

Town and Country Planning Act 1990

Appeal by EDF Energy Renewables Limited (trading as EDF Renewables)

Land south of the M20, Church Lane, Aldington, Kent (known as East Stour Solar Farm)

Ashford Borough Council Reference: 22/00668/AS

Planning Inspectorate Reference: APP/E2205/W/24/3352427

Topic Specific Statement of Common Ground between EDF Energy Renewables Limited (trading as EDF Renewables) and Ashford Borough Council

Reasons for Refusal 2 (Archaeology), 3 (Traffic and Transport) and 4 (Ecology)

1. **Introduction**

- 1.1 This Statement of Common Ground ("**SoCG**") has been made between Eversheds Sutherland (International) LLP, Solicitors of Bridgewater Place, Water Lane, Leeds, LS11 5DR on behalf of EDF Energy Renewables Limited (trading as EDF Renewables) (the "**Appellant**") and Ashford Borough Council (the "**Council**").
- 1.2 This SoCG is supplementary to the Main SoCG agreed between the Appellant and the Council on 25 November 2024 and adopts the terminology of the Main SoCG. It does not repeat the details in relation to the Site, local area, Proposed Development, planning history, the Development Plan or other material considerations sections contained within the Main SoCG.
- 1.3 This supplementary SoCG relates specifically to those matters detailed within the second, third and fourth Reasons for Refusal within the Council's decision notice of 29 April 2024, which state as follows:

"2. By reason of the insufficient information provided regarding the potential impacts of the development on the significance of heritage assets with archaeological interest, the development would be contrary to policy ENV15 of the Ashford Local Plan 2030, policy AB11 of the emerging Aldington and Bonnington Neighbourhood Plan 2030 and the provisions of the National Planning Policy Framework.

3. By reason of the insufficient information provided regarding the management of construction vehicles during the construction phase of the development, the applicant has failed to demonstrate that the proposed development would have an acceptable impact on highway safety, and that the residual cumulative impacts on the road network would not be severe. The development would therefore be contrary to policies TRA7, TRA8 and ENV10 of the Ashford Local Plan 2030, policy AB10 of the emerging Aldington and Bonnington Neighbourhood Plan 2030 and the provisions of the National Planning Policy Framework.

4. By reason of the insufficient information provided regarding the mitigation and enhancement measures for badgers, breeding birds and brown hare, the applicant has failed to demonstrate that the proposed development would have an acceptable impact on protected species. The development would therefore be contrary to policies ENV1 and ENV10 of the Ashford Local Plan 2030, policy AB10 of the emerging Aldington and Bonnington Neighbourhood Plan 2030 and the provisions of the National Planning Policy Framework."

2. **Statement of Common Ground**

- 2.1 To assist the Inspector in preparing for the inquiry, and with the intention of minimising the extent of oral evidence they will need to receive, this document has been prepared to detail those areas of agreement that have been reached between the Appellant and the Council as at 7 January 2025 in relation to archaeological, traffic and transport, and ecological related impacts arising as a result of the Proposed Development.
- 2.2 There are no matters of disagreement remaining between the parties in respect of Reasons for Refusal 2, 3 and 4.

3. **Planning Conditions**

- 3.1 The parties to this supplementary SoCG are currently discussing a suite of planning conditions which they consider would be appropriate to be imposed in the event of the planning appeal being successful and planning permission being granted for the Proposed

Development. These discussions are at a relatively advanced stage and once agreement has been reached, insofar as such can be, this will be submitted for the Inspector's review. Where there remains any disagreement on a particular condition, both parties' positions will be clearly stated.

4. **Reason for Refusal 2: Archaeology**

4.1 Paragraphs 10.5 to 10.9 of the agreed Main SoCG set out the parties' positions in respect of Reason for Refusal 2, namely that there was disagreement between the parties as to whether sufficient information relating to archaeology had been provided by the Appellant.

4.2 It was the Council's position that there was:

4.2.1 no integrated and informed assessment of significance of the heritage assets drawing upon the results of the HEDBA, the geophysical survey and the Evaluation Report (Historic England Advice Note 12 (2019) on Statements of Significance); and

4.2.2 no assessment of impact or an informed mitigation for archaeology.

4.3 The Appellant's position was that:

4.3.1 such information was not required in order to demonstrate compliance with the Local Development Plan or the NPPF;

4.3.2 such information was never requested by the Council (or via any consultation response from KCC) during the life of the planning application; and

4.3.3 in any event, a proportionate level of detail on the archaeological aspects of the Proposed Development had been provided and that this level of detail is sufficient to understand the potential impact of the Proposed Development on the significance of the archaeological remains recorded.

4.4 Notwithstanding the Appellant's position, the Appellant did agree to prepare the information requested from KCC so as to enable the Council to confirm that sufficient information had now been provided and thereafter that Reason for Refusal 2 had been addressed.

4.5 Following submission of the Main SoCG, there have been several exchanges between the Appellant and the KCC Senior Archaeological Officer, which included the Appellant submitting:

1) an Outline Archaeological Mitigation Strategy prepared by Orion Heritage Ltd (a copy of which has been appended to this SoCG at **Appendix 1**); and

2) an Archaeological Statement of Significance prepared by Orion Heritage Ltd (a copy of which has been appended to this SoCG at **Appendix 2**).

4.6 The Appellant has agreed to provide a fully updated version of the Archaeological Evaluation Report (which was originally submitted as Appendix 12.1 of the SEI), which will include the plans submitted to KCC. However, this will take some time to prepare and so will follow in January 2025. KCC's Senior Archaeological Officer confirmed that this was acceptable to them.

4.7 The Archaeological Mitigation Strategy outlines the nature and scope of the archaeological works required to appropriately mitigate the impact of the Proposed Development. This document will inform and guide the agreement of the scope of the mitigation works with

KCC during consultations following the granting of planning permission and will form the basis of the archaeological Written Scheme of Investigation that will be submitted to and approved by the Council prior to archaeological works commencing.

- 4.8 The Statement of Significance outlines the conclusions on the significance of the archaeological remains recorded in the geophysical survey and evaluation trenching of the Site.
- 4.9 In light of KCC's confirmation that the aforementioned information has satisfied its concerns, it is now agreed between the Appellant and the Council that it has been demonstrated that, subject to imposition of appropriate planning conditions, impacts to archaeology arising as a result of the Proposed Development are considered to be acceptable.
- 4.10 The parties will provide a draft of the condition(s) which they consider to be appropriate to be imposed in the event of planning permission for the Proposed Development being granted, in due course.
- 4.11 On this basis, it is agreed between the parties that Reason for Refusal 2 has been addressed and should no longer be considered to comprise a reason for refusing the Proposed Development.

5. Reason for Refusal 3: Traffic and Transport

- 5.1 Paragraph 9.38 of the Main SoCG confirmed that the parties' position in respect of Reason for Refusal 3 was that the consultation responses of KCC dated 26 August 2023 and 21 February 2024 were capable of being addressed through a Construction Traffic Management Plan and associated imposition of a planning condition.
- 5.2 The parties will provide a draft of the condition(s) which they consider to be appropriate to be imposed in the event of planning permission for the Proposed Development being granted, in due course.
- 5.3 On this basis, it is agreed between the parties that Reason for Refusal 3 has been addressed and should no longer be considered to comprise a reason for refusing the Proposed Development.

6. Reason for Refusal 4: Ecology

- 6.1 Paragraphs 9.11 to 9.36 of the agreed Main SoCG set out the parties' positions in respect of Reason for Refusal 4, namely that it was agreed that the Supplementary Ecology Information submitted to respond to the matters raised by KCC EAS within its consultation response, together with the ES and SEI, are sufficient to demonstrate that, subject to imposition of appropriate planning conditions, impacts to ecology arising as a result of the Proposed Development are considered to be acceptable.
- 6.2 The parties will provide a draft of the condition(s) which they consider to be appropriate to be imposed in the event of planning permission for the Proposed Development being granted, in due course.
- 6.3 On this basis, it is agreed between the parties that Reason for Refusal 4 has been addressed and should no longer be considered to comprise a reason for refusing the Proposed Development.

7. Evidence for the Inquiry

- 7.1 The Main SoCG together with this supplementary SoCG confirm that the Council is no longer pursuing Reasons for Refusal 2, 3, 4 or 5 as part of the appeal process.
- 7.2 In light of the agreement reached in the Main SoCG and this supplementary SoCG, the parties consider that the extent of evidence to be examined at the public inquiry comprises of those matters raised within the Council's first Reason for Refusal only.
- 7.3 The extent to which there is disagreement between the parties in respect of landscape and visual impacts arising as a result of the Proposed Development is set out within the Main SoCG and a separate standalone landscape and visual specific supplementary SoCG.
- 7.4 The extent to which there is disagreement between the parties in respect of planning policy compliance is set out within the Main SoCG.

Appendix 1: Outline Archaeological Mitigation Strategy prepared by Orion Heritage Ltd

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

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 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-20th 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 1st February and 31st 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 0.016m² in area. Overall, c.0.1% of the red line boundary would be subject to pile coverage, that is 960m² out of 1,025,000m² (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

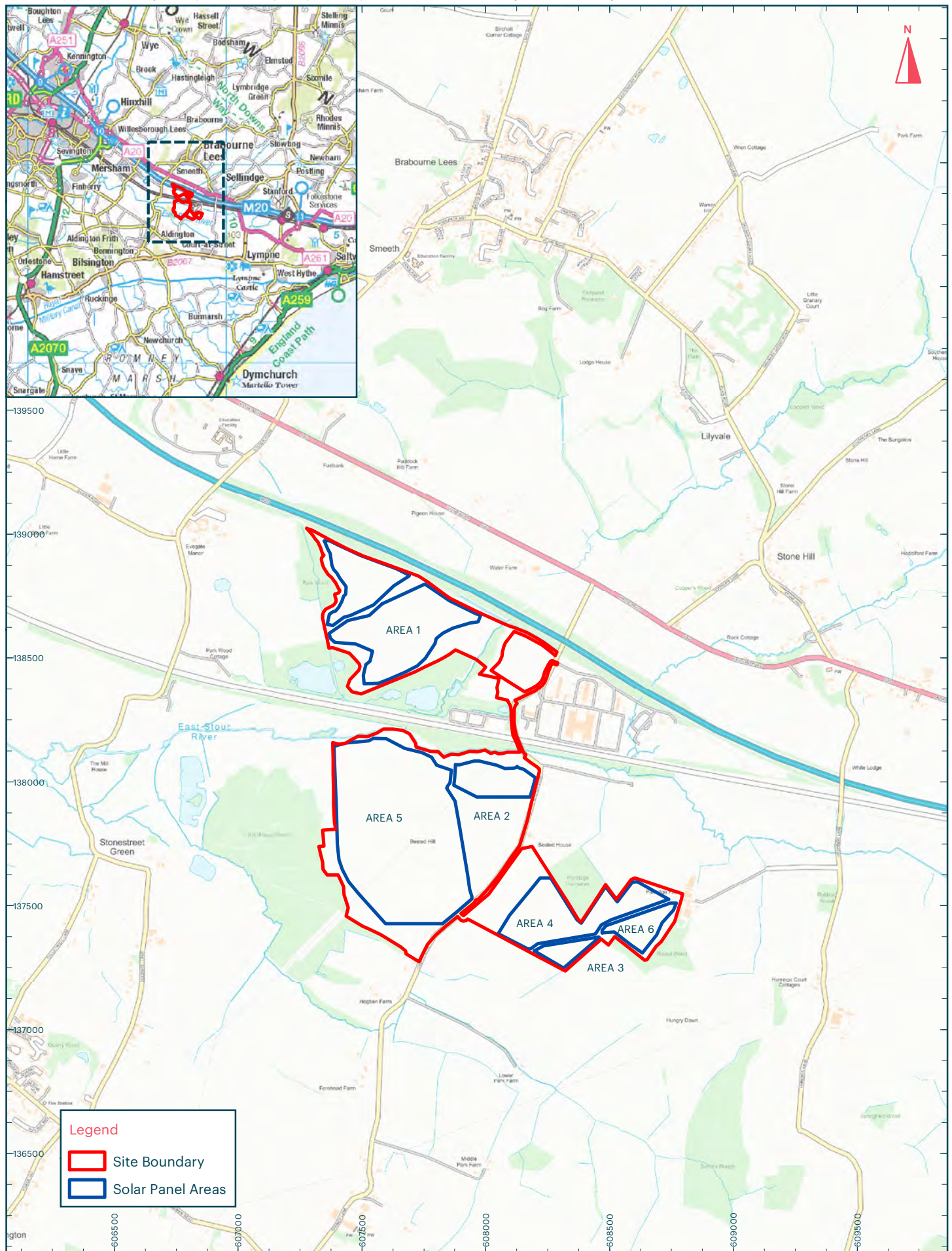
- 4.1** The appointed contractor for the programme of archaeological work will preferably be a Chartered Institute for Archaeologists Registered Organisation and have extensive experience of working on similar sites in Kent.
- 4.2** The field team deployed by the contractor will include only full time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

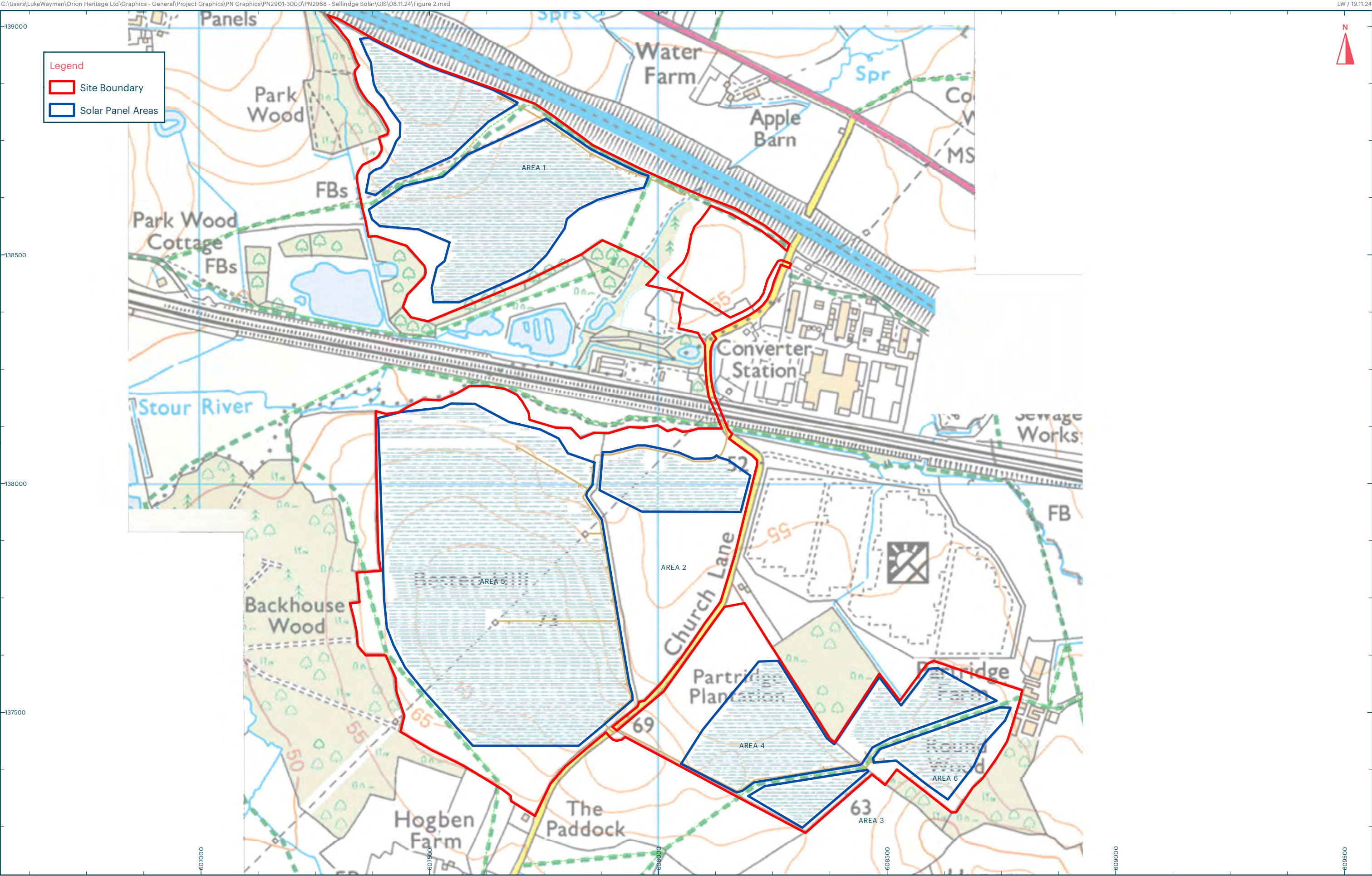
Codes of Practice

- 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





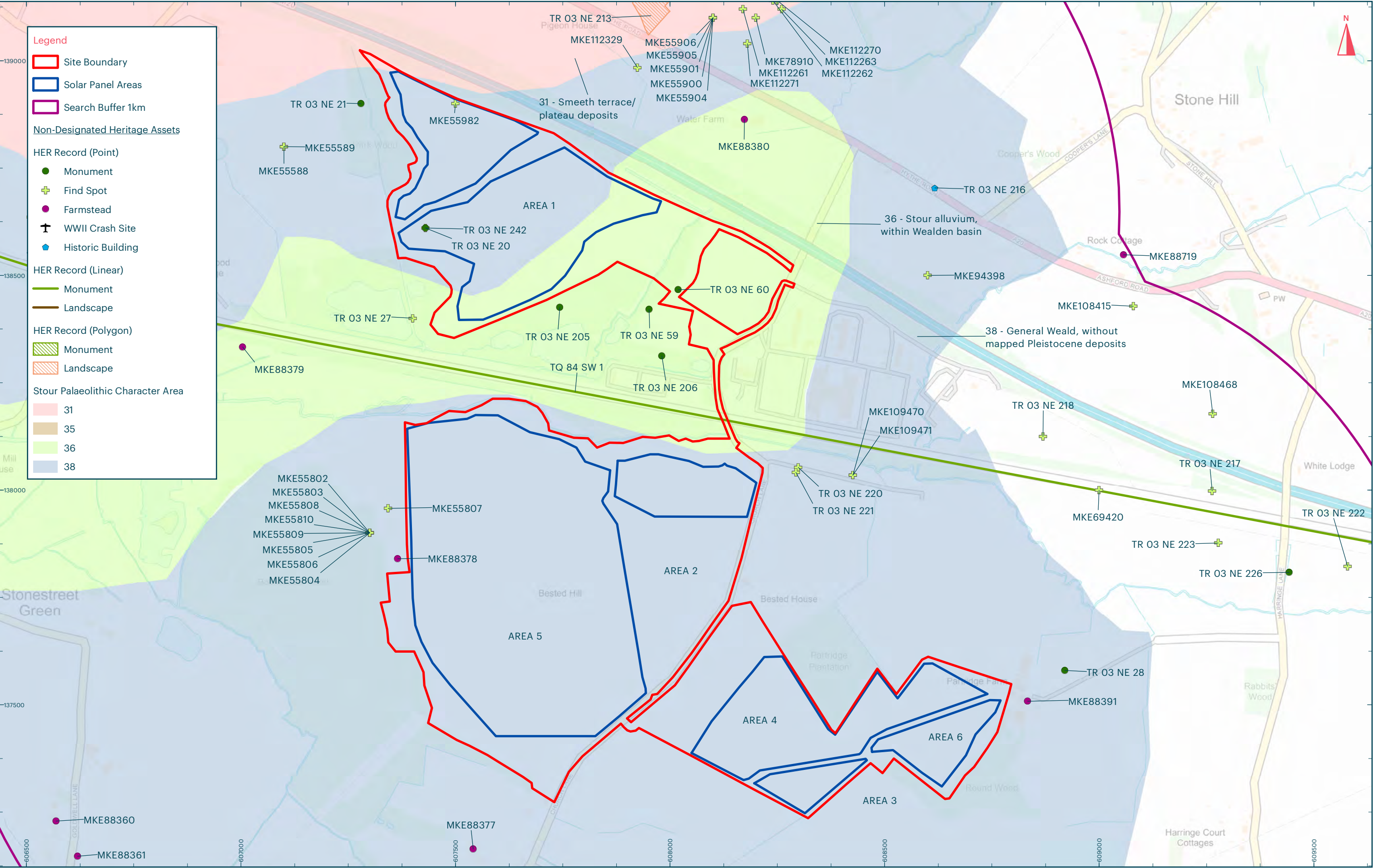
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Figure 2: Layout of Proposed Development

Address:
East Stour Solar Farm

Scale at A3: 1:7,500

0 250m





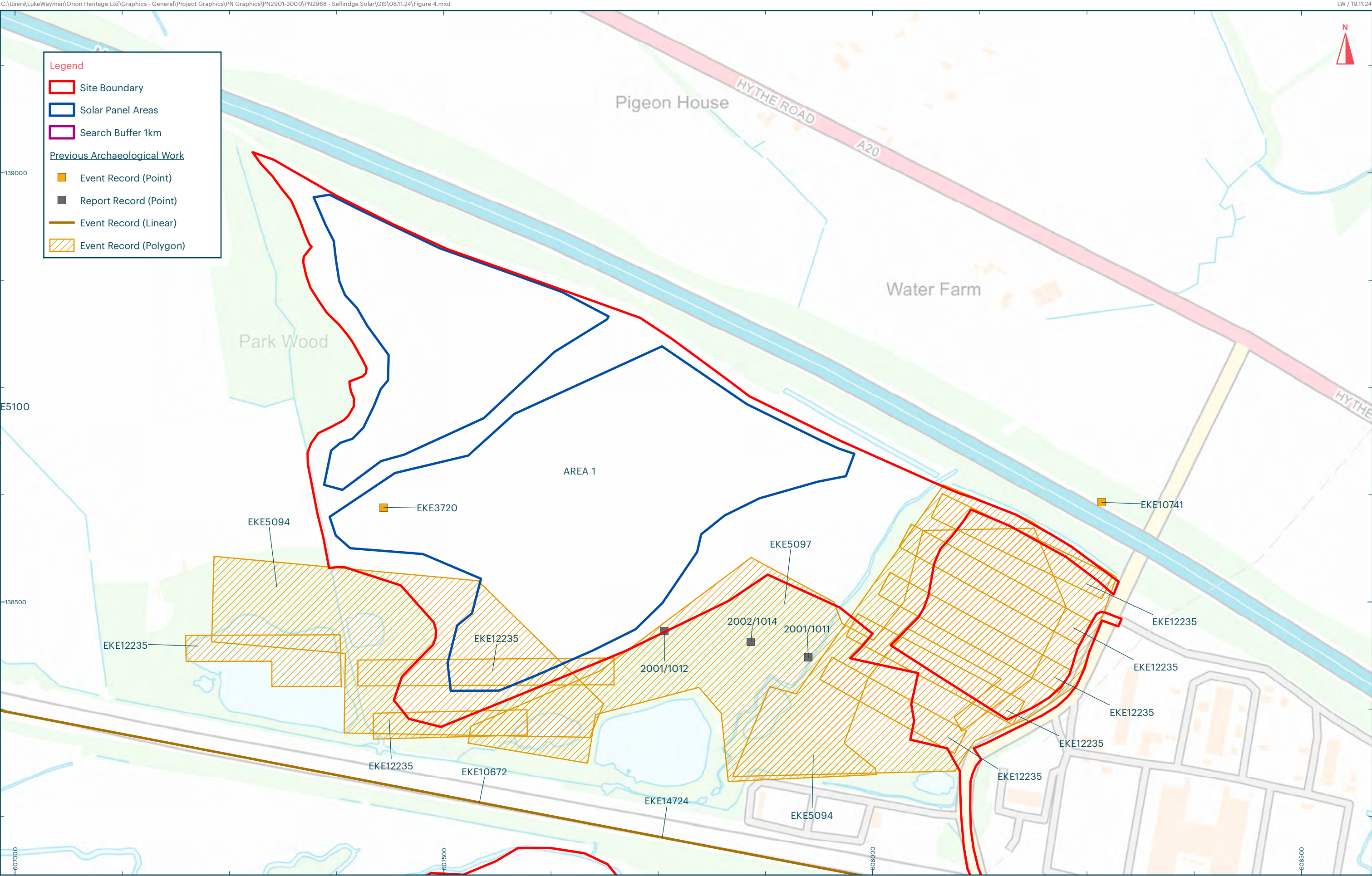
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Figure 3: HER Records

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East Stour Solar Farm

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0 250m





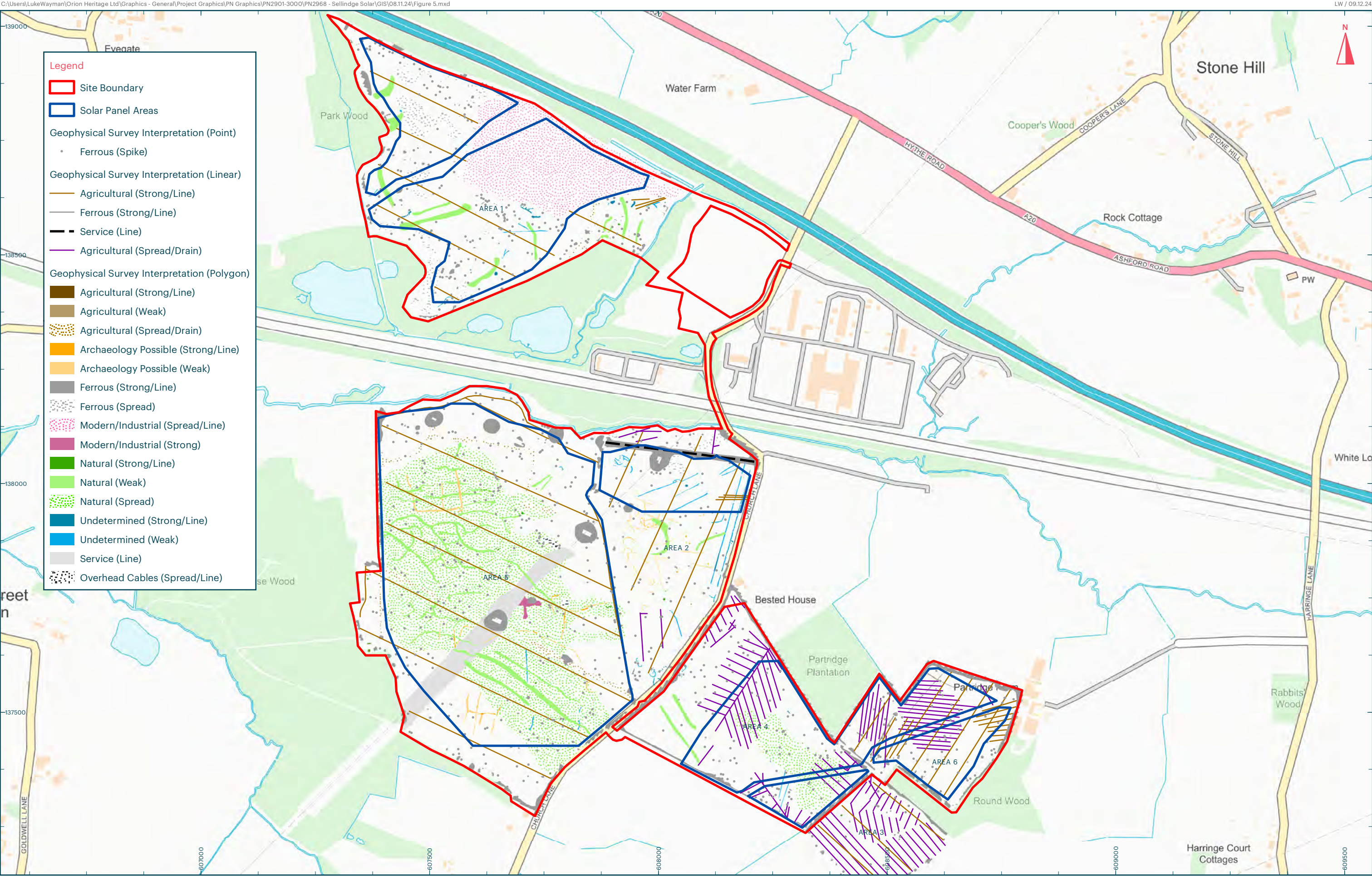
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Figure 4: Previous archaeological investigations

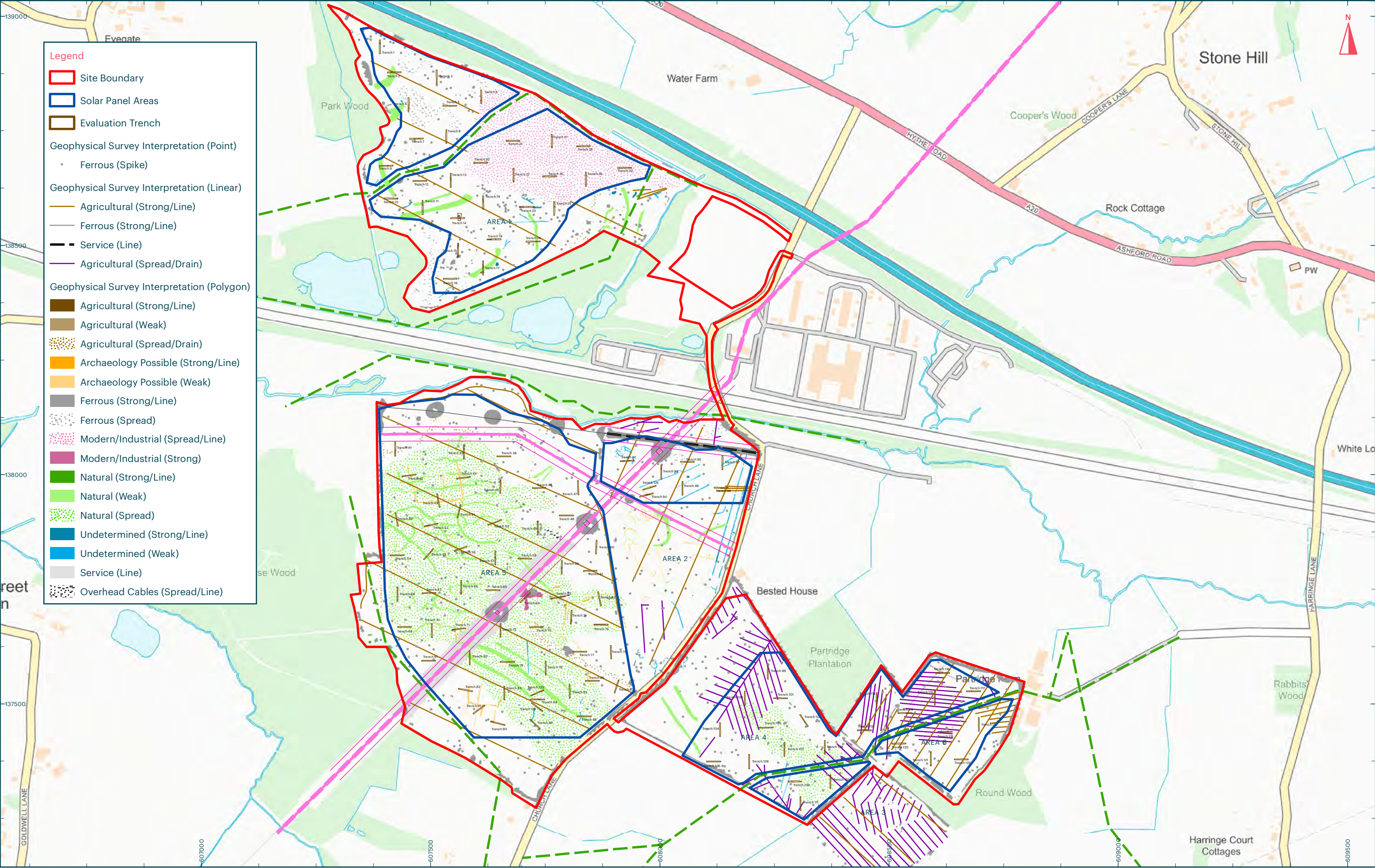
Address:
East Stour Solar Farm

Scale at A3: 1:4,000

0 100m

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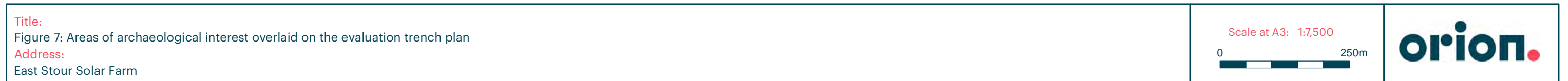
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Figure 6: Evaluation Trench Plan overlaid on the geophysical survey results

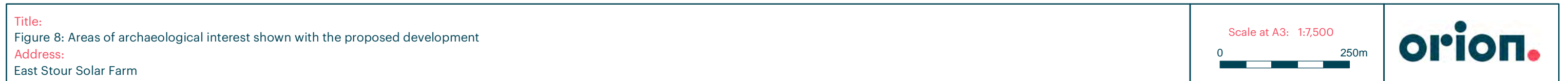
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East Stour Solar Farm

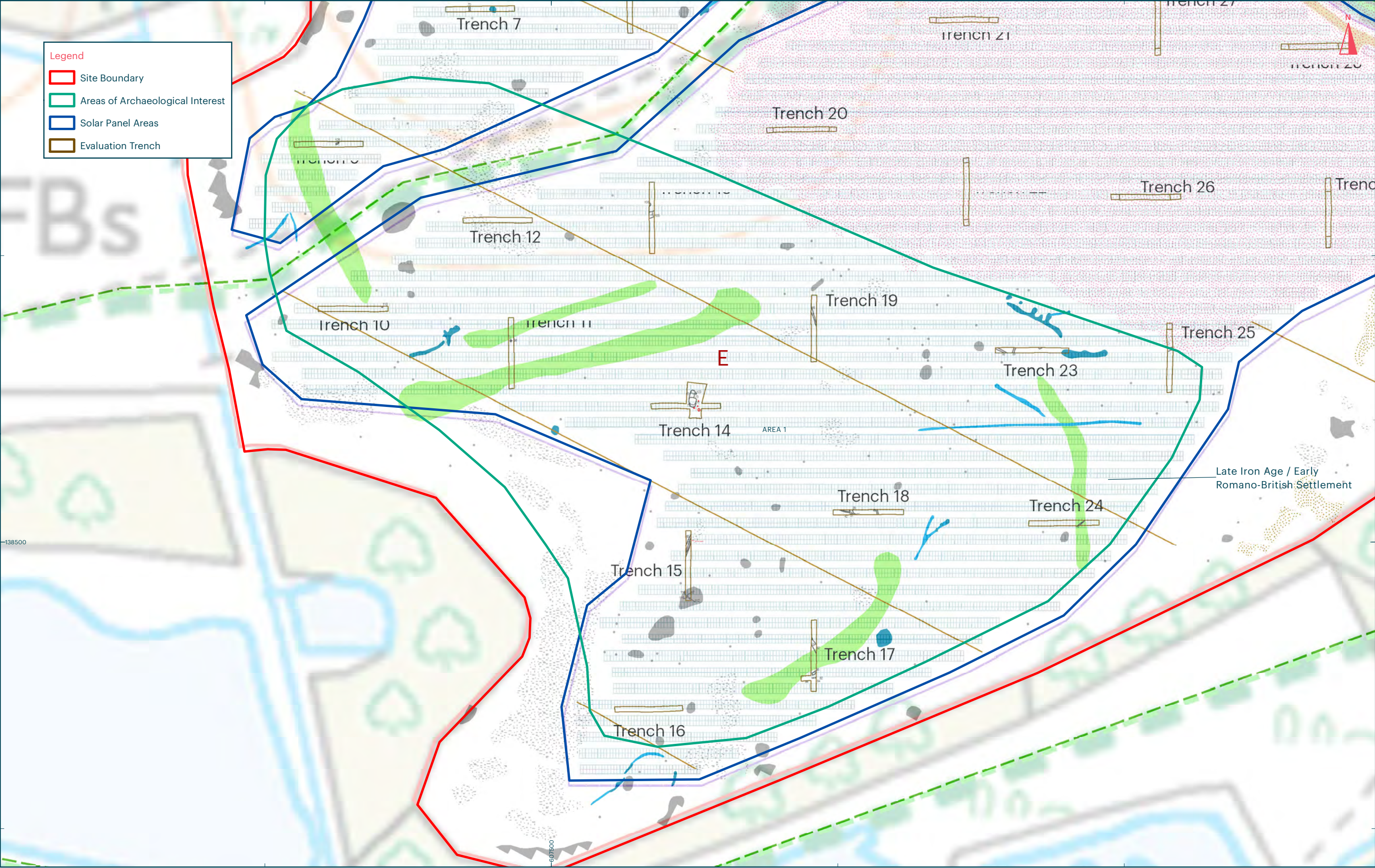
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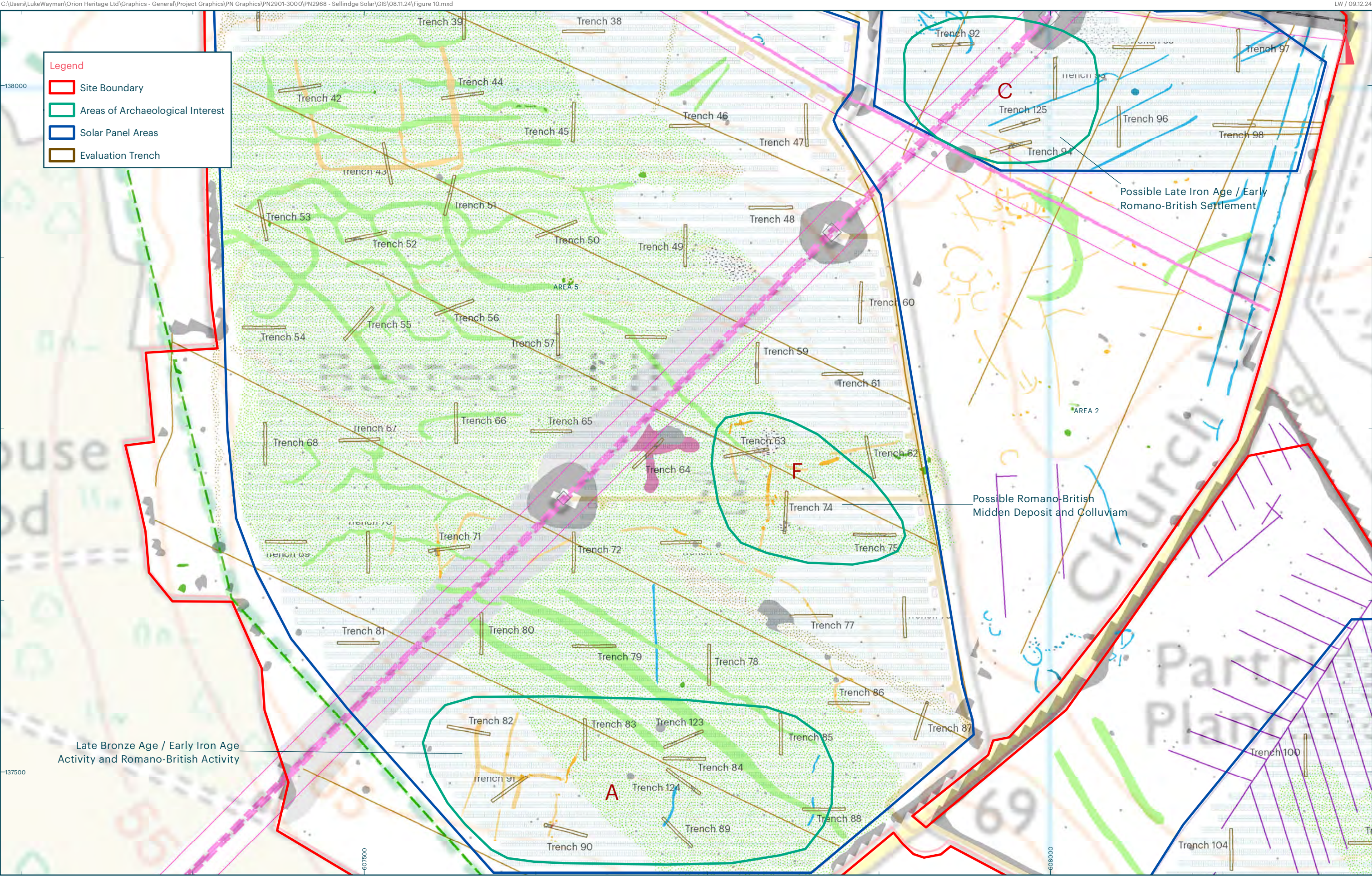
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Figure 9: Areas of archaeological interest shown with the proposed development - Northern Area

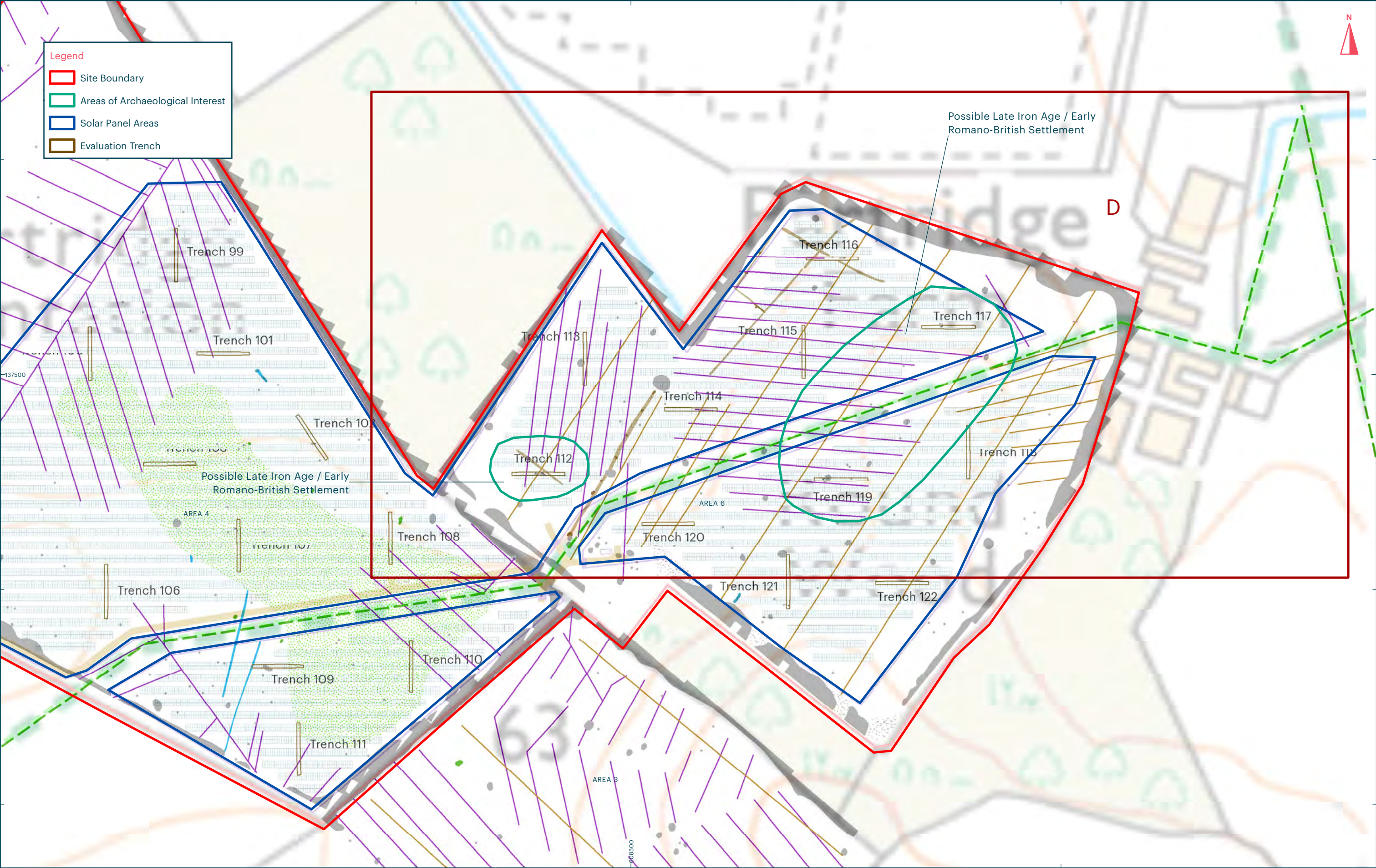
Address:
East Stour Solar Farm

Scale at A3: 1:1,500

0 50m







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



Appendix 2: Archaeological Statement of Significance prepared by Orion Heritage Ltd

Orion Heritage

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Land south of the M20, Church Lane, Aldington, Kent (known as East Stour Solar Farm)

Archaeology Statement of Significance

Application ref 22/00668/AS

Aims and Scope

- 1.1 This archaeology technical note summarises the findings of the archaeological work undertaken in relation to the East Stour planning application and provides a statement of significance on the archaeological remains recorded within the site.
- 1.2 The 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") was refused permission and is now the subject of a planning appeal. Reason for refusal 2 relates to the purported lack of archaeological information provided. Ashford Borough Council have requested an assessment of the significance of the archaeological remains recorded within the Proposed Development. This document provides that assessment.

Archaeological assessment work undertaken to date

- 1.3 The planning application was submitted with a detailed Historic Environment Desk Based Assessment ("HEDBA") produced by Orion Heritage dated February 2022. This assessment was undertaken in accordance with the ClfA Standards and Guidance for Historic Environment Desk Based Assessments (2020). It included as Appendix 1, a geophysical survey of the red line area of the planning application which was undertaken by Orion Heritage's appointed sub-contractor, Magnitude Surveys, in accordance with the ClfA Standards and Guidance for Geophysical Survey (2020). The results of the geophysical survey resulted in an area of the Proposed Development site being excluded from having solar panels due to the nature of the archaeological remains in part of the red line area of the site adjacent to Area 2 of the geophysical survey so as to ensure that these remains were preserved in-situ.



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Registered address: The Old Casino, 28 Fourth Avenue
Hove, East Sussex, England, BN3 2PJ

- 1.4 Kent County Council's consultation response dated 30th August 2022 stated that they considered that an archaeological evaluation was required to 'ground truth' the geophysical survey. Following receipt of this consultation response, archaeological evaluation trenching of the Site was undertaken by Orion Heritage's contractor, Pre-Construct Archaeology, in accordance with a Written Scheme of Investigation ("WSI") approved by Kent County Council on behalf of Ashford Borough Council. The evaluation was undertaken between 1st February and 31st March 2023 comprising the excavation of 117 30m x 2m trenches across all the proposed developable areas of the Site targeting geophysical survey anomalies recorded in the 2020 geophysical survey and the 'blank' areas of the Site. A Senior Archaeological Officer of Kent County Council archaeology department visited the Site once during the evaluation works. The evaluation report was submitted as part of the SEI in January 2024.

Results of the archaeological assessment

HEDBA & Geophysical Survey

- 1.5 The combined HEDBA and geophysical survey (the HEDBA included consideration of the geophysical survey results) established that there have been a number of archaeological interventions in Area 1 which have effectively recorded and removed potential archaeological deposits in the following areas (Figure 1 & 2):
- 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 has 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.
 - Geophysical survey of the area has identified no evidence of associated features with either the find spot or the possible windmill mound.
- 1.6 The geophysical survey identified the following possible and undetermined areas of archaeological interest (Fig. 3):
- [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;

- The survey recorded the location of the mid-20th century radio mast foundation in the centre of Area 5 [MS5f].

1.7 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.

1.8 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

1.9 The evaluation 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 Areas 1 (Trench 6) and 5 (Trench 123); 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); 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 1. These findings are broadly in keeping with the results of the geophysical survey and HEDBA.

1.10 It is acknowledged that while a geophysical survey can provide a direct measurement of subsurface properties, it is not a map of the ground. It is further acknowledged that a zone of more enhanced material (Natural (spread)) was identified during the geophysical survey in the centre of the survey area, which may obscure archaeology within this zone (Area 5 as shown on the attached figure 3). A geophysical survey cannot in itself determine the age, depth or quality of buried archaeological remains. It is considered that the combination of geophysical survey and evaluation trenching has provided a robust evidence base for the site. The results of the two surveys support and build on one another and have allowed an informed view of the archaeological potential of the site. Based on currently available information, the remains identified are all considered to be of local to regional significance and are not design constraints.

1.11 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, 83, 90 and 91 were targeted on this feature. Trenches 82, 83 and 91 did not contain any archaeological features; trench 82 contained colluvium and one sherd of Late Iron Age/Early Romano-British pottery was found within it. Trench 90 also contained colluvium and revealed a large ditch and a smaller parallel ditch both of which were dated to the late Bronze Age/early Iron Age period.
- [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

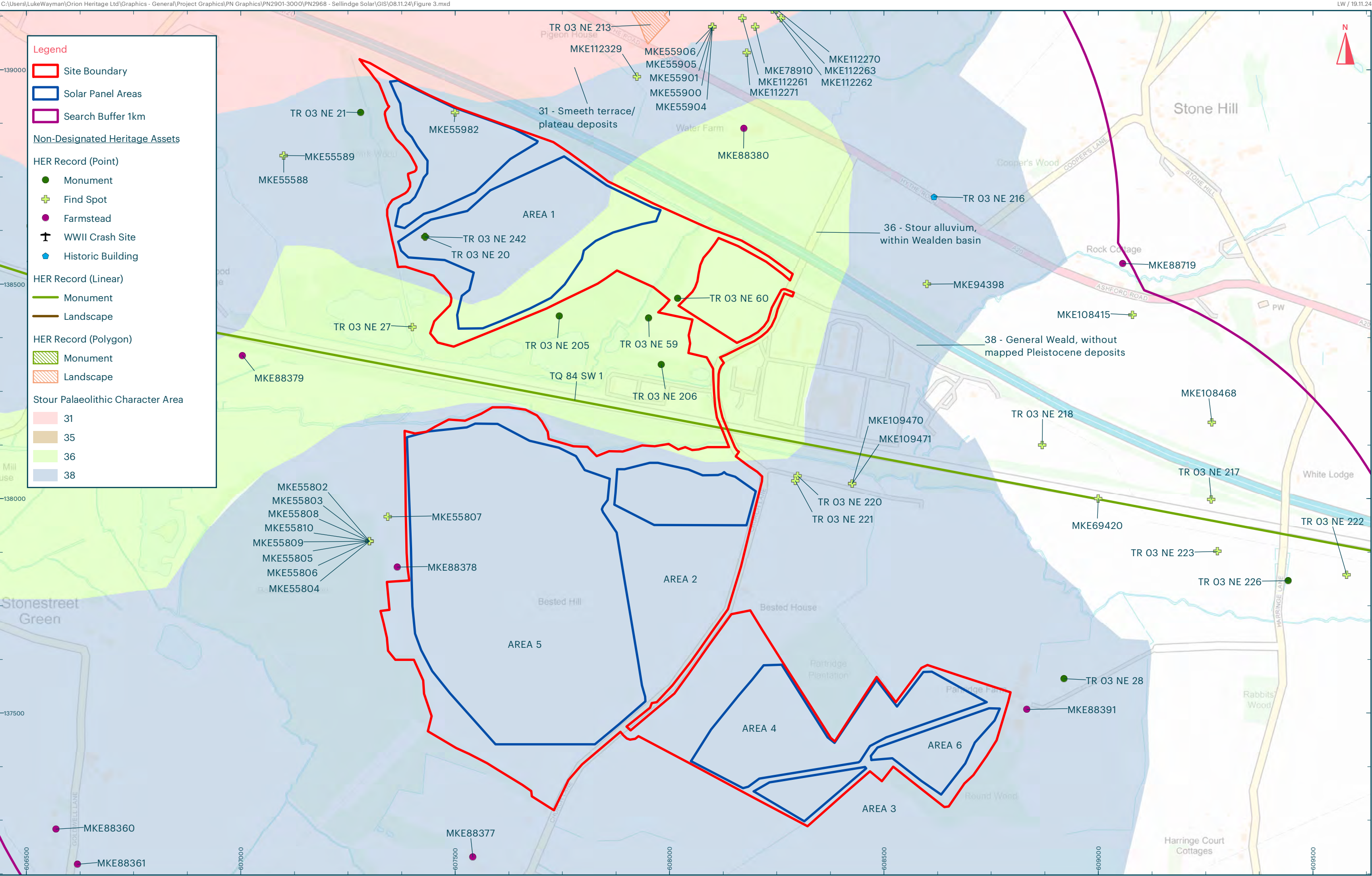
1.12 The significance of the identified remains, which are of archaeological interest, as detailed in Historic England's Advice Note 12 'Statements of Heritage Significance, Analysing Significance in Heritage Assets' (Figure 5) is considered to be as follows:

- Two possible Neolithic pits in Area 5 (Trench 124). These are isolated features and are considered to be of local significance. The Historic Environment Record (HER) data for a 1km buffer study area surrounding the site records a number of findspots of Neolithic artefacts (MKE78892 – flint core; TRO3NE66 – Neolithic finds indicative of transient activity; TRO3NE218 – possible Neolithic knife; TRO3NE222 – Neolithic arrowhead). The two isolated pits and artefactual findspots provide evidence indicative of transient temporary/seasonal activity across the wider landscape and are considered to be of local significance.
- Mid/Late Bronze Age features in Areas 1 and 5 (Trenches 6 & 123) comprising a pit and a posthole or small pit. These are considered to be of local significance as on the basis of the results of the evaluation, these are isolated features and are not indicative of domestic, ritual or funerary activity. The Historic Environment Record (HER) data for a 1km buffer study area surrounding the site records a Late Bronze Age settlement enclosure (TRO3NE61), part of a possible Middle Bronze Age field system (TRO3NE60), findspots of Late Bronze Age/Iron Age pottery (TRO3NE217), a Bronze Age arrowhead (TRO3NE210), a Bronze Age copper alloy axe head (MKE109084) and a Bronze Age copper-alloy knife blade (MKE109473).

- Late Bronze Age/Early Iron Age features in Area 1 (Trench 13) and Areas 5 (Trenches 90 & 123) comprising ditches and pits. These features are considered to be of local significance. A Late Bronze Age settlement enclosure (TR03NE61) is recorded within the 1km buffer study area surrounding the site, as are various findspots of Bronze Age artefacts (see above).
- Focuses of Late Iron Age-early Romano British settlement activity in Areas 2 (Trenches 92, 93 & 94) and 6 (Trench 112, 117 & 119). These comprise gullies, ditches, ditch termini, pits and two undated postholes. Some of the features contained no dating evidence but were tentatively placed in this phase due to their proximity to other features that have been dated to this phase. These are considered to be of local significance.
- Romano British activity in Area 1 including two possible sunken feature buildings (Trenches 2, 4, 7, 11, 14, 15, 17, 18, 29, 24 & 25). The fills of the sunken feature buildings did not contain any dating evidence, however, they were placed in this phase due to their proximity to other dated Romano-British features and the fact that they are not uncommon on sites of this date. If the possible sunken feature buildings were to be of Romano-British date, they would be of local significance. There is the possibility that the possible sunken feature buildings are of Anglo-Saxon date, in which case they would potentially be of up to regional significance. It is noted that during excavations in 2000-2002, carried out as part of the CTRL, five early Anglo-Saxon sunken feature buildings were recorded in the vicinity of Northfleet Roman villa (TQ67SW1524).

1.13 As stated in the trial trenching evaluation report, based on the currently available information, the archaeological assemblage is considered to be of local significance. Information gained from further fieldwork and analyses may result in some of the archaeological remains being found to be of regional significance.

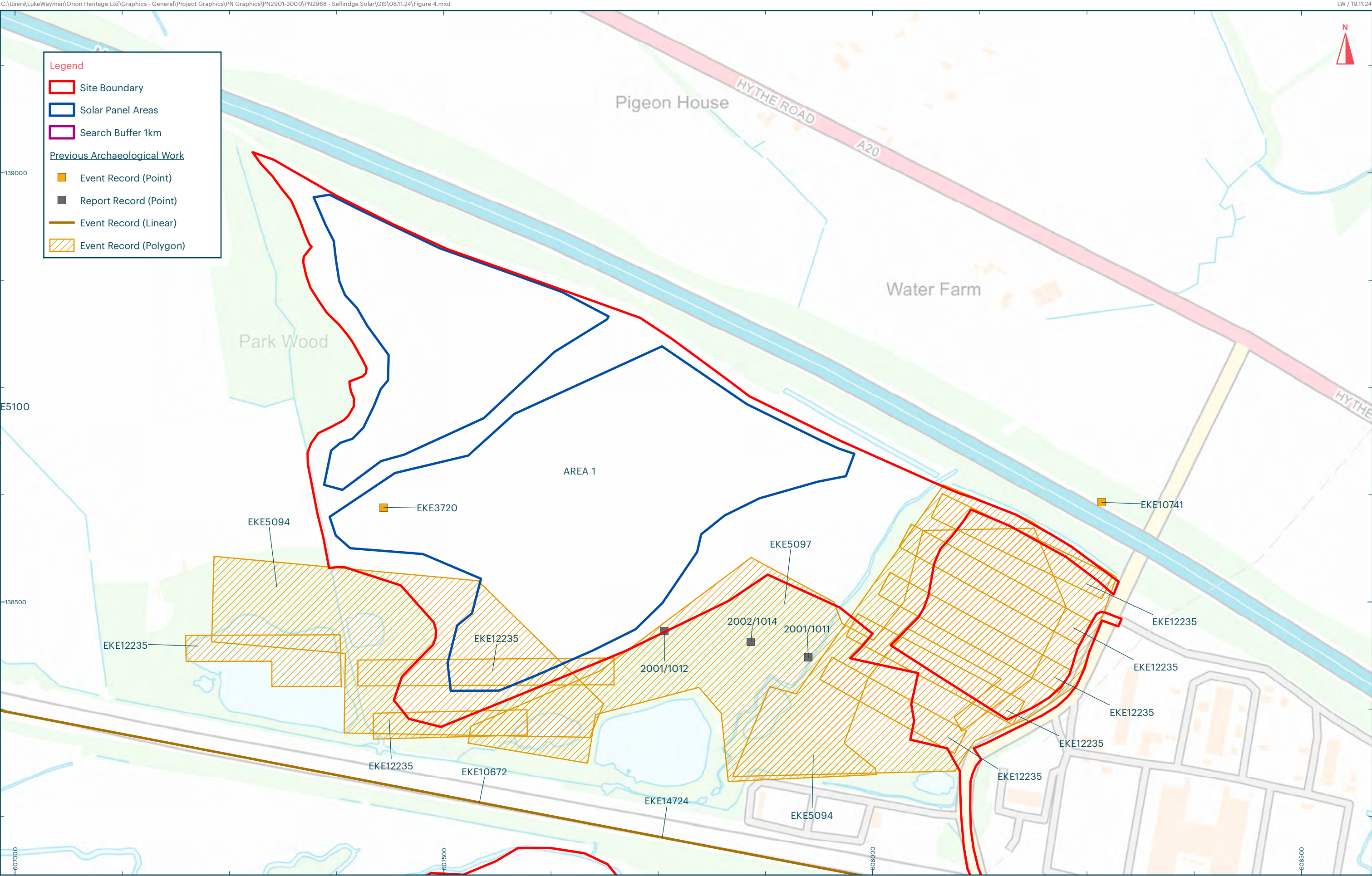
1.14 These remains were recorded during the assessment, survey and evaluation trenching that was undertaken to support the chapter 12 of the ES and the heritage element of the SEI. The conclusions on the significance of the assets are in line with the ES chapter but have been revised slightly in places where the evaluation trenching provided more detailed data on the geophysical survey results.



Title:
Figure 1: HER Records
Address:
East Stour Solar Farm

Scale at A3: 1:8,000
0 250m





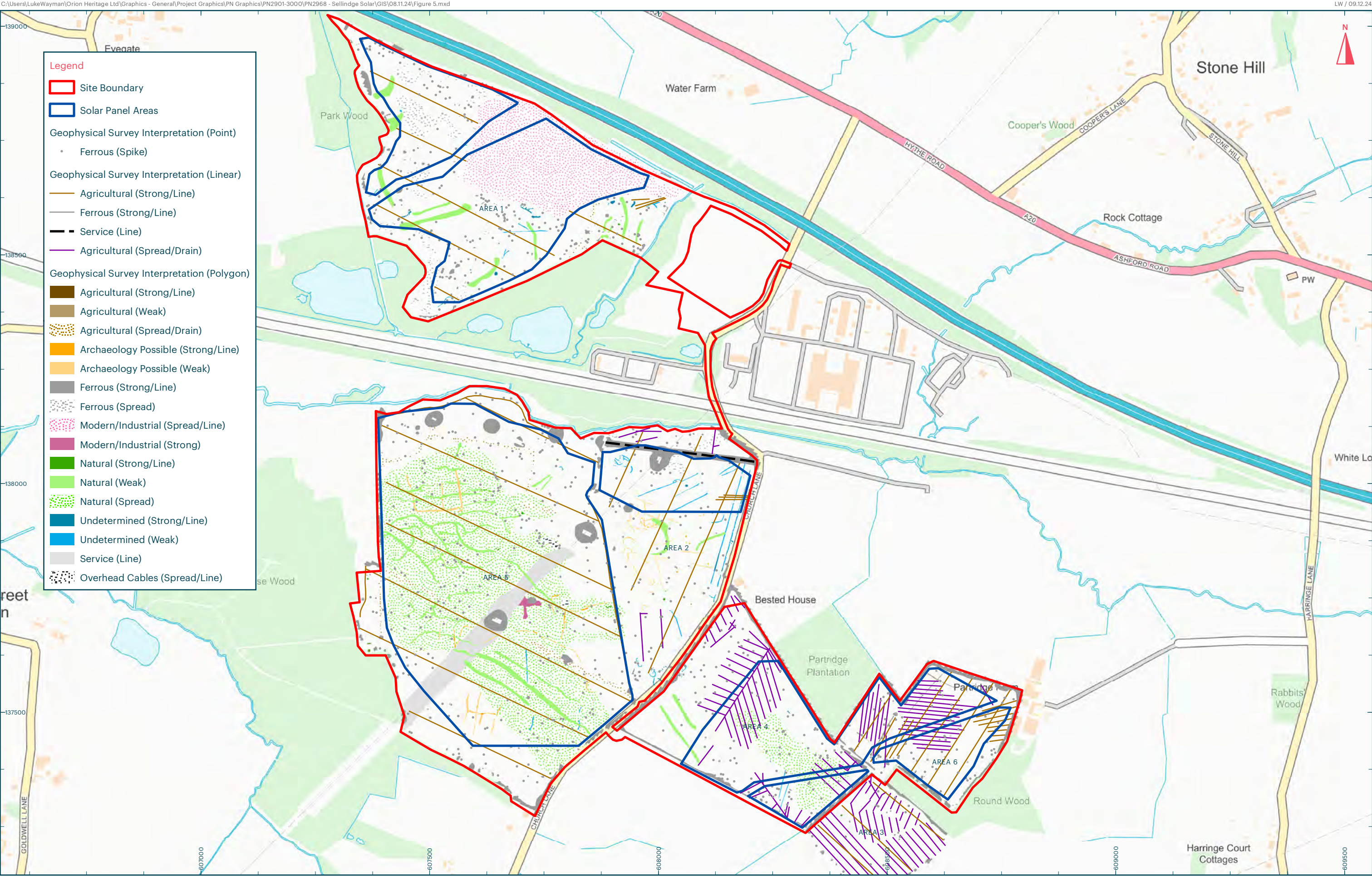
Title:
Figure 2: Previous archaeological investigations

Address:
East Stour Solar Farm

Scale at A3: 1:4,000

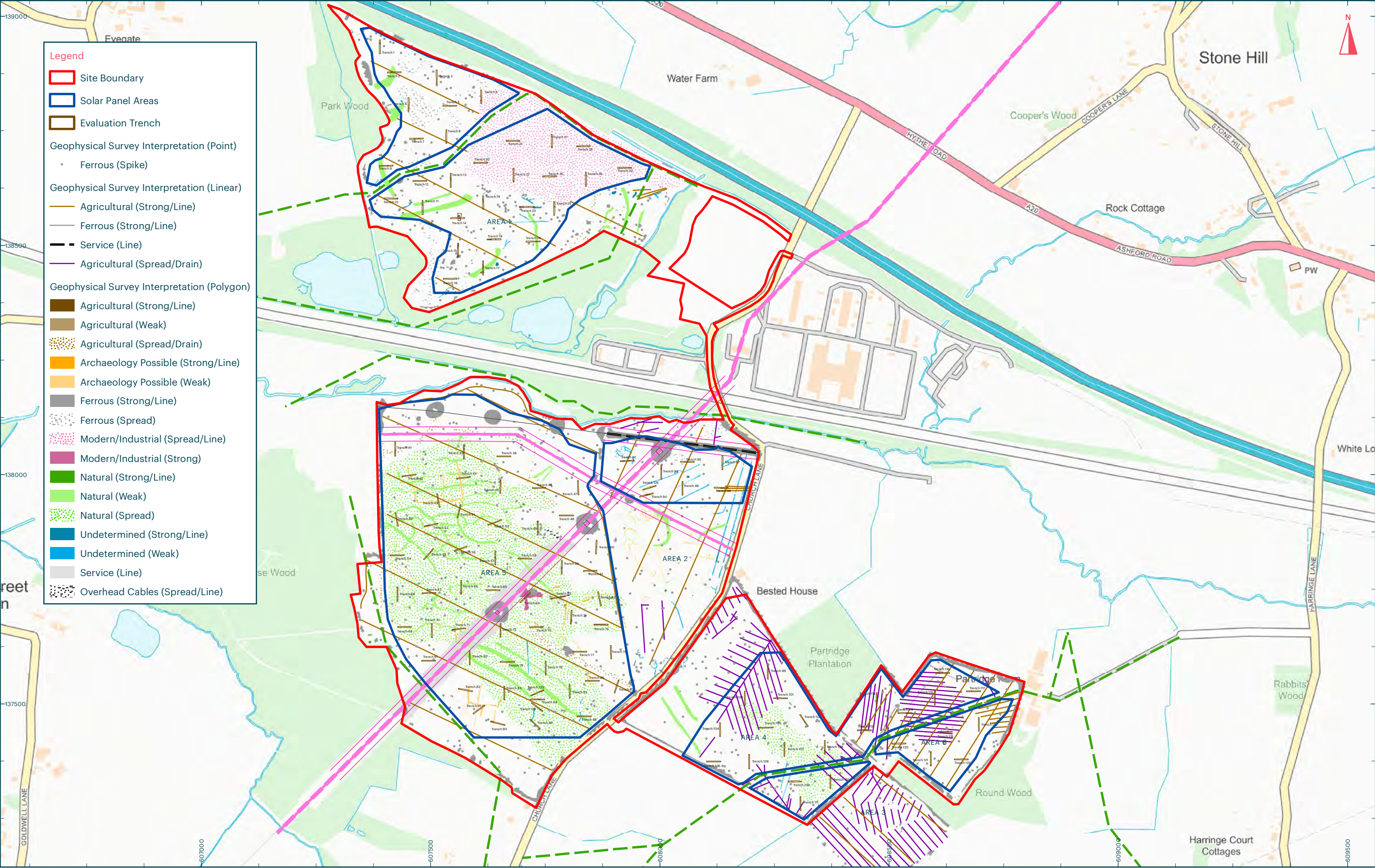
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Title:
Figure 3: Geophysical survey interpretation plot

Address:
East Stour Solar Farm



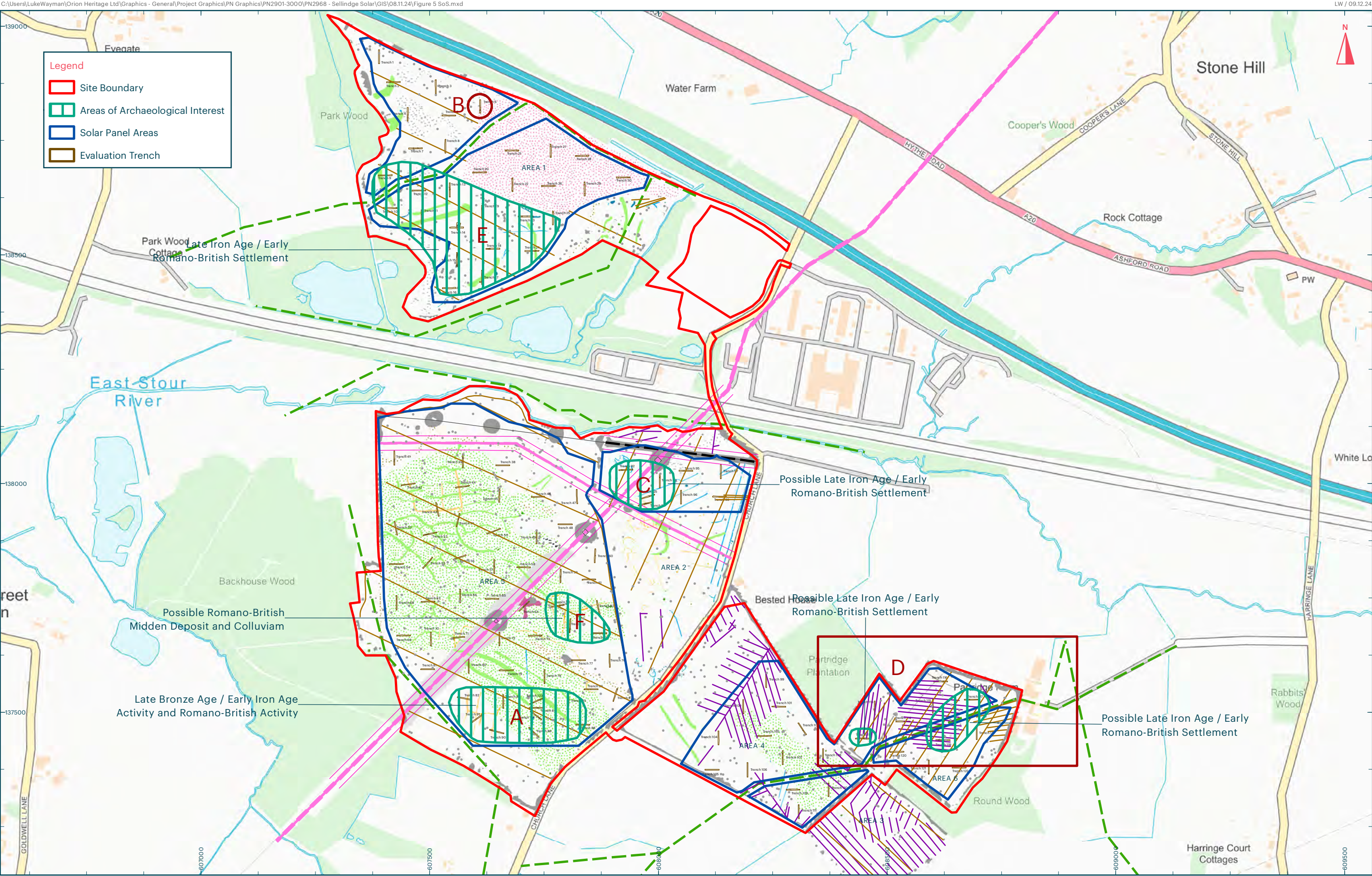
Title:
Figure 4: Evaluation Trench Plan overlaid on the geophysical survey results

Address:
East Stour Solar Farm

Scale at A3: 1:7,500

0 250m





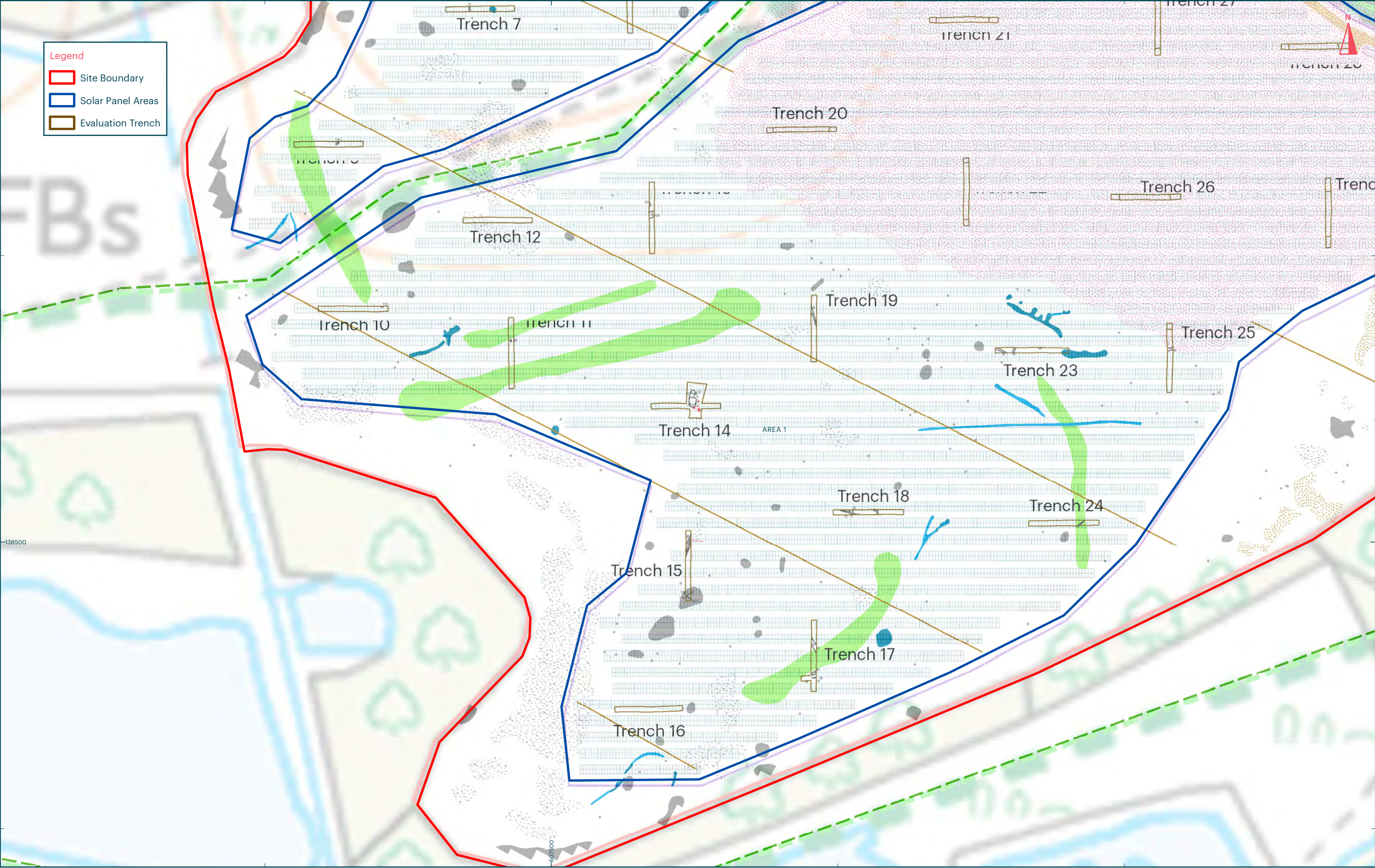
Title:
Figure 5: Areas of archaeological interest overlaid on the evaluation trench plan

Address:
East Stour Solar Farm

Scale at A3: 1:7,500

0 250m





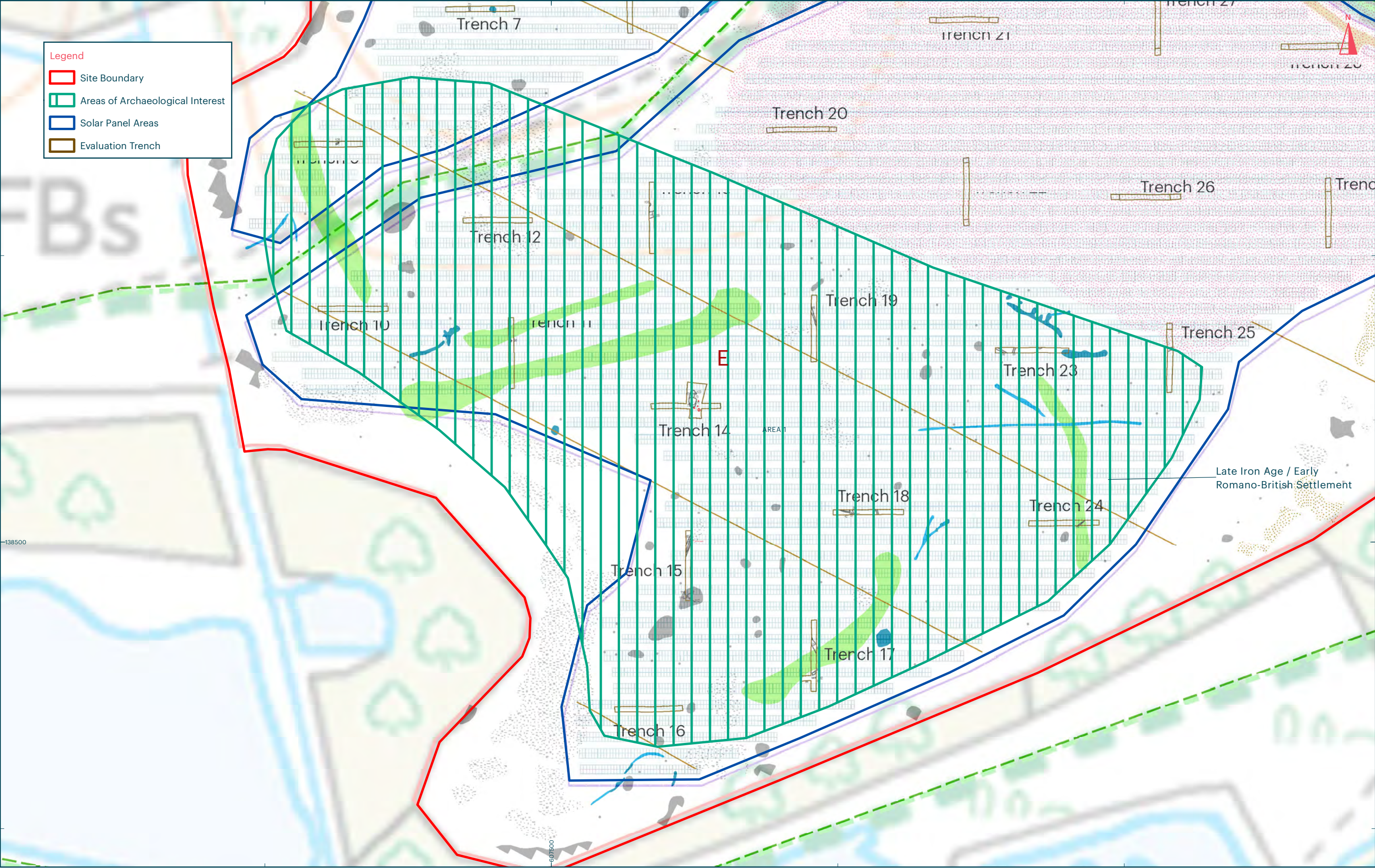
Title:
Figure 6a: Areas of archaeological interest shown with the proposed development - Northern Area

Address:
East Stour Solar Farm

Scale at A3: 1:1,500

0 50m





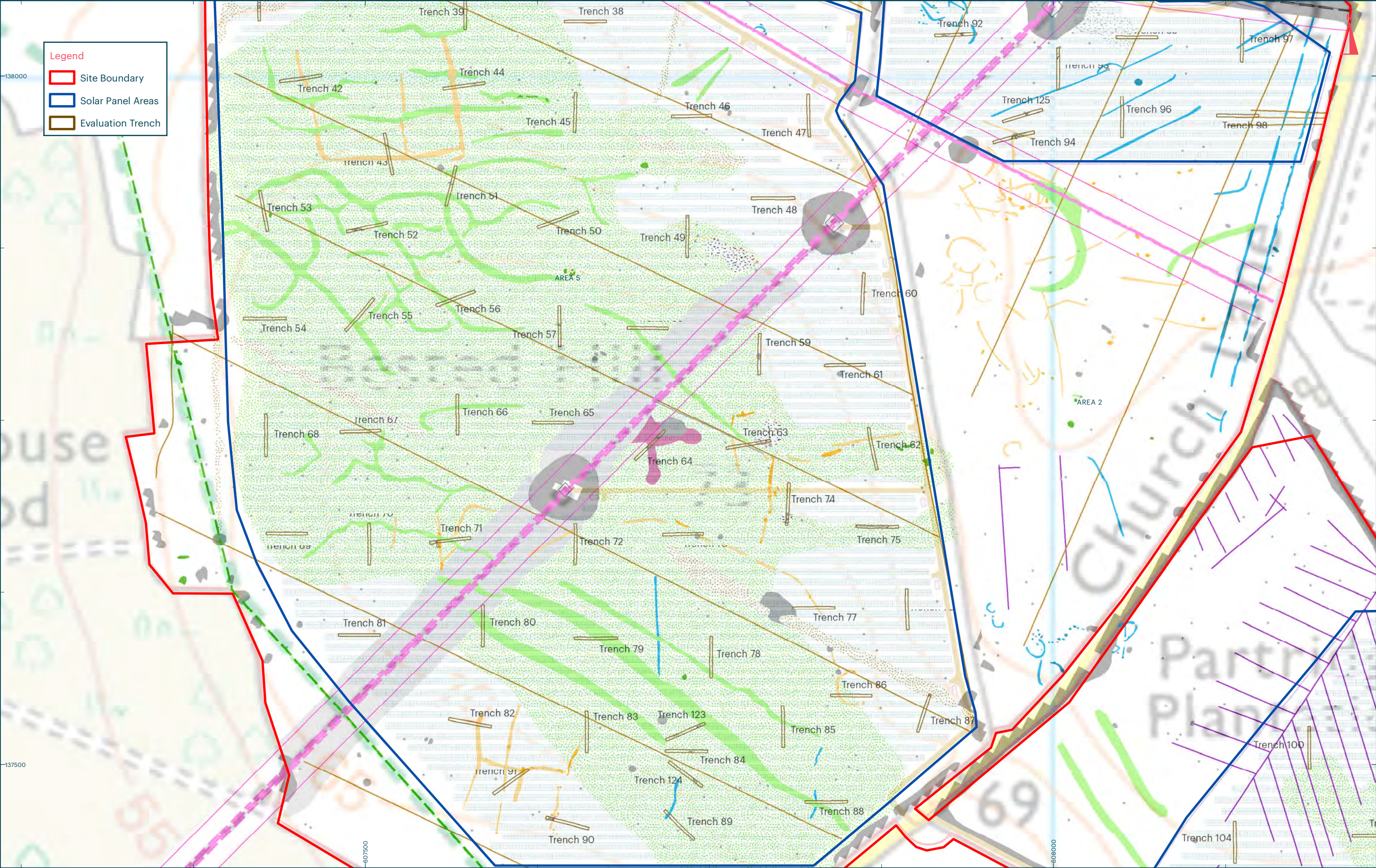
Title:
Figure 6b: Areas of archaeological interest shown with the proposed development - Northern Area

Address:
East Stour Solar Farm

Scale at A3: 1:1,500

0 50m





Title:
Figure 7a: Areas of archaeological interest shown with the proposed development - Central Area

Address:
East Stour Solar Farm

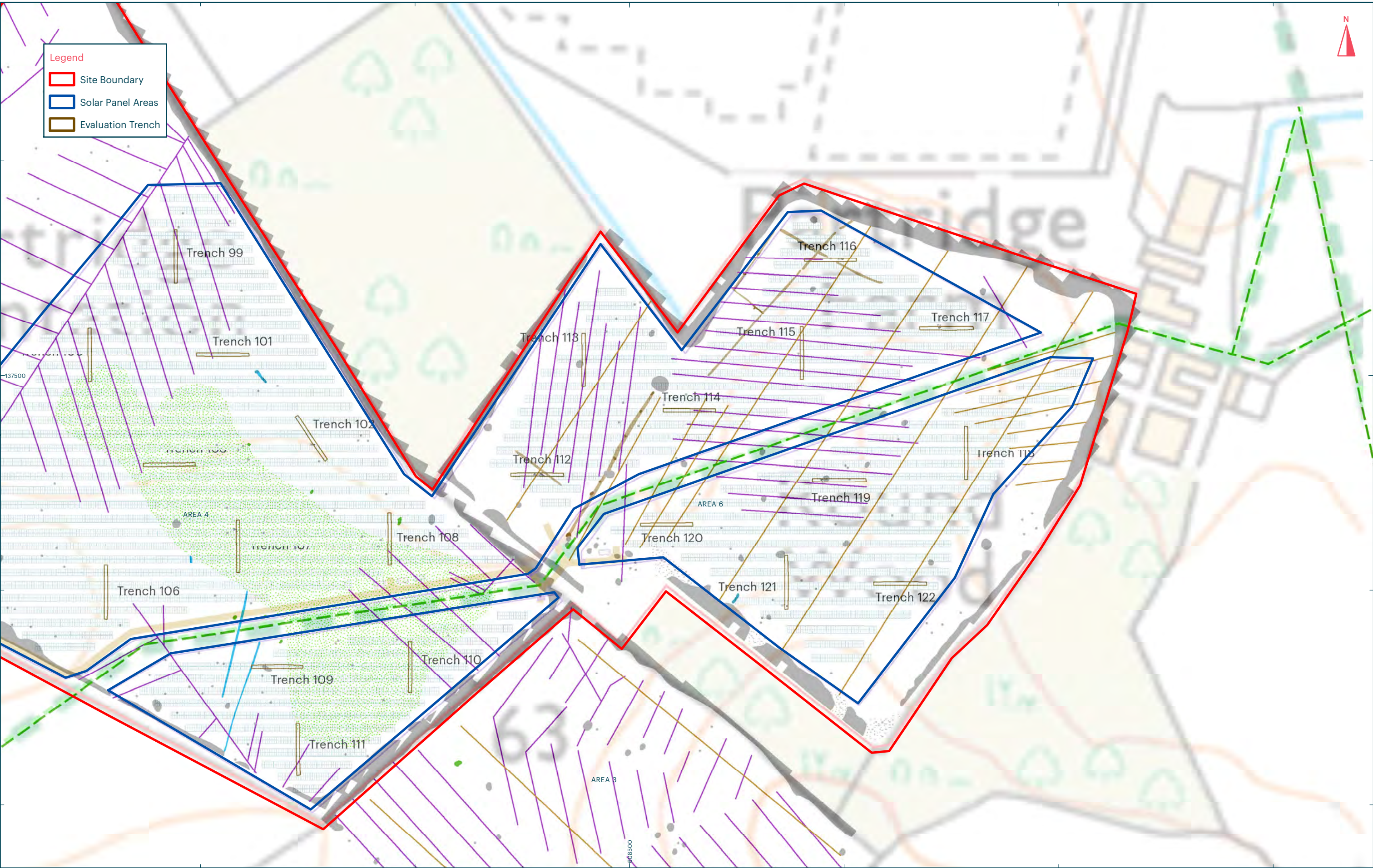
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Title:
Figure 7b: Areas of archaeological interest shown with the proposed development - Central Area

Address:
East Stour Solar Farm



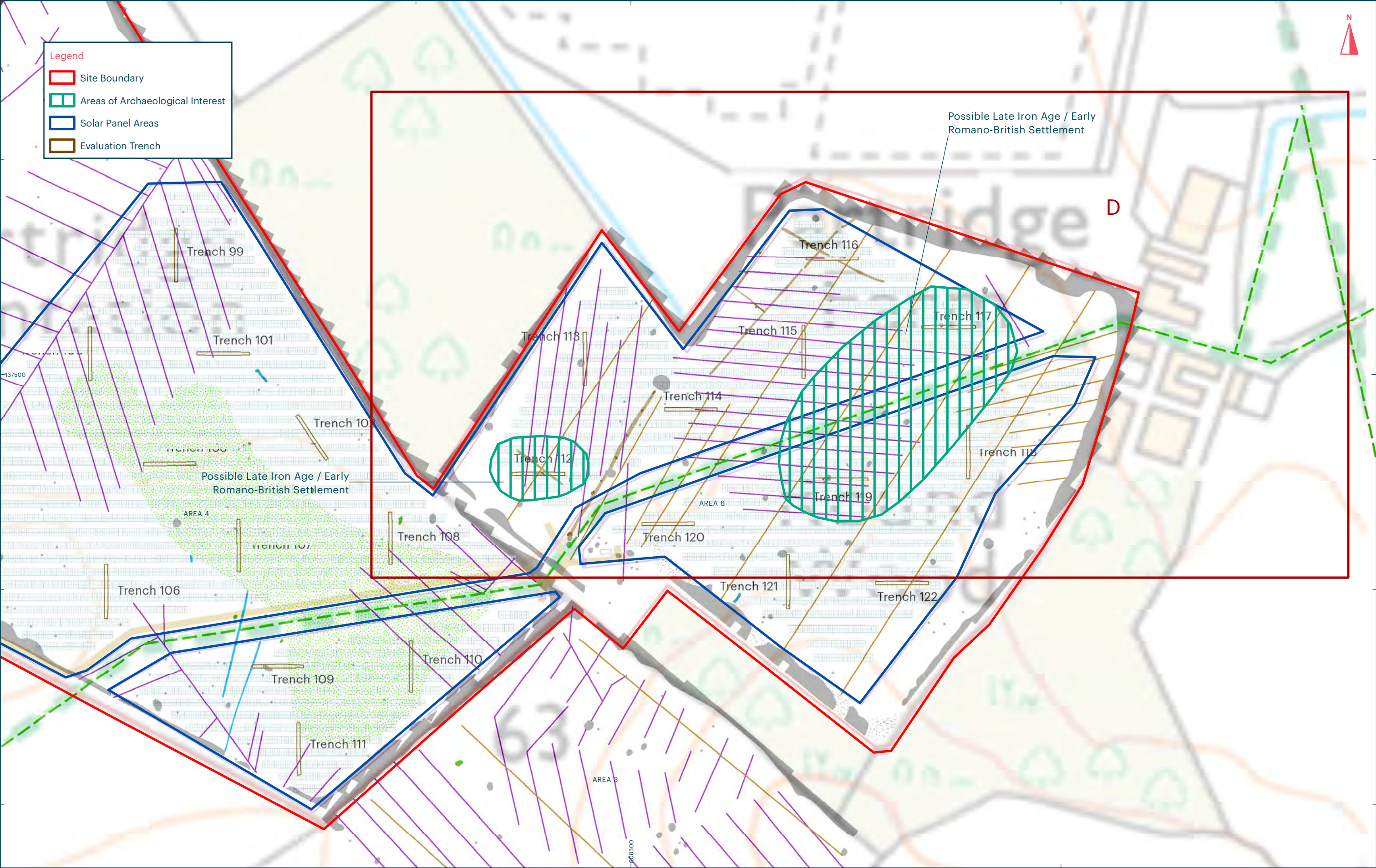
Title:
Figure 8a: Areas of archaeological interest shown with the proposed development - Eastern Area

Address:
East Stour Solar Farm

Scale at A3: 1:2,000

0 50m





Title:
Figure 8b: Areas of archaeological interest shown with the proposed development - Eastern Area

Address:
East Stour Solar Farm

Scale at A3: 1:2,000

0 50m



This Statement of Common Ground is agreed between:

Eversheds Sutherland (International) LLP on behalf of **the Appellant**

Eversheds Sutherland (International) LLP

and

Ashford Borough Council

Ashford Borough Council

on 7 January 2025.