



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Thingahangwi Tshivhase

Tel: 012 941 4964

Email: ttshivhase@sahra.org.za

CaseID: 19802

Date: Tuesday March 14, 2023

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Final Decision

In terms of Section 36(3) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mr Anton Pelser

A Pelser Archaeological Consulting

P.O. Box 73703

Lynwood Ridge

0040

Exhumation and relocation of around 378 graves from Ptn 198 & Remainder of Ptn 335 of Doornkloof 391JR (Irene Extension 70) to be impacted by proposed township development

APAC has been appointed to conduct Exhumation and relocation of around 378 graves located at Ptn 198 & Remainder of Ptn 335 of Doornkloof 391JR (Irene Extension 70) to be impacted by proposed township development. An application was lodged to SAHRA in terms of section 36 of the National Heritage Resources Act 25 of 1999.

Final Comment

Due to the magnitude of the proposed exhumation and the indicated challenge of identifying families of the deceased during public consultation, SAHRA BGG conducted a site inspection at the site in November 2022. It was then established that the site in question is a Black Concentration Camp that SAHRA, through the Burial Grounds and Graves Unit has been monitoring for about 2 years if not more. It is within the said context that SAHRA BGG objects to the proposed development project. The following recommendations are proposed:

1. Extensive independent research must be conducted to confirm or exclude the site from being a concentration Camp.
2. The site must be retained in-situ to preserve the history associated with it. A buffer-zone of at-least 50m must be established and maintained around the site.

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3. A HMP must be developed for the maintenance of the site. If the site is to be incorporated into the development, recommended buffer must be honored and the developer is welcomed to do a memorial site provided that necessary permits are obtained.
4. In the event that it is irrefutably proven that the site is not associated with a significant South African History, consented effort must be made to identify families of the deceased. Where necessary, addresses inscribed on some of the tombstones can be visited to trace next-of-kin(s) families. A detailed report of the required public consultation and family consent can then be submitted for consideration.

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

Yours faithfully

Thingahangwi Tshivhase
Heritage Officer: Permitting
South African Heritage Resources Agency

Ngqabutho Madida
Acting Manager: Burial Grounds & Graves Unit

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South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/606648>

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.