

Keith Clark

From: Keith Clark
Sent: 20 May 2025 12:41
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: 24/03504/WARR - 109 Princes Street, Edinburgh

Categories: Egress Switch: Unprotected

Hi Clair

Whilst it is appreciated that sleeping pods within hotels exist, they do vary greatly in size accessibility, ventilation, lighting provisions etc.

In this instance would treat the proposed pods as fixtures and as such will require to have compliant access this is as opposed to bunkbeds which we would treat as furniture and not warrantable.

The compliant access would be a requirement for all users and not just a consideration for clients with a disability

Other issues would be as follows

- Restricted access through the narrow point at the foot of the bed restrict the usability
- Exiting the pod would be foot first denying the user sight of the laddered access
- Temperature control within the pod, no control of the occupant's heat produced.
- Poor ventilation
- Possible disorientation from the hotels life safety system

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]
Sent: 15 May 2025 11:22
To: Keith Clark
Cc: [REDACTED]; [REDACTED]
Subject: RE: 24/03504/WARR -
109 Princes Street, Edinburgh

External email >

Hi Keith,

Apologies for chasing but have you had a chance to review our earlier in email in relation to the ladders within the dorms?

Highlighted below for ease.

Kind regards,

[REDACTED]
Senior Architect

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

From: [REDACTED] <[\[REDACTED\]@cda-edin.co.uk](mailto:[REDACTED]@cda-edin.co.uk)>
Sent: 09 May 2025 11:22
To: [REDACTED] <[\[REDACTED\]@cda-edin.co.uk](mailto:[REDACTED]@cda-edin.co.uk)>; Keith Clark <Keith.Clark@edinburgh.gov.uk>
Cc: [REDACTED] <[\[REDACTED\]@cda-edin.co.uk](mailto:[REDACTED]@cda-edin.co.uk)>; [REDACTED] <[\[REDACTED\]@cda-edin.co.uk](mailto:[REDACTED]@cda-edin.co.uk)>
Subject: RE: 24/03504/WARR - 109 Princes Street, Edinburgh

Hi Keith,

We have received our Stage 1 warrant approval – thank you.

Have you had the opportunity to review below email?

Kind regards,



Senior Architect



16 Moray Place Edinburgh EH3 6DT

t: 0131 225 1111

From: [redacted] <[redacted]@cda-edin.co.uk>
Sent: 16 April 2025 10:30
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

Morning Keith,

Further to your email below and our call on Monday 14th April please see below for our initial thoughts on the use of ladders as part of the dormitory capsules/bunk beds.

While we understand that a building should be accessible to everyone, there is provision within the building regulations under section 4.2.1 Access within buildings that level or ramped access or access by a lift need not be provided:
in a residential building, such as a hotel, to an upper storey or level containing neither communal facilities or accommodation, including bedrooms, designed to be accessible to a wheelchair user.

These bed capsules are not designed for use by wheelchair users; however, we have provided separate accessible dormitories for this user group. This idea was presented to the Edinburgh Access Panel and was positively received by the committee. Ensuring that the same accommodation type is available to all users, albeit in a format that meet their specific needs.

For those with alternative accessibility needs the standard dorms remain accessible to them, and they can be accommodated within a lower-level capsule. Available upon request at time of booking.

The 'bunk bed' hostel dormitory concept is widely used throughout Edinburgh and therefore we would present the case that this is a widely accepted format of sleeping accommodation.

We trust that the above addresses your concerns, however if you deem it necessary to address this further through a formal submission of an Alternative Means of Compliance application please confirm by response.

AMOC process generally

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.

Kind regards,


Senior Architect

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

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

Sent: 09 April 2025 15:09

To:  < cda-edin.co.uk>

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

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

Hi 

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

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: 09 April 2025 08:30
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,

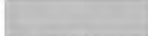
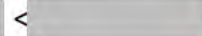
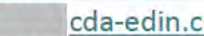
Apologies for chasing but we were keen to hear the outcome of your meeting where you had planned to discuss the capsules with your internal team.

Any feedback would be greatly appreciated.

Kind regards,

 
Senior Architect

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

From:   <@cda-edin.co.uk>
Sent: 28 March 2025 11:29
To: Keith Clark <Keith.Clark@edinburgh.gov.uk>
Cc:   <@cda-edin.co.uk>;   <@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.

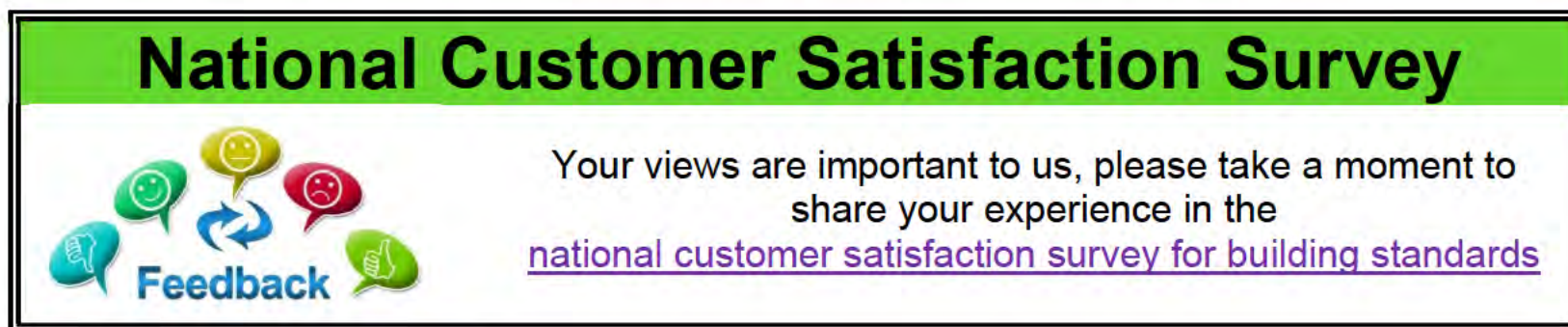
Asides access my initial thoughts are in relation to the ventilation provision together with the ability to hear life safety alarms.

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

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 banner features a green header with the text "National Customer Satisfaction Survey" in bold black font. Below the header, on the left, is a graphic with four speech bubbles (green, yellow, red, and blue) and a blue circular arrow, with the word "Feedback" in blue text. To the right of the graphic, 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: 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.

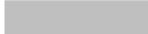
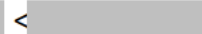
Kind regards,

 
Senior Architect



16 Moray Place Edinburgh EH3 6DT

t: 0131 225 1111

From:   <@cda-edin.co.uk>
Sent: 20 March 2025 15:44
To: keith.clark@edinburgh.gov.uk
Cc:   <@cda-edin.co.uk>;   <@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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