

Our Ref:



an agency of the  
Department of Arts and Culture

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CaseID: 20163

Date: Monday September 18, 2023  
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## Interim Comment

**In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Roodraai Solar (Pty) Ltd

**The activities entail the development of an up to 150MW photovoltaic solar facility and associated infrastructure on the Remainder of Portion 10, the Remainder of Portion 1 and Portion 15 of the Farm Roodraai No. 88, situated within the JB Marks Local Municipality area of jurisdiction in the North West Province. The town of Carletonville is located approximately 19km southeast of the proposed development. The project entails the generation of up to 150MW electrical power through photovoltaic (PV) panels. The total footprint of the project will be approximately 300 hectares (including supporting infrastructure on site)**

Environamics Environmental Consultants has been appointed by Varkenslaagte Solar (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Varkenslaagte Solar Energy Facility and Grid Infrastructure near Carletonville, North West Province (DFFE Ref: 14/12/16/3/3/2/2312).

A draft Environmental Impact Assessment (DEIA) was submitted in terms of the National Environmental Management Act, Act 107 of 1998 (NEMA) and the NEMA EIA Regulations (As amended). The proposed development will include solar panels, Battery Energy Storage System (BESS), laydown areas, internal and access roads, trenching for underground cables, powerlines, on-site substation, auxiliary buildings, and fencing.

Banzai Environmental (Pty) Ltd and Dr van Schalkwyk have been appointed to provide heritage specialist input as part of the EA process in terms of section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Butler, E. 2022. Palaeontological Impact Assessment Roodraai Solar Photovoltaic Energy Facility, near Carletonville, North West Province.*

The proposed development area is underlain by the Malmani Subgroup. Several weathered to well-preserved outcrops of stromatolites were identified within the development area.

Recommendations provided in the report include the following:

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- The ECO must be made aware that fossils (stromatolites) of the Malmani (Chuniespoort Group, Transvaal Supergroup) has a High to Very High Palaeontological significance;
- If a well-preserved stromatolite outcrop is uncovered in the development footprint (after vegetation clearance) the stromatolites may be cordoned off and a buffer of 30m may be placed around the outcrop or a reprehensive example should be removed and placed near the offices of the PV as an informative example of fossils in the area.

*Van Schalkwyk, J. A. 2022. Phase 1 Cultural Heritage Impact Assessment: The Development of the Rooidraai Solar Photovoltaic Solar Energy Facility, near Carletonville, North West Province*

No heritage sites were identified within the proposed development area. A Chance Finds Procedure is recommended to be followed.

### Interim Comment

SAHRA is not satisfied with the coverage of the survey conducted as part of the HIA. It is clear from the tracklogs that the majority of the development area was not surveyed. The HIA must be revised to include a more comprehensive survey.

The application is advised to extend the EA process in terms of section 23(1)b of the NEMA EIA regulations in order to address this comment. Further comments will be issued upon receipt of a revised HIA.

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

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**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/609341>