



Historic England

Our ref: ADMO5939

Heathrow Airport Limited
Compass Centre
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By email: expansion.feedback@heathrowconsultation.com

28 March 2018

Dear Sir/Madam

1. Heathrow Airport Expansion Consultation

- 1.1 Thank you for the opportunity to comment on the initial consultation on the options and proposals to expand the existing airport and build a new north-west runway. As the Government's statutory adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages of the planning process. Given the likely environmental impacts of any expansion project at Heathrow airport, we are particularly keen that these are properly understood so that they can be considered as part of the decision-making process. Our comments are therefore related to these impacts.
- 1.2 Historic England has been clear throughout our engagement and discussions on the potential expansion of Heathrow Airport that a new northwest runway is the most damaging in terms of the historic environment. Based upon available information, this option is likely to mean the loss of 21 designated heritage assets as a result of the land required for the new runway, including the unprecedented total loss of the Longford village conservation area and a substantial part of the Harmondsworth conservation area.
- 1.3 Around a further 220 designated heritage assets will experience effects upon their setting, with the Grade I listed Great Barn and the Grade II* listed St Mary's Church in Harmondsworth likely to be particularly affected due to the proximity of the new northern boundary of the airport and through significantly increased noise effects in the area.
- 1.4 The wider Heathrow area is also well known for its extensive and highly significant multi-period archaeological landscapes. All harm to the historic environment as a result of any new runway and associated development must be minimised, and where it cannot be avoided must be robustly justified.



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1.5 Historic England has commented in detail previously on the drafts of the Airports National Policy Statement (ANPS) and has indicated our support for the approach set out in within it, subject to some issues being addressed. We note that the proposals as set out in the current suite of consultation documents by Heathrow Airport in relation to the historic environment broadly follow this approach.

2. Overarching comments

2.1 Historic England and Heathrow Airport Ltd signed a Service Level Agreement (SLA) in 2017 to help ensure a positive approach to historic environment issues around the expansion of the airport. Significant progress is now being made across various workstreams.

2.2 Given the nature of the Development Consent Order process, we understand that at this stage the proposals being put forward are necessarily broad. As a result, we are likely to have further comments once the scheme has been refined and the resulting impacts are better understood. For example, once boundaries for the expanded airport are confirmed, all involved will have a much better understanding of the likely impacts on several conservation areas in the area. Similarly, confirmation of road and rail access points will allow a much better judgment as to construction impacts.

2.3 We note that there are no references across the various documents being consulted on regarding the risks of the cumulative effects of the various elements of the proposed scheme. The potential effects on the Harmondsworth conservation area offer an illustration of this. In addition to the land-take for the new runway encompassing around half of the village conservation area, there are also options put forward in the consultation for a new road to the north (the realignment of the A4) as well as the use of various sites around the village to accommodate land uses displaced from elsewhere.

2.4 While we acknowledge that the full extent of the potential development around Harmondsworth is unlikely to come forward, the cumulative effects should it do so are clearly highly significant and would potentially represent significant harm to the conservation area's significance, as well as that of its constituent listed buildings.

2.5 Similarly, the cumulative impacts from previous investigations on archaeological remains have already become very substantial and will increase further with the new proposals – however, unique opportunities to advance knowledge can arise from the cumulative gathering of information from multiple investigations. The risks posed by the potential cumulative effects of development on the historic environment are also a factor elsewhere around an expanded airport, and should be identified as an issue to be addressed within the scheme.





2.6 Our further comments below take a number of the documents that form the consultation proposals in turn.

3. *Our Emerging Plan*

3.1 Runway options

3.2 We consider that any physical, visual and noise impacts on the historic environment, including those on the setting of heritage assets should be properly considered in deciding on the precise location of a new runway.

3.3 We note the design requirement for any new runway to be separated from the existing northern runway by a minimum of 1,035 metres, and that as a result the land-take for the expansion of the airport would mean the loss of a large part of the Harmondsworth conservation area and a number of listed buildings, together with impacts on the setting of several further buildings, including the Grade I listed Great Barn. As a result we would be strongly opposed to any proposal to extend the boundary further north.

3.4 We note that all three options (A2, A3 and A4) for the precise runway location on an east-west axis also have implications for the historic environment in other villages in the area, in particular Colnbrook and Sipson. While options A3 and A4 would be marginally further away from the two listed buildings in Sipson, we also note that option A2 would mean the runway would maintain a greater distance from a much larger number of designated assets in Colnbrook (including the conservation area). This would also mean a lesser degree of impact on the setting of these assets, including through noise effects.

3.5 Given the variations in the northern boundary (which we understand to be for operational reasons), the different options also have different effects within Harmondsworth. Given the quality of the diagrams available, it is difficult to be precise but option A3 would appear to encompass a further part of the built-up area of the village, including the Grade II listed Lodge, while the boundary for option A4 would also further encroach on the conservation area. Again, options A3 and A4 would have greater long-term effects on setting, both visually and through noise, than A2.

3.6 While all options under consideration for runway location have major harmful effects on the historic environment, for the reasons set out above, we would prefer option A2 to be taken forward should expansion proceed. In the event of expansion, adequate mitigation measures should be implemented given the likely position of the new runway in relation to Harmondsworth, including the maximum possible measures to address the noise impacts on the historic environment.

3.7 Taxiways





3.8 We note the suggestion that an extra taxiway could be created to the north of the existing northern runway. While analysis of this is constrained by the quality of the maps available, this will inevitably lead to greater noise effects on the designated heritage assets at Harlington, including the conservation area in the centre of the village. This taxiway would also appear to encompass the Grade II listed memorial to General Roy, which is situated adjacent to the existing northern perimeter road. Both these factors should be appropriately considered as part of this proposal.

3.9 M25 realignment

3.10 We note that the M25 realignment would involve substantial new land-take and which would require assessment for archaeological impact.

3.11 Local road diversions

3.12 A4 – of the three options shortlisted for the diversion of the A4, we consider option 6C to potentially have the least adverse impacts on the historic environment, in part due to the use of a tunnel for a portion of the new road. While this option would have an effect on the setting of Colnbrook conservation area at the western end, it would also have the least effect on the setting of Harmondsworth conservation area and its constituent listed buildings as seen from the north. Given the likely cumulative effect of options 2E or 3A with the expanded airport boundary to the south, we would suggest option 6C is the least harmful in historic environment terms.

3.13 A3044 – our only comment on these options is that if option 3G were to be progressed, we would wish to see the avoidance of any harmful impacts to the Grade II listed Mildridge Farmhouse on Horton Road and the Grade II listed City Post by the Colne Brook.

3.14 Northern Perimeter Road – as indicated above, changes to the road here will have an impact on the Grade II listed memorial to General Roy. This needs to be adequately considered as part of proposed alterations in this area.

3.15 Rivers and flood storage

3.16 The Colne Valley is known to contain peat deposits and associated early prehistoric archaeological remains which would be vulnerable to re-contouring operations and to changes in the water table. Many of the potential sites lie outside of the currently proposed EIA study area which should be reviewed and extended if they are to be progressed. Hydrological specialists should work with archaeologists to assess and mitigate risk. Please see further comments on this subject at paragraph 4.3 in relation to *Our Approach to the Historic Environment*.





- 3.17 Airport supporting facilities, car parking, displaced uses, airport related development and construction requirements
- 3.18 Please see our detailed comments (attached as an annex to this response) in relation to the sites in Appendix 3 that have been identified as potentially being suitable for airport related development. In particular, we consider at this stage that there should be greater consistency in how individual heritage assets are identified and considered as part of current thinking on future land uses. It is important that an understanding of the significance of these assets and how it may be affected is properly considered as detailed design proposals emerge.
- 3.19 However, in terms of how demand for additional airport related development might best be delivered, we would note that at this stage any estimate of the level of additional demand for new development (rather than displaced uses) as a result of an expanded airport should be treated with caution, not least due to the long timescales involved. It is therefore important to stress that all involved should seek the greatest degree of integration with the Local Plans of the adjacent local authorities to ensure a properly plan-led approach to the various elements of new development beyond the boundaries of an expanded airport, including ensuring the selection of appropriate and sustainable sites and minimising/mitigating environmental impacts.
- 3.20 In terms of construction requirements, we would repeat that until further details are available in relation to access points for both road and rail, it is not possible to comment meaningfully on any potential effects on the historic environment. In relation to the criteria set out for the selection of potential construction sites, we recommend that a further bullet point is added to the effect of 'sites should not have an adverse impact on any designated or non-designated heritage assets'.

4 *Our Approach to the Historic Environment*

- 4.1 We welcome the research-led approach to the consideration of historic environment issues as set out in this document. This largely reflects the requirements of the draft ANPS, and you will be aware of the progress made on associated activities under the terms of the SLA between Heathrow Airport Ltd and Historic England. It is important that this approach results in a strategy for the historic environment that understands the context and significance of all heritage assets affected, and the design and mitigation response is appropriately informed by this baseline.
- 4.2 Enhanced public access, engagement and interpretation are key elements in this. For example, there will be many opportunities for natural and historic environment interests to work together on green infrastructure. The proposed Cultural Interpretation Framework



should find ways of raising public awareness of the results of previous archaeological interventions, and the history of the area generally. We also have a number of further points.

- 4.3 We note the text relating to Heritage at Risk at sections 3.4 and 7.3. We would refer you to the Appraisal of Sustainability (AoS) for the revised draft ANPS (paragraph 11.10.11) which takes a wider view, and specifically includes local authority 'at risk' registers, the local planning authority local list and to local knowledge and expertise in relation to heritage assets likely to be affected by airport expansion. This needs to be reflected in the text.
- 4.4 We would also welcome some further detail in relation to the potential for heritage assets currently in viable uses to become at risk as a result of airport expansion. Assets in Harmondsworth provide an illustration of this – the Great Barn, St Mary's Church and the Five Bells public house would all be significantly affected by the physical, visual and noise effects of a new runway which would almost certainly present a challenge for their ongoing use as at present. Airport expansion should not create a situation where further assets are forced on to the Register over time in addition to those that may disappear completely.
- 4.5 In relation to the initial list of designated heritage assets identified as being affected on page 11, we would suggest that Lanz farmhouse and the King William IV public house (both on Harmondsworth Lane and listed Grade II) will be subject to significant effects should the westernmost runway option be taken forward. These should both be included at paragraph 3.3.11.
- 4.6 We would stress that any diversions of rivers around the airport will have an impact on hydrology and could lead to locally waterlogged deposits experiencing periods of drying which would be detrimental to preservation of archaeological remains within such deposits. Appropriate testing and modelling of the water environment before, during and after diversions could be required.
- 4.7 The diversions of the rivers to a new route may itself impact upon archaeology – within the valley/flood plain the likelihood is high for the presence of paleochannels which have the potential to contain paleoenvironmental deposits of archaeological significance. Within areas of parkland/pasture etc Lidar data (as well as geophysical survey) may be of use in locating potential significant former channels.
- 4.8 Specific archaeological comments from the Greater London Archaeological Advisory Service (GLAAS) are attached at Annex 2. A key point is that the project should build upon the innovation and success of the T5 archaeology strategy and embrace a research-led approach from an early stage.



- 4.9 We note the commitment to minimising/mitigating setting effects with regard to certain assets at section 7.1.3 – please see our comments in Annex 1 in relation to the Mayfield Farm site.
- 4.10 We welcome the text in section 8 that reflects the ANPS requirement that the scheme design should look to respond to local character and where possible make a positive contribution to the historic environment. We look forward to further discussions as to how this can be achieved as the design of the scheme is progressed, including wider mitigation and compensatory proposals.
- 4.11 The requirements of the draft ANPS and the related text in the AoS in relation to enhancement measures should be borne in mind here. Para 5.193 in the ANPS and 11.10.12 & 11.12.14 set out explicitly the type of measures that can contribute to the conservation and enhancement of the historic environment as part of the DCO process, and a programme of detailed enhancement proposals will need to be provided as part of this.

5 *Our Approach to Noise*

- 5.1 We note that references to likely noise impacts on the historic environment are within *Our Approach to the Historic Environment*, rather than this document. While we are reassured that work is getting under way in assessing such impacts via the SLA, we consider that it would be helpful to have an explicit reference to the ANPS requirement (at paragraph 5.192) to detailed studies in this area within the noise document itself.
- 5.2 Given this ANPS requirement, we recommend that effects on the historic environment are also included within the noise envelope framework that will be developed after this consultation, and explicitly included within the terms of reference for the associated Noise Envelope Design Group.
- 5.3 We recognise that work in relation to noise insulation works and a compensation scheme for properties and communities affected by increased noise is at a very early stage, while in addition to this, historic buildings are often highly sensitive to such interventions. Any proposals for such work would need to be informed by an assessment of the significance of the building in question rather than as part of a wider, standard scheme.
- 5.4 Nevertheless, we would wish to ensure that heritage assets are properly considered as part of any scheme and eligible wherever possible, and to see innovative and successful mitigation measures to address the inevitable noise impacts on the historic environment.
- 5.5 Finally, it should be noted that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific





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development proposal which may subsequently arise from these documents, and which may have adverse effects on the historic environment.

- 5.6 I trust these comments are helpful. We would be very pleased to discuss these points further in person if that would be useful, but please do not hesitate to contact me should you require any further information in the meantime.

Yours faithfully

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Annex 1 – detailed comments in relation to Appendix 3: sites potentially suitable for airport related development.

We consider that there is some inconsistency in the way designated heritage assets are currently taken into account across the range of sites identified as potentially suitable for airport related development. The comments below are therefore intended to ensure consistency in the way these assets are identified in the text and on the maps, referred to in terms of existing planning policy and represented in the short sections setting out current thinking on future appropriate uses. While we acknowledge that timescales are such that any potential airport related development may be some years off, we would like to ensure that all relevant heritage assets are properly considered as detailed proposals for potential development begin to emerge.

We would stress the need for an assessment of the significance of each of these assets (and the likely impact of any development on this significance) when moving from proposed land uses and indicative capacities to detailed development briefs. The table below includes comments from GLAAS covering undesignated archaeology in London – the relevant local historic environment record service should be consulted for undesignated archaeology outside London.

Ref	Name	Comments	Local Planning Authority
A2	Saxon Way	This site is adjacent to the Harmondsworth conservation area. The CA should be identified on the map and the designation should be explicitly referenced in the Planning Policy section. ‘Careful consideration of impacts on the CA and its setting’ should be included in the Appropriate Uses section. The site lies within the Heathrow Archaeological Priority Zone so should be assessed for archaeological interest.	Hillingdon
A4	Land at Holloway Lane	This site is adjacent to the Harmondsworth conservation area (CA). The CA should be identified on the map and the designation should be explicitly referenced in the Planning Policy section. ‘Careful consideration of impacts on the CA and its setting’ should be included in the Appropriate Uses section.	Hillingdon



		The western part of the site lies within the Harmondsworth Archaeological Priority Zone and has known multi-period archaeological interest.	
A5	West Sipson/ Bath Road	The site lies within the Heathrow Archaeological Priority Zone so should be assessed for archaeological interest.	Hillingdon
A7	North Sipson/M4 Spur	The site lies within the Sipson Archaeological Priority Zone so should be assessed for archaeological interest.	Hillingdon
B2	Sipson Lane South/ Harlington	This site is adjacent to a number of listed buildings and Harlington CA. All of these assets should be identified on the map and the designations should be explicitly referenced in the Planning Policy section. 'Careful consideration of impacts on these assets and their settings' should be included in the Appropriate Uses section.	Hillingdon
C1	Land at Cranford Lane	This site is adjacent to Harlington CA to the west and Cranford CA to the east. Each CA contains a number of listed buildings, including the Grade I Church of St Peter & St Paul in Harlington. There are further listed buildings in Harlington that are adjacent to the site on the high street south of the CA. All of these assets should be identified on the map and the designations should be explicitly referenced in the Planning Policy section. 'Careful consideration of impacts on these assets and their settings' should be included in the Appropriate Uses section.	Hillingdon
C2	Land at East Perimeter Rd	The site lies within the Heathrow Archaeological Priority Zone so should be assessed for archaeological interest.	Hillingdon
D1	Land at Hatton Cross/Faggs Rd	Large partly quarried site so should be assessed for archaeological interest	Hounslow
E1	Mayfield Farm	We note that the text on this site identifies the presence of two Scheduled Monument designations in this location – both of these should be referenced in the Planning Policy	Hillingdon





		<p>section. It should also reference the East Bedfont Archaeological Priority Area which covers the entire site. Please note that that these Scheduled Monuments are nationally important archaeological sites that are protected under the 1979 Ancient Monuments & Archaeological Areas Act. We consider that the entire site will contain considerable archaeological potential and any proposed development that would encompass them will require appropriate investigation to ensure that any development will not cause harm to their significance. Significant archaeological features that exist outside the designated areas are likely to be considered of equal national importance to the features within the scheduled monuments and would be subject to the same policies as designated assets, in accordance with para 139 of the NPPF. There should be a presumption that scheduled monuments and associated remains of equivalent significance should be protected and preserved in-situ. We would encourage imaginative green infrastructure design to better reveal the sites' significance as a potential positive benefit to (partly) offset harm elsewhere</p> <p>The development site is also adjacent to the Bedfont Green CA, which contains a number of listed buildings. All of these assets should be identified on the map and the designations should be explicitly referenced in the Planning Policy section. 'Careful consideration of impacts on these assets and their settings' should be included in the Appropriate Uses section.</p>	
E2	Land at Staines Rd/ Clockhouse Rd	The site lies within the Heathrow Archaeological Priority Zone so should be assessed for archaeological interest.	Hounslow
E3	Land at London Rd/ Short Lane	The Planning Policy section identifies that the land is situated within a Site of High Archaeological Potential (Spelthorne DC designation). This should be reflected in the Appropriate Uses section.	Spelthorne
E4	Land at Bedfont Rd/	The Planning Policy section identifies that the land is partially situated within a Site of High Archaeological	Spelthorne





	Long Lane	Potential (Spelthorne DC designation). This should be reflected in the Appropriate Uses section.	
F2	Site bounded by Southern Perimeter Rd, Pk Rd and Stanwell Moor Rd	Site includes the southern end of the Stanwell Cursus, a major undesignated Neolithic monument, the survival of which should be established	Spelthorne
G4	Land bounded by Bath Rd, Poyle Rd and Colne Brook	We note the suggestion that it is the eastern section of this site that could be developed for employment uses to form an extension to the existing Poyle Industrial Estate. Nevertheless, the site in its entirety is adjacent to the Colnbrook CA, while there is a Grade II marker post in the south-western corner of the site. These and other listed buildings in the vicinity should be identified on the map and the designations should be explicitly referenced in the Planning Policy section. 'Careful consideration of these assets and their setting' should be included in the Appropriate Uses section.	Slough
G5	Land bounded by Arthur Jacob Nature Reserve and Poyle Rd	As with site G4, we note that the suggestion at this stage that it is the eastern section of this site could be developed for employment uses. Please note that the Grade II Poyle Farmhouse is within this section of the site and should be identified on the map. The designation should be explicitly referenced in the Planning Policy section, and 'Careful consideration of the Farmhouse and its setting' should be included in the Appropriate Uses section.	Slough
G7	Land bounded by Bath Rd, M25 and Stanwell Rd	The site lies within the Heathrow Archaeological Priority Zone so should be assessed for archaeological interest.	Slough
H3	Site south of Colnbrook bypass and north of the village	We note the identification of the listed buildings and the Colnbrook CA in the Characteristics section. While it is difficult to be precise given the quality of the maps available, it would appear that at least part of the site in question is actually within part of Colnbrook CA, and that	Slough





		<p>there is in fact two listed buildings on the site (Tanhouse Farm and the Barn to the south east are each listed separately, both Grade II). These designations (together with the other listed buildings in the vicinity) should be identified on the map and be referenced in the Planning Policy section. 'Careful consideration of these assets and their settings' should be included in the Appropriate Uses section.</p>	
I5	Thorney Mill Road	<p>We note the suggestion at this stage that the site be used for rail linked industrial activities in the future. As such, we consider there to be limited potential for any impacts on the adjacent West Drayton Green CA or any of the listed buildings within it. However, for the purposes of consistency and awareness, these designations should be identified on the map and referenced in the Planning Policy section.</p>	Hillingdon
J1	Western International Market	<p>We note the identification of the listed drinking fountain within the site, although we would point out there is some text missing. This designation should be marked on the map.</p> <p>The site lies largely within the Cranford Archaeological Priority Area, so should be assessed for archaeological interest.</p>	Hounslow



Annex 2: GLAAS comments on Heathrow Airport Expansion Consultation ('CON1')

OUR APPROACH TO HISTORIC ENVIRONMENT, January 2018

General: the overall approach appears consistent with policy and recognises the area's archaeological interest. There is much detail to come in technical papers but that should be fine as long as these apply best practice to turn the general approach into specific deliverables. There are some potentially innovative features which will need to be worked up in collaboration with key stakeholders (including GLAAS and other local government archaeologists).

Section	Comment
2.2 National policy	Should make reference to identifying undesignated heritage assets of national importance as this has policy implications. Whilst the ability to record is not a consideration in accepting loss or harm (2.2.6) it is a policy requirement to record and advance understanding (including publication) if harm occurs.
2.3 Regional and local policies	The enhanced role of Archaeological Priority Areas in both the draft London Plan and the new Hillingdon Local Plan should be recognised (together with any equivalents outside London). Hillingdon's APAs were reviewed in 2013 and much of the study area is in an APA or APZ. Hounslow has yet to have a modern review.
3.3 Initial consideration of heritage assets	We should flag early concern about Mayfield Farm SM, potentially could encourage an innovative green infrastructure use (restoration/interpretation maybe). Stanwell Cursus is a candidate site for national importance if significant remains survive. Understanding the survival of this monument should be a specific assessment objective. Recognising and interpreting this site would be desirable if feasible.
5.4.1 Understanding archaeological landscapes	We anticipate further consultation on the detailed approach. At this stage we urge caution in relation to the reliability of 'negative evidence' from aerial and geophysical survey. The latter in particular has often proved unreliable on the brickearths and gravels in and around London. Different evaluation strategies may be appropriate to dryland plateau and river valley locations, and to the inhabited villages reflecting the different potential of each. A bespoke specialist assessment of Lower/Middle Palaeolithic potential of the Quaternary geology is recommended. Clearly further discussion will be necessary in relation to what is envisaged by 'targeted trial trenching'.



	<p>A research framework will be essential to guide assessment of significance and inform evaluation and mitigation strategies. This should draw upon recent synthetic research such as Thames Through Time, England and the Roman Rural Settlement Project. It should also consider how Heathrow can link to existing data-sets and other major projects (e.g. HS2). It will be important to bring a range of specialists together to develop a robust framework – for example in workshops. It would be useful to include people involved with T5 and other major projects in the vicinity.</p>
7 Design Approach	<p>The general principles are supported and indicate clear potential to be informed by archaeological sites and understanding. Restoration of a few key sites for might be considered for interpretative purposes.</p>
8 Opportunity	<p>We support the idea of a Cultural Interpretation Framework to engage local communities and suggest that schools prehistory and use of scientific techniques would be areas to explore.</p> <p>We agree that use of digital data (existing and new) will be the way forward and would like to explore the scope of this further to ensure the research potential is maximised.</p> <p>As a legacy we suggest exploring how the many discoveries from the Heathrow/Colne Valley area might be better interpreted and presented in future. One option might be a ‘Museum of Middlesex’ or ‘Colne Valley Visitor and Learning Centre’ co-locating historic buildings, archaeology and access to the natural environment.</p>
Collaboration and Standards	<p>We would welcome a statement of how HAL intends to work with local government archaeologists and conservation officers as well as Historic England and a commitment to best practice and innovation in the delivery of historic environment works. For archaeology that would include reference to the Chartered Institute for Archaeologists standards and registration as minimum. We would also seek assurances on a contractual framework that will provide quality and continuity through the project – T5 set an example in this respect.</p> <p>Museum storage needs to be identified as an issue from the outset and discussion with Museum of London is recommended.</p>