

**Highways England: A303 Amesbury to Berwick  
Down Project, Development Consent Order  
Application**

**Scheme Reference: TR010025**

**Written Representation on Principal Issue 10  
Landscape and Visual Aspects of the LVIA**

**for**

**The Stonehenge Alliance  
(Reference No. 2001870)**

**by Andy Norfolk**

*NOTE ON THIS ARCHIVED EDITION*

*The footnotes in the original submission to the Examining Authority used links to documents published on the Planning Inspectorate. Since these are not permanent, the documents have been uploaded to the Stonehenge Alliance website and re-linked.*

*Other redundant links have been updated. 12 March 2026*

**LANDSCAPE AND VISUAL ASPECTS OF THE LVIA**

By Andy Norfolk

**Landscape statement summary**

- 1 The Stonehenge, Avebury and Associated Sites World Heritage Site (WHS) designation explicitly refers to interrelated monuments and their associated landscapes. The WHS designation is not only an archaeological and cultural designation, but also encompasses “landscapes without parallel”.
- 2 The Landscape and Visual Impact Assessment (LVIA) in Chapter 7 of the Environmental Statement (ES) does not properly consider the implications of a designation recognising the special landscape of the Stonehenge WHS at an international level. Instead it only acknowledges designations up to regional and national level. This is contrary to advice in the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3).
- 3 A failure to take the international status of the WHS into account has led to a downplaying of landscape and visual effects because an entire level of classification has been omitted from the process as demonstrated in the tables included in ES Appendix 7.2 LVIA Methodology.
- 4 The method used for assessing impacts has relied too heavily on tables without the necessary supporting detailed narrative descriptions of effects, particularly on landscape elements.
- 5 Individual landscape receptors which could be affected have not been identified and discussed in detail. Instead the only aspect of the landscape which appears to have been considered is that it is open and rolling.
- 6 No consideration has been given to the interrelation between monuments in the WHS.

- 7 The viewpoints considered in the LVIA do not take into account all views, nor those with the potentially greatest effects. The selection of viewpoints has been focussed on public rights of way. There are however areas of the WHS that are currently publicly accessible and opening up access to more areas is planned. This should have been considered and effects on people at these viewpoints from these areas should have been assessed. The A303 currently provides public views of the WHS and the proposed replacement byway would do so in future. This does not seem to have been taken into account in the LVIA.
- 8 The landscape effects of the cuttings and tunnel portals and the very large junction proposed west of Longbarrow Crossroads have been discussed, but then their effects have been apparently discounted because of the supposed benefits of putting part of the A303 in a tunnel. It is not correct methodology to pretend that inconvenient effects do not exist and they should not be ignored in a balance of effects in the way that has been done in the LVIA.
- 9 The methodology used in the LVIA has failed to consider important landscape and visual effects and has down-played the significance of those that have been considered by a failure to recognise the designation of the Stonehenge WHS as an internationally important historic landscape.

## **Introduction**

- 1 I am Andy Norfolk. I have a diploma in Landscape Architecture and a Master of Science degree in Landscape Ecology, Design and Maintenance. I became a fully qualified member of the Landscape Institute in 1984. I worked for a variety of employers in the public and private sectors from 1977. I was the “landscape engineer” for Wiltshire County Council highways department from 1984 to 1989. I set up my own practice in 1994 which I ran until I retired at the beginning of September 2017. I have worked on many large-scale projects for industrial, agricultural, residential, highways, landfill and land reclamation developments. I have also carried out many landscape and visual impact assessments and given evidence at planning inquiries.
- 2 Article 4 of the World Heritage Convention (1972) says:

*“Each State Party to this Convention recognizes that the duty of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage referred to in Articles 1 and 2 [i.e. World Heritage Sites] and situated on its territory, belongs primarily to that State. It will do all it can to this end, to the utmost of its own resources and, where appropriate, with any international assistance and co-operation, in particular, financial, artistic, scientific and technical, which it may be able to obtain.”*

3 The Stonehenge World Heritage Site Management Plan (WHSMP) says in Policy 1d that *“Development which would impact adversely on the WHS, its setting and its attributes of OUV should not be permitted.”*

4 The National Policy Statement for National Networks (NPSNN) in paragraphs 5.131.and 5.132 recognises that World Heritage Sites (WHS) are heritage assets of the highest significance and that substantial harm to them should be “wholly exceptional”.

5 The National Planning Policy Framework (NPPF) specifically refers to World Heritage Sites in section 16. “Conserving and enhancing the historic environment”:

*“184. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.”*

*“194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*

*a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*

*b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”*

- 6 Clearly the effects of the proposed highway engineering works within, and adjacent to, the WHS require a proper recognition of its status. That this should be so is recognised in the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3). See GLVIA3 5.21 and 5.45 for reference to internationally acclaimed landscapes.

## **Landscape**

- 7 The synthesis of the Statement of Outstanding Universal Value for the WHS (WHSMP, p. 26ff.) explicitly refers to interrelated monuments and their associated landscapes. The WHS designation is not only an archaeological and cultural designation but were it to be designated now it would be specifically a cultural landscape designation (see WHSMP, para. 2.2.3). With respect to the consideration of landscape and visual effects it is clearly an internationally valued landscape.

*“The World Heritage property Stonehenge, Avebury and Associated Sites is internationally important for its complexes of outstanding prehistoric monuments. Stonehenge is the most architecturally sophisticated prehistoric stone circle in the world, while Avebury is the largest. Together with inter-related monuments, and their associated landscapes, they demonstrate Neolithic and Bronze Age ceremonial and mortuary practices resulting from around 2000 years of continuous use and monument building between circa 3700 and 1600 BC. As such they represent a unique embodiment of our collective heritage.”*

And

*“There is an exceptional survival of prehistoric monuments and sites within the World Heritage property including settlements, burial grounds, and large constructions of earth and stone. Today, together with their settings, they form landscapes without parallel. These complexes would have been of major significance to those who created them, as is apparent by the huge investment of time and effort they represent. They provide an insight into the mortuary and ceremonial practices of the period, and are evidence of prehistoric technology, architecture and astronomy. The careful siting of monuments in relation to the landscape helps us to further understand the Neolithic and Bronze Age.”*

- 8 Interim Advice Note 135/10 (IAN135) says at 2.3 that *“It should also be noted that ‘Landscapes are considerably more than just the visual perception of a combination of landform, vegetation cover and buildings – they embody the history, land use, human culture, wildlife and seasonal changes of an area. These elements combine to produce distinctive local character and continue to affect the way in which the landscape is experienced and valued. However, the landscape is also dynamic, continually evolving in response to natural or man-induced processes’ (See GLVIA para 2.3).*

### **Landscape and Visual Effects Methodology in the Environmental Statement (ES)**

- 9 There is a lack of consistency between various tables with three levels of classification and others with four. The classification in the geographical value criteria in Table 7.2.1, in ES Appendix 7.2 LVIA Methodology, fails to include internationally valued landscapes, such as obviously the World Heritage Site.
- 10 This results in a lack of a “very high” classification in the table of landscape value criteria in Table 7.2.2, in ES Appendix 7.2 LVIA Methodology, when it should be there if the international value of the World Heritage Site had been correctly recognised in Table 7.2.1 in the ES. Furthermore, it appears from consideration of the criteria in Box 5.1 of GLVIA3 that aspects of the value of the landscape have not been properly taken into account when these would justify a “very high” classification of landscape value. The condition of the Stonehenge World Heritage Site landscape is improving thanks to the efforts of the National Trust and others. The scenic quality is high as shown by the numerous artists who have depicted it. The rarity of the Stonehenge landscape is internationally recognised. The landscape does contain a particular character and elements that are considered particularly important examples. There are features of archaeological, historical and cultural interest that add to the value of the landscape as well as having value in their own right. The World Heritage Site is valued for recreation where experience of the landscape is important. The landscape of the World Heritage Site is valued for its perceptual qualities. In addition, the Stonehenge landscape is valued because of its association with particular people and events in history that contribute to perceptions of the natural beauty of the area. It has also inspired many artists (see ES Appendix 6.1 Annex 7). It is also important

to note that the list in Box 5.1 'is not comprehensive and other factors may be considered important to specific area' (GLVIA3 para. 5.28 first bullet).

- 11 It would be logical to also include a very high classification of landscape sensitivity in Table 7.2.3 in the ES to recognise the international special geographical value and consequent very high landscape value of the World Heritage Site.
- 12 This should flow through to Table 7.2.4 in the ES. The high sensitivity classification relates to a landscape of national and regional value. Because the World Heritage Site is internationally valued it should be placed in a very high landscape sensitivity classification.
- 13 Similarly the classification of visual geographic value also fails to recognise that the WHS is essentially an internationally designated landscape. There is a failure to include either a national or international classification in Table 7.2.5 in the ES.
- 14 This of course feeds through to subsequent tables. Table 7.2.6 on visual value again fails to recognise that the World Heritage Site is an internationally designated and valued landscape. There should be an additional classification with a very high visual value for views of and within the World Heritage Site of the "interrelated monuments and their associated landscapes".
- 15 Table 7.2.7 in the ES deals with the susceptibility of people as visual receptors and is separate from the site itself.
- 16 An entire level of classification has been omitted from the tables discussed above and this has clear implications for the consideration of the magnitudes and significance of effects. This is not just any landscape or any project, but a development which involves very large-scale engineering in an internationally valued landscape. It cannot be argued that this does not matter and that the method complies with IAN135 because it is quite clear in IAN135 at, for example, 3.8 and 3.10 that the indicative criteria it contains are not prescriptive and that evaluation methodology must be based on the specific circumstances. At 5.29 with regard to assessing landscape effects GLVIA3 says that "*There cannot be a standard approach as circumstances will vary from place to place.*"

- 17 With regard to magnitudes of effects it should also be noted that at 3.27 paragraph 2 GLVIA3 says that “*Word scales, ideally with three or four but a maximum of five categories, are preferred as the means of summarising judgements for each of the criteria.*” While three categories may be satisfactory for the average site it cannot be appropriate here where international recognition of the landscape must be taken into account.
- 18 It follows from the lack of appropriate value being placed on the World Heritage Site that the assessment of effects will have been unjustifiably down-played.

There is a further discrepancy between the classifications of magnitudes for landscape and visual effects and how this is translated into significance. ES Table 7.2.9 for the magnitudes of landscape effects uses four positive and four negative levels of magnitude plus no change while four levels plus no change are shown in ES Table 7.2.10 for visual effects. However, when the significance of effects are considered at ES Table 7.2.11 only three levels of sensitivity have been applied. This compounds the failure to properly take into account the international value placed on the WHS and further plays down the impacts of the proposed development.

### **Landscape Receptors considered in the ES**

- 19 There seems to have been only a cursory attempt to describe effects resulting from the proposed major engineering works on landscape receptors. The tables describing landscape effects do not explain in any detail which landscape receptors have been considered. This is however an essential part of the process of carrying out an assessment of the landscape effects of any proposed development. There appears to be no proper recognition of the important interrelation between monuments in the WHS landscape. Indeed, the only landscape characteristic that appears to be taken into account is that this is an open and rolling landscape with few hedges.
- 20 There is more to this landscape than that, which is why it has an international designation recognising its outstanding universal value. For example, the WHSMP identifies some key characteristics of the landscape at 2.2.18: “*Typically, much of the WHS is an open landscape in which the sky dominates. The undulating landform, with large fields bounded by fences and long distant views of plantations, clumps of trees, roads and upstanding archaeological features are the most distinctive*

*characteristics of the downland plateau landscapes within the WHS. The general absence of hedgerows and buildings is also a notable feature.”*

- 21 More importantly at 8.3.7 the WHSMP says *“The main pressures on the landscape continue to include development and changes in land use which can alter or even destroy these often subtle, but important visual and contextual relationships. Such relationships are in themselves attributes of the OUV of the WHS. Improved understanding of these relationships enhances enjoyment of a visit to the WHS as a whole, rather than limiting experience to key monuments such as the Henge at Avebury and the Stones at Stonehenge and a few set-piece viewpoints.”* These subtle but important contextual relationships appear to have been completely overlooked in the LVIA.

### **Viewpoints considered in the ES**

- 22 Viewpoints appear to have been selected to be relatively representative, but certainly do not take into account all views, or those with the largest potential effects. For example, a viewpoint closer to the A303 at the Longbarrow Cross Roads side of the WHS does exist and would show more of the new road.
- 23 No viewpoints have been considered along the line of the proposed permissive byway. People could – and I have done so – walk along the A303 to see how the monuments in the landscape relate to one another. Although the numbers of people concerned as visual receptors may be small at present, proximity to the new cuttings and portals will have a very large influence on how people using the new byway in the future experience the WHS and this must be taken into account. There will be views of the new road from green bridge 4, which don't appear to be acknowledged. The verges of the A303 as it exists at present are publicly accessible viewpoints which should have been taken into account. This is a serious defect in the LVIA
- 24 Similarly, the A303 itself is a publicly accessible viewpoint and there will be visual effects on people travelling along it. It is very well known that many people look forward to seeing Stonehenge as they pass by and that many also appreciate views of the other monuments in the WHS that they can see at present from their vehicles. Such people should be regarded as sensitive visual receptors and the effects upon them must be properly considered.

- 25 Guided tours to the landscape of Stonehenge take people to many of the monuments. Because those people are there to experience and understand the landscape with its interrelated monuments, they are particularly sensitive receptors. The selected viewpoints do not seem to take this into account.
- 26 The WHSMP says at Policy 4c – “*Encourage access and circulation to key archaeological sites within the wider WHS landscape. Maintain appropriate arrangements for managed open access on foot within the WHS (taking into account archaeological, ecological and community sensitivities) to increase public awareness and enjoyment.*”
- 27 Clearly more areas could be visited by the public who would be particularly sensitive receptors if they were there to explore and appreciate the WHS landscape. The selection of viewpoints in the LVIA appears to be based on existing public rights of way without taking into account views from other present and future publicly accessible areas.

### **Specific effects**

- 28 The WHSMP says at page 29 that “*The A303 continues to have a negative impact on the setting of Stonehenge, the integrity of the property and visitor access to some parts of the wider landscape.*”
- 29 Although the traffic on the A303 is distracting it is possible to understand the route the road takes over the surface of the land over most of the width of the WHS as a development from the track shown in Stukeley’s Illustration of 1740 “Prospect of Stonehenge from the East”: Viewpoint 3, ES Appendix 6.1 Annex 7, page 13, but this was possibly along an ancient trackway which has existed for hundreds and possibly thousands of years. It is a part of the landscape and appears in other antiquarian illustrations of Stonehenge, such as John Constable and David Lucas’ 1855 mezzotint: Viewpoint 2. ES Appendix 6.1, Appendix 7, page 33.
- 30 In future people will be aware of the very large scale of the engineering works for the cuttings at either end of the tunnel and of course the very large scale of the new junction west of the existing Longbarrow Crossroads.

31 Insufficient weight appears to have been given to the effects of the proposed scheme adjacent to the western edge of the WHS. The WHSMP says at paragraph 8.3.1 that *“The setting of the WHS is characterised by a rolling open landscape which is particularly sensitive to development.”*

32 The LVIA (ES Chapter 7) says at 7.7.3 that *“Beneficial change to the landscape and visual receptors during the operational phase would result from:*

*c) removing or downgrading the physical and visual impact of the existing A303 within the WHS, so as to physically and visually reconnect the landscape within the WHS”*

33 This is misleading and incorrect and fails to properly acknowledge the adverse effects of the cuttings and tunnel portals. The section of the A303 put out of view in a tunnel does not mitigate the significant adverse landscape effects elsewhere and cannot be regarded as offsetting those adverse effects. They must be fully acknowledged in paragraph 7.7.4 but have not been.

34 The cuttings will be new large-scale structures and linear features in a highly valued landscape. Rounding off the top of the banks will not mitigate their landscape effects as new features in a world acclaimed historic landscape. This measure may help reduce visual effects but won't apply to landscape effects. There is a confusion between landscape and visual effects in the LVIA in that the landscape effects are on the landscape resource and affect landscape receptors, not people who are visual receptors.

The cuttings and other engineered features of the proposed changes to the A303 within the WHS would be a very large and irreversible alteration from the existing situation and would introduce significant features into the landscape which have never existed in it before.

35 There seems to have been only a cursory attempt to describe effects resulting from the proposed major engineering works on landscape receptors. The tables describing landscape effects do not explain in any detail which landscape receptors have been

considered. GLVIA3 is quite explicit in paragraph 8.10 that tables should only be used to supplement narrative descriptions

- 36 The proposed tunnel only crosses about 60 per cent of the WHS. It is stretching the use of the term to call it the majority of the WHS when it is just a bit over half the width.
- 37 Nevertheless the LVIA (ES Chapter 7) states at 7.9.32 *“The tunnel would physically remove the A303 from the majority of the WHS, as well as substantially reduce the visual presence of vehicles within the WHS. The removal of the existing A303 would enable the physical and visual reconnection of land that is currently severed by the existing A303, as well as restoring the landscape pattern within the WHS. The tunnel would also enable the former A303 to become a restricted byway, increasing the opportunity for recreational access within the WHS.”*
- 38 The LVIA at paragraph 7.3.16 says *“h) Likely beneficial effects during the operational phase included beneficial change to the existing landscape and visual context as a result of sections of the Scheme being in cutting and in tunnel, balanced with adverse effects from additional highways infrastructure and grade separated junctions.”*
- 39 This is NOT the approach described in GLVIA3. Adverse and beneficial effects should be described separately. They do not balance out in the way suggested.
- 40 At least at LVIA (ES Chapter 7) paragraph 7.9.45 this is acknowledged to some extent when it says that *“However, the impact to the landform within the WHS would be adverse; due to the cutting approach to the western portal and between the eastern portal and Countess Roundabout.”*
- 41 The new cutting approaches to the tunnel portals would be major new intrusive elements within the WHS. No mitigation has been proposed nor could any be effective in reducing the adverse landscape effects of these massive engineered features.
- 42 The new Longbarrow Junction on the edge to the WHS is of such a scale that it too would have a significant adverse landscape effect and of course it would have an effect on the perception of the area for anyone visiting the WHS via that junction.

- 43 These massive road cuttings do not fit the context described in most of the landscape characterisations as open rolling downland.
- 44 The WHS landscape contains significant linear earthworks forming part of the prehistoric landscape. Adding huge new linear earthworks to that landscape does not respect or enhance it and will dilute the impression created by the much more subtle prehistoric earthworks. They may well be at a distance from the cuttings, but since one of the claims made for the road scheme is that it is intended to reunite the WHS landscape and enable people to experience it more fully than an awareness of the cuttings (and tunnel portals) will affect how those seeking to understand the whole WHS landscape perceive it.
- 46 The LVIA (ES Chapter 7) claims at paragraph 7.9.58 that *“The Scheme responds positively to the NCA Statements of Environmental Opportunity by:*  
*a) enhancing the WHS landscape through the removal of the existing A303, new landscape connectivity and recreational opportunity”*
- 47 However the scheme does NOT remove the A303 from the WHS landscape – only from part of it and the cuttings and portals will be obvious to visitors who seek to explore and understand the relationship between monuments in the WHS landscape.
- 48 The LVIA (ES Chapter 7) also claims at paragraph 7.9.65 that *“By year 15, the completed earthworks, in combination with the establishment of chalk grassland and unrestricted agricultural use, would be integrated into the existing landform”.*
- 49 This is nonsense. The adverse effects of the cuttings would remain and since no effective mitigation is proposed or could exist the effects would not be diminished. Even if people became accustomed to the new road its adverse landscape effects would persist.
- 50 Similarly, at paragraph 7.9.68 the LVIA (ES Chapter 7) it says that *“The scale of Longbarrow Junction and its traffic lights would be lessened by the establishment of the tree planting bordering the junction, along with the extent of hedgerows adjacent to Longbarrow cutting west.”*

- 51 The scale of the junction would of course NOT be diminished by planting. There would be some softening of its impact, but it would still be a very large highway structure imposed on an open rolling downland landscape.
- 52 The LVIA (ES Chapter 7) says at paragraph 7.9.69 that “*The establishment of the chalk grassland adjacent to the cutting approach to the western portal would reduce the perception of the cutting and the transition from the wider landscape to the retained cut.*”
- 53 Chalk grassland is of course a valuable habitat, but to suggest that what really would be a thin coat of greenwash will reduce the landscape effect of this cutting is laughable. Landscape is about much more than visual perception, as set out at para.8, above, in the quote from Interim Advice Note 135/10.
- 54 In Chapter 1 of the ES at 1.2.2 it says, “*The Scheme would resolve traffic problems and, at the same time, protect and enhance the Stonehenge, Avebury and Associated Sites World Heritage Site (“WHS”).*”
- 55 This paragraph fails to mention aspects of the proposals which are recognised in the ES as having major adverse effects on the WHS. It would not protect the whole WHS, and would only enhance part of it.
- 56 This part of Chapter 1 exposes a fundamental flaw in the analysis of both landscape and visual effects – it is not correct to simply dismiss all adverse effects and only mention beneficial effects in order to present a development in the best light.

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