

**IN THE WILTSHIRE AND SWINDON CORONERS COURT  
BEFORE THE RIGHT HONOURABLE THE BARONESS HALLETT DBE  
IN THE MATTER OF THE INQUEST TOUCHING THE DEATH OF DAWN STURGESS**

---

**SUBMISSIONS ON BEHALF OF WILTSHIRE COUNCIL  
FOR THE PRE-INQUEST HEARING ON 17 DECEMBER 2021**

---

**Introductory**

1. In written submissions dated 1 December 2021 Counsel to the Inquest (CTI) has identified the following issues as matters to be considered at the Pre-Inquest Review Hearing (PIR) on 17 December 2021.

Establishment of Public Inquiry

- a) Suspension of the Inquest:
- b) Designation of Core participants.
- c) Funding Applications
- d) Further Undertakings.

Further Procedural matters

- a) Requests for disclosure
- b) Requests for witness Evidence.
- c) Disclosure update.
- e) Scope/Terms of Reference.
- f) Restriction Order/Restriction Notice

Substantive hearings / venue / timings

2. Wiltshire Council advances the following submissions in response to those issues.

**Establishment of Public Inquiry** (paragraphs 10 to 14 of CTI's submissions)

3. Wiltshire Council notes the decision by the Home Secretary and the Coroner's intention that the substantive inquiry hearings commence in late February 2023 and that for the formal setting up of the inquiry a first hearing date is proposed for 24 February 2022.
4. Wiltshire Council has no submissions to make.

Suspension of Inquest: (paragraph 16 of CTI's submissions)

5. By way of update Wiltshire Council confirms that the Proper Officer for the Wiltshire Coroner's Office has written to the Chief Coroner's Office seeking Central Government funding for the Inquest costs due to the national interest issues involved and to avoid the costs of the Inquest falling disproportionately on the residents of Wiltshire.
6. To date Wiltshire Council has not received a substantive response to this request.
7. Wiltshire Council understands that the suspension of the inquest will also suspend any further costs of the investigation falling on the residents of Wiltshire and therefore would support such suspension.

Designation of Core participants: (paragraphs 17 & 18 of CTI's submissions)

8. Wiltshire Council would agree to its inclusion as a core participant ("CP") and has no other submissions to make in this regard.

Funding Applications (paragraphs 19 & 20 of CTI's submissions)

9. Wiltshire Council notes CTI's comments and is currently considering its position in this regard.

Further Undertakings (paragraph 21 of CTI's submissions)

10. Wiltshire Council notes the details set out in Counsel for the Inquests submissions and awaits inquiry specific undertakings. It has no submissions to make.

**Further Procedural matters**

Requests for Disclosure (paragraph 23 of CTI's submissions)

11. Wiltshire Council has no submissions to make.

Requests for Witness Statements (paragraphs 24 & 25 of CTI's submissions)

12. Wiltshire Council has no submissions to make.

Disclosure Update (paragraphs 26 to 28 of CTI's submissions)

13. Wiltshire Council is continuing to provide disclosure to the Inquest Legal Team. Due to the limited resources available to the Council sufficiently experienced and knowledgeable to undertake the disclosure work and the effect and additional demand

that the on-going pandemic is having on those officers means that disclosure is taking longer than originally anticipated.

14. Wiltshire Council is liaising with the Government legal team as to the best way to deal with any sensitive information which may be within Council control.

15. Wiltshire Council hopes to have completed disclosure early in the new year.

Scope/Terms of Reference: (paragraphs 29 to 31 of CTI's submissions).

16. Wiltshire Council has no comments to make.

Restriction Order/Restriction notice: (paragraphs 32 and 33 of CTI's submissions)

17. Wiltshire Council has no comments to make.

**Substantive hearings – venue/timing**

18. Wiltshire Council notes the submissions as to venue and timings and has no comments to make.

FRANK CAIN  
Head of Legal Services  
Wiltshire Council

10 December 2021