

Keith Clark

From: Keith Clark
Sent: 07 April 2026 15:53
To: [REDACTED]
Cc: 'CDA (109 Princes Street)'; [REDACTED]
Subject: RE: AMOC 01 Submission - 24/03504/WARR - 109 Princes Street

Categories: Egress Switch: Unprotected

Hi [REDACTED]

This proposal will require a more comprehensive and holistic assessment; this can only be properly undertaken at the appropriate stage of the process.

For example, presently the proposal does not appear to adequately address the provision of accessible facilities, including both sleeping accommodation and sanitary/washing facilities, neither has it been established if the pods should be treated as individual bedrooms or collectively as a dormitory.

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
[national customer satisfaction survey for building standards](#)

From: [REDACTED]
<[REDACTED]@cda-edin.co.uk>
Sent: 02 April 2026 16:50
To: Keith Clark

<Keith.Clark@edinburgh.gov.uk>

Cc: CDA (109 Princes Street) <[REDACTED]@cda-edin.co.uk>; [REDACTED] <[REDACTED]@cda-edin.co.uk>; [REDACTED] <[REDACTED]@edinburgh.gov.uk>
Subject: RE: AMOC 01 Submission - 24/03504/WARR - 109 Princes Street

 External email >

Hi Keith,

Thank you for the response.

To clarify, this AMOC submission will only be reviewed alongside the Stage 3 warrant application?

As there could potentially be impacts upon the general arrangement layouts we had hoped to reach agreement on the communal sanitary facilities ahead of this. Could you let us know your thoughts?

Kind regards,

[REDACTED]

[REDACTED]
Project Director



16 Moray Place Edinburgh EH3 6DT

t: 0131 225 1111 m: [REDACTED]

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

Sent: 02 April 2026 16:41

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

Cc: CDA (109 Princes Street) <[REDACTED]@cda-edin.co.uk>; [REDACTED] <[REDACTED]@cda-edin.co.uk>; [REDACTED] <[REDACTED]@edinburgh.gov.uk>

Subject: RE: AMOC 01 Submission - 24/03504/WARR - 109 Princes Street

Hi [REDACTED] this issue will be considered and addressed within the appropriate stage submission within the building warrant process.

Regards
Keith

Please note that I do not work on Fridays.

National Customer Satisfaction Survey



Your views are important to us, please take a moment to share your experience in the [national customer satisfaction survey for building standards](#)

From: [REDACTED]
<[REDACTED]@cda-edin.co.uk>
Sent: 02 April 2026 16:11
To: Keith Clark

<Keith.Clark@edinburgh.gov.uk>

Cc: CDA (109 Princes Street) <[REDACTED]@cda-edin.co.uk>; [REDACTED] <[REDACTED]@cda-edin.co.uk>

Subject: RE: AMOC 01 Submission - 24/03504/WARR - 109 Princes Street

Keith,

Hope you are well.

We have reviewed the comments received in September and have revised the proposals in response. Additional facilities have now been included and the numbers of pod capsule beds in dormitories have been reduced to better align the sanitary provision ratios.

Please see attached

- AMOC Sanitary Provision Report Revision P03
- AMOC Operator Washroom Capacity Assessment Report
- Proposed Detailed Layout plans of the Communal Sanitary Facilities with remaining non-compliances at basement and first mezzanine levels

If there is any further information required, please do not hesitate to ask but we look forward to your response.

Kind regards,

[REDACTED]

[REDACTED]

Project Director



16 Moray Place Edinburgh EH3 6DT

t: 0131 225 1111 m: [REDACTED]

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

Sent: 04 September 2025 16:05

To: [REDACTED] <[\[REDACTED\]@cda-edin.co.uk](mailto:[REDACTED]@cda-edin.co.uk)>

Cc: CDA (109 Princes Street) <[\[REDACTED\]@cda-edin.co.uk](mailto:[REDACTED]@cda-edin.co.uk)>; [REDACTED] <[\[REDACTED\]@cda-edin.co.uk](mailto:[REDACTED]@cda-edin.co.uk)>

Subject: RE: AMOC 01 Submission - 24/03504/WARR - 109 Princes Street

Hi [REDACTED]

We have considered the proposal within your Alternative Means of Compliance application in relation to the proposed sanitary provision.

In order to substantiate the behavioural assumptions and usage patterns outlined within this proposal, it is recommended that quantitative empirical data be provided. This should include evidence-based analysis of usage parameters, peak usage times, and demographic variations in facility use. Such data is essential to support the observational claims made and to ensure that design assumptions align with actual user needs.

It is noted that the current proposal does not appear to address the requirement for wash hand basins (WHBs) serving the dormitories, as per the guideline ratio of one WHB per four persons or part thereof. This requirement encapsulates the provision of WHBs associated with WCs and should be considered a distinct and necessary element of sanitary provision and not simply solely in correlation to the WC provision.

The proposal suggests that shower usage within the basement and first-floor mezzanine levels will be distributed throughout the day. However, it is reasonable to expect peak demand periods, particularly during morning and early evening hours. These anticipated peaks must be factored into both the design and capacity planning to avoid congestion and dissatisfaction.

Several mitigating measures are cited in the proposal; however, their effectiveness appears limited and may not sufficiently address the underlying shortfall in sanitary provision:

- **Increased cleaning schedules**, while beneficial, this will inherently reduce access to facilities during cleaning periods, thereby exacerbating availability concerns during peak times.
- **Use of trough-style WHBs**, while offering a degree of spatial flexibility, still limits users to specific faucet positions, which may not adequately meet comfort or privacy expectations.
- **NDTH guidance** supports provision based on designed occupancy levels. However, the proposal appears to interpret this guidance based on partial occupancy rates, whereas the guidance itself is predicated on full designed occupancy. This misalignment could lead to under-provision.

- **The introduction of signage and booking systems** for shower use, while potentially helpful for managing demand, implicitly acknowledges a deficiency in capacity and may negatively affect the user experience.

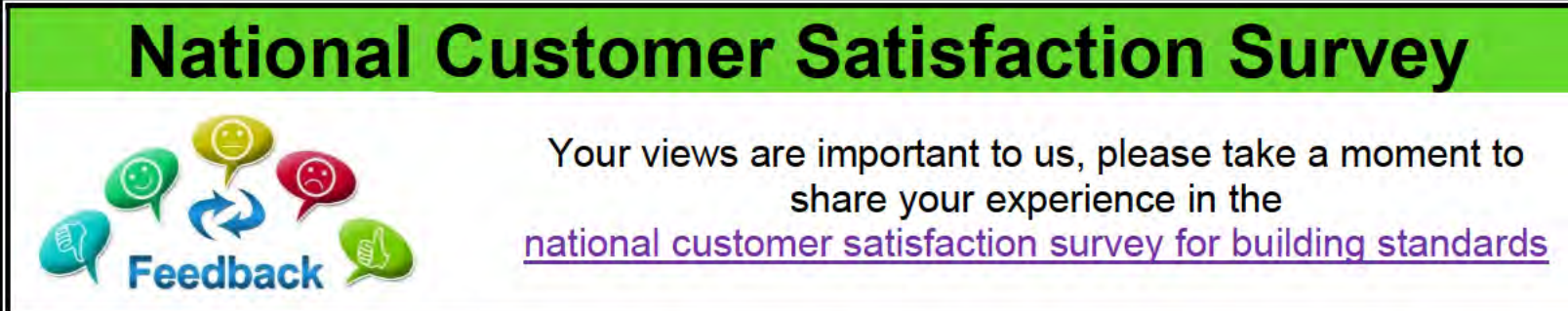
In conclusion, I can advise that this Department is not satisfied that the alternative proposal meets the mandatory Standard 3.12

Every building must be designed and constructed in such a way that sanitary facilities are provided for all occupants of, and visitors to, the building in a form that allows convenience of use and that there is no threat to the health and safety of occupants or visitors.

Kind 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

The graphic features a green header with the text 'National Customer Satisfaction Survey' in bold black font. Below the header, on the left, is a cluster of five speech bubbles: a green one with a smiley face, a yellow one with a neutral face, a red one with a sad face, a blue one with a thumbs up, and a green one with a thumbs down. The word 'Feedback' is written in blue below these bubbles. To the right of the 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](#)'.

From: [redacted]
<[redacted]@cda-edin.co.uk>
Sent: 31 July 2025 15:22
To: Keith Clark

<Keith.Clark@edinburgh.gov.uk>

Cc: CDA (109 Princes Street) <[redacted]@cda-edin.co.uk>; [redacted] <[redacted]@cda-edin.co.uk>

Subject: FW: AMOC 01 Submission - 24/03504/WARR - 109 Princes Street

Hi Keith,

Hope you are keeping well.

Could you please update us on the status on the attached AMOC please?

If anything requires further discussion, we are happy to arrange a call.

Kind regards,


Senior Architect

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

From:   < cda-edin.co.uk>

Sent: 23 June 2025 11:34

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

Cc: CDA (109 Princes Street) < cda-edin.co.uk>;   < cda-edin.co.uk>

Subject: AMOC 01 Submission - 24/03504/WARR - 109 Princes Street

Keith,

As we discussed earlier in the year we have compiled an AMOC submission for the proposed reduced communal sanitary facilities for the dormitory areas in the Zedwell hotel at 109-112 Princes Street (Former Debenhams).

Please see attached form, reports and supporting information. Please can you confirm receipt of this email or if the information is required to be submitted in another way, please let us know as soon as possible. Many thanks.

- AMOC CEC Submission Form
- AMOC Sanitary Provision Report
- AMOC Operator Statement
- Proposed General Arrangement Floor Plans for levels with dormitory facilities
- Proposed Detailed Layout plans of each Communal Sanitary Facility

If there is any further information required, please do not hesitate to ask.

Kind regards,



Project Director



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

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