WILTSHIRE COUNCIL **AGENDA ITEM NO.**

NORTHERN AREA PLANNING COMMITTEE

4 OCTOBER 2017

COMMONS ACT 2006 – SECTIONS 15(1) AND (3)
APPLICATION TO REGISTER LAND AS A TOWN OR VILLAGE GREEN – LAND ADJACENT TO VOWLEY VIEW AND HIGHFOLD, ROYAL WOOTTON BASSETT

Purpose of Report

1. To consider the evidence submitted with an application made under Sections 15(1) and (3) of the Commons Act 2006, to register land adjacent to Vowley View and Highfold, Royal Wootton Bassett, as a Town or Village Green in order to determine the application, (please see **Appendices A** and **B**).

Relevance to Council's Business Plan

2. Working with the local community to provide a countryside access network fit for purpose, making Wiltshire an even better place to live, work and visit.

Background

3. Wiltshire Council is in receipt of an application dated 30 March 2016, made under Section 15(1) of the Commons Act 2006, to register land adjacent to Vowley View and Highfold, Royal Wootton Bassett, as a Town or Village Green (**Appendix B**). Section 15(1) states that:

   "15 Registration of greens
   (1) Any person may apply to the commons registration authority to register land to which this Part applies as a town or village green in a case where subsection (2), (3) or (4) applies."

4. The application is also made under Section 15(3) of the Act where use of the land for recreational purposes has ceased and the application is made within one year of the cessation of use. Wiltshire Council must therefore consider the evidence in order to determine the following:

   (3) This subsection applies where -
   (a) a significant number of inhabitants of any locality, or of any neighbourhood within a locality, indulged as of right in lawful sports and pastimes on the land for a period of at least 20 years;
   (b) they ceased to do so before the time of the application but after commencement of this section; and
   (c) the application is made within the relevant period.

(3A) In subsection (3), "the relevant period" means -
(a) in the case of an application relating to land in England, the period of one year beginning with the cessation mentioned in subsection (3)(b);
(b) in the case of an application relating to land in Wales, the period of two years beginning with that cessation."

Main Considerations for the Council

5. The Council has considered the following evidence in its determination of the application:

(i) Application to register land as a town or village green from Mr R P Gosnell, received and date stamped by the Registration Authority on 12 April 2016, and found to be validly (duly) made on 15 September 2016 (**Appendix B**).

(ii) 27 completed user evidence forms, with maps, submitted with the application, (summary of evidence included at Appendix 1 of the Decision Report which is appended to this report as **Appendix C**).

(iii) Objections from Blake Morgan LLP dated 18 November 2016 (enclosing Opinion of Gregory Jones QC dated 18 November 2016), on behalf of the landowners Cooper Estates Ltd, (Appendix 2 of Decision Report attached at **Appendix C**).

(iv) Representation of support from Royal Wootton Bassett Town Council, dated 14 November 2016, (Appendix 3 of Decision Report attached at **Appendix C**).

(v) Representations of support from Councillor Chris Hurst, Councillor for Royal Wootton Bassett South, dated 5 October 2016 and 13 November 2016, (Appendix 4 of Decision Report attached at **Appendix C**).

(vi) Further comments on the objections from Mr R P Gosnell, dated 9 December 2016, (Appendix 5 of Decision report attached at **Appendix C**).

(vii) Further comments from Blake Morgan LLP dated 2 March 2017 (enclosing Further Opinion of Gregory Jones QC dated 27 February 2017), on behalf of the landowners Cooper Estates Ltd, (Appendix 6 of Decision Report attached at **Appendix C**).

6. In a town/village green application the Council, as the Registration Authority, has no investigative powers and it is for the applicant to discharge the burden of proof in this case. The standard of proof is the balance of probabilities and each component part of the legal test, as set out under Sections 15(1) and (3) of the Commons Act 2006, must be satisfied in order for the application to succeed. The Council as Registration Authority must deal with the application in a fair and reasonable manner. Officers of the Council have carefully considered the evidence submitted in this case and are satisfied that the applicant has successfully discharged the burden of proof, (please see paragraphs 13.1 – 13.95 of the decision report attached at **Appendix C**, where the evidence is

considered in detail). Furthermore, the objectors do not challenge the evidence submitted in support of the application, (please see correspondence attached at Appendices 2 and 6 of the Decision Report attached at **Appendix C**).

Comments on the objections

7. The landowner, Cooper Estates Ltd, has objected on two grounds, (please see Appendices 2 and 6 of the Decision Report attached at **Appendix C**, for objections in full), including the timing and validity of the application:

"1. I refer to the letter received from Wiltshire Council, notifying Cooper Estates that a Village Green claim has been made against land at Vowley View which is owned by Cooper Estates ("the site"). The letter is dated 30 September 2016. The letter was received on 3 October 2016. It relates to an application to register land as a village green. The covering letter and notice of application refers to a claim of use by local residents for sports and pastimes since 1975 and possibly since 1969 and last used in May 2015. The letter does not state when the application was made nor explain the reason for the long delay notifying the owners of the land. However, the application itself is dated 30 March 2016 is date stamped by the registration authority as 12 April 2016.

2. I do note that [the] *application form has amendments dated 11 September 2016 and the plan accompanying the letter has also been modified and dated both 13 and 14 September 2016.*

3. I pause to observe that it is unsatisfactory that Wiltshire Council's letter does not state the date upon which is considers the application validly to have been made. The date of a valid application for a village green is highly relevant for a number of reasons.

4. Since 1 October 2013 s.14 of the Growth and Infrastructure Act 2013 amended s.15(3) of the Commons Act 2006 so that an application for a village green had to be validly made one year after the last date the land was used for recognised sports and pastimes. In this case, no specified date is given as the end date in May 2015 and the letter and notice does not record when the application was validly made and whether that is only when the application was amended in September 2016. Thus, this application may well be out of time for this reason alone."

8. It is helpful at this stage to consider the chronology of events with regard to the application to register the land at Royal Wootton Bassett as a Town or Village Green:

2006 – A fence is placed around the land which has previously been open to Vowley View and Highfold. Access to the land is still possible via an unlocked gate in the northern boundary fence.

May 2015 – The applicant claims that use of the application land ceases where the land is no longer accessible upon the locking of the gate in the perimeter fence.

Summer 2015 – The land is accessed by residents for another BBQ and to mow the land on one or two occasions. Access to the land is gained through gaps in the fence which it is claimed have occurred naturally where the land and the fence have not been maintained by the landowner.

30 March 2016 – Application to register land at Vowley View and Highfold, Royal Wootton Bassett, as a Town or Village Green, is dated by the applicant.

12 April 2016 – Town / Village green application received by Wiltshire Council, as the Registration Authority, in the form of Form 44; Statutory Declaration; map Exhibits A and B and 27 completed user evidence forms, and date stamped by the Registration Authority accordingly, (please see **Appendix B**).

15 April 2016 - The Registration Authority writes to the Planning Authorities requesting them to advise whether or not planning trigger or terminating events are in place over the land which would exclude the right to apply, (Section 16 Growth and Infrastructure Act 2013):

- **27 April 2016** - Wiltshire Council Spatial Planning – *"I confirm that no trigger or terminating event has occurred on the land".*
- **10 May 2016** - The Planning Inspectorate – *"I confirm that no trigger or terminating event has occurred on the land".*
- **15 June 2016** - Wiltshire Council Development Control – *"I can confirm that the following applications have been submitted on the land in question:*
  Application N/02/02965/FUL – Erection of 1 dwelling – Application withdrawn
  Application N/03/00817/FUL – Two storey detached dwelling – Refused planning permission by the Council and dismissed at appeal
  Application 14/12039/FUL – Detached Dwelling – Refused planning permission by the Council on 01/07/2015. The application was appealed and dismissed at appeal.
  If my understanding is correct the submissions were both Trigger Events and Terminating Events."

25 July 2016 – Where the application is found not to be in order, Form 44; Statutory Declaration and map Exhibits A and B are returned to the applicant, where Regulation 5(4) of The Commons (Registration of Town or Village Greens) (Interim Arrangements) (England) Regulations 2007, allows the applicant opportunity of putting the application in order.

15 September 2016 – Application is found to be in order.

30 September 2016 - 6 October – Notice of the application is served upon the landowner, applicant and other interested parties; posted on site and placed in a local newspaper. A copy of the application including the evidence placed on public deposit in Wiltshire Council offices and at the offices of Royal Wootton Bassett Town Council. All parties given six weeks to make representations, i.e. by Friday 18 November 2016.

5 October – 18 November 2016 – Objections and representations:

- **5 October 2016** – Representation of support – Cllr Chris Hurst
- **13 November 2016** – Representation of support – Cllr Chris Hurst
- **14 November 2016** – Representation of support – Royal Wootton Bassett Town Council

- **18 November 2016** – Representation of objection – Blake Morgan LLP acting on behalf of their client Cooper Estates Ltd (the landowners) enclosing Opinion of Gregory Jones QC, also dated 18 November 2016.

22 November 2016 – Objection and representations forwarded to the applicant for comment (as required under Regulations 6(3) and (4)), response required by 22 December 2016).

9 December 2016 – Mr Richard Gosnell (the applicant) makes formal written comments on the objections.

2 March 2017 – Objectors, Blake Morgan LLP submit further representations on the applicants further comments on the objections and include Further Opinion from Gregory Jones QC, dated 27 February 2017.

9. The issues of timing and validity of an application are dealt with in a very detailed manner in case law, in the Court of Appeal before Lady Justice Arden, Lord Justice Richards and Lord Justice Vos - R (Church Commissioners for England) v Hampshire County Council and Anr and Barbara Guthrie [2014] EWCA Civ 643. It concerns a case where Mrs Barbara Guthrie filed an application with the registration authority on 30 June 2008, the application was found to be defective in several respects, finally complying with all the requirements of the regulations on 20 July 2009.

10. Lady Justice Arden states that:

"The primary rule in Section 15 is that the recreational use must be continuing at the date of the application: see Section 15(2). In some cases, however, of which this is said to be one, that use will have ceased before the TVGA [Town Village Green Application]. Sections 15(3) and (4) deal differently with cessation before and after commencement of CA [Commons Act] 2006. Lewison LJ explained in R(Newhaven Port & Properties Ltd) v East Sussex County Council (No.2) EWCA Civ 673, [2013] 3 WLR 1433 at [62] to [63] that this is because it was easier for a landowner to cause the use to cease before that date than afterwards since before that date he simply had to give notice that he consented to the use and not physically prevent use of the land. Accordingly Section 15 provides that an application for registration as a TVG may be made within 5 years of the cessation if cessation occurred before the date of commencement of Section 15 (Section 14(4)). It provides a 2 year period (in the case of England) and a 1 year period (in the case of Wales) where the cessation takes place after the commencement of Section 15 (Section 15(3) and (3A)."

11. Section 14(3) of the Growth and Infrastructure Act 2013, inserted Section 15(3A) into the Commons Act 2006, which reduced the relevant period in England from two years to one year.

12. In the objection, Gregory Jones QC correctly states that the application for a village green must be made within one year of the date of the cessation of use, so the date at which the Registration Authority accepts the application is highly relevant, is it when the application is date stamped upon receipt by the Registration Authority, (in this case 12 April 2016), or the date on which a defective application is put in order to meet all the requirements contained within the regulations to the Act, (15 September 2016)?

13. The Hampshire case goes on to discuss this. Lady Justice Arden sets out the requirements of an application and states:

"Form 44 refers to guidance notes, which are published separately. They are thus non-statutory and do not form part of the Regulations. They state in relation to a TVGA that the stamp which the registration authority gives to the application as the date of receipt "may be important, because it is the date against which the time limits on applications in Section 15(3) and 15(4) apply"."

14. Mrs Guthrie's application was filed on 30 June 2008 and was defective in three parts; parallels may be drawn between the Hampshire case and the Royal Wootton Bassett case.

15. There is no requirement within the regulations for the registration authority to serve notice of the application upon the landowner, until it is put in order as Lady Justice Arden states:

"34. The limited possibility for correction to which I referred in paragraph 1 of this judgement is to be found in Regulation 5(4) of the Regulations. This suspends the registration authority's right to reject a non-compliant application and thus its obligation to give notice of application to persons interested in the land and to the public, until the applicant has been given a reasonable opportunity to put her application in order:

"(4) Where an application appears to the registration authority after preliminary consideration not to be duly made, the authority may reject it without complying with paragraph (1), but where it appears to the authority that any action by the applicant might put the application in order, the authority must not reject the application under this paragraph, without first giving the applicant a reasonable opportunity of taking that action."

16. Therefore, the registration authority was correct in not notifying the landowner that the application was made until after the date on which it was put in order and when it did so, it attached notice as per the wording of Form 45, which is set out within the regulations and advised that the application had been made publicly available for inspection as required. The authority has acted correctly in this case.

17. Lady Justice Arden continues:

"35. Mr Karas contends that Regulation 5(4) is not retrospective so that any corrected application only takes effect from the date of filing of the corrected application. But this argument runs up against this point, pressed by Mr Hobson, that under Regulation 4 (set out in the Annex to this judgement) the Registration authority must stamp every application on receipt. Regulation 5(4) does not suspend this obligation nor is there any provision for altering that date. In response to this difficulty, Mr Karas argues that the expression "made" in Regulation 5(1), which starts with the words "where an application is made under Section 15(1)" of the CA 2006, means "duly made in accordance with the regulations": see Sections 15 and 24(1). But if that were so, Regulation 5(4) would not have to suspend that obligation…"

"…If within the reasonable opportunity so given the applicant corrects the errors, the original application has full force and effect and therefore the Regulation must be retrospective.

I reach this conclusion on the basis that the Regulations throughout refer to one and the same application. In addition, the application is given a date on the receipt. Dating the application must be for some purpose…"

"…The point remains that it would be wholly misleading for the application to be dated with the date of its receipt it that were not its effective date.

42. The guidance note referred to in form 44 is consistent with the view that I have taken (see paragraph 10, above). Although it is non-statutory, it has some weight because it is referred to in form 44 which is a statutory document.

43. I agree with the judge that it would have been better if Parliament had provided that the landowner should receive a precautionary notice as soon as an application was received. However, that point seems to me to lead to the conclusion that the period between the date of the application and its due completion should be short.

44. Accordingly, I conclude on this issue that Regulation 5(4) provides a means for curing deficiencies in an application which does not provide all the statutory particulars, and, once an application is so cured, it is treated as duly made on the date on which the original defective application was lodged."

18. Where the Hampshire judgement is applied in the Royal Wootton Bassett case, the date of the application should be taken as 12 April 2016 when the registration authority date stamped the application upon receipt and therefore the application is correctly made within one year of the cessation of use at the end of May 2015, or late 2015.

19. The landowners also object on the ground that there is a planning "trigger event" in place over the land, which would effectively extinguish the right to apply to register land as a town or village green, where *"the site in question is subject to the adopted Core Strategy"* and *"The current site is within limits for development of Royal Wootton Bassett. Wiltshire Council having considered these policies has previously accepted that the "location of the site is therefore considered appropriate for development in principle…"*

"It is clear from the wording of the policy that the site in question was identified as land for "potential development" before the application to register the site as a village green was made. The trigger event had thus been triggered before the application was made. Accordingly, the application is invalid and must be rejected."

20. The question of planning trigger and terminating events over the land arises from the Growth and Infrastructure Act 2013, which introduced a series of provisions to make it more difficult to register land as a town or village green, this included at Section 16 the removal of the "right to apply" where specified planning events have occurred, (please see part 10 of the decision report attached at **Appendix C** to this report).

21. Accordingly, upon receipt of the application, Wiltshire Council, in its capacity as the Registration Authority, wrote to the planning authorities on 15 April 2016, including a list of trigger and terminating events, requesting details of any trigger/terminating events in place over the land at this time. Correspondence was addressed to Spatial Planning – Wiltshire Council; Development Control – Wiltshire Council and the Planning Inspectorate, all of whom identified that there were no "trigger events" in place over the land at that time, (without corresponding terminating events), which would extinguish the right to apply.

22. Wiltshire Council, as the Registration Authority, must rely upon the responses given by the planning authorities. In this case the objectors' representations, regarding trigger events in place over the land, were forwarded to Spatial Planning at Wiltshire Council for further comment. The Head of Spatial Planning has given the following advice:

"I have considered the objector's assertions that there is a trigger event in place. However, I can confirm that in our opinion no trigger event has occurred in relation to the land in question, as the land/site (subject of the application) is not specifically identified for potential development, although strategic policy for the area exists as set out in the Wiltshire Core Strategy (adopted January 2015)."

23. Therefore, the right to apply has not been extinguished and the Registration Authority must continue to determine the town/village green application, based upon the available evidence, which is not disputed by the objectors.

24. In correspondence, Royal Wootton Bassett Town Council has submitted the minutes of its Planning Committee meeting held on Thursday 29 January 2015. The Parish Council considers Planning Application No.14/12039/FUL, erection of new dwelling with integral garage on land opposite numbers 8-10 Vowley View, Royal Wootton Bassett and concludes that the development of this site would contravene Core Policies 51 and 52 of the Wiltshire Core Strategy, (please see correspondence attached at Appendix 3 of the Decision Report attached at **Appendix C**).

Overview and Scrutiny Engagement

25. Overview and Scrutiny Engagement is not required in this case. The Council must follow the statutory procedure which is set out under "The Commons (Registration of Town or Village Greens) (Interim Arrangements) (England) Regulations 2007 (2007 SI no.457)".

Safeguarding Considerations

26. Considerations relating to safeguarding anyone affected by the registration of the land as a Town or Village Green under Sections 15(1) and (3) of the Commons Act 2006, are not considerations permitted within the Act. The determination of the application must be based upon the relevant evidence alone.

Public Health Implications

27. Considerations relating to the public health implications of the registration of the land as a Town or Village Green under Sections 15(1) and (3) of the Commons Act 2006, are not considerations permitted within the Act. The determination of the application must be based upon the relevant evidence alone.

Corporate Procurement Implications

28. Where land is registered as a Town or Village Green, there are a number of opportunities for expenditure to occur and these are considered at paragraphs 32-34 of this report.

Environmental and Climate Change Impact of the Proposal

29. Considerations relating to the environmental or climate change impact of the registration of the land as a Town or Village Green under Sections 15(1) and (3) of the Commons Act 2006, are not considerations permitted within the Act. The determination of the application must be based upon the relevant evidence alone.

Equalities Impact of the Proposal

30. Considerations relating to the equalities impact of the registration of the land as a Town or Village Green under Sections 15(1) and (3) of the Commons Act 2006, are not considerations permitted within the Act. The determination of the application must be based upon the relevant evidence alone.

Risk Assessment

31. Wiltshire Council has a duty to process applications made under Section 15(1) of the Commons Act 2006, to register land as a Town or Village Green, in a fair and reasonable manner. If the Council fails to pursue its duty it is liable to complaints being submitted through the Council's complaints procedure, potentially leading to complaints to the Local Government Ombudsman. Ultimately, the decision could be challenged through judicial review proceedings in the High Court with a risk of the Council being ordered to pay significant costs if the Council were found to have acted unlawfully.

Financial Implications

32. Presently there is no mechanism by which a Registration Authority may charge the applicant for processing an application to register land as a Town or Village Green and all costs are borne by the Council.

33. It is possible for the registration authority to hold a non-statutory public inquiry into the evidence, appointing an independent Inspector to produce a report and recommendation to the determining authority. There is no clear guidance available to authorities regarding when it is appropriate to hold an inquiry; however, it is the authority's duty to determine an application in a fair and reasonable manner and its decision is open to legal challenge, therefore a public inquiry should be held in cases where there is serious dispute, or the matter is of

great local interest. Even where a non-statutory public inquiry is held, there is no obligation on the authority to follow the recommendation made.

34. The cost of a three day non-statutory public inquiry is estimated to be in the region of £8,000, (based on figures obtained in March 2017 from 3 Paper Buildings Barristers Chambers, of £1,000 per day to include three day inquiry, two days preparation and three days report writing). In the Royal Wootton Bassett case it is not considered that a non-statutory public inquiry is necessary, where there is sufficient evidence provided to enable the Registration Authority to determine the application; the objectors do not dispute the evidence and the main point of objection relating to trigger events in place over the land, is unlikely to be resolved by hearing the witnesses give evidence in chief and through the process of cross-examination of the witnesses at a public inquiry.

Legal Implications

35. If the land is successfully registered as a Town or Village Green, the landowner is able to challenge the Registration Authority's decision by appeal to the High Court under Section 14(1)(b) of the Commons Registration Act 1965, which applies where Section(1) of the Commons Act 2006 is not yet in place, i.e. outside the pilot areas (Wiltshire is not a pilot area). Importantly, an appeal under Section 14(1)(b) of the 1965 Act is not just an appeal, but enables the High Court to hold a complete re-hearing of the application and the facts of law. There is no time limit in bringing these proceedings following the registration of the land, it may be years after the decision and could lead to de-registration of the land.

36. Alternatively, where the Registration Authority determines not to register the land as a Town or Village Green, there is no right of appeal for the applicant; however, the decision of the Council may be challenged through judicial review, for which permission of the court is required and application must be made within three months of the decision. Likewise, judicial review proceedings are also open to a landowner where the land is registered as a Town or Village Green.

Options Considered

37. The options available to the Registration Authority and Members of the Committee are as follows:

(i) Based on the available evidence to grant the application to register the land as a Town or Village Green where it is considered that the legal tests for the registration of the land, as set out under Sections 15(1) and (3) of the Commons Act 2006, have been met in full over the whole of the application land, or

(ii) Based on the available evidence, to grant the application in part, where it is considered that the legal tests for the registration of the land, as set out under Sections 15(1) and (3) of the Commons Act 2006, have been met in full over only part of the application land, or

(iii) Based on the available evidence to refuse the application where it is considered that the legal tests for the registration of the land, as set out under Sections 15(1) and (3) of the Commons Act 2006, have not been met in full, or

(iv) Where, after consideration of the available evidence, it has not been possible for the Council to determine the application, to hold a non-statutory public inquiry, appointing an independent Inspector to preside over the inquiry and examine the evidence, including the oral evidence and cross-examination of witnesses and to provide a report and recommendation to the determining authority.

38. The Committee must consider only the evidence in making a decision on the application. Where the Committee determines the application against the Officer's recommendation it must give legally valid, evidential reasons for this decision.

Reason for Proposal

39. In the Royal Wootton Bassett application, it is considered that a non-statutory public inquiry is not required because the evidence on the facts provided is not disputed by the objectors and it is considered there is now sufficient evidence provided by all relevant parties to enable the Registration Authority to determine the application.

40. The available evidence, examined by the Registration Authority, supports use of the whole of the application land by inhabitants of the neighbourhood of Vowley View and Highfold, within the locality of Royal Wootton Bassett, for the purposes of lawful sports and pastimes for a period of at least 20 years, as of right, with use of the land ending in May 2015 or late 2015, the relevant user period being 1995 – 2015, on the balance of probabilities. The applicant has successfully discharged the burden of proof and the objectors do not challenge this evidence.

41. With regard to the objectors comments on the timescales and validity of the application and notice given to the landowners, the application of the Hampshire case law, shows that the effective date of the application is the date of its receipt by the registration Authority (12 April 2016), therefore, the application is correctly made within one year of the cessation of use in May 2015 or late 2015. It was correct to allow the applicant opportunity to put the application in order and there was no requirement for the authority to notify the landowners until after this process was completed on 15 September 2016. The Registration Authority has acted correctly.

42. Where the objectors state that there is a trigger event in place over the land, i.e. where there is a presumption in favour of development by the inclusion of Royal Wootton Bassett as a Market Town within the Wiltshire Core Strategy (adopted January 2015), the Registration Authority must rely upon the information provided by the Planning Authorities, who have informed the Registration Authority that there are no trigger or terminating events in place upon the land. Therefore, the right to apply to register the land as a Town or Village Green is not extinguished and the Registration Authority must continue to determine the application based on the available evidence, which is not disputed by the objectors.

Proposal

43. That the application to register land at Vowley View and Highfold, Royal Wootton Bassett, as a Town or Village Green, be accepted and the application land be registered in full under Sections 15(1) and (3) of the Commons Act 2006.

Tracy Carter
Associate Director – Waste and Environment

Report Author:
Janice Green
Rights of Way Officer

The following unpublished documents have been relied on in the preparation of this report:

27 completed user evidence forms and photographs submitted in support of the application

(Please note that these documents are available to be viewed at the offices of Wiltshire Council: Rights of Way and Countryside, Waste and Environment, Wiltshire Council, Unit 9, Ascot Court, White Horse Business Park, Trowbridge, Wiltshire, BA14 0XA)

Appendices:

Appendix A – Location Plan
Appendix B – Application to register land adjacent to Vowley View and Highfold, Royal Wootton Bassett, as a Town or Village Green, (Application dated 30 March 2016 and date stamped by Wiltshire Council as the Registration Authority 12 April 2016)
Appendix C – Decision Report (28 June 2017)