

To: NSW Department of Planning, Industry and Environment
Attn: Gabriel Peters Shaw, Senior Compliance Officer
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

Ref: **Independent Environmental Audit Report No. 5 – Pitt Street North Over Station Development**

Date: 26 June 2025

Dear Gabriel,

I am writing to advise you that the fifth Independent Environmental Audit (Post Occupation) on Pitt Street North (now known as Parkline Place) was undertaken on 6 May 2025. APP Corporation Pty Ltd (known as the APP Group) was the Independent Environmental Auditor and completed the audit in accordance with the following Condition of Consent:

A31: Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).

The report is attached in accordance with the following Conditions of Consent:

A34: In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must:

- (a) Review and respond to each Independent Audit Report prepared under this consent;*
- (b) Submit the response to the Planning Secretary; and*
- (c) Make each Independent Audit Report, and response to it, publicly available 60 days after submission to the Planning Secretary.*

A35: Independent Audit Reports and the Applicants response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approvals Requirements (2020), unless otherwise agreed by the Planning Secretary.

The applicant notes that there were 2 non-conformances which were raised during the audit and closed. These are as follows:

Non-compliance 1 – A32 – Independent Environmental Audit

Due to the planned proximity of the completion of the project coinciding with the next Construction Independent Environmental Audit, a request was lodged with the department to postpone the

Construction Independent Environmental Audit and move straight to the Post Occupation Environmental Audit. There were, however, delays with the completion date, and this moved beyond the originally scheduled date for completion. The applicant notified the department but did not clearly communicate the need for an extension to its original request. The department provided a response confirming it acknowledged that the extension was asked for; however, it was not done in compliance with the Conditions of the Consent. The department advised that the applicant could proceed with the Post Completion audit in this instance. The applicant has put measures in place going forward to ensure that requests to the department are made in line with the conditions of consent. This non-conformance is now closed.

Non-compliance 2 – E27 – Transport Access Guide

It was identified by APP that the Transport Access Guide did not fully address conditions (a) through (d) during the time of the audit. Following the audit, the document was updated and resubmitted by the applicant for review by APP. APP confirmed that the updated Transport Access Guide achieved compliance with the condition of consent and that the non-compliance was considered closed.

The applicant confirms that these non-conformances are closed and that learnings are being taken into future projects.

The applicant notes that the Independent Environmental Audit Report (no.5) has been reviewed, with five opportunities for improvement identified for the project. These are as follows:

Opportunity 1 – A36 – Independent Environmental Audit

It was identified by APP that although no non-compliances were identified during the previous audit, the evidence was not provided for the submission of the applicant's response to DPHI, for the Opportunity for Improvement (OFI) raised. The PS Developer has noted that for future submissions, it will ensure its responses are fully compliant with the conditions of consent, including Condition A36.

Opportunity 2 – C3 – Access to Information

APP raised that the complaints register for October 2024 and the applicant's response to IEA#4 findings are not available on the website. APP acknowledged works are now complete and that no complaints were received during the period. APP recommended updating the website to ensure full compliance with Condition C3. The applicant will make all information pertaining to this audit available as required by the Conditions of Consent.

Opportunity 3 – E3 – Notification of Occupation

It was identified by APP that the date of commencement of occupation was notified to the department as 30 September 2024; however, the commencement of occupation was delayed until 18 November 2024. The PS Developer notes that these delays were outside the control of the project, as the multiple trade union strikes significantly impacted the project. Going forward, the PS Developer has sought advice from the Certifying Authority to advise when a delay becomes significant, and notification should be given to the department.

Opportunity 4 – E26 – Green Travel Plan

APP noted that the Green Travel Plan recommends that travel surveys be undertaken biannually, however, no travel survey has been conducted to date. This was due to the low occupancy rate within

the building at the time. However, the building is 75% leased, and the PS developer and the Investa Building Management team have begun to undertake the travel surveys.

Opportunity 5 – G2 – Subdivision Certificate

Following discussions with APP and the applicant, it was advised that Section G of the conditions had not been triggered. However, the immediate evidence for this was not available. The applicant furnished the evidence post the audit, which satisfied APP that the conditions were indeed not triggered. The applicant has ensured that this document is available for any future audits.

Under Condition A36 of SSD 10375, the applicant requests the Planning Secretary to approve this request from the Pitt Street Developer North Pty Ltd to cease the ongoing and future Independent Operational Audits for Parkline Place. The applicant believes that the Post Occupation Independent Environmental Audit, which is the subject of this letter, shows that the development is compliant in operation. This request acknowledges that a release from the need to undertake the Independent Operational Audits does not relieve the applicant from having to comply with ongoing conditions that are applicable in SSD 10375.

If you have any questions, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'DBryan', written in a cursive style.

Danielle Bryan
General Manager
Parkline Place