



Department of Planning Housing and Infrastructure

Locked Bag 5022
Paramatta
NSW 2124

February 17, 2026

To whom it may concern,

Ref: SSD-82052708

Project Mars Data Centre (12 Mars Road, Lane Cove West)

Nabers Commitment Agreement Energy and Water

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 for the commercial office premises.

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. It should however be noted under the NABERS definition, this project would likely be determined as a “Data Centre”.

This report also has been prepared to respond to the SEARs requirement issued below:

Table 1

SEARs Items	Secretary’s Environmental Assessment Requirements	Section Reference (This Letter)
Ecologically Sustainable Development (ESD)	If Chapter 3 of SEPP (Sustainable Buildings) 2022 applies: <ul style="list-style-type: none">o demonstrate how the development has been designed to enable the general sustainability provisions, as defined in Chapter 3.2(1).	Energy Section

hdrinc.com/au

Level 24, 25 Martin Place, Sydney NSW 2000
T +61 2 9956 2666 W hdrinc.com.au
HDR Pty Ltd trading as HDR ABN 76 158 075 220



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

Total maximum annual electricity usage of the office space within the building	106,936 kWh
Total NLA of office space within the building*	1,686 m ²
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 has allowed for a comprehensive review of the key initiatives incorporated by the Applicant, and we are confident in the project's ability to attain the benchmark.

Water

A NABERS Water rating for "Data Centre" 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 the commercial office premises. However, 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 targeted by this benchmark, as shown in the summary below and the NABERS reverse calculator presented in Appendix.

Total maximum annual water consumption of the office space within the building	1,722 kL
Total NLA of office space within the building*	1,686 m ²
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 water consumption will vary should NLA and/or hours change.*

Our analysis has allowed for a comprehensive understanding of the key initiatives incorporated by the Applicant, and we are confident in the project's ability to attain the benchmark.

Summary

While dedicated to achieving an equivalent 5.5-star base building NABERS Office Energy rating and 3-star NABERS water rating for the commercial office premises, we deem it premature to sign a formal NABERS



Commitment Agreement at present. We propose that the Department accepts our commitment to meeting energy and water use standards for the ancillary office areas that are equivalent to the 5.5-star NABERS Energy rating and 3-star NABERS Water rating for commercial office premises, without requiring the Applicant to formalise a NABERS Commitment Agreement at this time.

We have currently submitted a NABERS Agreement to Rate to satisfy the SEPP compliance requirement. However, it is our intention to formalise this by entering into a NABERS Commitment Agreement (CA) at a later stage.

Sincerely,

A handwritten signature in cursive script that reads "James Cullimore".

James Cullimore
Associate Director

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?

2066

What is the scope of your rating?

- Base building
- Whole building
- Tenancy

Enter the star rating you wish to achieve

Note: the reverse calculator uses the rating progress metric to provide targets of 0.1 star increments, but NABERS only certifies 0.5 star increments from 1 to 6.

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.

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:	74,855.4 kgCO ² -e/year
--	------------------------------------

Benchmarking Emissions Intensity at 5.5 Stars NABERS Energy:	44.398 kgCO ² -e/m ² .year
--	--

Energy Intensity at 5.5 Stars NABERS Energy:	228 MJ/m ² .year
--	-----------------------------

Reporting Emissions for this office – Scope 1, 2 and 3:	74,855 kgCO ² -e/year
---	----------------------------------

Reporting Emissions for this office – Scope 1 and 2:	70,577 kgCO ² -e/year
--	----------------------------------

Maximum Allowable Energy Consumption:

Target Max Electricity:	106,936 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?

What is the scope of your rating?

- Whole building

Enter the star rating you wish to achieve

Note: the reverse calculator uses the rating progress metric to provide targets of 0.1 star increments, but NABERS only certifies 0.5 star increments from 1 to 6.

 Stars (Water)

Building details

What is the floor space of the building?

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

 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:	1,722 kL/year
Water Intensity at 3 Star NABERS Water:	1.022 kL/m ² .year