PROPOSED DEVIATIONS OF ± 14 KM OF THE PLUTO-MAHIKENG 400 KV POWERLINE WITHIN THE JB MARKS LOCAL MUNICIPALITY UNDER DR KENNETH KAUNDA DISTRICT MUNICIPALITY AND MAHIKENG LOCAL MUNICIPALITY WITHIN THE NGAKA MODIRI MOLEMA DISTRICT MUNICIPALITY, NORTH WEST PROVINCE

COMMENTS AND RESPONSES REPORT

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COMMENTS AND RESPONSE REPORT

DATE OF COMMENT, FORMAT OF COMMENT NAME OF ORGANISATION/I&AP	QUESTION/COMMENT	RESPONSE
8 June 2026 **Letter** South African Heritage Resources Agency Stephen van der Heever	**Interim Comment (Case ID: 28574)** In terms of Section 38(3) of the National Heritage Resources Act (Act 25 of 1999)/In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) Vhubvo Consultancy has been appointed by the National Transmission Company South Africa SOC Ltd to conduct an Environmental Authorisation (EA) Application for the proposed two deviations of ± 14 km of the Pluto-Mahikeng 400kv Powerline with Deviation 1 on Buchansvale 61 IQ/2, Goedgedacht 27 IQ /1, Klipgat 18 IQ /4, Klipgat 18 IQ /8, Klipgat 18 IQ /9, Nooitgedacht 69 IQ /0, Nooitgedacht 69 IQ /3, Illmasdale 70 IQ /2 the JB Marks Local Municipality Dr Kenneth Kaunda District Municipality, and Deviation 2 on Bauwel 128 JO/4 in Mahikeng Local Municipality, Ngaka Modiri Molema District Municipality, North West Province. A Background Information Document (BID) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed two deviations are from the approved Pluto-Mahikeng Substation and Power Line Project (DFFE ref. no.: Ref No. 14/12/16/3/3/2/1051; SAHRIS case ID 11004), which includes the Mahikeng Main Transmission Substation, a ±250 km long 400kV transmission powerline in a 2 km-wide approved corridor for the powerline alignment; and associated infrastructure. Two sections of the required 55 m servitude fall outside the approved 2 km corridor. These sections were not assessed in the original Environmental Impact Assessment (EIA), and as a result, they are not covered by the existing Environmental Authorisation. The first deviation is ±14 km in length is 24 km North West of Pluto MTS while the second deviation, ±45 m is approximately from 15 km south east of Mahikeng between span for Tower 110 to 111. The proposed development is located in an area of Very High palaeontological sensitivity as per the SAHRIS PalaeoSensitivity map. Therefore, a field-based PIA is required. **Interim Comment** The SAHRA Development Applications Unit (DAU) notes the submitted Background Information Document.	The Archaeological and Palaeontological Impact Assessments have been undertaken and will be uploaded on SAHRIS for review.

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	The SAHRA DAU requests that an assessment of the impact to heritage resources that complies with section 38(3) of the NHRA as required by section 38(8) of the NHRA must be conducted as part of the EA process. The HIA must include an archaeological component. The field-based archaeological component of the HIA must be conducted by a qualified archaeologist and must comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports (see www.asapa.co.za or www.aphp.org.za for a list of qualified archaeologists). The Minimum Standards refer to a Letter of Recommendation for Exemption for further studies should the specialist deem it appropriate. SAHRA reserves the right to insist on a field-based assessment should the Letter of Recommendation not provide ample information to make an informed comment. Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewscapes must also be assessed. Since the development is located in an area of Very High palaeontological sensitivity a field-based PIA is required. 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 draft Scoping Report (DSR), Heritage Impact Assessment (HIA), and Palaeontological Impact Assessment (PIA). Should you have any further queries, please contact the designated official using the case number quoted above in the case header.	