

**Application by Highways England for an Order Granting Development Consent
for the A303 Amesbury to Berwick Down
The Examining Authority's Second Written Questions and requests for information (ExQ2)**

Deadline 6 Question No.2.9 page 107 (by 26 July 2019) *“During the hearings concern was expressed that the noise effects from A360 and new Longbarrow junction would result in additional noise impacts on nearby archaeology/ monuments/ places of cultural/spiritual significance. The sound profiles that have been provided (Fig 9.4 and 2026 Do Something Noise Levels) show a limited field of increased noise extending from the western portals and in the area of the new Longbarrow junction. **Do you consider this shows an improvement over the current situation and will improve the tranquillity of the WHS, thus improving the opportunity for quiet contemplation/ enjoyment of the landscape?”***

////////////////////

I am Lois Lloyd, an Archdruid of the Astronumerical Druid Order and of Sacred Grove Western Isles. I also speak on behalf of the pressure group Open Access +to Stonehenge

I'm addressing the effects this project will have in respect of the Tranquillity of the Stonehenge landscape for the Stonehenge Community of pilgrims and public who regularly attend for contemplative meditations; ceremonial or festive gatherings at Stonehenge; planned or spontaneous quiet individual restorative enjoyment and relaxation.

We can only address how the whole scheme will affect our tranquillity and not just in relation to a few decibels here or there but respectfully ask the ExA to take into account for the purposes of protecting the monument, for equitable access and as stewards of our sacred temple, we are against approval of the scheme in its entirety.

Therefore, our lack of tranquillity will be compounded by on the one hand losing surface traffic which will trigger a TRO on all BOATs decimating equitable access and the other hand losing the free iconic view! How can that be a tranquil option aiding quiet contemplation when many cannot get even there under the proposed remits? Salisbury bypass and the A303 left for local usage and BOATs left ungated with full public amenity in place, would improve tranquillity and equitable access for many.

Tranquillity

We can all describe what we subjectively consider is tranquillity. We may recourse to poetic and emotional descriptions which some may find inadequate in the face of technical and scientific assessment but it is encouraging that the UK Government agrees the concept needs description regarding planning and building projects and I quote a few below:

- 1. Natural England Guidance for assessing landscapes for designation** [AONB or National Park] indicates the criteria to be considered to encourage public access into areas having 'relative tranquillity and relative wildness'

“Table 4 Factors related to Opportunities for Open-Air Recreation in National Parks

The area must be able to deliver a markedly superior recreational experience. This is an overall assessment, to which amongst others the following factors can contribute:

Access to high quality landscapes: the presence of natural beauty and in particular **relative tranquillity and relative wildness.** There is no particular type of natural beauty that is more suitable for recreation in National Parks. Weight should be given to accessibility from centres of population”

2. National Planning Policy Framework - Guidance 15 – Conserving and Enhancing the natural Environment.

180. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (*including cumulative effects*) **of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.** In doing so they should:

“(a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;

(b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and

(c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. “ <https://www.gov.uk/guidance/national-planning-policy-framework/15-conserving-and-enhancing-the-natural-environment>

3. A simple pertinent government criteria quoted, with other quotes of equal standing, by Clive Bentley [Sharps Redmore Reference: A303 / Stonehenge Project No: 1918808 Date: 9th July 2019, page 2] serves very well to **explain what tranquillity** is for many:

*“Technical note Re: A303 Stonehenge tunnel scheme: Written summary of oral submissions in relation to tranquillity on 12th June 2019: This note summarises notes concerning the assessment of tranquillity made by myself, Clive Bentley, on behalf of the Stonehenge Alliance and by the applicant at the Issue Specific Hearing on Noise and Vibration, Health and Wellbeing held on Wednesday 12 June 2019:Government’s website, “GOV.UK” **Natural beauty assessment criteria for National Parks and Areas of Outstanding Natural Beauty describes relative tranquillity as being found where:***

“... natural sounds, such as streams or birdsong are predominant”.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-001280-Stonehenge%20Alliance%20late%20submission.pdf>

Noise, Vibration, Lights Affecting Tranquillity

- surrounding landscape

In effect the completed scheme will change these qualitative effects but who knows whether its an improvement as it cannot be compared as they will be concentrated in portals in a different direction with variables of which we are, at this point, unaware. Any visible or audible concentration of a recognised nuisance viewed or heard from the Stonehenge itself particularly will be insufferable for those meditating or conducting ceremonies or observing the skies in astrophysical research.

- generated within the tunnel

Vibration and noise nuisance will be dependent upon:

- type of fans used since they are known to create their own noise both at portals or vent shafts which again will be different at night due to weather acoustics and speed of fans and quality of silencers;
- effectiveness of sound dampening tunnel lining and road surfacing.

We can only hope monitoring of crucial acoustic effects will be diligent and constant. The ongoing nuisances generated during construction will of course be another matter!

Lighting pollution

This has been a constant source of anxiety and Objecting submissions regarding both portals and particularly at Longbarrow and Normanton, yet little has been said or promised to allay those concerns.

Weather effects

There are also many situational and weather related effects, especially fog, low cloud, excessive heat, water and wind effects on which we have had no clear information whatsoever that is discernible to the untrained person, so we cannot make a scientific judgment only a perceived or pre experienced consideration and wide knowledge of the landscape and I address this lack of information later on.

Sacred contemplation, ceremonial and astrophysical observational needs

Impact of Noise, Lighting, Vibration and Disturbance of Tranquillity of sacred ambience and interaction on sensitive perception levels

Many submissions have quoted the portals and fast-moving traffic noise and light pollution in relation to these issues. We agree with those and in an effort not to repeat what we have already submitted we now present particular concerns relating to the following concepts in relation to a quiet sacred landscape that we do now, without a tunnel, enjoy and wish to retain for ALL people. Especially with a mind to those who cannot walk miles nor afford to pay for parking of nearly £20: often the stress and cost of travelling for miles on pilgrimage put those who are impecunious at a distinct and unnecessary disadvantage.

We would respectfully request the ExA consider also how the surrounding landscape and its visitors, pilgrims, inhabitants etc may suffer at levels that range from *physical audio and optical disturbance via acute sensitivity and awareness especially during times of contemplation, ceremonial and sacred meditation, due to concentrated traffic noise and lighting at portals and other effects from immense disturbance of the ground and ancestral remains that would cause loss of **tranquillity peace and harmony and loss of full public amenity in the sacred area of the WHS.*** These situations include:

1. across the Earth surface, beneath and above: the breaking of ley energy lines, the loss of continuity of emotional and physical pathways, which countless generations have walked, sat and shared knowledge and stories on, built unknown numbers of structures for the living and the dead, lived beside the mystical burials and carried out the endless astrophysical study of the Stones that we, their descendants are meant to guard, continue and nurture;
2. great depths: the cataclysmic destructive upheaval of the surface and substratum in a uniquely ancient highly evolved, continuously inhabited and Sacred landscape;
3. ancient waterways: which have protected the indigenous and transient ancient peoples and their artefacts/memories/sites/remains which they left with us in our care;
4. sky and elementals: interference in the ability to continue the conduct of the millennia old research, study and observations of day and night sky.
5. Non human interactions: the creatures that share the sacred landscape with us will also become greatly confused by the land disturbance and loss of their tranquillity; the hares, hedgehogs, deer, bats and other wandering creatures will become disorientated and the endangered ones will certainly not be conserved as we saw with recent fencing and disturbance of the roads, permissive pathways being moved and noise from construction near the Stones; we rely on their presence enhancing our understanding and connection with the

sacred landscape, their distress is ours, we are their stewards, we must protect their tranquillity and safety.

6. Human Sacred interactions: loss of harmony, energy connections and tranquillity will affect and inhibit peaceful enjoyment of communing in a sacred manner and expressing reverence, respect and honouring of Higher Spirits and ancestors, shamanic and meditational interactions with ancestral memories and sacred ceremonial gatherings, sharing with fellow pilgrims and inspiring others to take care of and protect the temple monument and surround landscape,

Ability to respond effectively on original Public consultation

The difficulties of supplying the ExA with accurate, effective responses are more pronounced as we progress in the Hearings on specifics such as Noise and Tranquillity.

The public consultation was very restricted in terms of information, drawings, impact assessments and projections in the form of technical CAD or videos to assist in making credible informed criticisms or suggestions. These aspects indicate the probability of a judicial review and the more we continue discovering vital information we didn't know at the start, the more likely a JR becomes; especially as even the ExA is still asking for basic clarifications on drawings etc

This unknown cumulative qualitative effect is best described by Clive Bentley in his report above in para 2 "***It is therefore evident that no consideration of natural and man-made sound has been made, and sound has not been properly considered, contrary to relevant planning policy and guidance***"

If these essentials are still being a mystery to those who are professional, how on earth can the average member of the public be expected to take part in a Consultation which did not mention them and subsequently even at the Hearings are still being discovered? From attendances at Issue Specific Hearings and Oral Hearings it is strongly evident that basic local concerns regarding *noise, pollution, wellbeing and tranquillity* in relation to livestock, livery stables, landscape and humans seem to be barely quantified and more assumptions made than accuracy of qualitative investigations.

If this was a legal application in court, the idea of this level of non-Disclosure of pertinent and vital evidence would be a Contempt. It certainly is of those who did their best in the Consultation periods to address the questions, but mostly blindfolded and many unlike those of us who are Registered to keep taking part, are still utterly unaware of what they missed and were not told about!

We have had the recent Wiltshire Council attempt at a late addition of their own to the Application in the shape of a Traffic Regulatory Order affecting the whole WHS: will there be more additions?

In effect the public have not had full capacity to respond effectively and certainly not since the subsequent alterations, reassessments and extra evidence that has evolved during the Hearings.

The progression of the in-depth examinations by the ExA which are impressive in their quality and care, only serve to raise the issue of Re-consultation on the new discoveries as the Inquiry in Public progresses.

We respectfully ask the ExA to take account of the feelings and fears of future nuisances and issues coming to light before and even after the project is finalised; there will be subsequent piecemeal complaints, legal and archaeological and scientific combined with complaints of local people and those who frequent the landscape regularly. **Lois Lloyd, an Archdruid of the Astronumerical Druid Order & Sacred Grove Western Isles**