

Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

14 March 2024

Ref: 1031449-LET-SY-001

To Whom It May Concern

Ref: SSD-23480429
253-267 Aldington Road, Kemps Creek
NABERS Commitment Agreement – Energy and Water Ratings

The below addresses the request for a NABERS commitment agreement that demonstrates the development can achieve a 5.5-star NABERS energy rating and a 3-star NABERS water rating.

We understand that this request is driven by the determination that this project constitutes a “large commercial development” with “prescribed office premises” (i.e. office premises with a net lettable area of at least 1,000m²) in accordance with Sustainable Buildings State Environmental Planning Policy (Sustainable Buildings SEPP) 2022. However, under the NABERS definition, this project would likely be determined as a “warehouses and cold stores”.

Energy

We are committed to attaining a suitable standard of energy use for the development equivalent to a 5.5-star NABERS Energy base building rating for a commercial premises.

Analysis has been conducted to understand the extent of electricity usage mandated by this benchmark, as delineated in the summary below and the NABERS reverse calculator presented in Appendix A.

Total maximum annual electricity usage	133,700 kWh
Total NLA of office space within the building *	2,154m²
Total hours per week the offices are occupied *	50 hours

** The input total NLA and total hours per week are best known estimates at this stage. The maximum annual electricity will vary should NLA and/or hours change.*

Our analysis encompassed a comprehensive grasp of the key initiatives incorporated by the Applicant, and we are confident in the project’s ability to attain the benchmark. The proposed initiatives to reduce energy use are as follows:

- Improved thermal performance through passive design strategies.
- Efficient building services, systems, and equipment to be specified and installed.
- Zoned lighting and HVAC and controls to avoid energy consumption associated with unnecessary lighting and space conditioning.
- Renewable energy to be generated on-site through photovoltaic (PV) electricity generation systems, with space allocated for future installation of energy storage systems (such as batteries).
- Submetering and monitoring of major energy uses.

Water

A NABERS Water rating for “warehouses and cold stores” is not possible (i.e. there is no option to complete this assessment for this building type). Furthermore, a NABERS Commitment Agreement is a pathway that is exclusively available for NABERS Energy Ratings.

We are committed to ensuring a suitable standard of water use for the development equivalent to a 3-star NABERS Water rating for a commercial premises. Nevertheless, we do not deem NABERS Water to be a suitable avenue for a project of this nature.

Analysis has been conducted to understand the extent of water consumption mandated by this benchmark, as delineated in the summary below and the NABERS reverse calculator presented in Appendix B.

Total maximum annual water consumption	1,291 kL
Total NLA of office space within the building *	2,154m²
Total hours per week the offices are occupied (levels of 20% or more) *	50 hours

** The input total NLA and total hours per week are best known estimates at this stage. The maximum annual electricity will vary should NLA and/or hours change.*

Our analysis encompassed a comprehensive understanding of the key initiatives incorporated by the Applicant, and we are confident in the project’s ability to attain the benchmark. The proposed initiatives to reduce potable water consumption are as follows:

- Highly water efficient fittings, fixtures and appliances.
- Fire protection system designed as a closed loop system with water recirculation during testing.
- Office air conditioning systems including waterless heat rejection.
- Landscaping to primarily include native and drought tolerant species.
- Submetering and monitoring of major water uses and sources, connected to the BMS to identify leaks.
- Harvest and reuse rainwater for non-potable uses. Uses to be determined based on a detailed water balance in the next design stage.

Summary

While dedicated to achieving an equivalent 5.5-star base building NABERS Office Energy rating and 3-star NABERS water rating for the development, we deem it premature to sign a formal Commitment Agreement at present. We propose that the Department accepts our commitment to meet a standard on energy and water use for the ancillary office areas that is equivalent, respectively, to the 5.5-star NABERS energy rating and 3-star NABERS water rating for a commercial premises, without the Applicant being required to formalise a NABERS Commitment Agreement at this time.

It is our intention to enter into a NABERS Commitment Agreement (CA) at a future date. However, prior to the signing of a NABERS CA, two items have been identified which will require clarification with the NABERS National administrator (NSW Government). We have submitted inquiries to NABERS regarding each of the items identified below:

1. Given the significant proportion of non-Class 5 (Office) areas, it remains uncertain under the NABERS document "NABERS Energy and Water for Offices Rules v5.1" whether the ancillary office spaces would satisfy the necessary eligibility criteria for an Office rating.
2. Section 3.2.3 Multiple building versus single building ratings of the NABERS Rules document outlines various features that may warrant multiple NABERS ratings, potentially necessitating multiple Commitment Agreements (CA). Although, a single rating may suffice, agreement from the National Administrator is required.

Yours sincerely
For and on behalf of
Cundall Johnston and Partners Pty Ltd



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Rating details

What type of rating would you like to estimate?

Energy

Water

What type of building?

Office

Hotel

Shopping centre

Data centre

Residential aged care and retirement living

Apartment building

What is the postcode of the building?

2168

What is the scope of your rating?

Base building

Whole building

Tenancy

Enter the star rating you wish to achieve

5.5

Stars (Energy)

Building details

What is the floor space of the building?

Enter the total net lettable area of office space within the building.

2154

m²

How many hours per week is the building occupied?

Use the standard business hours of the building.

 hours

Energy use

What is the Percentage of Electricity in the total Energy Consumption?

Enter the percentage of office energy use that will be met through electricity.

 %

What is the Percentage of Gas in the total Energy Consumption?

Enter the percentage of office energy use that will be met through gas.

 %

What is the Percentage of Diesel in the total Energy Consumption?

Enter the percentage of office energy use that will be met through diesel.

 %

Results

Benchmarking factor at 5.5 stars NABERS Energy:	NaN
Maximum Benchmarking Emissions at 5.5 Stars NABERS Energy:	120,330.6 kgCO ² -e/year
Benchmarking Emissions Intensity at 5.5 Stars NABERS Energy:	55.864 kgCO ² -e/m ² .year
Energy Intensity at 5.5 Stars NABERS Energy:	223 MJ/m ² .year
Reporting Emissions for this office – Scope 1, 2 and 3:	105,623 kgCO ² -e/year
Reporting Emissions for this office – Scope 1 and 2:	97,601 kgCO ² -e/year
Maximum Allowable Energy Consumption:	
Target Max Electricity:	133,700 kWh per annum
Target Max Gas:	0 MJ per annum
Target Max Diesel:	0 L per annum

Rating details

What type of rating would you like to estimate?

- Energy
- Water

What type of building?

- Office
- Hotel
- Shopping centre
- Residential aged care and retirement living
- Apartment building

What is the postcode of the building?

2178

What is the scope of your rating?

- Whole building

Enter the star rating you wish to achieve

3 Stars (Water)

Building details

What is the floor space of the building?

Enter the total net lettable area of office space within the building.

2154 m²

How many hours per week is the building occupied?

Hours each week with occupancy levels of 20% or more (hrs/week).

hours

Results

Maximum Water Consumption at 3 Star NABERS Water:	1,291 kL/year
Water Intensity at 3 Star NABERS Water:	0.6 kL/m ² .year