

Public Participation Plan for Four Proposed Solar Energy Facilities, Free State: Scaffell Cluster

Prepared for: South Africa Mainstream Renewable
Power Developments (Pty) Ltd

DEFF Pre Application Meeting Reference: 2020-12-0008

SLR Project No.: 720.13101.00003

Report No.: 1

Revision No.: 0

January 2021



DOCUMENT INFORMATION

Title	Public Participation Plan for Four Proposed Solar Energy Facilities, Free State: Scafell Cluster
Project Manager	Nicholas Arnott
Project Manager Email	nicholas@slrconsulting.com
Author	Reuben Maroga
Reviewers	Nicholas Arnott and Stuart Heather-Clark
Keywords	Renewable Energy, Photovoltaic, Grid Connection, Free State
Status	Issued for DEFF consideration
DEFF Pre Application Reference	2020-12-0008
DMRE Reference	-
DHWS Reference	-
Report No.	1
SLR Company	SLR Consulting (South Africa) (Pty) Ltd

DOCUMENT REVISION RECORD

Rev No.	Issue Date	Description	Issued By
0	January 2021	Issued for DEFF consideration	RM

BASIS OF REPORT

This document has been prepared by an SLR Group company with reasonable skill, care and diligence, and taking account of the manpower, timescales and resources devoted to it by agreement with **South Africa Mainstream Renewable Power Developments (Pty) Ltd** (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.

CONTENTS

1.	INTRODUCTION	1
2.	PURPOSE OF THE REPORT	1
3.	PUBLIC PARTICIPATION METHODOLOGY	4
3.1	Public Participation Process	4
3.1.1	Database	4
3.1.2	Site Notices	5
3.1.3	Newspaper Advertisements.....	5
3.1.4	General I&AP notifications and comment periods	5
3.1.5	Authority Notifications	6
4.	CONCLUSION.....	6

LIST OF FIGURES

Figure 2-1:	Locality Map showing the location of the Scaffell Cluster project sites and the grid connection corridor	2
-------------	--	---

LIST OF TABLES

Table 1:	List of Authorities to be included on the Project Database.	6
----------	--	---

ACRONYMS AND ABBREVIATIONS

Acronym / Abbreviation	Definition
BA	Basic Assessment
BAR	Basic Assessment Report
BESS	Battery Energy Storage
DEFF	Department of Environment, Forestry and Fisheries
DESTEA	Free State Department of Economic, Small Business Development, Tourism and Environmental Affairs
DHSWS	Department of Human Settlements, Water and Sanitation
DMRE	Department of Mineral Resources and Energy
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
GN	Government Notice
I&APs	Interested and Affected Parties
MFT	Managed File Transfer
NEMA	National Environmental Management Act, 1998 (No. 107 of 1998)
PP Plan	Public Participation Plan
PV	Photovoltaic
SAHRA	South African Heritage Resources Agency
SLR	SLR Consulting (South Africa) (Pty) Ltd

1. INTRODUCTION

Mainstream Renewable Power Developments (Pty) Ltd (Mainstream) is proposing the development of four (4) solar photovoltaic (PV) facilities, including the required grid connection infrastructure, located within the Ngwathe Local Municipality of the Free State Province. The proposed solar PV projects (collectively referred to as the ‘Scafell Cluster’) consist of the following:

Project Name	Capacity	Affected Property
Damlaagte Solar PV Facility	150MW	R/E of the Farm Damlaagte 249
Damlaagte Grid Line	132kV	R/E of the Farm Damlaagte 249, Portion 3 of Willow Grange 246 and R/E of the Farm Scafell 448
Scafell Solar PV Facility	100MW	Portion 3 of the Farm Willow Grange 246
Scafell Grid Line	132kV	Portion 3 of the Farm Willow Grange 246 and R/E of the Farm Scafell 448
Vlakfontein Solar PV Facility	150MW	Portion 6 of the Farm Vlakfontein 161
Vlakfontein Grid Line	132kV	Portion 6 of the Farm Vlakfontein 161, Portion 3 of the Farm Willow Grange 246 and R/E of the Farm Scafell 448
Ilikwa Solar PV Facility	75MW	Portion 5 of the Farm Proceederfontein 100
Ilikwa Grid Line (including Collector Substation)	132kV	Portion 5 of the Farm Proceederfontein 100 and R/E of the Farm Scafell 448

Each of the project sites are located adjacent to one another (refer to Figure 2-1) and are situated approximately 19 km west of Sasolburg and 22 km north-east of Parys. The Scafell Cluster will have a combined generating capacity of up to 475 MW. Each project will require a Battery Energy Storage (BESS) and grid connection infrastructure (i.e. power line and collector substation, etc) in order to facilitate the grid connection between each solar PV facility and the Scafell Substation.

SLR Consulting (South Africa) (Pty) Ltd (SLR) has been appointed by Mainstream to undertake the required Environmental Authorisation (EA) process in terms of the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) promulgated under the National Environmental Management Act, 1998 (No. 107 of 1998) (NEMA). Based on a review of the Listing Notices (GNR 983, 984 and 985 of 2014) activities applicable to the project, the construction and operation of the solar PV facilities triggers Listed Activity 1 of GN R984, and the grid connection infrastructure triggers Listed Activity 11(i) of GN R983. As a result, a Scoping and EIA (SEIR) process is required in support of the application for Environmental Authorisation (EA) for the solar PV facilities and a Basic Assessment (BA) process for the grid connection infrastructure. This will result in four separate solar PV facility EIAs and four separate grid connection BA Reports.

2. PURPOSE OF THE REPORT

On 5 June 2020, the Minister of the Department of Environment, Forestry and Fisheries (DEFF) gazetted and released a notice (Government Notice (GN) R439) providing input on the directions regarding measures to address, prevent and combat the spread of COVID-19 relating to National Environment Management Permit and Licenses.

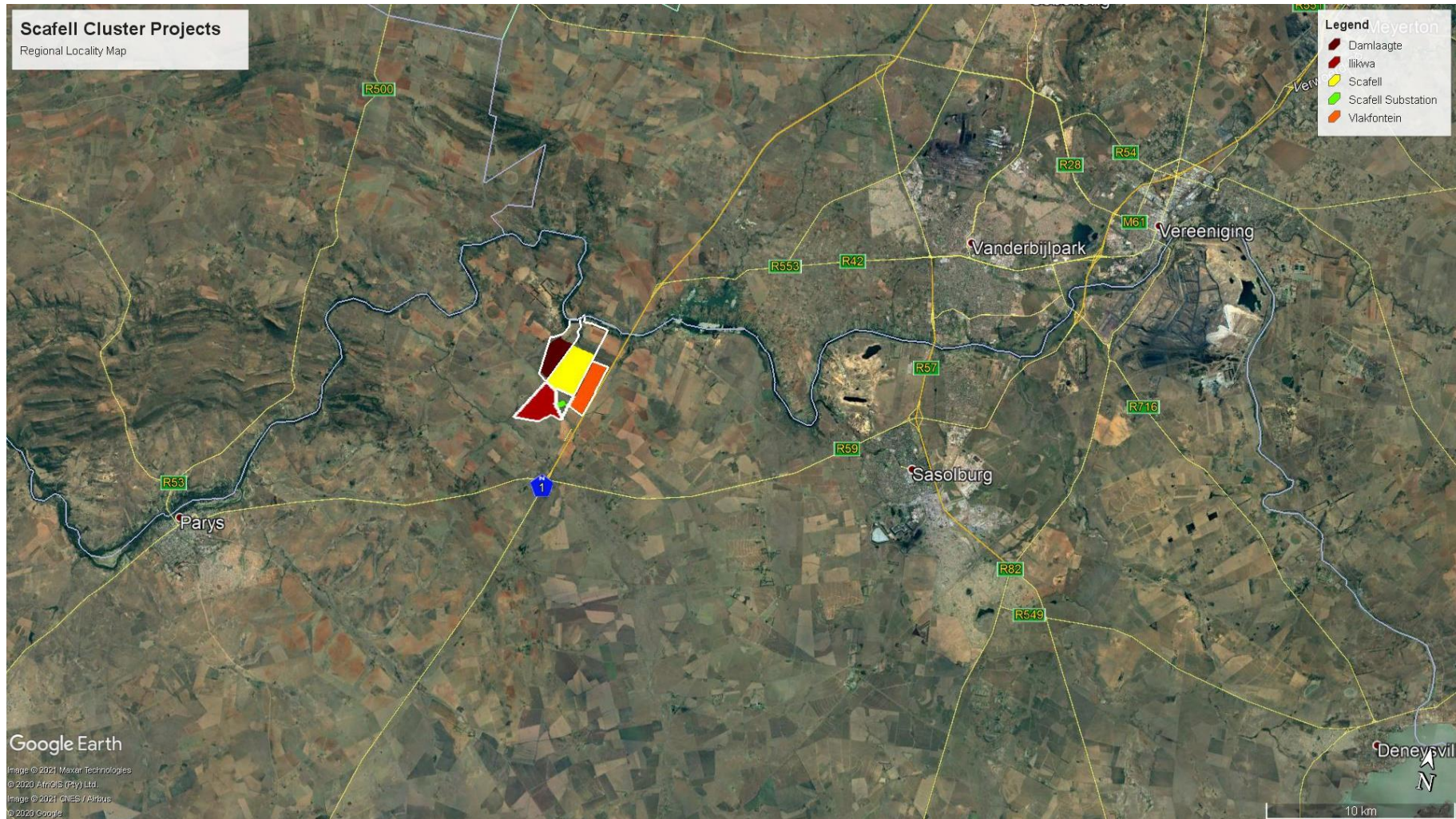


Figure 2-1: Regional setting of the Scafell Cluster project sites and associated grid connection corridor.



Figure 2-2: Local setting of the Scaffell Cluster projects in relation to the existing Scaffell Substation.

Particular reference is made to Annexure 2: Permitting services to be provided by issuing authorities in terms of the NEMA and the EIA Regulations, which states the following:

'3. At all times it must be ensured that reasonable opportunity is provided for public participation and that all administrative actions are reasonable. While the COVID-19 pandemic is a unique circumstance, the specific circumstance in each case must be considered in order to determine what will be reasonable. If in the circumstances of a particular case reasonable alternative methods to give notice to potential interested and affected parties are available, then the relevant competent authority can be approached for agreement in this regard as provided for in regulation 41(2)(e) of the Environmental Impact Assessment Regulations.'

As per the requirements of GN R650 of 5 June 2020, a pre-application meeting request was submitted to the DEFF on Tuesday, 8 December 2020. On 19 January 2021 a pre-application meeting for the proposed projects was held with DEFF. In the meeting, the proposed public participation process was discussed, and it was confirmed that a Public Participation (PP) Plan was required to be submitted to the Department for approval prior to the commencement of the environmental impact assessment and public participation processes. Thus, this PP Plan has been compiled, with due consideration of the recommendations made in the above-mentioned pre-application meeting, for consideration by the DEFF as part of the environmental authorisation process for the proposed projects. This PP Plan summarises the proposed methods that SLR will use to ensure that:

- Information containing all relevant facts in respect of the applications are made available to potential I&APs; and
- All registered I&APs are provided with a reasonable opportunity to comment on the Scoping, EIA and BA Reports.

Furthermore, the PP Plan considers the effectiveness of the regulatory requirements to bring the proposed projects and application to the attention of I&APs under the current Level 3 COVID-19-related restrictions and identifies additional measures which will be undertaken in this regard. Once approval of the PP Plan has been received from the DEFF, SLR will commence the envisaged public participation process for the above-mentioned projects.

3. PUBLIC PARTICIPATION METHODOLOGY

3.1 PUBLIC PARTICIPATION PROCESS

It is proposed that a single and consolidated public participation process will be undertaken for the proposed developments in accordance with the EIA Regulations, 2014 (as amended) and DEFF's Public Participation Guideline in terms of NEMA EIA Regulations (2017). The tasks that will be undertaken as part of the public participation process are set out below.

3.1.1 Database

A preliminary I&AP database will be compiled consisting of landowners, adjacent landowners, ward councillors, authorities (local, regional and national, as applicable), Organs of State, Non-Government Organisations, Community-Based Organisations and other key stakeholders. The database will also be informed by any available databases from the previous projects undertaken in the broader study area and will be updated should additional

requests be made to register after the placement of the site notices (Section 3.1.2) and the newspaper adverts (Section 3.1.3).

3.1.2 Site Notices

Site notices (written in English) will be placed at the affected properties of the proposed projects at conspicuous locations. The site notices will provide an opportunity for I&APs to register on the project database prior to the distribution of the reports for the 30-day review and comment periods.

3.1.3 Newspaper Advertisements

A single newspaper advert advertising the projects will be placed in the Sasolburg Ster prior to submitting the application forms, notifying the public of the planned EIA and Basic Assessment processes for the proposed projects. A second advert will be placed to notify stakeholders of the availability of the Scoping Reports for the 30-day review and comment period.

3.1.4 General I&AP notifications and comment periods

A notification letter and Executive Summary would be sent to all registered I&APs on the project database to inform them of the availability of the draft reports for the 30-day public review and comment periods. The notification letter would be sent via e-mail and post (where e-mail addresses are not available). The notification letter would also contain a link to the SLR website (www.slrconsulting.com), and corresponding zero-rated website (which is accessible from an internet-capable mobile phone without data charges), that I&APs can use to access and download the draft reports and the associated appendices.

Should COVID-19 restrictions permit, hard copies of the reports (Scoping, EIA and BA Reports, as applicable) will be placed at the Sasolburg Public Library for review during the relevant 30-day public review and comment periods.

If the placement of hard copy reports in a publicly accessible locations is not possible due to COVID-19 restrictions, alternative methods of making the related report information physically accessible will be implemented through either of the following, depending on the COVID-19 risks:

- Placement of posters of the Executive Summary in publicly accessible locations (e.g. shopping centres); or
- Placing hard-copies of the executive summaries available in publicly accessible locations for I&APs to take home.

Furthermore, should any I&AP contact SLR to indicate that they are not able to access any of the online project documentation due to lack of internet connectivity, SLR will implement suitable alternative means of providing the requested project information to the I&AP. Such measures may include (but are not limited to) the following:

- Sending hard copies of the Executive Summaries via Post or Courier Service; and
- Having a telephonic discussion to answer any queries that I&APs may have regarding the proposed projects.

All comments received in response to the draft reports during the 30-day review and comment period would be collated and responded to in the Comments and Response Report to be submitted with the final reports to the DEFF for decision-making. When the DEFF has reached a decision on the applications for EAs, a notification letter

(including copies of the EAs for the projects) will be sent to the registered I&APs to inform them of the Department’s decision.

3.1.5 Authority Notifications

A Notification Letter and Executive Summary would be sent to all commenting authorities on the project database to inform them of the availability of the draft reports for the 30-day review and comment period. The notification letter would be sent via e-mail and courier / hand delivery (where e-mail addresses are not available). The notification letter would also contain a link to the SLR and zero-rated websites (www.slrconsulting.com) that I&APs can use to access and download the draft reports.

Table 1 below lists all authorities on the project database that would be consulted as part of the proposed public participation process.

Table 1: List of Authorities to be included on the Project Database.

Authority	
Department of Environment, Forestry and Fisheries (DEFF)	South African National Roads Agency (SANRAL)
Department of Human Settlements, Water and Sanitation (DHSWS)	Department of Agriculture, Land Reform and Rural Development (DALRRD)
Free State Provincial Department of Economic, Small Business, Tourism and Environmental Affairs (DESTEA)	Department of Mineral Resources and Energy (DMRE)
Free State Department of Public Works and Infrastructure	ESKOM
Department of Police, Roads and Transport	Telkom
Free State Department of Agriculture and Rural Development	SENTECH
South African Heritage Resources Agency (SAHRA)	South African Civil Aviation Authority (SACAA)
Free State Provincial Heritage Resources Authority (FSHRA)	Transnet
Fezile Dabi District Municipality	South African Civil Aviation Authority (SACAA)
Ngwathe Local Municipality	South African Radio Astronomy Observatory (SARAO)
Wildlife and Environment Society of South Africa (WESSA)	BirdLife South Africa
Endangered Wildlife Trust	

4. CONCLUSION

Considering the Level 3 COVID-19-related restrictions, SLR has devised a PP Plan to ensure that the proposed project would sufficiently be brought to the attention of potential I&APs. SLR is of the opinion that the public participation methodology presented in this PP Plan is adequate and would allow for the proposed project to be advertised in a manner that is reasonable, fair, just and acceptable.



Reuben Maroga
(Report Author)



Nicholas Arnott
(Project Manager)



**Nicholas Arnott and Stuart
Heather-Clark**
(Project Director)

AFRICAN OFFICES

South Africa

FOURWAYS

T: +27 11 467 0945
Suite 1- Building D
Monte Circle
178 Montecasino Boulevard
Johannesburg
2191

DURBAN

68 on Main, Old Road
Kloof
Durban
3640

CAPE TOWN

T: +27 21 461 1118
5th Floor
Letterstedt House
Newlands on Main Cnr Main
and Campground Roads
Cape Town
7700

Namibia

WINDHOEK

T: + 264 61 231 287
8 General Murtala
Muhammad Street, Eros
Windhoek

Ghana

ACCRA

T: +233 243 9716
9 Watsons Avenue, Mayfair
Gardens, East Airport
Accra