

**DORSET COUNTY COUNCIL, BOURNEMOUTH BOROUGH COUNCIL
AND BOROUGH OF POOLE MINERAL SITES PLAN ("the MSP")**

**HEARING STATEMENT on behalf of
FROME RESIDENTS AGAINST MINERAL EXTRACTION
On the subject of: HABITATS REGULATIONS ASSESSMENT**

RESPONSE TO INSPECTOR'S QUESTIONS

Habitats Regulations

Questions 15 - 20

1. FRAME's position on the November 2017 HRA is set out in its previous representations. In light of the imminent publication of the new HRA, those submissions are relied on until such publication but not repeated here. A revised Hearing Statement in respect of these questions will be submitted after receipt of the new HRA.
2. For the avoidance of doubt, FRAME reiterate the headline points raised in the earlier representations, namely:
 - (a) the inappropriate reliance on the wording in policy MS-1 where the HRA has not ruled out effects on European sites;
 - (b) the failure to apply the precautionary principle;
 - (c) the presence of a conflict pathway with the River Frome SSSI; and
 - (d) the non-compliance of the "backloading" approach with the Conservation of Habitats and Species Regulations 2017.
3. See FRAME's earlier representations:
 - (a) October 2015 at [B1.1 - B.1.1.12]; and

- (b) January 2018 at pages 1 - 3 of the representation on AS6, at pages 1, 2 and 6 of the representation on AS-25, and at pages 1 -3 on AS-19.