

April 29, 2022

Mr Keith Ng  
Planning and Assessment  
Department of Planning, Industry and Environment  
Locked Bag 5022 200 Cantonment Road,  
Parramatta, NSW 2124

Dear Sir/Madam,

RE: SYDNEY METRO WEST ENVIRONMENTAL IMPACT STATEMENT - SSI-22765520

The McDonald College, established in 1984, is Australia's only independent, co-educational, non-denominational school from Kindergarten to Year 12 that integrates excellence in performance (performing arts, tennis, rhythmic gymnastics and technical production) and academic studies to the NSW Higher School Certificate. Our College specialises in elite performance, creativity and personal fulfilment through a rigorous academic programme integrated with intensive daily performance training.

The College also includes a boarding house for students who live full time on our North Strathfield campus during school term and also conducts a range of programmes, performing arts training and performances that occur outside of traditional school hours.

Whilst overall The McDonald College is supportive of the Western Sydney Metro project given the obvious public transport benefits, we are deeply concerned about the complete lack of consultation by Sydney Metro West and the inherent impacts to operations of the College which do not appear to be adequately considered, assessed and mitigated.

The McDonald College Operations

As a result of The McDonald College's unique curriculum, operational hours extend well outside normal school hours on a daily basis both during term and non-term times. This extends to after-hours performances and classes in evenings and weekends.

Monday to Friday, The College generally operates between the hours of 7:30am and 9:00pm daily, with the extended hours required to cover the student's educational curriculum and combined performance training. The after-hours programme typically extends from 7:45am to 5:00pm on Saturdays.

The McDonald College also runs a boarding house on site, with students living there fulltime, 7 days a week for at least 42 weeks of the year.

Given the unique nature of The McDonald College's curriculum, after-hours performances are regularly held in the evening and occasionally on weekends in addition to the regular classes and performing arts programme. These performances extend to:

- Music showcases
- Musical
- Full-length Classical Ballet
- Plays
- Music competitions
- HSC practical showings

HSC examinations run from mid October to mid November annually, with HSC trial examinations in August. Prior to these examinations there are additional periods of intensive study for our HSC students that are regularly conducted out of school hours.

In addition to the educational operations of The McDonald College, parts of the campus are hired to third parties to derive much needed funding for the College. On Saturdays and Sundays, parts of the campus are hired to another education provider that runs academic tutoring for students of all ages. On Sundays the main conference centre at the College is hired to a local Church between the hours of 8:00am and 4:00pm.

A lack of consultation with The McDonald College by Sydney Metro West or their Consultants has resulted in the impacts during construction to The McDonald College and the educational operations on the school campus being inadequately considered and assessed by the EIS.

### Consultation

The McDonald College has reviewed the exhibited EIS for the proposed North Strathfield Metro Station and as an educational organisation that is an adjoining landowner who will be heavily impacted by the proposed Metro Station, we are disappointed with the complete lack of consultation by Metro with the College. In 2020 when the initial tunnelling EIS was exhibited, Ecove Group who were acting in the capacity of advisors to The McDonald College, met with several senior members of the Metro Team and were provided with assurances that there would be direct consultation with the College during the next stages of planning for the Metro Project. It is our understanding that at this meeting the members of the Metro team were made aware of The McDonald College's unique educational model and that the hours of operation were vastly different to a traditional school.

This consultation has never occurred and as a consequence the operational impacts of The McDonald College and the safety and wellbeing of our students and staff have not been adequately considered or assessed by the EIS for the North Strathfield Station.

Sections of the EIS talks about consultation with key stakeholders, which is primarily limited to Government Departments and Canada Bay Council. Is not The McDonald College, a significant educational facility that adjoins the North Strathfield Station/Metro Station with a 192m boundary a key stakeholder?

## Construction Impacts

The EIS does not include any details or assessment of construction dust pollution impacts or provide any details of approaches to mitigate dust pollution during construction. Many of the students and some staff at The McDonald College are asthmatic or have dust allergies. By virtue of the College's close proximity to the proposed Metro Station construction, with the closest construction proposed to be directly adjacent to the boundary of our school's campus, impacts of dust pollution are of a critical concern to The McDonald College.

The EIS and accompanying acoustic report indicate that impacts to The McDonald College from construction noise will be acceptable on most occasions during the week, with intermediate 'moderate' acoustic impacts. The McDonald College is unable to understand the true impacts on our students and staff during these times given the lack of consultation. A not-for-profit educational provider should not be required to engage, at considerable cost, acoustic engineers to understand these impacts.

The EIS and accompanying acoustic report indicates that there is likely to be considerable noise impacts during work in the heavy rail corridor, which will happen on more than 30 days during 'track possessions' and that this will include night work on many if not all occasions. The EIS and acoustic reports conclude that this will not impact The McDonald College on the basis that it will occur on the weekend. As noted above, given the hours of operation on the campus and the existence of a boarding house on site, this is clearly not the case.

The Acoustic Report and notable Table 4I notes that there will be 'High' sleep disturbance impacts at one residential receiver on Queen Street. This is not assessed as an impact on The McDonald College due to the assumption that there is nobody sleeping at the College. With upwards of 45 boarders at the school at any point in time this is not correct. As the residential receiver that is assessed as a 'High' sleep impact is further away from the rail corridor the sleep impacts for our boarding students located much closer to the noise source is likely to be considerably higher.

It is critical for the health and wellbeing of our boarding students and supervisory staff that they achieve proper uninterrupted sleep. Sleep disturbance for students during critical examination periods such as the HSC has the potential to significantly impact their performance and HSC assessment.

Without consultation The McDonald College has little comfort that these issues can or will be mitigated. Leaving this up to a private sector contractor who is under considerable time and cost pressures to manage will expose the College and its students to the likelihood that these impacts will not be appropriately or adequately mitigated.

## Access

The EIS does not provide any commentary or assessment relating to impacts to students and staff accessing The McDonald College. The College is concerned that these impacts have not been adequately considered or assessed.

The McDonald College currently, and for many years, has enjoyed the benefits of a direct access gate from our campus to the North Strathfield Station. Not only is this gate convenient for students and staff, it also assists the College greatly in ensuring the safety and security of students who travel by train. Students being able to access the train directly as opposed to needing to leave the grounds to access the Station via the surrounding streets provides a much safer option.

Looking at the proposed station concept, the plan to provide access for those on the western side of the heavy rail line by overhead bridges is poor. The solution harks back to the beginnings of Sydney's rail network 100 years ago and seems highly inappropriate for a modern metro system. The McDonald College has concerns regarding the capacities of the overhead bridges and lifts etc and the potential for students to be caught in crowd crush situations during peak times, which could occur in particular when large events are on at Sydney Olympic Park.

Overhead pedestrian bridges such as the arrangement that currently exist provide poor weather protection during weather events such as the heavy rain Sydney has recently experienced. With predictions that these types of weather events are likely to become increasingly common, the access approach would appear to be particularly short sighted.

The narrow pathway next to the rail corridor also does not provide a very good level of safety for users, particularly at night.

## Traffic Impacts

The road network around North Strathfield is already under considerable pressure during peak periods in the mornings and afternoon. The analysis contained within the traffic report that forms part of the EIS confirms that this is the case. Despite this the traffic modelling and assessment of the impacts on traffic in the precinct during construction ignores the impacts of construction workers travelling to site by car.

The construction vehicle movements appear arbitrary and without support as to how these have been estimated, particularly as no numbers of workers have been forecast. The EIS traffic study and report has ignored the impact of construction workers driving to the site on the premise that they will all be encouraged to travel to site by train. Given the early start times and long hours experienced by workers in the construction industry, it is not reasonable that serious impact assessments be based on unlikely scenarios such as this in a non-CBD location.



Section 3.2.6 acknowledges that construction workers could potentially take up all day parking spaces in surrounding streets, however despite this, the assessment and modelling has ignored construction worker traffic and offers no mitigation of the traffic and parking impacts that result. In fact, as there is no estimation of the size of the work force during construction the size of the potential issue is not even considered.

On page 10-24 of the EIS it concludes that “all other intersections would perform at the same level of service with or without construction traffic”. This statement is highly misleading as these intersections are currently operating at a service level of ‘F’ or in simple terms they are over capacity and at failure. The fact that there is no service level after ‘F’ is the only reason that they operate at the same level in both conditions.

In essence, the true impact of the additional construction traffic has not been assessed adequately and it is proposed to do nothing to mitigate this situation. The additional gridlock in surrounding streets will have a large impact on students, staff and parents trying to access The McDonald College on a daily basis.

### Parking

The EIS indicates that there will be removal of 24 on-street parking spaces on the western side of Queen Street between Wellbank and Pomeroy Streets without replacement of these parking spaces. This action will push these commuters into an already congested George Street seeking parking resulting in an increased safety hazard for the McDonald students and community. This impact will be further heightened by increased parking demand generated by construction workers who are working on the proposed Metro Station seeking parking in the nearby streets.

The EIS proposes a Kiss & Ride in front of the entry to Our Lady of the Assumption that neighbours The McDonald College. This location is not only a poor choice from the aspect that it is proposed to be located in a relatively narrow and short dead-end street, but at peak times when it is most likely to be used it will be in direct conflict with student drop offs for this school. In addition to the high likelihood that this will cause traffic impacts within the area that could impact traffic flow on George St at peak times, this proposal presents a clear risk to student safety. Increased car volumes and traffic chaos in close proximity to a large number of children will be an accident waiting to happen.

The traffic report that is included with the EIS contains no analysis of traffic impacts stemming from the proposed Kiss & Ride or assessment of the risks to children arriving or departing from the school. No mitigation measures for this risk are proposed.

### Safety

The EIS does not adequately consider the safety of school students accessing both The McDonald College and the neighbouring primary school Our Lady of the Assumption. There is no assessment of the increased risks for students of accessing both schools in close



proximity of construction zones and with significantly elevated numbers of vehicles in surrounding streets and in particular heavy construction vehicles.

### Built Form Impacts

From the EIS it is not overly clear what all of the built form impacts that there could be for The McDonald College campus. We note that the EIS is misleading in terms of the height of the station building on Queen Street, section 10.2.2 states that the building will rise 6 to 7 storeys above street level, yet the massing shown in Section 10.9 and the section shown in Figure 10-2 indicate a significantly smaller structure of around 3 storeys.

The EIS also does not define what floor to floor heights the 6 to 7 storeys will be. The floor to floor heights typical in this type of infrastructure could result in a built form of around 25-30m in height, or a 9 to 10 storey residential building by comparison. Given the scale of the proposed structure the EIS should include shadow analysis to assess impacts on surrounding properties and in particular the eastern play spaces at The McDonald College that adjoin the boundary of the heavy rail corridor.

There is no commentary in the EIS around impacts to trees and vegetation along the boundary between the College and the heavy rail corridor, which provides an element of privacy and outlook for our primary school outdoor play spaces.

Figure 10-21 of the EIS indicates that the proposed new pedestrian bridge will be very elevated above The McDonald College campus. The EIS contains no details on what the likely height of this bridge will be and no analysis of the potential over viewing privacy issues that this will create for our students. This structure has the potential to create a viewing platform for individuals to watch students at play and within the College grounds.

### Structural Damage Risk

There is no consideration within the EIS of the risk of structural damage to The McDonald College's buildings, despite the closest construction work proposed occurring only a few short meters from some of our buildings. There has also been no consideration of mitigation measures to protect the College's buildings from damage.

### Conclusion

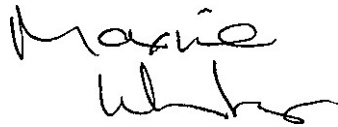
In conclusion The McDonald College feels that the EIS is highly deficient in a number of critical areas and has not properly considered and assessed the impacts of the proposed development. This is particularly relevant in light of two educational institutions of significant scale bordering the site where this significant infrastructure is to be built. This is clearly evident in the case of the construction impacts on The McDonald College and the complete lack of any consultation with the College.

Table 10-32 of Section 19.12.4 is the only section of the EIS that appears to clearly acknowledge that there will be impacts on The McDonald College and the neighbouring Our

Lady of the Assumption primary school and that further work to mitigate these risk and impacts is required. Oddly, the mitigation process proposed is “ongoing engagement with the NSW Department of Education to investigate feasible and reasonable mitigation measures”. As both schools are non-Government schools and not funded by or under the control of the NSW Department of Education this is not a mitigation strategy, the only appropriate mitigation path is dialogue with the schools directly, which in the case of The McDonald College has been non-existent to date.

The process of approval is seriously flawed if approval can be granted for this infrastructure project without appropriate levels of consultation with key stakeholders, the proper consideration and assessment of impacts along with the adequate proposal of appropriate mitigation measures.

Sincerely,



M P Kohler  
Principal