



## LICENSING AUTHORITY

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

### Application for the review of a Premises Licence or Club Premises Certificate under the Licensing Act 2003

#### PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

Before completing this form, please read the guidance notes at the end of the form. If you are completing this form by hand please write legibly in block capitals. In all cases ensure your answers are inside the boxes and written in black ink. Use additional sheets if necessary. You may wish to keep a copy of the completed form for your records.

**I/We** Alexander Barnes-Ross. **apply for the review of a Premises Licence under Section 51/apply for the review of a Club Premises Certificate under Section 87 of the Licensing Act 2003 for the premises described in Part 1 below (delete as applicable)**

#### Part 1 – Premises or club premises details

**Postal address of premises or club premises, or if none, ordnance survey map reference or description**

Church of Scientology  
Saint Hill Manor  
Saint Hill Road

**Post town** East Grinstead

**Post code (if known)** RH19 4JY

**Name of Premises Licence holder or Club holding Club Premises Certificate (if known)**

Church of Scientology Religious Education College, Inc.

**Number of Premises Licence or Club Premises Certificate (if known)**

PWA0364  
LI/24/1425

#### Part 2 – Applicant details

I am

**Please tick ✓ yes**

- 1) An individual, body or business which is not a Responsible Authority (please read guidance note 1, and complete (A) or (B) below)

✓

2) A Responsible Authority (please complete (C) below

☐

3) A member of the Club to which this application relates (please complete (A) below

☐

**(A) DETAILS OF INDIVIDUAL APPLICANT** (fill in as applicable)

Mr ☐ Mrs ☐ Miss ☐ Ms ☐ Other title  
(For example, Rev) ☐  
Surname First names

[Held by the Licensing Authority]

[Held by the Licensing Authority]

Please tick ✓ yes

I am over 18 years old or over

☒

**Current postal  
address if different  
from premises  
address**

[Held by the Licensing Authority]

**Post town**

[Held by the  
Licensing Authority]

**Postcode**

[Held by the Licensing  
Authority]

**Daytime contact telephone number**

[Held by the Licensing Authority]

**Email address (optional)**

[Held by the Licensing Authority]

**(B) DETAILS OF OTHER APPLICANT**

Name and address

Telephone number (if any)

E-mail address (optional)

**(C) DETAILS OF RESPONSIBLE AUTHORITY APPLICANT**

Name and address

Telephone number (if any)

E-mail (optional)

**This application to review relates to the following licensing objective(s)**

**Please tick one or more boxes ✓**

- 1) the prevention of crime and disorder
- 2) public safety
- 3) the prevention of public nuisance
- 4) the protection of children from harm

✓

✓

✓

✓

**Please state the ground(s) for review (please read guidance note 2)**

I have grounds to believe the Premises Licence Holder has failed to meet the licensing objectives of the prevention of crime and disorder, public safety, the prevention of public nuisance and the protection of children from harm.

The Licensing Act 2003 explanatory notes states:

"The third licensing objective, the prevention of public nuisance, will not extend to every activity which annoys another person but will cover behaviour which, when balanced against the public interest, is found to be unacceptable."

This application for review is also submitted on the grounds the Premises Licence Holder has failed to meet their obligations under the Mid-Sussex District Council Statement of Licensing Policy:

Section 3.1: "The Immigration Act 2016 places a duty upon licensing authorities to ensure all applicants for premises and personal licences have the right to work in the United Kingdom and that licences and authorisations are not issued to persons who are unable to provide evidence of such."

Section 5.7 "Larger or high-risk outdoor events or events which are deemed unusual in nature will be expected to have met with, and sought the advice of, the multi-agency Safety Advisory Group (SAG) so that the safety and control of the event can be planned several months in advance. The Licensing Authority will assist with advice and guidance."

Section 5.8 "The Licensing Authority believes a level of responsibility for customer or member behaviour clearly exists beyond the site boundary."

Section 8.4 states that the Operating Schedule "should include conditions designed to mitigate the likelihood of the premises contributing to issues in the local area"

Section 8.7 “The Licensing Authority expects the operators of all premises to have regard to the need to provide appropriate safeguarding for vulnerable people (both children and adults)”

Appendix located at: <https://drive.proton.me/urls/9QCPJWCYQW#r8sW2Gtf9Vqx>

**Please provide as much information as possible to support the application** (please read guidance note 3)

Over the last three years, the Church of Scientology have hosted a large gathering at their Saint Hill compound across one weekend in October, which thousands of people attend from across the world. This gathering, known as the IAS event (International Association of Scientologists) causes considerable disruption to the local community and it is clear the licensing objectives are not being met.

I am not seeking for the Premises Licence to be revoked entirely, as I believe the Church of Scientology have the right to hold events on their property and have no objection to them doing so. However, I do believe that the conditions on the licence are inadequate and greater measures are required so as to ensure the licensing objectives are being met, and to minimise the disruption caused by larger-scale events at the property, such as the annual IAS event.

#### **Prevention of Crime and Disorder**

Many of the workers who are flown in to facilitate the IAS event do so under the visa waiver program or using Religious Minister visas, which stipulate the worker must be engaging in clergy work that relates to the administering of religious practice, not sales, fundraising, video production or event management.

The IAS event is as its primary function a fundraising exercise for the Church of Scientology's membership body and generates millions of dollars for the organisation annually. The Patrons Ball, which typically takes place on the Saturday, is a black tie dinner at which Scientology's donors receive trophies and awards for donating vast sums of money, as evidenced by promotional materials published by the church after the event. Ticket prices start at \$600, and a number of staff from overseas are expected to perform tasks unrelated to the administering of Scientology's so-called religious activities, such as sales and event production.

The local authority has not done due diligence to ensure those visiting the United Kingdom in order to work at this event are doing so under the correct visa/work permits, and having spoken to several ex-workers, it is clear this is a systemic, repetitive issue that has not been duly investigated.

In December 2025, the Church of Scientology was the victim of a ransomware attack by Russian cybercriminal group *Qilin*, who accessed and published a number of internal documents relating to the Premises Licence Holder and the IAS event held at Saint Hill. These documents include evidence a number of workers were flown from Scientology properties in Europe to work as security staff during the IAS events in 2024 and 2025 (Appendices 01A and 01B) and that at least 4 staff members were working at the property without the required work visas during the event that took place in October 2025 (Appendix-02).

A Freedom of Information Act request submitted to the Home Office revealed that in 2023, a total of 21 religious worker visas had been granted under sponsorship by the Premises Licence Holder (Appendices 03A and 03B). Legislation requires workers to be paid at least the minimum wage, which for a full time 40 hour work-week would have equated to £21,673 per annum. Staff at Saint Hill are members of Scientology's 'Sea Organisation' and sign one-billion year contracts and are expected to work 7 days a week, often 14-16 hours a day with no time off. They are provided communal berthing, food and a weekly stipend of just £50 a week for their lifetime of service. Even if the holders of these visas were working just 40 hours per week, one would expect to see an increased expenditure on staff wages of £455,145 reflected in the Premises Licence Holder's annual accounts if they were being paid the National Minimum Wage. However, the 2023 accounts filed with Companies House (Appendix-04) show an increased expenditure of just \$294,860 AUD (£148,095 GBP) which suggests the workers at Saint Hill who have had their visas sponsored by Scientology are not being paid minimum wage, which is in breach of visa rules.

Under the Immigration Act 2016, as specified under Section 3.1 of the Mid-Sussex District Council Statement of Licensing Policy, the Licensing Authority has a statutory duty to ensure licences and authorisations are not issued to "persons who are unable to provide evidence" of rights to work. There are currently no conditions on the Premises Licence which relate to overseas workers, visas or the minimum wage and for this reason, I believe greater scrutiny is required to ensure the Premises Licence Holder is meeting their obligations under UK legislation to ensure staff members visiting the UK in order to work at large-scale events, such as the IAS event at Saint Hill, are doing so with the correct visas and that they are being paid the minimum wage.

The Church of Scientology has a documented history of engaging in illegal activity including the largest infiltration of the US government in its history, known as Operation Snow White. They have also been found guilty of fraud on multiple occasions in Europe and were rejected by the Charity Commission in 1999 after it ruled Scientology "does not benefit the public." The current Premises Licence allows the organisation to engage in prolific fundraising activities for an overseas entity with no checks and balances to ensure such activity is taking place lawfully and without threat, coercion and/or intimidation. It is therefore necessary for the Council to consider limiting the scale of events held on the property so as to minimise the likelihood of such illegal activities taking place, or having a widespread impact on the local economy.

### **Public Safety**

During the IAS event held at Saint Hill in 2023, 2024 and 2025, inadequate measures were put in place by the Premises Licence Holder so as to protect the public, and evidence suggests there is a lack of due regard for public safety during these large-scale events.

The premises is located on Saint Hill Road, a dark and narrow country lane that is ill-equipped to handle the foot and vehicular traffic generated by large-scale events. During the Council's review of the Premises Licence Holder's application for a Public Spaces Protection Order in 2025, meeting notes evidence a concern from the Licensing Authority and Sussex Police around public safety and demonstrate a lack of precautions taken on the Licence Holder's part in order to mitigate these concerns (Appendix-05).

Although the Premises Licence Holder agreed to review its security arrangements so as to satisfy the authorities' concerns around public safety, the measures suggested in this meeting were not implemented during the 2025 IAS event. Namely, additional lighting was not implemented around the entrance to the property, an alternative entrance was not provided for pedestrian traffic that would prevent people from walking in the road and security staff did not wear hi-vis jackets.

In 2025, the Premises Licence Holder was granted a Planting Licence by West Sussex Highways, which authorised the planting of 35 trees to create a hedgerow on public land directly opposite the entrance to their property. However, inspections by the Highways Authority show that a total of 105 trees were planted, leading to an unlawful obstruction of the public right of way which minimised the space available as a pedestrian refuge along Saint Hill Road. The Premises Licence Holder also erected hoarding along the Highway around the entrance to their property which, although was authorised under the assumption it would create a barrier between pedestrians accessing the site for the event and road traffic, in practice resulted in an increased number of pedestrians walking in the road in order to avoid the hoarding (Appendix-06).

In addition to the hoarding, the Premises Licence Holder also placed planters and other obstructions on public land directly outside their entrance during the event in both 2024 and 2025, which despite being ordered to remove by Highways, remained in place for the entirety of the weekend.

This resulted in a dangerous environment which put members of the public in an unnecessary amount of danger, which is evidenced in live streams and video footage captured by protestors outside the event across the weekend at the following URLs:

[https://www.youtube.com/watch?v=FhEwDUI\\_xzc](https://www.youtube.com/watch?v=FhEwDUI_xzc)

<https://www.youtube.com/watch?v=fSI9k4smASA>

<https://www.youtube.com/live/m9wVhc1eDus?si=k0GX4jCVzh8aLjkW>

<https://www.youtube.com/live/DhINZyClrto?si=xryYVC-AfyGJv2BZ>

<https://www.youtube.com/live/BhDKuqJ2Lyc?si=IU0cw2SZICHmp0Ey>

For the 2025 event, West Sussex Highways implemented an emergency Temporary Traffic Regulation Order (TTRO) across the weekend, reducing the speed limit on Saint Hill Road to 40mph as a result of the obstructions and resulting danger posed to pedestrians. Evidence relating to this, and demonstrating the Premises Licence Holder's lack of due regard for public safety is contained in Appendices 07, 08, 09, 10 and 12 and 13.

These obstructions are a direct consequence of the IAS event, which takes place on the property once a year, and must be considered as part of the Premises Licence review under Sections 5.8 and 8.4 of the Mid-Sussex District Council Licensing Policy, which states "the Licensing Authority believes a level of responsibility for customer or member behaviour clearly exists beyond the site boundary" and the Operating Schedule "should include conditions designed to mitigate the likelihood of the premises contributing to issues in the local area."

Section 18.2 states the Licensing Authority "does not regard the review process as a first resort to solve a problem. It does expect some intervention and discussion by an enforcement agency in an effort to resolve and prevent problems escalating." It is clear that intervention by the relevant enforcement agencies has so far failed to resolve the issues of public safety and over the last three years, the problems have in fact escalated. Unfortunately, the advice of MSDC based on the outcome of the PSPO (which suggested lesser measures be implemented, and for a new pedestrian entrance to be created) has been ignored, as has intervention by WSCC Highways with regard to obstructions on the public highway.

Appendix 13 are the notes from a meeting MSDC officers held with WSCC Highways during the PSPO process, which demonstrates the public safety concerns generated as a result of the event, which have not been remedied.

The Premises Licence Holder has wilfully disregarded their obligations in several respects relating to public safety and it has therefore become necessary and justified for the Licensing Authority to intervene to ensure the licensing objective is met during the IAS event, either by implementing additional conditions on the licence or by

restricting the size/scale of larger events on the property.

It is important to note these problems relate only to the annual IAS event, which takes place once a year, and there is no evidence the licensing objective of public safety is not being met during smaller events such as the Easter Egg Hunt, Christmas Light switch-on event or Summertime Swing. For this reason, I do not feel it necessary to revoke the licence entirely, but rather to place a restriction on the number of attendees permitted at events on the property.

Under their existing Premises Licence, the Church of Scientology are required to provide the Council with at least 6 weeks' notice of events so as to allow the authorities to plan accordingly. This was raised by the Council during the PSPO process (Appendix 05), and notification was duly given in 2025 6 weeks before the event took place, however the notification did not include the actual date of the event – which was announced less than 3 weeks ahead of time. This places unnecessary strain and a burden on limited Council resources and blue light services, and so a condition that specifically requires the *date* of the event to be included in the 6 weeks' notification would also be justified.

### **The prevention of public nuisance**

In 2025, there was widespread media coverage of the disruption caused by the IAS event to the local community: <https://www.theargus.co.uk/news/25593532.scientologists-played-bagpipe-music-east-grinstead/?ref=rss>  
<https://www.theguardian.com/world/2025/nov/09/east-grinstead-hosts-scientology-uk-headquarters-event-tom-cruise>  
<https://www.thesun.co.uk/tvandshowbiz/37207243/tom-cruise-helicopter-east-grinstead-scientologists/>  
<https://www.themirror.com/entertainment/tom-cruise-scientology-event-helicopter-1483477>

Unlike smaller events at the property, the IAS event is attended by thousands of people who travel from across the world in order to attend the gathering (Appendix 11). This leads to a significant increase in congestion and disruption to the locality which amounts to a public nuisance, as evidenced by photographs taken by the Council during the PSPO observation exercise during the 2024 event (Appendix 12).

The Premises Licence Holder has persistently engaged in activities that amount to a public nuisance during the annual IAS event over the last three years such as obstructing a highway or public right of way, excessive noise, behaviour that endangers or disturbs the community, reckless and dangerous behaviour and creating widespread annoyance.

The event itself takes place in a 45,000 square foot marquee erected on the property without planning permission. In 2024, MSDC issued the Licence Holder with a Planning Contravention Notice (Appendix 14) and was assured that they would seek permission prior to the erection of the marquee for the 2025 event (Appendix 15). Scientology subsequently submitted an application for a Lawful Development Certificate in May 2025 (DM/25/1292), which was rejected on 25<sup>th</sup> July 2025. Construction of the marquee began in August 2025, leading to widespread disruption in the local area due to heavy goods vehicles and construction workers using Saint Hill Road to access the site for several weeks prior to the event taking place, and several weeks afterwards during the dismantling stages.

A large car park is also created by temporarily paving over several acres of the land with plastic track-way which is visible from Saint Hill Road. The total area of disturbed land amounts to over a quarter of a million square feet.

In addition, the unauthorised construction work takes place in an Area of Outstanding Natural Beauty (AONB) and has resulted in significant damage to the land and disrupts members of the public from enjoying the peaceful, rural countryside due to its scale and visibility from Standen, Gravetye Manor and local public footpaths (Appendix 16).

Intervention from the planning authority has not prevented this persistent problem, which creates a public nuisance, and thus justifies a review of the Premises Licence so as to consider implementing a restriction on such large-scale events from taking place on the property.

Media coverage of the 2025 event includes complaints from local residents describing the “disruption” and “chaos caused by the event, and references loud, repetitive bagpipe music played by the Premises Licence Holder over loud speakers pointing at Saint Hill Road. This was noted by Council officers during the PSPO process and is described as “excessively loud” and something that “could cause a public nuisance and confusion” in section 4 of Appendix 5. Although in 2024 the volume was reduced after a request from Sussex Police, it was subsequently turned up again moments later and persisted across all three days, as well as in 2025.

The public nuisance starts at the construction of the marquee itself, not just the event weekend and as such, results in a persistent and ongoing disruption to the locality. This restricts the ability of members of the public to enjoy the countryside due to loud and intrusive noise, heavy goods vehicles and congestion from the thousands of cars that arrive at the property during a short space of time for the IAS event.

Although it may be argued disruption caused by the unauthorised construction work is a matter for the planning department, it is important to consider that it only occurs as a result of the event as the marquee is built to facilitate and host the IAS event. It is therefore a direct consequence of the event, which is currently permitted under the Premises Licence and should therefore be a matter for the Licensing Authority to consider.

Under sections 5.8 and 8.4 of the MSDC Licensing Policy, these factors – including traffic generation, near-misses and congestion must be considered as they only occur as a result of the large-scale event and not from every-day use or smaller events at the property.

For the last three years, Tom Cruise has arrived at the property via helicopter and the event has generated a substantial increase in congestion on local roads - leading to a car accident at Saint Hill Green in 2025. As far as I can see, the operating schedule does not include any conditions related specifically to the disruption this large event causes to the local community. It does not, for example, place any conditions related to traffic management, road safety or lighting near the entrances other than requiring an event management plan to be submitted in advance.

Section 5.7 states “Larger or high-risk outdoor events or events which are deemed unusual in nature will be expected to have met with, and sought the advice of, the multi-agency Safety Advisory Group (SAG) so that the safety and control of the event can be planned several months in advance. The Licensing Authority will assist with advice and guidance.” This event, which Scientology claims draws thousands of attendees from across the world, has to date escaped the scrutiny it requires and therefore public nuisance has become a persistent issue. Due to its scale both in geographic size and attendance numbers, the event should be considered a “larger or high risk outdoor event” and/or an “event which is deemed unusual in nature” and should therefore be subject to consultation with the Safety Advisory Group. Due to Scientology’s failure to provide adequate notice, they are in breach of this section of the licensing policy which stipulates “safety and control of the event” should be “planned several months in advance.”

It is clear to local residents and the authorities that this event puts extraordinary strain on public services, creates severe disruption to the local highways network and the impact of this event is felt throughout the local community. It is therefore not just a case of a few people being annoyed but rather a pattern of behaviour that has been found to be unacceptable and in the public interest, demonstrated by local and national media coverage.

The large IAS event creates a concentrated temporary nuisance with a high impact and requires intervention to protect the local amenity.

### **The protection of children from harm**

The Licensing Act 2003 explanatory notes states “The fourth licensing objective relates to harm to children beyond matters relating to physical safety.”

Children and vulnerable adults are put in considerable danger by attending large events at the premises. The government’s 1971 Foster Report (Appendix 17) found that the practice of Scientology is harmful to its practitioners’ mental health and in 1984 High Court Judge Lord Justice Latey ruled “Scientology is out to capture people, especially children and impressionable young people.” (Appendices 18 and 19)

Core to Scientology’s belief system is the teaching that children are immortal spiritual beings - adults stuck in small bodies - and are subjected to the same level of coercive control and ethics punishments as an adult. This results in, for example, children walking along the dark Saint Hill Road to attend the event unsupervised which was observed by Council observers in 2024, and evidenced in video footage captured in 2025. This puts children at an unnecessary risk of harm, and adequate measures are not put in place to minimise this such as lighting around the entrance. Conversely, the Premises Licence Holder placed obstructions in the form of planters, hedging and hoarding along the Highway which forced pedestrians – including children – to walk in the road among oncoming traffic. No hi-vis jackets or lighting was provided and WSCC Highways had to implement an emergency TTRO reducing the speed limit to 40mph to reduce the danger this created. This means the licensing objective has not been met and justifies intervention to minimise harm.

There are currently no provisions in place to protect vulnerable people from harm at the Church of Scientology. During the Independent Inquiry on Child Sexual Abuse, the Church admitted to knowledge of several instances of child sex abuse within its UK premises (Appendix 20), however there is no evidence to suggest these have been reported or handled appropriately. For example, Scientology doctrine forbids members from reporting crimes to law enforcement, and members face expulsion and excommunication for doing so. Although the Church may have submitted some form of policy to tick the box in regard to protecting vulnerable people, in practice this is not applied and those who have been the victim of crime at Saint Hill are punished for seeking help or reporting the incident to the authorities. The licence holder therefore falls short of its duties to protect children and vulnerable people on the premises.

Similarly, Scientology doctrine stipulates that people with disabilities are “degraded beings” and as such, may



require additional measures to protect them from harm - particularly coercive control - and there is no provision in the Premises Licence conditions to ensure this occurs at the property. The Serious Crime Act 2015 made coercive control an offence, and given Scientology's well documented practice of hard sales and international convictions for fraud, I believe it would be appropriate to ensure measures are implemented to safeguard vulnerable adults from abuse on the property, especially during large money-making activities such as the IAS event.

### **Proposed measures**

There is a clear public interest in this matter, as evidenced by the international media coverage of Scientology's activities at their UK headquarters at Saint Hill. There is also significant evidence of growing concern among local residents over the disruption, chaos and interference large-scale events at the property cause, and attempts to engage with the licence holder to remedy these concerns have been ongoing for three years, to no avail.

It is therefore necessary and justified for the Licensing Authority to intervene through a review of the Premises Licence. A review allows the Church of Scientology to make their case and for a reasonable resolution to be sought, rather than to punish them or prevent events from taking place all together. This is therefore a fair way of working together to minimise disruption, mitigate harm and ensure the Licence Holder meets the licensing objectives.

I am not seeking to restrict or prevent smaller events from taking place on the property, for example community/charity events, bonfire night, Christmas light switch-on and Summer Time Swing concert. My concerns relate exclusively to the large annual IAS event which draws thousands of attendees to the area, where the impact on the community is significantly greater.

My proposal therefore is that the Premises Licence is amended, or conditions implemented that prevent large gatherings (exceeding 1,000 attendees) from taking place on the property. Should Scientology wish to hold a larger-scale event, I propose that they are required to submit a Temporary Events Notice. This would allow the authorities to undergo the required due processes needed in order to assess potential harms, ensure the licensing objectives are met, and minimise disruption to the local community.

The current Premises Licence allows the Licence Holder to hold events that place immense pressure and stress on limited Council resources, blue light services and the Highways authority, coming at a significant cost to the taxpayer.

Several attempts by the relevant authorities to intervene over the last three years have resulted in no change to the impact this event causes on the local area and as such, a review is justified and necessary, and I believe has the potential to resolve these issues.

Please tick ✓ yes

Have you made an application for review relating to the premises before

☐

If yes please state the date of that application

Day		Month		Year			
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

**If you have made representations before relating to the premises please state what they were and when you made them**

Please tick ✓ yes

- I have sent copies of this form and enclosures to the Responsible Authorities and the Premises Licence holder or Club holding the Club Premises Certificate, as appropriate
- I understand that if I do not comply with the above requirements my application will be rejected

✓
✓

**IT IS AN OFFENCE, LIABLE ON CONVICTION TO A FINE UP TO LEVEL 5 ON THE STANDARD SCALE, UNDER SECTION 158 OF THE LICENSING ACT 2003 TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION.**

### Part 3 – Signatures (please read guidance note 4)

**Signature of applicant or applicant's Solicitor or other duly authorised agent** (please read guidance note 5 . If si nin on behalf of the applicant please state in what capacity.

Signature



Date 9<sup>th</sup> December 2025

Capacity .....

**Contact name (where not previously given) and postal address for correspondence associated with this application** (please read guidance note 6)

**Post town**

**Post code**

**Telephone number (if any)**

**If you would prefer us to correspond with you by e-mail your e-mail address (optional)**

### Notes for Guidance

1. A Responsible Authority includes the local police, fire and rescue authority and other statutory bodies which exercise specific functions in the local area.
2. The ground(s) for review must be based on one of the licensing objectives.
3. Please list any additional information or details for example dates of problems which are included in the grounds for review if available.
4. The application form must be signed.
5. An applicant's agent (for example Solicitor) may sign the form on their behalf provided that they have actual authority to do so.
6. This is the address which we shall use to correspond with you about this application.