

Forward Planning Unit  
Development Plan Review  
Louth County Council  
Town Hall, Crowe Street  
Dundalk A91W20C  
Co. Louth

15<sup>th</sup> December 2020

Dear Sir/Madam,

**DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027**

**RE: SUBMISSION TO DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021 – 2027 ON  
BEHALF OF DUNDALK GRAMMAR SCHOOL, LANDS AT HILL STREET /DUBLIN ROAD  
DUNDALK, CO. LOUTH**

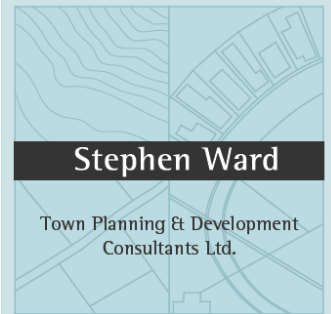
Dundalk Grammar School (DGS) CLG of The Crescent, Dundalk, County Louth has retained Stephen Ward Town Planning and Development Consultants Limited of Jocelyn House, Jocelyn Street, Dundalk, County Louth to make this submission relating to lands in its ownership located to the south of the main school campus and to the west of Hill Street /Dublin Road, Dundalk, Co. Louth. The submission lands include part of the area known as 'Balmer's Bog'.

Please address all correspondence to Stephen Ward Town Planning and Development Consultants Limited, Jocelyn House, Jocelyn Street, Dundalk, County Louth.

To assist Louth County Council in complying with the provisions of the Data Protection Act full details of our submission on behalf of Dundalk Grammar School are attached.

Yours Faithfully

**Stephen Ward**



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## **1.0 INTRODUCTION**

1.1 The submission lands extend to c. 4.1 hectares and are identified edged yellow on the site location map overleaf. The lands are immediately west of Hill Street /Dublin Road and are currently accessed off Hill Street/Dublin Road. The existing access to the lands is within the 50 kph speed limit zone. The lands are also well within the built footprint of the town of Dundalk. They are also well connected and accessible to public transport infrastructure being located only c. 500 metres from Dundalk railway station; c. 870m from the Matthew’s Coach Service Main Pick Up/ Drop Off point at the Marshes Shopping Centre and just over 1km from the main bus station in the town centre. Indeed, the eastern boundary of the lands abuts the Dublin Road, the principal bus route serving the Town from the south.

1.2 The submission lands can be drained and safe access and all utility services can be provided.

1.3 Please address all correspondence to Stephen Ward Town Planning and Development Consultants Limited, Jocelyn House, Jocelyn Street, Dundalk, County Louth.

This submission seeks the following –

- (i) The attachment of a Spot Objective to the Dundalk Grammar School Lands at “Hill Street” for the provision of a Sports and Recreational facility of a Regional Scale on the lands.
- (ii) An amendment to the permitted uses under C1 zoning objective affecting the Grammar School lands at “Hill Street” to include the use category ‘Sports Recreation/Sports facility’ as a permissible use.

## **2.0 BACKGROUND TO SUBMISSION**

2.1 Over the years the Grammar School has invested heavily in expanding and improving on-campus sports/leisure and recreational facilities. At present these facilities include a full-size floodlit astro turf pitch; an all-weather hockey pitch; three artificial grass tennis courts; and two no. external basketball courts. There is also a multi-purpose Sports Hall incorporating three no. indoor badminton courts; a basketball court and a fully equipped gym with segregated changing facilities.

2.2 The subject lands at Hill Street / Dublin Road were recently purchased by Dundalk Grammar School CLG as part of its ongoing and future expansion programme for the school. The lands extend to approximately 4.1 hectares and include part of the area known as Balmer’s Bog.

2.3 Since purchasing the subject lands Dundalk Grammar School has also entered into a wayleave agreement with Louth County Council to facilitate the construction of a pipeline across the lands as part of essential flood alleviation works in the area. Our client has been advised by Louth County Council that tenders for construction of this pipeline were advertised on 17<sup>th</sup> November 2020 and that it is anticipated that construction is to commence in April / May 2021. Please refer to enclosed drawing at Appendix A of this submission showing the route of the pipeline through the DGS lands at Hill Street.

2.4 The School is presently preparing a masterplan for the Hill Street lands for the purposes of developing a state of the art sports and recreational facility of regional significance and including a low-impact ecological park stretching into the Balmer's Bog area. ***It is intended that this facility would be used by the school but would also be available for public use.***

2.5 The intention is to develop a first class sporting hub that encourages participation and progression in sport at all levels. It is envisaged the facility will provide a range of high quality sporting facilities and infrastructure of a type not currently available in Dundalk. The range of facilities it is proposed to provide includes –

- A floodlit rugby pitch, of international standard with ball stop nets;
- An 8 lane athletics running track;
- Long and triple jump facilities; javelin, discus and hammer throwing facilities;
- Pole Vault, Shot Put & High Jump Facilities;
- Additional 3 no. floodlit tennis courts;
- 1 No. MUGA synthetic sports pitch;
- Clubhouse with changing facilities;
- Site Perimeter walking; jogging track with age friendly exercise equipment;
- Spectator stands with capacity for c. 5,000 persons; and
- Bicycle/bus and car parking facilities.

2.6 The development of the Sports / Recreation Facility will be self-funded. In order to fund the project, Dundalk Grammar School intends to release 6.23 hectares of lands in its ownership to the south of the 'Carrick Road' for residential development. Essentially these lands comprise greenfield, virgin, town centre lands that are used primarily by the Grammar School itself but are also leased on an ad-hoc basis to the other sports organisations. Under the Draft Plan, it is proposed to zone the 'Carrick Road' lands G1 – Community Facilities and H1 - Open Space. ***DGS is making a separate submission seeking the rezoning of the Carrick Road lands from G1 – Community Facilities and H1 Open Space to A2 New Residential in the Development Plan in order to facilitate the funding of the sports/recreation facility at Hill Street.***

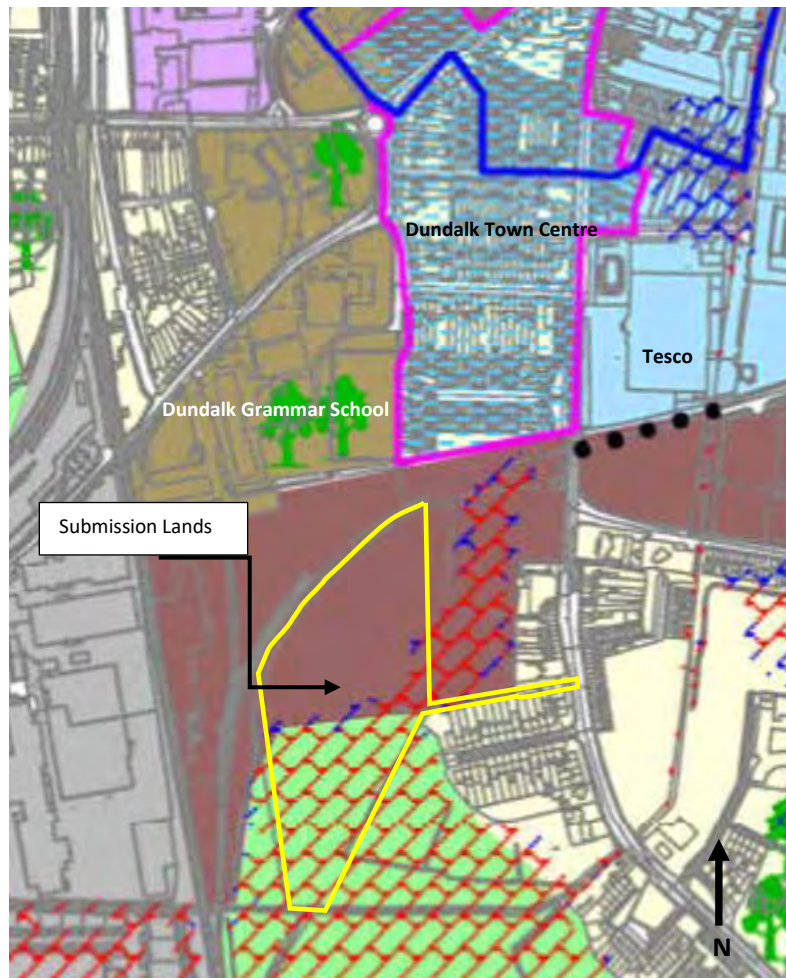
2.7 Given the proposals of the school to develop a sports/recreation facility at Hill Street, the school lands at Carrick Road are now not required for sports / community uses. In addition, the rezoning of the Carrick Road lands for A2 residential uses would facilitate the funding of the sports/recreation facility at Hill Street. Moreover given the lands are fully serviceable, in terms of infrastructure and utilities, it is submitted that having


regard to their location adjacent to existing residential areas; in direct proximity to the town centre and Dundalk Railway Station; that their development for residential uses represents a much more efficient and sustainable use of land. The separate submission being by DGS in respect of the Carrick Road lands elaborates in detail as to why this is the case.

2.8 The release of the Carrick Road lands for residential development would facilitate the development of a state of the art sports/recreation facility for the school at Hill Street approximately 600m to the south-east and so would not undermine or interfere with sports / recreation /open space objections at either national or local level. The state-of-art facility would be used by Dundalk Grammar School but would also be open to the public.

2.9 It would also contribute to the Grammar School maintaining its very important role as an educational institution for Dundalk and the surrounding region.

Figure 1 – Extract from Draft Land Use Zoning Map Showing Approximate Boundaries of Submission Lands



 Submission Lands (c. 4.1 hectares) – Approximate Boundaries

LEGEND					
Land Use Category					
 A1 Existing Residential	 C2 Port Harbour Area	 H1 Open Space	 Tree Preservation Order	 CFRAM Flood Study (OPW)	 Zone of Archaeological Potential
 A2 New Residential	 C3 Commercial and Business	 I1 Tourism and Leisure	 Special Protection Area (NPWS)	 Flood Zone A	 Osi Vector Mapping
 B1 Town or Village Centre	 D1 Regeneration	 J1 Transportation Development Hub	 Benefiting Lands (OPW)	 Flood Zone B	 Proposed National Heritage Area (NPWS)
 B2 Neighbourhood Centre	 E1 General Employment	 J2 Public Infrastructure and Utilities	 Settlement Boundary	 Scenic Views & Prospects	 Future Link Roads
 B3 Retail Park	 E2 Business and Technology	 K1 Agriculture	 Trees & Woodland of Special Amenity Value	 Future Link Roads	 Special Area of Conservation (NPWS)
 B4 District Centre	 F1 Research, Education and Innovation	 L1 Strategic Reserve		 Special Area of Conservation (NPWS)	 Architectural Conservation Area
 B5 Retail, Leisure and Recreation	 G1 Community Facilities	 SO Spot Objective (See Chapter 13)		 Settlement Boundary	
 C1 Mixed Use	 G2 Institutional Lands			 Settlement Boundary	

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2.10 The Hill Street lands are ideally located for the proposed sports/recreational facility as these lands immediately abut and are to the south of the existing school. As such they are the best available lands to allow the school campus to expand. Also, the sports/recreational facilities would be available to the public. This would be a very good thing for Dundalk, particularly having regard to its designation as a Regional Growth Centre and its position on the Dublin – Belfast Economic Corridor. The ‘Hill Street’ proposal would also include a low impact ecological park in the Balmer’s Bog area helping achieve another good use for lands. In all, the proposal would result in high quality active sports and recreation facilities coupled with low impact ecological park at the heart of the town. According to the 2016 Census, the population of the Dundalk Urban area alone (excluding the Blackrock/Haggardstown area and the northern environs of the Town) is in excess of 11,000. ***This is a very substantial population living within a 2.5km radius of the site.***

2.11 At regional planning policy level, the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly Area (2019) identify “healthy place-making” as one of three of key development principles and place a very strong emphasis on providing and planning for quality open space and recreational facilities at development plan stage in the context of current national planning policy and the focus on achieving compact growth and increased densities. In planning for open space / recreation facilities the RSES set out key three guiding principles to be followed by local authorities. One of these guiding principles specifically encourages the co-location of services between sports providers, including schools, in order to facilitate a sufficient supply of high quality sports and recreation facilities (9.4:200). At regional planning policy the role and potential of schools in the delivery of these facilities is explicitly acknowledged. Having regard to the provisions of the RSES, it is entirely appropriate for the Development Plan to acknowledge the potential of Dundalk Grammar School lands at Hill Street to accommodate a very significant piece of sports and recreation infrastructure of a type not currently available in Dundalk.

2.12 Moreover, it is a specific regional policy objective (RPO 9.17) to support local authorities in the development of regional scale Open Space and Recreational facilities particularly those close to large or growing population centres in the Region. ***As it is stands, the Draft Plan is silent on the provision of a regionally significant sports/recreation. This, we submit, is a significant and material omission in the sports and recreational policy of the Draft Plan, having regard to Dundalk’s designation as a Regional Growth Centre.***

*RPO 9.17 – “To support local authorities in the development of regional scale Open Space and Recreational facilities particularly those close to large or growing population centres in the Region”.*

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### **3.0 NATIONAL AND REGIONAL POLICY ON SPORT, RECREATION AND PHYSICAL ACTIVITY**

3.1. The importance of sport and physical activity and the availability of accessible, high quality sports/recreational facilities is prioritised at national planning level. Project Ireland 2020, the Government's National Planning Framework (NPF) seeks to promote a better quality of life for all through a range of National Policy Objectives (NPO) but specifically NPO 26 and NPO 27. The NPF calls for a "whole-system approach" to address the many factors that impact on human health and well-being and identifies land use planning as a key part of achieving this objective in recognition of the societal benefits that a more active, sporting population can bring. Section 6.2 of the National Planning Framework, titled "Healthy Communities" is dedicated to the achievement of this objective and highlights that there is a direct correlation between spatial planning and human health. The NPF explicitly acknowledges that spatial planning can have a bearing on rates of heart disease, respiratory disease, mental health, obesity and injuries, noting,

*"Communities that are designed in a way that supports physical activity, e.g. generously sizes footpaths, safe cycle lanes, safe attractive stairways and accessible recreation areas, all encourage residents to make healthy choices and live healthier lives."* (6.2:82)(Emphasis added)

3.2 In 2016 the Government published the very first 'National Physical Activity Plan for Ireland'. Broadly, the Plan seeks to encourage all citizens become more physically active in recognition of the proven health benefits exercise, movement and a non-sedentary lifestyle can bring. Schools have a key role to play in the implementation of this Plan, with the Plan acknowledging the need to develop more community-wide physical activity programmes and partnerships focused on children and families and to provide education and physical activity opportunities directly to them in schools. It is a specific policy objective of the RSES (RPO 9.16) that local authorities shall support the objectives of public health policy, including the 'National Physical Activity Plan', through integrating such policies, where appropriate and at the applicable scale, with planning policies contained in development plans.

3.3 The DGS proposal, comprising the expansion of an existing school to include state of the art sporting facilities and passive low impact ecological park, and by virtue of its central and accessible location merits specific recognition in the emerging Development Plan as sought by this submission. It is submitted that to do so would be in keeping with RPO 9.16.

3.4 In addition to health benefits, the NPF also draws attention to the economic value of creating healthier places through the provision of and by planning for high quality and accessible sports / recreation / walking / cycling infrastructure. In this regard, the NPF states, *"Healthy places in turn create economic value by appealing to a skilled workforce and attracting innovative companies"* (6.2:82). As a Regional Development Centre and key location along the Dublin – Belfast Economic Corridor, being able to attract and maintain employment is a high level priority for Dundalk. It is therefore absolutely imperative that in addition to planning for other key supporting employment infrastructure such as housing, services and transport, the forthcoming Development Plan must also ensure, through the land use zoning system and by identifying suitable sites, that high quality sports / recreational facilities such as those being planned and self-funded by the Dundalk Grammar School can

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be nurtured and developed. We would again re-iterate that the Dundalk Grammar School facility would be open to the public.

3.5 The Hill Street lands provide the optimum location for the development of such a facility at the heart of the town centre area; in proximity to public transport; and accessible to major employment areas specifically; the Xerox Technology Park; Finnabair Industrial Park and the new Wuxi Bio-Pharma Plant. In the interests of attracting employment to the Town and consistent with NPO 44 which specifically seeks to promote and enhance the “international visibility” of the Dublin – Belfast Economic Corridor, and in particular the core Drogheda-Dundalk-Newry network, Dundalk Grammar School seeks specific recognition of the provision of a Sports and Recreational facility of a Regional Scale through the inclusion of a spot objective and by expanding the current range of permissible uses under the C1 zoning objective to include sports/recreation facility of regional scale. The attachment of this spot objective to the lands and amendment of the current permitted uses to include “Sports/Recreation” facilities would be fully consistent NPO 44 and in keeping with Dundalk’s role as Regional Development Centre where it is expected to grow and develop its economy at an accelerated rate compared to other settlements.

3.6 It would also be entirely consistent with Regional Policy Objective RPO 9.17 which explicitly seeks the development of open space and recreational facilities of a regional scale in growth centres, such as that being proposed by Dundalk Grammar School on the Hill Street /Dublin Road site. The proposal would assist in the direct implementation of RPO 9.17.

3.7 The <sup>1</sup>National Sports Policy also acknowledges the contribution that sport can make to the economy. Referring to a 2010 Indecon Report, the NSP highlights that national household expenditure on sport and sporting-related goods and services equated to 2 per cent of the value of the consumer spending; sport related spending contributed 1.4 per cent of economy wide Gross Domestic Product (GDP); and sport and sport related activities supported over 38,000 full-time equivalent jobs. This equates to over 2 per cent of the overall level of employment nationwide.

The NSP also acknowledges the economic contribution of sport is likely to increase in coming years.

3.8 Further to this, the 2015 Government Policy Statement – ‘People, Place and Policy – Growing Tourism to 2025’ acknowledges that the contribution of sport and sporting events to the tourism sector is highly significant. The development of high quality tourism infrastructure, such as a regional sports/leisure and recreational facility, capable of attracting critical mass will ensure these fiscal benefits to the tourism sector continue.

3.9 Improving and enhancing the provision of sporting facilities and access and participation in sport forms a key plank of current Government policy at all levels. Having regard to Dundalk’s designation as a Regional Growth Centre and projected population target of 50,000 by 2031, there is a need to ensure adequate sporting

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<sup>1</sup> National Sports Policy 2018-2017, Chapter 1, pg. 13

and recreational facilities are provided in tandem with housing and employment development and for the general health and well-being of its inhabitants.

3.10 The subject site represents the optimum location for the development of a Sports/Leisure and Recreational Facility of a regional scale, having regard to its highly accessible and sustainable location in close proximity to Dundalk Town Centre, a mainline railway station and along one of the Town's principal bus corridors.

3.11 The provision of such a facility would also be consistent with the regional policy objectives RPO 9.14 and RPO 9.20. RPO 9.19 encourages the support of the planned provision of easily accessible social, community, cultural and recreational facilities, whilst RPO 9.15 acknowledges and reiterates one of the objectives of the *National Sports Policy (NSP) 2018-2027*, which is to increase and encourage more participation in physical activity and sports at grass roots level.

#### **4.0 THE DRAFT PLAN AND OUTDOOR RECREATION**

4.1 Section 4.7 of Chapter 4 of the Draft Plan sets out policies and objectives for outdoor recreation over the period of the Plan from 2021 – 2017. Mirroring national policy including National Policy Objectives NPO 26 and NPO 27, the introduction to this section of the Plan notes *“Outdoor recreational spaces and facilities are essential for the health and wellbeing of people living in County Louth”*. The development of the Hill Street lands in the manner proposed would result in a significant net increase in the availability of sports/recreation and passive leisure facilities for Dundalk and the wider region.

4.2 Sections 4.7.1 (Open Space and Parks), 4.7.2 (Play facilities for Children) and 4.7.3 (Sports Facilities) all promote such facilities and the attachment of a spot objective to and expansion of permissible of the submission lands would facilitate their provision as part of the Hill Street sports/recreation/leisure development by Dundalk Grammar School. For example, Draft Policy SC16 states – *“To support the provision of playgrounds in a variety of land use zoning categories where appropriate”*, Policy CS18 states – *“To maximise the range of public play opportunities available to all children”* whilst Policy Objective SC20 states with respect to sports facilities – *“To support and facilitate the provision, improvement and expansion of sports and recreational facilities, in particular through land use zoning, where appropriate”*. These objectives also very much align with those set out in the National Planning Framework and current national policy on public health.

#### **5.0 THE DRAFT PLAN AND EDUCATION**

5.1 Draft Plan policy for education is set out at Section 4.10 of the Development Plan. This submission is directly linked to the continued success and future expansion and growth of Dundalk Grammar School. The school is an important educational component in the educational structure of Dundalk. The School must always look forward to grow and expand the range of facilities available to pupils. It is in that light that the school has acquired lands to the south of its existing campus. It is intended to develop these lands as a major educational and recreational sports complex for the school that will also be available to the public. In addition to the sports / recreational complex it is also intended to develop a low-impact ecological park at Balmer's Bog.

5.2 The attachment of a spot objective to the submission lands for the purposes sought and expansion of uses would also fully comply with the introductory statement to Section 4.10 of the Plan that states – *“Education is a critical driver of economic success and social progress. The provision of quality education and training is central to skills, knowledge and innovation based economy that will underpin future prosperity”*. The sports / recreation / leisure campus would also maintain the key position of the school into the future as a major educational provider for Dundalk and the north-east region –

*“SC25 – To ensure that adequate lands are zoned and reserved to cater for the establishment, improvement and expansion of all educational facilities in the County”*.

*“SC26 – To reserve sites for educational use in those areas identified for significant population increase or where there is likely demographic demand for further school places and to ensure the development of educational facilities to meet the educational requirements of citizens of County Louth”*.

5.3 The attachment of a spot objective to the lands to provide for a sport / recreation facility of regional scale and expansion of permissible uses to include sports / recreational uses would copper-fasten Dundalk Grammar School as a key educational provider in Dundalk and the wider region which would be fully in keeping with the community and education policies and objectives as set out at Chapter 4 of the Draft Development Plan.

## **6.0 SUMMARY AND CONCLUSION**

6.1 Improving and enhancing the provision of sporting facilities and access and participation in sport forms a key plank of current Government policy at all levels. Having regard to Dundalk’s designation as a Regional Growth Centre, position on the Dublin – Belfast Economic Corridor and projected population target of 50,000 by 2031, there is a need to ensure adequate sporting and recreational facilities are provided not only in tandem with housing and employment development but also to ensure the health and well-being of the population.

6.2 Having regard to the Town’s designation as a Regional Growth Centre, the sporting and recreational policy as set out in the Draft Development Plan contains a significant lacuna. Regional Policy Objective (RPO 9.17) strongly promotes the development of regional scale Open Space and Recreational facilities particularly those close to large or growing population centres in the Region. As it stands, the Draft Plan is completely silent on the provision of a regionally significant sports/recreation facility.

6.3 The Dundalk Grammar School proposal represents a unique and very tangible opportunity to provide a state of the art sporting facility that encourages participation and progression in sport at all levels. The facility would provide a range of high quality sporting facilities and infrastructure of a type not currently available in Dundalk. In addition to the sports / recreational complex it is also intended to develop a low-impact ecological park at Balmer’s Bog. This will only be possible however if land use planning and zoning policy in the emerging Plan take account of national and regional policy on sports and recreation and specifically the need to develop regionally

significant facilities in centres of growth and expansion that are earmarked to accommodate higher levels of population and employment, such as Dundalk.

6.4 The subject site represents the optimum location for the development of a sports / recreational facility of a regional scale, having regard to its location within the Regional Growth Town of Dundalk, its accessible and sustainable location in close proximity to a mainline railway station, other public transport infrastructure and Dundalk Town Centre.

Yours faithfully,

**Stephen Ward**

**APPENDIX A**

TOBIN DRAWING REF. NO. 10232-3011 – SHOWING “DUNDALK GRAMMAR SCHOOL WAYLEAVE”  
ACROSS SUBMISSION LANDS AT HILL STREET



CLIENT:	LOUTH COUNTY COUNCIL		
PROJECT:	FLOOD ALLEVIATION WORKS AT TOWNPARKS, DUNDALK		
WAYLEAVE ACQUISITION DRG. No.	6011		
WAYLEAVE TO BE ACQUIRED FROM:	DUNDALK GRAMMER SCHOOL		
TOWNLAND:	TOWNPARKS		
OS MAP REFERENCE(S)	1632		
PERMANENT WAYLEAVE (Shown Coloured Yellow)	Width :	10 Metres	
	Length :	240 Metres	
TEMPORARY WAYLEAVE NUMBER 1 (Shown Coloured Green)	Width :	20 Metres	
	Length :	230 Metres	
RIGHT OF WAY (Shown Coloured Blue)	Width :	7.0 Metres Average	
	Length :	130 Metres	
DETAILS OF PIPE:	Number of Pipes:	1Nr. Pipe	
	Pipe Diameters(s):	1350mmØ	
	Depth to Pipe(s):	2500mm to 2600mm	
	Service Type:	Surface Water Pipeline	
	Pipe Material:	Concrete	
	Number of Manholes:	2 No. Manhole on 1350mmØ Pipe	
Signed by the said			
In the presence of			
Date			

EXTRACT FROM O.S. SHEET 1632

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- NOTES**
- FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING
  - ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE
  - ENGINEER TO BE INFORMED BY THE CONTRACTOR OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES
  - ALL LEVELS SHOWN RELATE TO ORDNANCE SURVEY DATUM AT MALIN HEAD

Rev.	Date	Description	By	Chkd.
C	DEC'19	WAYLEAVE & OWNER REVISED	P.C.	P.C.
B	SEPT'17	Electrical Ducts Removed	T.O.B.	P.C.
A	AUG'17	DRAFT ISSUE	T.O.B.	P.C.

Client <b>LOUTH COUNTY COUNCIL</b>	Prepared by: T.O.B.
Project <b>FLOOD ALLEVIATION WORKS AT TOWNPARKS, DUNDALK</b>	Checked: P.C.
Title <b>DUNDALK GRAMMER SCHOOL WAYLEAVE DRAWING</b>	Date: AUG'17
	PROJECT DIRECTOR : P.C.
	Scale: 1:1500 @ A3

	Consulting, Civil and Structural Engineers, Fairgreen House, Fairgreen Road, Galway, Ireland. tel: +353-(0)91-565211 fax: +353-(0)91-565398 e-mail: info@tobin.ie www.tobin.ie
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Drawing No. <b>10232-6011</b>	Revision <b>C</b>