

## Summary of Items Discussed in 2/2018 APSEC Discussion Forum on 23 March 2018

	Items proposed by Convenors for Discussion	Summary of Discussion and BD's Responses
	<b>Items raised by HKIA</b>	
1.	<p><b><u>Electronic Form Submission System (EFSS)</u></b></p> <p>After the implementation of EFSS, there are some standard forms in which the original fields for certain certificate/declaration had been deleted, e.g. Appendix B to PNAP APP-151, where the original field for declaration signed by Registered Professional Engineer (RPE) had been deleted leaving only the AP to declare the correctness of information contained, although such was indeed prepared by the RPE. The BD is requested to advise whether it is the genuine intention, or else further update of the Form is necessary.</p>	<p>BD advised that as the AP should be the coordinator of the project, the declaration form referred in PNAP APP-151 should be signed by the AP accordingly.</p>
2.	<p><b><u>Fast Track Processing of Simple A&amp;A Submissions</u></b></p> <p>As per Para. 24 of PNAP ADM-19, for simple A&amp;A works which do not involve the structure of the building, concurrent applications for fast track approval and consent will be processed within 30 days. However, when checking of loading due to, say, change in use and/or addition of mass concrete fill, etc. is required, applications for fast track may usually be not accepted despite no actual structural alteration work is involved. In this regard, we would suggest BD should consider allowing fast track processing for simple A&amp;A submissions which require structural checking only but without actual structural alteration works.</p>	<p>For simple A&amp;A works which involved checking of loading only but without actual structural works, BD advised that structural assessment should be submitted concurrently with the A&amp;A plans submission if fast track processing would be applied for. The BD would favourably consider allowing fast track processing provided that sufficient information had been submitted.</p>

	<b>Items raised by HKIE</b>	
3.	<p><b><u>Temporary Acting during Absence of AP/RSE/RGE</u></b></p> <p>According to BO Section 4(2) and B(A)R 23(2), if AP/RSE/RGE is absent from Hong Kong, he is required to nominate another AP/RSE/RGE and notify BA within 7 days with Form BA21.</p> <p>RSEs need to travel to Mainland for audit inspection of precast factory monthly for each project so as to fulfil the QA requirement in accordance with PNAP APP-143. Can we simplify this administrative procedure by waiving the submission of Form BA21 should the temporary absence is less than 24 hours and the RSE can be reached by mobile phone.</p>	<p>HKIE stated that the proposal aimed to save the resources in administration works. The AP/RSE/RGE in temporary absence of less than 24 hours would still be responsible for the supervision of their projects.</p> <p>BD replied that there were no provisions under the BO that the submission of Form BA21 could be waived for a short period of temporary absence from Hong Kong. The statutory requirement was to ensure that the AP/RSE/RGE responsible for the works was readily available to discharge duties under the BO, in particular when an emergency situation arose. Reference should be made to PNAP APP-3.</p>
	<b>Item raised by AAP</b>	
4.	<p><b><u>Open Kitchen</u></b></p> <p>The issue of open kitchen was discussed vigorously in past Forums including:</p> <ul style="list-style-type: none"> <li>• Item 13 of 3/2017 – in considering whether 600mm screen wall would be required, BD would pragmatically consider the layout of the flat; and</li> <li>• Item 2 of 3/2016 – the toilet door opening should be at least 1700mm from the edge of the kitchen bench from health point of view.</li> </ul>	<p>BD confirmed that there was no change regarding the requirements of open kitchen further to previous discussions. For instance, all the smoke detector(s), sprinkler head(s) and FRR screen wall should be provided for open kitchen in accordance with Clause C13.4 of FS Code 2011. Reference could be made to the explanation given in previous discussion under Item 7 of 1/2016 that the purpose of the wall was to “<i>shield the evacuees from radiant heat of stove fires, allowing the</i></p>

	<p>We wish to know whether there have been any changes to the above. In particular, we also wish to know whether the provision of 600mm full height screen wall having an FRR not less than -/30/30 for open kitchen adjacent to flat exit can now be waived as long as:</p> <ul style="list-style-type: none"> <li>(i) the stove of the open kitchen is 2m or more from the door handle of the flat exit door; and</li> <li>(ii) the stove is without naked flame.</li> </ul>	<p><i>necessary pause of evacuees to open the door (and gate) without being seriously charred". Besides, if the screen wall indicated in the layout of the open kitchen could not perform effectively the intended shielding function, such layout would generally not be accepted except for cases under special circumstances.</i></p>
<b>AOB Items</b>		
5.	<p><b><u>Separation between 2 connecting Utility Platforms</u></b> (Item raised by AAP)</p> <p>Para 1(b)(vii) of Appendix A of JPN 2 states one of the exemption criteria of utility platforms (UP) for residential buildings as follows:</p> <ul style="list-style-type: none"> <li>• not less than 40% of the perimeter to the UP faces into open air, <b><u>OR</u></b></li> <li>• where the UP is attached laterally to another UP and separation between them if provided is of parapet height only, its longer side faces into the open air and is not enclosed above safe parapet height.</li> </ul> <p>It is our understanding that:</p> <ul style="list-style-type: none"> <li>(i) As long as a UP satisfies the requirement of 40% perimeter facing into open air, it does not need to fulfill the later requirement even if it is attached laterally to another UP;</li> <li>(ii) For UP which is attached laterally to another UP, it needs not to achieve the requirement of 40% perimeter facing into open air as long</li> </ul>	<p>BD confirmed that AAP's understanding was correct. BD would take into account the likelihood of abuse after occupation in vetting the submission.</p>

	<p>as it fulfils only the later requirement.</p> <p>We wish to know if our interpretation is correct.</p>	
6.	<p><b><u>Submission of Foundation and Superstructure Plans by Different RSE</u></b> (Item raised by HKIE)</p> <p>According to B(A)R 15, the BA may refuse to accept plans from 2 or more AP/RSE/RGE, in respect of works at the same premises. Can we have two different RSE for foundation and superstructure plans separately?</p>	<p>BD advised that different RSEs might submit foundation and superstructure plans separately on case-by-case basis provided that the two plans would be compatible and the responsibilities of the RSEs at the interface of design were clearly demarcated. BD also noted that such arrangement would be applicable to structural plan submissions only and the works would still be supervised by single RSE in each stage of the works.</p>