

Keith Clark

From: Keith Clark
Sent: 24 September 2025 11:37
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: 24/03504/WARR - 109 Princes Street, Edinburgh

Categories: Egress Switch: Unprotected

Hi [REDACTED]

Further to our call this morning in relation to the pod style sleeping accommodation I am aware of properties within both Edinburgh and Glasgow with similar style accommodation however they appear to have developed from glorified bunkbeds and rightly or wrongly, likely to have been treated as furniture.

When considering the pods within this proposal due to their scale, permanence, and integration into the fabric of the building, we would consider these pods to be fixtures rather than furniture. Accordingly, they must be assessed in the context of building standards relating to occupant safety and means of escape.

Unfortunately, current legislation does not concisely address such proposals, however when considering an occupants escape from the proposed pods in comparison to the escape from a room the guidance makes the following observations.

Section 2.9.12

“In residential buildings, occupants are particularly vulnerable to fire when asleep. Occupants may also be unfamiliar with their accommodation and escape routes. Those occupants on the fire floor should be provided with the opportunity to reach a protected zone (or other escape route) in relative safety and as quickly as possible; therefore, the movement of fire and smoke to the escape route should be inhibited.

In a residential building, where any corridor escape route serves sleeping accommodation, it should be constructed of walls providing a short fire resistance duration, and any door in the wall should be a suitable self-closing fire door with a short fire resistance duration.”

Section 2.1.5

“In a residential building, every upper storey should form a separate compartment.”

From the guidance provided it could be interpreted that the pods should be provided with a horizontal separation with a medium fire resistance, together with a short fire resistance between the pods and the central isle/corridor and any opening being provided with a self-closing fire door with a short fire resistance duration.

However, the guidance allows a proposal to demonstrate compliance in a different manner by taking an alternative approach such as a fire engineered solution which draws guidance from the Technical Handbook together with the following concerns.

Similar types of accommodation have suffered fatalities because of fire, and such tragedies underscore the need for caution and robust fire safety standards. The following risk factors highlight some areas of concern which should be considered in any assessment of pod-style accommodation:

1. **Flammable materials** – Certain materials may accelerate the spread of fire.
2. **High occupancy density** – A concentration of individuals in a small area can complicate evacuation.
3. **Delayed evacuation** – Occupants may be disoriented and quickly overcome by smoke or toxic gases.
4. **Restricted escape routes** – Escape paths may become quickly obstructed during a fire.
5. **Electrical equipment** – Pods typically include power outlets, lighting, and ventilation systems, increasing fire risk due to faults or misuse (e.g., charging lithium-ion devices).
6. **Combustible personal items** – Personal belongings increase the overall fire load.
7. **Human error** – Common causes of fire in hospitality settings (e.g., smoking, mishandling electronics) present a greater risk in confined environments.

I would further advise that compliance with the Scottish building regulations is the ultimate responsibility of the building owner, as such serious consideration should be advised when considering the health and safety of the occupants of a building.

Regards
Keith

Please note that I do not work on Fridays.

Keith Clark [redacted] | Senior Building Standards Surveyor | Planning & Building Standards | Sustainable Development | Place Directorate | The City of Edinburgh Council | Waverley Court, Level G:2, 4 East Market Street, Edinburgh, EH8 8BG | keith.clark@edinburgh.gov.uk | [redacted] | www.edinburgh.gov.uk

National Customer Satisfaction Survey



Your views are important to us, please take a moment to
share your experience in the
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From: Keith Clark
Sent: 09 April 2025 15:09
To: [redacted]
<[redacted]@cda-edin.co.uk>
Cc: [redacted]
<[redacted]@cda-edin.co.uk>;

[redacted] <[redacted]@cda-edin.co.uk>

Subject: RE: 24/03504/WARR - 109 Princes Street, Edinburgh

Hi [REDACTED]

The guidance we have would prohibit the use of laddered access in this instance.

4.2.1 Access within buildings

A building should be accessible to everyone. It should be possible for a person to move throughout a building and use the facilities present to the best of their ability, without assistance and without the need to overcome unnecessary barriers.

Every storey and level of a building should be accessible. However, it is recognised that it may not be necessary or, in some cases, reasonably practicable to provide full access to all parts of a building. Consequently, the following exceptions are noted.

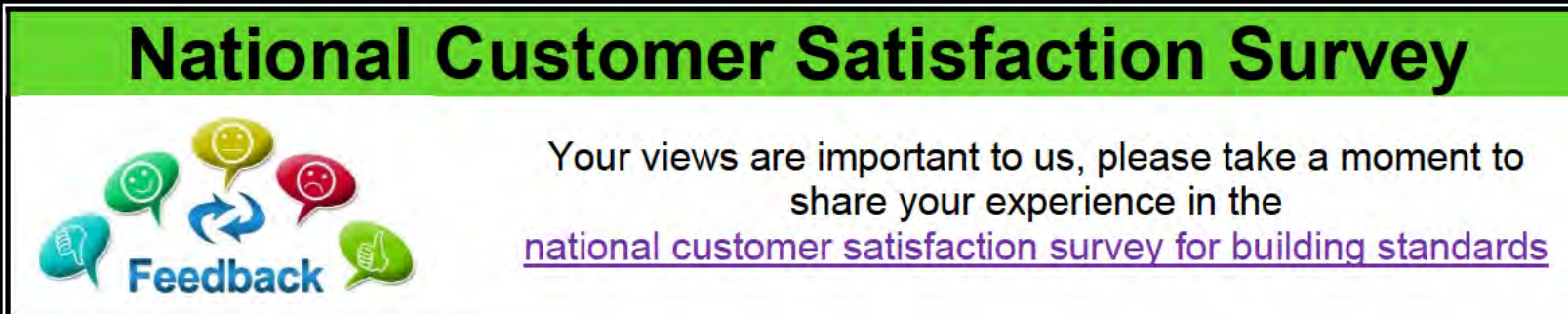
Limited access - level access, or access by stair, ramp or lifting device need not be provided to any storey, or part of a storey:

- containing only fixed plant or machinery, the only normal visits to which are intermittent, for inspection or maintenance purposes, or
- where access must be restricted to suitably trained persons for health and safety reasons, such as walkways providing access only to process machinery or catwalks and working platforms reached by industrial ladder.

Regards
Keith

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Keith Clark [REDACTED] | Senior Building Standards Surveyor | Planning & Building Standards | Sustainable Development | Place Directorate | The City of Edinburgh Council | Waverley Court, Level G:2, 4 East Market Street, Edinburgh, EH8 8BG | keith.clark@edinburgh.gov.uk | [REDACTED] | www.edinburgh.gov.uk

The graphic features a green header with the text 'National Customer Satisfaction Survey'. Below this, on the left, is a cluster of five speech bubbles: a yellow one with a smiley face, a green one with a smiley face, a red one with a frowny face, a blue one with a thumbs up, and a green one with a thumbs up. In the center, the word 'Feedback' is written in blue. To the right of the speech bubbles, the text reads: 'Your views are important to us, please take a moment to share your experience in the [national customer satisfaction survey for building standards](#)'.

<Keith.Clark@edinburgh.gov.uk>

From: [REDACTED]
<[\[REDACTED\]@cda-edin.co.uk](mailto:[REDACTED]@cda-edin.co.uk)>
Sent: 09 April 2025 08:30
To: Keith Clark

Cc: [REDACTED] <[REDACTED]@cda-edin.co.uk>; [REDACTED] <[REDACTED]@cda-edin.co.uk>

Subject: RE: 24/03504/WARR - 109 Princes Street, Edinburgh

 External email >

 Contains topics of a financial nature >

Hi Keith,

Apologies for chasing but we were keen to hear the outcome of your meeting where you had planned to discuss the capsules with your internal team.

Any feedback would be greatly appreciated.

Kind regards,

[REDACTED]

Senior Architect



16 Moray Place, Edinburgh EH3 6DT

t: 0131 225 1111

From: [REDACTED] <[REDACTED]@cda-edin.co.uk>

Sent: 28 March 2025 11:29

To: Keith Clark <Keith.Clark@edinburgh.gov.uk>

Cc: [REDACTED] <[REDACTED]@cda-edin.co.uk>; [REDACTED] <[REDACTED]@cda-edin.co.uk>

Subject: RE: 24/03504/WARR - 109 Princes Street, Edinburgh

Hi Keith,

We have followed up with the client and they have provided a WIP drawing for the three-tier option. This drawing is shared in confidence.

We look forward to receiving your thoughts on these and the two-tier option.

Kind regards,

 
Senior Architect



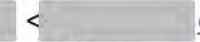
16 Moray Place Edinburgh EH3 6DT

t: 0131 225 1111

From: Keith Clark <Keith.Clark@edinburgh.gov.uk>

Sent: 27 March 2025 09:41

To:  <@cda-edin.co.uk>

Cc:  <@cda-edin.co.uk>;  <@cda-edin.co.uk>

Subject: RE: 24/03504/WARR - 109 Princes Street, Edinburgh

Hi 

Unfortunately, I have not had the chance to discuss this with my colleagues however I do have a team meeting this afternoon and intend to discuss then.

Asides access my initial thoughts are in relation to the ventilation provision together with the ability to hear life safety alarms.

Also, you mentioned that there was also a proposal for a three-tiered setup could you provide details of this together with the access proposal for the top level.

Regards

Keith

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National Customer Satisfaction Survey



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From: [redacted]
<[redacted]@cda-edin.co.uk>
Sent: 27 March 2025 08:28

To: Keith Clark <Keith.Clark@edinburgh.gov.uk>
Cc: [redacted] <[redacted]@cda-edin.co.uk>; [redacted] <[redacted]@cda-edin.co.uk>
Subject: FW: 24/03504/WARR - 109 Princes Street, Edinburgh

Morning Keith,

Apologies for chasing – have you had the opportunity to review the below/attached?

A further query we had was whether the dorm capsule would be considered a warrantable works?

Thanks in advance.

Kind regards,

[redacted]
Senior Architect

[redacted] 16 Moray Place Edinburgh EH3 6DT
t: 0131 225 1111

From: [redacted] <[redacted]@cda-edin.co.uk>
Sent: 20 March 2025 15:44
To: keith.clark@edinburgh.gov.uk
Cc: [redacted] <[redacted]@cda-edin.co.uk>; [redacted] <[redacted]@cda-edin.co.uk>
Subject: 24/03504/WARR - 109 Princes Street, Edinburgh

Afternoon Keith,

Thank you for your time last week to discuss the above project.

We have summarised the meeting and its outcomes below, if you could confirm by return that the below accurately reflects our discussions that would be greatly appreciated.

Mist system

We discussed the use of a mist system as part of our fire engineered solution. We were advised this was unlikely to present any issues.

300mm leading edge to bedrooms

Standard rooms do not allow for a 300mm leading edge as required by Scottish building regs (section 4.2.5). We presented a case that the compact room sizes do not lend themselves to accessible guests and that the hotel will provide compliant accessible accommodation which would meet these customer's needs. This strategy already in use within Zedwell hotels in England and this has not presented any issues.

We were advised to submit an *Alternative Means of Compliance* (AMOC) form to City of Edinburgh Council for further review.

Reduced door sizes

Standard rooms have 746mm clear opening doors. Building regulations state the clear opening of doors should be a minimum of 800mm clear when accessed from a 1500mm corridor or 825mm when accessed from 1200mm corridor (section 4.2.5). As above, these rooms will not be marketed towards customers with accessible needs and these customer's needs are met in our compliant accessible accommodation. We also raised that as the maximum occupancy of this room is generally two people could a position be formed on this basis.

We were advised to submit an *Alternative Means of Compliance* (AMOC) form to City of Edinburgh Council for further review.

Capsules

As this is a new offering within the Edinburgh market, we presented the capsule drawing for initial feedback. It was requested that we forward a copy of the drawing presented for further review. Please see attached drawing, shared in confidence. Any feedback you could provide would be greatly appreciated.

Sanitary provision for dormitories

Section 3.12.3 of the building regulations sets out the guidance for sanitary provision in non-domestic residential buildings. We highlighted that these numbers surpass the operational requirement for the capsule hotel based on the operator's previous experience. We noted that this has been tested within their existing capsule hotel portfolio.

We were advised to submit an *Alternative Means of Compliance* (AMOC) form to City of Edinburgh Council for further review.

AMOC process

We have reviewed the information available online, but we could not find further information on the process for submission and the timeline for responses. Could you please advise? From our discussions we understand that we can submit these in advance of their relevant warrant stages – please confirm.

Thank you again for your time.

Kind regards,


Senior Architect

 16 Moray Place Edinburgh EH3 6DT
t: 0131 225 1111

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