

## **Mcdonald, Paul M.**

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**From:** Nikolai, Jeane  
**Sent:** 11 May 2023 14:14  
**To:** Mcdonald, Paul M.  
**Subject:** Southampton Princess SDO

**Importance:** High

Good afternoon, Paul-

Thank you for the opportunity to weigh in on the Southampton Princess SDO from an energy perspective.

While I can appreciate the evaluation provided, there are concerns that the proposal does not properly consider measures to reduce energy consumption or incorporate renewable energy systems, which is a requirement under the International Energy Conservation Code overlay to the existing building. I would also note that this application comes at a time when building codes are being reviewed, and are likely to see substantial changes in requirements for both commercial and residential developments in respect to energy matters, and by the time this project is in the permitting phase, those codes may be in place- therefore it is necessary and prudent to consider all elements of energy at this initial stage.

Point by point:

6.8.1 There is, in fact, clear policy and guidelines governing energy use and design for that contained in the IECC overlay. That must be taken into consideration even at this stage, as the deployment of solar PV, solar thermal and fenestration guidelines will certainly have an effect in respect of Planning. If conservation and efficiency matters are not considered even at this early stage, we are concerned that they will remain unaddressed, which would be a missed opportunity. The developer should be considering these matters at this stage, and indeed throughout the project, to ensure efficient operations as the project is executed. This will save the hotel a great deal in operating costs, and can only make the villas and residential units more attractive to prospective buyers given our high energy costs.

6.8.2 There is still no indication that BELCO has been consulted. Whilst we appreciate the rigor applied in the following sections, there is still no discernable evidence of consultation with the utility. Our concern is the unforeseen costs should major upgrades be precipitated by this development.

6.8.3 Paragraph 5- "However, there is currently no regulatory requirement for developers to install renewable energy." While this may be true in respect to regulations, it is short sighted and does not address the seriousness of the energy situation. With the advent of mass adoption of EVs, and the likelihood of more being used particularly by this caliber of clientele, we strongly suggest that the conduit and capacity is installed to best 'future-proof' the development and allow for the eventuality of EVs. It seems that there should be some quid pro quo in that if this scale of development is permitted, then the developer should be making every possible effort to ensure the sustainability of the project. Furthermore, it should be noted that this should not be seen as an onerous burden to the project but rather an enhancement that is more likely to increase the attraction and value of the units.

Paragraph 7- We find it curious that a CHP plant, if genuinely being contemplated, is not noted in the drawings. This would surely be a Planning consideration, and as such, if the developer is sincere about this potential, then it must be included at this stage of the project.

6.8.4.2 While it may be that, under the criteria presented, that the new SDO foretells a 'negligible' impact from the 2009 SDO, we do not agree, particularly on the backdrop of no apparent consultations having been held with the

utility. If the developer can rely on conditions having changed significantly since 2009 in respect to business plans, then it is analogous that conditions regarding the utility's infrastructure may also have changed significantly since then; other development has moved on in adjacent areas and so the current condition must be taken into consideration, and at that, beyond the generation capacity of the utility.

6.8.6 The EIS acknowledges the unknown to which we refer in its closing sentence: *"The scale of these impacts is difficult to ascertain without more available information on the other developments."* Given this, we would assert again that every effort must be made to address energy conservation and efficiency, as well as renewable energy, at this stage of the application.

6.8.7 Some of those mitigation measures will have Planning impacts, and if the developer is being genuine in their desire to implement RE and EE, then it needs to be addressed now.

6.8.11 The 'Do Nothing' option and the baseline should not be the 2009 SDO, the baseline must be the *current* conditions, not just on site but also with regard to the current loads and state of the utility.

Please let me know if you need anything else at all regarding this application.

Kind regards,

Jeane



**Jeane Nikolai**

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