

APPENDIX SF

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

5th June 2025

Dear Lucy Corrie,

**Re: Proposed voluntary code of conduct.
Application by the Church of Scientology for a Public Spaces Protection Order (PSPo) on
Saint Hill Road**

Thank you for your letter dated 5th June 2025 in response to our comments regarding a proposed Voluntary Code of Conduct.

I am pleased to hear that if both stakeholders were willing to agree to a voluntary code of conduct and the Council assessed it was for the most part working well, the Council's position would be that a PSPo would not be necessary or proportionate. As protestors, we are committed to seeking a resolution that would protect our rights to assembly, our freedom of speech and to ensure any demonstrations on Saint Hill Road would not inadvertently cause disruption to the local community or Scientology's annual event.

As you have noted, there is no evidence to suggest the two protests that have occurred in the last six years have been the source of any anti-social behaviour, harassment, hate speech or disruption to the local community. In fact, the Church of Scientology's poor traffic management, obstructions placed along the public right of way, excessive use of loudspeakers to play repetitive bagpipe music, failure to apply for planning permission for their 45,000 square foot marquee and aggressive behaviour (such as pushing protestors into the road and into oncoming traffic) have caused significant disruption and safety concerns to both protestors and local residents in both years.

In order for a Public Spaces Protection Order to be implemented, statutory guidance states the activity it seeks to restrict must have "a detrimental effect on the quality of life of those in the locality; is (or is likely to be) persistent or continuing in nature and is (or is likely to be) unreasonable." Our case remains that there is no evidence to suggest our two protests meets any of these criteria, and that a PSPo would be disproportionate and unreasonable considering the Police already have sufficient powers with which to restrict protestors' behaviours, which they have not found it necessary to use.

In fact, Scientology's event is the source of the greatest disruption to the locality and there is ample evidence of their attempts to interfere with protestors' rights and of their active harassment of anybody who seeks to voice their concerns about their abusive, bully-like behaviours.

Although in principle I am happy to agree to some form of voluntary code of conduct to ensure our behaviour remains lawful, I am concerned doing so would only serve as a catalyst for Scientology to submit further complaints, which would not only take up limited Council resource but come at a significant cost to the taxpayer.

Throughout this process, Scientology have demonstrated it is consistently acting in bad faith and does not respect the rules imposed by local government. For example, a Planning Contravention Notice was issued last year due to their failure to apply for planning permission to construct a vast 45,000 square foot marquee to host the event; In both 2023 and 2024 Scientology placed planters, metal barriers and other obstructions along the public highway including a concealed fence, sleepers and hedgerow which West Sussex Highways have ordered must be removed; they have also blocked the paved area of Saint Hill Road close to the entrance of their property and claimed it is their private property despite planning documents and property boundary maps proving it is public land; and they have actively attacked, smeared and intimidated protestors in the form of a targeted campaign of

harassment which has included writing to our employers in an attempt to interfere with our professional lives and financial security.

It is my opinion that entering into a Voluntary Code of Conduct with the Church of Scientology would be futile unless it is explicitly clear what its purpose is and what repercussions it carries should it not be adhered to.

In your letter you mention that "if such persons (on either side) engaged in unacceptable behaviour of any kind, that might need to be examined as part of a broader reconsideration of whether a PSPO had become necessary or justified." I would like to seek clarity on this point. Does this suggest that should Scientology not uphold their side of the agreement, it would be possible to seek a PSPO that would place restrictions on their annual event?

I am in agreement that a voluntary code of conduct would act as a persuasive deterrent to inappropriate behaviours on the part of protestors, but based on Scientology's track record and continued attempts to attack and harass us throughout this process I fail to see how any voluntary code would act as a deterrent to Scientologists, who are faith-bound in following policies set out by their founder L. Ron Hubbard. These policies require Scientologists to "destroy" critics and former members and carry no penalty within their internal system of Ethics, which they see as superior to any law of the land. In my previous letter, I referenced some of these policies which include statements such as those it deems as enemies "have no rights of any kind" and "may be tricked, sued, or lied to or destroyed". Scientologists are *required* to follow these policies irrespective of any voluntary agreement made with any Council, and so it is important to us that any agreement involving the Church reflects this attitude. Scientology may very well be willing to enter into an agreement, but their history suggests doing so is only for the reason of using it as a weapon against any future protestors.

In response to paragraph 4, "the Council is inviting the parties to confirm their agreement that they will continue their current practices", I take issue with this due to the fact Scientology's current practices have been both disruptive and in bad faith, and if we were to enter into any sort of agreement, it needs to be clear that there are certain behaviours Scientology must cease, and its attitude toward protestors improved.

I cannot in good conscience enter into any agreement which would place restrictions on our freedom of speech and rights to peaceful assembly as protected by the European Convention on Human Rights. However, as mentioned I would be more than happy to reach an informal agreement with regard to our behaviours that would protect our rights.

Regarding your suggested amendments to the voluntary code of conduct, my response is as follows:

Paragraph 2: I would be happy to agree to your suggested amendment, although feel it important to note that we have a fundamental right to free assembly and there is no guarantee the Police would feel it necessary to restrict us to a designated area. May I suggest the following wording: *Protestors will remain in any designated space(s), if required by the Police at any time, other than for reasonable purposes such as (but not limited to) entering and exiting that space.*

Paragraph 6: I take issue with the Council's suggestion there were two incidents of Police asking protestors to remove a doll, and that there was an image of "a man burning in flames". This is the first I have heard of any such imagery being displayed, and certainly was not something that occurred at the protests in 2023 or 2024. Regarding the doll, there was no challenge to it being displayed in 2023, and it was only removed in 2024 as a gesture of goodwill by informal agreement with a Police officer on the day. As explained in my previous letter, there is no suggestion in Scientology scripture that it's "Sea Organisation", founder L. Ron Hubbard or 'Chairman of the Board' Captain David Miscavige are seen as holy figures and as such, displaying their likeness would not be the source of alarm or distress. I cannot agree to any restriction on our freedom of expression, which is protected by Article 10 of the Human Rights Act 1998.

I understand that the Council takes the view that using a toy doll "may have the potential to create a 'flash point' of dispute", but I would argue that likewise, using our images and photographs of protestors on their hate websites (such as STANDLeague.org and FreedomMag.org) and on social media in the form of the 10,000+ attack Tweets I have personally received in the last few months is

also a 'flash point of dispute'. One example is when I attended an East Grinstead Town Council meeting earlier this year, I was asked by the Leader of the Council to sit next to Scientology's UK [REDACTED] This is now being characterised by the Church as an example of me "stalking and harassing a female Scientologist" in posts using photos of my face brandished with offensive slogans and slurs such as "proud stalker of women". I ask that should the Council implement paragraphs 6(a) and 6(b), they would consider also implementing a similar restriction on Scientology using our likeness in their propaganda materials.

However if the Council agrees, as we are content to agree to the broad outlines of the proposed Code of Conduct, we are happy to agree that paragraphs 6(a) and 6(b) be removed on the basis the regulation of images is a matter for the police.

Paragraph 7: We would be happy to agree to the proposed amended wording so that it reads *"Protestors will follow and comply with any instructions given by the police and/or officers of MSDC as regards the use of amplified music, voice or audio"*

Paragraph 8: With regard to filming and photographing activities, it seems that this clause remains unbalanced in Scientology's favour. While restrictions are placed on our rights to film/photograph, it remains unclear how this will be monitored with regard to Scientology's excessive CCTV cameras which are trained on the public highway and areas previously designated as protest areas. I would like to reiterate that we have no objection to Scientology filming, photographing or otherwise recording us and I would like to ensure that we retain the right to film or otherwise record any interactions we have with security and/or Scientology agents – so as to ensure we have evidence of any aggressive behaviour, such as when a security agent pushed a protestor into the road with oncoming traffic in 2023. If these points can be satisfied, we would be happy to agree to the amended wording proposed.

Paragraph 9: I agree that there is a clear distinction between offering, providing or distributing leaflets and *approaching* persons with leaflets. May I ask that the wording be altered so as to clarify this specific point, so that it clearly defines what the Council would consider "approaching"? For example, if a member of the public was to walk past us and a protestor was to take a leaflet and present it to them as they walked past, would this be considered an "approach"? I would also like to seek clarity on how we are to assess whether passersby are due to enter or exit the Church premises? Historically, the public highway immediately around the entrance to the property has been obstructed with tables, metal barriers, planters and around a dozen Scientology and security agents meaning protestors have had to gather to the south of the entrance. This means that it is not always possible to know whether somebody walking past is about to enter the property, or has just left it – and there is no way for us to differentiate between members of the public walking past and event attendees who, after walking past protestors, will then decide to enter the property.

With regard to your suggested final provision, we are happy with the wording as the Council has suggested: *"Compliance with the terms of this Code, and the degree to which the Codes have helped to regulate and improve activities at Saint Hill Road, may be assessed by MSDC if for any reason it is required to reconsider taking enforcement action to ensure public safety at the protest site. Such enforcement action includes but is not limited to the making of a Public Spaces Protection Order (PSPO)."*

I am pleased to hear that Scientology have agreed to the majority of their side of the Code of Conduct, but would like to make the following points:

- Regarding paragraph 8 and the point around the Licensing Act 2003 and event planning, I disagree that this is not a matter which has any bearing on protests or protestors who attend demonstrations at Saint Hill Road. By engaging with protestors and the Council ahead of their annual IAS event in or around October, appropriate measures can be put in place to minimise any potential disruption caused by any planned protests, and I would argue that greater transparency on Scientology's side is needed to mitigate any future problems that may arise due to protest activity. We publish all of our plans including our march route, start/end times, intended locations and rules/behaviours on our website well ahead of any announcement that a protest may occur, however Scientology have not historically shared any information about their event publicly or with protestors.

In both 2023 and 2024, I emailed the Church of Scientology seeking information such as their entry and egress plans, expected guest arrival times and traffic management plans so that we can organise our demonstration in a fashion that would cause minimal disruption. However, Scientology have not been forthcoming in sharing such plans and therefore this has created a point of difficulty for us requiring flexibility on the day. We would be appreciative if the Church would consider providing the Council (and by extension, protestors) some key elements of their event plans 6 – 8 weeks in advance, so that we can make any reasonable adjustments to mitigate potential issues on the day.

- There is currently no provision relating to Scientology's failure to comply with planning regulations. Last year, MSDC issued a Planning Contravention Notice due to their unauthorised structure that dwarfs and overshadows the Saint Hill Castle and Grade II-listed Manor, and the use of this structure is directly related to their event. It therefore has an impact on any potential protests. Would the Council consider including a clause so as to require the Church to apply for any required planning permission for any structures intended to be used for the event?
- Similarly, although the Church has agreed not to obstruct protestors, in the past Scientology has directed its members to park cars along the verge prior to the start of our demonstration. This is something the Church may argue is an example of an 'action of individual Scientologists beyond their control', and so they may continue to use this as a method to disrupt protestors. Would the Council consider including a clause in their agreement with the Church that specifies they must take reasonable steps to ensure its members do not park on the verge during their event weekend, for example by placing cones or temporary signage prior to protestors' arrival that restricts road users from parking their vehicles along the road?
- Due to Scientology's altering stance on the boundary of their property and repeated allegations that protestors standing on the paved area by the entrance of Saint Hill are infringing on their private land, might it be possible for both Voluntary Codes of Conduct to include an official map that clearly shows where the boundary of their land falls in the vicinity of their gates, for the avoidance of doubt so that it can be easily referred to should any disagreements arise in the future?
- On the Council's note regarding paragraph 6, I feel it necessary to note that in both years, protestors complained to the Church and Police present on the day that their use of amplified, repetitive bagpipe music was a public nuisance and cause of disruption to us and local residents. No adjustments to the volume of the music were made in 2023 and in 2024, Scientology would turn the volume down for a short period of time, only to then turn it back up again a few moments later – requiring us to make repeated requests for it to be turned down. Although Scientology may be willing to agree to a point in the voluntary code that addresses this issue, what assurances can the Church give that it will abide by its commitment to follow any instructions provided by the police and/or local authority – as this has not been the case in the past?

I agree that we are close to reaching a final agreement that will avoid the implementation of a PSPO and look forward to hearing back from you.

Kind regards

[Redacted signature]