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Dear Sir/Madam

**Planning Appeal in relation to Land at The Old Piggery, Firgrove Lane, North Boarhunt, Hampshire.**

**Appeal against Enforcement Notice 02**

**Reasons for requesting a Public Inquiry**

The reason for requesting a public inquiry is because the Council is currently carrying out a new Gypsy and Traveller Accommodation Assessment, due to be published shortly, that will show that the occupiers of this area of the site are gypsies/travellers that were not counted as such in the previous Gypsy and Traveller Accommodation Assessment. The reason they were not counted is because the occupiers had no reason to cooperate with the assessors at that time and the implications of non-cooperation were not fully explained to them i.e an artificially reduced 'need' figure for gypsy and traveller sites, and corresponding enforcement action against the site. A public inquiry would establish both the need for additional gypsy/travellers sites and that there are no other authorised gypsy/traveller sites for the occupiers to move to.

The LPA has also questioned the gypsy/traveller status of the occupiers and omitted to take account of the fact that there are children living on the site enrolled in local schools whose education would be severely disrupted if forcibly removed. A public inquiry is required to demonstrate, without doubt, that each of the relevant occupiers are gypsies/travellers and the fact that many have children enrolled in local schools.

Examination is also required to demonstrate that the required balancing exercise relating to the occupiers' Human Rights has not been properly carried out and that the LPA has not taken appropriate account of the Public Sector Equality Duty or the best interests of the children living on the site. Cross examination is required in order to demonstrate this clearly.

As such only a public inquiry is sufficient to prove the status of the occupiers, the need for sites, the fact that there are no other sites for the occupiers to move to, that the occupant's human rights would be breached, that the public sector equality duty would also be breached and that no account has been taken of the best interests of the children living on the site.

Yours faithfully



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