Your Ref



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Contact Lucy Corrie

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Date 22nd May 2025

Peter Hodkin, Solicitor Hodkin and Company

BY EMAIL ONLY

Dear Mr Hodkin,

Re Meeting at Mid-Sussex District Council 28th April 2025. Application by Church of Scientology for a Public Spaces Protection Order (PSPO) on Saint Hill Road and West Hoathly Road, East Grinstead.

Thank you for meeting with Council officers on the 28th April 2025 with your colleagues to discuss the application by the Church of Scientology (the Church) for a PSPO on Saint Hill Road and West Hoathly Road, East Grinstead. I attach the notes taken of the meeting again for completeness.

As you know, Council staff have also met with representatives of the Protester group to discuss the application for a PSPO on Saint Hill Road and West Hoathly Road, East Grinstead.

The Council have considered responses from both the Church and Protesters and from Sussex Police, West Sussex Highways Authority and residents of East Grinstead. The Council have made early observations about what parties have said. It appears that a reasonable and proportionate approach in the first instance is to invite the Church and Protesters to mutually and voluntarily agree to comply with a list of obligations and behaviours surrounding Saint Hill Road and West Hoathly Road, particularly in relation to the annual International Association of Scientology (IAS) event. We are describing this list as a "voluntary code of conduct" as it is intended to ensure that all stakeholders at the site act in a lawful and peaceful fashion, and in a manner which balances the competing interests of the Church, its members, local residents and protesters.

The Council accepts that some of these items already reflect the Church's practices during recent protests and therefore hopes they will be uncontroversial.

The Church's response to this request will assist the Council in making a recommendation on agreeing or not agreeing to a PSPO.

Voluntary Code of Conduct for Church of Scientology arounds protests at Saint Hill Road:

- 1. The Church (its staff, volunteers, agents and/or contractors) shall follow and comply with any instructions given by the police and/or any officers of MSDC or WSCC.
- 2. The Church shall ensure that persons providing stewarding or security services in and around its property are identifiable to members of the public by wearing high-vis jackets, armbands or similar.
- 3. The Church shall provide adequate lighting at the entrance to its premises on Saint Hill



Road to ensure the safety of pedestrians and vehicles entering or exiting its premises from the public highway. The adequacy of lighting should be agreed with the police and MSDC in advance of an event (and/or the same lighting may be provided if previously agreed).

- 4. The Church (its staff, volunteers, agents and/or contractors) shall not attempt to enter or interfere with a space designated by the police for use by protesters whilst protesters are present within that space.
- 5. The Church (its staff, volunteers, agents and/or contractors) shall not obstruct (or attempt to obstruct) protesters from entering or exiting the area designated for their use.
- 6. The Church shall not play or use amplified music, voice or audio except at designated times agreed in advance with MSDC and the police and shall comply with the requirements of the Licensing Act 2003 and the premises licence issued by MSDC namely, a Noise Management Plan will be submitted to the Licensing Authority for all licensable activities at the premises. It will be reviewed annually and if necessary, during its term, as required. It must be submitted to the Licensing Authority on or before the anniversary of the issue (2nd August) of the Licence.
- 7. The Church (including but not limited to its staff, volunteers, agents and/or contractors) shall not film or photograph protesters who remain within the space designated by the police for their use.
- 8. The Church (including but not limited to its staff, volunteers, agents and/or contractors) shall comply with the requirements of the Licensing Act 2003 and the premises licence issued by MSDC namely, you are required to notify the relevant health and safety enforcing authority of all upcoming events to be held within the grounds of Saint Hill Manor, 6 weeks prior to the actual event occurring detailing the nature of the event and any activities carried out on site.
- 9. The Church shall ensure that printed and laminated copies of both Voluntary Codes of Conduct are displayed in locations on or visible from the public highway in and around the entrance(s) to Church property and the designated protest space, during Church events at which protesters are expected to attend.

For your information, we are also inviting the protesters to agree to comply with a corresponding Voluntary Code of Conduct for Protesters at Saint Hill Road, which is proposed as follows:

- 1. Whilst protesting on Saint Hill Road, protesters will follow and comply with any instructions given by the police and/or any officers of MSDC or WSCC.
- 2. At all times protesters will remain in a space designated for their use in agreement with the police, other than for the reasonable purposes of entering and exiting that space.
- 3. At all times protesters will remain on public land or the public highway. In particular they will not enter (or attempt to enter) the property of the Church at any time.
- 4. Protesters will not obstruct (or attempt to obstruct) any persons from entering Church premises.
- 5. Protesters will not (or will not attempt to) harass, intimidate or abuse any persons attending events at Church premises, or persons providing security or stewarding services for Church events. This includes using foul or abusive language.
- 6. Protesters will not display images, text, banners, placards, posters or similar which include:
 - a. Foul or abusive language; or
 - b. Images which actually depict, or which might reasonably be considered to depict, members or leaders of the Church.
- 7. Protesters will not play or use amplified music, voice or audio.



- 8. Protesters will not film or photograph any persons entering or exiting Church premises.
- 9. Protesters will not approach persons entering or exiting Church premises with leaflets or similar.
- 10. Protesters shall display this Voluntary Code of Conduct on their website and shall ensure that copies are available for any persons attending as protesters during any events at Saint Hill Road.

I would be grateful if you can confirm receipt of this email and confirm whether the Church would be willing to agree to comply with this suggested list. If not, we would welcome any further comments or suggestions you would like to provide within 7 days receipt of this letter.

Yours sincerely

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Lucy Corrie Assistant Director – Communities Mid Sussex District Council

