

## Appendix 2: Consultation Summary Sheets



# Housing growth and infrastructure Lambeth

London's population is expected to reach 10.3 million people by 2035 which means every borough in London, including Lambeth, must plan for more housing. We need to strike the right balance in using land for housing with that needed for jobs, businesses and supporting infrastructure. We also want to make sure the benefits of new development reach those who need it the most.

The Mayor's London Plan sets the housing target for the number of new homes that must be built in each borough – we now know for Lambeth the new target is 1,589 additional homes each year over ten years. Lambeth has a very good track record in meeting and exceeding its housing target and we expect to be able to meet this new target.

## What you told us

- Higher density developments that include new housing are suitable in town centres and areas with good public transport.
- To help increase the overall amount of new housing in Lambeth, we should release a limited amount of industrial land to allow for mixed use development that includes both housing and business space.
- Family homes should continue to be protected from conversion into flats.
- Developers should be required to provide greater amounts of green infrastructure in new developments which should be high quality, usable green spaces for a range of activities.
- Private gardens and balconies in new blocks of flats are important for health and wellbeing and quality of life.
- Building very small flats or rooms with shared living space much smaller than the minimum standards is not the best way to increase the number of new, more affordable homes for younger people.
- Vauxhall does not need more specialist student housing, the priority should be general needs housing and space for businesses.

## What our evidence tells us

- There is a need to protect industrial land in Lambeth as well as finding land for new housing.
- There is enough land in Lambeth to meet the Mayor's new housing target without releasing significant amounts of industrial land.
- There is a need for family sized housing but household sizes overall are expected to fall.
- Lambeth has a good record of granting planning permission for new housing on smaller sites.
- There is scope for some additional units to be created through residential conversions, while maintaining strong control over harmful impacts and protecting the mix and balance of communities.
- Experience of large-scale purpose-built shared living elsewhere in London suggests room sizes are small and rents are high, compared to the rest of the private rented sector.
- There is a strong pipeline of purpose built student accommodation in Lambeth, particularly in Vauxhall.



# Housing growth and infrastructure



Lambeth

## What we are proposing to do

- Develop a new Infrastructure Delivery Plan for Lambeth to ensure housing and economic growth is supported by the necessary infrastructure.
- Maintain overall protection for industrial land but with some limited release for housing.
- Instead of the current 'streets under conversion stress' approach manage residential conversions by protecting all houses of less than 150 square meters from being converted into flats, requiring conversions to provide at least one family-sized home and restricting parking permits where possible.
- Require major developments to include urban greening measures like street trees, green roofs, green walls and rain gardens.
- Maintain clear private amenity space standards in new residential developments.
- Support large-scale purpose-built shared living schemes in the north of the borough only, subject to minimum space standards.
- Support purpose-built student housing where this is linked to particular higher education institutions and does not result in an over-concentration in one area.



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# Affordable housing



Lambeth

There is already a shortage of genuinely affordable housing across London and demand for affordable housing in Lambeth will remain very high over the next 15 years. Policies in the Lambeth Local Plan need to work alongside the Mayor's new London Plan to secure more affordable housing in new residential developments.



## What you told us

- We should follow the Mayor's 'threshold' approach to affordable housing and viability: this means where a development can provide at least 35 per cent affordable housing on site, or 50 per cent on public sector land, and all other policy requirements are met, the financial viability of the scheme will not be tested.
- There should be a higher threshold for affordable housing on industrial land released for housing.
- Developments of fewer than 10 homes should contribute to the delivery of affordable housing.
- It is generally preferable to secure more affordable housing for those on the lowest incomes, even if this means we get less affordable housing overall – rather than more affordable housing overall but with a smaller amount for those on lower incomes.
- London Living Rent and Community Land Trusts are the most popular types of intermediate affordable housing; Starter Homes and Discount Market Sale are the least popular.
- Building more affordable housing is key to supporting workers who provide essential services to the capital find housing they can afford.
- In some case developers of 'Build-to-rent' schemes should provide low cost rented units for those on the lowest incomes.
- We should secure affordable housing for the wider population through purpose built student accommodation developments.

## What our evidence tells us

- There is a very high level of affordable housing need in Lambeth, with a particular need for rented accommodation for those on the lowest incomes.
- We have been successful in securing affordable housing from new developments in recent years but extended discussions about viability often take place.
- The Mayor's proposed affordable housing thresholds are viable in Lambeth alongside other London Plan and Local Plan policy requirements and a proposed higher level of Community Infrastructure Levy (CIL).
- Sites providing fewer than 10 units make a significant contribution to overall supply of housing in the borough and contributions towards affordable housing can be viable on this type of site in Lambeth. However, the new National Planning Policy Framework no longer allows Local Plans to seek affordable housing contributions from smaller sites.
- The priority need for intermediate affordable housing in Lambeth is for households with an income up to £60,000 a year. Very few households needing affordable housing in Lambeth have an income up to £90,000 a year.
- Seeking financial contributions for general needs affordable housing from purpose-built student accommodation, in addition to on-site affordable student accommodation required by the London Plan, would affect the viability of this type of development.

# Affordable housing



Lambeth

## What we are proposing to do

- Follow the London Plan threshold approach to affordable housing: we think this will result in an overall increase in genuinely affordable housing secured through the planning system in Lambeth.
- Continue to require transparent and robust viability testing of all proposed developments that don't meet the policy requirements.
- Continue to require 70% of new affordable housing as low cost rented homes and 30% as intermediate products.
- Prioritise more affordable types of intermediate affordable housing like London Living Rent.
- Remove the current policy requirement for affordable housing contributions from small sites to comply with the new requirements of national planning policy.
- Require purpose built student accommodation schemes to include affordable student accommodation but not general needs affordable housing.
- Require Build-to-Rent proposals to include some low cost rented housing whenever possible.
- Set out clearly the expectations for maximising provision of affordable housing in estate regeneration schemes.



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# Self-build and custom-build housing Lambeth

Self and custom-build housing is built or commissioned by its future residents for their own use. We are required to maintain a local register of people who wish to acquire land to build their own homes. The Local Plan needs to address the new priority given to self and custom-build housing by the government whilst ensuring all types of local housing need are met.

## What you told us

- Self-build and custom-build plots should be made available only to those with a connection to Lambeth to benefit local residents and the existing community.
- Small and awkwardly shaped plots would be the most suitable type of sites for the delivery of self-build or custom-build housing.
- This type of housing should be supported where it makes efficient use of land.

## What our evidence tells us

- By May 2018 724 individuals and five housing associations had signed up to the Lambeth self-build register.
- Of these individuals, 158 currently live in Lambeth. When asked what if any connection applicants have to the borough, the most common response given is 'friends'.
- There are currently no restrictions on who can join the Lambeth self-build register and there is no London-wide coordination of registers. It is likely that some of those registered in Lambeth have also expressed an interest in self-build in other London boroughs.



# Self-build and custom-build housing Lambeth

## What we are proposing to do

- Support self-build and custom-build housing in Lambeth.
- Ensure that self-build and custom-build housing demonstrates that the residential density of the site has been optimised and other planning policy requirements are met.
- Consider introducing eligibility criteria for the Lambeth self-build register.

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# Housing for older people



Lambeth

Housing for older people comes in many different forms: nursing and residential care homes; 'extra care' housing; sheltered housing; co-housing; private retirement housing; housing that has been adapted; and an extension or annex to a family member's house. The Local Plan must plan for the right types of housing to meet the particular needs of older people in Lambeth whilst striking a balance with all the other types of housing need in the borough.

## What you told us

- We should support specialist retirement housing to encourage older people to downsize to release larger family sized homes.
- There were mixed views on whether specialist housing providers for older people should be exempt from contributions to affordable housing.
- Semi-communal living is a way of preventing loneliness and isolation among older people which can reduce the burden on the health service and improve the quality of life for residents.

## What our evidence tells us

- The population of older people in Lambeth is projected to increase over the next 20 years.
- We have a significantly higher proportion of older people in social rented accommodation when compared with national and London-wide averages.
- In June 2017 there were 809 places in residential care and 2,613 units of self-contained accommodation for older people in Lambeth.
- There is currently little specialist accommodation for older people available for sale or private rent in the borough.
- The new London Plan sets a benchmark of 70 units of specialist older persons accommodation (across all tenures) to be provided in Lambeth each year until 2029.





# Housing for older people

## What we are proposing to do

- Support the delivery of housing to meet specific needs, including those of older people.
- Cross-reference new London Plan policy that sets out specific requirements for specialist older persons' housing.
- Require developers of specialist older persons' housing to address the needs of people with dementia and other long-term health conditions in the design of their proposals.
- Encourage co-housing schemes for older people.
- Monitor delivery of older people's housing in Lambeth against the London Plan benchmark.

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# Business and jobs

Lambeth has a vibrant and diverse economy but we want to attract more businesses and jobs into the borough – from creative and digital companies, professional and financial services, health care and life sciences to tourism and hospitality. The Lambeth Local Plan needs to ensure there is enough of the right type of space to meet business needs, manage change and strike the right balance between jobs and housing. We need to take account of recent trends in the London and Lambeth economy which mean there's more flexibility in the way people work and there's growing demand for affordable business space.



## What you told us

- We should secure affordable workspace from developers at less than market rates to encourage new businesses to grow and develop, particularly in the creative and digital industries.
- Affordable workspace should be provided in town centres, council-led regeneration schemes, publicly-owned sites and on sites close to public transport.
- Developers providing affordable workspace should be required to work with specialist affordable workspace providers chosen by us.
- If a choice has to be made in new developments, securing affordable housing should be a greater priority than affordable workspace for small business.
- Developers should sometimes be allowed to provide financial contributions for small business space elsewhere in the borough rather than on-site provision.
- Changes we proposed to areas protected just for jobs and businesses (Key Industrial and Business Areas or KIBAs) were broadly supported.



## What our evidence tells us

- Lambeth has experienced a gradual loss of employment and office floorspace over recent years, partly due to recent changes allowing automatic change of use to housing in some circumstances.
- Creative and technology businesses generate 22,000 jobs in Lambeth. Design and fashion, craft, creative tech, publishing, film, TV and advertising are particularly strong sectors in the borough.
- Creative and digital industries need a range of workspace types and are more successful when located in clusters.
- Growth in our creative and digital sectors has not been as fast as in many other London boroughs due to a lack of suitable and affordable workspace and limited clusters.
- KIBAs in Lambeth are performing well and are well-occupied. Some of our KIBAs have potential for renewal and intensification but there are very few long-term vacant sites.



# Business and jobs

## What we are proposing to do

- Set out a strong policy presumption against the loss of office space to protect the existing stock, and support new offices in appropriate locations.
- Very large office proposals should consider including flexible workspace suitable for micro, small and medium-sized businesses.
- Require major commercial developments in Waterloo, Vauxhall, Oval, Kennington, Clapham, and the Brixton Creative Enterprise Zone to include a proportion of affordable workspace at below market rates to help meet the needs of particular sectors including creative and digital firms.
- Designate new Creative Enterprise Zones in Brixton and West Norwood to support creative and digital industries.
- Continue to protect KIBAs in line with the London Plan approach, encouraging their intensification where possible. Only a limited release of KIBA land for housing is proposed.



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# Town centres



Lambeth

Local Plan policies can help manage change in town centres, guide regeneration projects on particular sites and support economic vitality and diversity. They also need to allow for changes in the way people use town centres and the different needs of businesses.



## What you told us

- The number of betting shops and payday loan shops that can be grouped together in one place should be limited due to their negative impact on the surrounding area and the people who use them.
- Applicants should be required to demonstrate a pub is no longer needed before it can be changed to other uses.
- Nightclubs make a positive contribution to culture and the night-time economy in Lambeth but noise, litter and anti-social behaviour should be managed, especially near residential areas.
- The proposed changes to the boundary of West Norwood district centre are supported, alongside measure to diversify uses in this location.
- Late-night drinking activity in Brixton town centre is causing noise and disturbance for nearby residents.
- Streatham town centre needs investment and diversification.



## What our evidence tells us

- There are 54 betting shops and 5 payday loan shops in Lambeth.
- Clustering of betting shops and payday loan shops can harm the viability and vitality of town centres by discouraging investors and affecting the quality of life of those living nearby.
- Problem gambling can harm public health and well-being.
- Norwood High Street south of the railway line is not performing as well as the rest of the centre, with a third of floorspace vacant.
- There has been a recent significant increase in night-time bars and restaurants along Coldharbour Lane and Railton Road in Brixton, with harmful impacts on neighbouring residential amenity.
- 50% of units in Streatham's primary shopping areas are in retail (A1) use which is below the current policy target of 60%, but the current town centre boundaries correspond well to town centre activity on the ground.
- The Waterloo/Southbank area is equivalent to a 'Metropolitan Town Centre' in the London Plan.



# Town centres

## What we are proposing to do

- Introduce new policy to prevent concentrations and clustering of betting shops and payday loan shops in town centres.
- Strengthen policy protecting pubs from change to other uses.
- De-designate Norwood High Street south of the railway line from the district town centre and re-designate it as a Creative Enterprise Zone to support mixed-use development that provides workspace for creative and digital industries.
- Designate an 'evening economy management zone' in Brixton to manage the number of bars in this area and align planning and licensing policy approaches.
- Maintain the current boundary of Streatham town centre but reduce the minimum policy requirement for A1 shop units in the primary shopping areas from 60% to 50%. Promote investment and diversification in the town centre.
- Lobby the Mayor to designate Waterloo and Southbank as a new Metropolitan town centre in the London Plan.



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# Hotels and visitor accommodation Lambeth

Lambeth is home to many top visitor attractions including the London Eye, the Southbank Centre and National Theatre as well as newer tourist destinations like Brixton. The Local Plan needs to support hotels and other forms of visitor accommodation in appropriate locations while striking the right balance with other much-needed uses such as housing and offices.



## What you told us

- If evidence shows Lambeth has enough visitor accommodation to meet predicted future demand, planning policy should prioritise other uses such as housing and workspace.
- An increase in hotels is reducing services for local communities in Waterloo.
- Planning applications for hotels should assess impact on residential amenity, including noise, traffic, pollution, parking and deliveries.
- Serviced apartments are an alternative to traditional hotels but are a problem if used as permanent accommodation.
- Large new hotels should provide high quality employment, training and career opportunities for Lambeth residents.
- Short-term lets like Airbnb are a good way to meet demand for visitor accommodation in Lambeth alongside hotels.

## What our evidence tells us

- Lambeth has 5,479 serviced visitor rooms and there are six new hotels currently under construction.
- Since April 2015, 1,009 serviced rooms have been completed in Lambeth.
- The majority of Lambeth's hotels are in the north of the borough, particularly in Waterloo with fewer in other town centres in the centre and south of the borough.
- There are currently 594 serviced rooms under construction in Vauxhall.
- In 2018 Lambeth had the 9th highest number of Airbnb listings among London boroughs, with 4,300 active listings.
- There is an estimated 689 student rooms available to visitors in Lambeth during the summer vacation period.







# Hotels and visitor accommodation Lambeth

## What we are proposing to do

- Not allow further hotel developments in Waterloo and set a cap on new hotel bedspaces in Vauxhall.
- Encourage new hotels to locate in appropriate town centre locations elsewhere in Lambeth, so long as they make a positive contribution to the centre and do not restrict the supply of land needed for new housing.
- Require hotel developers to assess the impact of their proposal on local services and neighbours, and to mitigate any harm that might result.
- Prevent the loss of permanent residential accommodation to short-term holiday lets.

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# Transport



Lambeth

Transport has an impact on many aspects of our lives from where we choose to live, work and study to our health and the air we breathe. Population growth in Lambeth will put pressure on the transport network and our current policies need to change to respond to this. While we do not control public transport services in the borough we need to be clear about what improvements are needed and ensure these are delivered. We do have control over most of the roads in Lambeth and our policies will have a direct impact on how we manage these.

We are reviewing policies affecting both new development and wider policies affecting the whole borough and bringing these together in a new Transport Strategy. Lambeth Local Plan transport policies need to support implementation of the new Transport Strategy.



## What you told us

- We should encourage people to walk, cycle and use public transport rather than travel by car.
- Improvements required include, increasing step-free access to public transport and adding electric vehicle charging points and bus lanes.
- Local streets should be protected from 'rat running' traffic.
- Public transport is not always reliant or efficient, is often overcrowded and parts of the borough are not adequately served.
- Greater priority should be given to buses.
- If existing rules were enforced and traffic calming measures were implemented, road danger would be reduced, for example in relation to speeding and running red lights.
- Parking controls should be used to manage the demand for parking and alternative uses of the kerbside should be considered, including cycle routes and wider pavements for pedestrians.
- New development should be car free except for disabled parking, with there being recognition that the used of private vehicles is sometimes necessary for those who are disabled, elderly or ill.



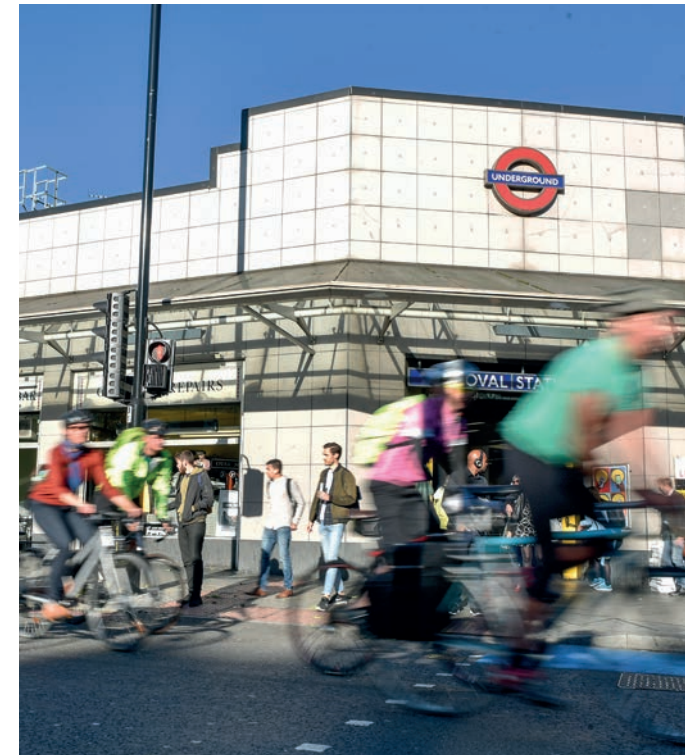
# Transport

## What our evidence tells us

- The vast majority of current trips are made using non-car modes of transport.
- Access to public transport is generally good in the borough and reliance on cars is generally low, though a lack of step free access at railway and underground stations acts as a barrier for those with disabilities and access needs.
- The capacity, frequency, accessibility and reliability of public transport services is variable and should be improved across Lambeth, particularly where growth is expected.
- Population growth in the north of the borough will result in increased traffic levels, despite low levels of car ownership, unless further action is taken.
- The most effective ways to accommodate growing demand on the Lambeth's road network are prioritising space-efficient modes of transport (walking, cycling and buses) and encouraging efficient movement of goods.
- The new London Plan and Mayor's Transport Strategy want most new development to be car-free and encourage sustainable transport modes.

## What we are proposing to do

- Apply new London Plan policies on walking, cycling and public transport.
- Adjust Local Plan policies to promote sustainable means of transport and discourage trips made by private vehicles.
- Supplement new London Plan policies with locally specific policies for car parking and cycle parking.
- Ensure new development contributes in some parts of the borough to the delivery of our Healthy Routes Network.
- Identify the transport infrastructure necessary to support Lambeth's growing population.
- Integrate the appropriate planning policies with the Lambeth Transport Strategy 2019 so that our strategic vision for transport in the borough can be achieved.
- Ensure that adequate disabled parking is provided and support the provision of step free access at railway and underground stations.



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# Improving air quality

Poor air quality in Lambeth is detrimental to health, particularly for older people, children, those with heart and lung conditions and those living in areas with higher levels of deprivation.

Planning policies need to address air pollution caused by the construction and operation of residential and commercial buildings in the borough. Developers should mitigate the negative impacts of their developments on air quality. This needs to work alongside other policies that contribute to improving air quality, such as on transport, green infrastructure and waste.



## What you told us

- Poor air quality is a concern across many parts of Lambeth.
- Major developments, developments in areas of poor air quality and developments that could increase road traffic on busy roads should be accompanied by an Air Quality Assessment.
- Measures that would improve air quality include tree planting and more green infrastructure, encouraging public transport and making car use more difficult, and enclosing construction sites in order to contain emissions.

## What our evidence tells us

- The entire borough is an Air Quality Management Area due to nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>) emissions exceeding acceptable limits.
- There are five Air Quality Focus Areas in Lambeth due to their high levels of pollution and human exposure, all lying across major transport corridors. These are the A23 from Brixton to Streatham; Kennington Oval/Camberwell New Road (A202)/Kennington Park Road (A3); Vauxhall Cross; Clapham Road (A3); and Waterloo Road.
- The main sources of emissions in the borough are road transport, residential and commercial buildings and construction sites.
- Poor air quality has greater negative impacts on vulnerable people such as the old, young and those with health conditions.





# Improving air quality

## What we are proposing to do

- We think the new London Plan policy on air quality sets out a good approach for Lambeth – so we propose to use this to assess planning applications in the borough.
- The new London Plan policy requires Air Quality Assessments for all major developments and requires all developments to be at least Air Quality Neutral. Developments in Opportunity Areas like Waterloo and Vauxhall must be Air Quality Positive.
- Other Local Plan policies on transport, environment, green infrastructure and waste will also contribute to improving air quality in the borough.
- Make developers aware of Lambeth's Air Quality Focus Areas and the location of 'sensitive receptors' like schools, nurseries and old people's homes, so these are taken into account when they design developments.

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# Waste



Lambeth

People, businesses and new development generate waste. The Mayor of London wants as much waste as possible to be managed in London and diverted away from landfill outside of the capital. The London Plan sets a target for the amount of waste each London borough must manage, so Lambeth's Local Plan must identify enough capacity to meet this target.

### What you told us

- Broader areas (like Key Industrial and Business Areas) – not just specific sites – should be considered for new waste management uses.
- Replacement waste sites should sometimes be allowed outside Lambeth, if the replacement is elsewhere in London and we can secure the right guarantees from the Mayor of London about meeting Lambeth's waste management target.
- The four Western Riverside Waste Authority boroughs can plan more effectively for managing waste together than as individual boroughs.

### What our evidence tells us

- Waste management businesses wanting to locate in Lambeth are more likely to be smaller scale materials re-use type operations rather than larger, noisy waste facilities. Recycling rates in Lambeth are improving.
- There is a need to identify about 1.9 hectares of additional land for waste management in the borough to meet the new waste target.
- There are currently eight sites safeguarded for waste management use in Lambeth.
- There is enough space in Key Industrial and Business Areas to meet the London Plan target over the period of the new Lambeth Local Plan, taking account of vacancy and churn.
- Not all the boroughs in the Western Riverside Waste Authority area want to plan jointly for waste and pool waste apportionments, so Lambeth must continue to plan for its own needs.





# Waste

## What we are proposing to do

- Continue to safeguard waste management sites in Lambeth, allowing for change of use where replacement capacity in Lambeth is provided.
- Lobby the Mayor to allow Lambeth's waste apportionment to be off-set if replacement provision is provided outside the borough where a Lambeth waste site is proposed to be lost.
- Identify Key Industrial and Business Areas as areas suitable for additional waste management uses to meet the London Plan waste apportionment.
- Require major developments to demonstrate how they meet the Mayor's net zero-waste target through a circular economy statement.
- Continue to work closely with the other Western Riverside boroughs but plan to meet Lambeth's waste target in the borough.

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