



an agency of the  
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
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Case ID: 20888

Date: Monday, 20 November, 2023

## Interim Comment

### In terms of Section 38(3) of the National Heritage Resources Act (Act 25 of 1999)

Attention: South Africa Mainstream Renewable Power Developments (Pty) Ltd

SRK Consulting (South Africa) (Pty) Ltd (SRK) was appointed by Mainstream to undertake the Environmental Authorisation (EA) for the development of the Stilfontein PV Cluster and associated infrastructure, ~6 km north-east of Stilfontein, in the City of Matlosana and JB Marks Local Municipalities, and Dr Kenneth Kaunda District Municipality (DKKDM) in North West Province (SRK Project Number: 581877/Project 10).

A Basic Assessment (BA) was submitted in terms of the National Environmental Management Act, Act 107 of 1998 (NEMA) and the NEMA EIA Regulations 2014, as amended. 9 x PV facilities, including 11-33 kV transmission lines, each including Battery Energy Storage Systems (BESS), and 9 x Independent Power Producer (IPP)-side on-site substations (EAs have been issued for all nine of these applications); 9 x Eskom-side on-site substations and 132 kV grid lines to the Main Transmission Station (MTS); and 1 x MTS and 400 kV lines to existing 400kV Hermes Pluto 1 and 2 transmission lines. The current application is for the associated grid infrastructure include a substation to connect to the authorised Snipe PV facility.

Beyond Heritage has been appointed to provide heritage specialist input as part of the EA process in terms of section 24(4)b(iii) of the NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Van der Walt. 2022. Heritage Impact Assessment (required under section 38(8) of the NHRA (No. 25 of 1999) for the proposed Stilfontein Solar Energy Facilities Cluster and Associated Infrastructure, North West Province.*

- Sites of low-density MSA scatters (SF001, SF002 and SF003) which are considered to be of low heritage significance and no mitigation is required.
- Sites of Isolated and low-density lithic Artefacts (SF004, SF005, SF006, SF007) which are considered to be of low heritage significance and no mitigation is required.
- A Historical Farmstead (SF008) considered to be of low heritage significance. Monitoring of the development must be done by the ECO during construction to implement the Chance Find Procedure.
- A stone wall (SF009) considered to be of low heritage significance, however the site must be avoided with a 30 m buffer. If not possible the site should be mapped and recorded prior to applying for a



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destruction permit.

- A small stone-built structure (SF010) considered to be of low heritage significance however no Impact is anticipated and no mitigation required.
- A Stone and cement platform (SF103) considered to be of low heritage significance and no mitigation required.
- Sites with Ruins (SF101, SF102) considered to be of low heritage significance, however, monitoring of the development must be done by the ECO during construction to implement the Chance Find Procedure.
- Burial site (SF011) considered to be of high heritage significance. The burial site must be avoided with a 60 m buffer and it must demarcated.

*Van der Walt, J. 2023. Project 4: Snipe PV. Appendix 1: Project Specific Results. The Stone Age*

- Site of Isolated and low-density lithic Artefacts (SF006) which is considered to be of low heritage significance

#### Interim Comment

SAHRA Development Application Unit (DAU) notes the heritage studies along with the recommendations provided therein.

SAHRA request the submission of a field-based PIA as the study area is of very high palaeontological sensitivity. The assessment must be undertaken by a qualified palaeontologist and the report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments. Further comments will be issued upon the submission of the field-based PIA. The applicant is advised to extend the EA process in terms of section 19(1) of the NEMA EIA regulations in order to address this comment.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully



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Nokusho Ngobeni

South African Heritage Resources Agency

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Natasha Higgitt  
Manager: Development Applications Unit  
South African Heritage Resources Agency

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**ADMIN:**

Direct URL to case: <https://sahris.org.za/node/163360>