SEAS DEADLINE 6 RESPONSE to APPLICANTS's SUBMISSIONS SINCE DEADLINE 5, ISH3, Action Points and ExQ3 LANDSCAPE & VISUAL and CULTURAL HERITAGE

PINS Ref: EN020026 **SEAS IP:** [redacted]
DEADLINE 6: APRIL 13, 2026 **Date:** 13 April 2026

RE: SEAS Response to Applicant's Submissions since Deadline 5, ISH3, Action Points and ExQ3 – Landscape & Visual and Cultural Heritage

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Introduction and Overview

1. SEAS welcomes and supports the Deadline 6 submission prepared by Nicholas Bridges in respect of the Sea Link DCO, which provides a detailed and technically grounded critique of the Applicant's Zone of Theoretical Visibility (ZTV) analysis.

2. SEAS Council Mr. James Burton attended the Issue Specific Hearings (ISH3) on January 25, 26 and 27 March and introduced Landscape & Visual and Cultural Heritage expert Nicholas Bridge on 26 March to speak on behalf of SEAS.

3. Mr Bridges' evidence highlights significant inconsistencies between the ZTV outputs presented at different stages of the application, and between Sea Link and comparable projects in the same location. As set out in his submission, these discrepancies raise fundamental questions regarding the reliability of the Applicant's landscape and visual assessment, and whether the Environmental Statement has properly identified and assessed likely significant effects, particularly in relation to the Suffolk & Essex Coast and Heaths National Landscape and designated heritage assets.

4. SEAS considers this work to be highly relevant to the Examination. It reinforces concerns that the current assessment may omit materially important visibility and impact considerations, especially on the southern side of the Alde estuary. In this context, SEAS supports the call for clarification, further analysis, and, where necessary, extension of the ZTV study area to ensure a robust and policy-compliant assessment. This submission should therefore be afforded substantial weight in the Examination of landscape, visual and heritage effects.

5. Please find Nicholas Bridge's written evidence below:

AI Disclosure & Responsibility Statement: This submission is human-authored and human-verified. In preparing its evidence, SEAS in some instances utilises AI tools (ChatGPT, Google Gemini, Microsoft Co-Pilot) for the summarisation of Examination Library documents and for organisational assistance. SEAS maintains full responsibility for the factual accuracy of this content.

EN020026 SEA LINK DCO – DL6: RESPONSE BY NICHOLAS BRIDGES

ZTV ANALYSIS – IP ref FA62B0DA

April 2026

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13/04/2026	1A	Draft	Internal review	NB

EN020026 SEA LINK DCO – DL6: RESPONSE BY NICHOLAS BRIDGES

ZTV ANALYSIS – IP ref [redacted]

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1. INTRODUCTION

1.1. The questions I raised about the Applicant's submitted Zone of Theoretical Visibility (ZTV) plans remain unresolved. This Deadline 6 submission provides further evidence of the inconsistency between the Sea Link ZTV and those of different applicants for similar buildings in the same locations.

1.2. It includes comparative plans which illustrate the problem. It requests the Applicant to explain why. It reiterates the consequent omission within the ES LVIA of appropriate assessment of effects on the Suffolk & Essex Coast and Heaths National Landscape (AONB) and designated heritage assets.

1.3. Comments are made here on this topic in response to the applicant's rebuttal of my previous submissions in its **[REP5-141]**, not in my separate response to the remaining matters raised.

Relevant previous documents

1.4. **[RR-3944]** Relevant Representation by Nicholas Bidges
Drew attention to Sea Link PEIR ZTV plans demonstrating visibility across the Alde estuary and onto is south side.

[OFH1 – xxx] EN02026-001727 NB Written submission

[REP3-132] ExQ1-DL3 EN020026-XXXX NB written responses to ExA's questions

[REP4-240] EN020026-002708 NB on behalf of SEAS written reps following appearance at ISH2

[REP5-141] EN020026-002931-9.128 Applicant's response to NB's Representations RR-3944 and REP3-132 and SEAS REP4-240

2. METHODOLOGY

2.1. I have produced many complex ES TVIAs with varying extents of heritage and landscape receptors. I have been tasked with the iterative process of identifying key viewpoints for visual assessments, working with visualisers, the architects, planning consultants and other disciplines contributing to the ES.

2.2. The study area is not simply a fixed distance from the proposed Site. The policy constraints have to be identified and mapped to understand their extent and importance. Once the design has evolved and options for its massing have emerged, a visualiser produces the first ZTV, which could include a variety of heights to identify potentially critical issues.

2.3. These are often tested in the CAD model and coincide with site inspections to understand the sensitivity of the receptors and potential effects.

2.4. A Long List is produced using a combination of model views and site recce photos as part of the Candidate Views Study. These are usually presented for discussion with the LPA as part of pre-apps and design development. As the project settles down, baseline photography and surveying of camera positions allows Accurate Visual Representations (AVRs) to be produced.

2.5. During the design and consultation process, officers often ask for additional viewpoints to be included as part of their assessments. My TVIA process allows for producing images, either model or wireline, to prove either invisibility or such limited visibility that no further assessment is needed. By doing this exercise before a Design Review Panel presentation or an application is submitted, the client has more certainty that this aspect of the proposal has been de-risked.

2.6. The Sea Link application does not appear to have had this approach unlike its predecessors EA1N and EA2 at Friston.

EA1N - 6.3.29.2 Appendix 29.2 LVIA Methodology, page 49

2.7. Its LVIA Methodology had a reasonable way to use ZTVs to understand what will be seen, where, and which should be investigated as potential viewpoints:

These limitations mean that while the ZTV is used as a starting point in the assessment, providing an indication of where the East Anglia ONE North and TWO substation locations will theoretically be visible, the information drawn from the ZTV is checked in the field, to ensure that the assessment conclusions represent the visibility of the East Anglia ONE North and TWO substation locations a reasonably accurately.

2.8. The Sea Link Area of Study was settled with ESC and SCC during the PEIR stage and has not been amended since. It is not clear what evidence was presented to the authorities and why they agreed to the 2km extent. In the Scoping Opinion, the ExA requested that the "*Study Area be kept under review for effects on sensitive visual receptors and it should agree with relevant consultation authorities.*"

2.9. The ZTVs of the two Friston projects and Sea Link's PEIR have a similar pattern of visibility around their projects (see **Figures 1 to 11** below). Sea Link includes the National Grid substation at Friston which each of EA1N and EA2 also included. All Projects were modelled using OS contours, woodland and buildings at a generic height. Observer heights were a little higher for EA1N and EA2. The two Friston substations used the same parameter model as Sea Link.

2.10. The 'shadow' patterns illustrate the 'shading' effects of woodland and buildings. The ZTV plans of the same proposed volumetric parameters (**Figures 12 to 17** below) show far less visibility than its PEIR ZTV plans. The accompanying textual details of the model's constraints are exactly the same (see the schedule below).

2.11. The **first question** is: why are the PEIR and DCO plans so completely different? Were the heights in the model changed? Were the shadowing criteria altered? Which is correct? If the DCO is correct, were the EA1N and EA2 ZTVs incorrect? These are simple technical points which can be explained easily.

2.12. The **second question** is: With the majority of the ZTV plans showing extensive visibility of both Friston substations (18m above ground level) and Sea Link (26m above ground level) on the south side of the Alde estuary, at high tide mark and on the 20m ridge above, why was the information on these plans not followed or commented upon?

2.13. The ExA is familiar with the AONB, heritage and natural environmental policies covering the estuary. In answer to my query why Sea Link had not checked this area for visibility and impact on assets, the applicant replied in **REP5-141**, page 8 in reply to my comments on ISH2 Agenda Item 11 (Cultural Heritage):

2.14. *This study area was determined using professional judgement and was agreed with the Local Authority and Historic England at the Scoping stage…The study is an appropriate and proportionate assessment area aimed at identifying potential significant effects to heritage assets, rather than the area from which the Suffolk Onshore Scheme would be theoretically visible. It is the Applicant's view that assets such as the Church of St. Botolph and Martello Tower CC, both located outside the study area, do not have the capacity for impacts due to the presence of the scheme within their settings*

2.15. The applicant then appraised the two listed buildings, albeit not accepting the conclusions of Norman Scarfe's detailed historical and evidential analysis, proving that the *Icanho* mentioned by Bede as the location of St. Botolph's monastery was indeed Iken.

2.16. The applicant finished:

The permanent above ground infrastructure forming part of the Suffolk Onshore Scheme would be located inland across the Alde to the north of the asset at a distance of 4.5 km at its closest extent at the proposed Friston Substation, while the Saxmundham Converter Station would be approximately 5.5 km away. The land within the site of the Friston Substation and the sites of the other elements of above ground infrastructure forming the Suffolk Onshore Scheme does not form part of the functional or visual setting of the asset, being inland of the estuary and beyond areas of intervening woodland. It is not clear whether or not the proposed above ground infrastructure would be visible from the roof of the church tower, however, this would not impede understanding of the asset's heritage value and setting within the estuary. Therefore, no impact is identified to this asset, resulting in a ***neutral*** *effect that is not significant in EIA terms.*

2.17. The applicant does not seem aware of the EA1N and EA2 ZTV plans (**Figures 1, 2 and 3** below) which show that those developments would be visible. Nor the Sea Link PEIR likewise. Visibility from the top of the church tower is not relevant as the public have no access nor is it important as a private viewing point, unlike the Martello Tower for which this use was its primary function.

2.18. The applicant's response ascribes significance of the Friston substation when it is the reverse which should be assessed. Martello Tower CCs unique and largest plan of the east coast towers was because it faced potential threats from both sea and river. I have seen the Board of Ordnance surveyor's drawings assessing all the sites as part of my research 15 years ago, which were sited precisely for the best defensive locations. The setting on the Alde has historical and architectural special interest.

2.19. The Sea Link ES LVIA decided not to extend the coverage of its ZTVs when its PEIR had already revealed visibility of the

Proposed Project from the high ground on the south side of the Alde estuary. This is an area covered by multiple statutory and non-statutory policy designations.

3. OUTSTANDING ISSUES

3.1. The submitted DCO ZTV plans should be reviewed for their accuracy.

3.2. If they are correct, the applicant must explain why the PEIR was so different

3.3. Are the ZTV plans for EA1N and EA2 correct.

3.4. There has been and is sufficient evidence available to warrant further understanding of the visibility of the proposed project on the south side of the Alde estuary.

3.5. Extend the ZTV, using the same parameters as the PEIR down to Ferry Road, Sandy Lane and Tunstall Road along the southern ridge. There are multiple gaps through which the estuary, northern side and the Sizewell pylons can be seen.

3.6. Assess the extent of the project visible using the CAD model.

3.7. Assess potential landscape, visual and heritage effects.

3.8. It is possible that the effects may not be significant. Or that the combined effects across the whole estuary are significant.

3.9. Without this analysis, there will be an omission in the Environmental Assessment which cannot be justified.

4. SCHEDULE OF SUCCESSIVE ZTV PLANS

4.1. Overview of data in each application's documents.

Planning applications									
	EN010077	**EN010078**	**EN020026**			**EN020026**			
Item	**EA1N**	**EA2**	**Sea Link**			**Sea Link**			**LionLink**
Status	**DCO**	**DCO**	**PEIR**	**PEIR**	**PEIR**	**DCO**	**DCO**	**DCO**	**PEIR**
Doc Ref	6.2.29.7 EA1N ES Figure 29.7 Onshore Substation ZTV	6.2.29.7 EA2 ES Figure 29.7 Onshore Substation ZTV	PEIR Volume 3 Part 2 Chapter 2 Figures	PEIR Volume 3 Part 2 Chapter 2 Figures	Sea Link 2023-10 PEIR Volume 3 Part 2 Chapter 4 Figures A Heritage & Landscape - ZTVs	EN020026-000339-6.4.2.1 ES Figures Suffolk Landscape and Visual Part 1 of 7	EN020026-000339-6.4.2.1 ES Figures Suffolk Landscape and Visual Part 1 of 7	EN020026-000343-6.4.2.1 ES Figures Suffolk Landscape and Visual Part 7 of 7	
Date	29/8/2019	29/8/2019	09/06/2023	15/10/2023	17/10/2023	10/02/2025			
Pages	1	1	3 to 8, 9	10, 11	24, 26	14	15	6-11	
Title			Representative viewpoint locations and screened ZTV – proposed Saxmundham converter station and SPR Friston substation (Options 1 and 2)	Proposed Project with Co-Location Converter Stations only; Proposed Project Friston Substation only; All combined (Options 3 and 4)	Designated assets within the 2km study area along with the ZTV for the Co-Location and Friston			Order Limits, Landscape & Visual Study Area	
Other Data	Landscape Character	Landscape Character	Listed Buildings	Listed Buildings	Listed Buildings				
Bldg Height – Existing			7.5m	7.5m	7.5m	7.5m	7.5m	7.5m	
Building Heights - Proposed	18m EA1N substation 16m NG substation	18m EA2 substation 16m NG substation	26m Converter Station only 18m Friston substation only Converter and Friston combined	26m Converter Stations only 18m Friston substation only Converter and Friston combined	26m Converter Station only 18m Friston substation only Converter and Friston combined	26m Converter Station only 18m Friston substation only Converter and Friston combined	18m Friston substation only 26m Converter and 6m Fromus Bridge combined Converter, Fromus Bridge, and Friston substation combined		
Fromus Bridge height	Not modelled	Not modelled	Not modelled	Not modelled	Not modelled	6m	6m	6m	
Observer eye height	2m	2M	1.6m	1.6m	1.6m	1.6m	1.6m	1.6m	
Tree height	?	?	10m	10m	10m	10m	10m	10m	
NOTES on drawings	ZTV shows higher to lower visibility based on the amount of the onshore substation and National Grid substation visible as represented by a grid of points across a 3D model representing the Rochdale Envelope of the onshore	ZTV shows higher to lower visibility based on the amount of the onshore substation and National Grid substation visible as represented by a grid of points across a 3D model representing the Rochdale Envelope of the onshore	Zone of Theoretical Visibility (ZTV) has been generated using Ordnance Survey Terrain 5 Digital Terrain Model which does not take into account the screening effects of vegetation, buildings or other structures. Existing Buildings have been incorporated into the Digital Terrain Model from OS OpenMap Local with an	Zone of Theoretical Visibility (ZTV) has been generated using Ordnance Survey Terrain 5 Digital Terrain Model which does not take into account the screening effects of vegetation, buildings or other structures. Existing Buildings have been incorporated into the Digital Terrain Model from OS OpenMap	Zone of Theoretical Visibility (ZTV) has been generated using Ordnance Survey Terrain 5 Digital Terrain Model which does not take into account the screening effects of vegetation, buildings or other structures. Existing Buildings have been incorporated into the Digital Terrain Model from OS OpenMap Local with an	Zone of Theoretical Visibility (ZTV) has been generated using Ordnance Survey Terrain 5 Digital Terrain Model which does not take into account the screening effects of vegetation, buildings or other structures. Existing Buildings have been incorporated into the Digital Terrain Model from OS OpenMap Local with an	Zone of Theoretical Visibility (ZTV) has been generated using Ordnance Survey Terrain 5 Digital Terrain Model which does not take into account the screening effects of vegetation, buildings or other structures. Existing Buildings have been incorporated into the Digital Terrain Model from OS OpenMap	Zone of Theoretical Visibility (ZTV) has been generated using Ordnance Survey Terrain 5 Digital Terrain Model which does not take into account the screening effects of vegetation, buildings or other structures. Existing Buildings have been incorporated into the Digital Terrain Model from OS OpenMap	

substation site. The ZTV does not indicate the decrease in scale that occurs with increased distance from the onshore substation. Areas of existing woodland have been masked out to compensate for limitations in the ZTV production process.	substation site. The ZTV does not indicate the decrease in scale that occurs with increased distance from the onshore substation. Areas of existing woodland have been masked out to compensate for limitations in the ZTV production process.	assumed height of 7.5m. Woodland from National Forest Inventory has also been incorporated into the Digital Terrain Model with an assumed height of 10m. The ZTV is based about a set of Fishnet points produced at 20m intervals, as well as 20m interval points around the edges of the Converter Station at a height of 26m, with an observer eye height of 1.6m. All heights mentioned above are above ground level (AGL) unless otherwise specified. 1 - See Part 2, Chapter 2, Landscape and Visual for further information.	Local with an assumed height of 7.5m. Woodland from National Forest Inventory has also been incorporated into the Digital Terrain Model with an assumed height of 10m. The ZTV is based about a set of Fishnet points produced at 20m intervals, as well as 20m interval points around the edges of the Colocation Converter Stations (only one subject to this application) and Proposed Friston Substation footprints, at a height of 26m for the Colocation Converter Stations and 18m for Proposed Friston Substation, with an observer eye height of 1.6m. All heights mentioned above are above ground level (AGL) unless otherwise specified. 1 - See Part 2, Chapter 2, Landscape and Visual for further information.	assumed height of 7.5m. Woodland from National Forest Inventory has also been incorporated into the Digital Terrain Model with an assumed height of 10m. The ZTV is based about a set of Fishnet points produced at 20m intervals, as well as 20m interval points around the edges of the Colocation Converter Stations (only one subject to this application) and Proposed Friston Substation footprints, at a height of 26m for the Colocation Converter Stations and 18m for Proposed Friston Substation, with an observer eye height of 1.6m. All heights mentioned above are above ground level (AGL) unless otherwise specified. 1 - See Part 2, Chapter 2, Landscape and Visual for further information.	assumed height of 7.5m. Woodland from National Forest Inventory has also been incorporated into the Digital Terrain Model with an assumed height of 10m. The ZTV is based about a set of Fishnet points produced at 20m intervals, as well as 20m interval points around the edges of the Converter Station and Fromus Bridge footprints, at a height of 26m (above a platform of 3.5m AOD) for the Converter Station, and 6m for Fromus Bridge, with an observer eye height of 1.6m. All heights mentioned above are above ground level (AGL) unless otherwise specified. 1 - See Part 2, Chapter 1, Landscape and Visual for further information.	Local with an assumed height of 7.5m. Woodland from National Forest Inventory has also been incorporated into the Digital Terrain Model with an assumed height of 10m. The ZTV is based about a set of Fishnet points produced at 20m intervals, as well as 20m interval points around the edges of the Converter Station, Substation and Fromus Bridge footprints, at a height of 26m for the Converter Station and 18m for the Substation (above a platform of 3.5m AOD), and 6m for Fromus Bridge, with an observer eye height of 1.6m. All heights mentioned above are above ground level (AGL) unless otherwise specified. 1 - See Part 2, Chapter 1, Landscape and Visual for further information.	Local with an assumed height of 7.5m. Woodland from National Forest Inventory has also been incorporated into the Digital Terrain Model with an assumed height of 10m. The Sea Link ZTV is based about a set of Fishnet points produced at 20m intervals, as well as 20m interval points around the edges of the Converter Station and Fromus Bridge footprints, at a height of 26m (above a platform of 3.5m AOD) for the Converter Station, and 6m for Fromus Bridge, with an observer eye height of 1.6m. The Cumulative Scheme ZTV is based about a set of Fishnet points produced at 20m intervals, as well as 20m interval points around the edges of the provided Footprints, with an observer eye height of 1.6m and the below input heights: - Sizewell C: Varying input heights - see Figure 6.4.2.1.11a for information - East Anglia ONE North & East Anglia TWO: 18m - LionLink: 26m All heights mentioned above are above ground level (AGL) unless otherwise specified. 1 - See Part 2, Chapter 1, Landscape and Visual for further information.

PEIR DRAWINGS

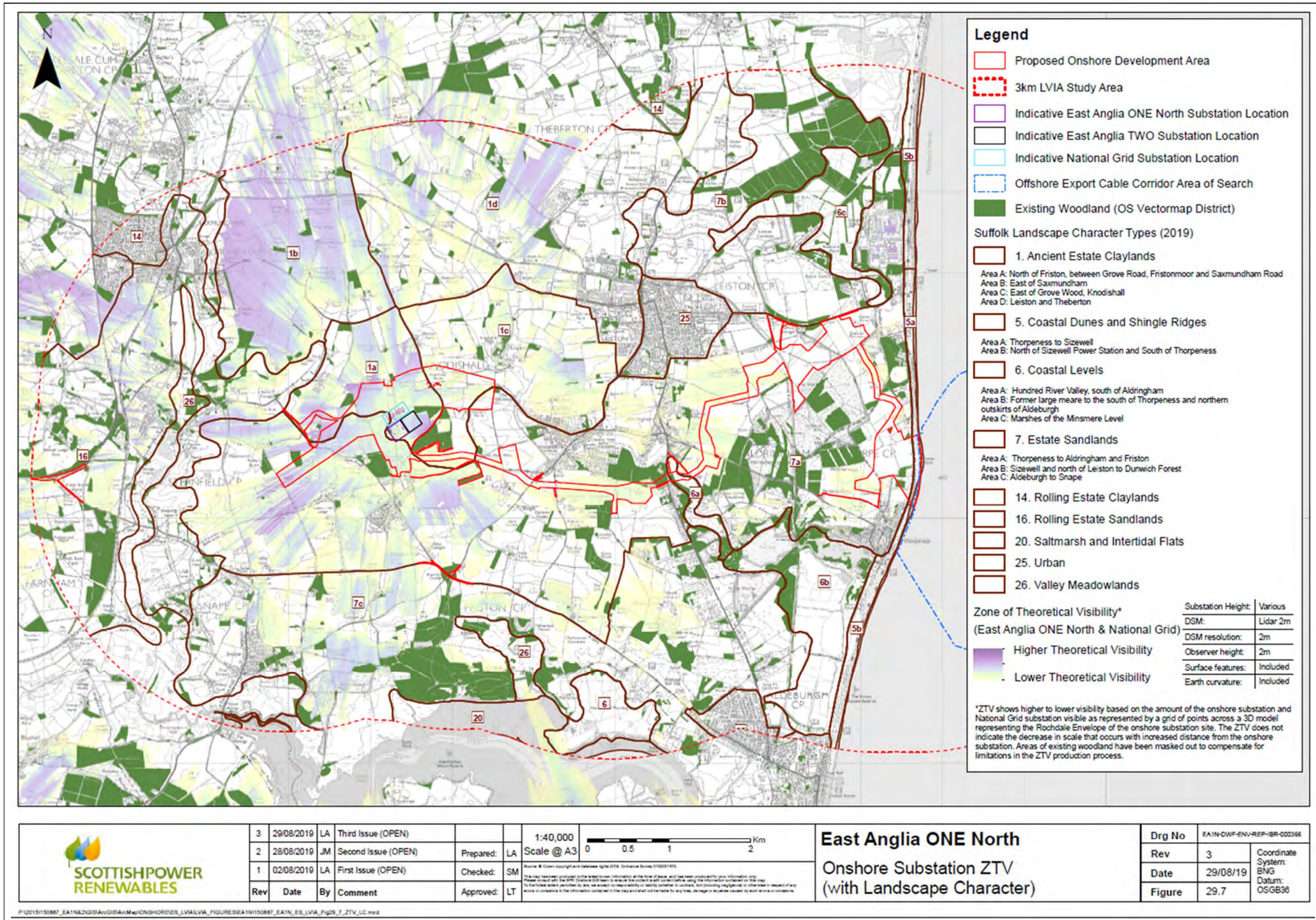

Figure 1. EN010077-001489-6.2.29.7 EA1N ES Figure 29.7 Onshore Substation ZTV (with landscape character)

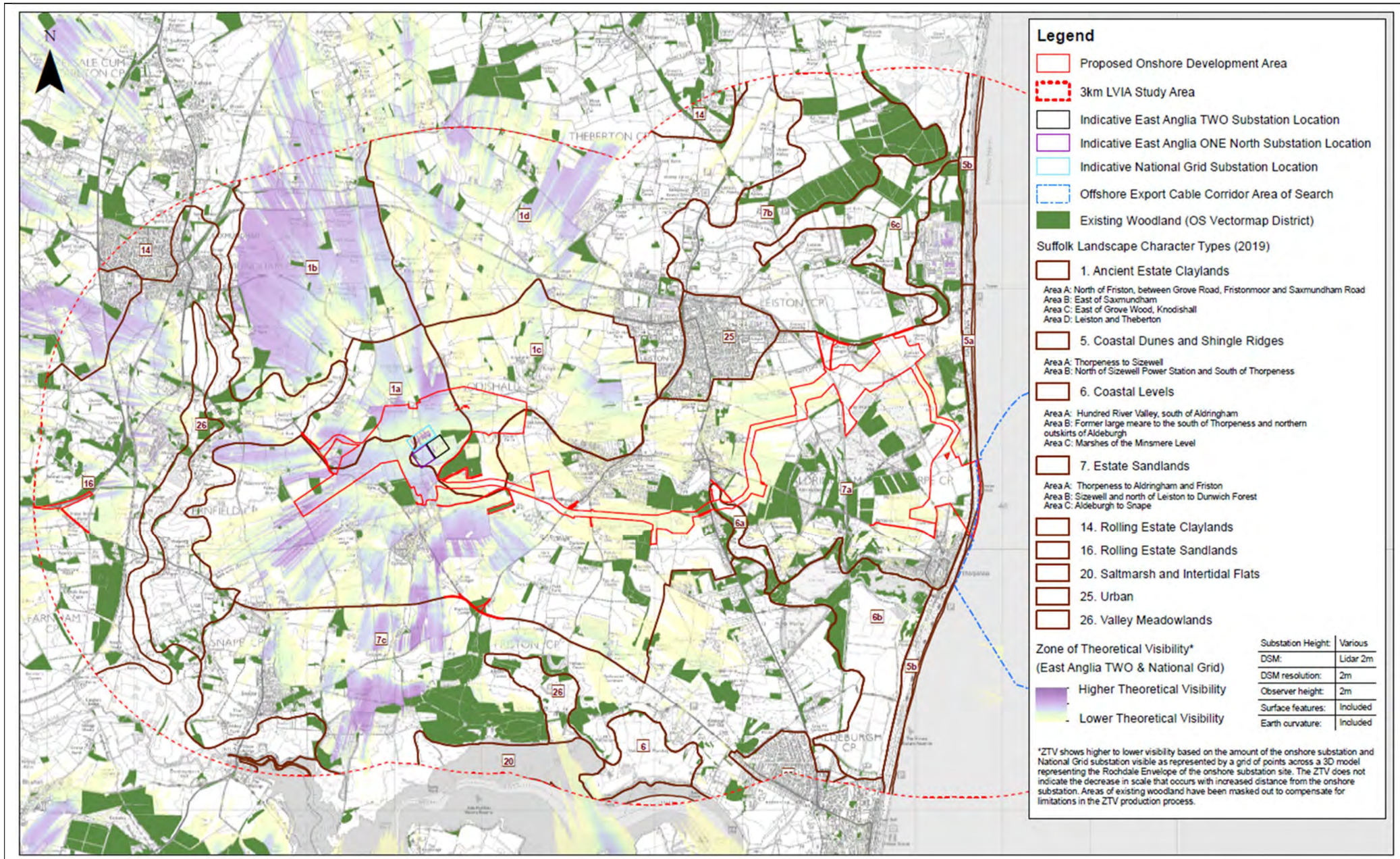

Figure 2. EN010078-001425-6.2.29.7 EA2 ES Figure 29.7 Onshore Substation ZTV (with landscape character)

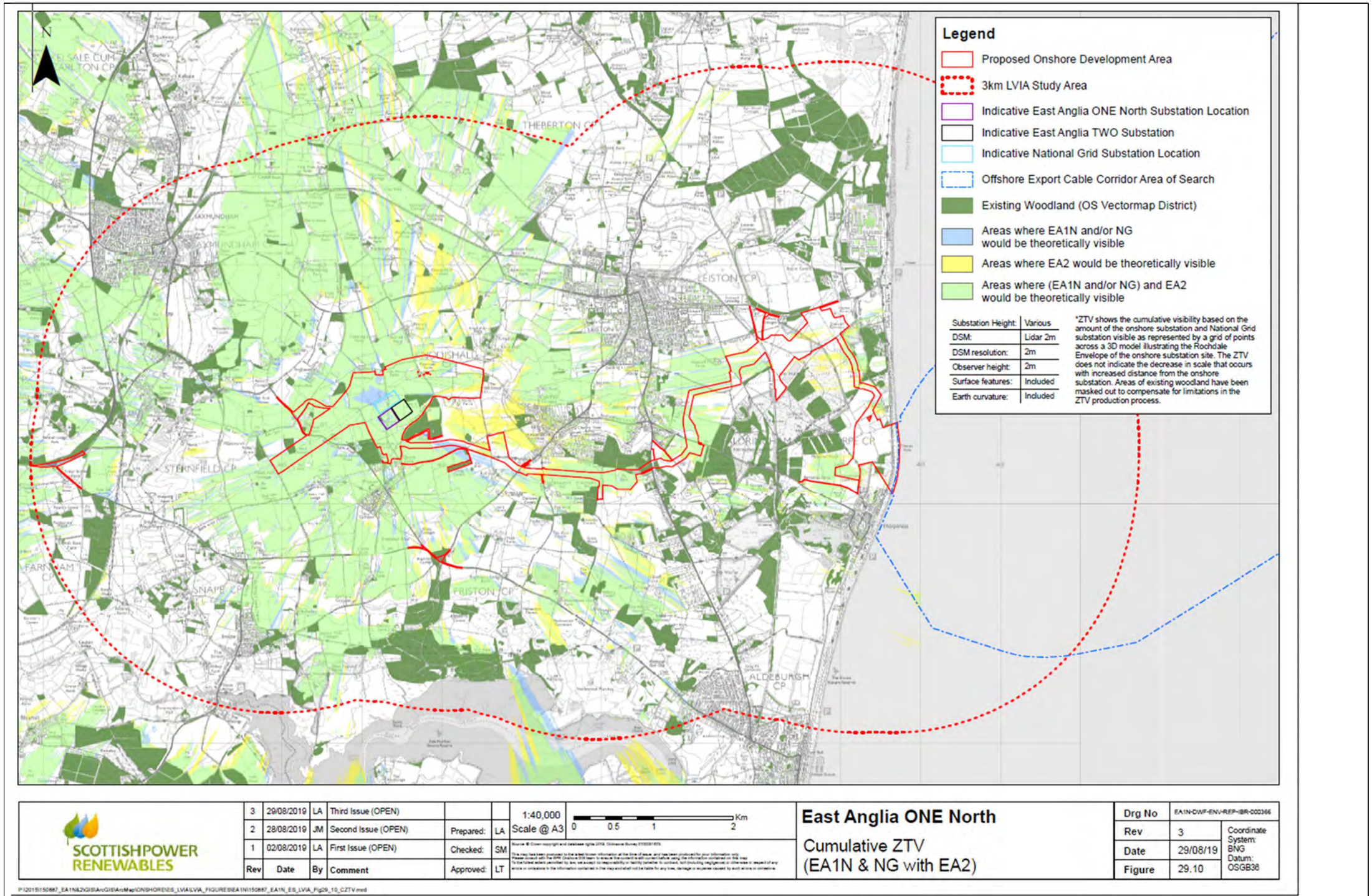

Figure 3. EN010077-001492-6.2.29.10 EA1N ES Figure 29.10 Onshore Substation Cumulative ZTV with National Grid and EA2

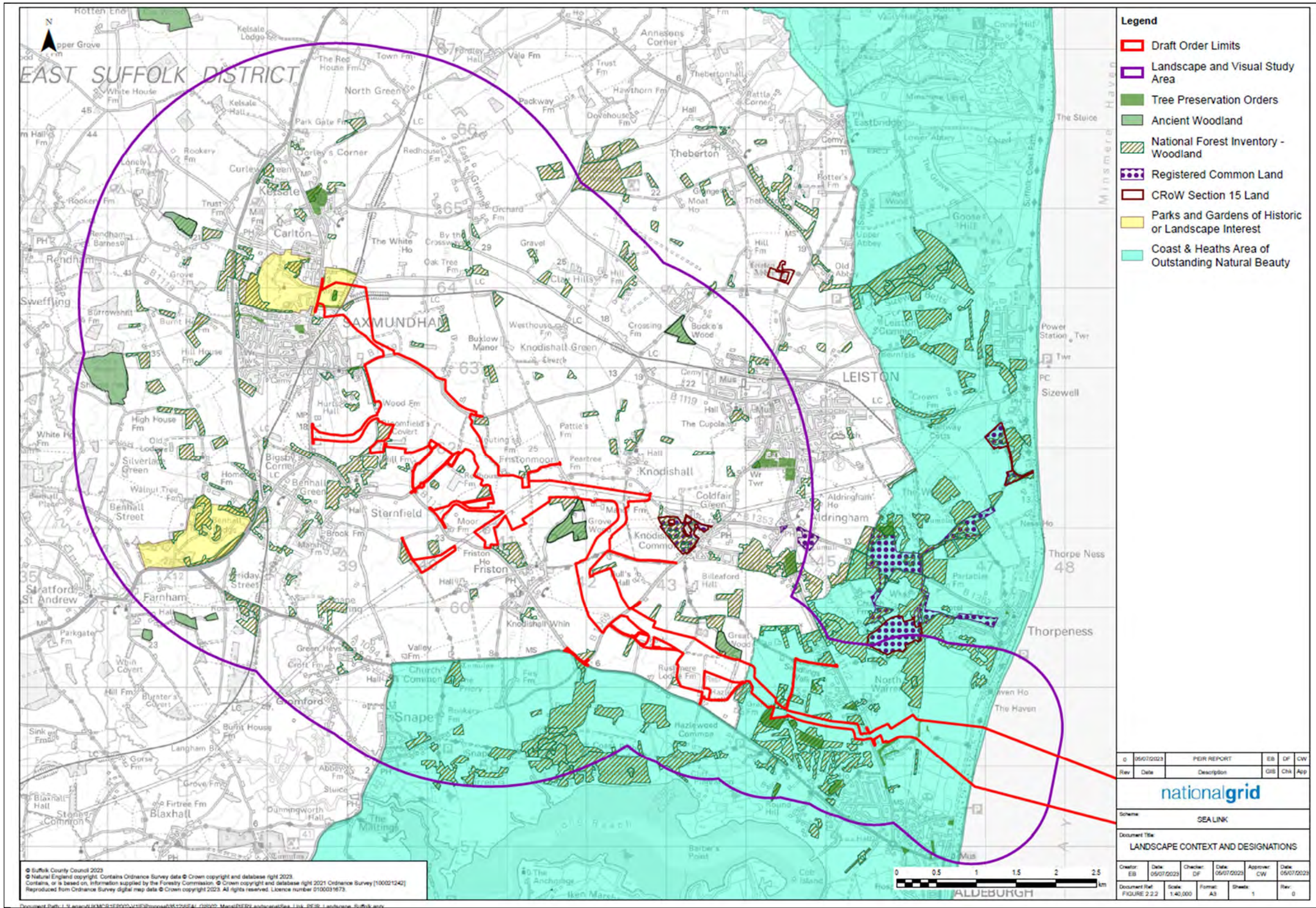

Figure 4.Sea Link 2023-10 PEIR Volume 3 Part 2 Chapter 2 Figures A, page 2:

LANDSCAPE CONTEXT AND DESIGNATIONS

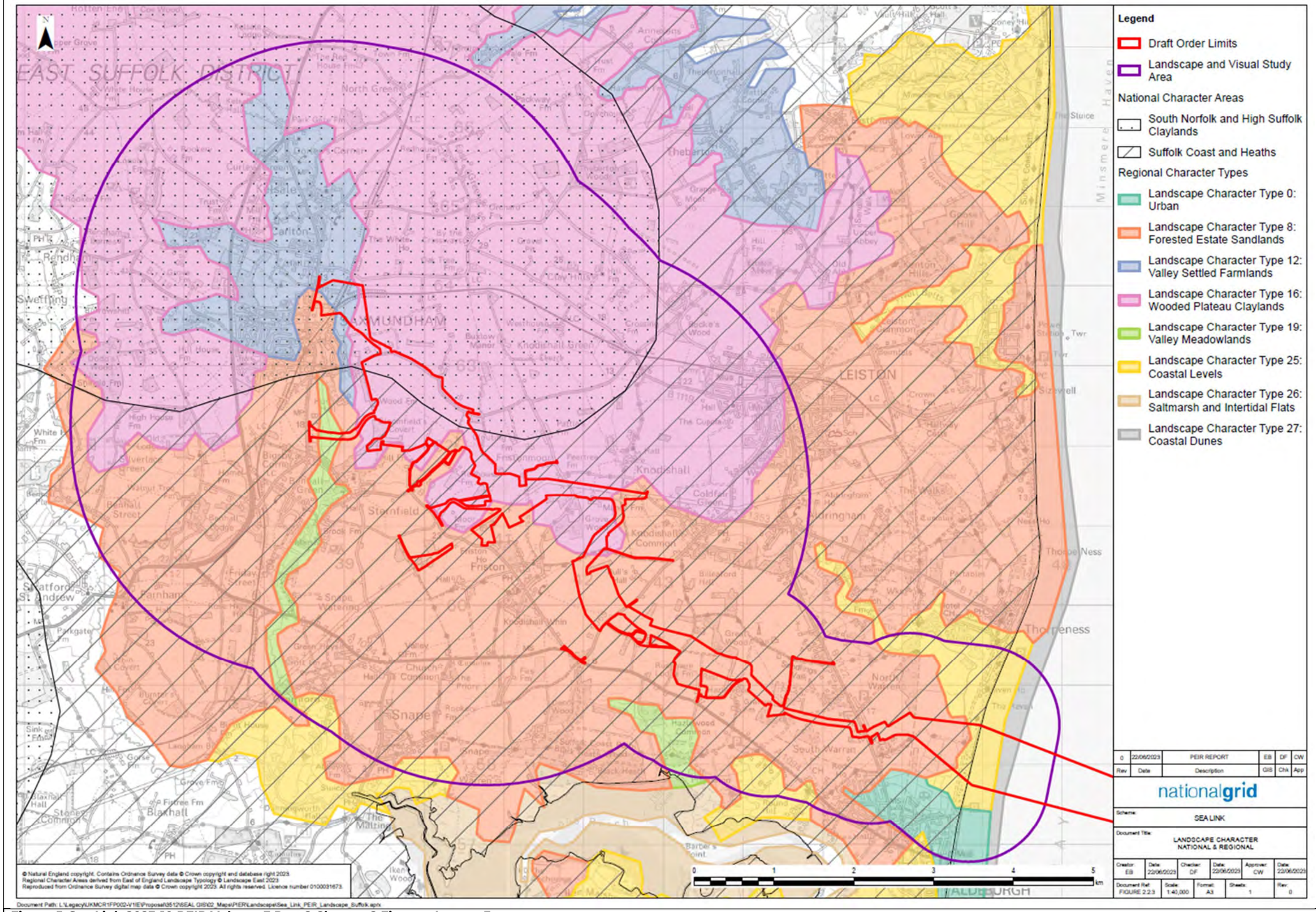

Figure 5. Sea Link 2023-10 PEIR Volume 3 Part 2 Chapter 2 Figures A, page 3:
LANDSCAPE CHARACTER NATIONAL AND REGIONAL

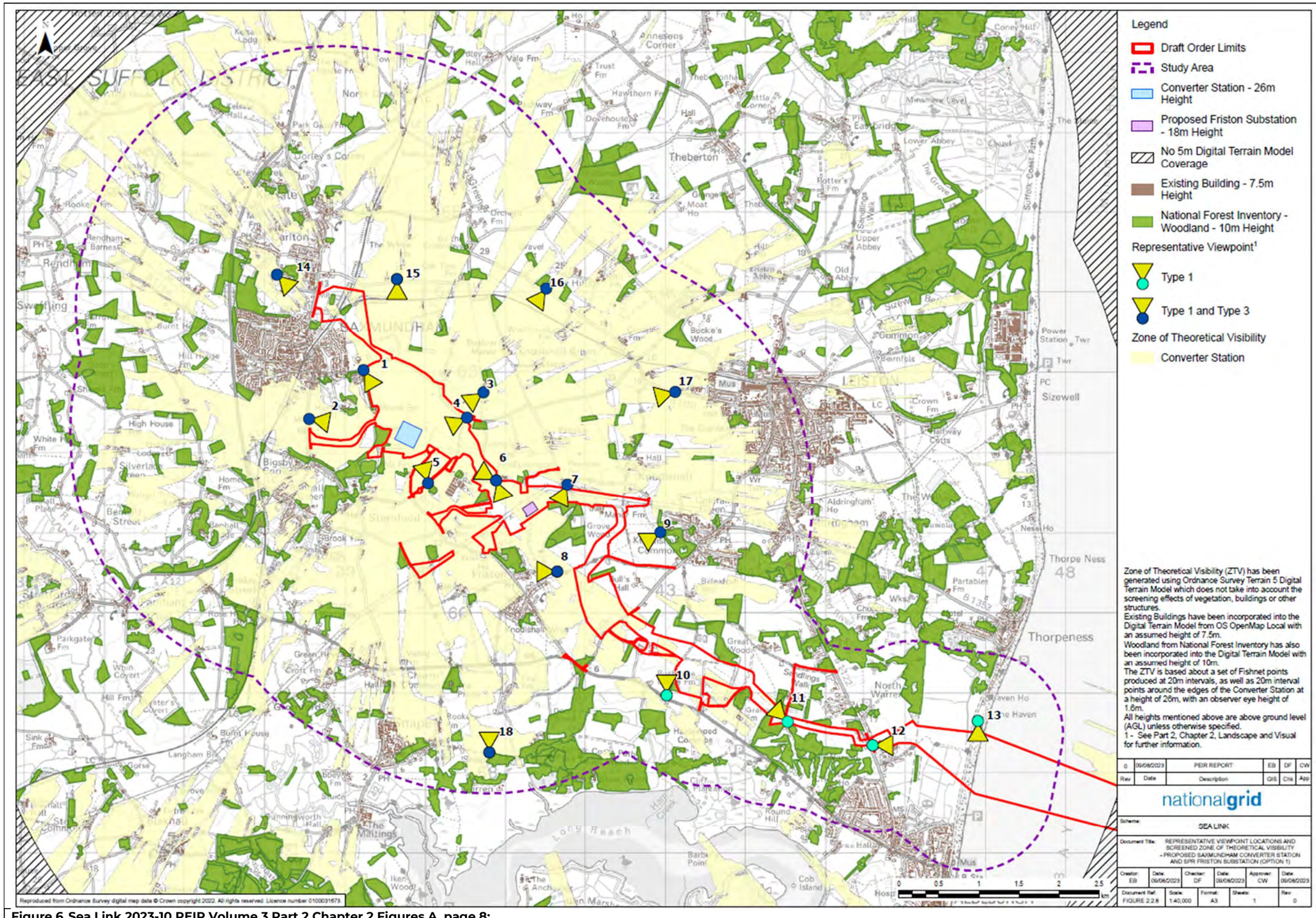

Figure 6. Sea Link 2023-10 PEIR Volume 3 Part 2 Chapter 2 Figures A, page 8:
REPRESENTATIVE VIEWPOINT LOCATIONS AND SCREENED ZONE OF THEORETICAL VISIBILITY - PROPOSED SAXMUNDHAM CONVERTER STATION AND SPR FRISTON SUBSTATION (OPTION 1)

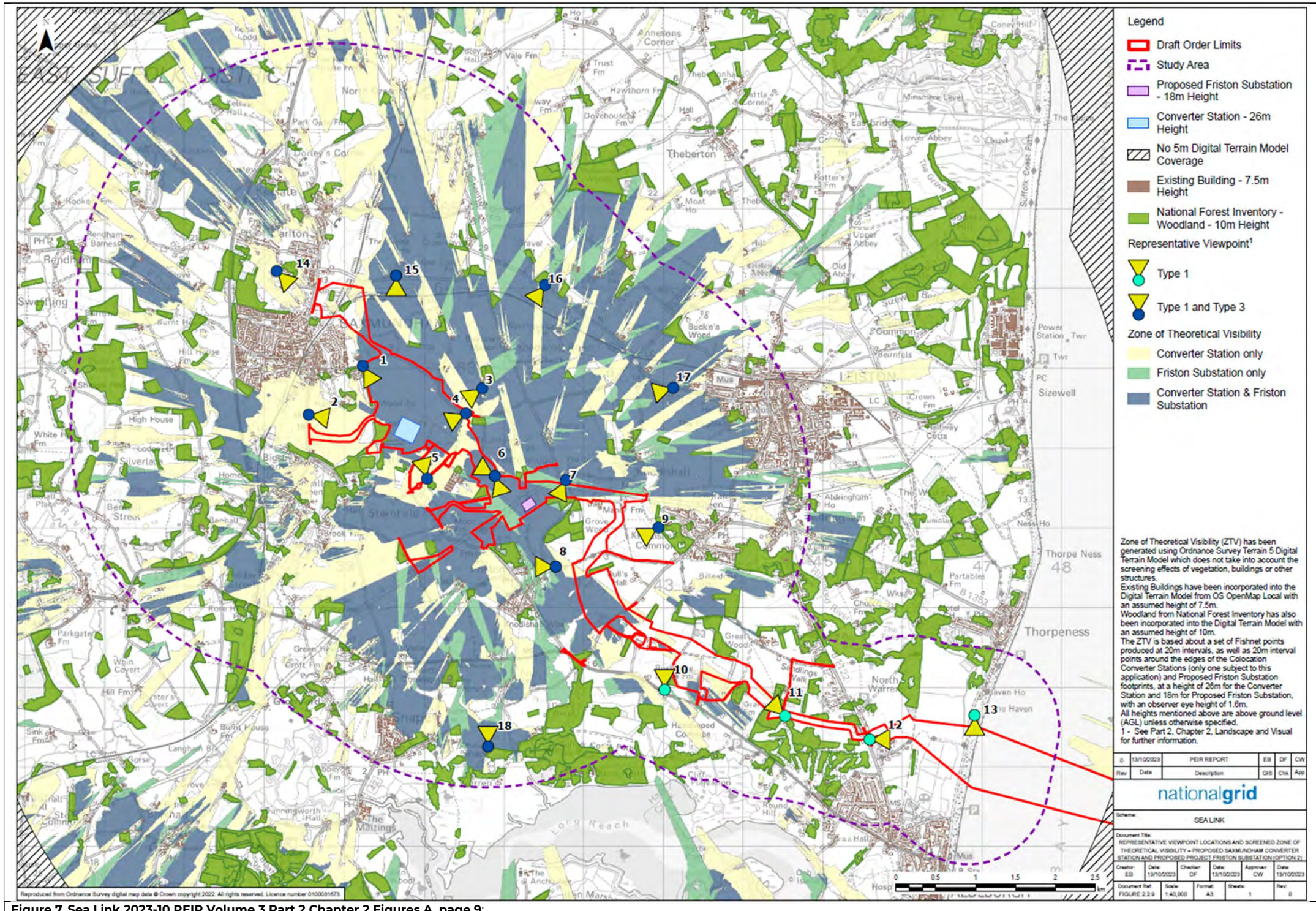

Figure 7. Sea Link 2023-10 PEIR Volume 3 Part 2 Chapter 2 Figures A, page 9:
REPRESENTATIVE VIEWPOINT LOCATIONS AND SCREENED ZONE OF THEORETICAL VISIBILITY - PROPOSED SAXMUNDHAM CONVERTER STATION AND SPR FRISTON SUBSTATION (OPTION 2)

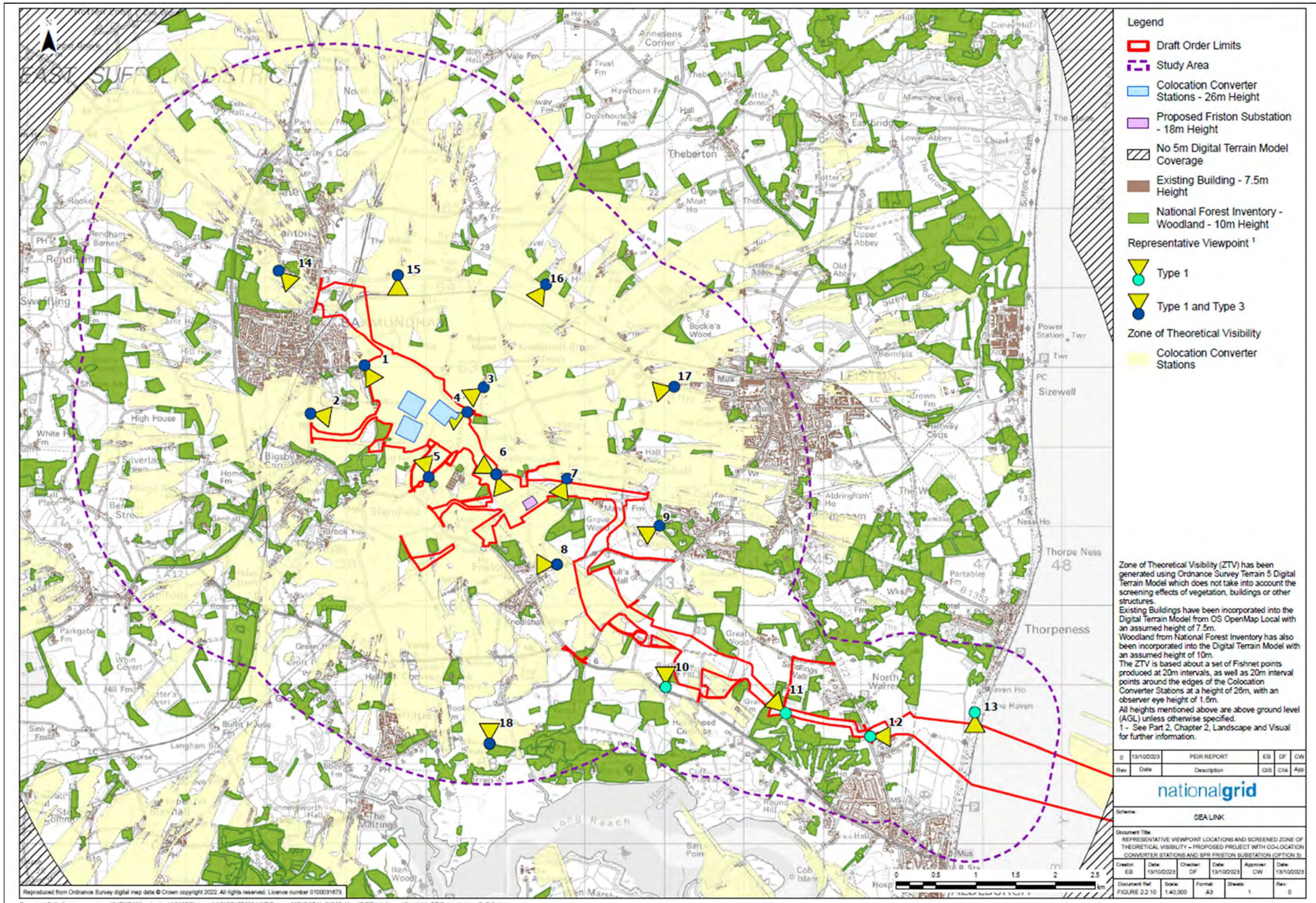

Figure 8. Sea Link 2023-10 PEIR Volume 3 Part 2 Chapter 2 Figures A, page 10:
REPRESENTATIVE VIEWPOINT LOCATIONS AND SCREENED ZONE OF THEORETICAL VISIBILITY - PROPOSED PROJECT WITH CO-LOCATION CONVERTER STATIONS AND SPR FRISTON SUBSTATION (OPTION 3)

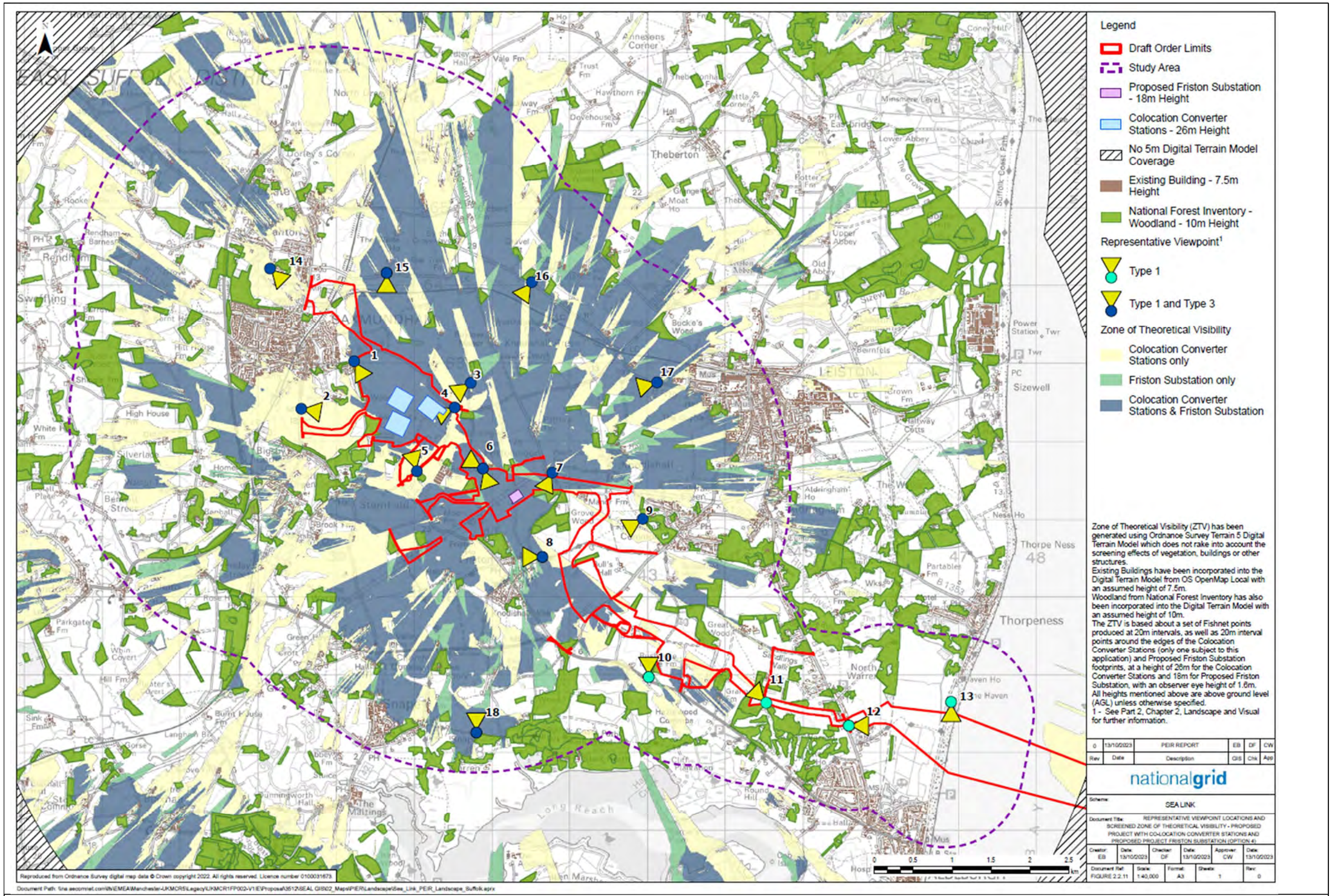

Figure 9. Sea Link 2023-10 PEIR Volume 3 Part 2 Chapter 2 Figures A, page 11:
REPRESENTATIVE VIEWPOINT LOCATIONS AND SCREENED ZONE OF THEORETICAL VISIBILITY - PROPOSED PROJECT WITH CONVERTER STATIONS AND SPR FRISTON SUBSTATION (OPTION 4)

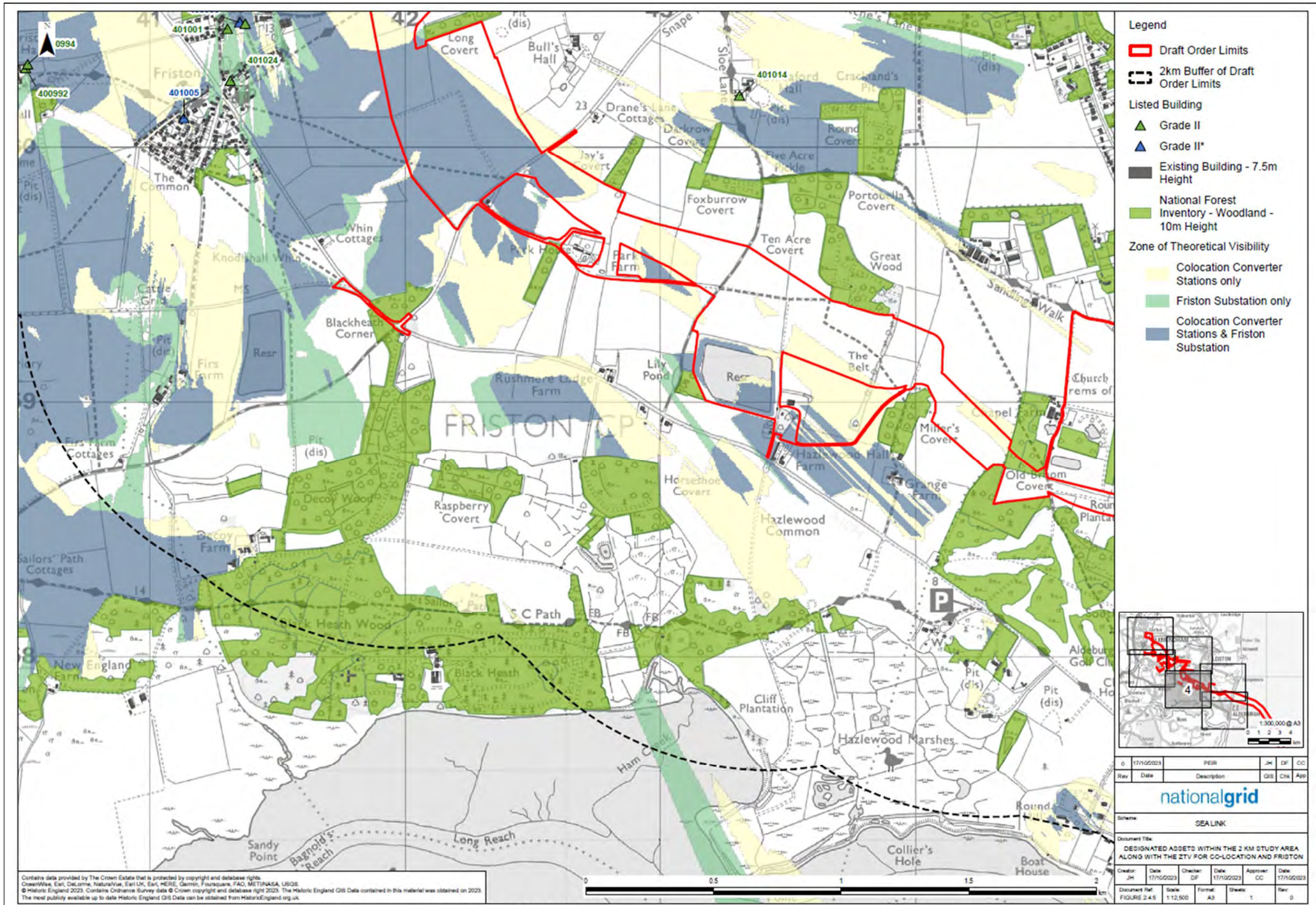

Figure 10. Sea Link 2023-10 PEIR Volume 3 Part 2 Chapter 4 Figures A Heritage & Landscape with ZTV, page 24 [Drawing 4 of 6]
DESIGNATED ASSETS WITHIN THE 2KM STUDY AREA ALONG WITH THE ZTV FOR CO-LOCATION AND FRISTON

Figure 11.Sea Link 2023-10 PEIR Volume 3 Part 2 Chapter 4 Figures A Heritage & Landscape with ZTV, page 24 [Drawing 6 of 6]
DESIGNATED ASSETS WITHIN THE 2KM STUDY AREA ALONG WITH THE ZTV FOR CO-LOCATION AND FRISTON

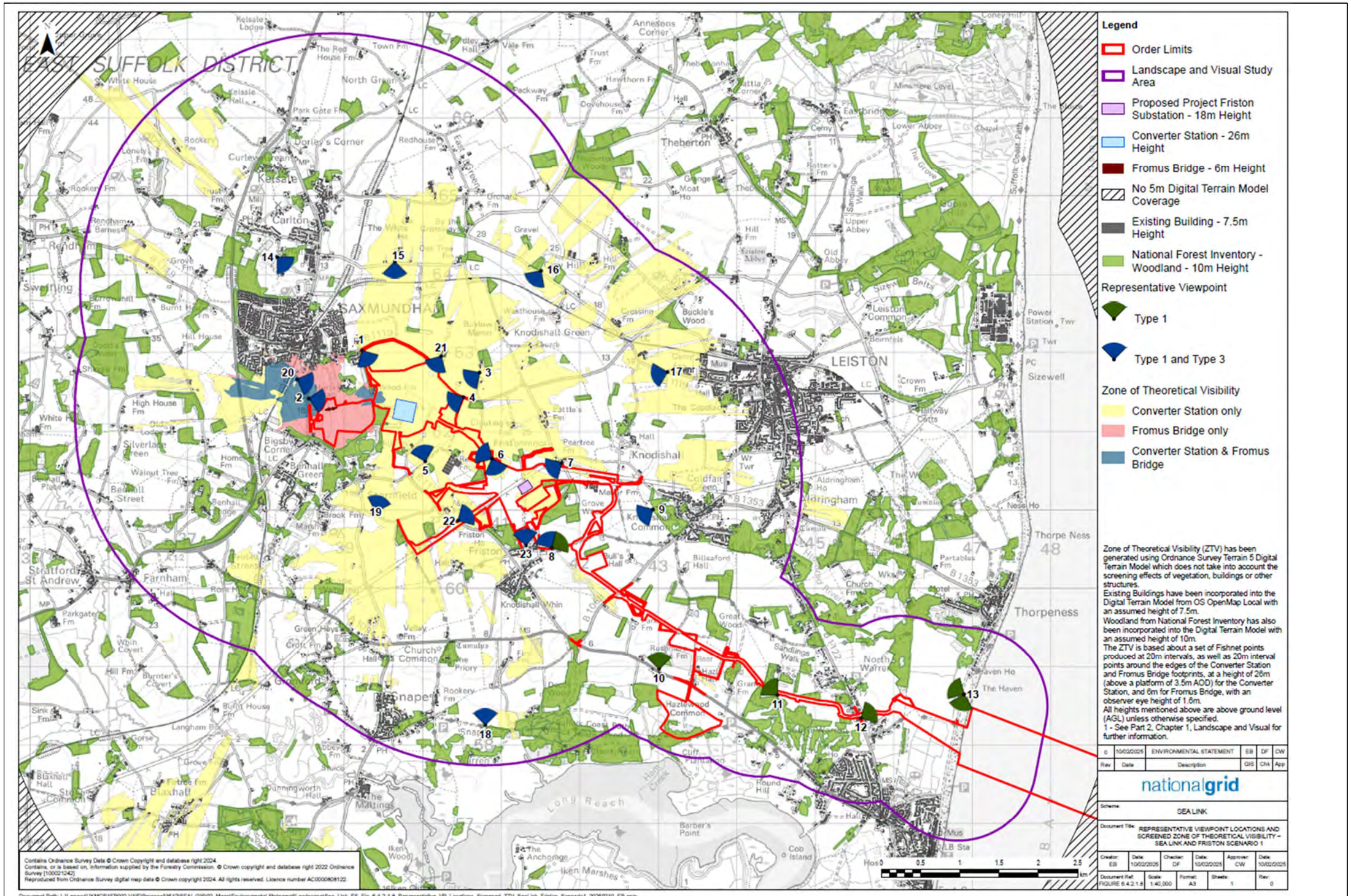

Figure 12. Sea Link EN020026-000339-6.4.2.1 ES Figures Suffolk Landscape and Visual Part 1 of 7, page 14
REPRESENTATIVE VIEWPOINT LOCATIONS AND SCREENED ZONE OF THEORETICAL VISIBILITY – SEA LINK AND FRISTON SCENARIO 1

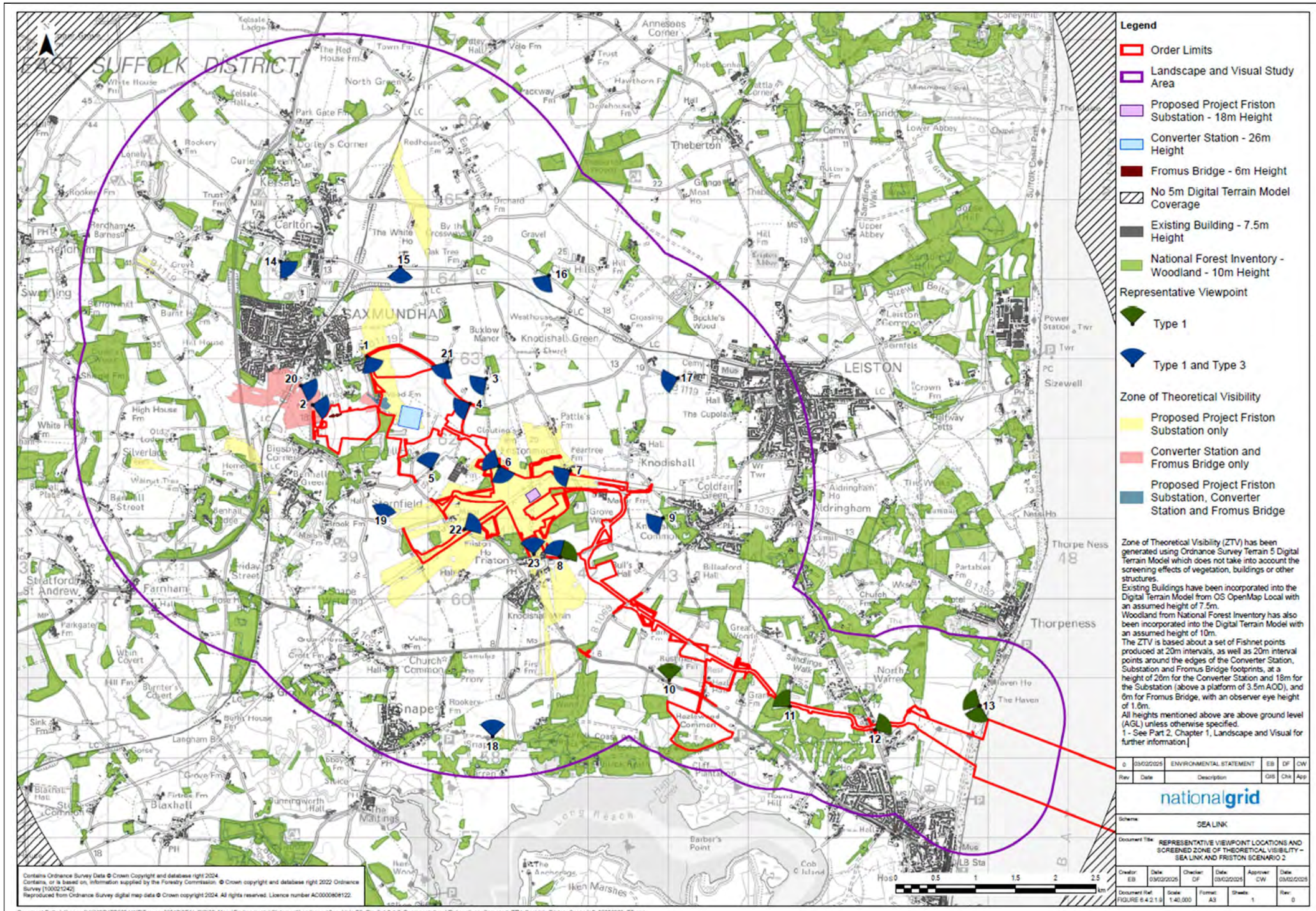

Figure 13. Sea Link EN020026-000339-6.4.2.1 ES Figures Suffolk Landscape and Visual Part 1 of 7, page 15
REPRESENTATIVE VIEWPOINT LOCATIONS AND SCREENED ZONE OF THEORETICAL VISIBILITY – SEA LINK AND FRISTON SCENARIO 2

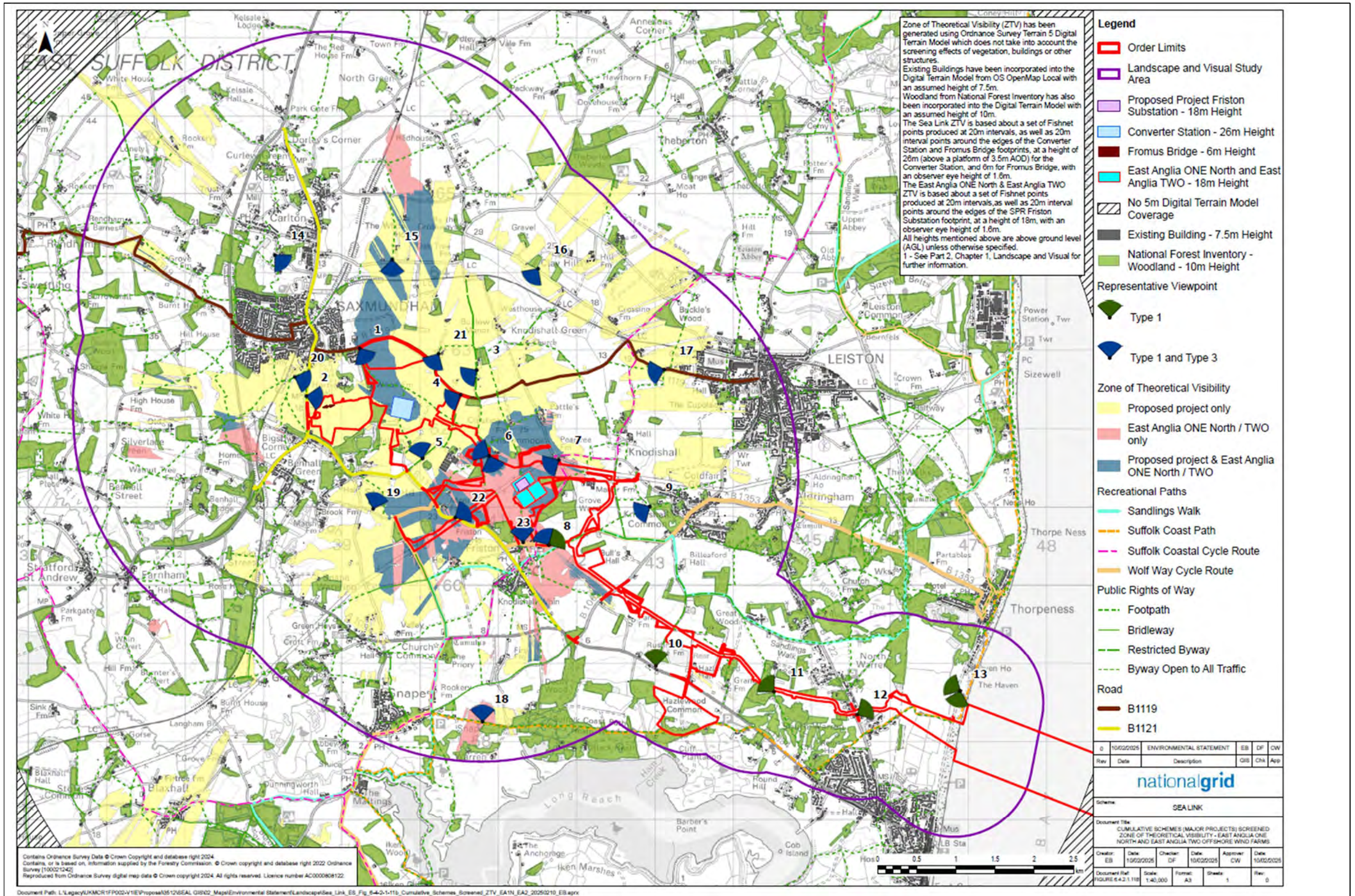

Figure 14. Sea Link EN020026-000343-6.4.2.1 ES Figures Suffolk Landscape and Visual Part 7 of 7, page 7
CUMULATIVE SCHEMES (MAJOR PROJECTS) SCREENED ZONE OF THEORETICAL VISIBILITY - EAST ANGLIA ONE NORTH AND EAST ANGLIA TWO OFFSHORE WIND FARMS

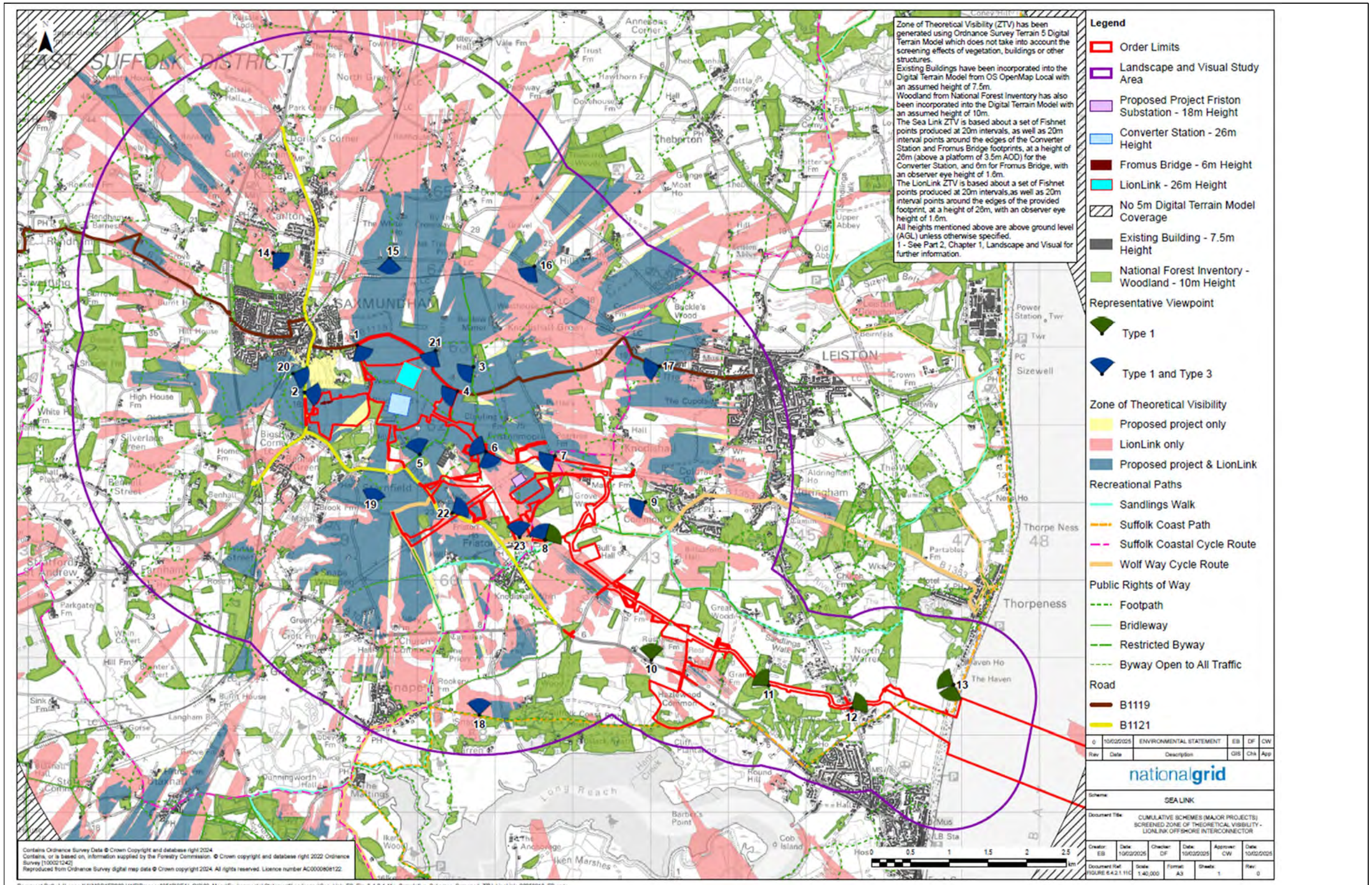

Figure 15. Sea Link EN020026-000343-6.4.2.1 ES Figures Suffolk Landscape and Visual Part 7 of 7, page 8
CUMULATIVE SCHEMES (MAJOR PROJECTS) SCREENED ZONE OF THEORETICAL VISIBILITY – LIONLINK OFFSHORE CONNECTOR

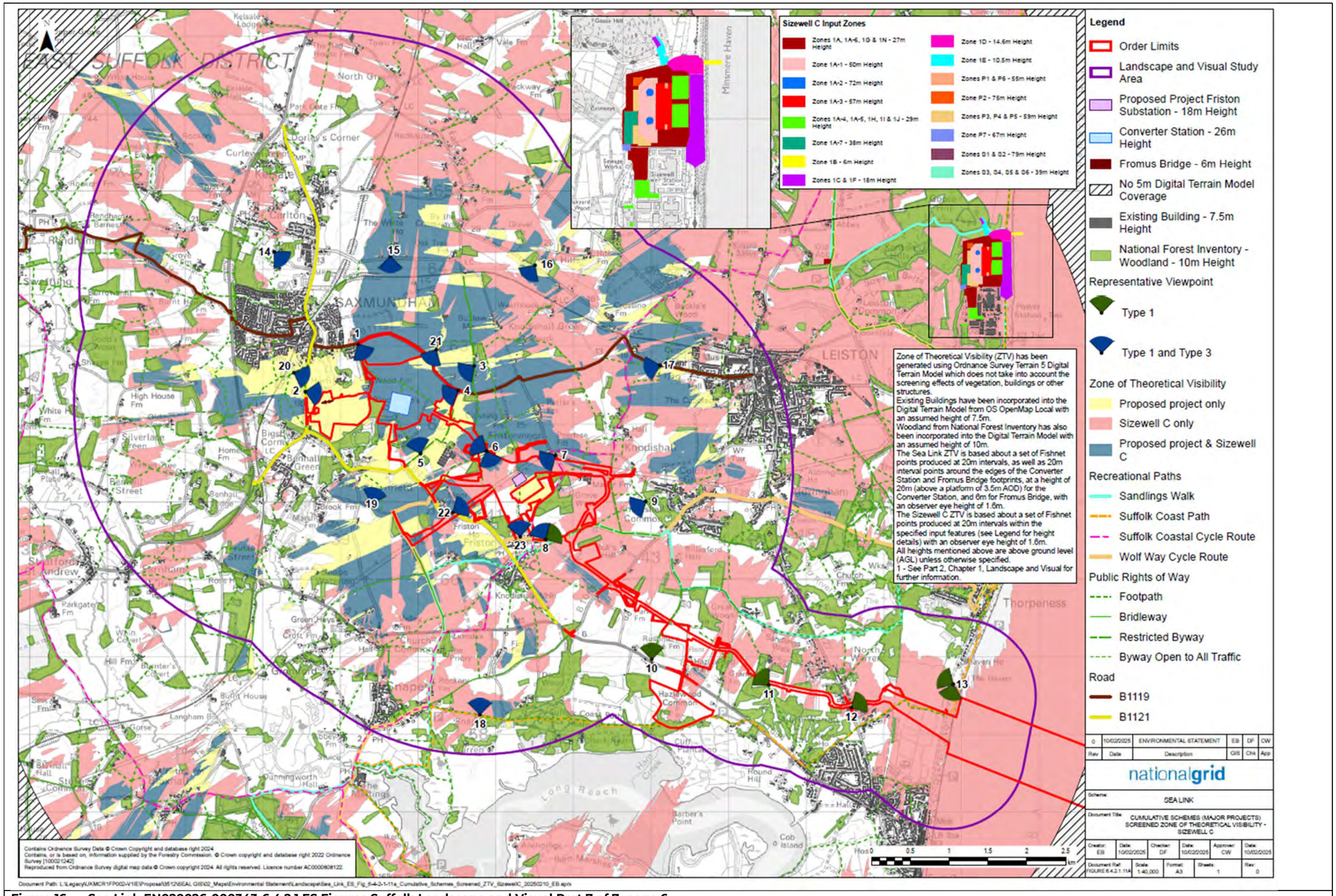

Figure 16. **Sea Link EN020026-000343-6.4.2.1 ES Figures Suffolk Landscape and Visual Part 7 of 7, page 6**
CUMULATIVE SCHEMES (MAJOR PROJECTS) SCREENED ZONE OF THEORETICAL VISIBILITY – SIZEWELL C

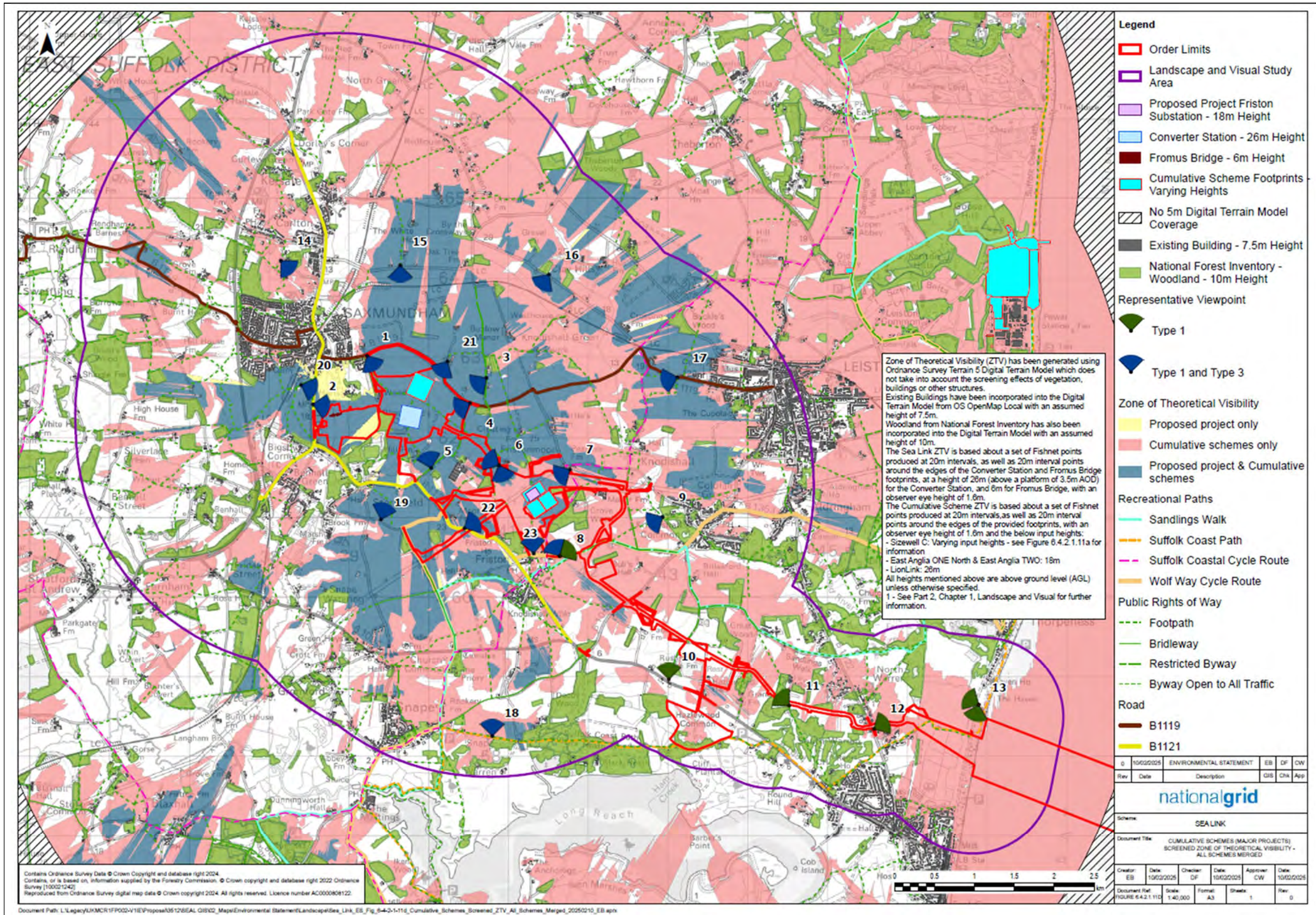

Figure 17. Sea Link EN020026-000343-6.4.2.1 ES Figures Suffolk Landscape and Visual Part 7 of 7, page 9
CUMULATIVE SCHEMES (MAJOR PROJECTS) SCREENED ZONE OF THEORETICAL VISIBILITY – ALL SCHEMES MERGED

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