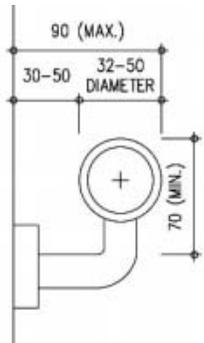
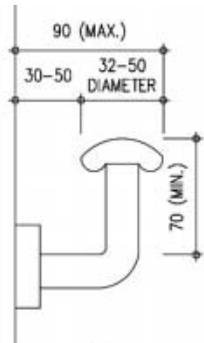


## Summary of Items Discussed in 4/2018 APSEC Discussion Forum on 17 August 2018

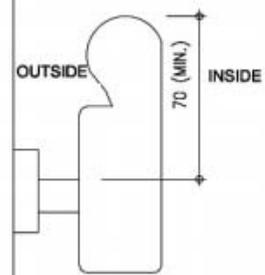
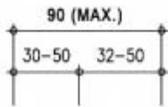
	Items proposed by Convenors for Discussion	Summary of Discussion and BD's Responses
	<b>Items raised by HKIA</b>	
1.	<p><b><u>Division 8 – Handrails, Chapter 4 of Design Manual: Barrier Free Access 2008 (DMBFA)</u></b></p> <p>Paragraphs 28(3) &amp; (4) in Division 8 of Chapter 4 of DMBFA state that in addition to tubular shape, handrail in other shapes that can provide the user a grip similar to that specified in the case of tubular handrails is acceptable. Based on the above, our understanding is that shapes of handrail other than those illustrated in Figure 15 of DMBFA as extracted below, such as <i>rectangular</i> or <i>oval</i> shape providing a grip of not less than 32mm and not greater than 50mm, should also be acceptable. Would BD please advise if our understanding is correct.</p>	<p>BD advised that the design of handrail should comply with the requirements stipulated in paragraph 28 in Division 8 of the Third Schedule of Building (Planning) Regulations. For design of handrails other than those shown in Figure 15 of DMBFA, BD would consult the Technical Committee on DMBFA and would advise the result in due course.</p>



TYPE 1



TYPE 2



TYPE 3

2. **Protective Barrier – Regulation 8(3) of the Building (Construction) Regulations (B(C)R)**

Regulation 8(3) of B(C)R requires the lowermost 150mm of protective

(Item withdrawn by HKIA during meeting.)

	<p>barrier be built solid. For protective barrier that is constructed with prefabricated parapet such as tempered glazing or metal panels, open joint between adjoining panels is normally provided for construction tolerance as well as thermal movement. Where such glazing/metal panels are designed to rest directly on the finished floor level, would BD please consider to accept such open joint (without sealant) between adjoining panels at the lowermost 150mm of the protective barrier provided that the open joint is maintained at not more than 10mm in width.</p>	
<p>3.</p>	<p><b><u>Food Serving Opening on Kitchen Wall of Licensed Food Premises</u></b></p> <p>With reference to the standard requirements of FSD for the licensing of food premises (viz., Form PPA/101(F)-2 for Light Refreshment Restaurant with low fire potential and Form PPA/101(I)-2 for General Restaurant with low fire potential), the food serving opening between the kitchen and the seating accommodation not exceeding 0.2m<sup>2</sup> in area shall be protected by a <i>drop hatch</i> with not less than half-hour fire resisting period; whereas fire shutters shall be installed for opening exceeding 0.2m<sup>2</sup>. This is commonly established and acceptable in the licence application of food premises.</p> <p>Would BD please advise if similar arrangement as per above would be acceptable in new building projects and A&amp;A works such that <i>fire damper with fusible link</i> can be installed for protecting food serving opening with size not exceeding 0.2m<sup>2</sup>.</p>	<p>BD advised that despite the use of fire damper with fusible link for protecting food serving opening with size not exceeding 0.2m<sup>2</sup> was acceptable to FSD during the course of licence application, such arrangement was not in full compliance with the FS Code and hence would not be acceptable in new building projects or A&amp;A works.</p> <p>In this regard, HKIA suggested reviewing the above at the Technical Committee on FS Code so that the differences could be reconciled.</p>

<p>4. <b><u>Design and Disposition of AC Platform</u></b></p> <p>Item 11 of ADF 2/2017 held on 17 March 2017 stated that a level difference of at least 500mm between the balcony/UP and the adjoining AC platform (large platform for 2 nos. of AC units) must be provided.</p> <p>Coupling with the requisite 150mm level drop between balcony/UP and the interior of the habitable space, as well as the 150mm thick AC platform, the resulting soffit of the AC platform would be at least 800mm below the floor of the unit. This would adversely limit the height of windows of the unit below, thereby prejudicing the optimal extent of lighting and ventilation from reaching the said unit.</p> <p>We would therefore like to seek BD's clarification and consideration that:</p> <ul style="list-style-type: none"> <li>(i) if the requirement can be relaxed/adjusted where no possible abusive use of the AC platform is readily envisaged, and</li> <li>(ii) such relaxation/adjustment, if any, is applicable to AC platform of all sizes.</li> </ul>	<p>BD advised that relaxation on the required level difference between balcony/UP and the adjoining AC platform would be considered on a case basis with due regard to the circumstances and difficulties of individual cases.</p> <p><i>[Post-meeting notes: Subsequent to an ad-hoc meeting held on 27.9.2018 with representatives of APSEC members, BD has reviewed the need of a 500mm level difference between the balcony/UP and the adjoining AC platform and it was concluded that a level difference would not be required if the AC platform would be at least 350mm away from the balcony/UP, adequate and proper access for maintenance of the AC unit(s) should be provided.]</i></p> <p>BD further briefed members that subsequent to the discussion in the 5<sup>th</sup> meeting of the Working Group on Design for Safety formed under BSC &amp; APSEC on 6 August 2018, the following amendments to the “Guidelines for Design and Safety Provisions for the AC Platforms” appended to BD’s Circular Letter on 23 December 2016 would be made with immediate effect:</p> <ul style="list-style-type: none"> <li>(i) Projection of the platform not more than 900mm may be accepted disregarding the thickness of the protective barrier/guard-rail/screen and its supporting structural members <i>[paragraph 3(a)]</i>;</li> <li>(ii) A clear working space of 400mm on one side (instead of 300mm on both sides) would be required <i>[paragraph 3(b)]</i>;</li> </ul>
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- (iii) On the side where the platform also serves as the worker's landing through windows, the working space could be increased to a maximum of 500mm (instead of 400mm) *[paragraph 3(b)]*;
- (iv) If one layer of AC is provided, height of screen, if provided, should be not less than 0.9m and not more than 1.1m (instead of the AC) *[paragraph 3(d)]*;
- (v) Screens may be provided at a platform (including both sides of the platform) if paragraphs 4(a) to (d) were met. Paragraph 4(e) would be dispensed with. *[paragraph 4]*;
- (vi) Services and utilities not serving AC may pass through the platform, provided that the working space required will not be jeopardized. For example, vertical stack may pass through the AC platform not occupying the working space required; or the services may run horizontally at a level above the platform not jeopardizing the carrying out of maintenance.
- (vii) Minor encroachment onto the working space for the component of the AC outdoor unit may be accepted.

The above amendments would be incorporated in the code of practice for means of access for external maintenance to buildings which was under preparation.

*[Post Meeting Notes: As regards members' concerns on the possible difficulties which might be encountered for construction of concrete AC platform arising from the policy to disregard the thickness of any protective barrier/guard-rail/screen from the permitted projection, the issue related to*

		<p><i>the requirement of maximum span limit of 1,000mm for pure cantilevered slab under the Code of Practice for Structural Use of Concrete 2013 and PNAP APP-68 would be followed up by the Technical Committee on the Code of Practice for Structural Use of Concrete separately.]</i></p>
<p>5.</p>	<p><b><u>Protective Barrier for Greening</u></b></p> <p>PNAP ADV-35 (Greening in Buildings) stated that protective barriers, such as balustrades or railing, should be provided for safe access to the greening area and to prevent the danger of falling in accordance with regulation 8 of B(C)R.</p> <p>It was further recorded in item 9 of the meeting notes of Joint BSC/APSEC 2/17 Meeting that <i>“For greening on inaccessible roofs, guard railings commonly installed at such roofs to prevent the danger of falling of maintenance personnel would suffice. In case of greening on accessible roof, if stepping onto the greening would be allowed, the height of the parapet might need to be raised in order to comply with regulation 8 of the Building (Construction) Regulations.”</i></p> <p>We wish to re-confirm our understanding that for greening where stepping on by people is not intended, such as planters, the provision of protective barrier to comply with regulation 8 of B(C)R is not necessary.</p>	<p>BD advised that protective barrier would not be required for planter which was inaccessible. Reference should be made to the design and construction requirements of protective barriers as laid down in PNAP APP-110, in particular, paragraph 3 on the measurement of height of a barrier which should be measured from the finished floor level of the surface adjoining the barrier where people could step on.</p> <p>In response to HKIA’s enquiry on the need of guard rails when fall-arresting system had already been provided, BD advised that the occupational safety requirements on work at height as imposed by the relevant authority should be complied with by the AP/RSE when designing a building.</p>

<b>Items raised by HKIE</b>	
<p>6. <b><u>Submission of Documents before Certification of Completion of Works</u></b></p> <p>Upon submission of Form BA13 or Form BA14 for certification of the completion of works in accordance with the approved plans, sometimes we are asked to provide further particulars or documents which are not clearly imposed in approval letters or shown in approved plans.</p> <p>Normally, technical documents such as concrete cube strength test report, steel reinforcement bar and structural steel mill certificates, cantilevers reports, structural glass reports, etc. will be submitted in batches and phases well before submission of Form BA13/14. BD will normally conduct checking upon receipt of these statutory forms and the checking time will therefore become very critical.</p> <p>To facilitate smooth processing of these submissions, it is suggested to develop a few standard checklists for different types of building works such as demolition, GI, foundation and superstructures, etc. It is also suggested BD to provide comments on these submissions after 1 month upon receipt of the document before the submission of Form BA13/14.</p>	<p>BD responded that the required technical documents would be stated in the approval letter and its appendices. If there were any queries, the case officer should be consulted.</p> <p>BD had recently implemented a streamlined procedure to facilitate the processing of Form BA13/14 submission. Upon completion of the structural works, BD would issue a reminder with sample checklists to AP/RSE/RGE for timely submission of the required technical documents prior to Form BA13/14 submission.</p> <p>BD added that checklists for the processing of Form BA13/14 on various types of building works had been prepared for internal use. AP/RSE/RGE could liaise with individual case officers to facilitate the submission of the required documents whenever necessary.</p>
<p>7. <b><u>Streamlined Procedures for Carrying out Minor Works before Demolition of Buildings</u></b></p> <p>BD issued a Circulation Letter on 26 June 2017 promulgating the streamlined procedures for carrying out Minor Works (MW) before</p>	<p>BD advised that Form MW01 for minor works to be carried out before demolition of the parent building could be submitted together with the</p>

	<p>demolition of buildings. It requires the Form for Notice of Commencement of Class 1 MW (Form MW01) be submitted together with the application for approval of demolition plans (Paragraph 2 in the Appendix of Circular Letter refers).</p> <p>As demolition contractor is normally not appointed before the approval of demolition plans, it is suggested the Form MW01 be submitted together with consent application for demolition works.</p>	<p>consent application for commencement of the demolition works provided that it should be submitted not less than 7 days prior to the commencement of the minor works, and the project team responsible for the demolition of the parent building should also be responsible for the minor works.</p>
<b>Item raised by HKIS</b>		
8.	<p><b><u>Inadequate Provision of Natural Lighting and Ventilation in Office Conversion</u></b></p> <p>For wholesale conversion of industrial building where there are difficulties in providing the required natural lighting and ventilation, application for modification of Regulations 30 and 31 of the Building (Planning) Regulations will be favourably considered subject to conditions set out in paragraph 3(ii) of PNAP APP-150. Would it be possible to extend the relaxation to A&amp;A works converting a floor/portion of a building into office use.</p>	<p>BD advised that the relaxation in PNAP APP-150 was for wholesale conversion of industrial buildings and is not applicable to other A&amp;A works.</p>
9.	<p><b><u>Assessment Report for Modification of Natural Lighting and Ventilation</u></b></p> <p>For A&amp;A submission involving modification of natural lighting and ventilation for toilet facilities, assessment report with calculation of air</p>	<p>BD advised that assessment report with calculation of air change should be submitted at GBP submission stage. The product catalogue could be</p>

	<p>change and information/catalogue of exhaust fan should be submitted to BD for consideration before plan approval. Is it possible that such calculation and product catalogue be submitted at completion stage since contractors are normally not appointed at GBP submission stage.</p>	<p>submitted at completion stage together with the Form BA14.</p>
<p><b>Item raised by AAP</b></p>		
<p>10.</p>	<p><b><u>Replacement of Display Surface (vinyl) of Signboard</u></b></p> <p>Minor works is applicable for the replacement of vinyl display surface of signboards provided that the surface areas do not exceed certain size limits. Replacement of vinyl display surface of signboard larger than the size limit is not covered by Minor Works Control System and is considered as building works requiring approval and consent, supervision, and Form BA14 submission. Building professionals including the AP, and Registered Contractors will need to be involved, including a Registered Specialist (Demolition) Contractor for its removal, and another Registered General Building Contractor for putting up the new vinyl display surface.</p> <p>We would like to know if our understanding is correct.</p> <p>Currently the Form Appendix I under PNAP APP-126 is tailored for fast track processing of plan submission for erection of new signboard and its content is irrelevant for replacement of display surface in a signboard. For replacement of display surface without altering the structure or the system of the signboard, we would like to know if the fast track system will also apply.</p>	<p>BD confirmed that for replacement of display surface of signboard larger than the size limit covered by the Minor Works Control System, prior approval and consent for the replacement would be required.</p> <p>Similar to A&amp;A submission, the removal of the existing display surface and the installation of the new display surface could be included under the same A&amp;A submission. Also, fast track processing under PNAP APP-126 could be applied for replacement of display surface using conventional material.</p>

	<p>Since display surface replacement will take place quite regularly, we suggest that a simple mechanism for its control to be available for adoption by the industry.</p>	
11.	<p><b><u>PNAP APP-130</u></b></p> <p>Performance-based approach for lighting and ventilation was only applicable for habitable rooms and kitchens while office use is excluded. We would like to know the rationale behind this exclusion.</p>	<p>BD advised that the subject matter was being studied and would advise the result in due course.</p>
12.	<p><b><u>Top Hung Windows in Non-Domestic Building</u></b></p> <p>Item 12 of APSEC 1/2012 provided clear requirements on how wide the top hung window should be openable. It is our understanding that these windows should be openable to the extent as stated. But it is not necessary for the windows to be able to hold at that position. The windows can be designed to hold at a position with a smaller opening.</p> <p>We wish to know if our understanding is correct.</p>	<p>(Item withdrawn by AAP during meeting.)</p>
	<b>AOB Items</b>	
13.	<p><b><u>Subdivision of Office / Non-domestic Premises</u></b></p> <p>(Item raised by BD)</p> <p>Further to the discussion item 7 of ADF 3/2018, BD would like to brief</p>	<p>BD advised that whether the subdivided office/non-domestic layout</p>

	<p>members on measures in processing proposal for office/non-domestic use.</p>	<p>resembled those for domestic use would be examined on case basis. Subdivision proposal with design and facilities such as small office/non-domestic unit having en-suite toilet not being commensurate with the office/non-domestic use would not be accepted.</p>
<p>14.</p>	<p><b><u>Clause B20.9 of FS Code – Provision of Thoroughfare for Cinema or Theatre of Capacity not more than 500 Persons</u></b> (Item raised by BD)</p> <p>BD would like to brief members on the relaxation of Clause B20.9 of FS Code regarding the provision of thoroughfare for cinema or theatre of capacity not more than 500 persons.</p>	<p>BD would on case basis, favourably consider extending the relaxation under Clause B20.9 of FS Code to cover cinemas and theatres in a non-domestic building not having polluting industrial undertakings or the non-domestic part of a composite building, such that the site of such premises might be permitted to abut on one thoroughfare if the said thoroughfare was an acceptable EVA and Director of Fire Services had no adverse comment on the arrangement.</p> <p>Clause B20.9 of FS Code would be amended to reflect the above arrangement in due course.</p>