

**Our Ref:**



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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CaseID: 19247

Date: Tuesday July 18, 2023  
Page No: 1

## **Final Comment**

**In terms of Section 38(8), 38(4) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: SRK Consulting (Pty) Ltd - Johannesburg

265 Oxford Road  
Illovo  
2196

### **Stilfontein PV Facility, North West Province**

SRK Consulting (South Africa) (Pty) Ltd has been appointed to undertake the Environmental Authorisation (EA) Application for the development 150 MW Stilfontein PV facility and Associated Infrastructure on the farms Rietfontein RE/388, Rietfontein 82/388 and Doornplaat 3/410 in the Dr Kenneth Kaunda District Municipality, North West Province (DFFE Reference Number: 14/12/16/3/3/1/2749).

The Draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act (NEMA, Act 107 of 1998) and the NEMA EIA Regulations. The study area has an extent of 280 ha and it is located within the Klerksdorp Renewable Energy Development Zone (REDZ). The development includes BESS, 11 - 33kV transmission lines, IPP-side of the Sunbird on-site substation and associated internal infrastructure and facilities inter alia access roads, fencing, lighting, water supply infrastructure, laydown areas and offices.

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

*van der Walt, J. 2023. Heritage Impact Assessment: Stilfontein Solar Energy Facilities Cluster And Associated Infrastructure, Northwest Province.*

14 heritage resources have been identified on the Stilfontein Solar Energy Facilities Cluster which consists of:

- sites of Low density MSA scatters (SF001, SF002 and SF003) which are considered to be of low



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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 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) which must be avoided with a 60 m buffer and it must demarcated, maintained and access for family must be ensured. A grave management plan for Project 2 Sunbird must be compiled and implemented.

*van der Walt, J. 2023. Project 6 Stilfontein PV: Project Specific Results*

Two isolated lithic artefacts (SF004 and SF005) were identified within the development area. These are of low significance and do not warrant further mitigation.

It is noted that a Palaeontological Impact Assessment has been undertaken by Prof Marion Bamford, however the report has not been submitted to the development application. The PIA report has been attached to the development application on the 23/05/2023.

*Bamford, M. 2022. Stilfontein Solar Energy Facilities Cluster and Associated Infrastructure, North West Province Palaeontology Specialist Study*

The proposed project lies in the lower rocks of the Transvaal Supergroup are exposed, in particular the dolomites of the Malmani Subgroup (Chuniespoort Group, Transvaal Supergroup) which are known to contains well-preserved stromatolites, however no fossils were identified during the site visit. A Chance Find

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Protocol has been attached to be implemented during the development.

### Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:

38(4)a – The SAHRA Development Application Unit (DAU) has no objections to the proposed development;

38(4)b – The recommendations of the specialists are supported and must be adhered to. No further conditions are recommended for the development;

38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA DAU Unit (Sityhilelo Ngcatsha/Natasha Higgitt 021 202 8660) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule;

38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Ngqalabutho Madida 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule;

38(4)d – See section 51 of the NHRA regarding offences;

38(4)e – The following conditions apply with regards to the appointment of specialists:

If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;

The Final BAR and EMPr must be submitted to SAHRA for record purposes;

The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS

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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Sityhilelo Ngcatsha  
Archaeology, Palaeontology, Meteorite Assistant  
South African Heritage Resources Agency

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Phillip Hine  
Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

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**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/602786>

**Terms & Conditions:**

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.