

Mrs A Christine Self
Programme Officer
Homefield House
Homefield Roa
Saltford
Bristol
BS31 3EG

Direct Dial: 020 7650 1248

Email: [REDACTED]

Your Ref:

Our Ref: JBB/JBB/00175471/1

Date: 21 September 2018

By Email & Post: [REDACTED]

Dear Madam,

**Bournemouth, Dorset & Poole Mineral Sites Plan Examination ("the MSP") –
Supplemental Submission of Frome Residents Against Mineral Extraction**

We act for Frome Residents Against Mineral Extraction (FRAME).

Our clients wish to register this brief further submission on a discrete but important procedural issue that has recently arisen. Specifically, our clients make this submission in response to the Inspector's Question 7: *Were all relevant community groups provided with an adequate opportunity to comment on all aspects of the MSP?*

FRAME's unequivocal response to this question is 'No'.

On 19 September, Dorset County Council published further Heritage Assessments for Station Road and Hurst Farm on its website (references: MSDCC73 and MSDCC74). The late publication of these reports comes some 11 days after the closing deadline for submissions to the Examination and a mere 3 clear working days before the Examination is due to start.

Our client's heritage expert Dr Simon Collcutt, advises that the reports contain new and complex information which, without detailed consideration and response, may be highly prejudicial to FRAME's case. Dr Collcutt advises that there is insufficient time for him to fully consider and respond to the new material within the timeframe

Leigh Day

London office: Priory House, 25 St John's Lane, London EC1M 4LB
DX 53326 Clerkenwell

T [REDACTED]
F [REDACTED]

E [REDACTED]
W www.leighday.co.uk

Manchester office: Central Park, Northampton Road, Manchester M40 5BP

A list of partners can be inspected at our registered office or website. Leigh Day is a partnership authorised and regulated by the Solicitors Regulation Authority (SRA). The firm's SRA numbers are 00067679 (London) and 000614420 (Manchester).
Service of documents by email will not be accepted.

Leigh Day

available. He has also expressed the opinion that he has not before experienced such a significantly prejudicial breach of protocol by an MPA.

This is against a background where our clients have continually run into difficulties obtaining relevant information from the Council to enable them to fully and fairly comment on all aspects of the MSP. For example the Council received (approximately June 2017) a professional response from the Purbeck District Conservation Officer in but did not disclose its existence until challenged by FRAME and did not actually release it (26/1/2018) until FRAME stated that they were about to submit a formal Freedom of Information request.

Our client strongly objects to the inclusion of this new evidence and invites the Inspector to give careful consideration to its admissibility and weight in light of this clear breach of natural justice and procedural propriety. In the alternative, our client asks that the inspector give serious consideration to these matters in the context of Question 7.

Counsel for our clients will address this matter further at the Examination should that prove necessary.

Yours faithfully,


Leigh Day