, is a low-growing shrub, rarely reaching 4–5 metres. It is considered suitable for classification as 'low-growing vegetation' for the purposes of Transgrid's Tree Management Plan, meaning that it could be retained (and, indeed, planted) under the powerlines following upgrade of the powerline.

### NPWS recommends:

- The Purple Copper Butterfly (*Paralucia spinifera*) should be assumed to be present in the area.
- A revised BDAR should calculate the offset obligations and identify appropriate mitigation measures to limit impacts on the species such as:
  - Clearing of *Bursaria* to avoid the period between September and December.

- Avoidance of ground disturbance when clearing Bursaria where possible.
- Vegetation maintenance activities during the operational phase to avoid clearing of Bursaria except as required for ongoing use and maintenance of the access track.



**Figure 1. Purple Copper Butterfly Records in and near Gardens of Stone State Conservation Area**



## 2. Works in Gardens of Stone State Conservation Area

NPWS is pleased that the EIS and supporting documents clearly outline the extent of works in NPWS-managed lands. This has made a targeted review of the Environmental Impact Statement (EIS) easier and will also facilitate the authorisation of works under the *National Parks and Wildlife Act 1974* (NPW Act).

It is confirmed that the substantial works in the park relating to the upgrade of the existing 132kV line (Line 94E), widening of the clearing in the corridor and the access trail associated with this corridor will be subject to an initial construction agreement and then an easement under section 153 of the NPW Act. This will include the access points to the corridor to the east, north and west of the corridor. NPWS queries the area subject to the existing easement for this powerline and the increased area subject to the new easement under the NPW Act. Section 6.2.2 of Technical Report 4 states that the existing easement currently occupies 13.8 ha of the park, and that the increase will be 3.9 ha. NPWS notes that the original occupation permit for the powerline was granted for an area of 18 ha (not 13.8 ha). See **Figure 2**.

In contrast, the minor trail upgrades elsewhere in the park will be subject to a separate approval by NPWS Blue Mountains Branch in the form of an authorisation (known as 'a consent') under the National Parks and Wildlife Regulation 2019.

Both the easement and the consent will be subject to conditions. Works on access trails, for example, must be carried out to NPWS satisfaction, and appropriate measures put in place to ensure continued NPWS access for park management activities.

NPWS is satisfied that the upgrade of the trail in the main corridor will result in a trail that meets the standard under the [NSW Fire Trail Standards](#) (RFS 2023) suitable for a Category-1 firefighting appliance. A Cat-1 standard is appropriate to allow for ongoing use by heavy trucks to construct and maintain the line. This trail is currently not mapped in the Chifley Lithgow Fire Access Fire Trail Plan but can be added at the next update.

One of NPWS requirements is that the creek crossing between towers 21D and 22D is formalised. Technical Report 1 – Water Impact Assessment fails to identify that this unnamed creek is a third-order stream. NPWS advises that, prior to recent works to repair the trail, this crossing has often been impassable following wet weather.

Another requirement is for each access point to the corridor (and also the Line 70/71 corridor) be secured with a locked gate and wing fencing to maintain integrity of the track network servicing the Transgrid lines by preventing unauthorised access to the park. Gates have been installed on the eastern boundary of the park but are missing on the western boundary.

Lastly, it is noted that three north-south trails through the park are identified for minor upgrades. The middle trail is not identified in the [Gardens of Stone State Conservation Area vehicle access strategy](#) (NPWS-DCCEEW 2024) and NPWS has identified there is no ongoing need for this trail for park management purposes. Accordingly, contrary to the statement in section 6.2.2 of Technical Report 4, NPWS will require closure and revegetation of this middle trail at the end of construction works.

### NPWS recommends:

- Conditions of consent to identify that works within the park are subject to NPWS authorisation, and that all trail works are to be carried out to NPWS satisfaction, and consistent with the Gardens of Stone State Conservation Area Vehicle Access Strategy (NPWS-DCCEEW 2024) at completion of construction works, including:
  - Gates and wing fencing to be installed and maintained at the park boundary on the trails accessing the powerline easements to prevent unauthorised access to the park.
  - Closure and revegetation of any tracks or trails not mapped as part of that strategy.
- A formal creek crossing to be constructed as part of the trail upgrades over the third-order stream between towers 21D and 22D.
- The Construction Environmental Management Plan to be developed in consultation with NPWS to outline procedures for park management access during construction.

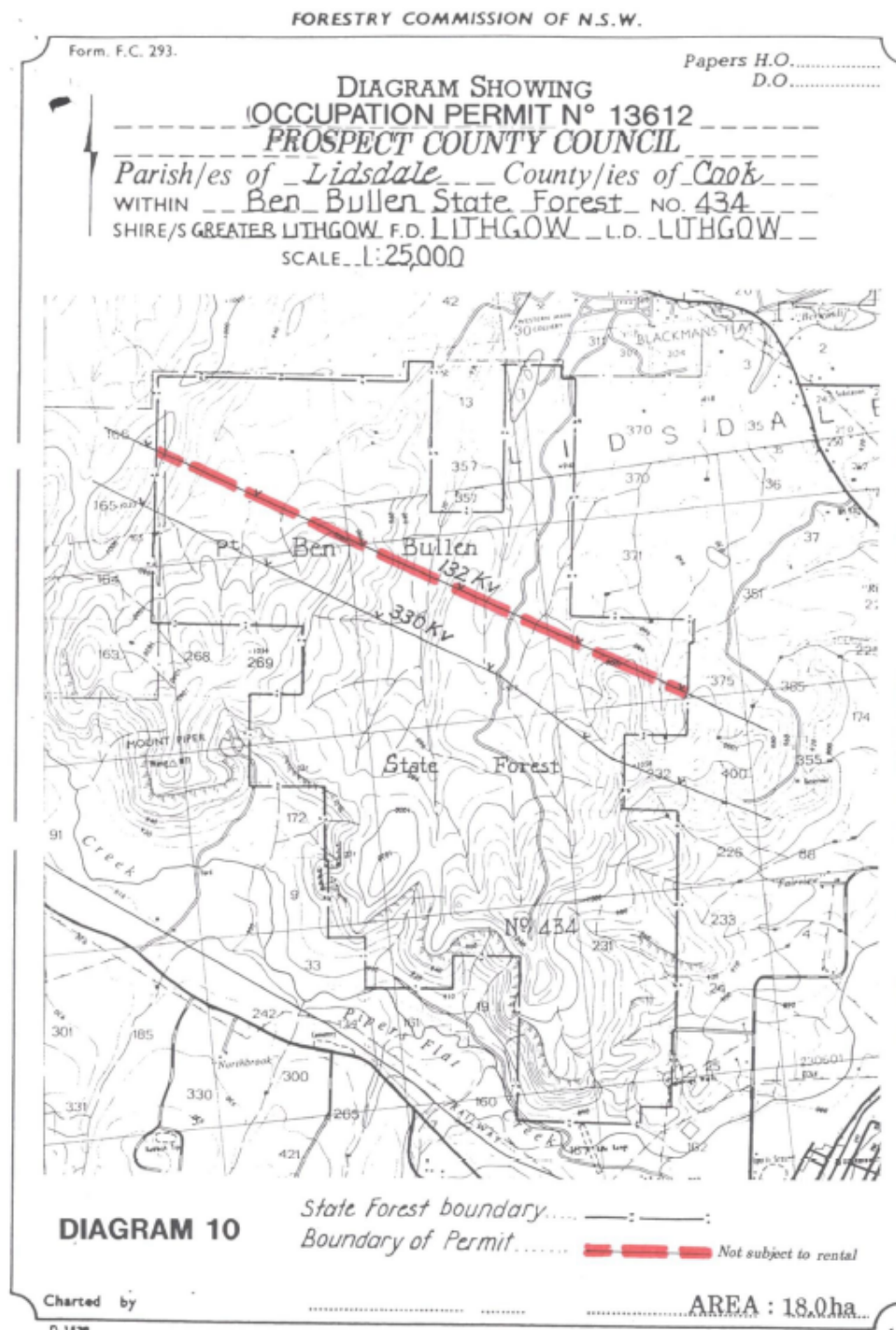


Figure 2. Extract from Occupation Permit No. 13612 for the construction of Line 94E.

### 3. Offsetting biodiversity impacts in Gardens of Stone State Conservation Area

NPWS has a clear position that development in formal protected areas – which have been reserved or acquired for a conservation purpose by the NSW Government – must not reduce or erode the biodiversity values of the protected area network. Hence, it is important that offsets for the impacts on park should result in improved conservation outcomes for the protected area network, through conservation actions on park or additions to park.

NPWS flags it has already been involved in discussions on the offset strategy and would like to continue having a role in those discussions.

**NPWS recommends:**

- NPWS to continue to be consulted in development and delivery of the Biodiversity Offset Strategy.