

Thursday 7th May 2026

Dear Mid-Sussex District Council.

This representation is submitted in formal objection to planning application DM/25/2223.

It is contended that the proposed development is contrary to the development plan, the National Planning Policy Framework (NPPF), and associated guidance. The application fails to demonstrate that the proposal constitutes sustainable development and, further, that it satisfies the stringent tests required for development within the High Weald Area of Outstanding Natural Beauty (AONB).

Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications must be determined in accordance with the development plan unless material considerations indicate otherwise.

The relevant policies include:

Mid Sussex District Plan (2014–2031)

- DP1 – Sustainable Development
- DP5 – Settlement Boundary
- DP6 – Development in the Countryside
- DP12 – Protection and Enhancement of Countryside
- DP13 – High Weald AONB
- DP19 – Transport
- DP22 – Rights of Way and Other Recreational Routes
- DP26 – Character and Design
- DP29 – Noise, Air and Light Pollution
- DP38 – Biodiversity

National Planning Policy Framework (NPPF)

- Paragraph 8 – Sustainable development objectives
- Paragraphs 180–188 – Pollution and amenity
- Paragraph 190 – Major development in protected landscapes
- Paragraph 200 – Highway safety
- Paragraph 174 & 176 – Protection of valued landscapes

The site lies within the High Weald AONB, where the highest level of protection applies. Under NPPF paragraph 190, major development should be refused except in exceptional circumstances and where it can be demonstrated to be in the public interest. This requires consideration of alternative sites, demonstration of public benefit and assessment of environmental harm.

The proposal relates to a private, closed event, not one providing meaningful public access or benefit. Assertions of public interest are therefore unsubstantiated. The applicant asserts no alternative sites exist. This is demonstrably incorrect: the event has historically been held outside Saint Hill and suitable venues exist at significantly larger scale (e.g. major exhibition and event centres). No robust site selection exercise has been undertaken, contrary to NPPF paragraph 190(b).

It must also be noted that the Church of Scientology are currently building a huge events venue at their headquarters in Clearwater, Florida known as L. Ron Hubbard Hall. In their own published promotional material, they make it clear that this will ultimately become the new venue for all international events - including the annual IAS event which takes place at Saint Hill. This means that once the L. Ron Hubbard Hall is completed, whatever development is approved at Saint Hill will be rendered completely useless as events will no longer take place there. This means that the proposals seek permanent alteration and urbanisation of a protected AONB, despite its long-term use not extending beyond a couple of years. It is therefore unjustified and completely unnecessary.

The proposal introduces permanent infrastructure into a rural field for use limited to a small proportion of the year. Although the field may continue to 'appear' to be a field due to the proposed geo cell grid system, it is still permanent alteration and urbanisation that conflicts directly with DP13 (High Weald AONB) and NPPF paragraphs 174 and 176.

Under DP6 and DP12, development in the countryside must maintain rural character and be necessary for its location.

The proposal fails both tests: The development is not functionally dependent on this location and the scale of infrastructure is disproportionate to its limited use. The site is acknowledged to be unused for: approximately 87% of the year (parking) and approximately 96% of the year (overall use). This represents an inefficient and unjustified use of land.

A fundamental concern is the internal inconsistency of the application documentation, including conflicting attendance figures; contradictory traffic volumes; inconsistent financial data and discrepancies in duration and frequency of use. Such inconsistencies undermine the credibility of the submission and prevent the Local Planning Authority from relying on the evidence presented.

In particular, traffic flows vary significantly across documents; attendance figures do not reconcile mathematically and economic data varies across sections without explanation. This is contrary to the requirement for robust and proportionate evidence in decision-making.

The economic assessment relies heavily on multiplier effects, which are inappropriate in this context due to internalised spending within the applicant organisation and limited local supply chain engagement. The economic assessments also fail to take into account the high proportion of hospitality and accommodation offerings locally that benefit financially from the event, which are owned by Scientologists who in turn donate profits straight back to the Church. This creates a closed loop economy that does not benefit or impact the local area whatsoever. There is also no mention at all of the millions of pounds that parishioners spend in 'donations' to the IAS at this event - which is money extracted from the local economy. Last year, a trophy was awarded to one individual who donated \$360 million to the IAS. This event does not benefit the local economy, but detracts from it - and any economic assessment must include an analysis of money taken out of the local economy, not just the money spent on hotels and Airbnbs.

Evidence indicates that a small proportion of expenditure occurs within Sussex, significant spending occurs outside the local economy and on-site spending does not benefit local businesses

The proposal relates to a three-day annual event, yet claims are made regarding full-time equivalent employment and sustained job creation. These claims are speculative and conflict with the reality of temporary, event-based employment, especially considering the majority of event staff hired to work at the event are Scientology staff members who are paid less than minimum wage and are, for all intents and purposes, modern slaves.

The application relies heavily on claims of public benefit, yet the event is not open to the general public and attendance is restricted and controlled. This undermines compliance with NPPF paragraph 190 (public interest test) and DP1 (Sustainable Development).

The Transport Assessment is flawed: the survey was conducted under non-event conditions and does not reflect actual peak demand. Traffic data is inconsistent, providing conflicting figures for vehicle numbers and there are discrepancies between assessments.

There are also significant safety concerns such as shared access for entry and exit, insufficient capacity for two-way movement and existing accident history not adequately addressed are all mentioned in the applicant's own provided documents. Yet, there are no proposals for pavement or street lighting around the entrances to improve pedestrian safety.

The proposal therefore conflicts with DP19 (Transport) and NPPF paragraph 200 (safe and suitable access).

The application fails to adequately assess event noise levels, traffic congestion and idling vehicles and construction and dismantling impacts. Noise measurements were not undertaken during the event itself, rendering conclusions unreliable. Similarly, the Air Quality Assessment relies on a flawed assumption of no additional traffic and fails to consider construction-related emissions. This conflicts with DP29 (Noise, Air and Light Pollution) and NPPF paragraphs 185–188.

The application acknowledges potential harm to protected species (Great Crested Newts), including injury or mortality and habitat disturbance. This represents a clear risk of non-compliance with DP38 (Biodiversity) and NPPF paragraph 180.

The applicant's own assessment concludes that the heritage impact is "neutral". However, policy requires conservation and enhancement, not neutrality and the proposal introduces visual and functional change to the setting. This conflicts with DP26 (Character and Design).

The proposal includes up to 12 weeks of annual works, yet no detailed assessment of impacts is provided and no mitigation strategy is clearly defined. This represents a significant omission in assessing the proposal's full effects.

The application relies on the premise that the site is already used for such events, however existing use does not equate to lawful use. The applicant was issued a Planning Contravention Notice for their existing use and construction, and although the application is pitched as a ratification or formalisation, it is important to ensure proper and comprehensive assessments are carried out to scrutinise the application rather than considering this a 'tick-box' exercise. Historic unauthorised use cannot justify permanent development. This is a material consideration that weighs against the proposal.

It must also be considered that although East Grinstead Town Council have now voted to approve this application, out of the three Councillors who voted only one had not received gifts/hospitality from the Church of Scientology, leading to serious concerns regarding impartiality and bias.

In conclusion, the proposed development:

- Conflicts with the development plan as a whole
- Fails to meet the stringent requirements for AONB development
- Relies on inconsistent and unreliable evidence
- Overstates economic benefits while understating environmental harm
- Fails to demonstrate public benefit or necessity

I therefore strongly urge the Council to reject the application.