

Mid Sussex District Council Oaklands Oaklands Road Haywards Heath West Sussex RH16 1SS

Our ref: PDH/COS

15 July 2024

Dear Sir/Madam

RE: Public Spaces Protection Order - Saint Hill Road, East Grinstead

I write on behalf of Church of Scientology Religious Education College Inc of Saint Hill Manor, Saint Hill Road, East Grinstead ("the Church").

Following a review of the welfare and safety of members of the Church and other visitors to the Church properties on Saint Hill Road in East Grinstead, my client requests that the Council make an Order under section 59 of the Anti-Social Behaviour, Crime and Policing Act 2014, namely a Public Spaces Protection Order ("PSPO").

A copy of the requested Order is attached hereto. The map attached to that draft Order shows the proposed PSPO area outlined in red.

The reason the order is needed and that it how meets the conditions is set out in the draft order itself.

The relevant background to this matter is as follows:

The Church owns and occupies the land to the south of the proposed PSPO area, extending from the East Grinstead Sports Club on Saint Hill Road to Deers Leap Park just beyond Saint Hill Green on West Hoathly Road.

The national speed limit (60mph) applies to Saint Hill Road and there are no pavements.

The Church of Scientology has been present on Saint Hill Road since 1959, when its founder, L. Ron Hubbard, first purchased Saint Hill Manor. The most significant Scientology church in England, known as Saint Hill Castle, was built on the grounds in the late 1960s, and has been considerably expanded since that time. Today the property is the church of local Scientologists, as well as being a church attended by many Scientologists nationally and internationally,

42-44 COPTHORNE ROAD FELBRIDGE EAST GRINSTEAD WEST SUSSEX RH19 2NS T: 01342 325765 F: 01342 325479 E: office@hodkin.org W: www.hodkin.org



because of its importance in the Scientology religion. It also has many non-Scientologist visitors. In a normal week hundreds of people attend this property for religious and other activities. At certain times of the year, the Church hosts large community events on the property—including at Easter, Christmas, Bonfire Night, Spring and Summer events—which are attended by many thousands of general public from the local area. Special Scientology events are also held several times a year—including at the New Year, the Founder's Birthday, other important anniversaries and, usually in October (although last year at the start of November), the International Association of Scientologists event which is attended by local Scientologists as well as thousands of others from around the world.

In recent years a few anti-Scientologists have demonstrated outside of the property, on Saint Hill Road, where the main entrance to the Church is situated, and, to a lesser extent, on West Hoathly Road, where there is another entrance used only by staff. These have normally been targeted at the special Scientology events, in particular, the International Association of Scientology ("IAS") event held on a Friday evening in October, which is followed by a weekend of other related events.

Followers of the Scientology religion have in years past been subjected to fairly extreme discrimination in this country. This was brought to an end by a ruling of the Supreme Court in 2013. The Supreme Court found that Scientology was a religion and described earlier treatment of Scientologists as "illogical, discriminatory and unjust". As a result of that ruling all Scientology churches in England were registered as places of meeting for religious worship. On this property, Saint Hill Castle is a registered place of meeting for religious worship, together with a separate smaller chapel.

Although the Scientology religion has experienced very few problems in comparison to other religions, it has nevertheless attracted its own small clique of dedicated detractors. Whilst recognizing everyone's right to express opinions and to demonstrate, this has to be done in such a fashion so as to respect the rights of others, avoid hate speech, and maintain public safety. The manner in which demonstrations have occurred outside of the Church on Saint Hill Road has not respected the rights of others, not avoided hate speech and has threatened public safety.

Under the Anti-Social Behaviour, Crime and Policing Act 2014, section 59, a local authority may make a public spaces protection order if satisfied on reasonable grounds that two conditions are met.

The first condition is that - (a) activities carried on in a public place within the authority's area have had a detrimental effect on the quality of life of those in the locality, or (b) it is likely that activities will be carried on in a public place within that area and that they will have such an effect.

For the reasons given above, and described in more detail below, both of these alternatives are satisfied in this case. The activities of the anti-Scientologist demonstrators on the road outside of the Scientology Church in East Grinstead have had a detrimental effect on the quality of life of those in the locality, and, it is likely that similar activities will be carried on in the same public place in the future and that they will have a similar detrimental effect on the quality of life of those in the locality.

The second condition is that the effect, or likely effect, of the activities - (a) is, or is likely to be, of a persistent or continuing nature, (b) is, or is likely to be, such as to make the activities unreasonable, and (c) justifies the restrictions imposed by the notice.

In this case, these demonstrations have occurred in the past and the demonstrators have indicated that they plan to repeat them in the future. The activities, as they have occurred, are unreasonable, because they have not respected the rights of others, not avoided hate speech and have threatened public safety. The effect of the activities does justify the restrictions imposed by the notice. The Public Spaces Protection Order sought strikes the right balance between allowing people to demonstrate and express opinions while protecting the rights of others and maintaining public safety.

The effect of the PSPO proposed is to prohibit the demonstrators from conducting their activities on the public highway immediately outside of the Church.

My client asks that this is put in place before this year's IAS event weekend in October. They wish to avoid a repeat of the disturbing and dangerous activities of 2023, described below.

Last year somewhere in the region of 30 demonstrators demonstrated immediately outside the main entrance to the Church on the public highway on the Friday afternoon and evening. A smaller number also returned on the Saturday and Sunday. Prior to their arrival, in agreement with the police and following consultation with the Council, an area of land next to the road and near to the Church property had been set aside for the demonstrators to hold their demonstration. Appropriate barriers were set up to protect them from stepping into passing traffic. However, the demonstrators refused to use the designated area, and instead positioned themselves on the road and verge immediately next to the main entrance. They held a number of anti-Scientology placards and shouted and chanted anti-Scientology slogans. Chief amongst their chants was one calling for the eradication of Scientology.

As a result all vehicles coming along Saint Hill Road had to exercise enormous care. The demonstrators sometimes stood out in front of vehicles turning into the entrance, shouting through windows and filming the occupants. The organiser of the event recorded and live streamed the demonstration on the internet, so that the harassment and attempted public humiliation of visitors to the Church could be admired by all of their supporters elsewhere.

The organiser of the demonstration had given assurances beforehand that they would do nothing to disturb the activities taking place on the property. This was a false assurance. Not only did they attempt to be as loud as possible to do just that, but on the Sunday one of the activities consisted of the opening of a new building close to the West Hoathly Road. The organiser attempted to disrupt this opening by screaming at the top of his voice from the road at the hundreds of Scientologists who had gathered there for that opening. And he recorded and livestreamed this on the internet, continually boasting about the disturbance he considered he was creating.

The Church received numerous complaints from visitors about the demonstrators. I asked for a number to be put in writing, and I am providing these with this letter. Local people repeatedly complained about being subject to abuse and having the safety of themselves, and sometimes their children, being put at risk by the demonstrators.

It may be noted that the number of visitors to the event meant that not all of their cars could be accommodated on the Church property. East Grinstead Rugby Club, which is situated on the other side of the road a small distance down from the Church's main entrance, kindly allowed overflow parking in their car park. This was in particular used by local Scientologists who tended to arrive later for the evening event than those that had come from further afield. These visitors, and their children, were forced to walk past the demonstrators on the road in semi darkness and put up with a barrage of abuse while being filmed. A number of the statements enclosed describe this experience, and how they felt abused and unsafe.

We wish to avoid this ever being repeated. The PSPO is a proportionate and reasonable way of achieving this.

The making of this order is also supported by the immediate neighbours on Saint Hill Road, namely the Rockwood Park Residents Association, the East Grinstead Rugby Club and the East Grinstead Sports Club. I enclose a letter from each of these confirming their agreement to the making of the PSPO.

I therefore request, on behalf of the Church and people in this locality, that the attached order be made.

If further information is required, or if anyone wishes to inspect the site themselves, please let me know.

Yours sincerely

Peter Hodkin Solicitor

The Public Spaces Protection Order (Mid Sussex District Council) 2024

Mid Sussex District Council ("the Authority) has made the following Public Spaces Protection Order under chapter 2 section 59 to 75 of the Anti-Social Behaviour, Crime and Policing Act 2014 ("the Act").

- 1. The Authority being satisfied that demonstrations and protests on the public highway and verge immediately outside of the Church of Scientology properties on Saint Hill Road and West Hoathly Road in East Grinstead have a detrimental effect on the quality of life of those in the locality, presenting both a risk to public safety and causing harassment, disturbance and alarm to those attending the Church of Scientology, and that such activities have had and will have such effect, and further that the effect is or is likely to be of a continuing nature such as to make such activities unreasonable and justify the restrictions imposed by this order.
- 2. The Authority is accordingly satisfied that the conditions set out in section 59(2) and (3) of the Anti-Social Behaviour, Crime and Policing Act 2014 have been met.
- 3. In making this Order, Mid Sussex District Council has had particular regard to the rights and freedoms set out in the European Convention on Human Rights, including the need to ensure that the restrictions imposed are proportionate. The Council considers that the restrictions are justified and proportionate in light of the unreasonable detrimental effect on the local community of the activities prohibited.
- 4. This Order applies to the public highway and public land adjoining the public highway on Saint Hill Road and West Hoathly Road in East Grinstead, West Sussex, the location of which is shown edged red on the attached Plan ("the PSPO Area").
- 5. The Authority, in exercise of its powers under section 59 of the Anti-Social Behaviour, Crime and Policing Act 2014, hereby prohibits, until the date 3 years from date of this Order or until this Order is discharged by the Council, whichever is earlier, any person from engaging in any demonstration, protest, vigil or similar activity on the PSPO area.
- 6. It is an offence for a person, without reasonable excuse, to engage in any activity that is prohibited by this Order. A person found to be in breach of this Order shall be liable on summary conviction to a fine not exceeding level 3 on the standard scale.

Defined terms:

Public highway - any highway or road to which the public has access and includes pavements, verges and other land adjacent to that highway.

Demonstration - includes any assembly, gathering or procession in a public place to demonstrate support for or opposition to any person, cause or organisation.

Protest - similar to a demonstration but may involve fewer people.

Vigit - a period of keeping watch, especially at night.

EXECUTED AS A DEED by affixing

THE COMMON SEAL of

MID SUSSEX DISTRICT COUNCIL

This day of

2024

In the presence of

Authorised Officer:



PSPO Area

Complaint regarding the demonstrators outside IAS event, November 2023



Mon 19/02/2024 10:17

Dear Sir or Madam,

When I attended the event in November 2023 there was a very large group of demonstrators outside the gates. They were yelling at everyone who passed by. When I walked by one man yelled directly at me, as did multiple other people in their group. It was obviously designed to be intimidating. There were children with me and the behaviour of the demonstrators upset them. They were very loud, and borderline abusive. Their attitude and behaviour did make me concerned for my safety as they also took up a lot of space, forcing people to walk in front of vehicles to avoid them, they did seem to be moving physically toward people so as to create further intimidation.

Regards,

Sent from my iPhone

Dear Sir,

On November 3rd & 4th, when driving visitors to Saint Hill for the annual IAS event, I noticed that some people were calling out visitors coming in, disturbing them and trying to block the entrance. Their behavior was far from friendly and made some visitors scared. This situation should be resolved and visitors should be able to come to the Church in peace.



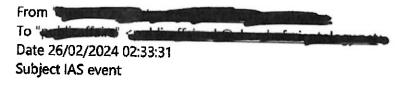
I am writing to you about our yearly IAS weekend (3rd 50 5th November 2023) as the presence and conduct of demonstrators/picketers at the front gates of our Church was offensive, intimidating and caused the visitors coming to the event from all ove the world to be fearful and/or anxious about the safety of themselves and their families.

Some picketers were harassive, putting their heads through car windows, blocking traffic, upsetting and distracting drivers and shouting at us, the attendees.

This is unacceptable behavior and I hope this will get looked at and applicable actions be taken.

With best regards,

Attendee of the event 13 February 2024



To who it may concern.

As a guest of the event and as an owner of many of the properties across the road from Saint Hill I found the protesters present at the recent event in November offensive, rude and unpleasant.

I watched them call the security stationed at the front gate (not Scientologists) names and be make fun of their weight and other physical characteristics.

I feel their presence causes a concern to safety to drivers and pedestrians in relation to the small country road they are on.

Best,

East Grinstead resident and local business owner.

To Joseph Subject November 2023 IAS weekend

To whom it may concern,

I believe a complaint should be raised regarding the anti-Scientology demonstrators who were at the church entrances over the 3-day IAS celebration weekend.

Over the course of the long weekend I made many visits to my church, the first of which was with my children age 9 and 14. As we approached Saint Hill we were met by a large group of protesters several of whom filmed me and my children as close as they could get to our car. Whether their purpose was only to intimidate or for more nefarious reasons I don't know but they certainly were intimidating and far too close to us.

Yours faithfully,



To 'Company To 'Co

To whom it may concern:

I have been meaning to write a complaint for a little while, about the people protesting at our last annual IAS gathering in November at Saint Hill.

There were a number of people lining the street right before the entrance to Saint Hill and their behaviour was definitely offensive. While I would be the first to ensure their right to their own opinion, I fail to see how this entitles them to shout offensive comments at people coming to enjoy festivities at their spiritual headquarters and the former home of their religion's founder.

Their protests were not aimed at informing or raising (what they considered) valid issues, but they just wanted to annoy and cause a disruption. They were less protesting but just trying to be the biggest provocation they could be. I would ask that next time these protesters be assigned another location by the authorities, where they do not block traffic, do not cause distractions to drivers and won't come across as just spoiling for a fight.

Scientologists are generally a peaceful bunch, but that does not mean that we should let people walk all over us. In the interest of all, a different location seems appropriate.

Sincerely,



03/03/2024

Subject:

Complaint regarding the IAS event night protesters

From:

Sent:

03/03/2024 17:03:07

To:

I walked past the protesters on the night of the event with my 11 years old son.

The protesters showed aggressive behavior, shouing at me that I was abusing my son. That I was brainwashing him. They knew absolutely nothing about me, and these accusations were clearly hate speech.

They shouted other unpleasant and abusive things, I can't remember now, as i tried to pass them quickly, as their behavior was intimidating. Especially for a child who was with me. These were not a peaceful protesters, they were aggressive and hostile.

This is true

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Hello I would like to register a complaint about the demonstrators outside St Hill during the IAS event. I went there by car with my daughter who was driving and I was in the front passenger seat. My 13-year granddaughter and her 2 friends of the same age were on the back seats. As we were arriving close to the gate saw me. He started telling and banging hard and loud on the window on my side. We got startled and my granddaughter started asking what that was all about. We reassured the girls but it did have an effect on them ie it was a bit scary to them. Am glad we didn't have younger children with us

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26/02/2024

Subject:

Offensive picketing at IAS event

From: Sent:

25/02/2024 19:56:46

To:

Hello OSA,

We were stuck on the B2110 trying to turn into the St Hill road whilst the demonstrators must have been outside St Hill. It was a dangerous place to be stuck and many cars had difficulty as the cross road was almost gridlocked for at least 20 minutes that we were there. I saw a few near accidents as people tried to turn around or get past the traffic or simply came round the corners too fast and did know there was a traffic jam. There is simply not enough room on dark and narrow roads for the antics of a few disaffected people and the local council should know this.



05/03/2024

Subject: Harassment at the gates of The Church of Scientology East Grinstead in November

2023

From:

Sent: 05/03/

To:

05/03/2024 17:45:29

To Legal Director Office of Special Affairs.

In November 2023, I with my family, were invited to the Annual IAS weekend celebrations. We get invited each year and tend to go as it is an excellent experience. Each year we have to run the gauntlet of a small number of protesters outside with their placards. I have had to prepare my children for this experience over the years. Letting them know in advance that it could happen that they will be shouted at for going into the Church grounds. I make sure they don't have their windows down and I ask them not to make any eye contact with the protesters. I make sure we won't be photographed and have our images posted on Social Media or private groups like we are some sort of criminals. Having been raised in Northern Ireland and experienced physical attacks because of my religious beliefs I had hoped for a better experience for my children. They should not have to cower in any way. No one should.



28/02/2024

Subject:

IAS weekend

From:

May Color Street Street Street

Sent:

27/02/2024 22:44:17

To:

"Allow affections and the second seco

Hi,

I wanted to let you know the experience I had with the protesters on the road outside St Hill.

I had come to the event with my husband and two children (aged 7 and 11). We had crossed the road from Rockwood park and the protesters had strange posters and were shouting out horrible remarks. I felt completely intimated and fearful. Both my children were scared and were clinging on to me for protection.

They were recording us walking into St Hill. I felt this was totally unacceptable to be recording my two young girls.

This was not a pleasant experience.

Regards,

Attn.

Dear Sir,

On November 3rd, I drove to the Church of Scientology at Saint Hill for the annual IAS event. When I arrived, I saw some picketers on the side of the road, just next to the entrance. I was surprised to see some aggressive behaviour from these people disturbing the flow of cars and people on foot entering the Church's ground. Some of my friends got scared and did not feel safe. This is unacceptable.

Kind regards,

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19/02/2024

Subject:

Protest at the IAS event in November 2023

From:

Sent:

19/02/2024 08:32:27

To:

Good day

I would like to give some feedback on the protest at the IAS event at Saint Hill in November 2023. I cannot believe that such an amazing celebration should be disrupted by people who do not know anything about what we do and what we are celebrating.

I am sure this would not be allowed in front of a church, temple, or place of worship. This is our church so why should we experience this sort of insult.

We have the right to our religious beliefs, and this must be contrary to everything that the British system stands for.

Best regards

Subject: Picketers

From:

MERCHANIST CONTRACTOR

Sent:

2/29/2024 12:12:44 PM

To:

To whom it may concern:

I am a Scientologist who lives in East Grinstead and I would like to make a formal complaint regarding the picketers who were protesting outside my church on Friday 3rd of November and Saturday 4th of November.

On both nights this was extremely distressing for me and my family as they were shouting at us and, staring into our car etc. I felt very intimidated and they upset my daughter very much.

I would like to see that these any picketers are barred from any of our events so that the stress that they caused me doesn't happen again.

Thank you,

Sent from my iPhone

20/02/2024

Subject:

Picketers at the IAS Anniversary event

From:

20/02/2024 20:25:25

Sent: To:

Dear Sirs.

I wanted to reach out to you concerning the disturbances caused by picketers outside Saint Hill during the IAS Anniversary weekend. Their presence not only created great delays in arriving on time for the event, holding up hundreds if not thousands of people, but their language was offensive, discriminatory and disturbing. My children were deeply upset by what was going on, during what should have been an enjoyable and celebratory evening.

The harassing nature of the picketers conduct had my taxi driver, myself and the other guests in our car genuinely fearful for our safety, particularly as some of them tried to distract the drivers which could have lead to serious accidents. I know I am not alone in this, and would ask if something can be looked into by the authorities.

Thank you very much for your time in considering this matter.

Kindest regards,



To security at Saint Hill.

I live across the road from Saint Hill have lived there for 30 years and have always felt safe and very privileged to live in such a lovely location next door to my Church. Nearly every day I go for a walk to the Rugby Club, Hockey Club or Saint Hill.

In November Saint Hill held the IAS Event, a large gathering of Scientologist standing for Freedom for mankind. I was happy to have some of my old friends visit me from the USA and to see so many old friends at Saint Hill. I am now nearly 90 years old and having friends come to Saint Hill is a joy for me.

This year I was greatly saddened by a group standing outside protesting at the mouth of the driveway to Saint Hill, I walked from my home to Saint Hill with a friend, my name was shouted by a protester and I felt anxious for both myself and my friend, having no idea what they may do next. The situation felt threatening and although I did my best to put my head down and walk past them I was worried about what would happen when I had to walk home later in the dark.

I live in the middle of the countryside church, in these times of equal rights and religious tolerance I am utterly bewildered why it is an infraction on human rights to be intolerant yet it is alright for a group of men to stand outside my church shouting and calling things out to the passers by, especially at an elderly lady such as myself.

Kinds regards,



Subject: St Hill IAS Event

From:

Sent: 2/14/2024 8:15:32 AM

To:

Dear Sir/Madam

I am sending you this email in regards to the picketers around the front of St Hill entrance and other entrances over the weekend of the charity ball and concert on 3rd to the 5th November 2023.

My unfortunate experience, as with I believe many others was very much pure harassment upon entering the grounds on the Friday early evening, although the many people entering were looking to be very excited in having our wonderful event once again, there was a very hostile and I must say intimidating group chanting aggressive and very horrible chants to anyone attending, I find these actions to be extremely unnecessary due to the fact that we are a group who want nothing but the betterment for all.

These activities and actions by this aggressive group are completely upsetting and in no way support a demonstration of respect and consideration towards attendees with families who were fearful about their safety, leaving them very anxious, especially for young children attending.

Once on the grounds it was also possible to still hear them due to large megaphones or speakers of sorts being used.

My overall impression of their actions is nothing similar to other demonstrations due to the fact that aggressive and intimidating behaviour towards anyone attending is extremely upsetting and some picketers were harrassive, even putting their heads through car windows, blocking traffic, upsetting and distracting drivers by getting in their way and shouting extremely loudly at anyone walking in.

Please can we find a way to not have this happen again so we can enjoy and share with many others our wonderful weekend event.

Kind regards,



Sent from my Galaxy

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19/02/2024

Subject:

Testimony regarding last IAS event

From: Sent:

19/02/2024 08:15:50

To:

Attachments:

Passeport JL.jpg

Dear Sir,

Here is a testimony as asked by

I also joined a copy of my passport

My wife came from France to join me and attend the International Association of Scientologists event. When we entered St. Hill grounds, a hostile man walked up to us making remarks denigrating Scientology. His behaviour which felt like a threat forced us to quickly move away from him. I would like to point out that he was filming us with his smartphone without our permission, so we feared that he would publish this verbal aggression against us on the Internet.



Mid Sussex District Council Oaklands Road Haywards Heath RH16 1SS

15 July 2024

Dear Sir/Madam,

I write on behalf of the Rockwood Park Residents Association to confirm our support for the Public Spaces Protection Order requested by the Church of Scientology, the draft of which we have seen.

Rockwood Park is situated directly opposite the main entrance of the Church of Scientology on Saint Hill Road, East Grinstead. This road can get very busy at times, particularly when the Church is holding one of their special events. At these times there can also be quite a lot of pedestrians on the road. Quite apart from the disturbance that protests on the road cause to our residents — particularly when amplified sound is used — and the abuse that some of our residents have experienced from the protestors, the road is not a safe place to hold such protests.

Yours faithfully,

Rockwood Park





Mid Sussex District Council Oaklands Road Haywards Heath West Sussex RH16 1SS

July 15th, 2024

Dear Sirs.

Re: Church of Scientology - Application for Public Spaces Protection Order

The Church of Scientology (CoS)have provided East Grinstead Rugby Football Club (EGRFC) with a copy of the draft Public Spaces Protection Order, and we have had appropriate conversations with them with respect to the reasoning behind this request.

The board of EGRFC support this application by CoS as we have in the past seen situations that could be prevented by such an order.

On reviewing the draft documents, we have seen we recommend that the area covered by this order includes not only the verge adjacent to the CoS land and the public highway but also the verge adjacent to EGRFC land and the car parks of EGRFC as these have been used inappropriately in the past.

To conclude EGRFC support such an order which we believe is necessary to protect persons accessing the CoS from Saint Hill Road, East Grinstead

Yours faithfully







Mid Sussex District Council

Oaklands Road

Haywards Heath

West Sussex

RH161SS

15th July 2024

To Whom it May Concern,

The East Grinstead Sports Club is a direct neighbour of the Church of Scientology on Saint Hill Road, East Grinstead. We approve of the proposed Public Spaces Protection Order to make the road safer for all concerned.

Yours sincerely