

## Alternative Means of Compliance (AMOC) Submission

CRITERION  
HOSPITALITY



**Hostel Name: Zedwell Hotel and Pod Hotel**

**Location: 109, 110, 111, 112 Princes Street & 144 - 150 Rose Street Edinburgh EH2 3AA**

**Date first submitted: 16<sup>th</sup> June 2025**

**Revision – P03 2<sup>nd</sup> April 2026**

**Reference: 24/03504/WARR**

### **Update.**

A response to our initial submission was received on 04.09.25 from CEC Building Standards.

Further information was requested as noted –

- Evidence-based analysis of usage parameters, peak usage times, and demographic variations in facility use – **See Washroom Capacity Assessment from operator.**
- Additional WHB provision to be considered – **Additional provision now included. See revised ratios for information.**
- Peak demand periods need to be assessed against capacity – **Refer to survey assessment.**
- Full designed occupancy should be assessed for compliance – **100% occupancy now used to assess provision.**

The following report has been updated with revised information following our review and assessment of the comments received. We have also reduced the report to only cover the non-compliances, all other ratios comply with the NDTH.

### **1. Introduction**

This document outlines an Alternative Means of Compliance (AMOC) submission regarding the provision of communal WC and shower facilities at the proposed Zedwell Hotel.

This submission is made under Section 3.12 of the Scottish Building Standards, requesting a **modification to the standard relating to sanitary accommodation** in a hostel environment. Due to the nature of the client's hostel concept and operation together with the targeted occupancy levels, full compliance is not required to service the larger pod hotel dormitory areas at basement and first mezzanine levels. This is based on statistics gleaned from their current hostel operations in the UK, together with the inherent knowledge of their target guest sector. However we have taken into account feedback received from Building Standards and have revised proposals to better align with the recommendations.

We propose alternative arrangements that ensure the functionality, hygiene, and comfort of occupants are maintained to an acceptable level and the operator accepts that provision would be increased at a later date should their intended guest profile or occupancy rates change in the future. We respectfully submit the following for consideration.

## 2. Building Standards Requirement - Revised

The relevant standard for sanitary facilities in hostels is derived from the Technical Handbook for Non-Domestic Buildings, Section 3.12.3 – Table 3.6, which sets out the required ratio of sanitary facilities based on occupancy numbers.

Below is a comparative table detailing the required provision, our actual provision, and justification for the alternative approach at basement and first mezzanine levels. Ground and first floor dormitories have compliant sanitary provision:

| Floor Level | Facility Type | Required Standard (per NDTH Table 3.6) | Actual Provision                             | Justification for Alternative Means of Compliance                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------|---------------|----------------------------------------|----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Basement    | WCs           | 1 WC per 9 persons                     | 1 WC per 8.7 persons                         | COMPLIANT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|             | Showers       | 1 Shower per 4 persons                 | 1 Shower per 5.3 persons<br>(Previously 1:8) | <p>Additional showers have been added and pod capsule numbers have been reduced at this level to balance the provision of sanitary facilities.</p> <p>The operator has confirmed from experience of their currently operating 1000 pod hotel in Picadilly, London that the smaller dormitories tend to house groups and as such compliant sanitary provision is best suited as the groups generally all require facilities at the same time. The larger dormitories house mixed groups with differing arrival patterns and reasons for their stay. As such peak demands are reduced as guests use facilities throughout the day / night.</p> <p>The basement and first floor mezzanine contain the largest dormitories in the building and as such have a slightly reduced ratio from the recommendations in the NDTH.</p> <p>The operator is in control of locating guests on a floor level best suited to their needs. Large groups for example would be sited in the single-sex</p> |

|                        |         |                        |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------------|---------|------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                        |         |                        |                                                     | dormitories on ground and first floors which have compliant numbers of WCs and showers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|                        | WHB     | 1 Basin per 4 persons  | 1 Basin per 3.9 persons<br><br>(Previously 1 per 9) | COMPLIANT<br>Additional WHBs have been allowed for to increase the ratio.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>First Mezzanine</b> | WCs     | 1 WC per 9 persons     | 1 WC per 9 persons                                  | COMPLIANT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                        | Showers | 1 Shower per 4 persons | 1 Shower per 5.5 persons                            | As this level houses a larger dormitory area it is intended, to group guests from domestic and international short-stay markets with no school or large groups and therefore access to the sanitary accommodation will be spread throughout the day / night rather than a more 'typical' hotel with shared sanitary use 'peaks'. The operator is in control of locating guests on a floor level best suited to their needs. Large groups for example would be sited in the single-sex dormitories on ground and first floors which have compliant numbers of WCs and showers. |
|                        | WHB     | 1 Basin per 4 persons  | 1 Basin per 5.5 persons<br><br>(Previously 1 per 9) | Additional WHBs have been allowed for to increase the ratio.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

#### Summary of Proposed Provision -

| Level                  | Sleeping Pods | No. of WCs | No. of Showers | No. of WHBs |
|------------------------|---------------|------------|----------------|-------------|
| <b>Basement</b>        | 148           | 17         | 28             | 38          |
| <b>Ground</b>          | 34            | 4          | 9              | 8           |
| <b>First</b>           | 42            | 5          | 10             | 10          |
| <b>First Mezzanine</b> | 72            | 8          | 13             | 13          |
| <b>TOTAL</b>           | 296           | 34         | 60             | 69          |

### 3. Mitigation Measures

The appended Washroom Capacity Assessment concludes that the Edinburgh facilities will remain

comfortably below use saturation at full occupancy on each level and as such mitigation measures are not predicted to be required. However the inclusion of the below will allow flexibility for the future –

To ensure future guest comfort and compliance with hygiene expectations, the following will be implemented:

- **Layout:** The sanitary facilities are designed to have a simple and legible layout on each level with clear visibility of the activity zones and circulation spaces. Linear layouts of the showers, WCs, wash troughs and communal benching allows users to move efficiently through the space, mitigating any overcrowding. Enlarged WC cubicles are provided in each sanitary facility to cater for guests who may require additional space.
- **Guest Usage Management:** The operator is in control of occupancy rates and will monitor these to ensure the optimal capacity to demand rate is met.
- **Water-efficient Fixtures:** The use of quick-flush toilets and sensor taps will improve turnaround times within sanitary facilities as well as aid in sustainable water use. Shower operation to non-accessible facilities will be by push-button, timed flow which again will encourage responsible water use and turnaround time. Hand dryer provision will be the fast-drying type to speed up the process and avoid queuing.
- **Sustainable approach to supply for demand:** With sustainability at the core of the building's development approach, the client and operator endorse supplying for demand rather than over-supplying (which encourages inefficient use of spaces and water). The operator's data and usage-based evidence supports the reduction in facilities proposed and should guest usage patterns / demographics change over time, they commit to extending the sanitary facilities as required to suit the specific needs of their guest market.

#### 4. Supporting Information

- **Supporting survey evidence from hotel operator**

#### 5. Conclusion

Whilst the Zedwell Hotel and Pod Hotel on Princes Street does not fully meet the prescriptive requirements for shower provision at the basement and shower and wash hand basin provision at first floor mezzanine level, we have reduced pod capsule numbers and added additional appliances to better the previous ratios and to align with evidence gained from the operator's other 1000 bed pod hotel. The results of the washroom capacity assessment carried out during the busiest period at the Piccadilly pod capsule hotel provides evidence that even at 100% occupancy the washrooms will provide sufficient appliances to avoid overcrowding and queuing.

We believe these measures provide an appropriate level of compliance with the intent of the Scottish Building Standards together with the intended guest type and occupancy, and request approval for this Alternative Means of Compliance.

Submitted on behalf of Criterion Capital by CDA