

Written representation after Open Floor Hearing on 25th Feb 2025 Ashford International Hotel at 5pm

At the Open Hearing I spoke about the very poor state of both the archaeological work across the Stone Street Solar site along with the resultant archaeological report comprising of the geophysical survey along with the desk-based report. Subsequently Aldington and Bonnington Parish Council commissioned Peter Spencer, a nationally recognised LiDAR specialist to review available LiDAR and aerial photography alongside the geophysics and the desk-based report done by Wardell Armstrong. It was notable in his heritage report summing up all the evidence that he had seen that he was struck that Wardell Armstrong had drawn the conclusion that the area is of little archaeological significance. He also noted the paucity of archaeological trenching across the area which at that time had only had a total of 15 trenches and 4 test pits dug to assess the over 400 acres that will be covered by solar panels. He could see no logical reasoning behind the decisions used to place the test pits where they were dug and so wasn't particularly surprised when they turned up little to no archaeology, but did suggest that this was a missed opportunity to learn more about the paleontological history of the area as we know there is some but potentially there is more.

In respect of the very few trenches that were originally dug, I went on to look at the EDF site on Church Lane – a site – that has been refused planning at this point but has gone to appeal. I saw that this particular site is 252 acres and commissioned archaeologists to examine a total of 117 50m x 2m trenches across the entire area, which suggests approx. 1 trench every 2 acres. The Stone Street Green Solar project covers 462 acres and originally only examined 13 trenches most of which were dug at right angles to the Bank road which is the extension of the Roman road running from Lympe and the old Portus Lemanis across to Maidstone in the west meeting up with the Roman road running south from the Eccles area towards Hastings. Port Lemanis and the site of Stutfall Castle was reckoned to be one of the Roman naval bases (Classis Britannica)

As a result of these known notable sites in this small area of East Kent, there were also several Roman Villa sites along with various farmsteads and Roman communities supporting both the Roman settlers as well as the Roman army and naval bases. In and around the historical village of Aldington there is already a known villa site at the east end of the village at Burch's Rough. I personally walked these fields many times in the 80s after the excavation confirming the presence of the buildings to monitor the effects of the ploughing on any remaining archaeological material.

On the Kent HER (historic environment record) there is an interesting crop mark which appears square and on discussion with several archaeologists with many years of experience in Kent, the general feeling is that this could well be another potential villa site.

How is it then that Wardell Armstrong could effectively write this off with just the comment that while it is noted, it is of unknown origin, date etc. Well, I might just say of course it is if you don't bother to even look at it archaeologically by at least putting a trench down to have a look at it!

I was made aware that Evolution Power were 'ordered' to put in more trenches as the sheer paucity of the work they had done was effectively thrown out by KCC. It seems they have been commissioned to do about another 60 trenches in various places across the site. In total that would mean they have now done about 75 trenches in total. Nationally I believe the recommendation for archaeological trenching across a site is 5% of the site area using 50m x 2m trenches. Judging by the amount that Evolution Power have done this is far less than the official recommendation which I believe should be at least 200+ trenches of this size.

When the barrister was asked about this, he said that the trenches were being dug in areas where they thought that archaeological evidence was likely to be found. My feelings about this are that surely this is not the way to sample a site properly particularly as geophysical surveying can be notoriously inaccurate/unreliable and it is not until you actually dig into the ground that you can begin to unpick whether or not people from our historical past lived and worked the land in and around the village of Aldington or anywhere where the landscape is threatened by development of any type which will destroy that evidence both now and for future generations to come.

I feel that to allow the developer to both limit and choose the criteria for the siting of the trenches, albeit with some advice from possibly the KCC archaeological team seems very wrong and suggests a very biased approach to work to disprove anything rather than to actively work to do the best they can not to destroy the largely undiscovered history of this very unique landscape.

When I visited the new trenches being dug along Bank road, behind and alongside Spring Cottages, I was simply shocked by the ground conditions which due to the height of the water table after all the rain, simply meant that firstly the trenches and then any workings into the trenches rapidly filled with water and even the onsite archaeologist stated that it was almost impossible to reasonably assess for any archaeological reporting for the solar factory. HE did suggest though, that certainly in two of the trenches, there was enough material to do further opening up and widening of the trenches to see what was actually going on. I took photos of some of the pottery, Roman Samian ware along with some potentially iron age pottery coming out of ditches, along with areas indicating burning from???. I sent these to an archaeologist as the on site worker suggested that they might have come down the hill in alluvial wash and drift, but the very fact that this material was coming out of identified ditches suggests that these finds are not from alluvial drift but do suggest some kind of settlement activity.

Unfortunately when it came to the barrister, what the onsite archaeologist told me compared to the barrister stating that nothing of note was being found in the new trenches seems to be different and maybe lost in translation or maybe the archaeologists words themselves have been carried away in the alluvial wash from the high water table affecting the trenches. I have today Tuesday 11th March 2025 been to see the archaeologists working on some of the new trenches this week. They have confirmed once again that they are seeing sufficient archaeological evidence in terms of ditches and pits along with pottery coming out of the ditches. In respect of the previous trenches dug around Spring Cottages, they once again reiterated that they were finding enough to warrant widening and expanding the archaeological area as they believed it is likely to be a Roman occupation area of some sort. The field I visited today at the bottom of Calleywell Lane in front of the mill, was once again showing unexpected ditches and pits and could be another area to be targeted for opening up further.

For me, I still question the value of any of the archaeological reporting done by Wardell Armstrong on behalf of Evolution Power. To expect any archaeologist to come up with a fully assessed and reasoned report to inform this solar project seems misjudged and I feel has been done in such a way to purposely not find anything rather than assessing it fully and

then finding ways to work with the things they have found, whatever that may be, is in real danger of reducing the value of archaeologists and the work they do in furthering the understanding of the rich history of this country.

My question now is, how come EDF did so much archaeological evaluation work on the advice of KCC whereas this site has been allowed to get away with so little when arguably the fields involved either side of the roman road have far more potential in terms of archaeology, have had so little investigation done? WHY?????

The very least Evolution Power could do now, is step up to the plate and put things right, do a proper, at least 5% full random trenching of the site giving due consideration to looking at areas of high archaeological possibility and maybe offering the chance of a community partnership to look at the history of the area and maybe a community excavation such as has been done at the Chilmington housing development where there is an ongoing partnership with AOC archaeology group