



Application by Morecambe Offshore Wind Limited for Morecambe Offshore Windfarm Generation Assets The Examining Authority's written questions and requests for information (ExQ1) Issued on 18 December 2024

The following table sets out the Examining Authority's (ExA) written questions and requests for information - ExQ1. If necessary, the examination timetable enables the ExA to issue a further round of written questions in due course. If this is done, the further round of questions will be referred to as ExQ2.

Questions are set out using an issues-based framework derived from the Initial Assessment of Principal Issues provided as Appendix C to the [Rule 6 letter](#) of 23 September 2024. Questions have been added to the framework of issues set out there as they have arisen from representations and to address the assessment of the application against relevant policies.

Column 2 of the table indicates which Interested Parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference number which starts with 1 (indicating that it is from ExQ1) and then has an issue code and a question number. For example, the first question on General and Cross-Topic issues is identified as ExQ1GEN1. When you are answering a question, please start your answer by quoting the unique reference number.

If you are responding to a small number of questions, answers in a letter will suffice. If you are answering a larger number of questions, it will assist the ExA if you use a table based on this one to set out your responses. An editable version of this table in Microsoft Word is available on request from the case team: please contact MorecambeOffshoreWindProject@planninginspectorate.gov.uk and include 'Morecambe Offshore Windfarm Generation Assets ExQ1' in the subject line of your email.

Due to the period of time between Deadline 2 and the issuing of these questions, it has not been possible for the ExA to fully evaluate all the information submitted at that deadline. It is therefore possible that submissions may have already provided the information requested. If that is the case, then there is no need for a party to re-submit the information. Therefore, in response to the question, please signpost where the information can be found by specific reference within a document identified through its [Examination Library](#) reference.

Responses are due by Deadline 3: Wednesday 22 January 2025.



Abbreviations used:

Abbreviation Description	
AltMoC	Alternative Means of Compliance
CAA	Civil Aviation Authority
CEA	Cumulative Effects Assessment
DAERA	Department of Agriculture, Environment and Rural Affairs (Northern Ireland)
Defra	Department for the Environment, Food and Rural Affairs
D	Deadline (eg D1 - Deadline 1)
(d)DCO	(Draft) Development Consent Order
DIO	Defence Infrastructure Organisation
(d)DML	(Draft) Deemed Marine Licence
EIA	Environmental Impact Assessment

Abbreviation Description	
HAT	Highest Astronomical Tide
HE	Historic England
HRA	Habitats Regulations Assessment
IFP	Instrument Flight Procedures
IoM	Isle of Man
IoM TSC	Isle of Man Territorial Seas Committee
INNS	Invasive Non-Native Species
IP	Interested Party
IPCoD	Interim Population Consequences of Disturbance
IPMP	In Principle Monitoring Plan
JNCC	Joint Nature Conservation Committee



EMF	Electromagnetic Field
(o)EMP	(Outline) Environmental Management Plan
ENG	Environmental Net Gain
ES	Environmental Statement
ExA	Examining Authority
(o)FLCP	(Outline) Fisheries Liaison and Co-Existence Plan
FOCI	Features of Conservation Interest
GLVIA3	Guidelines for Landscape and Visual Impact Assessment (3 rd Edition)

Abbreviation Description	
MCA	Maritime and Coastguard Agency

KAMT	Kenneth Allsop Memorial Trust
km	Kilometre
LFA17	Low Flying Area 17
LURA	Levelling Up and Regeneration Act 2023
m	Metre
m²	Square metre
m³	Cubic metre
M&MTA	Morgan and Morecambe Offshore Wind Farms Transmission Assets

Abbreviation Description	
PA2008	Planning Act 2008



MCA38	Marine Character Area 38: Irish Sea South (England)
(d)MMMP	(Draft) Marine Mammal Mitigation Protocol
MMO	Marine Management Organisation
MoD	Ministry of Defence
MSA	Minimum Sector Altitudes
NE	Natural England
NFFO	National Federation of Fisherman's Organisations
nm	nautical mile
NPS	National Policy Statement
NPS EN-1	Overarching NPS for Energy

PTS	Permanent Threshold Shift
PSR	Primary Surveillance Radar
Req	Requirement
RIAA	Report to Inform Appropriate Assessment
RR	Relevant Representation
RSPB	Royal Society for the Protection of Birds
SSSI	Site of Special Scientific Interest
SoCG	Statement of Common Ground
SLVIA	Seascape Landscape Visual Impact Assessment
SNCB	Statutory Nature Conservation Body
SoS	Secretary of State



NPS EN-3	NPS for Renewable Energy Infrastructure
NPS EN-5	NPS for Electricity Networks Infrastructure
NRW	Natural Resources Wales
OCMS	Offshore Construction Method Statement
(o)PEMP	(Outline) Project Environmental Management Plan
OREI	Offshore Renewable Energy Infrastructure
OSP	Offshore Substation Platform
OWF	Offshore Wind Farm

SPA	Special Protection Area
TTS	Temporary Threshold Shift
UK	United Kingdom
UXO	Unexploded Ordnance
VMC	Visual Meteorological Conditions
(o)VTMP	(Outline) Vessel Traffic Management Plan
WR	Written Representation
WTG	Wind Turbine Generator

The Examination Library

References in these questions set out in square brackets (eg [\[APP-010\]](#)) are to documents catalogued in the Examination Library. The Examination Library can be obtained from the following link:



[EN010121-000408-Morecambe Offshore Wind Farm - Examination Library.pdf](#) It

will be updated as the examination progresses.

Citation of Questions

Questions in this table should be cited as follows:

Question reference: issue reference: question number, eg ExQ1GEN1 – refers to question 1 in this table.



Index

1. General and Cross-topic Questions (GEN)	6
General	6
Design, parameters and other details of the Proposed Development	6
Environmental Statement (General)	9
Need and Assessment	11
2. Biodiversity, Ecology and Marine Processes (BEM)	13
General	13
Marine geology, oceanography and physical processes	14
Marine Sediment and Water Quality	18
Benthic ecology	20
Fish and shellfish ecology	21
Marine mammals	23
Offshore Ornithology	27
3. Civil and Military Aviation and Radar (CAR)	30
Clarifications	30
Effects on individual sites	33
Emergency Response Co-operation	41
4. Climate Change (CC)	42

Assessment	42
------------------	----

5. Commercial Fisheries (CF)	50
44 6. Cultural Heritage (including Marine Archaeology) (CH)	50
Clarifications	50
Effects on assets	51
7. Draft Development Consent Order [REP2-002] (DCO)	54
Article 7 – Benefit of Order	54
Schedule 2 - Requirements	54
Schedule 3 – Protective Provisions	55
Schedule 6 – Deemed Marine Licence	55
Schedule 8 – Documents to be Certified	56
8. Habitats Regulations Assessment (HRA)	66
57 9. Other offshore infrastructure (OOI)	66
Wake effects	66
10. Seascape, Landscape and Visual (SLV)	70
Clarifications	70
Lighting Effects	71



Planning Inspectorate

Array layout	
71	
Landscape effects	
72	
Visual effects	
73	
11. Shipping and Navigation (SN)	73
Clarifications	
73	
Effects on shipping and navigation	
75	
12. Socio-Economics, Tourism and Recreation (SETR)	76
Retail storage on IoM	
76	
Community benefits	
77	
13. Traffic and Transport (TT)	77
Port Access	
77	

ExQ1: Wednesday 18 December 2024

Responses due by Deadline 3: Wednesday 22 January 2025

ExQ1	Question to:	Question:
3. Civil and Military Aviation and Radar (CAR)		

ExQ1	Question to:	Question:
1CAR15.	The Applicant NATS CAA Isle of Man Ronaldsway Airport IoM TSC	<p>Isle of Man Airport - Ronaldsway Airport Primary Surveillance Radar (PSR)</p> <p>Paragraph 16.157 of ES Chapter 16 [REP1-036] indicates that Ronaldsway Airport has concerns about the number of offshore wind projects proposed in the Irish Sea and that there may be a technical impact with the processing capacity of the PSR. Paragraph 16.219 states that engagement is continuing to further understand any potential radar issues and mitigate these concerns.</p> <p>NATS have not commented on impacts to the Isle of Man Ronaldsway Airport in its RR [RR-060] and Ronaldsway Airport did not register a RR and so are not an IP. However, the RR from the IoM TSC [RR-031] does request continued engagement in relation to potential impacts on air travel and any mitigation and this is referenced within the draft SoCG with the IoM TSC submitted at Deadline 1 (item TSC 22 in REP1-066).</p> <p><u>To All Parties:</u></p> <p>a) Please explain if and how the Isle of Man (IoM) Ronaldsway Airport regulations on air traffic safety relate to relevant UK regulations and guidance?</p> <p><u>To IoM TSC:</u></p> <p>b) Noting paragraph 14 of the draft SoCG submitted at D1 [REP1-066], can the IoM TSC confirm it is representing the views of the airport at this Examination and, if so, can the SoCG be amended to make this clear; and does it wish to make any further submissions in relation to the assessment or mitigation of potential interference with the airports PSR?</p> <p><u>To the Applicant</u></p> <p>c) Can the Applicant provide an update on discussions with the airport about potential concerns on radar processing capacity given the number of offshore projects and in particular whether any mitigation to address this has been agreed? If so, how is this to be secured?</p> <p>TSC Response</p> <p>a) <i>Regulations relating to aviation safety and air traffic services are set by the Isle of Man Civil Aviation Administration (IOMCAA) , which is a separate entity to Isle of Man (Ronaldsway) Airport. Isle of Man Airport is</i></p>

ExQ1: Wednesday 18 December 2024

Responses due by Deadline 3: Wednesday 22 January 2025

		<p><i>certified under the Civil Aviation (Aerodromes) Order 2022. Isle of Man Airport Air Traffic Control is approved under the Civil Aviation (Air Traffic Services) Order 2020 and holds ATS equipment approvals, also issued under that Order.</i></p> <p><i>IOMCAA policy on renewable energy installations, including wind farms, is set out in publication CP1: Renewable Energy. The following UK CAA policies have been adopted as outlined in CP1: CAP764, CAP1616, CAP1618, CAP670 together with all UK CAA policy statements.</i></p> <p><i>b) The Territorial Sea Committee has been coordinating responses from the various IoM Government departments and bodies to give a single point of contact and to ensure consistency of response. The Isle of Man Airport is fully involved in this and, where relevant, will provide input as part of the TSC engagement. However, on technical/commercial matters the Airport, will, at times, have direct contact with the applicant. The inclusion of the Airport in the TSC response can be clarified in the next update to the SoCG.</i></p>
--	--	--

ExQ1: Wednesday 18 December 2024

Responses due by Deadline 3: Wednesday 22 January 2025

1CAR18.	<p>The Applicant BAE Systems (Operations) Limited BAE Systems Marine Ltd Blackpool Airport Ronaldsway Airport</p>	<p>Very High Frequency (VHF) and Direction Finding (DF) Communications</p> <p>In the draft SoCG submitted at Deadline 1 (BA 14, REP1-070) it is noted that Blackpool Airport has identified impacts to VHF radio and DF communications and stated that an assessment is required and needs to take into account other adjacent offshore wind farm projects. No such assessment is currently contained within the application documents, having previously been agreed to be scoped out.</p> <p><u>To Blackpool Airport/ BAE Systems:</u></p> <p>a) Please can Blackpool Airport/ BAE Systems explain why the concerns about potential impacts to VHF and DF communications were not identified earlier or whether something has changed since the Application was submitted which gives rise to these concerns?</p> <p><u>To BAE Systems (Operations) Limited, BAE Systems Marine Ltd and Ronaldsway Airport</u></p> <p>b) Do any of the operators of other aerodromes/ airports have any comments or concerns in relation to impacts on VHF and DF communications? If so please can summarise these concerns.</p> <p><i>TSC Reponse</i></p> <p><i>IOM Airport is in the process of commissioning a report into potential VHF impact which is a concern. Recent reports into other proposed windfarms have highlighted a potential impact up to 8000ft</i></p>
---------	---	--

ExQ1: Wednesday 18 December 2024

Responses due by Deadline 3: Wednesday 22 January 2025

ExQ1 | Question to: | Question:

5. Commercial Fisheries (CF)

1CF3.	The Applicant MMO NFFO IoM TSC	<p>In Principle Monitoring Plan - Landings Data and Monitoring</p> <p>Paragraph 13.302 of ES Chapter 13 [APP-050] states that the IPMP includes for the monitoring of commercial fisheries data pre, during and post construction. Paragraph 39 of the IPMP states that this is likely to be managed outwith of the IPMP. Table 2.5 of the IPMP [APP-148] states that monitoring would be carried out for a minimum period of 5 years and does not include monitoring during or following decommissioning. Assuming an approximate construction period of 2.5 years, it is assumed that pre and post construction monitoring would therefore equate to approximately 1.25 years each.</p> <p>Please also see ExQ1GEN11Error! Reference source not found..</p> <p><u>To the Applicant:</u></p> <p>a) Can the Applicant explain why a commitment to monitoring landings data is proposed to sit outwith the IPMP and, if so, how would this be secured?</p> <p>b) Rather than sit outwith of the IPMP, could the IPMP and/ or the oFLCP be amended to secure this and if not, why not?</p> <p>c) Can the Applicant explain why monitoring of landings data is not proposed during or post decommissioning given the potential impact of activities during decommissioning have been assessed as being the same as those during construction? To address this can the IPMP be amended to make clear monitoring would be carried out during and post decommissioning and for how long?</p> <p><u>Other IPs:</u></p> <p>d) Do any other IPs have any comments or views on how the commitment to monitoring should be secured?</p> <p>TSC Response <i>Monitoring needs to be secured in either the IPMP or FLCP. This has been done for similar projects in the region, which also include for annual reviews of the monitoring with stakeholders.</i></p> <p>e) Is monitoring on landing data sufficient?</p> <p>TSC Response <i>Monitoring should include evaluation of VMS / I-VMS data in addition to landings data.</i></p>
-------	---	--

ExQ1: Wednesday 18 December 2024**Responses due by Deadline 3: Wednesday 22 January 2025**

		<p>f) Could NE confirm whether 1.25 years of data would be sufficient to evaluate the effect of the construction and operation of the proposed development on the fisheries resources at or near the site, or whether a longer post construction monitoring period is necessary.</p> <p>TSC Response <i>1.25 years post construction monitoring would be completely inadequate to evaluate the effects on fisheries. We would suggest post construction monitoring should be a minimum of at least 5 years which would be consistent with other projects in the region.</i></p> <p>g) Should monitoring be extended to include during and post decommissioning activities and if so, can other IPs explain with reasons how long it is considered such monitoring would be required following completion of the works?</p> <p>TSC Response <i>Monitoring should cover during and post decommissioning and we would suggest that it should mirror that carried out for construction. It is acknowledged that decommissioning plans are not contained within the application but it should be noted that survey/monitoring post decommissioning to determine seabed/biological impacts would also be important in evaluating effects on commercial fisheries.</i></p>
--	--	---

ExQ1	Question to:	Question:
1CF4.	IoM TSC	<p>Applicant's Response to Relevant Representation</p> <p>In its [RR-031] the IoM TSC has stated that "there remains some lack of consistency between Chapter 13 Environmental Statement and the baseline technical report (Appendix 13.1). This should be considered and corrected both for ensuing accuracy of the record, and also to ensure that the conclusions of the EIA are accurate". The Applicant's response to RR-031-07 [PD1-011] states that it does not consider there is a lack of consistency.</p> <p>Please can the IoM TSC identify and explain the inconsistencies between ES Chapter 13 [APP-050] and the Appendix 13.1 [APP-072] that it is referring to?</p> <p>TSC Response</p> <ul style="list-style-type: none">Comments have previously been provided to applicant in relation to the ES and Tech report, most of which have been addressed in the latest version; Volume 5 Appendix 13.1 Commercial Fisheries Technical Report (Tracked) PINS Document Reference: 5.2.13.1.1, APFP Regulation: 5(2)(a) Rev 02.

ExQ1: Wednesday 18 December 2024

Responses due by Deadline 3: Wednesday 22 January 2025

		<p><i>Acknowledging that amendments have been made, which have improved the document, there do remain some minor errors and inconsistencies within and between the documents, as previously outlined.</i></p> <ul style="list-style-type: none"><i>The difference in scope and number of comments between the Technical report and Chapter 13 suggested that the matters were not presented the same in both documents- which may imply inconsistency. Similarly, errors in the Technical Report may result in incorrect conclusions in the receptor chapter, but practically only the applicant can know this having first addressed the comments on the Technical Report.</i> <p>• Examples, which have not apparently been corrected, include:</p> <p><i>Page 23: Lobster: ‘Primary management is by the technical measure of an MLS of 87 mm (Council Regulation 850/98).’ – this is not the case for the Isle of Man, where a higher MLS of 90 mm applies.</i></p> <p><i>Page 23: Crab: ‘Primary management is by the technical measure of a MLS of 140 mm carapace width inside 6 NM and 130 mm outside 6 NM (Council Regulation 850/98).’ this is not the case for the Isle of Man, where a 140 mm MLS applies throughout the territorial sea (0-12 nm).</i></p> <p><i>Pg 60: MMEA section – there is no fishery for European flat oyster in Manx waters.</i></p> <p><i>Pg 66: MNRs Section – ‘The MNRs are managed through a combination of input and output controls, including fishing curfews, closed areas, and individual and total TAC quotas’. Remove this section as the statement is applicable to Manx fisheries in general and not specifically to MNRs. It implies that MNRs have their own fisheries management, which typically is not the case; rather it is specific restrictions rather than a management regime.</i></p> <p><i>Additional correction:</i></p> <p>5.5.1 Isle of Man fisheries</p> <ul style="list-style-type: none"><i>Jurisdiction and International Cooperation: The Isle of Man's territorial sea jurisdiction, extended under the Territorial Sea Act, necessitates cross-jurisdictional cooperation and adherence to UK's international obligations through the Fisheries Management Agreement.</i> <p><i>FMA is now void, and has been replaced by the IoM:UK Fisheries MoU</i> https://www.gov.im/about-the-government/departments/environment-food-and-agriculture/environment-directorate/fisheries/sea-fisheries/iom-uk-fisheries-management-memorandum-of-understanding-mou/</p> <ul style="list-style-type: none"><i>Co-management and Strategic Approach: DEFA aims to work in partnership with stakeholders, adopting a co-management approach to fisheries management and implementing a strategic Future Fisheries Strategy.</i>
--	--	---

ExQ1: Wednesday 18 December 2024

Responses due by Deadline 3: Wednesday 22 January 2025

		<p><i>The Isle of Man has also produced a Fisheries Statement to complement the UK's Joint Fisheries statement. This is to large extent a replacement of the Fisheries Strategy.</i></p> <p>https://www.gov.im/about-the-government/departments/environment-food-and-agriculture/environment-directorate/fisheries/sea-fisheries/fisheries-statement/</p>
1CF5.	IoM TSC	<p>Applicant's Response to Relevant Representation</p> <p>In its RR [RR-031] the IoM TSC states that it retains some concerns about the scope (number of years and period) and type of fishing activity data used to characterise the baseline of regional fisheries. It is added that <i>"Factors such as Covid, Brexit and cyclical patterns of particular species are acknowledged, but apparently not consistently or fully considered"</i>.</p> <p>Please can the IOM TSC explain what is meant by <i>"apparently not consistently or fully considered"</i>? Can the IOM TSC give examples or reasoning for this statement?</p> <p>TSC Response</p> <ul style="list-style-type: none"><i>The original 5-6 reference period to inform the baselines used in the report is generally considered to be too short to take account for longer life/environmental cycles in particular species (the document notes 7-10 year cycles (3.1.1), so 6 years is isn't sufficient by the applicant's own acknowledgment). Acknowledging the time periods involved in the documents, but using a shorted one to establish related fishing activity is considered to be an example of inconsistent and/or partial consideration.</i><i>Similarly, when using a 6 year reference period, particularly 2016-2022, within which are significantly atypical years due to Brexit and Covid effects on the fishing industry, then it is not reasonable to establish a meaningful baseline on that basis.</i><i>Noting that the reference period has now been changed to a 5-12 year period, then the issue can be considered to be resolved.</i>

ExQ1: Wednesday 18 December 2024

Responses due by Deadline 3: Wednesday 22 January 2025

ExQ1	Question to:	Question:
7. Draft Development Consent Order [REP2-002] (DCO)		
Article 7 – Benefit of Order		
Schedule 6 – Deemed Marine Licence		
1DCO9.	The Applicant NFFO The Traditional and Sustainable Commercial Fishing Association IoM TSC	<p>Schedule 6, Condition 9(k) - Fisheries Liaison and Co-existence Plan (FLCP) To the Applicant:</p> <p>a) The Applicant's response to the NFFO Relevant Representation ([PD1-011], RR-059-02) states that the FLCP is secured in Schedule 6 Condition 9(1)(k), which would be approved by the MMO with consultation with the fishing industry. However, the pretext within Condition 9(1) only references approval by the MMO in consultation with the relevant statutory nature conservation body, Trinity House and the MCA.</p> <p>Can the Applicant amend the drafting so as to include reference to representatives of the fishing industry? If not, at what stage and how would the fishing industry be consulted on the final FLCP as indicated? How would this be secured?</p> <p><u>Other IPs:</u></p> <p>b) Do the parties have any comments on the drafting of Condition 9(1)(k) or the scope and content of the oFLCP at this stage?</p> <p>TSC Response</p> <p>b) <i>The TSC would consider that it is essential that the fishing industry are fully consulted on the FLCP prior to approval.</i></p>

ExQ1: Wednesday 18 December 2024

Responses due by Deadline 3: Wednesday 22 January 2025

8. Habitats Regulations Assessment (HRA)

1HRA31.	IoM TSC The Applicant	<p>Isle of Man proposed Ramsar sites</p> <p>The RIAA [REP1-012] summarises comments from the IoM Government (Table 8.2, p194) including reference to “<i>potential further Ramsar sites</i>” on the IoM. The text includes a broken hyperlink to the UK Overseas Territories Conservation website.</p> <p>Paragraph 5.4.5 of the NPS EN-1 requires that proposed Ramsar sites should be given the same protection as designated sites and assessed as part of a HRA, where relevant.</p> <p>a) Can the IoM TSC confirm whether the potential further Ramsar sites meet the NPS definition of being ‘proposed Ramsar’ sites and therefore require assessment?</p> <p>b) Where the IoM TSC confirms that the potential Ramsar site(s) meet(s) the criteria within the NPS, the Applicant should provide information on the likely effect of the Proposed Development on those sites and their qualifying features. The Applicant may wish to liaise with IoM Government to expedite the provision of information.</p> <p>In responding the Applicant should include specific reference to the following sites - Central Valley Curragh, Dalby Peatlands, Gob ny Rona, Maughold Heead and Port Cornaa, Southern Coasts and Calf of Man and The Eyres.</p> <p>TSC Response</p> <p><i>The TSC are not aware of the UK definition of ‘proposed Ramsar’ sites, with respect to NPS EN-1, this being outside of our jurisdiction, and finding no definition within that document. We therefore here provide notes on the status of the sites referenced, so that a view can be taken, and an active link to the details.</i></p> <p><i>Potential Ramsar sites were identified in a project with a contractor working with Crown Dependency and Overseas Territory governments. One of these (Ballaugh Curragh) has been designated as both ASSI and Ramsar, and parts of some others have been designated as ASSI but a larger Ramsar site has not been given formal assessment yet and many areas remain to be assessed as ASSI. The others therefore remain as Ramsar site proposals, but not yet formally put forward for designation. They therefore do show where there is international level interest that meets the Ramsar criteria, but it has not been given full protection across those areas. Fuller assessment awaits resource.</i></p> <p><i>Here is the active link to the report, including annexes with the site details and criteria (Annex 2), and proposed boundaries (Annex 4) http://www.ukotcf.org/pubs/ramsarreview.htm.</i></p>
---------	--------------------------	---

ExQ1: Wednesday 18 December 2024

Responses due by Deadline 3: Wednesday 22 January 2025

12. Socio-Economics, Tourism and Recreation (SETR)

Retail storage on IoM

1SETR1.	IoM TSC	<p>Applicant's Response to RR: Retail Storage Capacity</p> <p>The Applicant responded to comments in the RR of the IoM TSC [RR-031] regarding proposals to increase retail storage capacity on the island (see RR-031-12 of [PD1-011]).</p> <p>Does this response address the concerns, or do the IOM TSC wish to make any further comments on this matter?</p> <p>TSC Response</p> <p><i>The Planning Application referenced by the applicant in their response was for minor changes to a warehouse associated with Tesco's online delivery service. The changes were primarily to increase accessibility and improve their distribution system and not related to overall storage provision for stock. However, the TSC is content that this has not materially affected the assessment and conclusions of Chapter 20.</i></p>
---------	---------	---