



An  
Bord  
Pleanála

## **S. 6(7) of Planning and Development (Housing) and Residential Tenancies Act 2016**

### **Inspector's Report on Recommended Opinion ABP-311742-21**

---

<b>Strategic Housing Development</b>	258 no. residential units (127 no. houses, 131 no. apartments), creche and associated site works.
<b>Location</b>	Lands to the west of the N67 Road, Oranhill, Oranmore, Co. Galway.
<b>Planning Authority</b>	Galway County Council
<b>Prospective Applicant</b>	Roykeel Ltd.
<b>Date of Consultation Meeting</b>	07 <sup>th</sup> of February 2022
<b>Date of Site Inspection</b>	21 <sup>st</sup> of January 2022
<b>Inspector</b>	Karen Hamilton

## Contents

1.0 Introduction .....	3
2.0 Site Location and Description .....	3
3.0 Proposed Strategic Housing Development .....	3
4.0 Planning History.....	4
5.0 Relevant Planning Policy .....	5
6.0 Section 247 Consultation(s) with Planning Authority .....	7
7.0 Prospective Applicant’s Case .....	8
8.0 Planning Authority Submission .....	9
9.0 Irish Water (IW).....	13
10.0 The Consultation Meeting .....	14
11.0 Assessment.....	16
12.0 Recommended Opinion .....	16

## 1.0 Introduction

Having regard to the consultation that has taken place in relation to the proposed development and also having regard to the submissions from the planning authority, the purpose of this report is to form a recommended opinion as to whether the documentation submitted with the consultation request under section 5(5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 - (i) constitutes a reasonable basis for an application under section 4, or (ii) requires further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

## 2.0 Site Location and Description

- 2.1. The subject site is a large greenfield site located to the south east of the settlement of Oranmore, Co. Galway. The site is c. 1km from the centre of Oranmore and along the west of the N67 (Galway- Gort Road).
- 2.2. The site is bound to the north by a residential estate Coill Clocha. A road is currently under construction between the roundabout at the N67, to the east of the site, and the Coill Clocha estate. The extension of Coill Clocha and part of the road permitted (PL07.237219 and extended under Reg.Ref:15/1334, also owned by the applicant) is currently under construction.

## 3.0 Proposed Strategic Housing Development

- 3.1. The proposed development would comprise of 258 no. residential units, crèche facility, community facility, commercial/retail development (285m<sup>2</sup>) and associated works. Access into the site is via a new road permitted under permission PL07.237219 and extended under Reg.Ref:15/1334.

### 3.2. Development Parameters

Parameter	Description
Area	9.13 ha (net developable area 6.95ha).
Units	258 no. units

	(127 no houses & 131 no. apartments)
Density	37.11 uph
Crèche & community centre	407m <sup>2</sup>
Retail	3 no. units (2 within apartment Block 2 each 89.38m <sup>2</sup> and a third in corner unit 104.5m <sup>2</sup> ).  Total: 285m <sup>2</sup>

### 3.3. Unit Mix

Unit	Houses	Apartments	Total	Approx. Percentage
1 bed	/	37	37	14%
2 bed	6	88	94	36%
3 bed	81	6	87	34%
4 bed	40	/	40	16%
Total	127	131	25	100%

## 4.0 Planning History

### 4.1. Subject site

#### **PL07.237219 (Reg Ref 09.1925) (extended under Reg.Ref:15/1334 to 12/2021).**

Permission for a mixed-use development including 161 residential units, commercial/retail and mixed-use development.

A north/south link between Coill Clocha estate to the north (which has been taken in charge by Galway County Council) and the Orancourt / Oranhill housing estate to the south (Oranmore distributor road).

A roundabout at the development site access to the Oranmore north/south distributor road will also link to an east/west spur within the adjoining development permitted under PL07.237219 and connecting to the existing Rocklands roundabout on the N67.

#### 4.2. Adjacent site to the west

##### **ABP 304203-19 (SHD application)**

Permission granted for 212 no. residential units, creche facility and associated site works. An EIAR and NIS were submitted with the application.

##### **ABP-301952-18**

Permission refused for the construction of 212 no. residential units, crèche, new vehicular and pedestrian access from North-South Oranmore Distributor Road permitted under PL07.237219 and extended under Reg.Ref:15/1334 and all associated site works.

The reason for refusal related to the impact on the European Sites within the vicinity and the absence of sufficient information in the Natura Impact Statement to assessment the impact on the bird species in Inner Galway Bay SPA (Site Code: 004031) and the Cregganna Marsh SPA (Site Code: 004142).

#### 4.3. Adjacent site to the south

##### **ABP 312381-22 (Reg Ref 21/408)**

Permission granted for 43 no. residential units and associated works and currently on appeal with the Board.

## 5.0 **Relevant Planning Policy**

### 5.1. **Galway County Development Plan 2015-2021**

- The overall development plan approach is based on promoting the development of Galway City and the associated Galway Metropolitan Area (GMA) along with the development of key towns and smaller villages along strategic development corridors focussed on transportation routes.
- The core strategy identifies Oranmore as a 'key town' at the edge of the GMA, which is at the top of the settlement hierarchy.

- Key towns are at the 4th tier of the settlement strategy with populations > 1,500.

## 5.2. Oranmore Local Area Plan 2012-2022

The Oranmore LAP 2012 has been extended from 2017 to 2022.

The originally allocated population growth of 1,170 additional persons and housing land requirement of 22.67 ha have been incorporated into the core strategy of the current county development plan.

### Zoning:

The majority of the site is zoned 'R1', 'Residential Phase I', Community Facilities to the southwest corner and some of the western margins zoned 'OS', 'Open Space / Recreation and Amenity'.

### **Residential Phase I (R1)**

- Lands phased for residential development within the lifespan of the plan.
- Objective RD1 – Phased Residential Development (Refer to Map 1A/1B Land Use Zoning)

Section 3.1.3 provides the following standards for residentially zoned lands:

- Plot ratio 0.10 to 0.50
- 50% maximum site coverage
- 15% minimum public open space

It also repeats residential density standards set out in Development Plan Table 13.1 in relation to densities.

### **Community Facilities (CF)**

Policy CF 1 – Community Facilities and Amenities: It is the policy of the Council to support the provision of an adequate level and equitable distribution of community facilities and amenities in the plan area that:

- Meets the needs of the local community as they arise and as resources permit.

- Are located in appropriate, accessible locations to serve the residential population in the plan area.
- Are clustered or linked together wherever facilities and amenities are complementary, and it is practicable to do so, to allow for shared and multi-purpose use of facilities.

## 6.0 Section 247 Consultation(s) with Planning Authority

6.1. The PA submission includes minutes from one S.247 meeting on the 06<sup>th</sup> of July 2021, as summarised below.

- The site is not located within an area identified as at risk of flooding.
- The proposal exceeds the population allocation for Oranmore, as per the Core Strategy.
- Only convenience retail of an appropriate scale will be accepted within the residential zoning.

### Density

- The site is most closely aligned to the “Inner Urban Suburbs” location and appropriate densities are 5-15 uph. The proposed density of 37.06 uph exceeds the density parameters for such areas in the Oranmore LAP.
- In the context of the national residential guidelines the site may be defined as an edge of centre site where densities from 20-35 are considered appropriate. The proposed density at 37.06 uph exceeds this density requirement.
- The Galway Metropolitan Area (MASP) includes a default rate of 35 uph for areas not included in the higher density of 50 uph.
- The national apartment guidelines allow densities at such locations as this at > 45 uph (peripheral and/or less accessible Urban Locations).

### Community Facilities & Services

- The area is well served and has a high degree of pedestrian and cycle accessibility.

### Mobility, Modal Split, Roads and Transport

- The access, via a permitted residential development, will be completed as part of phase 1 of this development or as part of an extant permission.
- The TTA should take into account construction traffic.
- Further details for sequencing etc should be provided at stage 2.

#### Placemaking, Architecture and Urban Design.

- There is a high degree of building uniformity and the proposal does not compliment the character or setting of the area or comply with the objectives of the CDP or LAP.
- Compliance with Section 3.5 of the building height guidance is questionable.
- The street pattern does not comply with DMURS (cul-de-sac approach)
- The public open space is not best located.
- The central point blocks doe does not define or enclose urban space or streets.
- There is too much incidental open space.

## **7.0 Prospective Applicant's Case**

### **7.1. Statement of Consistency**

The applicant's Statement of Consistency notes the national, regional and local planning polices relevant to the development of the site.

### **7.2. Statement of Material Contravention**

7.3. The applicant has submitted a Statement of Material Contravention in respect of the following issues:

#### **7.3.1. Core Strategy**

- Variation No. 1 of the CDP allocates a population for Oranmore/ Garraun of 1,170 persons and 34 ha for 363 units (indicative density 16 uph).
- The total units granted in Oranmore is 601.



- The number of units delivered in Oranmore in the current CDP is 117, there is 440 units extant.
- The permitted etc. units currently exceeds the Core Strategy allocation (363units) by 452 units on Residential Phase 1 zoned lands in Oranmore.
- A new Core Strategy for Oranmore was included in the Draft CDP (2022-2021) in July 2021 and it provides an additional CS allocation of 616 units for Oranmore.

### 7.3.2. Density

- The proposed density is 37.11 uph.
- The Oranmore LAP provides an indicative density of 16 uph.
- The density is considered appropriate for the site having regard to the location of Oranmore in the Galway Metropolitan Area and the national guidance.

### 7.3.3. Dual Aspect Ratios

- The scheme proposed 131 no. apartments (64% will have dual aspect or greater).
- Total of 49% will have dual aspect or greater.
- SPPR 4 of the apartment guidance requires 33% in central or accessible urban locations and 50% in suburban or intermediate locations.

## 8.0 Planning Authority Submission

8.1. In compliance with section 6(4)(b) of the 2016 Act the planning authority for the area in which the proposed development is located, Galway County Council, submitted their opinions in relation to the proposal on the 14<sup>th</sup> of December 2021. The opinion noted the S. 247 meetings in relation to the proposed SHD development, the planning history on the site and surrounding area, and the policy background. This opinion has been summarised below:

### 8.1.1. Environmental Assessments.

- The PA note the submission of an Environmental Impact Assessment, an Appropriate Assessment, and a Flood Risk Assessment.
- Comments on the Ecological Impact Assessment do not include a full assessment

### 8.1.2. Principle and Development Strategy

#### Core Strategy

- DM Objective LU1 of the LAP refers to densities of 15-35 uph.
- The Statement of Material Contravention states that the proposal represents a material contravention
- The location of the site is appropriate to higher densities although the design does not lend for efficient land use/ sustainability and compact urban form.
- It is not considered the allocation of population for Oranmore conflicts with the current GCDP.
- The Draft CDP is not an adopted policy document.

#### Land Use Zoning & Principle

- Apartments are only open for consideration under the land use zoning matrix.
- Only convenience retail which would not impact the vitality of residential uses can be accepted.
- Community support facilities are only open for consideration on the community zoned lands.

#### Density

- It is considered the density range of 20-35 is appropriate for a transitional site such as this.
- The proposed density at 37.11 uph exceeds the density threshold in the residential development guidelines.
- RSES and MASP includes a default of 35 uph for areas outside the existing neighbourhoods.
- The apartment guidelines support > 45 uph on sites such as these.

- Given the slight exceedance of 35 uph it is questionable if the density is a material contravention.

#### Apartment Use

- Apartments are only for consideration under the Residential zoning
- Justification is required to permit the apartments.
- The applicant has not included any justification for the apartments.

#### Community Facilities and Services

- A crèche facility incorporating a community room (42m<sup>2</sup>) is not a sufficient use of community zoned lands.
- There should be a high degree of pedestrian and cycle accessibility to the community focal point.

#### Childcare Facilities

- It is stated that the childcare facility will have capacity for 69 no. children with 4 no classrooms proposed.
- The provision of childcare facilities should have regard to the existing geographical demographic profile (current demand/supply).

#### Educational Facilities

- A schools capacity assessment has been provided as Section 7.8 of the Planning Report
- The use of schools outside the LAP area would lead to unsustainable development.
- It is the understanding of the PA that the schools within Oranmore may be at capacity.
- The community zoned lands could potentially be used as a school site.

#### Retail Development

- Three retail units are proposed on the ground floor of the apartments (two are 89.3m<sup>2</sup> and a third corner unit is 104.5m<sup>2</sup>).
- Retail use should be commensurate with the level of use diversity including retail use.

#### Mobility Strategy

- Traffic and Transportation Assessment (TTA) requires additional information including, projection/ VMT analysis (vehicle miles travelled), walk scoring or public transport usage projections and modal split between various mobility modes
- The balance of mobility will be predominantly weighted towards private car-based transportation and should include other options.
- There are network discontinuities in the footway and cycle network between the site of the prospective development and Oranmore town centre.

#### Green Network & Biodiversity

- The submission from the DAU highlights the need to provide steppingstones to support the Natura 2000 Network and should be recognised in the layout.
- There is a southeast- northwest connected network of green spaces in the southern section of the site which could potentially serve this function (question over the internal road).
- A more nature-based approach to dealing with the surface water is required.

#### Placemaking & Urban Design

- The design in Section 3.5 of the building height guidelines is noted. It is questionable if the criteria have been met (good sense of enclosure and legible streets, square and parks and a strong sense of urban neighbourhood).
- The distinctiveness, including a move away from a cul-de-sac approach, has not been met (DMURS).
- The applicant has not exploited the public open space opportunity from the adjacent SHD development to the west.
- It is questioned if the urban character areas compliment the urban character and setting.
- The location of the apartment blocks does not sufficiently create, define or enclose the urban space or street.

## Part V

- The applicant shall demonstrate how they comply with the new Part V requirements (date of land purchase).

## Archaeological Heritage

- There are SMR/RMP designations on nearby lands.
- The applicant was advised that an Archaeological and Cultural Heritage Impact Assessment is required.

## Phasing

- A phasing programme is required.

## 9.0 **Irish Water (IW)**

9.1. A submission received from IW on the 19<sup>th</sup> of November 2021 confirmed feasibility for 258 no. residential units subject to the following:

9.2. In respect of **Water & Wastewater**:

- Please note, suitably sized water and wastewater network(s) are currently being extended to this site boundary as part of a Connection Agreement for an adjoining development site (Irish Water Ref: CDS1900760801).
- These works are at construction stage nearing completion and will be Quality Assured by Irish Water.
- Connection(s) for the proposed development to these networks can be facilitated once these are commissioned and operational and will be subject to a Connection Agreement with Irish Water.
- In addition, a Drainage Area Plan (DAP) is currently underway, which includes an assessment of the Oranmore Pumping Station performance.
- The applicant shall engage with Irish Water ahead of any SHD application in order to agree any upgrades and/or works which may be required to facilitate the proposed development.

## 10.0 The Consultation Meeting

10.1. A Section 5 Consultation meeting took place at the offices of An Bord Pleanála on the 07<sup>th</sup> of February 2022, commencing at 10.00am, via Microsoft Teams.

Representatives of the prospective applicant, Galway County Council and An Bord Pleanála were in attendance. An agenda was issued by An Bord Pleanála prior to the meeting as detailed below:

1. Development Strategy, *inter alia*, design & layout, urban design response to the N67 and open space.
2. Justification for the density and the apartments.
3. Community Facilities.
4. Traffic & Transport, *inter alia*, access, permitted link road, mobility plan.
5. Drainage, *inter alia*, treatment of the surface water.
6. Irish Water, *inter alia*, connection and Oranmore pumping station.
7. AOB

10.2. In relation to the **Development Strategy**, An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following:

- The overall design and layout of the proposal, the interaction with the N67 and the need to ensure a strong urban edge with appropriate higher buildings along the edge.
- The design treatment around the roundabout and the need to ensure the key areas are not dominated by car parking.
- The location of the open space along the eastern boundary, adjoining the N67, the appropriate set back along the road and the need to ensure a buffer to protect the residential amenity for the future occupants.
- The external materials proposed, the coastal location and the need for maintenance.
- The existing permitted development along the west of the site, within the applicant's ownership, and the potential for connectivity into the proposed development.

- 10.3. In relation to the **Density and Apartments**, An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following:
- The review of the Galway County Development Plan 2015-2021 and the timescales for adoption.
  - The density (c.37uph) for the proposed development, the location of the site on the edge of Oranmore, the indicative density in the Oranmore Local Area Plan (16 uph), the national guidance for greenfield sites similar to the subject site and the submitted material contravention statement.
  - The location of the apartments within the overall development, the dual aspect calculation and market research justifying the apartment units within the proposal.
- 10.4. In relation to the **Community Facilities**, An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following:
- The inclusion of the crèche and community room on the community facilities zoned lands, the zoning objective, the quantum of community facilities and the need to demonstrate how these facilities will serve the wider community.
- 10.5. In relation to the **Traffic and Transport**, An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following:
- The proposed pedestrian and cycle connectivity from the site, north, from the site into Oranmore Town centre.
  - The information submitted in the TTA, the mobility management plan and the need for a modal split between various mobility modes.
- 10.6. In relation to the **Drainage and Irish Water Submission**, An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following:
- The design and layout of the surface water drainage and the positioning of soakaways beside the road's infrastructure.
  - The issues raised in the Irish Water submission including the existing Drainage Area Plan (DAP) currently being undertaken by IW on the performance of the Oranmore Pumping Station and the need to ensure the proposed site can be adequately serviced.

## 11.0 Assessment

11.1. Based on the entirety of the information before me, it would appear that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

I have examined all of the information and submissions before me including the documentation submitted by prospective applicants, the submissions of the planning authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the section 28 Ministerial Guidelines and local policy via the statutory plans for the area.

### Conclusion

I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that the documentation submitted with the consultation request under section 5(5) of the Act **requires further consideration and amendment in order to constitute a reasonable basis for an application** under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

## 12.0 Recommended Opinion

12.1. The Board refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an application under section 4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

Following consideration of the issues raised during the consultation process and having regard to the opinion of the planning authority, An Bord Pleanála is of the opinion that the documentation submitted requires further consideration and



amendment to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála

### Design Strategy

1. Further consideration and/or justification of the documents as they relate to the design approach of the proposed development and the need for a high quality, strong urban edge which integrates effectively along the N67. The further consideration/ justification should address the matters of the configuration, the layout and the architectural approach at the roundabout with particular emphasis on the carparking strategy and open space design to be given further consideration. Particular regard should be had 12 criteria set out in the Urban Design Manual which accompanies the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (May 2009) and the requirement for good design and the inclusion of a sense of place. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

### Community Facilities

2. Further Consideration and/or justification of the documents as they relate to the proposed facilities within the lands zoned for Community Facilities (CF). The applicant shall ensure the further consideration includes justification for the scale of facilities to be provided having regard to the existing capacity in Oranmore and Policy CF 1 of the Oranmore Local Area Plan which requires the delivery of community facilities necessary to meet the needs of the local community. The further consideration/justification shall be accompanied by a Social and Community Audit which is based of verifiable facts.

12.2. Pursuant to article 285(5)(b)(i) and (ii) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that the following specific information should be submitted with any application for permission:

1. A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, pathways, entrances, boundary treatment/s and retail/ crèche area. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development. The documents should also have regard to the long-term management and maintenance of the proposed development and a life cycle report for the apartments in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2020).
2. A Phasing Plan clearly indicating the proposed development of the residential units, crèche, community and commercial uses in conjunction with the necessary infrastructure, including the road, water and wastewater.
3. A statement DMURS compliance regarding permeability and connections with existing street network; hierarchy of routes and street function; enclosure including building frontage, furniture and planting along streets; parking; widths of carriageways and footpaths; pedestrian crossing points; and types of junctions and corner radii. The internal road layout should require measures to avoid the use of parallel roads. The submitted documents should demonstrate specific compliance with the particular stated provisions of DMURS. Generalised assertions regarding principles are not sufficient.
4. Clarification in the documents with regards to the proposed wastewater services. In particular, the consideration/clarification should address the contents of the submission from Irish Water (dated 19<sup>th</sup> of September 2021) concerning the current assessment of the Oranmore Pumping Station and the associated Drainage Area Plan (DAP). Clarity is required at application stage as to what upgrade works are required, who is to deliver these works, when are the works to be delivered relative to the completion of the proposed housing development and whether such upgrade works are to be the subject of separate consent processes.

5. A response to the Traffic and Transport issues raised in the Galway County Council submission in relation to, *inter alia*, pedestrian and cycle connectivity into Oranmore, road safety audit.
6. A response to the Drainage Department issues raised in the Galway County Council submission in relation to the delivery of SuDS on the site.
7. A Sunlight/Daylight/Overshadowing analysis including all relevant plans/documentation showing an acceptable level of residential amenity, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development and in adjacent properties. This report should address the full extent of requirements of BRE209/BS2011, as applicable.
8. Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective(s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format. The notice and statement should clearly indicate which Planning Authority statutory plan it is proposed to materially contravene.
9. In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area. Such statement should have regard to the development plan or local area plan in place or, likely to be in place, at the date of the decision of the Board in respect of any application for permission under section 4 of the Act.
10. The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018, unless it is proposed to submit an EIAR at application stage

12.3. Pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. Irish Water.
2. Transport Infrastructure Ireland.
3. National Transport Authority
4. Minister for Culture, Heritage and the Gaeltacht,
5. The Heritage Council,
6. An Taisce-the National Trust for Ireland.
7. An Comhairle Ealaoin,
8. Failte Ireland
9. The relevant Childcare Committee

**PLEASE NOTE:**

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

---

Karen Hamilton  
Senior Planning Inspector

08<sup>th</sup> of February 2022