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7 August 2016

Dear Sir / Madam

Forensic Pathology and Coroner's Court Reference SSD 16_7545

I am writing to object **against** the abovementioned development proposal for the proposed Forensic Pathology and Coroner's Court at Lidcombe 'the Facility'.

While the Facility is sited at Lots 1, 2 and 3 DP 850697, Weeroona Rd, Lidcombe, many of the concerns associated with the Facility occur because the Facility **has its main public access and public car park access from the residential estate of Botanica (in Main Avenue), and not from Weeroona Rd.**

Further, the Environmental Impact Statement (EIS) documents for the Facility contains several material **errors of fact and omissions**. I therefore submit the following concerns for your attention:

Document / para	Error / Omissions /Concerns
<p>1. Statement of Heritage Impact</p> <p>This document fails to recognize the heritage significance of the <u>Senior and Junior Medical Officers residences</u>, which are proposed to be demolished</p>	<p>The Facility is on the site of the old Lidcombe Hospital and boy's reformatory, a site dating back to the 1800's and of great heritage significance.</p> <p>The site contains senior and junior medical officer's cottages, and the significance of these cottages is noted many times in the 2002 Conservation plan for the adjacent development, Botanica, which is also on the site of the old Lidcombe hospital http://www.auburn.nsw.gov.au/Develop/PlanPolicies/Pages/Former-Lidcombe-Hospital-site.aspx. (E.g. para 1.7, 2.8.5 para 3.6.1 and para 3.9 as well as the maps).</p> <p>Buildings of similar era and architecture were required to be conserved by the developer when Botanica was built (e.g. wards, nurse's quarters, and medical superintendent's residence).</p> <p>It is a major oversight that the Statement of Heritage minimizes the heritage significance of these cottages</p> <p>The State Government appears to have 'double standards' requiring private developers to conserve buildings but allowing their own departments to demolish equivalent buildings</p> <p><i>This risk to loss of heritage will be mitigated if the entrance to the Facility is moved to Weeroona Road or Joseph St so these buildings can be conserved</i></p>

Document / para	Error / Omissions /Concerns
<p>2. Statement of Heritage Impact</p> <p>This document fails to recognize the heritage significance of <u>Palm circuit</u> which is proposed to be demolished for the public car park</p>	<p>The Southern part of Palm circuit was also noted when Botanica was developed as being of high historical significance http://www.auburn.nsw.gov.au/Develop/PlanPolicies/Pages/Former-Lidcombe-Hospital-site.aspx. (4.6.4). <u>The Northern part of Palm circuit, which falls within Botanica Estate, was required to be conserved when Botanica was built.</u></p> <p>If this goes ahead, again the State Government will have 'double standards' requiring private developers to conserve a heritage significant road (Palm Circuit – Northern side) but allowing their own departments to demolish the exact same heritage significant road (Palm Circuit – Southern side).</p> <p><i>This risk will be mitigated if the entrance to the Facility is moved to Weeroona Road or Joseph St</i></p>
<p>3. Statement of Heritage Impact</p> <p>The comments therein around 'visual separation' as a justification for <u>not</u> conserving heritage items is not appropriate e.g. page 15 last para also para 17</p>	<p>The document uses 'visual separation' as a reason to NOT conserve heritage items</p> <p>This misses the point that the wide dispersion of buildings in the old hospital is indicative of the early pattern of development. So the fact that they are visually separated is more of a reason to conserve, not less.</p>
<p>4. Statement of Heritage Impact</p> <p>Para 4.3 Under the 6.4.1 requirement to 'conserve the significant road layout, alignments and road widths within the proposed heritage precinct including Main Avenue.</p>	<p>The comments therein are misleading by omission and fail to explicitly point out that Main Avenue will NOT be conserved – it will be destroyed by a car park exit being constructed through it.</p>

5. Statement of Heritage Impact


Para 4.3 Under the 6.4.4 requirement to conserve the vista up and down Main Avenue

The comments therein are misleading in that construction of a vehicular exit in Main Avenue will clearly not maintain its vista. Botanica, Lidcombe, is built on the site of the old Lidcombe hospital which is a heritage significant area. In 2002 GML prepared a conservation plan for the old Lidcombe hospital which can be found at <http://www.auburn.nsw.gov.au/Develop/PlanPolicies/Pages/Former-Lidcombe-Hospital-site.aspx>. The document refers to the historic entrance road to the hospital, known as "Main Avenue" as having **exceptional heritage significance**. As such, it was preserved intact when Botanica was developed including grass areas, plantations, verges and brickwork to preserve its overall vista and streetscape.

NSW Dept. Environment and Heritage website also lists Main Avenue on the heritage register **in its entirety** including grassed area, brickwork and verges – see <http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=5049732>.

Further, see Auburn council DCP – link at <http://www.auburn.nsw.gov.au/Develop/PlanPolicies/DCP1/Former%20Lidcombe%20Hospital%20Site.pdf> also notes the heritage significance of the area. For example, page 12 *"The Main Avenue heritage landscape element is restored to replace missing elements such as plantings of pines and palms. Any new development near heritage landscape elements does not adversely affect the significance or character of those elements."*

Here is a photo of Main Avenue as it is today.

Document / para	Error / Omissions /Concerns
	 <p data-bbox="615 856 1403 1066">It is astounding to suggest that a new car park exit on the right hand side, where the historic brickwork is, will not impact the vista. It DOES impact the vista, street scape and character. The heritage of Main Avenue MUST be respected and there must NOT be a new car park exit in it.</p> <p data-bbox="615 1108 1419 1178"><i>This risk will be mitigated if the entrance to the Facility is moved to Weeroona Road or Joseph St</i></p>
<p data-bbox="196 1188 558 1255">6. Statement of Heritage Impact</p> <p data-bbox="196 1262 565 1472">Para 4.4 – the comment “Public Access is to be from Main Avenue where parking is provided and there is access to public transport”</p>	<p data-bbox="615 1188 1386 1329">This is incorrect. There is no public transport on Main Avenue. The main bus service to the area is the m92, which goes via Weeroona Rd. Even the less frequent 925 does not stop on Main Avenue</p> <p data-bbox="615 1371 1419 1440"><i>This will be addressed if the entrance to the Facility is moved to Weeroona Road</i></p>
<p data-bbox="196 1482 558 1549">7. Statement of Heritage Impact</p> <p data-bbox="196 1556 552 1696">Para 4.5 – “removal of some early brick kerbing fabric is considered acceptable”</p>	<p data-bbox="615 1482 1419 1587">The removal of brickwork which dates back to 1800’s to build a car park exit, when there are alternatives available, is absolutely unacceptable</p> <p data-bbox="615 1629 1419 1730"><i>This risk to loss of heritage will be mitigated if the entrance to the Facility is moved to Weeroona Road or Joseph St</i></p>

Document / para	Error / Omissions /Concerns
<p>8. Statement of Heritage Impact I note there has been no consultation with local heritage groups</p>	<p>It is prudent and appropriate to consult with Lidcombe Heritage Group on this significant proposal. I note their contact details are publically available on the Internet</p>
<p>9. Environmental Impact statement document 4.7.2 Community notification and information sessions The following statement therein is incorrect <i>“However a few attendees made the comment the building and/or vehicle access should be moved to be positioned elsewhere on the site and away from Main Avenue. “</i></p>	<p>This is not correct. I attended the session on 2 July 2016 and the inappropriateness of having the public entrance and vehicular entrance and exit from Main Avenue in Botanica dominated the conversation and was voiced by many. To infer otherwise is not correct</p> <p><i>This risk will be mitigated if the entrance to the Facility is moved to Weeroona Road or Joseph St</i></p>
<p>10. Environmental Impact statement document Missing Masterplan</p>	<p>At the community consultation meeting on 2 July 2016, the project team explained that the proposed Facility is one of 3 new developments on the site bounded by Weeroona Rd, Joseph St and Main Avenue. Further, the EIS documents also refer to potential for expansion.</p> <p>There needs to be transparency and visibility over the masterplan for the site so a holistic view can be taken in assessing the impact of this development.</p>

11. Appendix D1 Traffic and parking Assessment

While the proposed new car park exit is immediately opposite Betty Cuthbert Drive (refer to architectural drawings in Attachment 2 of Appendix D1), the document does not include any traffic studies for Betty Cuthbert Drive.

This is a major and significant omission.


This is a serious omission. None of the studies in Appendix D1 include Betty Cuthbert Drive. Yet Betty Cuthbert Drive is immediately opposite the proposed car park exit.

Betty Cuthbert Drive is a road clearly not set up for commercial traffic. It is naïve to think people will follow signage – they will follow their navigators.

Betty Cuthbert Drive has 2 sudden 'kinks' in it, and was designed that way to preserve heritage listed trees that date back to the 1800's. Visitors and even residents to the area that are unfamiliar with these kinks in the road have been known to mis-negotiate them and end up on the kerb. This road absolutely cannot cater for additional traffic of visitors to the Facility that is a 24 hour facility. The curvature of the road and risks of having this as a thoroughfare for public traffic for the Facility was explained to the project team on 2 July 2016.

Please be aware that Thursday 7 April, 2016, a child was killed in Auburn when a car mounted the footpath on a road that had a similar sudden kink in it. **Should this happen on Betty Cuthbert Drive as a result of a car travelling to or from the Facility via Betty Cuthbert Drive, because the car park access is via Main Avenue, this correspondence is on public record and the project team have been informed of their duty of care.**

Below are photos of the 2 kinks in Betty Cuthbert Drive that are mis-negotiated by visitors unfamiliar with them

Document / para	Error / Omissions /Concerns
	 <p data-bbox="613 957 1422 1031"><i>This risk will be mitigated if the entrance to the Facility is moved to Weeroona Road or Joseph St</i></p>

12. Appendix D1 Traffic and parking Assessment

The diagrams with assumed traffic flow are incorrect and inconsistent with the architectural drawings.

The diagrams show traffic exiting and going through Botanica Drive to head northbound. Figure 8 which maps this assumption shows the car park exit incorrectly positioned and not opposite Betty Cuthbert Drive. Whereas the architectural drawings and figure 9 show the car park exit opposite Betty Cuthbert Drive.

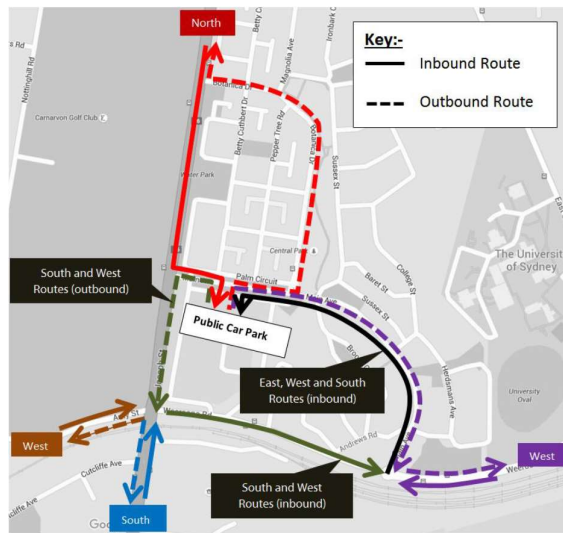
This is a significant discrepancy

If the car park exit is directly opposite Betty Cuthbert drive, outbound cars will go Betty Cuthbert drive to head North


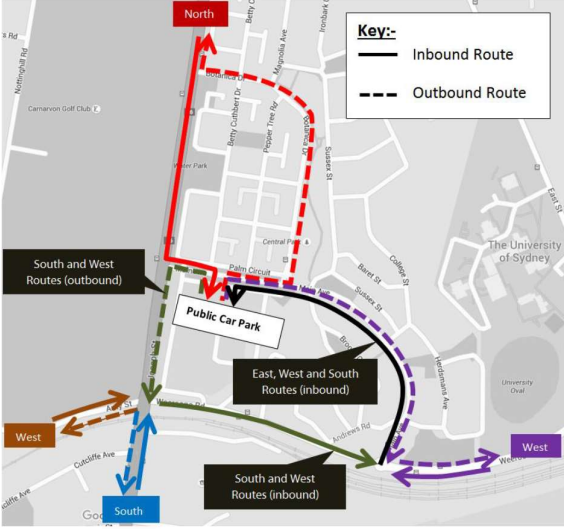
Further, Betty Cuthbert Drive is not set up for commercial traffic as explained above. It is a narrow, local, curved road.

It is also naïve to think people will follow signage – they will follow their navigators

Below is figure 8 from the Parking and Traffic assessment which does not correctly show the positioning of Betty Cuthbert drive opposite the proposed car park exit, and assumes cars will use Botanica Drive. This is **not** necessarily correct.



Whereas below is an extract from the Parking and Traffic Assessment figure 9 which shows the proposed car park exit directly opposite Betty Cuthbert Drive. This is also reflected in the architectural drawings in Attachment 2 of the document.


Document / para	Error / Omissions /Concerns
	 <p data-bbox="613 903 1425 976"><i>This risk will be mitigated if the entrance to the Facility is moved to Weeroona Road or Joseph St</i></p>
<p data-bbox="194 1060 527 1165">13. Appendix D1 Traffic and parking Assessment</p> <p data-bbox="194 1165 576 1522">The traffic modelling is incorrect as it assumes that inbound cars travelling from the North on Joseph St will access the Facility from Weeroona Road. This is not correct. They will also access it from Botanica Drive</p>	<p data-bbox="613 1060 1425 1197">Cars travelling from the North from Joseph St will turn into Botanica drive, and then drive through Botanica to access the public entrance to the Facility. This has been omitted from traffic modelling.</p>  <p data-bbox="613 1806 1425 1879"><i>This risk will be mitigated if the entrance to the Facility is moved to Weeroona Road or Joseph St</i></p>

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<p>14. Appendix D1 Traffic and parking Assessment</p>	<p>It is also inappropriate for traffic to be forced to go via Botanica as it places the community at risk</p> <p>Access from Main Avenue to Joseph St is "left hand turn only" – southbound only – so cars exiting the proposed facility and wishing to travel northbound will be unable to, and will have to go through Botanica estate. Many visitors to the Facility will already be highly emotional, so having disoriented and emotional drivers weaving through a residential family-oriented estate, 24 hours a day, is highly inappropriate.</p> <p>There is also a risk that for some high profile cases, visitors could weave and wind through Botanica to avoid waiting media, again placing residents at unnecessary risks if the main entrance to the facility is in a residential area</p> <p><i>This risk will be mitigated if the entrance to the Facility is moved to Weeroona Road or Joseph St</i></p>

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<p>15. Appendix D1 Traffic and parking Assessment</p> <p>The presence of Ferguson lodge, within Botanica, is not discussed</p>	<p>The current traffic and parking arrangements, with the main entrance on Main Avenue endangers the residents of Ferguson Lodge who have a spinal cord injury and are in wheelchairs.</p> <p>When Ferguson lodge residents cross Botanica Drive, there will now be additional traffic due to the facility.</p> <p>When Ferguson lodge residents go southbound on Joseph St to Amy St, they will have to cross Main Avenue, on Joseph St, where the proposed access is to the Facility</p> <p>Whilst this path may in theory, be 'accessible' there will now be many more cars due to the new car park entrance and exit in Main Avenue. Further the drivers of the additional cars and traffic will be in a highly emotional state of mind (can you imagine going to identify the body of a loved one, or attend a court hearing around their death). The last thing they will look out for is someone is a wheelchair</p> <p><i>This risk will be mitigated if the entrance to the Facility is moved to Weeroona Road</i></p>
<p>16. Appendix D1 Traffic and parking Assessment -</p> <p>7.5 Pedestrian and Cyclist Management</p> <p>The document states "<i>It is anticipated the pedestrian activity in public areas surrounding the site will be low due to the isolated nature of the surrounding properties and no formalised pedestrian facilities</i>"</p> <p>This is not correct</p>	<p>There is no footpath on Main Avenue because it is heritage listed. However there is significant pedestrian traffic in the area as Botanica is an estate of around 700 houses, so say 2000-3000 residents. There is a huge risk to pedestrians, many who are families with children attending the central park on Botanica Drive and Water park on Betty Cuthbert drive, if the main entrance to the court is on Main Avenue.</p> <p><i>This risk will be mitigated if the entrance to the Facility is moved to Weeroona Road</i></p>

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<p>17. Appendix D1 Traffic and Parking assessment</p>	<p>The traffic modelling calculations are based on 2 courts however, it is stated in the EIS that there is potential to expand to 4 courts. The traffic from these additional courts are not included in the traffic modelling calculations.</p> <p>At the meeting on 2 July 2016, we were also advised that the proposed Facility is one of 3 new developments on the site bounded by Joseph St and Weeroona Rd. There is no transparency around the other 2 developments and the traffic and parking impact of those future traffic flows.</p>
<p>18. Appendix D1 Traffic and parking Assessment Danger to children crossing the road</p>	<p>The 925 Bus stop, which includes the school busses, stop at 2 bus stops on Botanica Drive, requiring children to cross the road. Children also cross Botanica's streets to go to Central Park and playground. The additional traffic especially from people unfamiliar with the estate will put our children at risk.</p>
<p>19. Appendix D1 Traffic and parking Assessment</p>	<p>The proposed main access via Main Avenue in Botanica will also create parking issues on our local roads which are not designed to accommodate such volumes of commercial visitors.</p> <p><i>This will be mitigated if the entrance to the Facility is moved to Weeroona Road or Joseph St</i></p>

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<p>20. Appendix D1 Traffic and parking Assessment</p> <p>Developments Proposed in the Vicinity</p> <p>The document states <i>"there are no planned or approved developments within proximity to this development that would result in increase in traffic using the Joseph Street/Weeroona Road intersection.</i></p> <p>This is not correct</p>	<p>Firstly, there are currently apartments being built in Main Avenue Botanica, as well as residences currently being built in Copeland St, Andrews Rd, and Brooke's circuit, There is even a sales office.</p> <p>Further, the project consultants themselves mentioned at the community consultation meeting on 2 July 2016 that there are 2 other proposed additional developments to be built adjacent to the Facility.</p> <p>As a result, the traffic, both vehicle and pedestrian traffic, from these new residences and developments were not taken into account in the traffic studies so the studies are incorrect.</p>
<p>21. Appendix D1 Traffic and parking Assessment Conclusion</p>	<p>The conclusion to the Traffic and Parking Assessment states <i>"In summary, Parking and Traffic Consultants assisted the design team to develop eight (8) options during the concept design phase in which option 1 was identified as the preferred option and has been used as part of the Schematic Design Phase for assessment."</i></p> <p>There needs to be transparency around the remaining seven (7) options</p>

Document / para	Error / Omissions /Concerns
<p>22. Appendix D1 Traffic and parking Assessment - Developments Proposed in the Vicinity</p> <p><i>Public consultation has been undertaken with the landowners of Botanica Estate. Botanica Estate is located to the north of Main Avenue adjacent to the proposed public access into the FPCC. The owners have indicated that a Master Plan has been prepared to expand the site for additional residential lots. At the time of preparing this report, details of the Master Plan and the proposed lot yields were not available."</i></p> <p>This is not correct</p>	<p>I was at the meeting on 2 July 2016 when we mentioned the masterplan for Botanica to the project team. Respectfully it is not correct to say <i>"At the time of preparing this report, details of the Master Plan and the proposed lot yields were not available."</i> This information is freely available through Auburn Council, the developer, a site visit, or even a visit to the sales office.</p> <p>It should <u>not</u> be up to residents of Botanica to tell the project team about current developments in the area.</p> <p>Finally, below is a photo as an example of homes that are currently being built on Main Avenue. As mentioned above, new residences currently being built in Main Avenue, Copeland St, Andrews Rd, and Brookes circuit. A site visit would have shown these. These have all been omitted from traffic studies.</p> 

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<p>23. General</p> <p>The artists drawing omits to recognise that Main Avenue is the main entrance to the residential community of Botanica</p>	<p>Below is the drawing of the proposed court taken from the EIS documents. What the artist did not record is that the stone wall currently states the name of the Estate "Botanica"</p>  <p>This is a photo of the same site as it currently stands.</p>  <p>It is deeply offensive that the court will strip away the identity of Botanica</p> <p><i>This will be mitigated if the entrance to the Facility is moved to Weeroona Road or Joseph St</i></p>

Document / para	Error / Omissions /Concerns
<p>24. General The facility is a 24 hour operation</p>	<p>It is highly inappropriate to have the public entrance to a busy, high profile, <u>24 hour commercial operation</u> in a peaceful residential area.</p> <p><i>This will be mitigated if the entrance to the Facility is moved to Weeroona Road or Joseph St</i></p>
<p>25. General Security Having the main public entrance from Main Avenue Botanica puts residents at risk</p>	<p>At the community consultation meeting on 2 July 2016, project representatives explained the reason why the staff and public entrances were separate was because they didn't want emotional members of the public 'spilling out' into the staff area and endangering staff.</p> <p>Yet these same members of the public will be 'spilling out' and endangering residents of Botanica! This clearly places residents of Botanica at risk. The reckless disregard shown to the safety and amenity of residents of Botanica is astounding.</p> <p><i>This will be mitigated if the entrance to the Facility is moved to Weeroona Road or Joseph St</i></p> <p>Even if the main public entrance to the court is moved to Joseph St or Weeroona Rd, there should also be barriers on Joseph St so visitors to the morgue cannot see the residential estate of Botanica</p>

In conclusion, the development proposal as it stands presents serious concerns, including concerns around:-

- destruction of extremely significant heritage
- traffic flow
- risks to safety
- errors, omissions, incorrect and incomplete assumptions, calculations and modelling

These mainly stem from having the main public entrance to the facility, and the public car park entrance and exit, from within the residential estate of Botanica.

These issues would substantially be resolved if the main entrance to the Facility was NOT from Main Avenue, Botanica.

The conclusion of the Traffic and Parking Assessment states there are eight options – and only 1 has been presented.

The EIS needs to be redrafted with one of these 7 alternate options that does not have the main entrance to the Facility from within Botanica.

An alternative needs to be found, such as having the main public entrance to the Facility on Joseph St or Weeroona rd.

Sincerely

Lucy Doherty