

Representation Regarding Asset 4081 — Roman Villa & Hunting Lodge Complex, Fordham

1. Significance and Valuation of Asset 4081

In my view, Asset 4081 — the Roman hunting lodge at Fordham — has been significantly undervalued by National Grid. The designation of a *medium* value fails to reflect the true archaeological importance of this site. Of particular note is the discovery of an indoor fountain (*piscina*), which NG has not mentioned at all in its assessment. This feature is of exceptional rarity: only two such fountains have been found in the UK, and only a handful exist across the rest of Europe.

Further significant finds include Roman and Saxon burial grounds. Rural Roman burial grounds are rare; those of high status, evidenced by lead-lined coffins, are rarer still. A third Roman burial remains in situ, with further burials likely. NG has also failed to mention a complete child Saxon burial, nor the subsequent discovery of remains of at least four other individuals.

In addition to the bathhouse and hunting lodge, (a substantial quantity of deer bones have been recovered, some bearing arrow damage), the site encompasses Roman and Saxon burial grounds of considerable importance. One find from this site was featured in *Britannia*, published by the Roman Society — a major academic publication.

The site is almost certainly connected to three other Roman sites located approximately half a mile away in Fossetts Lane. NG's proposals would pass through those sites as well.

2. Inadequacy of Mitigation Assessment

I strongly dispute NG's assessment that the post-mitigation impact is only '*low adverse*' and '*minor*'. NG's own documentation acknowledges that a portion of the asset would be destroyed entirely, and that the setting would be irrevocably harmed by the proximity of the proposed pylons.

Destruction cannot be mitigated. The current setting of the site commands views towards Roman Colchester on the hill — the likely origin point of visitors to the complex in antiquity. A 50-metre-high pylon in this setting would cause permanent and irreversible harm to that historical landscape. This is not a matter capable of mitigation, and it is inappropriate to characterise the residual harm as minor.

Pylon TB047, specifically, would be positioned directly above known Roman archaeology situated beneath our southern dig site fence and extending approximately 30 metres beyond it. This area was planned as Phase 4 of the excavation; the dig is currently in Phase 3.

I draw the Inspector's attention to the following passage from the Secretary of State's decision letter for the Five Estuaries offshore wind farm, dated 17 December 2025:

“The Secretary of State considers preservation by record does not amount to mitigation of harm for archaeological remains...”

This principle applies directly here. NG's proposed approach of surveys, trial trenching, removal of finds, and demolition of any structural remains (walls, floors

and the like) constitutes destruction by record, not mitigation. It would permanently deny the local community, future researchers, and future generations of archaeologists — amateur and professional alike — the opportunity to study these remains in situ.

3. Factual Inaccuracies in NG's Evidence

NG's documentation contains material factual errors that undermine the reliability of its assessment:

- NG states that the dig ran until 2021 and has concluded. This is incorrect. The excavation is still active and is expected to continue for several years to come.
- The geophysical surveys were conducted in 2013 and 2014. NG's characterisation of the timeline is therefore also inaccurate in this respect.
- NG makes no mention of the indoor fountain (piscina), the child Saxon burial, the additional Saxon burials, or the high-status Roman burials in lead-lined coffins.

4. Community and Educational Value

NG's assessment entirely disregards the profound community and educational value of this ongoing excavation. The impact of the scheme will fall not only upon archaeology in the ground, but upon the community that has been working on this site since 2015 — a community that, in my submission, should be allowed to continue.

Participants in the excavation have included:

- Students from across Europe;
- A professor of archaeology from Argentina, who returns as a regular participant;
- A family from Australia;
- Approximately 30 regular volunteers from Essex and Suffolk;
- Children from the Colchester branch of The Young Archaeologists Club, who visit and participate in the dig — a genuinely rare opportunity for under-16s to engage with live archaeological fieldwork.

This is not merely an asset to be assessed in isolation. It is an active, living archaeological project with local, national, and international reach.

5. Additional medieval site

Amongst the three other Roman sites (between pylons TB043 & TB044) in Fossetts lane there is a medieval site.

This been on the HER for a long time and is listed as a probable moated site. It is sited right next to the pylon TB043, so is under threat.

Geophysics and other research suggest it dates from at least 1250 (dated coin found), and pottery finds suggest it existed until the late 16th, maybe early 17th century.

Because of the dateable finds and its position in the parish, this is highly likely to be the lost Norman manor hall of Great Fordham (aka Fordham Magna).

The sites of the three other manors are known as later halls and still exist, while the location of the Great Fordham manor was "lost to memory" even in the 18th century.

6. Conclusion

The whole of this area is of local and national importance. Asset 4081 has been systematically under-assessed by NG. The rare finds, the ongoing community excavation, the burial grounds, and the irreplaceable setting all demand a higher significance rating and a genuine re-examination of the proposed route in this area.

I also note, with regret, that I have raised these matters with National Grid over a period of three years without any meaningful engagement with the substance of my concerns. I ask the Inspector to give proper weight to this representation.