

APPENDIX G7: Comments & Responses

Comments received during the 2nd 'in-process' public consultation process in terms of the NHRA: 10th March – 13th April 2026

No	COMMENT	RESPONSE
I&AP: Prof. Wolfgang Preiser – Stellenbosch University (Professor and Head: Division of Medical Virology) - 1 April 2026		
1	I have utilised much of the extensive documentation available from your website and would like to register my support for the proposal submitted by Stellenbosch University.	Noted.
I&AP: Chefferino Fortuin: Tiervlei-Ravensmead Erfenis Gemeenskap – 13 April 2026		
2 a	<p>Response to the revised Heritage Statement Section 36 Hardekraaltjie Memorialisation</p> <p>We do not oppose memorialisation in principle, but we reject the manner in which this heritage process has been conducted, the framing of the Heritage Statement, and the exclusion of our community from co-creation in the Draft Conservation Management Plan. We reject the exclusion of the 50 m buffer zone from the memorialisation area, which serves the applicant's interests rather than protecting our spiritual and sacred heritage resource which are included in a Provincial Heritage Resource (PHS) nomination. In all the public meetings and responses, participants including ourselves and from the university staff and students have consistently rejected any proposal that does not include the cemetery and burial ground within that buffer zone¹. We urge the University or HWC committee to impose conditions including the 50 m buffer zone, to ensure this</p>	<p>PHS Consulting has gone above and beyond to involve the community at every opportunity. We have held three (3) Public Meetings, had two (2) rounds of 30-day comment periods, afforded the community the opportunity to be present at the ground-truthing held over two (days) in which transportation and food parcels for the community were arranged for approx. 10 people that included some youth. Chefferino Fortuin and Johannes Bastian (as representatives of the <i>Tiervlei-Ravensmead Erfenis Gemeenskap</i>) have also been involved at numerous online check-in meetings to be kept in the loop of progress made along the way allowing them to 'report back' to the Ravensmead Community on progress. The lengthy public participation process included in Appendix G can attest to this.</p> <p>The community was by no means excluded from the drafting of the Conservation Management Plan (CMP). The CMP was always to form part of the conditions of approval of the Memorialisation along with the establishment of the Hardekraaltjie Memorial Management Committee (HMMC). Upon Chefferino Fortuin's request (check-in meeting dated 4 February 2026) the CMP was drafted upfront and included in the documentation circulated to the public for 30 days to provide them with an opportunity to give input and feedback upfront (Appendix G7d). Furthermore, it is standard practice that the CMP is drafted by a Professional Heritage Consultant who then provides all I&APs with an opportunity to provide comment/</p>

<p>heritage process delivers the justice that the Khoi, San, mixed-race, slave, and African communities were denied in the past but are afforded now under the NHRA.</p>	<p>input. The intended content and purpose of the CMP was also communicated during the 2nd and in more detail at the 3rd public meeting. [Note: No comment was received regarding any details of the CMP].</p> <p>A separate Section 27 process (PHS Nomination) is in progress, as nominated by Chefferino Fortuin, in order for the site to be graded as a Grade II Provincial Heritage Site (PHS). HWC confirmed that the process and extent of the PHS, would be determined by this Section 36 Application. While this process will be ongoing, a PHS grading for Erf 15349 and Erf 18228 is supported. However, a PHS grading for Erf 24602 is not supported. The cemetery (Erf 15349) and Erf 18228 are proposed for Memorialisation. As we know Erf 15349 is the defined historical cemetery and according to GPR scanning there are also a number of anomalies on Erf 18228 (which we have not ground-truthed) and therefore we must assume that the potential for graves here are still a possibility. Although the GPR scanning indicated 6 potential grave targets on Erf 24602, these have been ground-truthed and no graves were found. The buffer zone imposed on Erf 24602 is exactly that, a buffer zone implemented, subject to a S36 application, as a precautionary measure as part of a HWC decision, to protect the heritage resource (Erf 15349 & Erf 18228). Considering the extensive S36 process followed and the outcome of the ground truthing it cannot be afforded the same status as the heritage resource (Erf 15349 and Erf 18228).</p> <p>It must be understood that the 50m buffer zone came about in November 2017 when Perception Planning submitted a NID to HWC for the "Proposed redevelopment of the Stellenbosch University (Su) Tygerberg Campus, on Erf 24602, 18228 & 15394 (Parow), City Of Cape Town" and the HWC decision is dated Dec 2017. The 50m buffer was drawn around Erf 15394 (Hardekraaltjie Cemetery) as a precautionary buffer to subject any 'development' within this area to a Section 36 Application to ensure the sensitivity of the site is protected. At the time no detailed studies or research was undertaken on which the buffer was based. The irony is that "development" is not even under discussion. The point of this Section 36 Application is to undertake Memorialisation.</p> <p>All evidence points towards graves being located within the boundaries of the formal Hardekraaltjie Cemetery (Erf 15349) as determined by the SG Diagram boundaries of 1910, at least specifically regarding the north. The Hardekraaltjie cemetery is approximately 1.7ha in extent and will be preserved in its entirety in perpetuity should Memorialisation be undertaken. Furthermore, Erf 18228, a small erf, consisting of a number of possible grave targets as per GPR scan, to the west is a rational inclusion in the memorial area and therefore the total memorial area will be extended to over 2 hectares. The 50m buffer zone to the east, south and west remain considering no studies was undertaken to change this position and a 10m buffer zone to the north (on Erf 24602) is proposed as per this S36 process, which has undergone extensive</p>
--	--

		<p>research including GPR Scanning and Ground-truthing/ test excavations. No graves were found within the study area on Erf 24602 and there is no archaeological evidence to suggest that graves might occur there.</p> <p>The statement made: <i>“In all the public meetings and responses, participants including ourselves and from the university staff and students have consistently rejected any proposal that does not include the cemetery and burial ground within that buffer zone”</i> is incorrect for several reasons. Firstly, this is a misinterpretation of the responses from the campus community which have not all rejected the proposals. Secondly, it must be noted that all comments prior to these [this document] were based on the assumption that there were 6 potential grave targets within the 50m buffer zone (as indicated by the additional GPR scanning undertaken in 2024). Therefore, all comments prior to these were prior to the undertaking of the test excavations/ground-truthing of said targets. Since ground-truthing was undertaken, no graves were found within the study area on Erf 24602 and there is no archaeological evidence to suggest that graves might occur here. Lastly, as confirmed through ground-truthing the buffer zone to the north does not constitute the Cemetery or a burial ground.</p> <p>Memorialisation of the 2ha area will therefore afford the relevant justice.</p>
<p>2b</p>	<p>The narrative</p> <p>The Statement positions Stellenbosch University (SU) as the initiator of the memorialisation process. This is inaccurate, ethically problematic, and contrary to the NHRA, which recognises the rights of communities in heritage processes. Documentary and oral evidence shows that the Ravensmead community first contacted SU about the cemetery. By framing SU as the author of the process, the Statement erases our role as initiators.</p> <p>The University’s long history of institutional control over this landscape underscores this erasure. In 1971, when Dr. H. B. Thom declared that the Coloured community “Hulle sal baie verder moet vorder ...” 2 (would have to “progress much further” before being treated like white people), he articulated an openly race-essentialist ideology³, that systematically dehumanised the Coloured community that</p>	<p>The Heritage Statement is clear in outlining the way Memorialisation came about which includes key community members/ leaders as per below:</p> <p><i>“...in 2014, Mr. Daniel Dietrich informs the Dean of Stellenbosch University of his forebearers buried at Hardekraaltjie Cemetery. This act, undertaken by Daniel Dietrich, marks the catalyst for Stellenbosch University in terms of its era of restitution around the Hardekraaltjie Cemetery (page 21)”</i>. Between 2014 and 2019, various processes were initiated at an institutional level aimed at unravelling the story of the Hardekraaltjie burial grounds. This included ground penetration by a contracted consultancy. There was limited engagement at the time with the community.</p> <p><i>In 2019, the Faculty of Medicine and Health Sciences (FMHS) Dean’s Advisory Committee on Transformation proposed the formation of a Visual Redress Task Team, which was tasked to take responsibility for managing a restorative process linked to Hardekraaltjie. The main aim of the Task Team was to ensure that the SU’s strategic objectives of “setting things right” (redress), “making up for past wrongs” (compensation) and “removing potential causes of grievances or complaints and exacting repatriation” is met (SU Draft Visual Redress Policy, 2020). The purpose of the Task Team is furthermore to</i></p>

<p>still echoes in the way Hardekraaltjie has been treated. That same year, the University requested a known-coloured cemetery for use as a sports field for white students, treating graves as an inconvenience to be removed revealing a dehumanising attitude towards the dead. It consented to the removal of our ancestral bodies when it bought the property for 10 cents, still later unethically exhumed and dispersed ancestral remains, which it cannot account for possible in its animal collection. It converted the sacred and spiritual land into a sports field without consultation with the community. For over 45 years since 1971, it made no contact while continuing to play sports on our remaining "sub-humans" ancestors' remains even after Human rights was acknowledge and guaranteed to all citizens since 1994. Yet 2019 the university scientifically tested the 1971 hypothesis (guest which faculty?) which the community failed yet again! although they withdrew and apologised, institutionally it was approved. In 2025, another institutional decision, it reminded us of its original purpose, sports, running on the dead, a practice that continues and might constitutes heritage under S3(3)(a)(h), but should not override the Tiervlei community's cultural rights. A contested heritage site.</p> <p>These are not isolated incidents, it represents elements of the heritage significance of the site. The Statement treats the 1971 request as an isolated anomaly, ignoring the institutional ideology behind it which must be acknowledged in any proper Statement of Significance.</p>	<p><i>ensure that Hardekraaltjie is recognised as a formal historic burial site and in so doing, be guided by the principles of restorative justice.</i></p> <p><i>In October 2019, the FMHS led the way in expressing its commitment to change through the launch of the first faculty charter at the SU. Through its charter, the FMHS expresses its commitment to building an institutional culture that welcomes, celebrates and supports the development of a diverse body of students and staff. The faculty's specific commitment in the charter to acknowledge the lived experiences of the communities they serve and to engage with them respectfully has particular relevance in the context of Hardekraaltjie and the faculty's commitment to engaging with past injustices respectfully (page 22)."</i></p> <p><i>On the 1 June 2020 a community researcher, Chefferino Fortuin, initiated engagement with SU on behalf of his family and the community and in the same year SU establishes a Project Team focused on the memorialisation of the Hardekraaltjie Cemetery site. A Hardekraaltjie Steering Committee was formed which includes representatives of various stakeholders, including community members (Chefferino Fortuin and Johannes bastian) and representatives from Tygerberg Hospital, who met on a monthly basis. This led to the commencement of discussions and engagements between Tiervlei/Ravensmead community members and SU in 2021 with the first community engagement event regarding the memorialisation of the Hardekraaltjie Cemetery being held on Heritage Day (24 September 2021). In March 2022 the second community engagement between Tiervlei/ Ravensmead community members and Stellenbosch University is undertaken and, on the 12 December 2022, a third community engagement event is held at the Ravensmead Public Library (page 23)."</i></p> <p><i>The Hardekraaltjie Steering Committee oversaw a number of components:</i></p> <p><i>Research to make sense of some of the gaps – lead by Dr Handri Walters. Outcomes included:</i></p> <ul style="list-style-type: none"> <i>• Hardekraaltjie Cemetery: An Overview - Handri Walters, 2025</i> <i>• The beginning of a list of names of those buried at the cemetery</i> <p><i>Hardekraaltjie oral history</i></p> <ul style="list-style-type: none"> <i>• One of the outcomes of these engagements is the compilation of a book called "Landscapes of dispossession: Stories of the Hardekraaltjie Cemetery: Told by people from Tiervlei-Ravensmead", co-authored by Chefferino Fortuin & Marietjie Oelofse. Chefferino Fortuin & Johannes Bastiaan were paid as community researchers and the former for editing the book. The book launch was held in Ravensmead. All contributors were given a copy as well as the local schools & libraries - 100 copies were printed.</i>
---	--

- *A time-line banner was developed by the Steering Committee and this was handed over to the community members and is now the property of the Tiervlei-Ravensmead Erfenis Gemeenskap (represented by Chefferino Fortuin) and is used for educational purposes.*
- *Two information boards were compiled and erected at the Cemetery which was developed in conjunction with the Steering Committee (Including the community members: Chefferino and Johannes).*
- *Public Engagement*
 - *Various events held at campus and at the Ravensmead library prior to the official public participation in terms of the NHRA.*
 - *Campus engagement: A number of engagements were held with the staff and students of the campus to gather inputs to the process*
 - *Johannes Bastian was included in the conference at Rhodes University where a presentation of the work done was shared.*
 - *The decision to appoint PHS Consulting to undertake the formal heritage process in terms of the NHRA was discussed and supported by the Steering Committee.*
 - *In September 2024, in an initiative lead by the faculty, saw the handover of books and toys to the Early childhood facilities in Ravensmead – event held at the library.*
 - *As members of the Steering Committee, both Chefferino Fortuin and Johannes Bastian, received refunds for all direct expenses.*
 - *The Steering Committee was dissolved and PHS Consulting as the Heritage Practitioner was appointed to ensure an independent process is followed in terms of the NHRA.*

As Stellenbosch University is the Landowner and has/ will fund the initiatives around the Hardekraaltjie Memorialisation project to date, from a practical and administrative position, SU is the Applicant for all intents and purposes. Once again this is standard practice and by no means undermines the involvement from the community. The length of Public Participation undertaken pre and post PHS Consulting's involvement can attest to this – including the publication of the book: "*Landscapes of dispossession: Stories of the Hardekraaltjie Cemetery: Told by people from Tiervlei-Ravensmead*".

The ideologies of the Apartheid era are clearly wrong, and we stand united against such views today. We cannot erase the unexplainable atrocities of the Apartheid Regime, however we can move forward and work together to ensure that memorialisation is realised.

Page 42 – 46 of the Heritage Statement describes the acquisition of the Hardekraaltjie Cemetery and the discussions around exhumations. On 4 October 1972 Stellenbosch University bought the old Hardekraaltjie Cemetery site (surveyed Erf 15349) for the sum of ten (10) cents (subject to such conditions as referred to

		<p>in the Deed of Land dated 4 January 1910). However, the transfer of the site from Parow Municipality to Stellenbosch University was delayed and was eventually completed on 11 June 1974. The original intent for acquisition (converting the site into a sports field), continued to be pursued by the SU after the transfer of the site. This is indicated by the proposed plans for the site and its surrounds as captured in 1979 (Appendix A of the Heritage Statement).’ However, it must be understood that Erf 24602, within which the 50m buffer falls to the north, does not form part of this transaction, nor does it pertain to Erf 18228 to the west. The historical discussions around the acquisition of the Cemetery (for 10 cents), the potential exhumation of the graves and the conversion of the Cemetery into a sports field is regarding <u>Erf 15349 alone</u>. This is acknowledged and described in the Heritage Statement. Formal sports over the Cemetery (Erf 15349) were stopped after 2014 and bollards were eventually erected in 2020.</p> <p>Please refer to the attached document: “Stellenbosch University land acquisitions for the development of the Faculty of Medicine and Health Sciences campus, 1967-1974 written by Handri Walters (April 2026) to further substantiate this argument. [Annexure 1]</p> <p>We acknowledge in the Heritage Statement that: <i>“It is accepted that we will never know all the details surrounding the Hardekraaltjie Cemetery - for several reasons. However, continued research, discussions and engagement with the surrounding communities, stakeholders, students and Stellenbosch University have provided a platform for the continued evolution of the Hardekraaltjie Cemetery’s story. This will continue through the compilation and implementation of the proposed Conservation Management Plan and the Hardekraaltjie Memorial Management Committee.”</i></p>
<p>2c</p>	<p>Exclusion from co-creation and decision-making</p> <p>Our memory and community initiated this process. S3(3) (g) requires heritage assessment to recognise “the significance of the place to the community or communities to which it relates.” The Statement fails to do this which Smith (2006) calls the “authorised heritage discourse” where institutions determining what counts as heritage and how the past is narrated.</p> <p>The community, despite being the primary bearer of the site’s heritage significance with authorship rights in all heritage processes is treated as an “interested and affected</p>	<p>The community have been consulted extensively, prior to the formal heritage process and during the formal heritage process. Interested and Affected Party (I&AP) is merely the term used in an official process for the people who are consulted and who have an interest or would be affected in the matter. It is by no means a derogatory/ ‘less important’ term in any way and is used widely throughout the discipline. Please refer to ‘Section 10: Consultation and Participation’ which addresses ‘pre-application consultation’ undertaken since 2021 involving three (3) different engagements with the Tiervlie/Ravensmead community as well as the ‘in-application consultation’ undertaken by the appointed Heritage Consultants (PHS Consulting) from 2024 which has included three (3) Public Meetings to date (two of which have been held at the Ravensmead Public Library). In the interests of transparency/fairness, independent consultants are often best suited for official processes. Having the community run the process would be introducing bias.</p>

	<p>party”, consulted with comments in an appendix. This does not constitute co-authorship or shared decision-making. The CMP was drafted, presented to the paying client and released to the “interested and affected parties”. Without community input this is equivalent to arranging a funeral without consulting the bereaved family, which is not our custom or practice. The Heritage Memorial Management Committee has not been established, despite the long duration of this process.</p>	<p>The community was by no means excluded from the drafting of the CMP. The CMP was always to form part of the conditions of approval of the Memorialisation along with the establishment of the HMMC. After a consultation check-in meeting held on the 04 February 2026 (Annexure G7d), Chefferino Fortuin indicated that he would recommend that the Draft CMP be included in the next round of PPP so that the community could comment on the draft document upfront. Therefore, upon Chefferino Fortuin’s request the CMP was drafted upfront and included in the documentation circulated to the public for 30 days, and explained during the 3rd public meeting, to provide them with an opportunity to provide input and feedback upfront. It was made clear that the CMP is a <u>draft</u> document. Furthermore, it is standard practice that the CMP is drafted by a Professional Heritage Consultant who then provides all I&APs with an opportunity to provide comment/ input. The CMP also has to adhere to the requirements of the NHRA and HWC. [Note: No comment was received regarding any details of the CMP].</p> <p>Lastly, at the second public meeting (please refer to the Public Meeting Presentation (Annexure G5c)) in an attempt to be pre-emptive, steps were put in place to commence with the establishment of the HMMC. However, Chefferino Fortuin opposed the formation of the HMMC at the time as being premature and the HMMC formation was put on hold. We are happy to note that this sentiment has changed. The establishment of the HMMC will be a condition of approval of the memorialisation.</p>
<p>2d</p>	<p>Failure to recognise Intangible heritage and institutional bias</p> <p>The NHRA recognises intangible heritage, including oral history, living heritage, and cultural heritage, the spiritual and social significance of a place to the communities that relate to it. The recollections, grief, and ongoing connection of the Tiervlei community to Hardekraaltjie is the intangible heritage that drove this entire process. Our burial practices, mourning customs, and oral histories are protected. The community’s persistent memory of the cemetery, continued even when it was developed into a sportsfield, access denied, fenced, and graves were removed or destroyed, constitutes intangible cultural heritage that should be foregrounded in the Statement.</p>	<p>Intangible heritage is not protected by the NHRA because it cannot be destroyed but places associated with intangible heritage can be protected. This is exactly what we are trying to achieve through the Memorialisation of an Area.</p> <p>PHS Consulting has gone above and beyond to involve the community at every opportunity. We have held three (3) Public Meetings, had two (2) rounds of 30-day comment periods, afforded the community the opportunity to be present at the ground-truthing held over two (days) in which transportation and food parcels for the community were arranged for approx. 10 people that included some youth. Chefferino Fortuin and Johannes Bastian (as representatives of the Tiervlei-Ravensmead Erfenis Gemeenskap) have also been involved at numerous online check-in meetings to be kept in the loop of progress made along the way allowing them to ‘report back’ to the Community. The lengthy public participation process included in Appendix G can verify this. The length of the process to date and the studies commissioned can attest to the fact the comment received matters and results in actions and outcomes.</p> <p>Part of the purpose of consultation is to get community buy-in and by incorporating community views, they are participating in the decision-making. It is the nature of the process with independent consultants</p>

<p>The community is reduced to “interested and affected parties” and not co-authors of the process. Under the NHRA, consultation cannot substitute for shared decision-making, especially where the site is sacred. Furthermore, the desecration and dehumanisation were institutionally sanctioned, without regard for the community. The Statement replicates the very pattern of exclusion that gave rise to the evils at Hardekraaltjie.</p> <p>This document- our response as I&AP- in itself reflects this failure as it will be relegated as the previous to the appendix as proof of consultation but not community involvement in the decision-making process which is reserved for the consultant and its paying client the university.</p> <p>The justification of sports activities on a burial ground reflects the client’s interests, not a balanced assessment on the part of the heritage consultant. It relies on the Orton (2026) test excavation report to claim no graves exist outside the cemetery, without presenting the limitations of that report. It repeatedly asserts no proof of bones being removed or scattered, despite email evidence, Senate minutes suggesting otherwise, and an unaccounted percentage of bones in the Kirsten Skeletal Collection.</p>	<p>doing the formalities that requires the community to be I&APs. This is by no means affording them a lesser role. It is the formal way of bringing them in.</p> <p>It must be reiterated that Erf 24602, within which the 50m buffer falls to the north, does not form part of the historical Cemetery referred to as Erf 15349, nor does it pertain to Erf 18228 to the west. The historical discussions around the acquisition of the Cemetery (sold for 10 cents) and the conversion of the Cemetery into a sports field is regarding Erf 15349 alone. Furthermore, formal sports over the Cemetery (Erf 15349) were stopped after 2014 and bollards were eventually erected in 2020. The 50m buffer zone came about in November 2017 when Perception Planning submitted a NID to HWC for the “Proposed redevelopment of the Stellenbosch University (Su) Tygerberg Campus, on Erf 24602, 18228 & 15394 (Parow), City Of Cape Town”. The final decision from HWC is dated Dec 2017. Although no reference is made to the cemetery in HWC decision the NID made the following recommendation: “<i>That future <u>development</u> of Erven 15349, 18228 and land directly contiguous as illustrated in Figure 11 [Figure 1 below] in this report by dealt with as part of a Permit Application in terms of Section 36 of the National Heritage Resources Act, 1999 (Act 25 of 1999), which must include a public participation process and establishment of a Cultural Management Plan for the future conservation and management of the cemetery.</i>” The 50m buffer was drawn around Erf 15394 (Hardekraaltjie Cemetery) as a precautionary buffer to subject any ‘development’ within this area to a Section 36 Application to ensure the sensitivity of the site (Erf 15394) is protected. At the time no detailed studies or research was undertaken on which the buffer was based. The irony is that “development” is not even under discussion. The point of this Section 36 Application is to undertake Memorialisation.</p>
--	--



Figure 1: The area delineated in yellow polygon to be treated as a 50m Buffer Area as imposed through HWC's decision dated 7th August 2017. **Development within the 50m Buffer Area would trigger a Permit application in terms of Section 36 of the NHRA.** Red polygon represents portion of land owned by University of Stellenbosch (Perception Planning, 2017).

Furthermore, to determine the buffer area required on Erf 24602, and to determine whether any graves are located within the buffer zone, GPR Scanning was undertaken within the study area and beyond to determine if any anomalies are present. The GPR study indicated 6 potential grave targets within the area. A ground-truthing permit was requested and approved by HWC for Jayson Orton to undertake the test excavations of the potential grave targets under community observation. The test excavations concluded that no graves are located at any of the 6 targets indicated in the GPR Scanning. Jayson Orton is an independent accredited professional and on the basis of the outcome of his report (in addition to all the information and research undertaken prior to his report), it was determined that the 50m buffer (in the north) can be reduced, as: "It is considered highly unlikely that burials occurred outside of the known historical Hardekraaltjie Cemetery, and it is recommended that this portion of Erf 24602 should not be considered as potentially being part of the historic cemetery."

		<p>Therefore, the statement: "<i>The justification of sports activities on a burial ground reflects the client's interests, not a balanced assessment on the part of the heritage consultant</i>", is incorrect. Firstly, the 50m buffer zone is not considered a "burial ground". Considering all the research, studies and information gathered to date, sterilising the 50m buffer area to the north cannot be justified and the proposed 10m buffer imposed to the north, is indeed "a balanced assessment on the part of the heritage consultant".</p> <p>The heritage statement states that: "<i>There have been rumours of bones being found within the Hardekraaltjie Cemetery area post the 1970s. An investigation was launched into the claim of bones being found within the SU Tygerberg Campus up to present and no such bones have been discovered. A recent inventory at the Kirsten Skeletal Collection on the US campus did not identify any bones rumoured to be found in the study area. Although it cannot be said with certainty that there were any bones discovered it also cannot be confirmed. This is therefore speculation at this point as no evidence has presented itself at this point to indicate otherwise.</i></p> <p><i>The only known 'bones' found, at this stage, is a cranium discovered in a flower bed in 2021. HWC was contacted immediately, and a subsequent study was undertaken of a wider area by Dr Jayson Orton in April 2021, however no further bones were found. It can be assumed that this human bone is most likely from the historical burials undertaken at Hardekraaltjie and was displaced at some point as a result of earthmoving activities decades ago. The discovery of bones, past and present, will be addressed in the proposed Conservation Management Plan."</i></p>
<p>2e</p>	<p>The Statements failure to meet NHRA S3(3) criteria</p> <ul style="list-style-type: none"> - The importance in South Africa's history which insufficiently addresses the context of the university's relationship with the Hardekraaltjie's acquisition and conversion. - The potential to yield information about cultural heritage which was suppressed for more than 45 years and almost destroyed by 1970s earthmoving. - The strong association with a community for social, cultural or spiritual reasons which is acknowledged only in general terms, without specificity. <p>It also fails to engage with whether remains from Hardekraaltjie are held in the Kirsten Skeletal Collection.</p>	<p>Section 6 refers to the 'History and Evolution of the Site and Context: Hardekraaltjie' which includes discussion around the acquisition of the Hardekraaltjie Cemetery, Stellenbosch Universities involvement as well as who was buried there and what communities are associated with the Hardekraaltjie Cemetery. It is also accepted that we will never know all the details surrounding the Hardekraaltjie Cemetery - for several reasons. However, continued research, discussions and engagement with the surrounding communities, stakeholders, students and Stellenbosch University have provided a platform for the continued evolution of the Hardekraaltjie Cemetery's story. This will continue through the compilation and implementation of the proposed CMP and the Hardekraaltjie Memorial Management Committee (HMMC).</p> <p>The draft Conservation Management Plan states: "<i>The Hardekraaltjie Cemetery is largely a testament to the lives and deaths of marginalised residents affected by colonial and apartheid spatial policies. It is a focal point for heritage restitution, community memory and inclusive commemoration. The Hardekraaltjie Cemetery is of high cultural, social, and historical significance due to:</i></p>

	<p>Prof. Page’s 2017 email confirms his predecessor collected remains from the site and “locked away in an ossuary.” With 14.6% of the Collection from unknown sources, the university cannot credibly assert that no Hardekraaltjie bones were incorporated.</p>	<ul style="list-style-type: none"> • <i>Its association with displaced communities as a result of forceful removals and apartheid planning;</i> • <i>Its role as a site of memory, dignity, and ancestral heritage with strong spiritual beliefs surrounding burials/ a final resting place; and</i> • <i>Its embodiment of apartheid-era injustice and spatial violence which has a deep meaning for descendant and displaced communities.”</i> <p>The importance and significance of the Hardekraaltjie Cemetery within South Africa’s History is not disputed and the nomination of a PHS grading for Erven 15349 and 18228 is supported.</p> <p>The heritage statement states that: <i>“There have been rumours of bones being found within the Hardekraaltjie Cemetery area post the 1970s. An investigation was launched into the claim of bones being found within the SU Tygerberg Campus up to present and no such bones have been discovered. A recent inventory at the Kirsten Skeletal Collection on the US campus did not identify any bones rumoured to be found in the study area. Although it cannot be said with certainty that there were any bones discovered it also cannot be confirmed. This is therefore speculation at this point as no evidence has presented itself at this point to indicate otherwise.</i></p> <p><i>The only known ‘bones’ found, at this stage, is a cranium discovered in a flower bed in 2021. HWC was contacted immediately, and a subsequent study was undertaken of a wider area by Dr Jayson Orton in April 2021, however no further bones were found. It can be assumed that this human bone is most likely from the historical burials undertaken at Hardekraaltjie and was displaced at some point as a result of earthmoving activities decades ago. The discovery of bones, past and present, will be addressed in the proposed Conservation Management Plan.”</i></p> <p>There is ongoing engagement in respect of the Kirsten Skeletal Collection (KSC) as a separate matter. It must be noted that the individuals of unknown origin are currently in storage at the Division of Clinical Anatomy. These remains are not stored in the KSC and therefore not available for research. At present there is no connection between the ‘unknown’ individuals with the Hardekraaltjie Cemetery. However, investigations in this regard are ongoing. Should anything new arise in future this is a matter that can be addressed through the Conservation Management Plan by the HMMC.</p>
<p>2f</p>	<p>The Orton (2026) test excavation</p> <p>The reliance on this report is not reasonable on methodological or evidential grounds. The 6 excavations</p>	<p>To determine the buffer area required on Erf 24602, it was essential to determine whether any graves are located within the buffer zone, GPR Scanning was undertaken within the study area and beyond to determine if any anomalies are present. In addition, aerial imagery, historical research and oral history was</p>

<p>constitute less than 1% of the buffer zone. Such a small sample cannot support definitive conclusions. Only one surveyed marker per test site was used and material could have been missed by centimetres.</p> <p>GPR limitations are not addressed which performs poorly on thin wooden coffins, blanket burials, and infant/child remains. Scheepers Strydom (1981) "a superior Afrikaner intellectual human" refers to the 1918 pandemic wood shortage when adults and children were buried in blankets. Hardekraaltjie with high infant mortality; Prof. Page noted "a large number of small gravesites" (email, 25 April 2017). The probability that remains fall below GPR detection is substantial which Dr. Webley who the reports reference agrees with.</p> <p>Recognise the destruction of the cemetery as heritage harm, where earthmoving could have disturbed or destroyed remains. Multiple sources (2015 email, Council and Senate minutes, Oelofsen & Fortuin 2024 oral histories) confirm bulldozers opened graves and left bones scattered. The incorrect geographical identification of the cemetery's location as explained in the response to the Orton (2026) report.</p> <p>The report is inconclusive due to the small sample, the findings draw incorrect spatial assumptions and the omission of relevant historical literature in addition to the desecration and selective institutional memory. Section 36, obligation to protect is not depending on "proof" of remains, but on the S3(3) heritage significance of the site. Especially where the university has desecrated and discarded part of the evidence.</p>	<p>also considered and assessed. Therefore, Orton's report was not and cannot be considered in isolation and therefore the "1% of the buffer zone" reference is unfounded in that the GPR scanning first took place to determine the "most-likely" grave targets as a result of anomalies picked up on the scans. The GPR study indicated 6 potential grave targets of high confidence within the area. A ground-truthing permit was requested and approved by HWC for Jayson Orton to undertake the test excavations of the potential grave targets under community observation. The test excavations concluded that no graves are located at any of the 6 targets indicated in the GPR Scanning. Furthermore, Orton's methodology and the rationale of ground-truthing the 6 potential grave targets was communicated to all I&APs (Public Meeting 2 Presentation (Appendix G5c)) and additionally to Chefferino Fortuin and Johannes Bastian (Meeting Notes G4b) at which time no objections were raised.</p> <p>Furthermore, according to Dr. Jayson Orton: <i>"It must be understood that wood seldom preserves. We most often see a stain in the sand. The GPR is not "looking" for wood. It is looking for "anomalies", that is, any inconsistency in the ground. This is essentially a change in density compared to the surrounding area. In the case of a grave, such a change is because the original compact sand is excavated when a grave is made and the backfilled grave shaft has slightly lower density – this lower density would be picked up by the GPR. The experts in GPR analysed their results and tried their best to determine which anomalies looked the most like graves. While it is true that something could be missed by a few cm in the ground while excavating, it should be noted that grave shafts are larger than coffins which slightly reduces the chances of missing them. However, importantly, is that zero positive results were obtained at ALL 6 tested localities. If some had yielded graves then we could question whether the others had missed nearby graves, but the most parsimonious reading of the results is that no graves were found because none occurred at those 6 locations."</i></p> <p>The way the cemetery was handled in the past is undoubtedly wrong and is not disputed, however a balanced way forward is required, and the research and studies undertaken to date provide a way forward.</p> <p>With reference to the comment: "Prof. Page noted "a large number of small gravesites" (email, 25 April 2017)". Again, we need to understand that whether the Hardekraaltjie Cemetery (Erf 15394) itself consisted of graves – is not disputed. Historical aerial imagery defines the boundaries of the Hardekraaltjie Cemetery (Erf 15394) to coincide with the 1910 SG Diagram.</p> <p>We assume the reference to <i>"incorrect geographical identification of the cemetery's location"</i> refers to Figure 25 (Orton, 2026). This Figure shows an extract from a 1941 topographical map in which it appears</p>
---	--

		<p>the Cemetery is incorrectly located. Imagery hereafter is corrected with the 1945 topographical map showing the Hardekraaltjie Cemetery in the correct position. However, this does not change the outcome of the report which found that the Cemetery was located in an elevated position, with the area to the north forming part of the Elsie's River floodplain but most importantly, that no graves were found at any of the 6 grave targets identified by the GPR Scanning.</p>
<p>2g</p>	<p>Requirements for community agreement, which has not been met.</p> <p>As descendants of those interred at Hardekraaltjie and representatives of the Tiervlei/Ravensmead community (S36 of NHRA), our agreement is conditional on</p> <ol style="list-style-type: none"> 1. Memorialisation of Erf 15349, Erf 18228, and the buffer portion on Erf 24602 (the 50 m buffer zone). 2. Revision of the Statement of Significance to accurately reflect the community's role as initiator, honouring our community who kept the cemetery alive in memory. 3. Revision of the Statement of Significance to accurately reflect the university's ideological relationship with the community interred at Hardekraaltjie its acquisition and conversion. Secondly what are the institution apologising for and willing to do for restitution? 4. Establishment of the Hardekraaltjie Memorial Management Committee. 5. The CMP co-authored by the community, not drafted by the consultant and the University and merely presented for comment. 	<ol style="list-style-type: none"> 1. A Permit Application [HWC25102803SB1113] was lodged and approved by HWC for the ground truthing as proposed in the application by Dr Jayson Orton. This approval came after all I&APs were made aware of the proposed methodology at the 2nd Public Meeting and no objections were raised resulting in the ground truthing going ahead. After approval was obtained from HWC ground truthing took place over two days which included community observation and interaction throughout. The purpose of Archaeologist Dr. Jayson Orton's test excavations, as indicated in his report ("Permit Report: Test Excavations on Erf 24602 Parow (University of Stellenbosch Tygerberg Campus), Western Cape") (Annexure K) was to determine whether the adjacent Hardekraaltjie Cemetery (Erf 15349) may once have extended onto Erf 24602 as indicated in the 2024 GPR scan which revealed a number of potential grave targets at varying depths. The six that were earmarked in the study to have the greatest likelihood of being graves was selected for ground truthing. The locations of these six targets were surveyed and marked on site. Test trenches were then excavated diagonally immediately adjacent to each of these locations. No evidence for burials was located at any of them. The excavations showed fill to varying depths of between 0.4 m and in excess of 1.4 m. It is evident that this was brought into level a naturally undulating surface in order to create the playing fields. This variable fill, the lack of fill in the known cemetery, and the evidence from historical mapping indicated in this study regarding the alignment of the Elsie's River, suggests that burial did not occur in the study area. <p>It was concluded that: <i>"It is considered highly unlikely that burials occurred outside of the known historical Hardekraaltjie Cemetery [within the study area to the north], and it is recommended that this portion of Erf 24602 should not be considered as potentially being part of the historic cemetery."</i></p> <p>The 50m buffer zone came about in November 2017 when Perception Planning submitted a NID to HWC for the "Proposed redevelopment of the Stellenbosch University (Su) Tygerberg Campus, on Erf 24602, 18228 & 15394 (Parow), City Of Cape Town" and the HWC is dated Dec 2017. The 50m buffer was drawn around Erf 15394 (Hardekraaltjie Cemetery) not because the area was confirmed as a burial site but as a precautionary buffer to subject any 'development' within this area to a Section 36 Application to ensure the sensitivity of the site is protected. At the time no detailed studies or research was undertaken on which</p>

the buffer was based. The irony is that "development" is not even under discussion. The point of this Section 36 Application is to undertake Memorialisation.

The Hardekraaltjie cemetery is approximately 1.7ha in extent and will be preserved in its entirety in perpetuity should Memorialisation be undertaken. Furthermore, Erf 18228 to the west will also be included in the memorial area and therefore the total memorial area will be extended to over 2 hectares. The 50m buffer zone to the east, south and west remains because there is no S36 process to ground truth the extent of the buffer. Based on the additional research and studies undertaken on Erf 24602 and the outcome thereof it was recommended that the 50m buffer could be reduced. No graves were found within the study area on Erf 24602 and there is no archaeological evidence to suggest that graves might occur there. The 10m buffer proposed is required to protect the interface around the Memorial area and facilitate access and pedestrian flow into the cemetery. Considering all the research, studies and information gathered to date, sterilising the 50m buffer area to the north cannot be justified and the proposed 10m buffer imposed to the north, is considered "a balanced assessment on the part of the heritage consultant".

2. Section 3 of the Heritage Statement addresses the 'Background: Concept of Memorialisation & Why Hardekraaltjie?'. This section identifies the key role players in the community that played a role in bringing about memorialisation. Please refer to our response to 2a above.

3. The Heritage Statement describes the historical context as best as possible throughout, with Section 6 referring to the 'History and Evolution of the Site and Context: Hardekraaltjie' which includes the discussion around the potential of historical exhumation and acquisition of the cemetery by SU from Parow Municipality. The draft Conservation Management Plan states: "*The Hardekraaltjie Cemetery is largely a testament to the lives and deaths of marginalised residents affected by colonial and apartheid spatial policies. It is a focal point for heritage restitution, community memory and inclusive commemoration. The Hardekraaltjie Cemetery is of high cultural, social, and historical significance due to:*

- *Its association with displaced communities as a result of forceful removals and apartheid planning;*
- *Its role as a site of memory, dignity, and ancestral heritage with strong spiritual beliefs surrounding burials/ a final resting place; and*
- *Its embodiment of apartheid-era injustice and spatial violence which has a deep meaning for descendant and displaced communities."*

No one is trying to justify or hide the wrongs of the past. The atrocities that resulted from the Apartheid era are inexplicable in today's world. SU has embarked on this journey of Memorialisation as a form of restitution.

		<p>4. The concept of the Hardekraaltjie Memorial Management Committee (HMMC) was put forward to all I&APs at the 2nd public meeting in which an invitation was circulated to approximately 70 I&APs with the intention of the meeting to, amongst others, provide "<i>further feedback/ clarity, obtain additional feedback on the aspect of ground-truthing & memorialisation as well as initiating the formation of the 'Hardekraaltjie Memorial Management Committee' (Appendix G7a)</i>". Chefferino Fortuin opposed the formation of the HMMC at the time as being premature.</p> <p>We are happy to note that this sentiment has changed. The establishment of the HMMC will be a condition of approval of the memorialisation.</p> <p>5. After a consultation check-in meeting held on the 04 February 2026 (Annexure G7d), Chefferino Fortuin, as the representative for the <i>Tiervlei-Ravensmead Erfenis Gemeenskap</i>, indicated that he would recommend that the Draft CMP be included in the next round of PPP so that the community could comment on the draft document upfront. We agreed to include a draft version of the CMP, for input by the community, during the 30-day comment period which was also discussed at the 3rd public meeting. Furthermore, it is standard practice that the CMP is drafted by a Professional Heritage Consultant who then provides all I&APs with an opportunity to provide comment/ input. The CMP also has to adhere to the requirements of the NHRA and HWC.</p> <p>[Note: No comment was received regarding any details of the CMP].</p>
<p>2h</p>	<p>Conclusion</p> <p>This is a layered landscape of memory, sacred significance and a reminder of apartheid-era institutional evils. Restrictions as to which parts are accessible for memorialisation and which bodies are more sacred will take us back to ethnic and spatial apartheid notions⁷. It is a nominated Provincial Heritage Resource (PHS). The cemetery and burial ground are illustrative of land absorbed into an apartheid spatial plan and separated across three public institutions (Transnet, Stellenbosch Medical Campus and Tygerberg Hospital) and the tension with the university over whose heritage matters. The cemetery and burial ground versus running on the dead,"</p>	<p>Nobody is questioning which bodies are more sacred. All evidence points towards graves being located within the boundaries of the formal Hardekraaltjie Cemetery (Erf 15349) as determined by the SG Diagram boundaries of 1910, at least specifically with regard to the north. GPR Scanning and Test excavations have been undertaken to the north and no evidence of graves have been found. The 50m buffer area (which is what Chefferino refers to as the 'burial ground') was an administrative line drawn, in 2017, around the formal Hardekraaltjie Cemetery, to ensure that the heritage resource is buffered and protected against future 'development' by enforcing that a Section 36 process is to be followed within this space. The 'development' being referred to in this application is the memorialisation of a space to ensure the long-term protection of said Heritage Resource. No 'development' is even under discussion here.</p> <p>The Section 27 PHS Nomination was initiated by Chefferino Fortuin and HWC agreed that the extent of the PHS and outcome thereof will be determined by this Section 36 Application process. The Section 36 Application founded that the site (Erf 15349 & Erf 18228) is considered to be of High Local to Provincial</p>

	SU treating ancestors as "sub-humans". We urge the HWC committee to impose conditions including the 50 m buffer zone, to ensure this heritage process delivers the justice and human rights that communities were denied in the past by legislation and the university but are afforded now under the NHRA.	Heritage Significance (Grade IIIA / potential Grade II). A Grade II Grading would be supported for Erf 15349 & Erf 18228. However, no graves were found in the buffer zone on Erf 24602 and there is no archaeological evidence to suggest that graves might occur there. Erf 24602 thus does not have any particular heritage significance and, from an archaeological perspective, does not merit grading (Orton, 2026).
I&AP: Mr. Johannes Bastian & Valencia Bastian – 13 April 2026		
3	We do not oppose memorialisation in principle, but we reject the manner in which this heritage process has been conducted, the framing of the Heritage Statement, and the exclusion of our community from co-creation in the Draft Conservation Management Plan. We reject the exclusion of the 50 m buffer zone from the memorialisation area, which serves the applicant's interests rather than protecting our spiritual and sacred heritage resource which are included in a Provincial Heritage Resource (PHS) nomination. In all the public meetings and responses, participants including ourselves and from the university staff and students have consistently rejected any proposal that does not include the cemetery and burial ground within that buffer zone. We urge the University or HWC committee to impose conditions including the 50 m buffer zone, to ensure this heritage process delivers the justice that the Khoi, San, mixed-race, slave, and African communities were denied in the past but are afforded now under the NHRA.	This is a repeat of comment 2a above. Please refer to our response to point 2a above.
I&AP: Daniël. J. Dietrich – 13 April 2026		
4	Graag versoek ek.dat ,diè gekoopte, grond vir EEN RAND van Parow Munisipality, wat later gedien het as sports gronde,"NIE AAN geraak, of verklein moet nie! M.a.w die	Noted and agreed. On 4 October 1972 Stellenbosch University bought the Hardekraaltjie Cemetery (Erf 15349) for the sum of ten cents (subject to such conditions as referred to in the Deed of Land dated 4 January 1910). However, the transfer of the site from Parow Municipality to Stellenbosch University was

<p>begrafplaas,nml. Haardekraaltjie MOET HOEGENAAMD NIE, onder g'n omstandighede, VERKLEIN WORD NIË! Begrafplaas was vir EEN Rand van Parow Municipality gekoop en dit om as Sports Gronde te benut! What a HYIENIES Crime from the DEEP PIT OF UnHumanity, also for self-enrichment, "ONE RACE playing it of against another, yeah a voiceless, peaceful group of Humans like every human being! Please, as a former employer of Said Institute, back down! As such in future reference, you'll be victorious! Standing Tall, riding the waves of Humanity! Wat ek mee beginne het,met die storie,was vir my oorle' ma, want sy het haar Pa nie geken nie,hy is kort voor haar geboorte oorlede en te Haardekraaltjie Begraafplaas te ruste gelaat! My oorle Ma het nie haar Pa geken nie,hy is oorlede voor haar geboorte,talle maal het ek.haar gekry ,met die.foto.,tyd net daarna gestaar! Al wat sy.altyd.gesè het,wS "HIER WAS pappie.baie siek. Ek't dit goed gedink om 'n gedig.aan haar.toe.te.dig,op te dra!Ek haal dit aan! <i>OOh Pappie My Pappie.</i> <i>Glad nie het sy vir hom geken so ook nie hy dalk vir haar daarom net die foto</i> <i>wat sy van hom bewaar</i> <i>vir haar so kosbaar</i> <i>en dierbaar</i> <i>Wanneer sy dit met</i> <i>al twee hande neem</i> <i>altyd gesè hetsagkens</i> <i>hier was Pappie baie siek</i> <i>watse siekte het sy nooit genoem dalk het sy hom siekte verbloem om haar verlange te noem Ooh Pappie My Pappie</i> <i>Ooh Pappie ons Pappie!</i></p>	<p>plagued by delays and was eventually completed on 11 June 1974. The original intent for acquisition (converting the site into a sports field), continued to be pursued by the SU after the transfer of the site. This is indicated by the proposed plans for the site and its surrounds as captured in 1979 (Appendix A of the Heritage Statement).' However, it must be understood that Erf 24602, within which the 50m buffer falls to the north, does not form part of this transaction, nor does it pertain to Erf 18228 to the west. The historical acquisition of the Cemetery (for 10 cents) is regarding Erf 15349 alone which is the SG Diagram drawn in 1910 defining the boundaries of the Hardekraaltjie Cemetery. The Hardekraaltjie cemetery is approximately 1.7ha in extent and will be preserved in its entirety in perpetuity should Memorialisation be undertaken. Furthermore, Erf 18228 to the west will also be included in the memorial area and therefore the total memorial area will be extended to over 2 hectares. The 50m buffer zone to the east, south and west remain and a 10m buffer zone to the north (on Erf 24602) is proposed, which has undergone extensive research including GPR Scanning and Ground-truthing/ test excavations. No graves were found within the study area on Erf 24602 and there is no archaeological evidence to suggest that graves might occur there. In summary, the Hardekraaltjie Cemetery will not be reduced in size – in fact it will be enlarged through the proposed Memorialisation.</p>
---	--

I&AP: Jeanette Andrew's - 13 April 2026		
5	The 50-meter buffer must be included. I do not agree in the way the university propose without the community agreement. Who decide who is buried outside and who is inside. Our families is buried here before the university came. Please don't separate our family's again.	<p>Once again, it must be reiterated that Erf 24602, within which the 50m buffer falls to the north, does not form part of the historical Cemetery referred to as Erf 15349, nor does it pertain to Erf 18228 to the west. The historical discussions around the acquisition of the Cemetery (for 10 cents) and the conversion of the Cemetery into a sports field is regarding Erf 15349 alone. The 50m buffer zone came about in November 2017 when Perception Planning submitted a NID to HWC for the "Proposed redevelopment of the Stellenbosch University (Su) Tygerberg Campus, on Erf 24602, 18228 & 15394 (Parow), City Of Cape Town". The final decision from HWC is dated Dec 2017. Although no reference is made to the cemetery in HWC decision the NID made the following recommendation: <i>"That future development of Erven 15349, 18228 and land directly contiguous as illustrated in Figure 11 in this report by dealt with as part of a Permit Application in terms of Section 36 of the National Heritage Resources Act, 1999 (Act 25 of 1999), which must include a public participation process and establishment of a Cultural Management Plan for the future conservation and management of the cemetery."</i> The 50m buffer was therefore a precautionary administrative buffer imposed around the historical cemetery to subject any 'development' within this area to a Section 36 Application to ensure the sensitivity of the site is protected. The irony is that "Development" is not even under discussion here. The point of this Section 36 Application is to undertake Memorialisation.</p> <p>Nobody is questioning which bodies are more sacred or trying to separate graves. All evidence points towards graves being located within the boundaries of the formal Hardekraaltjie Cemetery (Erf 15349) as determined by the SG Diagram boundaries of 1910, at least specifically regarding the north.</p> <p>The Hardekraaltjie cemetery is approximately 1.7ha in extent and will be preserved in its entirety in perpetuity should Memorialisation be undertaken. Furthermore, Erf 18228 to the west will also be included in the memorial area and therefore the total memorial area will be extended to over 2 hectares. The 50m buffer zone to the east, south and west remain and a 10m buffer zone to the north (on Erf 24602) is proposed, which has undergone extensive research including GPR Scanning and Ground-truthing/ test excavations. No graves were found within the study area on Erf 24602 and there is no archaeological evidence to suggest that graves might occur there.</p>
I&AP: De Villiers Royal House Chief Albert De Villiers – 13 April 2026		
6	I have attended the meeting on 24 March at the library regarding our graveyard and burial grounds of our Khoi and San ancestors. We do not agree with the apartheid exclusion and separation of graves. We want the cemetery and 50-meter buffer memorialised and part of the heritage status. We agree that it must be memorialised but not in the way the university propose without the community in all the steps and not meetings where the consultant come and present and we must agree. We do not agree with the plan but with the erfenis community. We are the first nation first here before the university.	
I&AP: Jurie Dietrich – 13 April 2026		
7	Ek staan by my besluit wat ek geneem het in die laaste vergadering by die Ravensmead biblioteek, dat daar moet nie van die gedeelte van die rugby veld afgestaan word vir die Universiteit vir Rugby nie. Ek staan by my besluit wat ek daar gegee get. Ons gaan dit nie toelaat dat die Univeristeit nog van ons grond wat waar ons geliefdes begrafe is nie.	

Annexure 1

Stellenbosch University land acquisitions for the development of the Faculty of Medicine and Health Sciences campus, 1967-1974

Handri Walters

April 2026

This historical narrative provides an overview of the acquisition of land by Stellenbosch University for the development of a medical campus during the 1960s and 1970s with emphasis on the individual erven acquired by the university and its current relevance as related to the memorialisation of the historic Hardekraaltjie cemetery site (Erf 15349). What is illustrated in this narrative is that three separate erven were acquired by the university to develop their campus:

- Erf 15348 ('Portion 27, a portion of portion 19 of the farm Belhar') acquired in 1967;
- Erf 14299 ('Lot Med') acquired in 1967;
- Erf 15349 ('Hardekraaltjie Cemetery') bought in 1972 and transfer of title deed completed in 1974.
- Erf 18228 (bordering the Hardekraaltjie cemetery site to the west) was surveyed in 1981, but the origin of this designated site remains unclear (as noted in a previous heritage impact assessment by Perception Planning [2017]).

Erven 15349 and 14299 were later amalgamated into a single unit referred to as Erf 24602, while the cemetery site (Erf 15349) remained a separate entity.

The historic Hardekraaltjie cemetery site (Erf 15349) was surveyed and beaconed by J.K. van O. Duminy in February 1909. This site was used as a cemetery from 1910 to 1947 when it was closed due to the development of a large marshalling yard (used by South African Railways) to the east of the cemetery. When the cemetery site was surveyed in 1909, it was surrounded by the Hardekraaltjie Forest Reserve which was under the management of the Crown until the establishment of the Union in 1910 (see image 1 below). However, after the establishment of the Union, and specifically in the 1920s and 1930s as local urban development encroached, parts of the Forest Reserve were sold to private landowners – including much of the land surrounding the Hardekraaltjie cemetery site. A large section was also used by the government for the establishment of the marshalling yard. However, the cemetery site (Erf 15349) remained a separate entity in the Cape Divisional Council until its transfer to Parow Municipality in 1971. Thereafter the site was sold to Stellenbosch University for 10 cents (as noted in the deed of transfer) with the transfer of deed finalised in 1974.

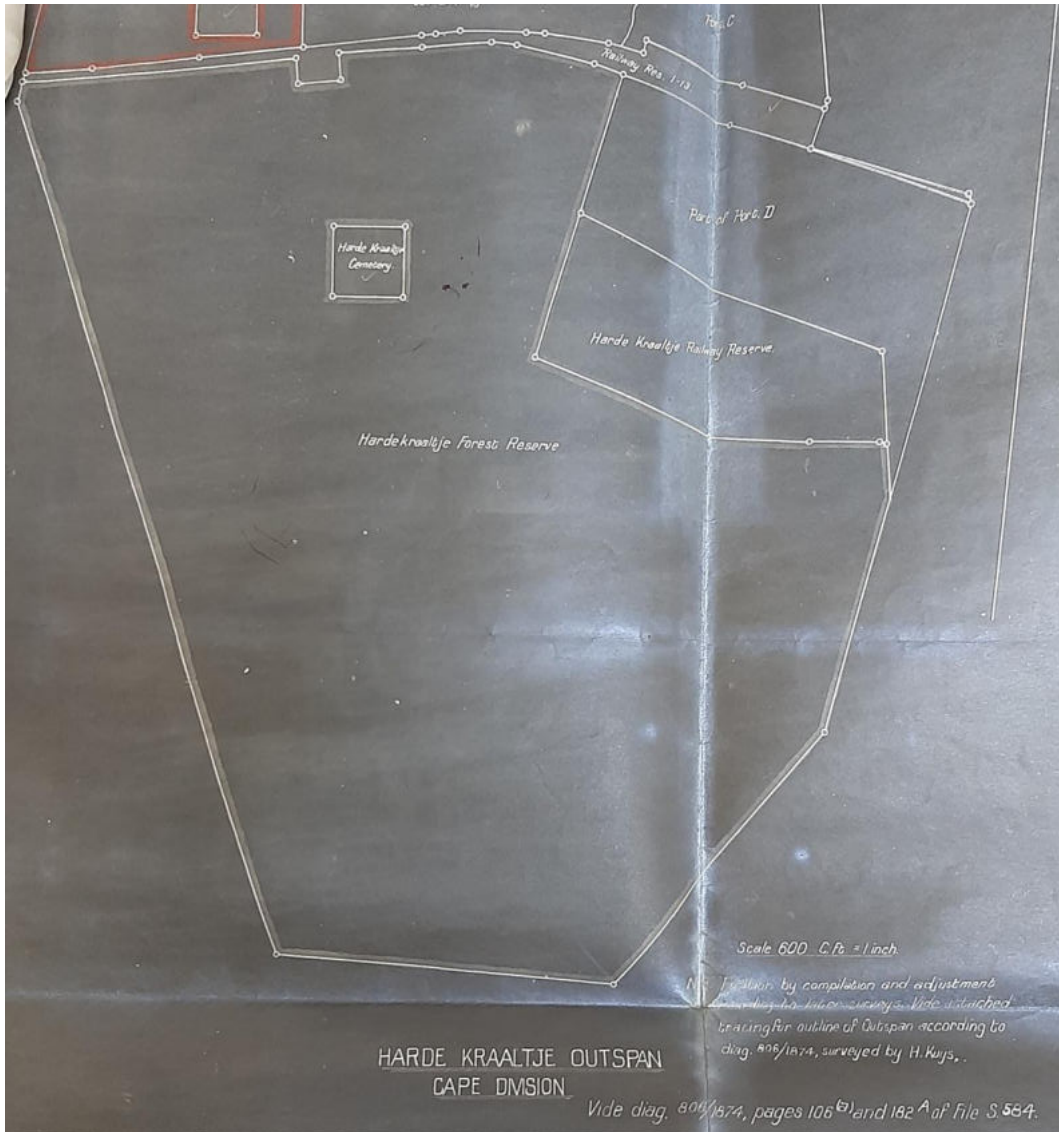


Image 1: This image shows a map of the Hardekraaltjie Outspan in the Cape Division as retrieved from the National Archives in Cape Town. The map provides a representation of the Hardekraaltjie cemetery within the Hardekraaltjie Forest Reserve. The image represents the forest reserve before the land was disposed of for government use (creation of a marshalling yard) and private landowners from the 1930s onwards.

The acquisition of Erf 15349 (Hardekraaltjie cemetery) by Stellenbosch University was preceded by other land acquisitions by the university for the establishment of a ‘medical campus’ adjacent to Tygerberg Hospital. In this regard, the university had purchased Erven 15348 (otherwise referred to as ‘Portion 27, a portion of portion 19 of the farm Belhar’) and 14299 (‘Lot Med’) in 1967.¹ These erven, of which 15348 is bordering the northern side of the cemetery, is illustrated in image 2 below. Erf 15348 (‘Portion 27, a portion of portion 19 of the farm Belhar’), as acquired by the university in 1967, became the designated site for student recreational activities. This included the establishment of a rugby/soccer field, and later tennis/basketball courts.

¹ Portion 19 of the farm Belhar was withdrawn from the Hardekraaltjie Forest Reserve in 1946 for the proposed development of a ‘native location.’ However, this proposal never came to fruition due to resistance from the local Bellville residents. The land was ultimately disposed of for other uses government uses and private ownership.

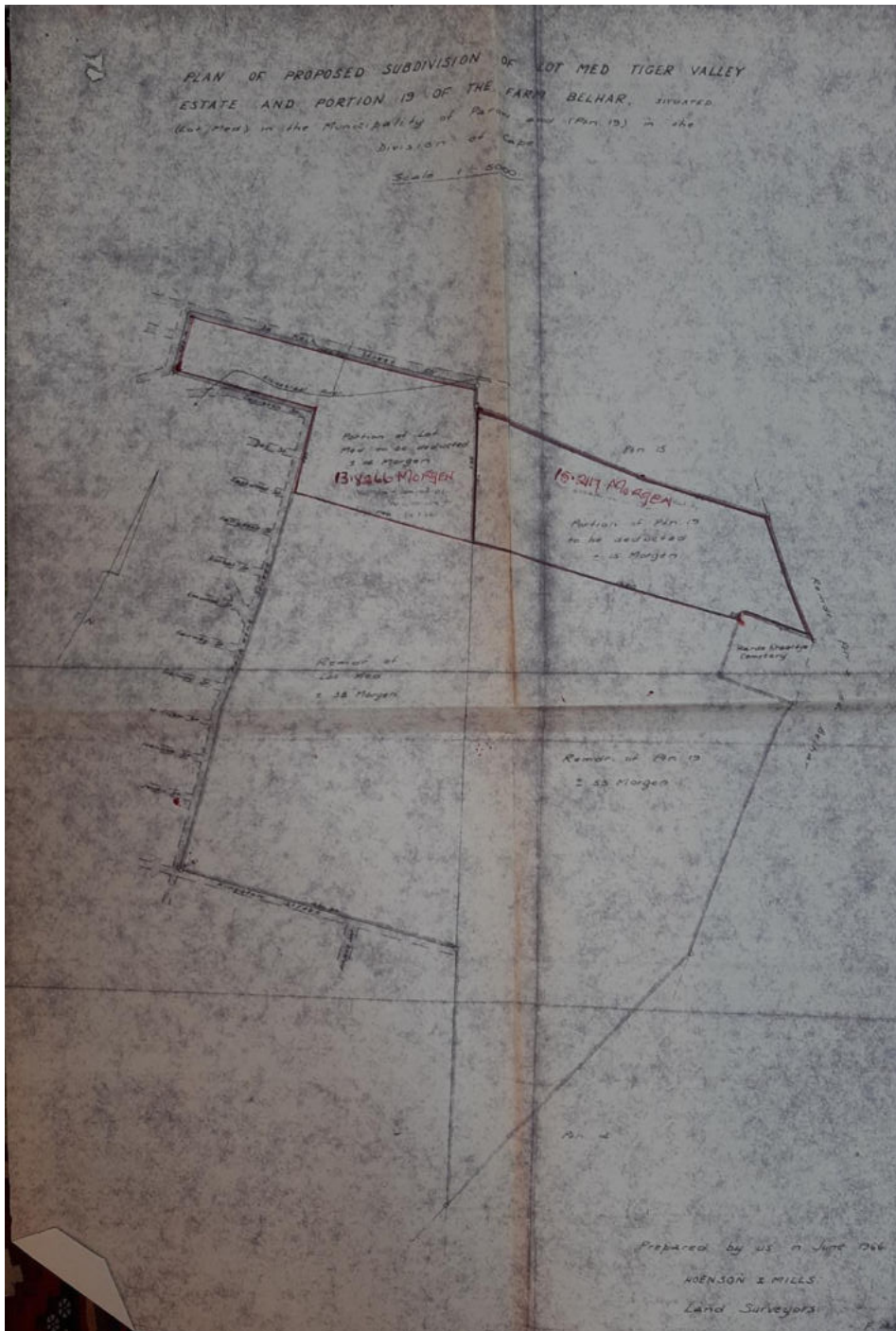


Image 2: This image, titled ‘Plan of proposed subdivision of Lot Med Tiger Valley Estate and Portion 19 of the farm Belhar’, was retrieved from the Stellenbosch University Archives. It represents the division of land after the disposal of forest reserve land, and at the time of the development of the Tygerberg Hospital complex and the ‘medical campus’ for Stellenbosch University. The image was meant to highlight the two properties acquired by the university in 1967 as adjacent to the land on which the hospital was being constructed. This map was generated prior to the acquisition of the Hardekraaltjie cemetery (which is indicated on the eastern border of this map). Also identifiable on this map is the two sites purchased by Stellenbosch University for the development of their medical campus. ‘Portion 27, a portion of portion 19 of the farm Belhar’ (Erf 15348) is located in the top right corner of the map (previously part of the Forest Reserve and under the governance of the Cape Divisional Council), and ‘Lot med’ (Erf 14299) is located to the left and was under the governance of the local Parow Municipality. Both these sites were purchased by the university for the development of their medical campus.

At some point in time the two erven acquired by Stellenbosch University in 1967 (Erven 15348 and 14299) were amalgamated to form the single Erf 24602. See **image 3** below. Note that a portion of ‘Lot Med’ (Erf 14299) was returned to the government upon request for the development of Francie van Zijl Drive in the 1970s. It was this request from the government that led to the university’s decision to acquire additional land – of which Hardekraaltjie Cemetery was identified as a suitable solution (due to it bordering existing land owned by the university). This led to negotiations between Parow Municipality and the Cape Divisional Council to transfer the Hardekraaltjie cemetery site to Parow Municipality,² after which it would be sold to Stellenbosch University for the amount of 10 cents. The selling cost

² PAA(AA). *Parow Municipality: Complaints and Enquiries*. Reference AA140/55, vol. E/813, part 1. 1943–1955. Western Cape Archives and Records Service, Cape Town.

noted in the deed of title most likely reflected a symbolic number since the university had already given the local government part of Erf 14299 ('Lot Med') for the development of a road network. This act might have been factored as a form of compensation for the acquisition of the cemetery - although this is not specified in the documents consulted.



Image 3: A Google Earth image from 2017 as extracted from a heritage application (Perception Planning 2017 – Appendix D p.5). This image illustrates the most recent expression of university land ownership in relation to the campus. In this iteration the acquisitions of 'Portion 27' and 'Lot Med' in the 1960s have been amalgamated to form Erven 24602.

The Hardekraaltjie cemetery was officially sold to Stellenbosch University in October 1972, although Erf 15349 was only legally transferred to the university in 1974 (as indicated by the deed of transfer). The site was initially designated for the development of a rugby field (as indicated by a campus plan in 1979). It would appear that this site once was used as a rugby field, although this needs to be confirmed, but aerial imagery of the campus taken in 2002 revealed that “the entire portion of Erf 15349 [Hardekraaltjie Cemetery site] was grassed and mowed” (van der Westhuizen 2011). By 2012 imagery revealed that the site had reverted to natural veld. After the dean of the Faculty of Medicine and Health Sciences, Professor Jimmy Volmink, was alerted to the existence of a cemetery site on campus in 2014, resources were allocated to determine the location of the Hardekraaltjie cemetery site and its status as a burial ground (this occurred through Ground Penetrating Radar scans in 2014 and 2015 respectively).³ As a result of these initiatives, it was confirmed that “sub-surface anomalies consistent with the possible presence of graves” was found on Erf 15349 – referring to the historic Hardekraaltjie cemetery site (Perception Planning 2019:12). In August 2017 Heritage Western Cape instructed that a 50m buffer zone should be imposed around the historic cemetery site as pertaining to future developments on campus grounds (Perception Planning 2019:13). This decision implied that part of Erf 15348 (hosting the sports fields bordering to the north of the Hardekraaltjie cemetery) was designated as a buffer zone.

³ More such scans have been done since (2020, 2024).



Image 4: This image was presented in Perception Planning’s Heritage Impact Assessment of 2019. Erf 15349 (Hardekraaltjie cemetery) is indicated by the red border, and the white dotted line indicates the imposed buffer zone on Stellenbosch University’s campus on Erf 24602 (previously Erf 15348).

As illustrated by the **image 4**, this 50 meter buffer zone is located outside of the historical boundaries of Erf 15349 (Hardekraaltjie cemetery). More recently, as part of the latest endeavour to memorialise the cemetery site, and upon request from representatives of one of the affected communities (Ravensmead), the designated buffer zone was subjected to Ground Penetrating Radar (GPR) scans which identified a number of underground anomalies located in the buffer zone (thus on Erf 15349 acquired in 1967, currently Erf 24602). Upon further investigation, which consisted of ‘test excavation’ performed by an appointed archaeologist in January 2026, it was determined that these anomalies did not constitute burial sites (Orton 2026).

In summation, the 50m buffer zone is located beyond the boundaries of the historically surveyed Hardekraaltjie cemetery site (identified as Erf 15349) and on Erf 15348 (presently part of amalgamated Erf 24602), the buffer zone has been subjected to GPR scans and has further been subjected to test excavation and it has been concluded by the archaeologist that the anomalies found did not constitute burial sites.

REFERENCES

Perception Planning. 2017. Proposed redevelopment of the Tygerberg Hospital Estate on Erf 15350 and Re Erf 14298 (Parow), City of Cape Town. Unpublished report for Department of Transport and Public Works (Western Cape).

Perception Planning. 2019. Annexure C: Tygerberg Medical Campus – Master Site Development Plan | Erven 24602, 18228 & 15349 Parow | July 2019. On behalf of the Department of Transport and Public Works (Provincial Government: Western Cape).

Van der Westhuizen, N. 2011. iKapa Enviroplan: Haardekraaltjie Cemetery, 6 September 2011.

PRIMARY SOURCES

3/BELL. *Bellville Municipality: Hardekraaltjie Cemetery. Pauper Burial.* Reference 296/12, vol. N5. 1943–1955. Western Cape Archives and Records Service, Cape Town.

ACLT. *Bellville Forest Reserve. Hardekraaltjie. Native Location Site. Belhar Farm.* Vol. 356, ref. 16067, part 1. 1929–1963. Western Cape Archives and Records Service, Cape Town.

PAA(AA). *Parow Municipality: Complaints and Enquiries.* Reference AA140/55, vol. E/813, part 1. 1943–1955. Western Cape Archives and Records Service, Cape Town.

PAR. Cape Division: Hardekraaltjie Outspan, 1928-1939. Vol. D19, ref. 19/A114a. Western Cape Archives and Records Service, Cape Town.

Stellenbosch University Archive. Fakulteit van geneeskunde geboue. Reference U/9b. Parow: Tiervlei-Hospitaal: Oordrag van gedeeltes grond aan Universiteit van Stellenbosch. Correspondence Provincial Administration of the Cape of Good Hope and Professor H.B. Thom, 23 June 1967.