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Immingham Eastern Ro-Ro Terminal Case Team
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(By email only)

MMO Reference: DCO/2021/00004
Planning Inspectorate Reference: TR030007

23 October 2023

Dear Mr Gould,

Planning Act 2008, Immingham Eastern Ro-Ro Terminal

On 09 March 2023, the Marine Management Organisation (the “MMO”) received notice under Section 56 of the Planning Act 2008 (the “PA 2008”) that the Planning Inspectorate (“PINS”) had accepted an application made by Associated British Ports (the “Applicant”) for the determination of a development consent order (DCO) for the construction, maintenance and operation of the Immingham Eastern Ro-Ro Terminal (the “DCO Application”) (MMO ref: DCO/2021/00004; PINS ref: TR030007).

The DCO Application seeks authorisation for the construction, of a new 3-berth Roll-On/Roll-Off (Ro-Ro) terminal facility within the Port of Immingham (“the “Project”). This includes one Deemed Marine Licence (DML) under Schedule 3.

This document comprises the MMO comments in respect of the DCO Application submitted in response to Deadline 5.

The MMO submits the following:

- 1. MMO Comments on Responses to ExQ2**
- 2. MMO Comments on Deadline 4 Submissions**
- 3. MMO Update on Marine Ecology Matters**
- 4. MMO Update on the DML**

This written representation is submitted without prejudice to any future representation the MMO may make about the DCO Application throughout the Examination process. This representation is also submitted without prejudice to any decision the MMO may make on any associated applications for consent, permission, approval, or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.

Yours sincerely,





Jack Coe
Marine Licensing Case Officer

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1. MMO Comments on Responses to ExQ2

The MMO notes that several interested parties have provided responses to the second round of questions from the Examining Authority. The MMO has reviewed the following responses to ExQ1 and has provided a detailed response below to the following responses:

- REP4-008- Applicant's Response to ExQ2 with Appendices (The Applicant)
- REP4-014- Responses to ExQ2 (Environment Agency)
- REP4-016- Deadline 4 submission- Responses to ExQ2 (Natural England)

Please find below the MMO comments on these documents.

1.2 REP4-008- Applicant's Response to ExQ2 with Appendices

- 1.2.1 The MMO notes the Applicants consider that these works would constitute a 'Sustainable Port Development'. The MMO has reviewed the Applicant's rationale for reaching this conclusion and acknowledge the merit in their argument, however, we remind the ExA that the onus is on the Applicant to prove this and that this is not something the MMO would make comment on. The MMO notes that CLdN Ports Killingholme Ltd disagree with the Applicants on this point, and the MMO will keep a watching brief on discussions and any resolutions regarding this.
- 1.2.2 Regarding Physical Processes, the MMO is happy to re-confirm that no outstanding issues remain present, and we commend that Applicants for continuing to work with us on these matters.
- 1.2.3 The MMO notes that the ExA asked the Applicant questions regarding the current drafting of the DML. The MMO has provided updated comments on the DML in Section 4 of this response for review.
- 1.2.4 Regarding the questions around Underwater Noise and Migratory Fish, the MMO agrees with the Applicant that a constructive meeting was held with the Applicants, the MMO and the MMO's advisors on 21 September 2023. The MMO has provided an update on these matters in Section 3 of this response for the Applicants' review.

1.3 REP4-014- Responses to ExQ2 (Environment Agency)

- 1.3.1 The MMO notes the Environment Agency's (EA) position that the Construction Environment Management Plan (CEMP) is not completed as it is currently drafted. The MMO considers this to be a valid point given the ongoing discussion regarding the 'Outline' nature of this document. The MMO refers the ExA to Section 5 of our Deadline 4 Response [REP4-015] for the MMO position on this matter.
- 1.3.2 The MMO also notes the EA's request to be a consultee for this document once it is formally submitted by the Applicant. The MMO advocate this position and urge the Applicants to amend the DCO to ensure this is the case.

1.4 REP4-016- Deadline 4 Submission- Responses to ExQ2 (Natural England)



1.4.1 The MMO has reviewed Natural England's responses to ExQ2 and has no comments to make regarding them.

2. MMO Comments on Deadline 4 Submissions

The MMO is aware that several documents have been submitted into this Examination at Deadline 4 by various Interested Parties. The MMO has reviewed a number of these documents and has provided comment on the following documents below:

- REP4-005- 10.2.9- Statement of Common Ground Tracker
- REP4-006- 10.2.10- Principal Areas of Disagreement Tracker
- REP4-009- 10.2.39- Written Summary of the Applicants oral submissions at ISH3 with Appendices
- REP4-010- 10.2.40- Written Summary of the Applicants oral submissions at ISH4

2.1 REP4-005- 10.2.9- Statement of Common Ground Tracker

2.1.1 The MMO has reviewed this document in terms of the Applicant's engagement with the MMO. We note that the Applicant's position as of Deadline 4 is *'Positive discussions ongoing with MMO to settle comments in relevant representations, following which a SoCG will be settled. A further meeting has been arranged for after Deadline 4.'* The MMO agrees with this description of recent interactions.

2.1.2 The MMO attended the meeting in question with the Applicant to discuss the draft SoCG on 12/10/2023. The MMO was largely content with the work the Applicant had done and considered the document to be of a good quality. However, the MMO and Applicant agreed that this document would not be signed until the end of the Examination period, at which point, an updated SoCG could be submitted. Both parties agreed this would be beneficial to the ExA.

2.1.3 The MMO refers back to Point 2.3 of [PDA-013] for its full position on this matter and further recommends that the ExA consider that submissions of SoCG's be towards the end of the Examination process, rather than in the middle of it.

2.2 REP4-006- 10.2.10- Principal Areas of Disagreement Tracker

2.2.1 The MMO has reviewed this document and notes that the Applicants position is *'Positive discussions are ongoing as between the MMO and the Applicant, with a further meeting being arranged for after D4. The Applicant notes that the MMO is confident that issues will be resolved during Examination'*. The MMO agrees with this position and will continue to try and resolve all outstanding issues with the Applicant moving forward.

2.3 REP4- 009- 10.2.39- Written Summary of the Applicants oral submissions at ISH3 with Appendices

2.3.1 The MMO notes that, regarding any effects for the integrity of the Humber Estuary Special Area of Conservation, Special Protection Area and Ramsar site, the Applicant is confident that



any outstanding issues will be resolved prior to the end of Examination. The MMO concurs with this point regarding Marine Ecology matters, however, regarding impacts to these designated sites specifically, the MMO ultimately defers to Natural England.

2.4 REP4-010- 10.2.40- Written Summary of the Applicants oral submissions at ISH4

- 2.4.1 The MMO notes that the Applicants will be providing an updated position on their powers to dredge at this Deadline. The MMO welcomes this and has provided additional information from our perspective in Section 4 of this response.
- 2.4.2 The MMO notes that the Applicants were intending to ask the MMO whether or not it reviews the dDCO in its entirety, or just the DML. The MMO can confirm that it has read the DCO in its entirety. For clarity, the MMO process for these matters is that it will review the entire document and then focus its subsequent reviews on key articles and provisions, specifically those that relate to the MMO. This is the process that the MMO has followed in this instance.

3. MMO update on Marine Ecology Matters

3.1 Dredge and Disposal

- 3.1.1 For context, the MMO has previously commented that there might not be an issue with Polybrominated Diphenyl Ethers (PBDE) if the value was normalised prior to comparison with the proposed action levels to determine the level of risk.
- 3.1.2 There was discussion between the MMO and the Applicant outside of a formal meeting on 21/09/2023 regarding the calculation for the normalisation of results. The information provided was such that the Applicant may wish to also contract analysis for Total Organic Carbon (TOC) within the sample(s), the TOC concentration in a sample can be used to normalise PBDE results for the sediment within the sample, using the following calculation: $[2.5/TOC\%]*PBDE$ congener concentration]. As such, a TOC concentration greater than 2.5% will result in normalised PBDE levels being lower than their non-normalised levels. It should be noted that in some cases TOC will also be lower than the 2.5% assumed concentration and thus normalised levels of observed PBDE would be higher than their non-normalised levels. Where no TOC data is provided to normalise the sediment data, the MMO will assume a TOC concentration of 2.5%, thus resulting in an assumed normalisation factor of 1 (i.e., no change in levels).
- 3.1.3 Whilst one part of the dredge area has levels of relatively high concern, the overall level of contamination from PBDE (taking a weight of evidence approach) indicates that this would likely be acceptable considering the volume of dredged material as a whole. However, the Applicant stated that they would look to see whether there were any values for the area that could be used to normalise the concentration in that these may not be of concern if levels of organic carbon are above 2.5%. It should be noted that currently there is no approved method or laboratory for this determinand.
- 3.1.4 Data provided should be accompanied by a full method statement, including collection, storage, extraction and analysis for assessment, results observed may also need to be considered conservatively. This could be the case given the MMO previously published levels indicate levels on the Humber could be in the range of 2.8-3.71% depending on the physical composition (Cefas, 2003). No further information was provided on total organic carbon for consideration by the Applicant to mitigate this risk.



3.1.5 Ultimately, the MMO is happy to confirm that no outstanding issues remain on this case related to Dredge and Disposal activities. The MMO would add however, that we intend to issue the Applicant a letter stating that we approve of the sample analysis undertaken.

3.2 Underwater Noise

3.2.1 The MMO is aware that the Applicant is proposing that piling restrictions should only be applied to percussive piling (and there should be no restrictions on Vibro-Piling). Vibro-Piling is discussed further in a later section of this response. In summary, for percussive piling, the Applicants have proposed a restriction on the duration of piling in June and between August and October to minimise the risks to migratory fish. The maximum amount of percussive piling permitted within any 4-week period must not exceed 140 hours where a single piling rig is in operation or a total of 196 hours where 2 or more rigs are in operation. The measurement of time during each work-block described above must begin at the start of each timeframe, roll throughout it, then cease at the end, where measurement will begin again at the start of the next timeframe, such process to be repeated until the end of piling works. Further rationale to clarify the 140 hours and 196 hours proposal was provided by ABPmer at the meeting.

3.2.2 Furthermore, the MMO is aware that no percussive piling is to take place within the waterbody between 1 April and 31 May inclusive in any calendar year. Also, no percussive piling is to take place within the waterbody between 1 March to 31 March, 1 June to 30 June and 1 August to 31 October inclusive after sunset and before sunrise on any day.

3.2.3 The MMO has previously provided advice on noise modelling at previous deadlines. These comments were further discussed in a recent meeting with the Applicant on 21st September 2023. In response to the following “*Vibro-Piling will only result in a potential noise barrier across part of the estuary (circa 1km range and less than 50% of width affected at all states of the tide)*”, the MMO maintains that it cannot say for certain to what extent vibro-piling may effect behaviour (and the MMO cannot definitively conclude that more than half of the width of the estuary will be undisturbed and available for fish to continue their migration during periods of Vibro-Piling). Thus, there is a risk of impact (particularly behavioural effects) from both percussive and vibro-piling operations.

3.2.4 The MMO agrees that Vibro-Piling is generally considered as a mitigation measure when compared to impact piling, although this type of piling can still be quite loud (and has the potential to affect marine receptors). We would expect effects of lower magnitude (compared to impact piling) for Vibro-Piling, given that Vibro-Piling has a lower source level than impact piling and generally introduces less impact noise into the marine environment.

3.2.5 With regard to the following statement on Page 5: “*As was set out in the underwater noise assessment [APP-088], underwater noise monitoring has previously been undertaken in the Humber Estuary for the Green Port Hull (GPH) Project... This monitoring has enabled us to confirm that the key input parameters that were used in the model (namely the attenuation and absorption coefficient terms) are good estimates of the measured values for these parameters in the Humber Estuary In other words, the input parameters have been validated by real-world data and this gives us confidence that the model predictions are robust and provide a reasonable representation of the actual propagation of underwater noise in the Humber Estuary and the potential range of effects*”, please note that such environments are very complex, and there are too many uncertainties to claim that “the model predictions are robust” especially in the case of



such a simplistic model. We would reiterate our previous advice that the EA simple model specifies that the α coefficient has a rather large standard deviation, namely 3.77 dB/km, which means that, for example, one standard deviation away from the mean would reduce this attenuation from 5.23 dB/km to 1.46 dB/km, or a reduction of more than 3 times. This level of uncertainty should inform the confidence in the overall model predictions, which is more appropriate to give an indication of the order of magnitude of the potential effects rather than a precise prediction.

- 3.2.6 The MMO also notes the following statement: “*The Sound Exposure Level Single Strike (SELss) behavioural threshold that the MMO has suggested (135 dB SELss) as an alternative to what was applied in the ES (157 dB Sound Pressure Level Peak (SPLpeak)) is considered to be overly conservative and precautionary for Atlantic salmon as it is based on sound levels to which schools of sprat, which are a much more sensitive fish species to noise than salmon, responded on 50% of observations. The use of an intermediate behavioural threshold (139 dB SELss) commensurate with the lower hearing ability of salmon is considered more appropriate and results in very similar range of effects as the peak behavioural threshold that was used in the ES*”. This statement is largely correct. Sprat (as well as herring and anchovy) belong to the order Clupeiformes and are considered to be particularly sensitive to sound. Clupeids have a pair of elongated gas ducts that extend from the swim bladder and into the skull, enabling sound pressure to be transduced from the swim bladder to the ear (Webb et al., 2008). Thus, an alternative threshold may be more appropriate for Atlantic salmon. However, any behavioural disturbance threshold must be robust and supported by appropriate, peer-reviewed evidence.
- 3.2.7 In summary, the primary outstanding issue (from an underwater noise point of view) is agreement on the mitigation measures. This has been discussed in further detail in Section 3.3.

3.3 Migratory Fish

- 3.3.1 The MMO notes that the Applicant predicts that vibro-piling will only result in a potential noise barrier across part of the estuary (*‘circa 1 km range and less than 50% of width affected at all states of the tide’*). However, having discussed the method of UWN modelling used in the assessment with our advisors, the MMO understands that there is some uncertainty regarding the accuracy of the modelling, which means that confidence in the predicted range of effect (<1 km / < 50% of the estuary at all tidal states) is low. However, noting that vibro-piling will be undertaken for limited periods of up to 20 minutes per 24-hour period, in the event that UWN from vibro-piling did propagate across the full width of the estuary, then it would be for short periods only, so any potential acoustic ‘barriers’ to fish movement would be short-lived. In addition, given the lower source level from vibro-piling (compared to percussive piling) we are content that the risk to fish of physiological (physical injury) and behavioural impacts is relatively low. For these reasons, we are content that the temporal piling restrictions do not need to be applied to vibro-piling. However, to ensure that prolonged periods of vibro-piling are not carried out each day, the MMO recommend that a cap on the duration of vibro-piling per 24 hours be conditioned within the marine licence.
- 3.3.2 Concerning the Applicant’s proposed 140 hour (single rig) 196-hour (2+ rigs) percussive piling timeframe over a 4-week period during June and August – October, the Applicant has confirmed that their assessment was based on a worst-case assumption that percussive piling would be undertaken at full power for up to 45 minutes for each pile (and up to 180 minutes for four piles per day), however, in reality this 45 minute period would be made up of a 20 minute soft-start and



25 minutes of piling at full power. This addresses part of the comments made in our previous advice by confirming that no additional time needs to be factored in, beyond the 45-minute piling time per pile to allow for soft-start procedures. However, as per our previous advice, if the 'worst-case' scenario for percussive piling is per 180 minutes per day (45 mins x 4 piles), over a 4-week period this equates to 5040 minutes / 84 hours of percussive piling. So, it remains unclear why the Applicant is seeking permission to undertake 196 hours of percussive piling over a 4-week period as this is over double the piling time they need under their worst-case scenario.

- 3.3.3 To add to this, our key concern is that by not managing noise on a daily basis (i.e., not limiting the duration of percussive piling each day to 180 minutes), the Applicant could, in theory, pile throughout all hours of daylight, for several days at a time, during sensitive migratory periods. If the Applicant proposes to install no more than 4 piles per day under a worst-case scenario, then it is unclear why they are unable to commit to a daily piling limit of 180 minutes. These questions have not been clearly answered within the Applicant's response.
- 3.3.4 Furthermore, if, as per the Applicant's response, a daily restriction would decrease any flexibility in the construction and increase the overall construction programme unnecessarily, then it suggests that they wish to pile for longer than 180 minutes per day, in which case, their worst-case scenario for percussive piling is greater than 180 minutes per day and has not been assessed in the modelling.
- 3.3.5 Furthermore, the Applicant has proposed for percussive piling, that the measurement of time during each work-block must begin at the start of each timeframe, roll throughout it, then cease at the end, where measurement will begin again at the start of the next timeframe, such process to be repeated until the end of piling works. It is unclear whether the Applicant has simply adopted this from the licence conditions applied to AMEP or if this condition has been suggested by an alternative statutory consultee (e.g., Natural England). It would be helpful to know the reason why this work-block measuring is considered more appropriate than a daily/24-hour limit on piling.
- 3.3.6 The MMO thanks the Applicant for exploring the feasibility of undertaking piling according to tidal state, as was suggested in previous advice which proposed that during the month of June, no percussive piling should take place for the first 5 hours of the ebbing tide to allow migration of Juvenile Salmon and Sea Trout, and between 1st August and 31st October, no percussive piling should take place for 3 hours following low water to allow migration of adult salmon and sea trout on the flooding tide. The Applicant has considered the tidal state and hours of daylight available for working during the periods of June and August to October and has determined that working to such a schedule would be prohibitively difficult and would likely result in a prolonged period of construction. For these reasons, the MMO is content that prolonging the duration of construction schedule even further by piling according to tidal state is not a viable option and only prolongs the period to which sensitive receptors in the Humber are exposed.
- 3.3.7 In summary, the main ongoing issues that have been discussed through various consultations and meetings concern the following:
- The risk of having an overly flexible piling restriction of up to 196 hours over a 4-week period, which would make it possible for the Applicant to carry out longer periods of piling during sensitive migratory periods.
 - The need for an appropriate percussive piling restriction that is proportionate to the development, and actionable and enforceable.



The MMO will continue to discuss this matter with the Applicants throughout the remainder of the Examination.

4. MMO Update on the DML

The MMO has reviewed the most recent iteration of the DML provided by the Applicant and discussed their most recent updates in a meeting held on 12/10/2023. The MMO was pleased that several of our concerns have been resolved by the Applicants, however, we offer the following, outstanding matters for the Applicants consideration:

Part 1

4.1.1 The MMO has discussed the definition of ‘Capital Dredging’ with the Applicants in a meeting held on 12/10/2023. It was agreed in that meeting that the Applicants would amend the definition in the DCO to align with how the MMO currently defines such an activity. The MMO has provided the definition below for the Applicants usage.

4.1.2 *‘Capital dredging is dredging to a depth not previously dredged, or to a depth not dredged within the last 10 years. Capital dredging is generally undertaken to create or deepen navigational channels, berths or to remove material deemed unsuitable for the foundation of a construction project’.*

4.1.3 With regards to the definition of ‘Sediment Sampling Plan’, the MMO is proposing two different definitions to be included. We suggest the following wording:

“2021 sediment sampling plan” means –

(a) *the plan approved by the MMO on 24 September 2021, which details—*

- (i) *a detailed dredging methodology;*
- (ii) *dredge locations;*
- (iii) *dredge amounts (total and annual, if applicable);*
- (iv) *dredge depths;*
- (v) *duration of dredging activities;*
- (vi) *whether the dredge is a capital dredging activity or a maintenance dredging activity; and*
- (vii) *specific gravity of the material or material type; and*

(b) *any further sediment sampling analyses which may be approved by the MMO in accordance with condition 18(2) prior to the expiry of the 2021 sediment sampling plan”*

“future sediment sampling plan” means –

(a) *any subsequent sediment sampling plan approved by the MMO, which details —*

- (i) *a detailed dredging methodology;*
- (ii) *dredge locations;*
- (iii) *dredge amounts (total and annual, if applicable);*
- (iv) *dredge depths;*
- (v) *duration of dredging activities;*
- (vi) *whether the dredge is a capital dredging activity or a maintenance dredging activity; and*
- (vii) *specific gravity of the material or material type;”*



4.1.4 It is the MMO's view that Condition 6(5) and 6(8) should be amended to include reference to named vehicle and also to correct a typo in condition 6(8) as indicated in bold below:

*“any changes to details supplied under subparagraph (2) must be notified to the MMO in writing no less than 24 hours prior to the agent, contractor or **named** vessel engaging in the licensed activity in question.”*

See also condition 6(8); *“The undertaker must request that the masters responsible for the **named** vessels that will be carrying out any licenced activity on behalf of the undertaker as notified to the MMO under condition **6(5)** make a copy of this licence available for inspection on board such **named** vessels during the carrying out of any licensed activity.”*

Part 2

4.1.5 It is the MMO's view that Condition 6(5) and 6(8) should be amended to include reference to named vehicle and also to correct a typo in Condition 6(8) as indicated in bold below:

*“any changes to details supplied under subparagraph (2) must be notified to the MMO in writing no less than 24 hours prior to the agent, contractor or **named** vessel engaging in the licensed activity in question.”*

See also condition 6(8); *“The undertaker must request that the masters responsible for the **named** vessels that will be carrying out any licenced activity on behalf of the undertaker as notified to the MMO under condition **6(5)** make a copy of this licence available for inspection on board such **named** vessels during the carrying out of any licensed activity.”*

4.1.6 The MMO notes the following wording in Condition 7 in this DML: ‘*The licence holder must undertake the works in accordance with the sediment sampling plan as approved by the MMO and detailed in the construction environmental management plan*’. It is the MMO's view that this paragraph does need to be included in reference to the capital dredge. It is the MMO's view that the following paragraph should be included in this condition:

“7. The undertaker must undertake the capital dredge in accordance with the 2021 sediment sampling plan or the future sediment sampling plan, as approved by the MMO and detailed in the outline construction environmental management plan”.

4.1.7 Additionally, the MMO considers that the Applicants must insert a sentence in this condition which stipulates that they must submit the sample analysis from the plan to the MMO for consultation.

4.1.8 Furthermore, having discussed this point with the Applicant, the MMO requests that a condition is included in the licence that approval letter of analysis from the 2021 sample plan must be submitted to the MMO prior to dredging being undertaken.

4.1.9 Regarding Condition 11(1), The MMO suggests the following amendment:



“No licenced activities may be commenced until a construction environmental plan ~~for them~~ covering these activities has been submitted”.

4.1.10 Regarding Condition 11(2), the MMO notes that the word ‘separate’ has been misspelled. The MMO expects this to be corrected in the next draft of the licence.

4.1.11 Regarding Condition 18(1), If the suggested changes to the definition of the sediment sampling plan are accepted then these need to be reflected in this condition as follows, with the following change:

*18.(1) Any —a) Any sediment sampling analyses undertaken by a laboratory validated by the MMO and approved by the MMO as part of **either the 2021 sediment sampling plan or any future sediment sampling plan** is valid for a period of 3 years from the date when those analyses were undertaken. Where the validity period for sediment sampling analyses as set out in sub-paragraph (1) above expires, the undertaker must submit a further sediment sampling plan request to the MMO for its approval*

Part 3

4.1.12 Regarding the meaning of ‘Application’, the MMO notes that both ‘Sediment Sampling Plan’ and ‘Construction Environment Management Plan’ have now been removed from this description. The MMO disagrees with this omission and asks why the Applicant considers this to be appropriate?

4.1.13 Regarding the 6 week timescale referenced in Condition 28, twice in this Examination it was made clear that the 6 week period is not acceptable. The timeframe should be extended on the basis that the MMO endeavours to provide a determination on 90% of applications within 13 weeks from validation and fee estimate acceptance, however there is no guarantee that this determination when granted will be positive. The MMO requests that this statement is amended to reflect the 13 week standard KPI target.

Yours sincerely,

[Redacted signature]

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References

Cefas, 2003. Organic carbon content in dredge material sediments collected between 1999 and 2001 reported in AEMR54 (Sci. Ser., Aquat. Environ. Monit. Rep., CEFAS, Lowestoft, (54), 98pp).

<https://www.cefas.co.uk/publications/aquatic/aemr54.pdf>).



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