

## Summary of Items Discussed in 1/2014 APSEC Discussion Forum on 10 January 2014

|    | Items proposed by Convenors for Discussion  | Summary of Discussion and BD's Responses   |
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|    | <b>Items raised by HKIA</b>   |  |
| 1. | <p><u>Matters Arising – Summary of Discussion Forum held on 2 August 2013</u></p> <p>(a) <u>Item 6 (regarding SBD Guidelines) of the confirmed Summary</u><br/>           Our query is concerned about whether the facade of the <b>projection plane (the X-plane) parallel to a street</b> (or set along any tangent of a curvilinear street) can be projected either from the side of the street or from the other side. However, in the confirmed summary of items, it is noted that only the second projection plane (i.e. the Y-plane) is addressed, but not the X-plane, which is the subject of our query.</p> <p>Our understanding at the discussion of the last forum is that for the <b>X-plane</b>, the facade can also be projected from <b>either the street side</b> or the <b>other side</b>. Please confirm our understanding is correct.</p> | <p>(a) The BD clarified that for the 1<sup>st</sup> projection plane (the X-plane), the elevation of the buildings concerned had to be projected onto the street side of the X-plane, but not onto the other side if it was not fronting onto a street. According to Figure 8 of Appendix B of APP-152, one of the planes should parallel to an adjoining street. As the purpose of building separation is to improve air ventilation, enhance environmental quality at pedestrian level and mitigate heat island effect arising from the undesirable walling effect of “long buildings”, the X-plane must be projected onto the street side. However, for the second projection plan (i.e. Y-plane), it can be accepted as projecting not onto the street side as shown in Figure 17 of Appendix B of PNAP APP- 152</p> |

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|           | <p>(b) <u>Item 1(d) (regarding water-borne pipes / services laid over refuge roof) of the confirmed Summary</u></p> <p>Following our last query, we further propose for consideration that the metal platform over such water-borne pipes with a <b>width and length</b> of at least <b>50% greater than the width of the widest required staircase</b> serving the roof can be included in the refuge area calculation. This is also in line with the logic of Clause B18.3(d) of the FS Code regarding the minimum dimension of refuge area.</p>  | <p>(b) The BD advised that whether such metal platform over water-borne pipes at roof could be included in the refuge area calculation would be considered on a case-by-case basis. In any case, extensive metal platform would not be accepted.</p>   |
| <p>2.</p> | <p><u>Use of Grass Turf for Refuge Roof</u></p> <p>Paragraph 3 of PNAP APP-122 regarding Wholesale Conversion of Existing Buildings states that “To <b>promote the provision of greenery for environmental enhancement</b>.... In view of the constraints posed by the original design of the existing building, the BA is also prepared to accept a refuge floor, including the main roof as a refuge floor... subject to the provision of enhanced FSI... and the incorporation of suitable greenery within the refuge floor. If the <b>main roof is used as a refuge floor</b>, it should be designed as a <u>green roof</u> such that no less than 50% of the total roof area is planted with greenery.” It is also stated in the footnote that “Greenery in the form of a <b>short grass turf suitable for foot traffic</b> can be counted towards the net area for refuge.”</p> <p>Based on the above rationale, we believe that for <b>new development proposals</b>, short grass turf suitable for foot traffic is also readily acceptable to be provided at the <u>refuge roof</u> for environmental enhancement purpose and to be counted towards the net area for refuge</p> | <p>The BD remarked that the portion of a roof providing access between required staircases (where deemed necessary) should be hard-paved.</p> <p>Whether short grass turf suitable for foot traffic was acceptable to be provided at the refuge roof and be counted towards the net area for refuge would be considered on a case-by-case basis. As the refuge floor may also be used for firefighting staging activities, FSD’s advice regarding such provision would also be sought on such circumstances.</p> |

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|    | as well. Please confirm our understanding is correct.   |   |
| 3. | <p><u>Code of Practice for Fire Safety in Buildings 2011 (FS Code)</u></p> <p>(a) <u>Maximum Travel Distance for Use Classification 1 and 2</u><br/> Under <b>Clause B11.3(a)(i)</b>, it is stated that <i>“In a storey which is served by two or more protected exits or points of discharge... the maximum travel distance including any deadend travel distance, is limited to... 24m from the flat/guestroom exit door to the nearest required staircase...”</i> Together with Clause B11.2 regarding deadend travel distance for the same use classification (i.e. 24m from any point within a flat to its exit door), it is apparent that the maximum total travel distance permitted will then be 48m (24m + 24m), providing that travel in 2 different directions at a point 15m from the flat exit door is also fulfilled.</p> <p>However, in a recent project, the case-officer has insisted that the maximum travel distance from the farthest point in a flat to the nearest required staircase is only 24m. Please confirm that the interpretation in the former paragraph (total maximum travel distance being 48 m) is correct.</p> <p>(b) <u>Smoke Outlets for Basement</u><br/> Under <b>Clause C14.2(a)</b>, it is stated that <i>“smoke outlets... be not more than 30m apart and situated along the street frontages or adjacent to external walls”</i>, and under <b>Clause C14.2(b)</b>, it is stated that <i>“smoke outlets... be evenly distributed around the perimeter of</i></p> | <p>(a) The BD explained that the requirements of deadend travel distance and maximum travel distance for buildings in Use Classifications 1 and 2 had been stated in Clauses B11.2(a) and B 11.3(a)(i) of the FS Code 2011. For cases not involving balcony approach of the above use classifications, the total maximum travel distance from any point within a unit to the nearest required staircase achievable could be 48m.</p> <p>(b) The BD clarified that the said separation requirement of not more than 30m apart for smoke outlets applied only to the external discharge points but not to the internal smoke intake openings within the basement. In addition, the BD highlighted that the internal smoke intake openings within the basement</p> |

*the building... ”*

Please clarify if the aforesaid separation requirements of not more than 30m apart for the smoke outlets apply only to the “external outlets” and do not apply to the “internal smoke intake openings” within the basement.

(c) Fire Separation in Same Compartment and Occupancy

In an institutional project, the case officer has requested that fire separation e.g. fire-rated doors/fire shutters be provided between common corridor/atrium and the adjacent same institutional uses in the same compartment (e.g. computer room, multi-purpose room, staff office, multi-media seminar/conference rooms, meeting room, etc.), as the officer opines that different usages of spaces have to be separated with fire-resistant construction. Please confirm that the requested fire separation is not necessary as the mentioned rooms and the common corridor/atrium are within the same compartment.

(d) Discharge Width of Required Staircase

In a residential project, our proposal to have different widths for the 2 required staircases of the residential tower (one being 1100mm wide and the other 1500mm) has been rejected, despite their compliance to the requirements of total discharge value and minimum individual and total width of staircases as stipulated in Clause B12.1 and B8.1. Further, we have been requested to determine the minimum width of required staircases by dividing

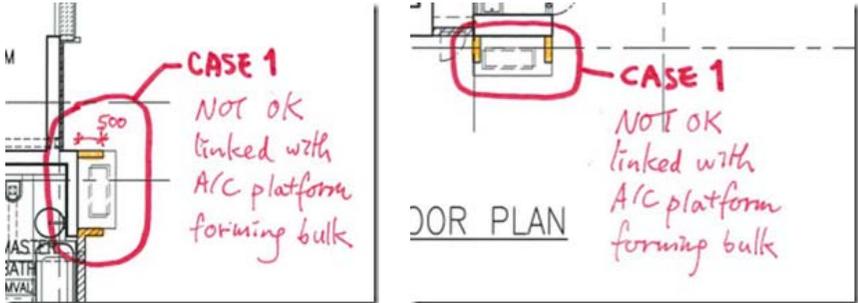
should be evenly distributed and provided to every fire compartment and met the aggregated area requirements and other requirements in Clause C14.2 of the FS Code 2011 unless a dynamic smoke extraction system was to be provided in accordance with Clause C14.3 of the FS Code 2011.

(c) The BD advised that a school building as a whole could be considered as an educational establishment and if under the control of one operator, could be considered as under single occupancy. As such, multi-purpose rooms/classrooms etc. should all be considered as under the same use classification and a single occupancy. The BD requested HKIA to provide information on specific uses where fire separation was uncertain if necessary.

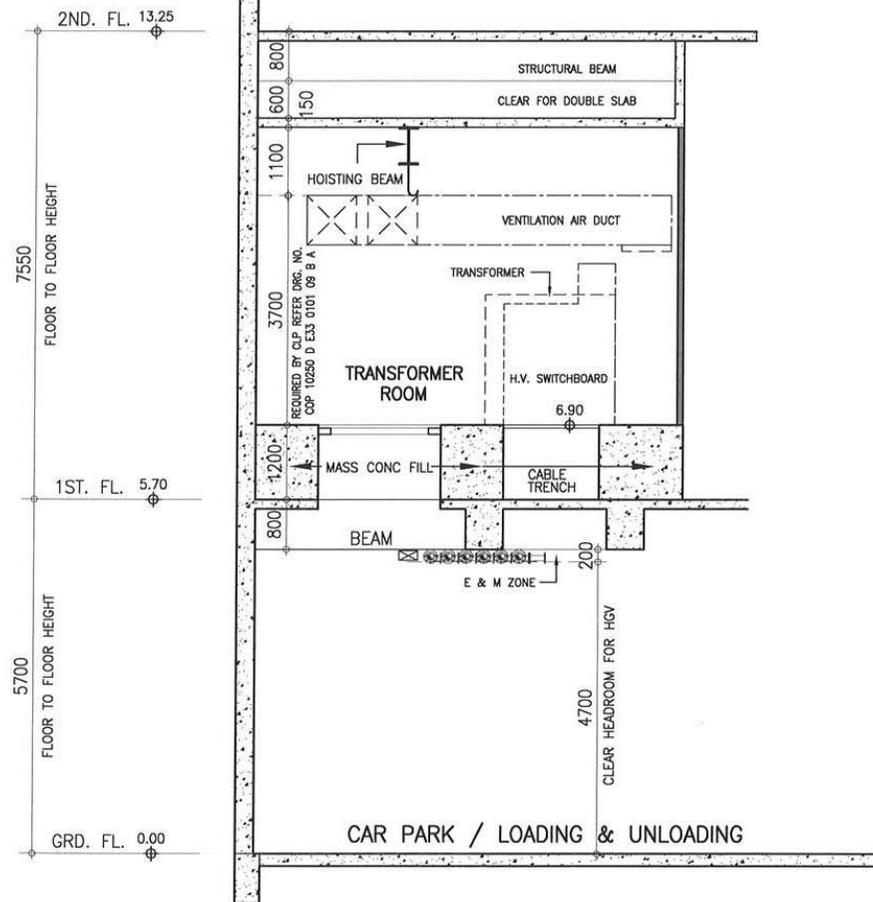
(d) The BD confirmed that it was acceptable to include all required staircases into the calculation for minimum total width of exit routes if the width of these required staircases were not in excess of 50% above the width of the narrowest staircase according to Clause B8.1(b) of the FS Code 2011.

The BD further advised that normally it might not be necessary to determine the minimum width of required staircases by

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|    | <p>the total discharge value by the number of staircases.</p> <p>Please confirm that it is allowed to provide required staircases of different widths, and that it is not necessary to determine the minimum width of required staircases in the aforementioned way.</p> <p><b>Clause B8.1</b></p> <hr/> <p>Every building, except those buildings permitted under Clause B6.1 to have only one required staircase, should be so constructed that there are available from each storey not less than 2 exit routes or such greater number as may be required by Table B2. The width of each exit route and the total width of all the exit routes should be not less than the width shown in Table B2 according to the occupant capacity and the number of exit routes provided. Provided that:</p> <p>(a) this requirement should apply to only one of the storeys of a maisonette; and</p> <p>(b) where two or more exit routes (required by Table B2 to serve a storey) vary in width, any width of an exit route in such group in excess of 50% above the width of the narrowest exit route in such group should not be included in the calculation for the minimum total width of exit routes as required by column 4 of Table B2.</p> <hr/> <p><b>Subsection B12 - Discharge Value and Width of Required Staircase</b></p> <p><b>Clause B12.1</b></p> <hr/> <p>The required staircases serving the storeys of a building above the ground storey should have a total discharge value of not less than the total occupant capacity of those storeys assessed in accordance with Subsection B4.</p> <hr/> | <p>dividing the total discharge value by the number of staircases and it was acceptable to have required staircases at different sizes provided that the width of the required staircases would satisfy the requirements in Table B2 of the FS Code 2011.</p>                     |
| 4. | <p><u>Specified Streets</u></p> <p>According to PNAP APP-152 Appendix A, if a “street” is defined according to either B(P)R 18A (3)(a)(i) or (ii), the relevant design requirements included under PNAP APP-152 shall apply. To avoid confusion, please clarify that such “street”, if not less than 4.5m wide,</p>   | <p>The BD advised that if a “street” fell within the category under B(P)R 18A (3)(a)(i) or (ii) and was not less than 4.5m wide, this “street” should also be considered as a “specified street” for the purpose of site classification. For instance, a corner site with its</p> |

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|           | <p>should also be considered as a “specified street” and be considered in determining the Site Classification.</p>   | <p>boundary meeting the required percentage as stated in B(P)R 2 abutting on such “streets” should be classified as a Class B or Class C site.</p>  |
| <p>5.</p> | <p><u>Architectural Fins at A/C Platform</u></p> <p>As discussed in a previous Forum, architectural features not exceeding 500mm from external walls of a building in the context of PNAP APP-2 could be incorporated in a curtain wall design. By the same token, it is suggested that 500mm architectural fins attached to the side of an A/C platform (see below sketches) be considered acceptable.</p>  | <p>The BD advised that exemption from site coverage/plot ratio calculations for architectural features attached to A/C platforms should be considered on a case-by-case basis. Apart from obstruction for future maintenance, consideration would be given under PNAP APP-2 as this kind of amenity feature should not bring significant impact on building bulk.</p> |
| <p>6.</p> | <p><u>Transformer Room</u></p> <p>(a) Areas around the cable trench in a transformer room are commonly constructed by double slabs with voids in between. Recently, a case officer has commented that the “double slabs with voids” is not acceptable and such void has to be filled up by mass concrete to avoid any unauthorized use in future. It is suggested that the voids in this case, which are not higher than 1.5m, should be disregarded from GFA calculation without the</p>      | <p>(a) The BD advised that for practical maintenance access of reasonable size provided to a cable trench of reasonable design, consideration might be given to disregard the voids from GFA calculations.</p> <p>For disregarding from GFA calculations, voids or spaces with a headroom not greater than 1.5m, and the need and material for</p>                    |

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|  | <p>need to be filled up with mass concrete or to apply for modification of B(P)R23(3)(a). Please also advise whether the same could apply to all voids or spaces not higher than 1.5m.</p> <p>(b) According to CLP standard drawings (please refer to Appendix I), if all the requirements regarding the headroom of the transformer room are incorporated, the total floor-to-floor height of the transformer room may exceed 7.5 meter. The sketch below shows a proposal with the combined standard requirements from CLP for a transformer room at 1st Floor and a HGV parking space at Ground Floor, and the required floor-to-floor height. Please advise if the floor-to-floor height is acceptable.</p> | <p>backfilling such voids or spaces, the BD would consider on a case-by-case basis. When necessary, the BD might also seek comment from LandsD.</p> <p>(b) The BD advised that the headroom of a transformer room should make reference to the requirements of the utility companies and the types of plant to be installed.</p> <p>[Post-meeting note: Isolated room / area of high headroom requirements might not be a sufficient ground for excessive storey height for a particular floor.</p> |
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**SECTION**

**Items raised by HKIE**

7. Matter relating to Barrier Free Access Requirement

Due to existence of ground beams which form part of stability structures (i.e. wind resisting members), it becomes not possible to modify the existing structure to provide the access ramp at G/F for

The BD explained that exemption from or modification of the barrier free access requirements would be considered by BA and the Advisory Committee on Barrier Free Access on individual merits in

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|           | <p>compliance of the “Barrier Free Access” requirement. Would the case officers always submit these cases to the Advisory Committee on Barrier Free Access for review and consideration.</p>   | <p>accordance with PNAP APP-41. Applicants are required to prove that the provision of such access would impose unjustifiable hardship on them.</p> |
| <p>8.</p> | <p><u>PNAP APP-126 – Erection of Signboards</u></p> <p>In the revised BD PNAP APP-126, Appendix B, item (18), there is a requirement listed as follows: <b>“No portion of a signboard erected on the roof of a building shall be within a distance of 1.5m from the inside face of the roof parapet or curb. Such set back area shall be accessible from other part of the roof.”</b></p> <p>In view of the above requirement, our members would like to know the followings:</p> <ul style="list-style-type: none"> <li>• The rationale behind this requirement?</li> <li>• As there is no differentiation between accessible main roof and inaccessible upper roof, such as, top of water tanks, top of lift machine room, top of meter/plant room...etc, would it may cause unnecessary hardship for practitioners to comply with this PNAP for upper inaccessible roof? Or even deprive the owner of the chance to erect signboard on upper roof for relatively small upper roof area? Would it be more legitimate to differentiate and to exclude inaccessible roof, such as, top of water tanks, top of lift machine room, top of meter/plant room...etc, from this requirement?</li> </ul> <p><b>Decision sought: Would it be more appropriate to differentiate and to exclude the inaccessible roof from this requirement if there is no</b></p> | <p>The BD advised that the requirement was to avoid burning debris falling onto lower floors and providing access for firefighting.</p>             |

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|           | <p><b>specific safety and abuse concern.</b></p> <p>A copy of sketch (please refer to Appendix II) depicting the proposed requirement for main roof and inaccessible roof are shown for easy reference.</p>   |  |
|           | <p><b>Item raised by BD</b></p>   |  |
| <p>9.</p> | <p><u>Review of the Approval Process</u></p> <p>Pursuant to the issuance of Circular Letter “Curtailed Checking of Drainage Plans and Regulation 29(3) of the Building (Administration) Regulations” dated 30 October 2013, the BD introduced further facilitation measures to representatives of HKIA, HKIE, HKIS, AAP and REDA.</p> | <p>The BD introduced to the forum that a new strategy was being formulated to improve its efficiency in processing structural plans and general building plans by fine-tuning curtailed checking of these plans. The BD reiterated that it was the duty of the AP/RSE to ensure compatibility among various types of plans for a development. In addition, as the AP/RSE had to comply with the BO, the BD was considering checking only on a specific percentage of the items of fundamental issues. Some extant full checking items including the compatibility of structural plans with building plans would only be checked when selected for audit. The BD would provide more details of the facilitation measures in due course.</p> <p>In response, HKIE suggested the BD that the consent to the commencement of construction of pile caps could be issued prior to the approval of general building plans as a further facilitation. HKIE would approach the BD to explore the feasibility of its suggestion.</p> |

|     | <b>AOB Items</b>  |  |
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| 10. | <p><u>Building (Planning) Regulation [B(P)R] 24 – Headroom of Lavatories</u><br/>(Item raised by AAP)</p> <p>AAP enquired if lavatories located underneath staircases for residential accommodation were considered as habitable areas, hence were required to comply with the storey height requirements under B(P)R 24.</p> | <p>The BD would study the enquiry and provide a respond in due course.</p>   |
| 11. | <p><u>Cast Iron Foul Water, Waste Water and Rainwater Pipes</u><br/>(Item raised by BD)</p> <p>Pursuant to a report received from general public, the BD reminded the industry to be more mindful in specifying the quality and selecting cast iron pipes in their projects.</p>  | <p>The BD reminded the industry that under the BO, Building (Construction) Regulation 3 and PNAP APP-13, APs / RSEs / RGEs are responsible for supervising building works including the selection and application of building materials and certifying compliance with relevant provisions of the BO upon completion of works, amongst others, the use of cast iron pipes in private developments. PNAPs APP-118 and APP-133 provide more details regarding this matter.</p> <p>In addition, EMSD’s requirements for electrical continuity in respect of the selection and application of water pipes were relevant.</p> |
| 12. | <p><u>Circular Letter dated 9 January 2014 regarding Rectification Works of Completed Building / Building Works Following the Issue of Occupation Permit (Circular Letter)</u><br/>(Item raised by BD)</p> <p>In response to the industry’s concern about the MW submissions for</p>  | <p>Under the Circular Letter, Post-OP Rectification Works Procedures</p>   |

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|     | <p>rectification works carried out shortly after issue of an OP, a working group comprising members representing HKIA, HKIE, HKIS, REDA, HKCA and AAP had been formed to look into the subject matter. Based on the working group's recommendations, the Circular Letter was issued on 9 January 2014.</p> | <p>(PRWP) were introduced as an alternative for MW submissions in respect of rectification works for the completed building and building works by the same project team (i.e. AP, RSE, RGE, RGBC and RSC) after issue of OP.</p> <p>Under the PRWP, a commencement notice should be submitted not less than 7 days prior to the commencement of rectification works but in no case later than one month after the issue of OP. The rectification works should be completed within 24 months from the date of the OP and a completion notice should be submitted to the BD by the project team not less than 14 days after completion of the works. Records of completed rectification works items were not required to be submitted unless there was a change in project team member during the course of rectification works. Stakeholders might wish to find the details by referring to the Circular Letter.</p> |
| 13. | <p><u>PNAP APP-23 (November 2013 version)</u><br/>(Item raised by BD)</p> <p>The BD advised that the revised PNAP APP-23 was issued in November 2013 which introduced measures to streamline the process of renewal of hoarding permits based on AP's certification.</p>                                   | <p>Under this self-certification approach, the AP would be required to submit a Certificate for Hoardings / Covered Walkways or Gantries (Appendix E of the draft revised PNAP APP-23) with record photos of the hoarding and covered walkway in support of the application for renewal of a hoarding permit. An audit check system would be put in place to ensure public safety.</p>  |
| 14. | <p><u>FRR for Raised Floor</u><br/>(Item raised by BD)</p>   |   |

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|     | <p>Pursuant to Item 7(b) of APSEC Discussion Forum (ADF) on 6 January 2012 and Item 5 of ADF on 3 August 2012, the BD provided an update on the FRR requirement for raised floor system exceeding 600mm in height to be installed in a data centre.</p> | <p>The BD cited a recent case tabled to the Building Committee that raised floor systems higher than 600mm without adequate FRR was accepted subject to the submission of justification for the raised floor system and provision of fire services installations to the satisfaction of the FSD.</p>  |
| 15. | <p><u>Review of SBD Guidelines</u><br/>(Item raised by HKIA)<br/>HKIA enquired about the progress of review of SBD Guidelines.</p>  | <p>The BD advised that the revisions in the SBD Guidelines would be circulated to LandsD and PlanD for comment and the revisions would be finalised upon receiving their comments. BSC and APSEC members would then be consulted.</p>   |
| 16. | <p><u>Different interpretations of the Regulations or CoP</u><br/>(Item raised by BD)</p>   | <p>The more effective measure to address issues arising from different interpretations of the regulations or CoP between the AP and the BD case officer in an individual case is to directly seek clarification from the supervisor of the case officer.</p> <p>As an established practice of this Forum, the response from the BD should be regarded as a general comment only and should not be regarded as a determination for any individual case as case specific matters are outside the scope of the Discussion Forum.</p> |