

Comhairle Contae Chorcaí Cork County Council

Nora Hurley,
c/o Aidan Kelly,
Agri Design & Planning Services,
Molough,
Newcastle,
Clonmel,
Co. Tipperary.

Pleanáil agus Forbairt,
Halla an Chontae,
Bóthar Charraig Ruacháin,
Corcaigh T12 R2NC.
Fón: (021) 4276891
R-phost: planninginfo@corkcoco.ie
Suíomh Gréasáin: www.corkcoco.ie
Planning & Development,
County Hall,
Carrigrohane Road, Cork T12 R2NC.
Tel (021) 4276891
Email: planninginfo@corkcoco.ie
Web: www.corkcoco.ie



5th September 2024

REF: D/254/24
LOCATION: Banshy, Youghal, Co. Cork, P36 XF84.

**RE: DECLARATION OF EXEMPTED DEVELOPMENT UNDER SECTION 5 OF THE
PLANNING & DEVELOPMENT ACT 2000 - 2010.**

Dear Madam,

On the basis of the information submitted by you on 12th August 2024 the Planning Authority, having considered the question whether the construction of a proposed 198 sq. metre shed for housing cattle at **Banshy, Youghal, Co. Cork**, is or is not exempted development, has declared that it **is development and is exempted development.**

Reason for Decision

The Planning Authority in considering this referral had particular regard to:

- Sections 2 and 3 of the Planning and Development Act 2000, (as amended),
- Class 6 of Part 3 of Schedule 2 of the Planning and Development Regulations 2001-2023, (as amended), and
- The particulars received by the Planning Authority on 12th August 2024

And Whereas Cork County Council has concluded that –

The construction of a 198 sq. metre shed to house cattle at Banshy, Youghal, Co. Cork **is development and is exempted development.**

This exemption does NOT itself empower a person to carry out a development unless that person is legally entitled to do so.

Please note that under Section 5 Subsection 3(a) where a declaration is issued under this section, any person issued with a declaration under subsection 2(a) may, on payment to the Board of such fee as may be prescribed, refer a declaration for review by the Board within 4 weeks of the date of the issuing of the declaration.

Yours faithfully,


**KEVIN O' REGAN,
SENIOR EXECUTIVE OFFICER,
PLANNING DEPARTMENT.**

In order to process your query, it may be necessary for Cork County Council to collect Personal information from you. Such information will be processed in line with our privacy statement which is available to view at <https://www.corkcoco.ie/privacy-statement-cork-county-council>

PLANNER'S REPORT - Ref. D/254/24

Application Type: Section 5
Description: Shed for housing cattle.
Location: Banshy, Youghal.
Applicant: Nora Hurley

1.0 REQUIREMENTS FOR A SECTION 5 DECLARATION APPLICATION

Section 5(1) of the Planning and Development Act as amended states:

5.—(1) If any question arises as to what, in any particular case, is or is not development or is or is not exempted development within the meaning of this Act, any person may, on payment of the prescribed fee, request in writing from the relevant planning authority a declaration on that question, and that person shall provide to the planning authority any information necessary to enable the authority to make its decision on the matter.

2.0 THE QUESTION BEFORE THE PLANNING AUTHORITY

The following question to which this declaration relates is set out as follows by the applicant:

<p>The proposed shed will be housing cattle and be a CLASS 6 EXEMPTION STRUCTURE Total Proposed 198m2 class 6 which is under the 200m2 total allowed</p> <p>Is the proposed shed exempt</p>

3.0 SITE LOCATION AND DESCRIPTION

The subject site is located at the western extent of the town of Youghal within the townland of Banshy. These lands in use as agricultural fields are bound to the east by Pobalscoil na Tríonóide and to the west by Youghal Bypass (N25). The fields are enclosed by dense hedgerows set back from Parkmountain Road by a verge.

It is noted that these lands are zoned industry in the Cork County Development Plan 2022.



Image 1: Site Photo 20.08.2024

4.0 RELEVANT PLANNING LEGISLATION AND REGULATION

Planning and Development Act 2000, as amended

Section 2(1) of the Act defines “works” as follows:

“works” includes any act or operation of construction, excavation, demolition, extension, alteration, repair or renewal and, in relation to a protected structure or proposed protected structure, includes any act or operation involving the application or removal of plaster, paint, wallpaper, tiles or other material to or from the surfaces of the interior or exterior of a structure.

“alteration” includes—

(a) plastering or painting or the removal of plaster or stucco, or

(b) the replacement of a door, window or roof, that materially alters the external appearance of a structure so as to render the appearance inconsistent with the character of the structure or neighbouring structures;

Section 3 (1) of the Act defines “development” as follows:

“In this Act, “development” means, except where the context otherwise requires, the carrying out of any works on, in, over or under land or the making of any material change in the use of any structures or other land.”

The Planning and Development Act 2000 (as amended) provides the following definition of agriculture:

“agriculture” includes horticulture, fruit growing, seed growing, dairy farming, the breeding and keeping of livestock (including any creature kept for the production of food, wool, skins or fur, or for the purpose of its use in the farming of land), the training of horses and the rearing of bloodstock, the use of land as grazing land, meadow land, osier land, market gardens and nursery grounds, and “agricultural” shall be construed accordingly;

Planning and Development Regulations

<p>Agricultural Structures</p> <p>CLASS 6</p> <p>Works consisting of the provision of a roofed structure for the housing of cattle, sheep, goats, donkeys, horses, deer or rabbits, having a gross floor space not exceeding 200 square metres (whether or not by extension of an existing structure), and any ancillary provision for effluent storage.</p>	<ol style="list-style-type: none"> 1. No such structure shall be used for any purpose other than the purpose of agriculture. 2. The gross floor space of such structure together with any other such structures situated within the same farmyard complex or within 100 metres of that complex shall not exceed 300 square metres gross floor space in aggregate. 3. Effluent storage facilities adequate to serve the structure having regard to its size, use and location shall be constructed in line with Department of Agriculture, Food and Rural Development and Department of the Environment and Local Government requirements and shall have regard to the need to avoid water pollution. 4. No such structure shall be situated, and no effluent from such structure shall be stored, within 10 metres of any public road. 5. No such structure within 100 metres of any public road shall exceed 8 metres in height. 6. No such structure shall be situated, and no effluent from such structure shall be stored, within 100 metres of any house (other than the house of the person providing the structure) or other residential building or school, hospital, church or building used for public assembly, save with the consent in writing of the owner and, as may be appropriate, the occupier or person in charge thereof. 7. No unpainted metal sheeting shall be used for roofing or on the external finish of the structure.
--	--

Article 9(1) Restrictions on Exemption

“Development to which article 6 relates shall not be exempted development for the

purposes of the Act-

(a) If the carrying out of such development would-

(i) contravene a condition attached to a permission under the Act or be inconsistent with any use specified in a permission under the Act,

(ii) consist of or comprise the formation, laying out or material widening of a means of access to a public road the surfaced carriageway of which exceeds 4 metres in width,

(iii) endanger public safety by reason of traffic hazard or obstruction of road users,

(vii B) comprise development in relation to which a planning authority or An Bord Pleanála is the competent authority in relation to appropriate assessment because it would be likely to have a significant effect on the integrity of a European site,

6.0 ENVIRONMENTAL SCREENING

Environmental Impact Assessment

Section 4(4) states that:

(4) Notwithstanding paragraphs (a), (i), (ia) and (l) of subsection (1) and any regulations under subsection (2), development shall not be exempted development if an environmental impact assessment or an appropriate assessment of the development is required.

Having regard to the contents of Article 103 of Schedule 7 of the Planning and Development Regulations 2001, as amended it is considered that the proposed development by reason of the nature, scale and location would not be likely to have a significant effect on the environment. Accordingly, an EIA is not required.

Appropriate Assessment

Section 177U (9) states that:

“In deciding upon a declaration for the purposes of Section 5 of this Act a planning authority or the Board, as the case maybe, shall where appropriate, conduct a screening for appropriate assessment in accordance with the provisions of this section.”

A preliminary screening accompanies this Section 5. Stage 2 AA is not required.

7.0 RECENT RELEVANT PLANNING HISTORY



8.0 INTERNAL REFERRAL REPORTS

Archaeology	21.08.2024	The site is not located adjacent to any Recorded Monuments or within the Zone of Archaeological Potential or Statutory Zone of Notification for any RMPs.
Environment	23.08.2024	The proposed shed appears to meet the Conditions & Limitations for a Class 6 Exempted Development.

9.0 PLANNING ASSESSMENT

Is or is not development?

The first issue for consideration is whether or not the matter at hand is 'development' which is defined in Section 3(1) and 'works' is defined in Section 2(1) of the Act. It is considered the construction of an agricultural building would constitute development within this definition. Therefore, this referral falls within the definition of 'development'.

Is or is not exempted development?

The second aspect to consider in this referral is whether or not the development is or is not exempted development. of agriculture:

"agriculture" includes horticulture, fruit growing, seed growing, dairy farming, the breeding and keeping of livestock (including any creature kept for the production of food, wool, skins or fur, or for the purpose of its use in the farming of land), the training of horses and the rearing of bloodstock, the use of land as grazing land, meadow land, osier land, market gardens and nursery grounds, and "agricultural" shall be construed accordingly

The applicant has provided details of the proposed use of the agricultural building. It is proposed to house 15 cattle aged 1 – 2yrs in the shed with slurry/effluent to be collected to a slatted slurry tank under the shed. This is in compliance with limitation 1.

Limitation 2 states that the gross floor space of such structure together with any other such structures situated within the same farmyard complex or within 100 metres of that complex shall not exceed 300 square metres gross floor space in aggregate. The proposed structure is 198sq.m and isn't located adjacent to other similar such structures which would breach this threshold.

I note from the report of the Environment Officer that slurry/effluent is to be collected to a slatted slurry tank under the shed. The development is therefore in compliance with limitation 3.

The structure is proposed c. 70m from the public road, this greater than 10m and in compliance with limitation 4. While the structure is within 100m of a public road, its height is less than 8m (7.1m) and therefore in compliance with limitation 5.

The nearest third-party dwelling is more than 200m from the site of the proposed shed. Pobalscoil na Tríonóide is located c.180m east of the proposed shed.

Gray/green metal sheeting is proposed. The details submitted confirm that no unpainted metal sheeting shall be used for roofing or on the external finish of the structure.

10.0 RECOMMENDATION

Based on my assessment above I consider that the 'construction of a 198 sq. metre shed to house cattle' constitutes **development that is exempted development**.

In considering this referral, regard has been had to:-

- (a) Sections 2 and 3 of the Planning and Development Act, 2000 (as amended);
- (b) Class 6 of Part 3 of Schedule 2 of the Planning and Development Regulations, 2001 (as amended).



Siún McCarthy
Executive Planner
04.09.2024



Molough,
Newcastle,
Clonmel,
Co. Tipperary.
09 Aug. 24

Section 5
Schedule list



Client:
Nora Hurley

Address;
Banshy, Youghal, Co. Cork, P36XF84

Proposal;
Permission to construct slatted shed and all associated site works

Documentation:

Drawings

Sheet no.	Title	Scale	Size	Quantity
01	site layout			
02	Floor plan	1:500	A2	4
		SEE PAGE	A3	4

Maps

Sheet no.	Title	Scale	Size	Quantity
05	Site location map			
06	Site location map	1:10560	A4	4
		1:2500	A4	4

Application form and checklist

4

Regards

Aidan Kelly B.Arch B.sc Arch Tech B.Agr



CORK COUNTY COUNCIL APPLICATION FOR SECTION 5 DECLARATION OF EXEMPTION

APPLICANT CHECKLIST

- 4 No. Copies of Application Form:
- 1 No. Copy of Contact Details:
- 4 No. Copies 6" O.S. Maps:
- 4 No. Copies 25" O.S. Maps:
- 4 No. Copies of Site Layout Plan:
- 4 No. Copies Scaled Drawings of Development:
- €80 Application Fee:

(Please tick ✓)

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

FOR OFFICE USE ONLY

Receipt No.	PL20002403
Cash/Cheque/ Credit Card	CARD
Date	13/8/24
Declaration Ref. No.	D/254/24

Planning Department

12 AUG 2024

Cork County Council
County Hall
Cork

DATE STAMP HERE

You should make sure that you are satisfied that any information/documentation that you submit is appropriate to be viewed by the public. Please do not submit any information that you do not want 3rd parties to view.

In the case of a Declaration of Exemption for Land Reclamation, the following additional information is required:

- A copy of the details submitted to the Council's Environment Department (Inniscarra) for a Waste Licence Permit
- Correspondence from Teagasc (detailing how the land reclamation would benefit the land in question for agricultural purposes)
- Details of existing and proposed levels
- Details of fill material and duration of fill.

DATA PROTECTION

The planning process is an open and public one. In that context, all applications for Declarations of Exemption are made available for public inspection.

Personal information collected by Cork County Council is done so in order for us to process your application for a Section 5 Declaration of Exemption. Legally we can process this information as it is necessary for us to comply with our statutory/legal obligations. The protection of our personal data is a key priority for the Council and your data will be processed in line with our Privacy policy which is available at <http://www.corkcoco.ie/Privacy-Policy> or hardcopy from our offices at County Hall, Carrigrohane Road, Cork, Ireland. Should you have any questions about our privacy policy or the information we hold about you, please contact us by email to dpo@corkcoco.ie or write to us at Data Protection Officer, Cork County Council, County Hall, Carrigrohane Road, Cork, Ireland.

4.

APPLICATION DETAILS:

Answer the following if applicable. Note: Floor areas are measured from the inside of the external walls and should be indicated in square metres (m²)

(a) Floor area of existing/proposed structure(s):	198m ² class 6 proposed Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
(b) If a domestic extension is proposed, have any previous extensions/structures been erected at this location after 1 st October, 1964 (including those for which planning permission has been obtained):	If yes, please provide floor areas (m ²) and previous planning reference(s) where applicable:
(c) If a change of use of land and/or building(s) is proposed, please state the following: Existing/previous use _____ _____ _____ Proposed use N/A _____ _____	
(d) Are you aware of any enforcement proceedings connected to this site?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, please state relevant reference number(s):

5. LEGAL INTEREST OF APPLICANT IN THE LAND/STRUCTURE:

Please tick appropriate box to show applicant's legal interest in the land or structure:	A. Owner <input checked="" type="checkbox"/>	B. Other <input type="checkbox"/>
Where legal interest is "Other", please state your interest in the land/structure:	Planning Department	
If you are not the legal owner, please state the name of the owner/s (address to be supplied at Question C in Contact Details):	12 AUG 2024 Cork County Council County Hall CORK	

6. PROTECTED STRUCTURE DETAILS / ARCHITECTURAL CONSERVATION AREA:

Is this a Protected Structure/Proposed Protected Structure or within the curtilage of a Protected Structure: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
If yes, has a Declaration under Section 57 of the Planning & Development Act 2000 been requested or issued for the property by the Planning Authority: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
If yes, please state relevant reference No. _____	
Is this site located within an Architectural Conservation Area (ACA), as designated in the County Development Plan? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

7. APPROPRIATE ASSESSMENT:

Would the proposed development require an appropriate assessment because it would be likely to have a significant effect on the integrity of a European site (SAC, SPA etc)? Yes No

8. DATA PROTECTION DECLARATION:

In order for the Planning Authority to process the personal data you have provided, your consent is required. By ticking the box below, you consent to the Planning Authority processing the personal data provided by you in line with the terms of Cork County Council's Privacy Policy available at <http://www.corkcoco.ie/privacy-statement-cork-county-council> or in hardcopy from any Council office; and to having your information processed for the following purposes:

Processing of your Declaration of Exemption application by the Planning Authority

I give permission for my personal information to be processed for the purpose stated above

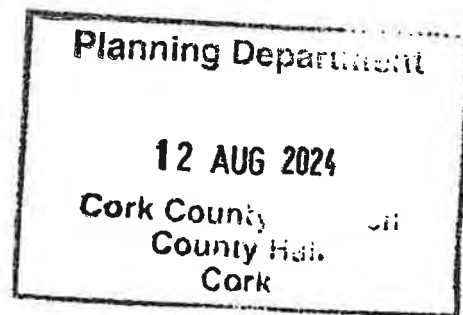
Signed (By Applicant Only)	Nora Hurley
Date	9-8-2024

GDPR Special Categories of data / Sensitive Personal data - Explicit Consent

Where Special Categories of personal data / sensitive personal data are provided as part of / in support of a declaration application, **explicit consent** to the processing of the special categories of data must be given by the person to whom the data refers, namely the Data Subject.

Special Categories of data / Sensitive Personal data include:

- Race
- Ethnic origin
- Political opinions
- Religion
- Philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Health data
- Concerning a natural person's sex life
- Sexual orientation



In order for the Planning Authority to process the sensitive personal data you have provided, your consent is required. By ticking the box below, you consent to the Planning Authority processing the personal data provided by you in line with the terms of Cork County Council's Privacy Policy available at <https://www.corkcoco.ie/privacy-statement-cork-county-council> or in hardcopy from any Council office; and to having your information processed for the following purposes:

Sensitive personal data being submitted in support of Declaration of Exemption Application

I give permission for my sensitive personal data submitted to the Planning Authority to be processed for the purpose stated above.

Signed	Nora Hurley
Date	9-8-2024

You have the right to withdraw your consent by contacting the Planning Department, Ground Floor, County Hall, Carrigrohane Road, Cork. Tel: (021) 4276891 Email: planninginfo@corkcoco.ie or by contacting the Planning Department, Norton House, Cork Road, Skibbereen, Co. Cork. Tel: (028) 40340 Email: westcorkplanninginfo@corkcoco.ie

However if consent to the use of personal data is withdrawn during the declaration of exemption decision-making process this information cannot be considered as part of the decision making process. Once a decision has been made, an applicant is not entitled to withdraw consent, as the right of erasure does not apply to a situation where processing is required for compliance with a legal obligation or for the performance of a task carried out in the public interest.

Please note that all information / supporting documentation submitted will be available publicly to view at the Planning Authority offices.

ADVISORY NOTES:

The application must be accompanied by the required fee of €80

The application must be accompanied by a site location map which is based on the Ordnance Survey map for the area, is a scale not less than 1:1000 and it shall clearly identify the site in question.


Sufficient information should be submitted to enable the Planning Authority to make a decision. If applicable, any plans submitted should be to scale and based on an accurate survey of the lands/structure in question. The application should be sent to the following address:

The Planning Department, Cork County Council, Floor 2, Co. Hall, Carrigrohane Road, Cork, T12 R2NC; or for applications related to the Western Division, The Planning Department, Cork County Council, Norton House, Cork Road, Skibbereen, Co. Cork, P81 AT28.

- The Planning Authority may require further information to be submitted to enable the authority to issue a decision on the Declaration of Exemption application.
- The Planning Authority may request other person(s), other than the applicant; to submit information on the question which has arisen and on which the Declaration of Exemption is sought.
- Any person issued with a Declaration of Exemption may on payment to An Bord Pleanála refer a Declaration of Exemption for review by the Board within 4 weeks of the date of the issuing of the Declaration of Exemption decision.
- In the event that no Declaration of Exemption is issued by the Planning Authority, any person who made a request may on payment to the Board of such a fee as may be prescribed, refer the question for decision to the Board within 4 weeks of the date that a Declaration of Exemption was due to be issued by the Planning Authority.

The application form and advisory notes are non-statutory documents prepared by Cork County Council for the purpose of advising the type of information which is normally required to enable the Planning Authority to issue a Declaration of Exemption under Section 5. This document does not purport to be a legal interpretation of the statutory legislation nor does it state to be a legal requirement under the Planning and Development Act 2000 as amended, or Planning and Development Regulations, 2001, as amended.

9. **I hereby declare that, to the best of my knowledge and belief, the information given in this form is correct, accurate and fully compliant with the Planning and Development Acts 2000, as amended and the Regulations made thereunder:**

Signed (Applicant or Agent as appropriate)	
Date	9-8-2024

Planning Department

12 AUG 2024
Cork County Council
County Hall
Cork

5



Molough,
Newcastle,
Clonmel,
Co. Tipperary.
09 Aug. 24

Section 5

Client:

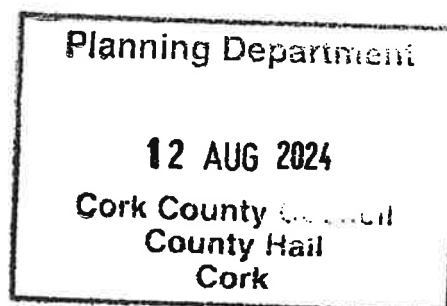
Nora Hurley

Address;

Banshy, Youghal, Co. Cork, P36XF84

Proposal;

Permission to construct slatted shed and all associated site works



1.
The plan is to winter 15 (1–2-year-old cattle) on the Proposed slatted tank on the property over the winter.

2.
The animals will be feed hay which will be stored in the shed with the animals

3.
Slurry storage requirement for 1–2-year-old cattle is 3m³ for 20 weeks slurry storage

15 cattle x 3m³ = 45m³ required for a 20-week slurry storage

4.

The loose area is a requirement from the department for a very sick animal. It will only be used if an animal becomes sick or is required to be removed from slatted area. The area will contain effluent channel to catch any run off and be piped back to existing slatted tank.

Any dung will be left in the shed till silage is cut in May and then be land spread by a contractor.

Any slurry in the slatted tank will also be land spread on silage ground in the month of May by a contractor

5.

The farm is 44ac. So 45m³ slurry generated is 9,898 Gallon. The rate for land spreading slurry is normally 2,000 gallon per acre so 5 ac is only required to take the slurry generated on the farm.

Planning Applications
Farmyard Design
Mobile 0857466211

Permission for Retention
Shed Designs
www.adps.ie

Paddock & Roadway Design
Site Surveys
aidankelly2000@yahoo.ie



All buffer zones will be maintained around the public water abstraction point located to the south of the farmyard.

6.

There will be green/Gray colour sheeting used on the proposed shed.

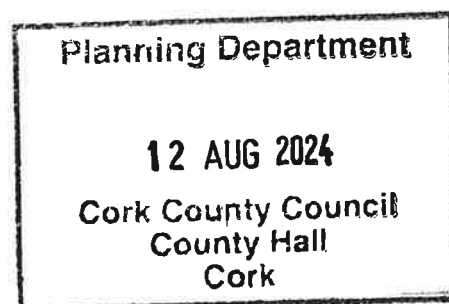
There will be no unpainted metal sheeting used

I can be contact at the number below up you have any other questions

Regards

A handwritten signature in black ink that reads 'Aidan Kelly'.

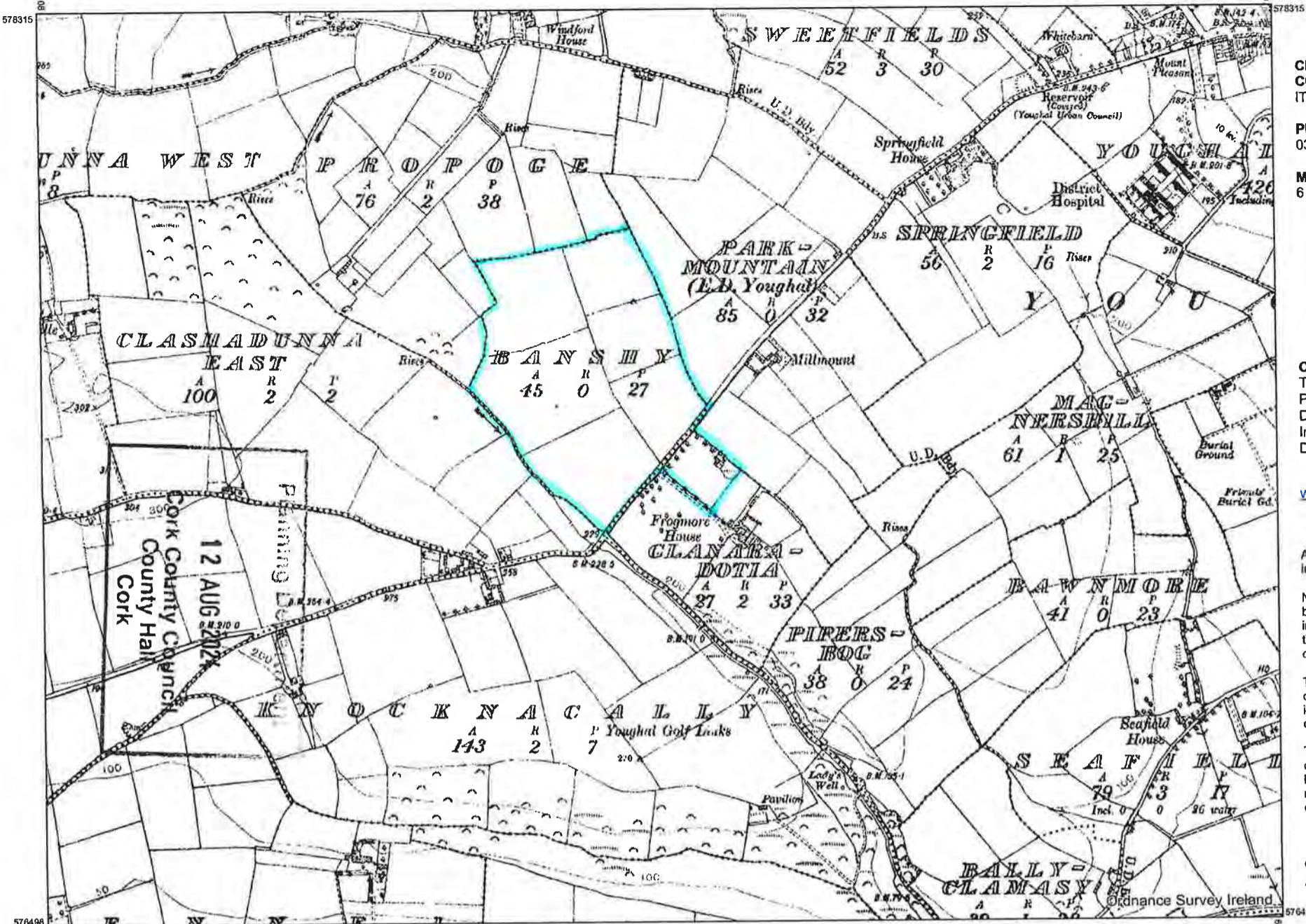
Aidan Kelly B.Arch B.sc Arch Tech B.Agr



Site Location Map



Tailte Éireann



CENTRE COORDINATES:
ITM 608639,577407

PUBLISHED: 03/08/2024

ORDER NO.: 50414641_1

MAP SERIES: 6 Inch Raster

MAP SHEETS: CK067

COMPILED AND PUBLISHED BY:
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Ireland.
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www.tailte.ie

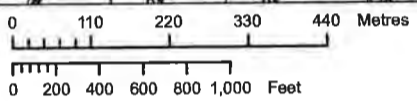
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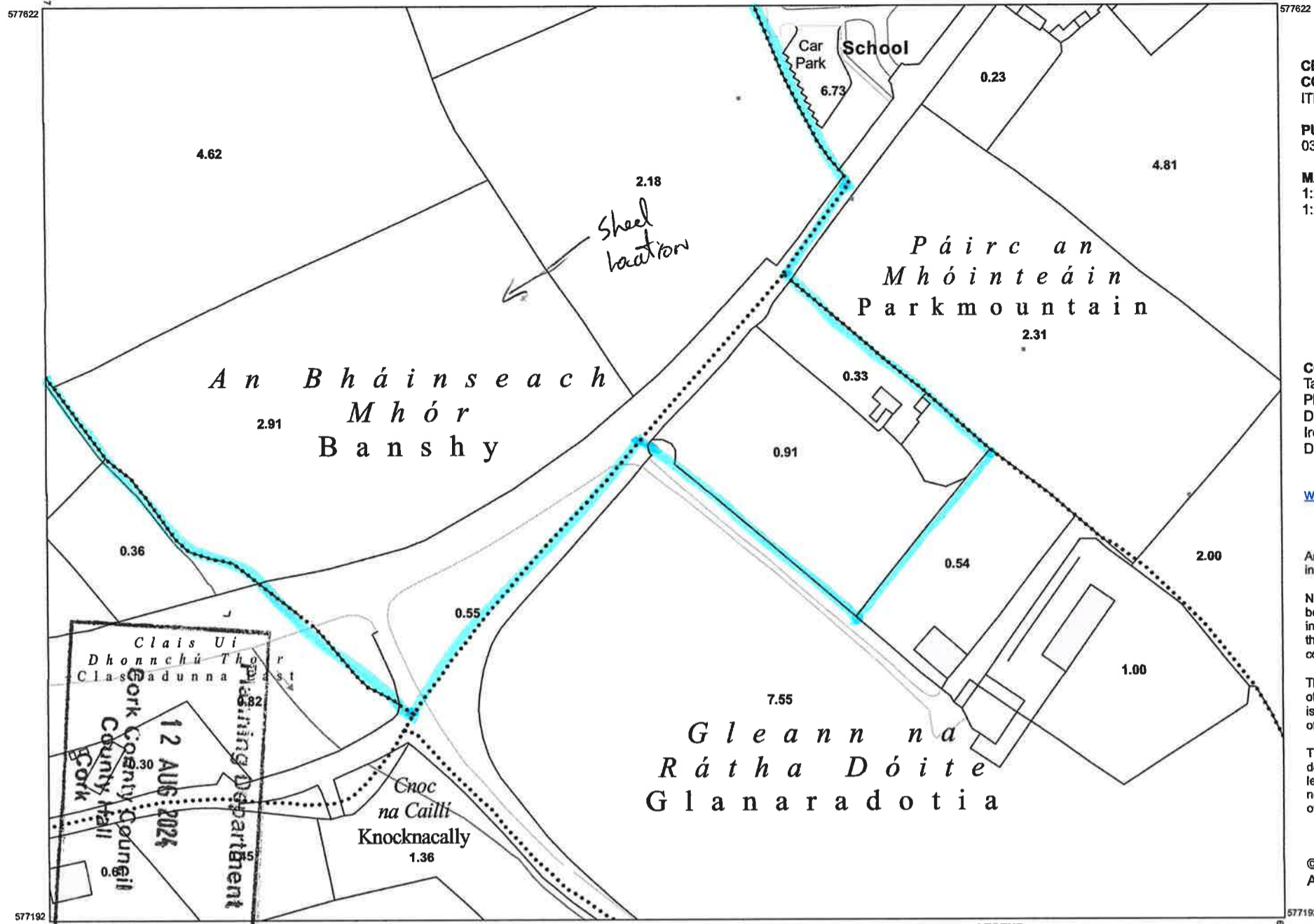
LEGEND:
To view the legend visit www.tailte.ie and search for 'Large Scale Legend'



Planning Pack Map



Tailte Éireann



CENTRE COORDINATES:
ITM 608639,577407

PUBLISHED: 03/08/2024

ORDER NO.: 50414641_1

MAP SERIES: 1:2,500
1:2,500

MAP SHEETS: 6301-A
6301-C

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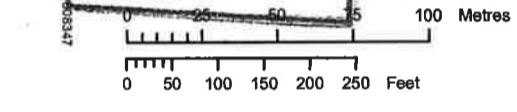
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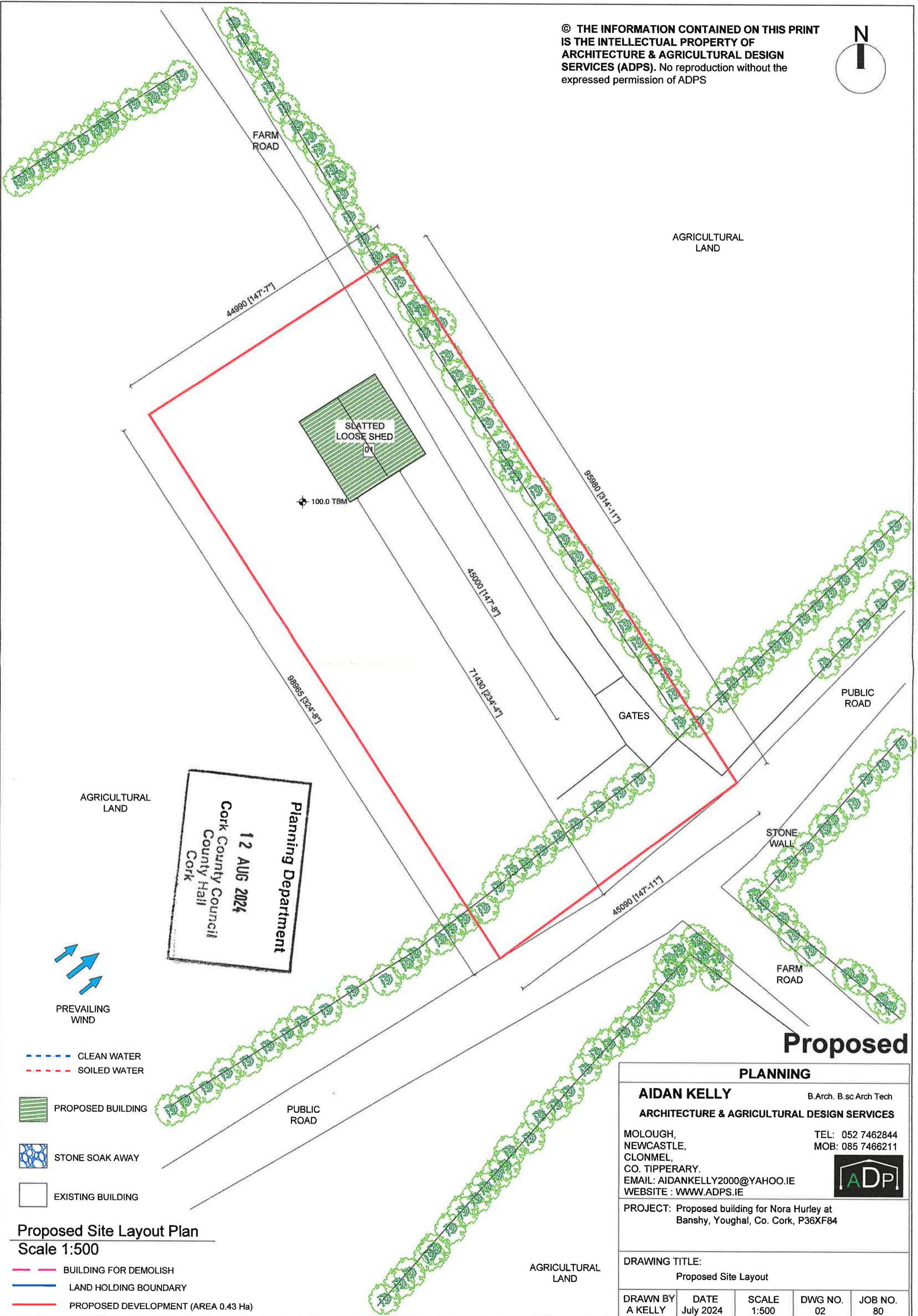
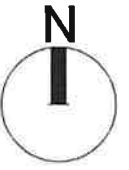
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CAPTURE RESOLUTION:
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LEGEND:
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Planning Department
12 AUG 2024
Cork County Council
County Hall
Cork

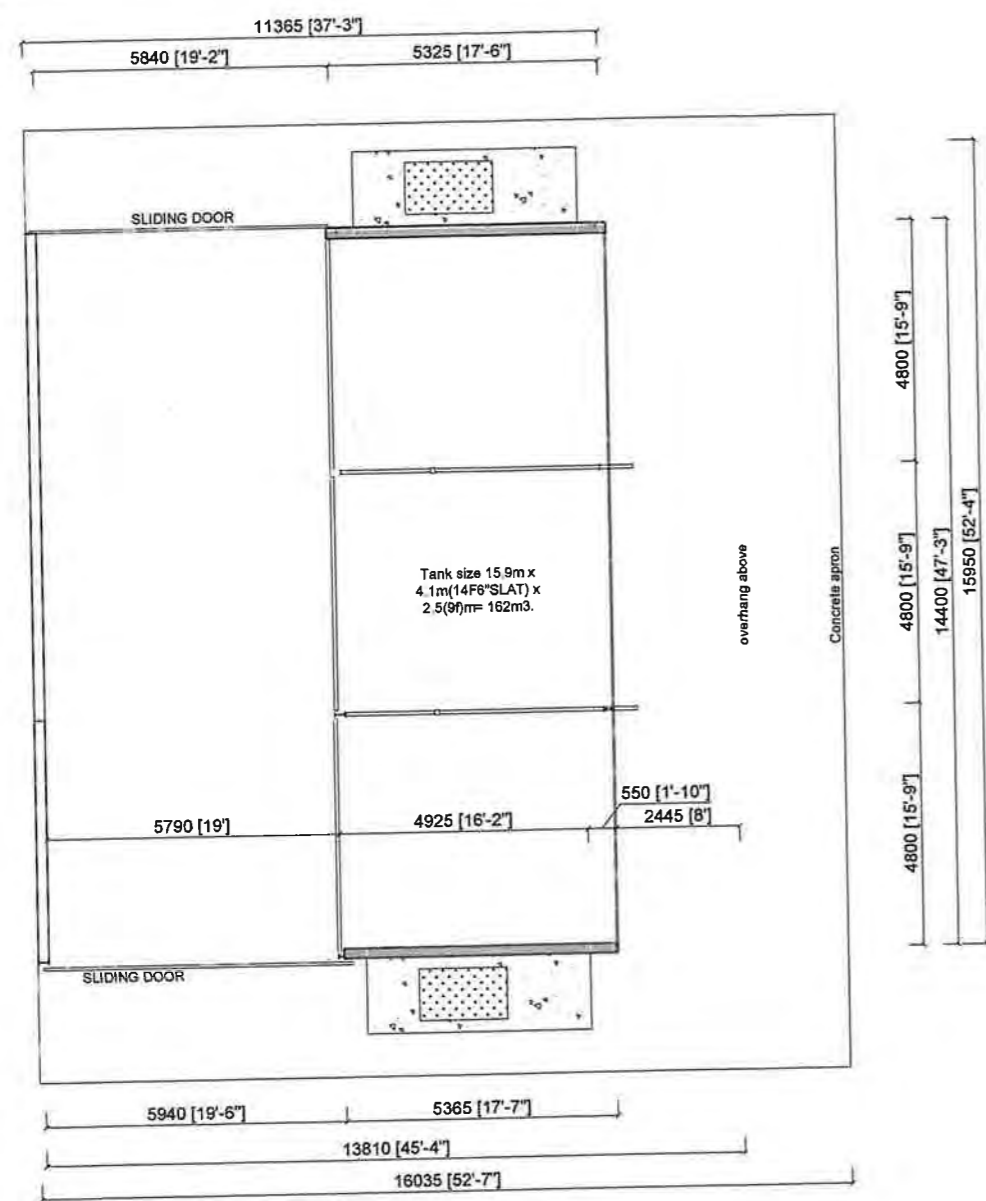
Proposed

- CLEAN WATER
- SOILED WATER
- PROPOSED BUILDING
- STONE SOAK AWAY
- EXISTING BUILDING

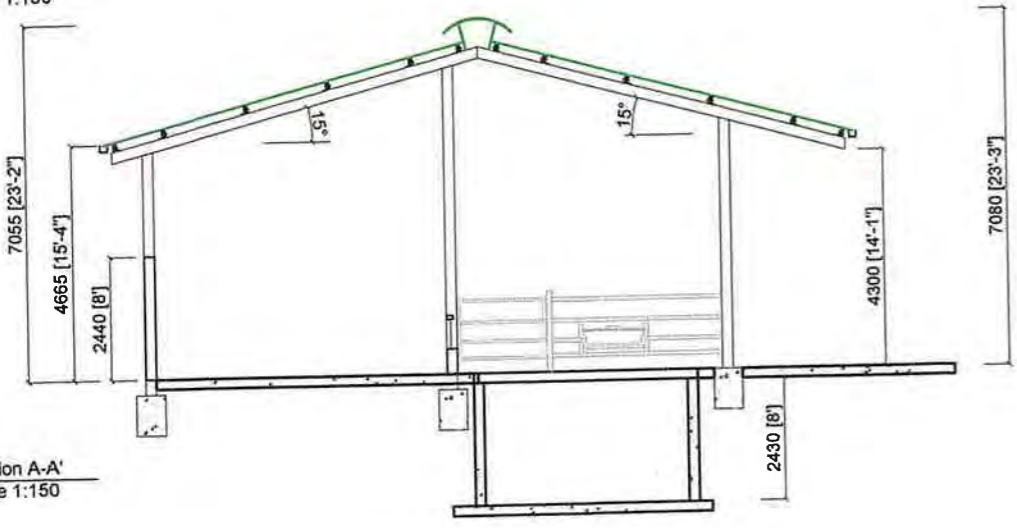
Proposed Site Layout Plan
Scale 1:500

- BUILDING FOR DEMOLISH
- LAND HOLDING BOUNDARY
- PROPOSED DEVELOPMENT (AREA 0.43 Ha)

PLANNING				
AIDAN KELLY		B.Arch. B.sc Arch Tech		
ARCHITECTURE & AGRICULTURAL DESIGN SERVICES				
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PROJECT: Proposed building for Nora Hurley at Banshy, Youghal, Co. Cork, P36XF84				
DRAWING TITLE: Proposed Site Layout				
DRAWN BY	DATE	SCALE	DWG NO.	JOB NO.
A KELLY	July 2024	1:500	02	80

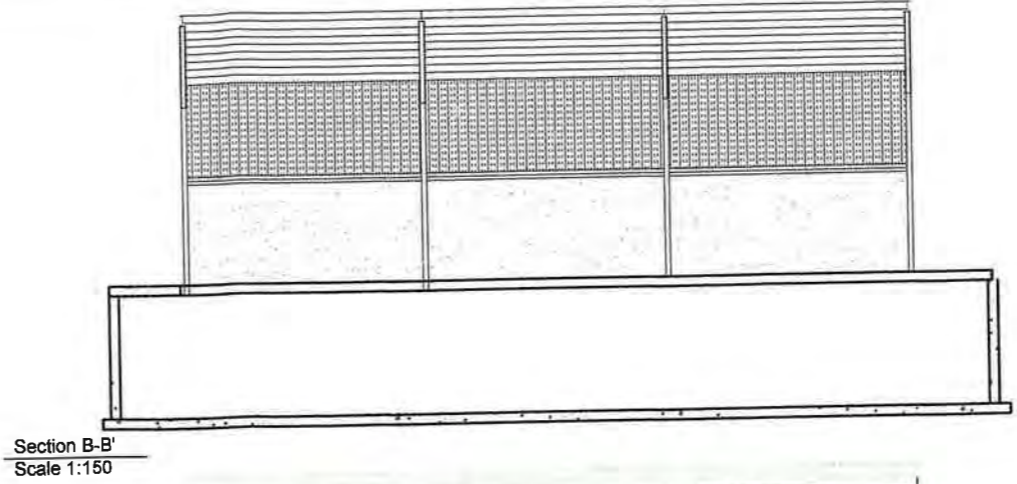


FLOOR PLAN
Scale 1:150

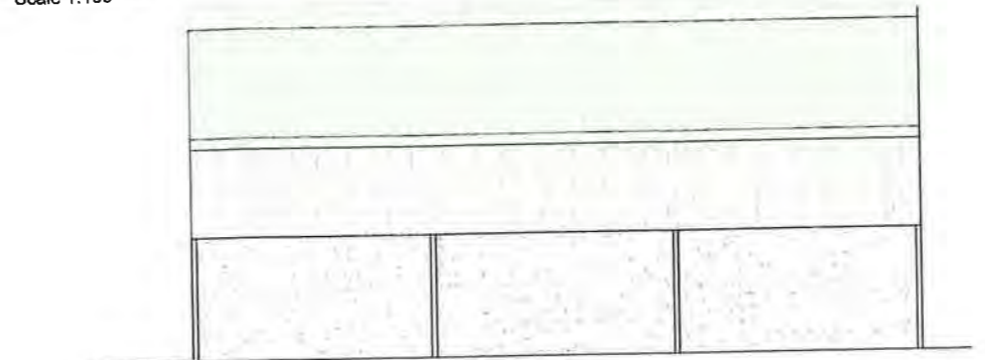


Section A-A'
Scale 1:150

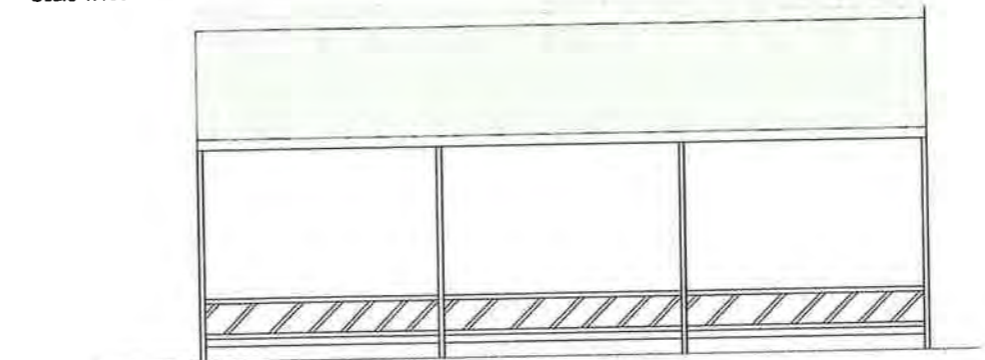
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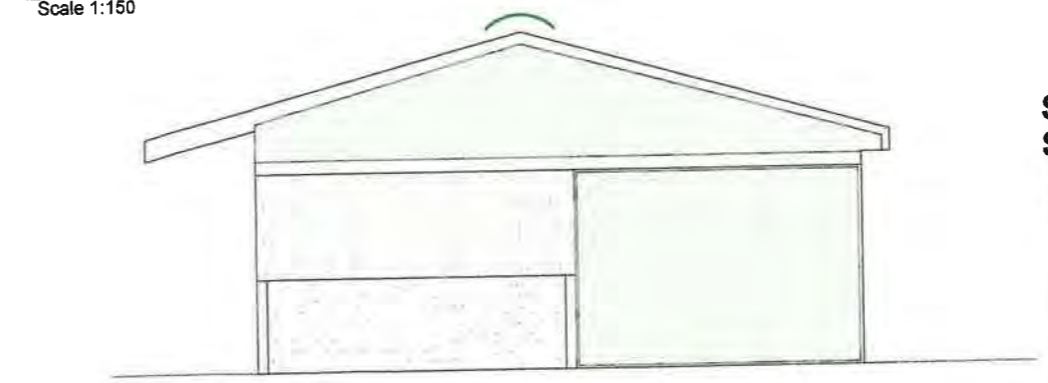
Section B-B'
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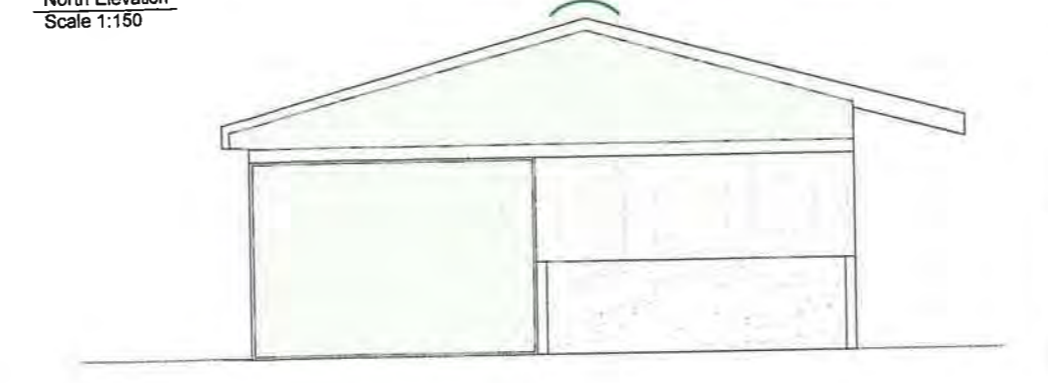
West Elevation
Scale 1:150



East Elevation
Scale 1:150



North Elevation
Scale 1:150



South Elevation
Scale 1:150

Planning Department

12 AUG 2024
Cork County Council
County Hall
Cork

Planning drawing only
NOT CONSTRUCTION DRAWING
Shed area not including canopy : 163m²
Shed area including canopy : 198m²

PLANNING				
AIDAN KELLY		B.Arch. B.sc Arch Tech		
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PROJECT: Proposed building for Nora Hurley at Banshy, Youghal, Co. Cork, P36XF84				
DRAWING TITLE: Plan, section and elevations				
DRAWN BY A KELLY	DATE Aug 2024	SCALE 1:150	DWG NO. 02	JOB NO. 80