

Land south of the M20, Church Lane, Aldington, Kent (known as East Stour Solar Farm)  
Outline Archaeological Mitigation Strategy  
November 2024

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**Report**

Outline Archaeological Mitigation Strategy

**Site**

East Stour Solar Farm, Sellindge, Kent

**Client**

EDF Renewables

**Planning Authority**

Ashborough Borough Council

**Prepared and Approved By**

Rob Bourn BA MA MCIfA

**Report Status**

Final

**Orion Ref**

PN2968/ Mitigation Strat 1

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## 1.0 Introduction

### Project background and purpose of document

- 1.1** This archaeological mitigation strategy has been prepared by Orion Heritage Ltd., on behalf of EDF Renewables Ltd in relation to a planning application for the installation of a solar farm with a generating capacity of up to 49.9MW comprising: ground mounted solar panels, access tracks, inverter/transformers, substation, storage, spare parts and welfare cabins, underground cables and conduits, perimeter fence, CCTV equipment, temporary construction compounds and associated infrastructure and planting scheme (the “Proposed Development”) (planning application ref: 22/00668/AS). The Proposed Development is to be known as East Stour Solar Farm.
- 1.2** This document has been prepared following the refusal of planning permission, and forms part of additional information requested by Ashford Borough Council in order to resolve reason for refusal no 2 relating to archaeological remains. An outline archaeological mitigation strategy was not produced previously as neither Ashford Borough Council nor Kent County Council had requested it. The archaeological mitigation works were considered able to be secured by the use of a suitably worded planning condition requiring the applicant to secure the implementation of a programme of archaeological works in accordance with a written scheme of investigation (WSI) submitted to and approved by Kent County Council on behalf of Ashford Borough Council. The WSI would layout a detailed programme of work to be undertaken ahead of and/or during construction. The use of a planning condition would have suitably secured the required mitigation works, thereby making an outline mitigation strategy document superfluous. However, it has been produced at this stage in the spirit of co-operation with Ashford Borough Council so as to resolve reason no 2 ahead of the appeal.
- 1.3** This document outlines the scope and nature of archaeological works required to appropriately mitigate the impact of the proposed East Stour Solar Farm (Fig. 1 & 2) on archaeological remains identified during archaeological geophysical survey and trenching at Land south of the M20, hereinafter referred to as the Proposed Development site. This is not a Written Scheme of Investigation (WSI). The proposed scope of archaeological work will be secured through the use of a condition attached to the planning permission and a WSI outlining the detail of how the proposed mitigation works will be implemented will be produced and agreed with Kent County Council as the first stage of discharging the condition.
- 1.4** The results of the geophysical survey and trenching represent a systematic assessment of the proposed development area. Based on the results of these works, no further pre-determination evaluation works are considered to be necessary.

- 1.5** This document has been prepared in accordance with professional best practice, including the Universal Guidance for Archaeological Excavation, Standards for Archaeological Excavation, Universal Guidance for Archaeological Monitoring and Recording and the Standards for Archaeological Monitoring and Recording (Chartered Institute for Archaeologists 2023).

*HEDBA & Geophysical Survey*

**2.1** The combined HEDBA (submitted as Appendix 12.1 of the Environmental Statement dated April 2022 in support of the planning application) and geophysical survey (submitted as Appendix 12.2 of the Environmental Statement dated April 2022 in support of the planning application) (the HEDBA included consideration of the geophysical survey results) established that a number of archaeological interventions which were undertaken within Area 1 previously will have effectively recorded and removed potential archaeological deposits in the following areas (Figure 3 & 4):

- the location of a possible windmill mound (TRO3NE20) and residual prehistoric lithic material (TRO3NE242) from under the possible windmill mound in the centre-west of Area 1 (KHER EKE3720);
- the south-west and south-east of Area 1 have been subject to archaeological investigation (EKE5094, EKE5097 and EKE12235);
- It is also noted that the KHER records a medieval silver coin findspot (MKE55982) in the north of Area 1 that has been removed from the site; and
- Geophysical survey of the area has identified no evidence of associated features with either the find spot or the possible windmill mound.

**2.2** The geophysical survey identified the following possible and undetermined areas of archaeological interest (Fig. 5):

- [MS2a] linear and curvilinear anomalies (probable archaeology) in the centre of Area 2;
- [MS2b] linear and curvilinear anomalies (probable archaeology) in the centre of Area 2;
- [MS2c] two strong parallel linear anomalies (undetermined) in the east of Area 2;
- [MS5a] partial rectilinear enclosure measuring c. 100m wide with possible internal subdivision (probable archaeology) in the north-east of Area 5;
- [MS5b] partial enclosures (probable archaeology) in the south of Area 5;
- [MS5c] curvilinear anomaly which may represent a ring ditch (probable archaeology) in the south-east of Area 5;
- [MS5d] linear and curvilinear (probable archaeology) in the centre-east of Area 5;
- [MS5e] area of possible extraction (probable archaeology) in the centre-east of Area 5; and
- The survey recorded the location of the mid-20<sup>th</sup> century radio mast foundation in the centre of Area 5 [MS5f].

**2.3** Based on the form of the geophysical anomalies, the assessment concluded that there was high potential for prehistoric occupation evidence in the centre of Area 2 [MS2a and 2b] along with the potential for multi-phase occupation evidence in this area. The date and character of the linear anomalies of undetermined character [MS2c] in the west of Area 2 were unknown. The

report concluded that these remains were likely to be of local to regional, rather than national, heritage significance.

- 2.4** The assessment concluded that there was high potential for prehistoric – Romano-British occupation across Area 5, although it did also state that the enclosures could be medieval or later in date [MS5a and 5b]. These remains were considered likely to be of local to regional, rather than national, heritage significance.

#### *Evaluation Trenching*

- 2.5** Archaeological evaluation trenching of the Site was undertaken by Pre-Construct Archaeology in accordance with a Written Scheme of Investigation approved by Kent County Council on behalf of Ashford Borough Council. The evaluation was undertaken between 1<sup>st</sup> February and 31<sup>st</sup> March 2023 comprising the excavation of 117 30m x 2m trenches across all the proposed developable areas of the Site targeting geophysical survey anomalies and the ‘blank’ areas of the Site (Figure 6).
- 2.6** The evaluation (submitted as Appendix 12.1 of the Supplementary Environmental Information dated January 2024 in support of the planning application) has established that archaeological features were present in 43 of the trenches. Remains recorded include two possible Neolithic pits in Area 5 (Trench 124); Mid/Late Bronze Age features in Area 5 (Trenches 90 & 123); a late Bronze Age/early Iron Age ditch and pit in Area 1 and indications of contemporary activity in Area 5; focuses of Late Iron Age-early Romano British settlement activity in Areas 2 and 6 and Romano British activity in Areas 1 and 5 including two sunken feature buildings in Area 2. These findings are broadly in keeping with the results of the geophysical survey and HEDBA. The remains identified are all considered to be of local to regional significance and are not design constraints.
- 2.7** In relation to the geophysical survey results, the trenching established the following:
- [MS2a] linear and curvilinear anomalies (probable archaeology) in the centre of Area 2. Excluded from the proposed developable area so not trenched as there will be no impact on these remains.
  - [MS2b] linear and curvilinear anomalies (probable archaeology) in the centre of Area 2. Excluded from the proposed developable area so not trenched as there will be no impact on these remains.
  - [MS2c] two strong parallel linear anomalies (undetermined) in the east of Area 2. Excluded from the proposed developable area so not trenched as there will be no impact on these remains.
  - [MS5a] partial rectilinear enclosure measuring c. 100m wide with possible internal subdivision (probable archaeology) in the north-east of Area 5. The evaluation failed to identify archaeological remains associated with an enclosure in this area. A late Iron Age pit was recorded in Trench 44 but no



evidence for enclosure ditches was recorded. Trenches 42 and 43 were targeted on the enclosure ditch but no archaeological features were recorded.

- [MS5b] partial enclosures (probable archaeology) in the south of Area 5. Trenches 82 and 90 were targeted on this feature. Trench 90 revealed a large ditch and a smaller parallel ditch both of which were dated to the late Bronze Age/early Iron Age period. Colluvium containing late Iron Age/early Romano-British pottery.
- [MS5c] curvilinear anomaly which may represent a ring ditch (probable archaeology) in the south-east of Area 5. Trench 86 was targeted on this feature and failed to reveal any archaeological remains.
- [MS5d] linear and curvilinear (probable archaeology) and [MS5e] area of possible extraction (probable archaeology) in the centre-east of Area 5. Trenches 63 and 74 were targeted on these features. Trench 63 revealed a dumped deposit/possible midden of Romano-British date and trench 74 recorded a colluvium layer contained Romano-British pottery.

#### *Statement of Significance*

**2.8** The significance of the identified remains (Figure 7) is considered to be as follows:

- Two possible Neolithic pits in Area 5 (Trench 124). These are isolated features and are considered to be of local significance.
- Mid/Late Bronze Age features in Areas 1 and 5 (Trenches 6 & 123). These are considered to be of local significance.
- A late Bronze Age/early Iron Age ditch and pit in Area 1 (Trench 13) and indications of contemporary activity in Area 5 (Trenches 90 and 123). These features are considered to be of local significance.
- Focuses of Late Iron Age-early Romano British settlement activity in Areas 2 (Trenches 92, 93 & 94) and 6 (Trench 112, 117 & 119). These are considered to be of local significance.
- Romano British activity in Area 1 including two sunken feature buildings (Trenches 2, 4, 7, 11, 14, 15, 17, 18, 29, 24 & 25). These remains are considered to be of local to regional significance.
- Romano British activity in Area 5 trenches 82 and 90. These remains are considered to be of local significance.
- A dumped deposit/possible midden of Romano-British date in trench 74 recorded a colluvium layer contained Romano-British pottery. These remains are considered to be of local significance.

### The Proposed Development

- 3.1** The proposed development comprises the installation and operation of a solar farm, together with all associated works, equipment and necessary infrastructure (Figs. 2, 8-11). As the scheme has not yet been granted planning consent, the detailed construction details have not yet been devised. However, the proposed panels will be mounted on small, piled foundations which would be driven in to the ground. On average the piled foundations for the solar arrays would be driven approximately 1.5m into the ground and each pile would measure no more than 0.016m<sup>2</sup> in area. Overall, c.0.1% of the red line boundary would be subject to pile coverage, that is 960m<sup>2</sup> out of 1,025,000m<sup>2</sup> (102.5Ha). Further information is provided separately in Chapter 6 – The Development Proposal and associated figures of the Environmental Statement dated April 2022, as well as in Chapter 6 of the Supplementary Environmental Information dated January 2024, submitted in support of the planning application.
- 3.2** Foundations for the SMA MV Power Stations, Inverter substations, welfare units and stores will require ground works which could impact on below ground remains. The cabling will be set in narrow trenches. No large-scale ground reduction or landscaping is planned for the development. Enabling works such as the installation of a compound area and haul road, as well as vehicle movements and storage of equipment during construction works may also have an impact on below ground remains.

### Scope of works

- 3.3** Figs 8-11 show the six areas of archaeological interest (A-F) overlaid on the proposed development layout. An agreed programme of archaeological works, which could include further trenching, excavation and/or monitoring followed by suitable post excavation or preservation in situ (subject to the significance of archaeology shown to be present) will be agreed with the county archaeologist. All mitigation will be implemented in accordance with a Written Scheme of Investigation (WSI) agreed with the Kent County Council on behalf of Ashford Borough Council and will be undertaken as a condition to the planning permission.
- 3.4** The elements of the scheme within each area of archaeology are as follows:
1. Area A - Two possible Neolithic pits (Trench 124); Mid/Late Bronze Age features; indications of Late Bronze/early Iron Age activity (Trenches 90 and 123); and Late Iron Age/Romano British activity in trenches 82 and 90. This area will have solar panels installed with no access tracks, transformers or substations. There will also be subsurface cables runs, the location of which will be fixed following consent.

2. A late Bronze Age/early Iron Age ditch and pit in Area E (Trench 13). This feature is located in an area of solar panels.
3. Late Iron Age-early Romano British settlement activity in Area C (Trenches 92, 93 & 94). This area will have solar panels installed with no access tracks, transformers or substations. There will also be subsurface cables runs, the location of which will be fixed following consent. There will be an access track to the north of the area where the remains were recorded.
4. Late Iron Age-early Romano British settlement activity in Area D (Trenches 112, 117 & 119). This area will have solar panels installed with no access tracks, transformers or substations. There will also be subsurface cables runs, the location of which will be fixed following consent.
5. Romano British activity in Area E including two sunken feature buildings (Trenches 2, 4, 7, 11, 14, 15, 17, 18, 29, 24 & 25). This area will have solar panels installed with no access tracks, transformers or substations. There will also be subsurface cables runs, the location of which will be fixed following consent.
6. In Area F, Trench 63 revealed a dumped deposit/possible midden of Romano-British date and trench 75 recorded a colluvium layer contained Romano-British pottery. This area will have solar panels installed with an access track cutting east-west through the centre of the area. There are no transformers or substations. There will also be subsurface cables runs, the location of which will be fixed following consent.

**Proposed archaeological works** – Strip, map & sample excavation of access track and monitoring and recording of cable trench excavations.

**3.5** These will be undertaken as a condition of the planning permission.

**3.6** It is understood that the areas of archaeological interest described above do not equate to areas of proposed mitigation. Mitigation may also include areas outside of the areas of archaeological interest depicted in the attached figures.

### Methodology

**3.7** A detailed written scheme of investigation for the implementation of the archaeological scheme of works will be produced and agreed with Ashford Borough Council, in consultation with Kent County Council, before any archaeology works can commence. This will conform to the ClfA Universal Guidance for Archaeological Excavation, Standards for Archaeological Excavation, Universal Guidance for Archaeological Monitoring and Recording, the Standards for Archaeological Monitoring and Recording Standards and Guidance for archaeological excavation (ClfA 2014) and all relevant KCC Spec Manuals and will form an addendum to this document.

- 3.8** In the event of additional/subsequent follow-on archaeological works being required, a separate methodology will be provided.

#### **4.0 Other matters**

##### **Contractor**

- 4.1** The appointed contractor for the programme of archaeological work will preferably be a Chartered Institute for Archaeologists Registered Organisation and have extensive experience of working on similar sites in Kent.
- 4.2** The field team deployed by the contractor will include only full time professional archaeological staff. All staff in supervisory positions should be members of the ClfA at the appropriate level.

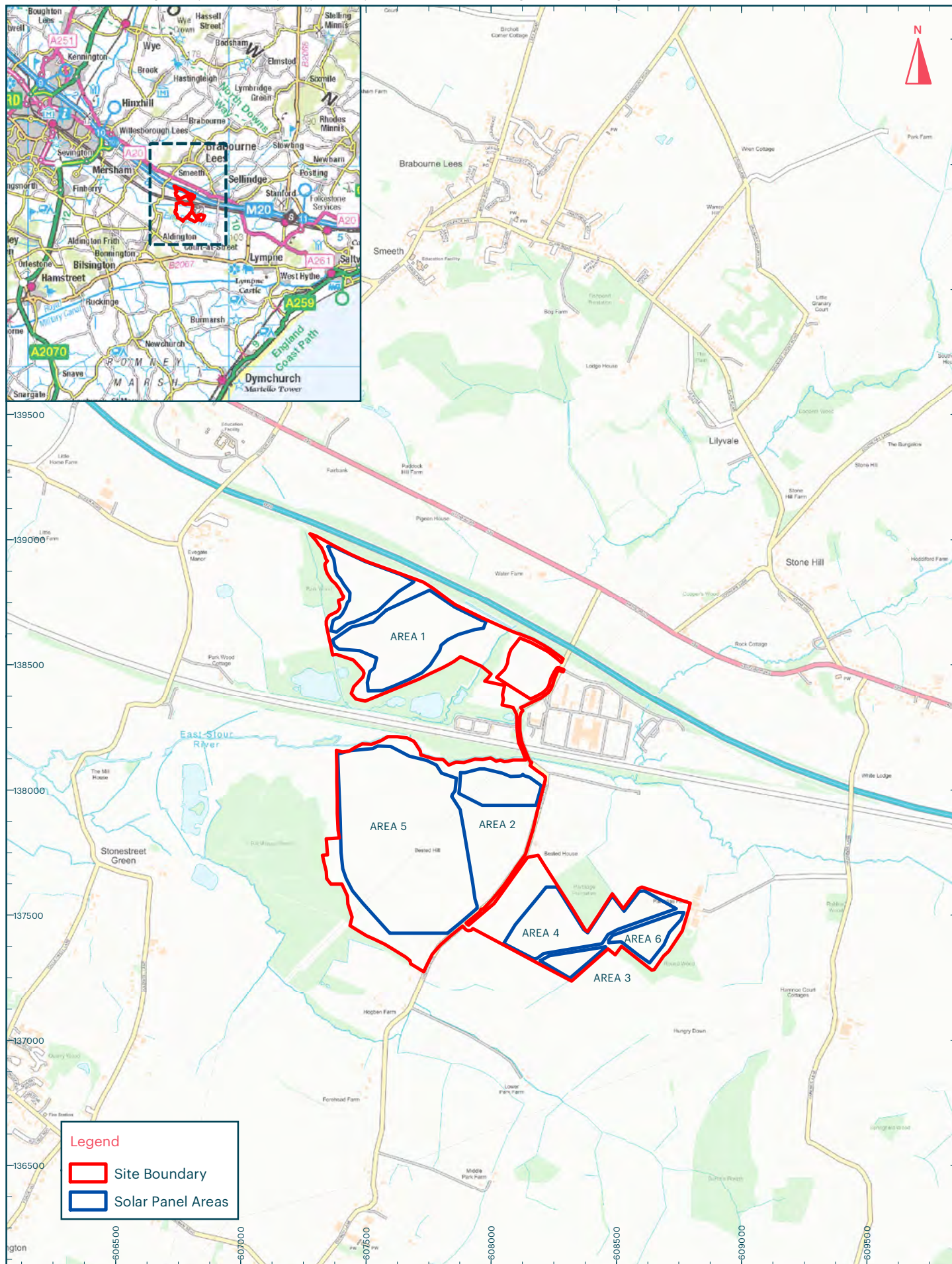
##### **Codes of Practice**

- 4.3** The following statutory provisions and codes of practice are to be adhered to where relevant:
- All statutory provisions and by-laws relating to the work in question, especially the Health and Safety at Work Act 1974; and
  - The Chartered Institute for Archaeologists Code of Conduct;
- 4.4** Should the archaeological contractor recover or encounter any finds believed to fall within the statutory definition of Treasure as defined by the Treasure Act 1996, they will immediately advise Orion Heritage and notify the relevant Coroner's Office.

##### **Variations**

- 4.5** Variations to the works outlined in this document must be approved, in advance, with the Ashford Borough Council, in consultation with Kent County Council





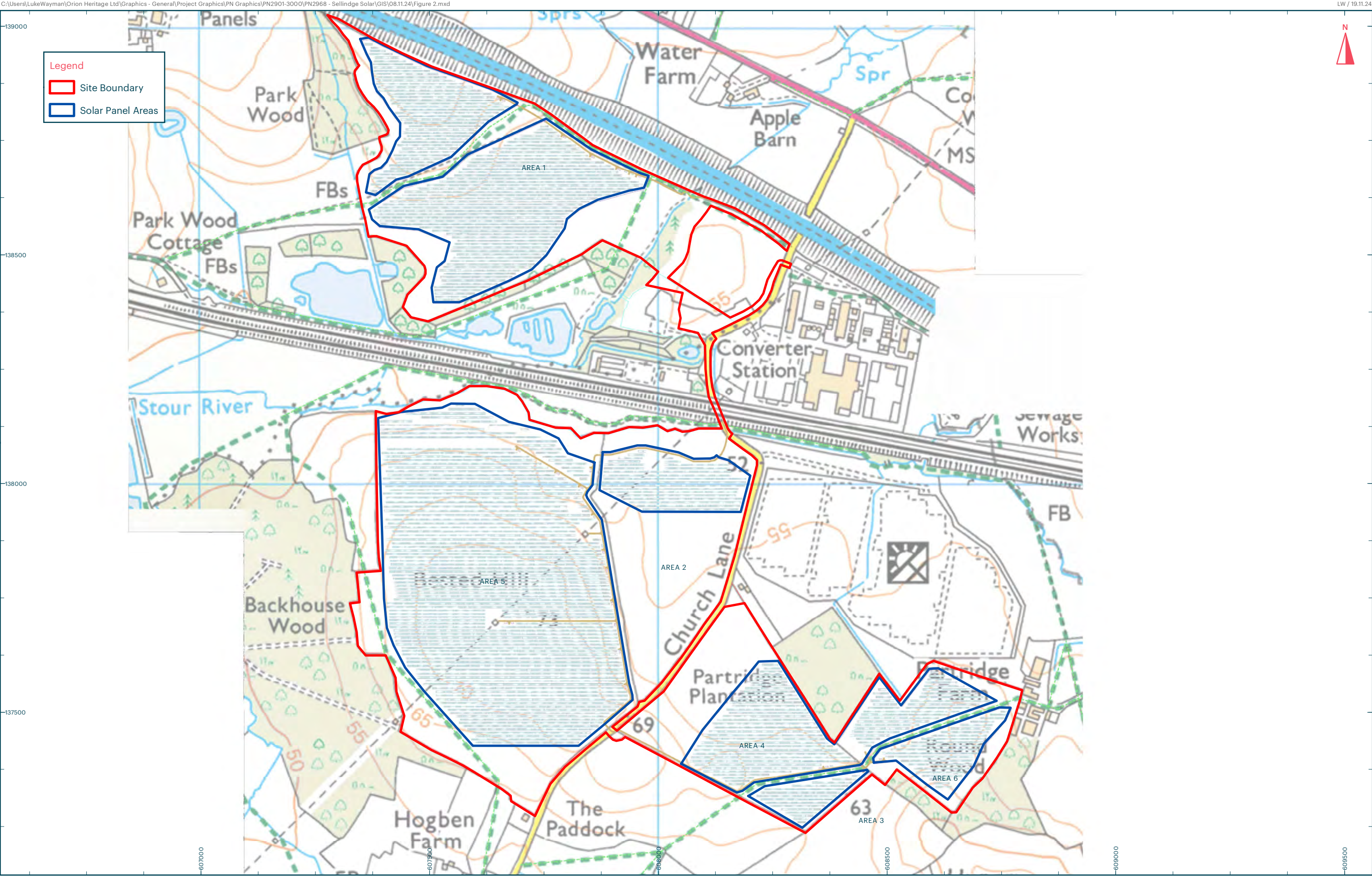
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Figure 1: Site Location  
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East Stour Solar Farm

Scale at A4: 1:20,000

0 500m

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**Title:**  
Figure 2: Layout of Proposed Development

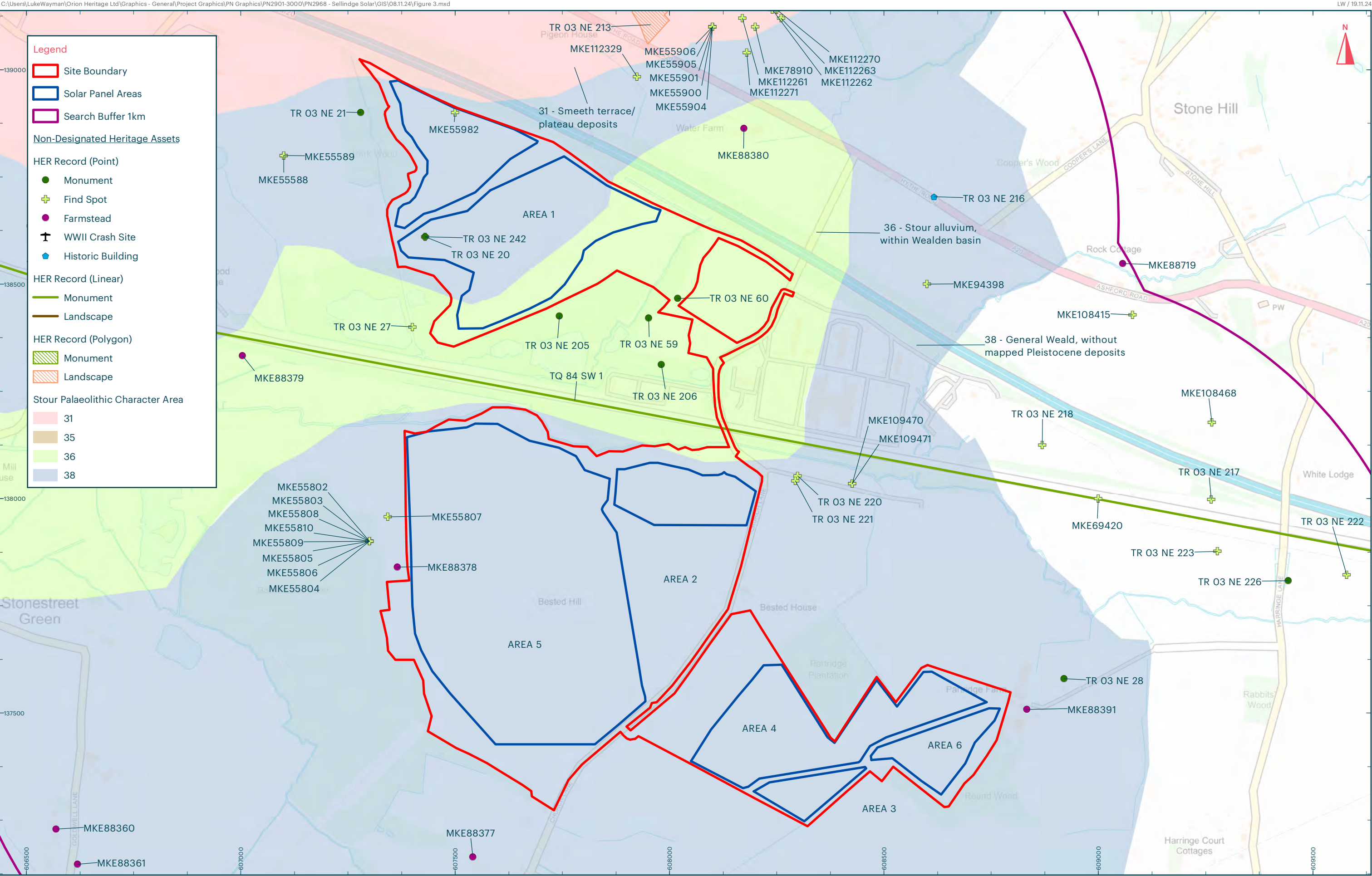
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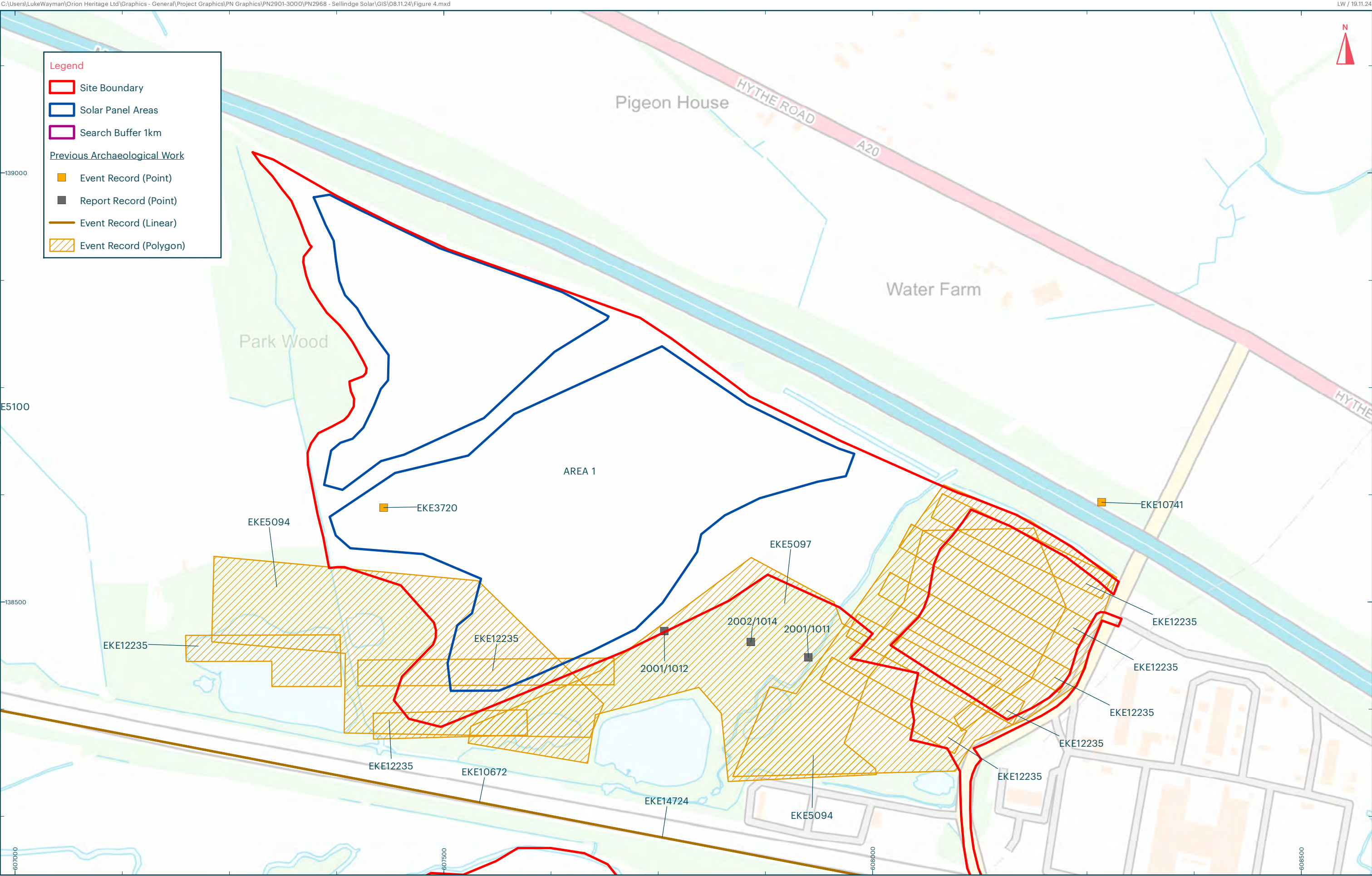


**Title:**  
Figure 3: HER Records  
**Address:**  
East Stour Solar Farm

Scale at A3: 1:8,000  
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**Title:**  
Figure 4: Previous archaeological investigations

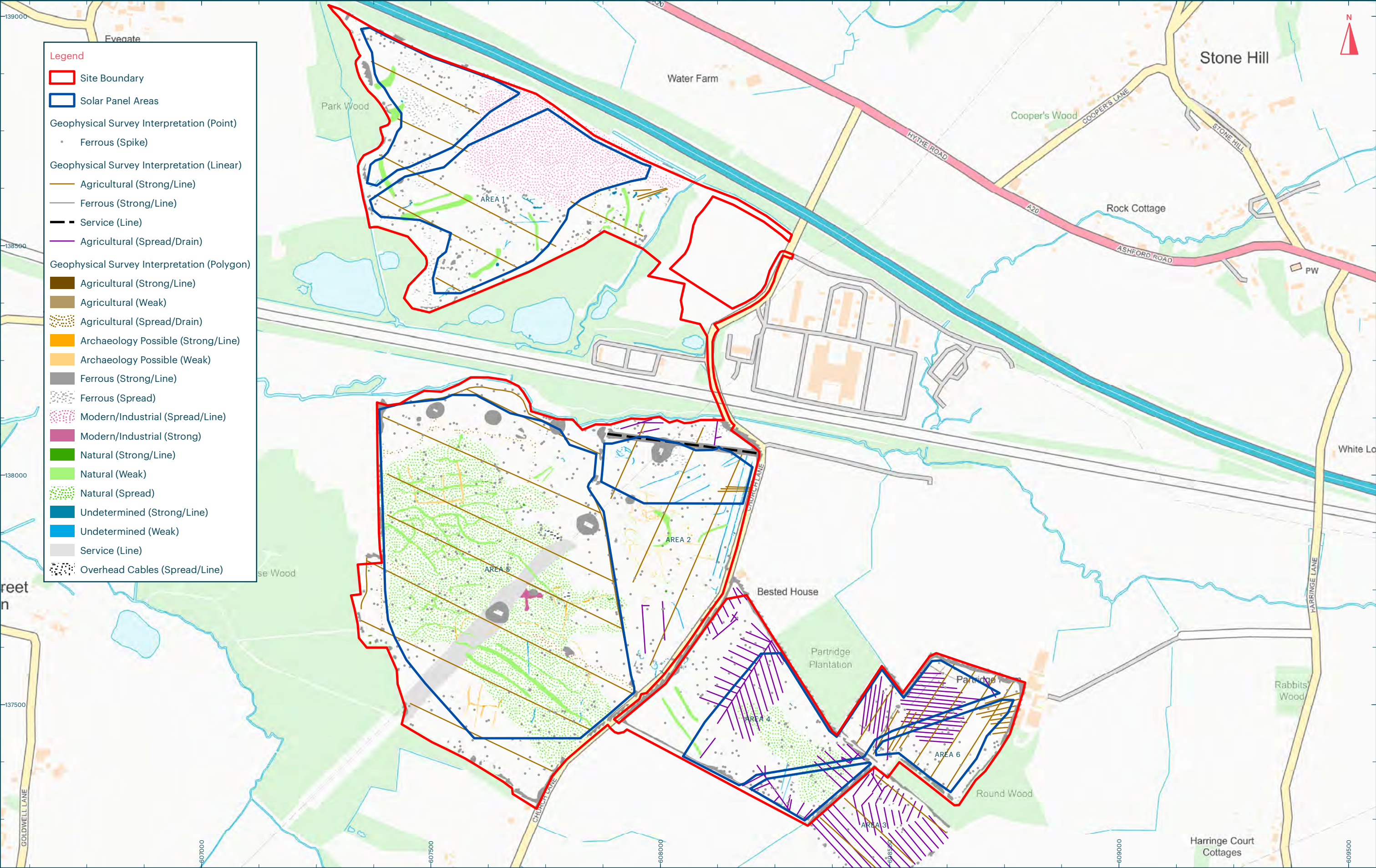
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East Stour Solar Farm

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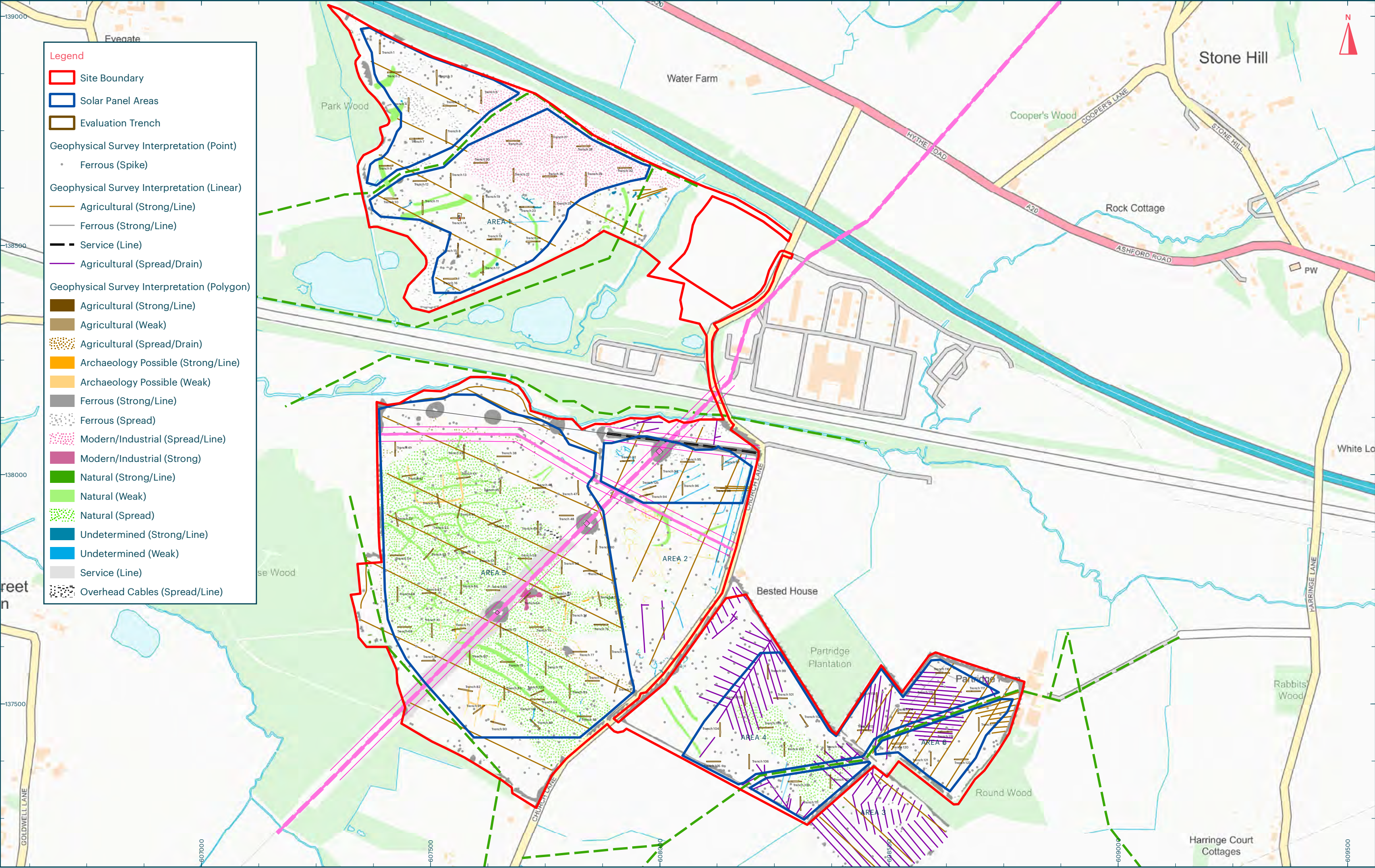
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**Title:**  
Figure 6: Evaluation Trench Plan overlaid on the geophysical survey results

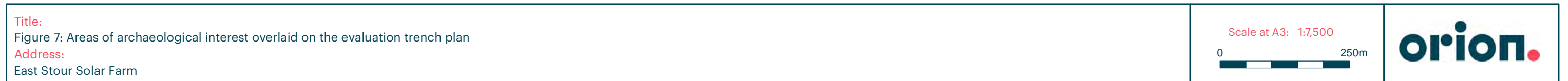
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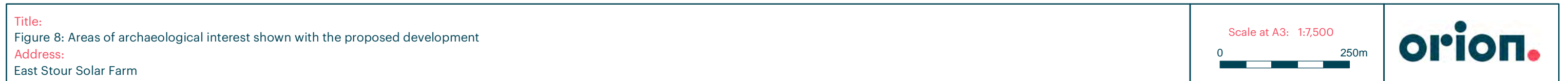
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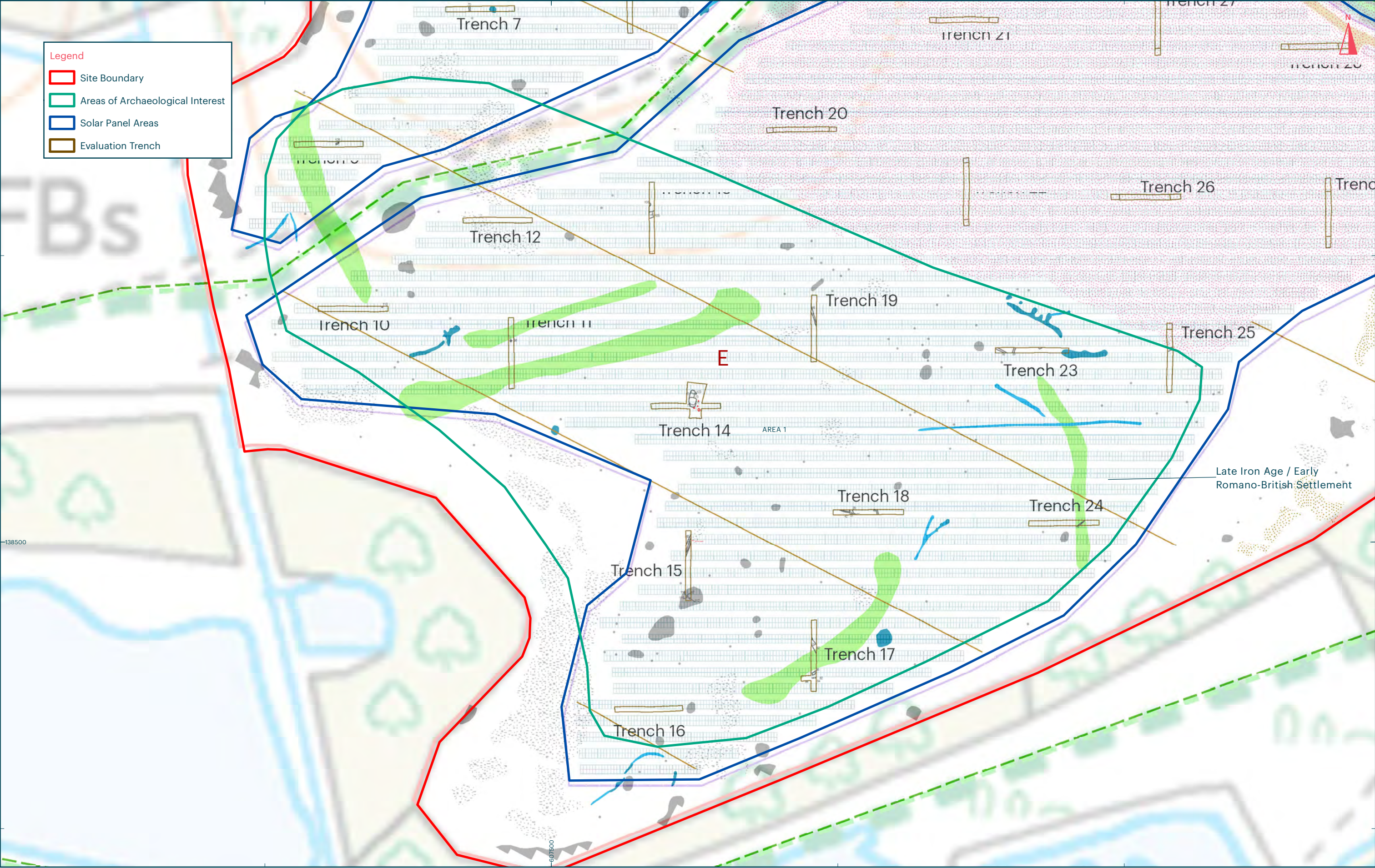












**Title:**  
Figure 9: Areas of archaeological interest shown with the proposed development - Northern Area

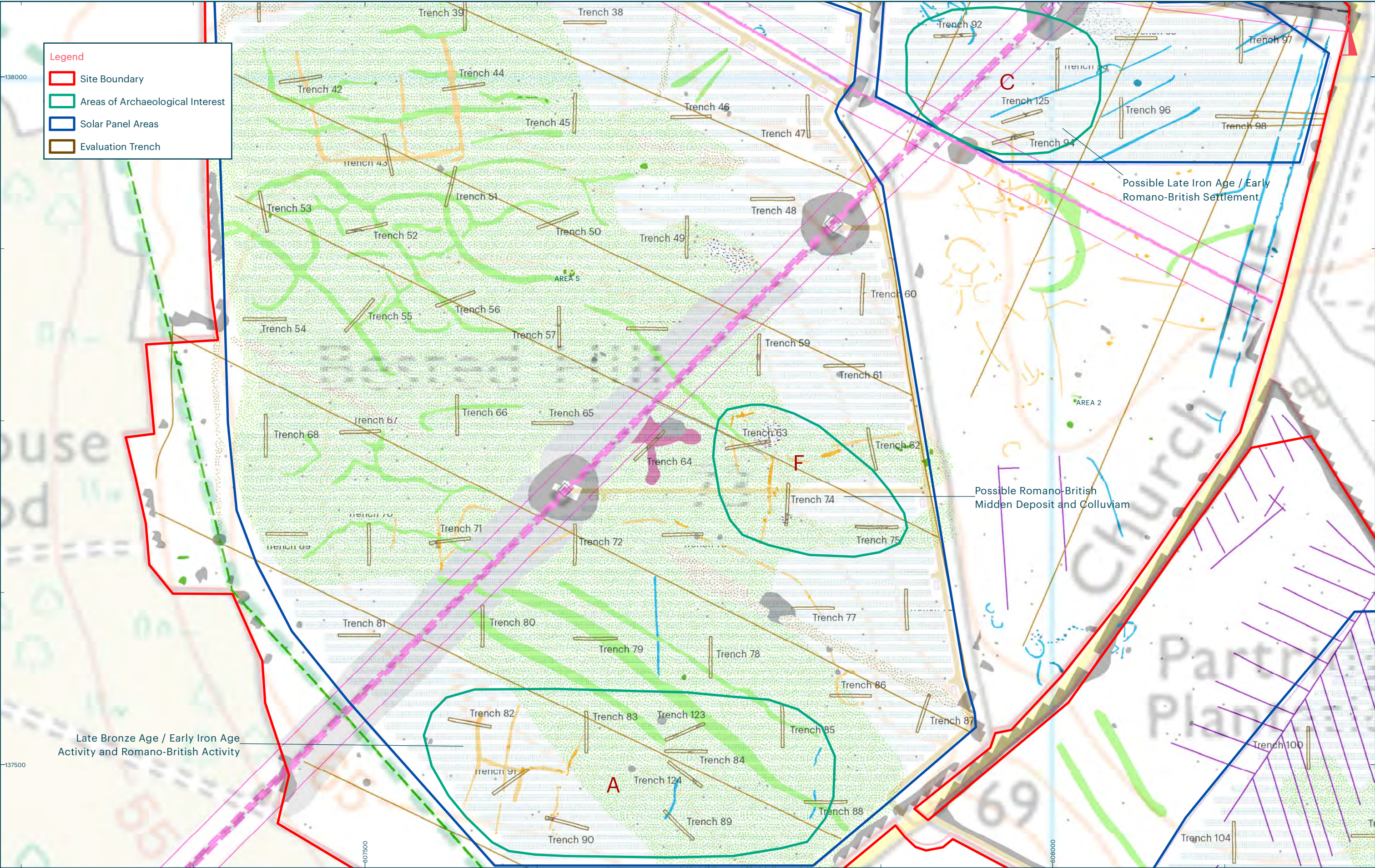
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East Stour Solar Farm

Scale at A3: 1:1,500

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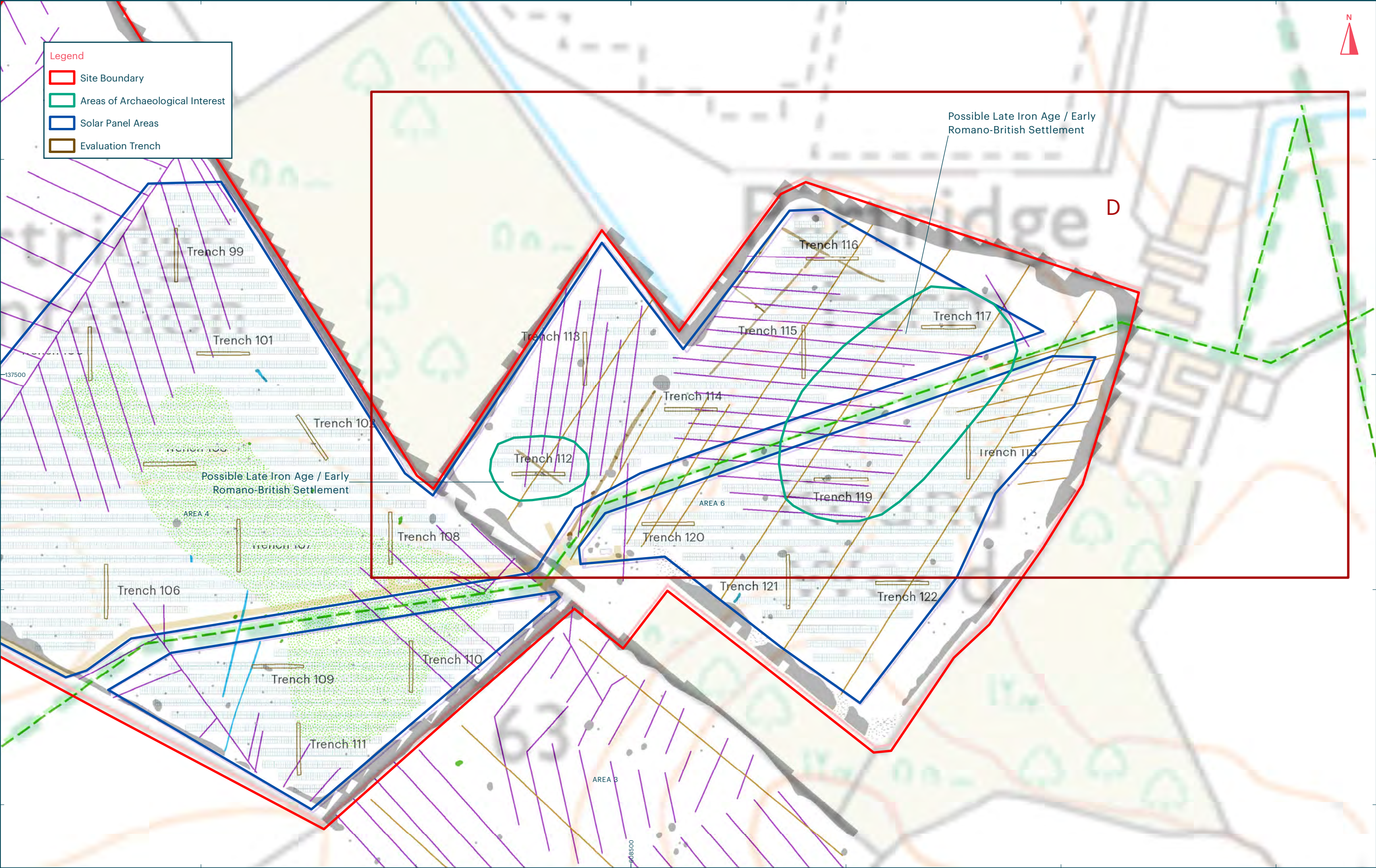
**Title:**  
Figure 10: Areas of archaeological interest shown with the proposed development - Central Area

**Address:**  
East Stour Solar Farm

Scale at A3: 1:2,500







**Title:**  
Figure 11: Areas of archaeological interest shown with the proposed development - Eastern Area

**Address:**  
East Stour Solar Farm

Scale at A3: 1:2,000

0 50m

