



Planning
Inspectorate

SCOPING OPINION:

Proposed Trelavour Lithium Project

Case Reference: BC0310001

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) to
Regulation 10 of The Infrastructure Planning (Environmental Impact
Assessment) Regulations 2017

31 July 2025

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1. INTRODUCTION

- 1.1.1 On 23 June 2025, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Cornish Lithium G5 Limited (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Trelavour Lithium Project (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.
- 1.1.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:
- <https://nsip-documents.planninginspectorate.gov.uk/published-documents/BC0310001-000004-BC0310001%20-%20Scoping%20Report.pdf>
- 1.1.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.
- 1.1.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.1.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.1.6 The Inspectorate has published a series of advice pages, including '[Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#)'. AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.1.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

['Nationally Significant Infrastructure Projects: Advice pages'](#)

- 1.1.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the proposed development

(Scoping Report Section 2)

ID	Ref	Description	Inspectorate's comments
211	Para 2.1.1.4 and sections 2.6.4, 2.9.1, 2.11 and 2.12	Options	<p>The Scoping Report indicates that options remain under consideration for several components of the proposed development, including the electrical infrastructure, restoration proposals, heavy goods vehicle (HGV) traffic routes, the supply, management and drainage of water, and wastewater management.</p> <p>The ES should include an indication of the main reasons for the final option(s) chosen, including how environmental effects have been considered. If final options have not been selected at the point of application, the ES should assess all remaining options and identify any measures proposed to mitigate significant adverse effects.</p>
212	Paras 2.3.2.3, 2.6.1.1 and 2.6.4.3	Operational life	<p>The predicted operational life of the proposed development is 20 years, following which it would be subject to decommissioning and restoration. The ES should confirm the temporal basis of the assessment of the operational phase. If the operational phase could be longer than 20 years, it should explain the approach to assessment of any likely significant effects arising from continued operation (and identification of mitigation as needed).</p>
213	Table 2.1	Existing mining operations	<p>Table 2.1 of the Scoping Report summarises the planning history of the site, which benefits from extant planning permission for mining operations and associated development. The ES should explain the implications of the proposed development for the existing mining operations (and any restoration works required through planning conditions or obligations). It should include supporting plans showing the proposed development overlaid on existing operations to aid understanding.</p>
214	Para 2.4.2.3	Drill and blast method	<p>The surface mining process is expected to include conventional drill and blast followed by load and haul extraction. Blasting is expected approximately 2 to 3 times per week. The ES should confirm the maximum number of blasting activities per week, and timing of such</p>

ID	Ref	Description	Inspectorate's comments
			activity, used as the basis for assessment. It should set out the worst case parameters for drilling activity. The ES should describe the measures proposed to mitigate impacts from drilling and blasting, including from noise and vibration, and confirm how these would be secured through the development consent order (DCO) or other legal mechanism.
215	Paras 2.4.2.6 and 2.4.3.8	Non-ore development rock and overburden	The Scoping Report states that approximately 0.5 million tonnes of non-ore development rock and overburden would be removed annually, with approximately half processed to produce secondary aggregates for sale or used for restoration activities. If this activity forms part of the proposed development for which the DCO will seek authorisation, the ES should set out the maximum parameters associated with secondary aggregate production, including resources required in production and transport movements, and assess any likely significant effects arising from this component.
216	Section 2.4	Above ground infrastructure	The ES should confirm the location and parameters (minimum and maximum dimensions) of above ground infrastructure, such as the plant buildings, primary crusher, stockpiles, mine fleet, workshops, and any new access and haul roads (if required). The parameters should align with any limits of deviation sought in the draft DCO (dDCO). It should assess any likely significant effects from construction, operation and maintenance, and decommissioning of these components.
217	Paras 2.4.3.4 and 2.4.4.8	Car parking during operation	The ES should confirm the maximum number of car parking spaces and associated vehicle movements that have been used in the assessment.
218	Section 2.4.3	Lithium extraction and crystallisation processes – resources	The Scoping Report describes 2 stages to refine the ore and extract lithium hydroxide: concentrate and hydrometallurgical processing. The ES should confirm what resources (such as water, oxygen and chemicals or reagents) are required in the processes (in addition to the mined material), the volumes needed and expected supply source. Any likely significant effects arising from the use of these resources should be assessed.

ID	Ref	Description	Inspectorate's comments
21.9	Paras 2.4.3.15 to 2.4.3.18	Acid plant stack(s)	An acid plant would be constructed to produce sulfuric acid. The Scoping Report describes the process production and infrastructure required. The ES should confirm the worst case parameters of the stack(s) associated with the acid plant (height and diameter) and describe the methods used for determining these, including any decisions regarding best available techniques (BAT) and any sensitivity testing carried out. The ES should clearly explain the assumptions made in relevant assessments about stack parameters, and these should be secured in the dDCO.
21.10	Paras 2.4.4.8 and 2.6.2.14, and section 2.11	Dewatering and water plant	Dewatering facilities would be required at the mining waste facilities, and a water treatment plant may be required. The ES should confirm the volume of dewatering and surplus water upon which the assessment of the proposed development is based, and the proposals for management of surplus water including potential for reuse. The Inspectorate advises that a dewatering management plan should be provided as part of the ES to ensure groundwater quality and resources are managed with appropriate mitigation measures adopted. The applicant's attention is drawn to the comments of the Environment Agency (EA) in this regard (appendix 2 of this Opinion).
21.11	Section 2.5.3	Electrical infrastructure	The Scoping Report states that 2 electrical connection options are being considered with National Grid Electricity Transmission (NGET). The ES should confirm the selected option, and associated parameters including the location and dimension of any substation and the length and height or depth of overhead line or underground cable. If optionality remains at the point of DCO submission, the ES should provide this information for all options. The ES should any likely significant effects arising from this component.
21.12	Section 2.5.4	Multi-use trail	The Inspectorate notes that the opportunity to create a permissive community multi-use trail is being investigated. If a multi-use trail forms part of the proposed development, the ES should include an assessment of effects across all phases, or explain with supporting justification why likely significant effects would not occur.
21.13	Section 2.5.5	Rail upgrades	An existing rail line could be upgraded to enable transportation of reagents to the proposed development and discussions are ongoing with Network Rail. The ES should confirm if this

ID	Ref	Description	Inspectorate's comments
			approach has been secured. If not, it should set out alternative transportation mode(s) and assess any likely significant effects associated with use of the different mode(s) proposed.
21.14	Sections 2.6.2 and 2.9.1	Existing access points, haul routes and explosives store	The Scoping Report states that existing infrastructure such as access points and haul routes, and potentially the Belowda secure explosives storage site, would be used where possible. The ES should clearly set out which components are existing or proposed or existing requiring modification, and assess any likely significant effects arising from proposed works. It should include supporting plans to illustrate this information.
21.15	Section 2.6.2	Demolition	The ES should confirm the type(s) and volume of material(s) arising from demolition of existing structures, and the number of vehicle movements to transport material(s) offsite (if needed), which have been used as the basis for assessment.
21.16	Section 2.6.2	Temporary construction facilities	The ES should describe what parameters have been used in the assessment for temporary construction compounds and worker accommodation, including the total number, locations, dimensions of any buildings, capacity and parking numbers.
21.17	Section 2.6.2	Foundations	The Scoping Report states that foundations are required for some components of the proposed development. The Inspectorate advises that a foundation works' risk assessment or piling risk assessment should be prepared to inform the assessment of any likely significant effects arising from use of foundation options proposed, where these could lead to creation of contamination pathways into controlled waters.
21.18	Section 2.6.4 and para 4.4.4.3	Decommissioning and restoration	The Scoping Report states that the decommissioning and restoration plan will evolve through the lifetime of the proposed development. The assessment of this phase is not proposed to be to the same level of detail. Notwithstanding this, the Inspectorate advises that the ES should include information about the options being considered, the potential impact pathways and an assessment of any likely significant effects based on the worst case. This comment applies to all aspects scoped into the assessment.
21.19	Para 2.7.1.1	Construction days and hours	The ES should include itemised hours in respect of any activity proposed outside of the standard construction hours. Effort should be made to agree the proposed construction

ID	Ref	Description	Inspectorate's comments
			hours with the host local authority; if these are not agreed, the ES should explain the implications for the assessment conclusions should the hours need to be amended.
2120	Section 2.9	Traffic routes and movements	The ES should confirm the proposed traffic routes and predicted vehicle movements associated with each phase of the proposed development. This should include a breakdown by vehicle type, for example cars and HGVs. It should confirm if movements are additional to, or replacement of, existing vehicle movements associated with the existing mining operations. The applicant's attention is drawn to the comments of National Highways in this regard (appendix 2 of this Opinion).
2121	Section 2.11.1	Water supply and demand	The ES should include a description of the water demands associated with the different components of the proposed development for each phase and outline the strategy for supply, including any abstraction proposed. Consideration should be given to climate change effects, such as drought, to water supply over the operational life of the proposed development. Any likely significant effects arising from water supply and abstraction (if required) should be assessed in the relevant aspect chapters, including water resources and flood risk. The applicant's attention is drawn to the comments of the EA in this regard (appendix 2 of this Opinion).
2122	Section 2.12	Foul water	The ES should confirm how foul water would be managed. If flexibility is sought, for example discharge to existing sewer or offsite treatment, the ES should assess available options, including any consequential effects for example increased nutrients or traffic movements. The applicant's attention is drawn to the comments of the EA in this regard (appendix 2 of this Opinion).
2123	Section 8.5	Mitigation	The ES should consider the potential for mitigation to impact on other environmental aspects. Consideration should be given to when in the assessment period the mitigation measure will be in place. For example, it is noted that section 8.5 of the Scoping Report states that screening or barriers or bunding might be used as mitigation for noise disturbance. Any likely significant effects arising from the presence of screening should also be assessed as relevant, for example landscape and visual receptors.

ID	Ref	Description	Inspectorate's comments
2124	Various	Permits and licences	The Scoping Report states that relevant permits would be obtained in respect of various matters such as management of water and waste. The ES should describe the progress made towards securing permits and where this may impact on the effectiveness or delivery of avoidance or mitigation measures. It should describe any existing permits or licences in place for existing mining operations, such as for abstraction of water, and the implications of the proposed development for these.
2125	Appendix A, Figures 3, 4, 5 and 6	Water storage area	The figures show zones described as water storage areas, but this component is not described in the Scoping Report. The ES must describe all components of the proposed development, and confirm the parameters used in the assessment of any likely significant effects arising from them.
2126	N/A	Existing utilities infrastructure	The applicant's attention is drawn to comments from NGET (appendix 2 of this Opinion) regarding diversions or modifications of existing NGET infrastructure because of the proposed development. The ES should describe any diversions or modifications, and assess any likely significant effects arising, or explain with supporting justification why likely significant effects would not occur.
2127	N/A	Closed circuit television (CCTV) and security fencing	The ES should confirm if any CCTV or security fencing is required as part of the proposed development and, if so, indicate the likely locations and design. Any likely significant effects arising from these components (if required) should be assessed in the ES.
2128	N/A	Connection corridor installation methods and watercourse crossings	The ES should confirm the number and location of watercourse crossings required for installation of underground and overground connections and the method(s) proposed for installation. If flexibility is sought, for example use of open cut or trenchless techniques, the ES should assess available options. The ES should define the applicable parameters for the construction working width and trenches for each installation method proposed or apply a worse case. It should be clear how these parameters are secured through the dDCO or other legal mechanism. The applicant's attention is drawn to the comments of the EA in this regard (appendix 2 of this Opinion).

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 4)

ID	Ref	Description	Inspectorate's comments
221	Paragraph 4.3.1.14	Transboundary	<p>The Inspectorate on behalf of the SoS has considered the proposed development and concludes that the proposed development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the proposed development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts.</p> <p>The Inspectorate considers that the likelihood of transboundary effects resulting from the proposed development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision.</p> <p>Note: The SoS' duty under regulation 32 of the 2017 EIA Regulations continues throughout the application process.</p> <p>The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the annex to its Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process', links for which can be found in paragraph 1.1.7 above.</p>
222	Section 4.5	Flexibility	<p>The Inspectorate notes the applicant's desire to incorporate flexibility into its dDCO and its intention to apply a 'Rochdale Envelope' approach for this purpose. The applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the proposed development have yet to be finalised and provide reasons. At the time of application, any proposed development parameters should not be so wide-ranging as to represent effectively different developments.</p>

ID	Ref	Description	Inspectorate's comments
			<p>The development parameters, and any limits of deviation, defined in the dDCO should be consistent with those assessed in the ES. The Inspectorate notes that the Scoping Report commits to assessment of a reasonable worst-case approach. The ES must identify and assess the worst case for each option remaining in the dDCO.</p> <p>It is a matter for the applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from many undecided parameters. The description of the proposed development must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.</p>
223	Section 4.6	Mitigation and management plans	<p>The Scoping Report states that management and mitigation measures would be implemented in respect of various matters. The ES should describe the measures relied upon to avoid significant adverse effects and confirm how these would be secured in the DCO. It should be clear how any monitoring (including water quality monitoring) and remedial action would be secured. The applicant is encouraged to submit outline versions of management plans.</p> <p>The applicant's attention is drawn to the comments of Cornwall Council and the EA (appendix 2 of this Opinion) regarding additional management plans that may be required to manage adverse effects, such as a construction phase surface water management plan, landscape and ecological management plan, drilling fluid breakout plan and decommissioning environmental management plan.</p>
224	N/A	Professional judgement	<p>Where the ES utilises professional judgement to either assign significance or in the absence of a recognised methodology, the ES should provide a justification for this. Where judgement is used to assess that a significance of 'moderate effect' is not considered a significant effect, this should clearly be stated in the ES.</p>
225	N/A	Trees and hedges	<p>The Scoping Report does not specifically address arboriculture. The Inspectorate notes the advice of Cornwall Council and NE, that there is extensive tree resource within the proposed development site including trees subject to protection at Trerice Bridge, as well as Cornish hedges within the proposed utilities' infrastructure corridors. The ES should include an assessment of any likely significant effects to trees and hedges from the</p>

ID	Ref	Description	Inspectorate's comments
			<p>construction, operation and decommissioning of the proposed development in the relevant aspects, for example ecology and landscape. The assessment should be undertaken from a robust baseline, supported by survey data. Effort should be made to agree the location and method of survey effort with relevant consultation bodies. The ES should clearly describe the number and/ or length of hedge that would be temporarily or permanently impacted. Consideration should also be given to hydrological impacts for example waterlogging where relevant. The ES should describe any mitigation required to avoid or reduce significant adverse effects to trees and hedges, and it should be demonstrably secured in the DCO. Applicant of the mitigation hierarchy should be evidenced in the ES. The applicant's attention is drawn to Cornwall Council's comment (appendix 2 of this Opinion) in this regard.</p>

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Land quality and ground conditions

(Scoping Report Section 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
31.1	Para 6.3.2.15	Mineral resource or designation outside of the study area	The Scoping Report proposes that any mineral resource or designation outside of the study area would be scoped out of the assessment, including Wheal Remfry County Geology Site. The Inspectorate agrees that this matter can be scoped out of further assessment on the basis that significant effects are not likely to occur to receptors outside of the final study area, in the absence of an impact pathway for effects.
312	Table 6.1	Mineral safeguarding areas (MSA) / sterilisation of mineral resources during all phases	<p>The Scoping Report proposes to scope out this matter on the basis that the proposed development is in line with the Council's MSA designation and that the layout is designed to minimise sterilisation. It seeks to scope out operational phase effects on the basis that this matter would be mitigated during construction. Whilst this impact pathway is not listed in the table under decommissioning, the Scoping Report does not elsewhere propose to scope it in for decommissioning and the Inspectorate has assumed that this phase is also proposed to be scoped out.</p> <p>The Inspectorate does not have sufficient information to agree to scope this matter out at this stage. It notes the advice of Cornwall Council that the Goonvean and Treviscoe pits may have china clay and allied materials, which could be sterilised by the proposed development (including through disposal of mining waste). In addition, it is unclear how the proposed development is compatible with the MSA for china clay or how construction phase effects would be mitigated to avoid operational phase effects, if this matter is not assessed in the ES. No mitigation to avoid sterilisation of the MSA is identified for the decommissioning phase. Accordingly, the ES should include an assessment of this matter, including provision of a mineral resource assessment. The ES should describe</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>any measures relied upon to avoid or reduce likely significant adverse effects and confirm how these would be secured through the DCO or other legal mechanism.</p> <p>The applicant's attention is drawn to Cornwall Council's comments (appendix 2 of this Opinion) in this regard.</p>
31.3	Table 6.1	Contaminated soil and unstable ground conditions during construction	<p>The Scoping Report states that contaminated land risk assessments would ensure no significant effects are likely, and measures detailed in a construction environmental management plan (CEMP) and excavated materials management plan (EMMP) would mitigate accidental and residual effects.</p> <p>The Inspectorate notes that the Scoping Report states that contamination associated with historic mining and processing, and other industrial activities may be present and further desk study and investigations have yet to be undertaken to inform the baseline. In the absence of this baseline information, and a full preliminary risk assessment (PRA), together with detail of the mitigation measures to address the identified risks, the Inspectorate does not have sufficient information to agree that this matter can be scoped out of further assessment. The ES should provide an assessment, or otherwise demonstrate the absence of likely significant effects, with evidence of agreement from relevant consultation bodies.</p>
31.4	Table 6.1	Damage to soil structure during all phases	<p>The Scoping Report proposes to scope out an assessment of damage to soil structure during all project phases on the basis that mitigation measures would be detailed in a CEMP, EMMP and mine closure plan.</p> <p>The Inspectorate notes that there is some agricultural land within the site, and that some of this (near St Dennis), has been regionally mapped as Grade 3 Best and Most Versatile (BMV). Agricultural land classification (ALC) surveys have not yet been undertaken. It is unclear as to the extent of agricultural land that may be affected by the proposed development and mitigation measures have not yet been detailed. As such, the Inspectorate does not have sufficient information to agree to scope this matter out of further assessment. The ES should include an assessment of this matter for relevant</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			parts of the site, or demonstrate an absence of likely significant effects, with evidence of agreement from relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
31.5	Paras 6.3.1.2 and 6.3.1.3, and section 6.8.1	Baseline ground conditions and survey	There is some discrepancy across sections of the Scoping Report about the proposed approach to establishing baseline conditions for ground contamination, and proposals for targeted site walkover and phase 2 intrusive investigation. For the avoidance of doubt, the Inspectorate agrees with the applicant's approach to establishing the baseline as described in paragraphs 6.8.1.2 to 6.8.1.4 of the Scoping Report. The ES assessment should be undertaken based on a robust understanding of the baseline. The Inspectorate advises that effort should be made to agree the need for and scope of phase 2 intrusive investigation across different parts of the proposed development site with relevant consultation bodies. If it is determined that phase 2 intrusive investigation is not required for parts of the study area, a justification for this approach must be provided in the ES together with evidence of agreement from relevant consultation bodies. The ES should clearly explain which parts of the study area have been subject to phase 1 desk-based assessment and phase 2 intrusive investigation, and survey results should be provided.
31.6	Para 6.3.2.2	Study area	The Scoping Report states that the study area for the land quality and ground conditions assessment will be the site boundary. The ES should provide a clear justification for the extent of the study area chosen and how this relates to the extent of the likely impacts, informed by the baseline data collection. The ES should also confirm the guidance that has been used to support the choice of study area and should be clearly depicted on figures to aid understanding.
31.7	Section 6.5	Mitigation	The Scoping Report states that mitigation measures related to land quality and ground conditions will be developed as the design of the proposed development progresses and identifies potential mitigation measures. The ES should include a description of all

ID	Ref	Description	Inspectorate's comments
			<p>proposed mitigation measures relied upon to avoid or reduce significant adverse effects and state how these measures are proposed to be secured.</p> <p>The applicant's attention is drawn to the comments of the EA (appendix 2 of this Opinion) regarding commitments to management of unexpected contamination within the CEMP and following the EA's approach to groundwater protection.</p>
31.8	Section 6.5	Mitigation – BMV agricultural land and soil	<p>The ES should set out details of how it is proposed to avoid or reduce significant effects from soil handling on BMV agricultural land and soil quality, including through site design and soil management measures (informed by survey effort). This may be in the form of an outline soil management plan. The applicant's attention is drawn to Natural England's (NE) comments in this regard (appendix 2 of this Opinion).</p>
31.9	Sections 6.6 and 6.8.1	ALC surveys and BMV land	<p>The ALC survey should have sufficient coverage across relevant areas of the proposed development site to accurately inform assessment in line with relevant guidance and standards (for example NE's Guide to assessing development proposals on agricultural land), or justify why an alternative surveying approach is sufficient. Effort should be made to agree the extent and method of ALC surveys with relevant consultation bodies.</p> <p>The ES should quantify the ALC grade and BMV classification of each surveyed area (in a table) that would be temporarily or permanently impacted because of the proposed development, with reference to accompanying map(s) depicting the grades.</p> <p>The ES should demonstrate that the mitigation hierarchy has been applied, to show that options have been considered to avoid or minimise loss of BMV land and maximise use of poorer quality agricultural land and, where BMV land is required, to provide a clear justification for why this has been necessary.</p>
31.10	Section 6.6	Effects to Trelavour Downs Site of Special Scientific Interest (SSSI)	<p>The Inspectorate notes that it is proposed to assess effects to Trelavour Downs SSSI as part of the land quality and ground conditions assessment. The Inspectorate advises that effects to this receptor, which is nationally designated for its mineralogy, should also be assessed as part of the ecology and biodiversity assessment. Please refer to the Inspectorate's comments at ID 3.6.24 of this Opinion.</p>

3.2 Water resources and flood risk

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Table 7.1	Contamination of surface water and groundwater from plant/ equipment and handling/ storage of pollutants during all phases	The Scoping Report seeks to scope this matter out based on measures detailed in a CEMP and EMMP being implemented to mitigate any impacts. The Inspectorate agrees that this matter can be scoped out on that basis provided that the ES includes a description of the measures proposed (which may be in outline versions of the CEMP and EMMP) and these are demonstrably secured in the dDCO.

ID	Ref	Description	Inspectorate's comments
322	Section 7.2	Guidance	In addition to the documents referenced, the Inspectorate advises that the Sustainable Urban Drainage Systems (SuDS) Manual (C753) and Guidance on the Construction of SuDS (C768) (Construction Industry Research and Information Association (CIRIA)) should be used to inform the design of SuDS.
323	Paras 7.3.2.2 and 7.3.2.6	Study area	<p>The Scoping Report states that a study area of the site plus 500m buffer would be used but does not present a justification for this. It also states that the hydrological and hydrogeological environment is relatively complex given the historic and current land use.</p> <p>The Inspectorate advises that the final study area should be based on the zone of influence of the proposed development, including potential for hydrological connectivity. The extent of and rationale for the selected study area should be explained in the ES. Effort should be made to agree it with relevant consultation bodies.</p>

ID	Ref	Description	Inspectorate's comments
324	Para 7.3.2.8	Flood zones	<p>The Scoping Report states that the site is in Flood Zone 1, at low risk of flooding from rivers or the sea; however, Figure 9 (Appendix A) suggests that parts of the site (primarily within areas defined for utilities' infrastructure as shown on Figure 3 (Appendix A)) are in Flood Zones 2 or 3. The Inspectorate advises that the ES baseline description should identify locations where development is proposed in Flood Zones 2 or 3, and distinguish between Flood Zones 3a (high probability) and 3b (functional floodplain). The ES should assess any likely significant effects arising from siting of the proposed development within flood zones, and identify mitigation as required.</p> <p>The applicant's attention is drawn to the comments of the EA (appendix 2 of this Opinion) regarding the potential need for hydraulic modelling to address data gaps in locations where flood zone mapping is not available, for example smaller watercourses with smaller catchments. Effort should be made to agree the approach to addressing data gaps with relevant consultation bodies, and this should be explained and evidenced in the ES.</p>
325	Sections 7.4 and 7.6	Effects from trenching	<p>The Inspectorate advises that the ES should assess and describe any likely significant effects arising from trenching activity, where this could result in contamination of water resources (see the Inspectorate's comments at ID 2.1.28 of this Opinion).</p>
326	Section 7.5	Embedded mitigation	<p>The Scoping Report states that the proposed development would incorporate embedded measures to mitigate impacts on water resources and flood risk but does not provide detail. Any embedded measures to avoid or reduce likely significant effects should be described in the ES; it should be clear how these would be secured. The Inspectorate notes that a surface water management system is proposed to manage potential increased flood risk and contamination. As a minimum, outline information about the proposed system during all development phases should be provided in the ES.</p>
327	Section 7.6	Discharges to water	<p>The ES should describe discharges to water associated with the proposed development and any permits required or implications for existing permits. Effort should be made to agree the scope and methodology of assessment work, including water quality modelling, with relevant consultation bodies. Evidence of discussions and any agreements reached</p>

ID	Ref	Description	Inspectorate's comments
			should be provided within the ES. The assessment should include consideration of foul water discharge; please see the Inspectorate's comments at ID 2.1.22 of this Opinion.
328	Section 7.8.2	Methodologies	The Inspectorate notes that several assessments (environmental risk assessment, flood risk assessment (FRA), water framework directive (WFD) assessment and numerical groundwater modelling) are proposed. These should be used to inform preparation of the ES. Specific cross-references should be made in the ES to the location of information in these assessments that is relevant to the ES. The assessment outcomes should be reported in the ES where there is potential for likely significant effects.
329	Para 7.8.2.3	FRA	The ES should include an assessment of all sources of flood risk where significant effects are likely, informed by the FRA. The FRA should follow the EA's guidance on carrying out flood risk assessment, available on Gov.uk. It should include an assessment of all sources of flood risk and apply relevant EA climate change allowances for the proposed development location. The applicant's attention is drawn to the EA's comments regarding use of the 2050s epoch and a credible maximum climate change scenario (appendix 2 of this Opinion) in this regard. The FRA should include information to demonstrate how the sequential and exception tests would be passed, as required.
3210	N/A	Water abstraction	The ES baseline description should explain the existing abstraction activity and model the abstraction activity required for the proposed development. It should assess any likely significant effects arising from proposed abstraction (including change to the existing regime) to local watercourses and groundwater. The applicant's attention is drawn to the EA's comments in this regard (appendix 2 of this Opinion).
3211	N/A	EA data	The EA has published new flood and coastal erosion risk data in 2025 following the release of its "National assessment of flood and coastal erosion risk in England 2024". Further updates are also expected to follow. The applicant should ensure that assessments (including flood risk and climate change) take account of updated data sets as these become available through Defra's Data Services Platform. Where relevant, the

ID	Ref	Description	Inspectorate's comments
			applicant is encouraged to liaise with the EA to determine the implications for project design and the scope of assessments.
3212	N/A	Figures	The Inspectorate advises that the ES should include figures to clearly illustrate the location of receptors scoped into the assessment, including WFD bodies and private water supply, and the extent of flood zones. Figures should include labelling of features for clarity.

3.3 Noise and vibration

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
331	Para 8.7.1.1	Vibration from fixed plant, on-site vehicle movements and road traffic during operation	<p>The Scoping Report seeks to scope this matter out based on distance between receptors and on-site plant, and that on-site road surfaces would be maintained to avoid irregularities. Paragraph 8.3.2.2 states that a 100m study area is normally sufficient for construction vibration but an area for operational effects is not provided.</p> <p>On the basis that the location of these components is not yet confirmed and the spatial scope of effects is not clear, the Inspectorate does not agree to scope this matter out at this stage. Accordingly, the ES should include an assessment, or demonstrate absence of a likely significant effect together with evidence of agreement with relevant consultation bodies. The ES should confirm the measures in place to ensure road surfaces are maintained, and how these would be secured.</p>

ID	Ref	Description	Inspectorate's comments
332	Section 8.2	Guidance on noise from mineral extraction	The Inspectorate advises that the ES should refer to guidance on noise from mineral working as set out in Guidance on the planning for mineral extraction in plan making and the application process (available on Gov.uk).
333	Section 8.3.1	Data sources	In addition to the data sources listed, the ES should refer to any relevant baseline information gathered from monitoring of the site as part of conditions attached to extant planning permissions (as described in section 8.2.2 of the Scoping Report).
334	Para 8.3.2.2	Study area for operational noise	The Scoping Report states that a 2km study area would be sufficient to capture impacts at noise sensitive receptors but does not explain the basis for this. The final study area used in the ES should be selected based on the potential for likely significant effects from

ID	Ref	Description	Inspectorate's comments
			operation of the proposed development, including additional traffic and rail movements. Effort should be made to agree the study area with relevant consultation bodies.
335	Sections 8.3.2 and 8.8.1	Vibration baseline	The Scoping Report does not state how it is proposed to establish the vibration baseline. The ES should describe the vibration baseline and confirm how it has been established by reference to any relevant guidance. Effort should be made to agree the approach with relevant consultation bodies.
336	Section 8.4.3	Decommissioning effects	The Scoping Report states that effects during decommissioning, closure and restoration are expected to be similar to or less than construction and these are not discussed further. The Inspectorate's comments on decommissioning at ID 2.1.18 of this Opinion apply to this matter.
337	Para 8.5.2.1	Operational mitigation for blasting	The ES should describe the standards for receptors in respect of air overpressure and the basis from which these are derived. It should describe the mitigation proposed to manage the proposed development within these standards, and how it would be secured.
338	Section 8.8.3	Assessment criteria	Effort should be made to agree the significance criteria for assessment of operational noise, including the approach to thresholds for the lowest observed adverse effect level (LOAEL) and significant observed adverse effect level (SOAEL), with relevant consultation bodies. The applicant's attention is drawn to the EA's comments in this regard (appendix 2 of this Opinion).
339	Table 8.8	Significance criteria for mineral extraction noise	The ES should define the threshold for marginal and larger exceedance of LOAEL so it is clear how the effect level of minor or moderate has been determined. It should confirm at what level effects are determined to be significant.
3310	Paras 8.8.3.23 to 8.8.3.26	Significance criteria for vibration during operation	The ES should set out the criteria used to determine the effect significance from vibration during operation, including vibration associated with blasting. It should state the level at which effects are determined to be significant.

ID	Ref	Description	Inspectorate's comments
33.11	N/A	Rail use	The ES should include an assessment of effects from noise and vibration associated with increased use of the existing rail line during operation, or otherwise explain with supporting justification why likely significant effects would not occur.
33.12	N/A	Low frequency noise	The ES should assess low frequency noise from operation of mechanical equipment in mineral processing, or provide a justification, with evidence of agreement from relevant consultation bodies, as to why significant effects are not likely to occur. The ES should describe any mitigation required to avoid or reduce effects arising from low frequency noise, which should be demonstrably secured in the DCO.
33.13	N/A	Figures	The ES should include figure(s) showing the location relative to the proposed development of noise sensitive receptors scoped into the assessment, noise important areas (NIA) within the study area, and any proposed monitoring locations.

3.4 Air quality

(Scoping Report Section 9)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
34.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
342	Para 9.2.1.1	Guidance	The Inspectorate notes that the Institute of Air Quality Management (IAQM) published version 2.2 of Guidance on the assessment of dust from demolition and construction in January 2024. The ES should refer to the latest iteration of the guidance.
343	Para 9.2.2.4	Nitrogen and acid deposition	For habitats and plant species scoped into the assessment, the ES should explain how sensitivity to deposition has been established if information is not available from the Air Pollution Information System (APIS).
344	Para 9.4.1.3	Decommissioning effects	The Scoping Report states that effects during decommissioning, closure and restoration are expected to be largely similar to construction. It is not proposed to assess these separately. The Inspectorate's comments on decommissioning at ID 2.1.18 of this Opinion apply to this matter.
345	Paras 9.4.2.2 and 9.6.1.1	Effects from ammonia (NH ₃) – emissions from vehicles and acid plant stack	The Inspectorate agrees with the statement at paragraph 9.4.2.2 that NH ₃ should be scoped into the assessment, but notes that it is not in the list of likely significant effects to be scoped in at paragraph 9.6.1.1 of the Scoping Report (other than in terms of contribution to acid deposition). This pollutant should be scoped in for further assessment, unless it can be demonstrated in the ES that effects would not be significant, supported by evidence of agreement to the approach with relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
34.6	Para 9.4.2.3	Pollutants during operation	The Scoping Report states that volatile organic compounds (VOC), polycyclic aromatic hydrocarbon (PAH) and fluorine are not expected to be of such relevance that they would be considered key emissions of interest. The ES should assess these pollutants or explain, with supporting information, why likely significant effects would not occur.
34.7	Section 9.5.2	Mitigation during operation	The Scoping Report states that there are range of options for mitigation during operation but does not present any detailed examples. The ES should clearly describe all mitigation measures proposed to reduce and control emissions during operation. It should be clear how these would be secured through the DCO or other consenting process.
34.8	Para 9.8.1.1	Air quality management plan	The Scoping Report refers to an air quality management plan (AQMP), which could set out possible action levels for pollutants scoped into the assessment. The Inspectorate advises that the AQMP should be submitted as part of the ES and it should confirm action levels and the remedial action that could be undertaken to address exceedances.
34.9	Para 9.8.1.2	Baseline air quality monitoring	The Inspectorate advises that effort should be made to agree the location of baseline air quality monitoring with relevant consultation bodies, including Cornwall Council.
34.10	Para 9.8.2.2	Screening of air quality effects from traffic	In applying the IAQM screening thresholds to determine the need for detailed assessment of traffic emissions, cumulative vehicle movements from other committed developments should also be considered.
34.11	Para 9.8.3.8	Effects to ecological receptors	The ES should include a description of likely significant effects from emissions to air to all ecological receptors scoped into the assessment. Cross-reference can be made to any habitats regulation assessment (HRA) required for European sites to avoid duplication.
34.12	N/A	Guidance	The applicant's attention is drawn to the Defra advice 'PM _{2.5} Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the proposed development have been identified and how action has been taken to minimise emissions of PM _{2.5} or its precursors.

3.5 Traffic and transport

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
35.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
352	Paras 10.3.2.4 and 10.4.1.1	Highways' upgrade works	The Scoping Report states that no upgrades to existing site accesses and junctions are expected but also refers to the potential for transportation of abnormal loads during the construction phase of the proposed development. For the avoidance of doubt, the Inspectorate advises that the ES should include an assessment of any likely significant effects arising from site access and junction works required to accommodate abnormal load transport movements.
353	Para 10.3.2.5	Public rights of way (PRoW)	The Scoping Report identifies that there are PRoW in and surrounding the proposed development site, including the Cornish Way and Goss Moor Multi-use Trail and National Cycle Network (NCN). The applicant's attention is drawn to Cornwall Council's comments (appendix 2 of this Opinion), which provide further information and maps of potentially affected PRoW. For the avoidance of doubt, the Inspectorate advises that the ES should assess impacts to users of PRoW or other recreational routes (including severance, delay, amenity and fear/ intimidation) during all phases of the proposed development where impacts are likely to result in significant effects.
354	Para 10.3.3.1	Rail receptors	The Scoping Report states that an existing rail line could be upgraded for use in transportation. The ES should confirm if any works associated with this component could give rise to likely significant effects to rail users and, if so, include an assessment. The ES should also confirm if there would be any impacts to existing level crossings from increased vehicle movements, and any increase in use of existing rail stations, and provide

ID	Ref	Description	Inspectorate's comments
			an assessment of significant effects where these are likely. Mitigation should be identified for any likely significant effects concluded.
355	Para 10.4.1.2	Decommissioning	The Inspectorate's comments at ID 2.1.18 of this Opinion apply to this matter. The ES should provide a prediction of traffic flows (including the anticipated duration) which are likely to be required during decommissioning which could impact upon the transport network and highlight any differences between the construction and decommissioning phases. Whilst it may not be possible to fully forecast the baseline traffic flow environment 20 years into the future, the Inspectorate considers that information would be available for example from the Council's local plan to enable a high level assessment.
356	Para 10.8.1.2	Non-motorised user (NMU) counts	The Scoping Report states that additional surveys including NMU counts would be undertaken if required but does not set out how this would be determined. Noting that the proposed development site hosts several PRow the Inspectorate advises that NMU surveys to understand baseline usage of PRow that could be significantly affected should be undertaken. Effort should be made to agree the location and method of survey work with relevant consultation bodies.
357	Para 10.8.2.7	Travel Plan	The Scoping Report states that a travel plan will be prepared to encourage use of sustainable transport modes. The Inspectorate advises that if the ES is reliant upon measures in a travel plan in terms of how traffic flows used in the assessment are predicted, then measures required should be clearly set out in the travel plan, an outline of which should be submitted with the DCO application and demonstrably secured. The ES should set out what assumptions have been made about operational travel modes.

3.6 Ecology and nature conservation

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
361	Para 11.3.2.5	Statutory sites designated for marine biological features	<p>The Scoping Report states that there are 3 marine biological sites in the study area, which are scoped out of the assessment. It does not name the sites or set out why they are proposed for scoping out.</p> <p>Noting the inland location of the proposed development and absence of impact pathways to marine areas, the Inspectorate agrees that these receptors can be scoped out of the assessment but advises that the 3 sites within the study area should be named in the ES together with confirmation that there no impact pathways.</p>
362	Table 11.2	Reptiles and spread of invasive non-native species (INNS) during operation	<p>The Scoping Report states that effects to reptiles and INNS would be assessed for construction and decommissioning but not operation. It does not present a justification for this. In the absence of this information and noting that there is suitable habitat for reptiles across the site and INNS have been identified, the Inspectorate does not agree to scope these matters out. Operational effects to reptiles and from spread of INNS should be assessed or the ES should demonstrate the absence of likely significant effects for this phase, with evidence of agreement from relevant consultation bodies.</p>
363	Table 11.3	Ancient woodland during all phases	<p>The Scoping Report seeks to scope this receptor out based on there being no ancient woodland in the site or area of influence. Figure 13 shows the location of ancient woodland identified in the ancient woodland inventory relative to site, with the nearest record being approximately 2km distant. Given this distance, which is beyond the 15m buffer in Natural England's standing advice, the Inspectorate agrees that this matter can be scoped out of the assessment.</p>
364	Table 11.3	Otter during all phases	<p>The Scoping Report states that waterbodies on site are unsuitable for otter and onsite habitat provides limited potential for otter. However, the Inspectorate notes that the Scoping Report also states that the Mining Waste Facilities development area has habitat</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>that is suitable for commuting and Goonvean does have suitable waterbodies, and that these locations are proposed to be checked for signs of otter as part of badger surveys.</p> <p>Noting that there is suitable habitat for otter at the Mining Waste Facilities development area, in the absence of otter surveys the Inspectorate does not have sufficient information to agree that this matter can be scoped out. The ES should include an assessment of effects to otter in this location or explain, with evidence of agreement from relevant consultation bodies, why significant effects are not likely to occur.</p> <p>The Inspectorate agrees that effects to otter at Trelavour Pit and Trelavour Processing Plant development areas can be scoped out based on there being no suitable habitat.</p>
365	Para 11.3.2.46 and Table 11.3	Great crested newt (GCN) during all phases	The Scoping Report states that GCN are absent from Cornwall and are not considered further. The Inspectorate agrees that GCN can be scoped out of the ES.
366	Table 11.3	White claw crayfish during all phases	The Scoping Report states that the site is outside of the geographical range for white claw crayfish. The Inspectorate agrees that this receptor can be scoped out of the ES.
367	Table 11.3	Water vole during all phases	The Scoping Report states that the site is outside of the geographical range for water vole. The Inspectorate agrees that this receptor can be scoped out of the ES.
368	Para 11.8.2.4	Features of less than local importance	The Scoping Report states that features of less than local importance, as defined in Chartered Institute of Ecology and Environmental Management (CIEEM) guidance, are proposed to be scoped out of the ES but safeguards would be implemented to ensure legal compliance, for example protection of common nesting bird species. The Inspectorate agrees that these features can be scoped out of the assessment but for the avoidance of doubt considers that nesting birds are scoped in as per Table 11.2 of the Scoping Report.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Any measures relied upon to ensure legal compliance should be described and demonstrably secured in the DCO.

ID	Ref	Description	Inspectorate's comments
36.9	Section 11.2	Legislation	The Inspectorate advises that the Salmon and Freshwater Fisheries Act 1975 and The Eels (England and Wales) Regulations 2009 are relevant to the proposed development and must be considered in defining the assessment scope.
36.10	Para 11.3.1.5	Baseline data sources	The Scoping Report states that areas outside of the Trelavour Pit, Trelavour Processing Plant and Mining Waste Facilities development areas are proposed for survey in 2025 and 2026 but does not specify where. The Inspectorate advises that baseline surveys should be undertaken at all development areas in the proposed DCO boundary, including areas for utility infrastructure, water storage and temporary construction facilities, where this is required to inform a robust baseline from which to assess likely significant effects. Effort should be made to agree survey locations and method with relevant consultation bodies.
36.11	Section 11.3.2	Surveys at the Mining Waste Facilities development area	Several species' surveys are proposed for the Treviscoe and Goonvean pits including bat, badger, bird, reptile and invertebrate. The timing, location and method of the surveys is not specified. The Inspectorate understands that the surveys will be undertaken to inform the baseline environment for the ES. Effort should be made to agree these matters with relevant consultation bodies
36.12	Para 11.3.2.38	Dormice surveys	<p>The Scoping Report proposes no dormice surveys at the Trelavour Processing Plant because existing woodland and connected scrub habitat would be retained as the proposed development is being constructed, operated and decommissioned.</p> <p>The Inspectorate does not have sufficient information to agree that dormice surveys in this area are not required. Notwithstanding that suitable habitat is proposed to be retained, it is unclear how this commitment is to be secured and it is also unclear if there could be other</p>

ID	Ref	Description	Inspectorate's comments
			impact pathways for example through disturbance. Surveys should be undertaken in this area unless the ES can demonstrate that dormice are unlikely to be affected regardless of presence. Effort should be made to agree the approach with relevant consultation bodies.
36.13	Paras 11.3.2.40 to 11.3.2.41	Otter survey	<p>The Scoping Report states that it is assumed otter is absent from Trelavour Pit and Trelavour Processing Plant areas based on distance from the nearest watercourses but that evidence of otter in terrestrial habitats would be considered through badger surveys. A similar approach is proposed in the Mining Waste Facilities development area, where there is habitat suitable for commuting otter including waterbodies at Treviscoe and Goonvean.</p> <p>The Inspectorate agrees with the proposed survey approach for Trelavour Pit and Trelavour Processing Plant development areas but advises that otter surveys to inform the ES baseline must be carried out where evidence of otter presence is identified through checks during the badger surveys. These surveys must be carried out by an ecologist that is qualified and experienced in otter survey.</p> <p>Noting that the proposed development would affect the waterbodies at Treviscoe and Goonvean, the Inspectorate considers that otter surveys are required in these areas.</p> <p>Effort should be made to agree the scope and location of surveys with relevant consultation bodies.</p>
36.14	Sections 11.4.1 and 11.4.3	Impact pathways during construction and decommissioning	In addition to the impact pathways listed, the Inspectorate considers that there is potential for likely significant effects from pathways including change to water quality, vibration, change to air quality from vehicle movements, which should be considered in the ES.
36.15	Section 11.4.2	Impact pathways during operation	In addition to the impacts listed, the Inspectorate considers that there is potential for change to air quality from vehicle movements, change to water quality and permanent loss of habitat, which should be considered in the ES.

ID	Ref	Description	Inspectorate's comments
36.16	Para 11.5.1.4	Protected species' licences	The ES should confirm the status of any application(s) for protected species' licences at the point of DCO application. Where application(s) are yet to be submitted, the ES should describe the status of pre-application discussion with NE.
36.17	Section 11.6	Nutrient neutrality	The Inspectorate advises that likely significant effects to water-dependent nature conservation sites scoped into the assessment arising from elevated nutrient levels due to impacts pathways including direct discharge, surface runoff, groundwater interactions should be assessed in the ES. The assessment should take into account any strategic solutions for nutrient neutrality or diffuse water pollution plans in development or already implemented. Mitigation to avoid or reduced significant adverse effects from elevated nutrients should be identified and demonstrably secured in the DCO, including monitoring of water quality where required.
36.18	Table 11.2	Effects scoped into the assessment	Table 11.2 does not specify which international, national and locally designated sites are proposed to be scoped into the assessment. For the avoidance of doubt, the Inspectorate advises that all sites in Table 11.1 and on Figure 13 should be scoped in or the absence of a likely significant effect should be demonstrated in the ES, with evidence of agreement from relevant consultation bodies. Effects from scrub encroachment to internationally and nationally designated sites should be considered and the applicant's attention is drawn to NE's comment in this regard (appendix 2 of this Opinion).
36.19	Table 11.2	Effects scoped into the assessment	Table 11.2 presents the receptors proposed to be scoped into the assessment but does not specify which impact pathways would be considered for each receptor. For the avoidance of doubt, the Inspectorate advises that the ES should consider all identified impact pathways for effect as set out in Section 11.4 for each receptor or demonstrate the absence of a likely significant effect for a particular pathway and receptor, with evidence of agreement from relevant consultation bodies.
36.20	Table 11.2	Effects from INNS	Effects from INNS are scoped in but paragraph 11.3.2.30 only identifies terrestrial INNS. The Inspectorate advises that the ES should confirm if there are aquatic INNS present. Where relevant, the ES should assess any likely significant effects arising from risk of

ID	Ref	Description	Inspectorate's comments
			transfer of aquatic INNS for example through dewatering of the pits, and identify any mitigation required to avoid or reduce adverse effects.
3621	Para 11.8.1.3	Survey methods	The Inspectorate advises that consideration should be given to undertaking plant surveys within the special areas of conservation (SACs) and SSSIs to higher standard using National Vegetation Classification (NVC). The proposed development site should be surveyed for western rustwort in all areas suitable for colonisation of the species.
3622	Para 11.8.1.8	Biodiversity net gain (BNG)	The ES should clearly distinguish mitigation required for significant adverse effects on biodiversity from wider enhancement measures, including BNG.
3623	Para 11.8.1.14	Survey access and assumptions	The ES should explain any assumptions made, and the basis for this approach with reference to relevant guidance, where it is not possible to access locations for survey due to site safety concerns. Effort should be made to agree the approach with relevant consultation bodies.
3624	N/A	Trelavour Downs SSSI	The Inspectorate advises that Trelavour Downs SSSI should be scoped into the assessment for all phases of the proposed development, including effects from loss of designated geological feature(s). The ES should identify mitigation for any permanent loss in the SSSI and confirm how this would be secured in the DCO. The applicant's attention is drawn to NE's comments in this regard (appendix 2 of this Opinion).
3625	N/A	Fish	The Scoping Report does not refer to fish receptors. The Inspectorate notes the EA's advice that there are notable fish present in the River Fal, which could be affected by the proposed development during all phases. The ES must include an assessment of impacts to fish, based on a robust baseline evidenced by data and surveys, and describe any likely significant effects and mitigation required to avoid or reduce such effects. Impact pathways considered should include noise, change in water quality and habitat from contaminated runoff, and water quantity and velocity change. Effort should be made to agree the scope and method of the assessment with relevant consultation bodies. The applicant's attention is drawn to the EA's comments (appendix 2 of this Opinion).

ID	Ref	Description	Inspectorate's comments
3626	N/A	Hedgehog	The Scoping Report states that hedgehog is likely to be present in some parts of the site but it is not listed in matters to be scoped in or out of the assessment (Tables 11.2 and 11.3). The Inspectorate advises that effects to hedgehog should be assessed or the ES should demonstrate the absence of likely significant effects, with evidence of agreement from relevant consultation bodies.
3627	N/A	Confidential Annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

3.7 Landscape and visual impact

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
37.1	Para 12.7.1.1	Effects on landscape designations outside the study area during all phases	<p>The Scoping Report proposes to scope out assessment of landscape and visual effects on landscape designations outside of the study area, as there are no landscape designations within 5km of the site. It states that the designation is the Cornwall National Landscape, which is approximately 9km southeast of the proposed development. Dartmoor National Park is approximately 50km east of the proposed development.</p> <p>The Inspectorate agrees that, in the absence of any nationally designated landscapes within the 5km study area of the proposed development, this matter can be scoped out.</p>

ID	Ref	Description	Inspectorate's comments
372	Para 12.3.3.1	Study area	<p>The Scoping Report states that the assessment will use a study area of 5km around the proposed development but this may be adjusted depending on the zone of theoretical visibility (ZTV), which it proposes to generate to show maximum visibility based on upper height limits of proposed infrastructure (currently 35m). The Inspectorate considers this approach to be acceptable but advises that the ZTV should also be used to identify any potentially affected dispersed receptors beyond the study area including from elevated viewpoints. Effort should be made to agree the study area with relevant consultation bodies, including Cornwall Council once the ZTV is produced. The ES should include a figure overlaying the ZTV with the landscape and visual receptors to aid understanding.</p>
373	Section 12.3.4.3 and	Representative viewpoints	<p>The Scoping Report provides an initial list of representative viewpoints and states that final positioning will be informed by design development, consultation feedback and agreed with Cornwall Council's Landscape Officer. The ES should confirm if any</p>

ID	Ref	Description	Inspectorate's comments
	Table 12.1		<p>disagreement remains on the final viewpoints in the ES, and provide an explanation if requested viewpoints were discounted.</p> <p>The applicant's attention is drawn to the comments of Cornwall Council (appendix 2 of this Opinion) regarding the proposed viewpoints.</p>
374	Section 12.5	Mitigation	<p>Where the avoidance of a likely significant effect is reliant on mitigation measures, including embedded measures such as landscape retention, these should be described in the ES along with the proposed methods by which they will be secured in the DCO, assisted by a plan or figures where appropriate.</p> <p>The ES should confirm the establishment period of any landscaping scheme and long-term management needs. Any assumptions made with regards to the height that proposed mitigation planting would have reached by the assessment years should be clearly presented and justified for the purposes of generating photomontages and reaching the assessment conclusions.</p>
375	Section 12.6	Likely significant effects to landscape receptors	<p>For the avoidance of doubt, as this section of the Scoping Report does not specify which landscape receptors are proposed to be scoped into the assessment, the Inspectorate advises that effects to the National Character Area (NCA) 154 Hensbarrow, Cornwall Character Area (CCA) 27: St Austell or Hensbarrow China Clay Area and Landscape Character Type (LCT) A China Clay Workings should be assessed. In addition, the ES should assess effects to the Areas of Great Landscape Value (AGLV) listed in 12.3.2.12 or demonstrate the absence of significant effects to these receptors, with evidence of agreement from relevant consultation bodies.</p>
376	Section 12.6	Likely significant effects	<p>The Inspectorate advises that the contribution of the existing conical sky tips to landscape character should be considered and any likely significant effects to landscape character arising from their proposed removal should be assessed (in addition to visual impacts). The effects of water vapour plumes from the proposed plant during the winter should also be assessed where significant effects to landscape or visual receptors are likely.</p>

ID	Ref	Description	Inspectorate's comments
37.7	Section 12.8.3	Visualisations	Effort should be made to agree the number, location and type of visualisations (including photomontages) produced to support the assessment with relevant consultation bodies, including Cornwall Council.
37.8	N/A	Dark skies	The Inspectorate notes the advice of Cornwall Council that the proposed development would not be in a designated dark skies area but is in a generally dark area. The ES should include a description of the night-time baseline by reference to relevant guidance and data sources, and provide an assessment of any likely significant effects arising from the introduction of new external lighting during all phases of the proposed development. Consideration should be given to production of a selection of night-time baseline photography and visualisations to support the assessment of effects from proposed external lighting.

3.8 Historic environment

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
38.1	Section 13.8	Buried archaeology in the Trelavour, Hallow and Hendra, Treviscoe and Goonvean Pits during all phases	<p>The Scoping Report proposes to scope out an assessment of effects to buried archaeology in the Trelavour, Hallow and Hendra Treviscoe and Goonvean Pits, on the basis that there is no potential for the survival of buried and built archaeology due to comprehensive removal of original and historically created ground surfaces.</p> <p>Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate is content with this approach.</p>

ID	Ref	Description	Inspectorate's comments
382	Section 13.7	Likely significant effects to designated heritage assets	<p>The Scoping Report sets out a generic description of likely significant effects that would be considered in the EIA but does not specify which receptors would be scoped in. For the avoidance of doubt, the Inspectorate advises that setting effects to the listed buildings and scheduled monuments identified in paragraphs 13.3.3.7, 13.3.3.10 and 13.3.3.11 of the Scoping Report should be assessed, or absence of a likely significant effect, with evidence of agreement from relevant consultation bodies, should be demonstrated. The Inspectorate advises that as a minimum, effects to the Grade II* Parkandillick Engine House and Grade II Trellice Bridge must be assessed. Consideration should be given in the setting assessment to effects from dust, noise and vibration during all phases of the proposed development, including from transport movements.</p>
383	Section 13.7	Likely significant effects to buried archaeology	<p>The Scoping Report identifies that effects to buried archaeology would be considered in the EIA for parts of the proposed development site that have not witnessed prior industrial development but also states that it is unlikely that groundworks would result in significant effects due to design avoidance. For the avoidance of doubt, and in the absence of detailed baseline information and mitigation proposals, the Inspectorate advises that all</p>

ID	Ref	Description	Inspectorate's comments
			areas of the proposed development aside from those discussed in ID 3.8.1 of this Opinion should remain scoped in to the assessment of buried archaeology at this stage.
384	Section 13.7	Likely significant effects – conical sky tips	The Inspectorate advises that the visual relationship between the existing conical sky tips and the Scheduled Monument Castle-an-Dinas should be considered in the assessment of setting effects from the proposed development. The applicant's attention is drawn to Historic England's comment (appendix 2 of this Opinion) in this regard.
385	Paras 13.9.1.11 and 13.9.1.12	Intrusive surveys	Effort should be made to agree the need for, scope and timing of, intrusive surveys including targeted trial trenching with relevant consultation bodies, including Cornwall Council. The ES baseline description must be sufficiently developed to enable a robust assessment of likely significant effects of the proposed development arising from impacts to buried archaeology.
386	Sections 13.9.3 and 13.9.4	Determining significance	The Scoping Report proposes a descriptive, qualitative presentation of impact magnitude, and use of professional judgment in the determination of effect significance. The Inspectorate's comments regarding use of professional judgment at ID 2.2.4 of this Opinion apply to this matter. Whilst the Inspectorate is content for the approach described to be used as a basis for assessment, it advises that the ES must clearly explain how impact magnitude and effect significance have been determined for each receptor assessed.
387	N/A	Monuments protection programme (MPP) for clay industry	The Inspectorate notes the advice of Historic England that the proposed development has potential to impact historic sites and assets of potential national importance that are currently undesignated, as identified in Historic England's MPP Clay Industry Report. The ES should include an assessment of effects to these assets where likely significant effects could occur. Consideration should be given to the value or sensitivity assigned to the asset(s) based on their significance. The applicant's attention is drawn to Historic England's comments in this regard (appendix 2 of this Opinion), which includes maps of the sites and assets.

3.9 Socio-economics and land use

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
39.1	Section 14.7 and para 14.8.1.1	Land use effects during operation	<p>The Scoping Report proposes to scope out an assessment of land use effects during the operational phase on the basis that any changes in land use within the site would occur during construction and decommissioning.</p> <p>The Inspectorate is content with this approach provided that the construction phase assessment reflects the duration of change in land use, where this would last throughout operation.</p>
39.2	Section 14.7	Indirect effects on tourism and recreation receptors during decommissioning	<p>The Scoping Report proposes to scope in indirect effects on tourism and recreation receptors during construction and operation but does not state if the decommissioning phase would be assessed or provide a justification for scoping it out. Noting that decommissioning could require similar activities to the construction phase, the Inspectorate does not have sufficient evidence to scope this matter out. The ES should assess this matter, or otherwise explain, with evidence of agreement from relevant consultation bodies, why significant effects are not likely to occur.</p>
39.3	Section 14.7	Effects on tourism accommodation during decommissioning	<p>The Scoping Report proposes to scope in effects on tourism accommodation during construction and operation but does not state if the decommissioning phase would be assessed or provide a justification for scoping it out. It is unclear what the workforce requirements would be during decommissioning and therefore potential for demand on accommodation. The Inspectorate does not have sufficient evidence to scope this matter out. The ES should assess this matter, or otherwise explain, with evidence of agreement from relevant consultation bodies, why significant effects are not likely to occur.</p>

ID	Ref	Description	Inspectorate's comments
394	N/A	Employment generation	The ES should confirm the predicted number of jobs created during all phases of the proposed development, which has been used as the basis for assessment.
395	N/A	Effects to agricultural businesses	The Inspectorate advises that the assessment of wider socio-economic effects should include consideration of effects to existing agricultural business, where these could be affected by land use change and there is potential for likely significant effects to occur.

3.10 Human health and wellbeing

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Table 15.6	Health related behaviours - physical activity during operation	<p>The Scoping Report proposes to scope out an assessment of physical activity health effects during operation on the basis that impacts on PRow and open space used for recreation would arise during construction.</p> <p>The Inspectorate is content with this approach provided that the construction phase assessment reflects the duration of impacts to PRow and open space, where these continue throughout operation.</p>
3.10.2	Table 15.6	Health related behaviours - risk taking behaviour during all phases	<p>The Scoping Report proposes to scope out an assessment of health effects related to risk taking behaviour for all project phases, as the proposed development is not expected to impact on risk taking behaviour.</p> <p>Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.</p>
3.10.3	Table 15.6	Health related behaviours – diet and nutrition during all phases	<p>The Scoping Report proposes to scope out an assessment of health effects related to diet and nutrition for all project phases, as the proposed development is not expected to impact on diet and nutrition.</p> <p>Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.</p>
3.10.4	Table 15.6	Social environment – housing during operation, decommissioning and closure	<p>The Scoping Report proposes to scope out an assessment of health effects related to housing during the operational, decommissioning and closure phases on the basis that the operational phase is not expected to impact on demand for housing and any impacts arising from decommissioning and closure are expected to be less than or equivalent to those arising during construction (scoped in due to existing pressures on housing stock and likely demand from construction workers).</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out for the operational phase. Noting that decommissioning phase effects could be equivalent to construction, which is proposed to be scoped in, the Inspectorate does not agree to scope this matter out for decommissioning. The ES should include an assessment of the decommissioning phase, or demonstrate the absence of likely significant effects.
3.105	Table 15.6	Social environment – open space, leisure and play during operation	<p>The Scoping Report proposes to scope out an assessment of health effects related to open space, leisure and play during the operation phase on the basis that impacts would arise during construction.</p> <p>The Inspectorate agrees that this matter can be scoped out of the ES provided that the construction phase assessment reflects the duration of impacts to PRoW and open space, where these continue throughout operation.</p>
3.106	Table 15.6	Social environment - transport modes, access and connections during operation, decommissioning and closure	<p>The Scoping Report proposes to scope this matter out on the basis that any impact on transport and connectivity arising during operation is not expected to affect health at a population level and any impact arising during decommissioning and closure is expected to be less than or equivalent to those arising during construction (scoped in).</p> <p>Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out for the operational phase. Noting that decommissioning phase effects could be equivalent to construction, which is proposed to be scoped in, the Inspectorate does not agree to scope this matter out for decommissioning. The ES should include an assessment of the decommissioning phase, or demonstrate the absence of likely significant effects.</p>
3.107	Table 15.6	Social environment - community identity, culture, resilience and influence during operation,	The Scoping Report proposes to scope this matter out on the basis that the operational phase is not expected to impact community identity, culture, resilience and influence and any impact arising during decommissioning and closure is expected to be less than or equivalent to those arising during construction (scoped in).

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		decommissioning and closure	Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out for the operational phase. Noting that decommissioning phase effects could be equivalent to construction, which is proposed to be scoped in, the Inspectorate does not agree to scope this matter out for decommissioning. The ES should include an assessment of the decommissioning phase, or demonstrate the absence of likely significant effects.
3.108	Table 15.6	Social environment - social participation, integration and support during operation, decommissioning and closure	<p>The Scoping Report proposes to scope this matter out on the basis that during operation impacts are unlikely and any impacts arising during decommissioning and closure are expected to be less than or equivalent to those arising during construction (scoped in).</p> <p>Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out for the operational phase. Noting that decommissioning phase effects could be equivalent to construction, which is proposed to be scoped in, the Inspectorate does not agree to scope this matter out for decommissioning. The ES should include an assessment of the decommissioning phase, or demonstrate the absence of likely significant effects.</p>
3.109	Table 15.6	Social environment – relocation during all phases	<p>The Scoping Report proposes to scope this matter out on the basis that the proposed development is not expected to require any relocation of residents.</p> <p>Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of further assessment.</p>
3.10.10	Table 15.6	Bio-physical environment – climate change mitigation and adaptation during all phases	<p>The Scoping Report proposes to scope this matter out on the basis that effects on human health and wellbeing are not anticipated at a population level, as set out in Section 18: Climate Change and Greenhouse Gas Emissions of the Scoping Report.</p> <p>Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of further assessment as part of human health and wellbeing.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.11	Table 15.6	Bio-physical environment – water quality or availability during all phases	<p>The Scoping Report proposes to scope this matter out on the basis that effects on human health and wellbeing are not anticipated at a population level and water quality or availability effects are assessed in Section 7: Water Resources and Flood Risk of the Scoping Report.</p> <p>Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of further assessment as part of human health and wellbeing.</p>
3.10.12	Table 15.6	Bio-physical environment - land quality during all phases	<p>The Scoping Report proposes to scope this matter out on the basis that effects on human health and wellbeing are not anticipated at a population level, and that land quality effects are assessed in Section 6: Land Quality and Ground Conditions of the Scoping Report.</p> <p>Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of further assessment as part of human health and wellbeing.</p>
3.10.13	Table 15.6	Bio-physical environment - radiation during all phases	<p>The Scoping Report proposes to scope out an assessment of health effects on radiation for all project phases on the basis that human health and wellbeing effects at a population level are not anticipated.</p> <p>Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.</p>
3.10.14	Table 15.6	Institutional and built environment - health and social care services during operation, decommissioning and closure	<p>The Scoping Report proposes to scope this matter out on the basis that during operation the proposed development is not expected to impact on the demand for health and social care services and any impacts arising during decommissioning and closure are expected to be less than or equivalent to those arising during construction (which is scoped in).</p> <p>Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the operational phase. Noting that decommissioning phase effects could be equivalent to construction, which is proposed to be scoped in, the Inspectorate does not agree to scope</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			this matter out for decommissioning. The ES should include an assessment of the decommissioning phase, or demonstrate the absence of likely significant effects.
3.10.15	Table 15.6	Institutional and built environment - built environment during operation	<p>The Scoping Report proposes to scope this matter out on the basis that any impacts on the built environment are expected to arise during construction.</p> <p>Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.</p>
3.10.16	Table 15.6	Institutional and built environment - wider societal infrastructure and resources during operation, decommissioning and closure	<p>The Scoping Report proposes to scope this matter out on the basis that no impacts are expected during operation and any impacts arising from decommissioning and closure are expected to be less than or equivalent to those arising during construction (scoped in due to the likely scale of the construction workforce, which could increase demand for wider societal infrastructure and resources).</p> <p>Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the operational phase. Noting that decommissioning phase effects could be equivalent to construction, which is proposed to be scoped in, the Inspectorate does not agree to scope this matter out for decommissioning. The ES should include an assessment of the decommissioning phase, or demonstrate the absence of likely significant effects.</p>

ID	Ref	Description	Inspectorate's comments
3.10.17	N/A	Guidance	The applicant's attention is drawn to the comments from the United Kingdom Health Security Agency (UKHSA) (appendix 2 of this Opinion). The applicant should consider the UKHSA's advice document 'Advice on the content of Environmental Statements accompanying an application under the NSIP Regime' when preparing the ES.

3.11 Major accidents and disasters

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Para 16.7.1.1	Geological hazards during all phases	The Scoping Report proposes to scope this matter out on the basis that earthquakes and landslides caused by natural geological conditions are unlikely to occur due to minimal evidence of seismic activity in the region. The Inspectorate agrees that earthquakes can be scoped out from further assessment based on the information presented in the Scoping Report. However, the Inspectorate notes that it is proposed to assess the potential for landslides as a climate hazard in Section 18: Climate Change and Greenhouse Gas Emissions as there are steep slopes that may be susceptible to landslides, particularly with increased precipitation. The Inspectorate advises that risk of major accidents or disasters arising from potential for landslides should be assessed, or the ES should otherwise explain why significant effects are not likely to occur.

ID	Ref	Description	Inspectorate's comments
3.11.2	Para 16.8.1.4	Hazard identification (HAZID) study	The Inspectorate advises that the outcomes of the HAZID study should be reported as part of the ES assessment.
3.11.3	N/A	Control of Major Accidents and Hazards (COMAH) sites	The Inspectorate advises that the ES should include assessment of any risks to or from the proposed development arising from domino effects with COMAH sites, where these could result in likely significant effects. The applicant's attention is drawn to Health and Safety Executive's (HSE) comments (appendix 2 of this Opinion) regarding major hazard sites within HSE public safety consultation zones (Liskeard/ Indian Queens pipeline and Indian Queens Power Ltd).

3.12 Waste

(Scoping Report Section 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.121	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.122	Para 17.3.1.1	Hazardous waste	The Scoping Report states that potential for the proposed development to generate hazardous waste is currently unknown. The ES should confirm if hazardous waste will be generated and, if so, the proposed arrangements for management and disposal of hazardous waste, including the location of disposal facilities. It should assess any likely significant effects on waste arising from this impact pathway.
3.123	Section 17.3.3	Landfill capacity	The ES should present the most current data available about existing landfill capacity and use that as the basis for assessment. The applicant's attention is drawn to the EA's comment (appendix 2 of this Opinion) regarding the data provide in the Scoping Report being incorrect.
3.124	Section 17.5.1	Waste management plan	The Inspectorate advises that an outline version of the proposed waste management plan for the operational phase should be provided with the ES.

3.13 Climate change and greenhouse gas emissions

(Scoping Report Section 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.131	Table 18.2	Water stress and drought during construction and decommissioning	The Scoping Report proposes to assess this matter for the operational phase but is silent regarding the construction and decommissioning phases. In the absence of a justification, the Inspectorate is not able to agree that this matter can be scoped out for construction and decommissioning. The ES should include an assessment, or demonstrate the absence of likely significant effects.
3.132	Section 18.7.1	Coastal flooding during all phases	The Scoping Report proposes to scope out coastal flooding as part of the climate change aspect for all phases of the proposed development on the basis that the site is located 10km to 13km from the coast at an elevation of approximately 150m to 200m. The Inspectorate agrees that significant effects are not likely to occur and further assessment can be scoped out of the climate change assessment.
3.133	Section 18.7.2	Greenhouse gas (GHG) emissions – emissions through a carbon sink during construction	The Scoping Report proposes to scope out release of GHG emissions through a carbon sink as a result of soil disruption during the pre-construction and construction phases on the basis that this matter is not predicted to be material. In the absence of an explanation as to why a carbon sink would be created, the Inspectorate is not able to agree to scope this matter out. The ES should include an assessment of this matter or demonstrate the absence of a likely significant effect.

ID	Ref	Description	Inspectorate's comments
3.134	Paras 18.2.1.1 and 18.2.1.6	Carbon budget	The Inspectorate notes that the climate change and GHG emissions assessment is proposed to be undertaken in line with the Sixth Carbon Budget. The applicant should ensure that assessments take account of the latest carbon budget information. The

			Inspectorate notes that the Seventh Carbon Budget was published by the UK Climate Change Committee in February 2025.
3.135	Section 18.5.2	Mitigation for GHG emissions	The Scoping Report states that if required mitigation to manage GHG emissions would be proposed, for example electrification of equipment. Noting that any GHG emissions would contribute to climate change and, in line with Institute of Environmental Management and Assessment (IEMA) (now Institute of Sustainability and Environmental Professionals (ISEP)) guidance, could be considered significant, the Inspectorate advises that where such measures are available to reduce effects these should be implemented, or the ES should justify why it is not possible.
3.136	N/A	Indirect GHG emissions (Scope 2 and 3)	The ES should assess indirect GHG emissions from the production and import of reagents and other raw materials, and on-site production of sulfuric acid. The applicant's attention is drawn to the EA's comments (appendix 2 of this Opinion) in this regard.
3.137	N/A	Downstream effects	The ES should set out the implications for the assessment of the judgments in R (on the application of Finch on behalf of the Weald Action Group) v Surrey County Council and others, and Friends of the Earth Ltd and South Lakeland Action on Climate Change – Towards Transition v Secretary of State for Levelling Up Housing and Communities, West Cumbria Mining Ltd and Cumbria County Council. It should confirm if the proposed development could result in likely significant effects from downstream GHG emissions arising from combustion or processes (such as from sale of aggregate by-products) and, if so, provide an assessment or otherwise explain why such an assessment is not possible.

3.14 Cumulative and combined effects

(Scoping Report Section 19)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.14.2	Section 19.1.3	Proposed methodology	<p>For the avoidance of doubt, the ES should include a cumulative effects assessment for all individual aspects scoped into the ES in accordance with this Opinion (other than climate change and GHG emissions, which does not require cumulative assessment), unless it can be demonstrated in the ES that cumulative effects would not be significant, supported by evidence of agreement with relevant consultation bodies.</p> <p>The applicant's attention is drawn to the comments of Cornwall Council regarding the approach to cumulative landscape and visual impact assessment. The Inspectorate advises that the landscape and visual cumulative effects assessment should be informed by a ZTV to understand the extent of likely cumulative impact. Effort should be made to agree any additional representative viewpoints and visualisations to support the cumulative assessment with relevant consultation bodies.</p>
3.14.3	Section 19.1.3	Proposed methodology	The ES should present the threshold criteria used in the stage 2 screening exercise to generate the shortlist of other development.
3.14.4	Section 19.1.4 and Table 19.1	Initial list of developments	The Scoping Report identifies an initial list of developments for cumulative assessment within 10km of the proposed development site. The Inspectorate advises that consideration should be given to developments beyond 10km, noting that there may be different zones of influence dependent on the aspect as stated at paragraph 19.1.3.3 of the Scoping Report. Developments for the long list should be identified based on the zone of influence for relevant aspects and potential for likely significant cumulative effects. The Inspectorate

			advises that Parkandillick A2 industrial activity and the SUEZ Cornwall Energy Recovery Centre should be included in the cumulative effects assessment for relevant aspects, including air quality. The applicant's attention is drawn to Cornwall Council's comments in this regard (appendix 2 of this Opinion). The assessment of cumulative effects should also include consideration of interaction between the proposed development and existing mining operations as relevant.
3.145	N/A	Figure(s)	The ES should include a figure(s) depicting the locations and extent of developments long listed and shortlisted for cumulative effects assessment in relation to the proposed development.

3.15 Aspects proposed to be scoped out

(Scoping Report Section 20)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.15.1	Para 20.1.1.7	Aviation during all phases	The Scoping Report proposes to scope out an assessment of aviation on the basis that heights of infrastructure forming part of the proposed development are comparable to that of existing structures in the vicinity. The applicant proposes to consult the Civil Aviation Authority to review any requirements for aviation lighting and would review the need for assessment if taller than currently expected infrastructure or cranes are required. The Inspectorate agrees that aviation can be scoped out of further assessment.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The relevant parish council or, where the application relates to land in Wales or Scotland, the relevant community council	St. Stephen-in-Brannel Parish Council
	St. Dennis Parish Council
	St. Enoder Parish Council
	St. Wenn Parish Council
	Roche Parish Council
	St. Issey Parish Council
	St. Breock Parish Council
	Withiel Parish Council
	Lanivet Parish Council
	Luxulyan Parish Council
	Treverbyn Parish Council
	St. Mewan Parish Council
	Grampound with Creed Parish Council
	Ladock Parish Council
	St. Newlyn East Parish Council
	Colan Parish Council
	St. Columb Major Parish Council
The Environment Agency	The Environment Agency

SCHEDULE 1 DESCRIPTION	ORGANISATION
Natural England	Natural England
The Forestry Commission	Forestry Commission South West
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The relevant Highways Authority	Cornwall Council
	National Highways
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	Police and Crime Commissioner for Devon, Cornwall and the Isles of Scilly
The relevant ambulance service	South Western Ambulance Service NHS Foundation Trust
The relevant fire and rescue authority	Cornwall Fire and Rescue Service

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory undertaker’ is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Cornwall and the Isles of Scilly
The relevant NHS Foundation Trust	South Western Ambulance Service NHS Foundation Trust

STATUTORY UNDERTAKER	ORGANISATION
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	South West Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd

STATUTORY UNDERTAKER	ORGANISATION
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity generator with CPO Powers	Indian Queens Power Limited
The relevant electricity distributor with CPO Powers	National Grid Electricity Distribution (South West) Limited
	Advanced Electricity Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited

STATUTORY UNDERTAKER	ORGANISATION
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
Cornwall Council
Devon County Council
Plymouth City Council
West Devon Borough Council
South Hams District Council
Torridge District Council

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Cornwall Council
Devon County Council
Health and Safety Executive
Historic England
Indigo Pipelines Limited
National Grid Electricity Transmission Plc
National Highways
Natural England
Network Rail
Police and Crime Commissioner for Devon, Cornwall and the Isles of Scilly
South Hams District Council
St Enoder Parish Council
St Newlyn Parish Council
The Environment Agency
Treverbyn Parish Council
United Kingdom Health and Security Agency
West Devon Borough Council



L Feekins-Bate
Environmental Services
Operations Group 3
Temple Quarry House
2 The Square
Bristol
BS1 6PN

Your ref: BC0310001
My ref: PA25/00652/PREAPP
Date: 21 July 2025

By email:
Trelavourlithium@planninginspectorate.gov.uk

Dear Ms Feekins-Bate

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by Cornish Lithium G5 Limited (the applicant) for an Order granting Development Consent for the Trelavour Lithium Project (the proposed development)

Scoping consultation – Cornwall Council Response

Thank you for your consultation with Cornwall Council in relation to the EIA scoping request by Cornish Lithium for their proposal at Trelavour Lithium Project.

Consultation is a key aspect of all Environmental Impact Assessments. This letter sets out the Council's consultation response to the EIA Scoping Request and includes responses from our internal consultees. The Environmental Statement should report on how these consultation responses have been addressed in the EIA including any justification for the omission of any issues.

The Environmental Statement (ES) should include the following information and set out the proposal for development in the context formed by the legal framework, Regulations made under Statute, Statutory Development Plans, Government Circulars and Policy Guidance and where relevant published guidance from Government Departments and other statutory regulators. At the local level, the ES should describe the background of land use planning and environmental policies and their application in relation to the site and the surrounding area. Policies that form the overall context for a decision on the proposal should be described. Where policies set compliance standards or other statutory

or non-statutory criteria, these should be identified. The detailed implications of these policies and others that relate to specific impacts should be considered when each impact is assessed.

It is expected that mitigation requirements would be described within each of the individual topic chapters of the Environmental Statement. This should provide for a schedule of the mitigating measures proposed and a timetable for their implementation

The comments provided in this letter represent the views of Cornwall Council consultees:

Public Rights of Way

Following a detailed review of the site layout plan included within the Environmental Impact Assessment (EIA) Scoping Report, the Council's Public Rights of Way (PRoW) Team has identified thirty (30) PRoW links that may be subject to potential impact as a result of the proposed development.

A summary table is provided below, outlining each affected PRoW, the extent (in length) of the anticipated impact, and the nature of the impact as categorised in the 'Category' field. These categories are explained in the note section of the table. In addition, a series of maps illustrating the affected PRoW network in relation to the Trelavour Project has been prepared and is available in Appendix B.

The EIA Scoping Report acknowledges that certain PRoW may require diversion or extinguishment. However, in the absence of further critical detail, such as proposed alternative routes for diversions, a definitive list of paths that Cornish Lithium considers necessary for extinguishment, or a comprehensive site plan clearly delineating the proposed modifications on the ground, the Council's PRoW Team is presently unable to provide substantive advice regarding these proposed changes.

Accordingly, we respectfully request that Cornish Lithium furnish the Council's PRoW Team with the following:

- Detailed site plans indicating the precise nature and location of proposed alterations to the PRoW network;
- A list of PRoW proposed for extinguishment, with accompanying justification.

The Council's PRoW Team will be seeking a demonstrable net benefit to the public in terms of access to, and enjoyment of, the wider PRoW network across Cornwall. Therefore, it is

imperative to emphasise that Cornish Lithium should not solely extinguish PRow. In certain cases, it may be feasible to retain existing PRow alignments through appropriate structural accommodation, thereby avoiding the need for diversion or extinguishment.

For instance, Footpath 416/15/1 intersects a track designated for Utility Infrastructure. Should it be deemed necessary, the installation of a pedestrian bridge could be considered to facilitate safe and uninterrupted public access across the track.

We also note with interest Cornish Lithium's intention to establish a permissive community multi-use trail along the disused railway line, following the same route as the Indian Queens electrical connection corridor. The Council's PRow Team considers this a potentially valuable enhancement to the local access network. In this regard, we would encourage Cornish Lithium to explore the possibility of formally dedicating this route as a Public Right of Way.

Such a dedication would not only secure long-term public access but would also contribute meaningfully to the principle of delivering a net benefit to the public, which we consider essential in the context of this nationally significant infrastructure project. The formalisation of this route would enhance connectivity, promote active travel, and provide a lasting legacy of improved access for the local community and visitors alike.

The Council's PRow Team look forward to receiving the requested information in due course, to enable a more comprehensive assessment of the proposed development's implications for the PRow network.

Affected PRowS	Length Affected (m)	Category
416/13/1	261 m	Partially Affected Path
416/14/1	569 m	Fully Affected Path
416/14/2	470 m	Fully Affected Path
416/15/1	34 m	Partially Affected Path
416/17/1	685 m	Paths following Existing Tracks or Routes
416/18/1	111 m	Partially Affected Path / Path Skirting the Development Boundary
416/18/2	16 m	Fully Affected Path / Path Skirting the Development Boundary
416/2/1	412 m	Fully Affected Path / Path Skirting the Development Boundary
416/3/2	88 m	Fully Affected Path / Path Skirting the Development Boundary
416/3/3	134 m	Fully Affected Path / Path Skirting the Development Boundary
416/4/1	0 m	Path Skirting the Development Boundary
416/5/1	330 m	Partially Affected Path
416/5/2	816 m	Partially Affected Path / Path Skirting the Development Boundary
416/5/4	87 m	Fully Affected Path
416/6/1	86 m	Fully Affected Path
416/7/2	119 m	Fully Affected Path / Path Skirting the Development Boundary
422/108/1	22 m	Fully Affected Path / Path Skirting the Development Boundary
422/14/1	86 m	Fully Affected Path
422/14/2	84 m	Fully Affected Path
422/14/3	216 m	Fully Affected Path
422/15/1	115 m	Fully Affected Path
422/34/1	400 m	Partially Affected Path
422/49/1	364 m	Fully Affected Path
422/51/1	197 m	Partially Affected Path
422/52/1	120 m	Partially Affected Path
422/52/2	94 m	Fully Affected Path / Path Skirting the Development Boundary
422/69/1	460 m	Partially Affected Path
422/96/3	64 m	Partially Affected Path / Paths following Existing Tracks/Utility Infrastructure
422/98/1	108 m	Fully Affected Path
422/98/3	122 m	Fully Affected Path / Path Skirting the Development Boundary
Notes: <i>Fully Affected Path</i> = Path entirely within the development boundary; <i>Partially Affected Path</i> = Path partially within the development boundary; <i>Paths following Existing Tracks/Utility Infrastructure</i> = Paths that coincide with or follow tracks/access routes that may be repurposed; <i>Path Skirting the Development Boundary</i> = Paths that run along the edge of the development site.		
30 Affected PRow Links	Total Length: 6,670 m	

Environmental Protection – Contaminated Land

The Council's Environmental Protection – Contaminated Land team have reviewed the Environmental Impact Assessment (EIA) Scoping Report (ref: 0702319, dated: 20th June 2025). The report outlines that due to previous China clay workings and processing plants on site, a Phase 1 desktop assessment and a site walkover will be undertaken, which may identify the need for Phase 2 intrusive investigation. Environmental Protection can therefore support the scoping report.

Further information on the consideration of land contamination risks is contained within our Developers Guide and Information Requirements for Planning Applicants document which can be viewed here:

<https://www.cornwall.gov.uk/media/ikacq4kw/land-contamination-guidance-july-2021-v2-0-final.pdf>

The report states that Cornwall Council interactive map does not identify any declared contaminated or brownfield land within or in close proximity to the Site. There is the option to proceed with a pre-planning report under EH-TAP for contaminated land which can be supplied at a cost. Further information on this service can be found here:

<https://www.cornwall.gov.uk/media/dspazp0y/eh-tap-guidance-doc-may-17.pdf>

Planning ref: PA25/00652/PREAPP Our ref: CL25_000338 HD

Environmental Protection – Air Quality

Thank you for consulting the Council's Environmental Protection – Air Quality on the Environmental Impact Assessment (EIA) Scoping Report for the Trelavour Lithium Project.

We have reviewed the report, which is comprehensive and well-structured. We would like to raise the following points for consideration:

Air Quality Monitoring Locations

We note that Section 9.8.1.2 of the report refers to a baseline air quality monitoring study. We request that the monitoring locations are agreed with Environmental Protection prior to the commencement of any monitoring activities. This will ensure that the data collected is representative and suitable for assessing potential impacts on sensitive receptors.

Cumulative Impact Assessment

We acknowledge that the report commits to a cumulative effects assessment in Section 19, and this is also referenced in Section 9.8.2.12 for air quality. However, we note that the current scope does not explicitly include:

- The Parkandillick A2 industrial activity, and
- The SUEZ Cornwall Energy Recovery Centre (CERC)

Both of these are potential sources of air pollution in the vicinity of the proposed development. We recommend that these operations are included in the cumulative air quality assessment to ensure that all relevant sources of emissions are considered when evaluating potential impacts on local air quality and compliance with Air Quality Objectives.

Recommendation

We request that the Environmental Statement (ES) includes:

- A clear list of developments considered in the cumulative assessment.
- Justification for any exclusions.
- Confirmation that Parkandillick and CERC have been assessed where relevant.

We look forward to continued engagement as the project progresses and would welcome further discussion on the scope and methodology of the air quality assessment.

Historic Environment Planning - Conservation

Thank you for consulting HEP (Conservation) on this notification.

Our role is in advising on any physical or indirect impacts on designated heritage assets (principally listed buildings, conservation areas and registered parks and gardens).

Impacts on non-designated heritage assets and the archaeological resource is provided by our archaeology colleagues, any impacts on the OUV of the WHS provided by the WHS team.

The impacts on the setting any scheduled monuments (and grade I and II* listed buildings and registered parks and gardens) is provided by Historic England.

We have reviewed the applicants EIA scoping report dated June 2025 and offer the following advice at this stage;

The site is located in mid-Cornwall, within an active mining area, which has a rich and established history of mining. It is located to the immediate south and west of the village of St Dennis, and to the north of the village of Nanpean, which are historic industrial settlements.

The site is extensive, the proposals aim to repurpose the former Trelavour china clay pit into a commercial operation producing lithium, and would include:

- mining operations at Trelavour Pit
- processes to produce battery-grade lithium at the Trelavour Processing Plant;
- mining waste facilities and associated development, such as pipelines, transport access and conveyors.

At this stage the layout, height, scale and massing and any new built structures is not known.

The level of detail to be provided in the ES relating to the impact of the proposed development on the setting of the designated heritage assets (indirect impacts) are scoped in and described under chapter 13 of the EIA scoping report.

A 3 km study area of the site boundary will be used to identify potential indirect impacts upon heritage assets whose setting may be affected by the proposed development. A list of these assets has been provided.

It is also proposed that due consideration will be given to heritage receptors beyond 3 km that fall within a bare earth ZTV, as well as heritage receptors specifically identified for inclusion within any cumulative assessment by Historic England and ourselves. A table listing assets for inclusion or exclusion within the forthcoming setting assessment is proposed to be provided to Historic England and ourselves along with a rationale for any decisions made.

We are happy to provide further advice in this respect when more detailed information on the extent of the Trelavour Pit development and associated infrastructure becomes available and the ZTV is produced.

It is recommended that in conjunction with visual impact on setting the ES considers any potential physical impacts on designated heritage assets within or near the site. Dust and the vibration caused by the regular passage of HGVs and mineral extraction processes have the potential to physically damage the fabric of historic buildings and this should be assessed, particularly in the case of Parkandillick Engine House (grade II*), which is located within the site and the grade II Trerice Bridge, which is located within a utility corridor for the site.

Lead Local Flood Authority (LLFA)

The Lead Local Flood Authority has reviewed the details provided. These comments are in relation to sustainable drainage systems. The Environment Agency is better placed to provide comments in relation to Environmental Permitting.

Where possible the surface water drainage systems must have multifunctionality and not just a means of managing flood risk. Surface water drainage designs should aim to address all four aims of managing water quantity, improving water quality, where possible providing amenity and encouraging biodiversity.

Drainage systems must be sized to cater for the 1 in 100-year critical duration event, plus an allowance for the effects of climate change. The proposed systems must be designed to ensure that (unless an area is designed to hold/convey surface water) flooding does not occur to any building or part of a building, utility or plant room, pumping station or electricity substation during the 1 in 100-year peak rainfall event. Under the 1 in 100-year peak rainfall event conveyance systems (including pipework and swales) must aim to hold and convey flows without flooding. Flooding of any part of the site must not occur during the 1 in 30-year rainfall event.

A minimum allowance of 50% for the effects of climate change must be applied to the rainfall intensities within design calculations. The allowance must not be applied to the proposed discharge flow rates from any part of the site.

The proposed surface water drainage design should meet the requirements of the National Standards for Sustainable Drainage Systems (SuDS) (June 2025), so far as practicable.

A surface water drainage system management train must be demonstrated and shall be based on a robust water quality risk assessment which provides appropriate protection to sensitive receiving waters.

It is unlikely that Infiltration will be successful in this location due to the clay strata within the area. The Lead Local Flood Authority does not insist that infiltration testing is undertaken in this instance.

Monitoring must be undertaken to establish the extent of groundwater on the site. This should:

- Be targeted to the locations where surface water drainage features are to be positioned and shall be undertaken from the period from 1st November to 31st May.
- Establish that the peak groundwater level has been reached and has fallen continuously for two months. If this is not demonstrated monitoring shall continue for a full 12-month period.

- Inform the surface water drainage design and construction techniques.
- Groundwater should not rise to within 1m of the base of any drainage feature. Monitoring must be undertaken within 3m of the proposed location of each feature and at a depth of no less than 1.5m below the base depth. Continuous monitoring of each borehole is preferred, but where dip testing is used there must be at least one test of each borehole per week undertaken on the same day throughout the monitoring period.
- Overland exceedance flow routes must be fully considered. Consideration must be given to historic, known flood flow routes and those resulting from the works. Such flows and flood related issues are mitigated throughout the design. Designers must consider how these flows will be managed within the development and provide details of management features e.g. detention areas. Routes must remain unobstructed so that these work as predicted and mitigate flooding in extreme events.
- The applicant should note that Land Drainage consent could be required for works to and within the vicinity of watercourses.
- Cornwall Council are the consenting authority for ordinary watercourses. An ordinary watercourse is defined as any river, stream, brook, ditch, drain, culvert, pipe and any other passage through which water may flow which is not designated as Main River.
- Consent must be granted prior to any works starting and cannot be granted retrospectively. Works undertaken without consent could be subject to enforcement action. Further information can be found on the Cornwall Council – Land Drainage Consent webpage.
- Link <https://www.cornwall.gov.uk/environment/countryside/flood-risk/land-drainage-consent/>
- A Construction Phase Surface Water Management Plan will be required. Consideration should be given to the management of runoff from the site and the effects of silt and surface water on land, property, watercourses and the highway throughout the construction.
- Details of the proposed surface water drainage systems management and maintenance regime must be provided, along with a schedule and plan indicating the extent of the drainage assets managed.

Please reconsult the Lead Local Flood Authority if further information is submitted.

Cornwall Council – Ecology

Thank you for consulting the Cornwall Council Ecology Officer. The submitted documents reviewed in producing this response are:

- Environmental Impact Assessment (EIA) Scoping Report, Environmental Resources Management Ltd, PROJECT NO: 0702319 DATE: 20 June 2025 VERSION: 1
- Location Plan Dwg. No. 2212 dated 23.05.24

Chapter 11 of the EIA Scoping report: Ecology and Nature Conservation has been specifically reviewed together with Chapter 17: Waste and Chapter 4: EIA Process and Methodology.

The ecology officer is in broad agreement with the ecological methods, baseline and mitigation proposals.

The following planning policy framework has been included to signpost the applicant to relevant chapters which may have been overlooked as part of the EIA Scoping report. Specifically, these are policies G3 and G4 of the Climate Emergency Development Plan: Canopy and Local Nature Recovery Strategy (LNRS, March 2025). It is recommended that the LNRS is consulted to support a strategic approach to off-site BNG delivery (if required), most notably 'strategic significance'.

Planning Policy Framework

A number of Cornwall Council policy, strategy and guidance documents set out measures to inform development proposals within Cornwall. Ecology related documents are listed below and expanded upon in the Appendix A:

Cornwall Local Plan (CLP)

Climate Emergency Development Plan Document (CEDPD)

Policy G1 – Green Infrastructure Design and Maintenance

Policy G2 – Biodiversity Net Gain

Policy G3 - Canopy

Policy G4 – Local Nature Recovery Network

Cornwall and Isles of Scilly Nature Recovery Strategy (CNRS)

Cornwall's Planning for Biodiversity Guide

European Site Mitigation Supplementary Planning Document (SPD)

The Cornwall Local Plan (2016) sets out policies relating to the natural environment. Policy 23 relates to all aspects of the natural environment; Section 3 of this policy relates specifically to biodiversity. The policy sets out that developments should conserve, protect, and where possible, enhance biodiversity, giving appropriate weight to their level of importance. Opportunities should be sought within developments, to create networks of wildlife corridors linking County Wildlife Sites and other areas of biodiversity importance, helping to deliver the Cornwall Biodiversity Action Plan's actions.

In 2019, Cornwall declared a climate emergency and as such developed the Climate Emergency Development Plan Document (CEDPD). The CEDPD acts as an umbrella document informing Neighbourhood Development Plans, creating links between the Local Plan and the climate emergency. Policy G1 - Green Infrastructure Design and Maintenance should be central to the design of schemes, ensuring permeability of the site for wildlife and people and creating a multi-functional network of spaces and uses. All developments should be planned around the protection and enhancement of nature.

The Environment Act 2021 places a statutory obligation for Cornwall Council to produce a Local Nature Recovery Strategy (LNRS) every 5 years. Local Nature Recovery Strategies are based on the Lawton Principles that nature recovery should be “bigger, better and more connected”. The LNRS will steer coordinated local action to support the delivery of the national 25 Year Environment Plan – which aims to create a Nature Recovery Network of 500,000 hectares of additional habitat in England. The strategy describes opportunities and priorities for Cornwall to help nature recover. It is the Strategy that informs the detail of the map-based Local Nature Recovery Network.

The Local Nature Recovery Network (Policy G4 of the Climate Emergency Development Plan Document (CEDPD)) will be applied to all applications (unless excluded) validated after the date the strategy is adopted in March 2025. The strategy will support a strategic approach to off-site BNG delivery, most notably 'strategic significance'. Through our extensive mapping work, The Strategy seeks to direct development away from high value

land for biodiversity and incentivise delivery of offsetting in the areas with potential to facilitate nature recovery. The Strategy supports a strategic approach to off-site BNG delivery, agreeing locations to expand and connect existing habitats and provide nature-based solutions.

You can view the Local Nature Recovery Network and Strategy here: [CIOS LNRS](#)

General comments

The proposal will require careful consideration with regard to habitats and protected species. A suitably experienced ecological consultancy should be instructed to support the applicant in designing the final layout, to be informed by habitat and protected species surveys; applying the mitigation hierarchy; and implementing appropriate best-practice which meets National and Local Planning Policy.

The development should follow the principles detailed within the Cornwall Council Planning for Biodiversity Guide which is a material consideration in planning decisions.

Designated sites

Due to the proximity of the proposed development to a number of SACs, most notably St. Austell Clay Pits, Breney Common and Goss & Tregoss Moors and The River Camel, the Ecology Officer is in broad agreement that as per Chapter 11.8.1.11 (EIA Scoping Report) an sHRA is required to assess whether there are any significant effects on qualifying features of national sites (formerly European protected sites) that are likely to arise as a result of a Proposed Development.

More information can be found in the Cornwall Council European Sites Supplementary Planning Document.

Due to the proximity of the proposal to Statutory Designated Sites, consultation with Natural England will be required.

Habitats

A full UK Habitat Classification survey and habitat condition assessment of the site will be required to inform Statutory Biodiversity Net Gain Metric calculations. It is advised that these surveys are arranged at the earliest opportunity to ensure that baseline habitats are accurately mapped and classified to better understand and identify habitat retention, creation and enhancement opportunities.

Cornish hedges are a priority habitat and should be retained and enhanced where possible (in accordance with Cornwall Local Plan, Policy 23), particularly where they may be used by protected and priority species. The Cornwall Council Planning for Biodiversity Guide includes guidance on buffer zones for hedges, which should be considered at design stage. If the development will impact in any way upon these linear habitats and their use for protected and priority species, further surveys, mitigation and compensation are likely to be required.

Species

The Ecological Impact Assessment (EclA) referenced within the Scoping Report should collate the results of the Phase 1 and Phase 2 surveys and present any avoidance, mitigation and compensation measures for protected or priority habitats and species and be used to inform a BNG assessment of the scheme. All surveys will be expected to follow the most recent best practice survey guidance. Any deviations from best practice must be clearly rationalised. Justification for why any species have not been accounted for and reasons for why they have been scoped out of the assessment will also be expected to demonstrate these species have not been overlooked.

If protected species surveys and ecological impact assessment concludes that a European Protected Species Licence (EPSL) is required, an application must be made by a suitably qualified ecologist to Natural England, the consenting body for European Protected Species licences, before any development proceeds to ensure compliance with wildlife legislation. Cornwall Council are also unlikely to accept protected species surveys which are more than 18 months old. Please familiarise yourself with the CIEEM Advice Note on the age of ecological data: <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

Trees

Policy G3 of the Cornwall Council Climate Emergency Development Plan Document requires the provision of 15% canopy on major development sites either through retention of existing trees or the establishment of new canopy coverage (but excluding areas of the site that are priority habitat types). This should be demonstrated via the Cornwall Council Canopy Calculator tool.

Biodiversity Net Gain

The ecology officer supports the adoption of BNG as part of the EIA Scoping Report, particularly:

11.8.1.6: “Regardless of the legislative position, the Applicant is committed to achieving biodiversity net gain through the delivery of the Proposed Development through habitat retention, enhancement and creation with consideration to local priority habitats. The biodiversity gain objective is that the biodiversity value attributable to the development in question must exceed the pre-development value by a specified percentage.”

As noted within the Scoping Report, DEFRA recently opened consultation on its proposals to implement biodiversity net gain for nationally significant infrastructure projects. The consultation indicates that DEFRA proposes introducing BNG for infrastructure projects from May 2026. As such, it is encouraged that the proposal adopts a minimum 10% BNG uplift in accordance with existing legislation and local plans.

Required ecological documents

Below is a list of expected accompanying documents. This list is not exhaustive:

- Phase 2 protected/notable species/ habitats reports as outlined above, other surveys may be identified by the ecological consultant;
- Ecological Impact Assessment Report;
- Habitats Regulations Assessment;
- Statutory Biodiversity Metric;
- Biodiversity Gain Statement;
- Completed Canopy Calculator;
- Lighting impact assessment.
- Habitat Management and Monitoring Plan (HMMP);
- Sensitive Lighting Strategy (if lighting is proposed);
- Landscape and Ecological Management Plan (LEMP);
- Construction Environmental Management Plan (CEMP) to include all ecological protection, avoidance and mitigation measures to be implemented throughout the construction period.

Cornwall Council – Landscape

Landscape Comments 15.07.25

Planning reference: PA25/00652/PREAPP Scoping consultation

Proposal: Development Consent for The Trelavour Lithium Project PINS Ref: BC0310001

Applicant: Cornish Lithium G5 Limited

Planning Officer: [REDACTED]

Landscape Officer: [REDACTED]

Thank you for consulting the Cornwall Council Landscape Officer.

The submitted documents reviewed in producing this response are:

- Environmental Impact Assessment (EIA) Scoping Report, Environmental Resources Management Ltd, PROJECT NO: 0702319 DATE: 20 June 2025 VERSION: 1
- Location Plan Dwg. No. 2212 dated 23.05.24

Chapter 12 of the submitted report: Landscape and Visual Impact Assessment (LVIA) has been specifically reviewed together with Chapter 19 Cumulative and Combined Effects.

The Landscape Officer is in broad agreement with the proposed contents and methodologies, and would draw the applicant's attention to the Standing Advice set out below.

STANDING ADVICE

The following paragraphs consist of the landscape officer's standing advice, in relation to provision of an LVIA and CLVIA (Cumulative Landscape and Visual Impact Assessment) and associated information, which may provide additional useful guidance.

1. The proposed EIA should include Landscape and Visual Impact Assessment (LVIA) and Cumulative Landscape and Visual Impact Assessment. This documentation will need to be accompanied by a Landscape and Ecological Mitigation/Management Plan (which should run alongside the Habitat Monitoring and Management Plan, HMMP, a Biodiversity Net Gain deliverable) and include a De-Commissioning/ Restoration Plan and Construction Environmental Management Plan, as these documents will be key in determining landscape and visual effects in relation to the proposal.

2. While the Site is outside of those areas within Cornwall identified with dark skies, it is in a generally dark area and the Assessments should consider the impact of external lighting within the site together with daytime effects such as water vapour plumes from the plant, particularly during the winter period when the combination of colder air and a clear sky is more likely to create the conditions necessary for plume visibility.

3. All phases of development should be considered within the Assessments:

- Construction
- Operational
- Decommissioning
- Restoration

4. The initial study area for a development of this scale in this location should be agreed with the landscape officer following analysis of the Zone of Theoretical Visibility (ZTV).

5. The submitted ZTV / ZVI and proposed viewpoints should be overlaid onto the landscape constraints plan to aid assessment of the viewpoints.

6. Referring to the 2007 Cornwall Landscape Character Assessment (2022 review), the site is located within CCA27. St Austell or Hensbarrow China Clay Area with a Landscape Type LCT A: China clay workings. The LVIA should assess the development's impact on the Site and its landscape features, the 'local landscape' context and wider character area. This should include the potential impact on local roads and lanes used to access the Site.

7. The application documentation should be supported by viewpoints which cover a representative sample of the views from the immediate area and the wider landscape setting through 360 degrees. Viewpoints should not only be selected from roads and lanes, but should also include public vantage points, historic features, tourist attractions/facilities, residential areas and farmsteads, public rights of way and areas of Open Access Land / Common Land within the Site and the landscape around the site.

8. Candidate viewpoints should be agreed with the landscape officer, with further agreement required to form the final viewpoint selection and further selection of views suitable for photomontage.

9. Additional viewpoints may be required in relation to the assessment of cumulative landscape effects (see below).

10. It is appreciated that it may be difficult to coordinate with weather windows, but every effort should be made to avoid misty images which can make assessment of photographic images difficult.

11. Visual representation of development proposals should comply with Landscape Institute guidance: Technical Guidance Note 06/19 published 17 September 2019.

12. All photo views and visualisations need to be clearly labelled for the lay person detailing how the image is to be printed and viewed, showing viewing distances and correct viewing position. They should include the angle of view of the image and not include views over 180 degrees as these may distort the image and do not represent what would be seen by an individual at that viewpoint. All visual material needs to show the site clearly outlined to enable the viewer to clearly identify the extent of the site within the photo view.

13. The submission must make clear that the images should not be assessed on a computer screen. The images must clearly state the scale of paper on which to print the images (normally A3 for a single frame image) to best replicate what the human eye would perceive were they to stand at that viewpoint.

14. If panoramic images are to be used to illustrate landscape context, then the submission should also include 50mm single frame images centred on the site to more clearly represent how the eye would perceive the view on site. 15. Submissions should illustrate the development in the centre of the image and be free from foreground features, such as trees, poles and posts which serve to partly obscure or foreshorten the view.

16. Wire frames are not to be relied upon to convey key landscape context as they are difficult for the lay person to interpret.

17. For selected views (where the Site is clearly visible) photomontage images will be expected, to aid the lay person in accurately understanding the potential visual impact of the development.

18. Where landscape planting mitigation measures are illustrated by photo visualisation, the images should accurately show the impact of planting at year 1, year 10 and year 20.

Cumulative Landscape and Visual Impact Assessment (CLVIA)

19. The CLVIA should assess the potential cumulative effects this proposed application would create in addition to and in combination with operational and consented developments, in addition to those under consideration in the planning system. Consideration should be given to other large scale energy and extraction developments within the landscape. A detailed cumulative impact assessment will need to be prepared which looks at the potential visual effects and those on landscape character in combination and sequentially as you move through the landscape. Sequential assessments need to look at both primary and minor routes in the surrounding landscape as well public footpaths.

20. The list of cumulative sites and cumulative impact assessment radius is to be agreed with Cornwall Council officers.

21. The use of Cumulative Zones of Theoretical Visibility are beneficial in assessing the areas which are subject to the potential effects resulting from multiple large scale developments in the landscape.

22. The cumulative impact assessment should be supported by visualisations which illustrate the potential cumulative visual effects, including the use of photomontage. Viewpoints should be agreed with the landscape officer prior to submission of the assessment.

23. Visualisations to accompany the cumulative assessment need to illustrate operational developments as well as those with consent (but not constructed) on the same image and be supported by a further accompanying image (possibly a wireframe) illustrating the following together:

- operational developments,
- those with consent but not constructed,
- those applications under consideration by Cornwall Council.

24. Viewpoints used to provide this information may or may not be the same locations used to illustrate the LVIA. These visualisations should follow the same presentation format as that of the LVIA detailed previously.

25. Should there be other large scale energy or extractive developments at the screening stage within the surrounding landscape, it will be at the discretion of the Case Officer as to whether these developments are included within the cumulative impact assessment.

Cornwall Council – Arboriculture

Arboriculture Comments 15.07.25

Planning reference:PA25/00652/PREAPP Scoping consultation

Proposal: Development Consent for The Trelavour Lithium Project PINS Ref: BC0310001

Applicant: Cornish Lithium G5 Limited

Planning Officer: [REDACTED]

Forestry Officer: [REDACTED]

Thank you for consulting the Cornwall Council Forestry Officer.

The submitted documents reviewed in producing this response are:

- Environmental Impact Assessment (EIA) Scoping Report, Environmental Resources Management Ltd, PROJECT NO: 0702319 DATE: 20 June 2025 VERSION: 1
- Location Plan Dwg. No. 2212 dated 23.05.24

Arboriculture is not specifically addressed in the Scoping Report and there are few references to trees or woodland throughout the document.

The tree resource across the proposed development site is extensive, well-developed and constitutes a valuable resource in terms of landscape character, visual amenity and ecological value. As such we presume that a number of tree-related issues will be covered by the landscape and ecology assessments, however our comments below seek to provide guidance on a number of policy areas and how we would recommend that the applicant addresses more detailed arboricultural issues.

Cornwall as a Local Authority area ranks the lowest in the Southwest region for canopy cover, being below both the regional **and** national average. Despite its rural landscape, Cornwall rates in the bottom 20% of Local Authority areas in England for tree cover.

As such, we would welcome a commitment to preserving, enhancing and mitigating impacts upon trees, woodlands and Cornish hedges and the canopy and benefits they provide as a result of the scheme. This should be secured, wherever possible as a DCO requirement and should demonstrate compliance with National and Regional policy as well as development and woodland management best practices for similarly challenging sites.

The scoping document and subsequent strategies should ensure that arboricultural benefits and requirements are addressed collaboratively with ecology and landscape matters to create synergy between the three inter-related disciplines resulting in collaborative and resilient outcomes.

The Cornwall Council Climate Emergency Development Plan Document plays an important role in protecting and enhancing treed landscapes and should its implementation across the Trelavour scheme is of paramount importance. Major developments must provide or retain at least 15% canopy cover and assessment of existing canopy will be required, considering the 30+ years of natural and assisted regeneration that has established across the site and noting several parts of the site have been naturally regenerating since the 80's.

Where development (e.g. of buildings and infrastructure) is proposed, trees shall be assessed in line with BS5837 and the identified constraints will influence the design. Trees are a material consideration in the planning process and designs should clearly demonstrate that they have responded appropriately to constraints posed by trees, hedges and woodland habitat.

Tree management strategies should favour retention in the first instance and follow an appropriate mitigation hierarchy where retention is not possible with tree losses justified, and retained trees protected. A tree specific survey should aim to identify wooded habitats and their relative diversity and quality and propose long term protection measures to conserve, enhance and buffer these features. Designs should be flexible wherever possible to incorporate these important landscape features throughout the operational area.

Key individual or groups of trees as well as hedges and woodlands will require assessment and suitable protection of their crowns and rooting structures, assessed in line with BS5837:2012, and delivered with long term/permanent protection in mind to safeguard from operational impacts.

The project will require the construction of mass infrastructure. Considering the longevity of the project, temporary protection measures will only be appropriate where demolition and construction is proposed and should be specified by an arboricultural consultant in line with British Standards.

Utility connections proposed to breach historic Cornish hedges. These routes (presumed for electricity cable connections), should utilise existing hedge breaks or use non-destructive methods to pass under hedges. Such specific operations will be guided by detailed operational instructions contained within an Arboricultural Method Statement or as a distinct section within the LEMP/CEMP.

There are opportunities for new habitat creation that should be explored with diversity, resilience and connectivity underpinning their design. Treed habitat should also be retained and enhanced where it provides meaningful visual and acoustic screening or to protect from spread of airborne particulate matter.

Longterm habitat creation plans, particularly on waste material sites, should draw on the wealth of arboricultural experience of those projects that have come before to ensure effective establishment of new planting on these challenging sites.

A method for accountability and additional compensation (via planting or offsite) for project deviations for unplanned operations e.g. draining infrastructure into treed areas should be devised.

Arboricultural monitoring and compliance checking methodology and schedule should be devised to ensure construction and development is undertaken in line with arboricultural recommendations and national standards. Appointment of suitably qualified and experienced environmental clerk of works responsible for arboricultural monitoring shall be required.

There is a need for a minimum exclusion zone (Section 11.5.1.2) around woodland as with many smaller trees forming these habitats, Root Protection Area (RPA – BS5837:2012) calculations will likely be low and will not afford adequate protection to the habitat. 10 metres should be considered the absolute minimum. How these areas can be permanently protected should be resolved. **“establishment of clearly defined working areas that exclude works around sensitive features, woodland, and buffers for root protection zones...”**

The document acknowledges the importance of wooded berms and embankments for visual screening. Retention of these should be a priority and enhancement measures should be explored to improve species diversity and connectivity. Opportunities for enhancement of buffer/screening habitat should be explored and specified particularly around areas near settlements and recreational routes.

Where hydrological impacts are likely, e.g. waterlogging, the impacts upon existing woodland habitat should be considered as many species cannot tolerate such changes to their rooting environment. Similarly, where standing water is likely to be created or permanent wet features, opportunities for establishment of wet woodland may be identified.

Recommended future work: Canopy assessment

Tree survey and tree and woodland quality assessment

Constraints plan

Impacts assessment

Tree Protection Strategy

Baseline habitat map and quantitative assessment

Mitigation strategies

Habitat creation opportunities mapping (incorporating trees wherever ecologically appropriate).

Soft landscaping strategy

Cornwall Council - Local Planning Authority

The Council's Minerals & Waste specialist planning officers have reviewed the submission documents and make the following comments on behalf of the Local Planning Authority.

With reference to the site planning history in section 2.3.3, there is reference to the existing planning consents, and it is noted that much of the proposed area has extant mineral planning permission. It would be really useful to include a drawing to show the proposed site and the areas covered by the extant planning permissions.

The Council has adopted a Mineral Safeguarding Development Plan Document which sets out areas of mineral resource and infrastructure which are safeguarded from potential sterilisation by other forms of development.

Whilst in many instances the proposed development would not conflict with the policy set out in the DPD, it is noted that there are numerous references to the proposed use of Goonvean and Treviscoe Pits for waste material. The Scoping Report notes that these pits are flooded, however, it is important to state that although they are currently flooded, china clay and allied minerals may well remain within the pits. It is therefore vital that an independent resource assessment of the potential sterilisation as a result of the proposed development is carried out by a suitably qualified person, not just in terms of the proposed areas for waste disposal, taking into account the requirements of policy MS1 of the DPD. This should also include assessment of any implications for the existing china clay operations. Whilst it is noted that the impact on mineral resources has been scoped out of the EIA, the LPA consider that the mineral resource assessment should be submitted as part of the planning application. Where new development, be that extraction of lithium, plant development or tipping of overburden/waste, is proposed within an Operational Area, consideration should be given to the prior removal of the china clay resources, where this resource is assessed as being of value, to ensure that china clay resources are not sterilised.

With regard to the construction phase, it is stated, in paragraph 2.6.2.6, that two historic conical tips are to be removed, it is considered that these contribute to the landscape character of the area and the impact of their removal should be carefully considered.

The Council have also adopted a Supplementary Planning Document on the Restoration and Tipping Strategy in the St Austell China Clay area - [St Austell China Clay Restoration and Tipping Supplementary Planning Document \(SPD\) - Cornwall Council](#). This SPD provides operational and technical guidance and sets out a strategy for future restoration in the china clay area. The proposed development should have regard to the principles and strategy set out in the SPD.

Section 3.4 of the Scoping Report sets out the relevant planning policy, it is noted that reference to the following documents are omitted:

Cornwall's Climate Emergency Development Plan Document (CE DPD) [Climate Emergency Development Plan Document \(DPD\) - Cornwall Council](#)

Cornwall's Minerals Safeguarding Development Plan Document (MS DPD) [Minerals Safeguarding Development Plan Document - Cornwall Council](#), and

St Austell China Clay Restoration and Tipping Strategy Supplementary Planning Document (SPD) - [St Austell China Clay Restoration and Tipping Supplementary Planning Document \(SPD\) - Cornwall Council](#). In paragraph 3.4.3.15, relevant policies from the CE DPD are discussed, it is suggested that the policies relating to biodiversity net gain, tree and canopy cover as well as transport are also relevant.

In section 8.2, the Council would query reference to Minerals Policy Statement 2; guidance on noise from mineral working is set out in <https://www.gov.uk/guidance/minerals#Noise-emissions>



Section 12.2 should make reference to the St Austell China Clay Restoration and Tipping Strategy Supplementary Planning Document (SPD) - [St Austell China Clay Restoration and Tipping Supplementary Planning Document \(SPD\) - Cornwall Council](#).

In paragraph 12.3.2.6 reference is made to the sky tips in the study area, these are prominent in the landscape and as such are an important landscape feature, they are recognised in a 2006 study 'Sky Tips in the St Austell China Clay District - An Archaeology Assessment' by John R Smith. Therefore, the potential removal of such tips needs to be carefully considered.

The LPA welcome the commitment to provide Biodiversity Net Gain, this should take into account any restoration undertaken in the area to date.

I trust this representation is useful, please do not hesitate to contact should you require any further information.

Yours sincerely


Principal Development Officer – Minerals & Waste
Planning & Housing
Email: @cornwall.gov.uk

Appendix A – Planning Policy, Strategy and Guidance

Cornwall Local Plan

A planning policy framework for Cornwall is set out in the Cornwall Local Plan (CLP) which includes key policies in relation to protecting and enhancing the distinctive landscapes of Cornwall:

Policy 1 - Describes the presumption in favour of sustainable development as set out in both the National Planning Policy Framework and further policies of the CLP, which improves the economic, social and environmental conditions of the area taking into account the development's location, layout and design.

Policy 2 - Spatial Strategy, describes the need to respect and enhance the quality of place, the special character of Cornwall and importantly highlights that both designated and undesignated landscapes are important. The policy further describes the need to consider the impacts of the development on the landscape, considering its character and the setting of settlements, including identifying the value and sensitivity of the landscape.

Policy 12 - Design, directs the creation of places with their own identity, promoting local distinctiveness and the need for the development to respond to the landscape setting in terms of scale, density, layout, height and mass.

Policy 23 – Natural Environment, forms a key policy describing the need to sustain local distinctiveness and character, protecting and enhancing Cornwall's environmental assets, recognising and respecting the landscape character of both designated and undesignated landscapes, taking into account the sensitivity and capacity of the landscape, considering cumulative impact and the wish to maintain dark skies and tranquillity in areas that are relatively undisturbed, using guidance from the Cornwall Landscape Character Assessment and supported by the descriptions of Areas of Great Landscape Value. The mitigation hierarchy is included in the policy, setting out the need to avoid, reduce, mitigate and compensate for landscape impacts, enabling net gains by designing in landscape and biodiversity features and enhancements.

The policy highlights that developments should avoid adverse impacts on existing landscape and biodiversity features as a first principle, proportionately mitigating unavoidable harms, with compensation being the last resort if full mitigation cannot be provided.

Policy 25 – Green Infrastructure, requires development proposals to contribute to the creation of new and enhancement of existing interconnected networks of blue green infrastructure, for the benefit of people and nature, ensuring that clear arrangements for long term maintenance, management and enhancement are in place.

Climate Emergency Development Plan Document (CEDPD)

The CEDPD <https://www.cornwall.gov.uk/media/uxgjk4jn/climate-emergency-dpd.pdf> adds to the Cornwall Local Plan to help the Council respond positively to the Cornwall Council declared Climate Emergency. Key ecology related policies are:

Policy G1 – Green Infrastructure Design and Maintenance

Policy G2 – Biodiversity Net Gain

Policy G3 - Canopy

Policy G4 – Local Nature Recovery Network

Cornwall Design Guide

Achieving quality in development for people, wildlife & the environment

https://www.cornwall.gov.uk/media/vzkd4iaj/cornwall_design_guide_v2-0.pdf supports the Cornwall Local Plan and Climate Emergency Development Plan Document, setting out aspirations for design quality in recognition of Cornwall's distinctive landscape, historic and cultural characteristics.

Cornish Hedges

[Cornish hedges - Cornwall Council](#)

Cornish hedges are Cornwall's premier landscape character features and, together with their associated vegetation play an important role in providing a variety of habitats and habitat connectivity across the County. Links to all aspects of Cornish hedges, their value and importance and how they can be sustainably incorporated into new developments can be found through the following links:

- (i) What is a Cornish hedge [cornwall.gov.uk/media/0cybjw4h/1-what-is-a-cornish-hedge.pdf](https://www.cornwall.gov.uk/media/0cybjw4h/1-what-is-a-cornish-hedge.pdf)
- (ii) The value of a Cornish hedge [cornwall.gov.uk/media/hmnptwqc/2-the-value-of-a-cornish-hedge.pdf](https://www.cornwall.gov.uk/media/hmnptwqc/2-the-value-of-a-cornish-hedge.pdf)
- (iii) Cornish hedges and local distinctiveness [cornwall.gov.uk/media/ef2h55fp/3-cornish-hedges-and-local-distinctiveness.pdf](https://www.cornwall.gov.uk/media/ef2h55fp/3-cornish-hedges-and-local-distinctiveness.pdf)
- (iv) Cornish hedges and development [Cornish hedges and development](#)
- (v) Cornish hedges and the Hedgerows Regulations [cornwall.gov.uk/media/udwegvf3/5-cornish-hedges-and-the-hedgerows-regs.pdf](https://www.cornwall.gov.uk/media/udwegvf3/5-cornish-hedges-and-the-hedgerows-regs.pdf)
- (vi) What to plant on a Cornish hedge [cornwall.gov.uk/media/4zyp1b5k/6-what-to-plant-on-a-cornish-hedge.pdf](https://www.cornwall.gov.uk/media/4zyp1b5k/6-what-to-plant-on-a-cornish-hedge.pdf)

(vii) Cornish hedges: further information [Cornish hedges: useful links for further information](#)

Cornwall's Planning for Biodiversity Guide

The Biodiversity Guide (updated 2023) explains how to deal with biodiversity within the planning process. It gives advice on every aspect of biodiversity within planning. This includes statutory protections, planning legislation, hedgerows, bat and bird boxes and survey requirements. It explains how to secure net gain within the National Planning Policy Framework.

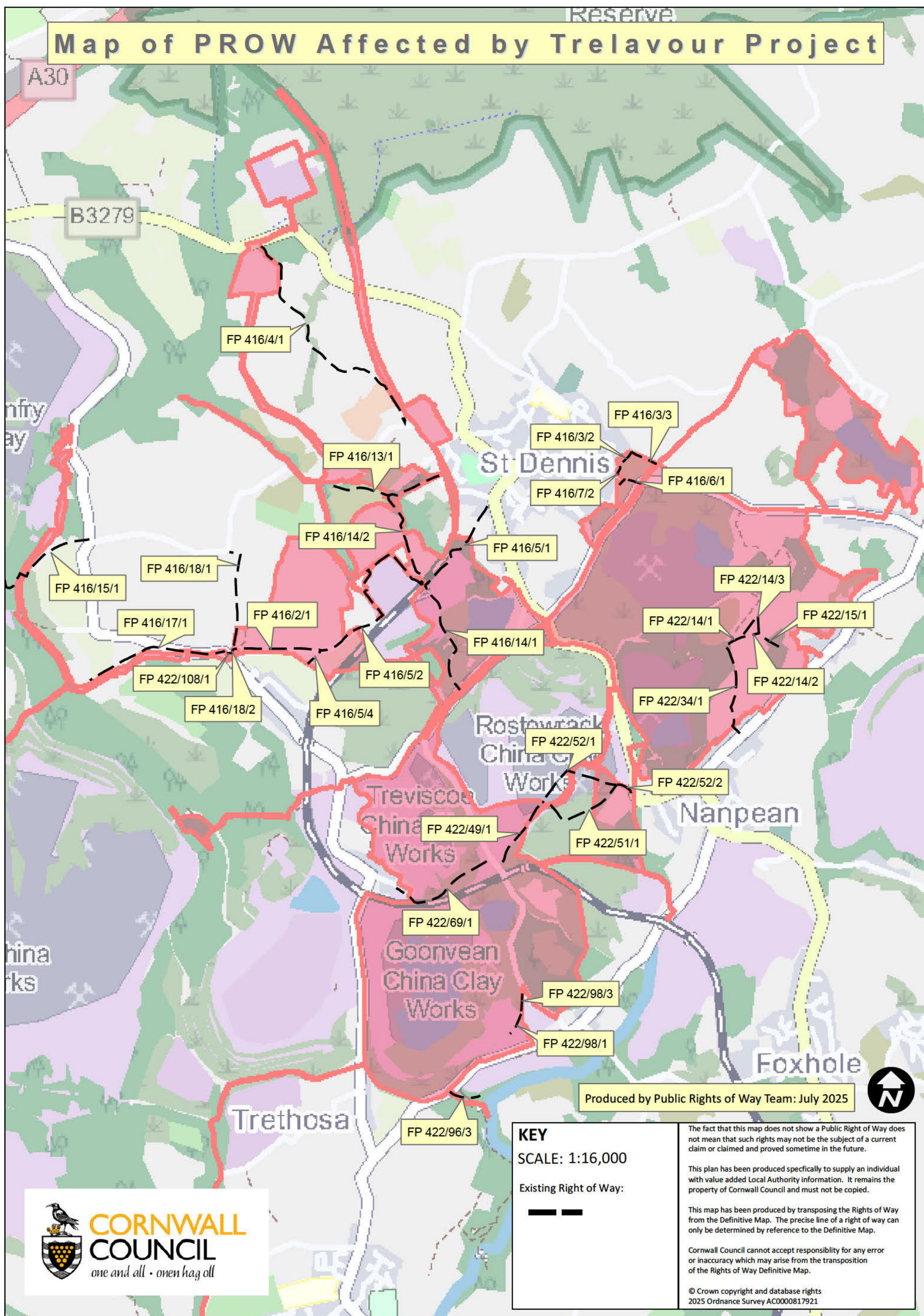
<https://www.cornwall.gov.uk/media/v1roqk0x/planning-for-biodiversity-v15.pdf>

European Sites Mitigation Supplementary Planning Document

[cornwall.gov.uk/media/wmvnoxzz/european-sites-mitigation-spd-july-2021-marine-and-terrestrial-sites.pdf](https://www.cornwall.gov.uk/media/wmvnoxzz/european-sites-mitigation-spd-july-2021-marine-and-terrestrial-sites.pdf)

European legislation requires appropriate mitigation before planning applications, that would otherwise cause harm to European wildlife sites, including in combination with others, can be approved. The requirement for this is reinforced further in the Local Plan: Strategic Policies Policy 22: European Protected Sites - mitigation of recreational impacts from development. The evidence for this can be complex and a significant burden on smaller scale developments. It can also be difficult to achieve realistic mitigation strategies in isolation. In agreement with Natural England, Cornwall Council has carried out recreational use surveys and devised a strategic mitigation program. Applicants are encouraged to use this as a standard method, evidence base and mitigation. This is applicable where the only impact on European wildlife sites is through increased recreational use.

Map of PROW Affected by Trelavour Project



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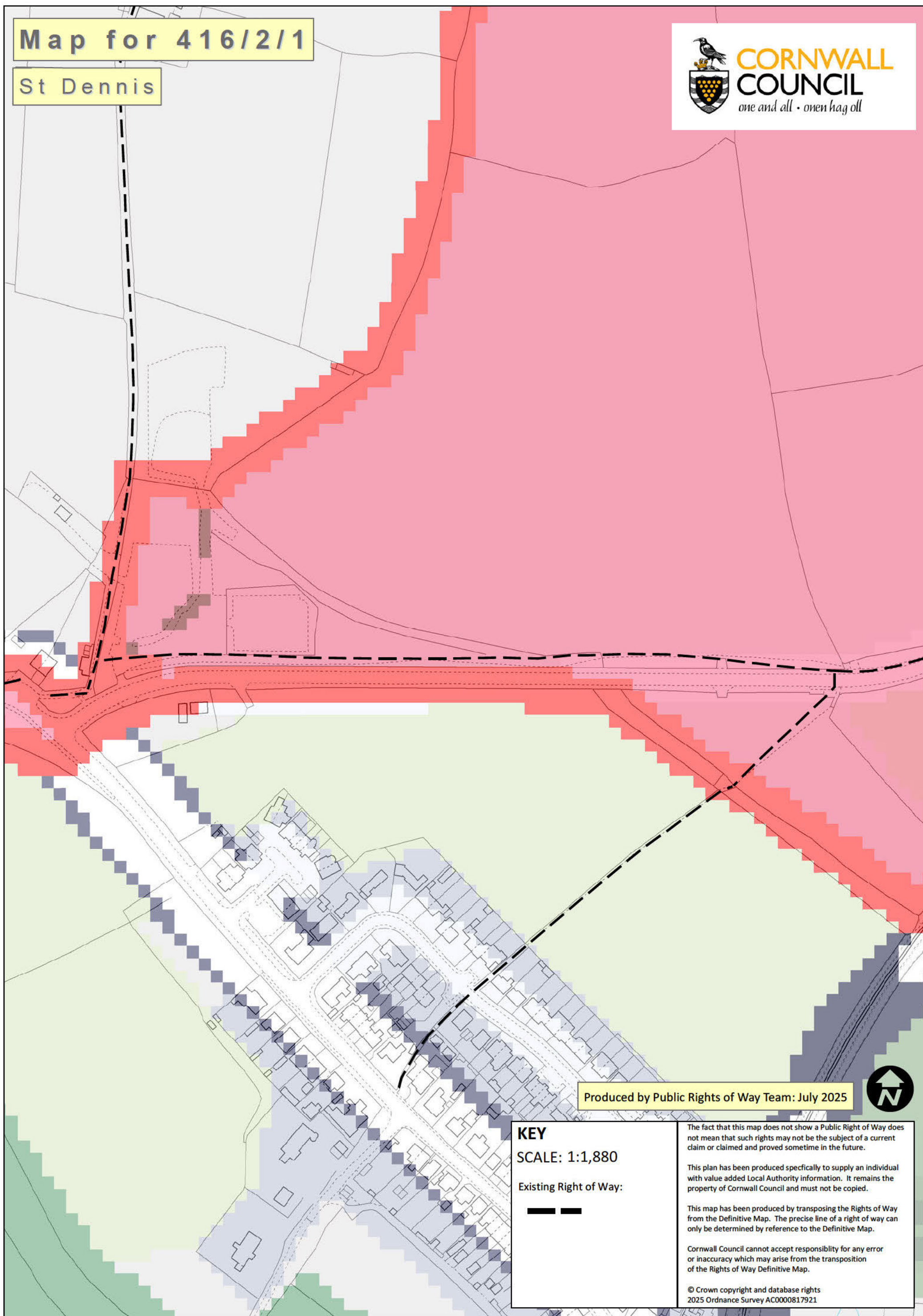
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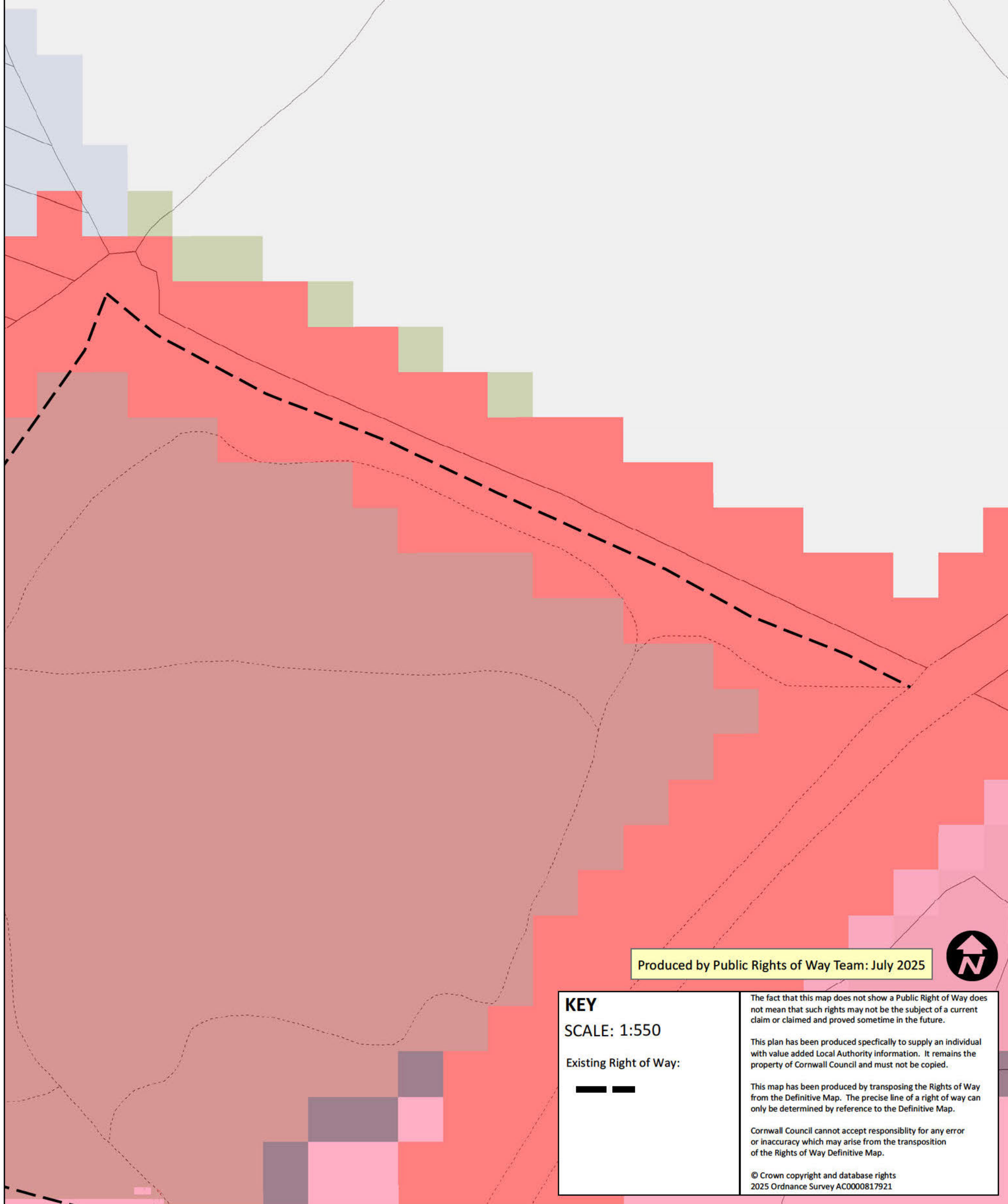
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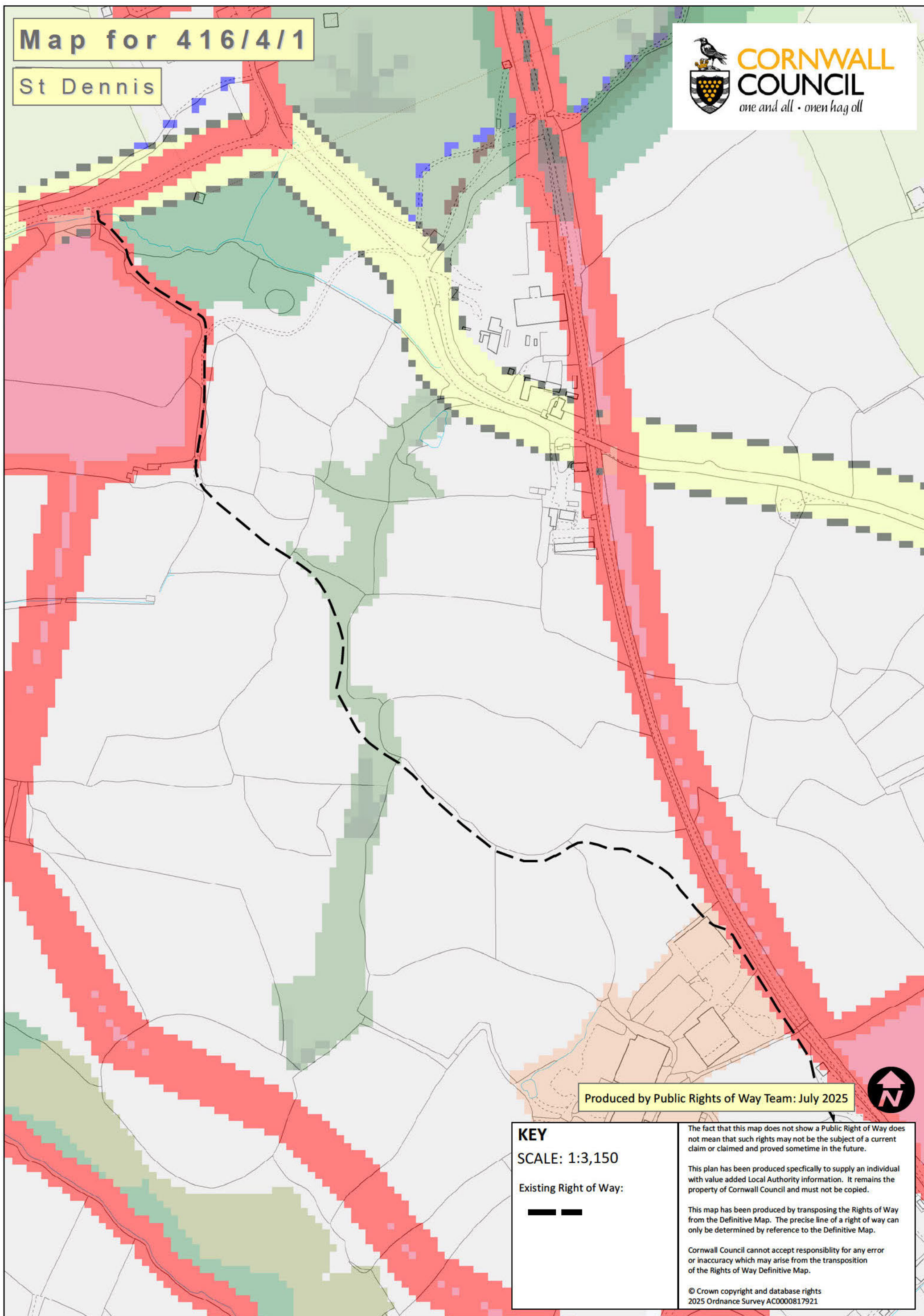
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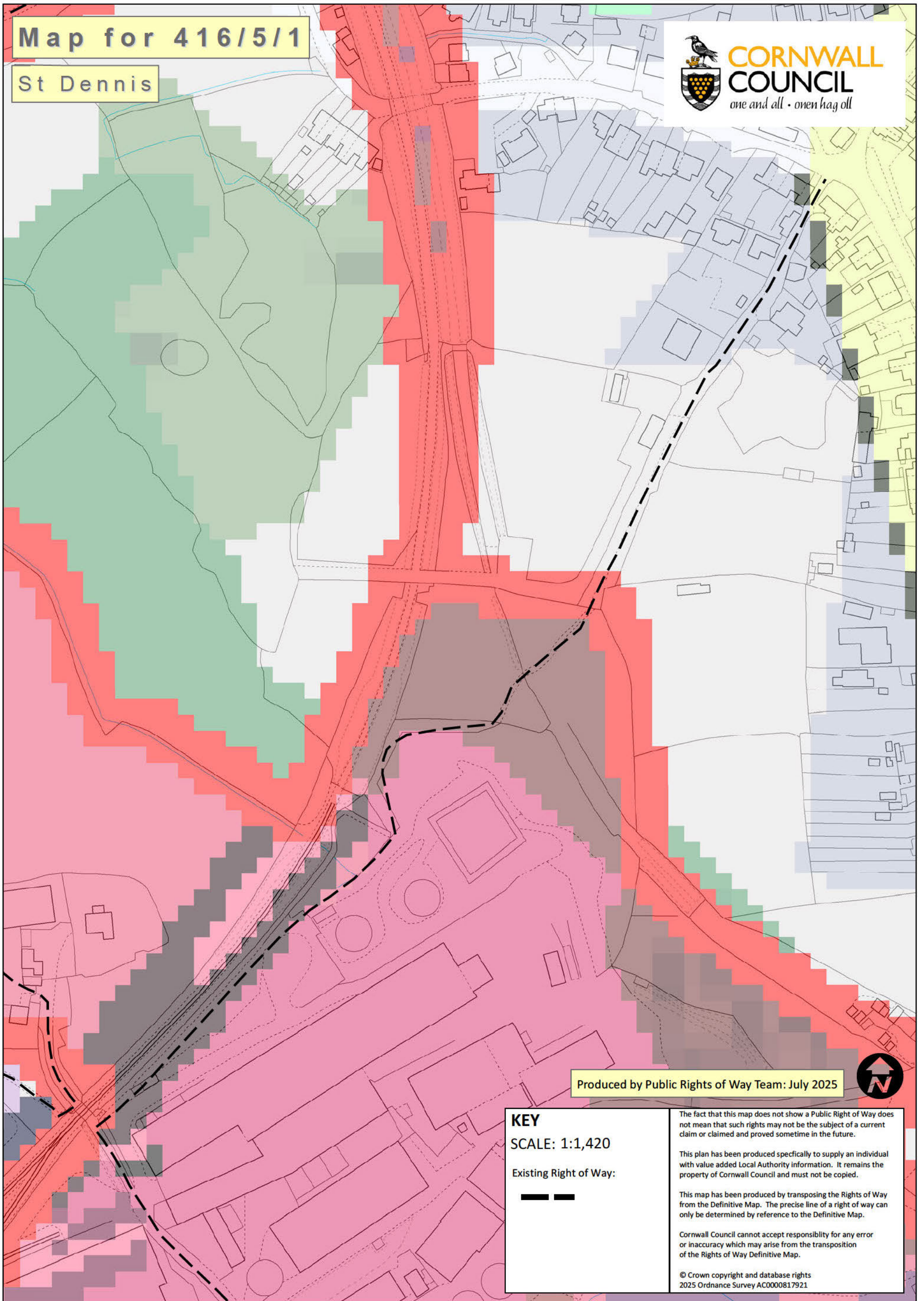
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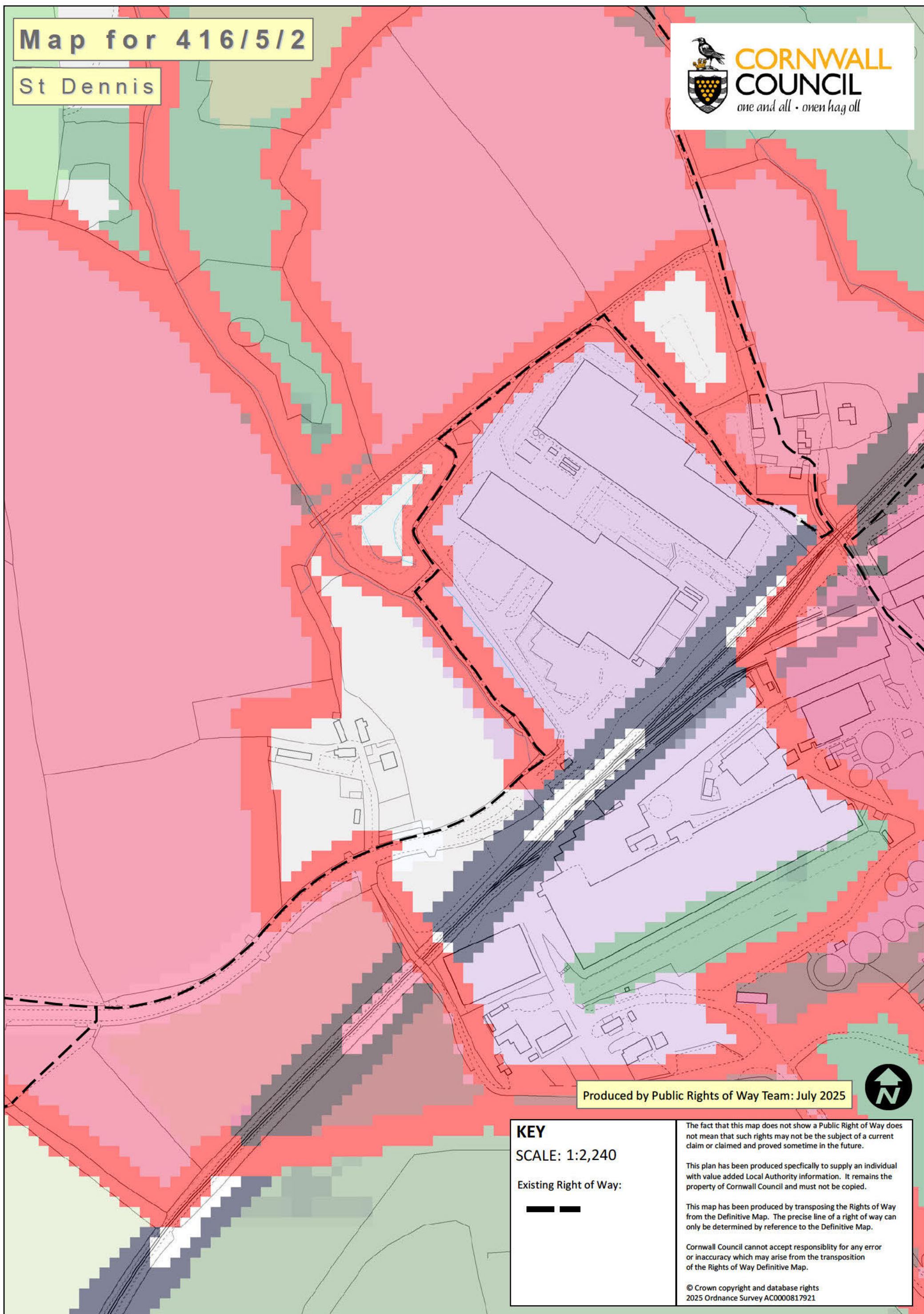
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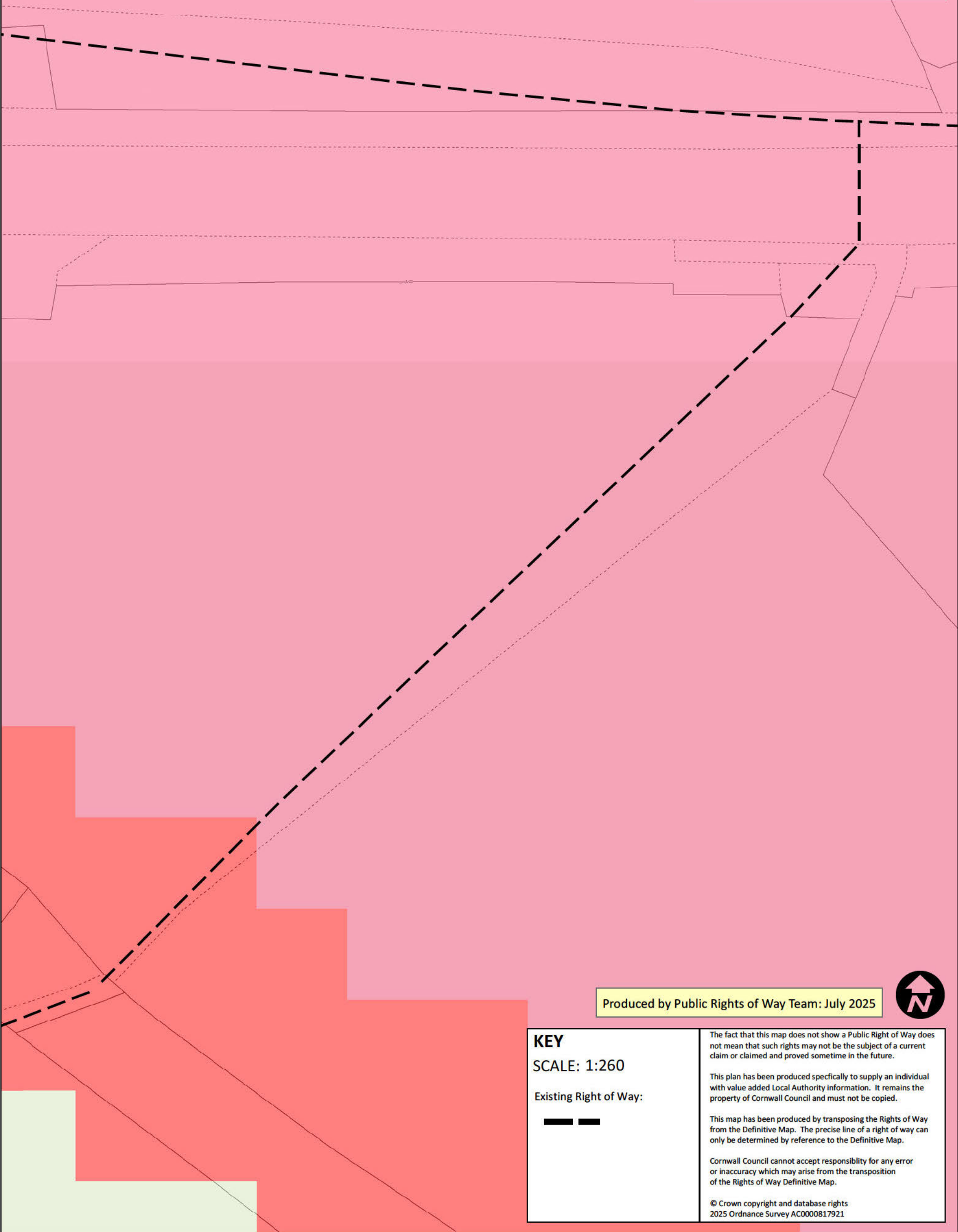
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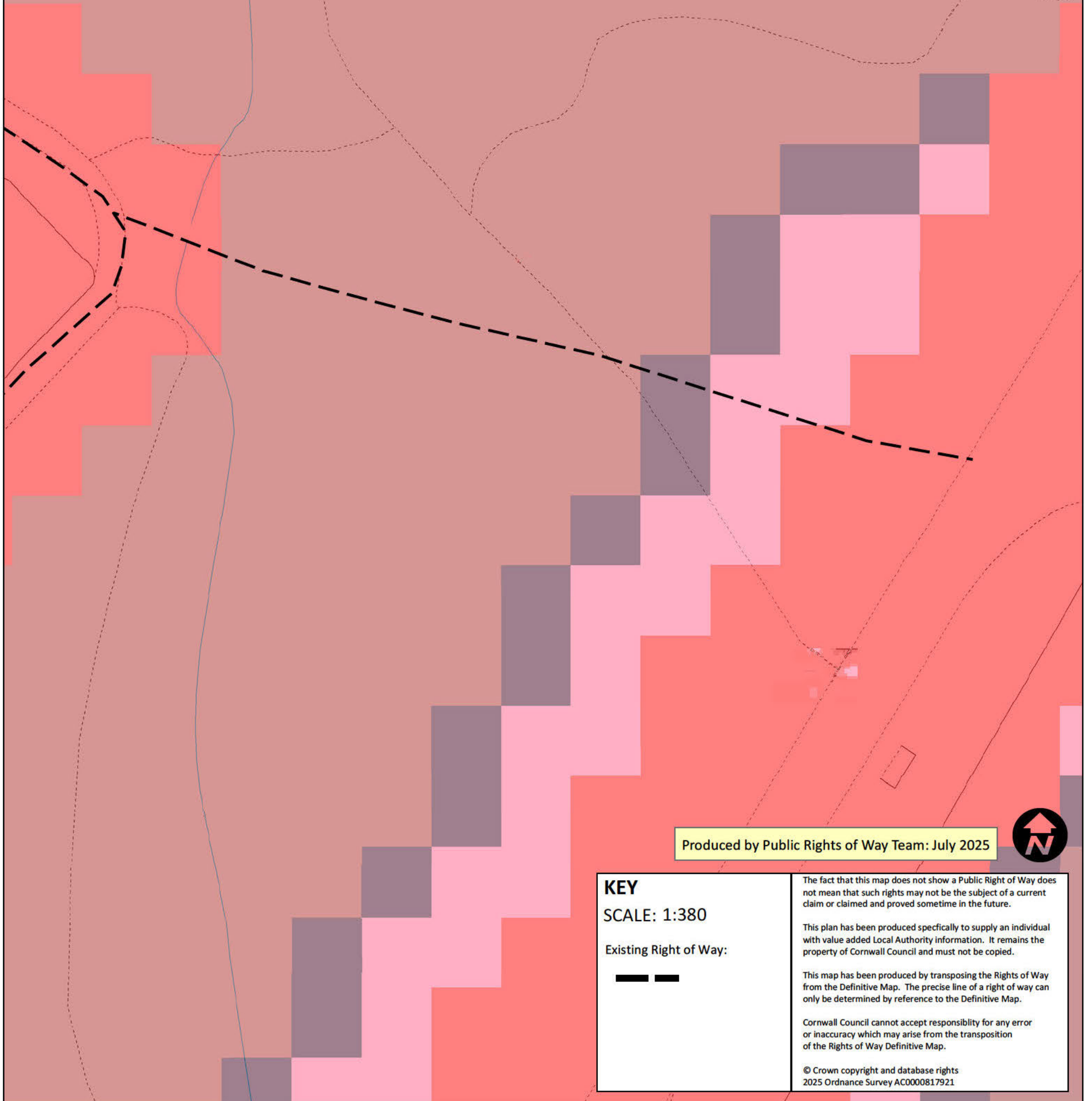
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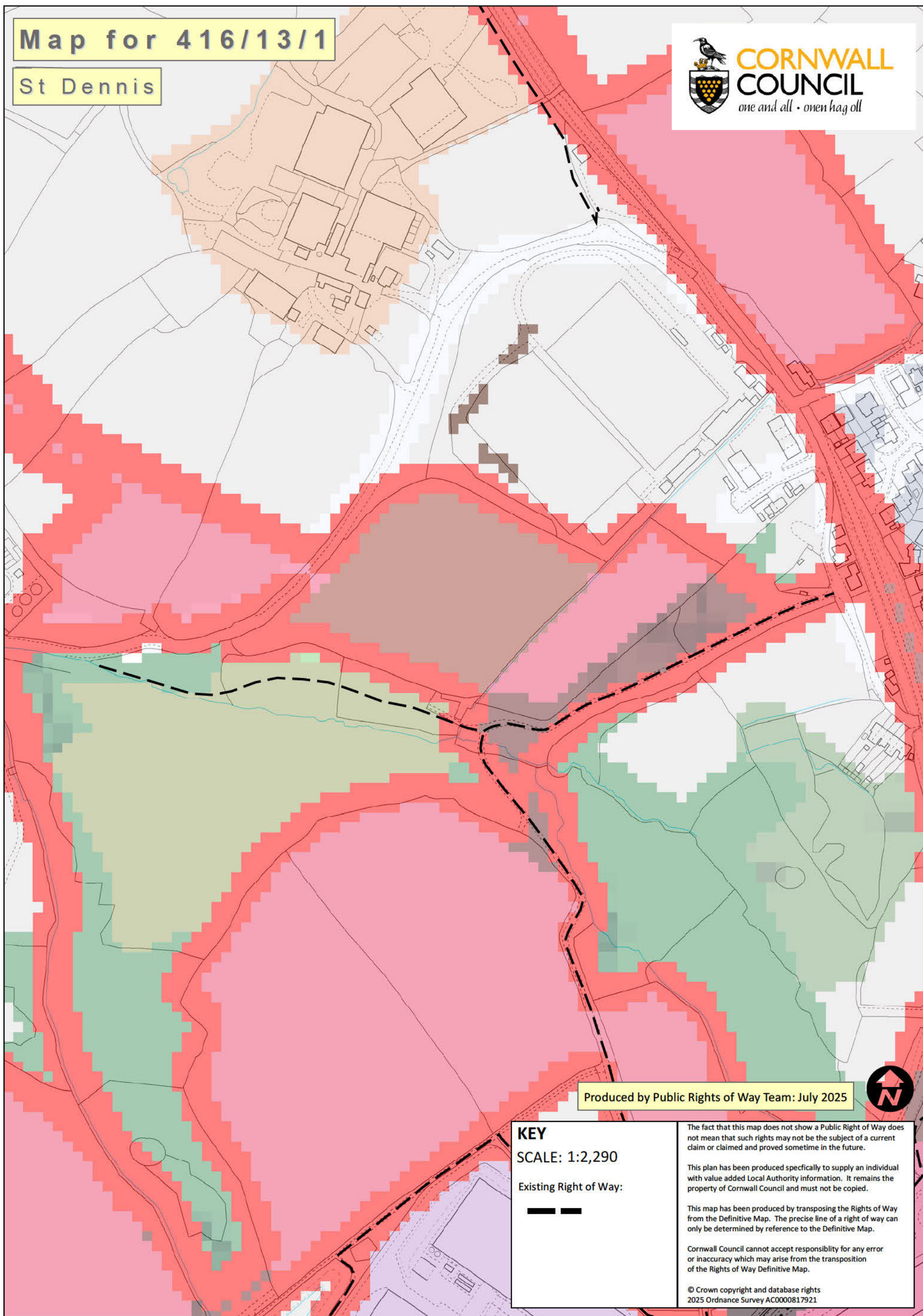
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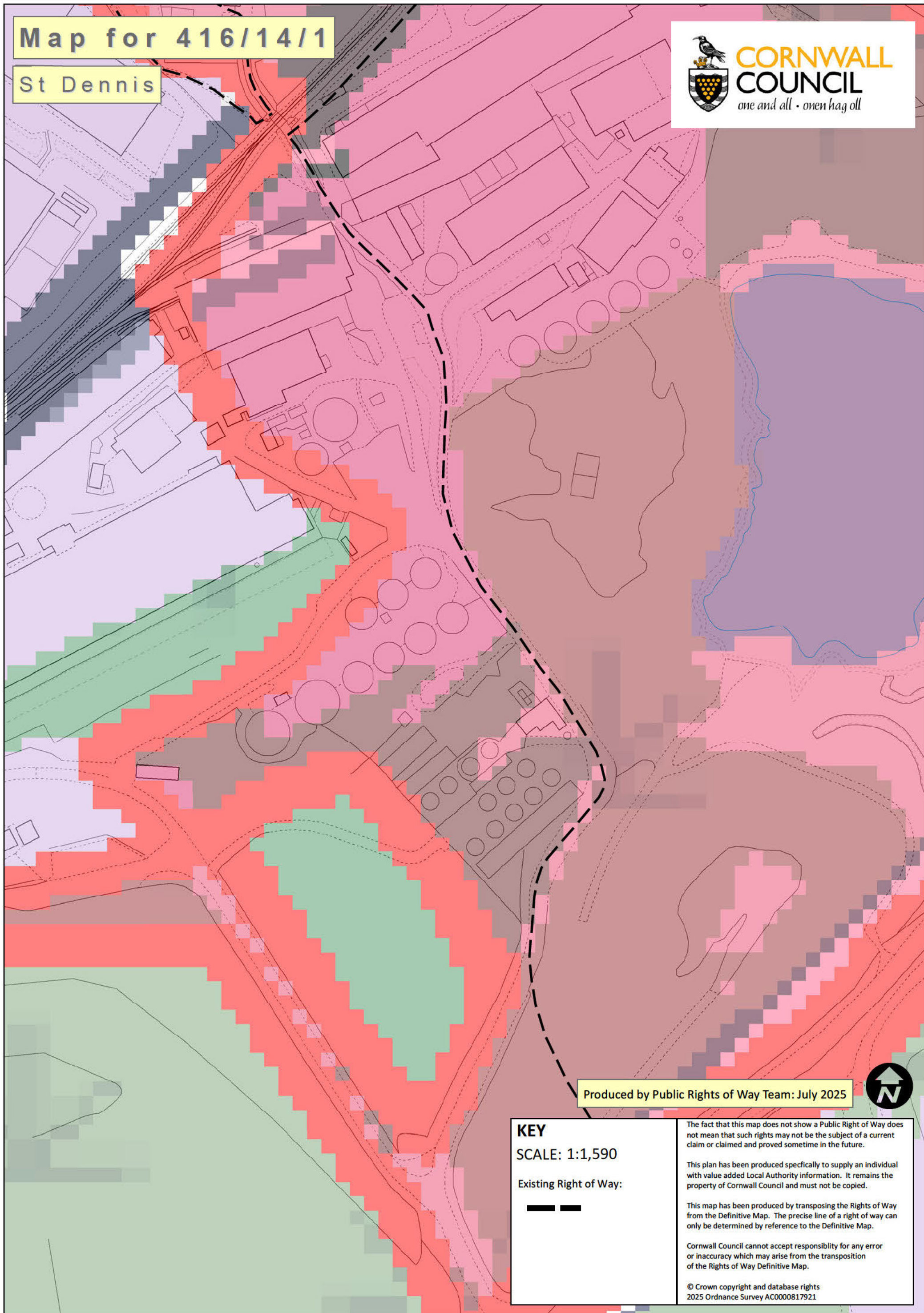
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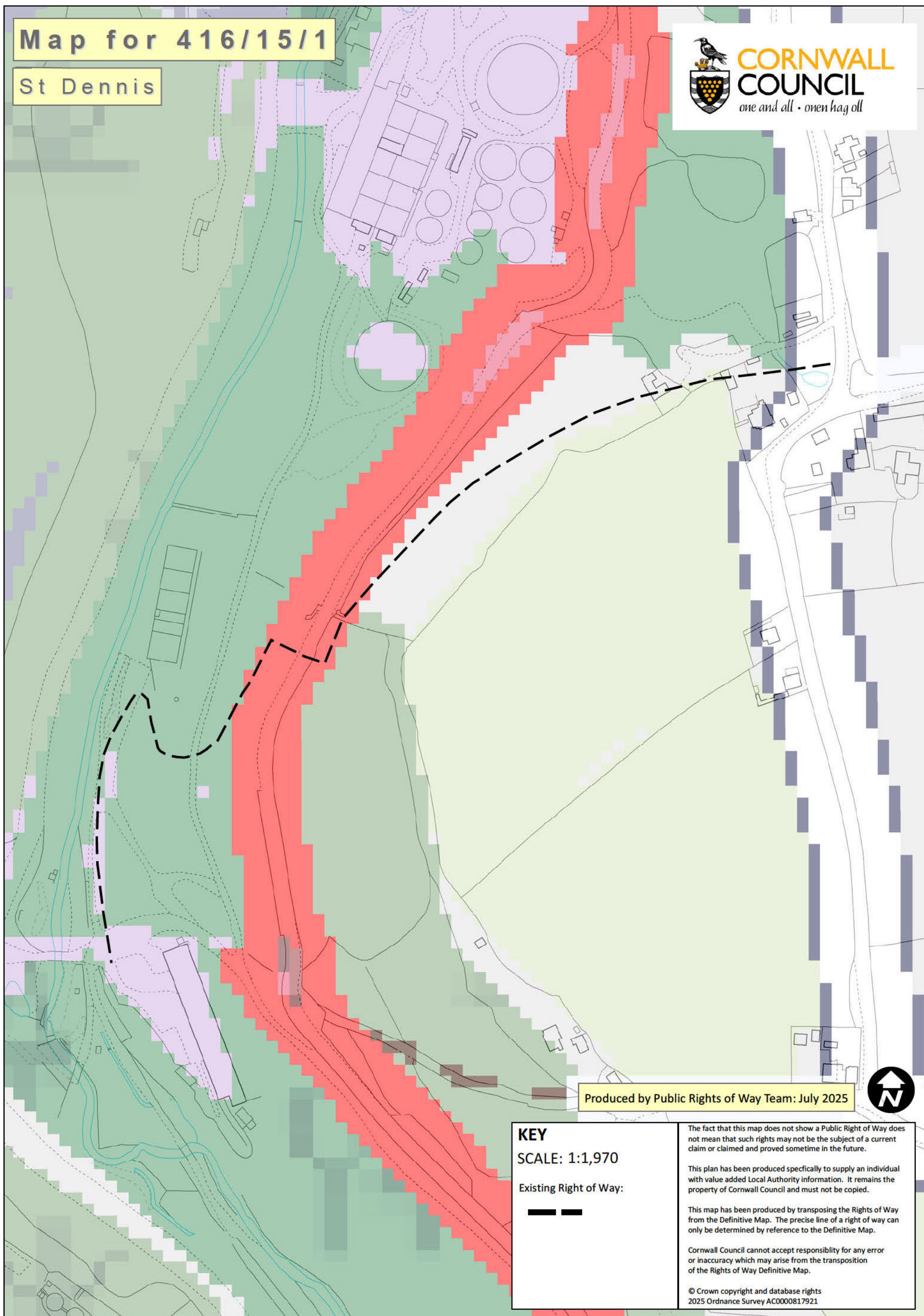
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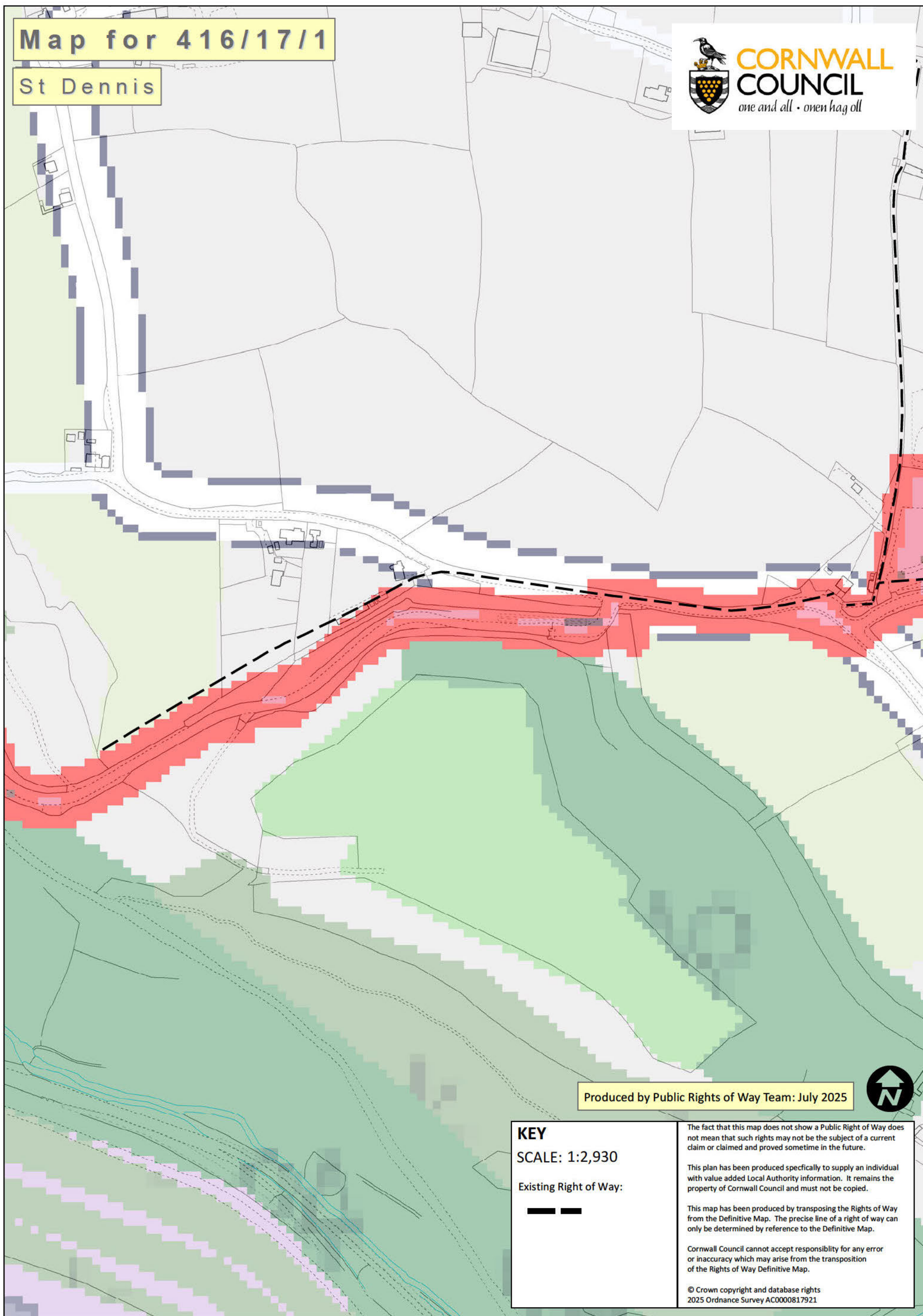
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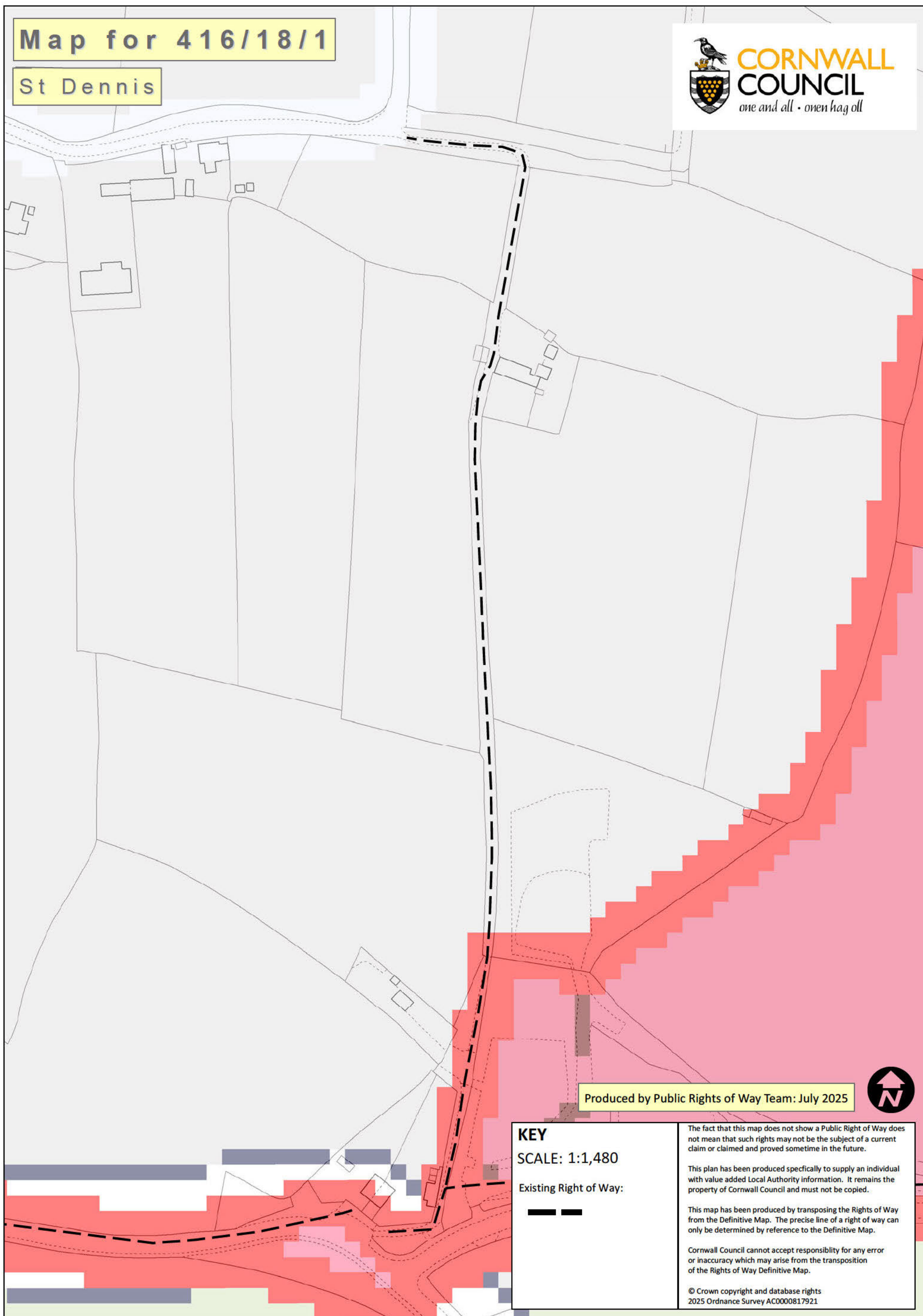
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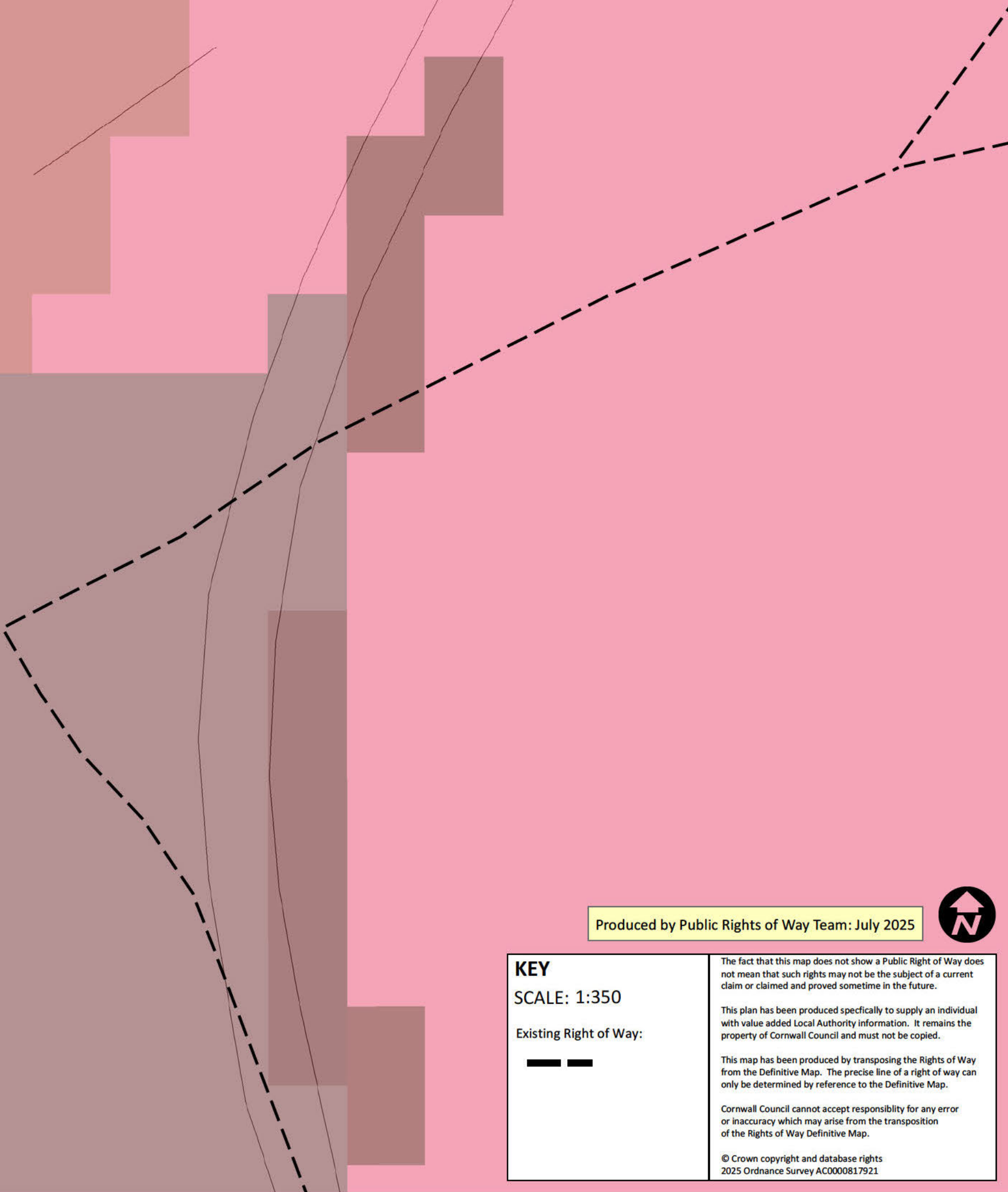
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Map for 422/14/1

St Stephen-in-Brannel



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Produced by Public Rights of Way Team: July 2025



KEY

SCALE: 1:350

Existing Right of Way:



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Map for 422/14/2

St Stephen-in-Brannel



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KEY

SCALE: 1:370

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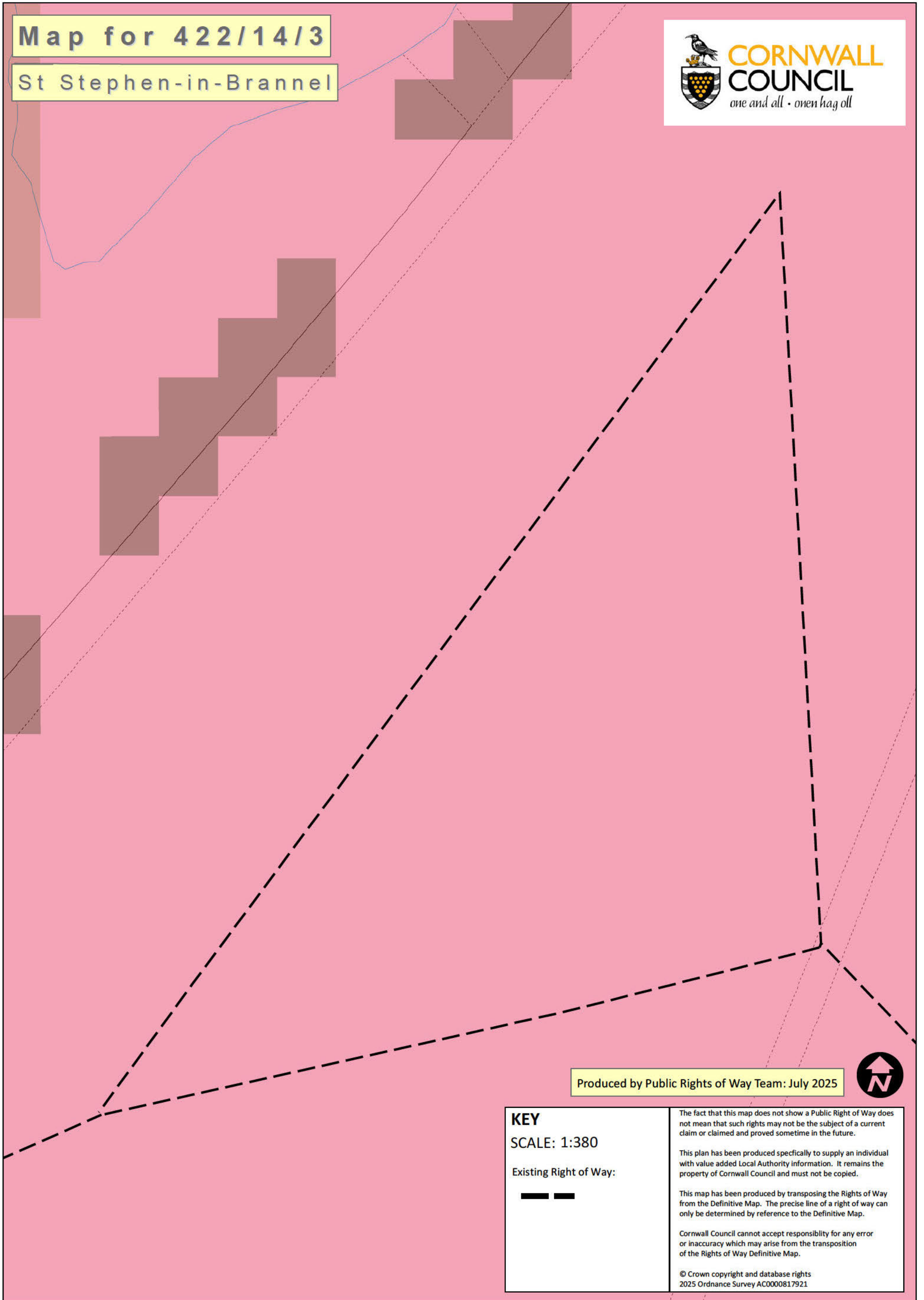
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Map for 422/14/3

St Stephen-in-Brannel



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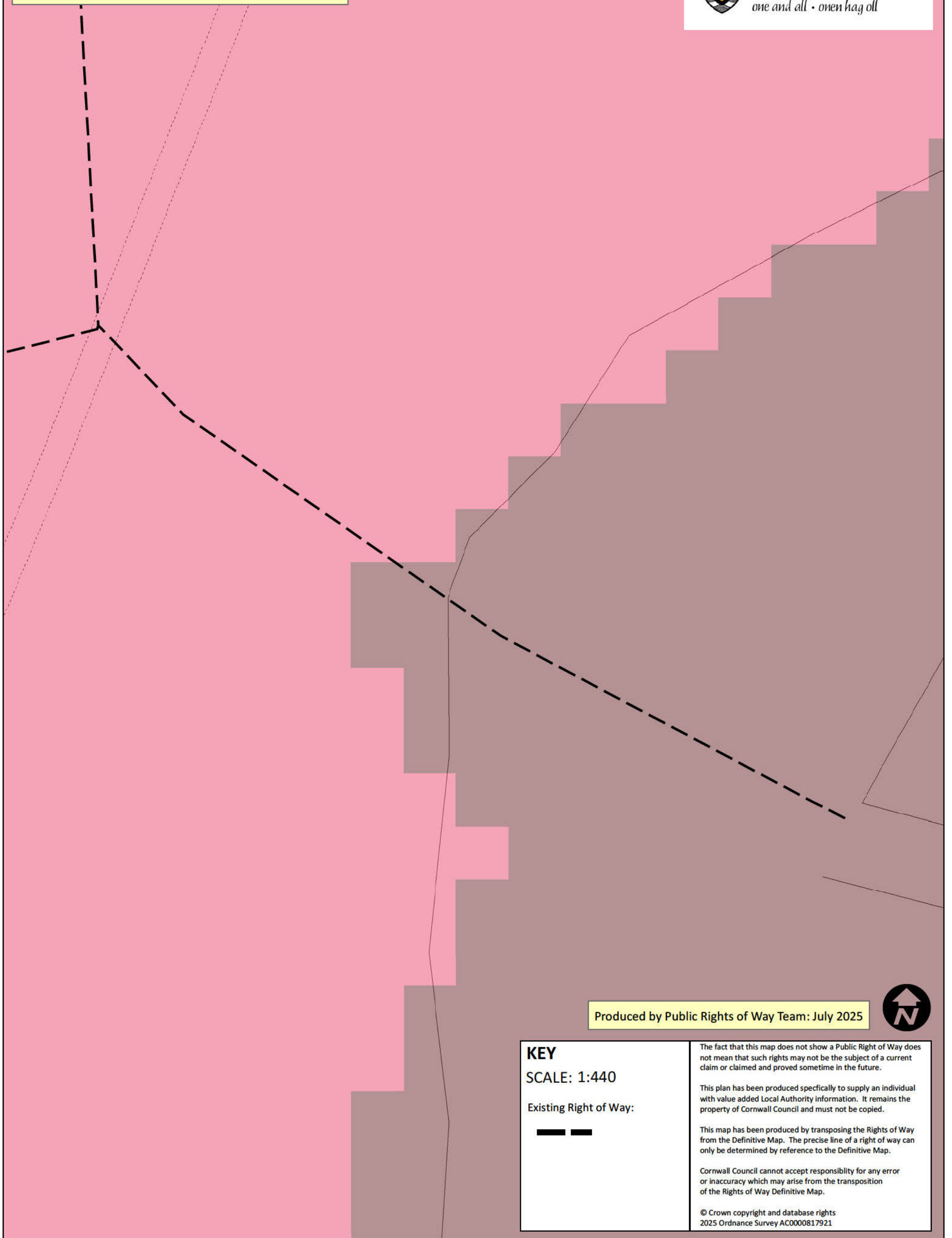
KEY SCALE: 1:380 Existing Right of Way: — —	<p>The fact that this map does not show a Public Right of Way does not mean that such rights may not be the subject of a current claim or claimed and proved sometime in the future.</p> <p>This plan has been produced specifically to supply an individual with value added Local Authority information. It remains the property of Cornwall Council and must not be copied.</p> <p>This map has been produced by transposing the Rights of Way from the Definitive Map. The precise line of a right of way can only be determined by reference to the Definitive Map.</p> <p>Cornwall Council cannot accept responsibility for any error or inaccuracy which may arise from the transposition of the Rights of Way Definitive Map.</p> <p>© Crown copyright and database rights 2025 Ordnance Survey AC0000817921</p>
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Map for 422/15/1

St Stephen-in-Brannel



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KEY

SCALE: 1:440

Existing Right of Way:



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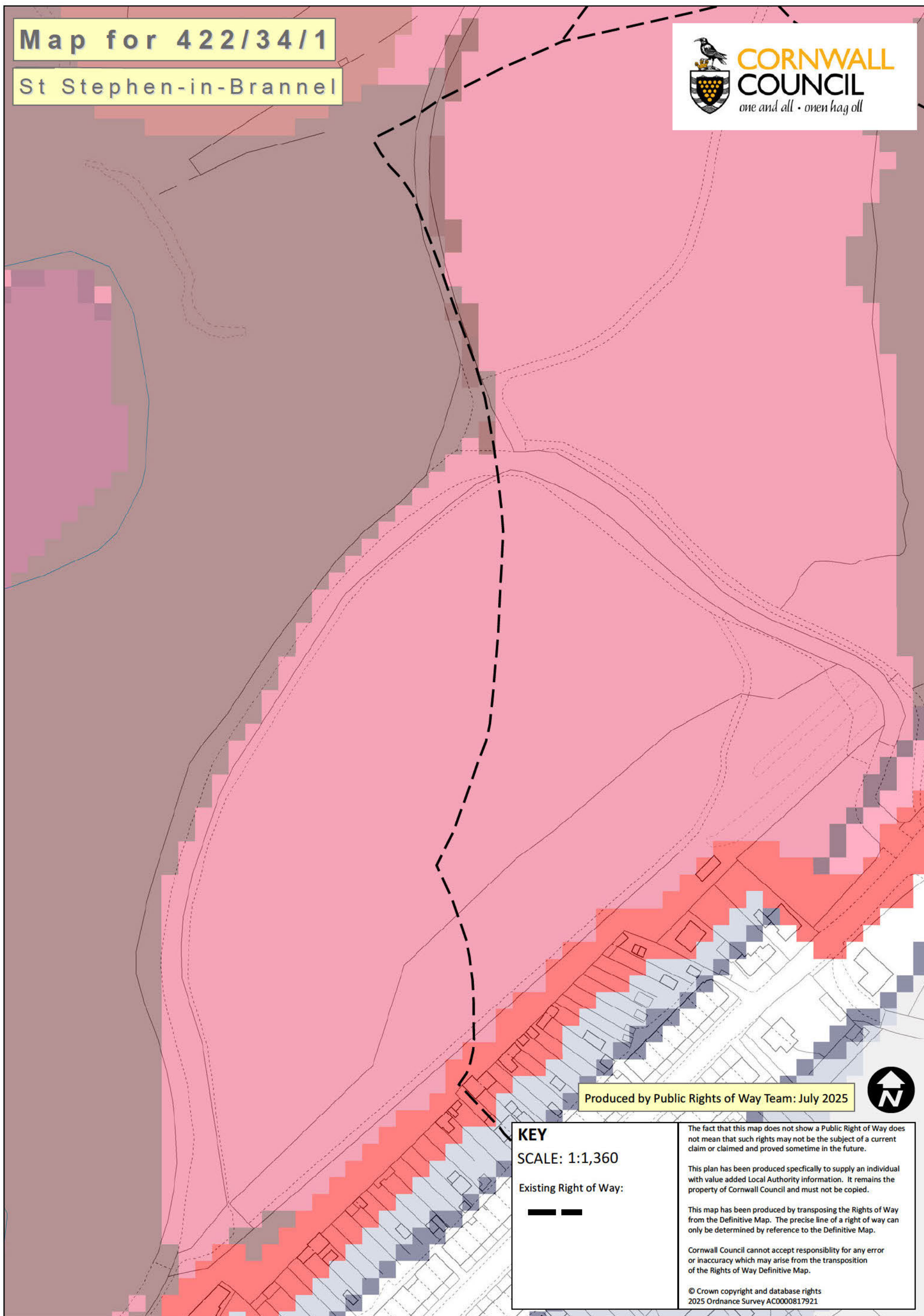
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Map for 422/34/1

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KEY

SCALE: 1:1,360

Existing Right of Way:



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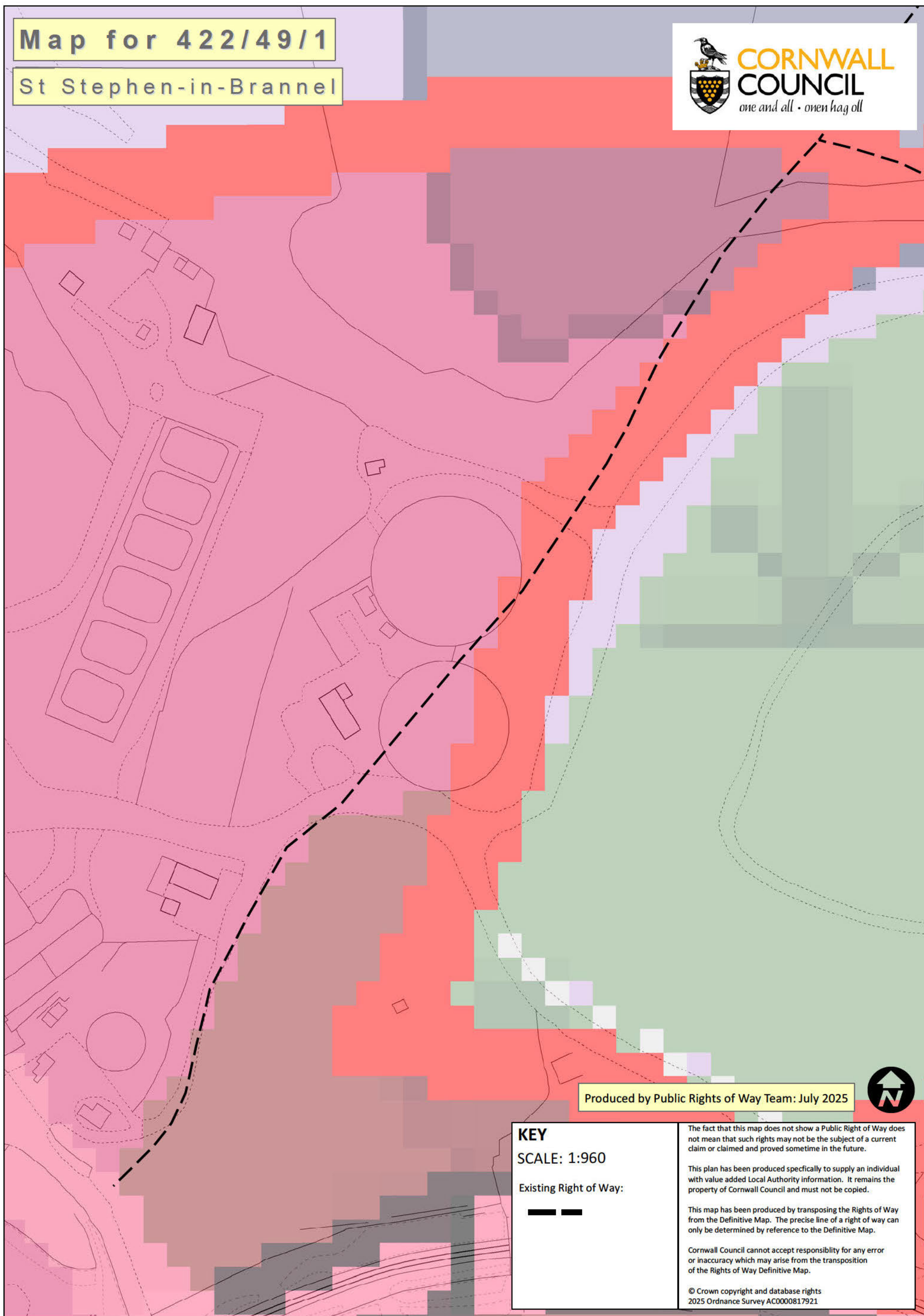
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Map for 422/49/1

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KEY

SCALE: 1:960

Existing Right of Way:



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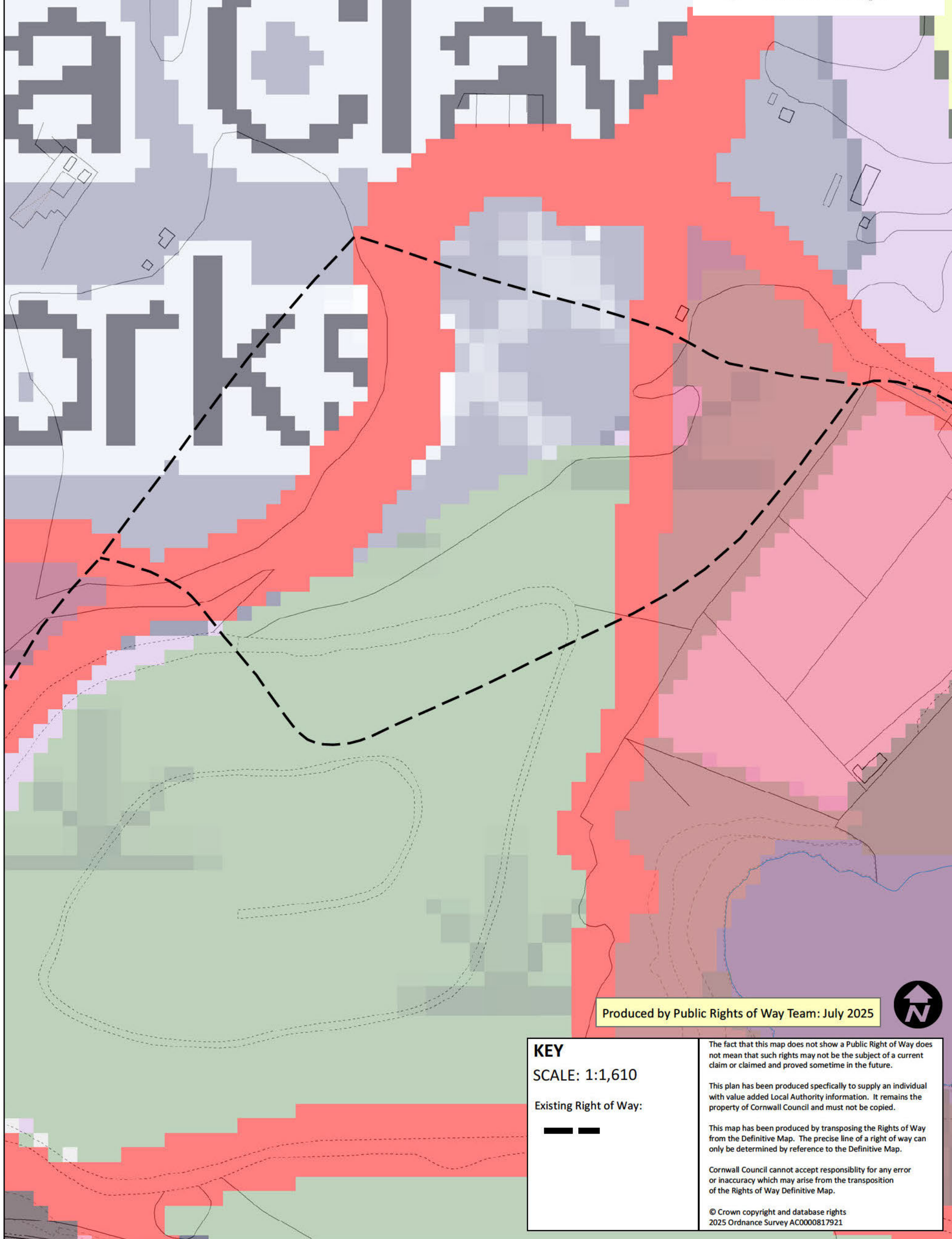
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Map for 422/51/1

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KEY

SCALE: 1:1,610

Existing Right of Way:



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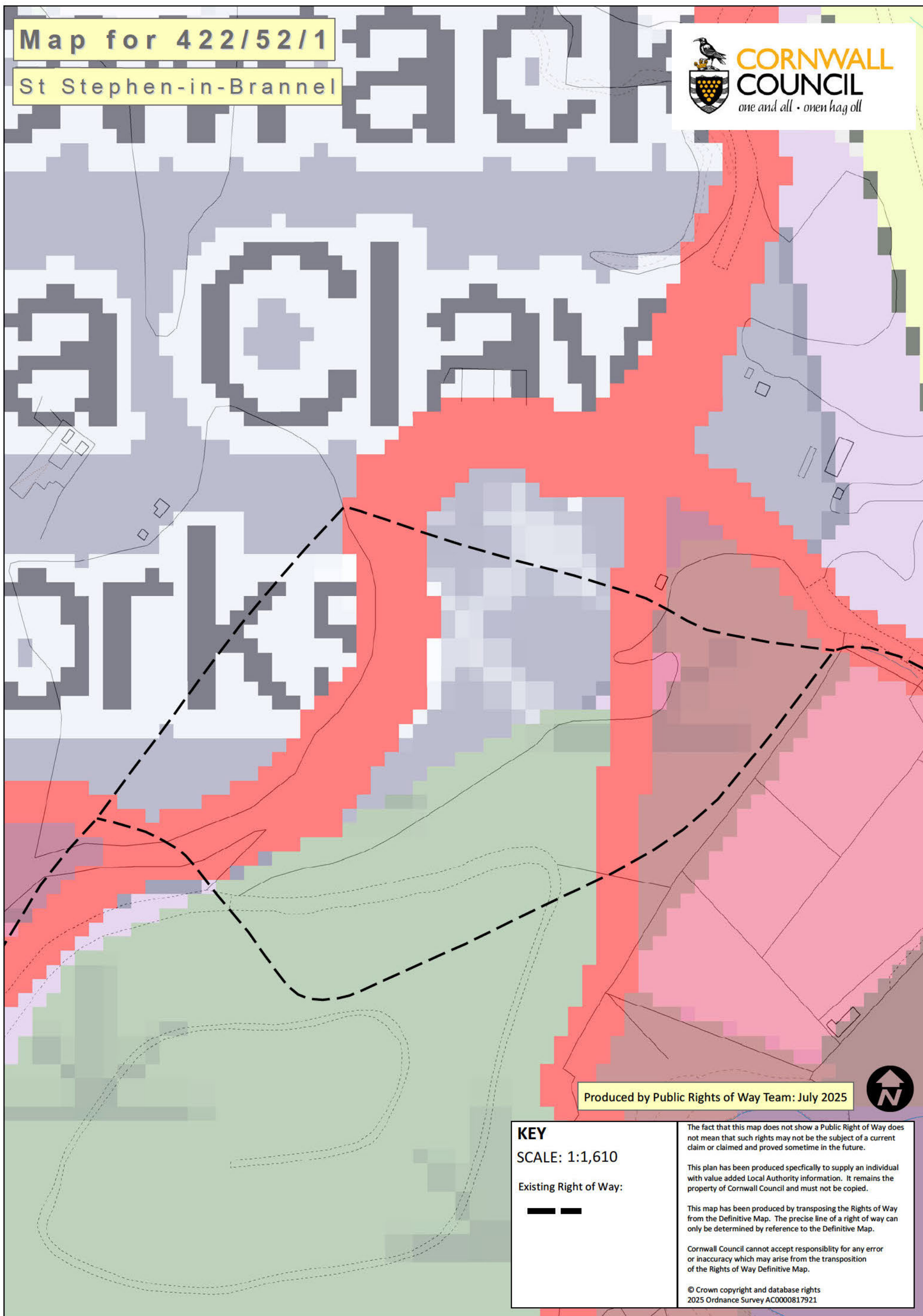
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Map for 422/52/1

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KEY

SCALE: 1:1,610

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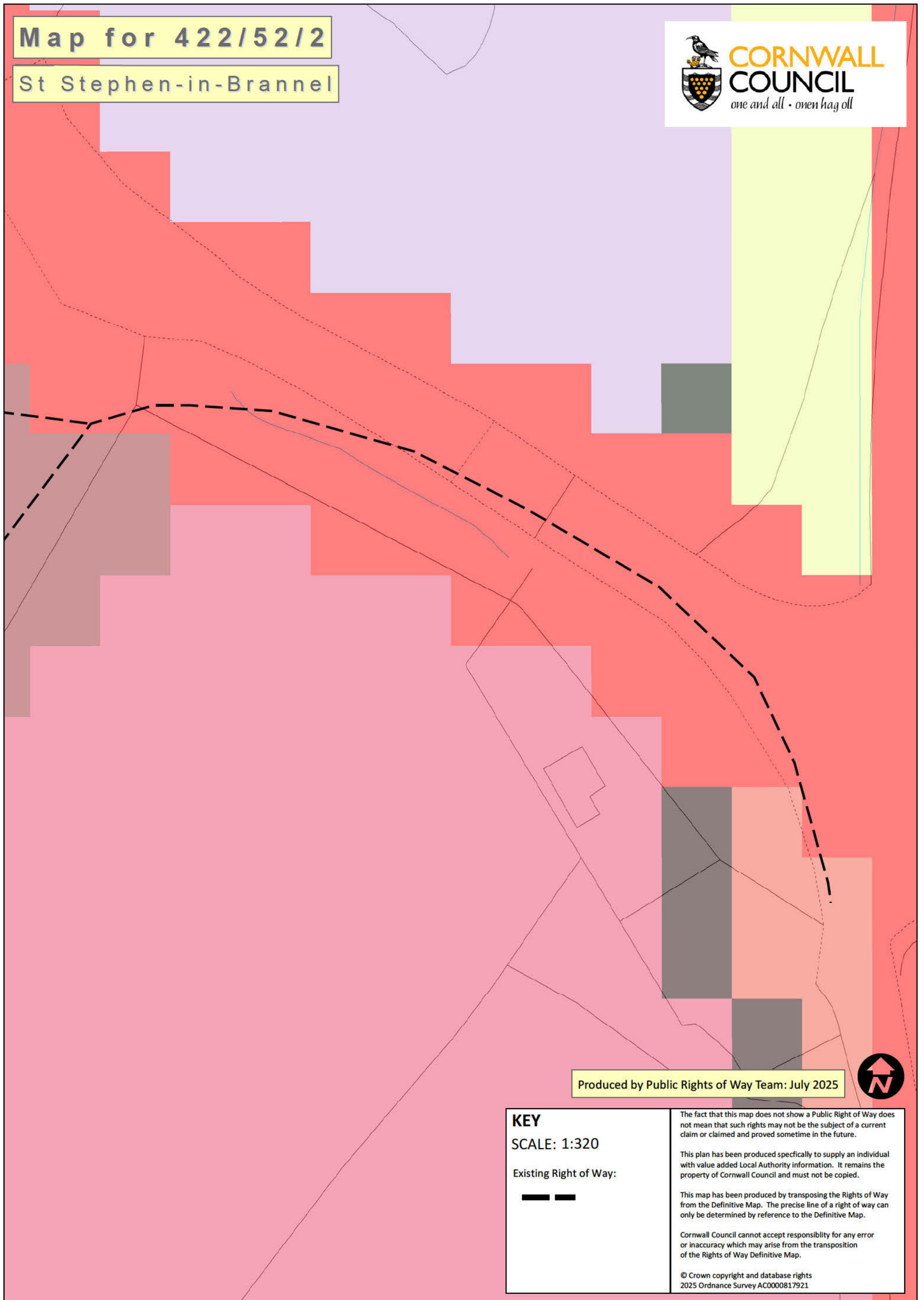
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Map for 422/52/2

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Produced by Public Rights of Way Team: July 2025

KEY

SCALE: 1:320

Existing Right of Way:



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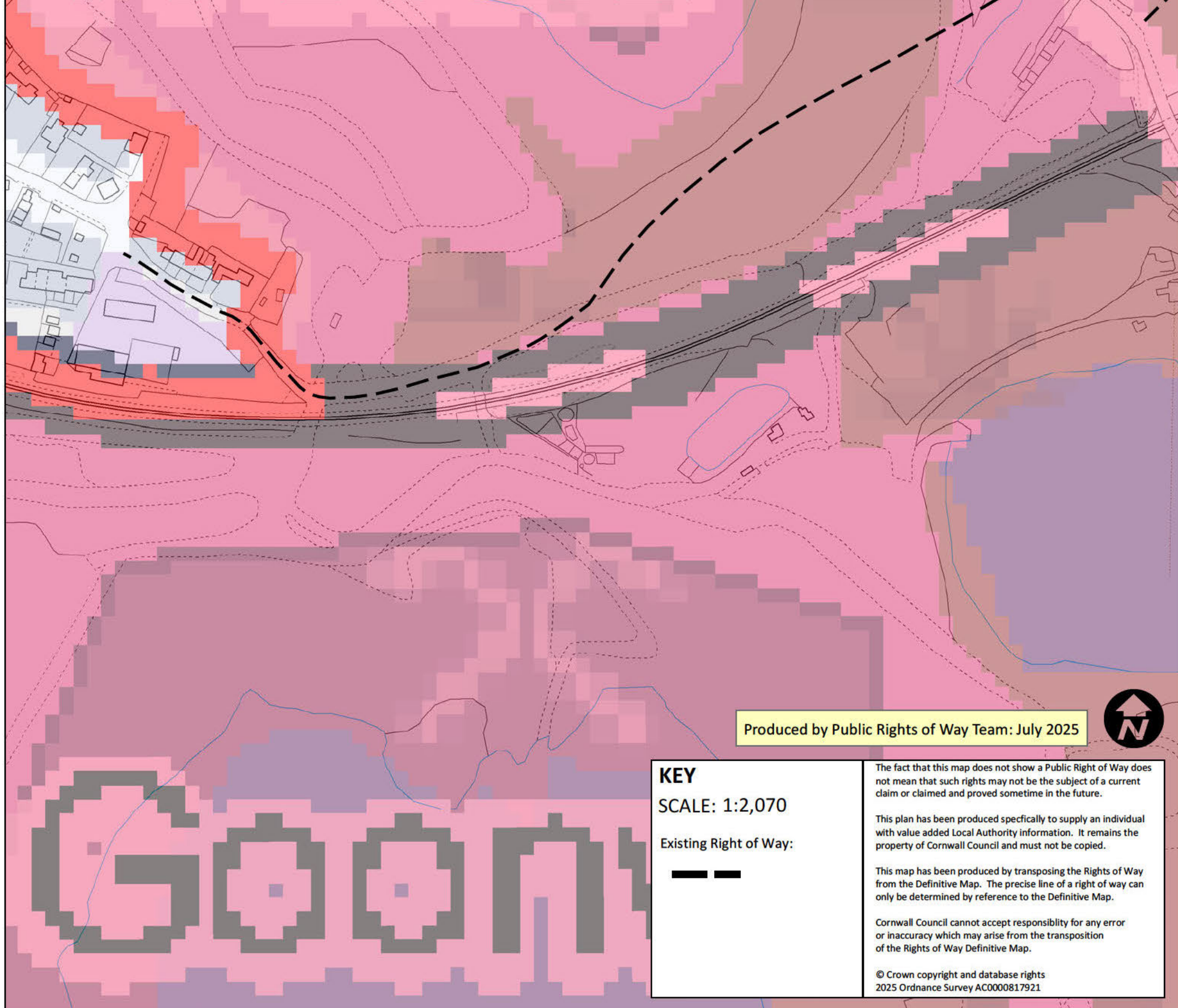
Map for 422/69/1

St Stephen-in-Brannel



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St Stephen-in-Brannel Clay Works



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KEY

SCALE: 1:2,070

Existing Right of Way:



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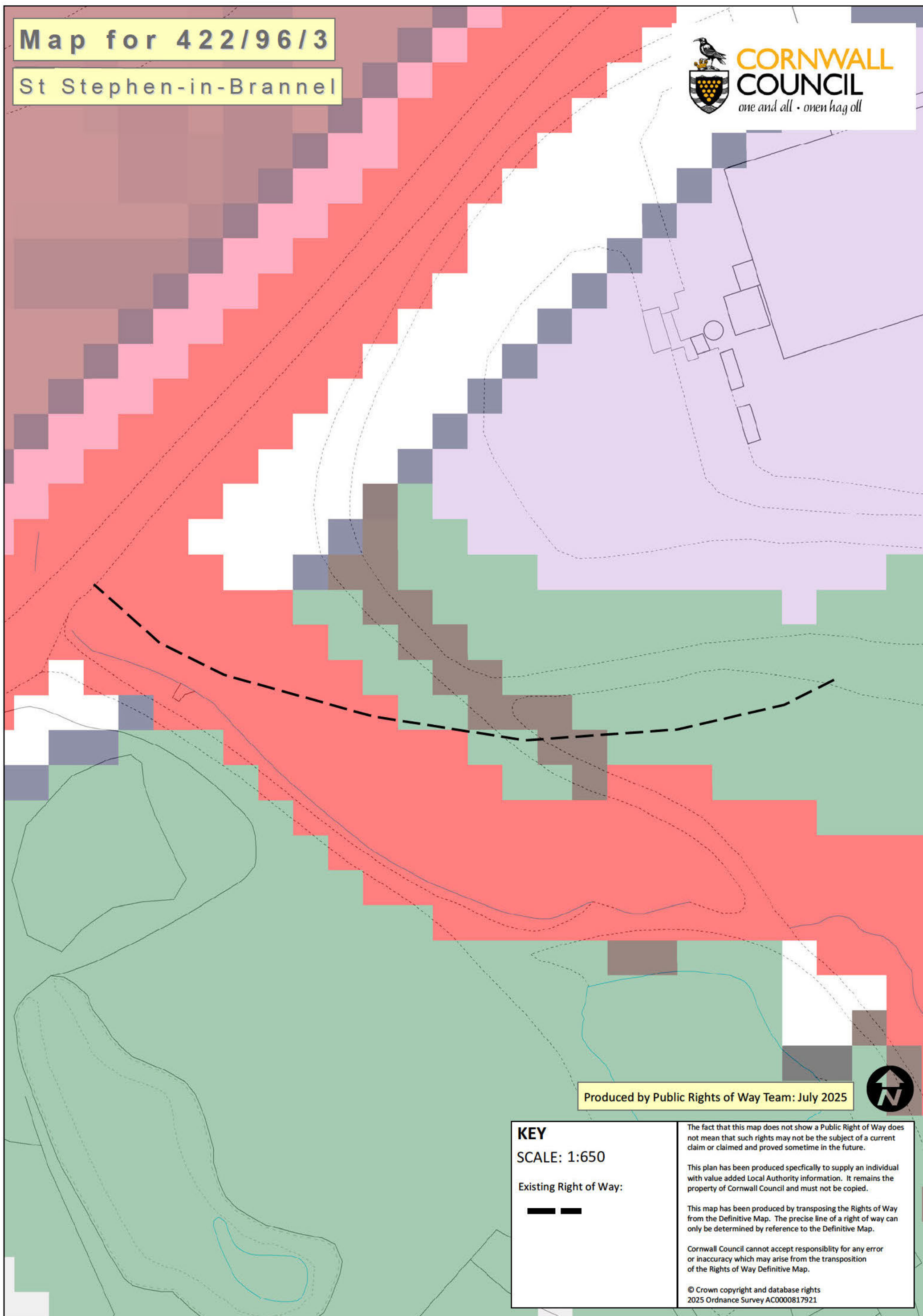
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Map for 422/96/3

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KEY

SCALE: 1:650

Existing Right of Way:



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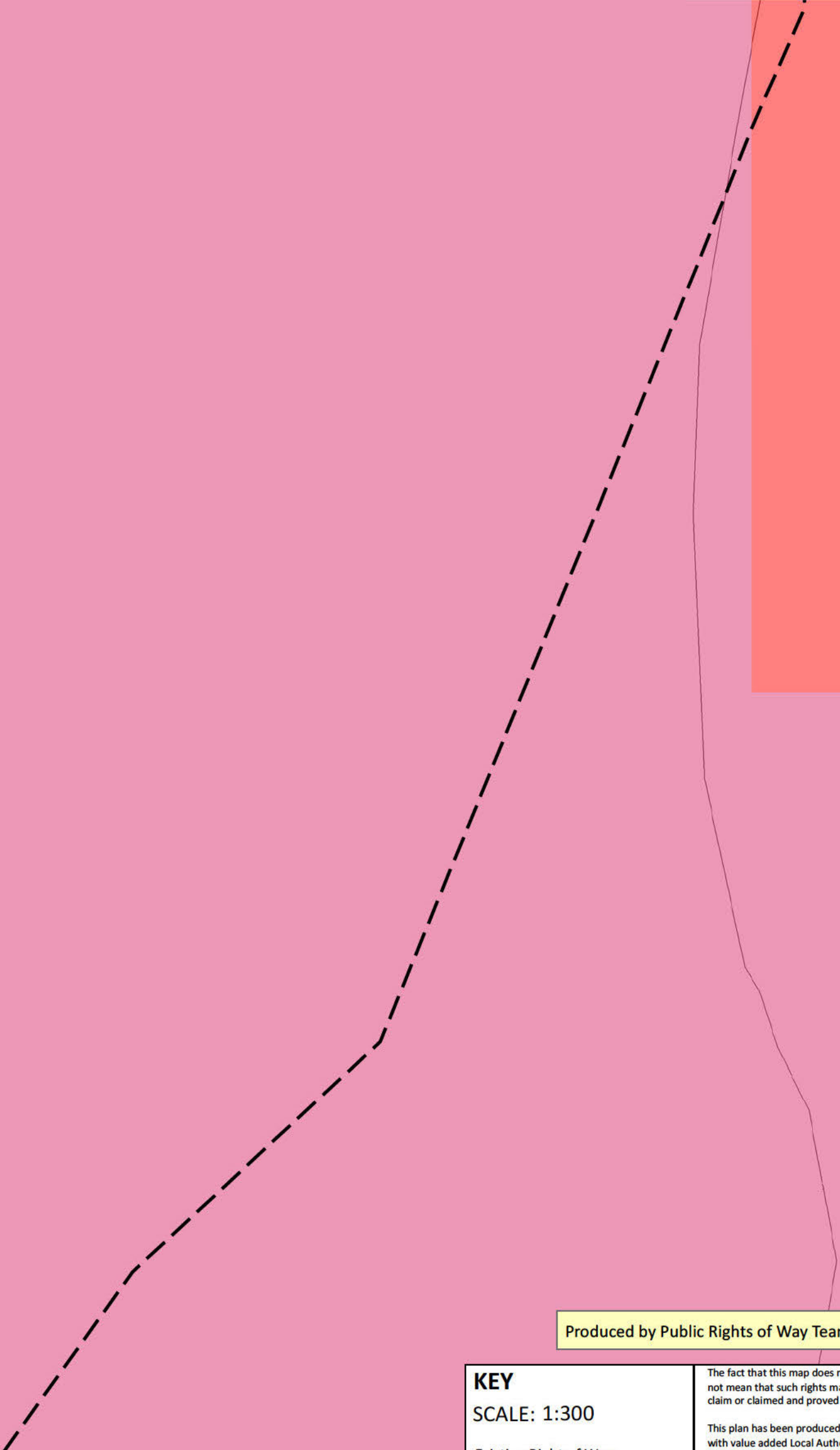
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Map for 422/98/1

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KEY

SCALE: 1:300

Existing Right of Way:



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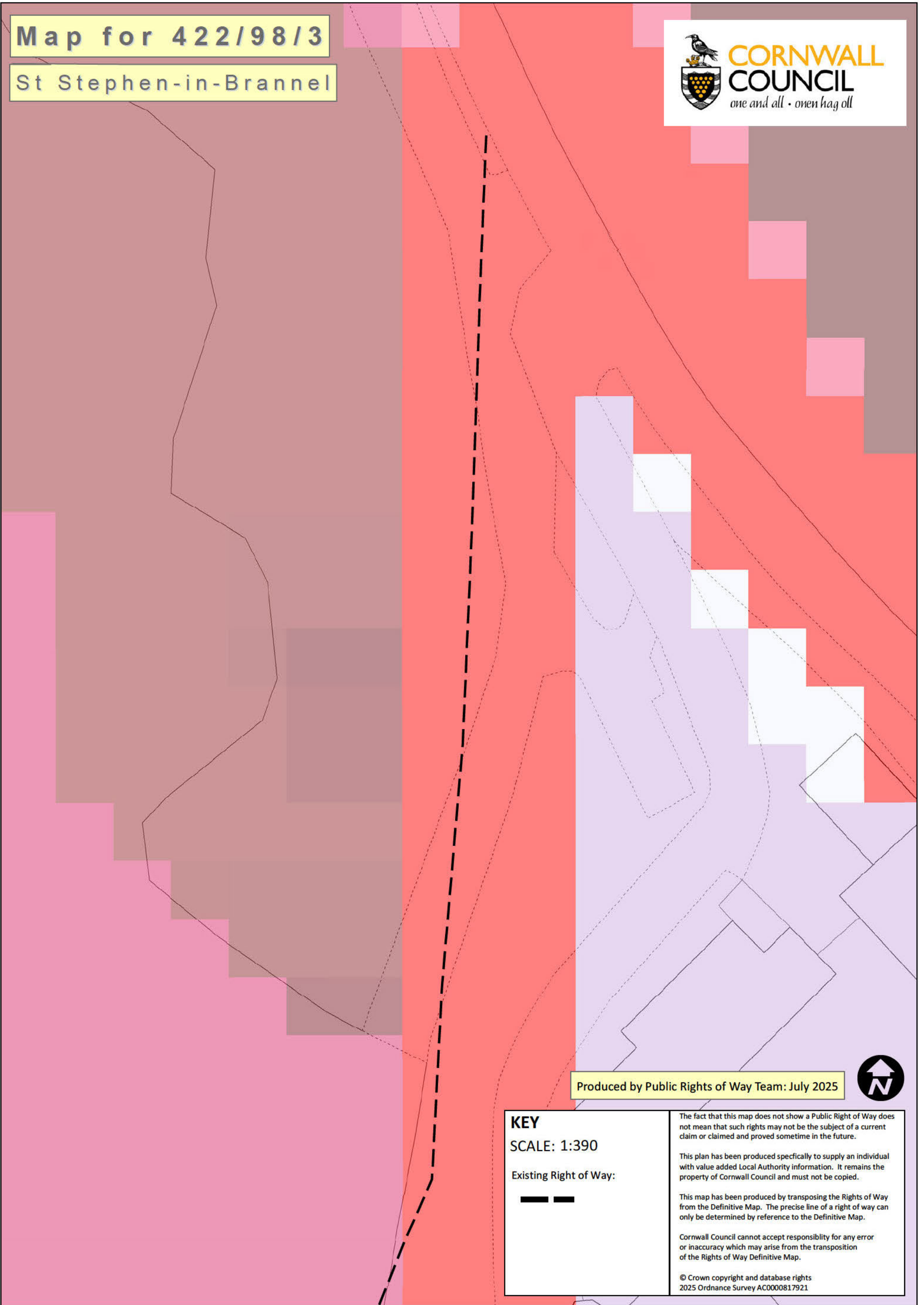
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Map for 422/98/3

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KEY

SCALE: 1:390

Existing Right of Way:



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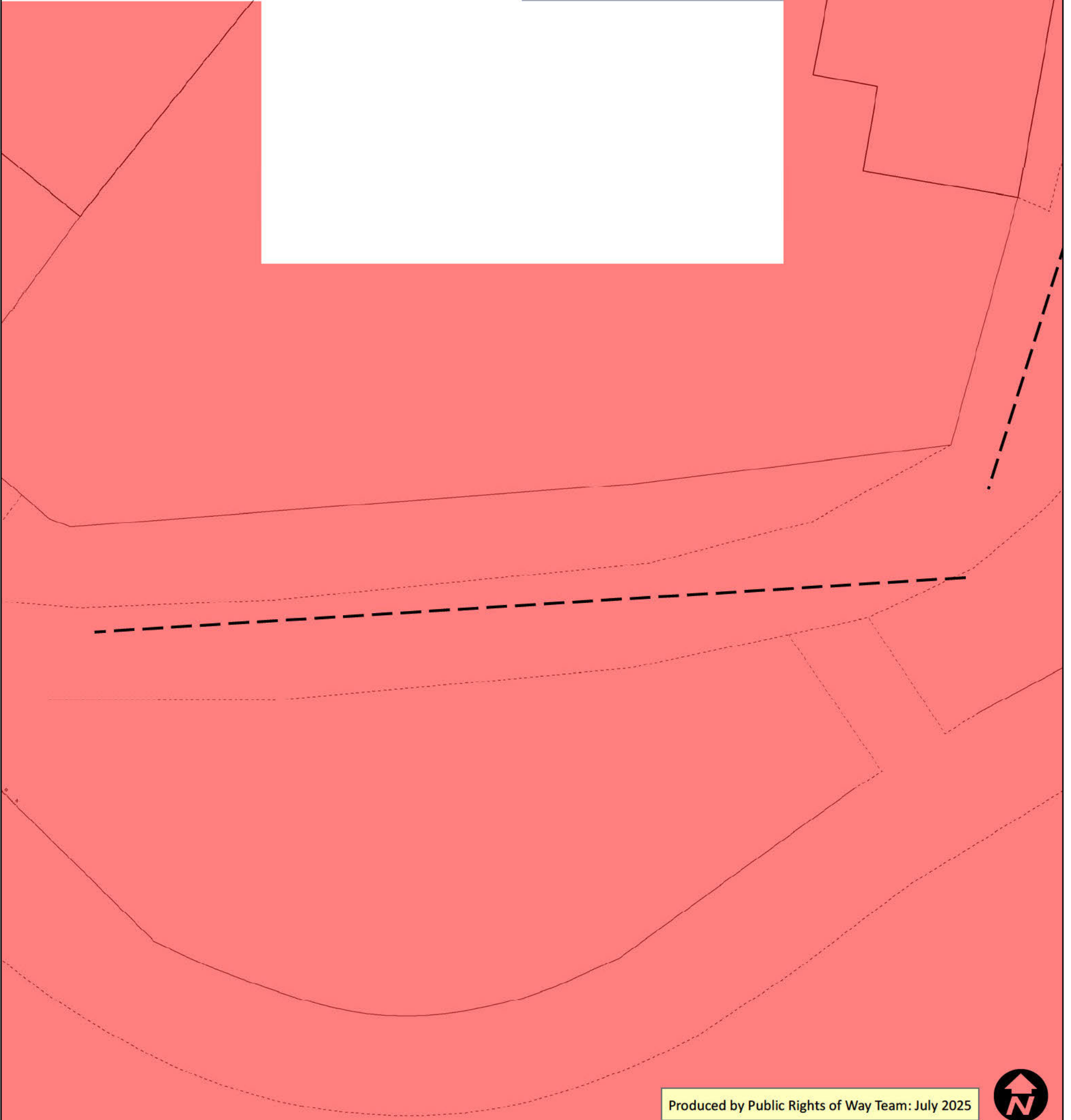
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Map for 422/108/1

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Produced by Public Rights of Way Team: July 2025



KEY

SCALE: 1:100

Existing Right of Way:



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From: [REDACTED]
To: [Trelavour Lithium](#)
Subject: RE: BC0310001 - The Trelavour Lithium Project - EIA Scoping and Consultation and Regulation 11 Notification
Date: 10 July 2025 10:41:52
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

You don't often get email from [REDACTED]@devon.gov.uk. [Learn why this is important](#)

Dear Laura

Devon County Council has no comments to make on the above consultation.

Thanks,

[REDACTED]

[REDACTED]
Principal Planning Officer
Climate Change, Environment and Transport
Devon County Council
Room 120, County Hall, Exeter, EX2 4QD

Tel: [REDACTED]
Email: [REDACTED]@devon.gov.uk

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From: Trelavour Lithium <trelavourlithium@planninginspectorate.gov.uk>

Sent: 24 June 2025 10:55

Subject: BC0310001 - The Trelavour Lithium Project - EIA Scoping and Consultation and Regulation 11 Notification

FAO HEAD OF PLANNING

Dear Sir/ Madam

Please see attached correspondence on the proposed Trelavour Lithium Project.

The applicant for the proposed development intends to make an application for development consent under the Planning Act 2008. The applicant has sought a scoping opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the environmental statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the scoping opinion and is inviting you to submit comments by **22 July 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Laura



Laura Feekins-Bate
Senior EIA Advisor
Planning Inspectorate
T [REDACTED]



@PINSgov



Planning Inspectorate



planninginspectorate.gov.uk

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DPC:76616c646f72



For the attention of: Laura Feekins-Bate
Senior EIA Advisor
Operations Group 3
Temple Quay House, Temple Quay
Bristol
BS1 6PN

Chemicals, Explosives and
Microbiological Hazards
Division – Unit 4

NSIP Consultations
Land Use Planning Team
Building 1.2,
Redgrave Court,
Bootle L20 7HS

Date: 7th July 2025

NSIP.applications@hse.gov.uk

References: CM9 Ref: 4.2.1.7371.
NSIP Ref: BC0310001

<http://www.hse.gov.uk/>

Dear Laura

PROPOSED TRELAVOUR LITHIUM PROJECT
PROPOSAL BY CORNISH LITHIUM G5 LTD
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017
(as amended) REGULATIONS 10 and 11

Thank you for your letter of **24th June 2025** regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's Land Use Planning Advice

Will the proposed development fall within any of HSE's consultation distances?

CEMHD5 Contribution to Consultation

1. With reference to Figure 1 Site Layout Plan found in [<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/BC0310001/documents>. Cornish Lithium G5 Limited, The Trelavour Lithium Project, PINS Ref: BC0310001, Environmental Impact Assessment (EIA) Scoping Report, June 2025, Version 1. Appendix A Figures] on which is shown a red-lined *Scoping Boundary*, there are area(s) of the proposed development that fall within HSE public safety consultation zones associated with Major Accident Hazard Pipeline(s):
 - a. Liskeard / Indian Queens (Ref:LQ) [HSE ref: 7249, Transco ref: 1517] - Wales and West Utilities
2. Furthermore, an area of the red-lined *Scoping Boundary* currently falls within the consultation distances of Major Accident Hazard Installation(s):

- a. **Indian Queens Power Ltd, Gaverigan, St Dennis, St Austell, Cornwall, PL26 8BY**
[HSE ref: H4370]

3. **There is currently insufficient information available for HSE to provide its' public safety Land Use Planning Advice. However, by way of general guidance HSE would not advise against the proposed development providing no population(s), either temporary or permanent, is introduced within any of HSE's public safety zones nor would HSE advise against Workplaces (DT1.1 - Workplaces)*, providing for less than 100 occupants in each building and less than 3 occupied storeys.**

*** HSE's Land Use Planning Methodology Table 1 Development type: People at work, Parking**
[<https://www.hse.gov.uk/landuseplanning/methodology.htm>]

4. **Please note if at any time a new Major Accident Hazard Pipeline is introduced or existing Pipeline modified prior to the determination of a future application, the HSE reserves the right to revise its advice.**
5. **Likewise, if prior to the determination of a future application, a Hazardous Substances Consent is granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed project, again the HSE reserves the right to revise its advice.**

Would Hazardous Substances Consent be needed?

6. **The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015.**
7. **Hazardous Substances Consent would be required if the proposed development site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.**
8. **Further information on HSC should be sought from the relevant Hazardous Substances Authority.**

Explosives sites

CEMHD 7's response is:

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

Electrical safety

No comment from a planning perspective

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours faithfully,

**CEMHD4
NSIP Consultation Team**

The Planning Inspectorate
3D, Temple Quay House
Temple Quay
Bristol
BS1 6PN

Our ref: PL00799217

Your ref: BC0310001

Telephone: 0117 9750699

Date: 21 July 2025

Dear Planning Inspectorate

RE: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations)

The Trelavour Lithium Project - Historic England Advice on applicant's Scoping Report, Reference BC0310001-000004

Thank you for consulting Historic England in respect of this request for a scoping opinion. We are broadly content with the proposed assessment methodology set out by the applicant in their EIA Scoping Report, but have the following comments to make in respect of designated heritage assets and undesignated heritage assets which may be of equivalent significance to designated heritage assets:

Potential impact upon setting of heritage assets – the proposed 3km assessment radius

– we note that the applicant has committed to not making the 3km boundary a definitive cut off point for setting assessment and welcome this commitment. The indicative Zone of Theoretical Visibility (ZTV) will identify those designated heritage assets that may be affected at a wider radius than 3km and we are content with this approach. However, without prejudice to any other designated assets that may be affected, we wish to draw attention to the clear views towards the Trelavour sky tips that may be experienced from Scheduled Monument No. 1006713 *Large multivallate hillfort with two bowl barrows known as Castle-an-Dinas, 335m north of Tresaddern Bungalow*. While the view of the sky tips from Castle an Dinas will not

contribute towards the significance of this later prehistoric monument, there is nonetheless a cultural richness in this view. Castle an Dinas holds great significance for the 'story' of Cornwall through its heritage values, while China clay sky tips, once numerous in mid Cornwall, are now relatively few in number. Those remaining examples in their own way contribute to the industrial 'story' of Cornwall and Cornish distinctiveness. In highlighting this visual relationship I seek to emphasise the need for any setting assessment to take a holistic approach to assessing the effects of the scheme on mid Cornwall's cultural heritage, particularly in the narrative discussion of effects.

Undesignated heritage sites of potential national significance - There are historic sites and assets of potential national importance that are within the scoping area and are currently undesignated. These sites have been identified through the Historic England Monuments Protection Programme (MPP) Clay Industry Report (2000). I enclose with this letter copies of maps which show these assets.

It is expected that there will be overlap with those sites that are included in the Cornwall Historic Environment Record and which have been included in the scoping report. Consideration should be given as to whether these sites and assets meet the criteria of statutory designation through either the regimes of listing or scheduling. The treatment of these assets within the assessment of effects should commensurate with their assessed significance. Historic England would be pleased to advise further on this matter.

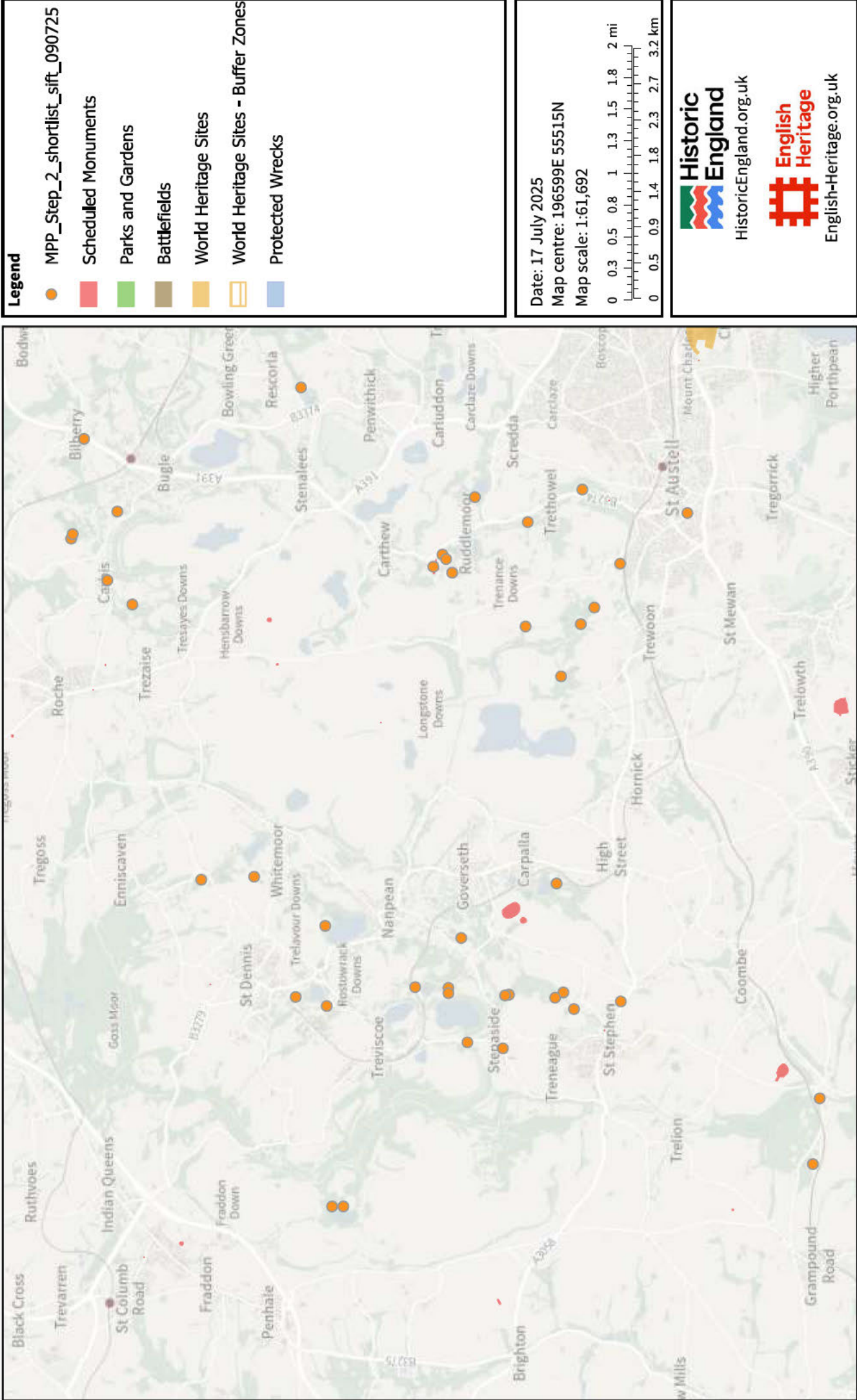
Yours sincerely



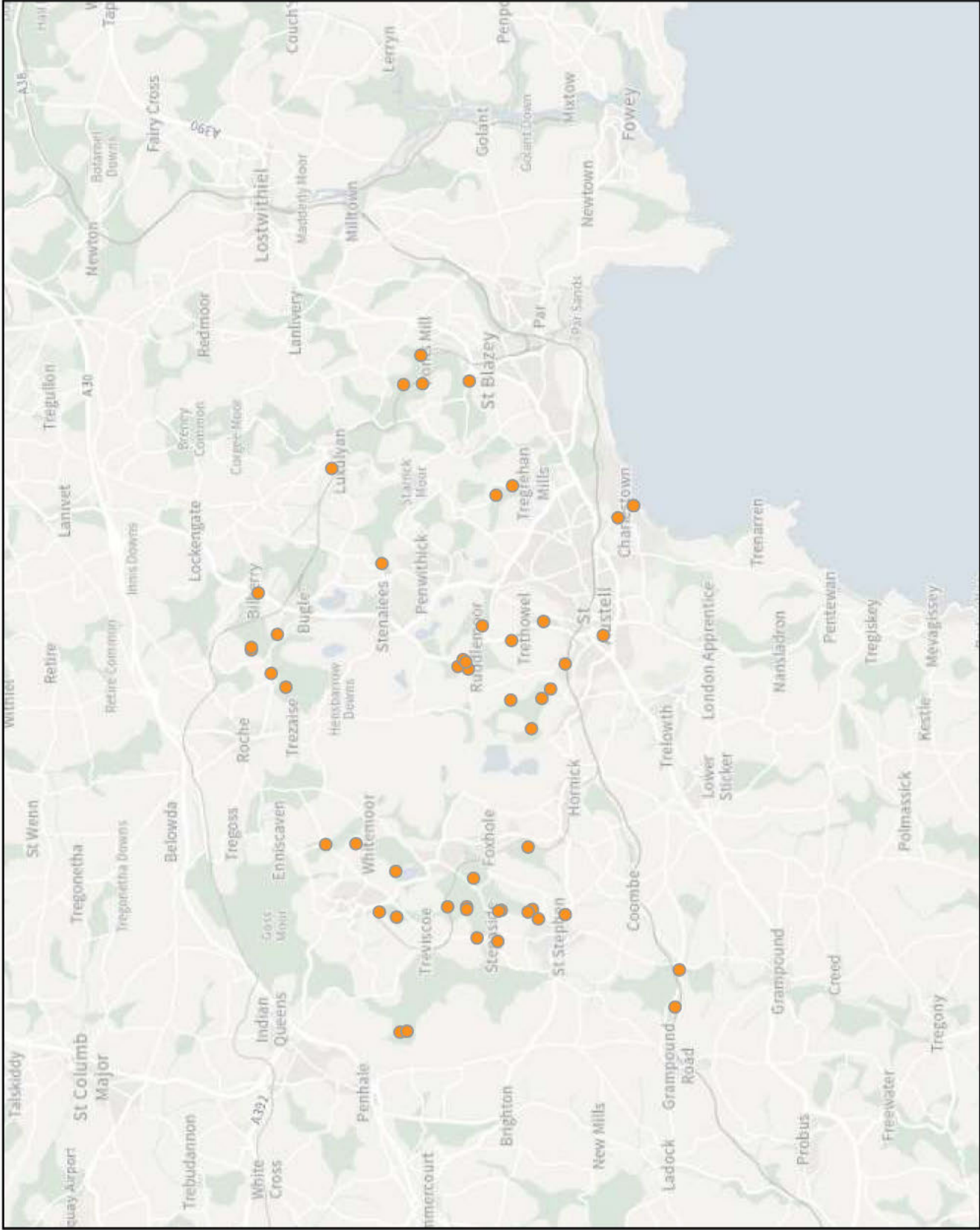
Inspector of Ancient Monuments – Devon and Cornwall

Regions Group

China clay_scoping area



China clay



Legend

- MPP_Step_2_shortlist_sift_090725

Date: 17 July 2025

Map centre: 201487E 54727N

Map scale: 1:123,383

0 0.6 1.1 1.7 2.2 2.8 3.3 3.8 mi

0 0.9 1.8 2.7 3.6 4.5 5.4 6.3 km



HistoricEngland.org.uk



English-Heritage.org.uk

From: [Completions](#)
To: [Trelavour Lithium](#)
Subject: RE: BC0310001 - The Trelavour Lithium Project - EIA Scoping and Consultation and Regulation 11 Notification
Date: 07 July 2025 11:55:22
Attachments: [image001.png](#)
[image002.jpg](#)
[image003.png](#)
[image004.png](#)
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[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image683088.png](#)
[image492618.png](#)
[image797339.png](#)
[image893569.png](#)

Good Morning Laura,

Thank you for providing the below, I can confirm we have no utilities in this area.

Should any further information or assistance be required, please don't hesitate to ask.

Kind Regards,



Completions
Indigo Networks

 completion@indigonetworks.co.uk



**200 Brook Drive, Green Park,
Reading, RG2 6UB.**

 www.indigonetworks.co.uk

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From: Trelavour Lithium <trelavourlithium@planninginspectorate.gov.uk>
Sent: 04 July 2025 12:31
To: Completions <completion@indigonetworks.co.uk>
Subject: RE: BC0310001 - The Trelavour Lithium Project - EIA Scoping and Consultation and Regulation 11 Notification

You don't often get email from trelavourlithium@planninginspectorate.gov.uk. [Learn why this is important](#)

Dear [REDACTED]

The applicant has provided the below information in response to your query.

Due to the nature of the site boundary there is not a specific address, but hopefully these are sufficient:

Address - Land at Trelavour Downs, St Dennis, Cornwall

Nearest postcode - PL26 8DJ

Grid reference - 195915, 057038 (this is the centre of the mine site)

Kind regards

Laura

From: Completions <completion@indigonetworks.co.uk>

Sent: 03 July 2025 10:17

To: TrelavourLithiumProject@cornishlithium.com

Cc: Trelavour Lithium <trelavourlithium@planninginspectorate.gov.uk>

Subject: RE: BC0310001 - The Trelavour Lithium Project - EIA Scoping and Consultation and Regulation 11 Notification

You don't often get email from completion@indigonetworks.co.uk. [Learn why this is important](#)

Good Morning,

I received the below and attached.

Could you please provide me with the Full Address and Postcode as well as Coordinates if you have them and I'll see if we have network in that location.

Kind Regards,

[REDACTED]

Completions
Indigo Networks

 completion@indigonetworks.co.uk



**200 Brook Drive, Green Park,
Reading, RG2 6UB.**

 www.indigonetworks.co.uk

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From: Trelavour Lithium <trelavourlithium@planninginspectorate.gov.uk>

Sent: 24 June 2025 10:52

Subject: BC0310001 - The Trelavour Lithium Project - EIA Scoping and Consultation and Regulation 11 Notification

You don't often get email from trelavourlithium@planninginspectorate.gov.uk. [Learn why this is important](#)

Dear Sir/ Madam

Please see attached correspondence on the proposed Trelavour Lithium Project.

The applicant for the proposed development intends to make an application for development consent under the Planning Act 2008. The applicant has sought a scoping opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the environmental statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the scoping opinion and is inviting you to submit comments by **22 July 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Laura



Laura Feekins-Bate
Senior EIA Advisor
Planning Inspectorate
T [REDACTED]



@PINSgov



Planning Inspectorate



planninginspectorate.gov.uk

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DPC:76616c646f72



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██████████
Lead Development Liaison Officer
Land, Planning and External Affairs

██████████ [@nationalgrid.com](mailto:██████████@nationalgrid.com)
██████████

www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
Trelavourlithium@planninginspectorate.gov.uk

22 July 2025

Dear Sir/Madam

APPLICATION BY CORNISH LITHIUM G5 LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE TRELAVOUR LITHIUM PROJECT (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

I refer to your letter dated 24th June 2025 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure in close proximity to the current red line boundary.

NGET has high voltage electricity Substation and overhead transmission lines, within and in close proximity the scoping area. The Substation overhead lines forms an essential part of the electricity transmission network in England and Wales.

Existing Infrastructure

Substation

- INDIAN QUEENS 132 kV Substation
- INDIAN QUEENS 400 kV Substation
- Associated overhead and underground apparatus including cables

Overhead Lines

4VW 400 kV OHL	ALVERDISCOTT - INDIAN QUEENS - TAUNTON 1 ALVERDISCOTT - INDIAN QUEENS - TAUNTON 2
4YE 400 kV OHL	INDIAN QUEENS - LANDULPH 1 INDIAN QUEENS - LANDULPH 2

I enclose a plan showing the location of NGET's apparatus near the scoping area.

New infrastructure

Please refer to the Holistic Network Design (HND) and the National Grid ESO website to view the strategic vision for the UK's ever growing electricity transmission network. <https://www.nationalgrideso.com/future-energy/the-pathway-2030-holistic-network-design/hnd>

NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects>. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 5 (2019)”.
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings can be obtained using the contact details above.
- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.
- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

To download a copy of the HSE Guidance HS(G)47, please use the following link:
<http://www.hse.gov.uk/pubns/books/hsg47.htm>

Further Advice

We would request that the potential impact of the proposed scheme on NGET's existing and future assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, NGET is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by NGET. Further information relating to this can be obtained by contacting the email address below.

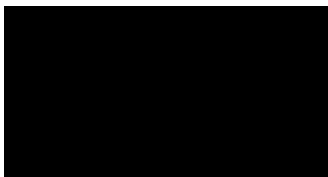
Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully



**Lead Development Liaison Officer
Customer Connections Site Solutions
Land, Planning and External Affairs**



Legend

Substations

- Substations
- Planned & Spares

Fibre Cable

- Fibre Cable
- Commissioned

Buried Cable

- Buried Cable
- Commissioned

Towers

- Towers
- Commissioned

OHL 400Kv

- OHL 400Kv
- Commissioned

Substations

- Substations
- Commissioned

Notes



From: [REDACTED]
To: [Trelavour Lithium](#)
Cc: [REDACTED] [Planning SW](#)
Subject: BC0310001: PINS - A30 Trelavour Lithium DCO Scoping
Date: 09 July 2025 15:39:04

You don't often get email from [REDACTED]@nationalhighways.co.uk. [Learn why this is important](#)

Dear Sir/Madam

National Highways and Environmental Impact Assessment Reports

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

BC0310001: Application by Cornish Lithium G5 Limited (the applicant) for an Order granting Development Consent for the Trelavour Lithium Project (the proposed development) - Scoping consultation

Thank you for inviting National Highways (previously operating as the Highways Agency and Highways England) to provide comments on the above request for a scoping opinion. As a Statutory Consultee we seek to act as a proactive partner and therefore welcome pre-application discussion. This includes the opportunity to provide advice on the scope of any Environmental Statement pursuant to the procedures set out in the Environmental Impact Assessment Regulations 2017, which also identifies us as a statutory party.

Whilst we have no view on whether the above development meets the requirements for an Environmental Statement, we offer comments on the assessment of traffic impacts that we would expect to accompany any submission, as well as potential operational asset impacts that will require consideration by the applicant. Our comments relate to matters arising from our responsibilities to manage and maintain the strategic road network (SRN) which in this case comprises the A30 trunk road. Comments relating to the local road network should be sought from the appropriate Local Highway Authority.

We understand that the proposed development will comprise lithium extraction and processing facilities with ancillary development and infrastructure works. In addition to lithium production, it is proposed that a proportion of the overburden is likely to be processed to produce secondary aggregate for the construction industry. It is noted that the existing Trelavour site has the benefit of extant permissions for the winning and working of china clay, sand and allied minerals with associated processing plant. It is expected that the proposed development would require a 2 year construction period, a predicted 20 year operational phase, and a further 2-3 years for decommissioning. National Highways will need to understand the impact of vehicle movements associated with the proposed development, both during the construction and operational phases of the development. We will also need to understand whether development traffic will be additional to, or will replace, movements associated with former/existing china clay operations. We would expect alternative methods to road transport to also be explored noting the rail and sea infrastructure in place to serve the china clay

workings.

We have therefore set out below both the general and specific areas of concern that National Highways would expect to see considered as part of any Environmental Statement submission.

General aspects to be addressed

- An assessment of transport related impacts of the proposal should be carried out and reported as described in current national planning practice guidance.
- Environmental impacts arising from any disruption during construction, traffic volume, composition or routing change and transport infrastructure modification should be fully assessed and reported, along with the environmental impact of the road network upon the development itself.
- Adverse changes to noise and air quality should be considered, including in relation to compliance with the European air quality Limit Values and/or Local Authority designated Air Quality Management Areas (AQMAs) and World Health Organisation (WHO) criteria.

Location specific considerations


- The assessment of traffic impacts accompanying any DCO submission should consider the operation of the strategic road network in line with national planning practice guidance and DfT Circular 01/2022 *The Strategic Road Network and the Delivery of Sustainable Development*. Where proposals result in a severe congestion or unacceptable safety impact, mitigation will be required in line with current policy. We note that the applicant's Scoping Report – June 2025 Section 10 Traffic and Transport has listed the Circular as a relevant policy requirement and acknowledges the need to engage with National Highways to agree the scoping specific to the preparation of the transport assessment.
- A traffic management plan, which considers both construction and operational phases of the development, will need to accompany any submission.
- The effects of the proposed development should be assessed cumulatively with other schemes and we would expect the applicants to agree an appropriate list of schemes, including committed development in the area.
- Our understanding of the extent of the proposed development site at this time suggests that there are unlikely to be impacts on the A30 operational assets. However, we reserve the right to comment further as more details become available.

These comments are only advisory as the responsibility for determining the scope and form of any EIA Report rests with the Planning Authority. Our comments are made on the basis of the information available to us at this time, and are made

without prejudice to future advice and/or recommendations, which would be made on receipt of a formal submission.

National Highways appreciates contact already made by the applicant's team with helpful references in the scoping document. We look forward to further engagement with the applicant's transport consultants in due course to agree the details in respect of the transport assessment scoping.

Regards

 Spatial Planner
Operations (South West)
National Highways | Ash House | Falcon Road, Sowton Ind. Estate | Exeter | EX2 7LB


Web: nationalhighways.co.uk

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National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://nationalhighways.co.uk> | info@nationalhighways.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

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Date: 22 July 2025
Our ref: 516779
Your ref: BC0310001



Laura Feekins-Bate
Senior EIA Advisor on behalf of the Secretary of State
The Planning Inspectorate
Environmental Services
Operations Group
3 Temple Quay House
2 The Square
Bristol
BS1 6PN

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

BY EMAIL ONLY trelavourlithium@planninginspectorate.gov.uk

Dear Laura

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: Application by Cornish Lithium (the applicant) for an Order granting Development Consent for the Trelavour Lithium Project. Land at Trelavour Downs, St Dennis, Cornwall (the proposed development)

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated and received on 24 June 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development

Summary

- **Natural England has had limited pre-application engagement on the project so far, and our scoping advice is based solely on the EIA scoping report submitted.**
- **Based on the information provided, Natural England considers there may be significant issues relating to designated nature conservation sites.**

Our detailed advice is in the attached Annex A.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO).

Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

For any further advice on this consultation please contact the case officer Sarah Dyke and copy to consultations@naturalengland.org.uk

Yours sincerely

██████████
Higher Officer – Devon, Cornwall & Isles of Scilly Team Email:
██████████@naturalengland.org.uk

Annex A – Natural England’s Advice on EIA Scoping

1. General Principles

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided¹.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

2. Cumulative and in-combination effects

2.1 The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure. An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects
- b. approved but uncompleted projects
- c. ongoing activities
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion

¹ National Infrastructure Planning [Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements](#) (see Insert 2 – information to be provided with a scoping request)

of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

2.2 The submitted Environmental Impact Assessment Scoping Report (pages 9-13) appears to comprehensively list relevant planning applications for consideration in the ES. Natural England particularly highlights the neighbouring proposals at the British Imerys Lithium site (PA24/01374 – scoping opinion for processing plant and associated infrastructure), given its proximity and similar nature. Natural England provided a scoping response for this proposal and, based on the available information, raised no significant concerns. However, the ES should assess any potential in-combination impacts arising from this and any other nearby proposals that may progress concurrently, to ensure cumulative effects are appropriately addressed.

3. Environmental data

3.1 Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>

3.2 Detailed information on the natural environment is available at www.magic.gov.uk. Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

3.3 Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

4. Biodiversity and geodiversity

4.1 The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

4.2 Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) and an [EclA checklist](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

4.3 Many public authorities e.g. National Highways and National Grid have biodiversity duties including taking opportunities for habitat restoration or enhancement. They might have Key Performance Indicators (KPIs) to adhere to via Government policy, or have agreed approaches to BNG. Further information around general duties is available [here](#).

4.4 Designated nature conservation sites

4.4.1 International and European sites

4.4.1.1 The development site is within or may impact on the following

Habitats/internationally designated nature conservation sites:

- Breney Common and Goss and Tregoss Moors Special Area of Conservation (SAC)
- St Austell Clay Pits SAC

SAC	Designated features	Impact pathway
St Austell Clay Pits	S1390 Western Rustwort (<i>Marsupella profunda</i>)	Scrub encroachment, invasive species, hydrological changes/water quality, air quality.
Breney Common and Goss and Tregoss Moors	H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> H4030 European dry heaths H7140 Transition mires and quaking bogs S1065 Marsh fritillary, <i>Eurodryas aurinia</i>	hydrological changes/water quality, air quality, disturbance, scrub encroachment, development/land use changes, habitat fragmentation and isolation, invasive species

4.4.1.2 Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a Habitats Site, either individually or in combination with other plans or projects.

4.4.1.3 European site conservation objectives are available at <http://publications.naturalengland.org.uk/category/6490068894089216> , along with supplementary advice on Conservation Objectives available at [Designated Sites View](#).

4.4.1.4 Evidence Plans are a useful mechanism NSIP applicants can use to agree what information should be provided to the Planning Inspectorate and Natural England when undertaking Habitats Regulations Assessment (HRA). Agreeing the evidence-needs of the project early prior to applying for Development Consent will help reduce delays in the process. More information on Evidence Plans is available [here](#).

4.4.1.5 Natural England's Impact Risk Zones incorporate internationally designated sites and features and can be used to help identify the potential for the development to impact on a European Site. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

4.4.2 Nationally designated sites

Sites of Special Scientific Interest

4.4.2.1 Sites of Special Scientific Interest (SSSI) are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSIs and their special interest features can be found at www.magic.gov.uk.

4.4.2.2 Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

4.4.2.3 The development site is within or may impact on the following **Sites of Special Scientific Interest**:

- St Austell Clay Pits SSSI
- Mid Cornwall Moors SSSI
- Trelavour Downs SSSI – notified for mineralogy
- Crowhill Valley SSSI
- Borlasevath and Retallack Moor SSSI
- Rosenannon Bog and Downs SSSI

4.4.2.4 The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

SSSI	Designated features	Impact pathway
St Austell Clay Pits	S1390 Western Rustwort (<i>Marsupella profunda</i>)	Scrub encroachment, invasive species, hydrological changes/water quality, air quality, physical disturbance and habitat loss.
Mid Cornwall Moors	Key Species and Assemblages <ul style="list-style-type: none"> • Aggregations of breeding birds: Willow Tit (<i>Poecile montanus</i>) • Invertebrate assemblage 	hydrological changes/water quality, air quality, disturbance (physical and non-physical) scrub encroachment, development/land use changes, habitat fragmentation and isolation, invasive species introduction
	Heathland Communities <ul style="list-style-type: none"> • H1 – <i>Calluna vulgaris</i> – <i>Festuca ovina</i> heath • H4 – <i>Ulex gallii</i> – <i>Agrostis curtisii</i> heath • H8 – <i>Calluna vulgaris</i> – <i>Ulex gallii</i> heath • H10 – <i>Calluna vulgaris</i> – <i>Erica cinerea</i> heath 	

SSSI	Designated features	Impact pathway
Mid Cornwall Moors	<p>Mire and Bog Communities</p> <ul style="list-style-type: none"> • M1 – <i>Sphagnum auriculatum</i> bog pool community • M2 – <i>Sphagnum cuspidatum/recurvum</i> (fallax) bog pool community • M3 – <i>Eriophorum angustifolium</i> bog pool community • M4 – <i>Carex rostrata</i> – <i>Sphagnum recurvum</i> (fallax) mire • M5 – <i>Carex rostrata</i> – <i>Sphagnum squarrosum</i> mire • M6 – <i>Carex echinata</i> – <i>Sphagnum recurvum</i> (fallax) / <i>auriculatum</i> (denticulatum) mire • M14 – <i>Schoenus nigricans</i> – <i>Narthecium ossifragum</i> mire • M15 – <i>Scirpus cespitosus</i> – <i>Erica tetralix</i> wet heath • M16 – <i>Erica tetralix</i> – <i>Sphagnum compactum</i> wet heath • M21 – <i>Narthecium ossifragum</i> – <i>Sphagnum papillosum</i> mire • M23 – <i>Juncus effusus/acutiflorus</i> – <i>Galium palustre</i> rush pasture • M25 – <i>Molinia caerulea</i> – <i>Potentilla erecta</i> mire • M27 – <i>Filipendula ulmaria</i> – <i>Angelica sylvestris</i> mire • M28 – <i>Iris pseudacorus</i> – <i>Filipendula ulmaria</i> mire • M29 – <i>Hypericum elodes</i> – <i>Potamogeton polygonifolius</i> soakway • M32 – <i>Philonotis fontana</i> – <i>Saxifraga stellaris</i> spring 	hydrological changes/water quality, air quality, disturbance (physical and non-physical) scrub encroachment, development/land use changes, habitat fragmentation and isolation, invasive species introduction
	<p>Grassland Community</p> <ul style="list-style-type: none"> • MG5 – <i>Cynosurus cristatus</i> – <i>Centaurea nigra</i> grassland 	
	<p>Swamp Communities</p> <ul style="list-style-type: none"> • S3 – <i>Carex paniculata</i> swamp • S10 – <i>Equisetum fluviatile</i> swamp • S27 – <i>Carex rostrata</i> – <i>Potentilla palustris</i> swamp 	
	<p>Woodland Communities</p> <ul style="list-style-type: none"> • W1 – <i>Salix cinerea</i> – <i>Galium palustre</i> woodland • W4 – <i>Betula pubescens</i> – <i>Molinia caerulea</i> woodland • W6 – <i>Alnus glutinosa</i> – <i>Urtica dioica</i> woodland • W10 – <i>Quercus robur</i> – <i>Pteridium aquilinum</i> – <i>Rubus fruticosus</i> woodland • W11 – <i>Quercus petraea</i> – <i>Betula pubescens</i> – <i>Oxalis acetosella</i> woodland • W14 – <i>Fagus sylvatica</i> – <i>Rubus fruticosus</i> woodland • W16 – <i>Quercus</i> spp. – <i>Betula</i> spp. – <i>Deschampsia flexuosa</i> woodland 	

	<ul style="list-style-type: none"> W17 – <i>Quercus petraea</i> – <i>Betula pubescens</i> – <i>Dicranum majus</i> woodland 	
	<p>Notable Species</p> <ul style="list-style-type: none"> Nationally scarce plant: <i>Illecebrum verticillatum</i> (Coral Necklace) Declining and edge-of-range plants: <ul style="list-style-type: none"> <i>Baldellia ranunculoides</i> (Lesser Water-plantain) <i>Centunculus minimus</i> (Chaffweed) <i>Chamaemelum nobile</i> (Chamomile) <i>Platanthera bifolia</i> (Lesser Butterfly-orchid) <i>Radiola linoides</i> (Allseed) 	
	<p>Nationally Scarce and Red Data Book Species</p> <ul style="list-style-type: none"> Butterfly: <i>Eurodryas aurinia</i> (Marsh Fritillary) Mollusc: <i>Omphiscola glabra</i> (Mud snail) Beetle: <i>Hydrochus nitidicollis</i> (RDB beetle) Plant: <i>Euphrasia vigursii</i> (Eyebright, RDB plant) 	
	<p>Mineralogy FM – Mineralogy</p>	
Trelavour Downs	<p>FD – Mineralogy FM - Mineralogy</p>	<p>Scrub encroachment, invasive species, hydrological changes/water quality, air quality, physical disturbance and habitat loss.</p>
Crowhill Valley	<p>W10 - <i>Quercus robur</i> - <i>Pteridium aquilinum</i> - <i>Rubus fruticosus</i> woodland W11 - <i>Quercus petraea</i> - <i>Betula pubescens</i> - <i>Oxalis acetosella</i> woodland W5 - <i>Alnus glutinosa</i> - <i>Carex paniculata</i> woodland W6 - <i>Alnus glutinosa</i> - <i>Urtica dioica</i> woodland W7 - <i>Alnus glutinosa</i> - <i>Fraxinus excelsior</i> - <i>Lysimachia nemorum</i> woodland</p>	<p>Hydrological changes/water quality, air quality, disturbance (physical and non-physical), scrub encroachment, development/land use changes, habitat fragmentation and isolation, invasive species introduction</p>
Borlasevath and Retallack Moor	<p>W1 - <i>Salix cinerea</i> - <i>Galium palustre</i> woodland H4 - <i>Ulex gallii</i> - <i>Agrostis curtisii</i> heath M14 - <i>Schoenus nigricans</i> - <i>Narthecium ossifragum</i> mire M15 - <i>Scirpus cespitosus</i> - <i>Erica tetralix</i> wet heath M16 - <i>Erica tetralix</i> - <i>Sphagnum compactum</i> wet heath M21 - <i>Narthecium ossifragum</i> - <i>Sphagnum papillosum</i> mire M23 - <i>Juncus effusus/acutiflorus</i> - <i>Galium palustre</i> rush pasture M25 - <i>Molinia caerulea</i> - <i>Potentilla erecta</i> mire</p>	<p>Hydrological modification/water quality, air quality, physical disturbance, scrub encroachment and invasive species introduction</p>
Rosenannon Bog and Downs	<p>M1 – <i>Sphagnum auriculatum</i> bog pool community M2 – <i>Sphagnum cuspidatum/recurvum</i> mire M4 – <i>Carex rostrata</i> – <i>Sphagnum recurvum</i> mire M5 – <i>Carex rostrata</i> – <i>Sphagnum auriculatum</i> mire M6 – <i>Carex echinata</i> – <i>Sphagnum recurvum</i> mire H3 – <i>Ulex minor</i> – <i>Agrostis curtisii</i> heath H4 – <i>Ulex gallii</i> – <i>Agrostis curtisii</i> heath W1 – <i>Salix cinerea</i> – <i>Galium palustre</i> wet woodland</p>	<p>Hydrological modification/water quality, air quality, physical disturbance, scrub encroachment and invasive species introduction</p>

4.4.2.5 St Austell Clay Pits SSSI

4.4.2.5.1 The St Austell Clay Pit SSSI appears to lie within the boundary of the proposed project area. This site is designated primarily for the presence of the internationally rare liverwort, Western rustwort (*Marsupella profunda*), which is notable for thriving in disturbed, open habitats often created by mining extraction activities. While the species benefits from certain levels of disturbance, any changes to the site's management or physical environment could pose risks to its continued survival.

4.4.2.5.2 However, with careful planning, the project's management could potentially enhance habitat conditions and improve the SSSI's conservation status by maintaining or creating suitable disturbed areas for *Marsupella profunda*. Natural England would expect the ES to provide detailed assessments of potential impacts on the SSSI and outline clear measures for ongoing management and monitoring to ensure the protection and favourable condition of this rare species.

4.4.2.6 Mid Cornwall Moors SSSI

4.4.2.6.1 The Mid Cornwall Moors SSSI is designated for its populations of rare flora and fauna, in particular European dry heaths, transition mires, and quaking bogs, as well as for supporting important species such as the Marsh Fritillary butterfly and a breeding population of the Willow Tit (*Poecile montanus*). The site's key habitats include upland heathland, wet heath, mire, and wet woodland communities—such as *Ulex minor* – *Agrostis curtisii* dry heath, *Erica tetralix* – *Sphagnum compactum* wet heath, *Narthecium ossifragum* – *Sphagnum papillosum* mire, and *Salix cinerea* – *Galium palustre* wet woodland—each vital for maintaining the area's biodiversity.

4.4.2.6.2 These habitats are highly sensitive to changes in hydrology, physical disturbance, and air quality. The ES should include a detailed assessment of potential impacts in these areas, along with proposed measures to avoid or mitigate atmospheric nitrogen deposition, to ensure the ongoing protection and favourable condition of the SSSI's sensitive habitats and species..

4.4.2.6.3 Parts of the SSSI appear to be within the boundary of the project, including some utility infrastructure adjacent to the proposed TPP support site. The ES should include further detail on how the SSSI will be affected by the proposals, including specific management measures for the TPP support site to minimise disturbance to the designated site.

4.4.2.7 Trelavour Downs SSSI

4.4.2.7.1 It appears that the project will lead to the **permanent loss of Trelavour Downs SSSI**, which is a finite mineralogy geological conservation review site.

4.4.2.7.2 Trelavour Downs is a nationally designated Site of Special Scientific Interest (SSSI) recognised for its exceptional exposure of a lithium-rich pegmatite within the St Austell Granite—one of the only such sites in the UK. It contains two types of lithium-bearing mica, including rare zinnwaldite, and offers vital insights into granite evolution, metasomatism, and the processes that shaped the mineral-rich Cornubian Batholith.

4.4.2.7.3 Historically worked for lithium, the disused pit at Trelavour Downs represents a finite, irreplaceable scientific resource. Infilling, disturbance, or the construction of infrastructure across the site risks not only damaging this unique geological feature, but could lead to its **permanent loss**. Permanent loss of the SSSI would eliminate a unique

resource for understanding granite evolution, lithium mineralisation, and regional geological history.

4.4.2.7.4 We note that in Figure 12 of the Scoping Report is not at an appropriate scale to show the designated sites in relation to the project, and it omits Trelavour Downs SSSI. Impacts on this geological SSSI are better considered in Chapter 11 of the EIA Scoping Report, which should include geodiversity, rather than being located in chapter 6 that relates to land quality. Natural England would also expect to see full details in the ES of compensatory measures and mitigation for the potential permanent loss of the SSSI.

4.5 Regionally and Locally Important Sites

4.5.1 The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local groups. The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. They may also provide opportunities for delivering beneficial environmental outcomes. To find out more about locally important sites, Cornwall Council have detailed interactive mapping available [here](#), The Cornwall Wildlife Trust can also be contacted, full details are available via their [website](#).

4.6 Protected Species

4.6.1 The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#).

4.6.2 Applicants should check to see if a mitigation licence is required using NE guidance on licencing [NE wildlife licences](#). Applicants can also make use of Natural England's (NE) charged service [Pre Submission Screening Service](#) for a review of a draft wildlife licence application. NE then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. [See Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning for details of the LONI process](#).

4.6.3 The ES should assess the impact of all phases of the proposal on protected species. Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

4.6.4 The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

4.6.5 Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

4.7 Priority Habitats and Species

4.7.1 Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

4.7.2 Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#).

4.7.3 An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

4.7.4 The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species • Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

4.7.5 Whilst there are no ancient trees present in the application site, Cornwall Council's [interactive mapping](#) shows some trees subject to Preservation at Trerice Bridge where the utility infrastructure is proposed. For further information, please contact the data owner, [Cornwall Council](#).

4.8 Biodiversity net gain

4.8.1 The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from May 2026.

4.8.2 The ES should use the statutory Biodiversity Metric together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain. The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

4.8.3 Biodiversity Net Gain outcomes can be achieved on-site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies where these are being prepared by local planning

authorities. The Cornwall and Isles of Scilly Local Nature Recovery Strategy is published and available [here](#).

4.8.4 Developers can find out which local sites are designated for nature conservation/ habitat restoration by contacting the Local Nature Partnership [Local Nature Partnerships: map and key contacts - GOV.UK \(www.gov.uk\)](#) to help identify opportunities.

5. Landscape

5.1 The environmental assessment should refer to any relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

5.2 The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

5.3 A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 (3rd edition) produced by LI and IEMA. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

5.4 The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

5.5 To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

5.6 The National Infrastructure Commission has also produced [Design Principles for National Infrastructure - NIC](#) endorsed by Government in the National Infrastructure Strategy.

6. Connecting people with nature

6.1 Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered.

6.2 Goss Moor National Nature Reserve runs across both international and nationally designated sites, namely Breney Common and Goss and Tregoss Moors SAC, and the Mid Cornwall Moors SSSI. It appears from the information provided that the development would link to Goss Moor via utility infrastructure (substation), and potentially via a new community

multi-use trail (disused railway line). This could result in enhanced connectivity to give people improved access to the reserve, and wider ranging links to other green networks. Where present, the creation of new footpaths, cycleways, and bridleways can promote the creation of wider green infrastructure, including the role that natural links have in connecting habitats and providing potential pathways for movements of species. Relevant aspects of local authority green infrastructure strategies should also be incorporated where appropriate.

6.3 Natural England would expect to see further detail in the ES to explain how this part of the proposal would impact the Nature Reserve, how it would connect to it, and what level of disturbance there may be through, noise, dust, lighting and pollution.

7. Soils and Agricultural Land

7.1 Quality Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with the NPS for National Networks. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

7.2 The degree to which soils would be disturbed or damaged as part of the development, and the extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted, should be considered. This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

7.3 Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).

7.4 The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan. The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts. Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction.

8. Climate Change

8.1 Natural England would encourage developers to embed nature based solutions (NbS) and building resilience of the natural environment. NbS reduce risks to people from climate change, for example natural flood management, urban cooling from green infrastructure. Green & blue infrastructure is a way to deliver nature-based solutions, the Natural [Environment Planning Practice Guidance \(PPG\) Natural environment - GOV.UK](https://www.gov.uk/government/publications/environment-planning-practice-guidance-ppg-natural-environment) (www.gov.uk) notes that: 'Green infrastructure can contribute to carbon storage, cooling and

shading, opportunities for species migration to more suitable habitats and the protection of water quality and other natural resources.

8.2 It can also be an integral part of multifunctional sustainable drainage and natural flood risk management.' Natural England has developed the Green Infrastructure Framework which was a commitment in the Government's 25 Year Environment Plan. It is a powerful tool to help deliver the Nature Recovery Network by planning for and investing in space for nature in our urban areas. It provides clear guidance (for local planners, developers, communities, parks and greenspace managers) about the quantity and quality of greenspace required to unlock multiple benefits for climate, health and prosperity.

9. Air Quality

9.1 Air quality in the UK has improved over recent decades, but air pollution remains a significant environmental issue. Approximately 85% of protected nature conservation sites are currently exceeding critical nitrogen deposition loads where ecological harm is expected, and about 87% of sites exceed ammonia levels critical for sensitive lower plants (critical level of 1 µg/m³). This makes air pollution a key threat to biodiversity, and reducing its impact is a priority in the England Biodiversity Strategy.

9.2 The Government's Clean Air Strategy sets ambitious targets, including a 17% reduction in damaging nitrogen deposition over England's protected priority habitats by 2030, a 16% reduction in ammonia emissions from 2005 levels, and substantial cuts in NOx and SO₂ emissions.

9.3 Given these factors, the Environmental Statement should specifically assess potential air quality impacts on nearby sensitive sites, such as the St Austell Clay Pits SSSI and Mid Cornwall Moors SSSI, which may be vulnerable to nitrogen and ammonia deposition. It should consider baseline air quality conditions, evaluate the potential increase in pollutant deposition due to the development, and propose mitigation measures to minimise harm to sensitive habitats and species.

10. Water Quality

10.1 NSIPs (Nationally Significant Infrastructure Projects) can be located in areas where strategic solutions are being developed to address water pollution issues. The planning system plays a key role in determining the location of developments that may contribute to water pollution, meaning planning decisions can significantly impact water quality and the surrounding land. Therefore, the assessment must consider the risks of water pollution and how these can be managed or mitigated.

10.2 Several water-dependent protected nature conservation sites are currently failing condition due to elevated nutrient levels, and consequently, nutrient neutrality is often required to allow development to proceed without causing further damage. The ES should take into account any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans that may be in development or already implemented to mitigate and address elevated nutrient impacts.

10.3 To ensure a comprehensive assessment, the Environmental Statement should:

- Identify all potential pathways by which the proposed development may affect water quality, including direct discharges, surface runoff, groundwater interactions, and indirect effects.
- Establish baseline water quality conditions, noting any existing nutrient enrichment or pollution issues.

- Evaluate the potential for increased nutrient levels or other contaminants as a result of the development, and their likely impacts on nearby sensitive sites i.e. SSSIs and other protected habitats.
- Detail proposed mitigation measures designed to prevent or minimise impacts on water quality, including sustainable drainage systems (SuDS), pollution prevention controls, and habitat protection strategies.
- Demonstrate how the project integrates relevant strategic plans or frameworks, such as Nutrient Neutrality schemes or Diffuse Water Pollution Plans, within its design and management.
- Outline proposals for monitoring water quality throughout construction and operational phases to ensure ongoing protection.

From: [REDACTED]
To: [Trelavour Lithium](#)
Subject: DCO- BC0310001 Trelavour Lithium Project
Date: 14 July 2025 14:45:28
Attachments: [image001.png](#)

You don't often get email from [REDACTED]@networkrail.co.uk. [Learn why this is important](#)

OFFICIAL



Network Rail
1st Floor
Bristol Temple Point
Bristol
BS1 6NL

My Ref: P/TP25/268

Your Ref: BC0310001

Date: 14 July 2025

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

APPLICATION NO: BC0310001

PROPOSAL: DCO- Trelavour Lithium Project

LOCATION:

Dear Sir/Madam,

Thank you for your email dated **24 June 2025** together with the opportunity to comment on this proposal.

Network Rail is a statutory undertaker and owns, operates and maintains the majority of the rail infrastructure of Great Britain pursuant to its network licence. Under the terms of that licence Network Rail is under a duty to secure the operation, maintenance, renewal and enhancement of the network in order to satisfy the reasonable requirements of customers and funders. Therefore any proposed development which is in close proximity to the railway or could potentially affect Network Rail's land interests, need to be carefully considered.

Traffic and Transport

The significant increase in vehicle movements during the construction phase, may have implications for local road networks adjacent to the railway. The EIA should assess the impact of increased traffic on any impacted level crossings within a submitted transport assessment and propose mitigation, including construction traffic management plans.

The impact on nearby railway stations should also be considered within the Transport Assessment in relation to increase in footfall and make suggestions for station improvements that may be required to manage the increased passenger numbers.

The EIA should also evaluate whether additional parking demand, drop-off congestion, or safety concerns (e.g., at level crossings) arise from the development's transport impacts. The Construction Traffic Management Plan should address how construction vehicles will avoid or mitigate disruption near station access routes.

Opportunities for Rail Freight Use

Network Rail supports the use of rail freight as a sustainable transport mode. If the volume of material extraction and movement justifies it, we encourage the developer to explore opportunities for rail freight either directly or in partnership with local terminals. We would be willing to engage further on this point if appropriate.

Lighting Impacts

Construction and operational lighting have the potential to affect the visibility for train drivers vision and the signalling systems. Lighting should be designed to prevent glare or light spill onto the railway lines. The EIA should address potential lighting impacts and propose mitigation strategies such as shielding and focused illumination.

Drainage

The EIA should include a thorough assessment of drainage impacts and should outline sustainable drainage systems (SuDS) or other mitigation strategies to manage run-off and avoid any adverse effects on the railway.

Air Quality and Dust Control

The movement of construction vehicles, particularly HGVs, has the potential to generate dust and reduce air quality. Given the railway's proximity, dust control measures should be implemented to prevent particulate matter from accumulating on railway tracks and signalling equipment, which could impair the safe operation of trains. The EIA should include air quality assessments and propose dust suppression methods during construction and decommissioning.

Yours Sincerely,

MRTPI
Town Planner (Wales and Western)
Network Rail
Temple Point, Redcliffe Way, Bristol, BS1 6NL
www.networkrail.co.uk/property

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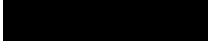
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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, Waterloo General Office, London, SE1 8SW.

Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN


Police Designing Out Crime Officer
Devon and Cornwall Police
St Austell Police Station
1 Palace Road
St Austell PL25 4AL
Telephone 

Re Trelavour Lithium Environment Scoping.

Dear Sirs,

Thank you on behalf of Devon and Cornwall Police for the opportunity to comment on this matter.

The issues which may need to be considered in terms of potential environmental impact are:

Whether specific areas of the site or its facilities would require security fencing and or security gates. To be effective these may need to be of a certain height and meet an industry recognised security standard.

Similarly, would there be a need to have certain spaces/facilities protected by use of CCTV. This may, depending on the location need to be column mounted.

The comments provided regarding site lighting were noted. However, there may also again be areas of the site where security lighting of some form is necessary. This too may potentially need to be column mounted.

Yours faithfully,

[REDACTED]

Police Designing Out Crime Officer
21/7/25

From: [Development Management \(South Hams & West Devon\)](#)
To: [Trelavour Lithium](#)
Subject: FW: BC0310001 - The Trelavour Lithium Project - EIA Scoping and Consultation and Regulation 11 Notification
Date: 25 June 2025 09:32:18
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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Dear Laura,

Thank you for your email. I can confirm that neither West Devon Borough Council or South Hams District Council have any comment to make with regard to the Scoping Opinion.

Best wishes,


Senior Planning Business Support Officer
South Hams District Council / West Devon Borough Council
[@swdevon.gov.uk](mailto:swdevon.gov.uk)


From: Trelavour Lithium <trelavourlithium@planninginspectorate.gov.uk>
Sent: 24 June 2025 10:55
Subject: BC0310001 - The Trelavour Lithium Project - EIA Scoping and Consultation and Regulation 11 Notification

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FAO HEAD OF PLANNING

Dear Sir/ Madam

Please see attached correspondence on the proposed Trelavour Lithium Project.

The applicant for the proposed development intends to make an application for development consent under the Planning Act 2008. The applicant has sought a scoping opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the environmental statement that will accompany its future application.


The Planning Inspectorate has identified you as a consultation body to inform the scoping opinion and is inviting you to submit comments by **22 July 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards
Laura



Laura Feekins-Bate
Senior EIA Advisor
Planning Inspectorate
T 

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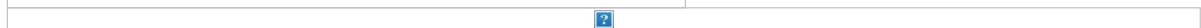
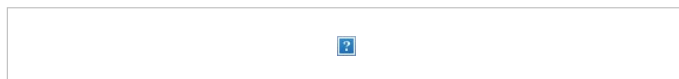
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DPC:76616c646f72



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From: clerk@saintenoderparishcouncil.org.uk
To: [Trelavour Lithium](#)
Subject: BC0310001
Date: 27 June 2025 10:34:54

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Scoping Consultation response on behalf of St Enoder Parish Council:

St Enoder Parish Council would like to have responded after the public consultation in our Parish but unfortunately this is not until 23rd July, and as comments are needed by 22nd July this is not possible. We therefore have no comment at this stage.


Clerk to the Council



Please note I am part time, my normal working days are Monday, Tuesday, Wednesday & Friday.

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From: [REDACTED]
To: [Trelavour Lithium](#)
Subject: RE: BC0310001 - The Trelavour Lithium Project - EIA Scoping and Consultation and Regulation 11 Notification
Date: 15 July 2025 13:03:53
Attachments: [image009.png](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Dear Laura

Thank you for your email and for giving the St. Newlyn East Parish Council the opportunity to submit comments on the scope of the Environmental Statement for the proposed Trelavour Lithium Project.

Due to its location, St. Newlyn East Parish Council does not have a handle on specific issues local to St. Dennis. However, we would comment that all current environmental policies are addressed in the ES as well as how the site will be restored once the lithium extraction has been completed.

If you require any further information, please do not hesitate to contact me.

Kind regards

[REDACTED]

Clerk

From: Trelavour Lithium <trelavourlithium@planninginspectorate.gov.uk>
Sent: 24 June 2025 10:56
Subject: BC0310001 - The Trelavour Lithium Project - EIA Scoping and Consultation and Regulation 11 Notification

Dear Sir/ Madam

Please see attached correspondence on the proposed Trelavour Lithium Project.

The applicant for the proposed development intends to make an application for development consent under the Planning Act 2008. The applicant has sought a scoping opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the environmental statement that will accompany its future application.




The Planning Inspectorate has identified you as a consultation body to inform the scoping opinion and is inviting you to submit comments by **22 July 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards
Laura



Laura Feekins-Bate
Senior EIA Advisor
Planning Inspectorate
T [REDACTED]

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DPC:76616c646f72



Laura Feekins-Bate
Senior EIA Advisor
Planning Inspectorate

Our ref: XA/2025/100392/01

Your ref: BC0310001

Date: 21 July 2025

Sent via email:

Trelavourlithium@planninginspectorate.gov.uk

Dear Laura,

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) –
Regulations 10 and 11**

**Application by Cornish Lithium G5 Limited (the applicant) for an Order
granting Development Consent for the Trelavour Lithium Project (the proposed
development)**

Thank you for consulting the Environment Agency (EA) on the Environmental Impact Assessment (EIA) Scoping Opinion for the above Nationally Significant Infrastructure Project (NSIP) received on 24 June 2025.

We have reviewed the submitted documents insofar as they relate to our remit. A full list of documents reviewed is presented in Appendix 1.

We do not agree with the scope of the EIA and would recommend fish are scoped in to meet the requirements of the EIA regulations. Please see attached Appendix 2 for detailed comments.

Please note this review is on the EIA process only. Other assessments required such as Flood Risk Assessment (FRA), Habit Regulations Assessment (HRA) and Water Framework Directive (WFD) have not been included. We would recommend the developer consult us on the scopes of these studies in due course.

Please note this response does not represent our final view in relation to any future Development Consent Order (DCO), or any environmental permit applications made to us. Our final views will be based on all relevant information including applications and guidance available at the time of submission.

If you require any further details, please contact us on the email address below.

Yours sincerely,



Planning Advisor

Email: Nlteam@environment-agency.gov.uk

List of Appendices

Appendix 1 – List of documents reviewed

Appendix 2 – Detailed comments related to the scope of the EIA

Appendix 3 – General comments for consideration

Appendix 4 – Informatives and advice to the Applicant

Appendix 1 – List of documents reviewed

1. Trelavour Lithium Project Environmental Impact Assessment (EIA) Scoping Report and Appendices, Version 1, Prepared by ERM, Dated: 20 June 2025, Project Number: 0702319.

Appendix 2 – Detailed comments related to the scope of the EIA

Fisheries

Document Reference(s): Scoping Report, Chapter 11	
Issue	Fish have not been included in the baseline or considered in any impact pathways.
Impact	<p>There are notable fish present in the River Fal adjacent to the site. Where fish have not been scoped in or the baseline determined, there is a risk that the proposed development will lead to significant effects on fish in the River Fal.</p> <p>Several impacts have been identified in the Scoping Report including impacts from increased noise during operations, and those identified in Section 7.6 of Chapter 7.</p> <p>Of particular concern is the increased risk of runoff to the River Fal which may contain contaminants that could impact on aquatic ecology and fish.</p> <p>Furthermore, there is the risk of changes in flows in the River Fal which may impact fish through loss of sufficient water quantity and velocity, changes in habitat and changes in water quality.</p>
Solution	Fish populations within the River Fal should be scoped into the EIA with clear identification of potential impact pathways. A detailed baseline of fish populations must be presented, using freely available Environment Agency data (please see: EA Ecology & Fish Data Explorer). According to existing records, the River Fal supports Atlantic salmon, brown/ sea trout, and brook lamprey. In addition to desk-based studies, a programme of in-river fish surveys should be conducted to provide the most accurate and up-to-date baseline data.

Appendix 3 – General comments for consideration

Flood Risk

Document Reference(s): Scoping Report, Chapter 7, Sections 7.3.2.8, 7.4.1.1, 7.5.1.1, 7.8.2.3, 7.8.2.4 and Appendix A, Figure 9.	
Issue	<p>The site largely falls within Flood Zone 1, with Flood Zone 2 and 3 intersecting some of the outer extents of the Order limits. We assess the site based on its highest flood zone designation. Therefore, we consider the risk of fluvial flood risk to be high based on the presence of Flood Zone 3.</p> <p>The Scoping Report omits to sufficiently consider these areas of higher flood risk and any potential increases in risk, as a result of climate change, over the development's lifetime.</p>
Impact	<p>There is likely to be an underestimation of future flood risks, missed opportunities for reducing the risk of flooding overall, and insufficient evidence for the use of the sequential approach in the site layout.</p>
Solution	<p>Fluvial flood risk, taking account of the impacts of climate change on future flood risk, should be included in the Flood Risk Assessment (FRA) to ensure the impacts of flooding over the lifetime of the development are fully understood and mitigated where necessary. The Applicant should demonstrate how the site will remain operational during times of flooding. Opportunities for flood risk betterment should also be explored. We expect production of a site-specific FRA to be committed to in the Commitments Register. We recommend the Applicant discusses their approach to the FRA with us as the project develops. The FRA may identify impacts which require scoping into the EIA process at a later stage if they cannot be resolved (such as potential impacts to third parties).</p>
Additional narrative/ explanation	
<p>The Applicant should assess future flood risk (extents and depths) in line with the climate change projections over the full design life of a development. Guidance on this is provided in Flood Risk Assessments: climate change allowances.</p>	

Flood Modelling

Document Reference(s): Scoping Report, Chapter 7, Section 7.3.2.8	
Issue	<p>Although the site is largely within Flood Zone 1, there are some Ordinary Watercourses which cross the Order limits that have no</p>

	associated Flood Zone mapping due to the small size of their respective catchments.
Impact	Evidence gaps could lead to fluvial flood risk being underestimated.
Solution	Assess the flood risk to the site from watercourses which do not have any associated Flood Zone mapping. This could be undertaken using detailed hydraulic modelling.
Additional narrative/ explanation <p>For information, please note that a catchment area of 3km² was the de minimis in the generalised 2d modelling used to determine the extent of Flood Zone 2 and 3 where no detailed hydraulic modelling is available. There may be flood risk associated with watercourses which have smaller catchments, it is just not mapped or included within the Flood Map for Planning.</p> <p>The new Risk of Flooding from Surface Water (RoFSW) dataset published in January 2025 is a useful starting point for establishing the flood risk associated with smaller Ordinary Watercourses. Further information is available online at: Updates to national flood and coastal erosion risk information - GOV.UK. Please note, however, where a reliance is being placed on existing flood risk products such as the RoFSW mapping then clear justification should be provided as to why this is a suitable proxy for representing fluvial flood risk. In some cases, more detailed hydraulic modelling may be required to understand the impacts of flood risk to the development and because of the development.</p>	

Fisheries

Document Reference(s): Scoping Report, Chapter 7, Sections 7.6.1.6 to 7.6.1.10	
Issue	Runoff from the proposed development into watercourses and the River Fal.
Impact	Increased runoff, that is contaminated (as described in Section 7.6.1.7) will have negative impacts to fish and aquatic ecology in local watercourses and the River Fal. Mortality to aquatic life would be expected and long-lasting impacts to habitat, including fish spawning habitat.
Solution	Robust mitigation measures must be implemented to effectively control runoff and protect the local aquatic ecology. In addition, the Biodiversity Net Gain (BNG) plan should explicitly include watercourses, particularly the adjacent stretches of the River Fal. The proposal should seek to exceed the standard 10% BNG

	target and incorporate a comprehensive programme of works to enhance both the River Fal and its surrounding riparian habitats. These enhancements will not only strengthen ecological resilience but also establish riparian zones as natural buffer strips that help safeguard the river. Furthermore, any mitigation or compensation actions should be closely aligned with the objectives outlined in the River Basin Management Plan.
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Additional narrative/ explanation

The Environment Agency, in collaboration with other organisations, is exploring the removal of barriers to fish migration on the River Fal. This initiative aims to enhance habitats for diadromous species throughout the river, including the headwaters. Consequently, ensuring the availability of high-quality habitat in the headwaters particularly those adjacent to the proposed mine is increasingly important. Moreover, the planned removal of migration barriers presents a valuable opportunity to incorporate meaningful mitigation or compensation measures into the proposal.

Document Reference(s): Scoping Report, Chapter 11, Section 11.2

Issue	The Salmon and Freshwater Fisheries Act 1975 and The Eels (England and Wales) Regulations 2009 have not been included in the list of legislation that is relevant to biodiversity. The legal responsibility on the developer pertaining to this fish specific legislation has not been considered.
Impact	This infers that the impacts on fish from the construction, operation and decommissioning have not been fully considered.
Solution	Both pieces of legislation should be listed as relevant in the biodiversity chapter of the Environmental Statement (ES) and submitted as part of the DCO.

Additional narrative/ explanation

Parts of The Salmon and Freshwater Fisheries Act 1975 relevant to this type of development and that should be considered, are (but not exhaustive) Part 1, Sections 2 and 4.

Parts of The Eels (England and Wales) Regulations 2009 relevant to this type of development and that should be considered, are (but not exhaustive) Part 4.

Geomorphology

Document Reference(s): Scoping Report, Chapter 2, Section 2.5.3	
Issue	It is uncertain whether the proposed overground connection to the electrical network via an old railway line (Section 2.5.3.2) would require construction of new crossings of watercourses for access purposes or upgrade existing culverts and crossings on the route. Furthermore, a possible underground electrical cable connection is also mentioned (Section 2.5.3.3), but it does not indicate the cable route or whether there is any possibility for watercourse cable crossings. There is also no mention of potential access crossings.
Impact	Without knowing the general route of the underground option (if the option is taken up), it is not possible to assess whether there would be any impacts to the water environment from activities such as installation of access crossings, or whether the underground cable will cross rivers by trenchless techniques (preferred) (such as Horizontal Directional Drilling (HDD)) or whether the intention is to use open cut methods (potentially damaging to watercourse). A similar issue can be raised regarding the overhead cable route, as there may be a need to upgrade existing access crossings.
Solution	Include assessment of both potential cabling routes and whether watercourse crossings will be required.
Additional narrative/ explanation	
Further advice and guidance regarding watercourse crossings is provided in Appendix 4.	

Groundwater Protection and Land Contamination

Document Reference(s): Scoping Report, Chapter 2, Sections 2.6.2.9 and 2.6.2.15	
Issue	Foundations are proposed at some elements of the proposed development, including at the Goonvean Waste Facility and Trelavour Processing Plant. The use of certain types of foundations in areas of contamination could lead to the creation of pathways for the migration of contaminants into the underlying aquifer.
Impact	Contamination of controlled waters could be caused.

Solution	Include a commitment to require a Foundation Works Risk Assessment/ Piling Risk Assessment.
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Document Reference(s): Scoping Report, Chapter 6

Issue	The possibility of encountering unexpected contamination during the construction of the proposed development has not been mentioned within the Scoping Report.
Impact	If a protocol for how to manage unexpected contamination in accordance with Land Contamination Risk Management guidance is not proposed, then risks to controlled waters may not be adequately assessed and mitigated.
Solution	Ensure that a commitment to managing unexpected contamination is included in the Construction Environment Management Plan (CEMP).

Document Reference(s): Scoping Report, Chapters 6 and 7

Issue	The Scoping Report has not included the following document: <i>Environment Agency 2018, The Environment Agency's approach to groundwater protection</i> .
Impact	This document details our approach to groundwater protection and explains what activities can and cannot take place on Principal and Secondary aquifers, as well as within Source Protection Zones.
Solution	Follow the Environment Agency's approach to groundwater protection, Groundwater protection - GOV.UK (www.gov.uk) ; The Environment Agency's approach to groundwater protection (publishing.service.gov.uk) to ensure sufficient mitigation to pollution is incorporated into the project design.

Document Reference(s): Scoping Report, Chapter 7

Issue	Dewatering may be required within the proposed development. This will need careful management to avoid affecting groundwater resources and quality.
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Impact	Without a clear strategy, including acknowledgment of when activities are exempt or may require a permit, groundwater quality and resources could be affected.
Solution	Include a Dewatering Management Plan as part of the EIA to ensure groundwater quality and resources are adequately managed and mitigation measures adopted.
Additional narrative/ explanation There may be an opportunity for the project to enhance local groundwater resources by establishing mine-water treatment during the dewatering process. The area has been heavily exploited for minerals, including with dewatering, so establishing what the new 'normal' groundwater levels should be is an important consideration of the scheme.	

Document Reference(s): Scoping Report, Appendix A Figures	
Issue	Figures 3, 4, 5 and 6 indicate areas known as 'Water Storage Area' but this is not defined in the report.
Impact	Potential for ambiguity concerning elements of the proposed development could lead to insufficient mitigation measures being proposed.
Solution	Ensure all elements of the proposed development are explained fully within the EIA so that risks and mitigation measures associated with them can be understood.

Surface Water Quality

Document Reference(s): Scoping Report, Chapter 2, Section 2.4.3.2 and Chapter 7, Section 7.6.1.6	
Issue	<p>The Scoping Report does not mention if any of the proposed offices at Trelavour Processing Plant have a foul water provision. A foul water/ water from welfare facilities strategy has not been discussed.</p> <p>Furthermore, no effects from foul water are considered as a likely significant effect from potential for contamination of surface waters as a result of the proposed development arising from surface water management and site discharges.</p>
Impact	Any foul waste generated will need to be contained, and then either connected to a sewer, tankered away, or treated and

	discharged under permit. If not managed correctly it can greatly increase the amount of nutrients, and other contamination, in receiving watercourses and water bodies.
Solution	Foul water disposal strategy should be provided and any potential for foul water discharge should be considered as a likely significant effect.
Additional narrative/ explanation	
<p>This is particularly relevant as Section 7.3.2.16 states that the site is entirely within a Nitrate Vulnerable Zone (NVZ).</p> <p>If sewage will be discharged to public sewer, the Applicant should consult with the local water company to ensure that adequate sewer capacity is available, and no adverse effects will occur because of the connection. If treatment and discharge at the site is required, the Applicant should consider any potential impacts of this discharge and confirm that a water discharge activity permit will be sought. If road transport to an offsite disposal facility is required, then there should be regard for this within the waste management procedures.</p>	

Document Reference(s): Scoping Report, Chapter 2, Section 2.11.2.1	
Issue	Useful guidance documents regarding Sustainable Drainage Systems (SuDS) are not referenced.
Impact	If guidance documents are not referred to, useful understanding may be missed.
Solution	Refer to CIRIA's The SuDS Manual (C753) and Guidance on the construction of SuDS (C768).

Document Reference(s): Scoping Report, Chapter 4, Section 4.6.2	
Issue	A Decommissioning Environmental Management Plan (DEMP) is not mentioned and should be included as part of the environmental management plans prepared.
Impact	If a DEMP is not prepared there may be inadequate management during the decommissioning phase.
Solution	Ensure that an outline DEMP is included in the submitted documents to support the application and a full DEMP is developed prior to decommissioning.
Additional narrative/ explanation	

The following may be useful when the pollution prevention plan and the outline construction, operation and decommissioning environmental management plans are being finalised: [Pollution prevention for businesses - GOV.UK](https://www.gov.uk/guidance/pollution-prevention-for-businesses)

Document Reference(s): Scoping Report, Chapter 7, Table 7.1

Issue	Contamination of surface water and groundwater from use and movement of plant and equipment and handling and storage of fuels, oils and other pollutants is proposed to be scoped out for constructions, operation and decommissioning.
Impact	Any measures detailed in the CEMP and Excavated Materials Management Plan (EMMP) to mitigate any potential impacts have not yet been seen so we are unable to be certain that risks of deteriorating the water quality of the water environment will be sufficiently mitigated against.
Solution	We will review the surface water contamination mitigation measures set out in the outline CEMP and EMMP once the documents are available and note that they may identify impacts which may be needed to be scoped into the EIA later in the process if they cannot be resolved.

Additional narrative/ explanation

We note the CEMP and EMMP are listed in the Applicant's Template Commitments Register (Appendix B in the Scoping Report). We expect commitment to these documents to be formalised within the Commitments Register and ensure water quality is listed as a 'relevant aspect'.

Document Reference(s): Scoping Report, Chapter 7, Sections 7.4.2.1, 7.4.3.1 and 7.6.1.1

Issue	<p>There is no reference to trenching with the likely significant effects from potential contamination of water resources arising from general demolition, construction and closure/ decommissioning activities.</p> <p>Trenching is listed as a construction and operation activity that may cause disturbance, however it is unclear if it is open trenching or trenchless methods, such as horizontal direction drilling, that are being considered.</p>
Impact	Disturbance from trenching could increase potential contamination of water resources.

	HDD, or other trenchless installation methods, could impact the water quality of the water environment if not sufficiently managed.
Solution	<p>Include this as a likely significant effect to be considered in the EIA and confirm if trenching is via open trenching or trenchless installations.</p> <p>If HDD is being used, it should be supported by the development and implementation of a Drilling Fluid Breakout Plan.</p>

Document Reference(s): Scoping Report, Chapter 7, Section 7.5.1.2	
Issue	Not all relevant management plans we would expect to see within the CEMP are listed.
Impact	If the management plans as part of the CEMP are insufficient there may be inadequate management during the construction phase.
Solution	<p>In addition to the EMMP, a Stormwater Management Strategy, including a Sediment Control and Erosion Plan (SCEP) and a Water and Wastewater Management Plan, the following plans should also be prepared:</p> <ol style="list-style-type: none"> 1) Surface Water Management Plan 2) Oil, Fuel and Chemical Storage Plan 3) Environmental Monitoring Plan
<p>Additional narrative/ explanation</p> <p>A Surface Water Management Plan (SWMP) is a plan which outlines the preferred surface water management strategy in a given location. In this context surface water flooding describes flooding from sewers, drains, groundwater, and runoff from land, small water courses and ditches that occurs as a result of heavy rainfall.</p> <p>Further guidance of this type of plan can be found here: Surface Water Management Plan Guidance</p> <p>The environmental monitoring plan, especially with regard to water quality, should reflect locational variation in the site. For example, monitoring upstream and downstream of any proposed water discharges. Ideally the monitoring plan will include enough monitoring samples to detect any seasonal variation.</p>	

Water Resources

Document Reference(s): Scoping Report, Chapter 2	
Issue	There is a lack of detail regarding the water demands associated with specific activities.
Impact	If demand is not known, the scope of the impact or magnitude of abstraction (changes to existing or new) from these sources cannot be evaluated.
Solution	A more detailed water supply strategy should be developed which seeks to better evaluate the magnitude of impacts to the sources of supply considered.
<p>Additional narrative/ explanation</p> <p>A more comprehensive water supply and abstraction strategy should be developed as part of the EIA which seeks to estimate the requirements for individual activities described in the report and which includes but is not limited to:</p> <ul style="list-style-type: none"> • Dust suppression • Machinery/wheel wash • Concrete batching • Drilling fluids • Process water including slurries and process/transportation of materials • Potable and domestic supply (understood to be provided by water company mains) • Dewatering management (and associated discharges) including re-use <p>We are encouraged that the Water Management Plan described in Section 7.5.1.2 promises to do this and appears to be associated with the development of the CEMP. This suggests that it will be produced post DCO issue and it is unclear if it will only apply to construction phases. However, we recommend that this appraisal is also undertaken for operational and decommissioning water use and dewatering management and is undertaken as part of the EIA.</p> <p>We recognise that the need for abstraction licences is acknowledged in Section 3.5 and that the permitting process will provide determination of environmental impacts separately to planning; however, we encourage this early evaluation in order to allow time to understand the wider impact of the scheme and to identify any potential obstacles or opportunities associated with sources of supply considered to meet demands in good time of commencement.</p>	

Document Reference(s): Scoping Report, Chapter 7	
Issue	<p>Abstraction is already a licensed activity on the site under licence reference 15/48/020/G/0087 which has complex impacts upon groundwater and surface water.</p> <p>Abstraction across the whole site is measured using a water balance formula due to the complexity of use from different sources at different times. This was agreed with the Environment Agency in 2009.</p>
Impact	Any adoption of the use of these existing licences or intentions to obtain licences for additional abstraction for new activities will have different impacts to groundwater and surface water than their previous operation used in prior china clay mining.
Solution	The assessment in the EIA will need to acknowledge that the baseline is already a reflection of abstraction activities within the pits and the EIA will need to effectively explain and model the different abstraction regime from the pits themselves under this new operation and impact on local watercourses and groundwater.

Document Reference(s): Scoping Report, Chapter 7	
Issue	The practical implications for supply to the project itself during times of water stress should be considered.
Impact	Licence conditions may restrict access and operation during increasingly frequent drought conditions.
Solution	A more comprehensive water supply strategy should be developed as part of the EIA which considers the practical implications for the proposed development during prolonged dry weather and drought.
<p>Additional narrative/ explanation</p> <p>We note that impacts to local surface water features and other abstractors or lawful water users associated with dewatering activity should be scoped in and that potential water stress exacerbated due to future climate change experienced over the proposed development's lifetime is also included within scope described in 7.6.1.10.</p> <p>Section 7.3.2.10 suggests that a review of the catchment abstraction licensing strategy appears to have already been undertaken noting that groundwater resource in this catchment although limited is not necessarily restricted and the resource assessment reflects that of surface water availability.</p>	

Although surface water availability is good, a minimum residual flow condition may be applied to new licences and could prevent abstraction during prolonged dry weather and drought conditions. There is insufficient detail at this stage to know the extent of new abstraction required or if the use of existing licences is intended.

Document Reference(s): Scoping Report, Chapter 7

Issue	There has been insufficient consideration of the importance of the value of surplus water and lack of integrated water planning across the wider landscape.
Impact	Surplus water from the processing and dewatering is seen as a 'waste' material whereas it is a valuable commodity. Restoration plans do not mention future water management plans as a key element to consider.
Solution	The proposal should consider opportunities to safeguard future water resources and contribute to the strategic actions required for Cornwall.

Additional narrative/ explanation

The pressures on public water supply and the environment are ever increasing, due to climate change and population growth and the South West of England is not isolated from these national pressures on water resources. It is widely recognised that significant investment is needed in order to meet supply deficits by 2050.

The minerals and mining sector are a key stakeholder at multi-sector group which supports the development of the [West Country Water and Environment regional water resources plan](#). The sector has been identified as being a potential source of water for public water supply in the future. This may not be as relevant when the site is operational but should form part of the optioneering for closure and restoration.

The new [Water Resources National Framework](#) published in July 2025 emphasises the need for better integrated water planning for a resilient future to support industrial growth, population growth and nature.

Waste

Document Reference(s): Scoping Report, Chapter 17, Section 17.3.3

Issue	The information used as basis for assessment on landfill capacity is incorrect.
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Impact	This could lead to potential errors with waste management planning.
Solution	The Applicant should review and revise available capacity and the operating status of the listed facilities.

Appendix 4 – Informatives and advice to the Applicant

Flood Modelling

The Scoping Report notes that the proposed development has an operational lifetime of 20 years, with site preparation taking around 2 years and decommissioning taking between 2 and 5 years. On this basis it would be reasonable to use the 2050s epoch as the horizon to assess climate change impacts over (Section 7.8.2.3). Further details regarding the application of climate change allowances can be found online at: [Flood risk assessments: climate change allowances - GOV.UK](#). As the development is classed as an NSIP you may wish to assess the impacts of a credible maximum climate change scenario on flood risk. In the context of fluvial flood risk this would mean applying the Upper allowance for the 2050s epoch for fluvial flows.

Geomorphology

Where necessary, to aid in the design of new crossings/ upgrade of existing crossings, including cabling under watercourses, please see the general considerations below. Should it be determined that new access crossings are required, or existing crossings need upgrading, it is strongly encouraged that culverts – especially “closed” box or pipe culverts, be avoided. Open span crossings are preferred, with open portal/ arch culverts being acceptable at most.

General considerations

The following are general guiding principles to consider when designing watercourse crossings to avoid negatively affecting geomorphology and natural processes:

Geomorphologically dynamic behaviour is deemed likely to intensify in the next decades in line with [Flood Estimation Handbook \(Flood Estimation Handbook \(FEH\) | UK Centre for Ecology & Hydrology \(ceh.ac.uk\)\)](#). Therefore, any infrastructure developments should also take some account of the likelihood for increased lateral and vertical river dynamics anticipated to result from continued hydro-climatic intensification (e.g. ‘a flood-rich epoch’) over the remainder of the 21st century (i.e., future proofed designs that are not just based on present-day baseline geomorphological configuration/ behaviour).

Cable crossings

- Avoid unnecessary interference with natural processes. Trenchless techniques, such as HDD, are encouraged to minimise the likelihood of cables entering the water environment.
- Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change.

- Ensure cable infrastructure is located outside of areas expected to be impacted by fluvial activity over the duration of the project.
- Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which are left in-situ after decommissioning could be exposed by river movement, becoming an impediment to natural processes.
- Consider opportunities to deliver WFD mitigation measures/ BNG uplift as part of the design.
- Any infrastructural developments on river/ floodplain environments should be designed and delivered to have a minimal impact on natural river dynamics (e.g. erosion, deposition, meander migration etc.) and should not place any significant limitations on future river restoration projects.
- Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables to surface level in floodplains earmarked for future river restoration or flood defence works (including construction of bypass channels).

WFD

- Any potential construction, operational, and decommissioning phase impacts that the proposed development may have on the river must be subject to a WFD Assessment to the satisfaction of the Environment Agency.

River and access crossings

- If river crossings (bridges/ culverts) are required as part of the development, we (Environment Agency) would expect to see geomorphologically robust designs that will cause minimal impacts on natural fluvial processes operating in the river/floodplain environment over the course of the 21st century.

Further guidance in regard to river crossings can be found in the following document:

[SEPA, 2010. Engineering in the water environment: good practice guide River crossings Second edition. SEPA](#)

Notes:

- i. WFD applies to all surface waterbodies, not just those designated for monitoring purposes.
- ii. Small watercourses and WFD - watercourses with a catchment less than 10km² connected to a downstream WFD waterbody take the classification of that waterbody.
- iii. BNG guidelines indicate that structures built within 10m of the bank top of a watercourse qualify as encroachment, which may affect the uplift score calculated using the BNG Watercourse metric.

[BNG guidance is mentioned here because our [EA] usual easement for structures, operations, launch pits is to be at least 8m away from the watercourse bank or landward base of fluvial defence structure/embankment (16m if defence structure is for tidal purposes). As stated in the note above, BNG watercourse metric considers anything within 10m of banktop to be encroaching on the watercourse.]

Water course sensitivity

- Care should be taken by applicants when determining watercourse sensitivity, especially the use of Q95 scores. Rivers with a higher Q95 flow are not more sensitive than rivers with a lower Q95. In the case of water quality, the reverse of this is true, with less dilution meaning a higher sensitivity to change. Some watercourses with low Q95 may also be winterbournes, and therefore cannot accommodate change easily, as they would be dry for most of the year.
- WFD designation is a method of monitoring and classifying the ecological health of the water environment and not an indication of greater or lesser sensitivity to change. Therefore, watercourses with a WFD designation are no more sensitive than those which have not been designated.

Sensitivity to change cannot be determined from a desk study alone. When determining the sensitivity of a watercourse, the Applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment.

Biodiversity

Ecological Surveys

We would expect the proposal and ES to include BNG assessments to industry standard using MoRPH assessment and SSSI / SAC surveys to a higher standard using National Vegetation Classification (NVC) standard.

We expect to retain Otters in the survey needs for this EIA.

Other instream ecological monitoring requirements such as invertebrate and aquatic plants will be required to set a baseline for the project and monitor any impacts associated with the proposal over the 20 years life of the mine.

Prior to site clearance we expect surveys for the Western rustwort *Marsupella profunda* to be completed for the whole development site in areas suitable for the colonisation of the species. This species is only found in the china clay mica tips of Cornwall. [Western rustwort \(Marsupella profunda\) - Special Areas of Conservation. 2000425](#). Protection of SSSI / SAC features is expected to be of the highest priority in the development of the mine.

Flow / rain data

The Applicant should review the Flow / Rain data which is available at [Hydrology Data Explorer - Explore](#) and consider supplementary flow monitoring close to the site to monitor possible impacts of drawdown of the pit network.

Monitoring plans

Monitoring of geomorphological impacts of changing flow patterns in rivers should also be considered as part of the monitoring plans. Surface water and ground water abstractions can reduce flows and lead to impacts on morphology and ecology of watercourses. Geomorphology assessments will also identify impacts from sediment loading, erosion, instream modifications and barriers.

Invasive Non-Native Species

There is no mention of the risk of transfer of aquatic Invasive Non-Native Species (INNS) species by the transfer of water from the pits such as for the dewatering of Treviscoe. The report only identifies terrestrial invasives such as rhododendrons. We expect an INNS risk assessment to be included in the EIA using industry standards for water transfer. Please see the following guidance:

- [SAI-RAT: assessing the risk of invasive species for SROs](#)
- [INNS-challenges-for-the-water-environment.](#)
- [Non-native species » NNSS](#)

Ambition for sustainable mining future

A significant amount of the ecology in the mineral catchments has been modified and ecologically degraded by the historic and current levels of mineral exploitation. The baseline for the ecology in this application is expected to be of a degraded nature.

All mineral companies have a responsibility to restore the historic degraded mineral landscape as part of their duties under planning obligations. Currently this does not address the wider eco-hydrological functioning of these catchments.

The mitigation and compensation package associated with this report is an opportunity to expand the ecological restoration ambition to the streams, wetlands and floodplains within the Fal catchment.

Legal drivers

The opportunity to restore the degraded headwaters will meet the BNG and Local Nature Recovery Strategy (LNRS) requirements triggered by this mineral proposal. We are pleased to see commitment to BNG at this point in the planning process.

Restoration of these degraded headwaters will also satisfy The Water Environment (Water Framework Directive) (England and Wales) 2017 Regulations and Special

Area of Conservation (SAC) and Sites of Scientific Improvement (SSSI) improvement plans.

Restoration of the eco-hydrology of the catchment will benefit multiple priority species and habitats and provide opportunities to protect the river systems downstream from climatic events such as flood and prolonged dry weather events. Since the ecological baseline is expected to be so low due to the previous mineral exploitation then the statutory 10% BNG would be achieved without raising the ecology far towards its pre-degraded state. An ambitious aim for the project could be to delivery 20%+ BNG for this application given the additional requirement in policy for general 'enhancement' of ecology and biodiversity, the declaration of the Cornwall Council biodiversity crisis and the exceptionally low starting point for ecology in this area due to previous industry activity.

Monitoring and enhancement plans

In other large mineral expansion projects in the southwest, the EA have ensured the mining company keep an environmental record of the impacts, and importantly the environmental improvements, to the sites they are working on. An Environmental Development Management Plan (EDMP) can keep a track of the 'profit and losses' over the life span of the activity. The delivery of improvements to the wider environment is then documented, planned and approved by members of the EDMP group who should include but not be limited to, Mining Industry, Natural England, Cornwall Council, Environment Agency. This will be a method of reporting within the Applicant's communication plan.

It is particularly important to capture primary site clearance and the loss of vegetated and partially vegetated areas for the development of the site. These can be identified early and planning for offset can be delivered early in the process of site development. A series of Biodiversity Enhancement Zones (BEZ) can be developed to provide this offset and ecological buffering of the site. This can also help with air emission control for dust emissions.

Areas of identified species and habitats to be retained and enhanced on the site should be protected from the impacts of mining operations (Habitat and Species Protection zones). These protection zones will form part of the over BEZ's network and managed under the structure of the suggested EDMP to ensure they are retained in good condition or move to improved ecological condition.

Good quality habitats should be ranked in value on a local and national scale. This should drive the working and tipping strategy to protect the best quality habitats, protected site, species and habitats on the site.

We recommend the Applicant consider creating suitable habitat for the Western rustwort *Marsipella profunda* as part of the proposed ecological enhancements.

Our mapping system shows multiple barriers in the watercourses around the site. These are likely to be barriers to fish migration. We recommend the Applicant consider opportunities for improvements to these structures.

Environmental aims and ambitions to aid with the development of sustainable, climate friendly mining operations

With modern regulation and clear steer for a [Nature Recovery Strategy](#) to reverse the Biodiversity Crisis it is essential for industry to provide a more sustainable mining future. Please see: [State of Nature 2023 - report on the UK's current biodiversity](#)

Onsite and offsite impacts and benefits can link to LNRS, BNG, Landscape Recovery, ELMS, EWG scheme and national Species Recovery programme.

This can be planned and delivered including some of the following objectives.

1. Ecological Restoration for freshwater habitats
 - Reconnect rivers with floodplains.
 - Restore river and wetland base flows and reduce artificial hydrological manipulation.
 - Enhance biodiversity through habitat restoration (wetlands, heathlands, moors, peat, woodlands).
 - Connect and link up existing features.
 - Create the correct environment to reintroduce priority species (e.g., beavers, otters, trout, salmon, marsh fritillary).
2. Carbon
 - Develop local carbon sequestration opportunities (peatlands, woodlands, wetlands).
 - Adapt to climate pressures (drier summers, intense rainfall) by building resilient catchments.

Energy and Carbon – Energy supply for this proposal should look to all sectors to provide available energy as well as the grid and the incinerator. Other supply networks exist with lower carbon footprints which could have positive impacts on the carbon calculations. Hydrogen / solar farms in proximity / hydropower from dewatering operations / wind opportunities / gas.

Surplus wind from turbines energy generation is subject to restrictions. “Quota fulfilment” is where turbines reach a limit on how much energy they are allowed to deliver to the grid, so there is opportunity for surplus can be re-directed to industry.

3. Climate resilience catchments

- [The impact of climate change - Cornwall Council](#) suggests that the seasonality issues will impact all of Cornwall with some hot spots.
- Seasonality planning is essential to deal with rainfall increase and hotter drier summers. Wildfires / Abstraction halt orders / slowing vegetation growth / wetland drying / habitat stress / soil moisture deficit all will play a part in our changing climate. There are going to be significant implications to the available water resource for all uses
- We need to protect existing water resource for industry, public water supply and restoring rivers and wet dependant habitats.

Restoration and landscaping phases – Traditional approaches to restoration of the mine site needs to be reviewed to fit into climate change predictions to develop more resilient catchments. With predicted changes to our habitat types and water dependency trends, the restoration of the mine should consider retaining water in the landscape to provide for wetland habitats and future water resource. The flooded pits are already becoming an important water resource for the county. Filling these in could lose that essential opportunity to deal with the future.

References and useful documents:

- State of Nature Report [State of Nature 2023 - report on the UK's current biodiversity](#)
- Cornwall Council Ecological Emergency
- [Biosecurity and pathways » NNSS \(nonnativespecies.org\)](#)
- [A Nature Recovery Strategy for Cornwall and the Isles of Scilly | Let's Talk Cornwall](#)
- Cornwall Wildlife Trust restoration concept of St Austell mining area for ECCI

Permitting

General advice

Many of the proposed activities at the site may require control via permits or licences. Although we appreciate that the project is in an early stage, an understanding of which permits will be required as soon as possible will help move the project forward. Not providing enough information about which activities will require permits could lead to delays and potential environmental risks. The Applicant should produce a clear list of which permits will be required for each activity. Given the timeframe to determine environmental permits, we encourage the Applicant to engage with us on permit requirements at the earliest possible stage.

The Environment Agency offers an enhanced pre-application advice service for environmental permit applications. Further information is provided here:

<https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>

Twin- or parallel-tracking of environmental permit applications, and a DCO application is recommended. Further information is provided here:
<https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals>

Water Discharge Activity Permit

The obligation to apply for and comply with a water discharge activity permit could be used as appropriate mitigation for several impacts that could occur during construction.

If discharge at the site is required, the Applicant should consider any potential impacts of this discharge and confirm that a water discharge activity permit will be sought from the Environment Agency.

A permit does not mean that applicants can deteriorate the watercourse, and it may not be granted. Only clean, uncontaminated water should be discharged to surface water or groundwater and any permits need to be planned for well in advance of construction.

Discharging runoff to watercourses has the potential to transport pollutants and silt and should be a last resort with mitigation in place to reduce the impact. Additional guidance in relation to discharging and permits is available at the following links:

[Discharges to surface water and groundwater: environmental permits - GOV.UK](#)

[Get advice before you apply for an environmental permit - GOV.UK](#)

Installation Permit

Operational activities at the proposed development will need prior authorisation by an environmental permit or permits, including for an 'Installation' comprising multiple activities including mineral processing, production of inorganic chemicals, management including treatment and deposit of waste, and associated water discharge activities. Permission will also be required for water transfer/ abstraction and likely other water discharge activities.

The Applicant will need to demonstrate the use of 'best available techniques' within the meaning of the Industrial Emissions Directive, with the objective '...to prevent and, where that is not practicable, to reduce emissions and the impact on the environment as a whole' in any application for an environmental permit for an 'Installation'.

The Environment Agency will consider the acceptability of emissions to all media at the time it determines applications for environmental permits in relation to the

proposed industrial activities. This will include assessment of point source emissions to air, and to the surface water environment, also emissions to groundwater particularly from deposits of waste material. Other emissions including dust, and noise will also be assessed.

Low frequency noise

Emissions of low frequency noise are not mentioned in the Scoping Report. Absence of information establishing baseline conditions and investigating likely emissions of low frequency noise from the proposed industrial activities will result in a key omission to the ES. Include in the ES establishment of baseline conditions and investigation of emissions of low frequency noise from operation of industrial activities at the proposed development. The Environment Agency is aware that operation of large mechanical equipment in mineral processing activities can produce significant emissions of low frequency noise, which can propagate over distances and adversely impact local communities. Low frequency noise is challenging to control. Assessment of low frequency noise is outside the scope of BS4142. The Environment Agency will be the lead regulator for emissions of noise including low frequency noise from operation of activities authorised by an environmental permit for an Installation.

Numerical sound levels

The Scoping Report includes multiple suggested associations of Lowest Observed Adverse Effect Level (LOAEL) and Significant Observed Adverse Effect Level (SOAEL) to numerical sound levels (Chapter 8). The Environment Agency does not automatically recognise these associations. There could be potential for misunderstanding of extent of adverse noise impact. The Applicant should exercise caution in assigning numerical values to LOAEL and SOAEL. The Environment Agency will be the lead regulator for emissions of noise from operation of activities authorised by an environmental permit for an Installation.

Greenhouse gas emissions

It is not explicitly clear that assessment of greenhouse gas emissions will include all relevant indirect emissions (Scope 2 and Scope 3 emissions) for the Trelavour Processing Facility (Chapter 18). Therefore, there is potential for incomplete assessment of greenhouse gas emissions. The Applicant should ensure indirect emissions (Scope 2 and Scope 3 emissions) for the Trelavour Processing Facility are included in the assessment.

We understand operation of the Trelavour Processing Facility will require import of significant quantities of reagent (e.g. rail import of limestone), and on-site production of sulphuric acid for which raw materials will also need to be imported. Greenhouse gas emissions associated with the production and supply of raw materials should be included in the assessment.

Greenhouse gas emissions assessment for this proposal should include full assessment of indirect emissions, including in energy use, and in the supply chain for operation of the proposed activities (Scope 2 and Scope 3 emissions).

We agree that the Cornwall Climate Emergency Development Plan Document is relevant for the proposed development (Section 3.4.3.13).

Cumulative effects

It is not explicitly clear that assessment of greenhouse gas emissions, and other effects, will include all relevant cumulative effects (Chapter 18 and 19). Therefore, there is potential for incomplete assessment of greenhouse gas emissions, and other effects. The Applicant should ensure all relevant cumulative effects are considered in the assessment of greenhouse gas emissions, and other effects. Please see:

<https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment>

“...In this advice, ‘other existing and, or approved development’ is taken to include existing developments and existing plans and projects that are ‘reasonably foreseeable’.”

For example, we note the inclusion of various proposed developments in Table 19.1, including a separate significant proposed lithium extraction project within a few miles of the Trelavour Lithium Project: ‘Imerys British Lithium, Greenbarrow Lithium Project’. We note that the Cornwall Energy Recovery Centre (CERC) operated by SUEZ is mentioned in the context of some aerial emissions in Section 9.3.2.9 including NO_x/NO₂, NH₃ and SO₂, and PM₁₀/PM_{2.5} and metals, but not in the context of greenhouse gas emissions such as CO₂.

Water use

It is not explicitly clear that the water use requirements of the proposed development have been or will be quantified (Chapter 7 and 19). Therefore, there is potential for insufficient assessment of the sustainability of water use requirement of the proposed development, including cumulative effects. The Applicant should include quantification of water use requirements of the proposed development, and assessment of availability of that water resource, including cumulative effects.

Please see: <https://www.legislation.gov.uk/ukxi/2017/571/schedule/4>

The ES must include a description of both water use and water emissions from the proposed industrial development, including:

“...A description of the likely significant effects of the development on the environment resulting from, inter alia:

...the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;”

The water use requirements of the proposed development must be considered in the context of available supply, and cumulative effects.

Note any environmental permit issued by the Environment Agency authorising the operation of industrial activities at an 'Installation' will require efficient use of raw materials, including efficient use of water.

Control of Major Accident Hazards Regulations (COMAH)

We agree the Control of Major Accident Hazards Regulations (COMAH) Regulations 2015 may be relevant for the proposed development (Chapter 18). The Applicant will need to consider the inventory of dangerous substances and any aggregation rules in determining the extent to which COMAH applies.

Deposit/ disposal of waste

Risk of pollution from proposed deposit/ disposal of wastes in Goonvean and Treviscoe Pits is not explicitly considered (Chapter 17). There is potential for insufficient assessment of the pollution potential of waste deposits in Goonvean and Treviscoe Pits. The Applicant should ensure the risk of pollution from proposed deposit/ disposal of wastes in Goonvean and Treviscoe Pits is in scope.

The Environment Agency will consider any hydrogeological risk assessment relating to the proposed deposit of wastes in Goonvean and Treviscoe Pits at the time it determines an application for an environmental permit to authorise those activities. Engineered lining/ containment of wastes may be required. The specification and design of the lining system required will depend on the polluting potential of the waste types to be deposited.

Any proposed deposit of wastes in Goonvean and Treviscoe Pits will need to satisfy the requirements of the Groundwater Directive, see Schedule 22 of the Environmental Permitting (England and Wales) Regulations 2016.

Careful consideration of implications of any existing authorisations for waste deposit activities within the proposed development area will be necessary.

Waste streams

The Applicant should assess waste streams expected to be produced in turn and assess whether the proposed end point for each waste stream constitutes a recovery of waste or a disposal of waste. Guidance can be found regarding this matter: [Waste recovery plans and deposit for recovery permits - GOV.UK](#)

From: [Treverbyn Parish Council Clerk](#)
To: [Trelavour Lithium](#)
Subject: RE: BC0310001 - The Trelavour Lithium Project - EIA Scoping and Consultation and Regulation 11 Notification
Date: 09 July 2025 12:22:09
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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Dear Sir/Madam,

Treverbyn Parish Council acknowledges receipt of the scoping consultation in relation to the proposed Trelavour Lithium Project.

As a mere neighbouring Parish, we trust that all relevant heritage and environmental matters will be given full and careful consideration throughout the Environmental Impact Assessment process. The area includes a number of sensitive environmental features and areas of historical importance, and it is essential that any potential impacts are properly assessed and mitigated.

We look forward to further engagement as the application progresses.

With our best wishes,
Darren


Clerk / Responsible Finance Officer

Treverbyn Parish Council
Parish Offices
Rockhill Business Park
Higher Bugle
St Austell
PL26 8RA
Telephone: 
Email: clerk@treverbynparishcouncil.gov.uk
Website: www.treverbynparishcouncil.gov.uk

***** PLEASE NOTE THE NEW PARISH COUNCIL EMAIL ADDRESS IS: clerk@treverbynparishcouncil.gov.uk *****

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From: Trelavour Lithium <trelavourlithium@planninginspectorate.gov.uk>
Sent: 24 June 2025 10:56

Subject: BC0310001 - The Trelavour Lithium Project - EIA Scoping and Consultation and Regulation 11 Notification

Dear Sir/ Madam

Please see attached correspondence on the proposed Trelavour Lithium Project.

The applicant for the proposed development intends to make an application for development consent under the Planning Act 2008. The applicant has sought a scoping opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the environmental statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the scoping opinion and is inviting you to submit comments by **22 July 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Laura



Laura Feekins-Bate
Senior EIA Advisor
Planning Inspectorate
T [REDACTED]



@PINSgov



Planning Inspectorate



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DPC:76616c646f72





UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: BC0310001
Our Ref: 92987

Ms Laura Feekins-Bate
Senior EIA Advisor
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol BS1 6PN

21st July 2025

Dear Sir/Madam,

Nationally Significant Infrastructure Project The Trelavour Lithium Project, PINS BC0310001 Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that

public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Yours faithfully,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

¹
<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>