

Community Action for Windsor Bridge
From the environmental impact statement response

"The precedent Argument"

### 4. THE PRECEDENT ARGUMENT

### **Key Issues**

- A significant element in the case being mounted in support for Option One is the purported historical alignment of Bridge/Old Bridge Street and its previous use as access to 'Windsor Bridge'.
- This so-called 'precedent argument' has been widely used in the NSW Parliament, media statements by local politicians and official government correspondence to justify Option One.
- This argument calls upon historical precedent as justification for inserting a major, contemporary concrete structure into a heritage precinct.
- The claimed historical precedent does not exist. Should it exist, it would not justify such vandalism.
- Historical research reveals the inconvenient truth. The RMS, prior to making public statements on the issue, should have undertaken this research.
- There are six classes of evidence to support the argument against the Bridge Street claims: topographic, cartographic, photographic, contemporaneous reports, anecdotal and nomenclature.
- The evidence set out below makes clear the 'precedent argument' should never have been mounted. Its use reflects either incompetence or deliberate dishonesty.

## **Discussion**

Before analysing evidence that reveals the truth about the 'Precedent Argument', the point must be made that whether true or not, 'precedent' was never a valid justification for what is proposed. It is the equivalent of saying "Port Arthur was a penal institution, so this justifies building a super-max gaol on the site of Port Arthur."

The premise that "Bridge Street" at some time provided access to bridge/s over the Hawkesbury River and this justifies building a super-highway on the site is complete nonsense. It is not a rational reason for the destruction of such a significant heritage asset. In the same vein, the precedent of the 1934 'cutting' cannot form a justification for increasing the volume and size of vehicles in a heritage precinct.

The EIS appears to use a single image, an 1809 watercolour by George Evans (EIS, page 161), to create the impression a precedent exists for a route on the eastern side of Thompson Square. While Evans was an explorer and surveyor, given the ample written and photographic evidence to the contrary, a single artistic watercolour is hardly the basis upon which to take such a significant step.

Nonetheless, throughout the process of the Windsor Bridge Replacement Project (WBRP), much has been made of the proposed Option One following the "historic alignment" of the so-called "original road" through Thompson Square.

In a letter on behalf of the Premier of NSW, Mr John Ajaka says, "Significantly, the upgraded approach road will be built over the original early nineteenth century bridge approaches." (Old Bridge Street) (See Attachment A).

Numerous examples of this claim, made by local politicians, are detailed in Attachment G . In addition, the Hon. Duncan Gay, MLC as Minister for Roads, on August 14 last year said, in Parliament in answer to a Question Without Notice from the Hon. Peter Primrose MLC, "Significantly, the upgraded approach road will be built on the original nineteenth century bridge approaches—there have been bridges there before—called Old Bridge Street"

https://www.parliament.nsw.gov.au/prod/parlment/hansart.nsf/V3Key/LC20120814038

This answer reveals the extent of the ignorance surrounding the "Precedent Argument". Perhaps more disturbing is the absence of any reference in the EIS to material such as maps and surveys which challenges the so-called 'precedent'. Maps and surveys showing any evidence countering the use of Bridge-Old Bridge Street route to the river are absent from of the main volume of the EIS, buried instead in the "Working Papers" where readers

are less likely to spot the inconsistency between Government and RMS claims and historical evidence.

This arrangement clearly denies all but the most diligent of interested readers the opportunity to access all relevant information.

However, for those appalled by the proposal, reference to external sources makes it possible to establish where the "historic" route to the bridge lies – and it is not along the alignment of what is called "Old Bridge Street", neither does it take much research to find where these "previous bridges" were – and they were not over the Hawkesbury River. Both of these matters are dealt with below.

# i.)The "Old Bridge Street Route"

The evidence that counters the Government and RMS claims is outlined below:

## Topography

The overall incline between the current bridge deck and George Street today is approximately 1:8. This is significant. By way of comparison AS/NZS 1428 calls for a 1:14 slope for access ramps. Today, even with Old Bridge Street cut into the slope to ease the climb, the gradient is 1:4.5. The original historical gradient, based on measurements at the boundary of 4 Old Bridge St indicates an original slope closer at times to around 1:3.5, a significant incline for even unencumbered human foot traffic; impossible for loaded vehicles pre 1934. Presently the footpath from 4 George St to the wharf is so steep as to be generally unusable.

## - Cartographic and Photographic Evidence.

Examination of the documentation of the Square fails to support the 'Precedent Argument'. The evolution of traffic routes can be clearly seen in these maps (Attachment B) and illustrates the impact the steep incline had on the routes taken. The routes are an absolute reflection of the slope of the Square, using the same strategy employed in the nearby Zig Zag railway of travelling across the slope, rather than directly up it.

It is reasonable to ascribe this strategy to transport technology of the day. Until relatively recently vehicles, horse-drawn and motorised, did not have the power to haul even modest loads directly up what was known as 'Punt Hill'.

## Contemporaneous reports

Reports such as newspaper articles and official records further discredit the 'Precedent Argument'

The route from George Street to the river was a constant cause for complaint. The press of the day report it a steep, winding climb. The track or road was difficult to maintain and was in frequent need of repair due to water damage. Sometimes the route was in such poor condition that Council stopped access. Signs were erected stating "No Thoroughfare – Dangerous" (Attachment D)

In fact, the route caused so much trouble it wasn't gazetted until the turn of the 20th century. It wasn't until official government maps were prepared in 1894 and again in 1898 by surveyor, Charles Scrivener that the route appears on an official map, albeit un-named. (EIS Historic Working Paper, page 94)

Indeed, the Hawkesbury Chronicle and Farmers Advocate (22.9.1883) notes the route was never recorded on the Parish Roads Trust and it was never officially recognised with a name and contemporary press reports show the road was not a responsibility of the Government but instead under the control of the Council (Attachment D).

However, this original, historic, yet un-named route to the wharf, ferry then bridge was locally referred to as "**Punt Hill Road**". This name, while not recorded on official maps and surveys was commonly used, even by the Mayor and local Councillors, including in official minutes of meetings as noted in the press of the day (Attachment D)

### Anecdotal Advice

Ms Roma Armstrong was born at what is today known as 6 Bridge Street Thompson Square. The year was 1917. Roma has lived all her life in Thompson Square, never living anywhere else and remembers well life in Thompson Square and Windsor before the present cutting was made.

Roma currently owns 4 Bridge Street. Recorded interviews were conducted with her on 30th of May and 18th of October 2012. An extraordinarily alert and lucid interlocutor, Ms Armstrong has provided very clear first hand reports of the routes through the Square prior to 1934.

Ms Armstrong is quite clear on the use of the dirt extension of Bridge Street stating: "Nobody used as it was far to steep. More often people used Kable St and the Terrace to reach the bridge. Sometimes they would use the road from the Macquarie Arms down to the Doctors House. Now and then somebody might use 'the track'" (Punt Hill Road). (R. Armstrong)

"Nobody used Old Bridge St for traffic access to the bridge. It was only used to access the properties at 6 and 10 Bridge Street". (R. Armstrong)

In fact the Armstrong's postal address in Thompson Square was just that "Thompson Square". Their postal address was never "6 Bridge Street, Thompson Square". This addressing format is confirmed by advertisements for Craignish Hospital (10 Bridge Street). The address was given as "CRAIGNISH PRIVATE HOSPITAL, THOMPSON'S SQUARE, WINDSOR" (Attachment G). The address was never "Bridge St, Thompson Square".

## - Nomenclature

Definitive evidence exists to establish the following:

- Bridge Street was named for its relationship with the bridges which, over time, crossed South Creek; (Attachment E)
- The South Creek Bridges were called 'Windsor Bridge' prior to the construction of the Hawkesbury River Bridge. (Attachment E)
- Even though it was never given an official name, the historic route to the river was known locally as "Punt Hill Road". The section of Thompson Square it climbed was known as Punt Hill. (Attachment E)

The assumption that the name 'Bridge Street' reflects a relationship with the Hawkesbury Bridge is unsustainable; an easy, unjustified assumption to support Option One. The name 'Bridge Street' predates the bridge built over the Hawkesbury by at least 41 years (Sydney Monitor, 29-6-1833). This is demonstrated in the sequence of historical maps and analysis in Attachment B.

Furthermore, for 61 years the bridge connecting Windsor to the rest of the world across South Creek was the only bridge in Windsor. It was THE Windsor Bridge and both official government tender documents and newspaper reports of the day confirm this general usage up until the Hawkesbury crossing was completed. (Attachment E). The assumption that the name 'Bridge Street' reflects a role in the Hawkesbury crossing is facile, driven by a quest for easy justifications and is not substantiated by the facts.

### ii.) "Previous Bridges"

"There have been bridges there before" (sic)

- NSW Roads Minister Duncan Gay. Hansard, 14th August, 2012

There has only been one permanent bridge crossing of the Hawkesbury at Windsor: it was built in 1874 by William Dixon and Andrew Turnbull.

The "previous bridges" were the old timber bridges across South Creek. People in Sydney referred to the South Creek bridges as "Windsor Bridge".

There is ample evidence to show that prior to 1874 the term "Windsor Bridge" did not apply to a bridge over the river but rather the bridge over South Creek (Attachment E)

A fine example of this is from the *Colonial Secretary's Office* on the 18th July 1836:

"It being intended to build a Stone Bridge over South Creek, near Windsor. Persons disposed to contract for the performance of this work, are requested to transmit their tenders to this Office, by 12 o'clock of Friday, the 19th of August, endorsed " **Tender for Windsor Bridge**" (Attachment E)

Another earlier example speaks of multiple "Windsor Bridges. From 12-9-1829: "Three Windsor bridges have now been built in less than five years, if we recollect right. It is said that it is the large white grub eating into the piles below water has caused these' bridges to fail." (Attachment E)

#### Conclusion

There is no justification on the basis of historical precedent for locating a new, four-lane intersection within the heritage precinct of Thompson Square.

Even if such a precedent existed (and it doesn't) it does not constitute a valid reason for what is proposed.

The road known as Old Bridge Street was never the traditional route to the bridge as it was far too steep. (Attachment E Gazette 11-3-1927)

The press from the day clearly points out that a road on the alignment of Old Bridge Street was never the route to the river and was never classified as a Main Road. (Attachment E Gazette 1-6-1928)

Even with today's advanced machinery and technology it is still a steep climb.

Although never given an official name, the historic route to the river was known locally as "Punt Hill Road". The section of Thompson Square it climbed was known as Punt Hill. Starting below the Macquarie Arms hotel near Howe House, the route wove a parabolic line down Thompson Square to the wharf and ferry.

There was no beast or machine that could have carried a load up the gradient on the eastern side of Thompson Square now known as Old Bridge Street.

Claims made by the Members of the NSW State Government (Attachment F) like many aspects of the Windsor Bridge Replacement Project, do not withstand reasonable research and scrutiny.

It would appear Minister Gay in making references to 'bridges there before' is deliberately confusing the three 'Windsor Bridges' across South Creek which were, prior to the construction of the Hawkesbury River Bridge, known as Windsor Bridge.

Any claim of heritage value associated with any particular route through Thompson Square is completely baseless.



ML12/07202

Ms Megan Wood 290 Windsor Street RICHMOND NSW 2753

### Dear Ms Wood

Thank you for your letter to the Premier about the preferred option for the replacement Windsor Bridge. The Premier has asked me to respond on his behalf.

On 1 November 2011 a new organisation called Roads and Maritime Services (RMS) replaced the Roads and Traffic Authority and NSW Maritime. RMS will focus on service delivery, concentrating on the key tasks of building and maintaining road infrastructure and the day-to-day compliance and safety for roads and waterways.

RMS considered nine options for the bridge and approaches and selected the one that offers the most value for money while best meeting the requirements. The design will offer motorists a modern, higher level bridge with upgraded approaches providing smooth, improved road conditions for all vehicle types through the northern side of Thompson Square and across the river to Wilberforce Road.

RMS advises that the new bridge will be designed to meet current load standards for heavy vehicles, and it will be wide enough to enable them to pass without waiting. The 15.5 metre wide bridge will be linemarked for one lane in each direction and include road shoulders and a shared path for added vehicle, pedestrian and cyclist safety. It has been designed to maintain access during a 'once in five year' flood.

I acknowledge your concern and others in the community about a major road being built through the early 19th century Thompson Square. In order to alleviate this concern RMS will lower the level of the new approach road to reduce its visual obtrusiveness within the historic precinct. This has been made possible by lowering the planned speed limit on the approach road through the square from 60 km/h to 50 km/h.

Significantly, the upgraded approach road will be built over the original early 19th century bridge approaches (Old Bridge Street).

This will reunify the open space, restore the original shape of the Thompson Square reserve and once again allow a view of this very significant heritage asset as it originally was. In addition, the realignment will allow unimpeded access to the river for the tourists and local residents in the park.

RMS is working with the Heritage Council of NSW and the NSW Office of Environment and Heritage to develop a concept design and environmental impact statement for the proposed bridge and the approaches through Thompson Square. The environmental impact statement will be submitted to the Department of Planning and Infrastructure and placed on public display in late 2012.

The environmental impact statement will provide a record of the existing heritage, traffic, noise and other environmental conditions. The statement will outline the anticipated effects of the construction of the new bridge and approaches on Thompson Square and the ongoing impact when the bridge is opened for traffic. The environmental impact statement will also list recommended management and/or mitigation measures for those effects and provide the justification for the chosen option against cost, social and environmental criteria. The public will be invited to make submissions on the environmental impact statement. RMS will present a submissions report to the Minister for Planning and Infrastructure for his consideration and final determination.

Residents are invited to attend an upcoming meeting where RMS's project team will answer any questions, outlining plans for the site and show an interactive guided tour of the new bridge.

This meeting will be held at:

 Windsor Marketplace Saturday 8 September 2012, 10am to 2pm

I hope this has been of assistance. For more information please contact Mr Peter Letts, General Manager Project Management, at RMS on (02) 8849 2069 or visit the Windsor Bridge project page on the RMS website (www.rms.nsw.gov.au/windsorbridge).

Yours faithfully

4 - SEP 2012

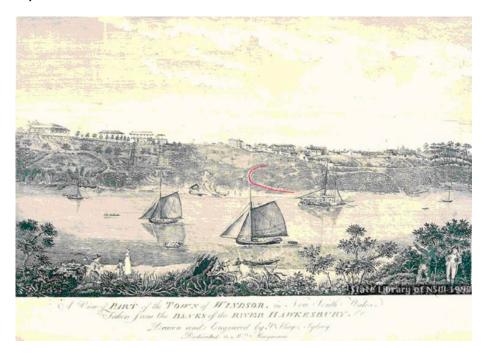
John Ajaka MLC Parliamentary Secretary for Transport and Roads

# ATTACHMENT B: MAPS AND IMAGES

EIS History and Heritage Working Paper 1, page 87: ""There is little evidence for how the roads developed in the square during the later part of the nineteenth century other than what is shown in images from the 1870s. The surveys showing the square in the 1840 and 1850s give little indication of roads; in fact none are shown."

This is simply not true. The following nine maps and historical paintings provide a great deal of information.

# A.) 1813



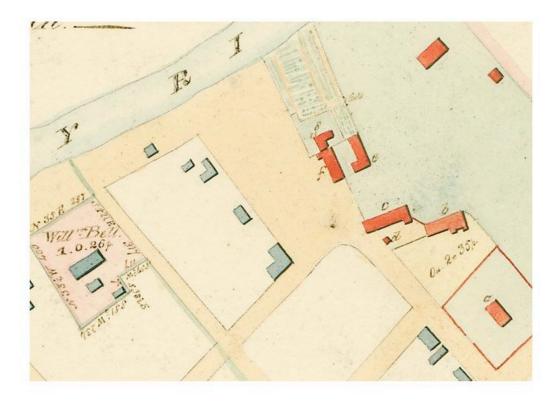
This image by Slaeger establishes certainly one of the earliest routes taken from the riverbank up the public domain. It is highlighted here with a red line, clearly this route cannot be equated to today's 'Old Bridge Street'.

# B.) 1814

The following map, a section of a map published in 'Macquarie's Towns (Professor Ian Jack, 2010 – full image available on line

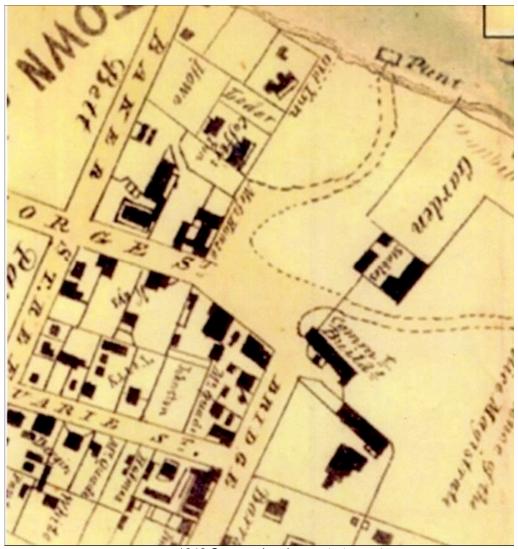
http://www.baseline.nsw.gov.au/exhibitions/macquaries-towns/windsor2.html) clearly reveals the existence of a road approaching Thompson Square from the south on the alignment of Bridge Street today.

Professor Jack advises this road has always been known as 'Bridge Street'. It should be noted that **this roadway ends where it joins George Street**.



1814: No evidence to support the precedent argument

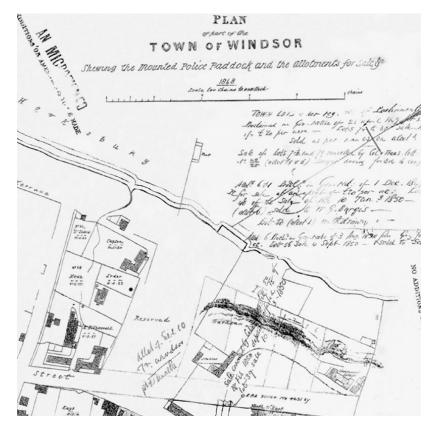
By 1842 the Armstrong survey clearly shows a track or dirt road winding from west to east through Thompson Square. It also shows a track or dirt road extension of George Street leading to Government House. For some period this extension of George Street was known as North Street. This is noted on the Town Plan of 1848.



1842 Survey showing route to punt.

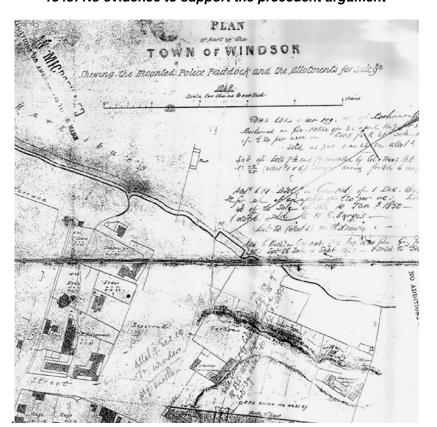
Note: This route to the punt was left out of the Town Plan of 1848. However it reappears in the 1863 image by Henry James Lloyd.

1842: No evidence to support the precedent argument



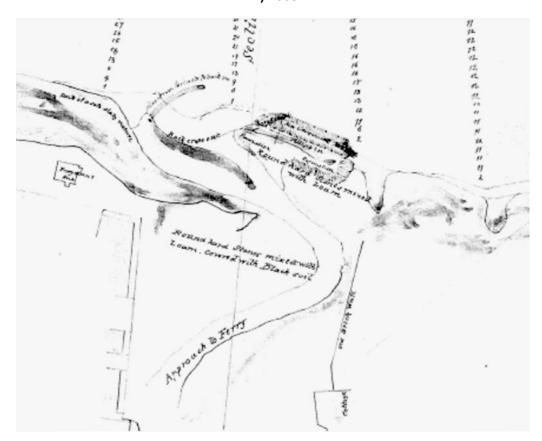
# 1848 Town Plan (clarified)

Interestingly the 1848 Plan of the Town of Windsor shows the track to Government House is now a gazetted road labeled North Street. However the track through Thompson Square is not shown in this image.



1848: No evidence to support the precedent argument

1848 Town Plan (Original)



1863 image by Henry James Lloyd.

On his map, above the indication of the "Approach to Ferry" Lloyd notes that Punt Hill Road is made of "Round hard stones mixed with loam. Covered with black soil". This is the same sweeping alignment, (see 1813 image, above) drawn half a century earlier by Slaeger in 1813.)

1863: No evidence to support the precedent argument

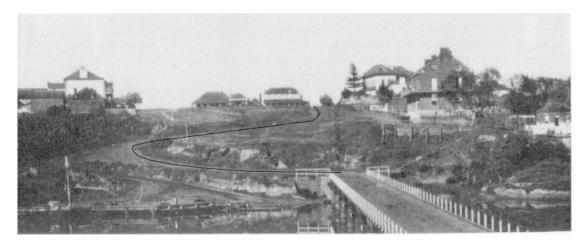
F.) c1875



**Thompson Square circa 1875** 

In this image Punt Hill Road can be clearly seen. Two people are standing on the road showing how it is cut into the hill.

Punt Hill Road is clearly visible in this 1879 photograph.



**Thompson Square 1879.** 

"Old Bridge Street" does not exist in this 1879 image. There is only "Punt Hill Road" The roads are still as drawn by Lloyd in 1863. There is no traffic connection to the bridge along the length of the eastern side of Thompson Square

Note that the area in front of 6 and 10 Bridge Street is still the same as the reserve. While there is a fence there is not a macadamized road.

Nonetheless, EIS Vol 1, page 152 draws states: "In 1885 there were reports that the roads on the eastern side of the Thompson Square were lowered by up to a metre to improve drainage, vehicular and pedestrian access. This work would account for the loss of the tar or bitumen that may have been used to seal the road in 1855 and any later pavement works between that year and 1885."

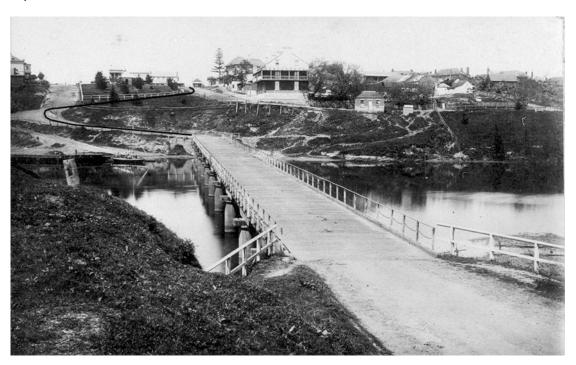
"Tar or bitumen that may have been used to seal the road in 1855"???

Really? An interesting hypothesis given tar and woodblocking was not used on Sydney roads until the 1880's with Bitumen not being introduce until 1929! In fact dusty Macadam roads dominated Sydney well into the 20th Century.

 $http://www.cityofsydney.nsw.gov.au/history/sydneystreets/How\_to\_Build\_a\_Street/Woodblocking/default.html\\$ 

http://www.history.sa.gov.au/chu/programs/sa history/roads/road history/surfaces.htm

This photograph from 1879 (above) as well as the 1888 image and the RAAF image from 1929 (below) show the roads in Thompson Square were not sealed with tar or bitumen. This is supported by anecdotal evidence from resident Ms Armstrong.

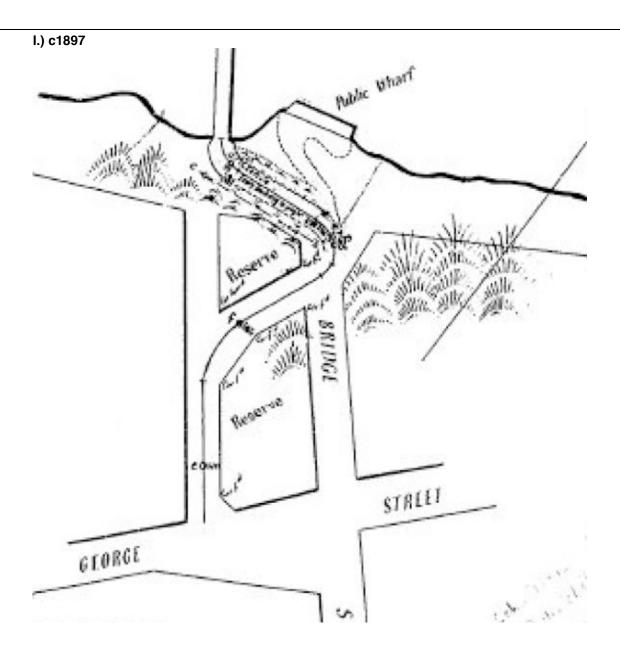


**Thompson Square 1888** 

While the section where it divides the Square is in a cutting, Punt Hill Road is still clearly visible in this image from 1888.

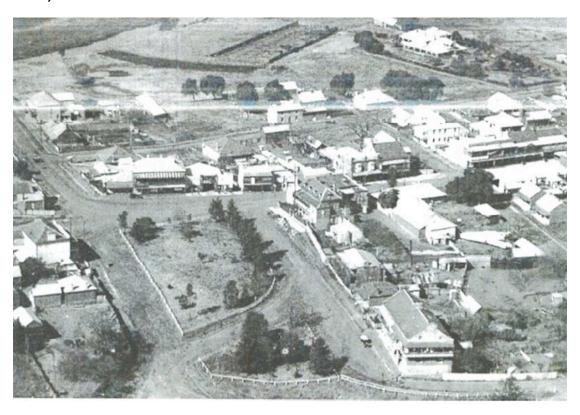
In this image the extension of Bridge Street is actually connected to Punt Hill Road. Cuts have been made in the hill to enable the connection of both roads. However the extreme gradient of the Bridge Street slope is plainly evident. Note also the much gentler slope of the road on the western side of the Square. After connection to the Terrace was made, this became the favoured route through the Square to the bridge (R. Armstrong)

Despite the raising of the bridge in 1897, this extreme gradient of Bridge Street remained unchanged. The raising of the bridge only affecting the gradient of lower Punt Hill Road as the upper stayed the same.



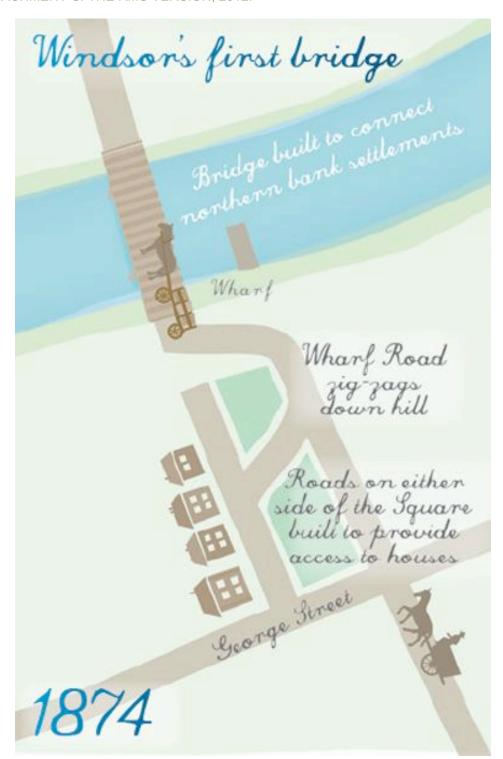
A part of the plan to raise the bridge in 1898. This clearly shows the designated route to the river through Thompson Square.

NOTE: There appears to be foliage, a cutting or obstruction at the junction of Bridge Street and Punt Hill Road.

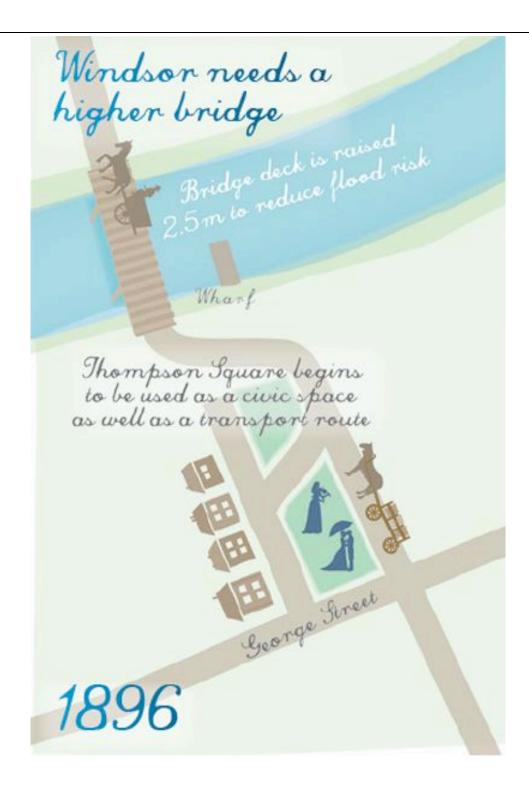


The 1929 RAAF image clearly shows the traffic wear on the roads.

*NOTE:* There is no traffic wear on the road now known as Old Bridge Street. Careful observation shows erosion on the steep section where Bridge St joins Punt Hill Road.

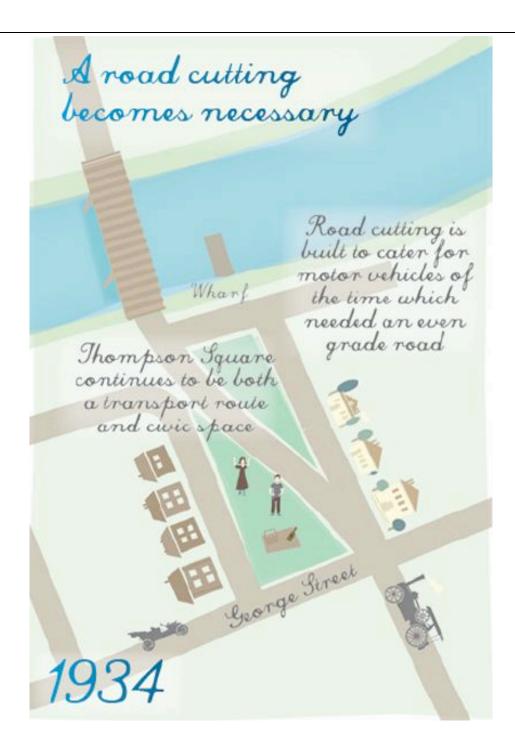


Note the RMS has omitted the houses on the eastern side of the Square. This drawing shows Bridge Street connected to Punt Hill Rd. Refer to photographs from 1879 (above) for actual conditions within the Square



Still no houses recorded on the eastern side of the Square by the RMS.

The image shows horses pulling loads on Bridge Street in the Square, which they never did, due to its severe gradient.



Houses finally appear on the eastern side of the Square.

Even in this case, precedent does not excuse inadequate strategic planning.

### ATTACHMENT D: PERIOD PRESS ON THE ROUTE:

The Sydney Morning Herald 26-1-1854

"THE PUNT HILL. We beg to call the attention of the public of Windsor, and we would say more particularly of Wilberforce, for the traffic to and from the latter place is considerably the greater of the two over it, to the dangerous state of this thoroughfare. The late very heavy rains have washed the soil at the side of part of it completely away, and left a deep gully, into which if a horse passenger fell in the dark he would most assuredly meet with a serious accident. Whilst therefore subscriptions are being raised for the repair of other streets, we trust this indispensable thoroughfare will not be overlooked.

### Gazette 21-9-1889

"It is high time that some steps were taken to put the Punt Hill in a better state of repair than it is now in. It is sheer cruelty to horses to make them haul heavy loads of water along that incline." (Gazette 21-9-1889)

### Gazette 15-11-1890

"Numerous well-grounded complaints have been made recently respecting the condition of the Punt Hill, which is in a rough state. It is terribly hard upon the poor animals which have to draw loads up from the bridge – in fact it is difficult enough for a horse to pull an empty vehicle up – let alone one with a load."

### Gazette 4-2-1893

Mr Burdekin (MP) has written to the Minister for Works, re necessity for improved access at each end of Windsor Bridge, and pointing out that the incline is so great that *no team that can be put together can draw more than 3 tons up the Punt Hill.* 

### Gazette 8-2-1902

"With regard to the punt hill, the Government had nothing to do with it; it was in the hands of the Borough Council."

# Gazette 11-3-1927

".... The Board, however, was of opinion that there should be a through connection between Main Road No 92 and Main Road No. 93, and the obvious route for this connection was to begin at the bridge and go east straight up the Bridge-street hill to George street.

This route, however, was steep, and some improvement would be necessary before it could be recognised as the Main Road route.

Perhaps a survey by one of the Board's engineers might show that it would be practicable to improve the gradient, but at present the Board could not spare an officer to make the investigation..."

### Gazette 1-6-1928

## WHICH ROAD? MAIN ROUTE TO RIVER TRAFFIC PROBLEM AGAIN

"In view of the enormous amount of motor traffic using Kable and Terrace streets, between George Street and the bridge over the river, the Mayor (Ald. Dean) suggested in a mayoral minute to Windsor Council last week that the Main Roads Board be asked to have that portion of the road declared a Main Road, thereby linking up Main Roads 92 and 93. The Mayor said that the (Mains Road) Board would have to provide against engineering difficulties on the old Punt Hill Road - a cutting would be necessary to ease the grade - and it might be considered a better proposition for the Main Road to follow the Kable Street route.

Ald. Ross stated that two years ago they had a Conference in Sydney on the same subject, and Mr. Garlick (Chairman of the Board) produced maps *but was unable to determine which route was the Main Road.* He stated that he would go further into the matter."

19-8-1826

"Tuesday, AUGUST 8 -Jeremiah Malowney, of the Windsor bridge gang, was charged that he was drunk, and absent from the church muster on sunday last. A constable who went to apprehend the prisoner, deposed that he found him in a state of inebriation, and that the prisoner, when asked why he did not attend tho muster, replied, in terms too awful to describe. Sentenced for diabolical language and drunkenness, 35 lashes" (The Sydney Gazette and New South Wales Advertiser)

12-9-1829

"Three Windsor bridges have now been built in less than five years, if we recollect right. It is said that it is the large white grub eating into the piles below water has caused these' bridges to fail."

(The Sydney Monitor)

26-1-1831

"Several of our correspondents have equired of us what they are called upon to pay eight pence for, in crossing the Windsor Bridge & whether the prospect of breaking their necks or having a sound ducking at the least is the cause of the premium? (The Sydney Monitor)

23-7-1836

"Colonial Secretary's Office,

Sydney, 18th July. 1836. STONE BRIDGE NEAR WINDSOR.

IT being intended to build a Stone Bridge over South Creek, near Windsor. Persons disposed to contract for the performance of this work, are requested to transmit their tenders to this Office, by 12 o'clock of Friday, the 19th of August, endorsed " *Tender for Windsor Bridge.*" (The Sydney Gazette and New South Wales Advertiser)

11-9-1838

"The *Windsor Bridge* is in an awful state of delapidation. The road between Parramatta and Windsor requires more attention than has recently been bestowed on it." (The Australian)

Bart Bassett Hansard 18-10-12
"It will follow Bridge Street—that must mean there was a bridge there"
Kevin Conolly Hansard 18-10-12  " move the traffic from the middle of the square down along one side following the alignment of Bridge Street, which was the traditional access to the bridge."
Bart Bassett Hansard 29-3-2012  "That option would result in some remodelling of the roads to follow the original alignment of old Bridge Street, which currently leads to the wharf and historically has led to a number of wharves and crossings in the vicinity."
Ray Williams Hansard 29/3/12:  "Two hundred years ago when Thompson Square was proclaimed by Governor Lachlan Macquarie my forefather Charles Whalan sat at his side. That site was chosen and left aside for the recreational purposes of the people of Windsor. I can say firmly that the site was not dissected by Bridge Street at that time."  (Actually it was dissected by what would become known as "Punt Hill Road")
ATTACHMENT H: Craignish Hospital  Gazette 10-8-1923  "CRAIGNISH PRIVATE HOSPITAL, THOMPSON'S SQUARE, WINDSOR. All surgical operations. Medical and Maternity Cases taken. Outdoor Maternity Cases attended to. Miss L WILSON, A.T.N.A."

ATTACHMENT F: STATEMENTS REGARDING ALIGNMENT