

STONESTREET GREEN SOLAR **, KENT**

LAND AT ALDINGTON, SOUTHEAST OF ASHFORD

Heritage Statement

VERSION 1

Commissioned by Aldington & Bonnington Parish Council

November 2024

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PROJECT INFO:

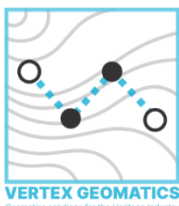
Site Code SGS24 | OSGB36 COORDS: E606118, N137629 | NGR TR 06118 37629

DISTRICT Kent | LOCAL AUTHORITY Kent CC | OASIS Ref TBC | Archive Repository TBC

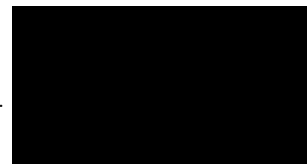
PROJECT TEAM:

Project Director Peter Spencer

Author Peter Spencer [C1fA6388] | Graphics Peter Spencer



Approved by Peter Spencer.....



QUALITY ASSURANCE	
SITE CODE	SGS24
ACCESSION CODE	TBC
CLIENT CODE	TBC
PLANNING APPLICATION REF	EN010135
OSGB36 NGR (CENTROID)	E606118, N137629
NATIONAL GRID REF	TR 06118 37629

VERSION	STATUS	PREPARED BY	DATE	MODIFICATION
0.1	INTERNAL DRAFT	PTS	29.11.2024	Initial draft
0.2	INTERNAL DRAFT	PTS	03.12.2024	Edited in-line with SL comments
0.3	INTERNAL DRAFT	PTS	04.12.2024	Figures added
1.0	EXTERNAL	PTS	06.12.2024	External version released

SUMMARY

The following document presents the results of a Heritage Assessment in relation to the proposed development of the Stonestreet Green Solar project (EPL 001 Ltd / EN010135) located near Ashford, Kent.

The report has been produced by Peter Spencer BA MA MCIfA on behalf of the Aldington & Bonnington Parish Council (ABPC) and assesses the evidence for archaeological potential in relation to the proposed development area (hereafter referred to as PDA), a 191ha area of land situated within the civil parishes of Sellindge, Aldington, Mersham, and Smeeth.

This assessment draws from several existing heritage assessments undertaken during the Environmental Impact Assessment (EIA) scoping phase and is intended to provide a holistic overview regarding known/unknown archaeological potential within the PDA and the subsequent impact such a development may have.

Prior assessment has identified a rich variety of possible archaeological features, sites, and/or deposits within the PDA. The majority of these pertain to former land boundaries and agricultural practices ranging in date from the Medieval-Modern Period. Within the local area of the Aldington Ridge the LiDAR assessment identified several areas of morphological variance which when reviewed in conjunction with the existing geophysical survey data and results of the archaeological evaluation potentially depict a zone of anthropogenic activity possibly associated with a roadside settlement dating from the Iron Age / Romano-British (IA/RB) transition phase onwards.

Within the East Stour River basin, in which the northern extent of the PDA is situated assessment of the LiDAR data identified a number of relict fluvial channels associated with the East Stour and earthworks which may be associated with agriculture and water management.

Taken with the growing body of evidence derived from the KCC HER, PAS Database, Geophysical Survey, and limited evaluation it is clear the PDA is situated within an area of continuous anthropogenic activity dating from the Prehistoric Period onwards with a particular emphasis upon the IA/RB-Medieval Periods.

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GLOSSARY OF ABBREVIATIONS

ABC	Ashford Borough Council
ABPC	Aldington & Bonnington Parish Council
BA	Bronze Age
CIfA	Chartered Institute for Archaeologists
COORDS	Coordinates
DBA	Desk Based Assessment
DEFRA	Department for Environment, Food, and Rural Affairs
DEM	Digital Elevation Model
DSM	Digital Surface Model
DTM	Digital Terrain Model
EA	Environment Agency
EIA	Environmental Impact Assessment
EPSG	European Petroleum Survey Group
ha	Hectare
HE	Historic England
HER	Historic Environment Record
IA	Iron Age
KCC	Kent County Council
LiDAR	Light Detection and Ranging
MoRPHE	Management of Research Projects in the Historic Environment
NGR	National Grid Reference
OS	Ordnance Survey
PAS	Portable Antiquities Scheme
PDA	Proposed Development Area
PM	Post-Medieval
RB	Romano-British
RMSE	Root Mean Squared Error
TP	Test Pit
TR	Trench
UKBAP	UK Biodiversity Action Plan
WS	Window Sample

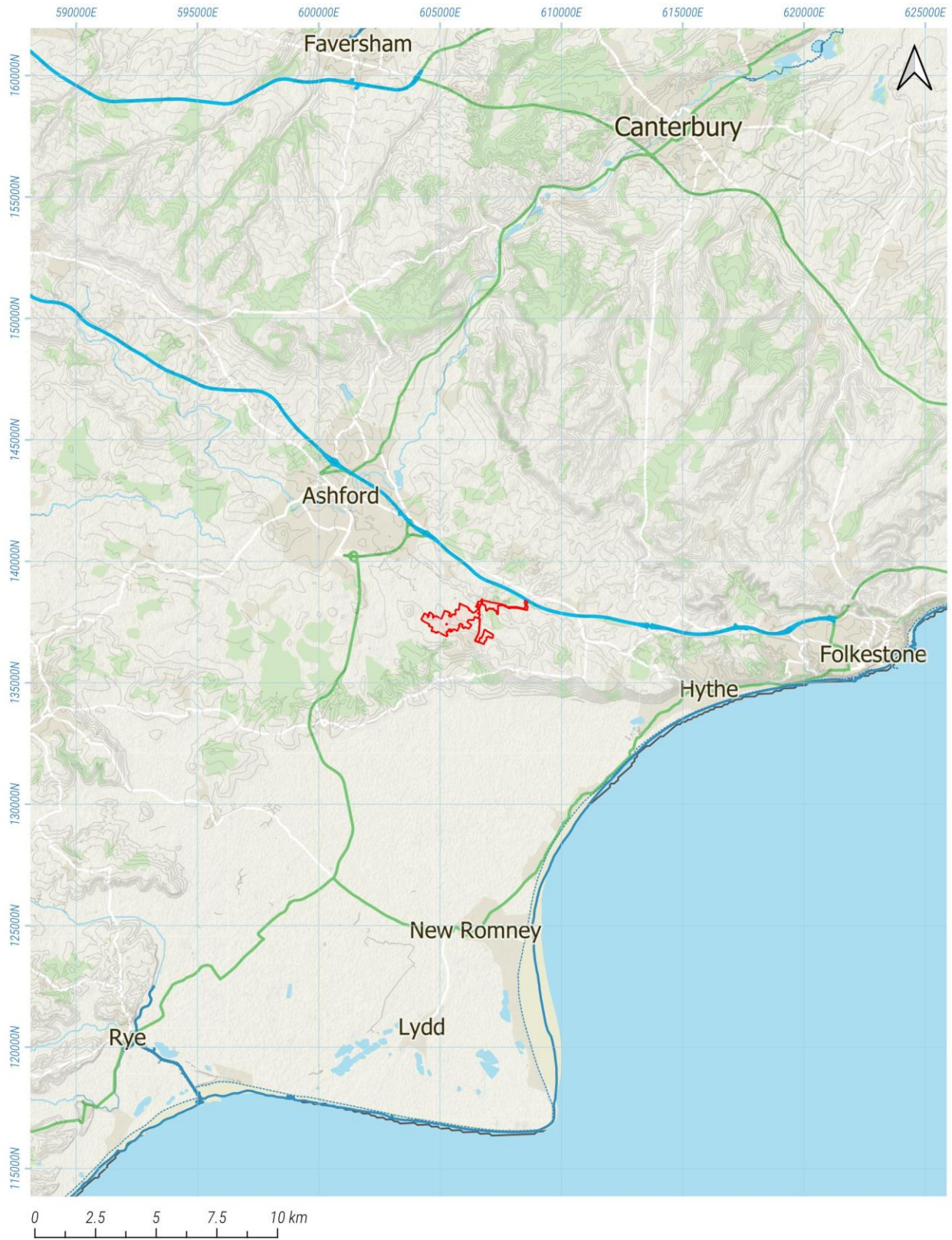


Figure 1: Location of proposed Solar Farm (regional)

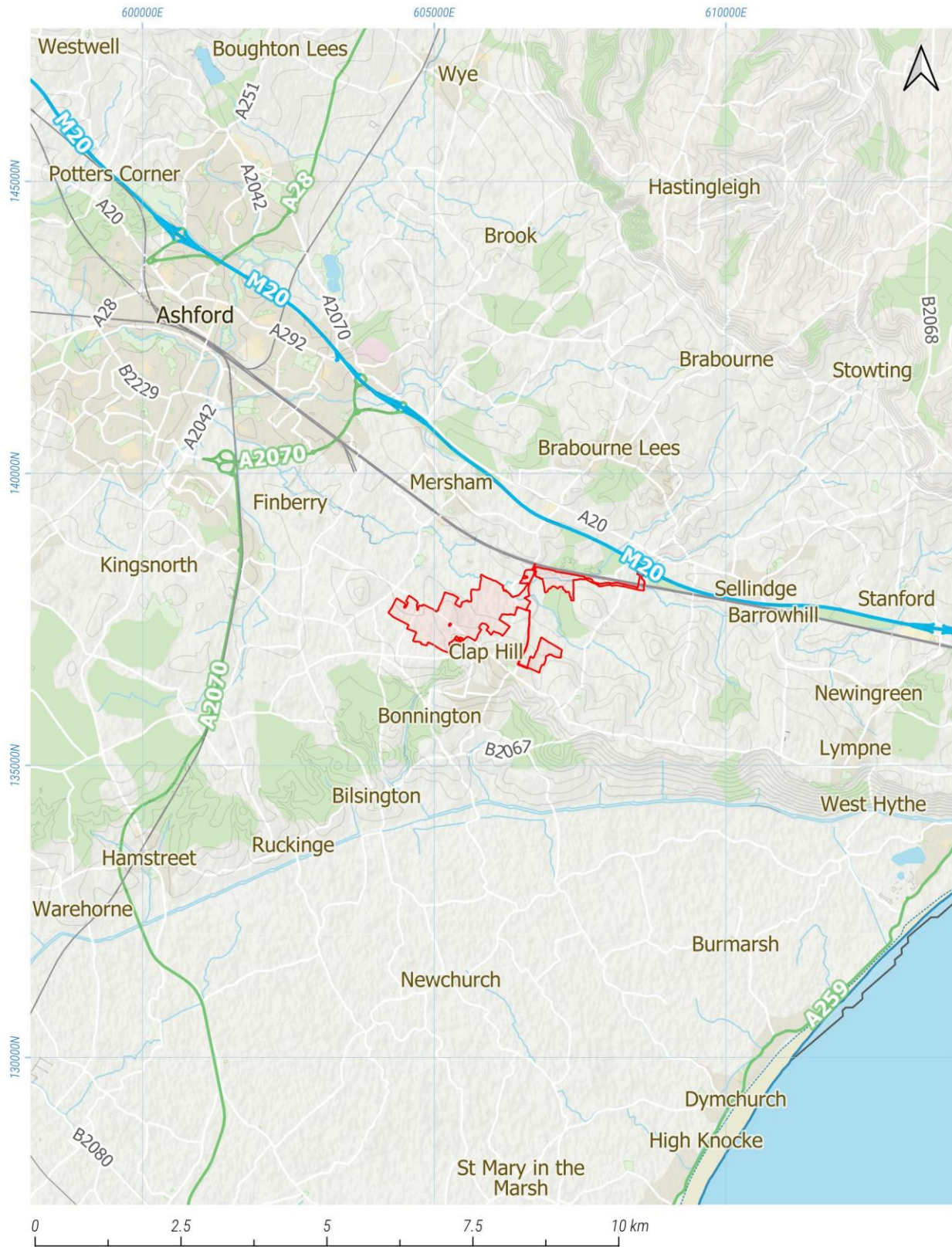


Figure 2: Location of proposed Solar Farm (local)

STONESTREET GREEN SOLAR

LAND AT ALDINGTON, SOUTHEAST OF ASHFORD, KENT

Heritage Statement

VERSION 1

1. INTRODUCTION

The following document comprises a statement as to the potential for known and unknown archaeological assets within the proposed development area (PDA) of the Stonestreet Green Solar project (EPL 001 Ltd / EN010135).

The document has been produced by Peter Spencer BA MA MCifA on behalf of the Aldington & Bonnington Parish Council (ABPC) and assesses the evidence for archaeological potential in relation to the proposed development area (hereafter referred to as PDA), a 191ha are of land situated within the civil parishes of Sellindge, Aldington, Mersham, and Smeeth.

This assessment draws from several existing heritage assessments undertaken during the Environmental Impact Assessment (EIA) scoping phase and is intended to provide a holistic overview regarding known/unknown archaeological potential within the PDA and the subsequent impact such a development may have.

Please note coordinates are given in the OSGB36 coordinate system (ESPG:27700) and where possible asset and event information is given using the Kent County Council HER reference system.

2. ARCHAEOLOGICAL AND HISTORICAL BACKGROUND

A full description of the archaeological and historical background has been produced by Wardell Armstrong following a Desk Based Assessment (DBA). The DBA lists and describes known archaeological and heritage assets within the PDA whilst assessing archaeological potential through the holistic examination of archaeological geophysics (magnetometry); DEFRA LiDAR data; Historic Mapping; and Cultural Inventory records.

The results can be found in the following EIA documentation:

Table 1: EIA Documentation - Cultural Heritage

DOCUMENT OF ORIGIN	TITLE	URL
Environmental Statement	5.2 Environmental Statement Volume 2: Main Text Chapter 7: Cultural Heritage	APP-031
Environmental Statement	5.3 Environmental Statement Volume 3: Figures Chapter 7: Cultural Heritage Figures 7.1 - 7.11	APP-048
Environmental Statement	5.4 Environmental Statement Volume 4: Appendices Chapter 7: Cultural Heritage Appendix 7.1: Archaeological Desk Based Assessment Part 1 of 2	APP-070
Environmental Statement	5.4 Environmental Statement Volume 4: Appendices Chapter 7: Cultural Heritage Appendix 7.1: Archaeological Desk Based Assessment Part 2 of 2	APP-071
Environmental Statement	5.4 Environmental Statement Volume 4: Appendices Chapter 7: Cultural Heritage Appendix 7.2: Heritage Statement	APP-072
Archaeological Management Strategy	7.17 Archaeological Management Strategy	APP-162
Environmental Statement	Post Submission Changes - 5.2(A) Environmental Statement Volume 2: Main Text Chapter 7: Cultural Heritage	AS-011

PRIOR ARCHAEOLOGICAL WORK

Several phases of archaeologically orientated assessment work have been undertaken as part of the existing EIA Scoping stage for the proposed development.

OASIS REF	Description	Type	Originator	Date
N/A	Desk Based Assessment (DBA)	DBA	Wardell Armstrong	OCT 2022; FEB 2024
magnitud1-508316	Magnetometry Survey	Geophysics Survey	Magnitude Surveys	JAN 2022-DEC 2022
wardella2-518093	Archaeological Trial Trenching	Archaeological Evaluation	Wardell Armstrong	AUG 2023
wardella2-518093	Palaeoenvironmental Sampling	Archaeological Evaluation	Wardell Armstrong	AUG 2023
wardella2-513328	Watching Brief	Archaeological Monitoring	Wardell Armstrong	FEB 2023

OASIS REF	Description	Type	Originator	Date
N/A	Archaeological Landscape Assessment	DBA	Wardell Armstrong	MAY 2024
N/A	LiDAR Assessment	DBA	Vertex Geomatics	OCT 24

SUMMARY

Several phases of archaeological research and investigation have been undertaken as part of the EIA scoping process. Reference to and discussion of the results thereof can be found within the chapter 6: 'Archaeological Potential and Value' of the 'Environmental Statement Vol.4 Appendix 7.1: Archaeological Desk Based Assessment', whilst a discussion of archaeological potential across the PDA can be found in Chapter 7: 'Assessment Conclusion' of the same volume.

Table 2: EIA Sources of Archaeological Information

DOCUMENT OF ORIGIN	CHAPTER	PAGE No.
5.2 Environmental Statement Volume 4: Appendix 7.1 Archaeological Desk based Assessment	5:Baseline Information (5.5-5.17)	27-55
5.2 Environmental Statement Volume 4: Appendix 7.1 Archaeological Desk based Assessment	6: Archaeological Potential and Value	56-66
5.2 Environmental Statement Volume 4: Appendix 7.1 Archaeological Desk based Assessment	7: Assessment Conclusion	67-69

The potential for archaeological activity within the site has been demonstrated through the following:

1. The existence of 109 Find Spots and 35 Known sites of archaeological interest within 1km of the PDA as recorded within the KCC Historic Environment Record (HER). These primarily relate to Romano-British, Early Medieval, and Medieval settlement and agricultural activity, with distinct clustering around the former Roman Road (MKE75998 - Fields 6, 10, 12, 13), Field 29 and the proposed Cable Route Corridor.
2. The existence of 2 find spots comprising treasure within 1km of the PDA as recorded in the Portable Antiquities Scheme (PAS) database. Of these KENT-110E2C (ID: 1175209) consists of an incomplete 1st Century AD cast silver Roman finger ring of Guiraud type 3g found via metal detector approximately 985m south of Fields 7 and 8 near the village of Bonnington.
3. Vertical aerial photography and satellite imagery have previously shown the existence of a variety of potential cropmarks and soil shadows present across the PDA, these include MKE44044 a 42x44m square enclosure situated within field 15 first identified in 2010; MKE90760 a ring-ditch situated 140m to the east of Field 20.
4. Magnetometry survey undertaken in 2022 identified a wide variety of features within the PDA including former field boundaries, enclosures, route-ways, and former fluvial channels associated with the East Stour River.
5. Subsequent archaeological evaluation of the aforementioned geophysical survey results confirmed the presence of Romano-British features and/or material remains within the vicinity of the former Roman Road (MKE75998). Prior archaeological investigation has identified a

clustering a Romano-British remains near the settlement of Clap Hill; a possible Romano-British iron works north of Round Wood 100m to the south of the PDA; Prehistoric flint and pottery scatters, BA/IA/RB field systems, and Medieval remains within and around the footprint of the Sellingde Substation site.

Potential for archaeological activity was found to primarily relate to the Iron Age- Medieval periods with a particular emphasis upon Romano-British settlement, industrial, and agricultural activity centred upon the Aldington Ridge.



Figure 3: Silver Roman period finger ring recovered near the village of Bonnington [PAS Database]

3. DISCUSSION OF POTENTIAL

Archaeological assessment has identified the presence of archaeological features, material, and/or deposits within the PDA. Largely undertaken by Wardell Armstrong Ltd on behalf of EPL 001 Ltd during the EIA scoping phase, such assessment comprised a number of complimentary non-invasive and invasive methods ranging from historic map regression and geophysical survey to archaeological evaluation and palaeoenvironmental sampling. The collected evidence for archaeological activity ranges from a wide variety of sources:

Table 3: Summary of Archaeological Evidence

EVIDENTIAL SOURCE	DESCRIPTION
KCC HER Records	The HER records 323 Heritage assets within 1km of the PDA perimeter. These primarily relate to individual findspots comprising Iron Age – Medieval period material, however a number of listed buildings and archaeological sites are also included.
Magnetometry Survey	The survey highlighted a number of potential features situated throughout the PDA. These include numerous possible enclosures and boundaries within the area of the Aldington Ridge as well as several former water courses within the river basin of the East Stour. Several of the possible features correspond well with find spots recorded within the KCC HER.
Historic Landscape Characterisation	Identified the present landscape within the PDA to be largely of 17/18 th Century origin.
Prior Archaeological Excavation	Excavations at Aldington have previously identified a variety of Romano-British features and material, whilst those at Clap Hill have identified a number of post-medieval industrial and structural remains. Within the wider landscape a number of prominent Romano-British Barrows and an extensive Barrow Cemetery have been identified, whilst to the north of the London and Dover railway line a number of Prehistoric field systems and lithic scatters have been identified.
EIA Scoping Evaluation	Intrusive evaluation comprised a 0.8% sample of the overall PDA. Trenches were targeted within the footprint of the proposed project sub-station and immediately to the north and south of the projected Roman Road. Despite being such a low sample size the trenches returned evidence of Romano-British period activity within the area of the Aldington Ridge.
Aerial Imagery and LiDAR analysis	Aerial Imagery and DEFRA LiDAR data record a complex sequence of potential features throughout the PDA. Although the majority may relate to post-medieval agriculture and natural drainage there is a significant number of features of potential archaeological origin.

The majority of features identified during the EIA scoping phase appear to pertain to former land boundaries and agricultural practices ranging in probable date from the Early Medieval-Modern Period. Within the local area of the Aldington Ridge LiDAR assessment identified several areas of morphological variance which when reviewed in conjunction with the existing geophysical survey data and results of the archaeological evaluation potentially depict a zone of anthropogenic activity possibly associated with a roadside settlement dating from the IA/RB transition phase onwards.

Within the East Stour River basin, in which the northern extent of the PDA is situated, assessment of LiDAR data identified a number of relict fluvial channels associated with the East Stour and earthworks which may be associated with agriculture and water management. The probable date of origin for these features is currently unknown, however evidence from past archaeological investigations within the local surrounding area has identified a rich landscape of Prehistoric-Medieval period anthropogenic activity with find spots in the immediate area denoting several IA/RB and Medieval period artefacts.

Geophysical survey undertaken within the PDA has identified a sequence of anthropogenic and natural features of interest including several potential enclosures, remnant field systems, and possible route-ways. Several features initially identified as natural may in hindsight hold archaeological potential including the partial terracing of the Aldington Ridge and the identification of former water courses associated with the East Stour River Basin.

Taken with the growing body of evidence derived from the KCC HER, PAS Database, Geophysical Survey, and limited evaluation it is clear the PDA is situated within an area of continuous anthropogenic activity dating from the Prehistoric Period onwards with a particular emphasis upon the IA/RB and Medieval Periods. This conforms well to knowledge of IA/RB activity within the wider region with extensive Roman settlements having been identified at Ashford, Lympne, and Dover. These settlements were linked by the Roman Road projected to bisect the PDA suggesting it was a route of some importance. Investigation at these sites has uncovered evidence for a nascent Iron industry within the local area that was heavily capitalised and expanded upon by the Romans. Such evidence has also been identified within the immediate area of the PDA with a possible Romano-British bloomer being identified near Bested Hill.

Interpretation of the archaeological potential of the PDA can be described thus:

THE ALDINGTON RIDGE

LiDAR assessment and Geophysical Survey have identified a contiguous area of morphological variation upon the brow and upper slopes of the Aldington Ridge immediately adjacent to the projected route of the former Roman Road (MKE4713). This 46.3ha area extends across Fields 4, 5, 6, 8, 9, 10, 12, 13, and 17.

The area is also located within the extent of the aforementioned Wealdon Clay, a substrate that previous archaeological investigation within the region has identified as displaying a high preponderance of IA/RB period settlement remains.

Archaeological geophysics within this area has identified at least one IA/RB enclosure and associated anthropogenic activity within this area (Field 4). Further evidence for activity during this period has been

recovered through archaeological evaluation and suggests the potential presence of an agricultural community engaged in arable farming and Iron working with settlements being located upon areas of higher ground away from annual flooding whilst the low-lying river basins were farmed. At present it is unclear whether sections of this area may have been subjected to quarrying in the 19th century which may account for the morphological variation.

FORMER AGRICULTURAL LANDSCAPE

To the South and North of the Aldington Ridge the land is relatively flat, LiDAR assessment and geophysical survey identified a range of predominantly linear features within these areas that morphologically are reminiscent of land boundaries, field systems, and possible route-ways. Whilst the existing DBA (Wardell 2024) identified that many of these originate in the Post-Medieval agricultural landscape several features may relate to early Medieval Strip Farming or earlier agricultural practices. The KCC HER records a possible ring-ditch in the fields immediately to the southeast of Fields 20-22 whilst a review of the existing satellite imagery reveals a complex sequence of linear features denoting a possible prehistoric field system within the same area.

Several possible sub-rectangular enclosures of varying dimensions have also been identified within this landscape from the LiDAR data. This corresponds well with mapping of potential sites derived from satellite imagery of the area with the KCC HER recording an enclosure in Field 15 (MKE44044) and a large sub-rectangular enclosure being identified during development works upon Bested Hill immediately to the southeast of field 29.

EAST STOUR RIVER BASIN

Situated within the northern extent of the PDA the East Stour River Basin is characterised by a series of relict fluvial channels, anthropogenic earthworks, and the probable remains of prior field systems. Archaeological investigation within the local area has identified a rich background of activity stretching from the Prehistoric period to Modern day with evidence of the basin being farmed in the past.

The area has been characterised by the Stour Basin Palaeolithic Project as being of interest, although the incidence of encountering artefactual material of this period is considered low. At the time of writing the aforementioned fluvial channels have not been considered within the existing scoping framework and as such the date of origin for such features is currently unknown.

Within fields 25, 26, and 29 there is evidence of anthropogenic earthworks denoting a managed riverine landscape. Find spots within field 29 suggest this may be of IA/RB origin (KME55807, MKE55802).

CONCLUSION

Assessment has identified a potentially rich archaeological landscape within the PDA with evidence for a variety of possible site-types and periods being identified. Such interpretation sits well within the larger framework of archaeological evidence collected as part of the EIA scoping phase for the Solar Farm project, with the LiDAR assessment, Geophysical survey, and limited archaeological evaluation complimenting one another to deliver a holistic view of an area of IA-Medieval period agricultural settlement and activity.

In particular the PDA's location along the projected Roman Road connecting the settlements and industrial activity in Ashford with those in Lympne and Dover suggests the area may have played a role during the period in the establishment of the Iron industry of the time (A possible RB-Medieval Iron Works has been identified Just north of Rabbits wood MKE3825 immediately outside the PDA, whilst evidence of Iron working was recovered from evaluation trenching in field 4).

Roman roadside settlements are now well known from archaeological investigation in the UK with one having previously been identified at Westhawk Farm in Ashford. As such it is entirely possible that the remains identified during the scoping phase may indicate a similar settlement within the immediate-local area.

Furthermore artefactual evidence recorded in the KCC HER identifies the area as of having continued anthropogenic activity in the Early Medieval-Medieval periods with particular concentrations of material having been identified at Harringe Court Farm, Aldington, Clap Hill, and south of Evegate Manor.

Whilst the EIA scoping documentation has generally valued the archaeological importance of such remains as low it is currently unclear as to how this conclusion was reached. The land within the PDA has a proven track record of producing archaeological material whilst recent non-intrusive and intrusive investigation has confirmed the presence of archaeological material and features. Within the wider local area prior archaeological investigation has identified significant deposits from the Prehistoric periods, IA/RB periods, and early Medieval periods with Romano-British archaeological evidence being found as close as the settlement of Clap Hill.

Existing archaeological research has identified this region of the UK as playing a key role in the Roman invasion and subsequent abandonment of Britain. The settlements at Lympne and Dover were important socio-economic and military centres which oversaw and governed the nascent agricultural and industrial industries within the regional area which were to prove vital to the on-going function of the Roman military force. That evidence for such activity has been found within the immediate vicinity of the PDA and locally at West Hawk farm in Ashford suggests this area played a central functional role as part of the aforementioned industries and the projected Roman Road may have been a key transport and trade route.

As such it is unclear why the existing EIA scoping documentation considers the presence of Iron Age and Romano-British period remains to be of low value. The local and regional area were of considerable importance during the transition phase between these periods and whilst past research has largely focused upon centres such as Ashford, Lympne, and Dover research in recent years has identified the existence of a rich cultural rural landscape intimately connected to the former Roman Road network

which played a key role in providing food and raw resources to the urban centres and military structure of the time.

As a whole the archaeological landscape within the PDA is considered of low importance, however it is currently unclear as to how this interpretation was reached and to what extent it complies with the curatorial and academic understanding of the archaeological resource within the local and regional area.

It is the suggestion of the author that the EIA scoping phase collected a complex array of varying evidence. Whilst each element appears to have been considered individually there appears to have been a limited approach to the holistic assessment and interpretation of the data as a whole.

Furthermore interaction with the curatorial authorities appears to have been piecemeal and limited in nature. As a result it is unclear whether the EIA scoping documentation adequately reflects the present understanding of the archaeological landscape and resource at a local and regional level.

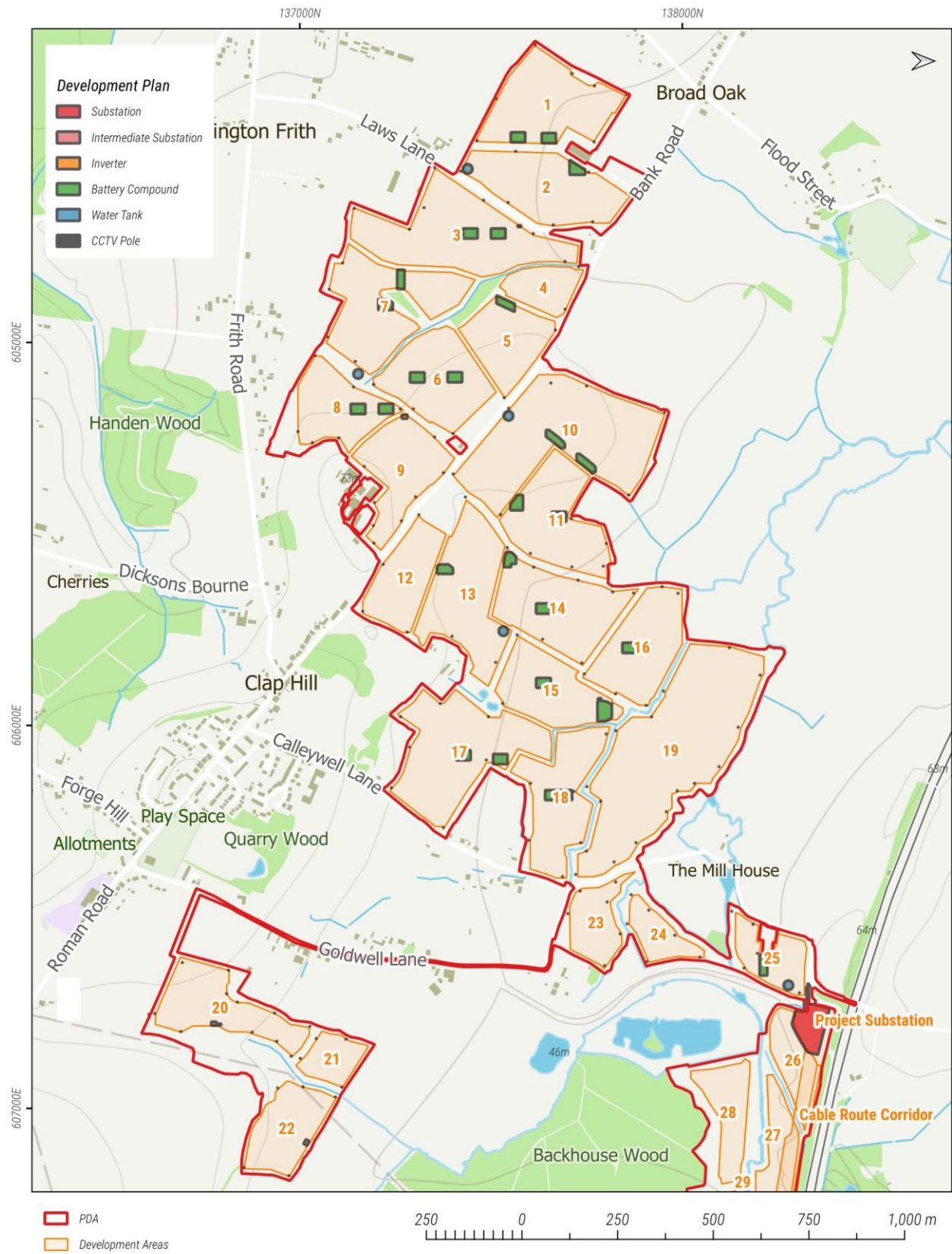


Figure 4: Development Plan (Not including Solar Panels)

4. DISCUSSION OF IMPACT

As part of the EIA scoping phase provisional design documentation pertaining to the operational elements of the Solar Farm has been submitted.

It should be noted that as of writing such documentation contains a number of clauses regarding the physical design of the Solar Farm components with the full extent and nature of several elements remaining unclear.

The following points are of key concern:

1	The location, extent, and impact of enabling works associated with the development are presently unclear. As such impact upon the archaeological resource cannot be estimated.
2	The location, extent, and impact of cabling connecting the functional elements of the Solar Farm to the Project Sub-station is unclear. As such impact upon the archaeological resource cannot be estimated.
3	Detailed design specifications for the cable route corridor appear to be absent as such the impact upon the archaeological resource cannot be estimated.
4	The development has been generally concluded to be of low-impact due to the lack of intrusive development; however, the design documentation outlines a number of intrusive elements (such as the CCTV poles) that do not appear to have been considered.
5	The solar panels are to be mounted on concrete rafts where archaeology is present, however, the design documentation makes no reference to those remains found during the scoping stage and contains no indication as to what percentage of the overall total this may be and where they be located.

Not including the solar panels the current design documentation outlines a further 188 elements required. These affect a total area of 4.1ha (40,884.42m²) they include the following:

Description	Number of Units	Area (m ²)
Battery Compound	26	28751.18
CCTV Pole	150	376.05
Intermediate Substation	3	109.989
Inverter	3	419.446
Project Substation	1	8879.887
Water Tank	5	2347.869

Whilst some of these elements are intended not to have any intrusive impact others are stated to (i.e. the CCTV poles). Of those not intended to have any impact (primarily by being placed on concrete rafts) there is very little information as to how they will be constructed and/or installed. This process will undoubtedly require the use of heavy plant throughout the site and it is currently unclear how any impact for such plant manoeuvres would be mitigated or avoided.

Where panels cannot be mounted upon concrete rafts the design documentation indicates piling up to 3m in depth may be required. It is of note that current evidence indicates a soil column depth of 1-1.5m across the site, as such any piling operation would directly affect the geological layers in which archaeological remains are preserved. As of writing there has been no indication as to what percentage of panels would rafted/piled and where such areas may be located.

It is also of concern that mitigation within the Project Substation – a development that will affect the underlying substrate – consisted of a relatively low number of untargeted trenches whilst within the bounds of the cable-route corridor, again a development that will affect the underlying substrate no evaluation has been undertaken at all despite the existence of a number of relict water courses and possible earthworks.

5. EIA ARCHAEOLOGICAL EVALUATION

As part of the EIA scoping phase of the project 13 evaluation trenches were opened to assess physical evidence of the archaeological resource. These were uniformly 50m in length by 1.8m in width and represented a culminative area of 1.5ha (15,210m²) or a 0.8% sample of the overall project footprint.

These trenches were targeted specifically within the footprint of the proposed project substation (4 trenches) and immediately to the south and north of the projected route of the Roman Road (9 trenches) and do not represent a uniform structured sample of the archaeological potential of the proposed development area as a whole.

As such the value of archaeological evaluation to date is limited and insufficient in sample size to account for the development as a whole. The standard sampling rate for archaeological projects in the UK is approximately 2% of the total development area. In relation to the Stonestreet Green Solar Project this would equate as 426 archaeological evaluation trenches meaning only 3% of the evaluation work has so far been completed:

Area of PDA (m ²)	2% Sample area of PDA	No. of 50x1.8m trenches
1914947.411m ²	38298.948 m ²	426

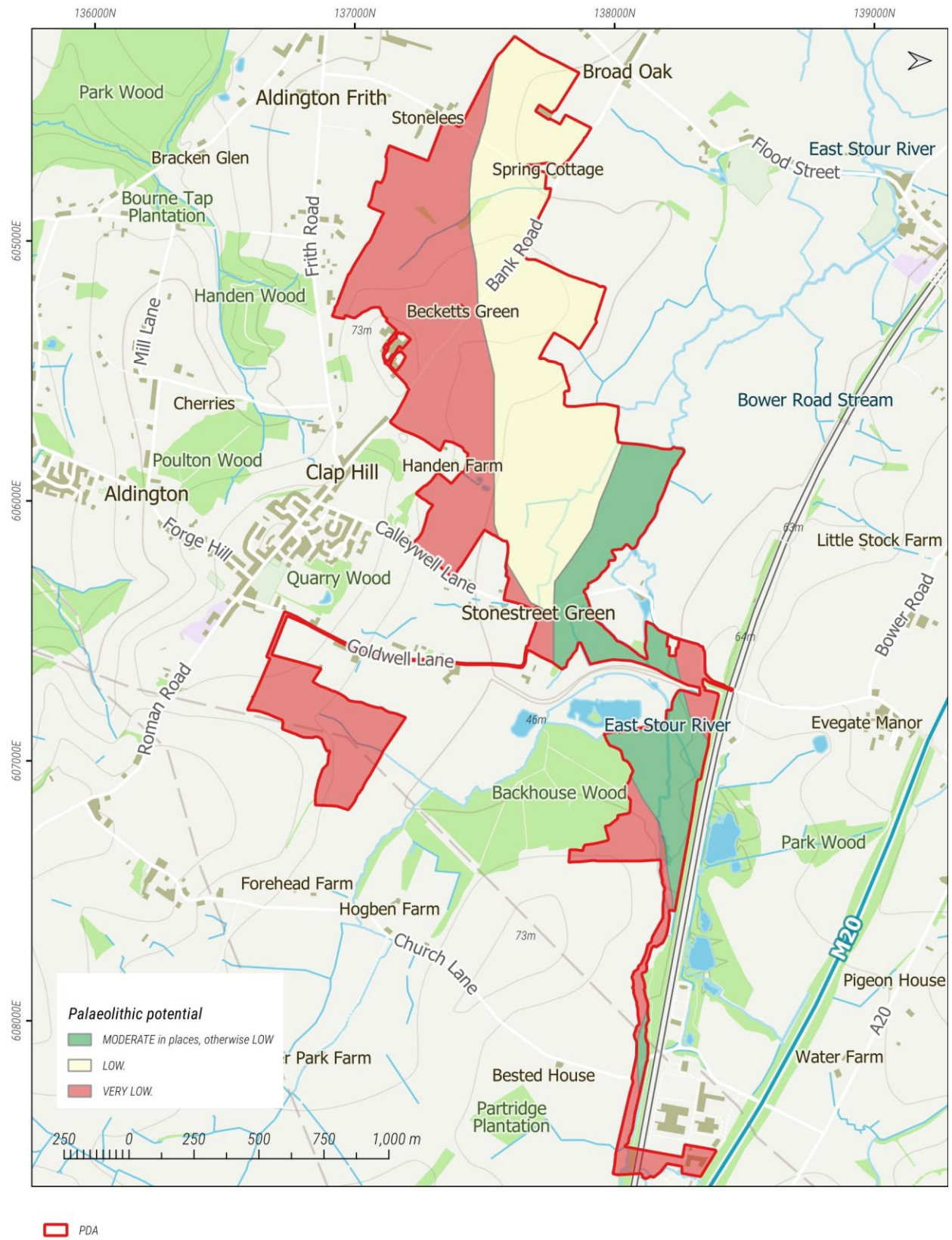


Figure 5: Palaeolithic Potential (Stour Basin Palaeolithic Project)

6. EIA PALAEOENVIRONMENTAL SAMPLING

Whilst a limited number of geoarchaeological test-pits and window samples have been opened as part of the EIA scoping phase it is presently unclear as to the selection methodology that guided placement. Most are situated at the peripheral edges of the PDA and appear to represent neither a random or guided sample methodology.

The results from these have been taken by the EIA documentation to be indicative of palaeoenvironmental potential across the PDA as a whole especially in regards to the presence of Pleistocene sediments and by extension Palaeolithic remains. As with the archaeological evaluation, however, the overall total number of samples appears to be relatively small.

It is worth noting that the potential for such remains has already been assessed through the Stour Basin Palaeolithic Project (KCC 2018). Data from the project identifies that approximately 16.7% of the PDA falls within an area of moderate – low Palaeolithic potential situated within the river basin of the East Stour. A further 37% of land within the PDA is situated within an area of low Palaeolithic potential.

Whilst such potential appears at first to be minimal it is important to remember that any Palaeolithic remains identified are to be considered of high national and regional significance and that the period as a whole is one archaeologist's know very little about. With a number of relict watercourses having been identified in LiDAR and Geophysical survey data and potential having been assessed during the Stour Basin Palaeolithic Project it is the suggestion of the author that this area of assessment should be revisited with a much more robust scheme of sampling in place comprising a mixture of targeted and random sample locations.

7. CONCLUSION

As such it is the opinion of the author that the design documentation at present is of too coarse a resolution to effectively judge short-long term impacts upon the archaeological resource. Areas where piling as opposed to rafting of design elements needs to be clearly identified whilst enabling routes, traffic corridors, and work areas surrounding construction elements need to be defined. Where development will result in intrusive excavation and/or disturbance of the substrate this needs to be clearly outlined in mapping as opposed to just text.

With the publication of the Kent County Councils response to the EIA scoping documentation now published we can see similar concern that a robust evidence base has not been collected to sufficiently inform the proposed archaeological mitigation. In particular the scarcity of ground-truthing means that the proposed archaeological mitigation measures are not evidence-based and potentially do not reflect the archaeological resource within the PDA. Furthermore the lack of sufficiently detailed design documentation is highlighted as being a significant obstacle to the accurate assessment of impact in relation to the archaeological resource.

It is currently impossible to adequately assess the impact of the project in relation to the archaeological resource and historic environment. As such it is unclear whether the suggested mitigation strategy

included within the EIA scoping documents is sufficient or even appropriate to adequately manage risk to the archaeological resource.

8. REFERENCES

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