

**From:** [REDACTED]  
**To:** [Emma Holliday](#); [Sarah Marshall](#)  
**Cc:** [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [A303 Stonehenge](#); [Richard Price](#); [Jane Scott](#); [trafficorders@wiltshire.gov.uk](mailto:trafficorders@wiltshire.gov.uk); [philip.whitehead@wiltshire.gov.uk](mailto:philip.whitehead@wiltshire.gov.uk); [bridget.wayman@wiltshire.gov.uk](mailto:bridget.wayman@wiltshire.gov.uk)  
**Subject:** Reply to Letter of Claim/ Ref EHO/ 120286  
**Date:** 12 August 2019 12:22:07  
**Attachments:** [Wiltshire Council 12th August 2019.docx](#)

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WITHOUT PREJUDICE

So we are clear, I intend to copy this document to other interested parties in this matter including but not exclusively;

Rollo Maughfling Arch Druid Stonehenge,  
John Glen MP Salisbury,  
The Examination Authority for the Proposed 'Stonehenge Tunnel',  
Wiltshire Council Cabinet Office.

Interested parties, Interested I venture, in seeing the lengths Wiltshire Councils Legal Dept.' are prepared to go to, in order to bring an end to my challenging their many and continued attempts to restrict traffic on AMES 11 and 12 over the years.

Please find attached e copy of Response to Letter of claim, Hard copy delivered by hand to Bourne Hill Salisbury

Arthur /\  
King Arthur Pendragon

# King Arthur Pendragon

Titular Head and Chosen Chief

Loyal Arthurian Warbands

L / \ W

[www.warband.org.uk](http://www.warband.org.uk)

[https://twitter.com/Stonehenge\\_King](https://twitter.com/Stonehenge_King)

O=={{:12th August 2019:}}>

Ref Wiltshire Council

LETTER OF CLAIM

For £1,750

## **WITHOUT PREJUDICE**

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Interested parties, Interested I venture, in seeing the lengths Wiltshire Councils Legal Dept' are prepared to go to, in order to bring an end to my challenging their many and continued attempts to restrict traffic on AMES 11 and 12 over the years.

Reasons why I should not be liable for the full/and or amount due.

I realise that 'Rules is rules' and That one is expected to 'render unto Ceasar...' and that in a very real sense you feel that you must have and are entitled to, "your pound of Flesh", but I shall set out here the reasons why I dispute this assertion and challenge this claim, in both a legal and Moral way.

It may be the case as outlined in your claim that I am legally liable in part for a proportion of, or the full amount claimed, or it may not.

Be that as it may,

It is surely not legally and morally right that you should profit from what was and has been held by a court to be an illegal act.

But let's not take my word for it, let's look to yours.

The way you tell it, to the Stonehenge Tunnel Examination Authority:

And I quote here from your written response to my opposition to your application to restrict vehicular access on By-ways Ames 11 and 12,

"In so far as the TRF v WC 2018 case is concerned (Trail Riders Fellowship v Wiltshire Council 2018 EWHC 3600), the court found in that case that the Council had in error not fully complied with the 1996 regulations so far as appropriate pre-consultation was concerned. "

Which is now, I would submit being compounded by once again The Council and their legal Dept's total Lack of consultation in this matter, prior to the application made to The Examination Authority.

It appears to me that Wiltshire Council are determined, to push this through, one way or another mostly without consultation, or as they admitted in the court case mentioned above, they may have forgotten the Highways agency and other statutory bodies but, they did mention it to the police at the weekly Novochock meeting.

It is my submission that these casual mentions 'as an aside' are not properly to be viewed as consultation whatsoever and where the greater general Public or the Druid and Pagan community who have a special interest are concerned, simply do not occur.

Be that as it may.

## **BACKGROUND**

In 2011 There was a Non statutory Public Inquiry where I opposed Wiltshire's application to close AMES 11/12 to Vehicular traffic, on this occasion they Wiltshire were unsuccessful.

In 2018 The Council enacted a so called temporary, Experimental Traffic Restriction Order prohibiting traffic on the By-way Open to all Traffic (Ames 12) adjacent to Stonehenge, which denied me the use of Amenity.

I challenged this Order and having 'lost' my application for Judicial review, was ordered to pay the sum in question to the defendant for the preparation of legal documents.

The TRF Trials Riders Fellowship, also challenged the Order, and with the aid of Barristers and a legal team, were successful, proving the Order to be illegal

for several reasons not least of which was the lack of mandatory consultation with interested parties. So again Wiltshire were unsuccessful.

One of my arguments, should I have been granted (as the TRF were) a Judicial Review was to have been this very same lack of consultation and I would have pointed out, as I do here, and have done previously at the Non Statutory Public Inquiry held by Wiltshire Council in 2011 that The Druids, and as Wiltshire Council are most assuredly aware, King Arthur and his Order in particular, are regarded as Stakeholders at Stonehenge by UNESCO. And I venture, here and elsewhere, should therefore, have been consulted.

The question now, is why should I be expected to pay you to defend the indefensible and where is the Natural Justice in your pursuance of this claim?

It is not as if you do not have the benefit of hindsight, some seven months have passed uneventfully since the order was made, and I responded immediately with an explanation of my intent to find a mutually beneficial outcome to this situation.

(See attached Doc 1).

A cynic might think, as do I, that you waited until now, to pursue this what can only be viewed as a vindictive claim, because it is only now, that you are raising the specter once again of restricting Traffic within the whole of the World Heritage site by way of an application before the Tunnel Examination Authority that I am opposing.

This is fact.

\* documentation, all of which is a matter of record on the ExA web site. The ExA may be contacted/and or/found at;

Temple Quay House, Temple Quay, Bristol BS1 6PN

Direct Line: 0303 444 5654

Helpline: 0303 444 5000

Email: [richard.price@planninginspectorate.gov.uk](mailto:richard.price@planninginspectorate.gov.uk)

Web: <https://infrastructure.planninginspectorate.gov.uk/> (National Infrastructure Planning)

Web: [www.gov.uk/government/organisations/planning-inspectorate](http://www.gov.uk/government/organisations/planning-inspectorate) (The Planning Inspectorate)

Twitter: @PINSgov

That then, is the Background to Wiltshire's Letter of Claim and my reasoning as to why I feel aggrieved at their insistence that I make payment in full.

Let us turn now to answering the standard reply form as furnished to me;

## **REPLY FORM**

### **BOX A**

#### **I AGREE I OWE THE DEBT**

I contest that, in the light of the TRF's ruling, the Judge finding in favor of the TRF and against the Council in this matter, that the original order signed and dated 3rd Dec 2018 is still valid, as being such would enable Wiltshire Council to profit from what has subsequently been proved to be an illegal act.

## **BOX B**

### **I OWE SOME OF THE DEBT, BUT NOT ALL OF IT**

Notwithstanding the above.

Should you desire that I have a legal obligation to pay some of the costs awarded against me, and taking into account my somewhat special financial circumstances,

see;

Doc 2

STATEMENT OF FINANCIAL MEANS

IMPECUNIOUS MENDICANT.

I am sure we may come to an arrangement whereby I provide a service to the Council for payment in kind. As it is in neither parties interest to take this claim back to court and accrue even more costs in a vain attempt to get 'Blood out of a stone' simply because you can.

You will be aware that under the terms of the Pre-Action Protocol for Debt Claims, a further 30 days is available to both parties to discuss this offer prior to any further (Court) action being instigated on your part.

## **BOX C**

### **I DON'T KNOW WHETHER I OWE THE DEBT**

I am of the opinion that this is open to interpretation as for the reasons given in this and related documents I am not sure as to my liability.

## **BOX D**

### **I DISPUTE THE DEBT**

I dispute the legitimacy of the debt because the original Order by Wiltshire Council was later found to be illegal, and had I have been granted 'my day in court' as The TRF were, it is likely that Wiltshire would have been ordered to pay my cost not visa-versa.

Even, had the Judge ruled against any argument submitted on my part due to lack of consultation, it stands to reason that it would have, opened up the very same 'can of worms' that led to the TRF's victory, which was held that LARA, Highways, and other statutory consultees (not the TRF themselves) were not consulted.

And, as I did not employ the services of solicitor or Counsel they would not now have had to come out of the public purse. In light of all this, I feel therefore the 'right' thing to do, given the circumstances laid out in this missive and supporting documents would be for, common sense to prevail and Wiltshire to graciously 'write off' the debt.

## **BOX E**

### **I WILL PAY WHAT I OWE NOW**

I intend to pay what is considered owed but I am in dispute as to both the amount and liability.

## **BOX F**

### **I WILL PAY BUT I NEED TIME TO PAY**

If it is deemed that I am liable for all or part of the amount claimed I will need time to pay/and or/ make alternative arrangements as per my somewhat unique financial status as an Impecunious Mendicant.

## **BOX G**

### **I AM GETTING OR INTEND TO GET DEBT ADVICE**

Should it become necessary, I reserve the right to seek such advise.

## **BOX H**

### **I HAVE PROVIDED DOCUMENTS OR INFORMATION**

#### List of Documents

- 1 Original Response
- 2 Statement of means,  
Impecunious Mendicant  
(Signed with Hard Copy)
- 3 Reply form (Signed with Hard cory)

## **BOX I**

### **I NEED MORE DOCUMENTS OR INFORMATION**

The only additional information I require is a letter from the claimant explaining how we proceed from here without any further court proceedings .....

**DOCUMENT 1**

**ORIGINAL RESPONSE**

O=={{:.....:5th December 2018:.....:>

Sarah Marshall,

Legal Services

Wiltshire Council

By e mail/ and Hand delivery

Bourne Hill Office Salisbury

Hail Sarah,

I have before me a Court Order dated 3rd December in The Year of The Profit Jesus Christ of Nazareth Two Thousand and eighteen, known as 2018 in the common era.

It is my understanding that you have received a copy of this Order by Karen Stryn QC, sitting as a High Court Judge in The High Court of Justice, Queen's Bench Division of The Administrative Court.

In which;

It is Ordered that I pay you (Wiltshire Council the defendant) the sum of One Thousand, Seven hundred and fifty pounds costs for preparing the Acknowledgement of Service.

I note the Precedent as set out in point/para three of the Order;

And see in point/Para' 4 that although the Judge does not disagree with any of my points that there is to be no merit attached to such points in this matter;

Be that as it may, it remains the case , that I have;

1 With a view to the public purse, should I have been successful, kept my costs to a minimum.

2 Taken this action in what I believed (and still do) was in the Public interest,

3 As a private citizen of Wiltshire, paid into the very public purse from which these costs were paid, as I pay my Community charge directly to the aforementioned Defendant

4 And lastly, but my no means of any lesser import' or validity I am an Impecunious Mendicant and have neither income nor Savings.

I realize that; 'Shylock' must however have his pound of flesh and that I must render up unto Caesar that which is Caesar's, but I would ask that we came to some kind of arrangement whereby it is paid 'in kind'.

I am sure that there must be some community work or project in the fair Shire of Wilt' that I could undertake on behalf of Wiltshire Council in Lou of any such payment and that the Council and I can find a way around this problem that is both creative and beneficial for both parties.

I look forward to hearing your thoughts and that of the Council on this matter.

Blessings and Seasons Greetings to you all.

Arthur /\

King Arthur Pendragon

Senior Druid

Proposed Independent Parliamentary Candidate Salisbury

cc

Rollo Maughfling Arch Druid

## **DOCUMENT 2**

### **STATEMENT OF MEANS**

I am an impecunious mendicant and have neither personal Income or Savings and rely solely on the charity of my 'Faith' community for my sustenance.

AND THIS FROM THE WORLD WIDE WEB;

"When I changed my name and embarked upon this quest 11th June 1986. I decided that if it was meant to be, the Goddess would provide and the 'Magic' would sustain me. Later at Newbury and on other campaigns I was glad of it and would not give Thatcher and her Government the satisfaction of likening me to 'a medieval brigand' as did her minister or leveling the charge or assertion that I was a 'a dole scrounger or benefit cheat' No I have steadfastly refused to sign on and claim unemployment benefit as I believe I am fully employed in what I do. Nor do I claim any sickness benefit from the state, nor do I, as others have claimed have an Army pension. "

Officially I am an Impecunious Mendicant which means I rely solely on the charity of my 'religious' community to sustain me and have neither income nor savings....."

This is a True Statement of facts

Arthur /\

King Arthur Pendragon

Note,

A signed copy of this statement and 'Hard copy' of supporting documents will be delivered by hand, to the Bourne Hill office of Wiltshire Council prior to/and as well as the electronic copy being posted by email