

Direct Tel: 020 7928 7888
Direct Email: pippa.kelly@watermangroup.com
Our Ref: WIE11701.180228.ES.SoCLtr
Date: 28 February 2018

Ms Seonaid Carr
Planning Department
London Borough of Camden
2nd Floor, 5 Pancras Square c/o Town Hall
Judd Street
London
WC1H 9JE

Dear Ms Carr

Re: Transformation of the Ugly Brown Building – Statement of Conformity

Introduction

A detailed planning application for the transformation of the Ugly Brown Building ('the Site') was submitted to the London Borough of Camden (LBC) in September 2017 (application reference 2017/5497/P) for the demolition of existing buildings (Class B1 and B8) and erection of 6 new buildings ranging in height from 2 storeys to 12 storeys in height above ground and 2 basement levels comprising a mixed use business floorspace (B1), residential (C3), hotel (C1), gym (D2), flexible retail (A1 - A4) and storage space (B8) development with associated landscaping work (hereafter referred to as 'the Development').

Following post submission discussions with LBC planning, design and conservation officers, there have been a number of design amendments to the Development. This letter comprises a Statement of Conformity that has been prepared in respect of some of the environmental technical studies (the Air Quality Assessment, Noise Assessment, Historic Desk Based Assessment and Outline Construction Management Plan) undertaken by Waterman Infrastructure & Environment (Waterman IE), in light of the design amendments. This letter should be read in conjunction with the aforementioned reports.

Proposed Amendments

The proposed amendments to the submitted Development and reason for changes are as follows:

Plot A

- Upper two storeys of Plot A have been set back from the canal-side, with the terrace now at level 05, in order to reduce height impact on the canal;
- Upper two floors have become a rooftop pavilion set back from the canal and moved to align with the St Pancras Way façade;
- Colonnade on the canal-side and on the St Pancras Way façade has been infilled;
- Corner balconies on the canal side elevation have been grouped at opposite ends of the façade;
- Brick warehouse typology has been introduced to lower massing, with glazed / precast fin pavilion above; and
- No changes internally (except for the set back on 05/06 floors).

Plot B (Ted Baker)

- Lower portion now dark masonry with deep slot windows to hotel rooms and large recessed / flush openings to Ted Baker and hotel in square. Line of building has been pulled out to conceal columns at base;
- Upper floors: two-storey stepping fins have been introduced to façades;

- Rounding of the building's corner to reduce overhang at the St Pancras Way / square entrance; and
- Internally: no changes to upper levels; hotel rooms and entrance areas have been re-planned in part.

Plot C

- Building sections have been renamed as follows:
 - C1 office (canal-side);
 - C2 residential;
 - C3 large office building; and
 - C4 pavilion.
- **C1 Office** – Scale, warehouse typology, rooftop pavilion and materials now match Plot A. Core changed and building line amended to the west;
- **C2 Residential** – canal facing building line pulled back to align with Granary Street to create new green space on the canal-side. All residential units re-planned, with an additional 4 residential units providing a total of 73 residential units (53 private, 10 social, 10 intermediate), previously 69 residential units;
- **C3 Office** - now a single building, with the same warehouse typology and rooftop pavilion as Plot A & C1. Colonnade at ground floor within the south west corner;
- **C3/C1 link bridge** – this remains as a 3 storey, 3 structural bay bridge which now spans between the two buildings at level 02-04; and
- **C4 pavilion** – façade further refined and presented as a 'wedge' to form part of the Ted Baker base.

In order to determine whether the proposed amendments to the Development result in any material changes to the environmental technical reports, Waterman IE has reviewed the revised drawings issued by Bennetts Associates on the 23 February 2018 and area / accommodation schedule issued on the 26 February 2018. A list of the revised planning application drawings is provided in **Annex 1**.

Table 1 provides a breakdown on the submitted and proposed floor areas by land use.

Table 1: Submitted and proposed floor areas of the Development (Gross Internal Areas (GIAs))

Land Use	Submitted (GIA sqm)	Proposed (GIA sqm)	Difference (GIA sqm)
Office (B1)	55,079	54,522	-557
Residential (C3)	7,110	7,561	+451
Retail (A1-A4)	5,805	5,858	+53
Gym (D2)	1,376	1,601	+225
Hotel (C1)	4,625	4,913	+288
Storage (B8)	6,081	6,011	-70
Total	80,076	80,466	+390

As can be seen from **Table 1**, there would only be an additional 390m GIA floorspace with the proposed amendments. The maximum height and footprint of each building would remain as per the submitted Development.

Statement of Conformity

The remaining sections of this letter set out the conclusions of Waterman IE's review of the design amendments of the Development subject to approval.

The baseline conditions set out in the Waterman IE environmental technical reports remain valid and appropriate for assessing how the design amendments affect the environmental technical reports.

The amendments would not result in any material changes to the conclusions of the Waterman IE technical reports (with the exception of the Air Quality Neutral Assessment, a revised version is appended to this letter as **Annex 2**). A Statement of Conformity for each environmental technical report undertaken by Waterman IE is provided below.

Air Quality Assessment

The project transport consultants (Caneparo Associates) have confirmed the amended drawings would not affect the vehicular traffic flows previously predicted for the Development and provided for use in the air quality assessment. As the traffic data remains the same, there would be no changes to the Air Quality Assessment previously undertaken in relation to traffic emissions. In addition, there are no further changes to the location of the energy centre, the proposed combustion plant, the location of the flues or the proposed building height. Therefore, there are no changes to the assessment of emissions from the energy centre plant previously undertaken. Furthermore, there are no changes to the assumptions previously made regarding construction traffic or activities as a result of the minor changes to the Development.

Having regard to the above, the changes to the Development brought about through the amended drawings would not affect the conclusions of the Air Quality Assessment.

As noted above, a revised version of the Air Quality Neutral Assessment is provided in **Annex 2**. The Air Quality Neutral Assessment has been re-calculated using the revised area schedule and it has been concluded that the Development would still be 'air quality neutral' with respect to both transport and building emissions following the proposed amendments. No further mitigation measures would be required.

Noise Assessment

The Noise Assessment as submitted in support of the application assessed both the suitability of the Site for the proposed future uses as well as assessing the impacts of the Development in terms of road traffic noise, building services noise and noise associated with breakout from the proposed restaurants and cafés (Use Class A3) within the flexible retail space provided in Plots A and C.

The design changes as proposed and described earlier in this letter are largely minor and cosmetic in nature and would not result in any material changes to the findings presented within the submitted noise assessment. As such, Waterman IE consider that the information provided within the Noise Assessment remains valid and is representative of the potential impacts associated with the future operation of the Development.

Historic Environment Desk Based Assessment (below ground archaeology only)

As concluded in the Historic Environment Desk Based Assessment, the likely impact from the Development would result from activities such as excavations ahead of basement construction and foundations, site investigations and demolition below ground level. However, the whole extent of the Site has been subject to extensive truncation down to several metres into natural London Clay prior to the construction of the Granary (built in 1864), during strengthening works to the canal, demolition of the Granary, and prior to the construction of the existing building. It is therefore likely that any below ground deposits have been removed and/or destroyed by the previous phases of works within the Site. Overall, therefore, it is considered that the Development will have a negligible impact on below ground deposits due to the high level of known truncation within the Site.

The changes proposed through the amended drawings would not result in a change in the extent of excavation works compared with those previously assessed. As a result, there would be no material change to the previous assessment. It is still recommended that no further below ground

archaeological works are required given there is no potential for the site to contain any below ground deposits from any periods.

Outline Construction Management Plan

The Outline Construction Management Plan (CMP) is based on LBC's Guidance for Construction Management Plans with additional considerations such as waste management and pollution incident control procedures. The proposed design changes to the Development would not affect the procedures provided within the outline CMP as the construction works would still be required to comply with the requirements of relevant environmental legislation and local planning policy.

The overall construction strategy remains unknown at this stage and is dependent upon how the appointed Principal Contractor intends to undertake the construction activities at the Site. Once appointed, the Principal Contractor will be required to amend the CMP with the details of the construction activities. It is understood that the Principal Contractor will be appointed once planning permission has been granted. It is assumed that a final CMP will be required to be submitted under a planning condition in due course.

The design changes have not altered the sequence of the works, the only change would be the timescales for each phase of construction. For example, Table 1 within the outline CMP provided a start date of Q1 2018 for Plot A, which would need revising to a later date. An updated construction programme would be submitted with the final CMP.

In summary, the information provided in the outline CMP remains valid and would continue to be updated as a live document once planning permission has been approved and a Principal Contractor has been appointed.

Conclusions

In summary and to reiterate, it is concluded that the design amendments do not materially alter the environmental technical reports undertaken by Waterman IE submitted for planning. The Air Quality Assessment, Noise Assessment, Historic Desk Based Assessment and Outline Construction Management Plan submitted for planning remain valid. The Air Quality Neutral Assessment has been updated and replaced and concludes that the Development remains 'air quality neutral' with respect to both transport and building emissions.

If you do have any comments or queries please contact me on 020 7928 7888.

Yours sincerely



Pippa Kelly
Associate Director
For and On Behalf of Waterman Infrastructure & Environment Ltd

cc. Jason Russell, Reef Estates
Luke Thrumble, DP9

Enc: Annex 1: Revised Planning Application Drawings
Annex 2: Revised Air Quality Neutral Assessment

Annex 1: Revised Planning Application Drawings

Drawing Number	Drawing Title	Revision Number
1603_P_001	Proposed site plan	D
1603_P_098	Proposed Basement Plan B2	E
1603_P_099	Proposed Basement Plan B1	H
1603_P_100	Proposed Level 00	J
1603_P_101	Proposed Level 01	G
1603_P_102	Proposed Level 02	E
1603_P_103	Proposed Level 03	F
1603_P_104	Proposed Level 04	E
1603_P_105	Proposed Level 05	G
1603_P_106	Proposed Level 06	G
1603_P_107	Proposed Level 07	F
1603_P_108	Proposed Level 08	H
1603_P_109	Proposed Level 09	H
1603_P_110	Proposed Level 10	G
1603_P_111	Proposed level 11	B
1603_P_RP	Proposed, Roof Plan	E
1603_P_230	Proposed Section BB	B
1603_P_231	Proposed Section CC	B
1603_P_232	Proposed Section EE	C
1603_P_241	Proposed Section FF	C
1603_P_302	Proposed East Elevation - Regent's canal	B
1603_P_303	Proposed South Elevation - Granary Street	C
1603_P_304	Proposed West Elevation - St Pancras Way	B
1603_P_311	Proposed Building A, North Elevation	D
1603_P_31	Proposed Building A, East Elevation	E
1603_P_313	Proposed Building A, South Elevation	E
1603_P_314	Proposed Building A, West Elevation	E
1603_P_321	Proposed Building B, North Elevation	D
1603_P_322	Proposed Building B, East Elevation	D
1603_P_323	Proposed Building B, South Elevation	D
1603_P_324	Proposed Building B, West Elevation	D
1603_P_331	Proposed Building C1 & C2 North Elevation	E
1603_P_332	Proposed Building C1 & C2 East Elevation	E
1603_P_333	Proposed Building C1 South Elevation	G
1603_P_334	Proposed Building C1 & C2 West Elevation	F
1603_P_341	Proposed Building C3 North Elevation	E
1603_P_342	Proposed Building C3 East Elevation	F
1603_P_343	Proposed Building C3 South Elevation	E
1603_P_344	Proposed Building C3 West Elevation	E
1603_P_350	Proposed Plot C4 Elevation	E

Annex 2: Air Quality Neutral Assessment

Appendix B: Air Quality Neutral Calculations

- 1.1 Calculations have been undertaken by Waterman Infrastructure & Environment (Waterman IE) to accompany a Statement of Conformity for design amendments to the redevelopment of The Ugly Brown Building, 2-6 St Pancras Way, London, NW1 0TB. The purpose of the calculations is to demonstrate how the Development performs against relevant 'air quality neutral' benchmarks.

Description of the Development

- 1.2 The Development is located in Inner London and would provide a mixture of uses including 73 residential units (Use Class C3), Hotel (Use Class C1), Office (Use Class B1), Retail (A1-A4) and Self-Storage (Use Class B8).
- 1.3 The total amount of floorspace proposed by the Development is set out below in **Table B1**.

Table B1: Proposed Land Uses

Land Use (Use Class)	Proposed Floor space Areas (GIA) (m ²)
Residential (C3)	7,561
Hotel (C1)	4,913
Office (B1)	54,522
Retail (A1-A4)	5,858
Basement Self-Storage (B8)	6,011
Gym (D2)	1,601
Total	80,466

Planning Policy and Guidance

The London Plan: The Spatial Development Strategy for Greater London; Consolidated with Alterations since 2011, 2016

- 1.4 Policy 7.14 'Improving air quality' of the London Plan¹ states that development proposals should:
- "...be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as AQMAs);..."*

The Draft New London Plan: The Spatial Development Strategy for Greater London, 2018

- 1.5 Policy SI1 'Improving Air Quality' of the Draft New London Plan² states that development proposals should not:
- "a) lead to further deterioration of existing poor air quality*
- b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits*
- c) reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality*
- d) create unacceptable risk of high levels of exposure to poor air quality."*

- 1.6 Policy SI1 also states that “*The development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development. All other developments should be at least Air Quality Neutral be at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as areas designated as AQMAs)*”.
- 1.7 Air quality positive measures have been identified in the ‘Mitigation Measures and Likely Residual Effects’ section of the Air Quality Assessment.

The Mayor’s Air Quality Strategy ‘Clearing the Air’, 2010

- 1.8 Similarly, the Mayor’s Air Quality Strategy³ states that: “*New developments in London shall as a minimum be ‘air quality neutral’ through the adoption of best practice in the management and mitigation of emissions*”.

Sustainable Design and Construction - Supplementary Planning Guidance, 2014

- 1.9 The Sustainable Design and Guidance – Supplementary Planning Guidance (SPG) provides updated guidance to support the implementation of the London Plan.
- 1.10 Further to Policy 7.14 of the London Plan, Section 4.3 of the SPG focusses on air pollution and the effects from the operation of new developments within Greater London. The SPG requires all new developments to be at least ‘air quality neutral’.
- 1.11 Paragraph 4.3.15 of the SPG states:
- “This policy applies to all major developments in Greater London. Developers will have to calculate the NO_x and / or PM₁₀ emissions from the buildings and transport elements of their developments and compare them to the benchmarks set out in Appendix 5 and 6.”*
- 1.12 The SPG presents emission benchmarks for buildings (associated with emissions from combustion plant introduced as part of a development to provide heating and power) and transport (associated with vehicle trips related to the operation of the development). It is considered that where a development does not exceed these benchmarks, then it is considered to be ‘air quality neutral’ and would not increase NO_x (oxides of nitrogen) and PM₁₀ (particulate matter of 10µm diameter or less) emissions across London as a whole. A discussion on the Building Emission Benchmarks (BEBs) and the Transport Emission Benchmarks (TEBs) as set out within the SPG is presented below.
- 1.13 In addition to the BEBs and TEBs, the SPG provides emissions standards for any proposed combustion plant (individual / communal gas boilers, solid biomass or Combined Heat and Power (CHP) plant) to be introduced as part of a development. These emissions standards must be complied with.

Building Emissions Benchmarks (BEBs)

- 1.14 Paragraph 4.3.17 and Appendix 5 of the SPG note that BEBs have been defined for a series of land-use classes for both NO_x and PM₁₀. The BEBs are presented in **Table B2**.

Table B2: 'Air Quality Neutral' Emissions Benchmarks for Buildings

Land Use Class	NO _x (g/m ²)	PM ₁₀ (g/m ²)
Class A1	22.6	1.29
Class A3 – A5	75.2	4.32
Class A2 and Class B1	30.8	1.77
Class B8	23.6	1.90
Class C1	70.9	4.07
Class C3	26.2	2.28
Class D2 (e)	284	16.3

- 1.15 It is noted that whilst the BEBs have been provided for PM₁₀, these only apply for developments which would introduce heating plants likely to produce significant PM₁₀ emissions. This would typically include heating plant operated by oil or solid fuel (including all biomass appliances). All other plant would not result in an increase in PM₁₀; therefore an assessment against the PM₁₀ BEBs would not be required.

Transport Emissions Benchmarks (TEBs)

- 1.16 Paragraph 4.3.18 and Appendix 6 of the SPG sets out the TEBs defined by a series of land-use class for both NO_x and PM₁₀. The TEBs are presented in **Table B3**.

Table B3: 'Air Quality Neutral' Emissions Benchmarks for Transport

Land Use	London Central Activity Zone	Inner	Outer
NO_x (g/m²/annum)			
Retail (A1)	169	219	249
Office (B1)	1.27	11.4	68.5
NO_x (g/dwelling/annum)			
Residential (C3)	234	558	1553
PM₁₀ (g/m²/annum)			
Retail (A1)	29.3	39.3	42.9
Office (B1)	0.22	2.05	11.8
PM₁₀ (g/dwelling/annum)			
Residential (C3, C4)	40.7	100	267

- 1.17 Section 4.3.18 of the SPG notes that the design of a development should encourage and facilitate walking, cycling and the use of public transport, thereby minimising the generation of air pollutants.
- 1.18 As well as providing benchmarks the SPG also recommends emission standards for combustion plant to comply with, in addition to meeting the overall 'air quality neutral' benchmark.

Air Quality Neutral Planning Support: GLA 80371, April 2014

- 1.19 In April 2014 the GLA published a report to provide support to the development of the Mayor's policy related to 'air quality neutral' developments. The report provides a method to enable a development to be assessed against the air quality neutral benchmarks set out in the Sustainable Design and Construction SPG.

- 1.20 The report provides a methodology required to apply the air quality neutral policy. It requires the transport and building emissions for the development to be identified and then compared to the benchmark emissions. The report notes that the building and transport emissions should be calculated separately and not combined.

Air Quality Neutral Calculation

- 1.21 The Air Quality Neutral Assessment of the Development has been based on the approach and methodology detailed within the Air Quality Neutral Planning Support document. The calculations are presented below.

Building Emissions

- 1.22 The energy centre for the proposed Development comprises two gas-fired CHP units and four gas boilers. The details of the energy centre are presented in **Table B4**.

Table B4: Calculation of the Total Building Emission

Unit	Release Rate (m/s)	NO _x Emissions (g/s)	Hours of Operation (hrs./annum)	Total NO _x (kg/annum)
Plot A/B CHP	10	0.0308	7270.8	806.2
Plot A/B Boiler	10	0.0070	3504.0	88.3
Plot A/B Boiler	10	0.0070	3504.0	88.3
Plot C CHP	10	0.0401	7884.0	1138.1
Plot C Boiler	10	0.0074	3679.2	98.0
Plot C Boiler	10	0.0074	3679.2	98.0
Total Building NO_x Emission				2,316.9

Note: For gas-fired plants PM₁₀ emission factors are not provided because gas-fired plants do not emit any significant level of particulates

The following assumptions on the hours of operation were received from Max Fordman: Plot A/B CHP would operate at an average of 83% throughout the year; Plot A/B boilers would operate for 40% of the year; Plot C CHP would operate at an average of 90% throughout the year; and Plot C boilers would operate for 42% of the year.

- 1.23 The Building Emission Benchmarks (BEB) for each land use category are presented in **Table B5** these are calculated by multiplying the floor area for each land use category with the Building Emission Benchmark presented in **Table B2**.

Table B5: Calculation of the Benchmarked NO_x Building Emissions for each Land-Use Category

Land Use	GIA (m ²)	Building Emissions Benchmark (gNO _x /m ² /annum)	Benchmarked Emissions (kgNO _x /annum)
Residential (C3)	7,561	26.2	198.1
Hotel (C1)	4,913	70.9	348.3
Office (B1)	54,522	30.8	1679.3
Retail (A1-A4)*	5,858	42.9	251.3
Basement Self-Storage (B8)	6,011	23.6	141.9
Gym (D2)	1,601	284	454.7
Total Benchmarked Building Emissions			3,073.6

Note: * The exact composition of each land use is not known, therefore an average of the A1, A2, A3, and A4 Emissions Benchmark have been used

- 1.24 The Total Building NO_x Emission of 2,316.9kg/annum is below the benchmark of 3,073.6kg/annum and the Development is therefore considered to be 'Air Quality Neutral', with respect to building emissions and no further abatement would be required.

Transport Emissions

- 1.25 Details of the trip generation per day for each land-use class have been provided by Caneparo Associates (the Applicant's transport consultant). The calculation of the total transport emissions for the residential components of the Development, as set out within the Air Quality Neutral Planning Support document, are presented in **Table B6**.

Table B6: Calculation of the Transport Emissions for each Land-Use Category

Land Use	Trips per day	Trips per annum	Average Distance per trip ^(a)	Distance travelled km/annum	Emission Factors (g/vehicle-km) ^(b)	Transport Emission (kg/annum)	
						NO _x	PM ₁₀
Residential (C3)	19	6,935	4.3	29,821	NO _x : 0.4224 PM ₁₀ : 0.0733	12.6	2.2
Hotel (C1)	160	58,400	4.3 ^(c)	251,120		106.1	18.4
Office (B1)	153	55,845	3.0	167,535		70.8	12.3
Retail (A1-A4)*	38	13,870	9.3 ^(d)	128,991		54.5	9.5
Basement Self-Storage (B8)	38	13,870	3.0 ^(e)	41,610		17.6	3.1
Gym (D2)	1	365	3.0 ^(f)	1,460		0.6	0.1
Total Transport Emissions						262.1	45.5

Note: ^(a) Average distance travelled by car per trip for sites within Central London

^(b) Emissions factors used as presented in Table 10 of the Air Quality Neutral Planning Support Document

^(c) no distance for C1 land use therefore the C3 distance has been used

^(d) no distance for A2, A3 and A4 land uses therefore the A1 distance has been used

^(e) no distance for B8 land use therefore the B1 distance has been used

^(f) no distance for D2 land use therefore the B1 distance has been used

- 1.26 The Benchmarked Transport Emissions for the residential element of the Development are calculated by multiplying the number of residential units within the Development (73 units) with the TEBs (as presented in **Table B3**). The benchmarked transport emissions for the retail, office, hotel and safe storage elements of the Development have been calculated by multiplying the relevant GIA (m²) with the relevant TEBs (as presented in **Table B3**). The total benchmarked transport emissions for the Development are presented in **Table B7**.
- 1.27 The total benchmarked transport emissions for the Development are presented in **Table B7**.

Table B7: Calculation of the Benchmarked Transport Emissions for each Land-Use Category

Land Use	Number of units	GIA (m ²)	Transport Emissions Benchmark (g/m ² /annum)		Benchmarked Emissions (kg/annum)	
			NO _x	PM ₁₀	NO _x	PM ₁₀
Residential (C3)	73	-	234	40.7	17.1	3.0
Hotel (C1) ^(a)	-	4,913	234	40.7	1149.6	200.0
Office (B1)	-	54,522	1.27	0.22	69.2	12.0
Retail (A1-A4) ^(b)	-	5,858	169	29.3	990.0	171.6
Basement Self-Storage (B8) ^(c)	-	6,011	1.27	0.22	7.6	1.3
Gym (D2) ^(d)	-	1,601	1.27	0.22	2.0	0.4
Total Transport Emissions					2,235.6	388.2

Note: ^(a) no transport emissions benchmark for C1 land use therefore the C3 benchmark has been used

^(b) no transport emissions benchmark for A2, A3, and A4 land use therefore the A1 benchmark has been used

^(c) no transport emissions benchmark for B8 land use therefore the B1 benchmark has been used

^(d) no transport emissions benchmark for D2 land use therefore the B1 benchmark has been used

- 1.28 The total Transport Emissions for NO_x (262.1kgNO_x/annum) are below the Transport Benchmark NO_x Emissions (2,235.6kgNO_x/annum). Similarly, the Total Transport Emissions for PM₁₀ (45.5kgPM₁₀/annum) is below the Transport Benchmark PM₁₀ Emissions (388.2kgPM₁₀/annum). Therefore, the Development is considered to be 'Air Quality Neutral' in relation to transport emissions, and no further mitigation measures would be required.

References

- 1 Greater London Authority (2016): The 2015 London Plan with Minor Alterations 2016, Spatial Development Strategy for Greater London, GLA, London.
- 2 Greater London Authority (2018): Draft New London Plan, Spatial Development Strategy for Greater London, GLA, London.
- 3 Greater London Authority (GLA), 'The Mayor's Air Quality Strategy: Cleaning London's Air', London, 2002.