



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Nokusho Ngobeni  
Tel:  
Email: [nngobeni@sahra.org.za](mailto:nngobeni@sahra.org.za)  
Case ID: 22459

Date: Tuesday, 15 July, 2025

## **Final Decision**

### **In terms of Section 36(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)**

Justine Wyngaardt  
JUWI Renewable Energies (Pty) Ltd  
20th floor, The Halyard, 4 Christiaan Barnard Street  
Foreshore  
Cape Town  
8001

Legacy Environmental Management Consulting (Pty) Ltd (Legacy EMC), has been appointed by JUWI Renewable Energies (Pty) Ltd (JUWI) as the independent Environmental Assessment Practitioner (EAP)<sup>1</sup> to undertake the application for environmental authorisation (EA) for the Proposed Carpe Diem South SPP & Associated Infrastructure on the Portions 27 of the Farm Doornfontein No. 118 IQ, near Carletonville, Merafong City Municipality, Gauteng.

A Draft Environmental Impact Assessment (DEIA) has been submitted to SAHRA for commenting in terms of Section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). The project proposes the development of approximately 460 ha Carpe Diem South SPP property, as an independent SPP with an electricity generation capacity of up to 150 MW developed in two 75 MW sections, which share all associated bulk infrastructure, as well as the on-site SPP substation. The on-site SPP substation and part of the grid connection/overhead power line (OPL) corridor footprints form part of the Carpe Diem South SPP footprint. In addition, the project entails permanent and temporary/construction infrastructure.

On 24/04/2024 SAHRA issued an Interim Comment requesting that the field-based Phase 1 palaeontological assessment report and S&EIA report and its appendices be uploaded to the case. The PIA phase 1 report was submitted to the case.

PGS Heritage has 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).

*Mann, N. 2024. Heritage Impact Assessment: proposed Carpe Diem Solar Photovoltaic plant 118 IQ, near Carletonville, Gauteng Province.*



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

The author noted that two sites were identified within a region demarcated as restricted and meaning not planned for development.

- One burial ground (CTV01) with approximately 10 informal graves rated as having high heritage significance.
- One locality with stone walling (CTV02) was rated as having low heritage significance.

#### Recommendations

##### - Burial Ground (CTV01)

- The burial ground should be demarcated with a 50-meter buffer zone and should be avoided and left in situ.
- A Grave Management Plan should be developed for the graves, to be implemented during the construction and operation phases (which needs approval by SAHRA).
- If the site is going to be impacted directly and the graves need to be removed, a grave relocation process for these sites is recommended as a mitigation and management measure. This will involve the necessary social consultation and public participation process before grave relocation permits can be applied for with SAHRA under the NHRA and National Health Act regulations.

##### -walling (CTV02)

- No mitigation required.

#### General recommendations

- Implement a chance to find procedures in cases where possible heritage finds are uncovered.

*Butler, E. 2024. PALAEONTOLOGICAL IMPACT ASSESSMENT PROPOSED CARPE DIEM SOLAR PHOTOVOLTAIC PLANT AND ASSOCIATED INFRASTRUCTURE ON THE FARMS VARKENSLAAGTE 119 IQ AND DOORNFONTEIN 118 IQ, NEAR CARLETONVILLE, GAUTENG PROVINCE.*

The study area is largely underlain by the Vaalian aged Malmani Subgroup (Chuniespoort Group, Transvaal Supergroup) with a small portion in the south underlain by the Timeball Hill Formation and Rooihooft



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Formations of the Pretoria Group (Transvaal Supergroup). A very small portion in the south is underlain by unfossiliferous diabase). The Malmani Subgroup is undifferentiated in this area. Updated geology (Council for Geosciences, Pretoria) indicates that the study area is underlain by the Malmani Subgroup (anml) as well as the Timeball Hill and Rooihoogte Formations of the Pretoria Group. No fossiliferous outcrop was detected in the proposed development. If fossil remains are discovered during any phase of construction, either on the surface or exposed by excavations the Chance Find Protocol must be implemented by the ECO/site manager in charge of these developments. These discoveries ought to be protected (if possible, in situ) and the ECO/site manager must report to SAHRA so that mitigation (recording and collection) can be carry out by a paleontologist. Preceding any collection of fossil material, the specialist would need to apply for a collection permit from SAHRA. Fossil material must be curated in an accredited collection (museum or university collection), while all fieldwork and reports should meet the minimum standards for palaeontological impact studies suggested by SAHRA.

*Masondo, N. 2025. RE: Motivation for relaxation of burial site buffer requirement – case id: 22459*

The developer is requesting for a relaxation of 10m buffer zone to 5m around the burial ground (CTV01). This request is due to various environmental constraints on the property such as watercourse and biodiversity no-go areas, the developable area for the CDS SPP has been significantly limited in terms of providing a feasible return on investment for this project. Therefore, a 50 m buffer (as opposed to a smaller buffer distance) would further constrain the developable footprint, making the project less viable without providing substantial additional heritage protection benefits. The JUWI intends to leave the burial ground undisturbed and proposes an intended design of the CDS SPP around the burial site area i.e., the graves will remain in situ, with no relocation required. The main access road has also been shifted to accommodate a potential 10 m buffer as indicated in the attached Proposed CDS SPP Site Development Plan.

*Fourie, W. 2025. BURIAL GROUNDS AND GRAVES CONSERVATION MANAGEMENT PLAN – CARPE DIEM SOLAR PHOTOVOLTAIC PLANT AND ASSOCIATED INFRASTRUCTURE (CTV01)*

The CMP notes that, should the graves be retained in situ, then, there is a need to be demarcated by a fence, with a gate to enable access should any family members request this, and further step are listed in the plan.

On 31/07/2024, the SAHRA issued an interim comment requesting the applicant to upload the S&EIA report once its ready for review.



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Nokusho Ngobeni  
Tel:  
Email: [nngobeni@sahra.org.za](mailto:nngobeni@sahra.org.za)  
Case ID: 22459

Date: Tuesday, 15 July, 2025

The applicant has uploaded the requested DEIA report to the case on 25/03/2025.

### **Final Decision**

SAHRA accepts and approves the relaxation of 100m buffer zone to 5m around the burial ground (CTV01) on condition that:

- An access protocol must be developed to allow the NoK access to the grave.
- Ensure that the graves are not impacted during and after the relaxation of the buffer.
- A section 36 permit must be applied for from the relevant authority when the grave is to be relocated.

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

Yours faithfully

---

Nokusho Ngobeni

South African Heritage Resources Agency

# Carpe Diem South Solar Photovoltaic Plant and Associated Grid Connection Infrastructure Project



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Nokusho Ngobeni  
Tel:  
Email: [nngobeni@sahra.org.za](mailto:nngobeni@sahra.org.za)  
Case ID: 22459

Date: Tuesday, 15 July, 2025

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

---

## ADMIN:

Direct URL to case: <https://sahris.org.za/node/349298>