

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: 16th June 2025

Reference: 24/03504/WARR

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 pod hotel areas. This is based on statistics gleaned from their current hostel operations in the UK, together with the inherent knowledge of their target guest sector.

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

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:

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 9 persons	COMPLIANT

	Showers	1 Shower per 4 persons	1 Shower per 8 persons	Based on a typical 80% occupancy of the basement dormitory pods, the anticipated number of total persons will be – 149 people. Based on this occupancy, the ratio of showers to people increases to 1:6.7. Areas of non-compliance only occur on basement and first mezzanine levels where 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. The operator will put into place, increased cleaning schedules to maintain hygiene standards and the incorporation of communal benching encourages changing out with the shower cubicle themselves, freeing up shower facilities at a quicker rate. Usage patterns monitored in other hostels under same operation and management show no queuing or user dissatisfaction with similar ratios and based on occupancy turnover and average use, the proposed provision meets the anticipated demand.
	WHB	1 Basin per 4 persons	1 Basin per 9 persons (1 WHB per WC)	The inclusion of vanity areas 'frees up' basin space for hand/washing and allows a quicker turnover of guests using the basins. As such it is proposed that the number of wash hand basins match the number of proposed compliant WC numbers in line with the operator's anticipated use and demand.

				Similar to the shower provision, based on a typical 80% occupancy of the basement dormitory pods, the anticipated number of total persons will be – 149 people. With this occupancy, the ratio of WHBs to people increases to 1:7. The proposed basins will be in a continuous trough form which is proven to reduce queuing through its spatial flexibility over more traditional individual sinks. Together with the anticipated low simultaneous demand (based on the guest demographic that will be sited in the basement and first mezzanine areas), supports that the proposed ratio of wash hand basins is sufficient.
Ground Floor	WCs	1 WC per 9 persons	1 WC per 9 persons	COMPLIANT
	Showers	1 Shower per 4 persons	1 Shower per 4 persons	COMPLIANT
	WHB	1 Basin per 4 persons	1 Basin per 9 persons (1 WHB per WC)	The inclusion of a vanity area ‘frees up’ basin space for hand/washing and allows a quicker turnover of guests using the basins. As such it is proposed that the number of wash hand basins match the number of proposed compliant WC numbers in line with the operator’s anticipated use and demand. Similar to the shower provision, based on a typical 80% occupancy of the ground floor dormitory pods, the anticipated number of total persons will be – 27 people. With this occupancy, the ratio of WHBs to people increases to 1:7. The proposed basins will be in a continuous trough form which is proven to reduce queuing through its spatial flexibility over more traditional individual sinks.

				The operator supports that the proposed ratio of wash hand basins is sufficient.
	Accessible Shower Room		1 Accessible shower room accessed directly off accessible dormitory	COMPLIANT At this level the separate fully accessible dormitory has its own fully accessible WC and shower room accessed directly off the dormitory space in line with the NDTH standards.
First Floor	WCs	1 WC per 9 persons	1 WC per 9 persons	COMPLIANT
	Showers	1 Shower per 4 persons	1 Shower per 4 persons	COMPLIANT
	WHB	1 Basin per 4 persons	1 Basin per 9 persons (1 WHB per WC)	The inclusion of a vanity area ‘frees up’ basin space for hand/washing and allows a quicker turnover of guests using the basins. As such it is proposed that the number of wash hand basins match the number of proposed compliant WC numbers in line with the operator’s anticipated use and demand. Similar to the shower provision, based on a typical 80% occupancy of the first floor dormitory pods, the anticipated number of total persons will be – 35 people. With this occupancy, the ratio of WHBs to people increases to 1:7. The proposed basins will be in a continuous trough form which is proven to reduce queuing through its spatial flexibility over more traditional individual sinks. The operator supports that the proposed ratio of wash hand basins is sufficient.
First Mezzanine	WCs	1 WC per 9 persons	1 WC per 9 persons	COMPLIANT

	Showers	1 Shower per 4 persons	1 Shower per 5.5 persons	Based on a typical 80% occupancy of the first mezzanine dormitory pods, the anticipated number of total persons will be – 58 people. Based on this occupancy, the ratio of showers to people increases to 1:4 which is compliant with Section 3.12.3. It is intended, at this level, 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. The operator will put into place, increased cleaning schedules to maintain hygiene standards and the incorporation of communal benching encourages changing out with the shower cubicle themselves, freeing up shower facilities at a quicker rate. Usage patterns monitored in other hostels under same operation and management show no queuing or user dissatisfaction with similar ratios and based on occupancy turnover and average use, the proposed provision meets the anticipated demand.
	WHB	1 Basin per 4 persons	1 Basin per 7 persons	The inclusion of a vanity area and separate beauty room 'frees up' basin space for hand/washing and allows a quicker turnover of guests using the basins. As such it is proposed that the number of wash hand basins match the number of proposed compliant WC numbers in line with the

				operator's anticipated use and demand. Similar to the shower provision, based on a typical 80% occupancy of the first mezzanine dormitory pods, the anticipated number of total persons will be – 58 people. With this occupancy, the ratio of WHBs to people increases to 1:6. The proposed basins will be in a continuous trough form which is proven to reduce queuing through its spatial flexibility over more traditional individual sinks. The operator supports that the proposed ratio of wash hand basins is sufficient.
Staff Area	WCs	Over 25 staff = 2 WCs + 1 WC for every additional 25 persons	55 staff = 4 WCs. 3 provided plus 1 accessible	COMPLIANT 55 maximum total staff numbers confirmed by client / operator.
	Showers	Not a statutory requirement	4 showers plus 1 accessible	Not applicable.
	WHB	Over 25 staff = 2 WHBs + 1 WHB for every additional 25 persons	55 staff = 4 WHBs. 3 provided plus 1 accessible	COMPLIANT
	Accessible Shower Room	Included within WC ratio above	1 accessible WC and shower room	COMPLIANT

Summary of Proposed Provision -

Level	Sleeping Pods	No. of WCs	No. of Showers	No. of WHBs
Basement	186	21	22	21
Ground	34	4	9	4
First	44	5	11	5
First Mezzanine	72	8	13	10

3. Mitigation Measures

To address the areas of reduced facilities noted within the table above, and to ensure 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 and shower cubicles are provided in each sanitary facility to cater for guests who may require additional space.
- **Enhanced Cleaning Regime:** Increased cleaning frequency to mitigate the impact of higher usage. The use of durable and easy-to-clean surfaces and sanitaryware will reduce the time taken to clean the facilities.
- **Guest Usage Management:** Encouraging staggered use during peak hours via signage and advisory notices. The implementation of a 'booking' system could be incorporated during periods of higher occupancy to manage time slots for the communal sanitary facilities and to prevent any overcrowding. 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

- General Arrangement Plans of each dormitory level
- Sanitary facility layout plans for each dormitory level
- Supporting statement from hotel operator

5. Conclusion

Whilst the Zedwell Hotel and Pod Hotel on Princes Street does not fully meet the prescriptive requirements for wash hand basin and shower provision, we have put in place effective alternative measures to maintain hygiene, functionality, and guest satisfaction. 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