

WHITBREAD'S ELECTRIC VEHICLE CHARGING STATEMENT

Date: February 2025

1 INTRODUCTION

- 1.1 This Electric Vehicle Charging Statement is prepared by RGP Consulting Engineers Limited on behalf of Whitbread Group Plc. who operate Premier Inn hotels and associated branded restaurant sites across the United Kingdom (UK).

Context

- 1.2 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).
- 1.3 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.
- 1.4 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>.
- 1.5 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 (i.e. the developments do not involve additional car parking).
 - The installation of EVCPs would therefore require the excavation of a significant proportion of an existing car park, that is, the car park is not new and is not in connection with a new development.
 - 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.