



North Norfolk Local Plan

HEARING STATEMENT

**Matter 9 – Delivering Climate Resilient Sustainable
Growth – Policy CC8 Electric Vehicle Charging**

**Prepared by: John Long Planning Ltd for
The Blakeney Hotel**

2 January 2023



Table of Contents

1	INTRODUCTION	1
2	RESPONSE TO INSPECTOR’S ISSUES	2
	Matter 9 – Delivering Climate Resilient Sustainable Growth – Policy CC8 Electric Vehicle Charging - Does Policy CC8 provide appropriate guidance for the provision of electric vehicle charging points in new development? Are the proposed standards justified, how do they relate to the building regulations and what are the implications for the cost of development?	2
3	SUGGESTED CHANGE	3

1 Introduction

- 1.1 This hearing Statement has been prepared by John Long Planning Ltd, on behalf of the Blakeney Hotel. It relates to representations submitted on behalf of the Estate to the NNDC Local Plan (pre-submission version). The Statement provides information and responses to the Inspector's Matters, Issues and Questions For examination published in November 2023. The Blakeney Hotel is an iconic building in Blakeney and one of the district's major employers.
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2 Response to Inspector's Issues

Matter 9 – Delivering Climate Resilient Sustainable Growth – Policy CC8 Electric Vehicle Charging - Does Policy CC8 provide appropriate guidance for the provision of electric vehicle charging points in new development? Are the proposed standards justified, how do they relate to the building regulations and what are the implications for the cost of development?

- 2.1 The Plan (Policy CC8) requires that proposals for hotels will need to include electric vehicle charging points for a minimum of 30% of all new parking spaces. Blakeney Hotel assume that this requirement is intended to apply to proposals for extended/additional parking provision at Hotels.
 - 2.2 The Hotel notes that the Local Plan policy requirement goes beyond Building Regulations 2010 (Approved Document S) EV requirements. The Building Regulations require that where any non-residential building is proposed/being renovated with over 10 parking spaces, that 1 of the spaces should include an EV charge point; with cable routes for 20% of the total number of remaining parking spaces.
 - 2.3 If the Local Plan Policy's intentions is to go beyond current Building Regulation requirements and seek to apply a minimum 30% of all new parking spaces to include electric vehicle charging points on hotel car park extension proposals, Blakeney Hotel has concerns over the potential costs that would be incurred in providing the capacity in the electricity supply and distribution network needed to provide additional minimum 30% electric vehicle charging points.
 - 2.4 Blakeney Hotel understands that to provide the necessary capacity in the local (Blakeney) electricity network to enable additional EV charging at the Hotel and other potential developments in and around the village would require considerable upgrades and reinforcement to the wider electricity supply and distribution network, as well as the Hotel's own electricity infrastructure.
 - 2.5 If this is the case, Blakeney Hotel would be keen to see the District Council's plans for seeking improvements to the area's electricity supply and distribution network; and measures/interventions that it may have at its disposal to encourage/require UK Power Network to accelerate its plans for upgrades to the network serving North Norfolk and Blakeney.
 - 2.6 Blakeney Hotel are concerned that the costs of upgrading the Hotel's electricity infrastructure may even be prohibitive, let alone the cost of upgrades to the wider electricity supply and distribution network to support EV charging and would have the potential to add a further financial burden to the Hotel's operation, which could impact on the Hotel's ability to remain competitive; or prejudice the ability to deliver a car park extension.
 - 2.7 Blakeney Hotel consider that the Plan (Policy CC8) is not sound and is defective because it is not justified and fails to take into account technical feasibility and financial viability of installing electric vehicle charging facilities.
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- 2.8 Blakeney Hotel considers that the Plan (Policy CC8) can be made sound by allowing technical feasibility and financial viability to be considered in determining the amount of electric vehicle charging points to be provided. This will mean that proposals for car park extensions can still come forward without incurring prohibitive costs.

3 Suggested Change

- 3.1 Blakeney Hotel requests that Policy CC8 Section 4 is amended to only require the provision of electric vehicle charging points where it is technically feasible and financially viable to do so, taking into account the cost of electricity infrastructure reinforcement and upgrades necessary:

*“4. Proposals for hotels (use class C1) will include active ⁽¹⁾ provision for electric vehicle charging points of a minimum of 30% of all new parking spaces, **subject to technical feasibility and financial viability.**”*

- 3.2 Blakeney Hotel suggest that the policy’s justification could include text to confirm that where it is not technically feasible or financially viable to provide a minimum of 30% of all new parking space to include electric vehicle charge points, that an amount/percentage will be agreed with the Local Planning Authority, subject to a consideration of evidence of technical feasibility and costs.