



REPORT TO EXECUTIVE

PORTFOLIO AREA: ECONOMIC DEVELOPMENT

Date of Meeting: 14 February 2011

Public

Key Decision: Yes

Recorded in Forward Plan: Yes

Inside Policy Framework

Title: DRAFT ENERGY EFFICIENCY SUPPLEMENTARY PLANNING DOCUMENT

Report of: Assistant Director Economic Development

Report reference: ED.05/11

Summary: This report sets out the responses to the consultation on the draft Supplementary Planning Document (SPD). Included is a summary of the main consultation responses received and the proposed amendments to be made to the document as a result.

Recommendations:

- 1 This report is made available for consideration by the Environment and Economy Overview and Scrutiny Panel at its meeting on 24 February 2011.
- 2 A further report is brought to Executive for its meeting on 14 March 2011, to consider referring the Supplementary Planning Document to Council at its meeting on the 26 April 2011 for adoption.

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Note: In compliance with Section 100d of the Local Government (Access to Information) Act 1985 the report has been prepared from the following papers: Draft Energy Efficiency Supplementary Planning Document; Reports DS 10/10 and ED 07/10

1. BACKGROUND INFORMATION AND OPTIONS

- 1.1 The Energy Efficiency Supplementary Planning Document has been listed as a document for production in the published Local Development Scheme. This forms part of the Local Development Framework to guide development in the District. This SPD amplifies Council Planning policies.
- 1.2 The supplementary planning document expands on Carlisle District Local Plan Policy CP9 which refers to the production of a Supplementary Planning Document on Energy Efficiency and Conservation. The document also has regard to the Local Plan Policy CP5 Design listing nine key design principles against which all development proposals will be assessed.

2. CONSULTATION

- 2.1 Council approved the document for consultation and a six week consultation took place from 3 September 2010. Nearly forty comments were received from consultees. Some concerned the structure of the document; others concerned the content and omissions, and some commended the Council in producing a promotional and encouraging document. A summary of the consultation responses is attached in Appendix 1.
- 2.2 The comments have been considered and some amendments are necessary to give precision and to update the advice in the light of national developments.
- 2.3 No further consultation is planned.

3. FEEDBACK FROM CONSULTATION

- 3.1 The document was generally welcomed for the range of applications promoted.
- 3.2 A request was made for more local implemented examples such as for heat pumps and for greater detail on micro generation. This is difficult as heat pumps, for example, do not need planning permission and therefore there is less awareness of their implementation.
- 3.3 Suggestions were made for clarity of the text to be improved which have been taken up to make it more readable.

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- 3.4 A couple of respondents requested that the SPD should set thresholds and standards to be attained for different types of development; it is considered that this would be better tested through Core Strategy policies at a later date as advised in PPS1 which covers the General Principles of planning policy.

4 CONCLUSION

- 4.1 Finalising the document will support Local Plan policy CP9. Whilst energy efficiency is a fast developing subject in order for the guidance to have optimum use its adoption would assist in demonstrating the Council's intention to helping others address their impact on the environment.

5 RECOMMENDATIONS

- 1 This report is made available for consideration by the Environment and Economy Overview and Scrutiny Panel at its meeting on 24 February 2011.
- 2 To consider referring the Supplementary Planning Document to Council at its meeting on 26 April 2011 for adoption.

6 REASONS FOR RECOMMENDATIONS

- 5.1 To consider issues raised at the consultation stage and to be able to proceed towards adoption of the Supplementary Planning Document.

7 IMPLICATIONS

- Staffing/Resources – The work has been resourced from within the Local Plans and Conservation (Planning Policy) Section.
- Financial – There are no financial implications.
- Legal – The preparation of a Supplementary Planning Document will comply with the requirements of Planning legislation.
- Corporate – The supplementary planning document will contribute towards creating more sustainable communities.
- Risk Management – Without this SPD there may be a lack of clarity on the intention of policies in the Local Plan.

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- Environmental – The overall effect of the SPD once adopted will be to improve the local environment.
- Crime and Disorder – None.
- Impact on Customers – The SPD will provide additional guidance, thus improving the service to customers of the Planning Service.
- Equality and Diversity –

Impact assessments

Does the change have an impact on the following?

Equality Impact Screening	Impact Yes/No?	Is the impact positive or negative?
Does the policy/service impact on the following?		
Age	No	--
Disability	No	--
Race	No	--
Gender/ Transgender	No	--
Sexual Orientation	No	--
Religion or belief	No	--
Human Rights	No	--
Health inequalities	No	--
Rurality	No	--

If you consider there is either no impact or no negative impact, please give reasons:

The document is general in nature, offering advice which has an impact on the environment.

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If an equality Impact is necessary, please contact the P&P team.

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Energy Efficiency Representations

Respondent	RepNo	Support	Chapt	Page	Para	Details
68	021					Producing a well informed up to date Energy Efficiency SPD will provide Development Management officers with a tool to enter early dialogue in relation to sustainability requirements. Advice could also be given in relation to what renewable energy applications would be suitable for different developments. The diagrams on pages 18 and 19 are considered particularly useful for this; the SPD also uses examples of existing schemes which help demonstrate the viability of renewable energy applications throughout the document.
Response:		Noted. The comments are welcomed.				
Proposed Change		None.				
38	002					<p>The Appendix should include reference to PPS5 and the Practice Guide and the further information available from English Heritage on dealing with climate change and its mitigation in the historic environment. I suggest including the links below in the document to Climate Change and your Home and the advice on our HELM website, particularly that relating to traditional buildings.</p> <p>Http://www.climatechangeandyourhome.org.uk/live/ http://www.helm.org.uk/ http://www.helm.org.uk/upload/pdf/Biomass-Energy.pdf?1285662704 http://www.helm.org.uk/upload/pdf/ign_part1_buildingregs.pdf?1285662704 http://www.helm.org.uk/upload/pdf/Draughtproofing%20and%20secondary%20glazing_1994.pdf?1285662704 http://www.helm.org.uk/upload/pdf/89410-EnergyConservation1.pdf?1285662704 http://www.helm.org.uk/upload/pdf/Energy%20Savings_1994.pdf?1285662704 http://www.helm.org.uk/upload/pdf/69945-MicroWind1.pdf?1285662704 http://www.helm.org.uk/upload/pdf/Microgeneration.pdf?1285662704 http://www.helm.org.uk/upload/pdf/49357-SolarElectric.pdf?1285662704</p>
Response:		Agree				
Proposed Change		insert references in Appendices				
38	003					The SPD sets out design considerations for site layout and orientation. Whilst traditional settlements were often built to take advantage of local micro-climatic conditions other influences were also at play and it will be important for new development to reflect local character and distinctiveness and not to slavishly adhere to the design considerations set out in the draft document where this might harm local character and distinctiveness.
Response:		Agree that there could be a reference to this factor in design. It is expanded on in the Council's draft SPD Achieving Well Designed Housing which is under revision.				
Proposed Change		Insert a reference to the need for locally distinct housing at the end of Para. 3.2 in a new paragraph.				

Respondent	RepNo	Support	Chapt	Page	Para	Details
	322	005				Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and therefore anticipate policies relating to cultural facilities. Theatres can provide a valuable opportunity to demonstrate ways in which local people can act in their own homes to become more environmentally efficient and reduce carbon emissions, and help mitigate the effects of climate change. Many theatre developments are attaining BREEAM ratings that demonstrate their commitment to being more environmentally efficient. Some will be required to display Energy Performance Certificates and The Theatres Trust is encouraging new and existing theatres to aim to meet the ambitions of Local Authority and Government CO2 emissions targets.
Response:						Accepted; any new theatre development would be scrutinised for energy efficient features (Appendix 5).
Proposed Change						No change
	34	006				Throughout: Headers appear to spell efficiency incorrectly, ie with a double "i."
Response:						Noted.
Proposed Change						Amend headers to pages.
	70	017				The document would read more easily if it was structured according to the energy hierarchy in diagram 1 (p.8) with the first section about energy efficiency, the second about renewable applications and the third about sustainable construction.
Response:						Noted; this sounds sensible but this is virtually the present order.
Proposed Change						No change.
	70	018				The document includes sections on water conservation and waste minimisation as well as energy efficiency. Therefore it might be more appropriate to call it a 'Sustainable Construction' or 'Sustainable Design' SPD.
Response:						The title 'Sustainable Construction' is quite narrow and the document is more than this. The document is concerned with 'sustainable design' but it is felt that energy efficiency is a wider term to cover the remit.
Proposed Change						No change.
	38	001				We are pleased that the SPD highlights the special considerations which apply to listed buildings and conservation areas when planning for energy efficiency. The SPD could usefully use the term "heritage assets" and their setting which would cover both designated and non-designated heritage assets, PPS5 policies HE7, HE8, HE9 and HE10 would apply.
Response:						Agree; PPS5 was not published when the SPD was written. The policies quoted are general ones that would be picked up in the policies of a Core Strategy and/or General Development Management DPD.
Proposed Change						Insert reference to heritage assets in para. 3.13, a definition of historic assets in the Glossary and a reference to PPS5 Planning for the Historic Environment in Appendix 2 Background Documents. Insert references to the HELM website in Appendix 8

Respondent	RepNo	Support	Chapt	Page	Para	Details
	68	020				It should be noted that Planning Policy Statement 1 states that “any policy relating to local requirements for decentralised energy supply to new development or for sustainable buildings should be set out in a DPD, not a supplementary planning document”. It should therefore be acknowledged that the SPD does not create new policy; rather an interpretation of existing Local Plan Policies CP8 and CP9.
Response:						Noted; this is stated in the Introduction paragraph 1.2. The document is intended to present options and to promote.
Proposed Change						No change.
		039				
Response:						
Proposed Change						
	68	022				The document does not make reference to the Cumbria Climate Change Commitment (2010) which the City Council has signed up to. This commits the City Council to reducing its own carbon emissions from their operations by 25%, but also in the context of LDF documents which includes SPDs, requires policies and targets that contribute to NI 186 for CO2 reduction in Cumbria from all development and supporting transport and energy infrastructure.
Response:						Reference is made to the commitment to the Nottingham Declaration (2007) which contains a climate change action commitment. There is a reference to NI 186 in para. 2.7
Proposed Change						Insert reference to the Cumbria Climate Change Action Plan in para. 2.7. which has led to the Commitment referred to in para. 2.7.
	68	023				The SPD does not set requirements for developments over a certain size/ threshold. It is considered that it would be useful, as is stated in the Local Plan paragraph 3.45 if the SPD did set requirements for developments over a certain size to achieve a specified proportion of their likely energy needs from renewable energy sources. This would assist in achieving the targets listed on page 7 of the SPD and towards achieving the Cumbria Climate Change Commitment (2010) and again allow the SPD to be a useful tool for Development Management officers.
Response:						Agree that requirements would be useful for developers and consideration is given to this suggestion as stated in para. 3.45.
Proposed Change						Add in a new design requirement for major developments to incorporate a minimum of 10% of predicted energy requirements from decetralised and renewable or low carbon sources.
	68	024				The SPD will need to be a flexible document and evolve as new legislation and requirements are produced. Once there is an adopted Core Strategy in place the SPD will need to be revised to support and give greater guidance to policies in the Core Strategy which specifically relate to energy efficiency.
Response:						Noted. This is a problem with such a rapidly evolving subject.
Proposed Change						No change at present. (A review of SPDs will be undertaken once any new policies are formulated through the LDF)

Respondent	RepNo	Support	Chapt	Page	Para	Details
68	029					It is considered that where the document makes reference to BREEAM standards it should be stated that developments will be as a minimum encouraged to be 'excellent' it is at this level that renewable energy is included in the criteria. It is also considered that it would be useful if the SPD made reference to the Building for Life criteria. The Building for Life criteria encourages sustainable development which in turn has a positive impact upon energy efficiency.
Response:		The SPD states that for large developments proposed schemes should meet the BREEAM ratings of 'very good' or 'excellent'. The suggested rating range suggested on Page 28 should be expanded to include 'outstanding' also, for completeness. It is felt that the inclusion of Building for Life criteria may confuse the reader; the BfL assessment is better used for large neighbourhood schemes. Some elements of BfL assessment criteria are included in the Appendix 5 Checklist for new applications.				
Proposed Change		Page 28 second line after 'excellent' add 'or outstanding'.				
68	019	S				On the whole the document is welcomed and support is given to the encouragement of energy efficiency. It is considered that the SPD will have a positive effect on reducing Carlisle's impact upon climate change. The SPD provides helpful guidance and advice on different types of design and applications which can make developments more energy efficient, and also in what situation, which type of design and application would be most suitable.
Response:		Noted and welcomed.				
Proposed Change		None.				
54	032	S	02	7 & 8		The Background section is well written, clearly setting out in non-emotive language the issues that need to be faced, the targets to be met and the specific need to address energy issues in respect of residential and commercial developments. The text is supported.
Response:		Support is welcomed.				
Proposed Change		No change.				

Respondent	RepNo	Support	Chapt	Page	Para	Details
34	007		02	07	2.3 - 2.4	<p>Incorrect reference to 60% reduction in emissions, sentence largely duplicated by 2.4 which confusingly refers to both “greenhouse gas emission reductions” and then “carbon dioxide emission reductions”. My suggested alternatives:</p> <p>2.3 The Climate Change Act 2008 set legally binding targets for greenhouse gas emissions of at least 34% by 2020 and 80% by 2050 against the 1990 baseline totals. Between 2003 and 2007 greenhouse gas emissions were falling at less than one per cent annually. Furthermore, reductions in emissions over the last two years are more likely to the recession rather than any real sign of progress in the rate of emission reduction.</p> <p>2.4 It is now well acknowledged that about half of the UK’s greenhouse gas emissions come from buildings, from constructing them in the first place, and from generating the energy which is used in buildings. The Government’s Committee on Climate Change has called for a 35% reduction in emissions from homes by 2022 compared with 2007.</p>
Response:		Agree that the clarity could be improved.				
Proposed Change		As suggested above. (para. 2.3) Delete last sentence of para. 2.4 to clarify and to avoid duplication.				
54	031		03			<p>Generally all good advice, but NB some duplication between para 3.6 and the fourth of the bullet points under 'Design Considerations' on page 10.</p> <p>Para 3.4: The statement in the first bullet point is a very important one and supported accordingly. The inefficiency of uncapped cavities was a significant finding of the research work associated with the Trust's major residential development in partnership with two Volume House Builders at Stamford Brook in Greater Manchester (a copy of the outcomes report 'Volume' is provided separately for information).</p>
Response:		<p>The box of bullet points is intended as a summary of points raised in the text.</p> <p>Welcome the support.</p>				
Proposed Change		No change.				
	025		03	12		<p>Support is given to the section on Wind Energy and the reference to the Cumbria Wind Energy SPD on page 12. However, it is considered that there is an opportunity for the SPD to promote and advise on community scale micro generation, e.g. wind turbines in schools, factory and office complexes.</p>
Response:		Agree that in theory this is desirable; the SPD does promote the various types of technologies, but the scales of applications vary so much that inevitably an SPD contains general advice. The Energy Saving Trust provides practical and technical advice, as do installers of such technologies.				
Proposed Change		No change.				
	015		03	20		<p>Figure 2: Maximum Transport Distances for Reclaimed Materials - It is not clear whether the distances quoted include the return journey.</p>
Response:		When materials are to be reclaimed they will only go to the point of re-use; therefore the distances are one-way journeys.				
Proposed Change		Insert under Figure 2 title, Page 20, 'one-way'				

Respondent	RepNo	Support	Chapt	Page	Para	Details
68	027		03	25		Design Considerations - states that 'the preparation of Work Travel Plans is encouraged by major employers'. It is considered that 'encouragement' alone will not lead to travel plans being implemented. The SPD should state that where necessary for new development there needs to be a planning condition to ensure travel plans are implemented. However, it is still important that existing major employers are encouraged to implement Travel Plans. Guidance on Travel Plans is listed in Policies T30 Transport Assessments and T31 Travel Plans of the Cumbria and Lake District Joint Structure Plan 2001-2016.
Response:		Agree that Travel Plans need to be implemented. The Planning Authority can impose planning conditions on major applications to require the submission of Travel Plans for approval. A separate condition can require a Section 106 Agreement for monies to be paid (usually to the County Council as Highway Authority) for the annual monitoring of the impact of the Plan in the short to medium term, often for five years. The problem is that employees need incentives to change their travel habits, though employers have been known to negotiate weekly travel tickets.				
Proposed Change		Add a reference to the requirement for Travel Plans for major developments onto Design considerations page 25.				
70	011		03	09	3.1	Should overhangs be discouraged given that they are likely to cast a permanent shadow preventing solar gain?
Response:		There has to be a balance between the need for shade and shelter, and the need to experience solar gain. The point is that overshadowing of buildings and ground around should be minimised.				
Proposed Change		No change.				
38	004		03	09	3.1 - 3.2	The SPD acknowledges listed buildings and conservation areas and it would be appropriate in this section (3.1, 3.2) to refer to the wider historic environment, local distinctiveness and sense of place and include the need for understanding of local character and context in the design process.
Response:		Agree; see previous response no. 003.				
Proposed Change		Insert new para. after 3.2				
54	033		03	12	3.12	The comment that "wind energy is currently the most developed of a number of renewable energy technologies" is true in terms of large scale turbine design for use in wind farms, including offshore arrays. In the context of this SPD and its emphasis on the energy efficiency of residential and commercial buildings it is probably less true - there have been issues with the effectiveness of small wind turbines on houses having regard, for example, to micro-climate issues. Whilst this is a technology that has potential at the local level, and indeed arguably should be encouraged, its effectiveness compared with solar and heat pump technologies at a small scale is not clearly demonstrated.
Response:		Agree with this view but the technology still should be promoted. The statement at the start of the 'Wind Energy' section could be qualified.				
Proposed Change		Add to the first sentence in para. 3.12 at the end: 'particularly when applied on a larger scale'.				

Respondent	RepNo	Support	Chapt	Page	Para	Details
54	034		03	13	3.13	The advice on heritage considerations might usefully contain a link/reference to English Heritage's work on Climate Change and the Historic Environment (2008).
Response:		Accepted				
Proposed Change		Add a reference to Appendix 7 after 'Changeworks' : 'Climate Change and the Historic Environment, English Heritage, 2008				
70	014		03	14	3.14	This should be titled 'Ground, water and air source heating and cooling'. Air Source Heat Pumps are becoming increasingly common so further explanation and a local case study would be useful on this application.
Response:		Noted.				
Proposed Change		Amend title preceding para. 3.14 and add a reference to the scheme at Talkin Tarn.				
	026		03	15	3.17	States that it is preferable for fuel for Biomass heating to be sourced within a 15 mile radius. It is considered that this figure is difficult to justify in the context of acceptable transport distances for recycled materials. This can be seen when compared to maximum transport distances for reclaimed materials in Figure 2, which all greatly exceed 15 miles.
Response:		Noted; this distance is only advisory.				
Proposed Change		No change.				
70	012		03	09	3.2	Linear streets may create opportunities for street scale wind turbines providing some visual interest as well as energy.
Response:		The principle is acknowledged but street-scale wind turbines may not be practical as the proximity of nearby buildings could well inhibit the functioning of turbine blades. This point is noted in para. 3.12. Agree that they could provide visual interest. Any turbines in such a situation would need to be located in positions that are well clear of buildings.				
Proposed Change		No change				

Respondent	RepNo	Support	Chapt	Page	Para	Details
54	035		03	20 - 21	3.24 - 3.2	<p>Whilst the Energy Hierarchy appears early on in the document this is the first more detailed consideration of reducing energy demand through energy conservation works - it is considered that advice on insulation in particular should be included at the start of the document. It is also the case that there are other more innovative construction methods possible, as exemplified by the National Trust's 'straw bale building' at St Catherine's near Windermere.</p> <p>www.strawfootprint.org</p> <p>www.nationaltrust.org.uk/main/w-global/w-localtoyou/w-northwest/w-news-projects-st_catherines_footprint.htm</p>
Response:		Advice on insulation is referenced later in the document because the document goes from the general to the particular. There are reservations about promoting straw bale building; there are difficulties in designing for the bales in high winds, they have a susceptibility to rot, there is a danger from flammability (the St Catherine's building has had a chimney fire in November 2010) and the bales have a high space requirement.				
Proposed Change		No action.				
54	036	S	03	22 - 22	3.27 - 3.3	The attention given to water issues, especially minimisation of use, recycling and utilising SUDs systems is supported. A number of these techniques have been used by the Trust, including as part of the Stamford Brook development (see volume document also sent).
Response:		Noted.				
Proposed Change		No change.				
70	016		03	22	3.34	The paragraph on hydropower would be more suitable in the section on applications. Reference should also be made to the biodiversity impact implications of hydro power and the statutory requirements of consulting with the Environment Agency and Natural England.
Response:		Agree that the para. is out of sequence.				
Proposed Change		Move section on Hydropower to end of 3.20				
54	037	S	03	23 - 24	3.35 - 3.4	The energy issues associated with waste are significant and it is therefore appropriate to incorporate this section on waste into the SPD. The specific comments on recycling waste are particularly appropriate.
Response:		Noted.				
Proposed Change		No change.				
54	038	S	03	25 - 26	3.35 - 3.4	As with waste issues it is similarly the case that the impact of transport on energy requirements, and therefore potentially on emissions, is a significant consideration. The approach to the location of new development and the promotion of non-car modes of transport is appropriate.
Response:		Noted.				
Proposed Change		No change.				

Respondent	RepNo	Support	Chapt	Page	Para	Details
34	008		03	25	3.42	<p>The scheme has monies from the Lottery Fund (£975,000) and is due to be completed by 2013. It will provide safer routes for cyclists and improve health by encouraging physical activity and by giving easier access to green areas.</p> <p>Comment: I would like to point out that it's not just about providing safer routes for a "user group" but sustainable transport opportunities for everyone. My alternative therefore for the second sentence: It will provide safer routes for walking and cycling and improve health by encouraging physical activity, and by providing improved access to green spaces.</p>
Response:		Accepted.				
Proposed Change		Amend the relevant sentence of para. 3.42.				
68	028		03	25	3.42	<p>Explains that the Sustrans Connect2 cycle project (2008) for Carlisle incorporates two major schemes, a new crossing of the River Eden and a link from Currock to the Caldew Riverside Path. The scheme has now been revised and does not include a new crossing of the River Eden. This is because the costs of the scheme have risen to £5m, which in the present financial climate is not viable for the City Council to contribute to. The scheme has now been scaled down to a cost of £3.19m. It is considered that the most up to date position should be detailed in the SPD.</p>
Response:		Noted that the scheme has been revised. The most up to date position (2008 scheme) was described when the document was under preparation.				
Proposed Change		Amend by adding new para. 3.43 Page 25 to state the latest position.				
34	009		04	27	4.1	<p>First line should read:</p> <p>The Climate Change Act set targets for reducing greenhouse gas emissions: 34% by 2020, rising to 80% by 2050.</p>
Response:		Noted.				
Proposed Change		Amend para. 4.1 first sentence.				
68	030		Appen dix 1	29		<p>Refers to policy CP8 on Renewable Energy, which refers to 9 criteria which proposed developments have to satisfy. It would be useful if the criteria were also listed in the appendix.</p>
Response:		The SPD aims to be a positive document promoting energy efficiency in new developments. It is felt that if the lengthy criteria are listed they could be a constraint on consideration of renewable energy. The primary source of the Policy is quoted including its Page in the document.				
Proposed Change		No change.				

Respondent	RepNo	Support	Chapt	Page	Para	Details
34	010		Appendix 9	43		Carbon Footprint, in my experience it is specifically about carbon dioxide, not greenhouse gases generally. My alternative therefore: Carbon Footprint – A measure of the amount of carbon dioxide that individuals, businesses and organisations release into the atmosphere as a result of their actions over a given period of time. This includes the carbon dioxide released whilst manufacturing and transporting the food and goods consumed, to demolish, construct heat, power buildings and appliances.
Response:		Agree.				
Proposed Change		Amend final sentence of definition in Appendix 9.				
70	013		Appendix 9	45		Glossary entry needed for the term 'thermal chimney' (referred to Page 10 para 3.7)
Response:		Agree.				
Proposed Change		Add 'thermal chimney' definition to the Glossary.				