



Alex Stafford
Case Officer
Planning and Development Unit
Ashford Borough Council
Civic Centre
Tannery Lane
Ashford
Kent
TN23 1PL

**Heritage
Environment, & Waste GT**
Invicta House
County Hall
MAIDSTONE
ME14 1XX

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SENT BY EMAIL

Re: 22/00668/AS - Land south of M20 Church Lane Aldington

Thank you for your letter consulting us on the above planning application for a solar farm and associated works.

This application is supported by an Environmental Statement which includes assessment of heritage. I note the HEDBA and geophysical survey reports as appendices to Chapter 12. These reports are welcome but I do have concerns still. One concern is regarding the simplicity of the HEDBA, particularly the lack of in-depth analysis and interpretation of archaeological potential. Another concern relates to the proposed location of solar panels on Bested Hill, both visual impact and on potential significant archaeology. I consider further archaeological assessment is needed prior to determination, to ensure informed decisions are made.

The proposed solar farm is located within the valley of the River Stour with tributaries extending through the development site. Alluvial deposits survive within the site and these have potential for Early Prehistoric remains. Formal investigations for major schemes such as the M20 and HS1 have revealed a variety of prehistoric, Roman and Medieval remains but the proposed development site itself does not have many HER sites due to its rural and undeveloped nature. As such there is potential for as yet unknown significant multi-period archaeology to survive on the site.

I note the submission of the geophysical survey and welcome the preliminary works. The geophysical survey does seem to have highlighted the presence of archaeology, possible of a ritual nature with ring ditch, but this technique does not always reveal the full extent of buried archaeology nor its date and character or significance. Verification of geophysical survey results is usually needed, often through targeted trial trenching. Geophysical anomalies are not necessarily sufficient evidence to base mitigation on and I encourage ground truthing assessment to ensure understanding of heritage issues is robust.

In addition to the geophysical report, the application is supported by broad heritage assessment but I suggest the assessment is not as thorough as it should be for a scheme as large scale as this one. I do have some concerns over the HEDBA by Orion. The report provides description of known archaeology but not sufficient analysis and interpretation. I do not agree with paragraph 1.4 which states the assessment allows an understanding of significance of remains on site. I consider we do not yet understand the character or significance of archaeological resource across the site, including dating, character, extent, etc.

The HEDBA does not place the archaeological sites in their landscape context. This application site rests within a river valley with a highly visible hill, Bested Hill. To the south is the alignment of the one of the major Roman roads through Kent, located on the ridge supposedly. Analysis of such terrain would be enormously helpful in understanding the potential for early prehistoric remains, Later prehistoric and Roman activity on site as well as the nature of the adjacent ring ditches suggested by the geophysical survey. Prehistoric potential can be informed by assessment of geology and topography but there is no detailed assessment of the geology or topography and, contrary to paragraph 1.10, I believe there are "superficial" deposits within the application site, with Alluvium running North to South.

Although I do welcome the heritage assessment, I consider there needs to be more thorough analysis of the known archaeological data to inform potential within the site, and thereby ensure mitigation is sufficiently evidence-based. I also consider there needs to be an archaeological landscape assessment given the extent and visible nature of the proposed solar farm, especially on top of Bested Hill.

I recommend that prior to determination of this application, there needs to be:

- Greater analysis and interpretation of archaeological data
- Archaeological fieldwork, including ground-truthing the geophysical survey results
- Archaeological landscape assessment

I hope these comments are helpful.

Yours sincerely

Wendy Rogers
Senior Archaeological Officer
Heritage Conservation