

# Rosefield Solar Farm

## Draft Archaeological Management Strategy

EN010158/APP/7.10  
September 2025  
Rosefield Energyfarm Limited

APFP Regulation 5(2)(q)  
Planning Act 2008  
Infrastructure Planning  
(Applications: Prescribed Forms  
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# 1. Introduction

## 1.1. Purpose of the report

- 1.1.1. This Draft Archaeological Management Strategy has been prepared on behalf of Rosefield Energyfarm Limited ('the Applicant') in relation to the Development Consent Order (DCO) application for the construction, operation and decommissioning of Rosefield Solar Farm (hereafter referred to as the 'Proposed Development').
- 1.1.2. This Draft Archaeological Management Strategy sets out the proposed archaeological management strategy for the Proposed Development, its aims and objectives, as well as the methodologies and standards to be used in undertaking the proposed works. Its purpose is to provide sufficient information for the Senior Archaeological Officer for Buckinghamshire Council to comment on the proposed approach to addressing potential development impacts on archaeological remains during the post-consent phases of the project, as well as to provide information to archaeological contractors to prepare detailed WSIs and tender for any required works.
- 1.1.3. The Draft Archaeological Management Strategy will be updated following a programme of post-DCO evaluation to form the final Archaeological Management Strategy.

## 1.2. The Order Limits

- 1.2.1. The extent of the Order Limits is shown in **Location, Order Limits and Grid Coordinate Plans [EN010158/APP/2.1]** and the Proposed Development is described in full in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and shown spatially on the **Works Plans [EN010158/APP/2.3]**.

## 1.3. The Proposed Development

- 1.3.1. The Proposed Development comprises the construction, operation (including maintenance), and decommissioning of solar photovoltaic ('PV') development and energy storage, together with associated infrastructure and an underground cable connection to the National Grid East Claydon Substation.
- 1.3.2. The Proposed Development would include a generating station with a total exporting capacity exceeding 50 megawatts ('MW').
- 1.3.3. The location of the Proposed Development is shown on **ES Volume 3, Figure 1.1: Location Plan [EN010158/APP/6.3]**. The Proposed

Development would be located within the Order Limits (the land shown on the **Works Plans [EN010158/APP/2.3]** within which the Proposed Development can be carried out). The Order Limits plan is provided as **ES Volume 3, Figure 1.2: Order Limits [EN010158/APP/6.3]**. Land within the Order Limits is known as the 'Site'.

1.3.4. The principal components of the Proposed Development include:

- Solar PV development consisting of:
  - Ground mounted Solar PV generating station. The generating station would include Solar PV modules and mounting structures; and
  - Balance of Solar System (BoSS) which comprises: Inverters; Transformers; Switchgear; Combiner Boxes; acoustic barriers and cabling.
- A project substation (the 'Rosefield Substation') compound comprising: Transformers; Switchgear; reactive power compensation bays; disconnectors; circuit breakers; busbars; control equipment; lightning surge arrestors; building(s) including office, control, functions, material storage, material laydown areas and welfare facilities; firewalls; fencing and acoustic barriers; a security cabin; parking as well as wider monitoring, maintenance and emergency equipment;
- A Main Collector Compound and two Satellite Collector Compounds comprising: Switchgear; Transformers; ancillary equipment; operation and maintenance and welfare facilities; material storage; material laydown areas; fencing and acoustic barriers; and security cabins;
- Battery Energy Storage System (BESS) compound comprising: batteries and associated Inverters; Transformers; Switchgear, ancillary equipment and their containers; office, control and welfare buildings; fencing and acoustic barriers; monitoring, maintenance and emergency systems; air conditioning; electrical cables; fire safety infrastructure; operation (including maintenance) security facilities; material storage; and material laydown areas;
- Interconnecting Cabling Corridor(s) to connect the Solar PV modules and the BESS to the Satellite and Main Collector Compounds to the Rosefield Substation;
- A Grid Connection Cable Corridor to connect the Rosefield Substation to the National Grid East Claydon Substation via 400kV cabling;
- Ancillary infrastructure works comprising: boundary treatment; security equipment; lighting; fencing; landscaping; internal access tracks; works to facilitate vehicular access; earthing devices; earthworks; surface water management; utility connections and diversions; and any other works identified as necessary to enable the Proposed Development;

- Green and blue infrastructure, recreation and amenity works comprising: landscaping; habitat management; biodiversity enhancement; the creation of three permissive footpaths; and works to permanently divert four PRow Footpaths in five instances;
- Site-wide operational monitoring and security equipment; and
- Highways infrastructure improvements and safety works comprising: minor junction improvement works; road widening; passing places; and works to facilitate vehicular access to the Site.

1.3.5. This report is structured as follows:

- Archaeological and Historical Background: a summary of the historic development of the land within the Order Limits, the known and currently unknown archaeological resources within it and its archaeological potential.
- Aims: the high level aims of the proposed archaeological evaluation and mitigation, including how the results of the work could inform the Regional Research agenda.
- Post-DCO Consent Archaeological Evaluation to Inform Detailed Design and Mitigation Measures: a description of the proposal pre-DCO consent archaeological evaluation, including high level methodologies, processes and procedures which should be followed.
- Mitigation Strategies: a description of the proposal post-DCO consent archaeological mitigation, including high level methodologies, processes and procedures which should be followed.

## 1.4. Legislation and planning policy

### National Policy Statements

- 1.4.1. Overarching National Policy Statement for Energy (NPS EN-1) (2023) **[Ref. 1]** – Section 5.9 details the approach to be taken to field evaluation (paragraph 5.9.11) and mitigation (paragraphs 5.9.16-21).
- 1.4.2. National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) (2023) **[Ref. 2]** – Section 2.10 relates to Solar Photovoltaic (PV) generation. Paragraphs 2.10.113-115 details the approach to investigative work and notes that this “*should be proportionate to the sensitivity of, and extent of, proposed ground disturbance in the associated study area*”. Paragraphs 2.10.137 and 2.10.138 confirm the need for a development to retain the ability to microsite infrastructure during the construction phase, “*so that precise locations can be amended during the construction phase if unforeseen circumstances, such as the discovery of previously unknown archaeology, arise*”.

- 1.4.3. National Policy Statement for Electricity Networks Infrastructure (NPS EN-5) (2023) **[Ref. 3]** – paragraphs 2.2.10, 2.9.19 and 2.9.25 confirm the applicant’s responsibility to abide by Schedule 9 of the Electricity Act 1989 (which highlights the desirability of preserving features of archaeological or historic interest), and discusses the requirement for applicants to protect (as far as reasonably practicable) important landscape features such as historic hedgerows.

### National Planning Policy Framework

- 1.4.4. The National Planning Policy Framework (NPPF) **[Ref. 4]** confirms that the historic environment, including archaeological remains, constitutes a material consideration in planning decisions, requiring applicants to describe the significance of heritage assets potentially affected by the development, including any contribution made by their setting.
- 1.4.5. Heritage and conservation forms one of the core planning principles of NPPF:  
*(202) “[Planning should conserve heritage assets] in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.”*
- 1.4.6. This report contributes to meeting the following Policies on the historic environment contained in NPPF (paragraph numbers in bold text).  
*(207) “In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”*
- 1.4.7. The staged approach to assessment that has been taken in relation to archaeology is in accordance with paragraph **(207)** of the NPPF because it presents a proportionate level of detail to determine the application. It also includes a further field evaluation to inform detailed design (as set out in this document) which would be approved by the Senior Archaeological Officer for Buckinghamshire Council.
- 1.4.8. In addition, the NPPF includes the following policy:  
*“(218) Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be*

*lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.*

*(footnote 76) [Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.]”*

### Local planning policy

- 1.4.9. Vale of Aylesbury Local Plan (2013-2033) **[Ref 5]** outlines the following policies in relation to heritage:

#### **BE1 Heritage Assets**

*“[...] Heritage statements and/or archaeological evaluations will be required for any proposals related to or impacting on a heritage asset and/or possible archaeological site.”*

*“[...] There will be a presumption in favour of retaining heritage assets wherever practical, including archaeological remains in situ, unless it can be demonstrated that the harm will be outweighed by the benefits of the development. Heritage statements and/or archaeological evaluations may be required to assess the significance of any heritage assets and the impact on these by the development proposal.”*

## 2. Archaeological and historical background

### 2.1. Background

- 2.1.1. The below summary is taken from the Archaeological Desk-Based Assessment and Setting Assessment of the Proposed Development produced in support of the DCO application (**Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]**).
- 2.1.2. In addition to the Archaeological Desk-Based Assessment and Setting Assessment, the following archaeological investigations have been carried out in support of the Proposed Development:
- Geophysical survey, carried out between September 2023 and February 2025 (**Appendix 9.2: Geophysical Survey Report [EN010158/APP/6.4]**).
  - Archaeological trial trenching, carried out between February and March 2025 (**Appendix 9.3: Archaeological Trial Trenching Report [EN010158/APP/6.4]**).
  - Aerial Investigation and Mapping of the land within the Order Limits (**Appendix 9.4: Aerial Investigation and Mapping Report [EN010158/APP/6.4]**).
- 2.1.3. The results of the above archaeological investigations have been included in the historical narrative (**Section 2.2**) and archaeological background (**Section 2.3**) given below.

### 2.2. Historical narrative of the land within the Order Limits

- 2.2.1. There is no known archaeological evidence for human activity within the Order Limits and minimal evidence for human activity within the study area during the Palaeolithic – Bronze Age periods.
- 2.2.2. There is evidence of Iron Age and/or Roman settlement activity within Parcel 3 of the Order Limits, but no current evidence of such activity elsewhere within the Order Limits.
- 2.2.3. From the early medieval period until the modern period, the land within the Order Limits has formed part of the wooded or agricultural hinterland of one or more of the settlements which surround it. During the post-medieval period, the land within the Order Limits formed part of the Claydon Estate, a Grade II Registered Park and Garden (NHLE 1000597), and a designed avenue of trees ran from the main house into Parcel 2 of the Order Limits.



## 2.3. Known and currently unknown archaeology within the Order Limits

2.3.1. There are no designated heritage assets recorded within the Order Limits, but the Grade II Listed Pond Farmhouse (NHLE1214849) is encircled by Parcel 1.

2.3.2. There are a total of 27 non-designated heritage assets within the Order Limits. These comprise:

- An area of Iron Age to Romano-British settlement activity (HA1/ MBC45205);
- The route of a Roman road (MBC6013/DBC9626);
- Four field systems of Medieval or Post-Medieval date associated with settlements outside the Order Limits, comprised of earthwork and buried ridge and furrow (HA2, HA3, HA4, HA5);
- A field system of Post-Medieval date comprising extant hedgerows (HA6);
- Non-registered parts of parkland associated with Claydon House (MBC20416);
- Three farms dating to the Post-Medieval period (HA7, HA8, HA9);
- The sites of nine other Post-Medieval farm buildings (field barns or outfarms) (HA10, HA11, HA12, HA13, HA14, HA15, HA16, HA17, HA18);
- The route of the Aylesbury to Buckingham branch of the Metropolitan Railway (MBC14921);
- The site of the Granborough Road Station buildings (MBC14922);
- Two Post-Medieval extractive pits (MBC45160 and MBC45161);
- Two former 17<sup>th</sup> century ponds (MBC10753; MBC21469); and
- A WWII ammunition dump (MBC45140).

2.3.3. The locations of these assets are shown in **Figure 1**.

2.3.4. The majority of the known archaeological remains within the Order Limits are of low (local) importance. However, HA1/ MBC45205 and MBC6013/ DBC9626 are of medium (regional) importance due to the rarity of finds of this date across the wider regional area.

2.3.5. **Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]** identifies that there is potential for currently unknown archaeological remains to be present within the Order Limits. This potential is assessed as:

- Early Prehistoric – negligible to low (at depth throughout the Order Limits);
- Iron Age – high (Parcel 3);
- Roman – high (Parcel 3);
- Early Medieval to Medieval – low to medium (Parcels 2 and 3);
- Post-Medieval – high (Parcel 1a); and
- Modern – low (Parcels 1, 2 and 3).

2.3.6. Currently unknown archaeological remains of prehistoric (Palaeolithic – Iron Age) and Romano-British date within the Order Limits are believed most likely to be of medium (regional) importance due to the rarity of finds of this date across the wider regional area. The ES chapter acknowledges that currently unknown archaeological remains of these periods could be of up to very high (international) importance.

2.3.7. Currently unknown archaeological remains of early medieval – modern within the Order Limits are believed most likely to be of low (local) importance. The ES chapter acknowledges that currently unknown archaeological remains of these periods could be of up to very high (international) importance.

## 3. Aims

### 3.1. Overarching aim

- 3.1.1. The overarching aim of this draft Archaeological Management Strategy is to identify a strategy which will:
- minimise the impact of the Proposed Development on the archaeological resource;
  - preserve and record archaeological features.
- 3.1.2. This will be achieved through a programme of post-consent archaeological evaluation and mitigation work. The evaluation will identify appropriate mitigation measures for archaeological recording where impacts cannot be avoided through the detailed design.

### 3.2. Research questions

- 3.2.1. Based on the known archaeological and historic baseline of the Proposed Development and the results of the archaeological investigations undertaken within the Order Limits of the Proposed Development (**Section 2**), it is proposed that future archaeological investigations and mitigation will seek to address the following agenda topics of the Solent-Thames Research Framework for the Historic Environment [**Ref. 6**]:

#### Iron Age

- Agenda item 10.6.1: The extent to which single family pastoral farmsteads existed needs to be determined.
- Agenda item 10.6.2: More remains to be learnt about storage pits, such as the establishment of a minimum size, their reuse as latrines and the implications of this for burials in pits.
- Agenda item 10.6.7: The size of communities in the Iron Age, their social and economic relationships and the degree of economic specialisation need more investigation.

#### Roman

- Agenda item 12.2.1: Sites with well-preserved deposits of both late Iron Age and Roman date should be given careful attention in order to investigate continuity of local tradition at these sites. Sampling strategies should ensure that as wide a range of contexts are sampled as possible. Excavations of deep, well-sealed features are required (as opposed to buildings).

- Agenda item 12.2.2: Radiocarbon dating should be used more widely and systematically to help understand change between the late Iron Age and early Roman period.

### Early medieval

- Agenda item 14.4.5: The use of palaeo-environmental data and enquiry to further the identification of the location and nature of woodland.

### Medieval

- Agenda item 16.4.1: The chronology of development and character of field systems and their relationship to settlement across the region needs to be further explored.
- Agenda item 16.4.2: The character and organisation of ridge and furrow; field drainage.
- Agenda item 16.4.3: The relation of surviving ridge and furrow to early field maps.
- Agenda item 16.4.5: Evidence needs to be gathered for the extension of arable into forests and onto downland; assarts and early enclosure; hedge dates and types.

3.2.2. It will also seek to address any relevant topics in the Archaeological Research Framework for Buckinghamshire [Ref. 7].

## 4. Post-DCO consent archaeological evaluation to inform detailed design and mitigation measures

### 4.1. Post- DCO consent archaeology evaluation

- 4.1.1. Post-DCO consent archaeological evaluation, proposed to be a Requirement of the DCO and undertaken as part of pre-construction works, will consist of the following elements:
- Further non-intrusive investigation to inform targeting of trial trenches; and
  - Targeted archaeological trial trenching.
- 4.1.2. Following the completion of the archaeological evaluation and dependent on the results of that work, further mitigation by design will be considered or a requirement for further archaeological investigation and recording may be identified.
- 4.1.3. Mitigation measures by design could include using non-intrusive foundations, routing of internal cables and access to avoid sensitive archaeological areas, and/or exclusion zones around sensitive archaeological areas.
- 4.1.4. Further archaeological investigation and recording, which may be required, could take the form of archaeological monitoring and recording or a strip, map and sample excavation. The generic methodology for these types of archaeological investigation and recording is provided in **Sections 5.2** and **5.3** below. Detailed WSIs will be prepared, which will address all elements of the required evaluation and any post-determination mitigation.
- 4.1.5. The scope of any further investigation and recording should be appropriate and proportionate to the known or potential importance and significance of the known or currently unknown heritage assets within the Order Limits and the anticipated impacts to these assets, as per National Planning Statement EN-1 [**Ref. 1**] paragraphs 5.9.10, 5.9.11, 5.9.17 and 5.9.19.
- 4.1.6. An outline of the methodology for the non-intrusive survey and archaeological trial trenching is set out below.

### 4.2. Non-intrusive survey

- 4.2.1. Further non-intrusive survey may include geophysical survey (such as electro-magnetic survey (EMI survey)), fieldwalking or metal detecting, within parts of the Order Limits which the magnetometer survey has not been able to identify the archaeological potential.

- 4.2.2. The extent of areas requiring further non-intrusive survey and the method to be used will first be agreed by the Applicant and the Senior Archaeological Officer for Buckinghamshire Council and will then be detailed in a WSI submitted to Buckinghamshire Council for their approval with advice from Historic England.
- 4.2.3. The WSI will conform to relevant guidelines (such as the European Archaeological Council [Ref. 8] and the ClfA's Standard and guidance for archaeological geophysical survey [Ref. 9]). It will:
- Identify the aims and objectives of the archaeological works;
  - Summarise the archaeological and historical background, including the results of the work undertaken to date;
  - Detail the proposed methodologies that will be implemented and form the central basis by which the investigation can be measured;
  - Provide details on the provision of site welfare and equipment, in accordance with archaeological requirements and relevant Health and Safety legislation as appropriate;
  - Include details of a proposed timetable/programme for archaeological works, post-excavation and reporting following completion of works;
  - Detail proposed archiving;
  - Detail the company's Health and Safety Policy, evidence of insurance and a risk assessment for the project; and
  - Detail any external specialists and other third parties to be used in the preparation of the fieldwork reports.
- 4.2.4. Following completion of the fieldwork, a report detailing the results of the non-intrusive survey will be produced. The report will contain all relevant information, including (but not necessarily limited to):
- A non-technical summary of the reason for, aims and main results of the survey;
  - Site code, OASIS Reference, dates of survey, grid references, site location plan and a plan showing the limits of the survey area;
  - An introduction to outline the circumstances leading to the commission of the project and any restrictions to the survey;
  - The aims and objectives of the survey;
  - The methodology used;
  - A summary and synthesis of the archaeological results in relation to the methods used, together with a confidence rating and the perceived importance in the local, regional, or national context. This shall be supported by a survey location plan and other detailed plans as

necessary and appropriate to the type of survey and the survey results tied to the National Grid. Survey locations and all data will be georeferenced and supplied in .dwg or .shp formats together with the survey report so that these can be supplied to the Buckinghamshire Historic Environment Record, if required;

- Conclusion;
- Index to, and location of, the digital archive; and
- References to all primary and secondary sources.

4.2.5. An internally consistent and organised project archive will be produced in accordance with the general archiving methodology detailed in **Section 5.4**.

### 4.3. Targeted archaeological trial trenching

4.3.1. The extent of areas requiring archaeological evaluation will first be agreed by the Applicant and the Senior Archaeological Officer for Buckinghamshire Council following a review of the results of the non-intrusive survey and will then be detailed in a WSI submitted to Buckinghamshire Council for their approval. Historic England's Regional Science Advisor for the South East may also need to be consulted during the preparation of the WSI to confirm appropriate sampling and dating techniques.

4.3.2. Areas likely to require trial trenching include:

- Areas of high archaeological potential identified from the non-intrusive survey (including the pre-submission geophysical survey);
- Ponds;
- Areas of tree planting; and
- Any areas where soil inversion or topsoil stripping is proposed.

4.3.3. The WSI will conform to the ClfA's Standards and Universal Guidance for archaeological evaluation [**Refs. 10 and 11**]. It will:

- Identify the aims and objectives of the archaeological works;
- Summarise the archaeological and historical background, including the results of the work undertaken to date;
- Detail the proposed methodologies and sampling strategies (including for waterlogged and anoxic remains) that will be implemented and form the central basis by which the investigation can be measured;
- Provide details on the provision of site welfare, plant and equipment, in accordance with archaeological requirements and relevant Health and Safety legislation as appropriate;

- Include details of a proposed timetable/programme to archaeological works, post-excavation and reporting following completion of works;
  - Detail proposed archiving;
  - Detail the company's Health and Safety Policy, evidence of insurance and a risk assessment for the project; and
  - Detail any external specialists and other third parties to be used in the preparation of the fieldwork reports.
- 4.3.4. Where archaeological trial trenching is required, the locations of all trenches will be accurately set out, surveyed and excavated and tied to the Ordnance Survey National Grid and Ordnance datum. Topsoil and any other overburden will be stripped from the agreed areas by a suitable plant for mechanical excavation to expose any archaeological remains.
- 4.3.5. All mechanical excavation will be undertaken under the direct and continuous supervision of an experienced archaeologist. Mechanical excavation will cease when the first archaeologically significant horizon is encountered, or when the absence of any such horizon has been adequately demonstrated, to the satisfaction of the Senior Archaeological Officer for Buckinghamshire Council. This will be secured through regular communication with the Senior Archaeological Officer for Buckinghamshire Council, including site monitoring visits if necessary.
- 4.3.6. Following the removal of the topsoil and any other overburden, the area will be inspected for archaeological features, and in all areas containing archaeological remains, particularly those with a significant concentration of features, will be manually cleaned by the Archaeological Contractor.
- 4.3.7. The current outline proposals for the excavation of archaeological remains identified during the archaeological trial trenching are detailed below:
- 100% of discrete features such as hearths, kilns and pits;
  - 100% of funerary features such as graves and cremations;
  - 50% of each discrete features of other types by area;
  - 15% of any linear features which form part of settlement activities or enclosure systems;
  - 10% of each simple linear feature within the whole stripped area; and
  - All terminals of linear features, as well as intersections between features.
- 4.3.8. The exact excavation strategy will be defined and agreed with the Senior Archaeological Officer for Buckinghamshire Council within the WSI.



- 4.3.9. In addition to all stratigraphic relationships, and where appropriate and necessary, sufficient soil samples for dating evidence, the recovery of small finds (e.g. flint microdebitage, fish bones and beads) and ecofactual analysis will be taken.
- 4.3.10. Following completion of the fieldwork, a report detailing the results of the trial trenching will be produced. The report will contain all relevant information, including (but not necessarily limited to):
- Non-technical summary, summarising the scope and results of the investigation;
  - Introduction including site location, background to the project and description of development proposals and planning history;
  - Scope and date of fieldwork, archaeological contractors' personnel, commissioning body;
  - Archaeological and historical background (including geological and topographical background and results of previous phases of fieldwork);
  - Methodology employed;
  - Aims and objectives of the investigation, including research framework questions;
  - Results of the investigation, including feature/group descriptions, finds assessment (if applicable) and environmental assessment (if applicable);
  - Discussion of the results and their significance within the context of the wider landscape;
  - Appendices containing specialist reports (if applicable);
  - Digital appendices of registers and any substantial data resource; and
  - Relevant illustrations
- 4.3.11. An internally consistent and organised project archive will be produced in accordance with the general archiving methodology detailed in **Section 5.4**.

## 5. Mitigation strategies

### 5.1. Mitigation by design

5.1.1. The following strategies for mitigation by design could include, where allowed within the parameters of the Proposed Development:

- Use of non-intrusive foundations for Solar PV modules in areas of sensitive archaeological remains, such as the Iron Age to Romano-British settlement (HA1/MBC45205) and any remains recorded during post-DCO consent archaeological evaluation of High (National) or greater importance);
- Routeing of cables and access tracks to avoid sensitive archaeological remains;
- Micro siting of Inverter Transformer Stations/BESS compounds within development zones; and
- Preservation in situ of assets of very high (international) or high (national) importance identified during the evaluation phase discussed in the previous section.

5.1.2. Such strategies would be defined following completion (including reporting) of the Post-DCO consent archaeological evaluation.

### 5.2. Post-DCO consent mitigation

#### Pre-construction archaeological excavation

5.2.1. The Senior Archaeological Officer for Buckinghamshire Council has confirmed the requirement for pre-construction archaeological excavation within the footprint of the Rosefield Substation and BESS where this includes the area of the Iron Age to Romano-British settlement (see **Section 4**).

5.2.2. The following areas may also be suitable for pre-construction archaeological excavation, depending on the results of post-consent evaluation:

- Areas within solar arrays where evaluation indicates archaeological remains of high sensitivity that cannot be avoided through mitigation by design; and
- Areas within the Interconnecting Cable Corridor where evaluation indicates archaeological remains of high sensitivity that cannot be avoided through mitigation by design.

5.2.3. The extent of areas requiring archaeological excavation will first be agreed by the Applicant and the Senior Archaeological Officer for

Buckinghamshire Council in advance of construction, following a review of the post-consent evaluation results, and will then be detailed in a mitigation WSI submitted to Buckinghamshire Council for their approval. The Historic England's Regional Science Advisor for the South East may also need to be consulted during the preparation of the WSI to confirm appropriate sampling and dating techniques.

- 5.2.4. The WSI will conform to the ClfA's Standards and Universal Guidance of for archaeological excavation [Refs. 12 and 13]. It will:
- Identify the aims and objectives for each element of the archaeological works;
  - Summarise the archaeological and historical background, including the results of the work undertaken to date;
  - Detail the proposed methodologies and sampling strategies (including for waterlogged and anoxic remains) that will be implemented and form the central basis by which the investigation can be measured;
  - Provide details on the provision of site welfare, plant and equipment, in accordance with archaeological requirements and relevant Health and Safety legislation as appropriate;
  - Include details of a proposed timetable/programme for archaeological works, post-excavation and reporting following completion of works;
  - Detail proposed archiving;
  - Detail the company's Health and Safety Policy, evidence of insurance and a risk assessment for the project; and
  - Detail any external specialists and other third parties to be used in the preparation of the fieldwork reports.
- 5.2.5. An outline of the methodology for the archaeological excavation is set out below. It is anticipated that the excavation will take the form of a 'strip, map and sample' excavation.
- 5.2.6. Where strip, map and sample excavation is required, the locations of all areas will be accurately set out, surveyed and excavated and tied to the Ordnance Survey National Grid and Ordnance datum. Topsoil and any other overburden will be stripped from the agreed areas by a suitable plant for mechanical excavation to expose any archaeological remains.
- 5.2.7. All mechanical excavation will be undertaken under the direct and continuous supervision of an experienced archaeologist. Mechanical excavation will cease when the first archaeologically significant horizon is encountered, or when the absence of any such horizon has been adequately demonstrated to the satisfaction of the Applicant and the Senior Archaeological Officer for Buckinghamshire Council.

- 5.2.8. Following the removal of the topsoil and any other overburden, the area will be inspected for archaeological features, and in all areas containing archaeological remains, particularly those with a significant concentration of features, will be manually cleaned by the Archaeological Contractor.
- 5.2.9. The requirement to metal detect the spoil heaps and excavated areas, as well as the collection of unstratified artefacts or small finds exposed during manual cleaning, will be reviewed and agreed in advance with the Senior Archaeological Officer for Buckinghamshire Council.
- 5.2.10. The current outline proposals for excavation of archaeological remains encountered during strip, map and sample excavation are detailed below:
- 100% of discrete features such as hearths, kilns and pits;
  - 100% of funerary features such as graves and cremations;
  - 50% of each discrete features of other types by area;
  - 15% of any linear features which form part of settlement activities or enclosure systems;
  - 10% of each simple linear feature within the whole stripped area; and
  - All terminals of linear features, as well as intersections between features.
- 5.2.11. The exact excavation strategy will be defined and agreed with the Senior Archaeological Officer for Buckinghamshire Council within the WSI.
- 5.2.12. In addition to all stratigraphic relationships, and where appropriate and necessary, sufficient soil samples for dating evidence, the recovery of small finds (e.g. flint microdebitage, fish bones and beads) and ecofactual analysis will be taken.
- 5.2.13. Following completion of the fieldwork, a report detailing the results of the strip, map, and sample excavation will be produced. The report will contain all relevant information, including (but not necessarily limited to):
- Non-technical summary, summarising the scope and results of the investigation;
  - Introduction including site location, background to the project and description of development proposals and planning history;
  - Scope and date of fieldwork, archaeological contractors' personnel, commissioning body;
  - Archaeological and historical background (including geological and topographical background and results of previous phases of fieldwork);
  - Methodology employed;

- Aims and objectives of the investigation, including research framework questions;
- Results of the investigation, including feature/group descriptions, finds assessment (if applicable) and environmental assessment (if applicable);
- Discussion of the results and their significance within the context of the wider landscape;
- Appendices containing specialist reports (if applicable);
- Digital appendices of registers and any substantial data resource; and
- Relevant illustrations

5.2.14. An internally consistent and organised project archive will be produced in accordance with the general archiving methodology detailed in **Section 5.4**.

### 5.3. Archaeological monitoring and recording

5.3.1. Archaeological monitoring and recording is proposed within the footprints of the Main and Satellite Collector Compounds, BESS (if this is not constructed within the footprint of the Iron Age to Romano-British settlement), BoSS, ITS and any underground cable runs where archaeological remains would not require preservation in situ and are not avoided through detailed design, including:

- Area of linear anomalies north of Sheephouse Wood (MBC44779) (non-designated heritage asset);
- Route of Roman road (MBC6013) (non-designated heritage asset);
- Below ground remains of farms and farm buildings of post-medieval date (HA7, HA8, HA9, HA10, HA11, HA12, HA13, HA14, HA15, HA16, HA17, HA18) (non-designated heritage assets);
- Route of Aylesbury to Buckingham branch of the Metropolitan Railway (MBC14921) and site of Granborough Road Station buildings (MBC14922) (non-designated heritage assets);
- Two post-medieval extractive pits (MBC45160 and MBC45161) (non-designated heritage assets); and
- Two former 17th century ponds (MBC10753; MBC21469) (non-designated heritage asset)).

5.3.2. The extent of areas requiring archaeological monitoring and recording will first be agreed by the Applicant and the Senior Archaeological Officer for Buckinghamshire Council in advance of construction, following a review of the post-consent evaluation results, and will then be detailed in a mitigation WSI submitted to Buckinghamshire Council for their approval.

The Historic England's Regional Science Advisor for the South East will be consulted during the preparation of the WSI to confirm appropriate sampling and dating techniques.

- 5.3.3. The WSI will conform to the ClfA's Standards and Universal Guidance for archaeological monitoring and recording of ClfA [Refs. 14 and 15]. It will:
- Identify the aims and objectives for each element of the archaeological works;
  - Summarise the archaeological and historical background, including the results of the work undertaken to date;
  - Detail the proposed methodologies and sampling strategies (including for waterlogged and anoxic remains) that will be implemented and form the central basis by which the investigation can be measured;
  - Provide details on the provision of site welfare, plant and equipment, in accordance with archaeological requirements and relevant Health and Safety legislation as appropriate;
  - Include details of a proposed timetable/programme for archaeological works, post-excavation and reporting following completion of works;
  - Detail proposed archiving;
  - Detail the company's Health and Safety Policy, evidence of insurance and a risk assessment for the project; and
  - Detail any external specialists and other third parties to be used in the preparation of the fieldwork reports.
- 5.3.4. The Applicant or their Principal Contractor arrange for site attendance by suitably qualified archaeological personnel and will facilitate access for the site archaeologist(s) to observe the groundwork activities being undertaken.
- 5.3.5. During the archaeological monitoring and recording the attending archaeologist(s) will observe the excavation of topsoil/overburden until the first archaeological horizon, formation depth or the upper surface of the natural geology is exposed, whichever is first.
- 5.3.6. The archaeologist(s) will require that excavation works pause in order to allow the inspection of any exposed deposits of archaeological potential. Adequate time will be afforded to the archaeologist to characterise any archaeological remains present before groundworks continue in that area.
- 5.3.7. If archaeological remains are identified, all groundworks in the vicinity will cease once the remains have been fully exposed to allow for sufficient recording.

- 5.3.8. If significant finds/features of any date are identified during the archaeological monitoring and recording, a suitable programme of mitigation would be agreed with the Senior Archaeological Officer for Buckinghamshire.
- 5.3.9. Following completion of the fieldwork, a report detailing the results of the archaeological monitoring and reporting will be produced. The report will contain all relevant information including (but not necessarily limited to):
- Non-technical summary, summarising the scope and results of the investigation;
  - Introduction including site location, background to the project and description of development proposals and planning history;
  - Scope and date of fieldwork, archaeological contractors' personnel, commissioning body;
  - Archaeological and historical background (including geological and topographical background and results of previous phases of fieldwork);
  - Methodology employed;
  - Aims and objectives of the investigation, including research framework questions;
  - Results of the investigation including feature / group descriptions, finds assessment (if applicable) and environmental assessment (if applicable);
  - Discussion of the results and their significance within the context of the wider landscape;
  - Appendices containing specialist reports (if applicable);
  - Digital appendices of registers and any substantial data resource; and
  - Relevant illustrations
- 5.3.10. An internally consistent and organised project archive will be produced in accordance with the general archiving methodology detailed in **Section 5.4**.

## 5.4. General mitigation methodologies

- 5.4.1. The following methodologies will be applicable to all forms of archaeological investigation and recording carried out as part of post-DCO consent mitigation and will be agreed upon and reflected in any mitigation WSI(s) submitted.



## Programme

- 5.4.2. Each WSI must be agreed upon and approved by the Applicant, Senior Archaeological Officer for Buckinghamshire Council and the Archaeological Contractor prior to the commencement of archaeological works. Each WSI will include a programme which will detail the proposed start and end dates for onsite works, as well as the proposed duration per mitigation area. The programme will also account for any post-excavation assessment and reporting, as required to discharge any archaeological requirements of the DCO.

## Roles and responsibilities

- 5.4.3. The Applicant or their Principal Contractor will:

- Provide all necessary welfare, site security, site inductions, plant, and attendances relevant to each stage of the archaeological works;
- Allow unhindered access into the areas of the Order Limits to be archaeologically investigated to the Archaeological Contractor; and
- Provide access to the Senior Archaeological Officer for Buckinghamshire Council to the land within the Order Limits being archaeologically investigated for oversight purposes during each stage of the works.

- 5.4.4. The Archaeological Contractor will:

- Produce a WSI for each stage of fieldwork for which they are appointed and ensure the approval of this WSI by the Senior Archaeological Officer for Buckinghamshire Council as described in this Archaeological Mitigation Strategy;
- Produce a Risk Assessment and Method Statement (RAMS) for each stage of fieldwork for which they are appointed;
- Inform the Senior Archaeological Officer for Buckinghamshire Council of commencement of each stage of the archaeological work prior to site works for that stage beginning;
- Provide suitably qualified and experienced personnel to undertake the archaeological investigations;
- Undertake the reporting and archiving stages of work as described in this Archaeological Mitigation Strategy.



## Health and safety

- 5.4.5. All work will be carried out in accordance with the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety Regulations 1992, and all other relevant Health and Safety legislation, regulations and codes of practice in force at the time for the fieldwork.
- 5.4.6. Prior to commencement, a Risk Assessment and Method Statement (RAMS) for the work will be prepared and submitted to the Applicant for review and acceptance. A copy can be issued to Buckinghamshire Council if required.
- 5.4.7. PPE requirements will be subject to review by the Applicant; however, these will be in line with Health & Safety requirements and will be confirmed following the appointment of an Archaeological Contractor.

## Access and setting out

- 5.4.8. The appointed Archaeological Contractor will be permitted access to the land within the Order Limits being archaeologically investigated, following identification of relevant hazards, restrictions, permits and relevant qualifications. Access will be arranged by the Applicant in advance of all site works.
- 5.4.9. The location of each area subject to excavation will be accurately set out, and in those areas where monitoring has identified an archaeological resource, surveyed and tied into the Ordnance Survey National Grid and Ordnance datum.

## Machine and hand excavation

- 5.4.10. Machine excavation will be under the instruction of a sufficiently experienced and qualified archaeologist, with mechanical excavators equipped with a toothless ditching bucket and under constant archaeological supervision.
- 5.4.11. The archaeological features and deposits encountered will be excavated by hand, and hand cleaning will also replace mechanical excavation in all instances where very sensitive features or finds are encountered to prevent unnecessary damage.
- 5.4.12. Exposed archaeology must be investigated sufficiently to establish its nature, extent and date, unless deemed to be of sufficient importance to require preservation in-situ, in which case the Applicant and the Senior Archaeological Officer for Buckinghamshire Council should be contacted to discuss any additional measures. Sampling of archaeological features will be dependent on feature type but will be sufficient to enable a basic understanding of the feature.

- 5.4.13. The depth and complexity of archaeological features and deposits within each area exposed will be ascertained, unless HS&E constraints deem otherwise. Where features cannot be hand excavated, the Applicant and the Senior Archaeological Officer for Buckinghamshire Council will be consulted.

#### Recording and sampling

- 5.4.14. All excavated archaeological contexts will be recorded in full through provision of detailed written context records, which will include details of extent, location, relationships, samples, finds, and cross-references to any relevant contexts.
- 5.4.15. All features will be planned at an appropriate scale, either digitally or by hand, as well as feature cross sections, and photographed accordingly. These plans and the photographic record will be presented in any final reporting.
- 5.4.16. In addition, all finds and environmental samples (including waterlogged and anoxic remains) will be retained and recorded in order to provide dates and assist in the interpretation of form and function of any archaeological features or deposits identified.
- 5.4.17. All finds and samples will be collected and treated in accordance with the relevant guidance, including:
- ClfA's Guidance for the collection, documentation, conservation and research of archaeological materials [Ref. 16]
  - Museums and Galleries Commission's Standards in the Museum Care of Archaeological Collections [Ref. 17]; and
  - Environmental Archaeology: a guide to theory and practice of methods, from sampling and recovery to post-excavation [Ref. 18]

#### Human remains

- 5.4.18. Any discovered human remains should in the first instance be left in-situ, covered and protected. The Applicant should be informed immediately of such a discovery. The Applicant will inform Buckinghamshire Council and the local Coroner.
- 5.4.19. If human remains are discovered during the archaeological works, authority to excavate the human remains for archaeological purposes or to examine them in the ground will be obtained, in accordance with the requirements of the Ministry of Justice [Ref 7-10-19].

## Treasure

- 5.4.20. In the event of discovery of artefacts covered or potentially covered by Treasure Act 1996, these will be removed and reported to the Applicant who will inform the local Coroner according to the procedures relating to the Treasure Act of 1996, Buckinghamshire Council and the Finds Liaison Officer.

## Post-excavation analysis and reporting

- 5.4.21. As requested by the Senior Archaeological Officer for Buckinghamshire, the post-excavation and reporting of each stage of fieldwork (geophysical survey, targeted trial trenching, archaeological excavation and archaeological monitoring and recording) must take account of the results of any archaeological investigations carried out at Tuckey Solar Farm and the National Grid substation or any other developments within the footprint of the Iron Age to Romano-British settlement.
- 5.4.22. Post-excavation analysis and reporting will be undertaken in accordance with the requirements of the ClfA's standards and guidance [**Ref. 9 – 16** and **Ref. 20**].
- 5.4.23. As detailed in **Sections 5.2** and **5.3**, each stage of fieldwork will generate a separate report. Upon completion of all required fieldwork, the Senior Archaeological Officer for Buckinghamshire Council will be consulted to confirm any requirement for publication (as a journal article or monograph) of the results.
- 5.4.24. Draft reports will be submitted in the first instance for review/comment to the Applicant and the Senior Archaeological Officer for Buckinghamshire Council and any other Specialists (e.g., Historic England) as required. In finalising the reports, the Archaeological Contractor will take into account any comments made and remedy any faults identified prior to the finalised report being submitted for condition discharge.

## Archive preparation and deposition

- 5.4.25. As outlined in **Sections 5.2** and **5.3**, the project archive for each stage of fieldwork should be collated and prepared for deposition at the end of that stage of fieldwork.
- 5.4.26. If agreed with the Senior Archaeological Officer for Buckinghamshire Council, Buckinghamshire Historic Environment Record and the collecting repository, the full project archive, including all stages of fieldwork, will be deposited upon completion of all fieldwork as a single project archive. The final agreed arrangements for deposition of the project archive will be laid out in the WSI for each stage of fieldwork.

- 5.4.27. Adequate resources will be provided during fieldwork to ensure that records adhere to the ClfA's Standard and guidance for the creation, compilation, transfer and deposition of archaeological archives [Ref. 20] and any guidance issued by the collecting repository.
- 5.4.28. Immediately upon completion of the finalised report, the report and any data or other documentation produced during the post-excavation assessment process will be integrated into the site archive.
- 5.4.29. The results will be uploaded onto the online OASIS form at <http://oasis.ac.uk/> and once the reporting is in the public domain by submission to the Buckinghamshire Historic Environment Record and Historic England National Record of the Historic Environment (NRHE). Buckinghamshire Council will validate the appropriate OASIS form.

## 6. References

- Ref. 1** Overarching National Policy Statement for Energy (NPS EN-1) (2023) (Online). Available at <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1> (Accessed 15/07/2025)
- Ref. 2** National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) (2023) (Online). Available at <https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3> (Accessed 15/07/2025)
- Ref. 3** National Policy Statement for Electricity Networks Infrastructure (NPS EN-5) (2023) (Online). Available at <https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5> (Accessed 15/07/2025)
- Ref. 4** Ministry of Housing, Communities & Local Government December 2024 *National Planning Policy Framework* (Online). Available at <https://assets.publishing.service.gov.uk/media/675abd214cbda57cadd3476e/NPPF-December-2024.pdf> viewed 01/05/2025 (Accessed 15/07/2025)
- Ref. 5** Vale of Aylesbury Local Plan (2013-2033) (Online). Available at [https://media.buckinghamshire.gov.uk/documents/Aylesbury\\_local\\_plan\\_L46JWaT.pdf](https://media.buckinghamshire.gov.uk/documents/Aylesbury_local_plan_L46JWaT.pdf) (Accessed 15/07/2025)
- Ref. 6** Hey, G. and Hind, J. (eds.) (2014) Solent-Thames Research Framework for the Historic Environment Resource Assessments and Research Agendas. Oxford Wessex Archaeology Monograph 6
- Ref. 7** Bucks Archaeological Society (2009) An Archaeological Research Framework for Buckinghamshire. Bucks Papers No. 15
- Ref. 8** Europae Archaeologia Consilium (2016) EAC Guidelines for the Use of Geophysics in Archaeology (Belgium)
- Ref. 9** Chartered Institute for Archaeologists (CIfA) (2014) (updated 2020) (Online) Standard and guidance for archaeological geophysical survey (Reading) <https://www.archaeologists.net/sites/default/files/2023-11/CIfA-SandG-Geophysical-Survey-2020.pdf> (Accessed 15/07/2025)
- Ref. 10** Chartered Institute for Archaeologists (CIfA) (2023a) (Online) Standard for archaeological field evaluation (Reading) <https://www.archaeologists.net/sites/default/files/Standard%20for%20archaeological%20field%20evaluation.pdf> (Accessed 15/07/2025)
- Ref. 11** Chartered Institute for Archaeologists (CIfA) (2023b) (Online) Universal guidance for archaeological field evaluation (Reading) <https://www.archaeologists.net/sites/default/files/Universal%20guidance%20for%20archaeological%20field%20evaluation.pdf> (Accessed 15/07/2025)

- Ref. 12** Chartered Institute for Archaeologists (CIfA) (2023c) (Online) Standard for archaeological excavation (Reading)  
<https://www.archaeologists.net/sites/default/files/Standard%20for%20archaeological%20excavation.pdf> (Accessed 15/07/2025)
- Ref. 13** Chartered Institute for Archaeologists (CIfA) (2023d) (Online) Universal guidance for archaeological excavation (Reading)  
<https://www.archaeologists.net/sites/default/files/Universal%20guidance%20for%20archaeological%20excavation.pdf> (Accessed 15/07/2025)
- Ref. 14** Chartered Institute for Archaeologists (CIfA) (2023e) (Online) Standard for archaeological monitoring and recording.  
<https://www.archaeologists.net/sites/default/files/Standard%20for%20archaeological%20monitoring%20%26%20recording.pdf> (Accessed 15/07/2025)
- Ref. 15** Chartered Institute for Archaeologists (CIfA) (2023f) (Online) Universal guidance for archaeological monitoring and recording.  
<https://www.archaeologists.net/sites/default/files/Universal%20guidance%20for%20archaeological%20monitoring%20%26%20recording.pdf> (Accessed 15/07/2025)
- Ref. 16** Chartered Institute for Archaeologists (2014) (Online) Standard and Guidance for the Collection, Documentation, Conservation and Research of Archaeological Materials.  
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- Ref. 17** Museums & Galleries Commission (1992) (Online) Standards in the Museum Care of Archaeological Collections  
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- Ref. 18** Historic England 2011 Environmental Archaeology: A Guide to the Theory and Practice of Methods, from Sampling and Recovery to Post-excavation (second edition)
- Ref. 19** Ministry of Justice 2013 Apply to excavate human remains for archaeological purposes  
<https://www.gov.uk/government/publications/apply-to-excavate-human-remains-for-archaeological-purposes> (Accessed 06/08/2025)
- Ref. 20** Chartered Institute for Archaeologists (CIfA) (2014) (updated 2020) (Online) Standard and guidance for for the creation, compilation, transfer and deposition of archaeological archives (Reading)  
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