

ELECTRIC VEHICLE CHARGING STATEMENT

2024/62/91828/W

Date: April 2025

Ref: 2024/7846/TN01

1 INTRODUCTION

Context

- 1.1 RGP is instructed to provide highways and transport input to approved development at Premier Inn Huddersfield Central, St Andrew's Road, Aspley, Huddersfield, HD1 6SB ("the site").

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- 1.2 Planning application (reference. **2024/62/91828/W**) was submitted to Kirklees Council for:

"Demolition of existing hotel restaurant and erection of additional hotel bedrooms with breakfast room and alterations to the car park and associated works."

- 1.3 The application was approved in January 2025 with this Electric Vehicle Charging Statement prepared with consideration to Condition Seven of the Decision Notice which states that:

"Prior to development commencing on the superstructure of the development hereby approved, a scheme detailing the dedicated facilities to be provided for charging electric vehicles and other ultra-low emission vehicles shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall meet at least the following minimum standard for numbers and power output:

- One Standard Electric Vehicle Charging Point (of a minimum output of 16A/3.5kW) for every 10 parking spaces.
- Parking spaces that are to be provided with charging points shall not be brought into use until the charging points are installed and operational. The charging points installed shall be retained thereafter.

Reason: To ensure users of and visitors to the development are encouraged to use lower-carbon and more sustainable forms of transport and to mitigate the air quality impacts of the development in accordance with policies LP20, LP24, LP47, LP51 and LP52 of the Kirklees Local Plan, chapters 9 and 15 of the National Planning Policy Framework, and the West Yorkshire Low Emissions Strategy."

Whitbread

- 1.4 This Statement sets out Whitbread's position with regard to the implementation of Electric Vehicle Charging Points (EVCPs) across their UK estate in connection with their Accelerated Growth Programme (AGP).
- 1.5 Whitbread are presently expanding their hotel room offering at Premier Inns throughout the UK and rationalising their restaurant estate, albeit, at many sites, restaurants will be retained. As part of Whitbread's AGP, new hotel rooms are being secured through the planning application process.
- 1.6 Whitbread recognise the importance of providing EVCP infrastructure for their hotel guests and restaurant diners. As part of their estate wide strategy, EVCP infrastructure is being procured centrally and rolled out where appropriate in the UK in partnership with Equans. Further details on Whitbread's partnership with Equans is available from the following link: <https://www.equans.co.uk/case-studies/whitbread>.
- 1.7 This Statement therefore sets out the reasoning as to why as part of Whitbread's AGP, it is not appropriate to provide EVCPs under Building Regulations (Approved Document S: Infrastructure for the charging of electric vehicles) and the practicalities of providing EVCPs on sites in connection with individual planning permissions in the context of Whitbread's estate wide EVCP strategy and procurement process.

2 APPROVED DOCUMENT S

- 2.1 In review of 'Approved Document S: Infrastructure for the charging of electric vehicles' it is considered the hotel extension is not within the defined categories of development as detailed in Part S of the Building Regulations.
- 2.2 The hotel is not classified as residential and does not meet the criteria of 'Requirement S4: New buildings other than residential or mixed-use buildings' as it is an extension to an existing building, not a new building.
- 2.3 Furthermore, the extension does not meet the criteria of 'Requirement S5: Buildings other than residential buildings undergoing major renovation work' as it is not considered the extension is a '*major renovation*' as per the Regulation's definition, as less than 25% of the existing buildings envelope would be effected / renovated as a result of the extension.
- 2.4 Therefore, while the provisions of Approved Document S are acknowledged, it is not considered it applies to this planning application.

3 PRACTICALITIES OF PROVIDING EVCPs

3.1 Consideration must be given to the practicalities of providing EVCPs on sites in connection with individual planning permissions:

- All AGP targeted sites are existing operational sites, whereby the hotel extension and parking requirements would be accommodated within existing car parking areas where space exists.
- The installation of EVCPs would impact the existing sites power supply and could therefore require a new National Grid connection and / or substation, particularly where existing power supply limits are close to capacity. Power supply considerations therefore need to be centrally coordinated as part of Whitbread's EVCP strategy and procurement process.
- The installation of EVCPs in connection with individual planning permissions would have a significant disproportionate cost implication to Whitbread in terms of it being outside the scope of their existing estate wide EVCP strategy and procurement process.

4 WHITBREAD EVCP STRATEGY AND PROCUREMENT PROCESS

4.1 Whitbread are committed to sustainable development practices across their operations. In 2022, Whitbread gained SBTi validation for their overall net zero targets and published their 'Transition Plan to Net Zero'.

4.2 Whitbread are partnered with Equans to install charging points across the Whitbread estate. Therefore, while the provision of charging points is an important consideration, the current hotel extension prioritises immediate operational need. The provision of EVCPs is therefore being strategically coordinated across the Whitbread estate UK wide.

4.3 Whitbread will continue to explore opportunities for the installation of charging points once the extension works are complete – this could include retrofitting charging points as part of any future development, to ensure the site remains adaptable and responsive to the demand for any such infrastructure and future policy requirements.

5 SUMMARY

5.1 This Statement sets out Whitbread's position with regards to the implementation of EVCPs across their UK estate in connection with their AGP.

5.2 It is demonstrated that Whitbread are committed to sustainable development practices across their operations, however, and for the reasons outlined as above, it is not considered appropriate to provide EVCPs in connection with individual planning permissions with priority given to Whitbread's EVCP strategy roll out across the UK.