

# Stonestreet Green Solar

## Cultural Heritage Technical Note

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APFP Regulation Reg 5(2)(q)

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009



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# 1 Introduction

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## 1.1 Background and Purpose

- 1.1.1 EPL 001 Limited (the 'Applicant') submitted an application to the Planning Inspectorate for a Development Consent Order ('DCO') from the Secretary of State for Energy Security and Net Zero for the Project (the 'DCO Application') to deliver the Stonestreet Green Solar Project (the 'Project'). The Project is a Nationally Significant Infrastructure Project ('NSIP') as defined in the Planning Act 2008 (the 'PA 2008'). This EIA Technical Note has been prepared by Quod with input from Wardell Armstrong.
- 1.1.2 The Project comprises the construction, operation, maintenance, and decommissioning of solar photovoltaic ('PV') arrays and energy storage, together with associated infrastructure and an underground cable connection to the existing National Grid Sellindge Substation.
- 1.1.3 A assessment of the likely significant effects of the Project on heritage assets including below ground archaeology was undertaken by Wardell Armstrong (now part of SLR) as part of the Environmental Impact Assessment ('EIA') process as reported in **ES Volume 2, Chapter 7: Cultural Heritage (Doc Ref. 5.2(A))** [[AS-011](#)].
- 1.1.4 Following discussions with Kent County Council ('KCC') during Examination, the Applicant agreed to undertake supplementary archaeological evaluation within the Order Limits (the 'Site') as discussed in the **Signed Statement of Common Ground with Kent County Council (Doc Ref. 8.3.4(E))** This work was completed in 2025 and is reported in the **Supplementary Archaeological Trial Trenching Report (Doc Ref. 8.23)** which is submitted at Deadline 8.
- 1.1.5 This EIA Technical Note provides commentary on the supplementary archaeological information in respect of the baseline information and assessment of likely significant effects of the Project on archaeology as set out in **ES Volume 2, Chapter 7: Cultural Heritage (Doc Ref. 5.2(A))** [[AS-011](#)] and **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref 5.4)** [[APP-070](#)] and [[APP-071](#)].

## 2 Archaeological Evaluation

### 2.1 Introduction

This section provides a brief overview of the baseline archaeological work undertaken to inform **ES Volume 2, Chapter 7: Cultural Heritage (Doc Ref. 5.2(A))** [\[AS-011\]](#) and the scope and findings of supplementary trial trenching evaluation undertaken in 2025.

### 2.2 Baseline Information

#### Submitted Information

- 2.2.1 The baseline archaeological assessment presented in **ES Volume 2, Chapter 7: Cultural Heritage (Doc Ref. 5.2(A))** [\[AS-011\]](#) was informed by:
- A desk based archaeological assessment – presented in **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref 5.4)** [\[APP-070\]](#) and [\[APP-071\]](#));
  - Geophysical surveys – presented in Annex 5 of **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref 5.4)** [\[APP-070\]](#) and [\[APP-071\]](#); and
  - Archaeological trial trenching evaluation – presented in Annex 7 of **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref 5.4)** [\[APP-070\]](#) and [\[APP-071\]](#) provides an Trial Trenching Report detailing an archaeological evaluation undertaken in July 2023 ('2023 Trial Trenching Evaluation').
- 2.2.2 The 2023 Trial Trenching Evaluation comprised 13 trenches and 4 geo-archaeological test pits. The 2023 Trial Trenching Evaluation found some evidence of activity dating to the Bronze Age; some evidence of Roman settlements; and possible evidence of post-medieval agricultural activity. From this evidence, it was concluded the any the sensitivity of any potential archaeology within the Site would be of **low** significance (with the exception of Palaeolithic remains which would be of **low - medium** significance).
- 2.2.3 **ES Volume 2, Chapter 7: Cultural Heritage (Doc Ref. 5.2(A))** [\[AS-011\]](#) considered the sensitivity (value) of archaeological remains against the potential magnitude of impacts of the Project. **ES Volume 2, Chapter 7: Cultural Heritage (Doc Ref. 5.2(A))** [\[AS-011\]](#) concludes that after the implementation of mitigation measures set out in the **Archaeological Management Strategy ('AMS') (Doc Ref.7.17(A))** accordance with which is secured through Requirement 9 in Schedule 2 to the **Draft DCO (Doc Ref. 3.1(G))**, the residual effects of the Project on archaeological remains would be neutral to slight adverse (not significant).



### Supplementary Information

- 2.2.4 Following discussions between the Applicant's representatives and the Senior Archaeological Officer at KCC, supplementary trial trench evaluation was undertaken at the Site between January and April 2025 ('2025 Trial Trenching Evaluation'). The methods and findings of the 2025 Trial Trenching Evaluation are provided in a **Supplementary Archaeological Trial Trenching Report (Doc Ref. 8.23)** submitted at Deadline 8.
- 2.2.5 A Written Scheme of Investigation ('WSI') for the 2025 Trial Trenching Evaluation was submitted to KCC for approval prior to the field work commencing (Annex 1 of the **Supplementary Archaeological Trial Trenching Report (Doc Ref. 8.23)**).
- 2.2.6 The 2025 Trial Trenching Evaluation comprised 62 trial trenches across the Site. The location of the trial trenches were selected based on previous baseline work (including Historic Environment Record ('HER'), LiDAR, aerial photographs and evidence generated from Site-wide geophysical surveys) and advice provided by KCC's Senior Archaeological Advisor. 31 trenches contained features that required investigation and recording. Of those 31 trenches, 11 contained archaeological features dated between Prehistoric to Medieval. The remaining 20 trenches were of Postmedieval to Modern date.
- 2.2.7 The 2023 Trial Trenching Evaluation and 2025 Trial Trenching Evaluation have effectively 'ground-truthed' the results of the LiDAR and geophysical surveys to confirm the level of accuracy of those surveys. Both the 2023 Trial Trenching Evaluation and 2025 Trial Trenching Evaluation largely targeted areas of potential archaeology based on identified geophysical anomalies. Across the 75 trenches undertaken during the two separate phases of evaluation, 15 trenches displayed Prehistoric to Postmedieval archaeological activity; 23 trenches displayed Postmedieval to Modern activity; and the remaining 37 trenches were blank.
- 2.2.8 The results of the 2023 Trial Trenching Evaluation and 2025 Trial Trenching Evaluation show archaeology of local interest at best which is assessed to be not significant. This conclusion is considered consistent with the evaluation of the Site presented in **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref 5.4)** [\[APP-070\]](#) and [\[APP-071\]](#) which identified low to medium value and informed the assessment presented in **ES Volume 2, Chapter 7: Cultural Heritage (Doc Ref. 5.2(A))** [\[AS-011\]](#).

### 2.3 Mitigation Measures

- 2.3.1 The Applicant has prepared an **Archaeological Management Strategy ('AMS') (Doc Ref. 7.17(A))** which sets out the scope, guiding principles and methods for the planning and implementation of further archaeological mitigation works in relation to the Project.
- 2.3.2 Requirement 9 in Schedule 2 to the **Draft DCO (Doc Ref. 3.1(G))** provides that no phase of the Project may commence until the following details for that phase have

been submitted to and approved by the local planning authority, such approval to be in consultation with KCC:

- a written scheme for the investigation of areas of archaeological interest within that phase; and
- identification of any areas where a programme of archaeological investigation is required within that phase and the measures to be taken to protect, record or preserve any significant archaeological remains that may be found.

2.3.3 The details must be generally in accordance with the AMS. The **AMS (Doc Ref. 7.17(A))** has been updated following the 2025 Trial Trenching Evaluation and discussions with KCC and is submitted at Deadline 8.

2.3.4 Following the 2025 Trial Trenching Evaluation, an approach to mitigation has been identified in Fields 2, 9, 10 and 26. This may include preservation in-situ, preservation in record or watching brief. In addition, the post DCO consent archaeological investigation works will include a further programme of 60 trenches across the Site at locations to be agreed with KCC but likely to include the Work No. 2 areas, being the location of Inverter Stations.

2.3.5 An Archaeological Contractor will be commissioned to undertake this work and will submit the detailed WSI to the local planning authority for approval prior to commencement, such approval to be following consultation with KCC pursuant to Requirement 9.

2.3.6 The updated **AMS (Doc Ref. 7.17(A))** does not alter the approach to mitigation set out in **ES Volume 2, Chapter 7: Cultural Heritage (Doc Ref. 5.2(A))** [[AS-011](#)].

### Assessment of Effects

2.3.7 The findings of the 2025 Trial Trenching Evaluation do not result in new or different effects on archaeological remains. The findings further support the assessment presented within **ES Volume 2, Chapter 7: Cultural Heritage (Doc Ref. 5.2(A))** [[AS-011](#)] which concludes that the residual effects of the Project on archaeological remains would be neutral to slight adverse (not significant), following the implementation of the mitigation measures outlined within the **AMS (Doc Ref. 7.17(A))**.

## 3 Conclusion

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- 3.1.1 The Applicant undertook an assessment of effects of the Project on archaeology in the ES, informed by desk-based assessment, geophysical survey and archaeological trial trenching evaluation carried out in 2023. The Applicant undertook further trial trenching in 2025 following discussions with KCC's Senior Archaeological Advisor as reported in the **Supplementary Archaeological Trial Trenching Report (Doc Ref. 8.23)** provided at Deadline 8.
- 3.1.2 The findings of the 2025 Trial Trenching Evaluation further support the baseline assessment of archaeological potential across the Site made by the competent expert (Wardell Armstrong) in **ES Volume 2, Chapter 7: Cultural Heritage (Doc Ref. 5.2(A))** [\[AS-011\]](#).
- 3.1.3 The Applicant has updated the **AMS (Doc Ref. 7.17(A))** to reflect the findings of the 2025 Trial Trenching Evaluation and discussions with KCC although the updated **AMS (Doc Ref. 7.17(A))** does not alter the approach to mitigation set out in **ES Volume 2, Chapter 7: Cultural Heritage (Doc Ref. 5.2(A))** [\[AS-011\]](#).
- 3.1.4 The findings of the 2025 Trial Trenching Evaluation do not identify new or different likely significant effects on archaeological remains and further support the assessment of effects presented within **ES Volume 2, Chapter 7: Cultural Heritage (Doc Ref. 5.2(A))** [\[AS-011\]](#) which concludes that the residual effects of the Project on archaeological remains would be neutral to slight adverse (not significant) following the implementation of the mitigation measures outlined within the **AMS (Doc Ref. 7.17(A))**, as secured through Requirement 9 in Schedule 2 to the **Draft DCO (Doc Ref. 3.1(G))**.