



PLANNING SUPPORTING STATEMENT

**Vehicular access improvement works and change of use from an existing maintenance vehicular access to alternative primary quarry vehicular access onto
Gothers Road from Trelavour Quarry**

**Land at Trelavour Quarry, St. Dennis,
St. Austell, PL26 8DL**

10 October 2023

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1 Introduction

1.1 General

This Supporting Statement provides additional detail and justification to support the planning application for the proposed vehicular access improvement works and change of use from an existing maintenance vehicular access to alternative primary quarry vehicular access onto Gothers Road from Trelavour Quarry, at Trelavour Quarry, St Dennis, St Austell, PL26 8DL.

The proposed improvement works have been designed to enable an alternative primary vehicular access to Trelavour Quarry from Gothers Road to allow the ongoing and unrestricted access from the public highway to the quarry across Cornish Lithium controlled land. The quarry is also served via an approved primary access from the B3729 but requires the maintenance of third-party access agreements/wayleaves.

The alternative primary access will be used for all quarry related traffic required to allow the ongoing investigative works and fulfilment of requisite health and safety obligations as the site transitions from disused kaolin quarry to commercial lithium extraction site. It is not the current intention that the access will be used as the main haulage route for any commercial mining fleet, the details of which will be developed during the forthcoming Feasibility Study.

1.2 Company Overview

Cornish Lithium Plc. (“CL” or the “Company”) is incorporated and registered in England and Wales (company number 10205021), with a registered office at Tremough Innovation Centre, Penryn, Cornwall, and operational centres at United Downs, near Redruth and St Dennis, near St Austell.

CL is a highly innovative UK-based mineral exploration and development company whose projects are focussed on the responsible exploration and sustainable extraction of lithium. Deposits of this critical mineral are found in hard rock deposits and geothermal waters across the historical mining districts of Cornwall.

Given its role in batteries for electric cars and renewable energy systems, lithium is a key enabler of the UK’s transition to clean energy. A stable and domestic source of lithium and battery manufacturing supply chains are vital components of the future UK economy.

1.3 Project Overview

The Trelavour Hard Rock Lithium Project is operated by Cornish Lithium G5 Limited (company number 13088939), which is a wholly owned subsidiary of CL. The Company has secured the Trelavour Quarry site along with the nearby TreLith Processing Facility, a brownfield mineral processing site, which benefits from excellent logistics and existing infrastructure, including power, rail, road and access to port facilities.

In 2018 and 2019 CL began onsite surface exploration at its hard rock lithium project at Trelavour Downs near St Dennis. Project identification resulted from extensive research into historical records, and modern geological, geochemical, and geophysical datasets.

It is notable that lithium was successfully mined in the Trelavour Downs area during the second world war. This initial work identified the former Trelavour Downs kaolin pit as a high-priority site for exploration and development.

Initial drilling of the site in 2020 confirmed the presence of pervasive lithium mineralisation in the form of lithium bearing micas within the granite that were identified as amenable to extraction in initial laboratory metallurgical trials.

Lithium is proposed to be extracted from Trelavour ore via the initial concentration to a lithium mica concentrate followed by lithium extraction via a licenced process developed by Australian company Lepidico, to produce battery grade lithium hydroxide. Cornish Lithium has acquired an exclusive licence to use Lepidico's technology across the St Austell Granite.

Environmental surveys and studies have commenced to support the project's Feasibility Study together with a drilling programme designed to expand the Trelavour Mineral Resource and allow conversion from Inferred to a Measured and Indicated classification under the JORC Code.

Detailed engineering of a demonstration plant is underway and construction at the TreLith site is due to commence late 2023. This will validate the process flow sheet and will advance progress of the Company's plans to be in production in 2026.

2 Site Description

The Trelavour Quarry site is centred on National Grid Reference: SW 95831,57161 and is situated in the central area of the wider St Austell mining district.

The site is bounded by B-roads to the northwest and north, with Imerys Minerals Ltd owned and/or leased land surrounding the remainder of the site. The centre of St Dennis village is located approximately 500m downslope to the northeast, with the nearest dwelling to the proposed development site located approximately 140m to the north-northwest. The development location and wider quarry is situated wholly within the Parish of St Dennis.

Clusters of operational and non-operational quarries, waste tips and processing facilities lie near the site and dominate the landscape character of the area.

3 Development Description

The proposed development will consist of engineering works to improve the existing access arrangement which has been designed to enable the permanent and safe access to Trelavour Quarry.

In accordance with the geometry requirements set out within the Cornwall Council Development Layout Design Guide (June 2012), the new vehicular access onto Gothers Road has been designed to provide a 7.7 m carriageway width, with 10 m junction radii on either side.

The first 10 m of the access road will not exceed a 1:20 gradient and the access will comprise of a bound surface to ensure that no loose material will enter the public highway. A 1.5 m wide concrete rumble strip will be provided to ensure that any loose material is removed from vehicles departing the site before they adjoin Gothers Road.

The existing surface water drainage ditch that runs parallel to the highway will be culverted for the length of the redesigned junction bellmouth. Integration of drainage gully's and channel cut-off drains will be included to ensure appropriate management of surface waters from the site and highway.

Upgrades to security gating and fencing will be undertaken, with new access gates located appropriately distanced from the site entrance to allow the safe flow of traffic. A small mobile security office/gate cabin will also be placed inside the fence line to monitor site traffic for security and pre-site departure inspections.

Sympathetic revegetation of disturbed areas of ground in the vicinity of the access will be undertaken using native species where applicable. Visibility splays will be included within the wider site vegetation management plan to ensure vehicles using the entrance, and users of the highway, always have adequate sight of one another.

4 Planning History

In August 2007 Goonvean Ltd submitted a Scheme of Working, Site Access and Conditions to the Mineral Planning Authority (NR/07/00474/ROMPS) however, this scheme remains undetermined. The scheme identified that the site would remain as an active china clay producing pit, albeit on a small, intermittent scale.

With respect to site access the 2007 scheme stated: *'the majority of vehicular access to the site is from the Company's Rostowrack Operational Area 4B, using the B3279 road crossing and then via industry internal haul roads.'*

The scheme also referred to: *'a direct access point to the public highway which is to Gothers Road as shown on Drawing No. GN-TR-02A. (Access point V1). This is currently used for emergency access, to remove material fly tipped on our site and occasionally for maintenance work.'*

Cornish Lithium approached Cornwall Council's Principal Development Officer – Minerals and Waste, Mr Tim Warne, on the 4th May 2023 to establish if the proposal to use the Gothers Road access as a primary access point accords with the approved nature of development defined by the overarching ROMPS for the area (97/00965).

The response from Mr Tim Warne on the 18th May 2023 stated that the Council's Highways Officer noted the following after a consultation on the undetermined scheme in 2007: *'Section 6.3 of the Scheme of working confirms the majority of vehicular access to the site is from the Company's Rostowrack Operational Area 4B, using the B3279 road crossing and then via industry internal haul roads. This road crossing will be used in accordance with the conditions of planning application/decision notice R171(2) shown as Y on Plan GN-TR-02A. Section 6.3 of the Scheme of working, however, also acknowledges there is one direct access point to the public highway which is Gothers Road (shown as V1 on Drawing No. GN-TR-02A) currently used for emergency access, to remove material fly tipped on the site and occasionally for maintenance work, with the condition of the access being satisfactory for this use.'*

Do not consider the alignment, surfacing and drainage arrangements of Access Point V1 to be acceptable for anything more than the above-stated Section 6.3 uses'.

Based on this response, whilst also recognising the scheme was undetermined, it was concluded that use of the existing Gothers Road access as a primary access point did not accord with the approved nature of development defined by the overarching ROMPS for the area and a formal application would be required.

5 Benefits and Justification

As outlined in Section 1.1, the primary justification for the proposed development is to satisfactorily allow the ongoing and unrestricted access from the public highway to the quarry across Cornish Lithium controlled land. The quarry's is also served via an approved primary access from the B3729 but requires the maintenance of third-party access agreements/wayleaves.

Anticipated benefits include:

- Full control over access within current operational boundary providing management autonomy.
- Ability to progress requisite investigations to enable the timely completion of the project Feasibility Study to continue unrestricted.
- Allow ongoing management of the site in accordance with the Quarries Regulations 1999.
- Lower combined ecological impact as the access improvements proposed utilise an already existing and recognised access location.
- Improved security and reduction of health and safety risks in and around the Trelavour site.

6 Community Consultation and Engagement

6.1 St Dennis Parish Council

Trelavour Quarry lies within the St Dennis Parish boundary. Representatives of CL presented the proposed development at a community update meeting on the 20 September 2023 and the parish council were updated during a full council meeting on 3 October 2023; an extract of the minutes is viewable on the St Dennis Parish website¹.

6.2 Mineral Planning Authority (MPA)

An outline of the proposal was provided to the MPA by email, via Principal Development Officer – Minerals and Waste, Mr Tim Warne. Mr Warne responded by email on the 18 May 2023 with an informative regarding suggested supporting documentation and proposal for the development working title.

Mr Warne was also provided a draft copy of the supporting statement on 22 September 2023, with a response received 3 October 2023 providing agreement to the application working title and additional recommendations with respect to vehicle frequency and clarity of existing conditions.

¹ <https://www.stdennisparishcouncil.org.uk/>

7 Supporting Technical Studies

7.1 Access Appraisal

Advance Consulting Engineers Ltd (ACE) completed the required highways assessments to support the application, including an Access Appraisal (AA) and Road Safety Audit (RSA), both of which are provided separately in the supporting documents.

The AA concludes:

‘... this AA provides the LPA & LHA (CC) with the reassurance that safe and suitable access can be achieved at the site and why there would be no material highways matters that would preclude a new construction access point onto Gothers Road from being approved on highways grounds, in accordance with ‘Policy 27: Transport and accessibility’ of the Cornwall Local Plan and Paragraphs. 104, 110, 111 & 113 of the NPPF: - “Safe and suitable access to the site can be achieved for all users.’

The RSA identified one problem regarding the site access, this being that the ‘visibility right is effected by the combination of vertical alignment and roadside embankment.’ The recommendation that the nearside verge is reprofiled to ensure appropriate visibility will be completed as part of the proposed works.

7.2 Site Traffic

The access will predominantly be used by light 4x4 vehicles during typical operational hours between 0700 to 1900 Monday to Friday and 0700 to 1300 Saturday, expect during emergencies, with occasional movements of HGVs such as tractors with trailers and haulage vehicles. As the quarry is currently non-operational, access vehicle frequency will fluctuate, with periods of minimal usage expected. Anticipated access usage frequency by vehicle type is outlined in Table 1.

Table 1: Anticipated vehicle usage frequency of the Gothers Road quarry access point. Frequency values are two-way, i.e., one count for entering and one for exiting the site from the access.

Vehicle Type	Daily	Weekly	Yearly
Light 4x4 (e.g., Isuzu D-Max)	10	50	1,300
Articulated HGV with four axles (e.g., tractor and twin axle trailer)	4	17	220
Rigid HGV with four or more axles (e.g., aggregate tipper)	-	-	12
Articulated HGV with six or more axles (e.g., low loader to mobilise heavy plant)	-	-	8
Total	14	67	1,540
HGV Frequency during bulk sample campaigns only[†]			
Articulated HGV with four axles (e.g., tractor and 10 tonne capacity twin axle trailer)	14	56	168
Articulated HGV with six or more axles (e.g., low loader to mobilise heavy plant)	-	-	8
Total	14	56	176

†Bulk Sample Campaigns: Cornish Lithium’s Lepidico demonstration processing plant at the company’s TreLith Processing Facility will require a bulk sample of approximately 800 tonnes of freshly extracted granite during 2024/25. Quarried material will be supplied and transported from Trelavour Quarry on a campaign basis, with a total of three campaigns currently planned. Haulage from the quarry to TreLith will be via a tractor with twin axle tipping trailer (articulated HGV with four axles). Campaigns will be short duration, typically no longer than four days, assuming seven loads from the quarry daily. Utilising campaigns will minimise the impact and enable tighter management control of multi-site activities.

The majority of traffic, especially HGV, will approach and depart the site from the junction with Hendra Road/B3279 and Gothers Road, therefore not interfering with the Gothers Road and Trelavour Road junction that services the village, bus stop, or pedestrian access to the Trelavour Downs permissive path.

There is currently insufficient resolution on the frequency or types of vehicles that would be expected during active quarrying, details of which will be developed during the forthcoming Feasibility Study.

7.3 Preliminary Ecological Appraisal (PEA)

Cornwall Environmental Consultants Ltd (CEC) undertook a site wide ecological assessment of the land at Trelavour of the proposed development in April 2021. The assessment comprised a review of ecological features which may be impacted by the proposed works which included: designated sites, habitats and species of principle importance and protected species. The ecological assessments comprised three elements: a desk study, site surveys and a report.

The conclusions from the assessments for the proposed development area highlight:

- The habitat in the development location is dominated by scrub (A2) – dense/continuous, with most of the proposed redevelopment being constrained to areas of pre-existing hard standing.
- There are no recorded designated sites or priority habitats within the vicinity of the development area. The Trelavour Downs geological SSSI is located 530 m to the northeast, whilst several other designated sites recorded within the wider landscape.
- Ecologist target notes for the area identified a *‘Strip of well-established scrub and heathland (and bracken) along the north-western site boundary in a cohesive band. The scrub adjacent to the path contains more non-native invasive species than any other part of the site – with locally abundant montbretia and variegated yellow archangel.’* The path referred to in this assessment was a pre-existing track from the quarry to the Gothers Road access point. This track has since been widened and resurfaced with Type 1 803 aggregate and now forms a quarry access road. The cohesive band of scrub has been retained, with all widening and resurfacing works having been undertaken under the watching brief of an ecologist. The non-native invasives are under an ongoing control plan in order appropriately manage and enhance the habitat with the vicinity.
- The ecological enhancement opportunities section of the initial site wide PEA stated: *‘Enhancement measures are recommended under NPPF Chapter 11, Cornwall Local Plan Policy 23 (see Section 2.1.2) and the Cornwall Council Planning for Biodiversity Guide (2018). There is scope to enhance many of the existing habitats present on site. Much of the*

heathland and scrub is in poor or moderate condition and could both be enhanced towards good condition through measures to control invasive species (such as bracken and rhododendron) and improving the age-range and structure of the habitat. As mentioned in the previous point, CL has implemented a site wide invasive control plan with the intention to appropriately manage and enhance the applicable on-site habitats.

- Precautionary approaches to site clearance will be needed to minimise the risks of impacting on reptiles and nesting birds.

CL has employed an internal ecologist to provide oversight of all development activities and CEC has been retained as an independent Ecological Clerk of Works (ECoW) to ensure the impact of site clearance works is minimised.

7.4 Surface Water Drainage

CL's retained consultants Advance Consulting Engineers Ltd have completed the required surface water drainage assessments and design to support the application, including a proposed drainage plan, culvert sizing calculations and greenfield runoff estimation. Details of which are provided with the supporting documents.

The proposed development has been designed to ensure the existing perimeter drainage ditch that intercepts run-off from the upslope catchment remain operational. An uninterrupted drainage pathway will be provided by the inclusion of a culvert along the length of the proposed access bellmouth redesign and improvement works. Clearance and inspection of the culvert shall be incorporated into the wider site care and maintenance programme to ensure operability.

The access bellmouth has been designed with a final level gradient not exceeding 1:20 for the first 10 m, to ensure runoff from the bonded areas report to the twin road gullies at the lowest point, with the outfall reporting the existing permitter draining ditch.

The proposed concrete rumble strip situated in proximity to the new junction bellmouth will incorporate a heavy-duty channel drain to act as a cut off trench from gravel road to fully bonded surface.

The Environment Agency Flood Map indicates the proposed development site is located within an area of very low flood risk (<0.1%) from surface waters and/or rivers.

It is therefore concluded that there will be a negligible impact on the existing surface water drainage routes or flood risk within the vicinity because of the proposed works.

7.5 Historic Environment

Wessex Archaeology undertook a Historic Environment Desk Based Survey (HEDBA) in 2022, which highlighted no records of any Historic Environment Record (HER) structures or areas within or in the vicinity of the proposed development. No other features or structures were identified from a review of the available datasets, such as those from the Cornwall National Mapping Programme.

CL is committed to operating responsibly regarding the historic environment and has commissioned the development of an updated Chance Finds Protocol to ensure any unrecorded heritage assets

are managed appropriately. In the interim, CL will adopt the existing approved Archaeological Code of Practice developed by Cornwall Council and the China Clay Industry.

7.6 Environmental

All operations associated with the Trelavour Quarry, including the proposed works and ongoing use of the proposed development will comply with the existing environmental conditions detailed within the extant permissions, defined within the overarching ROMPS for the area (97/00965). The existing conditions relevant to the proposed Gothers Road application are provided in Appendix A.

8 Conclusion

The overriding justifications for the improved access and subsequent use as an alternative primary quarry access point will provide a demonstrable benefit to ongoing ability for CL to progress the Trelavour Lithium project to commercialisation and effectively manage Trelavour Quarry.

The access has been designed to current highway specifications and will be constructed of good quality materials and maintained to a high standard.

The mitigations outlined within the supporting documents will be followed during the requisite phases and compliance limits within the extant permissions will be adopted and enforced.

This statement and supporting documents identify that the development would not result in any adverse impacts that would significantly and demonstrably outweigh the benefits. It is therefore considered that planning permission should be granted.

**APPENIDX A - Relevant Approved Conditions from Application No.
97/00965**

Condition No.	Details
7. Access and Highway Matter (General)	The operator shall employ the best practicable means to prevent the transfer of mud, dust stones or other deleterious material onto the public highway.
8. Sheeting of Lorries	All heavy commercial vehicles leaving the site except those carrying single sized washed stone over 75mm shall be sheeted or have their loads otherwise totally enclosed before leaving the site (this condition shall not apply to vehicles travelling between one part of the site and another), unless otherwise agreed in writing with the MPA.
9. Environmental Protection (General)	All practicable means shall be employed by the operators for preventing or minimising the emission of dust, smoke or fumes and the creation of noise and vibration during the approved use of the site. Vehicles, plant and machinery operated within the site shall be maintained and fitted with silencers in accordance with the manufacture's specification at all times.
10. Dust (General)	A scheme for the suppression and mitigation of dust arising at the site which shall include proposals for dust monitoring, shall be submitted to the MPA for approval within 12 months (or such longer period as may be agreed with the MPA) of the determination of conditions by the MPA (see Appendix B).
11. Noise (General)	Except as may be provided for in Site Specific Conditions approved for the Operational Areas and for the Long-term Working Areas or as may be specified in original conditions in permission granted after 1 January 1993, noise levels arising from the Mining, Restoration or Aftercare Operations on the Site, measured at any occupied residential property, shall not exceed 55 dB (LAeq) one hour freefield between 7.00 and 19.00 hours and 45dB (LAeq) 5 minutes freefield between 19.00 and 07.00 hours, unless otherwise agreed in writing with the MPA.
15. Ground and Surface Water Protection (bundling and storage facilities)	Any oil, fuel, lubricant and other potential pollutants shall be handled on the site in such a manner as to prevent pollution of any watercourse. For any liquid other than water this shall include storage in suitable tanks and containers which shall be housed in an area surrounded by a bund wall of sufficient height and construction so as to contain 110% of the total contents of all containers and associated pipework. The floors and walls of the bunded area shall be impervious to both water and oil, and vent pipes should be directed downwards into the bunded area.
16. Protection of Controlled Waters	All surface runoff from tips or areas prepared for extraction or tipping shall be intercepted by perimeter ditches and/or contained in settlement lagoons before discharge to any controlled waters. All tips shall be treated as soon as reasonably practicable to prevent the runoff of waste materials
17. Lights and Floodlighting (General)	All practicable means shall be employed by the operators to minimise any adverse effects of lights and floodlights upon adjoining residential properties and to negate any resulting dazzle onto the public highway.

APPENIDX B - The Scheme Pursuant to Condition 10 (Ref. NR/09/00206/PS21) Approved via Email Dated 17 July 2009.

ST AUSTELL CHINA CLAY AREA (ROMP'S) DECISION NO. 97/00965 CONDITION 10: DUST

For installations and processes which require a permit in accordance with the Pollution Prevention and Control Act 1999 and the Pollution Prevention and Control Regulations 2000 (as amended) the conditions of the permit, including those for the operational controls for the suppression and mitigation of dust and for the monitoring and measuring of emissions, shall apply. The geographical area to which each permit applies is shown within the permit.

For all other areas the following scheme will be implemented.

Suppression and Mitigation

1. Within each Operational Area, as identified on Drawing No G4/1/502, the following dust suppression measures shall apply in order to minimise the escape of dust from the Operational Area: -
 - a) In periods of dry and/or windy conditions or when such conditions are forecast by the Meteorological office (or other reputable forecaster), exposed haul road surfaces, stockpiles and other exposures of sand shall be maintained in a sufficiently damp condition;
 - b) All unutilised exposed ground capable of generating wind blown dust shall be seeded at the first available opportunity, in order to establish permanent vegetation on exposed surfaces.
 - c) Commensurate with good engineering practice, the surface areas of mica dams shall be flooded and/or dampened by water sprinkler systems; the level of stored water and the location of sprinklers shall be targeted at areas of the beach known to be suspect to dust blow.
2. No internal quarry vehicles (dozers, dumpers, loading machines, graders) shall be deployed with engine exhaust systems pointing in a downward direction.

Monitoring

3. Visual assessments of dust emissions shall be undertaken at least once per day whilst operations are being carried out on the site. The assessment shall be carried out at a point(s) from which the potential sources of emissions are clearly visible. Adverse results shall be investigated immediately and the operator shall ensure that the cause has been identified and corrective action taken.