

ABLE MARINE ENERGY PARK (MATERIAL CHANGE 2 – TR030006)

UPDATED ENVIRONMENTAL STATEMENT

CHAPTER 4: DESCRIPTION OF CHANGES TO DEVELOPMENT & ALTERNATIVES

Able Marine Energy Park, Killingholme, North Lincolnshire



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4.1.0 Introduction

- 4.1.1 This Chapter of the Updated Environmental Statement (UES) provides an overview of the remit and purpose of the AMEP DCO, a description of change to the development as proposed under Material Change 2, and details of other concurrent applications which are being considered at the time of this submission.
- 4.1.2 Furthermore, this Chapter of the UES also provides a consideration of the alternatives to the proposed development, again noting that this is principally related to the material amendment proposed rather than the overarching AMEP scheme given that this already benefits from an extant DCO.

Purpose of the AMEP DCO

- 4.1.3 The proposed development of AMEP is directly related to the emerging global aim to decarbonise world energy production. The need to decarbonise world energy production, and its overriding benefit to the global environment, is detailed in Chapter 5 of the Environmental Statement (ES) prepared for the DCO application in 2012 (the original ES)¹.
- 4.1.4 No change is being sought to the fundamental nature or overarching purpose of the development which is to provide a new and substantial manufacturing and installation base for the offshore marine energy sector. Currently, this market is anticipated to be dominated by offshore wind energy with this sector expected to contribute significantly to a new secure, low carbon and balanced energy mix for the UK ('The Ten Point Plan for a Green Industrial Revolution', HM Government, November 2020²).
- 4.1.5 As well as having quays to receive and export raw materials and products, the development will also provide facilities that are necessary to assemble the offshore generators, including offshore wind turbines (OWT's), in preparation for loading onto installation vessels for direct transport from their place of manufacture to the offshore development site.
- 4.1.6 The consented development is described in Chapter 4 of the original ES³, and this Chapter only describes the change to the development that is proposed. The change is of a limited nature and principally relates to Work No. 1 (the Quay) and associated dredge and disposal operations which comprise associated development. The only amendment proposed on land is a minor amendment to the consented diversion route of a public footpath in North Lincolnshire (Footpath 50). This particular amendment is proposed in order to avoid creating a new crossing point of an operational railway line. The proposed amendments are illustrated in the drawings included in Technical Appendix UES4-1.

Approved Non-Material Change

- 4.1.7 At the start of the consultation on the Preliminary Environmental Information Report (PEIR) there

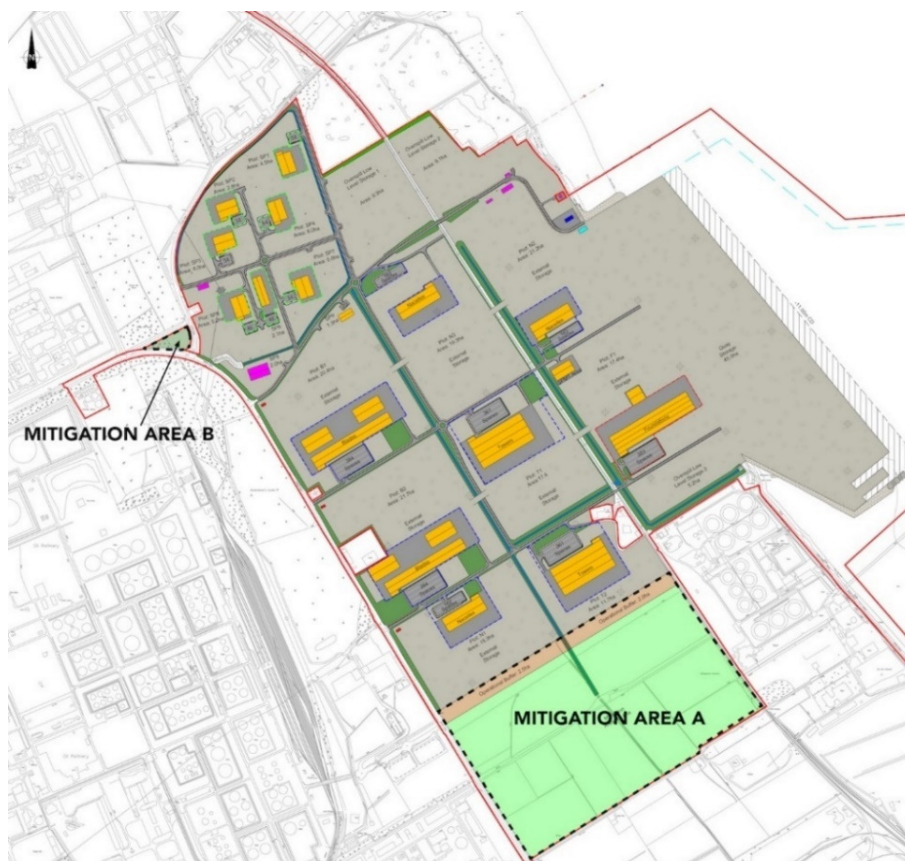
¹<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR030001/TR030001-000310-05%20-%20Need%20for%20Development.pdf>

²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936567/10_POINT_PLAN_BOOKLET.pdf

³<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR030001/TR030001-000309-04%20-%20Description%20of%20Development.pdf>

was a concurrent non-material change (NMC) application to amend the DCO. That application sought to re-site the consented location of Mitigation Area A from Killingholme Marshes, refer to Figure 4-1, to Halton Marshes, where former agricultural land had already been developed as ecological mitigation for AMEP. During the consultation period the Amendment Order implementing the NMC came into force.⁴ The Amendment Order has removed former Mitigation Area A from the order limits.

Figure 4-1: Former Location of Mitigation Area A⁵



Permitted Uses of Development

- 4.1.8 For the avoidance of doubt, the restrictions on cargo and development set out in Schedule 11, paragraphs 4(1) – 4(2) of the DCO are not proposed to be amended. Specifically, these restrictions limit the type of cargo that can pass over the quay to items associated with the offshore renewable energy sector and limit the provision of onshore facilities to the manufacture, storage, and assembly of offshore renewable energy infrastructure. As such, the proposed change does not alter either the use or intensity of the previously permitted AMEP DCO.

⁴<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR030001/TR030001-003521-TR030001%20-%20NMC%20-%20revised%20Amendment%20Order.pdf>

⁵ Note: Mitigation Area B has been constructed and now provides habitat for a population of Great Crested Newts that has been translocated from the AMEP site.

4.2.0 Consultation Responses

Scoping

4.2.1 The Planning Inspectorate's comments relating to the description of the development are listed in Table 4-1 below.

Table 4-1: Scoping Opinion

Page & Paragraph No.	Scoping Opinion	Comments	Outcome	Reference within UES
Page 6, para 2.3.1	The ES should quantify the amount of land to be reclaimed from the estuary and provide a clear updated description of the location	Noted	Quantification and description of the losses are explained in the ES	Appendix UES11-2
Page 6, para 2.3.4	The updated ES should provide specific reference to the location of information on SPMTs contained in the original ES	Chapter 4, Table 4.2 identifies an SPMT Service Building; Chapter 4, para 4.8.5 states that components will be moved onto the quay using SPMTs; Chapter 4, para 4.8.23 states that most sections will be moved with SPMT machines.	The use of SPMTs does not represent a change to the operation of the development originally proposed	SPMTs are not material to the UES
Page 6, para 2.3.5	The updated ES should describe the main alternatives considered for anchoring the quay piles and the reasons for selecting the final design	Tubular steel anchor piles and flap anchors are the only anchoring alternatives considered and the application does not seek to substitute flap anchors with anchor piles but seeks to secure the option of using either or a combination thereof.	A single design is not preferred	Paragraph 4.3.3 and Appendix UES4-2
Page 7, para 2.3.7	Any changes to decommissioning impacts should be described in the updated ES	There are no changes in decommissioning impacts	No further action	None

Preliminary Environmental Information Report

4.2.2 Responses to comments received from the statutory consultation on the Preliminary Environmental Information Report (PEIR) carried out between 15 April and 26 May 2021 are set out in Table 4-2 below.

Table 4-2: Responses to the Consultation

Reference	Comments	Response
MMO	Changes to the dredging proposals are unclear.	Refer to Appendix UES4-2 Dredging Strategy for a comparison of the consented and proposed volumes.
C.Ro	Concern that the original red line boundary extends through their site whilst the authorised development under the DCO does not include any of this land.	Refer to Sheet 7 of the certified Works Plans included in Annex UES4-3. The red line boundary is not affected by the material change and it is not being amended.
C.Ro	Clarify the purpose of the diversion of Footpath 50.	Refer to paragraph 4.3.13 below. Also note that Network Rail confirmed in its response to the PEI report that it <i>'is supportive of the proposal to divert Footpath 50 away from the railway crossing to the north where there is no operational railway'</i> .
C.Ro	C.Ro's scheduled ferry services should be given priority over construction vessels.	No change is proposed to Schedule 9 of the extant DCO.
C.Ro	Concern that the proposed change to the deposit locations for the dredge arisings will impact on the ability of existing dredging activities to dispose of dredge arisings <i>'conveniently and at low cost'</i> .	The additional material to be deposited at the marine disposal sites will be disposed of into HU081 and HU082, both of which are reserved for inerodible deposits. This will not impact on the capacity of any existing sites that receive erodible maintenance dredge arisings. A greater volume of maintenance dredge arisings from the development is predicted. This material will be deposited into HU080 as permitted in the extant DCO. Hu080 has historically received very large volumes annually. Refer to the Dredging Strategy at Appendix UES4-2.

4.2.3 Further information regarding the PEIR Consultation exercise is provided within Chapter 5: Scoping and Consultation.

4.3.0 Changes to the Authorised Development

- 4.3.1 This section details the amendments to the authorised development. For ease of reference, these have been broken down into distinct work parcels of the overarching AMEP scheme as contained within the original ES for the DCO.

Changes to the NSIP: Work No.1 – the Quay

- 4.3.2 Work No. 1 occupies land owned by the Crown Estate specifically parcel No.'s 08001 and 09001 on the Land Plans⁶. At the time of the application, the land needed for the development of Work No. 1 was leased to Associated British Ports, but since the development was consented in 2014, the lease for the relevant parcel of land has been acquired by the Applicant but surrendered back to The Crown Estate. Pursuant to the start of the works, Able Humber Ports Limited (AHPL, the Company named in the DCO) now has an option to lease the land needed to construct the Quay.
- 4.3.3 The approved development is detailed on the drawings listed in the DCO at Schedule 11, paragraph 6 (refer to Technical Appendix UES1-1 for a copy of the DCO). The following changes are proposed to Work No.1:
- a) The specialist berth at the southern end of the quay is to be reclaimed as the vessel that was to use the facility (refer to Figure 5.18 of the original ES⁷) has not been constructed and is not likely to be built;
 - b) At the northern end of the quay, the quay line is to be set back 61 m over a length of 288 m to create a barge berth and allow the potential for end load in of cargo from Ro-Ro vessels;
 - c) Alternative details are proposed for the piled relieving slab to the rear of the quay which is shown on the approved drawing AMEP_P1D_D_003⁸. Options are sought to locate this slab at the ground surface, or it could be omitted altogether subject to detailed design, refer to drawing AME-036-00003 at Appendix UES4-1 which illustrates the alternatives being sought; and,
 - d) Alternative details are proposed for anchoring the quay wall. The option is sought to use more conventional steel anchor piles and tie bars in-lieu of flap anchors to tie back the quay piles, but the option to use flap anchors will remain, refer to drawing AME-036-00003 at Appendix UES4-1.
- 4.3.4 The net effect of changes (a) and (b) above is that marginally less land would be reclaimed from the estuary, refer to Figure 4-2. Nevertheless, no changes are proposed to the compensation proposals taken into account in the Secretary of State's Habitats Regulations Assessment for the consented development⁹. The change in habitat loss is summarised in Table 4-3 below, and the amendment results in a net reduction in the footprint of the quay from 45ha to 43.6ha. The changes are further

⁶https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR030001/TR030001-001764-121026_TR030001_Able%20Land%20Plans%20-%20Revision%203.zip

⁷<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR030001/TR030001-000310-05%20-%20Need%20for%20Development.pdf>

⁸<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR030001/TR030001-000293-Quay%20Sections%201%20of%202.pdf>

⁹<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR030001/TR030001-002225-SoS%20Decision%20letter%20with%20annexes.pdf>

detailed on drawings AME-036-00001 - 00002 at Appendix UES4-1.

Figure 4-2: Consented Quay Alignment and Proposed Changes

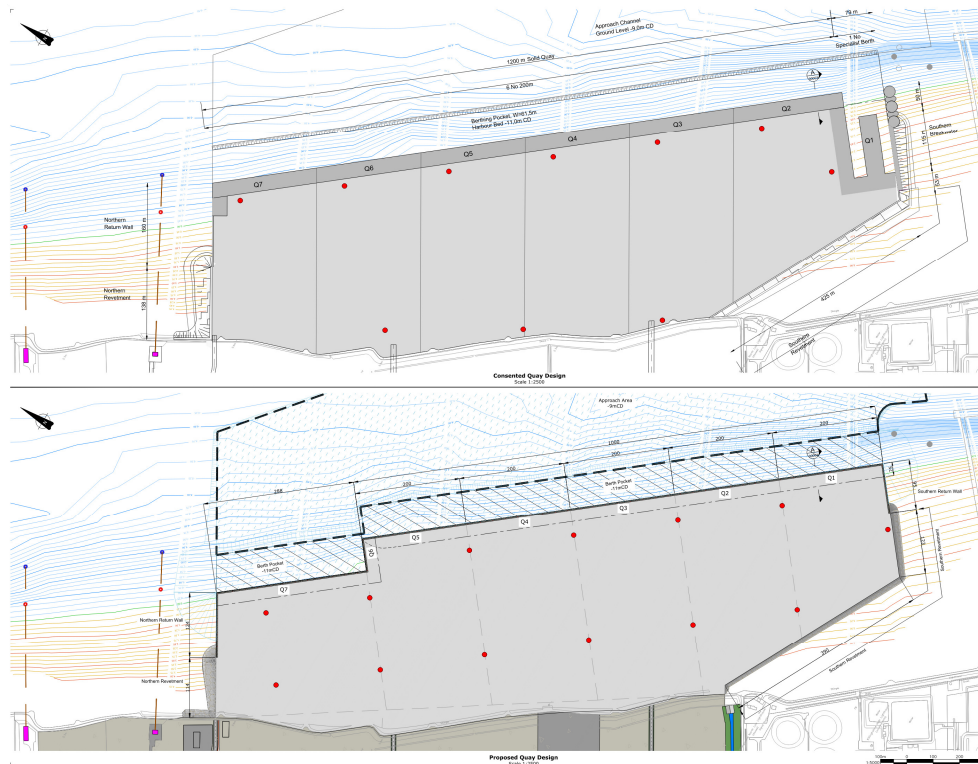


Table 4-3: Comparison of Habitat Losses

Habitat Type	Habitat Loss Arising from Consented Scheme Agreed with NE in 2012 ¹ (ha)	Habitat Loss with Material Change (ha) (Technical Appendix UES11-2)
1130 Sub-tidal	13.5	10.4
1140 Mudflat	43.1	39
1310/1330 Saltmarsh	2	8.1
¹ Refer to SoCG, Table 3.2 and paragraphs 3.5.1 -3.5.2 ¹⁰		

¹⁰<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR030001/TR030001-001606-SOCG009%20TR030001%20Able%20Humber%20Ports%20Ltd%20Statement%20of%20Common%20Ground%20with%20Natural%20England%20and%20the%20Marine%20Management%20Organisation.pdf>

- 4.3.9 The permitted deposit locations for dredge arisings are prescribed in the Schedule 8 paragraph 11(2) of the DCO (Technical Appendix UES1-1). It is proposed to amend the deposit site for 1,100,000 tonnes of clay that is to be dredged to form the berthing pocket from its consented location on the *'terrestrial area landward of the existing Killingholme Marshes flood defence wall'*, to deposit sites HU081 and HU082. Both of these sites are licensed deposit sites within the Humber estuary and are identified on drawing AME-036-10014 within Appendix UES4-1.
- 4.3.10 The reason for this change is that these dredge arisings, comprising Till, had been intended to be used to raise levels on the AMEP site. However, ground raising over most of the site was actually undertaken in 2014/15 pursuant to planning permissions PA/2013/0519 and PA/2014/0512 obtained from North Lincolnshire Council under the Town and Country Planning Act. As it is intended to develop the remainder of the site concurrently with the quay, this opportunity for beneficial use as fill to the terrestrial areas of the AMEP site itself, is potentially lost and an alternative use or a disposal site is required. If, at the relevant time any material can be used within the AMEP site or elsewhere, such as within the reclamation site itself, then permission to deposit within the estuary would not prevent such an alternative for beneficial use being implemented in any event.
- 4.3.11 An estimate of marine construction vessel movements is set out in Chapter 14¹¹, paragraph 14.6.27 of the original ES. The original estimate remains valid as, upon review, it has included for all dredged material to be deposited within the estuary, notwithstanding that 1.1M tonnes was to be deposited on land.

Changes to Public Rights of Way

- 4.3.12 Schedule 5 of the DCO (Technical Appendix UES1-1) authorises the diversion of two public footpaths; the diversion routes are shown on the approved Rights of Way Plans. A minor amendment is proposed to the diversion of Footpath 50 in the district of North Lincolnshire.
- 4.3.13 The change to the diversion is desirable in order to avoid the diversion crossing the Killingholme Branch railway where the railway is still technically operational, albeit that it is many years since any train has actually passed over the tracks at the authorised crossing point.
- 4.3.14 The authorised crossing point is shown on Rights of Way Plan Sheet No. 5¹² and is also shown in Figure 4-4 below together with the proposed alternative route. The proposed amendment is further shown on drawing AME-036-00004 included in Appendix UES4-1.

Changes to the Construction Methodology

The Quay

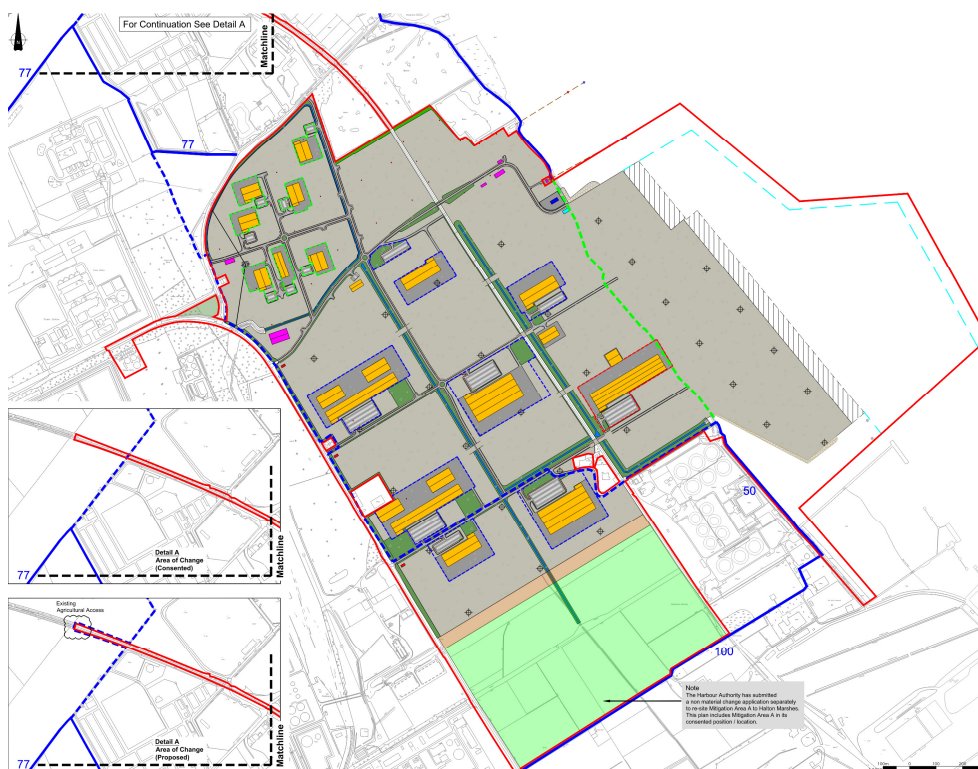
- 4.3.15 In order to facilitate early handover of an operational section of quay, the works are now proposed to commence at the southern end of the quay and progress northwards. On this basis, the construction sequence shown on the DCO approved drawings AMEP_P1D_D_101 to 103 is proposed to be amended, and thereby superseded, by the alternative sequence shown on application drawings AME-036-10009 to 10011 which are included in Appendix UES4-1.

¹¹<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR030001/TR030001-000319-14%20-%20Navigation.pdf>

¹²<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR030001/TR030001-000558-Rights%20of%20Way%20Plan%20Sheet%20No.%205%20of%2012.pdf>

- 4.3.16 The alternative options for anchoring of the quay wall and for the piled relieving slab, or for omitting the piled relieving slab altogether, will not give rise to any materially different construction operations to those described in paragraphs 4.4.4 *et seq* of the original ES and assessed in subsequent Chapters contained therein. Notwithstanding this, these amendments to the construction methodology / phasing have been considered within this UES where appropriate.

Figure 4-4: Footpath 50 Consented Route (Main plan and top inset) and Proposed Change (Bottom Inset)



Operational Details

Vessels

- 4.3.17 As the specialist berth is to be omitted, the specialist vessel will no longer be required to berth at the facility. The new barge berth at the northern end will enable Ro-Ro vessels to berth and unload directly.
- 4.3.18 The spread of operational vessels set out in Chapter 14, Table 14.12 of the original ES¹³ will change as a consequence and the revised estimate of vessel movements associated with the operation of the AMEP Quay is shown in Table 4-4 below.

¹³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR030001/TR030001-000319-14%20-%20Navigation.pdf>

Table 4-4: AMEP Operational Phase Vessel Movements

Vessel Type	DCO – Original ES		Proposed – UES		Comparison / Change	
	Annual Number of Trips	Annual Number of Movements	Annual Number of Trips	Annual Number of Movements	Annual Number of Trips	Annual Number of Movements
Foundation Transfer Vessels	12	24	0	0	-12	-24
Installation Vessel	100	200	100	200	No change	No change
1,500 Tonne Support Vessel	100	200	100	200	No change	No change
6,000 – 10,000 Tonne Cargo Ship	50	100	50	100	No change	No change
TOTAL	262	524	250	500	-12	-24

- 4.3.19 The overall change in annual number of trips and movements represent a very minor change from the original ES given the context of the existing number of shipping movements within the Humber Estuary, which is in the order of 25,000-30,000 per annum.

The Harbour Limits

- 4.3.20 The limits of the harbour are delineated by a boundary line defined by coordinates listed in Schedule 10 of the DCO (Technical Appendix UES1-1). The change in the quay alignment necessitates a consequential change to the limits of the harbour and the proposed change is shown on drawing AME-036-00006, included in Appendix UES4-1.

Withdrawn and Amended Plans and Drawings

- 4.3.21 A list of withdrawn and superseded plans and drawings (Table 1-4), along with a list of new, revised and retained plans and drawings (Table 1-5) are provided within Chapter 1 of this UES. The new, revised and retained drawings suitably reflect the various material amendments described above.
- 4.3.22 The changes described above also give rise to minor changes to the Works Plans included with the application and to some definitions within the DCO which are addressed in the draft Amendment Order.

4.4.0 Consideration of Alternatives

- 4.4.1 As detailed within Chapter 2: Environmental Assessment Process, the 2017 EIA Regulations (as amended) require, amongst other things, that the EIA provides a description of the main alternatives to any scheme that have been reasonably considered by the Applicant.
- 4.4.2 Whilst the principal consideration of alternatives is contained within the original ES, the section below provides an update to the consideration of alternatives with respect to the proposed material amendment (Material Change 2). Given the scope of the change, these considerations have been separated between 'terrestrial' and 'aquatic/quay' alternatives.

Terrestrial Alternatives

- 4.4.3 The original alternatives that have been considered by the Applicant are fully reported in the original ES which supported the DCO. The only amendment to the terrestrial development is the route of Public Footpath 50 in the district of North Lincolnshire and, for that, the following alternatives were considered following consultation with Network Rail:
- a) Changing the agreed new route of the footpath to avoid crossing any tracks.
This is the solution now proposed as the safest and most economical solution with the least environmental impact.
 - b) Follow the current route but install a footbridge.
This would be a significant structure and also a potential barrier to the ambulant disabled, unless extensive ramps were provided.
 - c) Seek permission from the Office of Rail and Road (ORR) for a level crossing of the railway as currently routed.
ORR were consulted and advised, 'Ordinarily ORR does not 'give permission'. If consulted, we ensure that a proper risk assessment has been done and the duty to ensure the risks have been mitigated to the lowest reasonably practicable level has been complied with. We did that at the time of the first discussions. If AHPL has now concluded that a footpath level crossing is the most reasonably practicable method of accommodating the right of way that would satisfy our involvement', (e-mail ORR to BDB Pitmans, 21 September 2020).

Alternative (a) above is plainly safer, subject to approval.
 - d) Look to move the buffers.
This could have unforeseen consequences on C.Ro and C.Gen's use of the railway. On this basis, such an amendment would likely be unacceptable to these third party users of the railway.

Quay Alternatives

- 4.4.4 With regard to the layout of the quay, the original alternatives considered by the Applicant are examined within the original ES and represented by the DCO itself.
- 4.4.5 A number of different quay alignments and dredge depths were considered as an alternative to the consented scheme and these are reported in Appendix UES4-4. In short, the option of providing the

inset berth for Ro-Ro vessels was considered at both the upstream and downstream ends of the quay and in combination with various dredge depths in the berthing pockets and Approach Channel. The overall conclusion presented at the end of the report was that:

‘(The upstream inset has) reduced impacts on the area behind the upstream intakes compared to (a straight quay and a downstream inset), which have the northern end of the AMEP reclamation 61m further offshore and thereby increasing the zone of impact over the upstream area.

(A downstream inset) with (a) downstream training wall has no significant reduction in overall sedimentation compared to .. (an inset without a training wall) but leads to further impacts on the flow and sedimentation at the adjacent SKOJ’.

- 4.4.6 On the basis of the preliminary modelling described above, an upstream inset was proposed.
- 4.4.7 As outlined within Section 4.3.0 above, the proposed material change is desirable for the AMEP scheme to be implemented at pace and to resolve issues that have emerged subsequent to the DCO coming into force. Notwithstanding this, were the material change not to be brought forward/consented, the extant DCO would remain implementable and constitute the ‘fall back’ position upon which Able Humber Ports Limited would rely.

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