

Summary of Items Discussed in 2/2014 APSEC Discussion Forum on 14 March 2014

	Items proposed by Convenors for Discussion	Summary of Discussion and BD's Responses
	Items raised by HKIA	
1.	<p><u>Matters Arising – 5/2013 APSEC Discussion Forum on 18 October 2013</u></p> <p>Pursuant to item 3 of the Discussion Forum dated 18 October 2013, we have prepared a list of building services plant rooms which are within the category of “Special Hazard” [under Section 3 (p.18) of the Code of Practice for Fire Safety in Buildings 2011 (FS Code)] and another list of building services plant rooms which should not be considered as “Special Hazard” as follows for consideration:-</p> <p><u>Special Hazard</u> (current list under the FS Code): Transformer rooms, electrical plant rooms, central A/C plant rooms, lift machine rooms, main switch rooms, generator rooms, boiler rooms, and <u>the like</u>.</p> <p>For “the like” items, we propose the following to be added to the list for the sake of clarity: <i>Chemical stores, Dangerous goods (DG) stores, and Battery & charger rooms.</i></p> <p>The following building services plant rooms should <u>not</u> be considered as “Special Hazard”:</p>	<p>The BD opined that it was not necessary to add to the list for Special Hazard areas. Regarding the list for non-Special Hazard areas, the BD commented that the size of the rooms concerned was also a factor of consideration. The BD further commented that “Electrical sub-switch rooms” was already covered by “Electrical meter rooms” and should be deleted. The BD also requested HKIA to clarify the abbreviations use and to propose a revised list for consideration.</p> <p>[Post-meeting notes:</p> <p>HKIA prepared the following list of areas that should not be considered as Special Hazard:</p> <p>Electrical Meter Rooms (EMR), Water Meter Cabinets, Water Pump Rooms, Fire Services (FS) Pump Rooms, Air Handling Unit (AHU) Rooms, Primary Air Unit (PAU) Rooms, Telephone & Broadcasting Equipment (TBE) Rooms, (MDF) Rooms, Fire Services (FS) Control Rooms, (FM200) Plant Room, Water Meter Rooms (WMR),</p>

	<p><i>Electrical meter rooms, Electrical sub-switch rooms (located on each floor), Water pump rooms, Fire services pump rooms, AHU rooms, PAU rooms, TBE / MDF rooms, Fire services control room, FM 200 plant room (for fire services), Water meter rooms, Cable duct / Pipe duct, ELV rooms, SMATV or CABD rooms, Computer server rooms, and the like.</i></p> <p>Please consider to incorporate / clarify the above in the relevant sections of the FS Code.</p>	<p>Cable Ducts, Pipe Ducts (PD), Extra-light Voltage (ELV) Equipment Rooms, Satellite Master Antenna for Television (SMATV) Rooms, Communal Aerial Broadcast Distribution (CABD) Rooms, Computer Server Rooms, and the like.</p> <p>The BD would follow up HKIA’s recommendation concerning the FS Code.]</p>
2.	<p><u>Code of Practice for Fire Safety in Buildings 2011 (FS Code)</u></p> <p>Clause B8.2 of the FS Code states that “<i>Where 2 or more required staircases are needed, people using one required staircase should be able to gain access to at least one other required staircase at any time, without having to pass through other person’s private premises.....</i>”.</p> <p>In an earlier BD Discussion Forum, it was clarified that the above requirement (i.e. gain access to one other required staircase at any time without having to pass through other person’s private premises) may not be applicable to building which is under one single common management. Under such circumstances, please clarify if such requirement is therefore not applicable to such building types as <i>Hotel, School, Hospital, Museum, Churches, PPE, Convention Centre (including their ancillary facilities such as storage, workshops, supporting offices, retails and restaurants managed by the same facilities management)</i> and the like, taking into account such buildings will be under one single common management, with</p>	<p>It was discussed that for common building types such as <i>School/Institution, Hospital, and Museum</i>, the BD would consider them operating under one single common management, and the requirement for access to one other required staircase at any time without having to pass through other person’s private premises was generally not applicable. While for building types such as <i>Hotel, Church, PPE, Convention Centre, and Clubhouse</i>, the BD would consider them on a case-by-case basis, and proof that the areas were under one single common management would be required as substantiation for the BD’s consideration.</p>

	<p>special building layout requirements, as well as unique functional requirements.</p>	
<p>3.</p>	<p><u>Matters Arising – 1/2014 APSEC Discussion Forum on 10 January 2014</u></p> <p>Following the last BD Discussion Forum, please confirm that bathrooms / lavatories pertaining to residential accommodation are <u>NOT</u> considered as habitable areas, and hence are <u>not</u> required to comply with the storey height requirements under Building (Planning) Regulation 24.</p>	<p>HKIA further pointed out that in the Building (Standards of Sanitary Fitments, Plumbing, Drainage Works and Latrines) Regulations (B(SF)R), “habitable space” excluded kitchens and lavatories.</p> <p>The BD explained that prior to its revision in 1987, the regulation B(P)R 24 had specific height requirements for rooms, kitchens and toilets, and the present regulation was meant to cover the same areas. Therefore, kitchen, bathroom, toilet and laundry were considered habitable areas and they had to follow B(P)R 24. The measurement of storey height was clarified in PNAP APP-5.</p> <p>[Post-meeting notes:</p> <p>HKIA opines that the B(SF)R and B(P)R should not have inconsistent definitions for “habitable space” and “room for habitation”. In addition, it can be deduced from B(P)R 30(1) that a room used for habitation is different from one used for the purposes of a kitchen. Furthermore, if lavatories were habitable, their windows should comply with B(P)R 30 in addition to B(P)R 36, which is not the present requirement. HKIA thus requests the BD to reconsider the above interpretation of B(P)R 24.]</p>

		The BD also advised that “ward” in hospitals should be considered as used for habitation.
4.	<p><u>Height of Building</u></p> <p>As a general principle, please confirm that concrete plinths on roofs for building services installation are to be disregarded from building height measurement under Building (Planning) Regulation 23(1), providing always that such plinths are not forming part of the elements of construction of the building concerned.</p>	The BD confirmed that non-structural concrete plinths on roofs for building services installations were disregarded for the purpose of measuring building height under regulation 23(1) of the Building (Planning) Regulations as the height of a building should be measured to the structural floor level of the roof over the highest usable floor space. For skylight, it should be considered on a case by case basis.
5.	<p><u>PNAP APP-93</u></p> <p>Whereas the draft revised PNAP APP-93 with incorporation of new paragraphs providing guidelines to the design of architectural features / screen for enclosing external drainage pipes, it has been our understanding that the subject of concern is mainly on soil & waste pipes, but not so much on storm water drain. Indeed, para. 3(b) of the same PNAP regarding the design criteria for internal pipe ducts & pipe wells are mainly concerned about internal common soil & waste stacks.</p> <p>Please clarify if our understanding is correct, and accordingly, design of architectural feature for enclosing storm water pipes alone on external wall can be relaxed from strictly following the new para. 7 of the draft revised PNAP.</p>	The BD clarified that the same criteria for the design of architectural features / screens for shielding external drainage pipes would apply to soil & waste as well as storm water pipes.

	Item raised by HKIE	
6.	<p><u>Processing of Plans</u></p> <p>To facilitate the plans processing and approval of GBP by FSD, we propose to request FSD to give priority to a) <i>New first submission of GBP</i> and b) <i>Final amendment of GBP</i>. To facilitate the process, the following procedures is suggested :</p> <ol style="list-style-type: none"> i. To state or chop by AP on the covering letter to BD showing explicitly the statement at the caption “First Submission” or “Final Amendment”; and ii. BD may notify FSD in their memo stating this is the “First Submission” or “Final Amendment” as declared by the AP. <p>FSD has shown their in principle agreement to the captioned proposal in the AP and FSD Liaison Meeting held in 28 Feb. 2014. FSD also agree to notify BD by email regarding decision on approval / disapproval of submission so as to speed up the process.</p>	<p>The BD clarified that as a copy of the AP’s covering letter would be attached with the referral to FSI plans to FSD, there was no need for the BD to separately notify FSD in the referral memo. In other words, APs would clearly provide identification for “first submission” and “Final Amendment” in their covering letter.</p>
	Item raised by HKIS	
7.	<p><u>Code of Practice for Fire Safety in Buildings 2011 (FS Code)</u></p> <p>FS Code Clause C9.1 (c) states that:</p> <p>"(c) a door provided at a lift landing to give access to the car of a lift and any other door to the liftwell wall should have an FRR of not less than that of the fire barriers therein with regard to integrity, or not less than -/120/-; "</p> <p>Please clarify which scenario below speaks the above-mentioned FRR requirement of lift landing door:</p>	<p>The BD clarified that -/120/- should be the minimum requirement.</p>

	<p>i. The FRR of landing door should be in any case not less than -/120/- following the FRR of fire barrier of lift well, irrelevant to the floor use.</p> <p>ii. The FRR of landing door should follow the FRR of the floor use. (For example, -/60/- for FRR of landing door at office floor, -/120/- for FRR of landing door at industrial workplaces floor, etc.)</p>	
	Item raised by BD	
8.	<p><u>Enclosing Payment with the Submitted Plans & Attaching Sufficient Sets of Plans in accordance with PNAP ADM-2</u></p> <p>It is noted that, in some occasions, the cheque for payment of fees is submitted separately from the plans and there are insufficient sets of plans attached for the BD to process.</p>	<p>The BD advised the stakeholders that the cheque for payment of fees should be submitted together with the plans so as to avoid sparing extra resources in chasing up the payment and refusal of plans under section 16(1)(f) of the Buildings Ordinance. In addition, AP was reminded to attach sufficient sets of plans in accordance with PNAP ADM-2 to facilitate plan processing.</p>
	AOB Items	
9.	<p><u>Clause B8.2 of the FS Code for Storey serving by Independent Required Staircases</u></p> <p>(Item raised by AAP)</p> <p>AAP enquired if Clause B8.2 was applicable to a story serving by independent required staircases, such as the extant staircase arrangement for basement.</p>	<p>The BD noted and would study the issue.</p>
10.	<u>Measures to Facilitate Plan Processing</u>	

	<p>(Item raised by AAP)</p> <p>AAP suggested the BD staff to allow more communication with AP to facilitate plan processing.</p>	<p>The BD replied that, in practice, APs could approach respective case officers to discuss their submissions. To further facilitate plan processing, the BD might include in the approval letter a list of non-compliant non-fundamental items and the APs should rectify these irregularities in the amendment submission.</p> <p>As an on-going exercise, the BD would introduce measures to further streamline the approval and other work process in order to discharge the building control duties more efficiently and effectively. Recently, the curtailed checking of drainage plans was refined.</p> <p>The BD welcomed suggestions from stakeholders on measures to facilitate plan processing.</p>
11.	<p><u>Sustainable Building Design (SBD) Requirements for A&A Projects</u></p> <p>(Item raised by HKIA)</p> <p>HKIA requested BD to review the application of SBD guidelines for A&A projects and to confirm HKIA's understanding that SBD guidelines should not be applicable to a new extension in A&A projects if that extension had no GFA concession involved.</p>	<p>The BD replied that the draft revised PNAP APP-152 and other relevant PNAPs were being finalised for circulation to PlanD and LandsD for comments. The revisions aimed to clarify circumstances not adequately covered in the current version including those raised by HKIA. Other issues included the provision of site coverage greenery and the application of the SBD Guidelines to A&A works involving erection of a new building. The revised SBD guidelines, together with other necessary clarifications, would be circulated to BSC and APSEC members for</p>

		comments in due course.
12.	<p><u>Consent & Form BD103 for GI, Foundation and ELS Works</u> (Item raised by HKIE)</p> <p>Matters arising from Item 8 of the APSEC Discussion Forum on 18 October 2013 regarding the dispatch arrangement for consent and Form BD 103 for GI, Foundation and ELS Work.</p>	<p>The BD would further remind their Sectional Registry to dispatch the consent letter together with Form BD103 for GI, Foundation and ELS works directly to RSE or RGE who submit the Form BA 8 for consent application.</p>
13.	<p><u>Determination of Site Area</u> (Item raised by HKIA)</p> <p>HKIA requested BD to establish a standard method for measuring the site area and to clarify if the site area should follow the lease conditions or the coordinates of the site boundary points. HKIA also requested BD to clarify the accuracy required, i.e. the number of figures after the decimal point, of the areas included in the calculations.</p>	<p>The BD noted the issue and would relay the findings to the stakeholders after study.</p>
14.	<p><u>Dissemination of Summary of Items Discussed in ASPEC Discussion Forum to BD staff</u> (Item raised by HKIA)</p> <p>HKIA requested BD to disseminate the summaries of the items discussed in various APSEC Discussion Forums to BD's staff for easier agreement on the related issues between APs and BD's staff.</p>	<p>The BD advised that the confirmed Summary of Items discussed at APSEC Discussion Forums had been uploaded onto the Department's intranet for dissemination to the BD staff.</p> <p>The BD advised that different views between APs and case officers on interpretations of the BO and allied regulations could be resolved</p>

		via extant communication channels, such as discussion with respective senior or chief.
15.	<p><u>Height of Protective Barrier of Curtain Wall</u> (Item raised by HKIA)</p> <p>HKIA raised that recently, BD had required in the pre-OP inspection of some developments that the height of the openable windows in the curtain wall be measured from the top of the adjacent 300mm high curb, despite a section in the approved GBP showing the height of openable windows being measured from the finished floor level.</p>	<p>The BD confirmed that the height of openable windows in a curtain wall should be measured from the top of the adjacent 300mm high curb (with a flat top surface).</p>