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L. C. HOBBS & SON Ltd

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SAINT HILL FARM SAINT HILL GREEN EAST GRINSTEAD WEST SUSSEX RH19 4NG

TEL: [REDACTED] FAX: [REDACTED]

17<sup>th</sup> March 2016

Planning & Environment Dept.  
**Mid Sussex District Council**  
Oaklands  
Oaklands Road  
Haywards Heath  
RH16 1SS

Re: Planning Application DM/16/0734

Dear Sirs,

I submit my comments in regard to the above application in my capacity as the agricultural farmer who actively farms the land known as Saint Hill Farm and which boundaries the application field to the South-West (refer to attached marked up plan – land hatched blue).

I set out my objections to the application as below which incontestably demonstrate that the application is invalid and summary unlawful.

- 1) The application field of Ordnance Survey TQ38017 36114, Field No 0516 is NOT the property of the Church of Scientology OR the supposed occupier Mr. Ian Lazenby. The freehold of the property is that of a Ms. V Bonwick who has resided in the USA for the past thirty years. The freehold ownership is appropriately lodged with the Land Registry and has been since Ms V Bonwick took ownership of the land in the 1970s.
- 2) In the early 1970s when Ms V Bonwick took ownership of the field, she granted permission to my grandfather Mr L C Hobbs, the right to pass across her land between the current gateway onto Saint Hill Road, and his land to the South-West. The access points are show as green asterisk on the attached marked up plan. For three generations and in excess of 30 years we have continued to use this access route, uninterrupted and on frequent occasions each and every year as we undertake agricultural field operations to our land beyond. Accordingly, it cannot be claimed that the entire field has been continuously used as a car park since 2002 on the basis that the access and transit of agricultural vehicles/implements could not have otherwise taken place.
- 3) When Ms V Bonwick left the UK for residency in the USA in the late 1970s she passed all responsibility of the land to my grandfather Mr L C Hobbs (of L C Hobbs & Son Ltd) permitting him to carry out livestock grazing and the taking of forage at will. As this agreement was established prior to January 1996 then an Agricultural Holdings Act (AHA) Tenancy was entered into and security of tenure established. This tenancy remains to this day and continues with the consent of Ms V Bonwick.

- 4) Finally, I enclose five aerial photographs, available in the public domain via Google, taken over a number of years but which serve to undeniably invalidate the "continuous use of the field as a car park".
- a. **Photo 1** – 2004 – note the large round hay bales in the field and the grass mowing lines consistent with agricultural activities. And no parking in the field.
  - b. **Photo 2** – 2005 – field being used (with my permission) for camping over a weekend hockey festival hosted by the adjoining EG Sports Club. Parked vehicles are those associated with the weekend camping.
  - c. **Photo 3** – 2008 – no vehicles parked in the field.
  - d. **Photo 4** – 2012 – no vehicles parked in the field.
  - e. **Photo 5** – 2013 – no vehicles parked in the field.

Furthermore, by referring to the enclosed photographs you will clearly see, on each & every photograph, a very heavily trafficked and worn track leading from the road to our land (around the building). This is our access route referred to in paragraph 2 above. It is very obvious that the track is frequently and heavily used throughout the year and so it could be said that, if this field was being used for general car parking, then our access route would show signs of re-routing/deviation as diversions would have been necessary around any parked vehicles.

In closure I can state that the Church of Scientology (and others) have used the field for occasional overflow parking, but only when hosting high-attendance events. My recollection is that these occasions have been infrequent and therefore probably [rightly] fall within the permissive rights under Part 4 of the Town & Country Planning General Permitted Development Order (i.e. the 28-day rule) but certainly don't constitute sufficient evidence to demonstrate continual use for the requisite minimum 10-year period. The application and supporting 'evidence' is, at best, thin in substance and it is quite apparent that the applicant is seeking to gain permission for activities which extend way beyond the reality of the situation, as it has been.

Yours faithfully,

Tony Hobbs  
Director



H.M. LAND REGISTRY			TITLE NUMBER <b>SX 134323</b>	
ORDNANCE SURVEY PLAN REFERENCE	COUNTY <b>SUSSEX</b>	SHEET COUNTY OF SUSSEX MID SUSSEX DISTRICT	NATIONAL GRID TQ 3735 - 3736 TQ 3835 - 3836	SECTION
Scale 1:2500			© Crown Copyright	



Photo 1





Photo 2





Photo 3



Image © 2013 GeoMapping, plc

Google earth

Tour Guide

Imagery Date: 1/1/2008 51°06'30.34" N 0°01'48.18" W elev. 134m eye alt. 586m



Photo 4



⌵ Tour Guide

Imagery Date: 8/31/2012 51°06'27.38" N 0°01'46.57" W elev 134 m eye alt 586 m



Photo 5



Tour Guide

Imagery Date: 6/6/2013 51°06'29.90" N 0°01'40.92" W elev 135 m eye alt 586 m

