

# Bango Wind Farm

## Heritage Management Plan


15 April 2025

  
**SQUADRON  
ENERGY**



Final

### Revision Control

Revision	Date	Issue	Author	Reviewed	Approved	Signature
000A	13/10/18	CWP	Julie Dibden			
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004	15/04/25	Updated to incorporate consultation feedback	Mirelle Gouws	Sheree Kidziak	Candice Somerville	

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## Key Terms and Abbreviations

Abbreviation	Meaning
<b>AHIMS</b>	Aboriginal Heritage Information Management System
<b>BWF</b>	Bango Wind Farm, the Project
<b>CoA</b>	Condition of Approval
<b>Department, the</b>	Commonwealth Department of the Environment and Energy
<b>Development Corridor</b>	The approved Development Corridor as defined in the Development Consent, comprising of a 100m buffer around all approved infrastructure.
<b>Disturbance area</b>	The physical space impacted by the construction, operation and maintenance of the wind turbines and associated infrastructure. This includes the land cleared for turbine installation, access roads, electric installations, and any temporary or permanent changes to the surrounding environment.
<b>DOEE</b>	Commonwealth Department of the Environment and Energy, now Cth DCCEEW
<b>DPE</b>	NSW Department of Planning and the Environment, now DPHI
<b>DPHI</b>	NSW Department of Planning, Housing and Infrastructure (previously DPE)
<b>EA</b>	Environmental Assessment
<b>EMS</b>	Environmental Management Strategy
<b>EP&amp;A Act</b>	NSW <i>Environmental Planning and Assessment Act 1979</i>
<b>FSA</b>	Full Services Agreement
<b>GE</b>	GE Renewable Energy Australia
<b>Heritage Item</b>	An item as defined under the Heritage Act and/or an Aboriginal object or Aboriginal Place as defined under the NPW Act.
<b>Heritage NSW</b>	Heritage Group of NSW DCCEEW
<b>HMP</b>	Heritage Management Plan
<b>NPW Act 1974</b>	National Parks and Wildlife Act 1974
<b>O&amp;M</b>	Operations and Maintenance
<b>Project Site</b>	The land within the cadastral boundaries associated with the proposed Project, as defined in the Development Consent.
<b>RAPs</b>	Registered Aboriginal Parties - Aboriginal stakeholders registered for cultural heritage consultation for the development
<b>Secretary, the</b>	Secretary for the NSW Department of Planning, Housing and Infrastructure
<b>SSD</b>	State Significant Development
<b>SQE</b>	Squadron Energy
<b>WTG</b>	Wind Turbine Generator

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# 1 Introduction

Squadron Energy Pty Ltd (SQE) has updated the Heritage Management Plan (HMP) on behalf of Bango Wind Farm Pty Ltd (The Proponent), to reflect the operational phase of the Bango Wind Farm (BWF, the Project). This revision has been completed pursuant to Condition 18 of Schedule 2 of the State Significant Development (SSD) 6686 Consolidated Consent Mod 1 (further referred to as the NSW Development Consent) which states:

*To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval.*

The Project consists of 46 wind turbine generators (WTGs), access roads, hardstands, laydown areas, internal electrical reticulation, a substation, an operations and maintenance facility, up to 6 km of overhead transmission line and a switching station. A map showing all finalised Project infrastructure is shown in Figure 1.

Operation of the BWF formally commenced on 14 December 2023. GE Vernova (GE) is contracted under a Full Services Agreement (FSA) by the Proponent to operate and maintain the WTG. TransGrid own and manage the substation. Operation of the substation is undertaken remotely by TransGrid or locally from the control room in the substation as required. As such the environmental management and compliance requirements of the substation is entirely outside the remit of the Proponent.

## 1.1 Purpose and Scope

The Project Environmental Management Strategy (EMS) requires environmental management plans and programs to be prepared relevant to the stage of the development to enable effective risk management, compliance with relevant statutory requirements, consistency with the relevant project documents and to meet environmental objectives and targets.

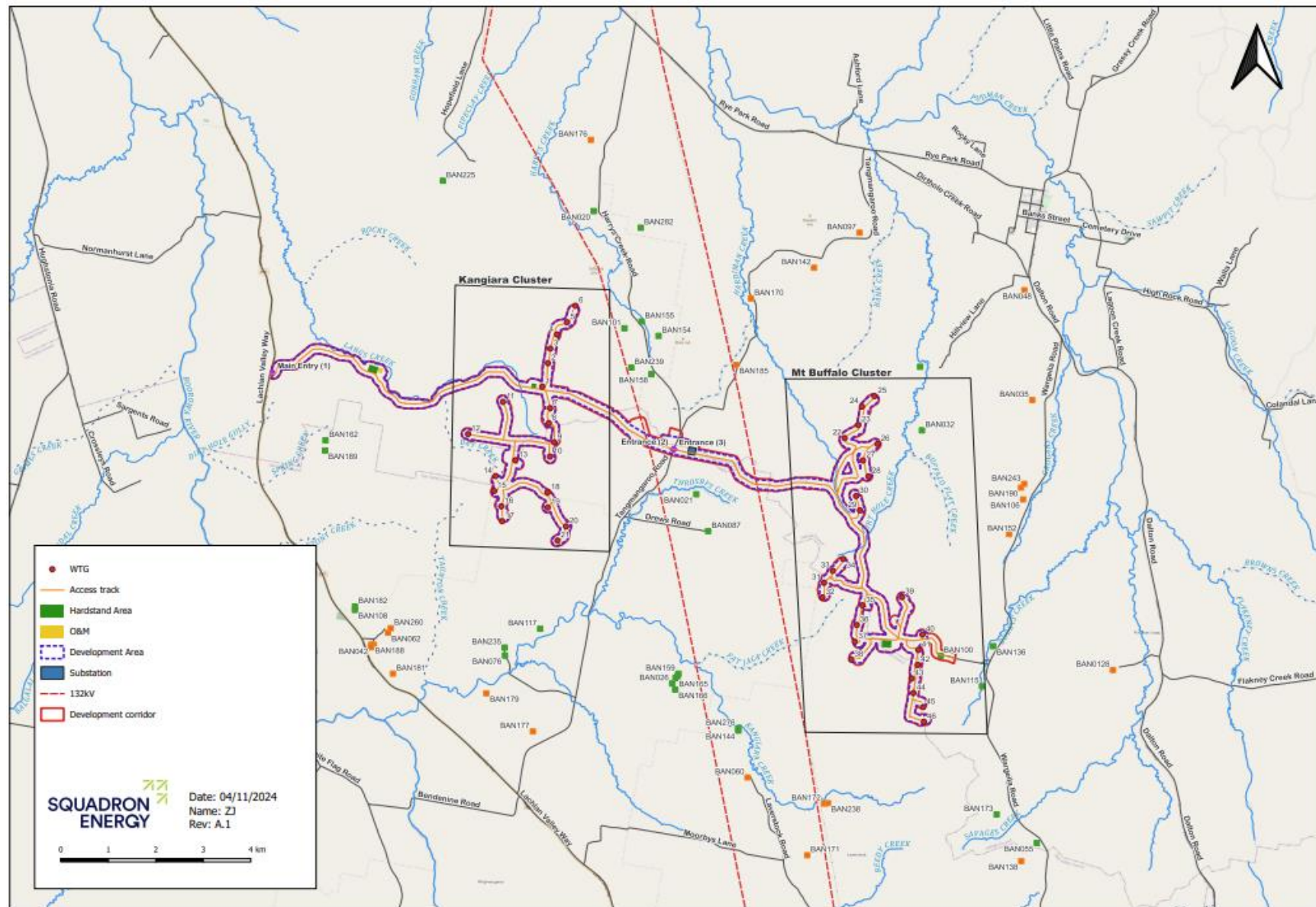
The HMP has been developed to meet the requirements of the NSW Development Consent (SSD-6686 Mod 1), specifically conditions 22 - 23 of Schedule 3. The scope of this HMP is to ensure that the development does not cause any direct or indirect impact on any Heritage items located outside the approved disturbance area; and to provide the management measures that will be used to avoid and mitigate potential impacts of the Project on Aboriginal heritage during the operational phase, including the roles and responsibilities for implementation. This plan has been developed as a component of, and should be read in conjunction with, the Project's EMS.

The HMP describes:

- The procedures for the management of identified objects within the Project site.
- The procedures to be followed if any unidentified objects and/or human remains are identified during operation or decommissioning.
- The process for how the HMP procedures will be managed and adhered to during the operation or decommissioning of the project.
- The process that will be followed for continuing consultation with the Aboriginal stakeholders, Heritage NSW and DPHI, where required.

The Applicant will implement the measures described in this HMP, upon approval by the NSW Department of Planning, Housing and Infrastructure (DPHI) of this HMP.





### Figure 1 BWF Layout

## 1.2 Legislative Requirements

Table 1 lists the Acts and Regulations that prescribe the protection of Aboriginal and other historic Heritage Objects and Places to which the Project must comply.

**Table 1 Relevant Legislation and Policies**

Legislation	Relevance
<b>Environmental Protection and Biodiversity Conservation (EPBC) Act 1999</b>	Determined to be a Controlled Action on 7 May 2013 by the Commonwealth Department of Environment. Approval issued 9/8/18 EPBC 2013/6810.
<b>Environment Planning and Assessment (EP&amp;A) Act 1979</b>	Development Consent SSD 6686 issued 2018 by the Land and Environment Court.
<b>National Parks and Wildlife Act as amended (1974)</b>	Provides protection for Aboriginal Objects and or Aboriginal Places.
<b>National Parks and Wildlife Amendment Regulation 2009</b>	Provides protection for Aboriginal Objects and or Aboriginal Places.
<b>Heritage Act 1977 (Heritage Act)</b>	Provides protection for heritage items.
<b>Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Commonwealth)</b>	Aims to preserve and protect from injury or desecration areas and objects in Australia and in Australian waters, being areas and objects that are of particular significance to Aboriginals in accordance with Aboriginal tradition.

## 1.3 Conditions of Approval

Table 2 lists the Heritage conditions 22 - 23 of Schedule 3 of SSD-6686 and provides a reference to sections within the HMP where the conditions have been addressed. A description of how the Project will comply with the broader requirements of the NSW Development Consent and EPBC Approval is provided in the EMS.

**Table 2 Conditions of Approval relevant to this Management Plan**

CoA (Schedule 3)	Requirement	Section this is Addressed
22	<p><b>Protection of Heritage items</b></p> <p><i>The Applicant must:</i></p> <ul style="list-style-type: none"> <li>(a) ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 in Appendix 6, or located outside the approved disturbance area; and</li> <li>(b) minimise any impacts on the Aboriginal heritage items identified in Table 2 in Appendix 6.</li> </ul> <p><i>Note: The locations of the Aboriginal heritage items referred to in this condition are shown in the figure in APPENDIX 6.</i></p>	Section 2.1 including Figure 2 and 3, and Table 4
23	<p><b>Heritage Management Plan</b></p> <p><i>Prior to the commencement of construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:</i></p> <ul style="list-style-type: none"> <li>a. be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Secretary;</li> <li>b. be prepared in consultation with OEH and Aboriginal stakeholders; and</li> <li>c. include up to date baseline mapping of the heritage items within and adjoining the development disturbance area.</li> <li>d. Include a description of the measures that would be implemented for:</li> </ul>	Julie Dibden received endorsement from the Secretary on 6/2/19 to prepare the HMP (6/6/19), which received approval from

CoA (Schedule 3)	Requirement	Section this is Addressed
	<ul style="list-style-type: none"> <li>protecting Aboriginal heritage items identified in Table 1 in Appendix 6 and any items located outside the project disturbance area;</li> <li>minimising and managing the impacts of the development on heritage items identified in Table 2 in Appendix 6;</li> <li>a contingency plan and reporting procedure if: <ul style="list-style-type: none"> <li>Aboriginal heritage items outside the approved disturbance area are damaged;</li> <li>previously unidentified Aboriginal heritage items are found; or</li> <li>Aboriginal skeletal material is discovered;</li> </ul> </li> <li>ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and</li> <li>ongoing consultation with Aboriginal stakeholders during the implementation of the plan;</li> </ul>	DPE on 24/6/19. Section 1.4 See Figures 2 and 3 and Section 2.1 Section 4 Section 4 Section 4.2 Section 4.1 Section 4.3 Section 4.5
	(e) a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.	Section 1.4 Section 5
	Following the Secretary's approval, the Applicant must implement the Heritage Management Plan.	

## 1.4 Consultation

A formal process of Aboriginal consultation had been conducted for this project, as documented in Dibden (2013) for the construction phase of the Project. Table 3 shows the Registered Aboriginal Parties (RAPs) that were consulted. Contact details for the RAPs are provided in Appendix A.

**Table 3 Registered Aboriginal Parties**

RAP name
Arnold Williams - Ngunnawal Elders Corporation
Buru Ngunawal Aboriginal Corporation
Peter Falk Consultancy
Ngunawal Heritage Aboriginal Corporation
Onerwal Local Aboriginal Land Council

No salvage works were required to be undertaken prior to or during construction of the BWF. All the sites required to be avoided as per Table 1, Appendix 6 of the SSD 6686 Mod 1 were located outside the approved disturbance area. Furthermore, no unexpected finds requiring salvage were encountered during construction. Further consultation with the RAPs listed in Table 3 was therefore not required.

Consultation with the RAPs will however be undertaken in the event of any unexpected Aboriginal objects or burials being found during the operation of the wind farm (Refer to Section 4.1).

As part of the update to this management plan for the operational phase of the Project, consultation was undertaken with the RAPs listed in Table 3. The RAPs were contacted and provided with the updated HMP for their review. No feedback was received from the RAPs. The consultation log and supporting evidence are provided in Appendix D.



## 2 Environmental Conditions

### 2.1 Existing Conditions

The Aboriginal heritage in the Development Corridor was recorded during the Environmental Assessment (EA) in 2012, as documented in the report entitled:

Julie Dibden 2013 Proposed Bango Wind Farm European and Aboriginal Cultural Heritage Assessment Report. *A report to Wind Prospect CWP Pty Ltd.*

An additional field survey was conducted on 25 March - 26 March 2019, the results of which is documented in addendum correspondence to the EA dated 3 April 2019. The additional survey was conducted in areas of the Development Corridor that had not previously been surveyed and no additional Aboriginal object locales were recorded.

The Aboriginal object locales recorded during the EA are listed in Table 4. The location of all Aboriginal object locales is shown in Figure 2 to 3. Detailed maps clearly showing the area encompassed by each Aboriginal object locale are shown in Appendix B.

**Table 4 A Summary of the Aboriginal object locales identified by Dibden (2013) and the management measures as per Appendix 6 of the NSW Development Consent (SSD-6686 Mod 1).  
Coordinate system: GDA.**

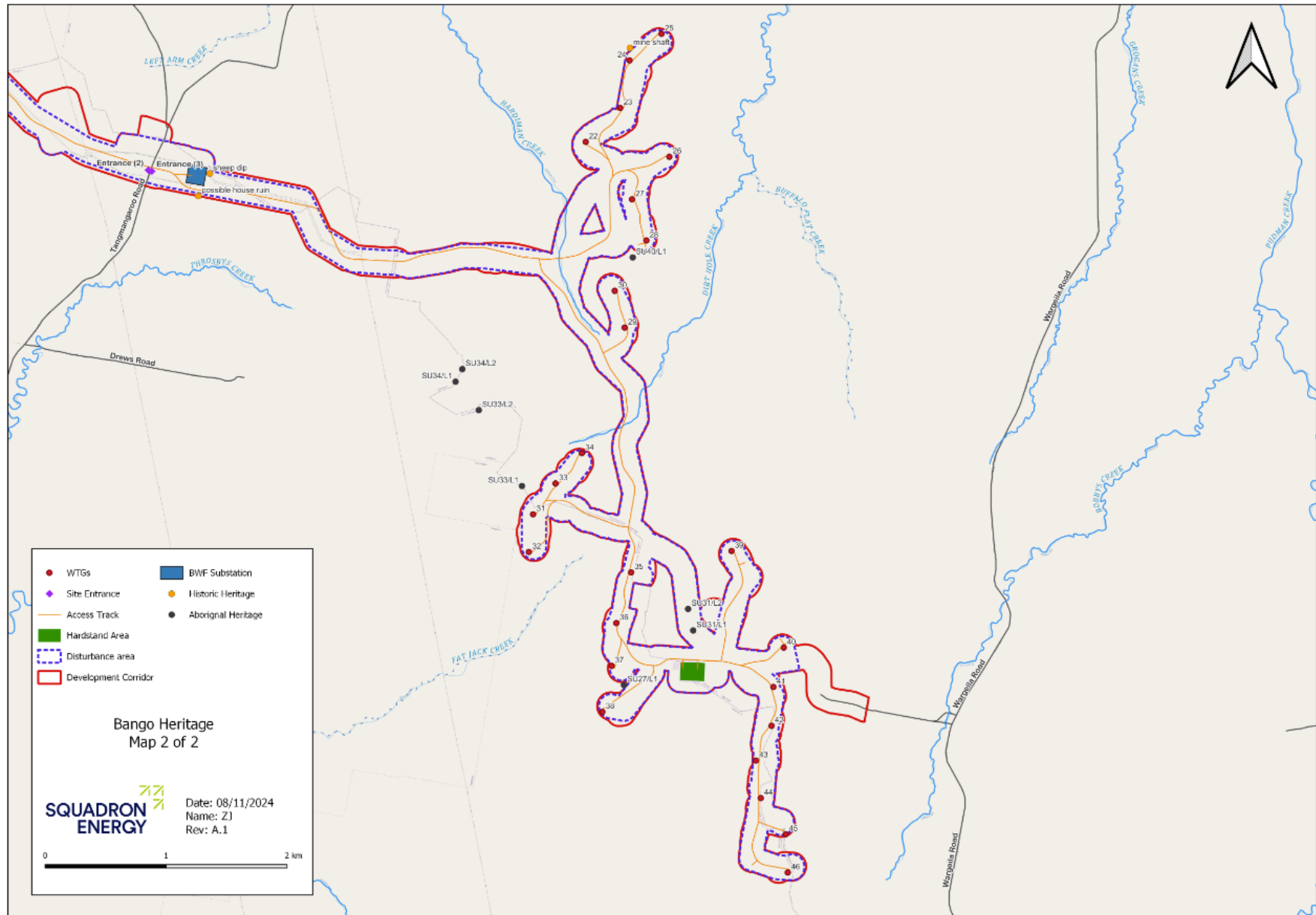
Name	AHIMS Site ID	Comments	Easting	Northing	Impacts: avoid or minimise (Appendix 6 of the DA)
SU4/L1	51-4-0299	1 artefact on a casual vehicle track in SU4	661332	6178976	Avoid impacts
SU8/L1	51-4-0365	5 artefacts in animal and vehicle track exposures in SU8	662260	6178462	Avoid impacts
SU9/L1	51-4-0366	1 isolated artefact in a cultivated paddock in SU9	663049	6177863	Avoid impacts
SU9/L2	51-4-0367	5 artefacts located in an extensive area of erosion in SU9	663949	6177258	Avoid impacts
<del>SU14/L1</del>	<del>51-4-0368</del>	<del>7 artefacts located on a casual vehicle track in SU14</del> Note: Removed as part of Mod 1	<del>663847</del>	<del>6171872</del>	<del>Avoid impacts</del>
SU16/L1	51-4-0369	5 artefacts located on a casual vehicle track in SU16	660657	6175646	Minimise impacts
SU27/L1	51-4-0370	3 artefacts located along a sheep track in SU27	671324	6169442	Minimise impacts
SU31/L1	51-4-0301	17 artefacts located along a graded vehicle track in SU31	671897	6169892	Minimise impacts
SU31/L2	51-4-0300	3 artefacts located along a graded vehicle track in SU31	671855	6170070	Minimise impacts
SU33/L1	51-4-0371	3 artefacts on a graded track and drain area in SU33	670481	6171086	Avoid impacts
SU33/L2	51-4-0372	2 artefacts located on an animal track in SU33	670124	6171713	Avoid impacts
SU34/L1	51-4-0373	2 artefacts located on a sheep track in SU34	669932	6171948	Avoid impacts

Name	AHIMS Site ID	Comments	Easting	Northing	Impacts: avoid or minimise ( <i>Appendix 6 of the DA</i> )
<b>SU34/L2</b>	51-4-0374	1 artefact located on a sheep track in SU34	669988	6172052	Avoid impacts
<b>SU40/L1</b>	51-4-0499	2 artefacts located on a casual vehicle track in SU40	671397	6172975	Minimise impacts

The potential historic items recorded during the EA are listed in the table below and are shown in Figures 2 and 3. Two additional potential historic items were recorded during the additional survey conducted on 25 March - 26 March 2019.

**Table 5 Summary of potential historic items**

ID	Easting	Northing	Location	Recommendations
House	661885	6178175	Outside current development corridor	N/A
Dams	661898	6178283		
Mine shaft	671374	6174706	In Development Corridor	Ensure no inadvertent impact by maintaining a 20m exclusions zone
Sheep dip	667900	6173669		
Possible house ruin	667805	6173483		



**Figure 2 Aboriginal Heritage Locales and historic sites - east end of Project Area.**

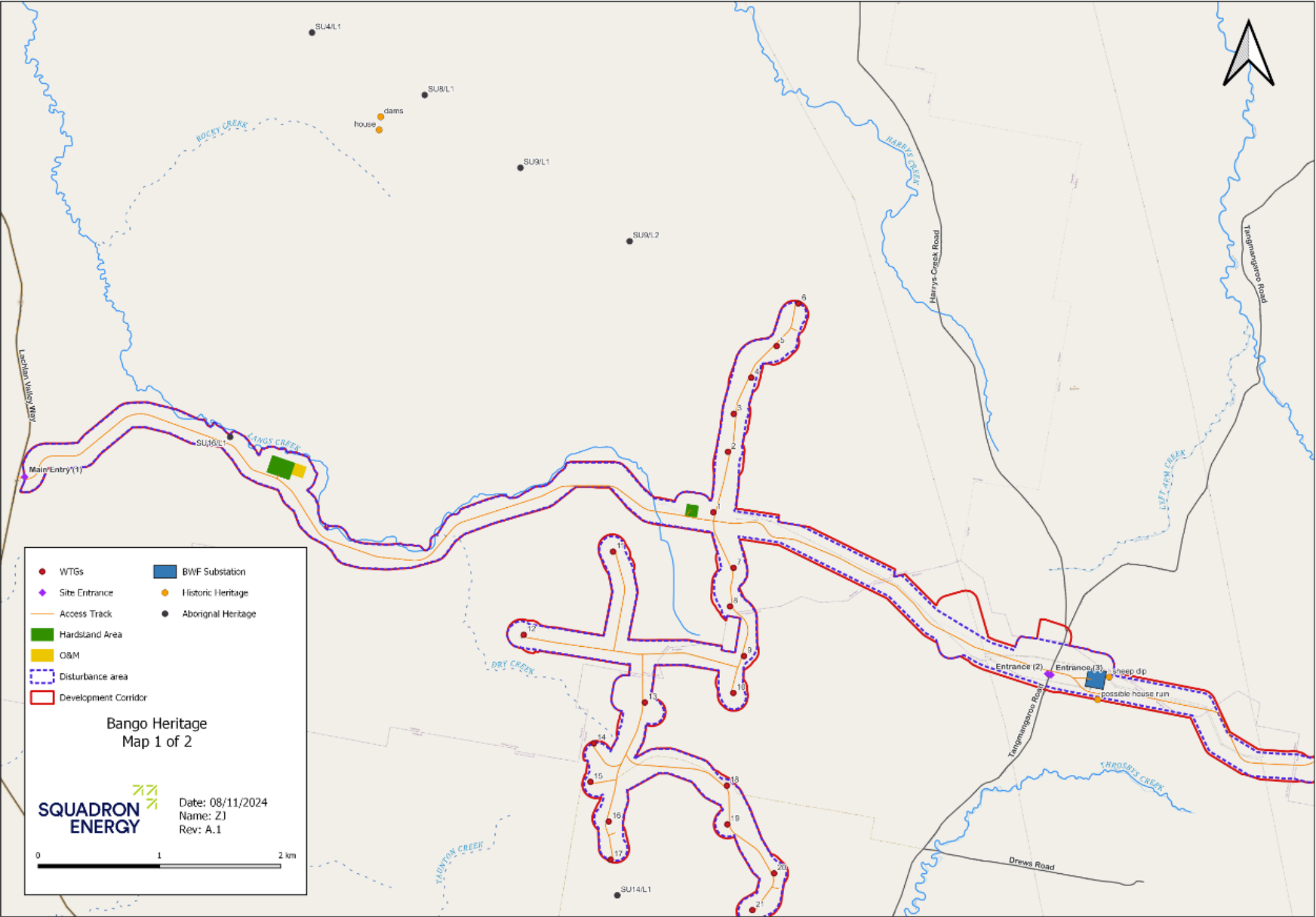


Figure 3 Aboriginal Heritage Loci and historic sites - west end of Project Area

## 2.2 Construction Salvage Operations

During construction of the Project, artefacts listed in Table 4 and Table 5 were avoided and/or the necessary mitigation measures implemented to minimise impacts. No salvage was therefore required.

## 2.3 Potential Operational Impacts

During the Project's operational phase, the risks of impact to remaining Aboriginal locales is negligible. No new construction works are anticipated nor required during the operation of the Wind Farm.

All maintenance works would be restricted to the existing approved disturbance area of the internal access track, cable route, turbines, hardstands and O&M area.

Nevertheless, artefacts may become exposed following heavy storm events, or as a result of regular disturbance from maintenance activities. Under such circumstances, the Unexpected Finds Procedure should be followed, see Section 4.1.

## 2.4 Potential Decommissioning Impacts

Upon decommissioning of the BWF in its entirety or for any particular WTG, the approved disturbance area would be contained within the Development Corridor and would be restricted to areas previously disturbed during construction, such as the cable route, hardstand and O&M area.

Nevertheless, artefacts may become exposed following heavy storm events, or as a result of regular disturbance from operational activities. Avoidance of Aboriginal objects will be adopted as the primary measure to reduce impacts. Where impacts cannot be avoided, management measures will be implemented as described in Section 4 or as updated by subsequent reviews to this plan.

# 3 Roles and Responsibilities

The general responsibilities for the roles described below are provided in the BWF EMS. The responsibilities described in Table 6 relate to the implementation of the HMP.

**Table 6 Roles and responsibilities.**

Role	Responsibility
<b>Operations Manager</b>	<ul style="list-style-type: none"> <li>Responsible for delivery of the Project in accordance with this HMP</li> <li>Review and approve Project repairs and upgrades, and update Environmental Officer</li> <li>Ensure sub-contractors and agents comply with the HMP, management plans and programs</li> <li>Notify Environmental Officer if artefacts are found or suspected to be present within the works area</li> <li>Responsible for implementing the mitigation measures identified by this plan</li> <li>Issue non-conformance notices and to issue actions to avoid or minimise potential environmental impacts, and failing the effectiveness of such steps, order cessation of a specific activity</li> <li>Ensure all personnel attend a site induction prior to commencing work, which includes the procedures of the HMP</li> <li>Be the primary point of contact for community liaison</li> </ul>
<b>Environment Officer / Advisor</b>	<ul style="list-style-type: none"> <li>Responsible for maintaining this plan</li> <li>Ensure site specific heritage requirements are fulfilled</li> </ul>



Role	Responsibility
<b>FSA Provider (GE)</b>	<ul style="list-style-type: none"> <li>Undertake internal environmental auditing and reporting, if an unexpected finds procedure is triggered</li> <li>Engage Archaeologist, if unexpected finds procedure is triggered</li> <li>Be the primary point of contact for regulatory agency liaison.</li> </ul>
<b>Archaeologist</b>	<ul style="list-style-type: none"> <li>Address any heritage incident, unexpected find or non-conformance, including notification to the Operational Manager immediately upon identifying the issue.</li> <li>Ensure all staff and sub-contractors complete a site environmental and heritage induction prior to commencing work on site;</li> <li>Hold regular project team meetings and toolbox talks, ensuring information is shared between all site personnel; and</li> <li>Monitor management measures, including maintenance of monitoring records and support of auditing</li> <li>Provide documentation required to comply with any heritage reporting requirements.</li> </ul>
<b>RAPs</b>	RAPs to advise in regard to cultural significance and the development of management options, as required.

## 4 Management Measures

This section defines the management measures that will be implemented during the Project's operational phase to manage potential environmental risks and impacts to Heritage.

**Table 7: General management measures**

Activity	Management Measure	Responsibility
<b>Excavation or ground disturbance</b>	An exclusion zone will be defined where heritage locales occur within 20m of works, by installing temporary fencing and signage. Temporary fencing will be installed using suitable materials that will remain in place and be effective for the duration of decommissioning activities	Operational Manager FSA Manager
<b>Decommissioning</b>	Earthworks for decommissioning should not take place in the immediate vicinity of any Aboriginal object/sites until an updated HMP is finalised and endorsed by the Department of Planning Housing and Infrastructure (DPHI).	Operational Manager Environmental Officer

### 4.1 Unexpected Finds

In the unlikely event that unexpected Aboriginal objects/values or historic sites are encountered during maintenance activities undertaken in the operational phase, the following steps should be followed:

- The person who identified the Aboriginal objects/values or historic sites must immediately notify the person in charge of the activity and refer the matter to the Operational Manager.

- All current works that could potentially harm the Aboriginal objects/values or historic sites must cease (including stopping all construction within 20 m).
  - Works may continue outside of the minimum 20 m barrier.
  - Works required to comply with occupational and environmental health and safety standards and/or to protect the cultural heritage, may continue.
- The Operational Manager shall notify the Environmental Officer, who will contact an experienced and qualified archaeologist.
- Within five (5) working days the archaeologist must be engaged to:
  - record and detail the location and context of the Aboriginal objects/ values or historic sites; and
  - assess the cultural or scientific values of the objects in accordance with the methodology used in the Environmental Assessment.

### Aboriginal heritage

Sites considered to be of low significance (e.g. isolated artefacts or disperse/small artefact scatters less than three artefacts, eroding earth features, items typically identified of low cultural value) and where avoidance is impossible, no further mitigation is required. The results for the assessment shall be documented and recorded by the archaeologist and monitoring records prepared and maintained by the Operational Manager (see Section 5.1 and 5.2).

If the archaeologist determines that Aboriginal objects or values potentially of moderate or high significance, it is preferable to avoid impact if possible. Where avoidance is possible, an exclusion zone must be defined where heritage locales occur within 20m of works, by installing temporary fencing and signage. The results of the assessment will be documented and recorded by the archaeologist and monitoring records prepared and maintained by the Operational Manager (see Section 5.1 and 5.2).

Where avoidance is not possible, the discovery must be reported by the Archaeologist to the NSW Heritage Office (Heritage NSW) and RAPs as soon as practicable after being assessed by the Archaeologist, to determine whether salvage works are required. The Secretary for Planning must approve any salvage works. The archaeologist must facilitate the involvement of any relevant RAPs if any further works are required as soon as practical to develop a suitable methodology for further works in consultation with the RAPs. The proponent will be responsible for the costs associated with the assessment, cataloguing, labelling and packaging of this aboriginal heritage material.

The location and context of the heritage material must be recorded in detail and an Aboriginal Heritage Information Management System (AHIMS) Site Form, and an Aboriginal Site Impact Recording Form (if applicable) must be completed and submitted to Heritage NSW within four (4) months from the end of management works.

Work may re-commence within the area of exclusion once the actions outlined above have been undertaken, or where all parties (the Proponent, Heritage NSW and RAPs) agree there is no other prudent or feasible course of action. Failure of parties to reach an agreed course of action will be classed as a *dispute*. Principles and procedures relating to dispute resolution are detailed in Section 4.4.

### Historic heritage

Unexpected finds may not be significant and therefore would not be classified as relics requiring management. Relics may appear as structure (or ruins) comprised of bricks, sandstone, timber and accumulations of artefacts such as broken ceramic and glass.

A 'relic' under the Heritage Act is defined as any deposit, object or material evidence that:

- relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement; and
- is of State or local heritage significance.

If relics are discovered during project activities the following steps will be taken:

- all work in a 10 m radius of the discovery will cease. If it was deemed necessary, the Archaeologist would ensure a larger area was defined;
- the Archaeologist will be consulted to assess the find;
- if the Archaeologist determines that the find is a relic, Heritage NSW will be notified under Section 146 of the *NSW Heritage Act 1977* (the Heritage Act). In addition, DPHI would be notified;
- archaeological investigation of new finds must occur in accordance with professional standards.

## **4.2 Impacts to Aboriginal Heritage Items Outside the Approved Disturbance Area**

Should impacts occur to Aboriginal heritage items outside the approved disturbance area occur, the following process should be adhered to:

- Do not further disturb or move the items;
- Immediately cease work in the vicinity and cordon area off;
- Notify the Operational Manager, archaeologist and the Heritage NSW Environment Line on 131 555 as soon as practicable and provide available details of the items and their location; and
- Do not re-commence work in the area unless authorised in writing by Heritage NSW.

## **4.3 Discovery of Human Remains**

Should suspected human remains be encountered, the following process should be adhered to:

- Do not further disturb or move the remains;
- Immediately cease work in the vicinity and cordon area off;
- Notify the NSW Police;
- Notify the Operational Manager, archaeologist and the Heritage NSW Environment Line on 131 555 as soon as practicable and provide available details of the remains and their location; and
- Do not re-commence work in the area unless authorised in writing by Heritage NSW.

## **4.4 Dispute Resolution**

Where a dispute between a RAP or RAPs and the proponent occurs, the dispute must be jointly investigated.

Only issues directly related to cultural heritage management will be handled through the following dispute resolution mechanism.

- The RAP must contact the Archaeologist (via email or phone) if they wish to raise a dispute. Contact details for the Project will be available on the Project website.
- The relevant RAP and the proponent must nominate delegates to attempt to negotiate a resolution to the dispute.
- The delegates will attempt resolution within five (5) business days of a notice being issued by either party that a dispute is deemed to exist. Within this time, they may meet / consult with other delegates from either party and the project archaeologist.
- An extension to the five (5) days may be made but must be agreed to by both the proponent and the relevant RAP.

- Advice in regard to resolution of a dispute may need to be sought from NSW DPHI and any advice received should be accepted by both parties.

## 4.5 Heritage Training and Induction

Heritage training and inductions will ensure that on-site personnel are well-informed about the project's heritage criteria, potential risks and impacts, and the requirements of the HMP.

The Environmental Officer, or delegate, will prepare induction training material in consultation with the Archaeologist. As a minimum, the training and induction material should include the following topics:

- Familiarisation with this HMP (current improved version)
- Aboriginal and non-Aboriginal cultural awareness and regulatory protection requirements
- Roles and responsibilities in protecting Aboriginal and Cultural Heritage
- Observation and monitoring requirements during ground disturbance works for possible Aboriginal and other historic objects and skeletal material
- HMP notification and chance find procedures

This training and induction will be provided:

- Annually, throughout the project's life
- To all site workers and contractors
- By the contractor's Operational Manager or contractor's delegated environmental representative.

The training will be delivered through one of the various methods, including toolbox talks, inductions, and other appropriate mediums.

Induction records will be maintained to demonstrate compliance with the requirements of this HMP. Records will include:

- Who was trained;
- When training occurred;
- Name and relevant details of trainer; and
- Description of training content.

## 5 Monitoring

This section defines the monitoring and reporting measures that will be implemented during the Project's operational phase where a salvage activity or incident, as defined in the following Sections, has occurred.

### 5.1 Salvage Monitoring

Monitoring of heritage mitigation measures will be undertaken to record the effectiveness of control measures and inform adaptive management of the environmental management plans and programs.

**Table 8 Monitoring activities by the Operational Manager and Contractor's (GE Vernova) Operational Manager**

Monitoring by Operational Manager	Monitoring by Contractor's Operational Manager
<p>Prior to salvage/earthworks:</p> <ul style="list-style-type: none"> <li>Ensure that Aboriginal object locales that are not salvaged have been demarcated have been clearly identified and demarcated as required.</li> <li>Ensure that salvage works in work zones have been completed prior to works in that area.</li> </ul> <p>Post salvage/earthworks:</p> <ul style="list-style-type: none"> <li>Ensure that demarcated areas for protection of Aboriginal object locales have not been disturbed.</li> <li>Daily inspection of any fences around Aboriginal object locales in active work zones.</li> </ul>	<p>The Contractor's Operational Manager will provide weekly reports to the Operational Manager during the salvage/earthworks.</p> <p>Weekly reports will:</p> <ul style="list-style-type: none"> <li>detail heritage inductions provided</li> <li>identify any unexpected archaeological finds which have been encountered during maintenance activities</li> <li>detail any areas which have been subject to salvage works.</li> </ul>

## 5.2 Monitoring Records

Results of monitoring will be recorded by the Operational Manager as part of an inspection checklist that will include as a minimum:

- date of inspection;
- personnel undertaking the inspection;
- features to be inspected/monitored;
- outcomes of the inspection and details of compliance with objectives;
- requirement for any corrective actions; and
- details of any photographic records (file name and saved location) detailing evidence of monitoring.

Results of all monitoring will be maintained at the Project office for supply to relevant agencies upon request.

## 5.3 Reporting Incidents

For the purposes of this HMP, an incident is defined as:

- Impacts to any Aboriginal object locales which as identified in Appendix 6, Table 1 of the SSD 6686 Mod 1 are to be avoided;
- Impacts to any historic sites which as identified in this management plan are to be avoided;
- The identification of unexpected finds; and
- Identification of any human skeletal remains.

In accordance with Condition 4 of Schedule 4 of the NSW Development Consent, *'the Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of the incident. The notification must identify the development, including the development application number and the name of the development, and set out the location and nature of the incident'*.

GE Vernova's Operational Manager or decommissioning contractor is responsible for notifying the Operational Manager of any incident, as soon as practicable.

Pursuant to Condition 5 of Schedule 4, any non-compliance must also be notified to the Department *'in writing to compliance@planning.nsw.gov.au within 7 days after the Applicant becomes aware of any non-compliance. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the*



*reasons for the non-compliance (if known) and what actions have been done, or will be undertaken, to address the non-compliance’.*

GE Vernova’s Operational Manager or decommissioning contractor must provide to the Operational Manager all records and documentation to support the notification of the Secretary as required by Condition 4 of Schedule 4.

## 6 Review

The plan may be required to be reviewed in response to the occurrence of an incident, the submission of an audit report, modification to the conditions of the NSW Development Consent or if any new heritage item is identified in accordance with Condition 2 of Schedule 4 of the NSW Development Consent. Review of the plan will be undertaken to the satisfaction of the Secretary. Updates to the plan will be made available on the Project website.

## 7 References

Dibden, J. 2013 *Bango Wind Farm European and Aboriginal Cultural Heritage Assessment Report. A report to CWP Renewables Pty Ltd.*

Dibden, J 2019 *Additional Archaeological Assessment.*

## Appendix A Contact details for Registered Aboriginal Parties

Entity	Contact Details
Arnold Williams - Ngunnawal Elders Corporation	Mob: 0431271500 Email: <a href="mailto:blakneycreek@gmail.com">blakneycreek@gmail.com</a>
Buru Ngunawal Aboriginal Corporation	Mobile: 0419 425 347; Email: <a href="mailto:walbell@bigpond.net.au">walbell@bigpond.net.au</a>
Peter Falk Consultancy	<a href="mailto:kanga26@live.com.au">kanga26@live.com.au</a>
Ngunawal Heritage Aboriginal Corporation	Mobile: 0412 176 081 Fax: (07) 5630 8597 Email: <a href="mailto:ngunawalhac@gmail.com">ngunawalhac@gmail.com</a>
Onerwal Local Aboriginal Land Council	Phone: (02) 6226 5349 Email: <a href="mailto:onerwal@gmail.com">onerwal@gmail.com</a>

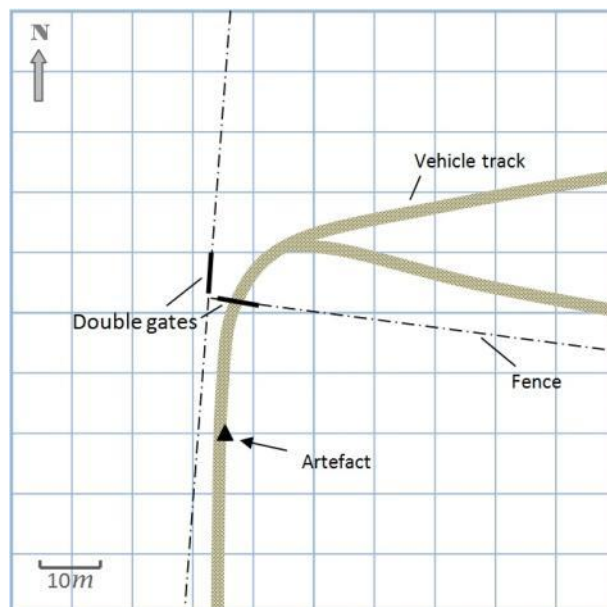
## Appendix B Aboriginal Object Locales

### Bango WF Survey Unit 4/Locale 1

One stone artefact was recorded in an area of vehicle track exposure in this locale within Survey Unit 4. The landform is a broad crest of very gentle gradient and an open aspect. The artefact was located in an area measuring 50m x 5m, of which 20% was ground exposure, possessing 80% archaeological visibility. The effective survey coverage is high, and given that one artefact only was recorded, artefact density is assessed to be very low. The vehicle track area is highly disturbed, but away from this, additional artefacts may be present in a subsurface context, although these would be distributed at very low density.



**Bango WF SU4/L1 looking 285°**



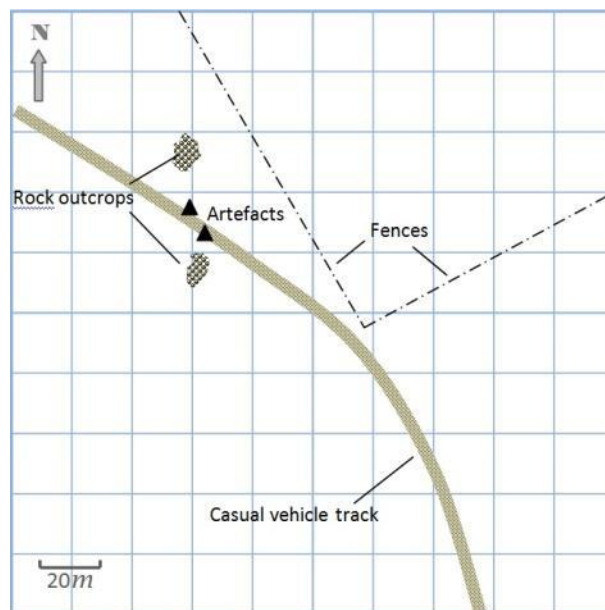
**Sketch map showing location of Bango WF SU4/L1**

**Bango WF Survey Unit 8/Locale 1**

Five stone artefacts (plus 3 quartz *possible* artefact pieces) were recorded in a vehicle/animal track exposure at this locale in Survey Unit 8; the artefacts were in an area of 10 x 3m. The landform is broad undulating crest with very gentle gradient and open aspect. The artefacts were located in an exposure measuring 100m x 5m (overall), of which 60% was ground exposure, possessing 90% archaeological visibility. The effective survey coverage is high, and given that only five artefacts were recorded, artefact density is assessed to be very low. The site has subsurface potential given some depth to the soils, but artefact density is predicted to be very low.



**Bango WF SU8/L1 looking 300°.**



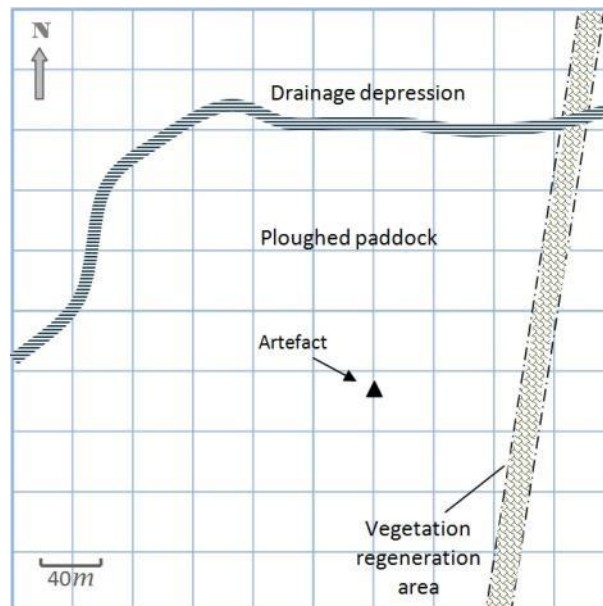
**Sketch map showing location of Bango WF SU8/L1**

**Bango WF Survey Unit 9/Locale 1**

One stone artefact was recorded in a previously ploughed paddock at this locale within Survey Unit 9. The landform is a simple slope with gentle gradient and an aspect to 30°. The broad paddock area possesses 30% ground exposure, with 60% archaeological visibility. The effective survey coverage within the entire paddock is high and given that one artefact only was recorded it is assessed to be a genuine isolated find, and artefact density for this locale is assessed to be very low. The site has subsurface potential given some depth to the soils, and artefact density is predicted to be very low.



**Bango WF SU9/L1 looking 300°**



**Sketch map showing location of Bango WF SU9/L1**

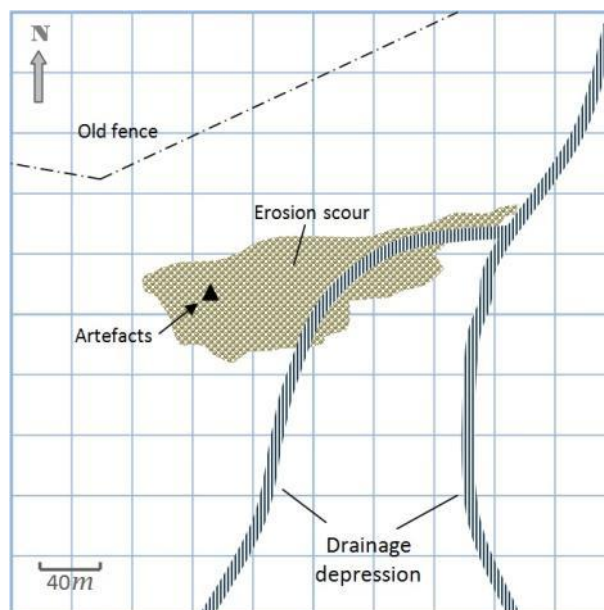


**Bango WF Survey Unit 9/Locale 2**

Five stone artefacts and 3 possible quartz artefact pieces were recorded in an extensive area of sheet and gully erosion in this locale within Survey Unit 9. The landform is a simple slope of gentle gradient and an aspect to 90°. The artefacts were located in an area of 50 x 50 m, within a broader area (75 x 85m) which has 10% ground exposure, of which 90% was archaeological visibility. The effective survey coverage is high, and artefact density is assessed to be very low. The locale may contain additional artefacts (in areas which have not sustained erosion), but these would be present in very low density. To the east, nearer to the creek line, there is some subsurface potential and artefact density is assessed to be low/moderate.



**Bango WF SU9/L2 looking 230°**



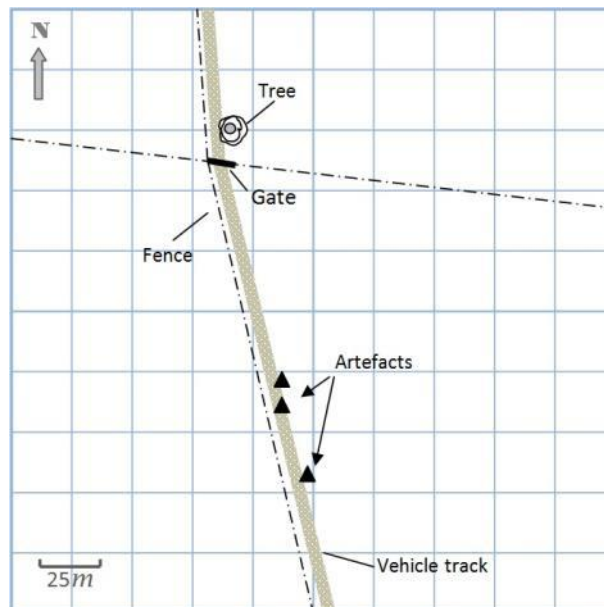
**Sketch map showing location of Bango WF SU9/L2**

**Bango WF Survey Unit 14/Locale 1**

Seven stone artefacts were recorded in an area of vehicle track exposure in this locale within Survey Unit 14. The landform is a broad crest of very gentle gradient and an aspect to 150°. The artefacts were in an area of exposure measuring 75 x 3m, possessing ground exposure of 50%, of which 60% was archaeological visibility. The effective survey coverage during field survey was high, and artefact density is assessed to be very low. The locale has subsurface potential given some depth to the soils, and artefact density is predicted to be very low.



**Bango WF SU14/L1 looking 150°**



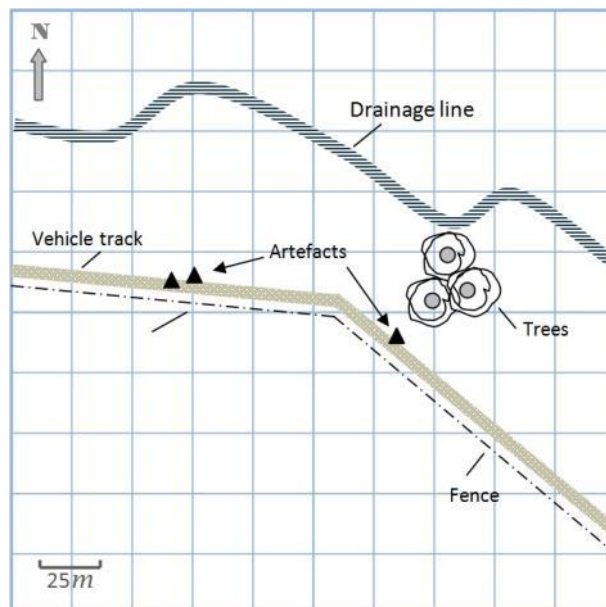
**Sketch map showing location of Bango WF SU14/L1**

**Bango WF Survey Unit 16/Locale 1**

Five stone artefacts were recorded in an area of vehicle track exposure at this locale within Survey Unit 16. The landform is a basal slope of very gentle gradient and open aspect, c. 60m from a creek, and is generally disturbed. The artefacts were recorded in an area measuring 125 x 2m, possessing actual ground exposure of 40%, of which 50% was archaeological visibility. The effective survey coverage is high, and artefact density is assessed to be low. The locale is predicted to contain additional artefacts, distributed at low density and in a disturbed context.



**Bango WF SU16/L1 looking 120°**



**Sketch map showing location of Bango WF SU16/L1**

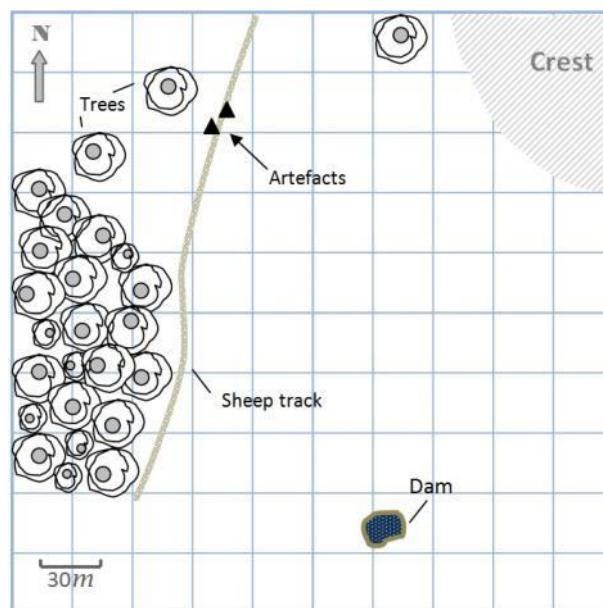


**Bango WF Survey Unit 27/Locale 1**

Three stone artefacts were recorded in an area of exposure associated with an animal track in this locale within Survey Unit 27. The landform is an eroded crest of gentle gradient and an aspect to 90°. The area in which artefacts were recorded measures 30 x 0.5m of which 90% is ground exposure, possessing 90% archaeological visibility. The effective survey coverage is high, and artefact density is assessed to be low. The locale may contain additional artefacts, with some subsurface potential, but these would be present in low density.



**Bango WF SU27/L1 looking 175°**



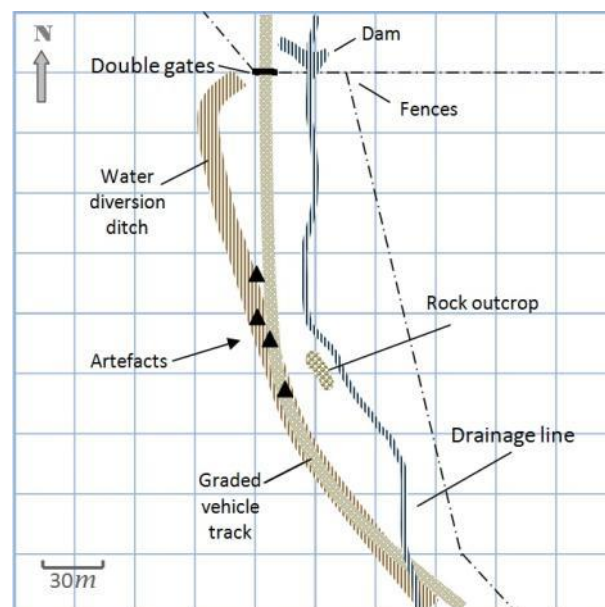
**Sketch map showing location of Bango WF SU27/L1**

### Bango WF Survey Unit 31/Locale 1

Seventeen stone artefacts were recorded in a highly disturbed area of ground exposure associated with a graded vehicle track and accompanying water diversion ditch within this locale. The landform is an upper slope/open depression interface with gentle gradient and northerly aspect. The artefacts were located in an area of 75 x 3m, within a broader 150 x 50m area possessing 80% ground exposure, of which 80% was archaeological visibility. The effective survey coverage is high, and artefact density is assessed to be low/moderate. The upper section of the soil profile throughout much of this locale has been removed through the construction of the vehicle track and water drainage ditch so that while there may be subsurface artefacts present, these would be situated in a highly disturbed context.



**Bango WF SU31/L1 looking 160°**



**Sketch map showing location of Bango WF SU31/L1**

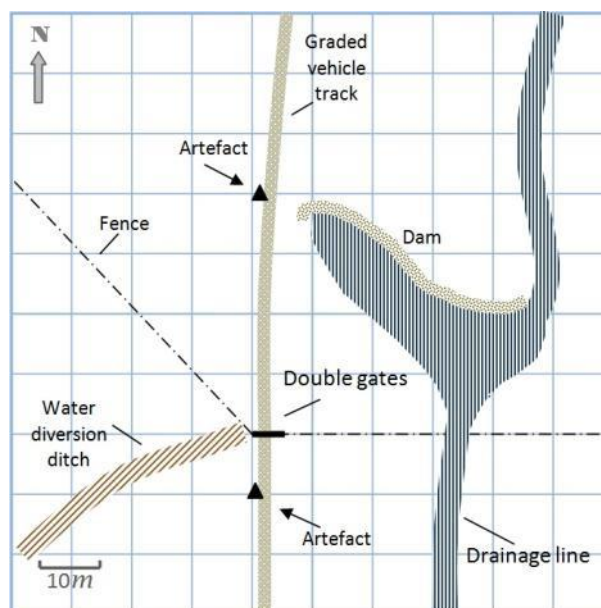


### Bango WF Survey Unit 31/Locale 2

Three stone artefacts were recorded in an area of vehicle track ground exposure at this locale within Survey Unit 31. The landform is a upper slope/open depression interface of very gentle gradient and an aspect to 300°. The artefacts were located in an area measuring 50 x 3m, with 80% ground exposure of which 60% was archaeological visibility. The effective survey coverage is high, and artefact density is assessed to be low/moderate. This locale is highly disturbed due to the construction of a water drainage ditch and the vehicle track, wherein soils have been imported and used as road base. Accordingly, while there may be subsurface artefacts situated within this locale, these would be present in a highly disturbed context.



**Bango WF SU31/L2 looking 150°**



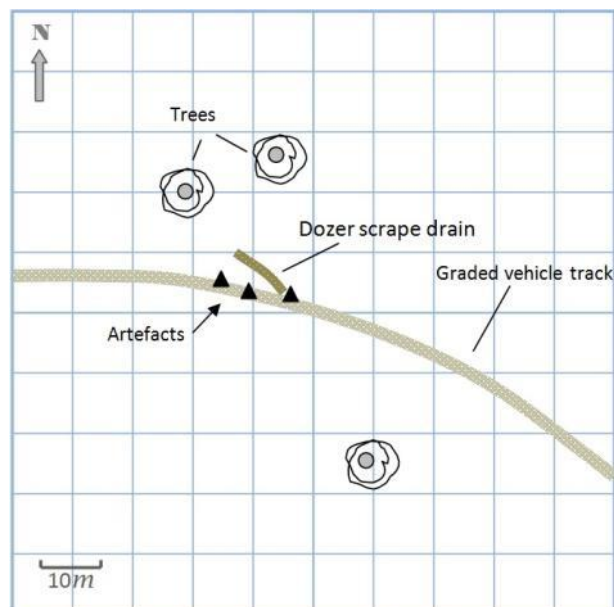
**Sketch map showing location of Bango WF SU31/L2**

**Bango WF Survey Unit 33/Locale 1**

Three stone artefacts, probably derived from the same knapping event, were recorded in a 10 x 3m area of ground exposure associated with an eroded and graded vehicle track in this locale within Survey Unit 33. The landform is a crest of very gentle gradient and an open aspect. The effective survey coverage is high, and given that these were the only artefacts recorded, it is surmised that they were produced as the result of an isolated knapping event. The locale may contain additional artefacts, but these would be present in low density and in a disturbed context due to track grading works.



**Bango WF SU33/L1 looking 270°**



**Sketch map showing location of Bango WF SU33/L1**

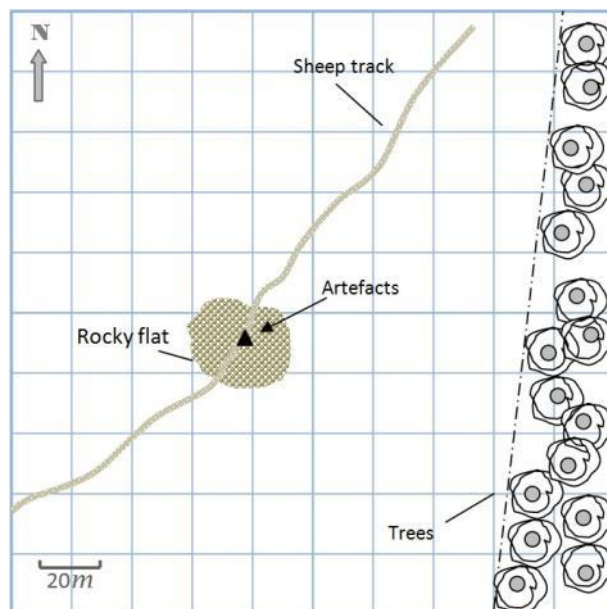


**Bango WF Survey Unit 33/Locale 2**

Two stone artefacts (8 m apart) were recorded in an area of bare earth exposure in this locale within Survey Unit 33. The area is a slight rise which is very rocky. The landform is a crest of very gentle gradient and open aspect. The broader area has ground exposure of 30%, of which 60% was archaeological visibility. The effective survey coverage is reasonable, and given that two artefacts only were recorded, artefact density is assessed to be very low. The locale may contain additional artefacts, but these would be present in very low density. Because of the skeletal nature of the lithosol the site has no subsurface potential.



**Bango WF SU33/L2 looking 230°**



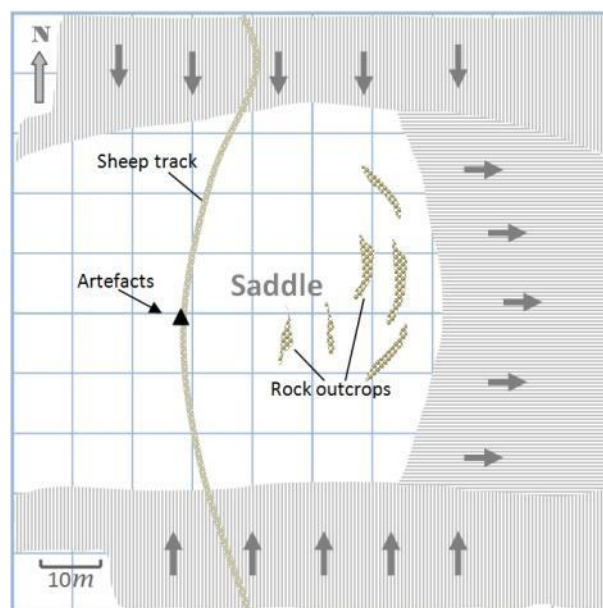
**Sketch map showing location of Bango WF SU33/L2**

**Bango WF Survey Unit 34/Locale 1**

Two stone artefacts (c. 2 m apart) were recorded in an area of bare earth exposure in this locale within Survey Unit 34. The landform is a saddle of gentle gradient and open aspect. The broader saddle area has ground exposure of 10%, of which 90% was archaeological visibility. The effective survey coverage is reasonable, and given that two artefacts only were recorded, artefact density is assessed to be very low. The locale may contain additional artefacts, but these would be present in very low density. Because of the skeletal nature of the lithosol the site has limited subsurface potential.



**Bango WF SU34/L1 looking 0°**



**Sketch map showing location of Bango WF SU34/L1**

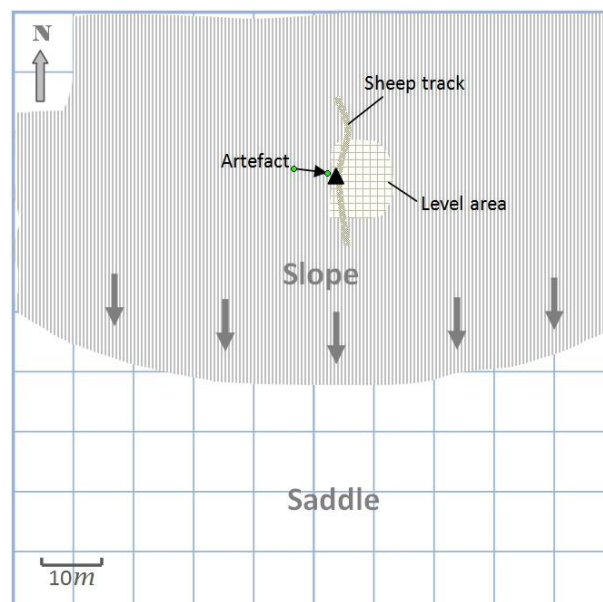


**Bango WF Survey Unit 34/Locale 2**

One stone artefact was recorded in an area of bare earth exposure in this locale within Survey Unit 34. The landform is a crest of gentle gradient and an aspect to 150°. The broader crest area has ground exposure of 10%, of which 60% was archaeological visibility. The effective survey coverage is reasonable, and given that one artefact only was recorded, artefact density is assessed to be very low. The locale may contain additional artefacts, but these would be present in very low density. Because of the skeletal nature of the lithosol the site has no subsurface potential.



**Bango WF SU34/L2 looking 0°**



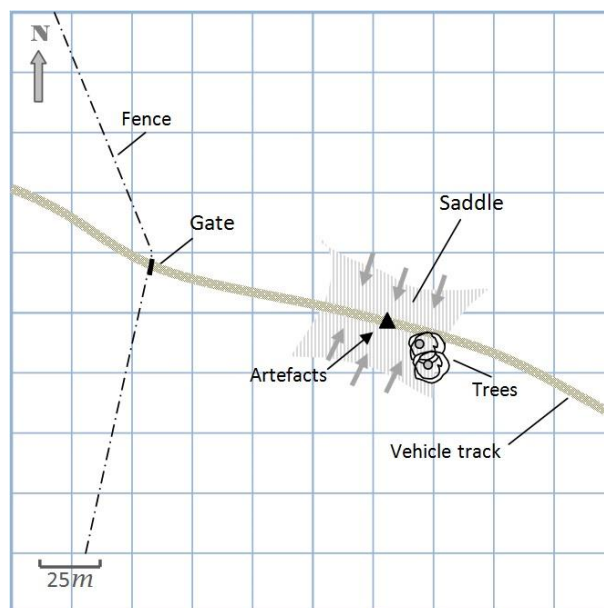
**Sketch map showing location of Bango WF SU34/L2**

**Bango WF Survey Unit 40/Locale 1**

Two stone artefacts were recorded in an area of bare earth exposure in this locale within Survey Unit 40. The landform is a saddle on a crest of gentle gradient. The broader area has ground exposure of 5%, of which 90% was archaeological visibility. The effective survey coverage is reasonable, and given that two artefacts only were recorded, artefact density is assessed to be very low. The locale may contain additional artefacts but these would be present in very low density. Because of the eroded and skeletal nature of the lithosol the site has no subsurface potential.



**Bango WF SU40/L1 looking 150°**



**Sketch map showing location of Bango WF SU40/L1**



## Appendix C Aboriginal Object Locales – Impact minimisation

NSW Archaeology Pty Ltd was commissioned by CWP Renewables to relocate and demarcate previous recorded Aboriginal object locales that have the potential to be impacted by future works at the proposed Bango Wind Farm. This was undertaken on 25 March 2019 by Andrew Pearce and Jo Dibden, NSW Archaeology Pty Ltd, and Tegan Dobliger, CWP Renewables Pty Ltd. This brief report outlines and documents this work.

The subject Aboriginal object locales were identified and recorded during a previous Aboriginal heritage survey undertaken by NSW Archaeology Pty Ltd in 2013. Due to the redesigning of elements of the original wind farm layout, a number of Aboriginal object locales recorded then are now outside areas of proposed impacts. However, SU16/L1, SU31/L1 and SU31/L2 do fall within proposed impact areas and in order to ensure they are not impacted by works, they require relocation and demarcation (Table 1).

In addition, SU27/L1 was identified to be situated in some vicinity of an area of proposed works. Its status was physically checked while in the field and it was determined that this Aboriginal object locale was outside the impact corridor. Nevertheless, as a safety measure the locale was marked out to avoid any inadvertent harm.

Aboriginal object locale SU16/L1 (Plate 1) is situated immediately adjacent and to the north of an existing farm fence line. In order to avoid this site it was determined that impacts in this area, which entails the construction of an access track, should be relocated to the southern side of the fence, away from the nearby creek, and into a heavily worked paddock (Plate 2).



**Plate 1. SU16/L1 looking east.**



**Plate 2. Yellow line showing the fence line adjacent to SU16/L1, any impacts should be relocated to the south of this fence.**

Aboriginal object locales SU31/L1 and SU31/L2 (Plate 3) are situated to the west of a south to north running drainage line. The locales are reasonably closely sited, and the proposed impact for both is the construction of an access track. It was determined in the field that the most expedient way to avoid both locales was to construct the track to the west of existing water diversion mounds (Plate 4), in areas which had already been impacted through the construction of those mounds.



**Plate 3. SU31/L1 looking southeast.**



Plate 4. SU31/L1 and SU31/L2 with the yellow line delineating the position where water diversion mounds are situated. Any impacts should be relocated to the west of this mark.

Table 1. Grid references delineating the areas where proposed impacts should be relocated.

Locale	Proposed Impact	New Location	Grid Points
SU16/L1	Access track	To the south of the existing adjacent paddock fence	To the south of the line formed by: 660655e.6175630n; 660634e.6175655n; 660523e.6175667n.
SU31/L1 & SU31/L2	Access track	To the west of the existing water diversion mounds	To the west of the line formed by: 671816e.6170295n; 671820e.6170072n; 671854e.6169967n; 671877e.6169872n; 671949e.6169796n;



## Appendix D RAP Consultation

Table D.1 RAP Consultation Log

Date	Group	Comment	Method
4/03/2025	Arnold Williams - Ngunawal Elders Corporation	Stephanie Rusden (SR) sent updated HMP for review	Email
4/03/2025	Buru Ngunawal Aboriginal Corporation	SR sent updated HMP for review	Email
4/03/2025	Peter Falk Consultancy	SR sent updated HMP for review	Email
4/03/2025	Ngunawal Heritage Aboriginal Corporation	SR sent updated HMP for review	Email
4/03/2025	Onerwal Local Aboriginal Land Council	SR sent updated HMP for review	Email
4/03/2025	Onerwal Local Aboriginal Land Council	SR received bounce back email advising new email address (onerwal@gmail.com)	Email
4/03/2025	Onerwal Local Aboriginal Land Council	SR forwarded updated HMP for review to new email address	Email

Squadron Energy is Australia's leading renewable energy company. Proudly Australian owned, our mission is to be a driving force in Australia's transition to a clean energy future by providing green power to our customers.

We develop, operate and own renewable energy assets in Australia, with 1.1 gigawatts (GW) of renewable energy in operation and a development pipeline of 20GW.

With proven experience and expertise across the project lifecycle, we work with local communities and our customers to lead the transition to Australia's clean energy future.

Squadron Energy acknowledges the Traditional Owners of Country throughout Australia. We pay our respects to Elders past, present, and emerging.

