

28 September 2020

Natasha Kopala
Head of Transport Infrastructure Planning Unit
Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

c/o The Planning Inspectorate
your ref: TR010025

Dear Natasha Kopala,

Subject: Comments on representations received in response to the secretary of state's consultation letter of 16 July 2020

Please find below my comments. I will be pleased to provide further information and/or clarifications if required.

R P Bartosz,
Interested Party

The Model:

STONEHENGE (*the monument*), THE FOREMOST PROTO-CHRISTIAN "CATHEDRAL" IN ITS CHURCHYARD (*its landscape setting*).

THIS MODEL, as far as I understand, is PROTECTED BY EXISTING LEGISLATION, SEE PARAGRAPH 11) ONWARD.

A Prophetic Video

1) I would like to set the scene by referring you to a short video (*15 minutes*) supported by English Heritage. It is titled "**Stonehenge 3019**" and viewable on Youtube at:
<https://www.youtube.com/watch?v=CNIZaCjMrfw&feature=youtu.be>

2) @3 minutes 5 seconds: "*Still can't work out why Stonehenge was built in the first place. History is dark.*"

My comment - **this will be the case because the current application is 'ARTEFACT-LED' and not 'MODEL-LED'.**

@ 4 minutes 20 seconds: "*2019 is the furthest back you can go on the current settings.*"

My comment - **this is because, according to the model, the current proposal is a dramatic conflict between the prehistoric use of the defined extent of WHS landscape and the tunnel proposal, as it stands, within the same landscape setting.**

THE HISTORICAL TIMELINE WILL BE RESET TO ZERO.

@ 10 minutes 5 seconds: "*This is no longer a carefully curated experience.*"

My comment - **I suggest that it will become a carefully managed commodity. I can see no convincing evidence to the contrary.**

Model Validity:

3) At this point I would briefly refer to my background experience in the context of the submission *ref. TR010025-001967, Mike Pitts*. I regret that I have to take his comments as being heavily toned with arrogance towards parties submitting representations, such as me. He claims that he is not a "Stonehenge expert". Nor am I, but by default therefore, one doesn't have to be to make positive contributions to the development decision making process.

4) What I can offer is a working lifetime of experience in dealing with development proposals as an internal advisor, in various local authority settings, on matters of landscape and countryside policies and implementation, including landscape impact assessment. In my last employment I undertook assessments for all of the sites, and presented evidence at the corresponding Examination In Public, leading to the County's Minerals Local Plan 1996-2006. Equally, it was my responsibility to liaise and report back to senior officers, archaeology colleagues and committees on various highways proposals, including one finally given the "go-ahead" by Chancellor Rishi Sunak in the same statement as this tunnel proposal.

5) Throughout, my landscape assessments have focused particular attention to landscape setting and the "model" criteria operating, upon which crucial decisions had to be made. For the most part these criteria involved issues relating to visual landscape and ecology (*or biodiversity, as now more popularly referred to since the Rio Earth Summit in 1992*). Now in retirement and having studied archaeoastronomy since 2006, firstly as a hobby and currently effectively as an unpaid second career, my attention turned to Stonehenge very early on. To cut a long story short, I found that the monument and its setting represented, from a professional point of view, a **model without parallel to any I had experienced before**.

6) As my personal research progressed I discovered, with no hesitation relating to my role as having designed many landscape schemes, that the Stonehenge model as above is a deliberate design involving many aspects of geometry, astronomy, metrology and mathematical ingenuity which remain dismissed within any strategy formulated by the respective agencies charged with both protecting and advancing the Outstanding Universal Value of this WHS. For this reason, I felt obliged to put myself forward as an 'Interested Party'. Consequently I submitted representations illustrating the very least of the Model's qualities:

a) in my main written representation, the minimum extent of the "sacred" area of the ceremonial landscape: (*written representation-TR010025-000904, and summary-TR010025-000905**), within which the tunnel proposal fully resides, and

b) in my oral presentation I broached the issue of the **dual function** of the monument and its landscape, **in essence being not just a one-way journey from the land of the living to that of the ancestors on death, but equally a journey, on the birth of an individual, (almost certainly belonging to an elite family) from presentation of the new life to the**

ancestors to the community in the land of the living: (transcript-TR010025-001066 and image-TR010025-001065*)

(* On my computer these show at Page 11 of the "Additional Submissions" documents section.)

7) It appeared to me that my representations, at that time without the model description, would be more than sufficient, with respect to the Examination Panel, to raise the questions as to the extent of the setting which should or should not be subject to development. This, potentially of any kind of development yet alone the tunnel proposal. Since the Panel's recommendations remain confidential, I will not know the outcome until a decision is declared on the 13th November.

8) I have considerable further evidence to support the model. However, since much of it is subject to ongoing research to fill certain voids, I am not prepared at this stage to reveal details. In any case to understand these, which are multidisciplinary, would require further written evidence in conjunction with a presentation, probably of at least an hour. On occasion I have tentatively suggested, in dialogue with various scholars, that unpublished details of research might be supplied, but without success. I understand this, but equally, I too retain the privilege of keeping my research confidential.

9) In terms of my comments here I believe I need only to highlight, briefly, responses to the secretary of state's consultation 2, that echo the principles of my submissions or jar with them.

i) **Mr. Simon Banton**, (ref. TR010025-001965):

Of all the submissions Mr. Banton, in his analysis and video of the "journey" from "life to death" shares the vision that I have, and that it comes from a fellow independent researcher is welcoming. However, as earlier described, I go further by adding the dual function of the journey in the opposite direction. And, even furthermore, my analysis of the design principles effectively shows that the junction between the solstice alignments at the elbow to the Avenue is at a quite deliberate distance from the centre of the Stonehenge's stone monument.

ii) **Consortium of archaeologists and Blick Mead Project Team**, (ref. TR010025-001991)

This long submission can be summarised, in the context of my comments here, in one phrase - "**Unity of the Landscape**". It is full of pointed argument surrounding the "artefact" elements, which I should clarify that I am not against. What is missing, however, is the "model" element as presented here. Our respective viewpoints are therefore entirely complementary.

iii) **ICOMOS UK**, (ref. TR010025-001984):

Entirely complementary to the "model-led" approach, with specific forceful comments regarding the inter-relationships between monuments and sites, the scale of the undertakings, and the folly of interpreting the collection of pre-historic monuments as interspersed by blank spaces open to development.

iv) **Council for British Archaeology**, (ref. TR010025-001973):

Lastly, but by no means least, the recognition of the potential, or real, far reaching wider implications of both cumulative development harm already suffered, and certainly, in my

opinion, the harm of the precedent of the tunnel to proposals affecting World Heritage Sites elsewhere. In particular, I entirely agree that there are many examples of increasingly insightful interpretations which challenge old assumptions and promote research-led archaeology. However, I would use my position as literally having nothing to lose, to be somewhat more pointed in that I believe that much of archaeology is regrettably still stuck in the rut of the paradigm of linear evolution, and erroneous interpretations of our ancestors possessing only limited knowledge and capability.

10) As regards the point of jarring with the model-led approach, I can only offer one conclusion - shortsighted. From the point of view of a landscape professional, a pertinent example has to be targeted at the National Trust. The Trust, the largest landowner in the UK, boasts being responsible for some 18 Lancelot "Capability" Brown landscapes. I'm sorry, but if the National Trust does not understand, or is willing to trade, existing integrity and authenticity for some unproven future benefit then I am at a loss.

The Model and its Protected Status

11) In my opening statement I indicated that I believed the model of a proto-Christian cathedral is protected. I understand this to be the case because English Heritage both allows and presides over ceremonial use of the monument at specific times of the year, namely solstices and equinoxes. Therefore, as an active site of worship, the monument and its landscape - or "ancient churchyard" - has to be assumed as consecrated ground, irrespective of ownership, unless proved otherwise. Those who wish to use it for worship, therefore, have the right to expect its management and use to comply fully with their religious/spiritual beliefs, in short the whole of the landscape.

12) The law regarding consecration is complicated and it remains one of the challenging aspects of my research into the extent of the area which may be regarded as covered by protection. Whereas the current ceremonial use is generally regarded as "pagan" (druidry) there has been a growing move away from traditional Abrahamism to, at the least, paganism and extending to spiritual atheism. The potential for expansion of these and other beliefs and, therefore, demand on the use of Stonehenge poses a serious question for future management strategy. In the case of "artefact-led" management it may be that the law does not apply. The "model-led" archaeological approach could be argued otherwise.

13) At this stage I can only highlight that my research into the design of Stonehenge and its landscape elements, appear to follow a henotheistic model with ceremonial movement and celebration tied to a holistic composite based on the elements of geometry, astronomy, metrology and number. In short, the beliefs appear to have been guided by harmony with natural phenomena, rather than any particular "god/s" as in monotheism or polytheism, and might best be described as a "one theory of everything", allowing for a range of local/tribal interpretations and practices. Further than this I don't wish to go as the suggestion is hypothetical, albeit I believe entirely valid, and subject to considerable further research which may be beyond my resources or even wishes, at this time.

14) Nevertheless, at this point I believe that the model is protected by,

Section 9 of the Human Rights Act.

i). Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief and freedom, either alone or in community with others and in public or private, to manifest his religion or belief, in worship, teaching practice and observance.

ii). Freedom to manifest one's religion or beliefs shall be subject only to such limitations as are prescribed by law and are necessary in a democratic society in the interests of public safety, for the protection of public order, health or morals, or for the protection of the rights and freedoms of others.

15) Within this right, and Stonehenge being an active ceremonial site, I would say that it is the responsibility of the managing body/bodies to fully investigate and promote the extent of the active area for religious/spiritual purposes.

Final Remarks

16) In the context of the above, I would support the contention that in the current situation the arguments in support of the tunnel proposal fall short of expected standards. In my former submissions I stated that Stonehenge should **never be subject to a point of no return**. The reason for this is that the State obligation, in signing up to World Heritage Site responsibilities, falls short of expected standards as more than adequately argued by the submissions to the Secretary of States Consultation 2. The tunnel proposal is the only option presented, and as such there is no means of judging it against a proposal wholly outwith the WHS boundary. Given this, any development proposal is open to argument by stealth to achieve a desired end. The planning legislation should be strengthened to make it mandatory, where a World Heritage Site is the subject, that a proposal outside the respective boundary should be additionally submitted.

17) Parallel with the above, a World Heritage Site should never be subject of a trade-off between development, knowingly resulting in significant destruction, and the interests of furthering archaeological knowledge.

Richard Bartosz